



May 14, 2025

Peace River Nuclear Power Project
Impact Assessment Agency of Canada
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Re: Peace River Nuclear Power Project, Project Reference Number: 89430; Initial Project Description Comments and Concerns

Dear Impact Assessment Agency of Canada,

This letter and two attached appendices provide Woodland Cree First Nation's (Woodland Cree or WCFN) comments on the Initial Project Description (IPD) for Energy Alberta's (or the Proponent) Peace River Nuclear Power Project (PRNPP or the Project).

About WCFN

Woodland Cree is a signatory to Treaty 8 with four reserves in northern Alberta (Cadotte Lake, Simon Lake, Golden Lake, and Marten Lake). We have a membership of 1032 people, with approximately 750 people living on our First Nation reserves. WCFN is a pro-development Nation, with established relationships and operating companies working in oil and gas, forestry, and other sectors, but we insist that development in our territory must be pursued in a way which respects our rights and responsibilities to ensure that our ancestral lands and waters are maintained for future generations.

Relationship with Energy Alberta

Significantly, the Project is literally on the doorstep of our Nation. Both options proposed by the Proponent are within 40 km of Cadotte Lake, the reserve where most of our people live, and within the lands where we exercise our rights. We are likely to be the most directly affected First Nation if the Project proceeds.

We note that this is also an unprecedented project type in Alberta, using technology that has yet to be constructed at scale anywhere, with a price tag of over \$30 billion, that would be located in the heart of Woodland Cree's traditional territory. If it proceeds, it will operate for the better part of a century. And it is not just any project - it is a nuclear power plant. This in and of itself has resulted in significant concerns among our members and is likely to raise substantial Indigenous and public concern across the region.

Over the past year, Energy Alberta has begun engaging with our Nation, but we consider these efforts to be preliminary. We appreciate Energy Alberta's initial outreach efforts, and recognize that they have demonstrated an interest in building a positive relationship with Woodland Cree. These efforts have included both technical and relationship-building meetings, one site visit, and a trip for Woodland Cree leadership to the Darlington facility to familiarize us with what an operating nuclear plant looks like.

These are important first steps, but there is much work to be done to build a relationship between Woodland Cree and Energy Alberta. Given the significance and scale of this Project, our expectations are that engagement with Energy Alberta will be similarly scaled. Fully understanding our concerns and being able to address them meaningfully will require significant and sustained work by Energy Alberta.

At this time, there are no formal agreements between WCFN and Energy Alberta about how they will engage with our people, work with our leadership, or understand and address the significant impacts that are likely to arise as a result of the Project. While there have been some preliminary meetings and opportunities for us to ask general questions or raise general concerns about the proposed Project, there is no Indigenous Engagement Plan between Alberta Energy and Woodland Cree, and no funding arrangements are in place to support the deep consultations, studies and technical review that Woodland Cree will require to fully engage with Energy Alberta and meaningfully participate in the regulatory process. We appreciate the fact that Energy Alberta's initial outreach efforts have been positive and respectful, and while we are hopeful that their engagement will deepen, Woodland Cree will require formal agreements as this process continues. This project is too significant, and has too many potential serious impacts to our rights, to rely simply on the Proponent's promises about wanting to build a positive relationship.

We expect Energy Alberta to address the concerns set out in this letter and our other correspondence with them, and enter into a formal process with Woodland Cree that will enable us to fully engage with them about this Project, and ensure that our rights and interests are properly protected by written agreements between Energy Alberta and our Nation. We know that IAAC itself has strongly recommended that proponents use Phase Zero, the Pre-Planning Phase that is not on the federal IAA timeline, to build strong relationships, gather as much information as possible about the location and affected parties (especially Indigenous groups), and build the bilateral processes necessary for a meaningful assessment. The use of Phase Zero by Energy Alberta could have been improved.

While we appreciate the engagement that has taken place so far, now that Energy Alberta filed an IPD, the clock has started on the 180 days for Phase 1, the Planning Phase of the federal impact assessment (IA) process. Frankly, 180 days is not enough time to complete the scoping process for this IA, enter into meaningful relationship between Woodland Cree and Energy Alberta, define the necessary information required for the Tailored Impact Statement Guidelines (TISGs), complete a meaningful Indigenous Engagement and Participation Plan with IAAC and the Canadian Nuclear Safety Commission (see further discussion below), scope and fund the necessary studies and Woodland Cree's required role within them, among many other steps.

Indeed, the while Proponent has identified two potential alternative locations for the Project, Energy Alberta has not engaged Woodland Cree in the conduct of anything resembling the required multi-party, multi-attribute alternative means assessment required for such a project.

From Woodland Cree's perspective, the start of the 180 day clock puts unnecessary pressure on all parties, and has the potential to strain relationships that are only beginning to be established. Given limits in the federal legislation, we believe that that the best option in the circumstances would be for Energy Alberta to request a pause to Phase 1 until there is a process agreement in place between Energy Alberta and the Woodland Cree. Woodland Cree has also written separately to Energy Alberta with this request.

Relationship with the Crown

Any time the Crown is contemplating conduct that may adversely impact Aboriginal or Treaty rights, it is under an obligation to consult and accommodate, with respect to those potential impacts. For a project of this magnitude, with such serious potential consequences for WCFN's s.35 rights, a full assessment of the Project's impacts on Indigenous rights must be completed before consultation can be discharged. It is critical that the assessment is focused on Woodland Cree First Nation rights and not be limited to an assessment of environmental impacts. Environmental indicators are not a proxy for rights. Moreover, such an assessment of

impacts to rights must consider how the proposed activity in question will impact an Indigenous community's cultural security and continuity.

Before such an assessment can be undertaken however, it is critical to obtain information on:

1. The conditions that support Woodland Cree's exercise of rights; and
2. How historic, existing, and approved activities have affected those conditions that support Woodland Cree's exercise of rights.

Given the importance of assessing the impact of the Project on Woodland Cree's rights and culture, many of the comments provided below are aimed at ensuring that the information needed to conduct a deep assessment in this regard is collected.

Given the likely impacts to Woodland Cree's rights and culture and other impacts of concern within federal jurisdiction, **Woodland Cree expects to be treated as a "most affected First Nation" throughout this IA process, and have a critical role in the scoping, impact assessment and decision-making in relation to the Project, regardless of which location is chosen.** Both locations are in the heart of Woodland Cree's territory, and will have similar impacts on our people. These facts have been shared with the Proponent. These participatory rights in the IA process are essential and are in addition to WCFN's expectation that the Crown fulfill the duty to consult and accommodate at the highest end of the *Haida* spectrum in recognition of WCFN's established treaty rights in the affected area, and the significant breadth and depth of likely adverse impact to those rights from the project.

A project of this nature, scale and location will require Woodland Cree's free, prior and informed consent (FPIC). We will expect to hear more details from the Proponent, IAAC and the CNSC, respectively, as to their commitments to respect and adhere to whatever FPIC decision Woodland Cree makes in relation to the Project. In particular, we note that there is no longer room to doubt the applicability of UNDRIP, and the right of First Nations to give (or withhold) their free, prior and informed consent, following several recent decisions of the Supreme Court of Canada¹ and the Federal Court.²

Notably, Woodland Cree has yet to hear anything from the Province in relation to the proposed Project. Woodland Cree notes that Alberta has potential impacts and responsibilities to Indigenous Nations that will need to be actively integrated into the assessment as well, and we need confirmation of – and meaningful consultation about – Alberta's proposed role in the impact assessment.

¹ For example, *Reference re An Act respecting First Nations, Inuit and Metis children, youth and families*, 2024 SCC 5 at para 4.

² *Kebaowek First Nation v Canadian Nuclear Laboratories* 2025 FC 319 at paras 76, 86, 128.

Irrespective of how Alberta chooses to participate in the impact assessment, it is Woodland Cree's full expectation that both the federal and provincial Crowns will fully involve WCFN on a government-to-government and Nation-to-Nation basis in the impact assessment. This includes providing for WCFN involvement in decision-making at each step of the assessment, including the development of the Tailored Impact Statement Guidelines (TISG) for the Impact Statement (IS), the selection and appointment of the panel members, and ensuring that the study and assessment of baseline and trend-over time conditions for Indigenous peoples will be led by our Nation (together with other participating Indigenous peoples) so that the direct, indirect and cumulative impacts on our lands, rights and ways of life are fully understood from our perspectives, not those of the proponent or their consultants.

We will insist on demonstrable adherence to not just Canada's guidance on impact assessment, but also best practices from an Indigenous perspective, drawing on leading examples of effective and respectful process within Canada and internationally. We look forward to a discussion with Canada about how this will be achieved. It is essential that decisions on these processes and frameworks are not made without meaningful input and guidance from WCFN. As a first step towards ensuring that the Crown's obligations are met, the Federal decision-makers and WCFN should meet to plan the upcoming steps in the process. By collaborating and ensuring that WCFN is engaged from this early stage, and continuing throughout, it will be more likely that our mutual expectations can be achieved.

Woodland Cree Comments on the IPD (Appendices 1 and 2)

Woodland Cree First Nation notes that IAAC has requested comments on four main topics in the review of the IPD:

1. Potential Effects;
2. Potential Effects on specific sub-populations (i.e., GBA+);
3. Potential Benefits; and
4. Areas of Concern.

Woodland Cree comments in Appendix 1 address these topics. Given the very high-level nature of the IPD and the marked lack of meaningful engagement during Phase Zero, all such comments must be considered preliminary and partial in nature.

In addition to the information requested by IAAC, we have also provided information on the following in Appendix 1:

5. Process Steps and How Woodland Cree Wants to be Involved;
6. Information Gaps to Be Filled; and

7. Studies that may be Required, and Woodland Cree's Desired Role.

Each of these seven topics are addressed in turn, with reference to what section of the IPD the issue/expectation/requirement is linked to. Obviously, there may be some overlap between topics identified by IAAC and additional ones added by Woodland Cree.

