



COMPLAINT MANAGEMENT AND SOCIAL IMPACT MONITORING PROGRAM

AS PRESENTED AND APPROVED BY
THE MONITORING AND
CONSULTATION COMMITTEE

INUKJUAK, NUNAVIK, JULY 2020

Foreword

This program was presented and approved by the Monitoring and Consultation Committee established for the Innavik Hydro project and is submitted in accordance with the conditions set in the *certificat d'autorisation* delivered on August 23, 2019, by the Ministère de l'Environnement et de la Lutte contre les changements climatiques (MELCC). This program was elaborated with the valuable inputs of Mr Robert Lanari, Anthropologist who worked numerous years with the communities and stakeholders of Nunavik.

Innavik Hydro LP ("the proponent") is committed to apply this program in full, with the caveat of possible limitations that could be put in place by the health authorities regarding COVID-19 that may limit direct contact with the local population. In that event, solutions will be developed and implemented to achieve the objectives of this program without compromise.

Objectives

This programme has two main objectives:

1. The first, targeted: to identify and correct the immediate negative actions, behaviours and impacts resulting from the presence of the construction site of the Innavik Hydro power plant and,
2. The second, broader: to identify and provide mitigation measures for the indirect impacts of the presence of the construction site on the local population.

What are the impacts?

A first category of impacts can, for example and without being restrictive, be of limited scope such as access to the territory during construction, noise and dust, etc. But they can also have very serious aspects: alcohol or drug smuggling, physical or sexual abuse by a person associated with the project, manifestations of racism or other denigrating behaviour.

A second category is more diffuse and more the result of a factual state of affairs than of the precise action of a person. For example, it is legitimate to think that a social tension may arise about the existence of the site without this being attributable to any behaviour. Any change in a community can lead to social stress and mitigation measures may become necessary.

Moreover, a response deemed inadequate to problematic behaviours will eventually become a source of negative social impacts in the community, leading to a breakdown in the bond of trust towards the entire process. Therefore, a true social impact monitoring program must also, and first and foremost, ensure that "ordinary" or individual cases are well treated and managed so that there is no contamination of the social climate by these more limited unresolved problems.

Therefore, this program has two main components: a component on complaints and monitoring of problematic individual behaviour, and a component on social impacts. Also, it would be presumptuous for anyone to think that they could impose separate processes with unique channels for the Inukjuak population for each function, with, for example, one telephone number to report a problem on one topic and a different process to identify a problem on another topic. The responsibility for triaging the different elements rests with the Proponent and they will need to ensure that a question, information, complaint or other issue follows the right path and gets an adequate response. It is not up to the people of Inukjuak to ensure that they are heard, but it is up to the proponent to ensure that they are listened to.

Duration of this protocol

This plan will take effect in the spring of 2020 and its various stages will run continuously until December 2023, i.e. one year after the end of the work. After a one-year break, a new monitoring and impact assessment will be carried out with a view to completing the process in 2025, three years after the facility is commissioned.

Monitoring social impacts

This program intends to monitor the impacts, both positive and negative, of the Innavik project under the following social parameters:

- Physical and mental health

Here health must be understood in terms of public health. Does the project influence the health of the population of Inukjuak? Positive or negative?

- Economy and Employment

What is the economic impact of the project and its effect on employment? What deficiencies need to be addressed?

- Education and Training

From the previous point.

- Traditional activities

What are the impacts on traditional activities: hunting, fishing, berries picking and others?

- Culture

The impact on culture goes beyond traditional activities, although they may be more difficult to identify, these impacts need to be considered.

Follow-up will therefore be done in coordination with a set of stakeholders already involved in the community of Inukjuak in addition to the general population itself. Public health, education, hunters and fishermen and others will therefore have to be solicited regularly in order to meet the objectives of this plan.

During the planned meetings, these groups and stakeholders will be called upon to specifically express their views on the project's impact on the previously-identified social parameters.

The communications challenge

The overriding challenge in monitoring social impacts lies in communication. The issue is to ensure that there are ways for the proponent to receive information, adapt and respond to the population. Then it must be easy for community members to communicate their concerns.

