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May 13, 2025

Impact Assessment Agency of Canada
Prairie and Northern Region
Canada Place
9700 Jasper Avenue, Suite 1145
Edmonton, Alberta T5J 4C3

VIA EMAIL: prairiesandnorthernregion-regiondesprairiesetdunord@iaac-aeic.gc.ca

Re: Submission of the Cadotte Lake Métis Nation on the Initial Project Description of the Proposed Peace River Nuclear Power Project (IIAC Registry Reference #89430)

Dear Sir/Madam,

Please find enclosed the initial comments of the Cadotte Lake Métis Nation (CLMN) in response to the Initial Project Description of the proposed Peace River Nuclear Power Project (the "Project"), submitted by Energy Alberta Corporation ("Energy Alberta").

This submission outlines CLMN's initial concerns and rights-based interests regarding the Project, which is proposed to be located within the heart of our Traditional Territory, in close proximity to the community of Cadotte Lake and the Town of Peace River—areas where our citizens live, practice our culture, and exercise their constitutionally protected rights.

As an Indigenous Government and historic rights-bearing Métis community, CLMN seeks early and meaningful engagement with Energy Alberta, the Canadian Nuclear Safety Commission (CNSC), and the Impact Assessment Agency of Canada (IAAC). We expect our rights, interests, and concerns to be taken seriously and addressed through all phases of the Project's planning, assessment, and decision-making processes. We look forward to working collaboratively with your respective offices to determine how CLMN will participate in this assessment process. Thank you for your attention. We await your response and remain committed to a constructive dialogue.

Sincerely,

<Original signed by>

Wendy Goulet
President
Cadotte Lake Métis Nation
Cadotte Lake, Alberta
Email: cadottelakemetisgroup@gmail.com

cc: CLMN Elders, Youth, and Community Members

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1. Introduction & Purpose of the Submission

This submission is respectfully presented by the Cadotte Lake Métis Nation (CLMN) to the Impact Assessment Agency of Canada (IAAC) and the Canadian Nuclear Safety Commission (CNSC) in response to the Initial Project Description (IPD) submitted by Energy Alberta Corporation regarding its proposed Peace River Nuclear Power Project—a Class I nuclear generating station to be located north of the Town of Peace River and east of Cadotte Lake, Alberta.

The proposed Project, consisting of up to five CANDU-type reactors—including the untested Monark design or the Enhanced CANDU 6 (EC6)—would produce up to 4,800 megawatts of electricity. The scale of the proposed facility is unprecedented for Alberta and western Canada. The siting area lies within the traditional, historical, and contemporary land use area of several Indigenous Nations, including the CLMN.

The CLMN asserts that it is a rights-bearing Métis community that meets the constitutional test for recognition set out in *R. v. Powley*, [2003] 2 S.C.R. 207.

The purpose of this submission is to:

1. Ensure that CLMN, as a constitutionally protected, rights-bearing Métis community, is engaged in all stages of the Project's assessment and regulatory process;
2. Identify key environmental, cultural, and socio-economic concerns based on CLMN's Traditional Knowledge, occupancy, and land use patterns;
3. Advocate for a robust scope of assessment that includes:
    - Cumulative impacts on CLMN rights and culture;
    - Evaluation of future climate scenarios affecting Peace River hydrology;
    - Alternative means of carrying out the Project;
    - Assessment of health risks arising from accidents, malfunctions, or catastrophic failures;
    - Specific analysis of impacts on CLMN's rights and way of life;
4. Assert the need for early, ongoing, and adequately funded consultation and accommodation, including capacity for CLMN to retain independent legal, technical, and Traditional Knowledge experts;

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5. Call for formal recognition of the Cadotte Lake Métis Nation as an Indigenous Government, with the right to participate in decision-making processes affecting its lands, people, and future.

CLMN is not opposed to clean energy development. Rather, the Nation affirms that no project of this magnitude should proceed without full, informed, and respectful participation of the Indigenous Peoples most likely to be affected.

This submission is a formal assertion of CLMN's standing, its concerns, and its expectations for a just and lawful review process. It also represents the Nation's commitment to constructive dialogue—one that must evolve into a long-term, rights-based relationship among CLMN, the Crown, and Energy Alberta.

2. Background on the Cadotte Lake Métis Nation

The Cadotte Lake Métis Nation (CLMN) asserts that:

- It is a distinct, rights-bearing Métis community situated in northwestern Alberta, in and around the Cadotte Lake area;
- It constitutes an "Aboriginal People" within the meaning of section 35 of the *Constitution Act, 1982*;
- It meets the criteria for the recognition of Métis rights as established by the Supreme Court of Canada in *R. v. Powley*, [2003] 2 S.C.R. 207.