Where Woodland Cree identifies a requirement, it is our expectation that the IAAC will include this in its Summary of Issues and require the Proponent to address these gaps in its forthcoming Detailed Project Description and or Impact Statement (through a TISG requirement). In all cases, even where IAAC believes that it understands our expectations as clearly set out in this submission, **Woodland Cree requests that the IAAC consult directly with our Nation on our requirements and issues identified in Appendix 1.**

Appendix 2 identifies specific IPD requirements identified in IAAC guidance, and Woodland Cree's perspective on the adequacy of the IPD's integration of material to meet those requirements. Please note that any comments on the IPD requirements should be understood to be preliminary, and that Woodland Cree considers the IPD to be inadequate. To address this inadequacy, substantial additional information must be brought forward during the Planning Phase (which requires a Proponent-requested pause period) on topics including but not limited to:

- Studies required to complete the IA and the role of Indigenous groups in those studies;
- More detail on early engagement with specific Indigenous groups to help judge the adequacy of that early engagement;
- Information on how cumulative effects will be defined, where cumulative effects data will be sourced, and what sources of cumulative effects will be considered within the cumulative effects assessment, in addition to the Project itself;
- Whether and how alternative means assessments, including siting work, has been completed, and the role of Indigenous peoples in determining the valued components and weighting used for such assessments and making the resulting determinations;
- How Indigenous Knowledge will be gathered and integrated, especially in the effects characterization, cumulative effects analysis, and significance estimation process; and
- What Indigenous guidance the Proponent is committed to adhering to in developing its Impact Statement (IS);

A Note on the Timing Pressures of Phase 1

The purpose of Phase 0 – the Pre-Planning Phase - is to make sure the Proponent is doing the early work necessary to avoid undue pressures on Indigenous groups and other parties during the very short 180-day period that is the legislated Phase 1. As noted above, Energy Alberta has not met WCFN's expectations for Phase 0 prior to the submission of the IPD, and has instead started the 180 day "federal clock" without meaningfully engaging with WCFN and taking steps to ensure that WCFN's feedback could be developed, collected, and considered in the requisite timeframes.

This creates intensive pressures on WCFN. The studies that the Proponent is committed to doing (TKLUS, socio-economic studies, GBA+, to name a few), together with the additional work identified by Woodland Cree in Appendix 1, will take time to complete, and are essential to ensuring that the impact assessment for the project is comprehensive and accurate. Given community capacity limits, the multiple required studies cannot be completed all at the same time, and likely will need to be staged. Further, proper assessment is iterative, as the results of one round of studies may lead to the need for additional follow-up studies (e.g., baseline studies may lead to the need for impact characterization and residual impact determination studies).

Energy Alberta and Woodland Cree have not yet addressed the scope, staging, funding or other aspects for any of the studies required to fully characterize the effects of this Project. To be clear, Woodland Cree will not compromise the quality of the work required to evaluate the impacts of a major Project that will have impacts on our lands for generations in order to meet an artificial timeline like "three years", whether or not such timelines are mandated by the proponent (as noted by Energy Alberta in the IPD) or because the Government of Canada has an aspiration to "speed up" such projects. The assessment needs to be done right more than it needs to be done "right now". WCFN is committed to engaging in good faith with the Proponent and the Government of Canada to participate in the impact assessment process, provide the results of its studies and support the analysis of impacts to its rights. WCFN expects that the Proponent and the Government of Canada will similarly ensure that their engagement with us is in good faith, recognizes the need to do this work right and respectfully, even if doing so may take more than an arbitrary amount of time set out in the documentation.

Further, there are some serious uncertainties associated with the Project that still need to be addressed now before Phase 1 proceeds, given that the opportunity to do this work during Phase 0 was missed:

1. MONARK reactors have never been built at this scale, and Woodland Cree needs to be convinced that these massive reactors can be constructed and operated safely. We believe that WCFN members need much more information about the

Project than they currently have. To that end, we are proposing to undertake a community consultation process, where our members can access information, ask questions and express their views about the Project in our community;

2. The two locations have not been verified as preferable or even acceptable from a Woodland Cree perspective, despite Woodland Cree identifying early the need for the Proponent to engage with it on site selection. No proper Indigenous-driven alternative means assessment has been conducted;
3. The primary customer base for this energy has not been confirmed by the Proponent. However, given the probability that power from the Project will be sold to oil sands producers, the “net zero” claims made about the Project will require a full life cycle analysis of both how the energy is produced and how the energy is consumed;
4. There is an extremely high amount of Indigenous and public concern associated with the transport of nuclear material, the risks of accidents or incidents during Project operation, and the future storage and disposal of waste from the Project. Given that this Project would be Alberta’s first and only full scale nuclear reactor, these concerns will need to be addressed. To date, there have been no such efforts beyond initial meetings, and far more work will be required
5. Details on the proposed location, impacts, and scale of additional electrical transmission capacity from the site to customers are not laid out in the IPD, despite the fact this could have a high linear and areal disturbance impact on the environment. For the record, Woodland Cree is opposed to any form of “project splitting”. This IA will require assessment not only of the plants but how they get their energy to market; and
6. It is unclear where and how fuel will be transported, and the radiological wastes, including high-level waste (HLW), intermediate-level waste (ILW) and low-level waste (LLW), will be transported, stored and disposed of, and on what timeline. Unless and until Canada has one or more deep geological repositories, there are no guaranteed safe disposal sites, especially for ILW and HLW. Woodland Cree will require assurances that the Project will not turn our traditional territory into a waste site by default.

Each of the above uncertainties and others make this a unique, complex, large scale impact assessment process. It is important to get Phase 1 done right as a result. **Woodland Cree reiterates that the onus is on the Proponent to pause Phase 1 until deeper engagement can occur on a variety of topics.** WCFN requires a much better understanding of the technical issues associated with the Project, and we would like Energy Alberta to better understand our key concerns. We think that this can be accomplished by a pause in the federal assessment to enable WCFN and Energy Alberta to undertake a joint process involving technical experts and Indigenous Knowledge holders to resolve some of our concerns directly and in advance of the formal IA process.

Extensive Need for Studies and Assessments with Deep Woodland Cree Involvement

There is a high potential for impacts on Woodland Cree's way of life, culture and rights practices, food security, use of the Peace River, and health, social and economic conditions from building a major nuclear reactor in the heart of our traditional territory. This is the case both in the normal course of planned operations and, to a higher magnitude, if a major failure were to occur in relation to the Project. Thus, serious studies and assessments with strong Woodland Cree involvement are necessary to understand these risks prior to Woodland Cree making its necessary free, prior and informed consent decision in relation to the Project. Engaging in this work before the Project gets too far down the planning timeline, ensuring the studies and engagement are robust, responsive to WCFN's concerns, and account for the significant potential lifespan of the Project will be essential to providing the necessary feedback so that any consent decision made by WCFN will be 'informed' and reasoned. Potential required studies may include but are not necessarily limited to:³

- A multi-party, multi-attribute alternative means assessment to attempt to identify a preferred location for the facility (this is an early priority in the IA);
- Woodland Cree traditional knowledge and land use baseline study, including on-territory mapping in the Project affected area;
- Woodland Cree alienation and loss of use study in the Project Case, including community preference survey work;
- Updated cumulative effects assessment work for the Peace River and related watershed;
- A country foods production, consumption and food security study;
- A risk perception/psychosocial impact assessment of effects from building a nuclear power plant in our territory;
- Socio-economic baseline and effects characterization study, specific to Woodland Cree;
- Indigenous determinants of health-based health impact assessment, not limited to a human health risk assessment;
- Woodland Cree contributions to a GBA+ study, with emphasis on impacts on vulnerable sub-populations of economic growth and an influx of workers to the region;
- Induced development scenario analysis related to other industrial activity and economic growth likely to be associated with the Project;
- Assessment of the Woodland Cree "ability to take advantage" of economic benefits associated with the Project;
- A Land Use and End State Visioning process for whatever site is preferred (or multiple alternative sites if they are carried forward to the IA);
- Involvement in any archaeological impact assessments;

³ See also Topic #7 in Appendix 1.

- Woodland Cree culture and rights study to inform the required rights impact assessment under the federal IA.

