



Tłıchǫ Government

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October 25th, 2018

VIA EMAIL

Joanne Deneron
Chairperson
Mackenzie Valley Environmental Impact Review Board
PO Box 938, 5202 – 50th Avenue
Yellowknife, NT X1A 2N7

Dear Ms. Deneron:

Tłıchǫ Government Final Decision on the Report of Environmental Assessment for the proposed Tłıchǫ All Season Road (EA1617-01)

As the Grand Chief of the Tłıchǫ Government, with jurisdiction related to the proposed Tłıchǫ All Season Road (“the Project”), I am writing to convey that we have completed our review of the Report of Environmental Assessment and Reasons for Decision for the Project dated March 29, 2018 (the “Report”).

As described in the Report, the Mackenzie Valley Environmental Impact Review Board (the “Review Board”) has recommended, pursuant to subparagraph 128 (1)(b)(ii) of the *Mackenzie Valley Resource Management Act* (the “Act”), that the Project be approved subject to the imposition of measures and proponent commitments necessary to mitigate significant adverse impacts on the environment.

The Tłıchǫ Government has decision-making authority for the proposed Project under section 131.1 of the Act. The Tłıchǫ Government has consulted with Responsible Ministers throughout the decision period and arrived at an agreed upon path forward. Tłıchǫ Government has recommended modifications to certain measures contained in the Report, pursuant to section 131.1(1)(b) of the Act. The modifications were developed following consultation with the Review Board. The final measures are attached.

Tłıchǫ Government will continue to work with members of our communities, the Government of the Northwest Territories, Tłıchǫ Community Governments and the Tłıchǫ Community Services Agency as well as other agencies and departments of Government to ensure impacts are effectively mitigated and the project brings benefits to Tłıchǫ people.

We thank the Review Board for the work they have done on this important project for Tłıchǫ people.

In Tłıchǫ Unity,



Grand Chief George Mackenzie
Tłıchǫ Government

Enclosure

c.c.: The Honourable Louis Sebert, Minister of Lands
The Honourable Robert C. McLeod, Minister of Environment and Natural
Resources
The Honourable Carolyn Bennett, Minister of Crown-Indigenous Relations Canada
The Honourable Dominic Leblanc, Minister of Intergovernmental and Northern
Affairs and Internal Trade
The Honourable Amarjeet Sohi, Minister of Natural Resources Canada
The Honourable Wally Schumann, Minister of Infrastructure
Mr. Gary Bohnet, Principal Secretary, Office of the Premier of the Northwest
Territories
Joe Mackenzie, Chair, Wek'èezhìi Land and Water Board

Measure #5-2 (Parts 1,2,3) Original Wording Measure 5-2: Tłchq monitoring, engagement and reporting of adverse health and well-being impacts	Final Approved Wording Measure 5-2: Tłchq monitoring, engagement and reporting of adverse health and well-being impacts
<p>5-2, Part 1: Tłchq monitoring of adverse health and well-being impacts</p> <p>The Tłchq Government and Community Government of Whatì, with the support of the developer, and in collaboration with the Tłchq Community Services Agency, will establish and implement a framework to monitor and evaluate health and well-being impacts associated with the road, and will adaptively manage health and well-being impacts as described in Measure 5-1 and following guidance in Appendices B and C, for each year of construction and for a minimum of ten years of operations.</p> <p>Following ten years of Project operations, the Community Government of Whatì and Tłchq Government in collaboration with the developer, will re-evaluate the need for, and frequency of, monitoring, engagement, reporting and adaptive management.</p> <p>If the monitoring of harvest success rates and availability of country foods in Whatì (in Measure 5-1, Part 1, above) indicates a declining trend in harvest success and the consumption of country foods, the Tłchq Government and the Community Government of Whatì will develop and implement a strategy to improve availability of country foods for those most affected.</p>	<p>5-2, Part 1: Tłchq monitoring of adverse health and well-being impacts</p> <p>The Tłchq Government, Government of the Northwest Territories, Tłchq Community Services Agency and Community Government of Whatì, with the support of the developer, will establish and implement a framework to monitor and evaluate health and well-being impacts associated with the road, and will adaptively manage health and well-being impacts as described in Measure 5-1 and following guidance in Appendices B and C, for each year of construction and for a minimum of ten years of operations.</p> <p>Following ten years of Project operations, the Community Government of Whatì, Government of the Northwest Territories, Tłchq Community Services Agency and Tłchq Government in collaboration with the developer, will re-evaluate the need for, and frequency of, monitoring, engagement, reporting and adaptive management.</p> <p>If the monitoring of harvest success rates and availability of country foods in Whatì (in Measure 5-1, Part 1, above) indicates a declining trend in harvest success and the consumption of country foods, the Tłchq Government and the Community Government of Whatì will develop and implement a strategy to address the decline in the availability of country foods for those most affected.</p>
<p>5-2, Part 2: Public engagement The Tłchq Government and Community Government of Whatì, with the participation of the</p>	<p>5-2, Part 2: Public engagement The Tłchq Government, Government of the Northwest Territories, Tłchq Community Services</p>

