

Attachment 1: Woodland Cree First Nation Comments on Draft Tailored Impact Statement Guidelines for the Proposed Peace River Nuclear Power Plant Project, Dated June 09, 2025

Comment ID "WC1" etc.	Section	Section title	Comments	Recommendations
1	General		<p>Consistent with best practice and Canada's commitments to Indigenous peoples, it is Woodland Cree's position that regulatory and/or Impact Assessment of proposed projects should be initiated only after potentially impacted parties have been meaningfully engaged by the proponent. Engagement prior to the initiation of formal regulatory or IA processes allows impacted parties to be sufficiently informed to adequately participate in those processes. The importance of early engagement prior to formal regulatory or IA processes is particularly important for projects that have the potential to result in significant adverse and irreversible impacts to a community's rights and interests. A large nuclear reactor in close proximity to Indigenous communities and interests certainly meets that threshold.</p> <p>With the exception of preliminary contacts, the proponent has not yet engaged substantively with Woodland Cree on the proposed nuclear reactor. The Nation's knowledge of the project is therefore limited to the high-level information presented in the proponent's Initial Project Description (April 2025). In this context: a) Woodland Cree lacks the information necessary to provide informed feedback on the Draft Integrated Tailored Impact Statement Guidelines (Integrated Timelines); and b) the proposed project that is under review has not been designed to consider the input and interests of Woodland Cree. This represents a substantive deficiency in both the proposed project and the Impact Assessment process of the project.</p>	<p>Woodland Cree strongly recommends that the Impact Assessment process for the proposed project, including IAAC consultation on the Draft Integrated Tailored Impact Statement Guidelines, be deferred until the proponent has: a) consulted with First Nations on their Indigenous Engagement Plan; b) revised and finalized their Engagement Plan to reflect First Nations input; and c) completed a first round of meaningful Indigenous engagement. This approach is necessary to ensure First Nations have sufficient information to meaningfully contribute to the Impact Assessment process. We understand that under IAA 2019, any such request has to come from the Proponent; we urge the Proponent to exercise its right to call for a temporary suspension of the critical Phase 1: Planning Phase of the process, until the above-noted engagements and activities have been completed. Woodland Cree rejects any suggestion that we should hurry through this Phase 1 and move to the IS development Phase 2 without these critical foundations and relationships in place.</p>
2	General		<p>In addition to incorporating relevant CNSC requirements, it is Woodland Cree's understanding that the IAAC's generic guideline template was tailored to address additional project-specific considerations. The guidelines do not document or describe the modifications that were made to the generic template.</p>	<p>Woodland Cree recommends that the guidelines be modified to explicitly indicate any changes that were made to the IAAC's generic guidelines template and the rationale for the changes. In particular, Woodland Cree recommends that any changes made to address their interests be clearly documented.</p>

3	General		<p>The proposed project will induce the need to manage spent nuclear fuel and other high-level radioactive wastes in perpetuity. The Impact Assessment of the project should, therefore, verify that appropriate nuclear waste management facilities are readily available to receive and indefinitely manage such wastes. Woodland Cree's position is that the proposed project and the need to manage waste from the facility are inseparable and should be incorporated into the Impact Assessment. Assessing the nuclear reactor and radioactive waste management activities all the way to their ultimate disposal separately would constitute project splitting.</p> <p>The Initial Project Description (IPD, April 2025) makes reference to the permanent storage of spent nuclear fuel in a Deep Geological Repository (DGR) which is the responsibility of the Nuclear Waste Management Organization (NWMO). While the NWMO has selected a preferred site for the DGR near Ignace, Ontario, the facility has not been approved or constructed. Further, the IPD provides no information regarding whether waste from the Peace River Nuclear Power Project will be eligible for disposal in the DGR (if and when it becomes available). In addition, the draft Integrated Guidelines do not appear to include the assessment of impacts associated with long-term radioactive waste management.</p> <p>Consequently, the proposed project has not provided assurances that a permanent management solution for spent nuclear fuel will be available to the project. In addition, based on the draft Integrated Guidelines, the assessment will not evaluate the impacts of long-term radioactive waste management once the waste leaves the RSA.</p>	<p>Woodland Cree recommends that the IA guidelines be modified to:</p> <p>Require the proponent to verify that permanent (i.e., not temporary) nuclear waste management facilities will be available to manage all spent nuclear fuel and other high-level radioactive wastes that will be generated by the Peace River Nuclear Project;</p> <p>Require the assessment of impacts associated with the permanent management of spent nuclear fuel and other high-level radioactive wastes that will be generated by the proposed project.</p>
4	General		<p>The proposed project will induce the need to transport radioactive materials through the traditional territories of the Woodland Cree. It is, therefore, Woodland Cree's position that the proposed project and the need to transport radioactive materials in to and out of the facility are inseparable and should be incorporated into the Impact Assessment. Assessing the nuclear reactor and radioactive material transportation activities separately would constitute project splitting.</p> <p>The IPD provides limited information regarding the off-site transport of radioactive materials that will be brought into, generated by, and transported out of (primarily in waste form) the proposed project. In addition, the draft Integrated Guidelines do not appear to include the assessment of impacts associated with the off-site transportation of radioactive materials.</p> <p>Consequently, the proposed project and Impact assessment process will not address whether there are risks to the traditional lands of the Woodland Cree associated with the transportation of radioactive wastes that will be generated by the proposed project, or the bringing in of radiological materials to fuel the proposed project.</p>	<p>Woodland Cree recommends that the IA guidelines be modified to require the assessment of impacts associated with the off-site transportation of: a. nuclear fuel into the facility; and b. radioactive materials that will be generated by the proposed project, out of the facility.</p>

5	General		<p>The Integrated Guidelines refer to "baseline" conditions on multiple occasions throughout the document. However, using the term "baseline" conditions as opposed to "baseline and trend-over-time" conditions encourages the practice of proponents only profiling current conditions without providing the necessary historical context that is necessary to understand how those conditions have changed over time.</p>	<p>Woodland Cree recommends that all references to "baseline" conditions included throughout the Integrated Guidelines be revised to "baseline and trend-over-time" conditions.</p> <p>Additionally, the IAAC should also included in the Integrated Guidelines clear guidance requiring proponents to include appropriate temporal depth for all baseline and trend-over-time conditions profiles.</p>
6	General		<p>In Section 1.5, the draft Tailored Guidelines uses the term "review panel (p.8)" however, later in Section 1.5, the term "Integrated Review Panel (p. 8)" is used. In Section 2.1, the term "Integrated Review Panel (p. 9)" is used once again.</p>	<p>Woodland Cree recommends that the Integrated Guidelines be revised to use consistent terms to describe the review panel to avoid confusion later on in the assessment process.</p>
7	General		<p>Woodland Cree notes that, upon review of the draft Integrated Guidelines, there is a difference in how much guidance is provided for certain topics. For example, for topics related to health, social, and economic conditions, only five pages of guidance is provided. However, in other sections such as fish and fish habitat, there is significantly more guidance provided.</p> <p>Considering that historically, proponents have been less comfortable assessing effects on people, providing more detailed guidance, not less, is essential to improving the quality and relevance of Impact Assessments in these areas.</p>	<p>Woodland Cree recommends that more guidance is provided throughout Section 9 and Section 10. However, if the IAAC and the CNSC are not willing to expand the guidance provided, Woodland Cree recommends that a Technical Working Group, which includes representatives of WCFN, be established as soon as possible to develop more comprehensive guidance and direction for the proponent.</p>
8	General		<p>Throughout the draft Integrated Guidelines, the phrase "environmental, health, social, and economic conditions" is used consistently. Woodland Cree notes that this statement does not include reference to "culture" or "rights," despite their importance to WCFN.</p>	<p>Woodland Cree recommends that "cultural" and "rights" be explicitly added as distinct pathway types wherever this phrase appears in the Integrated Guidelines.</p>
9	1	Introduction	<p>The Integrated Guidelines indicate that they were prepared to include all the information necessary to make a decision in accordance with the IAA and to make a decision on whether to issue a Licence to Prepare Site (LTPS) in accordance with the NSCA (as administered by the CNSC). The LTPS requirements are limited to "Site Evaluation and Site Preparation for New Reactor Facilities" (CNSC REGDOC 1.1.1). Additional licences will be required for subsequent project phases to construct, operate and decommission the proposed nuclear reactor. It is Woodland Cree's understanding that the requirements for those additional phases have not been incorporated into the Integrated Guidelines. In this regard, it is unclear whether the CNSC's requirements for the construction, operation and decommissioning of the reactor will be evaluated by the current Impact Assessment. If only some portion of the operation is being considered, that is not in alignment with the IAA's requirement to assess all phases of the proposed Project before making a decision on whether it should be allowed to proceed and under what conditions.</p>	<p>Woodland Cree recommends that IAAC and the CNSC clarify how CNSC requirements associated with all operational phases of the nuclear reactor will be incorporated into the Impact Assessment process. This includes the entire life-cycle of the proposed project (e.g., construction, operation and decommissioning of the facility).</p>

10	1.1.1	Site Evaluation	<p>Text Reads: The site evaluation process overlaps substantially with the requirements of an impact assessment conducted under the IAA. The site evaluation and impact assessment determine, for the entire lifecycle of the project, whether:</p> <ul style="list-style-type: none"> - siting option choices were made to avoid or minimize environmental effects; - the proposed facility and site infrastructure designs to be established are adequate (including the exclusion zone boundary, where appropriate); - the proponent will ensure adequate provision for the protection of the environment, the health and safety of persons and maintaining national security - the effects are likely to be, to some extent, significant, and the extent to which they are significant, taking into consideration mitigation measures 	<p>Indigenous values should also be included in this bulleted list. The Woodland Cree recommends that the following statement be included: "the proponent will ensure adequate provision for the protection of Indigenous knowledge, land use, health, social and economic conditions, and Indigenous rights and interests"</p>
11	1.3	Gender Based Analysis Plus (GBA Plus)	<p>The draft Integrated Guidelines states: "Quantitative information, including equality, diversity and inclusion sensitive data, should be complemented by qualitative insights from studies or consultations, and other sources (p. 6)." However, it is Woodland Cree's understanding that qualitative insights from BOTH studies and consultations, and other sources, should be used to inform the development the Gender Based Analysis Plus (GBA Plus).</p>	<p>Woodland Cree recommends that the IAAC and the CNSC revise this statement to replace the term "or" with "and" to reflect that both studies and consultation are needed, given the size of this proposed Project. Additionally, more guidance should be provided by IAAC to ensure that proponent are aware that data collection efforts must engage marginalized sub-populations, including those of WCFN, in socially and culturally appropriate ways.</p>
12	1.3	Gender Based Analysis Plus (GBA Plus)	<p>Upon review of Section 1.3, Woodland Cree noted that no guidance is provided that requires the proponent to vet its Gender Based Analysis Plus (GBA Plus) methods with the IAAC and other integral parties to the impact assessment, including WCFN, prior to starting the Impact Statement. The Proponent should be directed to engage with WCFN prior to review their proposed GBA Plus methods to reduce the risk of them adopting a flawed GBA Plus approach in their Impact Statement that does not align with the expectation of the IAAC or WCFN.</p>	<p>Woodland Cree recommends that the IAAC include specific guidance in the Integrated Guidelines requiring the Proponent to vet its GBA Plus methods with the IAAC and other integral parties to the impact assessment, including WCFN, prior to starting the Impact Statement. Woodland Cree also supports setting up technical working groups, such as for Indigenous H,S and E, at the earliest possible point in the process, to help inform the Proponent during Phase 2 IS development. WCFN seeks to have its representatives on any such technical working group.</p>

