



Lakeland Métis Nation

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Impact Assessment Agency of Canada
Attn: Peace River Nuclear Power Project Assessment Team
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October 20th, 2025

RE: Peace River Nuclear Power Project – Summary of Preliminary Concerns through the Assessment Planning Phase

Dear Sir/Madam,

Please accept this letter outlining our concerns, recommendations, and interests related to the Initial Project Description (IPD), draft Tailored Impact Statement Guidelines (TISG), and draft Indigenous Engagement and Partnership Plan (IEPP) for the Peace River Nuclear Power Project. Energy Alberta (the Proponent) is proposing the construction and operation of two twin CANDU MONARK nuclear reactors near the town of Peace River, Alberta (the Project). This Project is located upstream and in proximity to lands and waters historically and actively used by the Lakeland Métis Nation (Lakeland Métis or LMN) for the purpose of exercising rights described under section 35 of the *Constitution Act, 1982*. As a result, the Project holds the potential to adversely impact the rights and interests of the LMN.

OUR BACKGROUND

The LMN is a historic and contemporary Métis community with deep ties to the lands and waterways of what is now northern Alberta. Lakeland Métis members trace their ancestry back to unions between Indigenous people in the Lac La Biche area and the earliest fur traders associated with the North West Company in the late 1700s. The extended families established from these bonds created a unique way of life based on hunting, fishing, trapping, and gathering. The historic Lac La Biche Métis supported their large families through the Métis way of life, which combined living off the land with domestic agriculture and employment in the fur trade as carpenters, traders, freighters, and voyageurs.

Today, the LMN asserts and protects the rights of its members to pursue the traditional Métis way of life through engagement and consultation with various levels of non-Métis governments, industry, and civil society groups. The LMN offers a variety of programs and services to its members, including consultation and engagement, traditional harvesting camps, food security programs, community-based environmental monitoring, and support for residential school survivors. The LMN is governed entirely by an elected Board of dedicated volunteers who proudly



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represent a vibrant contemporary Métis community, as identified through community research, demographic analysis, and historical assessment. The LMN is an independent and self-governing Métis community. We are not affiliated with, nor do we recognize the authority of, any other Métis organization or entity to speak on our behalf. At no time will the LMN authorize any external Métis body to represent or interpret our collective section 35 rights.

CONCERNS AND EXPECTATIONS FOR MEANINGFUL CONSULTATION

The LMN asserts that this Project triggers the requirement for free, prior, and informed consent (FPIC) because it involves the proposed creation and storage of hazardous and radioactive nuclear waste in the Peace River region. While details on this aspect remain limited, Article 29(2) of the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP) makes it clear that no hazardous materials can be stored or disposed of on Indigenous lands without FPIC. The Federal Court of Canada has confirmed that this standard applies to decisions made by the Canadian Nuclear Safety Commission, meaning it must be addressed early in the review and approval process.

The LMN has serious concerns about both the process and the potential outcomes of this Project. beyond procedural rights, we face the prospect of significant impacts to our section 35 rights, the integrity of the Athabasca and Peace River systems, regional ecosystems, and the well-being of our members. This development is large in scale, unprecedented in nature for the region, and would add to the already heavy cumulative industrial pressures on Crown lands and waters we actively use for harvesting, cultural practices, and passing knowledge to future generations.

We are particularly concerned with the unique risks associated with nuclear power, including the secure long-term containment of radioactive waste, the potential contamination of surface and groundwater, and the safe handling and disposal of process water. Experience from other nuclear projects has shown that even routine releases can travel long distances, creating risks far beyond the facility itself.

The LMN expects a decision-making process that provides genuine, rights-based engagement and ensures our consent is sought and obtained before any hazardous storage activities are approved within our traditional territories.

OUR RELATIONSHIP WITH THE PEACE RIVER AND PEACE-ATHABASCA DELTA

As part of the historic Lac La Biche Métis community that emerged at the start of the nineteenth century with strong, direct connections to the Fort McMurray and Lake Athabasca area, members of the LMN have and continue to exercise their protected Aboriginal rights. Our presence through the Athabasca River corridor extends into the Peace-Athabasca Delta, the Peace River, and in areas surrounding Peace River itself. Here, our members continue the traditions of our ancestors, harvesting fish, animals, and plant materials to support our way of life.



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The area surrounding Peace River and McLennan holds deep environmental, cultural, and personal significance for the LMN and our families. Our ongoing use of places like Leddy Lake and Carmon Creek reflects more than recreation, it represents our continued Métis presence, cultural learning, and stewardship in a region that has supported our people for generations. Any proposed industrial development, especially a project as large as this nuclear proposal, should be viewed not only through an environmental lens but also through the lens of Métis cultural continuity, community well-being, and safety.

