



May 14, 2025

VIA EMAIL: [iaac.consultations-aeic@iaac-aeic.gc.ca](mailto:iaac.consultations-aeic@iaac-aeic.gc.ca)

Impact Assessment Agency of Canada (IAAC)  
160 Elgin Street, 22nd Floor  
Ottawa, ON K1A 0H3

**RE: Some Initial Comments on the Initial Project Description for the Peace River Nuclear Power Project (Energy Alberta Corporation)**

Dear Sirs/Mesdames,

On behalf of Dene Tha' First Nation (DTFN), we respectfully submit the following comments in response to Energy Alberta Corporation's *Initial Project Description (IPD)* for the proposed Peace River Nuclear Power Project, dated April 2025. This submission reflects our preliminary review of the IPD and identifies critical gaps and concerns related to the project's scope, Indigenous rights under Treaty No. 8, and foreseeable regional impacts.

As signatories to Treaty 8, the Dene Tha' continue to assert our constitutionally protected rights to hunt, fish, trap, and engage in traditional land use activities throughout our traditional territory, including Crown lands potentially impacted by this project. The Peace River region holds longstanding cultural, ecological, and spiritual significance for our people, and any industrial activity within or near this area must be assessed with full consideration of our rights, knowledge, and governance systems.

**Scope of Project Description – Incomplete Infrastructure Assessment**

While the IPD outlines the construction and operation of up to four 1,200 MW CANDU MONARK reactors on a ~640-hectare site, it explicitly excludes from consideration the associated high-voltage transmission infrastructure necessary to connect the project to Alberta's electrical grid. The proponent notes that this infrastructure will be addressed under separate provincial processes; however, this segmentation is inconsistent with the Impact Assessment Act (IAA), which requires the full physical activity—including integral off-site infrastructure—to be considered in environmental and socio-cultural assessments.

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The transmission lines are expected to be among the most spatially disruptive components of the project. They will likely create new linear corridors through boreal forests, caribou habitat, and wetlands within Treaty 8 territory, introducing:

- Landscape fragmentation,
- Wildlife displacement,
- Increased access pressures on harvesting areas, and
- Permanent disruptions to land use and cultural practice.

DTFN requests that IAAC explicitly include transmission infrastructure and access routes in the designated project scope.

### **Induced Regional Development – Long-Term and Cumulative Effects**

The introduction of a large-scale, base-load nuclear facility in remote northwest Alberta will likely catalyze substantial and unassessed industrial, agricultural, and settlement expansion. These include:

#### a. Industrial Development:

- Hydrogen/ammonia plants and synthetic fuels operations,
- Mining projects (e.g., lithium, rare earths, potash),
- Carbon capture and storage (CCS) hubs and associated infrastructure,
- Bitumen upgrading and petrochemical processing,
- Expansion of forestry operations, including mill infrastructure and fibre supply corridors,
- Construction or reactivation of pulp and paper mills, enabled by energy-intensive industrial processing.
- Cryptocurrency mining, data center, and Artificial Intelligence facilities

#### b. Agricultural and Irrigation Expansion:

- Electrified irrigation schemes into marginal lands,
- Greenhouse or energy-intensive indoor agriculture,



- Conversion of forested and wetland areas into cultivated landscapes.

c. Settlement and Land Tenure Transformation:

- New towns, roads, and subdivisions,
- Permanent settlement in traditionally unfragmented areas,
- Increased alienation of Crown land into private fee simple title, resulting in long-term loss of public access and traditional use rights,
- Potential for large-scale land speculation driven by energy and infrastructure corridors.

d. Recreational and Tourism Footprint:

- Recreational property development (cabins, lodges),
- Increased pressure on hunting, fishing, and trapline areas,
- Overlapping non-Indigenous uses in culturally sensitive areas.

We recommend that the potential for substantial industrial, agricultural, and settlement expansion—catalyzed by the introduction of a large-scale, base-load nuclear facility in remote northwest Alberta—be thoroughly assessed and explicitly addressed in future project planning and regional impact evaluations.