<p>developer, the P3 operator and the Tłchq Community Services Agency, will meet with the residents of Whatì at least once per year to discuss:</p> <ul style="list-style-type: none"> a) priority health and well-being impacts at the individual, family and community level related to the Project; b) the effectiveness of programs or mitigations used to address these impacts; and, c) the need to adjust programs or implement additional mitigations. 	<p>Agency and Community Government of Whatì, with the participation of the developer, and the P3 operator, will meet with the residents of Whatì at least once per year to discuss:</p> <ul style="list-style-type: none"> a) priority health and well-being impacts at the individual, family and community level related to the Project; b) the effectiveness of programs or mitigations used to address these impacts; and, c) the need to adjust programs or implement additional mitigations
<p>5-2, Part 3: Reporting</p> <p>The Tłchq Government and Community Government of Whatì, with the support of the developer, will prepare and make publicly available an annual progress report on their efforts to mitigate impacts on health and well-being to the Community of Whatì. The report will describe engagement, current management and plans for future adaptive management.</p> <p>The findings of the report will be presented to the residents of Whatì, provided to the Whatì Inter-Agency Committee and provided to the Tłchq All-Season Road Corridor Working Group (see Measure 14-3).</p>	<p>5-2, Part 3: Reporting</p> <p>The Tłchq Government, Government of the Northwest Territories, Tłchq Community Services Agency and Community Government of Whatì, with the support of the developer, will prepare and make publicly available an annual progress report on their efforts to mitigate impacts on health and well-being to the Community of Whatì. The report will describe engagement, current management and plans for future adaptive management.</p> <p>The findings of the report will be presented to the residents of Whatì, provided to the Whatì Inter-Agency Committee and provided to the Tłchq All-Season Road Corridor Working Group (see Measure 14-3).</p>
<p>Measure #5-6 Original Wording</p> <p>Measure 5-6 Include Behchokò in accident response planning</p>	<p>Final Approved Wording</p> <p>Measure 5-6: Include Behchokò in accident response planning</p>
<p>The Government of the Northwest Territories will develop and implement an effective ground ambulance and highway rescue action plan along the road that will be designed in collaboration with the Tłchq Government, Community</p>	<p>The Government of the Northwest Territories will develop and implement an effective ground ambulance and highway rescue action plan along the road that will be designed in collaboration with the Tłchq Government, Tłchq Community Services</p>

Government of Whatì, and Community Government of Behchokò.	Agency, Community Government of Whatì, and Community Government of Behchokò.
<p>Measure #6-1 Original Wording</p> <p>Measure 6-1: Implementation of the Recovery Strategy for the Boreal Caribou in the NWT, and required range plans, for boreal caribou affected by the Project</p>	<p>Final Approved Wording</p> <p>Measure 6-1: Implementation of the Recovery Strategy for the Boreal Caribou in the NWT, and required range plans, for boreal caribou affected by the Project</p>
<p>6-1, Part 1: Develop and implement range plans</p> <p>The GNWT-ENR will develop and implement a range plan for boreal caribou (tòdzı) in the North Slave region, as required by the Recovery Strategy for the Boreal Caribou in the NWT. The GNWT-ENR will also develop and implement a range plan for any other region where boreal caribou (tòdzı) may experience impacts related to the Project.</p> <p>The range plan(s) will be developed collaboratively with Aboriginal groups and co-management partners. The range plan(s) will be completed before the Project is opened for public use.</p> <p>The GNWT-ENR will manage the amount of undisturbed habitat in the North Slave region to achieve the National Recovery Strategy recommended threshold for critical habitat, or a threshold proposed by the GNWT-ENR and approved by Environment and Climate Change Canada.</p>	<p>6-1, Part 1: Develop and implement range plans</p> <p>The GNWT-ENR will develop and implement a range plan for boreal caribou (tòdzı) in the North Slave portion of the NT1 range, as required by the <i>Recovery Strategy for the Boreal Caribou in the NWT</i>. The GNWT-ENR will also develop and implement a range plan for any other region where boreal caribou (tòdzı) may experience impacts related to the Project.</p> <p>The range plan(s) will be developed collaboratively with Aboriginal groups and co- management partners. GNWT-ENR will complete and submit a range plan for the North Slave portion of the NT1 range to the Wek'èezhì Renewable Resources Board for review under section 12.5.1 of the Tłıchò Agreement a minimum of 90 days before the Project is opened for public use.</p> <p>The GNWT will work collaboratively with the Tłıchò Government and other relevant Aboriginal and federal land management authorities to manage habitat to achieve the habitat disturbance threshold set out in this range plan to the greatest extent possible. The GNWT will consult with applicable Aboriginal groups as required.</p>