Leddy Lake

The Leddy Lake area holds longstanding cultural and personal significance for LMN citizens and their families. Located close to the proposed nuclear site, it is an important gathering place where LMN members continue to harvest berries, medicinal plants, fish, hunt, camp, walk the Leddy Lake Trail, and spend time on the land. These visits are more than recreational—they reflect an ongoing Métis presence and a commitment to cultural learning and stewardship.

Leddy Lake is a place where intergenerational knowledge is shared, where community members teach and learn about Métis ways of life, environmental respect, and land stewardship. Its proximity to the proposed development heightens concerns about potential impacts on both environmental integrity and cultural continuity.

Carmon Creek

The Carmon Creek area, situated roughly 33 km northeast of Peace River, is ecologically rich and culturally meaningful. Known for its upland and riparian habitat, Carmon Creek supports elk, moose, deer, black bear, and a wide range of bird species. It forms part of the Three Creeks watershed, which the Mighty Peace Watershed Alliance recognizes as critical for water quality, habitat connectivity, and flood regulation.

The area already has a conservation designation, reflecting its environmental importance. LMN citizens regularly visit Carmon Creek to fish, walk, and learn from the land—activities that strengthen cultural identity, environmental awareness, and family ties. Protecting this area from further industrial disturbance is vital to maintaining both ecological integrity and Métis cultural practices.

McLennan and Peace River

The broader McLennan and Peace River region is central to LMN's cultural landscape. LMN citizens continue to harvest berries, medicinal plants, fish, and hunt in these areas for personal and family use, supporting traditional practices and community well-being. These activities are deeply social and cultural—not commercial—and help sustain knowledge transfer, wellness, and family connections.

This region reflects longstanding Métis movement, hunting patterns, and settlement across northern Alberta. Historic travel routes and seasonal harvesting areas continue to anchor families to the



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landscape today. The continued use of these lands demonstrates the unbroken relationship between Métis people and the Peace River region—linking generations past, present, and future.

Cultural Continuity and Environmental Importance of the Peace River Region

The lands and waters surrounding Peace River, McLennan, Leddy Lake, and Carmon Creek hold enduring environmental, cultural, and personal significance for the citizens and families of the LMN. These interconnected areas are places of gathering, learning, recreation, and stewardship that reflect the living continuity of Métis identity and land use across northern Alberta.

LMN citizens continue to camp, fish, walk, and gather at places such as at Leddy Lake, and the Carmon Creek. These activities are not merely recreational—they are acts of cultural expression and knowledge transmission, where intergenerational learning takes place and respect for the land is actively practiced. Family and community-based harvesting, including berry picking, fishing, and hunting for personal and cultural use, remain active traditions that support food security, well-being, and cultural resilience.

The deep connection LMN citizens maintain with these areas is part of a broader Métis history in northern Alberta. For generations, Métis families have moved along traditional travel routes and seasonal harvesting areas throughout the Peace River region, forming patterns of land use that extend far beyond any single site. It is this ongoing movement which define the exercise of Métis rights, and which connects LMN citizens to Lac La Biche, Fort McMurray, Lake Athabasca, the Peace River, and much of northern Alberta. These lands remain integral to LMN identity today, linking families to their history while sustaining present-day cultural practices.

However, the proposed nuclear power project near Peace River raises serious concerns for LMN. Beyond the risks of water contamination, habitat disruption, and restricted access, such a project threatens to undermine the cultural fabric of these places. Families may no longer feel safe bringing children or Elders to camp, harvest, or teach on the land, jeopardizing the transmission of traditional knowledge and practices. These concerns compound existing cumulative pressures from industrial development, which have already impacted wildlife and Métis harvesting rights in the region.

In summary, the Peace River, McLennan, Leddy Lake, and Carmon Creek areas together represent a living cultural landscape where environmental health and Métis cultural continuity are deeply intertwined. Any major industrial development—especially one of the scale proposed—would pose significant risks not only to the ecological integrity of the watershed but also to LMN's ability to maintain its rights, cultural presence, and intergenerational relationships with the land across northern Alberta.

OUR PARTICIPATION IN THE PROJECT IMPACT ASSESSMENT

The LMN seeks opportunities to build a strong, enduring relationship with the Proponent through the life of this project. We also seek to work with the Impact Assessment Agency of Canada (IAAC), the Canadian Nuclear Safety Commission (CNSC), and other applicable regulators or representatives of the Crown to fully understand the implications of the Project, identify



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opportunities to avoid, mitigate, and accommodate impacts, and ultimately advance a meaningful assessment process that works towards achieving our consent.