Given the large amount of information required and the time it will take to gather it, **Woodland Cree notes again that the onus is on the Proponent to not overwhelm the time-delimited Planning Phase and request a pause of Phase 1 to start scoping this critical work. Woodland Cree must have the right of first refusal to engage in any studies related to our traditional territory and/or impacts on our members. Woodland Cree notes that acceptable impact assessment in 2025 does not simply see Indigenous peoples providing baseline – “raw inputs” – for an assessment to be conducted by the Proponent and its consultants--WCFN must be directly involved in, and in some cases to be determined during the meaningful consultation period, must be the party responsible for completing the studies and assessments of the potential impacts.**

Woodland Cree’s Expectations of the Federal Impact Assessment

Woodland Cree expects the following practices in relation to this Impact Assessment moving forward, which must be reflected in the Planning Phase documentation (including but not limited to the Indigenous Engagement and Participation Plan and TISG):

1. Evidence of provision of substantive capacity funding to Woodland Cree;
2. Completion of a multi-party, multi-attribute alternative means assessment prior to proceeding to developing the Impact Statement, to identify a preferred project location or even two suitable candidate locations. Given the uncertainty related to the very preliminary engagement by the Proponent with Woodland Cree and the availability of capacity funding, the Project location is likely not going to be finally decided in 2025 as suggested by Energy Alberta;
3. Identification of joint decision-making structures for Indigenous groups, IAAC, and the CNSC, both within the impact assessment process and in relation to the final decision on whether the Project should proceed and under what conditions. In other words, the parties need to examine options to make sure that WCFN is directly involved in designing and determining how the IA process proceeds;
4. Expedited efforts by IAAC and CNSC to enter into a collaboration/cooperation agreement with Woodland Cree prior to the completion of Phase 1.
5. Evidence that the proponent has finalized a Woodland Cree-specific Indigenous Engagement Plan, with funding, timelines and scope defined, prior to the completion of Phase 1 of the IAAC process. As noted above, this should have been completed prior to the filing of the IPD;

6. Demonstrable commitment by the Proponent and all responsible Crown authorities to integration of IK not just as an input, but a lens - focused by Indigenous peoples themselves - for the effects characterization, significance estimation, and decision-making;
7. Commitment by both Canada and Energy Alberta to fully apply the requirements of UNDRIP, including Article 29(2), in the impact assessment process, and adhere to Woodland Cree's free, prior and informed consent decision in relation to the Project;
8. Including requirements for specific Indigenous-led studies and assessments directly into the Tailored Impact Statement Guidelines;
9. Agreement during Phase 1 between the Proponent and Woodland Cree on how Woodland Cree will be involved in effects characterization and significance determination in the IS, especially but not exclusively in relation to TLRU, Indigenous culture, and Indigenous social, economic and health conditions;
10. Commitment by the Proponent to adhere to requests by Woodland Cree that the Planning Phase be put on pause so that early engagement can be completed;
11. Provision by the federal government of extensive capacity funding and training for Indigenous community staff to undertake "Nuclear 101" training to be better prepared to assess a major nuclear power plant project;
12. Completion of serious updating of cumulative effects assessment on the Peace River, with a focus on the affected portion of the river, prior to the issuance of the IS;
13. Provision of detailed information about likely ancillary developments, especially but not limited to energy transmission infrastructure, and integration of the impacts of those ancillary developments into the Project impact assessment if they are created as a result of the Project;
14. Life cycle assessment related to GHG emissions, including emissions associated with additional oil sands development activities that may be made economically feasible by the supply of nuclear energy generated electricity;
15. Establishment of a credible "Zone of Influence" for travel, habitation and traditional harvesting, around the project using preference analysis with Indigenous groups;

16. Full Ability to Take Advantage (ATTA) studies for all regional Indigenous groups are critical and assessment of impact and benefit equity critical;
17. Full and proper Land Use and End State studies completed, including principles, objectives, criteria, remedial options analysis, and approved end state zoning, prior to the IS being produced. Woodland Cree cannot assess decommissioning unless assessing against a desired end state;
18. The IPD lacks meaningful discussion of radioactive waste storage and disposal plans. The storage and disposal of low, intermediate and high level radioactive waste is an essential aspect of project planning and must be incorporated into subsequent phases of the impact assessment. Woodland Cree must be assured that our territory will not become a *de facto* disposal site for the Project's radioactive waste, due to insufficient long-term disposal planning.
19. Decommissioning is a phase of the Project and as such must be subject to environmental impact assessment. As much detail as is provided on construction and operations, must be provided on decommissioning in the TISG and IS;
20. Woodland Cree need to see evidence that MONARK can be built safely at scale, as we understand it has never been built previously at this scale;
21. Disaggregation of socio-economic impacts down to the level of individual Indigenous communities is essential rather than regional pooling of data;
22. Effects on mental health and well-being of Indigenous peoples is recognized as being within the federal jurisdiction and fulsomely assessed;
23. A full and proper "Gender-Based Analysis +" approach is used to understand differential effects on more vulnerable sub-populations. Woodland Cree will need to sign off on methods, given our people in general and specific sub-groups within them are among the most sensitive human receptors in relation to the proposed Project;
24. All valued components will be assessed for changes both in the normal course of operations and in a wide variety of failure modes, including agreed upon worst case scenarios; and
25. A jointly agreed upon (Woodland Cree, IAAC and CNSC) approach to assessment of effects on Woodland Cree's Treaty and Aboriginal rights.

All of the above must be accomplished and/or agreed upon prior to this impact assessment completing the Planning Phase. Before moving to the next steps of the impact assessment process, Woodland Cree expects Canada to respond to this initial submission, and in particular, to respond to the above list of expectations. Where Canada disagrees with or intends to not meet any of Woodland Cree's expectations, as set out above, Canada should provide its reasons, in writing, for that decision and should be prepared to meet with Woodland Cree representatives to discuss that decision and explore potential alternative measures to address Woodland Cree's concerns.

Woodland Cree's expectations for this process are commensurate with the unprecedented size and scope of the proposed Project. It has been over 30 years since Canada has been asked to consider, assess, and approve, the development of a new CANDU-scale nuclear power facility. The last time a nuclear power facility was proposed and licensed, the Canadian Nuclear Safety Commission did not exist, and the *Nuclear Safety and Control Act* was not in force. At that time, accepted best practices with respect to impact assessment were far different from what they are today and the duty to consult and accommodate, required by s.35 of the *Constitution Act, 1982* had not yet been described by the Supreme Court. The Project proposed by Energy Alberta is not 'business as usual'. While the benefits that might flow from the Project are potentially significant, the risks and adverse impacts to the environment and Woodland Cree's rights are also, undoubtedly, significant and far-reaching. No matter how beneficial the Project might be overall, our children and grandchildren will have to live in the shadow of the Project, if built, for many generations.

Woodland Cree has legal obligations, both under Canadian law, and *Wahkohtowin*, the Cree legal principle of interdependence, to ensure that if we give our consent to this Project, that such consent follows a process that allows our leadership and members to be fully informed, and to make a consent decision which takes into account the potential risks and benefits.

This process demands that Canada respect our right to free, prior and informed consent, and fully incorporates that obligation, as guaranteed by UNDRIP, into its processes. Canada's courts have left no room for doubt that UNDRIP is part of Canadian law, and the right to consent must be incorporated into the duty to consult. Where, as here, the potential impacts on Woodland Cree's established rights are significant, Woodland Cree's consent must be a condition to the project proceeding.

We encourage Canada and the Proponent to ensure that Woodland Cree is meaningfully integrated into the steps which will follow, on the basis of the expectations that we have set out in this letter. Woodland Cree reserves the right to identify other expectations as the process matures.

Regulatory Approval Processes

The regulatory approval window for the Project is short, and while it is currently in its early stages, planning for later stages must not be put off. Woodland Cree expects IAAC and the CNSC to engage meaningfully and frequently with our team as the regulatory process progresses, and for consultation to be ongoing and responsive throughout that process.

In particular, we expect to be involved in planning for the hearing process which is used for the ultimate regulatory approval and licensing request. While this submission has focused mostly on the impact assessment process itself, due to its immediacy and importance in shaping the steps that follow, Woodland Cree also expects that the eventual decision-making process will adopt best practices in procedural fairness and transparency, and ensure that Woodland Cree is able to fully participate not only as an intervenor providing its views, but as a responsible government on whose territory the Project is planned. We expect to be able to submit our own expert and direct land-user evidence, test the evidence of the Proponent and Government of Canada staff, and engage directly and, where appropriate, bilaterally, with Federal decision-makers to ensure that the duty to consult is discharged.

Once IAAC and CNSC are prepared to discuss procedural design for the regulatory approval process, we expect to be engaged at the earliest possible opportunity, recognizing that Woodland Cree's full involvement and participation may require adjustments to existing policies and procedures.

Closure

We look forward to working together with the Crown and the Proponent, ensuring that the rights of Woodland Cree First Nation are respected and maintained through a best practice impact assessment on this largest and most unique of proposed projects.

With Respect,

<Original signed by>

Jenna Strachan

Director of Lands, Consultation and Government Relations
Woodland Cree First Nation

Attachments:

Appendix 1: Table of Woodland Cree Comments on PRNPP IPD

Appendix 2: Checklist of IAAC's Initial Project Description (IPD) Requirements as Against the Peace River Nuclear Power Plant IPD

Appendix 1: Table of Woodland Cree IPD Comments

1. Potential Effects	
Section/Page	Comment
4.3.5.1 Activities (Decommissioning); 4.6.6 Alternative Waste Management	Onsite waste storage and management could have critical impacts to Woodland Cree. These plans will contribute to the cumulative impacts of waste storage, disposal and processing facilities in Woodland Cree’s territory, which are already significant due to several other temporally and geographically linked projects. There is insufficient information in the IPD about potential water and soil contamination and mitigation measures. Woodland Cree must be involved in decision making for the chosen waste management strategy.
4.4.2.3.4 Exclusion and Emergency Planning Zones	<p>The Proponent in this section discusses exclusion zones around the Project area, including a larger controlled area surrounding the site. This would have a permanent effect on Woodland Cree First Nation and would damage rights in the area, potentially in perpetuity when considered in combination with stigma that may be created by a nuclear power plant. The Proponent should detail and indicate on a map the entire area that would exclude access for First Nations exercising their rights.</p> <p>In addition, the Proponent should identify how it is going to, in the EIS, identify the likely “zone of influence” for Indigenous rights practice both in a (1) normal operations scenario and (2) in a worst-case accident/malfunction scenario.</p>
5.2.3.3 Fish and Fish Habitat	<p>The Proponent writes that the project is not anticipated to impact any aquatic species at risk (p. 5-39). However, there are numerous aquatic species at risk that have been documented in the Peace River, and are listed in Table 5.2-4. The proponent assumed that, because these species have not been recorded within 5 km of the project site, they will experience no impact. However, this assumption is overly simplistic and overlooks how the potential withdrawal of water from the Peace River during project operations can have an impact on both upstream and downstream fish populations and habitats.</p> <p>Additionally, the fish and fish habitat information that this assumption is based on is from a desktop review of AEPA FMIS 2024. This raises concerns to Woodland Cree about the accuracy and reliability of the proponents' conclusions.</p> <p>Given these uncertainties, the proponent should revise the statement to acknowledge that there is low confidence in this prediction, and that there is a potential for aquatic species at risk to be impacted.</p>
5.6.4.2 Health Services	The section on Health services does not detail the potential effects of an influx of thousands of workers to the area and the potential for strain on local infrastructure and health services in the area, in particular impacts on Indigenous

1. Potential Effects	
	Peoples as a result.
5.6.4.4 Transportation	The section on Transportation does not detail the potential project effects of increased traffic in the area as a result of the Project, including for example on community safety and accidents risk, wildlife injury and mortality, etc. and how this may impact Indigenous peoples.
7.6.1 Traditional Land and Resource Use	This section does not discuss any potential psychosocial impact from the project on traditional land and resource use.
7.7 Impacts to the Health, Social, and Economic Conditions of Indigenous Peoples	The Proponent focuses on positive impacts of employment in the region as a result of this project. However, there is no inclusion on the potential adverse effects on Indigenous communities where higher paying jobs may attract members away from working in essential community services.