<p>6-1, Part 2: Information and adaptive management requirements</p> <p>For the area identified by the range plan(s) in measure 6-1, part 1 the following must be included in the development and implementation of the Recovery Strategy for the Boreal Caribou in the NWT and range plan(s):</p> <ul style="list-style-type: none"> • monitoring of population trends, abundance and distribution; • determination of population thresholds and triggers to inform adaptive management; • harvest monitoring and reporting including Aboriginal harvesting and non- Aboriginal hunting; • determining sustainable harvest levels; • identifying critical habitat; • ongoing habitat disturbance monitoring; • setting and meeting critical habitat objectives for each range; and, • monitoring predator populations including densities, movements and predation rates. <p>Monitoring will meet the requirement of Appendix C. GNWT-ENR will work with the developer to adaptively manage Project impacts on boreal caribou (t̄qdz̄ı) (following guidance in Appendix B).</p>	<p>6-1, Part 2: Information and adaptive management requirements</p> <p>For the area identified by the range plan(s) in measure 6-1, part 1 the following must be included in the development and implementation of the <i>Recovery Strategy for the Boreal Caribou in the NWT</i> or range plan(s):</p> <ul style="list-style-type: none"> • monitoring to determine population trends, abundance and distribution; • determination of population thresholds and triggers to inform adaptive management; • harvest monitoring and reporting; • determining sustainable harvest levels; • identifying critical habitat; • ongoing habitat disturbance monitoring; • setting disturbance thresholds for critical habitat and, to the greatest extent possible, managing habitat towards meeting these disturbance thresholds for each range planning region; and, • monitoring predator populations including densities, movements and predation rates. <p>Monitoring will meet the requirements of Appendix C. GNWT-ENR will work with the developer to adaptively manage Project impacts on boreal caribou (t̄qdz̄ı) (following guidance in Appendix B).</p>
<p>Measure #6-2 Original Wording</p> <p>Measure 6-2: Temporary no-hunting corridor for boreal caribou (t̄qdz̄ı)</p>	<p>Final Approved Wording</p> <p>Measure 6-2: Determine sustainable harvest levels for boreal caribou (t̄qdz̄ı) and implement measures to ensure harvest is sustainable if required</p>
<p>To mitigate significant adverse impacts from the project on boreal caribou (t̄qdz̄ı),</p>	<p>To mitigate significant adverse impacts from the project on boreal caribou (t̄qdz̄ı), the</p>