**Treaty Rights, Traditional Use, and Indigenous Governance**

The IPD references Indigenous engagement primarily in the context of information sharing and future capacity-building discussions. However, DTFN asserts a governance role in any project assessment or decision that may affect our lands, waters, or cultural survival. The proposed development lies within our traditional territory.

We emphasize the need for:

- Meaningful and well-funded consultation, co-designed and implemented by DTFN,
- Joint fieldwork and Indigenous-led baseline studies, including Traditional Knowledge and TLRU mapping,
- Recognition of Treaty No. 8 obligations as part of project justification and decision-making criteria,



- Inclusion of DTFN perspectives in defining what constitutes a significant adverse effect.

The project’s 80-year operational timeline and decommissioning horizon further highlight the intergenerational implications of this proposal on our youth, lands, and governance systems.

### **Duty to Consult and Treaty 8 Commitments**

Dene Tha’ First Nation is a signatory to Treaty No. 8, which affirms our rights to hunt, trap, fish, and sustain our ways of life across the lands we have traditionally occupied and used. These rights are not confined to the boundaries of our reserves but extend throughout the broader landscape where our ancestors have travelled, gathered, and lived since time immemorial.

At the time of Treaty-making, our people were assured that our ability to live off the land would not be taken away. We were promised that we could continue to use the land for food, culture, and ceremony, and that we would not be displaced from the territories that sustain our Nations.

The Peace River Nuclear Power Project proposes a major transformation of the land in an area that is culturally and ecologically significant. With an operational timeline that spans generations, and the potential to trigger further industrialization, the project has far-reaching implications. Given that the scale and significance of this project—including the risks inherent to nuclear power generation and potential accidents—are of the highest order, the degree of consultation and accommodation must reflect this reality. Dene Tha’ First Nation must not be treated as a stakeholder to be merely informed, but as a self-determining governing Nation with constitutionally protected rights, land-based responsibilities, and decision-making authority.

### **Project Overview, Purpose, and Location**

Dene Tha’ First Nation (DTFN) submits the following general comments regarding the Initial Project Description (IPD) for the Peace River Nuclear Power Project proposed by Energy Alberta Corporation. While the IPD outlines a plan for long-term energy production in Alberta, it fails to acknowledge that the proposed project area is located within the lands covered by Treaty No. 8, where DTFN members have constitutionally protected rights to hunt, fish, trap, and carry out traditional land-based practices.

The framing of the project as contributing to “clean, reliable electricity” must be reconsidered in light of the long-term waste management, water use, and potential accident risks inherent to nuclear technology. From DTFN’s perspective, clean energy must protect the integrity of

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ecosystems and uphold the rights of Indigenous peoples to continue cultural practices for generations to come.

The project location—west of Peace River—intersects lands and waters that support migratory species, fish populations, and boreal habitats that are central to DTFN’s subsistence and cultural identity. DTFN’s traditional territory boundary is demarcated by the Peace River, as it flows from what is now British Columbia, and along the right-hand bank facing downstream and extending inland of the shoreline to 500 meters.

### **Wildlife, Habitat, Aquatic Life, and Landscape Fragmentation**

The Peace River region is part of an interconnected ecological network that supports a wide range of species, including moose, woodland caribou, grizzly bear, migratory birds, and culturally important fish such as lake whitefish and bull trout. The Initial Project Description refers only briefly to environmental baseline conditions and does not adequately account for the large-scale habitat fragmentation that will result from clearing land for the facility, constructing new access roads, and extending transmission corridors.

From the perspective of DTFN land users, these changes are not isolated—they continue a broader trend of industrial encroachment that disrupts wildlife movement and diminishes the reliability of traditional harvesting areas. Linear features such as roads and transmission lines can act as long-term barriers to species movement and sources of ongoing disturbance to wildlife populations that DTFN members rely upon for food, cultural use, and economic sustenance.

