



BEAVER FIRST NATION

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May 14, 2025

Impact Assessment Agency of Canada

Email: peacenuclear-nucleairepaix@iaac-aeic.gc.ca.

Dear Impact Assessment Agency of Canada,

Re: Beaver First Nation Questions and Comments on the Initial Project Description for the Proposed Peace River Nuclear Power Project

Thank you for proving Beaver First Nation with the opportunity to provide comments in relation to Energy Alberta's proposed Peace River Nuclear Power Project's Initial Project Description.

Alberta Energy is proposing the construction of four CANDU MONARK (two twinned) nuclear reactors, located approximately 30 kilometres north of the Town of Peace River, Alberta. As outlined in the Initial Project Description, the Peace River Nuclear Power Plant Project would cover up to 1,424 hectares in area and provide up to 4800 megawatts of nuclear power in Alberta over an operation period of approximately 80 years. If approved, the energy generated would be sold to Alberta consumers and industry through Alberta's electrical grid. The proposed Project would be the first nuclear generating plant to be proposed and constructed in western Canada and Alberta.

An integrated impact assessment for the Project will be conducted jointly by the Impact Assessment Agency of Canada (IAAC) and the Canadian Nuclear Safety Commission (CNSC) subject to the *Impact Assessment Act (IAA)* and the *Nuclear Safety and Control Act (NSCA)*. Throughout the integrated impact assessment process, IAAC and CNSC will be responsible for conducting oversight and reviews of Energy Alberta's engagement activities with each potentially impacted Indigenous Nation.

Beaver First Nation is made up of two reserves: Boyer River 164 and Child's Lake 164A. Beaver First Nation is located approximately 50 km east of High Level and 15 km west of Fort Vermilion, Alberta. The Nation serves more than 1300 members, with approximately 48% of members living on one of the two reserves. The Nation is governed by one Chief and four Councillors. Services include: finance, public works, medical transportation, health, registration and consultation. Beaver First Nation is party to Treaty number 8 which was signed in 1899.

As Long as 'The Sun Shines, 'The Grass Grows and the Rivers 'Flow



In *Fort McKay First Nation v. Prosper Petroleum Ltd.*, 2019 ABCA 14, the Court reaffirmed important principles in relation to the implementation of Treaty 8, including that:

- the honour of the Crown extends beyond the duty to consult;
- the Government of Alberta (GOA) must act in a manner which advances the intended purposes of Treaty 8; and
- regulatory agencies are obligated to consider impacts on Inherent and Treaty rights when determining whether a project is in the public interest.

Treaty 8 constitutes a Nation-to-Nation relationship with the Crown and no decisions should be made which are inconsistent with the underlying purpose of Treaty 8.

Beaver First Nation has reviewed Energy Alberta's Initial Project Description for the proposed Peace River Nuclear Project and asks the following questions:

- How will the Principles of the United Nations Declaration on the Rights of Indigenous People (UNDRIP) be considered and addressed in the assessment and decision-making segments for the Project's review?
- How will the proposed Project's construction and long-term operation adversely impact our inherent and Treaty and Aboriginal rights, culture and way of life?
- What impact will the proposed Project have on wildlife and furbearers that we rely on for sustenance?
- Will Energy Alberta assess and manage cumulative effects using a pre-industrial baseline to assess the past, current condition to measure the present and all future potential impacts to measure the future?
- What risks does the Project pose to our People's health and safety as well as our neighbouring Nations' health and safety?
- What are the potential impacts from a wildfire burning near or on a nuclear reactor?
- What are the exposure risks to human, wildlife, furbearers and birds in relation to nuclear waste stored in bins at a large industrial site on our territory?
- What are the current cancer rates for those people who were living around Chernobyl and Fukushima when those catastrophes took place?
- Why is planning for catastrophic events not mentioned in the Initial Project Description?
- Why would Energy Alberta propose constructing nuclear reactors in an earthquake zone?
- Given the unstable slopes on the Peace River, why would Energy Alberta propose constructing nuclear reactors near the Peace River?
- What would happen if a truck hauling nuclear waste collided with another large vehicle or object while hauling nuclear waste to northern Ontario? Does Canada have a permanent disposal facility for Nuclear Waste?
- What are the long-term projections of water quantity and flows for the Peace River? And, why wasn't Site C mentioned in the Initial Project Description as a third hydroelectric dam on the Peace River? Note: Site C affects the flow regime of the Peace River and will alter the numbers in the Initial Project Description.
- How will drawing thousands of cubic metres of water out of the Peace River affect downstream Nations and those who use the Peace River for travel?

- Will an Indigenous led Environmental Assessment be undertaken for the Project?
- What are the potential socio-economic effects of the Project?
- What are the economic benefits being proposed for the Project?
- Why are energy transmission lines (power lines) not mentioned in the Initial Project Description? And, how are these being incorporated into assessing and managing cumulative effects for the Project?

Beaver First Nation has grave concerns regarding the enormous amount of energy needed to develop a nuclear reactor? For example, the amount of metal and concrete that has to be produced to build the plant, the vast amount of fossil fuels emitting from construction equipment. And, the process of mining and refining uranium ore takes a lot of energy. Furthermore, Nuclear power plants are not 100% efficient, meaning that they use a portion of the energy they produce to operate. The average efficiency of a nuclear power plant is around 33%, meaning 33% of the energy produced is converted into usable electricity, while the remaining 67% is lost as heat.

Those downstream (including our Nation) of the Site C Dam immediately experienced effects from river levels dropping drastically. If a nuclear plant were to be built, once again those downstream will be facing risks of not only water levels dropping, but changes in water temperature, river fish being affected and now the risks of potential contamination.

Beaver First Nation would appreciate answers to our aforementioned questions in relation to Energy Alberta's proposed Nuclear Power Project. Following answers to our questions, we will then meet with our membership to discuss.

Sincerely,
Original Signed

Dustin Thacker, Consultation Consultant
Beaver First Nation

cc. Beaver First Nation Chief and Council
Kieran Broderick, Land and Resources Advisor