13	1.4	Preparing Impact statement	<p>Bullet point reads: "respect the obligation of protecting personal information and adopt the established standards for the management of Indigenous data (e.g., the First Nations principles of Ownership, Control, Access and Possession or standards adopted by an Indigenous Nation and community) and disaggregated data from small or unique populations."</p>	<p>WCFN is unable to provide informed feedback on this point due to a lack of information and meaningful dialogue with the Proponent. This general statement may or may not meet Woodland Cree expectations for how information shared through this process will be protected, but still be considered in the assessment. The only way to clarify this is for the Proponent to meet with Woodland Cree and develop a custom Engagement Plan (separate from the custom Collaboration Agreement required between Woodland Cree, IAAC and CNSC), wherein the specific expectations and requirements of Woodland Cree will be enshrined in a bilateral legal document with Energy Alberta. The absence of such an agreement at this point in the process is another reason why Phase 1 needs to be put in abeyance until the foundations of the assessment process can be laid. The absence of such an agreement at this point in the process is another reason why Phase 1 needs to be put in abeyance until the foundations of the assessment process and relationship between WCFN and the Proponent can be laid.</p>
14	1.4	Preparing Impact statement	<p>In Section 1.4, the following is noted: "The proponent may present the information in the Impact Statement in the manner it deems most appropriate. IAAC and the CNSC recommend the Impact Statement follow a structure similar to the Integrated Guidelines in order to facilitate its review and participation in the process. To facilitate the review of the Impact Statement, the proponent must provide a table of concordance that indicates where each requirement of the Integrated Guidelines is addressed (p. 6)."</p> <p>While the Woodland Cree understands that the proponent is responsible for completing the Impact Statement, Woodland Cree insists that the IAAC, the CSNC, and other integral parties to the IA, like WCFN, must establish guardrails on how information is collected, how the guidance is interpreted and applied, and what constitutes sufficient evidence, analysis, and presentation within the Impact Statement."</p>	<p>Woodland Cree strongly recommends that the IAAC, the CNSC, and the Integrated Review Panel (as appropriate) establish clear guardrails for the proponent, namely in the form of detailed guidance and through formal "check-in" points throughout the IA process, with special emphasis on Phase 2 (IS development). These check-ins would give the opportunity for the proponent to present its plans and progress, and to receive feedback from the IAAC, the CNSC, and other integral parties to the IA, like WCFN. Adopting this approach would help prevent delays later in the process by ensuring that the proponent is aligned with the expectations of WCFN.</p>

15	1.4	Preparing Impact statement	<p>Section 1.4 reads: "The rationale for not including the information must also be provided in the Impact Statement (p. 6)."</p> <p>Woodland Cree wishes to note that waiting until the Impact Statement is submitted for the proponent to outline what requirements from the Tailored Impact Statement Guidelines are not included would be far too late in the IA process.</p>	<p>Woodland Cree recommends that if the proponent is seeking to eliminate a requirement from the Tailored Impact Statement Guidelines, this must be discussed and vetted by WCFN to determine whether this is acceptable or not. The TISGs should clearly outline the process for considering such changes.</p> <p>The same principle should apply to any proposed changes in the project scope, which is addressed in the following section.</p>
16	1.4	Preparing Impact statement	<p>Section 1.4 states: "IAAC and the CNSC are available to support the proponent during the preparation of the Impact Statement and may establish technical advisory groups, consisting of federal authorities and others, as appropriate"</p>	<p>For the record, Woodland Cree requests to participate in any such technical advisory groups.</p> <p>Additionally, Woodland Cree recommends that multiple technical advisory groups be established as soon as possible. As part of this, the technical advisory groups should be supported with adequate capacity funding to allow for meaningful Indigenous participation and engagement. This would allow the proponent to more effectively focus and tailor its valued component-specific assessments well in advance of preparing the Impact Statement.</p> <p>The Woodland Cree's recommended technical advisory group topics would include (but are not limited to): Peace River protection, radiological protection, waste management planning, Indigenous Knowledge integration, human health and wellness, accident and malfunction response, emergency planning, and the implementation of new CANDU MONARK technology at scale.</p>
17	1.4	Preparing Impact statement	<p>Section 1.4 includes the following statement: "The proponent should, in consultation with IAAC and the CNSC, consider submitting documents for review (e.g., proposed study plans, draft sections of the Impact Statement) prior to submitting the formal Impact Statement. Active engagement will support early identification and resolution of issues (p.7)."</p>	<p>This section should explicitly have Indigenous groups added as part of the consultation and review of documents submitted by the proponent.</p> <p>Additionally, this section should be revised to remove any advisory language (i.e., "should") and instead replace it with clear, mandatory statements that <u>require</u> the proponent to follow the outlined guidance.</p>
18	1.4	Preparing Impact statement	<p>The Woodland Cree think that there should be additional guidance provided to the proponent in this section to help address common challenges encountered during the Impact Statement and Impact Assessment phases.</p>	<p>Woodland Cree recommends that the following guidance is added to the Tailored Impact Statement Guidelines in Section 1.4: "Where the proponent's assessment involves assessing the effects on Indigenous peoples or on valued components that their rights are dependent on, and/or includes interpretation of Indigenous studies and engagement inputs, it is strongly recommended that the proponent provide Indigenous governing bodies with advance opportunities to review these materials prior to filing the Impact Statement."</p>

19	1.4	Preparing Impact statement	Section 1.4 notes that: "The proponent is expected to provide IAAC and the CNSC a work plan for the Impact Statement phase of the project, within three months of the Notice of Commencement (p. 7)." As currently drafted, it is not clear whether this work plan has already been provided by the proponent or whether it will be submitted by the proponent upon the receipt of the final Tailored Impact Statement Guidelines.	Woodland Cree recommends that this statement in the Tailored Impact Statement Guidelines be revised to provide additional clarity. Furthermore, the Tailored Impact Statement Guidelines should note that upon receipt of this work plan for the Impact Statement, the IAAC and the CNSC will distribute it to all potentially impacted Indigenous groups, and hold a workshop where potentially impacted Indigenous groups are given the opportunity to provide advice to the proponent on the adequacy of the work plan and its implementation.
20	1.4	Preparing Impact statement	Section 1.4 states that: "IAAC and the CNSC will conduct an initial verification review of the submitted Impact Statement to confirm that the document contains sufficient information to proceed to a technical review (p.7)."	Woodland Cree recommends that the IAAC and the CNSC also solicit inputs from potentially impacted Indigenous groups at this stage in the IA process as well.
21	1.5	Format and Accessibility	When discussing the format by which the information must be submitted in Section 1.5, Woodland Cree noted that there is no mention of the need for the proponent to provide any information in Cree.	Woodland Cree recommends that a statement be added at the end of Section 1.5 requiring the proponent to submit information in Nehiyawewin. For example, the text could state: "The proponent must engage with affected Indigenous governing bodies to determine what information, if any, should be provided in another language (e.g., Nehiyawewin)."
22	2.2	Qualifications of individuals preparing the Impact Statement	The IPD contains limited information regarding the technical capabilities of the proponent. In addition, the draft guidelines do not require the proponent to demonstrate that they have the requisite technical expertise to develop and operate a nuclear reactor. It is Woodland Cree's understanding that the proponent, Energy Alberta, was created exclusively for the purpose of developing the Peace River Nuclear Power Project. As a corporate entity, Energy Alberta has not designed, constructed, commissioned, operated or decommissioned any nuclear reactor projects. Further, with one exception (Dr. Kenneth Petrunik), Energy Alberta's leadership team has limited nuclear reactor experience.	Woodland Cree recommends that the Integrated Guidelines be modified to require the proponent to document their technical capabilities to develop and operate a nuclear reactor. In doing so, the proponent should describe both their corporate expertise (i.e., of Energy Alberta as a corporation) and any expertise held by their employees, contractors or agents. Additionally, the proponent must show the qualifications and experience of each assessor to conduct the assessment of each valued component, as well as append CVs for each of them to the Impact Statement. In addition to this, the term in the first sentence of this bullet should be changed to "have prepared the information, studies, and assessments."
23	2.2	Qualifications of individuals preparing the Impact Statement	Second bullet of the list provided in Section 2.2: "Demonstrate that qualified individuals have prepared the information or studies, as demonstrated by formal education training or certification, experience, or credibility or standing as knowledge holders. Where possible, the proponent should use experts who are members of a professional body or recognized association, or holders of Indigenous Knowledge (p. 10)." It is unclear to Woodland Cree why disclamatory language such as "where possible" is included in this section, as it creates a loophole that could allow the proponent to rely on individuals that do not have the appropriate qualifications or recognized expertise to be involved in the assessment process. This is not acceptable to Woodland Cree.	Woodland Cree recommends that the phrase "where possible" be removed from this bullet. Additionally, Woodland Cree recommends that the Agency identify that interpretation of Indigenous Knowledge and incorporation of it into the IS must be conducted by and/or with the Indigenous group itself, or verified by the Indigenous group as reasonably accurate and adequate in the IS if the Indigenous group declines to conduct the data collection and analysis, and that all persons involved in the interpretation of Indigenous Knowledge be identified in the IS and their qualifications for this sort of interpretation clearly identified.

24	2.2	Qualifications of individuals preparing the Impact Statement	<p>Text Reads: "characterizing all potential sources and types of scientific uncertainty, including their magnitude and any differences in the interpretation of scientific results (p. 10)."</p> <p>However, it is unclear to Woodland Cree what "differences in the interpretation of scientific results" refers to. Does this refer to differing views among members of the assessment or study team, findings from independent peer reviews, or feedback from other parties on draft materials?</p>	Woodland Cree request that this statement be revised to provide additional clarify as to how any differences in the interpretation of scientific results will be addressed in the assessment process.
25	2.2	Qualifications of individuals preparing the Impact Statement	<p>Revised comment: Section 2.2, particularly the last part of the Section that discusses the scientific integrity of the proponent's Impact Statement, does not include any mention or discussion of integrity and protocols linked to Indigenous Knowledge. Woodland Cree wishes to emphasize to the IAAC and the CNSC that Indigenous Knowledge should be treated as an equal to western science in the preparation of the Impact Statement.</p>	Woodland Cree strongly recommends that Section 2.2 be revised to include specific guidance on what IAAC and the CNSC expect from proponents to demonstrate the integrity of Indigenous Knowledge in the preparation and delivery of Impact Statements, similar to what has been done for science.
26	2.3	Management System for Site Evaluation	<p>Upon review of Section 2.3, Woodland Cree has noted that there is no mention of the proponent engaging with interested Indigenous governing bodies, like WCFN, to discuss the necessary requirements for the management system to be implemented for the management and control of all licensed activities for a LTPS. The lack of requirement for the proponent to engage with Indigenous groups is problematic</p>	Woodland Cree recommends that Section 2.3 be revised to include clear direction on when and how the proponent must engage with Indigenous groups to determine what the requirements should be for the management system.
27	3.1	Project Description	<p>Section 3.1 states that in the Impact Statement, the proponent must provide information about "the project, key project components and ancillary activities (both nuclear and non-nuclear), scheduling details, the timing of each phase of the project, the total lifespan of the project and other key features (p. 12)."</p> <p>Woodland Cree notes that there is no direction provided in Section 3.1 about what conditions are required for the facility to be considered for abandonment. This omission leaves uncertainty about the long-term responsibilities of the proponent in relation to the proposed project.</p>	<p>Woodland Cree recommends that Section 3.1 be revised to clarify for the proponent that the abandonment of the facility will not be considered until closure and reclamation activities have met the land condition expectations of regulators and other integral parties, including Indigenous groups like WCFN.</p> <p>As part of this, Woodland Cree recommends that it be explicitly stated in Section 3.1 that the assessment of potential effects must extend to this future point in time.</p>
28	3.1	Project Description	<p>Section 3.1 includes a list of the information that the proponent must provide in the Impact Statement about the proposed Project, such as key project components, the purpose of the facility, and the total facility's capacity in Megawatts thermal (MWth) and Megawatts electric (MWe). However, there is no requirement for the proponent to include any information about changes over time in capacity (including on an annualized basis and during different stages of the Project), and what proportion of total provincial grid power the facility is projected to provide on a year-by-year basis.</p>	Woodland Cree recommends that Section 3.1 be revised to require the proponent to provide the necessary information flagged in the comment (i.e., changes in facility capacity over time and projected percentage contribution of the facility to the provincial grid).