The roots of the Nation predate effective European control in the region and are grounded in a long-standing and continuous relationship with the lands, waters, ecosystems, and cultural practices of the Peace River area—including Cadotte Lake and its surroundings.

The CLMN is composed of founding families whose genealogies trace back to the historic Métis populations that lived, travelled, and sustained themselves in the Lesser Slave Lake–Peace River region for generations. Family names include Carifelle, Noskey, Laboucan, and others. These families formed a close-knit community defined by collective identity, shared customs, kinship ties, and a cultural and material economy rooted in the boreal forest and freshwater systems of northern Alberta.

Over time, CLMN members established seasonal and permanent camps, traplines, trails, fishing areas, gathering zones, ceremonial sites, and kinship networks across the region—including the Peace and Cadotte Rivers, Cadotte Lake, and the broader Peace

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Country. These lands continue to be used by CLMN members today for subsistence, cultural continuity, and the exercise of Métis rights.

2.1 Recognition by the Government of Alberta

The Government of Alberta, through its 2019 update to the Métis Harvesting Policy, recognizes CLMN as one of the province's "historic and contemporary Métis communities" with a demonstrated basis for constitutionally protected harvesting rights. Alberta has issued Métis harvesting cards to numerous CLMN members, acknowledging their right to hunt, fish, trap, and gather for food and ceremonial purposes.

In 2022, CLMN submitted a formal information package under Alberta's Métis Credible Assertion Process, further substantiating the community's identity and territorial connections. This package included oral histories, genealogical documentation, land use and occupancy data, and published and confidential materials provided by respected scholars and Indigenous knowledge holders.

CLMN asserts that this body of evidence collectively affirms its long-standing and continuous use of the lands implicated by the proposed Peace River Nuclear Power Project.

2.2 Traditional Governance and Community Structure

The Cadotte Lake Métis Nation is governed by a community-elected Executive, led by President Wendy Goulet and supported by Elders, youth representatives, and key community members. CLMN functions as a self-determining Métis Government (IGOV), exercising stewardship responsibilities for its lands and people.

The Nation follows the principle that governance flows from the land, from the collective will of the people, and from the responsibility to uphold Métis values—such as kinship, interdependence, reciprocity, and respect for the environment. Governance decisions are made in accordance with these values, and Elders, knowledge holders, and community voices guide the Nation's direction and priorities.

2.3 Recent Engagement in Federal Processes

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Although many government agencies have historically failed to consult CLMN on resource developments within its Traditional Territory, federal regulators have more recently begun to include the Nation in impact assessment and regulatory processes. CLMN has participated in several major reviews, including:

- NGTL 2021 System Expansion Project (National Energy Board)
- NGTL North Corridor Expansion Project (National Energy Board)
- NGTL Valhalla North/Berland Project (Canada Energy Regulator)
- Pembina Taylor to Gordondale Project (Canada Energy Regulator – ongoing)

In each of these processes, CLMN has submitted evidence, appeared at hearings, and advocated for its rights. However, the Nation's ability to participate meaningfully has often been limited by inadequate funding, tight timelines, and restricted access to technical documents. CLMN is determined to avoid a repeat of this exclusionary pattern in the review of the proposed Peace River Nuclear Power Project.

2.4 A Nation Still Deeply Connected to the Land

Despite generations of industrial development and landscape change, CLMN members continue to live on, travel through, and actively use their Traditional Territory for subsistence, cultural, spiritual, and economic purposes. Community members hunt moose and waterfowl, gather medicines, fish, and hold ceremonies—activities that are rooted in a living relationship with the land.

CLMN members retain extensive ecological knowledge related to seasonal changes, wildlife behaviour, and the cumulative effects of industry on their homeland. Their identity as Métis people is not static or historical—it is dynamic, contemporary, and inseparable from the territory that sustains them.

Any large-scale project affecting the Peace River watershed and surrounding lands must therefore engage CLMN not merely as a stakeholder, but as a constitutionally recognized Indigenous Government with deep legal, cultural, and spiritual connections to the land. Engagement must be consistent with the honour of the Crown, the principle of reconciliation, and the right to be meaningfully consulted and accommodated.

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3. Overview of the Proposed Peace River Nuclear Project

Energy Alberta has proposed the development of a large-scale nuclear power generating station in the Peace River region of northwestern Alberta. Known as the Peace River Nuclear Power Project, this undertaking is intended to generate up to 4,800 megawatts (MW) of electrical power using multiple CANDU-type reactors. The scale and intensity of this development are unprecedented in both western Canada and Alberta.

Notably, no nuclear project of this magnitude has been proposed or licensed in Canada since the major new builds of the 1970s and 1980s.