Positive consequences:

Several people and organizations approve the Innavik project. For many Inuit, non-Indigenous employees from outside Nunavik should receive training to make them aware of Inuit culture. Others see the project as an engine for economic development in the community. Finally, the bridge over the river will provide overland access to the territories on either side of the river.

Negative consequences:

Communication has already provided us with many of the community's expectations and concerns, in addition to some mitigation measures. We want to continue in the same vein and the communication plan we are developing for the next phases of the project is divided into reactive, proactive, curative and preventive channels. Finally, a process for managing community concerns and complaints about individual behaviour will be part of the communication program.

1- The reactive channel

a) Project Manager; At any time, the public will have the opportunity to contact the Innavik Hydro Project Manager in person, by phone or email at the Pituvik Landholding Corporation offices, and the Project Manager will record comments, positive or negative, and direct them to the appropriate person for response or action. The entire process should be documented from the time the information is taken to the response provided for possible transmission to the Monitoring and Consultation Committee.

b) Voicemail; A telephone number with a voicemail has been set up to receive calls from people (see the attached diagram). It should be noted that no more than two people, including the Project Manager, will have access to this voice mailbox and, as in other cases, will have to record the calls and forward their content to the persons responsible for the

follow-up process. A special mechanism will be put in place if such a call concerns an issue involving an individual related to the project, such as an allegation of abuse or something similar. This process is discussed in the next section on the complaint management process.

c) E-mail address; Similar to voicemail, an appropriate e-mail address has been established (see attached diagram) to receive messages from the public and these will be treated in the same way as messages received by telephone.

2 - The Proactive Way

The main approach will be that of seeking information, of going out to meet people.

a) Meeting with groups and organizations; Twice a year, groups (hunters and fishermen, seniors, women, etc.) and organizations (social services, police services, schools, etc.) will be met by the project director and the follow-up team to discuss with them their perception of the project, its potential effects and listen to their suggestions. The summary of these meetings will be the subject of a report to the Monitoring and Consultation Committee;

b) Radio Discussions; The Project Manager will speak to the community as often as necessary but certainly on a weekly basis to inform them of the progress of the work and also to receive comments and concerns.

Also, at least once a month during the construction season, open line sessions on the local radio will be held by the Project Manager and the monitoring team to gather the perceptions of individuals, again, the synthesis of these sessions will be submitted to the Monitoring Committee;

c) Feedback; Once the problems identified and corrective measures proposed, an "annual report and action plan" will be sent to the groups met during the previous year. This document will then be made public on the project's website and made available to the population in Inuktitut and English at the offices of the Pituvik Landholding Corporation. In addition, the conclusions and main points of this document will be presented on local radio in at least two sessions (day and evening) to ensure the widest possible dissemination.

d) Reference to the Complaint Process; If, in any of the above steps, a subject is raised that can be considered a direct or indirect complaint against an individual associated with the project, the individual or group should be encouraged to immediately submit it to the process outlined in the following section in order to preserve the confidentiality of the individuals involved until the conclusion of the process.

3- The curative path

At the end of each construction season, a report will be drawn up which will be communicated to the Monitoring and Consultation Committee for discussion and validation. To follow up on this exercise, a consultation on corrective or mitigation measures will be undertaken with targeted stakeholders in the community, and external expertise may also be sought on this occasion.

Finally, the completed process, from assessment to solutions, will then be communicated to the population. This communication will be done primarily via radio and written documents on the project website and at the offices of the Pituvik Landholding Corporation.

This process must be completed before the end of April each year in order to precede the resumption of work. In addition, it will be mandatory for the next follow-up report to contain an evaluation of the effectiveness of the measures adopted.

4- Preventive measures

Of course, we must not lose sight of the fact that the best way to counteract negative effects is to prevent them. The proponent has committed to exercising a high degree of discipline among outside workers and others involved in the project. Zero tolerance will be applied to a range of negative behaviours. However, everyone agrees that such an approach, although necessary, is far from sufficient.