29	3.1	Project Description	<p>Section 3.1 includes the following statement: "The proponent should clearly itemize all high-level activities proposed to be conducted under the LTPS. An application considering several technologies should clearly identify those site activities proposed to be undertaken under a LTPS that are not affected by the technology choice, as well as those that are (p. 12)."</p> <p>As currently worded, there is insufficient guidance provided on what the IAAC and the CNSC expect from the proponent when they are presenting and assessing multiple scenarios, such as alternative technologies or potential plant locations, in the Impact Statement. Additionally, it is unclear to Woodland Cree if these multiple scenarios would be carried forward into the Impact Statement.</p>	Woodland Cree recommends that Section 3.1 be revised to provide clear direction to proponents on how multiple scenarios should be considered in the Impact Statement. This direction must also include the requirement for the proponent to engage with potentially impacted Indigenous groups, including WCFN, on each scenario.
30	3.2	Project location	Text in Section 3.2 reads: "proposed conventional and radiological waste transfer and storage areas (p. 13)."	Woodland Cree recommends adding "details of radiological waste management" as part of this requirement.
31	3.2; see also 3.4	Project location	<p>Section 3.2 includes the following requirement: "layouts of all site roads and proposed transmission corridors (p. 13)."</p> <p>Woodland Cree notes that the wording of this statement only requires the proponent to include information about the new, proposed infrastructure. For example, there is no mention of the proponent having to identify any existing transmission or transportation corridors that may be upgraded or repurposed as part of the Project.</p> <p>In addition, upon review of the list of Project activities as part of the Operations Phase that should be described in the Impact Statement (Section 3.4, p. 17), Woodland Cree notes that there is no requirement for the proponent to identify any existing transmission corridors that may be upgraded or repurposed as part of the Project. Rather, it only requires that the proponent include information about the new, proposed infrastructure</p>	Woodland Cree recommends that Sections 3.2 and 3.4 be revised to clarify that the proponent must information about any existing and proposed infrastructure necessary to support the project, including discussion of any necessary upgrades.
32	3.2	Project location	<p>Text Reads: services and infrastructure and current land and aquatic uses in the area, including:</p> <ul style="list-style-type: none"> <input type="checkbox"/> transportation corridors (e.g., roads, rail lines, shipping lanes, airports) <input type="checkbox"/> municipalities and administrative regions, <input type="checkbox"/> resource development projects already underway in the study area (e.g., mines and forestry operations), and <input type="checkbox"/> local businesses and industries such as fisheries and outfitters, and any other relevant uses; 	"Other relevant uses" should be clarified to explicitly include (where identified by Indigenous groups and this information approved by them for use in the IS) current land and water uses by Indigenous people, including hunting, trapping, fishing, gathering, engaging in spiritual practices. The proponent should be required to identify these uses on the landscape in this project location section.

33	3.2	Project location	<p>Upon review of the list of information that the proponent needs to provide for both sites in their Impact Statement, it is noted that it is required that "location, description and maps of Indigenous traditional territories and consultation areas, Treaty lands, Title lands, Reserve lands, Indigenous harvesting regions (with permission of Indigenous Nations or communities), Métis settlements (p. 14)."</p>	<p>Woodland Cree recommends that this bullet be revised to explicitly include the identification of any preferred harvesting areas and any relevant Indigenous land use plans. As part of this, it should be noted in the bullet that the proponent should map where these areas and plans intersect with, or are in, close proximity to the project's Regional Study Area (RSA).</p> <p>Additionally, Woodland Cree recommends that the Tailored Impact Statement Guidelines provide guidance to the proponent on how they should engage with impacted Indigenous groups to verify this information prior to filing the Impact Statement.</p>
34	3.2	Project location	<p>Text Reads: "culturally important features of the landscape."</p>	<p>Woodland Cree recommends adding "and locations identified by potentially impacted Indigenous groups as sensitive or culturally important".</p> <p>Additionally, Woodland Cree recommends that the Tailored Impact Statement Guidelines provide guidance to the proponent on how they should engage with potentially impacted Indigenous groups like WCFN to verify this information prior to filing the Impact Statement.</p>
35	3.3	Regulatory framework and the role of government	<p>Section 3.3 includes the following: "government policies, resource management plans, planning or study initiatives relevant to the project or the integrated assessment and their implications, including relevant regional studies, regional assessments and strategic assessments (p. 14)."</p>	<p>Woodland Cree requests that this statement be revised to specifically require that the Proponent provide evidence that it has engaged with potentially impacted Indigenous groups, including WCFN, to identify relevant Indigenous policies, resource management plans, assessments, and initiatives that will be considered in the impact assessment.</p>
36	3.3	Regulatory framework and the role of government	<p>Text Reads: "any relevant land use plans, land zoning, or community plans;"</p>	<p>Woodland Cree recommends adding "including any Indigenous land use and development plans". This will reinforce that Indigenous land use plans, including those of WCFN, are an important part of the regulatory framework overlapping and surrounding the project area.</p> <p>As part of this, it should be noted in the bullet that the proponent should map where these areas and plans intersect with, or are in, close proximity to the project's Regional Study Area (RSA)</p>
37	3.4	Project components and activities	<p>As part of the requirement for the proponent to describe the nuclear facilities-related activities and components, the proponent is required to describe the "waste management strategies for low, intermediate, and high-level radioactive waste (e.g., spent fuel) for the facility's lifecycle, etc.) (p. 15)."</p> <p>However, Woodland Cree notes that more information about the waste management of the facility is required to be able to understand the adequacy of the proposed waste management strategies.</p>	<p>Woodland Cree recommends that Section 3.4 be revised to require the proponent to provide detailed information on:</p> <ol style="list-style-type: none"> 1. Estimated waste amounts by type; 2. On-site storage plans and locations; 3. Consolidation or other alteration requirements for any waste prior to it being suitable for disposal and where this is proposed to occur; 4. Transportation plans and transportation routes; 5. Proposed ultimate disposal locations and methods; and 6. Level of certainty that disposal facilities will be available for permanent disposal.

38	3.4	Project components and activities	Upon review of the list of Project components that should be described in the Impact Statement (pp. 15 to 16), Woodland Cree notes that there is no requirement for the proponent to describe any on or off-site housing arrangements. The housing arrangements for construction and operations workers for this very large project will be a critical part of the project, especially during the construction phase, and as such must be described in the Impact Statement.	Woodland Cree recommends that the Guidelines be revised to require the proponent to describe any planned workforce housing arrangements, including: 1. On-site and off-site housing locations; 2. Type and scale of housing accommodations; 3. Management and oversight systems for employees; and 4. Methods for the transportation of workers to and from the site.
39	3.4	Project components and activities	Upon review of the list of Project activities as part of the Site Preparation Phase that should be described in the Impact Statement (p. 16), Woodland Cree notes that there is no reference to the proponent needing to describe any water treatment methods or facilities before the treated water is released.	Woodland Cree recommends that the Project Activities list for the Site Preparation Phase be revised to include a clear requirement for the proponent to describe all water treatment processes and infrastructure that will be used during this project phase
40	3.4	Project components and activities	Included in the list of Project activities during the Decommissioning Phase that should be described in the Impact Statement, is "other restoration and remediation activities of the site to a condition suitable for alternative land use (p. 17)." The use of the phrase "alternative land use" is too vague for Woodland Cree. The proponent must provide information about the state in which they plan to leave the site and confirm whether this proposed end state is acceptable to affected Indigenous groups.	Woodland Cree recommends that a requirement be added for the proponent to develop and submit a Preliminary Land Use and End-Stage Plan as part of the Impact Statement. This plan should be developed in consultation with, and vetted by, Indigenous groups.
41	3.4.1	Incidental Activities	Section 3.4.1 states that all aspects of a designated project, as well as any physical activity incidental to those listed activities should be considered during the assessment process. Text reads: "IAAC will continue to analyze which activities may be incidental to the project based on the Proponent's Initial Project Description, Response to the Summary of Issues, as well as information provided in the public comment period on these draft Integrated Guidelines. The result of this analysis will be reflected in the final version of these Integrated Guidelines (p. 18)." Woodland Cree requests that a preliminary list of the known or likely incidental activities should be included, based on the IAAC and CNSC's review. For example, incidental activities may include off-site worker accommodations, the construction or upgrading of transmission infrastructure required to distribute power to the grid, and other regionally connected infrastructure that is essential for the project to function.	Woodland Cree recommends that Section 3.4.1 be revised to include a preliminary, non-exclusive list of incidental activities that are expected to be considered part of the project.
42	3.5	Workforce requirements	Section 3.5 outlines the necessary information that the proponent must include in the Impact Statement related to workforce requirements, including "anticipated workforce region of origin (i.e., local, regional, out-of-province or international employees) (p.18)." Woodland Cree notes that simply requiring the proponent to provide information on the anticipated workforce is not sufficient. The proponent must also include evidence supporting their estimation of anticipated workforce by region of origin. Additionally, there is no requirement in this list for the proponent to provide anticipated proportion of the workforce by local Indigenous, other Indigenous, and non-Indigenous origin. Without this information, the confidence that can be held in the proponent's estimations cannot be determined.	Woodland Cree recommends that this bullet be revised to state: "anticipated workforce region of origin (i.e., local, regional, out-of-province or international employees), with evidence provided to support these projections." In addition, a separate bullet should be added below this one that requires the proponent to specify the anticipated proportion of the workforce by local Indigenous, other Indigenous, and non-Indigenous origin, with evidence provided to support these projections.

43	3.5	Workforce requirements	<p>Section 3.5 outlines the necessary information that the proponent must include in the Impact Statement related to workforce requirements, including "investment in training opportunities (p.18)."</p> <p>Woodland Cree notes that this requirement does not require the proponent to provide any details about the degree of investment that they will commit to, nor identify any training opportunities that the proponent is committed to supporting.</p>	<p>Woodland Cree recommends that this bullet be revised to require the proponent to provide specific details about the following:</p> <ol style="list-style-type: none"> 1. The types of training programs to be offered; 2. The timing of investment in training opportunities (e.g., pre-construction, during operations); 3. The target groups (e.g., local Indigenous communities, youth, etc); 4. The amount of investment the proponent commits to; and 5. The types of positions the training is intended to support.
44	4.1	Purpose of the project	<p>Text Reads: "The Impact Statement must outline what is to be achieved by carrying out the project. The Impact Statement should broadly classify the project (e.g., new nuclear energy) and indicate the target market (e.g., international, domestic, local), where applicable. The "purpose of" statement should include any objectives the proponent has in carrying out the project, and the proponent is encouraged to consider the perspectives of participants (i.e., Indigenous Nations and communities, public, governments) in establishing its objectives (p. 19)."</p>	<p>Woodland Cree recommends the word "encouraged" be replaced with the word "required", in order to align with the many places throughout the draft TISG that require the proponent to engage with, consider, integrate and discuss perspectives of Indigenous groups.</p> <p>Additionally, Woodland Cree recommends that the term "where applicable" be removed. As stated elsewhere in our comments, language like "should" or "where applicable" should be removed and replaced with clear, directive statements that <u>require</u> the proponent to follow the outlined guidance. If the Crown is concerned that Indigenous groups will not engage, some adjustment to the language to reflect that the proponent is "required to seek out and where provided, integrate the perspectives of Indigenous Nations and communities re: objectives, into its IS", is a reasonable compromise.</p>
45	4.1	Purpose of the project	<p>Section 4.1 includes: "The Impact Statement must outline what is to be achieved by carrying out the project. The Impact Statement should broadly classify the project (e.g., new nuclear energy) and indicate the target market (e.g., international, domestic, local), where applicable. The "purpose of" statement should include any objectives the proponent has in carrying out the project, and the proponent is encouraged to consider the perspectives of participants (i.e., Indigenous Nations and communities, public, governments) in establishing its objectives (p. 19)."</p> <p>However, encouraging the proponent to consider the perspectives of participants (i.e., Indigenous Nations and communities, public, governments) in establishing its objectives is not sufficient. There must be a clear <u>requirement</u> for the proponent to do so.</p>	<p>Woodland Cree recommends that this language be strengthened to require that: "The proponent must provide evidence that it has engaged with participants (i.e., Indigenous Nations and communities, public, governments) about their objectives in the Project-affected area and must describe how the Project may promote or negatively impact those objectives."</p>
46	4.2	Need for the project	<p>Section 4.2 states that the Impact Statement must include "include supporting information that demonstrates the need for a project (p. 19)."</p> <p>If the proponent has to identify the need for a project, they must also assess the degree to which the need exists (e.g., additional power demand for specific industrial, residential, or commercial sectors). However, this is not currently required as per the list provided in Section 4.2.</p>	<p>Woodland Cree recommends that Section 4.2 be revised to require that the proponent consider the degree that the need exists for the project, and a quantitative and qualitative justification of the degree that the need exists.</p>