2. Potential Effects on specific sub-populations (i.e., GBA+)	
Section/Page	Comment
4.3.6 Labour Force	The Proponent estimates that the project construction workforce will be up to 5,000 workers at peak, and that the operational workforce would be at 2,700 workers. However, there is no description of any potential risks that this may most on vulnerable sub-populations.
7.4.3 Gender-Based Analysis Plus	<p>The Proponent refers to applying a gender-based analysis plus (GBA+) framework to identify how different groups may experience impacts from the proposed project.. The Proponent notes that effects will be described based on both data collected and concerns expressed through engagements with Indigenous communities.</p> <p>Woodland Cree notes that while engagement is an important aspect of the GBA+ framework, Indigenous involvement in the GBA+ analysis should not be limited to only being engaged by the Proponent. There must be commitments in place that the Proponent should integrate IK and IKUS data into the GBA+ analysis, and provide communities with the opportunity to verify how their knowledge has been integrated into the analysis.</p>
7.4.3 Gender-Based Analysis Plus	The Proponent notes that “Qualitative information on equality, diversity, inclusion, and related issues will be collected from studies and consultations.” However, this should not be limited to qualitative information only, as quantitative information will also be critical. What quantitative data on these topics does the Proponent plan to integrate?

3. Potential Benefits	
Section/Page	Comment
4.1.4 Value Added and Economic Growth	The Proponent highlights there will be opportunities for partnerships with Indigenous Nations. No discussion on what benefits packages are on offer by the proponent is included, so there is nothing to work off.
7.7 Impacts to the Health, Social, and Economic Conditions of Indigenous Peoples	<p>The Proponent states that they are committed to engaging with Indigenous groups to identify opportunities for employment, contracting, and procurement of goods and services throughout the proposed project's lifespan. More details are needed, for example, will the proponent commit to establishing and tailoring specific targets or quotas for employment, contracting, and the procurement of goods/services to the capacities and interests of each affected Indigenous group?</p> <p>As mentioned elsewhere, extensive studies, including on the fit of the Project's labour and business requirement the labour and business pool of local and regional Indigenous groups, will be required and must be scoped during the Planning Phase.</p> <p>It is also not clear what measures the proponent is committing to implementing to ensure that this commitment extends throughout the over 100-year lifespan of the proposed project.</p>

4. Areas of Concern	
Section/Page	Comment
General	Radiological legacy on site after decommissioning is not clearly identified - what is it? How much LLW, ILW and HLW is likely to be left on site, why, and of what type and risks?
General	Risk communication is a critical element of any nuclear project, especially given stigma associated with the sector. The Proponent does not identify its plans for risk communication with different and diverse audiences in the IPD. When will this information be provided? Material to assessment of impacts on TLRU, culture, Indigenous health and well-being, navigation, among other values.
3.2.1 Indigenous Engagement Tools	The Proponent states they will respect Indigenous decision-making processes, presumably in accordance with UNDRIP. Will the proponent also respect the FPIC decision of Woodland Cree? A clear statement is required, setting out what,

4. Areas of Concern	
and Methods	and how, the proponent will respect Woodland Cree’s decision-making processes, and how the proponent understands the right to FPIC to work.
4.2.3.2 Design Basis Earthquake	The Peace River area is an area known to have heightened seismic activity (https://ags.aer.ca/our-science/earthquakes-and-induced-seismicity/mapping-seismic-hazard-0). However, the MONARK reactor standard plan is designed based on current generic seismic data. Raises concerns if this approach will reflect the site-specific seismic risks, which are heightened as there is no detail about how the proponent will make site-specific design adjustments later on in the process.
4.3.5 Decommissioning	The Proponent plans to develop only a Preliminary Decommissioning Plan after the IA but prior to permitting. This is not acceptable to Woodland Cree, which needs to understand both high-level plans (what closure objectives, criteria, and end state zoning will the site be cleaned up to) and detailed plans for how this will be accomplished, <u>prior to</u> making any free, prior and informed consent decision.
4.3 Activities, Infrastructure, and Physical Works	The activities in this section are a generic list, but does not include any further information about potential timing, size of areas (e.g. blasting, land clearing)
4.3.5.1 Activities (Decommissioning)	The proponent does not mention that restoration and remediation of the site will include Indigenous groups and adhere to their goals and objectives for future land use.
Figure 4.4-3: Site Cooling Water Infrastructure Diagram	The cooling water system process requires water from the Peace River, and the Proponent notes that to protect the Peace River water levels, water reservoirs are currently designed into the site layout. Woodland Cree is concerned that there is a lack of information on how this may affect water levels at different times of the year, and if climate change and extreme drought scenarios were carefully considered in the project design? Please provide more information on the demands on and risks to the Peace River water levels.
4.4.2.3.4 Exclusion and Emergency Planning Zones	The Proponent states: “As the site-specific design stage progresses, the required zones for the Project are expected to be calculated, with analysis justifying their sizes, and agreed with the province of Alberta and local municipal emergency planning organizations.” Indigenous groups including Woodland Cree First Nation should also be involved in determining zones of exclusion areas, and potential exception areas for Indigenous Peoples only.
4.4.2.3.4 Exclusion and Emergency Planning Zones	The Proponent writes that advances in technology in the new modern reactor designs (i.e., passive and inherent safety systems) intend to “practically eliminate” risks of accidents from the reactor. With this claim, the Proponent states that

4. Areas of Concern	
	<p>“certain emergency response planning requirements would be eliminated (p. 4-24).”</p> <p>The removal of emergency response planning requirements cannot be done without engaging with Indigenous groups, including Woodland Cree First Nation. While technological provisions may decrease the likelihood of accidents and malfunctions, there is still a risk that such events could occur. This risk must be addressed through meaningful dialogue on the scope and nature of emergency response planning. As such, Indigenous groups must be engaged in discussions to determine which emergency response requirements are appropriate and necessary for the project.</p> <p>Woodland Cree also notes for the record that suggesting that a reactor that has never been built to scale for purposes of generating grid power, is somehow automatically assumed to have no risk of reactor accident, cannot be credited, given the absence of a track record.</p>
4.6 Alternative Means of Carrying Out the Project	<p>The Proponent states that IAAC defines alternative means, but this is incorrect. Any party can identify alternative means to be considered, and while the Proponent must consider any alternative means identified by IAAC, the Proponent is not limited to considering alternative means as defined by IAAC. It is Woodland Cree’s expectation that the Proponent will assess any alternative means identified by us, in a collaborative fashion.</p>
4.6.3 Alternative Workforce Accommodation	<p>The Proponent notes that “alternatives for workforce accommodations will be a key discussion topic when engaging with Indigenous Nations and Communities (p. 4-34).” However, this has not been a discussion topic of substance to date.</p> <p>Evaluating alternatives for workforce accommodation will require a multiple accounts evaluation that should lead to a verified and agreeable outcome for Indigenous peoples. This must be done having a proper understanding of the local context as well as by considering case studies of different housing types for major construction projects.</p>
4.6.5 Alternative Switchyard Design	<p>The proponent notes that they are undertaking early transmission studies and connection configuration options to determine the preferred transmission connections alternatives. Once this is done, the final design, routing, and approvals will be done separately to the assessment of the proposed project.</p> <p>Woodland Cree is opposed to the transmission line not being included as part of this impact assessment, as this would be a case of project splitting, which Woodland Cree does not accept.</p>
5.5 Cultural Resources	<p>The Proponent suggests only a Historic Resources Overview will be provided to understand the potential to impact historical resources; however Woodland Cree understands more will be necessary, likely full Stage 1 and Stage 2 Archaeological Impact Assessments will be required, in addition to immediate meaningful engagement with Indigenous Nations on this topic. More discussion on the required scope of archaeological and heritage resource assessments is</p>

4. Areas of Concern	
	required during Phase 1.
7.6.1.2 Cultural Resources	The proponent notes that heritage resources are protected by the province. This is only partially correct. In addition, Articles 11 and 31 of UNDRIP which state that Indigenous Peoples have the right to maintain and protect their own cultural heritage, including historic resources.
7.7 Impacts to the Health, Social, and Economic Conditions of Indigenous Peoples	<p>The Proponent states that “Over time, and with ongoing engagement with communities, people are expected to become more knowledgeable of nuclear energy generally, and the Project, thus becoming more comfortable living in its vicinity.” However, this is a strong and unverified assumption that more information about nuclear energy will translate into more comfort and positive associations with the project, which may not be the case for Indigenous peoples.</p> <p>The Proponent uses evidence of generic, independent polling surveying communities near nuclear facilities and their perceptions of safety to support their claim above. However, if this was not conducted on Indigenous communities specifically, it should be removed as it is not likely applicable or relevant evidence.</p>

