BACKGROUNDER

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ESG AND THE NEW ECO-COLONIALISM

CHOOSING INDIGENOUS EQUITY OWNERSHIP OVER 'STAKEHOLDER CAPITALISM'

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Executive Summary

This eco-colonialism has ironically been perpetrated by activists and faculty members who proudly wear badges of decolonization. They purport to speak on Indigenous peoples' behalf, and force fellow Canadians to walk on eggshells in our presence. Yet, just like the colonizers they claim to abhor, their campaigns deny us agency and autonomy.

- Chris Sankey, former elected councillor for the Lax Kw'alaams Band in B.C. and Indigenous businessman

ESG investing standards have become all the rage around the world. Big institutional investors and pension funds now race to outdo their competitors in meeting nebulous and politically charged criteria. ESG—which stands for Environment, Social, and Governance—asks businesspeople to take their eyes off the ball of company profitability and shareholder value. Indigenous communities have become interested in ESG investing. However, it has been discovered that ESG standards and metrics have been implemented without Indigenous input or approval. While some Indigenous organizations wish to bring more Indigenous input into the problem to try to salvage ESG, it would be more advisable to abandon ESG altogether.

ESG's long-standing hostility towards the energy sector due to its climate change agenda often pits ESG investing against First Nations that wish to freely develop energy sources. There is also a case study of 'Canada's Arctic Indigenous communities that have experienced divestment and lack of investment in necessary infrastructure due to ESG-influenced divestment campaigning. This paper argues that Indigenous communities—rather than try to fix ESG—focus on meaningful direct engagement with resource companies to ensure Indigenous input is respected and full equity ownership is attained.

ESG and Stakeholder Capitalism

Injecting politics into business and commerce is nothing new.

Businesses have faced political scrutiny for their activities for quite some time. Consumers have threatened and carried out boycotts to persuade business decision-makers to take this or that action. One of the most famous examples in modern history was the South Africa boycott movement, established in 1959, to persuade consumers to avoid South African goods to undermine that country's apartheid regime.

Realizing that businesses and corporations respond to threats to their bottom line or dividends in the case of corporations is something activists have realized for decades.

External pressure on businesses is one thing and was fraught with problems (is the pressure coming for the right cause and reasons?), but activists are now pursuing lasting ideological change by leveraging corporate governance mechanisms.

To do so, activists (in this case invariably from the left side of the spectrum) needed corporations to take their eyes off profitability and shareholder interests and enter the nebulous world of left-wing and now Woke politics.

To get the eyes of business owners and actors off the bottom line, they needed to convince them that they needed to consider specific non-business criteria.

Enter stakeholder capitalism.

The seeds of the ESG movement were planted in the 1960s and 1970s when so-called "socially responsible investing" (SRI) began to rise in popularity.[1] SRI involves selecting investments based on a company's social or environmental impact, as well as its financial performance. At this point, some of the standards were uncontroversial and reasonable, but as these things go, the standards became more and more problematic and ideological.

In the 1980s, the terminology shifted towards 'corporate social responsibility' (CSR) as companies were told to examine their impact on society and the environment.[2]

The underlying theme was that activists urged business actors to shift their focus away from mere profitability and shareholder value towards broader, more abstract criteria for measuring business success. As they achieved success,

> ***"The seeds of the ESG movement were planted in the 1960s and 1970s when so-called "socially responsible investing" (SRI) began to rise in popularity.***

activists continued to push forward and expand the scope of their agenda. All horrible anti-economic progress ideas seem to originate at the international level, usually in the bosom of the United Nations bureaucracy. ESG is no exception.

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The first seeds of modern ESG were planted in a 2004 United Nations report titled *Who Cares Wins.*[3] This UN report encouraged all business stakeholders to embrace the principles encapsulated in ESG standards. The report issued a call to all business actors.

It was here that ESG criteria were, for the first time, required to be incorporated in the financial evaluations of companies.[4]

For those unaware, ESG is an acronym for environment, social, and governance.

The company's traditional environmental record used to entail potential financial and legal liabilities for the company in the future. Now, it has morphed to largely mean a company's carbon dioxide emissions, even if they do not impact climate change. Social once meant a company's relationship with people, but now means the company's "right" position on the right issues, according to left-wing activists. Governance meant how the company runs itself. Often, this now includes criteria like the gender and racial composition of the company's board of directors.