<p>the GNWT-ENR and Tłıchǫ Government will submit a wildlife management proposal under section 12.5.1 of the Tłıchǫ Agreement to the Wek'èezhì Renewable Resources Board. The proposal will establish a temporary no-hunting corridor to reduce the take of boreal caribou (tǫdzı) along the Project route. Only individuals exercising section 35 rights will be allowed to harvest boreal caribou (tǫdzı) in this corridor.</p> <p>The corridor will be established prior to the road being opened to the public. At a minimum, this hunting restriction will remain in place until the Recovery Strategy for Boreal Caribou in the Northwest Territories is fully implemented in the area of the range plan(s) required by measure 6-1, and sustainable harvest levels for the North Slave region are determined.</p>	<p>GNWT-ENR in collaboration with Aboriginal groups and in accordance with the requirements of the Tłıchǫ Agreement, will determine sustainable harvest levels for boreal caribou in the North Slave portion of the NT1 range prior to the road being opened to the public.</p> <p>In that same period, if current harvest levels are determined to exceed sustainable levels, management action will be undertaken in conjunction with the Tłıchǫ Government.</p> <p>If harvest levels are observed to increase towards unsustainable levels once the road is opened to the public, GNWT-ENR and the Tłıchǫ Government will submit a wildlife management proposal under section 12.5.1 of the Tłıchǫ Agreement to the Wek'èezhì Renewable Resources Board for the timely implementation of any measures necessary to ensure boreal caribou harvest in the region is kept within sustainable levels.</p> <p>Such measures may include the establishment of a no-hunting corridor along the Project route.</p>
<p>Measure 6-3 Original Wording</p> <p>Measure 6-3: Habitat offset and restoration plan</p>	<p>Final Approved Wording</p> <p>Measure 6-3: Habitat offset and restoration plan</p>
<p>The developer will offset effective boreal caribou (tǫdzı) habitat lost because of disturbance from the Project. The offset calculation will, at a minimum, be based on the area of the right of way with a 2500 m buffer on each side.</p> <p>The developer, with the involvement of GNWT-ENR, will prepare and implement a habitat offset plan. This plan will describe how the required habitat offset area (calculated as set out above) will be</p>	<p>The developer will offset effective boreal caribou (tǫdzı) habitat lost because of disturbance from the Project.</p> <p>The developer, with the involvement of GNWT-ENR, will prepare and implement a habitat offset plan. This plan will describe how the required habitat offset area will be determined and how it will be achieved. In preparing the plan, the developer will collaborate with Tłıchǫ Government and the Wek'èezhì Renewable Resources Board,</p>

<p>achieved. In preparing the plan, the developer will collaborate with Tłchq Government and the Wek'èezhì Renewable Resources Board, and consult with the following participants to this environmental assessment:</p> <ul style="list-style-type: none"> • Environment and Climate Change Canada; • Yellowknives Dene First Nation; and, • North Slave Métis Alliance. <p>The developer will make funding available to the parties to support this consultation and collaboration.</p> <p>The developer will submit a draft and a final plan as described below. Once approved, the developer will operate in accordance with the plan.</p> <p>The developer will submit a draft plan to the Wek'èezhì Renewable Resources Board for review under section 12.5.1 of the Tłchq Agreement, a minimum of 90 days prior to commencement of construction. The developer will submit the final habitat offset plan to the Wek'èezhì Renewable Resources Board for review under section 12.5.1 of the Tłchq Agreement, as soon as possible, and no later than 90 days prior to public use of the road. This final plan will include, at a minimum:</p> <ul style="list-style-type: none"> • the goals and objectives of the plan; • a discussion on the expected effectiveness of mitigations and offsets; • a decision framework to prioritize restoration areas, mitigations, and offsets, including references to the research on which the decision framework was based; • a discussion of how any proposed mitigations or offsets align with the Recovery Strategy for the Boreal 	<p>and consult with the following participants to this environmental assessment:</p> <ul style="list-style-type: none"> • Environment and Climate Change Canada; • Yellowknives Dene First Nation; and, • North Slave Métis Alliance. <p>The developer will make funding available to the parties to support this consultation and collaboration.</p> <p>The developer will submit a draft and a final plan as described below. Once approved, the developer will operate in accordance with the plan.</p> <p>The developer will submit a draft plan to the Wek'èezhì Renewable Resources Board a minimum of 30 days prior to commencement of construction. The developer will submit the final habitat offset plan to the Wek'èezhì Renewable Resources Board for review under section 12.5.1 of the Tłchq Agreement, as soon as possible, and no later than 90 days prior to public use of the road. This final plan will include, at a minimum:</p> <ul style="list-style-type: none"> • the goals and objectives of the plan; • a discussion on the expected effectiveness of mitigations and offsets; • a decision framework to prioritize restoration areas, mitigations, and offsets, including references to the research on which the decision framework was based; • a discussion of how any proposed mitigations or offsets align with the Recovery Strategy for the Boreal Caribou in the NWT and range plans; • details of proposed ways to offset habitat disturbance including restoration sites, mitigation
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<p>Caribou in the NWT and range plans;</p> <ul style="list-style-type: none"> • details of proposed ways to offset habitat disturbance including restoration sites, mitigation measures, offsets, forest fire fighting policies, or habitat management approaches; • a description of the spatial scale of the proposed offset, the habitat quality and type, site specific restoration activities, and any challenges; • a timeline for offsetting; • a quantitative and qualitative assessment of the total area of boreal caribou habitat proposed for restoration and the timeframe required for restoration; • a summary of consultation feedback that was integrated into the draft and final plans; a description of any Traditional Knowledge that was considered in the development of the plan, and how it was incorporated; and, • a description of any resources provided to Aboriginal groups to support their involvement in the drafting of the final plan, and for any involvement in the implementation of the plan. 	<p>measures, offsets, forest fire fighting policies, or habitat management approaches;</p> <ul style="list-style-type: none"> • a description of the spatial scale of the proposed offset, the habitat quality and type, site specific restoration activities, and any challenges; • a timeline for offsetting; • a quantitative and qualitative assessment of the total area of boreal caribou habitat proposed for restoration and the timeframe required for restoration; • a summary of consultation feedback that was integrated into the draft and final plans; • a description of any Traditional Knowledge that was considered in the development of the plan, and how it was incorporated; and, • a description of any resources provided to Aboriginal groups to support their involvement in the drafting of the final plan, and for any involvement in the implementation of the plan.
<p>Measure #8-1 Original Wording</p> <p>Measure 8-1: Integrated Fisheries Management Plan</p>	<p>Final Approved Wording</p> <p>Measure 8-1: Fisheries Management Plan</p>
<p>Fisheries and Oceans Canada and the Tłı̨chǫ Government, with the support of the developer, will develop and implement an Integrated Fisheries Management Plan for fisheries in the project area. This will prevent significant adverse impacts from additional fishing pressure that will likely result from increased access via the Project. In designing the plan, Fisheries and Oceans</p>	<p>Fisheries and Oceans Canada and the Tłı̨chǫ Government, with the support of the developer, will develop and implement Fisheries Management Plan for fisheries in the project area. This will prevent significant adverse impacts from additional fishing pressure that will likely result from increased access via the Project. In designing the plan, Fisheries and Oceans</p>