This letter outlines our initial review of the IPD, TISG, and IEPP, expressing concerns and providing recommendations for how the Impact Assessment process can be scoped to ensure it fully contemplates the potential impacts of the Project on Lakeland Métis’ rights, interests, and values. Notably, we have identified the following elements, which we see as essential to achieving this goal, including:

- Collection of Lakeland Métis land use and occupancy, and assessment of Project interactions
- Collection of baseline psycho-social conditions aimed at understanding the LMN relationship with the land and water, assessment of how the Project may alter perceptions and behaviours, and mitigations or programming aimed at addressing ongoing concerns
- Collection of baseline Human Health and Country Foods assessment, with a focus on understanding how water, plants, and animals consumed by Lakeland Métis members may be impacted by radioactive and non-radioactive contaminants
- Communication, engagement, and information sharing with our community. Ensuring that our members understand the implications of the Project and have a clear voice in providing feedback to the Proponent

The following sections elaborate on these essential components, outlining preliminary interests, concerns, and requests for partnership and participation in the assessment. We anticipate that as additional information becomes available through the assessment process, these preliminary interests, concerns, and requests will evolve. To this end, we expect that LMN will be positioned to lead the collection and assessment of information of greatest importance to our community, as well as have that information not only inform the assessment, but ultimately inform the decisions related to the approval of the Project.

PRELIMINARY VALUED COMPONENTS AND INTERESTS

Based on Lakeland Métis rights, values, interests, as well as the use of lands and resources surrounding the proposed project, we have identified several Valued Components that are of specific interest to be evaluated through the course of this Impact Assessment:

Technical Area	Values, Concerns, and Interests
Human Health (including Psycho-Social Well-Being)	<ul style="list-style-type: none"> • Lakeland Métis value lands and waters where they can safely harvest country foods (plants, animals) and consume them for nourishment • Lakeland Métis are concerned about the potential impacts to human health and the environment, including the potential



Technical Area	Values, Concerns, and Interests
	<p>for contaminants making their way into the food web as a result of normal project activities or accidents</p> <ul style="list-style-type: none"> • Lakeland Métis members have expressed fear, uncertainty, and general unease as a result of the potential effects of radiation if released to the environment. This may result in behavioral modification, including a reluctance to harvest or exercise rights near or downstream of the facility • Lakeland Métis are concerned that project unknowns may perpetuate perceived effects, even if the project is not having direct effects on the biophysical environment
Socio-Economic and Well-Being	<ul style="list-style-type: none"> • Lakeland Métis value meaningful jobs and economic opportunity for our members • The Project should allow for the continuance of traditional economies as well as resource extraction-based economies • Economic development must complement land stewardship and our ability to maintain traditional economies.
Land Resource Use	<ul style="list-style-type: none"> • Lakeland Métis harvest throughout northern Alberta, extending into the Peace-Athabasca Delta and Peace River. The Peace River is also connected to the Athabasca River drainage via natural and regulated flooding into the Peace Athabasca Delta and is therefore connected to the Athabasca River system. Any radiation or discharge effects in the Peace River water, fish or aquatic resources therefore have the potential to enter the Athabasca River system • While both historic and contemporary use by Lakeland Métis in both the Peace-Athabasca Delta and Peace River is widely known in our community, this knowledge has not been extensively documented. To fully appreciate potential Project interactions and impacts, it is necessary to conduct an Indigenous Knowledge and Land Use Study. <p>Use in the area potentially impacted by the project includes:</p> <ul style="list-style-type: none"> • Fishing for a wide range of species • Hunting for Elk, Moose, Deer • Trapping for fur bearers • Harvest of plants and berries for consumption and use • Cultural reproduction • Overnighting and travel <p>Lakeland Métis are also generally interested in maintaining the health and well-being of</p> <ul style="list-style-type: none"> • Ungulates and Furbearers • Woodland caribou