47	4.3	Alternatives to the project	<p>Section 4.3 states: "An assessment of energy mandates established through federal and provincial legislation or policy may not be within the scope of the integrated assessment. As a result, the alternatives to the project presented by the proponent need not include alternatives that are inconsistent with federally mandated initiatives or a province's formal plans or directives. However, the proponent should explain where this rationale has been applied to exclude consideration of possible alternatives to the project (pp. 19 to 20)."</p> <p>Even though mandates established under federal or provincial legislation are not subject to reconsideration through the Impact Assessment process, Woodland Cree remains concerned that the language used throughout Section 4.3 does not require the proponent to include all reasonable and viable alternatives to the project.</p>	<p>Woodland Cree recommends that Section 4.3 be revised to require the proponent to clearly identify the anticipated energy demand, beyond existing sources, that are within the project's intended market over its lifetime. Additionally, the proponent should provide a comparative analysis of nuclear energy against other available energy production methods in the local and regional context, based on key technical, environmental, economic, and social indicators.</p>
48	4.4	Alternative means of carrying out the project	<p>As part of the requirements for the 'Alternative means of carrying out the project,' it is written in the draft Integrated Guidelines that the Impact Statement must describe "the particularities for each alternative mean and their potential adverse and positive environmental, health, social and economic effects, and their potential impacts on Indigenous Peoples and their rights, as identified by Indigenous Nations and communities (p. 20)."</p> <p>However, throughout the rest of Section 4.4, there is no mention any requirement or expectation for the proponent to engage directly with Indigenous Nations in the assessment of alternative means. It is unclear how the proponent can determine which alternative means is preferred by Indigenous groups without any engagement throughout the alternative means assessment process.</p>	<p>Woodland Cree recommends that Section 4.4 be revised to outline a clear multi-party engagement process that the proponent must follow while undertaking engaging with Indigenous groups when doing the alternative means assessment. As part of this process, the proponent must be required to engage with potentially impacted Indigenous groups, including WCFN, in the identification and assessment of all alternative means.</p> <p>Additionally, Section 4.4 must be revised to require that the proponent provide details about the potential benefits and risks of the different alternative means. This analysis should include both qualitative and quantitative comparisons across a predetermined set of criteria and must also be applied to all the identified alternative means, not just the preferred alternative.</p>
49	4.4	Alternative means of carrying out the project	<p>The proponent proposes to construct, operate and decommission a large-scale industrial project with a total project duration in excess of 100 years. The proposed facility is located in the heart of the traditional lands of the Woodland Cree which continue to be actively used by community members. In addition to being a major industrial development, the proposed project is a nuclear reactor with the potential to cause significant real and perceived impacts that could long-term to permanently affect the rights and interests of the Woodland Cree.</p> <p>Despite this context, the IPD provides limited information regarding why the traditional lands of the Woodland Cree were selected as the preferred location for a nuclear reactor. No information is provided indicating that alternative sites were evaluated in detail and that the proposed general location is demonstrably superior. Notably, the location was selected by the proponent without performing extensive, meaningful engagement with the Woodland Cree.</p> <p>In addition to the deficiencies with the IPD noted above, the draft Integrated Guidelines do not require that the proponent conduct an in-depth evaluation of alternative locations for the proposed facility. Instead, the Integrated Guidelines simply require the proponent to "provide a high-level overview of alternative sites considered prior to selecting the proposed site".</p> <p>Given the importance of project siting to the potential impacts of a facility, including impacts to the rights and interests of Woodland Cree, failure to consider alternative locations represents a substantive deficiency in the draft Integrated Guidelines.</p>	<p>Woodland Cree recommends that the Integrated Guidelines be modified to require an in-depth multiple accounts assessment of alternative locations for the nuclear reactor. The assessment should systematically demonstrate that any location selected for the reactor is demonstrably superior across a variety of criteria, considered in collaboration with potentially affected Indigenous groups, including WCFN.</p>

50	4.4	Alternative means of carrying out the project	Section 4.4 requires the proponent to address key project elements in the alternative means analysis, including "nuclear facilities-related activities/components (p. 21)." Woodland Cree notes that there are key details of the nuclear facility related-activities and components that must be identified in the alternatives assessment, and have not been included in this list.	Woodland Cree recommends that the following new bullets be added under "nuclear facilities-related activities/components": 1. Reactor design (e.g., new vs. existing CANDU technology); and 2. Number of reactors proposed.
51	4.4	Alternative means of carrying out the project	Section 4.4 requires the proponent to address key project elements in the alternative means analysis, including "water and wastewater management" and "waste management strategies (p. 21)." Woodland Cree notes that there are key details related to these project components that must be identified in the alternatives assessment, not included in this list provided in the draft Tailored Guidelines.	Woodland Cree recommends that the following new bullets be added under "water and wastewater management": 1. Sources of water required for the alternative; and 2. Approaches to water conservation and reuse aimed at reducing overall water intake requirements. Woodland Cree recommends that the following bullet be added under "waste management strategies": 1. Strategies and proposed locations for the storage and disposal of waste.
52	6	Description of Engagement with Indigenous Nations and Communities	Text Reads: "For the purposes of this integrated assessment, the term Indigenous rights and interests will be used throughout these Integrated Guidelines. The term Indigenous rights and interests includes the following requirements from the IAA:"	The section should include provisions for allowing adequate time and funding for Indigenous groups, like WCFN, to undertake their own requested studies and assessments as required to fully consider impacts to Indigenous rights and culture. The proponent should also be required to show that they made reasonable efforts to properly fund engagement activities and to show how the Proponent supported requests by Indigenous groups for Indigenous-led studies.
53	6	Description of Engagement with Indigenous Nations and Communities	Section 6 reads: "The project should be designed to minimize its negative effects, and to maximize its positive impact on Indigenous Peoples and their rights (pp. 23 to 24)." However, the use of the phrase "should be designed" does not provide sufficient assurances to Woodland Cree that the proponent will demonstrate how this objective has been met.	Woodland Cree recommends that this sentence be revised to read as follows: "The Impact Statement is required to present detailed evidence, that has been vetted by potentially impacted Indigenous groups, that demonstrates how the project has been designed to minimize its negative effects and maximize its positive impacts on their rights and interests."

54	6	Description of Engagement with Indigenous Nations and Communities	<p>Section 6 reads: "The assessment process will be conducted in a manner consistent with the Indigenous Engagement and Partnership Plan (IEPP) (p. 24)." However, this section lacks guidance that would be relevant for the proponent. Firstly, there is no guidance provided by the IAAC or the CNSC about how the proponent is expected to develop an Indigenous Engagement and Partnership Plan.</p> <p>Additionally, the current wording of this phrase does not provide sufficient assurance to Woodland Cree that the proponent will develop and implement its Indigenous Engagement and Partnership Plan early in the assessment process. It is Woodland Cree's expectation that this plan be developed in collaboration with WCFN and shared before submission of the Impact Statement. To date, Woodland Cree has not received a draft version of this Plan.</p>	<p>Woodland Cree recommends this phrase in Section 6 be expanded upon to provide more guidance to proponents about the Indigenous Engagement and Partnership Plan. Specifically, it must be required in the Tailored Impact Statement Guidelines that:</p> <ol style="list-style-type: none"> 1. The proponent develop and share its Indigenous Engagement and Partnership Plan early on in the assessment process, ideally well before the proponent submits the Impact Statement. 2. The proponent identify in the Indigenous Engagement and Partnership Plan the engagement approaches that they will follow, established in collaboration with Indigenous groups, and demonstrate how these were followed in the Impact Statement. <p>In addition to this, the IAAC and the CNSC must include a statement in the Tailored Impact Statement Guidelines about how Indigenous groups have their own protocols for engagement, and that these must be respected and integrated into the proponent's approach.</p>
55	6	Description of Engagement with Indigenous Nations and Communities	<p>The Integrated Guidelines state that IAAC collaborated with the CNSC to ensure that the Impact Assessment will reflect relevant requirements of the IAAC and the CNSC. The guidelines do not, however, clarify how IAAC and CNSC will collaborate on decision-making regarding the Impact Assessment.</p>	<p>Woodland Cree recommends that the guidelines be modified to include a description of the roles and responsibilities of the IAAC, CNSC and any other parties that will have decision-making authority related to the proposed project. The description should explicitly state the respective roles and responsibilities of each party and provide a process flow chart documenting the decision-making process. If there is another document that accurately depicts these roles and responsibilities please make reference to it in the guidelines. If no such document currently exists, it is critical to this process that it be developed ASAP. Woodland Cree also recommends that a statement should be made in the TISGs that "Where government-to-government Collaboration Agreements are developed during the course of this IA, they will supercede requirements of the IEPP, in the relations between the parties to the Collaboration Agreement.</p>
56	6	Description of Engagement with Indigenous Nations and Communities	<p>Table 1. Guidance Documents Required for Indigenous Consultation and Engagement</p>	<p>The Agency and Commission need to include a disclaimer that where Indigenous requirements differ from those identified in IAAC or CNSC guidance, those individual Indigenous Nation requirements will be identified and demonstrably adhered to. In the hierarchy of what engagement protocols to adhere to, it should be that of individual Indigenous groups on top, with IAAC and CNSC as a backstop, not the default.</p>

57	6	Description of Engagement with Indigenous Nations and Communities	<p>The TISG requires that the Proponent "share information and collaborate with Indigenous Nations and communities to contribute to the development and validation of conclusions and assessment findings related to potential impacts and pathways of effects to Indigenous Peoples and their rights and interests. The results of any engagement with each Indigenous Nation and community must be presented in the Impact Statement, and, as best as possible, convey the perspective of the Indigenous Nations and communities being engaged (p. 25)."</p> <p>The text must require that the proponent undertake this engagement early in the assessment process, and prior to the submission of the Impact Statement.</p>	<p>Woodland Cree requests that the IAAC and the CSNC add in a statement requiring that the proponent engage with Indigenous groups early in the process prior to filing the Impact Statement.</p> <p>Additionally, further clarity must be provided to explain what is meant by "convey the perspective of the Indigenous Nations and communities being engaged." For example, the following statement could be added: "For example, where an Indigenous group seeks an opportunity to be deeply involved in, review the results of in advance of filing of the Impact Statement, or to provide their own perspective on a VC or right-specific assessment to be integrated into the Impact Statement, the proponent will make all reasonable efforts to accommodate these requests, again in alignment with the depth of DTCA applicable to the Indigenous group in question in relation to the Project".</p>
58	6	Description of Engagement with Indigenous Nations and Communities	<p>The TISG requires that the Proponent "use consistent terminology for the valued components as identified by the Indigenous Nations and communities (p. 26)."</p> <p>This wording could be interpreted to mean that all valued components identified by Indigenous Nations must be integrated into the Impact Statement. If that is the case, then no changes would be required. However, if this is not the case, Woodland Cree requests further consultation with Canada on this issue.</p>	Woodland Cree requests additional clarification on this topic.
59	6	Description of Engagement with Indigenous Nations and Communities	<p>Throughout Section 6, there are multiple references to the participation of Indigenous Nations and communities throughout the assessment process.</p> <p>For example, in one section, it is written that the proponent must "provide occasions for Indigenous Nations and communities to review and provide comments on information prior to submission of the Impact Statement, and incorporate the comments (p. 26)." In a different section, it is noted that the proponent should "support the participation of Indigenous Nations and communities in the completion of the Impact Statement, which could include funding studies conducted by potentially affected Indigenous Nations and communities who will have demonstrated interest in this regard (p. 26)."</p>	<p>Woodland Cree recommends that all references to Indigenous participation throughout Section 6 be revised to include the phrase: "including reasonable timelines and adequate funding to support meaningful participation."</p> <p>Additionally, Woodland Cree recommends that the Tailored Impact Statement Guidelines be expanded to require the proponent to consider Nation-specific needs, as identified by Indigenous groups, when developing their engagement plan.</p>
60	6	Description of Engagement with Indigenous Nations and Communities	This section outlines the parameters around the proponent's obligation to consult with Indigenous groups, consider their knowledge, and report engagement activities. This section does not include adequate provisions respecting studies carried out by Indigenous groups that may inform the IS.	The section should include provisions for allowing adequate time and funding for Indigenous groups to undertake their own requested studies and assessments as required to fully consider impacts to Indigenous rights and culture. The proponent should also be required to show that they made reasonable efforts to properly fund engagement activities and to show how the Proponent supported requests by Indigenous groups for Indigenous-led studies.
61	6	Description of Engagement with Indigenous Nations and Communities	This section identifies the importance of indigenous groups having the opportunity to review sections of Impact Statement prior to submission. Indigenous groups need to be provided meaningful opportunities to review draft sections of the Impact Statement prior to them being filed and to seek to resolve any disagreements before sections are filed. Greater clarity on expectations should be provided for this important topic.	Woodland Cree recommend the text be revised to: "Indigenous groups will have opportunity to review and verify draft sections of the IS where they have provided IK and local knowledge and/or that are relevant to their rights and interest prior to them being filed" .