Below is a table of the standard set of ESG criteria (as defined among Canadian firms) and includes one example of how each of them is defined, specifically in terms of supply chains.

Table 1

Environmental, Social and Governance (ESG) practices

Environmental	Social	Governance
• Greenhouse gas (GHG) emissions reduction practices (energy and transportation efficiency, clean energy sources) • Waste and water reduction • Ecodesign/lifecycle analysis • Biodiversity improvement	• Diversity, equity and inclusion practices • Community investments and employee volunteer program • Social integration initiatives	• Sustainable development policy • Environmental and social risk management • Sustainable development training

Source: Business Development Bank of Canada. https://www.bdc.ca/en/articles-tools/blog/esg-canada-what-data-tells-us#:~:text=In percent20Canada percent2C percent2082 percent25 percent20of percent20major,following percent20the percent20November percent202022 percent20survey.

Companies and investment firms began taking ESG standards seriously and developed metrics and ways of evaluating adherence to these standards. Firms tried to outdo each other to be seen as more 'progressive' than their competitors.

The most famous occurrence was in 2020 when Blackrock—an incredibly influential American firm that is the world's largest investment management company—issued a letter to CEOs everywhere in support of ESG investing standards.[5] To get a sense of scale and influence of this firm, back in January 2020, Blackrock had nearly $7.5 trillion in managed assets.

In his influential letter from 2022 to CEOs and businesspeople everywhere, Blackrock CEO Larry Fink stated the following:

> We also see many governments failing to prepare for the future on issues ranging from retirement and infrastructure to automation and worker retraining. As a result, society is increasingly turning to the private sector and asking companies to respond to broader societal challenges. Indeed, the public expectations of your company have never been greater. Society is demanding that companies, both public and private, serve a social purpose. To prosper over time, every company must not only deliver financial performance but also show how it makes a positive contribution to society.[6]

In this letter, Fink was making the distinct call for businesses everywhere to take their eye off the ball of profitability and shareholder value and pursue other politically charged ends. His letter was trying to make the shift towards so-called 'stakeholder capitalism' official.

Although, thankfully, there has been significant pushback[7] against this imposition of a political agenda on investing and business activity, companies globally continue to engage in ESG investing. Despite private sector and government pushback against ESG, investors and other business world stakeholders in many sectors continue to require large companies to produce copious reports on their ESG performance. Around the world, ESG reporting rates for larger firms increased from 18 percent in 2002 to 79 percent in 2022.[8]

Many large Canadian companies are buying into ESG rhetoric and believe their future and profitability depend on adopting these standards. Many businesses and researchers with a pro-ESG outlook have assembled data suggesting some degree of profitability in adopting these standards, but many of these studies are suspect. The best evidence suggests there is no conclusive evidence that investments based on ESG criteria outperform those that are not.[9] The profitability of ESG is outside the scope of this paper, but the inconclusiveness of results should put to rest that it is a driving force to leading to the adoption of such standards at all.

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The Business Development Bank of Canada (BDC) has assembled data on ESG compliance and popularity amongst Canadian businesses. Despite the inconclusiveness in profitability and the nebulous and questionable natures of these standards, Canadian firms seem determined to adopt ESG.

A BDC study published in March 2023 gave the following snapshot:

> The Business Development Bank of Canada (BDC) survey of 121 large companies and public-sector buyers found that already 82 percent require some disclosure from their suppliers on ESG, but that's expected to grow to 92 percent by 2024. The entrepreneur-focused BDC says three-quarters of the large organizations surveyed also said that, over the next five years, they plan to increase their ESG expectations in a range of areas like energy use, diversity in hiring and environmental risk management. The rising standards on smaller companies come as big companies are under pressure from investors to report a more detailed ESG picture across their entire supply chains.[10]

Despite growing pushback, all evidence points to the fact that ESG is not going away anywhere quickly. Much money and resources are invested in this enterprise. Most of the money in ESG investing comes from huge investments like pension funds, insurance companies, and endowment funds from large universities and foundations. In other words, the big institutional investors.

From an Indigenous perspective, this means there are huge dollars from a largely non-Indigenous world that is telling people not to invest in projects or activities that Indigenous players are interested in. As a modern example of eco-colonialism, activists are manipulating large companies to withdraw from projects that represent prosperity to many Indigenous communities. They state they care about Indigenous people and value their input and then proceed to adopt investing standards that lock Indigenous communities out of the modern economy.