Technical Area	Values, Concerns, and Interests
	<ul style="list-style-type: none"> • Small mammals • Raptors and migratory breeding birds • Bird species at risk • Access to land base and cultural sites
Fisheries and Aquatics	<p>Lakeland Métis value and rely on access to healthy waters. Because of this, we have identified a clear need to consider impacts to:</p> <ul style="list-style-type: none"> • Fish habitat and Fish health • Aquatic habitat • Wetlands • Water Quality • Loss of water levels • Access to lakes/rivers • Northern Pike • Lake Whitefish • Lake Trout • Walleye
Wildlife and Terrestrial	<p>Similarly, Lakeland Métis relies on access to healthy lands, wildlife, and plants. Because of this, we have identified a clear need to consider impacts to:</p> <ul style="list-style-type: none"> • Woodland caribou and habitat • Moose and habitat • Small mammals (for fur) – wolf, beaver, otter, mink, fox, fisher • Blueberries • Cranberries • Other wild edibles
Archaeology	<ul style="list-style-type: none"> • Stemming from the fur trade and continuing into the present day, Lakeland Métis have had extensive use in the region. As a result, there is significant potential for cultural and archaeological Sites. • Robust assessment is necessary in association with the Project, reflecting how Lakeland Métis did and do utilize the land.

Although Lakeland Métis have made an effort to outline a detailed list of values and interests as it relates to this Project to inform the development of the final TISG, however, we do not feel this is a comprehensive description of all Lakeland Métis Valued Components or indicators.

Concern: Lakeland Métis are concerned that the community’s values and interests have not been included thus far in the assessment process, and to do so, a comprehensive Valued Component and indicators workshop would be an effective way for the Proponent to hear directly from our members their interests.



REVIEW OF THE IPD, TISG, AND IEPP

Lakeland Métis has identified several concerns, as well as opportunities and interests for further study to be included in the TISG and resulting Impact Statement document. The review focused on elements of the Valued Components which have been identified by the LMN, and the potential for the Project to impact these key areas.

Engagement and Participation

Lakeland Métis wants to draw attention to the IEPP document, which currently does not include Lakeland Métis as part of the consultation process. Lakeland Métis citizens are concerned that the Project may result in both direct and indirect impacts to our territory and traditional land uses. If excluded from the consultation process, Lakeland Métis members cannot adequately participate in further identifying threats posed by the Project, through engagement with the Proponent. The IEPP states that the list of Indigenous Nations and Communities may change as knowledge of the adverse effects within federal jurisdiction and potential impacts of the project is gained. The TISG states that the degree of consultation or engagement will be proportionate to the information provided by the Indigenous Nations. The LMN is committed to advocating for our members' rights and values and wants an opportunity to meaningfully contribute its perspectives on the potential pathways of impact from the Project.

- **Request:** The LMN requests that IAAC, CNSC, and the Proponent work with Lakeland Métis to develop a tailored engagement and partnership plan for Lakeland Métis. This plan should, at a minimum, outline specific opportunities for Citizen engagement, information sharing activities, Lakeland Métis-led studies, and capacity support. The LMN also seeks to develop the foundation for a lifecycle relationship aimed at ensuring Lakeland Métis' appropriate participation in construction, operation, closure, and post-closure, if this project is approved.

Socio-Economic Considerations

Lakeland Métis values meaningful job and economic opportunities for its members. The IPD states that the growth of nuclear power in Canada will create a sustainable job market due to the size and number of workers needed to build and operate nuclear plants. Per the IPD, the Peace River nuclear power project will require 33,500 full-time equivalent jobs per year over a nine-year period during the construction of the four reactors, and once operational, the project will sustain 3,500 full-time equivalent jobs per year for its 70-plus year operating life. It is acknowledged that the Proponent has identified the opportunity for partnerships with Indigenous Nations and Communities throughout the Project, including the development of technical skills for workers and building capacity. The TISG has outlined that the Impact Statement must describe the anticipated labour requirements of the Project, including workforce development opportunities, but it is unclear what priority (if any) will be given to Indigenous workers, and how that priority framework will include Métis Nations such as Lakeland Métis. Lakeland Métis sees the value that this Project may bring for economic benefits to its citizens, while still emphasizing the importance of maintaining



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traditional economies that may be impacted simultaneously. It is therefore essential that the Proponent clearly articulate both the benefits and impacts of this Project.

- **Concern:** Without a socio-economic baseline assessment, Lakeland Métis cannot adequately assess the unique opportunities and challenges our citizens will face. This Lakeland Métis-led assessment would help inform the overarching socio-economic effects assessment and benefit maximization strategy.

Distinctions-Based Assessment Approaches and Mitigations

The TISG outlines a requirement for the Proponent to conduct a gender-based analysis (GBA Plus) to analyze historically excluded or underrepresented groups, including Indigenous Nations and communities. Lakeland Métis strongly supports the use of a GBA Plus lens, however, emphasizes that the Proponent and Crown representatives must consider impacts and opportunities through a distinctions-based lens.