<p>Canada and the Tłıchǵ Government will engage the Wek'èezhì Renewable Resources Board, the Community of Whatì and other affected Aboriginal groups. Fisheries and Oceans Canada and the Tłıchǵ Government will submit the plan to the Wek'èezhì Renewable Resources Board for review under section 12.5.1 of the Tłıchǵ Agreement.</p> <p>As part of this plan, Fisheries and Oceans Canada and the Tłıchǵ Government, along with the above organizations, will complete the following work:</p> <ul style="list-style-type: none"> a) Complete work to understand baseline fishery and harvest conditions. This work will include, at a minimum: <ul style="list-style-type: none"> i. assessing yield and harvest; ii. identifying management issues; iii. establishing fisheries objectives; and, iv. clarifying management and stewardship arrangements. b) Design and implement, with support of the developer, mitigation to prevent or manage project impacts (which may include a regulatory and compliance plan). c) Design and implement monitoring plans, meeting the requirements of Appendix C. d) Design and implement an adaptive management plan (following guidance in Appendix B). <p>Fisheries and Oceans Canada and the Tłıchǵ Government will provide opportunity for the working group (required by Measure 14-3) and other</p>	<p>Canada will engage with the Tlıcho Government, the Wek'èezhì Renewable Resources Board, the Community of Whatì and other affected Aboriginal groups. Fisheries and Oceans Canada and the Tłıchǵ Government will submit the plan to the Wek'èezhì Renewable Resources Board for review under section 12.5.1 of the Tłıchǵ Agreement.</p> <p>As part of this plan, Fisheries and Oceans Canada and Tłıchǵ Government will complete the following work:</p> <ul style="list-style-type: none"> a) Complete work to understand baseline fishery and harvest conditions. This work will include, at a minimum: <ul style="list-style-type: none"> i. assessing yield and harvest; ii. identifying management issues; iii. establishing fisheries objectives; and, iv. clarifying management and stewardship arrangements. b) Design and implement, with support of the developer, mitigation to prevent or manage project impacts (which may include a regulatory and compliance plan). c) Design and implement monitoring plans, meeting the requirements of Appendix C. d) Design and implement an adaptive management plan (following guidance in Appendix B). <p>Fisheries and Oceans Canada and the Tłıchǵ Government will provide opportunity for the working group (required by Measure 14-3) and other interested parties to review and comment on this plan.</p>
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interested parties to review and comment on this plan.	
<p>Measure #9-1 Original Wording</p> <p>Measure 9-1: Monitoring harvest and managing wildlife to maintain successful harvest</p>	<p>Final Approved Wording</p> <p>Measure 9-1: Monitoring harvest and managing wildlife to maintain successful harvest</p>
<p>9-1, Part 1: Aboriginal harvest monitoring and reporting program</p> <p>To mitigate impacts on Aboriginal harvesters and to effectively inform management of wildlife populations in the area of the Project, GNWT-ENR will work together with the Tłıchǫ Government and Wek'èezhì Renewable Resources Board to develop and implement an Aboriginal harvest monitoring and reporting program.</p> <p>The harvest monitoring and reporting program will:</p> <ul style="list-style-type: none"> a) focus on boreal caribou, barren-ground caribou and moose population trends in areas accessed by winter roads and trails from the Project; b) be community-based and involve collaboration between Tłıchǫ Government and the developer; c) involve Traditional Knowledge holders and harvesters in monitoring wildlife harvesting trends; and, d) report on wildlife harvesting numbers and trends from monitoring checkpoints and/or other harvest monitoring methods annually to the Tłıchǫ Government, Wek'èezhì Renewable Resources Board, GNWT-ENR and other wildlife co-management partners. <p>The developer will fund this harvest monitoring and reporting related to the</p>	<p>9-1, Part 1: Aboriginal harvest monitoring and reporting program</p> <p>To mitigate impacts on Aboriginal harvesters and to effectively inform management of wildlife populations in the area of the Project, GNWT-ENR will work together with the Tłıchǫ Government and Wek'èezhì Renewable Resources Board to develop and implement a non-mandatory Aboriginal harvest monitoring and reporting program.</p> <p>The harvest monitoring and reporting program will:</p> <ul style="list-style-type: none"> a) focus on boreal caribou, barren-ground caribou and moose population trends in areas accessed by winter roads and trails from the Project; b) be community-based and involve collaboration between Tłıchǫ Government and the developer; c) involve Traditional Knowledge holders and harvesters in monitoring wildlife harvesting trends; and, d) report on wildlife harvesting numbers and trends from monitoring checkpoints and/or other harvest monitoring methods annually to the Tłıchǫ Government, Wek'èezhì Renewable Resources Board, GNWT-ENR and other wildlife co-management partners. <p>The developer will fund this harvest monitoring and reporting related to the</p>