62	6.1	Indigenous Knowledge Considerations	<p>In Section 6.1, it is written that "Indigenous Knowledge should be conveyed in a culturally appropriate manner which captures the context in which it was provided (p. 27)." While Woodland Cree supports the inclusion of this phrase in the draft Integrated Guidelines, more guidance must be provided to the proponent.</p>	<p>Woodland Cree recommends that the sentence be revised to read: "Indigenous Knowledge should be conveyed in a culturally appropriate manner which captures the context in which it was provided, and it should not be reinterpreted by persons who do not hold the Indigenous Knowledge without proper verification measures in place to protect its integrity and meaning."</p> <p>Additionally, the following requirement should be added in Section 6.1: "The Impact Statement must include evidence that the proponent engaged Indigenous Nations and communities on the utilization and interpretation of Indigenous Knowledge, including a summary of all inputs and concerns raised, and a description of how the proponent responded to and addressed those concerns."</p>
63	6.1	Indigenous Knowledge Considerations	<p>In Section 6.1, it states that, "The Impact Statement for all sections must:</p> <ul style="list-style-type: none"> - reflect that community-specific engagement protocols and procedures around Indigenous Knowledge in assessment processes are understood, respected and implemented; - indicate where input from Indigenous Nations and communities, including Indigenous Knowledge, has been incorporated and how it was considered. Information should be specific to the individual Indigenous Nation(s) and communities involved in the assessment and describe contextual information about the members within an Indigenous Nation and community (e.g., women, men, Two-Spirit peoples, Elders and youth); and - indicate where Indigenous Knowledge that was provided was not included in the assessment and provide a rationale. Where findings differ between Indigenous Knowledge and scientific or technical studies, the proponent should clearly present how both were considered in the Impact Statement (p. 27)." 	<p>Woodland Cree recommends that the last bullet be revised to read as follows: "...should clearly present both sets of findings, and where the Proponent chooses one set of findings over the other, both a defensible rationale for that decision and evidence that Indigenous peoples were consulted prior to the adoption must be provided".</p>
64	6.2	Record of Engagement	<p>Trust is a fundamental underpinning of any efforts to collaborate and engage in good faith. Woodland Cree to date has been minimally engaged by the proponent and its leadership team. Consequently, the Nation lacks the first-hand experience necessary to confirm that a relationship of trust can be established for the proposed project. In lieu of such experience, Woodland Cree has reviewed publicly available documentation (including the IPD) to identify evidence that the proponent has a track record of effective and respectful collaboration with Indigenous peoples. The review identified limited information describing the proponent's prior work in this regard. It is, therefore, Woodland Cree's position that additional evidence describing the proponent's track record of Indigenous collaboration is necessary.</p>	<p>Woodland Cree recommends that the Integrated Guidelines be modified to require the proponent to document their track record of effective and respectful collaboration with Indigenous peoples. In doing so, the proponent should describe both their corporate track record (i.e., of Energy Alberta as a corporation) and the track record of their employees, contractors or agents.</p>

65	6.2	Record of Engagement	Section 6.2 includes the following text: "a demonstration that the capacity needs of Indigenous Nations and communities were taken into account, including a description of how they were taken into account, and that timelines were adequately communicated and flexible enough to ensure Indigenous Nations and communities had the ability to review and gain understanding of, and contribute to, information in the Impact Statement (p. 29)."	Update Section 6.2 to: 1. Include a new requirement for the proponent to describe the provision of capacity funding (timing, scope, and Indigenous verification). 2. Revise the final bullet to include a requirement that requests for more time from Indigenous Nations be acknowledged and addressed, or explained where not accommodated.
66	6.4	Collaboration with Indigenous Peoples following the submission of the Impact Statement	In Section 6.4, the following phrase is included: "how Indigenous Knowledge and expertise would be considered (p. 30)." From this phrase, it is not clear in what context or process this consideration is meant to occur.	Woodland Cree requests that it be clarified how, where, and for what purpose Indigenous Knowledge and expertise will be considered, in the context of the text in question.
67	7.1	Uncertainty and Bias	Section 7.1 outlines how the proponent must describe the major sources of uncertainty in the Impact Statement, including: - "limitations on data accuracy, precision, completeness and reliability, - environmental variability, including spatiotemporal variability, - extrapolations from other contexts (e.g., baseline conditions are extrapolated from other locations, time periods, populations or communities), - extrapolations from proxy measures or indicators to VCs themselves, - model limitations arising from incomplete or imperfect knowledge of the structure or function of the system being modelled (p. 31)."	In addition to the listed categories, Woodland Cree recommends that the following additional sources of uncertainty be explicitly identified and addressed in the Impact Statement: 1. Gaps in knowledge due to limited to no information from either science or Indigenous Knowledge; and 2. Contradictory data sources (e.g., findings that differ from those come to by the proponent).
68	7.2	Baseline Methodology	Text Reads: describe the baseline for the environmental, health, social and economic conditions related to the project and the interrelations and interactions among them. Meaningful, two-way dialogue with Indigenous Nations and communities and local communities should support the description of how environmental, health, social, and economic conditions are interrelated;	Traditional areas and uses should also be included in this wording; i.e., "...economic conditions and traditional areas and uses for Indigenous Nations and communities are interrelated".
69	7.3	Selection of valued components	Section 7.3 states that: "The Integrated Guidelines, in sections 8, 9, and 10, provide information requirements organized in categories that may be considered as VCs, or may be considered as intermediate components to inform the assessment of VCs, depending on the project (p. 34)."	Woodland Cree recommends that IAAC and CNSC remove this concept of Intermediate Components from the Guidelines. All VCs are VCs.
70	7.3	Selection of valued components	Upon review of Table 2: Valued Components to include in the Impact Statement (pp. 34 to 37), Woodland Cree has noted several gaps, such as: 1. There is no discussion of terrestrial harvesting and gathering, nor of travel, including both terrestrial and aquatic navigation; 2. There is no consideration of alienation and loss of use; and 3. There is no mention of mental health impacts or related physical health effects stemming from fear and stigma associated with nuclear projects.	Woodland Cree recommends that Table 2 be revised to address and fully reflect all the identified gaps, including terrestrial harvesting and gathering, travel (both terrestrial and aquatic navigation), alienation and loss of use, as well as mental health impacts and related physical health effects associated with fear and stigma from nuclear projects.

71	7.4.1	Spatial boundaries	Text Reads: □ information received from Indigenous Nations and communities.	Indigenous Nations and communities will likely be completing their own studies and assessments. This suggests the need for additional language. Recommended language is "...and communities, including incorporation of information from Indigenous studies completed, and a rationale for why any spatial boundaries adopted by Indigenous Nations/communities were not adopted by the proponent."
72	7.4.2	Temporal Boundaries	This section identifies some of the factors to consider when developing temporal boundaries but does not give specific guidance on either how far in the past to go to set a baseline and assess change over time, or how far in the future an assessment must go to capture all project effects.	Additional guidance is required both for going back in time and forward in time. At minimum: 1. All VCs should identify a defensible point in time in the past for consideration of baseline and trend-over-time conditions to be considered, and input sought from parties on when that time period would be; and 2. The proponent is required to set its temporal boundary for consideration of project-specific and cumulative effects in the Project and Planned Development Case to the point in time when no measurable effects from the Project are likely to occur. This temporal scope may exceed the "Project Life" in cases where Project effects may continue beyond closure and reclamation.
73	7.5	Effects assessment methodology	Text Reads: describe any residual effects of the project taking into account interactions between residual effects of the project and those of past, existing and reasonably foreseeable projects or physical activities, as described in section 7.7 Cumulative effects assessment;	This seems like strange and possibly inaccurate guidance. What governs the degree of residual Project effects (which is what is being sought in this bullet), is not interactions with cumulative effects (there can be a project residual effect even when there are no other cumulative effects causing agents), but rather the likelihood and degree of effectiveness of the mitigation applied to the Project effect, and the confidence that the proponent has and evidence it can provide to support this estimation. WC strongly suggests Canada revise this bullet for greater accuracy.
74	7.5	Effects assessment methodology	Section 7.5 notes that: "if a detailed description of effects cannot be provided, provide a rationale for the absence of details and a general description of the potential effects and related project activities (e.g., activities and effects related to closure and reclamation). The proponent should confirm the rationale with IAAC and the CNSC before submitting the Impact Statement (p. 40)." Woodland Cree does not agree with the suggestion that if an activity is too far in the future, the proponent may provide a less detailed assessment of effects, including those related to closure and reclamation.	Woodland Cree recommends that this statement be revised to require a comprehensive and rigorous assessment of all project phases, including closure and reclamation. The guidelines should explicitly encourage the proponent to not reduce any detail related to future-stage activities.
75	7.6	Mitigation and enhancement measures	Text reads: document specific suggestions raised by Indigenous Nations and communities for avoiding, mitigating or otherwise accommodating the project's environmental, health, social and economic effects, including potential effects and impacts on Indigenous Peoples and describe whether and how these measures will be incorporated in the project design;	Woodland Cree recommends additional guidance on this topic be included; i.e., "if an Indigenous Nation's or community's recommendation was not adopted by the proponent, a defensible rationale must be provided, including reference to comparative mitigative value of the measure proposed by the Indigenous Nation or community versus that committed to by the proponent, if any.