- **Concern:** The history, experience, culture, needs, and values of LMN is unique and distinct from other groups affected by this project. This includes but is not limited to how LMN members exercise rights in proximity to the proposed Project. LMN is concerned that as presented, neither the Proponent nor IAAC/CNSC has made specific effort to consider the impacts of the Project on the unique exercise of rights by LMN or Métis communities generally, with the consequence being that measures aimed at minimizing impacts will not be effectively tailored.
- **Recommendations:** Both the IEPP and the TISG must set clear expectations for the assessment to respect distinctions-based approaches, reflecting the unique rights, interests, and values of the LMN.

Human Health and Wellness

Human health is of utmost importance to LMN, which includes the physical and mental well-being of its citizens. In addition to well known risks to physical health, nuclear power poses a number of psycho-social impacts to those who reside nearby and exercise traditional harvesting rights in the region surrounding the proposed project site.

Global experience has shown that nuclear accidents can have impacts that extend far beyond the boundaries of a project footprint. The 1986 Chernobyl disaster in Ukraine resulted in radioactive fallout being detected across Europe, with contamination persisting for decades in soils, water, wildlife, and the food chain. In some areas, restrictions on consuming wild game and fish remain in place nearly forty years later.

The 2011 Fukushima Daiichi disaster in Japan demonstrated that even in a technologically advanced nation, natural disasters and unforeseen failures can lead to large-scale radioactive releases. Contamination from Fukushima affected hundreds of kilometres of coastline, displaced



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communities, and caused long-term damage to fisheries and agricultural production. The impacts continue to be felt today, both environmentally and economically.

These incidents clearly illustrate that radioactive contamination is not contained by arbitrary distances such as a 50–100 kilometres radius. Radionuclides can travel vast distances by wind and water, affecting regions and peoples who are far removed from the original site. For LMN, whose members rely on interconnected waterways like the Athabasca and Peace Rivers, the risk is not limited to the immediate project area — contamination could move downstream and into the heart of our traditional territories, threatening the lands, waters, and resources that sustain our culture and rights.

The perceptions associated with nuclear power plants tend to be that even if the site is technically “safe” from a scientific standpoint, people fear the worst outcomes and consciously choose to avoid adjacent areas. Considering this would be Alberta’s first nuclear power plant, there are many “what ifs” that will undoubtedly prevent people from wanting to exercise traditional land use, harvesting, and recreational activities in the area, as well as cause undue mental and emotional stress.

- **Concern:** The development of a nuclear generating facility will introduce low, medium, and high-grade radioactive material and waste to the area. Planned or foreseen project activities will result in the release of radioactive particles into the environment (e.g., water and effluent discharge, groundwater interactions, and fugitive dust emissions). Similarly, unforeseen activities or events (e.g., transportation accidents, facility accidents, environmental disasters such as earthquakes or forest fires), may also result in the release of material to the environment. Once contaminated material enters the uncontrolled environment, it may adversely affect ecosystem function, and the health of consumers of country foods.

LMN members maintain a two-fold concern as it relates to the presence and potential release of radioactive material:

- (1) Biophysical or realized effects – If the facility, through planned, or unplanned activities or events, releases radioactive contaminants in a quantity sufficiently great, it may result in detrimental consequences to wildlife, fish, plants, as well as those who consume country foods such as LMN members. Such an instance would result in LMN members either being unable to harvest from affected areas or to do so with risk to their health.
- (2) Psychological or perceived effects – As described above, the mere presence of a nuclear facility in proximity and upstream to areas utilized by LMN members for harvest and the exercise of their right can induce fear, anxiety, or other psychological effects. These effects may influence behaviour of LMN members resulting in the avoidance of areas perceived to be affected by radioactive material. While these perceptions may not be substantiated, the impact of behavioural



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modification resulting in a change or loss in the exercise of rights is tantamount to that of biophysical or realized effects.

Through either pathway the nature of the facility, set within the context of global nuclear experience, represents a potential impact to LMNs rights, which must be examined fully within the scope of the Impact Assessment.

- **Recommendation:** With the understanding that the effects of a nuclear project may be real or perceived, a behaviour response to these effects is an impact on our rights. It is therefore necessary that a baseline psycho-social condition be collected. A Lakeland Métis-led baseline study must be aimed at understanding the Lakeland Métis relationship with the land and water, to assess how the Project may alter perceptions and behaviours. Ultimately, we anticipate the potential for psycho-social conditions to respond over time to the Project, as a result, this information is critical to inform appropriate mitigations and programming.