Before continuing, it is essential to establish that rejecting ESG is not about ignoring valid issues. Concern about a company's environmental record or its commitment to good employer practices and gender and racial diversity on its board is not inherently bad. But, as per usual, left-wing activists bring in unreasonable ideological demands and not following them means that a person or organization can be labelled uncaring about the environment or racist.

Rejecting ESG doesn't mean one is not concerned about the environment, how a company is run, or how many people of colour they employ or the racial and gender composition of their board of directors. In the Indigenous case, it does not mean one is not desiring more Indigenous members on boards.

It is important to recognize that we all have different opinions on how those positive things are defined and achieved or that there are better ways of addressing them outside investment decision-making. ESG investing holds people ransom to certain definitions—invariably leftist and climate agenda-obsessed—and certain political agendas and/or groups that one may oppose as an ordinary citizen. It is simply inappropriate to inject divisive political agendas onto businesses and their internal governance.

This paper argues for corporations and investors to abandon the pursuit of ESG standards completely and return to a sole corporate focus on profitability and shareholder value. There are so many unknowns and unintended consequences that accompany bringing subjective political criteria into business decision-making.

Problems with ESG

"...left-wing activists have found common cause with businesspeople seeking to prove their political virtue or weaponize it for profitable ends...

Regardless of whether ESG delivers any tangible benefits for investors and other business actors, it is fraught with problems that come with injecting subjective criteria into profit-seeking businesses. Here are the central issues:

- The politicization of investing invites capture by various political groups and divisive agendas.
- Politicized investing always comes with highly subjective criteria and valuations.
- As identified in the Indigenous case, there are infinite ways that criteria within ESG itself conflict and contradict one another.
- ESG is often seen by minority groups, including Indigenous peoples, as 'virtue signalling' and tokenism. They are about non-Indigenous people feeling good about themselves and not about the substantive inclusion of these groups.

The problem is that when you politicize business decisions, you get captured by various political agendas vying for control. Political movements—more often than not on the political and cultural left—are eternally seeking new targets to advance their causes. They have no incentives to solve the problems they claim to remedy but instead to always find avenues to push their cause in order to endure into the future. For example, environmental groups will not make money in fundraising if they tell you how the environment is improving, which, *of course, it is.*

In this case of ESG and energy divestment, left-wing activists have found common cause with businesspeople seeking to prove their political virtue or weaponize it for profitable ends.

Often, you can get captured by the wrong sorts of causes. For example, you can go from justly boycotting apartheid-era South Africa for the good cause of ending racial discrimination to the modern BDS ("Boycott, Divestment, Sanctions") movement that seeks to single out the State of Israel for unjustified reasons, including the ludicrous accusation of apartheid in the democratic state of Israel.

The more you travel down the rabbit hole of politicization and bring subjective political values into the neutral market, the more likely you will end up in an unacceptable scenario for many people. Injecting divisive politics is always a sure way to alienate the public and undermine business. ESG is also invariably leftist in orientation, as it is always the result of left-wing activism. Thus, it will always alienate a large segment of the public.

Then, assuming even if you find worthy causes to include, how will you establish metrics to measure how you are meeting goals? All these metrics and valuations are hopelessly subjective.

Most important, however, is the recognition that ESG investing and the energy divestment efforts it entails are an example of non-Indigenous activists attempting to control the economic destiny of Indigenous communities interested in escaping poverty through the resource economy.

Eco-colonialism and ESG

"...activists often carry an anti-markets agenda that opposes economic growth and romanticizes small-scale development.

Enter another form of eco-colonialism.

Eco-colonialism refers to the practices of some non-Indigenous environmental activists to interfere or meddle in the internal affairs of Indigenous communities for the sake of a specific environmental agenda. Indigenous observers first identified this phenomenon in the context of anti-energy activism,[11] but "green colonialism" has been observed for quite a while in the context of developed countries imposing environmentalist policies on the developing world. In both First Nation and developing world contexts, these activists often carry an anti-markets agenda that opposes economic growth and romanticizes small-scale development.

In the Indigenous context, eco-colonial activists seek to impose renewable energy sources on First Nations and ignore the role of fossil fuels in eradicating energy poverty on many reserves.

The use of the term "colonialism" harkens back to the 19th century when colonial Crown authorities often placed themselves in Native communities with the intent to ensure it reflected its own Crown priorities. This was seen most notably with the insertion of an "Indian agent" within First Nation communities who would ensure the community was not straying too far from Crown objectives.