As noted above, communication is a major challenge for the proponent, but is also one of the main risks of existing negative effects. It is easy to think that a better knowledge of the Inukjuak community, its culture and its challenges could be an important factor in the prevention of many negative impacts, to this effect, training is given by the Project Manager to any worker coming from outside Nunavik. In the same way, a better knowledge of the project, its effects and the construction site could be, for the community, an effective way to prevent undesirable impacts.

Several measures will therefore be deployed to promote the circulation of information between the proponent and the community.

Outside workers will receive some training when they are welcomed at the workcamp. This multi hour training will focus on Nunavik in general, Inuit culture and life today. For some (site managers, supervisors and others in authority), this training will be enriched by the organization of regular activities to raise awareness and knowledge of the community. In small groups, they will be called upon to discover the community in its contemporaneity. Although these activities will only be attended by a limited number of workers, it is expected that, within the framework of the work camp, the information received will circulate sufficiently to positively influence the other workers.

Outside of these training activities, community members will be invited to come and share a meal with the workers at the camp on a regular basis to get to know each other and to have informal discussions on various topics. From the knowledge of the other comes respect.

At least twice during the construction season, community members will be invited to visit the construction site in a supervised manner and ask questions directly. A similar visit targeting the school clientele will also be organized each year.

In addition, during the second year of construction, representatives of communities that have gone through a similar process of building a hydroelectric project will be invited to speak with the community via radio and a public activity at the recreation centre. This was done during the pre-construction period and allowed the population to better understand and appreciate the challenges and benefits of such a project.

Process for managing community concerns and complaints about individual behaviour

Concerns received through any of the previously-identified channels about site activities, for example, and without limitation, about noise, dust, physical damage or anything else of this type, must be recorded in writing by the project manager (see attached form) who will forward them according to the following parameters:

1) For concerns regarding the work; These will be communicated to the site superintendent for possible corrective measures. The Superintendent will have seven days to respond and propose a solution, after which the Project Manager will forward the response to the individual or group concerned.

If a satisfactory solution cannot be found, the case will then be referred to the Monitoring and Consultation Committee for advice and guidance at the next meeting.

2) For a complaint concerning an individual or related to individuals, the handling process will be more complex, and measures will be put in place to guarantee the confidentiality of the persons involved.

If the case involves criminal activity (aggression, violence, etc.), the person filing the complaint must be immediately encouraged to submit it to the competent authorities and the project proponent will ensure full cooperation with the authorities' follow-up.