Lakeland Métis value the lands and waters where they can safely harvest country foods (plants, fish, wildlife) and consume them for nourishment. There is concern regarding the potential for contaminants to enter the food web as a direct result of Project activities and/or unforeseen accidents. If there is a fear of consuming traditional sources of food, there will be repercussions for both the physical and mental well-being of Lakeland Métis citizens. Section 9.1 of the TISG outlines requirements for the Proponent to develop community health profiles “that describe the overall biophysical, social and economic health of each Indigenous Nation and community and local community including baseline information”. Lakeland Métis feels that this assessment must include its citizens given the multiple pathways of impact from the Project.

- **Concern:** There is need for a Lakeland Métis-led collection of baseline Human Health and Country Foods assessment, with a focus on understanding how water, plants, and animals consumed or used by Lakeland Métis members may be impacted by radioactive and non-radioactive contaminants.

Land Use and Occupancy

Lakeland Métis traditional harvest territory extends into the Peace-Athabasca River Delta, as well as upstream into the Peace River. However, Indigenous Knowledge and Land Use Occupancy (IKLUO) data are limited. This knowledge gap makes Lakeland Métis citizens more vulnerable to potential impacts, and therefore, it is critical that the TISG include a requirement for the Proponent to fund and facilitate an IKLUO study to aid Lakeland Métis in understanding the spatial extent within the Peace River and Peace-Athabasca Delta where Lakeland Métis citizens exercise their rights. This information will inform and influence the magnitude of impacts to Lakeland Métis from the Project. The inclusion of this study as a requirement of the TISG will also help alleviate anxieties that are directly associated with the numerous uncertainties surrounding the Project.



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- **Concern:** LMN members utilize lands and waters within the Athabasca River corridor, and Peace-Athabasca Delta extending upstream into the Peace River, as well as areas further inland, both to the west and east. LMN members utilize lands and waters to harvest wildlife, birds, fish, and plants for consumption and use, practices which are protected as Aboriginal rights. Several effects pathways exist which may threaten how LMN members can use lands and waters, including water takings/use, water/effluent discharge, release of radioactive and non-radioactive contaminants via atmospheric and aquatic pathways, and direct land conversion, to name a few. As LMN members exercise rights in the area which is downstream, and generally downwind (based on dominant wind patterns), changes in water levels, and release of contaminants may impact LMN's ability to use the land in affected areas. Additionally, as LMN members rely on the harvest of many migratory species of wildlife, birds, and fish, the movement of species may further facilitate the movement of contaminants or otherwise be impacted by regional loss of habitat and migration corridors.

LMN cannot fully assess potential impacts to its members without a Lakeland Métis-led collection of land use and occupancy data, and an assessment of Project interactions.

- **Recommendation:** In order for LMN to understand and appropriately assess impacts to rights, two elements are needed:
 - (1) Development of a robust understanding of all potential contaminant pathways and geographic extent of project influence, as well as fish, bird, and wildlife migration corridors/refugia
 - (2) Development of a robust understanding of LMN land use and occupancy within the Peace River, Peace-Athabasca Delta and extent of project influence.

Fish, Fish Habitat, and Water Quality

Water quality and quantity are both important factors in determining the impacts to aquatic resources, all of which are identified as Valued Components by Lakeland Métis. The health and diversity of aquatic species that are harvested by Lakeland Métis citizens is critical to sustaining a traditional way of life. Lakeland Métis is concerned that there may be negative impacts to species that are culturally significant, such as northern pike, lake whitefish, lake trout, and walleye. The Peace River watershed is already experiencing a considerable amount of anthropogenic impact. The IPD identifies that there are local instances of point (e.g., effluent from the Town of Peace River) and non-point (e.g., agriculture, forestry, oil and gas exploration, and pipelines) sources of contamination that directly impact the water quality of the Peace River near the proposed Project site. Introducing an additional potential point-source of contamination warrants thorough examination of the existing health of the watershed. The IPD states that the closest surface water quality monitoring station (with the most representative publicly available long-term monitoring data) is located 50 km downstream of the Project. Lakeland Métis is concerned that establishing background water quality (representative of natural conditions in the Peace River) will be difficult,



considering all the other sources of contamination that already exist. The TISG should include a requirement for a detailed consideration and selection methodology for identifying appropriate background monitoring locations for surface water. Establishment of a reliable background water quality station is critical for determining the level of potential impacts from the Project.