The Peace River itself also supports aquatic ecosystems that are vulnerable to changes in flow, temperature, sediment, and contamination. The use of river water for cooling purposes and the potential for thermal or radioactive discharge during operations or accidents raises concerns about cumulative stress to fish populations and the broader aquatic food web.

These ecological changes intersect directly with the exercise of Treaty rights. The ability to carry out land-based practices depends not only on legal access to territory, but also on the continued ecological function of that territory. Wildlife availability, water quality, and undisturbed habitat are all foundational to DTFN’s cultural and subsistence traditions.

### **Emergency Preparedness, Accidents, and Intergenerational Risk**

The Initial Project Description states that emergency planning and accident risk management will be developed in later phases of project assessment. However, for a project of this magnitude and

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duration—particularly one involving radioactive materials and long-term waste storage—this is a significant omission. Emergency risks must be evaluated from the outset, including consideration of remote communities, the Peace River ecosystem, and cross-boundary impacts.

DTFN members are deeply concerned about how a serious malfunction, containment failure, or natural disaster could affect the health and safety of the land, waters, and future generations. The Peace River is a vital cultural and ecological artery; contamination or disruption would not be limited to the project area but could affect areas far downstream, across multiple jurisdictions.

The risk of nuclear incidents—even if unlikely—carries long-lasting consequences that extend beyond individual lifetimes. The catastrophic disasters at Chernobyl and Fukushima demonstrate the far-reaching and irreversible effects of radioactive contamination on human health, ecosystems, and community displacement. For Indigenous communities with responsibilities to land and kin beyond human generations, the prospect of radioactive contamination poses not only environmental and health risks, but cultural and spiritual harm as well.

In addition to measurable physical risks, DTFN members may also experience psychological and perceptual impacts. Public concern and cognitive perceptions surrounding nuclear energy can erode confidence in the safety of traditional foods, water, and land-based practices. Even in the absence of a visible incident, the mere presence of a nuclear facility may alter how land users interact with and trust the environment, leading to reductions in harvesting and use of culturally significant areas. These social and perceptual dimensions of risk must be considered in any impact assessment that aims to understand the full effects of the project on Indigenous wellbeing. that extend beyond individual lifetimes. For Indigenous communities with responsibilities to land and kin beyond human generations, the prospect of radioactive contamination poses not only environmental and health risks, but cultural and spiritual harm as well.

Emergency preparedness planning must take into account the realities of climate change, the complexity of evacuating remote or dispersed populations, and the need for Indigenous participation in defining acceptable risk thresholds. The exclusion of such planning from the current IPD undermines trust and highlights the need for early and meaningful Indigenous involvement in all risk-related assessments.

### **Peace River Water Use, Aquatic Health, and Hydrological Change**

The Peace River is a life-sustaining waterway for Dene Tha' First Nation and many other communities across Treaty 8 territory. Its waters are deeply tied to our harvesting traditions,

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spiritual practices, and ecological responsibilities. Any large-scale water withdrawal, alteration of flow, or thermal discharge from industrial activity directly threatens not only aquatic life, but the integrity of our relationship with the land and water.

The IPD identifies the Peace River as the primary water source for the nuclear facility, particularly for cooling purposes. However, it lacks sufficient detail on:

- Volumes of water that will be withdrawn or returned,
- Changes to temperature and sediment regimes,
- Risk of entrainment or thermal shock to fish populations,
- Impacts on ice formation, downstream flows, or seasonal flood cycles,
- Emergency discharge scenarios during accidents or unplanned releases.

Given the long-term nature of the project and its proposed scale, these water use impacts cannot be seen as minor or temporary. Aquatic ecosystems are sensitive to temperature and hydrological shifts, and species such as bull trout, Arctic grayling, northern pike, and lake whitefish may experience cumulative stress over time. These are species of cultural and subsistence importance to DTFN.

Furthermore, any contamination risk from routine or accidental releases—whether radioactive or thermal—could erode the confidence of community members to continue using these waters and fisheries. This is not only an ecological issue, but a matter of cultural security and Treaty rights.