3.1 Project Components and Technologies

According to the Initial Project Description (IPD), the Peace River Nuclear Power Project will include the following components:

- Construction and operation of two to five CANDU-type nuclear reactors, each with a generating capacity of approximately 1,000 MW;
- Use of either the Monark reactor design (a new and unproven technology still undergoing regulatory review) or the Enhanced CANDU 6 (EC6) design, which has not yet been built commercially;
- An intended operating life of 60 to 70 years (note that plants can be refurbished to extend their operating life as is currently being done with Ontario nuclear generating plants);
- Extensive cooling water infrastructure drawn from the nearby Peace River, including possible river intake systems, cooling ponds or towers, and discharge systems;
- On-site waste management systems for spent nuclear fuel and other radioactive by-products, including interim or potentially long-term storage;
- A wide range of supporting infrastructure, including:
    - Electrical substations and high-voltage transmission lines extending throughout the region;
    - Construction camps and workforce accommodations;

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- Access roads, security perimeters, and buffer zones;
- Storage facilities for hazardous materials and radiation containment;
- Emergency response and nuclear safety systems.

Energy Alberta has identified two potential/alternative siting areas approximately 25 kilometres north of the Town of Peace River. These sites are located roughly 45 and 48 kilometres from the Cadotte Lake Métis Nation community at Cadotte Lake. **(See Image on Page 23)**

3.2 Regulatory Oversight and Review

As a Class I nuclear facility, the proposed Project falls under the exclusive jurisdiction of the Canadian Nuclear Safety Commission (CNSC), pursuant to the *Nuclear Safety and Control Act*. Additionally, the Project is subject to review under the *Impact Assessment Act* (IAA), triggered by Energy Alberta's submission of the Initial Project Description to the Impact Assessment Agency of Canada (IAAC).

Under CNSC regulations, a license must be obtained for each major phase of development, including:

- Site preparation;
- Construction;
- Operation;
- Decommissioning;
- Waste management.

In parallel, the IAAC is responsible for determining whether a federal impact assessment is required. If so, the IAAC must define the scope of the assessment, establish the factors to be considered, and set timelines and consultation expectations.

CLMN's submission is provided in direct response to this early phase of regulatory planning. The Nation asserts that the scope of assessment must be broad, must incorporate Indigenous rights and land use, and must reflect the already heavily developed character of the region. Furthermore, the Crown's duty to consult and accommodate must be honoured from this earliest stage forward.

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3.3 Initial Concerns Identified by CLMN

Based on a preliminary review of the available public information, CLMN has identified several initial concerns with the proposed Project:

- Lack of early and meaningful engagement with CLMN despite its proximity to the Project (the CLMN notes that Alberta Energy has been engaged with various parties on the Project for some time);
- High levels of technological uncertainty, especially surrounding the untested Monark reactor design, and questions about long-term waste generation and safety;
- Extensive physical and ecological footprint, likely to cause long-term, possibly irreversible damage to ecological and cultural values in the area;
- Absence of a long-term nuclear waste disposal plan, raising concerns about liability, intergenerational responsibility, and the potential for on-site waste storage to become de facto permanent;
- Risks of accidents, malfunctions, or catastrophic failures, especially in a region already affected by seismic activity and ongoing oil and gas extraction pressures (e.g., near Harmon Valley);
- Potential community avoidance effects, psychological stress, and loss of spiritual connection to the land due to the plant's proximity and nature.

CLMN emphasizes that these concerns must not be addressed retroactively or dismissed through general mitigation language. They must be acknowledged, studied in depth, and addressed through inclusive processes that allow for early and ongoing Indigenous participation—consistent with statutory, constitutional, and international legal obligations.

4. Legal Foundations of Métis Rights and the Duty to Consult

The Peace River Nuclear Power Project engages deeply with constitutionally protected rights held by the Cadotte Lake Métis Nation (CLMN). These rights include the right to meaningful consultation and accommodation, the right to harvest and occupy land, and

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the inherent right of Métis Peoples to maintain, transmit, and protect their distinctive culture, laws, and ways of life.

This section outlines the key legal principles that must guide Crown agency assessment and decision-making. The Crown's obligations in this regard are constitutional in nature and rooted in binding precedents from the Supreme Court of Canada. These duties cannot be delegated to project proponents or substituted with generic or procedural forms of engagement.

4.1 Section 35 of the Constitution Act, 1982

Section 35(1) of the *Constitution Act, 1982* states:

"The existing aboriginal and treaty rights of the Aboriginal peoples of Canada are hereby recognized and affirmed."

This constitutional provision explicitly includes Métis Peoples as Aboriginal Peoples of Canada. Section 35 rights are not discretionary or policy-based—they are binding legal obligations that must guide the Crown's conduct and decision-making.