- **Concern:**

- (1) LMN is concerned that water takings and use, especially when combined with other water usage along the Peace River (e.g., Site C, W.A.C. Bennett Dam), may adversely affect fish habitat downstream of the Project.
- (2) LMN is further concerned that water use, and effluent (or other water) discharge may alter the characteristics of the Peace River and Peace-Athabasca Delta as a result of contributions of radioactive or non-radioactive contaminants, changes in temperature, or changes in other physical/chemical characteristics, which in turn may alter fish habitat, diversity, or prey availability.

- **Recommendation:** To characterize potential impacts to fish, fish habitat, and water quality, there is a need for careful selection/determination of background conditions, and inclusion of far-field water quality stations for baseline assessment in the Peace-Athabasca Delta.

The IPD states that while ten of the fish species documented within the Peace River system are listed either provincially or federally on species at risk (SAR) lists, none of the species documented within 5 km of the Project are federally listed under the Species at Risk Act (SARA) or provincially listed within the Alberta Environment and Protected Areas (AEPA). Lakeland Métis is concerned that applying only a 5 km radius to fish that move up- and downstream within the Peace River is not an adequate assessment of the existence (or potential existence) of SAR that may be impacted by the Project. If contamination were to occur as a result of the Project, fish are a likely pathway as they can travel great distances within the watershed and are consumed by other trophic levels, risking bioaccumulation.

- **Concern:** The assessment of aquatic SAR potential as well as a pathways of effects assessment if contamination were to occur as a result of Project activities, has not been adequately considered

Wildlife and Terrestrial Resources

Wildlife and terrestrial resources are an important part of Lakeland Métis cultural practices. Species of particular importance include woodland caribou, moose, small mammals (as a source of fur, e.g., beaver, otter, mink, fox, and fisher), and vegetation such as blueberries and cranberries. Further justification for the value gained by having the Proponent help facilitate a TKLUO study includes identifying the extent of traditional hunting and foraging sites for terrestrial plant and



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wildlife species. The IPD has identified that there are no records of federally or provincially listed terrestrial wildlife SAR within the footprint of either Option 1 or Option 2 for proposed site location. However, the IPD has described the project as including the construction of new access roads and setting up essential utilities like power and water. Construction of linear features such as roads and powerlines can have significant impacts on wildlife, such as disrupting migration routes and resulting in wildlife/vehicle collisions.

- **Concern:** LMN relies on the harvest of and spiritual connection with several migratory species (e.g., wolf, caribou, moose, waterfowl). The Project footprint will result in direct land conversion, destroying forest, wetland, and range habitats. Beyond the direct project footprint, the project and ancillary features (e.g., transmission lines, access roads), as well as the area of emissions discharge, will influence terrestrial habitat. LMN is concerned by the potential loss of migration corridors and calving or nesting habitat, as well as fragmentation of habitat that may impact populations of several species, as well as the available area for LMN members to exercise rights. Collectively the Project, its area of influence and support of ancillary features (e.g., transmission lines which although not considered within the scope of the assessment is a necessary artefact of the Project) may have a direct impact on terrestrial resources, and LMNs ability to utilize them.
- **Recommendation:** Given that Lakeland Métis values wildlife spiritually, for sustenance, as well as for traditional economic value, the TISG falls short of including a requirement that the Proponent conduct further study into the potential impacts of peripheral development associated with the primary nuclear reactor site, and how these features may influence existing wildlife corridors and migration routes.

Climate Change and Effects of the Environment on the Project

Climate change has the potential to negatively impact all the Valued Components that Lakeland Métis has outlined thus far. The IPD and TISG articulate the benefits of nuclear energy as being a low emitter of carbon dioxide, which can help Canada meet its climate targets. However, neither document identifies the need for the Proponent to conduct a climate change scenario modelling exercise, to sufficiently plan and account for potential future conditions at the selected site.

- **Concern:** LMN is concerned about the potential for climate change to interact with this project through two avenues:
 - (1) The Peace River is a working river with several large urban centres drawing from it, as well as three major dam projects (Site C Dam, the Peace Canyon Dam, and the W.A.C. Bennett Dam) which modify flows. While the Peace River is a large-scale river it is not immune to drought and low water conditions. This can be observed by regional drought issues observed in the Kiskatinaw River, a key tributary of the Peace River, which has recently seen record low levels. The Project will require the use of significant amount of water takings from the Peace River, which may



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exacerbate drought conditions which may increase due to climate change. The effect may be impacts on navigation and fish habitat downstream. Further, the Project's need for water is part of its operational safety – unlike other projects, there is no option for this Project to stop water takings for an extended period of time without risking operational issues. Therefore, the impacts of climate on water resources are of great concern to LMN.