76	7.7	Cumulative effects assessment	Section 7.7 notes that: "Project components and activities should be considered in the cumulative effects analysis to understand synergistic, compensatory, masking or additive effects (p. 43)."	Woodland Cree recommends that Section 7.7 be revised to provide clearer, more actionable guidance on how practitioners should assess synergistic, compensatory, masking, or additive effects in cumulative effects analysis. References to relevant guidance documents should be provided for the proponent to review.
77	7.7	Cumulative effects assessment	<p>The text reads as follows:</p> <p>"The Impact Statement must:</p> <ul style="list-style-type: none"> - identify the VCs that will be subject to the cumulative effects assessment, including: all VCs for which the proponent or an Indigenous Nation and community anticipates residual effects or impacts on Indigenous Peoples and their rights from the project and those identified as a concern in the Planning phase (refer to Table 2); - include a rationale, with prior consultation with IAAC and the CNSC, if VCs are excluded from the cumulative effects assessment (p. 43)." <p>Woodland Cree wishes to note that the second bullet, which references Table 2, should be clarified to avoid implying it is exhaustive. Additionally, it is internally contradictory with the first bullet.</p>	<p>Woodland Cree recommends revising the guidance to clearly state that the cumulative effects assessment (CEA) must include all valued components (VCs) for which either the Proponent or Indigenous Nations and communities anticipate residual adverse effects or impacts.</p> <p>Woodland Cree recommends that the second bullet be revised to read as follows: "...the cumulative effects assessment, recognizing that all VCs which either the Proponent or Indigenous Nations and communities estimate will be subject to residual adverse effects must be included in the CEA."</p>
78	7.7	Cumulative effects assessment	<p>The text reads as follows:</p> <p>"Project activities to be considered include, but are not limited to:</p> <ul style="list-style-type: none"> - transmission lines - on-site storage of nuclear waste - potential component replacement projects and site upgrades - manufacturing and production plants - natural gas pipeline - other existing or planned energy sector projects (p. 44)" <p>Despite the disclaimer of "but are not limited to", this is a very partial list and therefore may be misleading to the proponent as they should be required to consider all human-caused changes that impact on the same VCs as their project, in the cumulative effects assessment.</p>	Woodland Cree recommends that the current partial list of project activities on p. 44 be either significantly expanded or removed entirely to avoid confusion and potential limitations. Instead, the guidelines should clearly state that all projects and activities that may impact the same Valued Components as the Project must be considered in the cumulative effects assessment.
79	7.7	Cumulative effects assessment	Text Reads: - consider the results of any relevant regional studies or regional assessments;	To facilitate proper assessment, the proponent should be required, as on aspect of their IS development, to produce a list of regional studies and assessments that are applicable, for agency, commission and parties to review at an interim IS Progress meeting. These type of interim, "are we on the right track" steps are critical to increasing IA effectiveness.
80	7.7	Cumulative effects assessment	<p>Text Reads: -describe how the selection of boundaries and other past, existing or future projects or activities for cumulative effects assessment were informed by consultations with the public, Indigenous Peoples, provincial ministries, federal authorities and other participants;</p> <p>Wording should be more specific, and deal with what happens in cases where these other parties select different boundaries than proposed by the Proponent. Need guidance on what happens if the spatial and temporal boundaries and scope of projects and activities to include in the CEA are not agreed upon between the parties. Does the proponent choose which to adopt, present both, how is the difference "papered" in the IS?</p>	Recommend change to " ... public, Indigenous Nations and communities, provincial ministries, federal authorities and other participants. Where one or more of these parties identifies boundaries or projects and activities that go beyond those identified by the Proponent, the Proponent shall show evidence in the IS of how it reconciled these positions".

81	7.8	Extent to which adverse federal effects are significant	Text Reads: the environmental, health, social and economic context within which likely effects may occur should be described and applied as part of the key criteria above, for example: □ the sensitivity and importance of affected aquatic and terrestrial species, including species at risk and species of importance for Indigenous Peoples,	Given widespread, longstanding and devastating impacts on rights practicability for Indigenous peoples, there should be specific reference in an additional example bullet to "the degree of change over time and sensitivity to further change of Indigenous rights practicability, as understood by the Indigenous Nations and communities themselves".
82	7.8	Extent to which adverse federal effects are significant	The text in Section 7.8 reads as follows: "describe how the probability or likelihood of that effect occurring and the degree of scientific uncertainty related to the data and methods used in the effect assessment, were considered in characterizing the extent of significance (p. 46)."	Woodland Cree recommends that this guidance be revised to include reference to level of agreement between western science and Indigenous Knowledge as a factor in consideration of uncertainty. For example, the text can be re-written as follows: "describe how the probability or likelihood of that effect occurring and the degree of scientific uncertainty and the degree to which findings of Western science and Indigenous Knowledge agree or disagree, related to the data and methods used in the effect assessment, were considered in characterizing the extent of significance"
83	7.8	Extent to which adverse federal effects are significant	Text Reads: Criteria and relevant benchmarks should be defined and applied with Indigenous Nations and communities, including but not limited to the description of effects on Indigenous Peoples. Criteria may include those identified in Guidance: Assessment of Potential Impacts on the Rights of Indigenous Peoples and other relevant criteria proposed by an Indigenous Nation or community. These criteria should be applied to determine the extent to which adverse effects on Indigenous Peoples are significant.	Add at the end of this bullet or in a new bullet: "Draft significance criteria and benchmarks should be provided to Indigenous Nations and communities for review and comment prior to their finalization. Where Indigenous proposed criteria and relevant benchmarks are not adopted, a rationale must be provided. The Proponent is strongly encouraged to engage Indigenous Nations and communities in the conduct of effects characterization and significance estimation for VCs that are strongly related to Indigenous rights and interests."
84	7.9.1	Requirement for site evaluation	There is nothing in this section about indigenous peoples and how they will be involved in site preparation evaluation.	Reference must be made in this section and in general in section 7.9, to how Indigenous peoples will be engaged in the site evaluation process. Please revise. Additionally, the site evaluation criteria outlined in Section 7.9.1 are also relevant to assessing alternative site locations during the Alternative Means Assessment. This should be noted in the introductory text of this section alongside the requirement for the proponent to engage Indigenous peoples to determine the site evaluation criteria.
85	7.9.1	Requirement for site evaluation	Text reads: "The proponent should provide a high-level overview of alternate sites considered prior to selecting the proposed site, including a brief description of the degree and depth of site evaluation used to narrow down the final choice(s) (p. 48)."	It is recommended that under the Guidance section of Section 7.9.1, the following text be added: "Deeper comparative analysis of all the above-noted criteria for each remaining site alternative must be conducted if the Impact Statement is considering two or more alternative sites."
86	7.9.4	Evaluation of hazards associated with external events	Text reads: The proponent must identify and assess each external natural and human-induced event with the following considerations:..... There is no indication that Indigenous Nations or communities will be involved in this process, for example no requirement that they will be engaged on these potential effects and allowed to provide input on how these would cause concern to present and future generations.	1. Include proper references to how Indigenous peoples will be involved in this evaluation; 2. Add a bullet to the effect of: [NEW BULLET] the likelihood, consequence scenarios depending on magnitude of event, and manageability of the event using available mitigation and committed to adaptive management mechanisms, and residual effects for each scenario after mitigation is applied. Some sort of risk likelihood/consequence matrix should be provided to situate events." 3. General comment: the level of detail in the bullets in 7.9.4 should be applies in 7.9.3 as well; currently that sub-section is difficult to parse or act on.

87	7.9.6	Population and emergency planning considerations	Text reads: Before submitting the application for a LTPS, the proponent must confirm with the surrounding municipalities and the affected provinces, territories, foreign states, and neighbouring countries that the implementation of...	Revise to add "Indigenous nations and communities" to the list of governance entities that must be engaged in this process.
88	7.9.6	Population and emergency planning considerations	Text reads: their respective emergency plans and related protective actions will accommodate the lifecycle of the proposed project. Discussions around early plans must include consideration of the following: <ul style="list-style-type: none"> - onsite response, including the capacity to bring offsite equipment onsite; - ability of offsite licensee staff to communicate with and access the site during a catastrophic event; - offsite response, and how it is coordinated between the licensee and federal, provincial and municipal government agencies playing a role in emergency preparedness and response; - how the licensee will coordinate with regulatory bodies; - how the licensee will respond and coordinate with emergency service providers 	Notification to Indigenous Nations and surrounding communities should be added to this list as well.
89	8.2.1	Baseline Conditions (Geology, Geochemistry and Geological Hazards)	Baseline conditions and how they are determined are important to Nations so there should be wording associated with this and input from the communities should be considered and incorporated in this section	A blanket statement for each VC-specific instructions section should identify that "Indigenous Knowledge has valuable information to inform baseline and trend-over-time conditions analysis and identification and assessment of Project effects and locations of heightened risk. The Proponent is expected to engage Indigenous Nations and communities in this process and provide evidence of how this occurred in the IS".
90	8.3.1	Baseline conditions (Topography, Soil and Sediment)	Baseline conditions and how they are determined are important to Nations so there should be wording associated with this and input from the communities should be considered and incorporated in this section	A blanket statement for each VC-specific instructions section should identify that "Indigenous Knowledge has valuable information to inform baseline and trend-over-time conditions analysis and identification and assessment of Project effects and locations of heightened risk. The Proponent is expected to engage Indigenous Nations and communities in this process and provide evidence of how this occurred in the IS".
91	8.6.1	Baseline Conditions (Atmospheric, Accoustic and Visual Environment)	No requirements for inclusion of Indigenous peoples or their IK in identifying key receptor points, noise and air quality parameters that are observable to Indigenous peoples, or acceptable levels of noise and air quality are included herein. This is a major gap in the assessment of critical sensory factors for Indigenous peoples.	TISGs should be revised to require evidence of inclusion of Indigenous peoples and their Indigenous Knowledge on the topics flagged at left for noise and air quality baseline and trend-over-time condition profiling.

92	8.6.2	Effects to the atmospheric, acoustic and visual environment	Text reads: □ describe engagement activities and, where appropriate, provide a record of engagement with Indigenous Nations and communities, the public, federal authorities, and interested parties including landowners regarding potential effects on the visual environment;	Woodland Cree recommends that the words "where appropriate" be removed; it is just as appropriate as the soundscape is the viewscape, so why have this delimiting language only for visual environment? Woodland Cree also notes that there is no discussion in Section 8.6.2 about gathering Indigenous Knowledge about likely effects on noise, air quality and visual landscape in the Project Case, as measured/observed by Indigenous peoples. This is a major gap in the assessment; all of the instructions above are for technical air quality, noise and visual environment but that is not how Indigenous observers perceive the environment, with their senses and in comparison to what they consider to be natural, normal and acceptable environmental conditions. More guidance on this "half" (IK) of the inputs to impact assessment is clearly required.
93	8.7.1	Baseline Conditions (Groundwater and Surface Water)	With water being an important VC for indigenous nations this section should speak to that in some capacity. Right now there are five pages of guidance in this sub-section and not a single item therein talks about understanding the importance of areas water bodies from an Indigenous perspective, Indigenous Knowledge of waterbody health, quality, quantity, external pressures, and changes over time. This is not acceptable to Woodland Cree.	Wording should be added to this section requiring the IS to: a. reflect Indigenous Nations and communities views and concerns about area waterways; b. capture and present on Indigenous Knowledge about waterways, including but not limited to the parameters noted at left; c. identify Indigenous observational parameters as critical inputs to the baseline, trend-over-time and Project and Planned Development Case assessments; d. identify changes over time in water from an Indigenous perspective; e. identify Indigenous perspectives on acceptable and natural water quality and quantity parameters; f. identify important waterbodies, including surface and "surfacing" (e.g., springs from groundwater sources) in the RSA, from an Indigenous perspective.
94	8.7.1	Baseline Conditions (Groundwater and Surface Water)	No special distinction of the mainstem of the Peace River to the way of life of area Indigenous Nations and communities is provided in this section.	Special emphasis should be flagged that the baseline conditions and trends-over-time in the Peace River water quality, quantity and impact causing agents over time should be given in this sub-section. In other words, the Proponent should be informed that they need to put special focus on understanding the Peace River and its protection as a key line of inquiry in this assessment.
95	8.7.2	Effects to groundwater and surface water	Similarly to Section 8.7.1, no guidance is provided about how Indigenous peoples and Indigenous Knowledge need to be involved in the assessment of effects on groundwater and surface water. This is not acceptable to Woodland Cree.	Greater guidance on what the Proponent needs to do to engage Indigenous Nations and communities and Indigenous Knowledge in its assessment of effects on groundwater and surface water needs to be built into this section. IAAC and CNSC can consult with Woodland Cree for further details.
96	8.7.3	Mitigation, monitoring and enhancement measures (Groundwater and Surface Water)	WCFN's participation in the monitoring of the Peace River is mandatory for a project of this scale and nature. Despite this, there is no mention of monitoring by Indigenous Nations or communities in this section of the TISG.	The TISG needs to be revised to require the Proponent to: identify that it is committed the monitoring of water by Indigenous Nations and communities, with special emphasis on the Peace River; identify all mitigation and enhancement measures related to water requested by Indigenous Nations and communities and how they were adopted or otherwise reconciled; and identify how the it engaged Indigenous Nations and communities in review of all committed to mitigation, monitoring and enhancement measures for water.