4.2 R. v. Powley, 2003 SCC 43

In the landmark decision *R. v. Powley*, the Supreme Court of Canada established a framework for the recognition of Métis rights. The Court held that:

- Métis rights are distinct from those of First Nations and Inuit, and must be evaluated on their own terms;
- Rights may include harvesting for food, livelihood, and cultural purposes;
- Recognition depends on the existence of a historic Métis community, continuity into the present day, and a shared cultural identity.

The Government of Alberta has recognized CLMN as a historic Métis community under its 2019 *Métis Harvesting Policy* and has issued harvesting cards to its members. In 2022, CLMN submitted materials under Alberta's *Métis Credible Assertion Process*, which the Nation asserts satisfy the criteria in *Powley*. As such, CLMN maintains that it holds recognized and exercisable section 35 rights in the region potentially affected by the proposed Project.

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4.3 Haida Nation v. British Columbia (Minister of Forests), 2004 SCC 73

The Supreme Court's decision in *Haida Nation* established the foundational legal test for the Crown's duty to consult:

1. The Crown must have actual or constructive knowledge of a potential Aboriginal right or title claim;
2. The Crown must be contemplating conduct or decisions that may adversely affect those rights.

Consultation must be:

- Meaningful, conducted in good faith, and not treated as a procedural formality;
- Proportionate to the potential impact on Indigenous rights;
- Initiated as early as possible in the planning and decision-making process.

CLMN asserts that it clearly satisfies the *Haida* test. The Crown has knowledge of the Nation's claims and rights, and the proposed Project carries the potential for significant and lasting infringement.

4.4 Taku River Tlingit First Nation v. British Columbia, 2004 SCC 74

In *Taku River*, the Court clarified that the duty to consult applies not only to permitting but also to strategic or high-level decisions, including those made during project planning and scoping.

The Initial Project Description stage—where decisions are made about whether an assessment is required, and what it should include—is precisely the kind of early phase that requires consultation. This aligns with the constitutional principles articulated in *Taku River* and affirms the need for CLMN to be meaningfully involved from the outset.

4.5 Mikisew Cree First Nation v. Canada (Minister of Canadian Heritage), 2005 SCC 69

Mikisew reinforced that consultation must offer a real opportunity to influence outcomes, not merely a process of information sharing. Specifically, the Crown must:

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- Provide reasons for how Indigenous concerns were or were not addressed;
- Take steps to minimize adverse impacts where possible;
- Recognize the sacred and intergenerational nature of Indigenous relationships to land.

CLMN's detailed concerns regarding land use, health, and cultural continuity require specific, traceable responses from both the Crown and Energy Alberta. General assurances or after-the-fact rationalizations will not meet the legal standard set by *Mikisew*.

4.6 Manitoba Métis Federation Inc. v. Canada (AG), 2013 SCC 14

This decision emphasized that the "honour of the Crown" is always at stake in the Crown's dealings with Indigenous peoples. The Court held that:

- The Crown must act with honour, integrity, and diligence;
- The failure to diligently implement constitutional promises can amount to a breach of the honour of the Crown.

In the context of the Peace River Nuclear Power Project, CLMN contends that any failure to engage the Nation meaningfully—despite the Crown's clear knowledge of its status and proximity—could constitute a violation of this principle.

4.7 Clyde River (Hamlet) v. Petroleum Geo-Services Inc., 2017 SCC 40

In *Clyde River*, the Court confirmed that regulatory processes can assist in fulfilling the duty to consult, but they cannot replace it unless they:

- Provide a meaningful opportunity for Indigenous participation;
- Allow Indigenous groups to influence outcomes;
- Directly address rights-based concerns, not just environmental impacts;
- Ensure access to funding and technical support so Indigenous communities can respond effectively.

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Given the highly technical and specialized nature of nuclear energy development, CLMN emphasizes that adequate capacity funding is essential. This includes resources for:

- Traditional Knowledge holders;
- Community service providers;
- Independent scientific and legal experts;
- Legal counsel with regulatory experience.

Without such support, CLMN cannot fully or fairly engage in a multi-year review process involving complex technical documentation and significant community impacts.

5. CLMN Traditional Territory and Use & Occupancy

The Cadotte Lake Métis Nation (CLMN) maintains a deep, continuous, and living relationship with the lands and waters of northwestern Alberta—particularly the Peace River region, Cadotte Lake, and the surrounding watersheds. This connection is rooted in generations of occupation, subsistence use, cultural practice, and environmental stewardship.

The area identified for the Peace River Nuclear Power Project falls squarely within the Nation's Traditional Territory. CLMN's members have historically used—and continue to use—this region for a wide range of activities, including hunting, trapping, fishing, gathering, ceremony, travel, and habitation.