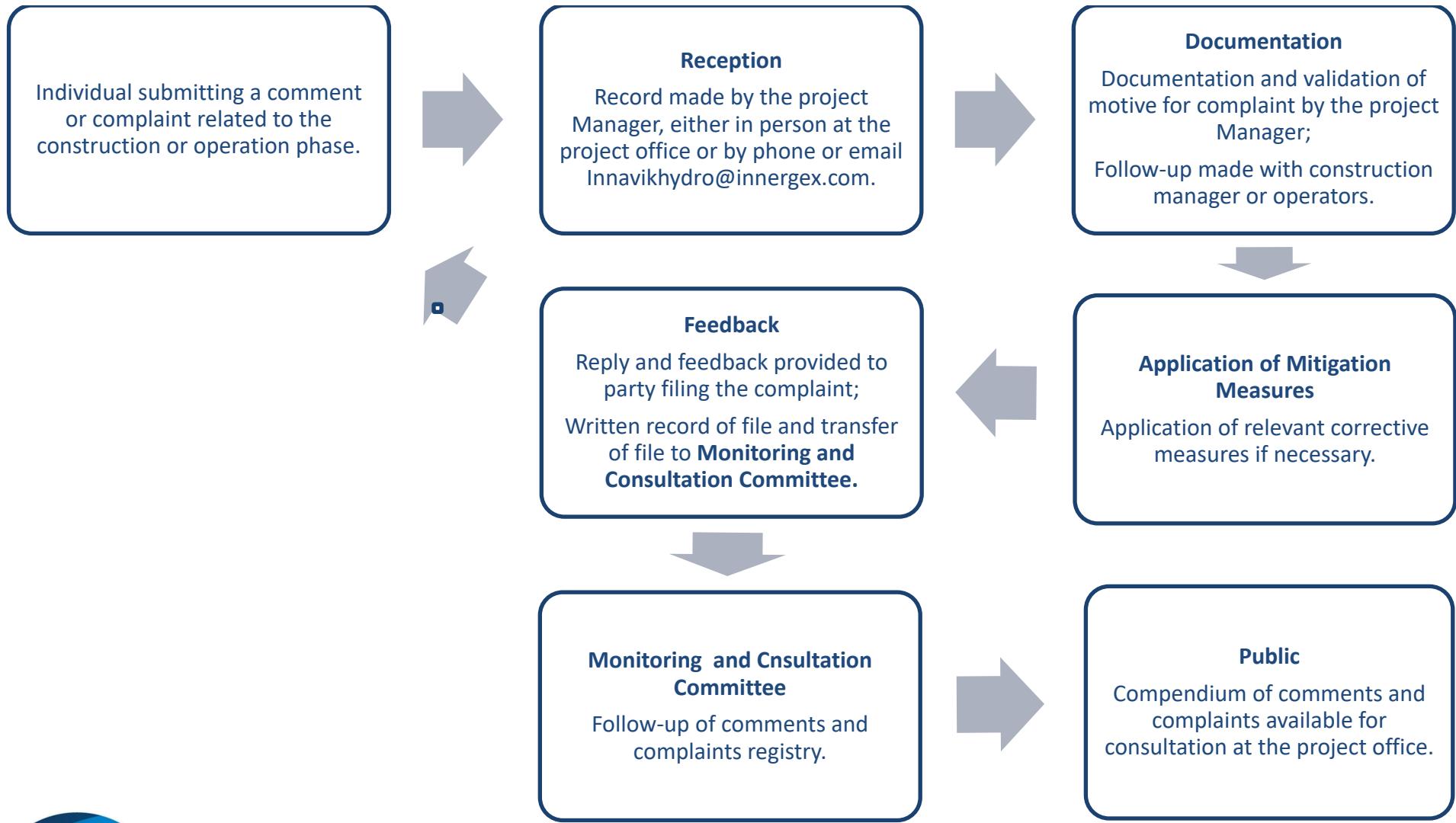
In the case of a complaint relating to inappropriate behaviour (racism, intimidation, abuse), the case will be dealt with in two parts. The validation of the complaint must be carried out with the utmost respect and confidentiality through a meeting with the project director or another person responsible for community relations. To follow-up on this first step, a specialized external resource could be called upon if it appears that the problem requires it. At this stage, the Monitoring and Consultation Committee will be informed of the existence of the complaint as well as of the immediate steps to be taken. The committee will then be called upon to act as an advisor in the follow-up.

If the Committee deems it necessary, a select committee consisting of a representative of the proponent, a representative of the general contractor and a representative of the Monitoring and Consultation Committee will have to decide on the status of the complaint and the follow-up action to be taken, as well as a plan to take corrective action. These measures could be of several types. For example, the case could be straightforward enough that a person whose behaviour is deemed inappropriate could be removed from the project.

While the proponent wishes to deal with all complaints diligently, it is to be expected that some cases may take longer than others. However, the proponent undertakes to follow-up on the status of each complaint with the person concerned every 14 days at most, until it is concluded.

3) Finally, in all cases, the conclusions of the steps taken to address the concerns and complaints will be presented to the Monitoring and Consultation Committee, which may then simply take note or suggest additional corrective measures.

**Diagram of Comment and Complaint Handling Process – Hydroelectric Power Plant
Construction and Operation Phases**



Innavik Hydroelectric Plant
Comment and Complaint Form

Date: / /

Name:			
Address:			
City:			
Province:		Postal code:	
Phone:		Email:	

Comment or complaint received:

In person ___ By phone ___ Email ___

Nature and description of comment or complaint
(Description, circumstances, place and time if relevant, etc.)

Section for use by the party responsible for addressing comments and complaints

Follow-up made
(Please describe the actions taken following reception of the comment or complaint)

Mitigation measures

(Please describe the mitigation measures or corrections taken/made)

Feedback and information

For complaints, when and by what means was a reply made to the party filing the complaint?

Additional information

Completed on: / /

Responsible for comment and complaint follow-up