DTFN urges that all Peace River-related impacts be assessed in full, including flow modeling, cumulative water withdrawals from all regional industrial users, and Traditional Knowledge-informed assessments of aquatic health and water quality. Full protection of aquatic ecosystems and Indigenous water rights must be central to the project review.

This assessment must also account for existing and proposed upstream infrastructure on the Peace River, including the W.A.C. Bennett Dam and Site C Dam in British Columbia, both of which already regulate flows and sediment regimes in ways that have long impacted downstream ecosystems. In addition, the proposed Amisk Hydroelectric Project—a run-of-the-river facility also located on the Peace River in Alberta—poses further cumulative risks to the river's seasonal dynamics and ecological integrity. These existing and foreseeable hydrological alterations must be



evaluated in relation to the nuclear facility’s potential impacts to ensure a full and honest accounting of risks to the watershed and DTFN’s relationship with the river.

During the Site C environmental assessment process, Dene Tha’ First Nation was told by the proponent that we could simply “go elsewhere” to exercise our Treaty rights. This dismissal of the cumulative effects of industrial development on our territory ignored the reality that suitable, intact areas for harvesting and cultural practice are already increasingly rare. The location of this proposed nuclear project—in one of the last remaining regions with large tracts of public land available for DTFN members to hunt, trap, and fish, and where industrialization is already at levels that majorly impact Treaty rights—suggests it is being advanced in one of the very same 'elsewheres' that we were previously told to rely on. We cannot allow every remaining space to be treated as disposable in the name of progress.

**Conclusion and Some Recommendations**

The Peace River Nuclear Power Project represents one of the most significant industrial proposals ever considered within Dene Tha’ First Nation’s traditional territory. Its long operational timeline, permanent landscape transformation, and interconnection with a broader web of industrial infrastructure mean that the consequences for land, water, and Treaty rights will be profound and long-lasting.

The cumulative context—including hydroelectric regulation of the Peace River, increasing industrial pressures, and the loss of intact Crown lands—places this project squarely in the path of one of the last remaining strongholds for the meaningful exercise of our rights. The suggestion made during previous projects that our people can simply "go elsewhere" is no longer viable. There is no elsewhere—except perhaps in a few places like the Bistcho Lake region of northwestern Alberta, where large tracts of public land still exist and where Indigenous-led planning efforts, including those described at [www.bistcholake.ca](http://www.bistcholake.ca), seek to protect Treaty rights through long-term stewardship and conservation visions.

In light of these concerns, Dene Tha’ First Nation respectfully reiterates some of our initial recommendations, including:

- That the scope of the impact assessment be expanded to include transmission lines, induced development, and off-site infrastructure;
- That Treaty rights and Indigenous knowledge systems be centered in the definition of impacts and significance criteria;

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- That Peace River water use and aquatic risk assessments include all upstream and downstream influences and Indigenous-defined indicators of ecological health;
- That a regional cumulative and residual effects assessment be triggered to understand the full landscape-level transformation this project could initiate;
- That consultation, assessment, monitoring, and long-term governance be co-developed with DTFN from the earliest stages through to decommissioning and beyond.
- Engagement with DTFN must be adequately resourced and structured to support meaningful participation across all stages of the process—including access to information, participation in assessments, formulation of recommendations, and active involvement of community members, leadership, harvesters, and knowledge holder
- There are also other recommendations that we would be grateful and appreciative in sharing with the proponent and Crown governments.

Dene Tha' First Nation remains open to respectful dialogue, collaborative environmental protection, and proactive solutions. However, this can only occur if the Crown and proponents recognize our role as rights-holders with enduring title and the need to protect and prioritize the implementation of Treaty No. 8, in the face of increasingly fewer and fewer places within our traditional territory that still support these rights.

Sincerely,

DENE THA' FIRST NATION

<Original signed by>

Fred Didzena  
Director of Lands

cc.: DTFN Council  
Chief Wilfred Hooka-Nooza <email address removed>  
Matthew Munson, Technician for DTFN, <email address removed>