The Nation's land use patterns are sustained by family networks, place-based knowledge, and intergenerational land-based practices. These patterns are intricately tied to areas both directly and indirectly affected by the proposed nuclear plant and associated exclusion zones, infrastructure corridors, and cumulative development impacts.

5.1 Cultural Land-Based Activities of the CLMN

CLMN members have historically engaged in, and continue to engage in, a wide range of traditional and cultural land-based practices across the region affected by the proposed Project. These include, but are not limited to:

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Hunting and Trapping

- Large game: moose, deer (white-tailed and mule), elk, black bear, bison;
- Furbearers: beaver, marten, lynx, fisher, muskrat, rabbit, wolf, coyote;
- Bird harvesting: ducks, geese, swans, partridge;
- Use of traplines, hunting blinds, game processing areas, and drying racks;
- Frequent travel into the Peace, Carmon and Cadotte River valleys during key harvesting periods.

Fishing

- Target species: northern pike (jackfish), trout, whitefish, sucker, pickerel (walleye), mariah;
- Spawning zone knowledge, particularly on the Cadotte River;
- Use of drying racks and smokehouses for fish preservation.

Gathering of Plants and Medicines

- Berry harvesting: saskatoon, blueberry, raspberry, wild strawberry, chokecherry;
- Medicinal plants: rat root, spruce gum, sweetgrass, yarrow, diamond willow fungus, laboom;
- Deep knowledge of seasonal cycles and microhabitats, passed down by Elders;
- Use of plants for both ritual and practical healing purposes.

Habitation and Travel

- Use of cabins, trapline camps, lean-tos, and seasonal campsites throughout the region;
- Maintenance of trail networks, canoe routes, and wagon roads;
- Instructional land use areas where youth are taught to live from and with the land;
- Preservation and transmission of knowledge in specific geographic locations tied to family use.

Cultural and Spiritual Continuity

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- Sites for ceremonial practices: sweat lodges, round dances, tea dances, pipe ceremonies;
- Known burial grounds of ancestors in the Peace and Cadotte River valleys;
- Materials gathered for making drums, regalia, hand games, and beadwork;
- Use of traditional place names and oral histories connected to the landscape.

5.2 Ongoing Use and Changing Patterns

Although CLMN members continue to use their Traditional Territory, patterns of land use have changed due to ongoing industrial development and associated pressures. These include:

- Longer travel distances to locate healthy game, fish, and medicinal plants;
- Declining harvesting success in areas near roads, seismic lines, and cleared zones;
- Avoidance of spiritually or physically altered landscapes;
- Reduced opportunities for youth to learn traditional skills due to habitat fragmentation and access restrictions.

The proposed Project would be constructed in an area that CLMN members actively use, traverse, and value. Its development could:

- Sever access routes;
- Degrade key ecological and cultural resources;
- Create both psychological and physical barriers to continued land use.

Even the perception that a landscape has become unsafe, poses potential risk to human health or has become spiritually compromised can prevent meaningful exercise of rights. This constitutes a direct impact on constitutionally protected Métis rights and on the identity, health, and cohesion of the community.

6. Anticipated Impacts of the Proposed Project

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Based on CLMN's preliminary review of the Initial Project Description (IPD) and the Nation's internal land use documentation, it is clear that the proposed Peace River Nuclear Power Project has the potential to cause significant impacts on CLMN's lands, constitutionally protected rights, community health, and way of life.

These impacts fall into four primary categories:

1. Direct impacts on land use and cultural values;
2. Indirect or induced impacts;
3. Cumulative effects in an already pressured region;
4. Human health and community avoidance risks.

6.1 Direct Effects on Land Use, Rights, and Cultural Values

The Project has the potential to cause immediate and long-term direct impacts, including, but not limited to:

- Loss of key large game hunting areas, particularly along the Peace River valley, benchlands, and the Cadotte and Carmon River systems;
- Destruction or obstruction of berry patches and traditional plant harvesting sites located within or near the project footprint;
- Disruption or removal of cultural campsites, trails, and spiritual sites due to site preparation and construction;
- Disturbance of wildlife habitat relied upon for sustenance and cultural practices (e.g., moose, deer, waterfowl);
- Loss of access to important fishing areas, especially along the Peace River near its confluence with the Cadotte River;
- Displacement of traplines and harvesting areas used for generations by CLMN families;
- Degradation or elimination of ceremonial and spiritual sites, including significant viewsheds and quiet zones essential for land-based cultural continuity.