In the modern eco-colonialist reality, non-Indigenous environmentalists often insert themselves in Indigenous affairs when there is some environmental cause at stake for them. These activist groups will seek out community members who are sympathetic to their point of view and manipulate these people to their own ends.

A notable example is the Wet'suwet'en Nation in British Columbia in its conflict over the Coastal GasLink pipeline project. Despite the elected leadership's support for the project and the community's approval in a public vote, they focused solely on a faction of hereditary chiefs who were already against the pipeline project.

In the eco-colonialist context, the relationship of non-Indigenous activists and First Nation community is one colloquially seen as "fair weather friends" in the sense that the activists push back and diverge from the First Nation when it pursues their own objectives that run counter to the activist organization.

Enter ESG.

Through targeting institutional investors, environmental activists are once again undermining resource projects that ultimately help First Nations communities. It is also unavoidable that ESG and divestment acts contrary to the many First Nation and Metis communities who wish to engage in energy projects. Thus, these non-Indigenous activists are attacking the economic self-determination of Indigenous communities, all while claiming they are about "decolonization" and are helping First Nations.

Thus, focusing on ESG investment standards and through targeted divestment campaigns, ESG has become a new form of eco-colonialism.

Virtue signalling has become the new pejorative against Wokism or social justice warriors (SJWs) that publicly adopt positions or statements to demonstrate that they support the "right" causes, often in a conspicuous manner.

ESG and divestments are not largely harmless acts of virtue signalling like empty land acknowledgements; *ESG and divestments hurt Indigenous communities.*

Case Study

How ESG is harming northern Indigenous communities

...big institutional investors aimed to save Indigenous peoples of the Arctic from climate change by limiting projects that would allow them to create prosperity for themselves and join the rest of the world.

Arctic Indigenous communities provide one important case study into the negative impact of ESG and energy divestment.[12]

From the beginning, the Arctic was seen as "ground zero" for the assumed effects of climate change. As ESG standards became more common and the global investment community began to view the region as "the bellwether for global climate change" as discussions shifted towards melting icebergs and polar bears trapped on ice, investors began to boycott Arctic investments in the name of climate change.

Thus, in the true tradition of eco-colonialism, big institutional investors aimed to save Indigenous peoples of the Arctic from climate change by limiting projects that would allow them to create prosperity for themselves and join the rest of the world. Environmentalists first harmed Northern economies through their targeted disinformation campaigns against the seal hunt, and now they are harming them again through climate-driven ESG.

Moreover, ambitious plans to create an alternate viable maritime trade route through the Arctic Sea are threatened by ESG-driven boycotts by institutional investors to establish necessary infrastructure in this region. Prominent companies like Nike have signed pledges to not ship their products through an Arctic maritime route. In 2020, a major bank *pledged* to boycott Arctic resource development in the name of climate change alarmism, thereby denying project opportunities for Arctic Indigenous peoples who wished to benefit from resource development. This may make some rich investors feel about themselves, but it denies opportunities to the communities that need opportunities the most.

Jessica Shadian, president and CEO of Arctic360, an organization that works with Indigenous development corporations, Northern governments, and the private sector to attract global investment to the Arctic, has stated that these divestment efforts trap Arctic Indigenous communities in cyclical poverty.

In a prominent Canadian public policy journal, she stated that:

> In the case of the North American Arctic, much of the known gas is located in areas that are Indigenous governed and in some cases also owned. When institutional investors say no to investments, then those communities lose

> opportunities to become equity owners and grow their own economies and self-sufficiency. After all, Northerners cannot be expected to live on the sale of soapstone carvings alone.[13]

Shadian also stated that there is no empirical evidence that these investment boycotts lead to reduced emissions or have any discernible impact on climate change. Shadian was clear on the impact of investment boycotts of the Indigenous Arctic: **When institutional investors say no to investments, those communities lose opportunities to become equity owners and grow their own economies and self-sufficiency** (emphasis hers).