Additional Topics Flagged for Review by Woodland Cree

5. Process Steps and How Woodland Cree Wants to be Involved	
Section/Page	Comment
3.3 Engagement Tools and Methods	<p>One of the engagement tools and methods identified by the Proponent is the “integration of Indigenous Knowledge into the assessment process in a respectful and valued manner.”</p> <p>However, there is no mention under Section 3.3, or throughout the IPD, of the Two-Eyed Seeing approach. This is an overarching guiding principle for collaboration with Indigenous Nations, and the Woodland Cree note that this approach should be integrated into the <i>assessment methods</i>.</p>
3.5 Assessments Relevant to the Report	<p>The Proponent states that they intend on integrating Indigenous Knowledge into environmental monitoring, impact assessment, and the design of mitigation strategies.</p> <p>Woodland Cree notes that this phrase should be revised to clearly reflect that the use and integration of Indigenous Knowledge by the proponent is dependent on the consent of the Nation.</p>
3.6 Other Relevant Studies	<p>The listed studies or plans that the Proponent included do not list any plans or studies already completed by Woodland Cree. Woodland Cree would like the opportunity to provide materials to be included on several topics, including but not limited to current use of land and resources for traditional purposes, Indigenous Knowledge, and cumulative effects.</p>

6. Information Gaps to be Filled	
Section/Page	Comment
General	<p>Phase Zero (0) is the pre-planning phase which IAAC has recognized, and which should allow for extensive engagement between the proponent of a project and the affected Indigenous groups. Phase Zero has been recognized explicitly because IAAC has heard from Indigenous Nations that the 180 Day Phase 1 Planning process is very short - indeed largely untenable from an Indigenous perspective. The record of engagement so far suggests that the Proponent has not taken full advantage of Phase Zero as the engagement record is light, there are no agreements in place with Woodland Cree for how the assessment will be conducted and Woodland Cree’s role in it, no scoping studies have been conducted with the Woodland Cree, and the identification of two alternative locations for the potential project does not appear to have been fully informed through meaningful engagement with Woodland Cree. It</p>

6. Information Gaps to be Filled	
	will be difficult to impossible during the truncated Phase 1 planning process to “catch up” due to this gap created by the proponent. The problem then becomes that the Tailored Impact Statement Guidelines, which are the outcome of the short Planning Phase 1, may not be suitably detailed or focused, yet they drive the remainder of the assessment process.
General	Local Study Areas (LSAs) and Regional Study Areas (RSAs) are inconsistently defined and not fully supported by a rationale. The parties need to see the rationale and maps for all LSAs and RSAs for review and comment.
2.1 Project Overview	The Proponent in this section states that the plant will have 4 CANDU MONARK reactors, but elsewhere it states that there will be up to 4. Can the proponent detail what factors will influence this choice and what implications does greater or lesser reactors have for potential impacts?
2.1 Project Overview	This Project is ~24 times the size of a project that would require going to IA, and the Proponent states this will provide roughly 30% of Alberta electricity needs. Can the Proponent detail what additional infrastructure may be needed to transport the electricity to markets? And what are those primary markets (e.g. oil sands or other)?
2.1 Project Overview	The Proponent states that “The final decision on the site location will be made after evaluating technical and safety requirements, environmental impacts, Indigenous and social considerations.” How will these factors be weighted and scored? With whose involvement? Woodland Cree does not seem to have been involved in alternative siting location options and needs to be involved in any future determination of final location.
3.1 Corporate Commitment to Engagement	The Proponent flags that they will undertake engagement for the proposed project in a manner that is consistent with regulatory guidance and best practices. The Proponent must clarify what Indigenous best practice guidance documents they are using to guide their engagement approach, as none are listed in the IPD.
3.2.1 Indigenous Engagement Tools and Methods	The Proponent has stated they aim to have equitable economic opportunities for Indigenous groups. The Proponent first needs to understand the capacity of Woodland Cree First Nation to participate and take the most advantage of the project's benefits, as this is a multi-decade, over \$30 billion dollar project.
3.2.1 Indigenous Engagement Tools and Methods	The Proponent has committed to the meaningful engagement and integration of traditional/Indigenous knowledge. However, just stating this commitment is not enough. The proponent must provide more details on how they intend to integrate traditional/Indigenous knowledge into the assessment. As part of this, the proponent must identify best practices or guidelines that they will adhere to when integrating traditional/Indigenous knowledge. What evidence can the Proponent provide to date that they have done this either in the past or on this project?

6. Information Gaps to be Filled	
3.2.1 Indigenous Engagement Tools and Methods	The Proponent notes that they intend to prioritize in-person engagement with Indigenous Nations and communities through meetings, workshops, and site visits. The Proponent should describe what progress has been made to date in setting up these community-led engagements.
3.2.1 Indigenous Engagement Tools and Methods	<p>The Proponent provides a list of specific tools and methods to facilitate meaningful engagement with Indigenous peoples. As written in the IPD, this reads like a ‘plan for a plan’, with little evidence of Nation-specific plans in place.</p> <p>The Proponent needs to provide additional details on each of the identified tools and methods and provide a better description of how they will be used. Woodland Cree would like to note that if Phase Zero was properly used, there would be more detailed engagement tools and methods that the Proponent could refer to in this section.</p>
3.2.2 Identification of Potentially Impacted Indigenous Nations and Communities	The Proponent notes in Section 3.2.5 that engagement will be based on Indigenous Nations interest and degree of potential impact. Woodland Cree First Nation will be the closest community to both Option 1 and Option 2 based on ‘as a crow flies’ distance. Therefore, the Proponent should provide an explanation on how the ‘degree of potential impact’ would be calculated in both locations.
3.2.5 Future Indigenous Engagement Activities	Woodland Cree expects recognition by the Proponent as being a “most affected Nation” in relation to the proposed project. As such, the Proponent must provide an explanation to Woodland Cree about how it intends to adjust the scope of its engagement measures to reflect this.
3.5 Assessments Relevant to the Project	<p>Not enough information is provided on Peace River cumulative effects assessment, oil sands region cumulative effects assessments, planning processes related to health, land use, etc. in north-central Alberta. More information required; not just limited to federal regional and strategic assessments.</p> <p>If considering Wood Buffalo National Park (WBNP) plans, then all plans in between Peace River and WBNP are also in play, meaning the oil sands region's studies and plans need to be listed as well, including the Strategic Environmental Assessment conducted for WBNP. This is a gap.</p>
3.6 Alternative Means of Carrying out the Project	The Woodland Cree have expressed concerns about what the project will do about the river because Site C has devastated land and why is this project needed in addition to that power generating project? How is this project different from Site C, who gets what power? Where is it going? These concerns flag both cumulative effects on the Peace River from multiple projects, and whether there is suitable demand for additional power and how it is going to be used. The Nations needs answers to these questions before assessing whether the project is an important required project.

6. Information Gaps to be Filled	
4.1.1 Purpose of the Project	<p>The proponent notes that the CANDU MONARK “expands existing oil sands and energy services capabilities (p. 4-1),” but the meaning and implications of this claim are not clarified in the IPD.</p> <p>More detail is needed to understand the likely flow of energy from the Project to proposed customers, including the oil sands sector. If the primary customer is the oil sands sector, then the Proponent may needs to revise some of its claims related to how the Project will beneficially impact on GHG emissions. The provision of cheaper electricity to the oil sands could increase their geographic scope, the volume of total oil extracted, and the lifespan of oil sands. This would undermine claims the Proponent has made about the project providing environmental benefits.</p>
4.1.4 Value Added and Economic Growth	<p>The Proponent estimates there will be approximately 20,260 jobs per year during design and construction and 3,500 FTE jobs per year during operations. What data can the Proponent provide to support this estimate? And how many Indigenous peoples are estimated and targeted to be a part of the workforce?</p> <p>Note: The summary IPD document says 3,500 FTE jobs, and the full IPD says 33,500. Assuming the latter is an error.</p>
4.1.4 Value Added and Economic Growth (pg. 4-5)	<p>The Proponent states that “There are also various behind-the-meter nuclear power solutions that may be considered”. When would these be detailed further and would this have any impact on the project components and activities (or size of the project footprint?)</p>
4.1.4 Value Added and Economic Growth	<p>An examination of spin-off industrial development associated with existing CANDU reactors in Canada necessary to understand the type of induced development likely to occur around the nuclear facility.</p>
4.2 Preliminary Topics of Interest	<p>The Proponent should break down the topics of interest by Indigenous group.</p>
4.3.3.2 Infrastructure - Non-Nuclear	<p>The installation of a permanent high-voltage transmission switchyard and other interconnection infrastructure will be done during the constriction process to connect the proposed project to the new 500kV provincial power transmission network.</p> <p>The installation of a permanent high-voltage transmission switchyard, and the connection of the proposed project to the provincial power transmission network, needs to be discussed in more detail. Additionally, the provincial power transmission network needs to be included in all proposed site maps.</p>