6.2 Indirect Effects on Métis Land Use and Identity

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Beyond the physical footprint, the Project may also result in serious indirect effects, such as:

- Avoidance of lands in and around the plant site due to psychological, spiritual, and cultural disruption;
- Loss of quietude, sacredness, and safety, which discourages family gatherings, healing practices, and ceremonies;
- Increased noise, lighting, and surveillance, which make traditional use areas unwelcoming or feel unsafe;
- Increased traffic and industrial activity, raising safety concerns and putting pressure on wildlife populations;
- Restricted access through exclusion zones or buffer areas that prevent or complicate traditional use;
- Interruption of wildlife corridors due to project infrastructure, which impacts harvesting and ecosystem balance;
- Perceptions of contamination or danger, leading to reduced confidence in fishing along the Peace River downstream of the Town of Peace River and the Mercer Pulp Mill;
- Fragmentation of landscapes, contributing to a growing sense that key areas are "lost," "industrialized," or "no longer safe," especially among Elders;
- Upstream and downstream effects of adding 4,800 MW of power generation, likely stimulating further large-scale development across the region;
- Increased pressure from a growing industrial workforce, who may further strain hunting, fishing, and recreational areas used by the CLMN.

6.3 Cumulative Effects in a Region Under Pressure

The Peace River region is already subject to intense industrial activity. The cumulative effects of adding a major nuclear facility to this context must be thoroughly assessed.

Cumulative impacts include, but are not limited to:

- Farming expansion and land clearing, including posted, fenced, private and leased lands that restrict CLMN access along the Peace River corridor;

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- Extensive oil and gas activity, including well pads, pipelines, compressor stations, flaring sites, and seismic lines;
- Forestry cutblocks and road networks, which fragment wildlife habitat and enable unauthorized access;
- Hydrological alteration of the Peace River, including water withdrawals, discharges from pulp mills, and runoff from agriculture and urban development;
- Industrial wastewater and infrastructure from the Town of Peace River;
- Mercer Pulp Mill operations, which contribute to air and water quality concerns;
- Gravel pits, sand extraction, and agricultural encroachment, which reduce intact areas needed for harvesting and gathering;
- Climate change impacts, including lower snowpack, shrinking wetlands, rising temperatures, and increased wildfire risk.

These pressures already limit CLMN's ability to exercise its rights. The addition of the Project to a very busy landscape could enhance and deepen stressors already being felt by the CLMN People.

6.4 Human Health Risks and Community Avoidance

The proximity of the proposed nuclear facility to CLMN members living in Cadotte Lake and Peace River raises serious concerns about health and safety, including both real and perceived risks:

- Concerns about water and air contamination, including bioaccumulation in fish, wildlife, and traditional food sources;
- Fear and anxiety about the storage of spent nuclear fuel, especially if on-site storage becomes long-term due to delays in developing a deep geological repository;
- Psychological impacts, including increased stress, trauma, and reduced land use confidence;
- Disruption of healing practices and wellness for Elders and youth who rely on land-based activities and medicines;

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- Seismic activity near Harmon Valley, potentially induced by oil and gas operations, heightens concerns about the long-term safety of a nuclear facility;
- Lack of emergency planning with Indigenous communities, including evacuation protocols, trust-building, and community readiness.

In many cases, CLMN members may choose—or be forced—to avoid areas they once used for harvesting, ceremony, teaching, and healing. Even voluntary avoidance caused by fear or perception of risk constitutes an important impact on CLMN's rights and culture, and must be addressed in the assessment.

7. Need for a Robust and Inclusive Impact Assessment Process

The proposed Peace River Nuclear Power Project is not a routine infrastructure project. It represents a multi-decade, multi-billion-dollar industrial transformation of a landscape that is central to the rights, culture, and ongoing existence of the Cadotte Lake Métis Nation (CLMN). Accordingly, CLMN calls for the broadest and most inclusive possible federal impact assessment process—one that centres Indigenous perspectives, knowledge systems, and governance roles throughout.

A conventional, technocratic environmental review will not suffice. The complexity, duration, and sensitivity of this Project—combined with its siting in a culturally and ecologically important Indigenous landscape—demand enhanced procedures, deeper engagement, and full participation of affected Indigenous Peoples as decision-making partners.

7.1 Meaningful Scope of Assessment

CLMN urges the Impact Assessment Agency of Canada (IAAC) to ensure that the scope of the federal assessment is expansive and rooted in Indigenous rights. This includes, at minimum, the following five areas:

7.1.1 Rights-Based Assessment

The assessment must go beyond environmental effects and examine how the Project may impact section 35 rights, including:

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- Hunting, trapping, fishing, and gathering;
- Access to land, waters, and traditional travel routes;
- Cultural and spiritual practices, including ceremonies and sacred sites;
- Land-based education, knowledge transfer, and youth mentorship;
- Governance rights and the exercise of Indigenous law within Traditional Territory.