Of all regions, the northern Arctic is in desperate need of infrastructure projects that will improve their standards of living. Arctic communities need energy-intensive projects that allow mainstream communities in Canada to advance and grow their standard of living. But institutional investors are being asked to boycott necessary investments in the North. It is another "industrialization is good for me, but not for thee" form of self-righteous eco-colonialism that also harms the developing world. Or as Shadian put it:

> The North American Arctic needs massive capital now more than ever. There is a critical need for public-private partnerships to invest in projects to build all kinds of critical infrastructure from broadband to ports, roads, hospitals, affordable energy and airports precisely so that more—not less—goods (from food staples to building and medical supplies) can come into the Arctic. These partnerships can also help ensure the Arctic's breadth and wealth of natural resources (from fish and human knowledge to the minerals required for the global transition to the renewable energy economy) can reach global markets.[14]

Criticism from Indigenous communities and organizations

"Companies are getting smarter and realizing early and ongoing consultation and inclusion of Indigenous input is good for business and good for long-term relationships.

Many Indigenous communities have levelled criticisms against ESG in terms of Indigenous issues while often expressing well-intentioned broad sympathy for ESG. This section includes information from two Indigenous organizations that are very familiar with ESG as it applies to Indigenous communities. One involved an interview. Neither are endorsing this study or its conclusions.

The first organization is the First Nations Major Project Coalition (FNMPC), a national organization that assists First Nations in engaging in major projects on their territories. This neutral organization provides non-partisan advice to Indigenous communities interested in projects and actively promotes environmental stewardship of these projects. Despite supporting ESG in principle and practice, the FNMPC released a report in 2021 that critically examined the state of ESG at the time.[15]

The FNMPC deemed that the main ESG reporting standards lacked Indigenous "notions and viewpoints."[16]

The FNMPC report also highlights the growing interest among investors and proponents in First Nation equity stakes and ownership in major projects. This marks the highest level of project ownership achieved by Indigenous groups, which pre-dates and is unrelated to ESG standards.

The FNPMC report acknowledged that: "Early engagement with Indigenous nations, for the purposes of aligning with their existing goals, is already becoming the norm for project proponents looking to invest, develop or build in Indigenous lands and waters."

This has already become the norm for project proponents due to the duty to consult and accommodate Indigenous people's legal doctrine and evolving best practices. This practice of better consultation has nothing to do with modern ESG standards or any such metrics or valuations. Proper consultation with Indigenous communities and the desire to "get it right" in this area to build relations with First Nations and avoid constant litigation pre-dates ESG by a long shot. Companies are getting smarter and realizing early and ongoing consultation and inclusion of Indigenous input is good for business and good for long-term relationships.

The First Nation LNG Alliance—a collection of First Nations supportive of LNG and other energy source development in British Columbia—has also voiced support for ESG standards in principle and is not necessarily endorsing this study or its conclusions. However, this organization has also voiced problems with existing ESG reporting standards.

In an interview, Karen Ogen, CEO of the First Nation LNG Alliance, made the following observations about existing ESG standards:

> We at the First Nations LNG Alliance are all in favour of the PRINCIPLE of ESG—corporate environmental, social, and governance standards. The problem in PRACTICE is that the standards and rules are far too often built without input or approval from Indigenous peoples. Far too many companies design and publicize their ESG programs without consultation with Indigenous communities ... without taking into account the rights of Indigenous peoples ... and without looking into the potential for impact on Indigenous communities. The First Nations Alliance has worked with a number of companies that recognize Indigenous needs and values. But other companies often plan their ESG programs behind closed doors. So, too often, Indigenous issues are considered important only when a court action or formal complaint is initiated by Indigenous people against the company. Or when a company lawyer learns that the firm actually has some legal duty to consult.[17]

If anything, current ESG reporting standards demonstrate a clear tendency towards the eco-colonialism mentioned earlier. Project standards are set without Indigenous input and the projects are not vetted by First Nation communities and/or groups themselves. Non-Indigenous activists and investors are the ones determining what is best for Indigenous communities. Killing projects that will advance Indigenous communities does not appear to concern them.

Rather than worry about improving ESG standards or creating an unattainable "ISG-I" standard, Indigenous communities would be better served working with governments and the private sector to secure investment capital.

Abandoning ESG altogether will free up time and effort for Indigenous communities and groups to build better relationships with private sector proponents who want to partner with them.

As stated before, ESG standards will always be hostile to many resource projects, especially if they involve energy. ESG standards were birthed in hostility to fossil fuels based on zealous climate change alarmism, and if made to choose, ESG standard proponents would jettison their commitment to Indigenous communities in pursuit of that agenda.

"...ESG investing standards invariably aim to keep resources in the ground and scuttle energy projects.

The E part of ESG is diametrically opposed to meaningful First Nation economic self-determination. Thus, it would undermine the case for an ESG-I or any reformed ESG framework.