6. Information Gaps to be Filled	
4.3.3.3 Infrastructure - Nuclear	<p>The Proponent must provide evidence showing the permanent facilities for the management and storage of low-level and intermediate levels of radioactive waste, as well as for the management and storage of used fuel is:</p> <ul style="list-style-type: none"> - Capable of handling all “1 in 1000” and (in some cases) “1 in 10,000” year natural event likelihood; and - Designed with ease and completeness of decommissioning in mind to ensure that there are no residual radiological impacts during the post-closure phase of the proposed project.
4.3.3.3 Infrastructure - Nuclear	<p>When describing the proposed nuclear infrastructure for the proposed project, the Proponent uses language suggesting that all these components will be “permanent (pp. 4-10 to 4-11).” The use of this term is highly problematic as Woodland Cree expects the Proponent to commit to removing all radiological wastes from the sites within 10 years of completion of the life cycle of the reactors. The Proponent needs to commit to providing additional details about their plans for waste removal and site decommissioning through:</p> <ul style="list-style-type: none"> - Developing a full land use and end-state study in collaboration with, and verified by, regional Indigenous groups; and - Developing a comprehensive closure plan that must be included as part of the Impact Statement.
4.4.2.2 Plant Design	<p>Spent fuel, according to the plant design will include a storage pond “with capacity to store 10 years of spent fuel before dry fuel storage is required”.</p> <p>Can the Proponent detail information on potential accidents and malfunctions, including worst-case scenarios on spent fuel storage, and how the design intends to avoid or mitigate these risks?</p>
4.4.2.3 Site Design Data	<p>The Peace River is a flood-prone region. Unclear why there has been no safety considerations related to flooding that have been incorporated into the site design.</p>
4.4.2.3.1 Site Cooling Water Infrastructure	<p>The Proponent states that “Currently a mechanical draft cooling tower design is proposed, however, additional studies are being completed to confirm the best available technology and design.”</p> <p>Can the Proponent detail what other options are being considered at this time? How might the other options affect or change proposed project components and activities?</p>
4.4.2.3.1 Site Cooling Water Infrastructure	<p>The Proponent notes that a “once-through cooling water system is not workable” because “it is not acceptable to return that large amount of warmer water to the Peace River (p. 4-20).”</p> <p>Can the Proponent detail how much warmer the water they return to the Peace River will be, what impacts this may</p>

6. Information Gaps to be Filled	
	have on fish and fish habitat, and when in the process water will be returned into the Peace River.
4.4.2.3.2 Design Basis Earthquake	Given the seismic activity recorded in the proposed site options, the description of the design basis earthquake provided by the Proponent is insufficient to understand whether the proposed design is appropriate for both site options. The Proponent does not provide sufficient detail about the specific seismic hazard being assessed, the criteria they have used, or what design measures will be put in place to ensure that the facility will be safe in the event of an earthquake.
4.4.2.3.4 Exclusion and Emergency Planning Zones	<p>One of the zones that the Proponent will establish around the proposed site is the 'Ingestion Planning Zone (IPZ).' This will be the zone around the site where it would be necessary to plan and prepare measures against exposure from the ingestion of radioactive material. The very name of the IPZ is likely to raise substantive risk perception among Indigenous peoples and points to the importance of culturally appropriate, science and IK-informed risk communication with Indigenous peoples should the Project proceed.</p> <p>The Proponent needs to provide information about what type of risk communication tools it plans on investing in, in collaboration with Indigenous groups. A requirement to describe in detail planned risk communication should be built into the TISG.</p>
4.4.2.3.4 Exclusion and Emergency Planning Zones	<p>The Proponent writes that "results from safety analyses (i.e., the probabilistic safety analysis) in combination with the protection strategy used by offsite planners will determine the EPZ size (p. 4-25)." However, this completely sidelines the involvement of Indigenous groups in the process of determining the EPZ size.</p> <p>Woodland Cree, and all other affected Indigenous groups, must be involved in the process of determining the EPZ site around the proposed Project.</p>
4.5.1 Project Schedule	Can the Proponent share examples of reactor projects that have been cleaned up and restored to pristine conditions post-closure?
4.5.2 Project Stages	The completion of site selection would be unrealistic by the end of 2025 as the multi-party alternative means assessment for the site selection has not been finalized. The Proponent should adjust their timelines to reflect the necessary time it would take to complete this assessment.
4.6.1 Alternative Locations	The Proponent needs to clarify whether any other sites have been considered as Alternative Locations apart from Option 1 and Option 2, especially considering that it has been 16 years since Golder undertook their study.
4.6.1 Alternative Locations	Although the Proponent details that "a siting evaluation is underway (p. 4-33)" to assess which of the two identified locations are preferred, it is unclear how the siting process is being done. The description provided about the siting

6. Information Gaps to be Filled	
	evaluation process suggests that the Proponent has primarily focused on technical feasibility and their own operational preferences. There is no mention of any consideration of Indigenous values, objectives, criteria, weighting, and scoring. The Proponent needs to confirm whether they intend to consider the aforementioned aspects to any extent in their siting evaluation.
4.6.6 Alternatives Waste Management	<p>The Proponent confirms that the chosen alternative to radioactive waste management will be on-site processing and interim storage. However, no information is provided about any waste management strategies for radioactive waste. Woodland Cree would like to emphasize that no onsite waste disposal is acceptable.</p> <p>The IPD only states that the material will be stored on-site for the interim, but the waste would need to go to facilities outside of Alberta. It has not been clarified where the radioactive waste will be transported to for long-term storage / disposal.</p>
4.7 Potential Alternatives to the Project	Did the Proponent consider geothermal as a preliminary power generation option in the potential alternatives? Please provide detail on why or why not.
5.1 Proposed Location of the Project	<p>Can the Proponent share information for their plans of any new required powerlines to get electricity to markets? How will they be included in the assessment? Any new transmission, connection facilities, and linear disturbances need to be assessed as part of the overall project, as they would not be built without it.</p> <p>An alternative means assessment and cumulative effects assessment including these components is critical to understanding potential impacts to Woodland Cree First Nation.</p>
5.2 Physical and Biological Environment Overview	<p>The characterization of the physical and biological environment provided throughout Section 5.2 only focuses on a regional study area (RSA) that has been established around the proposed site options. However, there is no rationale provided as to how the RSA was defined by the Proponent.</p> <p>Additionally, it is noted that there is no defined local study area (LSA) in the IPD. The rationale behind this is unclear and the Proponent must provide an explanation as to why they have not defined a LSA for each Valued Component.</p>
5.2.3.1 Hydrology	The Proponent does not mention Site C dam, which also regulates the Peace River. The Proponent is requested to confirm it will include this and its potential cumulative effects assessment of river hydrology in the IS.
5.3.1 Fish	The Proponent only includes information from the Crown and other western scientific sources but does not include any Indigenous Knowledge regarding fish and characterizing their presence and risk status and its importance to Indigenous Peoples.

6. Information Gaps to be Filled	
5.4.1 Traditional Land and Resource Use	The Proponent discusses following IAAC's and the Canadian Nuclear Safety Commission guidance on the inclusion of IK in the IA process. This might be a first step, but Indigenous groups must be involved in guidance and in particular need to follow IK protocols. What specific protocols is the Proponent aware of and will follow?
5.4.1 Traditional Land and Resource Use	<p>The Proponent states that "The IPD is informed by previous IK and TLRU studies and hearing testimony provided by Indigenous Nations and Communities".</p> <p>Can the Proponent detail how and where specifically IK and TLRU studies were integrated into the IPD? And, what information came from Woodland Cree and was verified by Woodland Cree?</p>
5.4.1 Traditional Land and Resource Use	<p>The Proponent notes that it "will provide opportunities for Indigenous Nations and Communities...through submitting their own Traditional Land and Resource Use (TLRU) studies to help inform the Impact Assessment process."</p> <p>Woodland Cree may want to be more involved in a way that respects their own governance, not simply feeding into the Crown's IA process or the Proponent's reinterpretation of Woodland Cree's IK and TLRU. Further discussion on this and resolution prior to the end of the Planning Phase is critical.</p>
5.4.1 Traditional Land and Resource Use	<p>The Proponent states that "Building relationships with Indigenous communities ensures their knowledge informs every phase of the Impact Assessment."</p> <p>Woodland Cree requests information on the degree that those relationships have already been built. If they are not well advance, the Proponent should request a pause to the Planning Phase to build these relationships up.</p>
5.4.1.1 Treaty 8	The information used by the Proponent to contextualize Treaty 8 and its implications on Indigenous peoples is outdated; all the sources referenced by the proponent are over 20 years old. This section should be revised and updated with current reference sources.
5.5 Cultural Resources	The section describing Cultural Resources only includes information from the province, with no discussion around Indigenous peoples IK and input into what cultural resources may be in both project area options.
5.6.2 Education	There is no discussion in the Education section on educational rates for Indigenous peoples, and if available, for Woodland Cree First Nation members specifically.
5.6.3 Health	Proponent will have to provide a plan to deal with gaps in individual Indigenous community health data in the assessment. What is that plan?

6. Information Gaps to be Filled	
5.6.4.4 Transportation	Nations need information on radiological and other transport risks and how much the Project during construction and operation will impact on area traffic arteries.
5.6.5 Economy	The section on Economy does not include any information on Indigenous peoples' traditional economy (e.g. hunting, fishing) and the importance in the area, as well as Indigenous vs. non-Indigenous economy.
5.6.6 Labour Force	The section on Labour Force does not include any breakdown of Indigenous peoples and their employment rates and potential barriers.
6.1 Federal Funding	Can the Proponent provide more detail on the following: 1) How much funding has it received from the federal government? 2) what access to capital does the proponent have otherwise?
7.1 Approach to Determining Potential Effects	Not included in Table 7.1-1 include the following project components/activities: 1. Building of electrical transmission infrastructure away from the facility; 2. Housing for workforce during construction and operations; 3. Utilization of social and physical infrastructure by workers and businesses. These need to be integrated as Project physical works and activities.
7.9.2 Liquid Effluents	More information is needed on the specifics of the radiological effluents. Need more information on the scope of these radiological effluents, sources, management approaches, amounts, half-lives, and environmental risks. how much LLW, ILW and HLW expected; how will be managed, disposed of, nature of it? More information on doses to workers and area residents and traditional users are also required.
7.9 Waste and Emissions	Tritium is identified by the Proponent as one of the main air emissions that will be emitted during the operations phase and decommissioning phase of the proposed project. Also, tritium emissions are a well-documented issue in CANDU reactors due to their use of heavy water as a coolant. There is not enough information in the IPD outlining specific measures that the Proponent will implement to monitor and control tritium emissions.