These elements are not ancillary—they are core to the Nation's existence and must be treated as central assessment factors.

7.1.2 Cumulative Effects Assessment

Given the numerous overlapping forms of development within its Traditional Territory, including oil and gas, forestry, agriculture, hydroelectric infrastructure, and industrial pollution, the assessment must:

- Evaluate how the proposed Project will compound existing stressors on the landscape and Métis land use;
- Include climate-related changes, such as declining wildlife, shifting hydrology, and increased wildfire risk;
- Consider the total burden on the Nation's ability to continue practicing its rights meaningfully.

If the regional landscape is so fragmented, contaminated, or industrialized that traditional use becomes impractical or unsafe, this must be identified, measured, and addressed.

7.1.3 Alternative Means and Siting Options

Under section 22(1)(f) of the *Impact Assessment Act*, federal assessments must include:

"…alternative means of carrying out the designated project that are technically and economically feasible and the effects of those means."

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Accordingly, the assessment must:

- Evaluate whether placing a nuclear facility within a sensitive Indigenous cultural landscape is appropriate or necessary;
- Examine alternate siting options outside of known Indigenous Traditional Territories;
- Consider non-nuclear alternatives, such as renewables or distributed energy systems;
- Assess the risks of locating nuclear infrastructure near zones of induced seismicity, including from hydraulic fracturing.

The alternatives analysis must be evidence-based and informed by Indigenous values—not limited to cost or proponent convenience.

7.1.4 Emergency and Waste Management Planning

The review must include a rigorous evaluation of:

- Emergency preparedness, including Indigenous inclusion in planning and communication;
- Modelling of impacts and risks of an array of accidents, risks, malfunctions including the possibility of a catastrophic failure at the plant;
- On-site storage, containment, and transport of radioactive materials;
- Scenarios in which the Nuclear Waste Management Organization's (NWMO) Deep Geological Repository is delayed, denied, or fully allocated to Ontario-based nuclear expansion;
- Intergenerational implications of leaving high-level radioactive waste on-site long term;
- Trust, responsibility, and long-term liability associated with managing nuclear risks in perpetuity.

These considerations must be informed by Indigenous legal principles, land ethics, and community-defined thresholds for risk.

7.1.5 Inclusion of Indigenous Knowledge and Governance

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CLMN insists that Indigenous Knowledge (IK) and Métis governance must be fully integrated into the assessment process. This includes:

- Recognition that IK is not supplementary, but an equal and necessary knowledge system;
- Mechanisms for CLMN knowledge holders to define key criteria, thresholds, and indicators for environmental and cultural impacts;
- Support for community-led research, mapping, and knowledge documentation;
- Inclusion of CLMN as a reviewing authority or co-decision maker, consistent with the federal government's commitment to reconciliation and the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP).

The assessment must not only consult Indigenous Peoples—it must empower Indigenous governments to shape and oversee decisions affecting their homelands and future generations.

8. Capacity Funding and Procedural Equality

The CLMN cannot participate meaningfully in a multi-year, highly technical impact assessment of a nuclear facility without substantial and sustained capacity support. Participation in such a process requires more than invitations or access to public documents—it requires resources, technical expertise, and procedural equality to engage on fair terms with proponents, regulators, and government decision-makers.

CLMN is a self-determining Métis Government with rights, responsibilities, and cultural obligations. Like any level of government or stakeholder involved in this process, it must be resourced appropriately to fulfill its roles.

Accordingly, CLMN requires capacity support for:

- Legal counsel, to protect and advance the Nation's rights throughout the regulatory and assessment process;
- Independent technical experts, including nuclear engineering, hydrogeology, radiation safety, and energy system planning specialists, to review proponent claims and provide credible, community-informed analysis;
- Traditional Knowledge and land use researchers, to document CLMN's own knowledge systems and prepare Indigenous-led assessments;

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- Travel, facilitation, and administrative coordination, to ensure full participation of community members, Elders, youth, and knowledge holders at every key stage.

8.1 Procedural Fairness and the Duty to Accommodate

Consultation is not meaningful if the CLMN:

- Cannot access or interpret technical information;
- Is denied sufficient time or support to respond;
- Faces bureaucratic delays in receiving funding;
- Is excluded from critical design or decision-making tables.

The principle of procedural fairness requires that Indigenous governments are provided with the same level of access, respect, and influence as other actors involved in regulatory processes.

CLMN emphasizes that the Crown's constitutional duty to consult and accommodate cannot be discharged without ensuring that Indigenous Nations are resourced to participate on an equal footing. Procedural equality is not a favour—it is a legal requirement and a foundation for honourable Crown conduct.