(2) Wildfire represents a potential threat to the Project. As has been observed across Canada, the frequency and severity of fires is only increasing, due in part to climate change. While we recognize that under CNSC licencing obligations, the Project will need to develop a fire management and mitigation plan, however, the risk that is posed to the Project, including the viability of such a plan, must be assessed within the context of the IA.

- **Recommendation:** The TISG must include a requirement for the Proponent to conduct a climate change forecasting exercise to demonstrate how it will mitigate any predicted changes in conditions, such as water levels, shifting range/migration of fish and wildlife, wildfires, etc.

Concern:

The proposed Peace River Nuclear Project introduces significant environmental and psycho-social risks to LMN citizens who use these lands and waters. Potential contamination of surface water, alteration of wildlife habitat, and perceived threats to public and environmental safety may lead to avoidance of the area by LMN families, particularly those who bring Elders and youth to camp, harvest, and learn. These impacts would extend beyond physical disturbance, contributing to cultural loss and the erosion of Métis land use continuity within the Peace River basin.

Recommendation:

That the Impact Assessment include a requirement for a Lakeland Métis-led assessment of contemporary land use, harvesting, and psycho-social impacts specific to the Peace River–Carmon Creek region. This assessment should document the ongoing cultural, educational, and family-based use of the area and evaluate how both real and perceived risks associated with the nuclear project may alter LMN citizens' connection to the land and water.

CONCLUSION

Lakeland Métis raises concerns with IPD, TISG, and IEPP on several fronts. To better understand how the Project will impact its rights and socioeconomic conditions, and to begin to identify measures that would mitigate these impacts, we have identified the following gaps and recommendations:



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- Before any approval or construction, the Proponent will collaborate with Lakeland Métis on **meaningful consultation through extensive engagement** to identify potential Project impacts, mitigate effects, and develop ongoing monitoring plans.
- To consider the full extent of the Peace River nuclear power project on Lakeland Métis, we require a comprehensive and project-specific **Indigenous knowledge, land use and occupancy study** to be conducted to allow for full characterization of potential impacts.
- To better understand the potential impacts to Lakeland Métis rights and values from the Project, a **community health profile and GBA Plus analysis** would help characterize existing vulnerabilities within the community, along with appropriate community-led socio-economic baseline and impact assessment studies.
- Lakeland Métis would like to see the Proponent prioritize the **equitable distribution of benefits** from this project, including employment opportunities and capacity building.
- Lakeland Métis are concerned about the **potential impacts to water quality, including drinking water sources and downstream waterways** such as the Athabasca and Peace Rivers. It is important that the Proponent recognize their ecological, cultural, and subsistence importance to Lakeland Métis.
- The Proponent must demonstrate that adequate studies will be included in the Impact Assessment to characterize impacts from all construction activities, including road building, utilities access, and decommissioning. Furthermore, a **full cumulative effects assessment** is necessary that considers existing and foreseeable industrial activities in the region, including oil sands, forestry, and other energy projects, as well as potential radioactive contamination scenarios. Lakeland Métis would appreciate the opportunity to engage in the technical review of each project permit, application, and/or plan where decisions are contemplated which may adversely impact our rights and interests.
- A **comprehensive risk assessment** must be completed for the safe handling, storage, and disposal of nuclear waste, with clear long-term management plans developed in collaboration with Indigenous communities. The Impact Assessment should assess potential long-range transport of radionuclides, recognizing evidence from Fukushima and Chernobyl that impacts can extend far beyond 50–100 km from a nuclear facility.
- The Proponent must ensure that Lakeland Métis is involved in **developing emergency preparedness and response plans**, including culturally appropriate communication protocols and community-specific evacuation measures in the event of a nuclear incident.
- Lakeland Métis seeks to understand on-the-ground impacts through **co-designing monitoring programs** that include the deployment of community-based monitors with sufficient capacity and opportunities to engage in pre-construction field visits, participate in construction monitoring, and be involved in Indigenous post-construction monitoring. LMN are especially interested in monitoring radionuclide levels in water,



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soil, vegetation, fish, and wildlife throughout the life of the project and for a significant post-closure period.

- The Impact Assessment must address the **protection of Crown lands used by Lakeland Métis for cultural practices**, recognizing that these areas are not determined by proximity to our mailing address but by our historical and ongoing use of traditional territory.

Thank you for your attention to these matters, and we remain committed to constructive dialogue and collaboration moving forward.

Sincerely,

<Signature removed>

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