7. Studies that may be Required, and Woodland Cree's Desired Role	
Section/Page	Comment

7. Studies that may be Required, and Woodland Cree’s Desired Role	
General	There is a strong need for psycho-social impact assessment of the proposed nuclear power plant(s). The nuclear sector comes with a lot of fear and stigma, and our understanding is that under IAA 2019, mental health is a component of health overall that must be subject to assessment. Establishment of the effects of the Project on Indigenous individual and communal well-being and mental, physical and other components of Indigenous health is critical.
2.1 Project Overview	<p>Two options are presented for the location of the proposed Project, with the Proponent stating that the final decision on the site is expected to be made by late 2025. There is no mention by the proponent as to the process of undertaking a fulsome Alternative Means Assessment of both site options. This is a required study/process that should include the use of Indigenous values, objectives, criteria, weighting, and scoring. To accomplish this, Indigenous groups, including WCFN, must be involved in the Alternative Means Assessment.</p> <p>Unless the process of an Alternative Means Assessment has been started (WCFN to confirm), it is recommended that this be completed prior to any decisions about the siting being made for the proposed Project.</p>
3.4 Assessments and Studies Relevant to the Project	Regional Plans are often the default for addressing Cumulative Effects. AB has not yet started the regional plan for the Upper Peace. This is a Significant Issue. The Government of Alberta must complete the Upper Peace Regional Plan (UPRP) prior to this project moving to the Impact Statement Phase.
3.5 Assessments Relevant to the Project	<p>The Proponent writes that Indigenous Knowledge studies will be conducted as the Project undergoes an impact assessment. More detail is needed about how the proponent will support Indigenous Nations and communities when undertaking these studies.</p> <p>Additionally, Woodland Cree would like to note that all Indigenous Knowledge and data from the Indigenous Knowledge studies must be managed in accordance with any protocols or agreements with WCFN, which must be in place before the process progresses..</p>
3.5 Assessments Relevant to the Project	The Woodland Cree expect that the scope of studies required will be built into the TISGs and Project assessment plan, so a delay to Phase 1 may be necessary such that an information gap analysis can be completed and the scope of all required studies defined.
4.1.4 Value Added and Economic Growth	A full “Ability to Take Advantage” (ATTA) study required for all regional Indigenous groups. Scope of economic benefits is not necessarily beneficial if they are not accessible, and indeed disproportionate access to benefits can be an adverse effect for those “left behind”.

7. Studies that may be Required, and Woodland Cree’s Desired Role	
	This may also include assessment of the “fit” of the available workforce to the positions on offer from such a facility. Indigenous recruitment, retention and advancement analysis is necessary to understand the likelihood that Indigenous peoples (and business) will get jobs, keep jobs and grow in those jobs in a way that supports personal and community well-being. This is not described in the IPD.
5.1.5 Proximity to Land Used for Traditional Purposes by Indigenous Peoples of Canada	A Traditional Knowledge and Land Use Study as well as alienation and loss of use mapping will have to be done for this proposed project. It is likely that Woodland Cree will need to work with the proponent to establish a Zone of Likely Influence for Indigenous peoples.
5.5 Cultural Resources	<p>The Woodland Cree expect that all aspects of Indigenous culture, including tangible, semi-tangible and intangible elements of culture, will be subject to the assessment, and that great deference will be given to the perspectives of the Indigenous peoples themselves when assessing impacts on Indigenous culture. Neither requirement is reflected in the IPD.</p> <p>The Woodland Cree also note that Indigenous guidance needs to be followed in relation to cultural impact assessment and want to know what Indigenous guidance the proponent will follow.</p> <p>The Woodland Cree hold that cultural impact assessment is a federal requirement as cultural rights are Constitutionally protected rights that may be impacted by the Project.</p>

Appendix 2: Checklist of IAAC’s Initial Project Description (IDP) Requirements as Against the Peace River Nuclear Power Plant IPD

Note: Sourced from [IAAC’s Guidance](#)

Category	Requirement	Addressed?	PRNPP Gaps Identified and Further Information Required
General Requirements	The project’s name, type or sector and proposed location.	Partially	The absence of a preferred location is not a fatal flaw at this stage of the IA. What is problematic is the absence of evidence that Indigenous values, criteria, weighting, scoring, or even serious inputs of any type have been integrated into the determination of the two potential locations. Woodland Cree’s position is that a multi-party, multiple accounts analysis of alternative locations for the PRNPP must be completed prior to moving to Phase 2 of the IAA process.
	The proponent’s name and contact information and the name and contact information of their primary representative for the purpose of the description of the project.	Yes	–
	A summary of any engagement undertaken, including: <ul style="list-style-type: none"> - A summary of the key issues raised, - The results of engagement; and - Brief description of any plan for future engagement. 	Partially	<p>The Proponent does include a summary of the engagement that has been undertaken to date, however, the reality is that the scope of this engagement has been inadequate for a project of this size, complexity, and public concern.</p> <p>Topics of interest should be updated to include:</p> <ul style="list-style-type: none"> - Potential impacts to practice Indigenous culture and way of life; - Potential impacts to valued plants, wildlife, fish, or other resources; - Alteration of cultural connection to Peace River; - Ancillary developments (power transport infrastructure) and how they would be assessed in the IA

Category	Requirement	Addressed?	PRNPP Gaps Identified and Further Information Required
			No timeline for engagement has been outlined, and no engagement milestones have been identified in the IDP. Engagement seems forward looking only; again the absence of adequate Phase Zero engagement is highly problematic and needs to be dealt with through a Proponent-requested "pause" to the Planning Phase.
	<p>A list of Indigenous groups that may be affected by the carrying out of the project, a summary of any engagement undertaken with the Indigenous peoples of Canada, including:</p> <ul style="list-style-type: none"> - A summary of the key issues raised, - The results of engagement; and - Brief description of any plan for future engagement. 	Partially	The topics of interests raised during consultation have been included in Table 3.2-1. It is noted that Woodland Cree First Nation has provided the most feedback in relation to the Project, but precious little to none of this feedback is included in the IDP.
	Any study or plan relevant to the project that is being or has been conducted of the region where the project is to be carried out where the study or plan is available to the public.	Partially	<p>The listed studies or plans that the proponent included do not list any impact assessments that have been conducted pertaining to the Peace River. This includes but is not limited to the Site C Clean Energy Project, Dunvegan Hydroelectric Project, and Amisk Hydroelectric project.</p> <p>In addition, no other relevant studies from Woodland Cree are listed in Section 3.6. Woodland Cree expects the proponent to provide resources to conduct a traditional knowledge and land use study, cumulative effects assessment, and study of contaminant production, release and transport through the environment.</p>
	Any strategic assessment, relevant to the project, that is being or has been carried out under section 95 of the Act.	Partially	<p>The proponent states that apart from the Strategic Assessment of Climate Change, there are “no other strategic assessments as defined in Section 95 of the IAA that are relevant to the Project (p. 3-14).”</p> <p>The Woodland Cree would like to point out to the proponent that a Strategic Environmental Assessment (SEA) for Wood Buffalo Park was completed by Parks Canada in May 2018. This SEA should be included in the IDP as there are several components of the SEA that will be relevant for</p>

Category	Requirement	Addressed?	PRNPP Gaps Identified and Further Information Required
			the proposed Project. These include cumulative effects, Peace River water quantity and quality, and migratory birds in the area.
Project Information	<p>A statement of purpose of and need for the project, including any potential benefits.</p> <ul style="list-style-type: none"> - Purpose of Project: what is to be achieved by clarifying out the Project. - Need for the Project: Opportunity that the Project is intended to solve or satisfy. 	Partially	Project claims to support reduction in GHG emissions need to be examined in a full life-cycle analysis, including not just the generation of power at the plant, but also examination of how it will be used downstream. If one of the main purposes is to electrify the oil sands, this will need to be reflected in the GHG “footprint” of the Project.
	<p>The provisions in the schedule to the Physical Activities Regulations describing the project, in whole or in part.</p> <p>Proponents must detail how the project meets the description, threshold (e.g. provide the length of new right of way) and the criteria in any of the other provisions.</p>	Yes	-
	<p>A list of all activities, infrastructure, permanent or temporary structures and physical works to be included in and associated with the construction, operation, decommissioning of the project.</p> <ul style="list-style-type: none"> - Including any existing structures or related activities that are required to accommodate or support the designated project. <p>List should distinguish between any ongoing activities or existing physical works and those that form part of the designated project.</p>	Partially	<p>Gaps from the proponent’s physical works and activities list includes:</p> <ul style="list-style-type: none"> - Transport of materials to and from the site; - Transport of workers; - Housing of workers; - Utilization of local and regional physical and social services; and - Electricity infrastructure to transport electricity from the plants to the market. <p>For the decommissioning phase, the proponent has only committed to developing a Preliminary Decommissioning Plan (PDP) during early site licensing, and “prior to the execution of decommissioning, the PDP will be converted into a Detailed Decommissioning Plan (p. 4-12).” More information on decommissioning will be critical to understanding potential effects to Woodland Cree. For example, it is not at all clear from the IPD whether there will be any radiological legacy left at the site post-closure.</p>