Undermining Indigenous economic self-determination through ESG is not worth any possible addition of Indigenous members on a board of directors or having an Indigenous person or group vet a project proposal.

As shown above, if Indigenous communities (First Nation, Metis or Inuit) wish to engage in energy projects that involve fossil fuels, ESG investing standards invariably aim to keep resources in the ground and scuttle energy projects. Indigenous communities engaged in energy projects warn about the consequences of ESG thinking and are feeling the effects of such campaigns. Indigenous communities that are not engaged in energy projects or are engaged in renewable energy projects can even see how these ESG standards attack fellow Indigenous communities that have made decisions to develop their economies using fossil fuels.

Unfortunately, Indigenous communities or organizations that support an ESG-I alternative or just believe that engaging with Indigenous communities much more often in developing ESG standards would find that they would always come up against activists who are determined to use ESG to engage in their eternal warfare with fossil fuel energy.

In terms of reconciling Indigenous interests with ESG, it is really an exercise in putting lipstick on a pig. Adding a more robust Indigenous element would not address how ESG itself undermines Indigenous engagement in the resource economy.

Conclusions

ESG standards represent a new manifestation of the eco-colonialism we have seen in recent decades. This trend is for non-Indigenous activists to infiltrate Indigenous communities and co-opt communities that are seeking opportunities in the resource economy. These activists do not care that these Indigenous communities wish to pursue energy projects. They only care when certain segments of an Indigenous community agree with their ideological goals.

With ESG, activists have successfully built inroads with large businesses to adopt certain criteria for corporate governance and investing. Invariably, these ESG standards involve climate change targets openly hostile to energy development. Indigenous communities are in regions where energy development is often the key to escaping poverty. However, ESG investing and the energy divestment it often involves is undermining Indigenous engagement with the energy sector. This study presented the Arctic as one notable example where ESG thinking has led to a direct lack of investment in the North, locking these communities in poverty for the sake of a climate agenda.

Indigenous communities and groups have recognized that ESG investing standards often lack true Indigenous input and voice. However, many Indigenous groups seek to improve ESG standards to include Indigenous voices. This study respectfully requests Indigenous groups and communities to reconsider this goal and to abandon ESG altogether. ESG itself is fraught with problems from the start, including injecting divisive politics into business and pursuing nebulous and hopelessly subjective criteria.

Improving ESG is akin to putting lipstick on a pig.

Most importantly, ESG's anti-energy goals are diametrically opposed to the realization of Indigenous economic self-determination. Project proponents and business leaders are already improving consultation with First Nations, to the point where project equity ownership is now on the table. These are developments that came despite ESG. This study is an impassioned plea for Indigenous players to focus their time and resources on building relations with companies and securing investment capital to engage in projects.

The road to Indigenous prosperity does not run through ESG. It never has.

"...ESG investing and the energy divestment it often involves is undermining Indigenous engagement with the energy sector.

Policy Recommendations

- Governments and Indigenous groups recognize that ESG itself actively harms Indigenous communities that are engaged in the energy sector. ESG is an insult to Indigenous economic self-determination as even an "ESG-I" will never mean standards that don't include climate change, which is always overtly hostile to the energy sector.
- Respectfully, Indigenous communities and groups should reject the pursuit of "ESG-I" altogether and abandon hope of a modified ESG that claims to "better represent" Indigenous input. ESG itself is the problem, not just the lack of Indigenous participation in it.
- Governments and Indigenous communities focus on better consultation and accommodation of Indigenous communities that wish to engage in resource projects. Recognize that Indigenous communities have diverse values and interests and reject eco-colonialism that assumes all Indigenous peoples are all the same.
- Indigenous and third parties should pursue equity ownership for Indigenous communities in resource projects instead of ESG. Indigenous communities should work directly with private parties to increase Indigenous representation and better include Indigenous input in projects.

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The Frontier Centre for Public Policy is an independent, non-profit organization that undertakes research and education in support of economic growth and social outcomes that will enhance the quality of life in our communities. Through a variety of publications and public forums, the Centre explores policy innovations required to make the prairies region a winner in the open economy. It also provides new insights into solving important issues facing our cities, towns and provinces. These include improving the performance of public expenditures in important areas such as local government, education, health and social policy. The author of this study has worked independently and the opinions expressed are therefore their own, and do not necessarily reflect the opinions of the board of the Frontier Centre for Public Policy.

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