97	8.8.1	Baseline Conditions (Terrestrial, Riparian and Wetland Environments)	The same critique provided of Section 8.7 can be applied to Section 8.8. There is inadequate guidance re: engagement of Indigenous Nations and communities in the profiling of baseline and trend-over-time conditions, minimal reference to Indigenous values (a singular reference to medicines and country foods is included), and no requirement to consider Indigenous observational parameters re: the health, abundance, etc. of the environments in question. And no discussion of Indigenous Knowledge. This is not acceptable to Woodland Cree.	Wording should be added to this section requiring the IS to: a. reflect Indigenous Nations and communities views and concerns about area terrestrial, riparian and wetland environments; b. capture and present on Indigenous Knowledge about terrestrial, riparian and wetland environments; c. identify Indigenous Nations' and communities' observational parameters as critical inputs to the baseline, trend-over-time and Project and Planned Development Case assessments; d. identify changes over time in terrestrial, riparian and wetland environments from an Indigenous perspective; e. identify Indigenous perspectives on acceptable and natural terrestrial, riparian and wetland environmental conditions; f. identify important terrestrial, riparian and wetland environments (including but not limited to critical habitat, important harvesting areas) in the RSA, from an Indigenous perspective.
98	8.8.2	Effects to terrestrial, riparian and wetland environments	No guidance is provided about how Indigenous Nations and communities and Indigenous Knowledge need to be involved in the assessment of effects on terrestrial, riparian and wetland environments. This is not acceptable to Woodland Cree.	Greater guidance on what the Proponent needs to do to engage Indigenous Nations and communities and Indigenous Knowledge in its assessment of effects on terrestrial, riparian and wetland environments needs to be built into this section. IAAC and CNSC can consult with Woodland Cree for further details.
99	8.9.1	Baseline Conditions (Wildlife and their Habitat)	In Section 8.9.1, it is decreed that the proponent, in the Impact Statement, must "describe the source of the baseline data, data collection methods, and provide a rationale for any modelling approaches chosen, and describe how community and Indigenous Knowledge was incorporated (p. 82)." This is the only reference to Indigenous Knowledge in section 8.9.1. There is also a very broad request about the use of wildlife as a source of country foods and for fur-bearing animals. This is inadequate to give the proponent adequate guidance on how to engage Indigenous Nations and communities in baseline and trend-over-time data collection for wildlife.	Wording should be added to this section requiring the IS to: 1. reflect Indigenous Nations and communities views and concerns about wildlife and their habitat; 2. identify Indigenous Nations' and communities' observational parameters as critical inputs to the baseline, trend-over-time and Project and Planned Development Case assessments; 3. identify changes over time in wildlife and their habitat in the RSA from an Indigenous perspective; 4. identify Indigenous perspectives on acceptable and natural wildlife and wildlife habitat conditions; and 5. identify important wildlife habitat (including but not limited to critical habitat, important harvesting areas) in the RSA, from an Indigenous perspective. Additionally, Woodland Cree recommends that the list and content above must be reviewed and verified by each engaged Indigenous Nation and community prior to the submission of the Impact Statement.
100	8.9.2	Effects to terrestrial wildlife and their habitat	No consideration of the effects to wildlife and habitat and how that impacts Indigenous Nations and communities who use the areas is required in this guidance. Neither is there any reference to Indigenous Nations and communities and Indigenous Knowledge's role in assessing likely changes. This is not acceptable to Woodland Cree.	Greater guidance is required on what the Proponent needs to do to engage Indigenous Nations and communities and Indigenous Knowledge in its assessment of effects on wildlife and wildlife habitat needs to be built into this section. IAAC and CNSC can consult with Woodland Cree for further details.
101	8.9.3	Mitigation and enhancement measures (wildlife and their habitat)	Like other Indigenous Nations and communities, WCFN has an in-depth understanding of harvesting and wildlife and what needs to be done to maintain natural or near natural conditions for wildlife in the areas affected by the Project. This should be reflected in the TISG (including at 8.9.2).	Greater instruction to the Proponent to meaningfully engage Indigenous Nations and communities in the identification and testing the veracity of mitigation and enhancement measures is required.

102	8.10.1	Baseline Conditions (SARA)		The same requirements for engagement of Indigenous Nations and communities and integration of Indigenous Knowledge need to be applied to this section (see comments on sub-sections of Section 8 above).
103	8.11.1	Baseline Conditions (Fish and Fish Habitat)	Text Reads: describe the use of fish and aquatic plants as country foods, including a description of the particular species of importance. Where possible, sites used in the study areas or historically important sites for the collection of country foods must be identified and mapped, such as important fishing sites; This is the only reference, even oblique, to issues specific to Indigenous Nations and communities and Indigenous Knowledge in this section.	Wording should be added to this section requiring the IS to: a. reflect Indigenous Nations and communities views and concerns about fish and fish habitat; b. identify Indigenous observational parameters as critical inputs to the baseline, trend-over-time and Project and Planned Development Case assessments; d. identify changes over time in fish and fish habitat in the RSA from an Indigenous perspective; e. identify Indigenous perspectives on acceptable and natural fish and fish habitat conditions; f. identify important fish and fish habitat (including but not limited to critical habitat, important harvesting areas) in the RSA from the perspective of Indigenous peoples.
104	8.11.2	Effects to fish and fish habitat (also applicable to Section 8.10.2)	Woodland Cree questions that if a "pathway of effects" approach is required for fish and fish habitat, then why is it not similarly required for wildlife and wildlife habitat and other biophysical VCs? Similarly, Woodland Cree points out that there are 3.5 pages of guidance on assessment of effects on fish and fish habitat, none of which talks about Indigenous Nations' and communities' required role in that assessment, but only 1 page for wildlife and wildlife habitat. That leaves us wondering if there is adequate equivalency in the level of detail provided re: wildlife and wildlife habitat.	The Agency and Commission should: a. Provide more guidance on what the Proponent needs to do to engage Indigenous Nations and communities and Indigenous Knowledge in its assessment of effects on fish and fish habitat into this section; b. Revisit Section 8.10.2 and update the level of detail provided to support the Proponent's assessment of effects on wildlife and wildlife habitat to be reasonably commensurate with that provided for fish and fish habitat.
105	8.11.3	Mitigation and Enhancement measures (Fish and Fish Habitat)	The role of Indigenous Nations and communities in developing mitigation and offsetting measures is not clear in the draft TISG.	Greater instruction to the Proponent to meaningfully engage with Indigenous Nations and communities in the identification and testing the veracity of mitigation and enhancement measures is required. Of particular importance is more clarity on how Indigenous Nations and communities must be engaged in the process of developing a fish habitat offsetting and compensation plan for the Project. Engagement with Indigenous Nations and communities on locations, types, quantum, and collaborative implementation of offsetting is critical and should be recognized as such in the TISG.
106	8.12.1	Baseline Conditions (Birds)	Text Reads: - identify, and show on maps, areas of concentration of birds, including sites used for breeding, feeding, wintering, resting, staging and migrating;	The Proponent should be explicitly required to incorporate indigenous knowledge related to species of importance to nations and communities. This is part of a larger gap in the overall Section 8.12 re: lack of guidance on the role of Indigenous Nations and communities and IK in developing the IS. Wording should be added to this section requiring the IS to: a. reflect Indigenous Nations and communities views and concerns about birds and bird habitat; b. identify Indigenous observational parameters as critical inputs to the baseline, trend-over-time and Project and Planned Development Case assessments; d. identify changes over time in birds and bird habitat in the RSA from an Indigenous perspective; e. identify Indigenous perspectives on acceptable and natural bird and bird habitat conditions; f. identify important birds and bird habitat (including but not limited to critical habitat, important harvesting areas) in the RSA from the perspective of Indigenous peoples.

107	8.12.2	Effects to birds and their habitat	No consideration of the effects to birds and bird habitat and how that impacts indigenous people who use the areas is required in this guidance. Neither is there any reference to the role of Indigenous Nations and communities and Indigenous Knowledge in assessing likely changes.	Greater guidance is required on what the Proponent needs to do to engage Indigenous Nations and communities and Indigenous Knowledge in its assessment of effects on wildlife and wildlife habitat needs to be built into this section. IAAC and CNSC can consult with Woodland Cree for further details.
108	8.12.3	Mitigation and Enhancement measures (Birds)		Greater instruction to the Proponent to meaningfully engage Indigenous Nations and communities in the identification and testing the veracity of mitigation and enhancement measures is required.
109	9	Health, Social and Economic Conditions	Section 9.0 lists around 10 resources that the proponent should refer to when undertaking an assessment of adverse effects to the health, social or economic conditions of the Indigenous Peoples of Canada (pp. 99 to 100). However, Woodland Cree notes that there are more resources that should be added to this list.	Woodland Cree recommends that the following resources from the First Nations Major Projects Coalition's Guidance Appendices (January 2020) be added to the list of resources in Section 9.0: 1. Appendix 1 – Socio-economic Impact Assessment 2. Appendix 2 – Cultural Impact Assessment 3. Appendix 4 – Indigenous Health Impact Assessment 4. Appendix 5 – Indigenous Land Use Assessment https://fnmpc.ca/wp-content/uploads/FNMPCPASGuidanceappendices-FINALJanuary2020.pdf
110	9 (also 10.3)	Health, Social and Economic Conditions	Where comments are provided on Section 9, they may equally apply or may, at the Agency and Commission's discretion, better apply in Section 10.3 on Health, Social and Economic Conditions of Indigenous Peoples.	Agency and Commission to decide whether Section 9 or Section 10.3 is appropriate location for integrations of comments on Section 9 below.
111	9.1.1	Baseline conditions for health, social and economic conditions	Text Reads: The proponent should refer to the Health Canada guides to ensure that best practices are followed in collecting baseline information for assessment of the project's impacts on human health caused by changes in air quality, noise levels, the quality of drinking water and water used for recreational purposes, traditional foods and the multiple contaminant exposure routes.	If the Agency and Commission are saying "Follow Health Canada's guidance on biophysical causes and effects on health", then the Agency and Commission should identify similarly adequate references for conduct of assessment of effects on social determinants of health. In addition, any previous studies or current studies that will be completed should be considered in this section as would assist with the baseline conditions.
112	9.1.2	Effects to human health, social and economic conditions	The absence of specific reference to mental health/psychosocial impacts of siting a nuclear power plant, a facility that brings with it a huge amount of fear and stigma among many Canadians, including Indigenous Nations and communities like WCFN, is highly problematic here. This has to be a high priority in this assessment.	The TISG need to be updated to include specific requirements re: assessment of psychosocial/mental health impacts that may occur related to the siting of a major nuclear power plant as a result of the project. We understand that both IAAC and the CNSC have been provided with materials to better understand mental health effects and psychosocial impacts in recent years; those learnings need to be incorporated into this section of the TISG. THIS IS A MAJOR GAP IN THE TISG.
113	9.1.3 (also Sections 9.1.2 and 9.5)	Mitigation and enhancement measures for health, social and economic conditions	There is no recognition in the material on economic effects and benefits about differential ability to take advantage of economic opportunities within and among Indigenous sub-populations, and the systemic barriers that may need to be lifted to increase this ability to take advantage.	The TISG needs to require the Proponent to work with impacted Indigenous Nations and communities to identify any and all constraints on their ability to take advantage of economic opportunities associated with the Project (Section 9.1.2), along with all commitments by the Proponent to remove, reduce those constraints (Section 9.1.3).. This includes education, training, social, transportation, business development, and other constraints. This issue is also relevant to Section 9.5 of the TISG.