Category	Requirement	Addressed?	PRNPP Gaps Identified and Further Information Required
	An estimate of maximum production capacity of the project and a description of the production processes to be used.	Yes	–
	The anticipated schedule for the key activities of the project's construction, operation, decommissioning, and abandonment phases, including any expansions of the project.	Partially	<p>The project schedule is provided and key details in the IDP are:</p> <ul style="list-style-type: none"> - Construction: 10 to 12 years - Operation: 70 years - Decommissioning: 20 years - Abandonment: In 2135 <p>A requirement for the Proponent is to provide an anticipated schedule for the key activities during each project phase, however, this is not evident in the IDP. There's no detail about the key activities (i.e., land grading) nor their timing in the project schedule. With this, the IDP requirement is not fully addressed.</p> <p>The Proponent also hints at expansion, noting “within the Project overall licensed capacity, allowing for any optimizations of the design for this site and potential enhancements to optimize power output (p. 4-14)” but there is no other mention of expansion plans throughout the IDP. This leaves uncertainty to WCFN as to whether Energy Alberta is planning to expand the facility in the future.</p>
	<p>A list of potential:</p> <ul style="list-style-type: none"> - Alternative means that the proponent is considering and that are technically and economically feasible, including through the use of best available technologies; and, - Alternatives to the project that the proponent is considering and that are technically and economically feasible and directly related to the project. 	Partially	<p>Section 4.7 is a non-objective assessment of solar and wind power, listing solely negative aspects of those energy generation systems and not a single positive aspect. It is not credible as a comparison of the pros and cons of those power generation technologies against nuclear.</p> <p>The Proponent also focuses heavily on emphasizing only positive aspects of nuclear energy. For example, some negative aspects include:</p> <ul style="list-style-type: none"> - Generation of high-level radioactive waste that will be stored on-site until a disposal site is determined; - Worst case scenarios that could see radiological material issued on land, in water and in the atmosphere; and

Category	Requirement	Addressed?	PRNPP Gaps Identified and Further Information Required
			<ul style="list-style-type: none"> - Declining traditional use/rights practices around the Project site, due to fears about the risks of nuclear power. <p>It is also important to note that the CANDU MONARK reactor was designed in 2023. However, it is our understanding that it has never been used or tested in a real-world energy operation. This lack of a track record should be flagged in the alternatives analysis.</p>
Location and Context	<p>Proposed geographic coordinates including, for linear development projects (e.g. pipelines, transmission lines), the proposed locations of major ancillary facilities that are integral to the project, and a description of the spatial boundaries of the proposed study corridor.</p> <ul style="list-style-type: none"> - Coordinates should be provided in a suitable form to use in GIS. 	Partially	Coordinates for the two potential sites flagged by the Proponent are included. Not included is any detailed information or maps on required and potential electricity transmission infrastructure that would be required to get energy to markets. This is a major gap from Woodland Cree’s perspective.
	Site maps at the appropriate scale.	Partially	Again, nothing for potential, proposed, likely ancillary linear transmission infrastructure.
	The legal description of land to be used for the project, including, if the land has already been acquired, the title, deed or document and any authorization relating to a water lot.	Partially	<p>A legal description is provided for the land to be used for the Project.</p> <p>However, it remains unclear how access to the Peace River for water intake may interact with provincial Crown lands. And, there is no mention of any authorization relating to the Peace River, given that the Project will be taking water from there.</p>
	The project’s proximity to any residences and proximity to the nearest affected communities.	Yes	-
	<p>The project’s proximity to:</p> <ul style="list-style-type: none"> - land used for traditional purposes by Indigenous peoples of Canada; - land in a reserve as defined in subsection 2(1) of the Indian Act; 	Partially	Though the Project’s proximity to land in a reserve is included under Section 5.1.4, there is no information under Section 5.1.5 about this. Recommended that clear distances be provided in this section to align with IPD requirements.

Category	Requirement	Addressed?	PRNPP Gaps Identified and Further Information Required
	<ul style="list-style-type: none"> - First Nation land as defined in subsection 2(1) of the First Nations Land Management Act; - land that is subject to a comprehensive land claim agreement or a self-government agreement; and - any other land set aside for the use and benefit of Indigenous peoples of Canada. 		The Proponent also writes that the project is “located on lands that may have been used previously for traditional purposes (p. 5-12).” The use of this language does not acknowledge that there is likely current use of the general area for traditional purposes, desired future use, and that the lands – even when they are held privately by farmers or other interests – are within the traditional territory of the Woodland Cree and play important ecological roles with wildlife and plants critical to Woodland Cree rights practices.
	Project’s proximity to any federal lands.	Yes	The IDP states that the Project is not located on federal Crown lands, but that there are First Nations reserves located within 100 km of the Project sites.
	A brief description of the physical and biological environment of the project’s location.	Partially	No Indigenous Knowledge was integrated when describing the environment in this section.
	A brief description of the health, social and economic context in the region where the project is located.	Partially	Woodland Cree’s expectations here are higher than those of Canada. We expect that prior to the completion of the Planning Phase, the Proponent will have exhibited an extensive knowledge of our communities, territories, people, promise and problems. That is not evident in the IPD.
Federal, Provincial, Territorial, Indigenous and Municipal Involvement and Effects	A description of any financial support that federal authorities are, or may be, providing to the project.	Yes	–
	A list of any federal land that may be used for the purpose of carrying out the project.	Yes	–
	<p>A list of the permits, licenses, or other authorizations that may be required by jurisdictions that have powers, duties or functions in relation to an assessment of the project’s environmental effects.</p> <p>A list of any changes to the environment or to health, social or economic conditions that may occur in Canada that are directly linked or necessarily incidental to the involvement of a federal authority that would permit or enable the project to be carried out in whole or in part. The description should</p>	Partially	<p>The Proponent lists all the relevant legislation and jurisdictions that will have power, duties, and/or functions related to the assessment. However, the Proponent does not identify any specific permits, licenses, or other authorizations required for the proposed project.</p> <p>Section 6.3 does not include any mention of specific changes to the environment or to health, social, or economic conditions in Canada that are linked or incidental to a decision by a federal authority (i.e., IAAC or CNSC). Given the nature of this Project, some potential changes to the environment or to social, health, or economic conditions could include</p>

Category	Requirement	Addressed?	PRNPP Gaps Identified and Further Information Required
	<p>identify the specific power, duty or function of, or financial assistance from, a federal authority to which the effects are linked, and which should be identified as outlined in section 4.0 of this Annex.</p> <p>This should include any greenhouse gas policies, legislative or regulatory measures applicable to the project.</p>		<p>increase in employment, changes in local air quality, and increase in stress and/or anxiety to people living near the project. These should be included here to fulfill the requirements of the IPD.</p>
Potential Effects of the Project	<p>A list of any changes that, as a result of the carrying out of the project, may be caused to the following components:</p> <ul style="list-style-type: none"> - Fish and Fish Habitat (as defined in the Fisheries Act) - Aquatic Species (as defined in Species at Risk Act) - Migratory Birds (as defined in Migratory Bird Convention Act) 	Yes	-
	<p>A list of any changes to the environment that may occur:</p> <ul style="list-style-type: none"> - on federal lands; - in a province other than the province in which the project is proposed to be carried out; or, - outside of Canada. 	Partially	<p>The proponent identified that no changes to the environment, in another province, or outside of Canada, or on federal lands are anticipated. However, it is unclear how the proponent arrived at this conclusion.</p>
	<p>A description of any impact on Indigenous peoples’:</p> <ul style="list-style-type: none"> - physical and cultural heritage, - the current use of lands and resources for traditional purposes, and - any structure, site or thing that is of historical, archaeological, paleontological or architectural significance. 	Partially	<p>The only impact identified by the proponent is “impacts to the environment can be intricately linked to potential impacts to Indigenous and Treaty Rights and way of life (p. 7-17).”</p> <p>But, the IPD requirement asks for a description of any impact on cultural heritage, the current use of lands and resources for traditional purposes. However, the <u>Proponent does not provide any specific description of potential impacts.</u></p> <p>The IPD requirement asks for the Proponent to describe any potential impacts from available information or from the engagement undertaken. The lack of described impacts suggests that no information on potential</p>

Category	Requirement	Addressed?	PRNPP Gaps Identified and Further Information Required
			impacts is publicly available, and that none of the Proponent’s initial engagement with Woodland Cree was inadequate to bring forth any information that could describe potential impacts.
	A brief description of any change that, as a result of the carrying out of the project, may occur in Canada to the health, social or economic conditions of Indigenous peoples, based on information that is available to the public or derived from any engagement undertaken with the Indigenous peoples of Canada.	Partially	<p>While the Proponent does identify some generic changes in the health and/or social conditions of Indigenous peoples in this section, they mainly focus on identifying changes to the regional economy and population.</p> <p>The effects described in this section appear to be fairly generic and do not identify any specific changes that may affect communities located closer to the project site compared to others. For example, the Proponent notes that there may be changes in the perception of risk and feelings of personal safety of Indigenous peoples due to the nuclear facility but does not mention that communities located closer to the site (i.e., WCFN) will feel this change at a higher degree compared to communities located further away. The Proponent also does not explain how changes in the perception of risk can cause changes to the health (including mental health), social, or economic conditions of Indigenous peoples. For example, the Proponent does not discuss how this could increase feelings of anxiety or stress (health change) or decrease use of areas around the site for social or cultural purposes (social change).</p>
	An estimate of any greenhouse gas (GHG) emissions associated with the project.	Partially	Full life-cycle analysis including “downstream” GHG emissions facilitated by the supply of nuclear power-generated electricity to other industries is not included or, so far as Woodland Cree can tell, planned.
	A list of the types of waste and emissions that are likely to be generated - in the air, in or on water and in or on land - during any phase of the project.	Yes	-
Summary	A plain-language summary of the information in parts A to E is required in English and in French.	Yes	-

