



Lubicon Lake Band No. 453

Box 1351
St. Isidore, Alberta
T0H 3B0
Treaty #8 Territory

May 14, 2025

Impact Assessment Agency of Canada (IAAC)
Canadian Nuclear Safety Commission (CNSC)
Via email: PeaceNuclear-NucleairePaix@iaac-aeic.gc.ca

Subject: Energy Alberta Peace River Nuclear Power Project (Ref # 89430)

To whom it may concern,

On behalf of Lubicon Lake Band No. 453, we write to express our initial concerns and observations regarding the proposed Peace River Nuclear Power Project by Energy Alberta. This proposed development is situated within the Territory of Lubicon Lake Band No. 453, a region that holds profound cultural, spiritual, and subsistence significance to our people. We have relied on the Peace River and surrounding lands since time immemorial for hunting, fishing, trapping, gathering, navigation, ceremony, and other cultural practices. The Peace River is a sacred river that has provided sustenance and spiritual connection for countless generations of our members.

We wish to emphasize that any proposed project within our Territory must respect our Aboriginal and Treaty rights as recognized and affirmed under Section 35 of the Constitution Act, 1982. The proposed Peace River Nuclear Power Project has the potential to significantly impact these rights, yet we are deeply concerned by the lack of meaningful consultation and accommodation to date. Lubicon Lake Band No. 453 operates under the principles of Free, Prior, and Informed Consent (FPIC) when evaluating major projects in our Territory, and we expect these principles to be upheld in all engagement processes. Moreover, we are particularly concerned by the rushed timelines imposed for submitting comments on the Project Description. Comments were required to be submitted prior to funding being awarded, a process that is fundamentally inconsistent with the principles of meaningful consultation. Furthermore, the current funding allocation limit of \$8,000 is

wholly inadequate for comprehensive participation in a project of this magnitude. It does not allow for the necessary capacity to fully review, assess, and respond to potential project impacts on our rights, interests, and cultural practices.

Despite the rushed timelines, Lubicon Lake Band No. 453 will provide some high-level concerns based on its initial review of the Summary Project Description. The Peace River Nuclear Power Project raises serious concerns about potential environmental impacts on the Peace River watershed, a critical ecosystem that sustains the cultural, subsistence, and spiritual practices of Lubicon Lake Band No. 453. Specifically, we are concerned about the following potential impacts associated with the Peace River Nuclear Power Project:

1. Impacts to Rights and Land Use:

- The proposed project site is located in an area actively used by Lubicon Lake Band No. 453 members for traditional practices, including hunting, fishing, trapping, gathering, and spiritual activities.
- The construction and operation of the nuclear facility may result in restricted access to culturally significant sites, potentially infringing on our Treaty rights to harvest and utilize these lands.
- Potential contamination of land and water resources, particularly in the event of a radiological incident, would pose severe risks to our ability to exercise our rights to hunt, fish, and gather, as well as to maintain our traditional way of life.
- Impacts to Fish and Wildlife: the Project will alter and potentially contaminate local fish and wildlife populations which we rely for sustenance.

2. Impacts to Cultural and Spiritual Sites:

- The Peace River and its surrounding areas hold profound cultural and spiritual significance to Lubicon Lake Band No. 453. Specific sites within the proposed project area are used for ceremonies, spiritual practices, and community gatherings. A Project of this nature will also fundamentally and permanently alter our relationship with the land, and thus the exercise of our Treaty and Aboriginal rights.
- The introduction of a large industrial facility, including infrastructure, road construction, and potential exclusion zones, would disrupt these sites, diminishing their spiritual value and potentially displacing important cultural practices.

- Increased industrial traffic and noise pollution may also disturb wildlife populations, further impacting our cultural connection to the land and the natural environment.

3. Environmental Impacts and Ecosystem Disruption:

- **Thermal Pollution:** The CANDU reactor cooling process involves the discharge of heated water into the Peace River. Elevated water temperatures can alter aquatic ecosystems, impacting fish populations that are integral to our traditional diet and way of life.
- **Radioactive Waste Management:** The production, storage, and transportation of radioactive waste pose significant risks to the surrounding environment. Even minor leaks or spills could result in contamination of water resources, soils, and vegetation relied upon by our members.
- **Water Withdrawals and Flow Alterations:** The project's water usage requirements could alter Peace River flow patterns, impacting fish migration routes and affecting traditional fishing practices.
- **Risk of Accidents and Radiological Releases:** The proposed site is in a region prone to extreme weather conditions, including flooding and severe storms. Such events could increase the risk of accidents, potentially resulting in the release of radioactive materials. Given the proximity of the project to the Peace River, any such release could have catastrophic and long-lasting consequences for water quality, fish populations, and human health.
- **Habitat Fragmentation and Land Disturbance:** The construction and operation of the project will involve significant land disturbance, potentially fragmenting habitats, disrupting wildlife migration routes, and limiting access to traditional harvesting and cultural sites used by our members.
- **Cumulative Environmental Impacts:** The Peace River region is already impacted by extensive industrial development, including oil and gas extraction, forestry, and hydroelectric projects. The introduction of a nuclear power plant would further compound these impacts, straining the ecosystem and increasing the risk of cumulative environmental degradation.

We are also concerned about the lack of meaningful engagement and consultation by the Proponent, Energy Alberta, regarding the Peace River Nuclear Power Project. To date, Energy Alberta has not undertaken adequate efforts to engage Lubicon Lake Band No. 453 in a manner consistent with the principles of Free, Prior, and Informed Consent. This lack of early and ongoing engagement undermines our ability to fully understand the potential impacts of the proposed project on our rights, cultural sites, and traditional land use areas.

Furthermore, we question the Proponent's capacity and wherewithal to construct and operate a nuclear power facility of this scale, given their lack of demonstrated experience with complex nuclear projects and the associated environmental and safety risks. The absence of a proven track record raises serious concerns about the Proponent's ability to effectively manage the technical, environmental, and cultural complexities inherent in the proposed development, particularly in a sensitive and culturally significant area such as the Peace River watershed.

Given the potential impacts of the proposed project, Lubicon Lake Band No. 453 requests the following:

1. **Extended Timelines and Additional Funding:** Extend the comment period to allow for thorough review and provide adequate funding that reflects the scale of the project and the potential impacts to our rights and interests.
2. **Enhanced Consultation and Engagement:** Develop a comprehensive consultation and accommodation plan, co-designed with Lubicon Lake Band No. 453, to ensure that our concerns are meaningfully addressed throughout the assessment process.
3. **Comprehensive Environmental Impact Assessment:** Conduct an in-depth, independent environmental impact assessment specific to the Peace River ecosystem, with particular focus on the cumulative impacts of thermal pollution, radioactive waste, and water usage.
4. **Capacity-Building Support:** Provide sufficient funding and resources to enable our participation in technical and environmental reviews. This must include funding for a fulsome Indigenous Knowledge and Land Use Study.

Lubicon Lake Band No. 453 is committed to engaging in good faith and in accordance with our inherent rights and responsibilities. We look forward to your prompt response and to establishing a clear, respectful, and inclusive consultation process regarding the Peace River Nuclear Power Project.

Sincerely,

<Original signed by>

Chief Billy Joe Laboucan
Lubicon Lake Band No. 453