8.2 Justice, Law, and the Future

This Project must not be reviewed as a matter of administrative compliance alone. It is a test of Canada's commitment to constitutional law, reconciliation, and environmental justice.

CLMN remains willing and prepared to engage constructively. But this engagement must be based on recognition of:

- Our inherent rights as Métis People;
- Our knowledge and relationships to the land;
- Our self-determined role as stewards and decision-makers in our Traditional Territory.

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The impact assessment must reflect not only environmental factors but also the values, voices, and rights of Indigenous Peoples who will live with the consequences for generations to come.

Classification: Protected A

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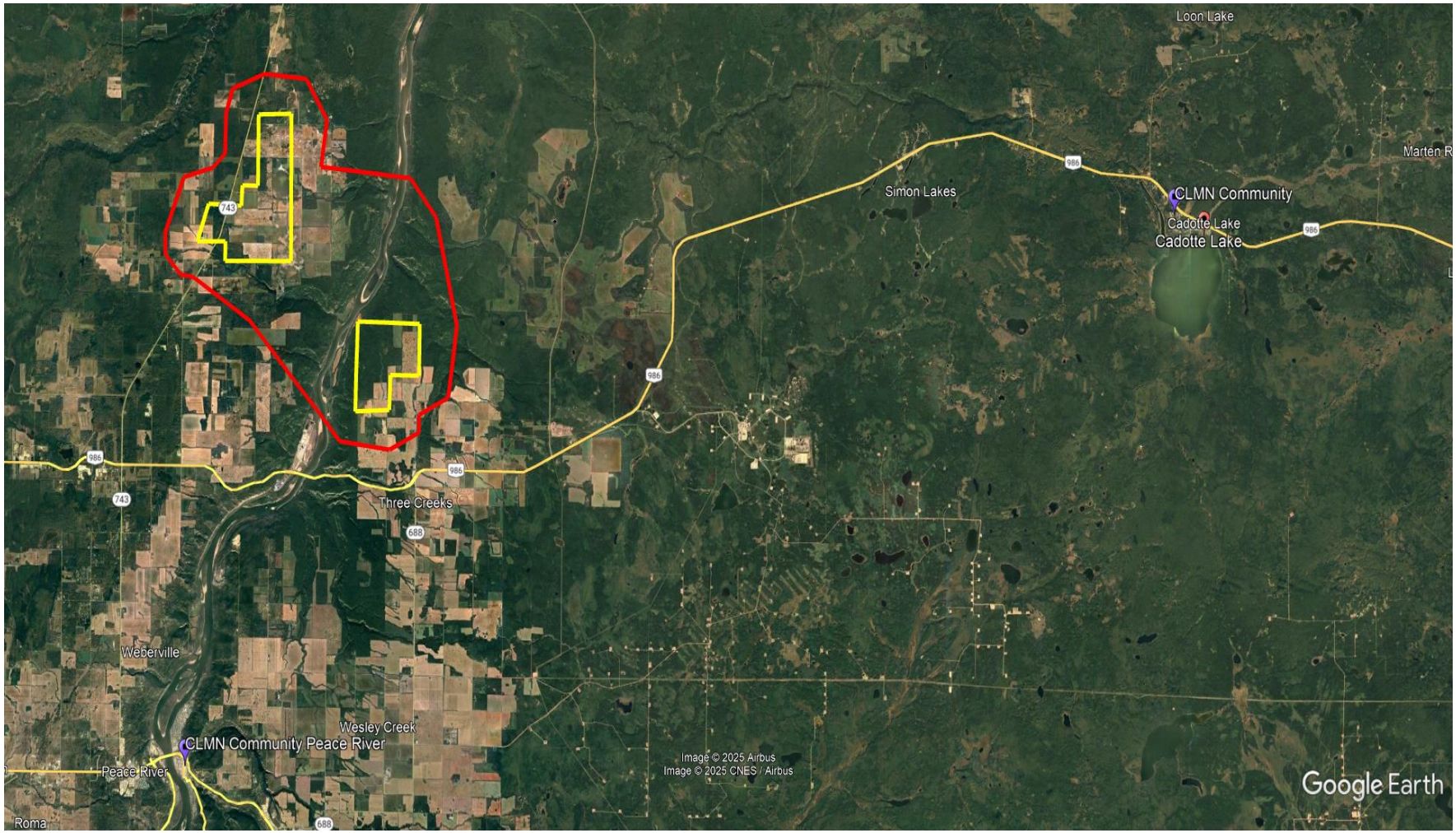

Google Earth Image 2025 (Approximated):
Proximity of Cadotte Lake Metis Nation Communities to Peace River Nuclear Power Project

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