project. The harvest monitoring will meet the requirements of Appendix C.	project. The harvest monitoring will meet the requirements of Appendix C.
9-1, Part 2: Use monitoring to inform management GNWT-ENR, in collaboration with the Tłchq Government and Wek'èezhì Renewable Resources Board, will consider wildlife management actions and mitigations based on the results of the monitoring above and the information collected by the GNWT's existing Resident Hunting Reporting Program, to help ensure sustainable Aboriginal harvesting of wildlife and report on monitoring results and management actions in the annual reviews of the Wildlife Management and Monitoring Plan.	9-1, Part 2: Use monitoring to inform management GNWT-ENR, in collaboration with the Tłchq Government and Wek'èezhì Renewable Resources Board, will consider wildlife management actions and mitigations based on the results of the monitoring above and the information collected by the GNWT's existing Resident Hunting Reporting Program, to help ensure sustainable Aboriginal harvesting of wildlife and report on monitoring results and management actions in the annual reviews of the Wildlife Management and Monitoring Plan.
Measure #9-2 Original Wording	Final Approved Wording
Measure 9-2: Cultural sensitivity in work camps and communities	Measure 9-2: Cultural sensitivity in work camps and communities
To mitigate the Project's impact on Tłchq culture and well-being of Tłchq residents, the developer will require that the P3 operator has culturally appropriate and specific policies in accordance with those set out by the Tłchq Government, GNWT departments and federal government. The P3 operator will have policies and programs in place for employee cultural orientation, developed by the Tłchq Government, for all non-Tłchq residents, including awareness of special cultural norms and practices.	To mitigate the Project's impact on Tłchq culture and well-being of Tłchq residents, the developer will require that the P3 operator has culturally appropriate and specific policies in accordance with those set out by the Tłchq Government, GNWT departments and federal government. The P3 operator will have policies and programs in place for employee cultural orientation, approved by the Tłchq Government, for all non- Tłchq workers, including awareness of special cultural norms and practices.