114	9.2.2	Effects on biophysical determinants of health	9.2 does not include a sub-section on mitigation, monitoring or accommodation for biophysical health impacts. There needs to be guidance on this topic.	The TISG should be updated to include a specific section on mitigation, monitoring and accommodation for residual biophysical health impacts.
115	9.3 (general)	Baseline conditions for social determinants of health and community well-being.	<p>Projects involving radioactivity are commonly perceived by the public to represent an elevated risk to human health and the environment. This has shown to result in a degradation of wellbeing through a variety of psychosocial impacts, even when measurable physical risks are low. Examples of impacts include but are not limited to:</p> <p>Anxiety and stress – fear of radiation exposure</p> <p>Loss of cultural identity – direct or perceived disruption of traditional land use or spiritual sites</p> <p>Distrust of authorities – belief that risks are hidden or downplayed</p> <p>Stigma – communities labelled as “contaminated” or unsafe</p> <p>Social division – conflict between community members that support or oppose projects</p> <p>Section 9.3 of the draft guidelines is intended to address social determinants of health and community wellbeing, including perceived risks. Specifically, the assessment is required to: “identify any emotional or social stress factor that may result from the project, particularly concerns regarding perceived public safety risks due to the project or due to potential accidents or malfunctions”. While Woodland Cree is supportive of this aspect being included in the guidelines, the Nation is of the opinion that the assessment of psychosocial impacts should be based on observations from other projects involving radioactivity, including projects that have affected Indigenous peoples. In addition, Woodland Cree emphasizes that psychosocial impacts attributable to perceived risks should be assessed on par with biophysical risks.</p> <p>Woodland Cree notes that the draft guidelines state: “The proponent is encouraged to work with Indigenous Nations and communities to identify holistic VCs, which may increase the efficiency of the assessment and clarity of presentation.” Woodland Cree will advocate for the inclusion of mental health as a discrete valued component in the assessment.</p>	<p>With regard to the assessment of psychosocial impacts on mental health, Woodland Cree recommends that the IA guidelines be modified to:</p> <p>Require the proponent to base their assessment of psychosocial impacts on case studies from other projects involving radioactivity. At minimum, the case studies should include locations where nuclear reactor accidents/malfunctions have occurred (e.g., Fukushima, Chernobyl, Three Mile Island) and other projects that are known to have had psychosocial impacts on Indigenous peoples (e.g., Port Radium uranium mine, Ray Rock uranium mine, Elliot Lake uranium mines, Yucca mountain, WR-1 Reactor).</p> <p>Require that the proponent demonstrate how they will mitigate all adverse psychosocial impacts caused by real or perceived risks identified by the case studies noted above.</p> <p>Clarify that psychosocial health impacts attributable to perceived risks will be assessed on par with biophysical risks.</p> <p>Include mental health as a valued component in the assessment.</p>
116	9.5.3	Effects on business environment and local economy	In Section 9.5.3, it is described that the Impact Statement must describe elements that are related to the economics of the project as well as the potential effects of the project on the regional economy (pp. 112 to 114). Upon review of the list provided, Woodland Cree notes that there is no requirement for the proponent to describe Indigenous ownership structures in relation to the Project.	Woodland Cree recommends that a line item should be added for “provision of details about any Indigenous ownership structures in relation to the Project”.
117	10	Indigenous Peoples	Text Reads: The proponent should work with Indigenous Nations and communities and respect each Nation’s preference regarding the assessment of impacts on Indigenous rights and interests, including residual impacts and cumulative impacts.	Reference to “should” to be replaced with more directive language, along the lines of “The proponent will work with Indigenous Nations and communities, to the extent that each community is willing to participate”.

118	10	Indigenous Peoples	<p>Section 10 notes that "The Impact Statement must contain an assessment for each Indigenous Nation and community potentially affected by the project, and summarize any past, present and anticipated future use of, and practices within, the project areas (p. 115)."</p> <p>However, it is unclear to Woodland Cree what party would be responsible for assessing impacts on its rights. The wording suggests that the proponent will be responsible, however, in Woodland Cree's perspective, this is not appropriate.</p>	<p>Woodland Cree recommends that there is greater clarity provided throughout the entire Tailored Impact Statement Guidelines about the roles and responsibilities of the parties involved in the assessment. For this section specifically, the IAAC and the CNSC should explicitly state what party will be responsible for undertaking the assessment of impacts on Indigenous rights. In Woodland Cree's perspective, it should be the specific Indigenous Nation or community whose rights may be impacted.</p>
119	10.1.2	Effects to Indigenous Physical and Cultural Heritage	<p>This section does not include a 10.1.3 for mitigation, monitoring and enhancement measures for culture. It should. Even if it doesn't more detail is requested re: provisions for cultural protection, offsetting and enhancement, committed to by the Proponent.</p>	<p>More detail is requested in the TISG re: provisions for cultural protection, offsetting and enhancement, committed to by the Proponent.</p>
120	10.2	Current use of lands and resources for traditional purposes	<p>Section 10.2 states that "The proponent must follow the Technical Guidance for Assessing the Current Use of Lands and Resources for Traditional Purposes under CEEA, 2012 or subsequent revisions made prior to submission of the Impact Statement to ensure that the relevant provisions of the IAA are met (p. 117)."</p> <p>Woodland Cree notes that the guidance cited in the draft Integrated Guidelines is significantly outdated and should be replaced with more relevant guidelines.</p>	<p>Woodland Cree recommends the following:</p> <ol style="list-style-type: none"> 1. Establishment of a technical working group that is focused on impacts to Indigenous Peoples to develop updated methodological guidance that can be shared with the proponent as it prepares its Impact Statement. This must occur as soon as possible. 2. The IAAC should update Section 10.2 to reference more relevant guidance. <p>Woodland Cree has already requested that the existing First Nations Major Projects Coalitions (FNMPCC) guidance be adopted and provided to the proponent in the interim. This request is re-iterated.</p>
121	10.2.2	Effects to current use of lands and resources for traditional purposes	<p>In Section 10.2.2, it is stated that the Impact Statement must "assess the effects on current use of lands and resources for traditional purposes, based on a comparison with baseline conditions which consider cumulative effects, including changes to ... (p. 118)."</p> <p>A footnote should be added to clarify the scope of engagement and the criteria to be considered.</p>	<p>Woodland Cree requests that a footnote be added, that clarifies that this is a minimum list only. This footnote should say "The proponent will engage with impacted Indigenous Nations and communities and integrate other relevant criteria which can be used to identify impacts on traditional land and resource use than those identified below".</p>

122	10.3.2	Effects to health, social and economic conditions of Indigenous Peoples	<p>In Section 10.3.2, it is stated that the Impact Statement must describe the following the health, social and economic effects:</p> <ul style="list-style-type: none"> - "from changes to radiological conditions; - Indigenous economic participation in the project (e.g., number of workers, revenue sharing, ownership, equity and other related measures); - effects on Indigenous Nations and communities' ability to manage or improve social and economic conditions including in relation to engaging in traditional and other economic activities; - effects to commercial fisheries, including species fished (along with catch rates and fishing days), number of licences, value of fisheries and breakdown between domestic vs. international fisheries, where applicable; - Indigenous Nation and community-specific benefit plans, including economic development, whether through an agreement or otherwise; - how positive impacts on one or more Nation or community may result in adverse impacts on one or more other Nation(s) or community; - other potential project effects identified by Indigenous Nations and communities (p. 120)." <p>However, Woodland Cree notes the absence of any reference to psychosocial impacts related to a nuclear power plant, which is a critical oversight. Given that the proposed project is a nuclear development, there are several psychosocial effects that must be documented as they have significant implications for Indigenous Peoples' health, culture, and connection to land. These effects must be properly assessed and quantified.</p>	<p>Woodland Cree recommends that Section 10.3.2 is revised to include identification of potential psychosocial impacts that are associated with nuclear projects and, where possible, for the proponent to provide a quantification.</p> <p>Additionally, it should be required that the proponent in the Impact Statement map identify the spatial zone of influence for these psychosocial impacts. This would include a 'project avoidance zone' and a 'sensory zone of influence' around the proposed project site. This is necessary to understand the spatial scale of these effects.</p>
123	10.4.2	Impacts on the rights of Indigenous Peoples	<p>When outlining the following factors that the proponent must consider in the Impact Statement, the draft Tailored Guidelines states that: "The proponent, in collaboration with Indigenous Nations and communities, must consider the following factors, as relevant:</p> <ul style="list-style-type: none"> - impacts on fishing including impacts on economics, food, culture, and ceremony; - impacts on Indigenous governance; - impacts on harvesting; - impacts on navigation; - impacts on cultural practices including sharing Indigenous Knowledge; and - Indigenous Nations and communities' approach to managing changing climate (pp. 121 to 121)." <p>While this list is helpful, there is the risk that the proponent could interpret it as exhaustive. This would impact the scope of the assessment.</p>	<p>Woodland Cree requests that the introductory statement is either revised, or that a footnote is added, that clarifies that this is a minimum list only. "The proponent must engage with each Indigenous Nation and allow those Nations to identify the full scope of their rights and interests that may potentially be impacted by the Project."</p>
124	12.1	Risk Assessment	<p>As part of the Risk Assessment in the Impact Statement, the proponent is required to "include consideration of:</p> <ul style="list-style-type: none"> - natural events such as flooding, earthquake (natural and induced), forest fires, high winds, tornadoes, landslides, blizzards, drought, ice storms, hail and lightning; - malevolent acts, including the potential for vandalism or sabotage; - vehicle accidents and collisions; - malfunction or failure of upstream hydroelectric facilities; - other human-induced external events, such as at other facilities; and - potential climate change over the project lifecycle. (p. 126)." <p>Woodland Cree notes that there is no mention of the proponent having to identify any potential human (i.e., operator) error or malfunctions of project components, including both hardware and software systems.</p>	<p>Woodland Cree recommends that the list of risk factors provided in Section 12 be expanded to include human error as well as malfunctions or failures of project components, including hardware and software systems.</p>

125	12.2 (or alternatively, Section 12.3)	Mitigation and enhancement measures	Text Reads: describe mitigation measures for the adverse environmental, health, social and economic effects, as well as impacts on Indigenous rights and interests, in the event of an accident or malfunction, such as emergency response and repair procedures that would be put in place;	The TISG should be updated to include requirement for Proponent to identify how it will involve Indigenous Nations and communities in emergency response planning and implementation. If more appropriate, revision can be made to Section 12.3.
126	13	Effects of the Environment	Section 13 of the draft Tailored Guidelines outlines how the Impact Statement must consider "the project's climate resilience and how the impacts of climate change have been integrated into the project design and planning throughout the life of the project (p. 131)," among other factors related to climate change. However, Woodland Cree notes that there is limited guidance provided in Section 13 to the proponent on which climate change scenarios would be relevant to consider and integrate into this section of the Impact Statement.	Woodland Cree recommends that Section 13 be revised to provide clear guidance to the proponent on which climate change scenarios (i.e., IPCC) should be integrated. This will also be necessary to ensure consistency with those climate change scenarios considered in other sections such as the cumulative effects assessment.
127	15	Sustainability	Upon review of Section 15, it is noted that there is no mention of the proponent needing to engage with Indigenous Nations and communities when doing their analysis of the extent to which the project's likely positive effects and adverse federal effects contribute to sustainability.	Woodland Cree recommends that Section 15 be revised to require the proponent to engage with impacted Indigenous Nations and communities to identify sustainability criteria and valued components from their perspectives.
128	16	Follow-up Program	It is Woodland Cree's expectation that a complete Environmental Assessment Follow-Up Monitoring Plan be a required component of the Impact Statement. However, this is not currently reflected in Section 16. Additionally, all commitments related to Indigenous monitoring must be clearly described in this section.	Woodland Cree requires that the Environmental Assessment Follow-Up Monitoring Plan be a required part of the Impact Statement identified in the Integrated Guidelines. Woodland Cree recommends that Section 16 be revised to outline all commitments to Indigenous monitoring, including how Indigenous Nations will be supported to carry out monitoring activities, the duration of those commitments, and how monitoring results will inform future decision-making and adaptive management.
129	16.4	Adaptive Management Framework	Section 16.4 states: "Please refer to IAAC guidance on Adaptive Management Measures under the Canadian Environmental Assessment Act 1992 (guidance to be updated) (p. 143)." However, there is no mention of the involvement of Indigenous Nations in the development or implementation of the Adaptive Management Plans.	Woodland Cree recommends that the entire Section 16.4 is revised to provide guidance to the proponent as to when and how they should engage with Indigenous groups throughout the development of Adaptive Management Plans. Additionally, this section should also require that the proponent, in the Impact Statement, describe how they involved Indigenous groups in the development of Adaptive Management Plans, and will involve them in the implementation of said AMPs, should the Project proceed.