



WOODLAND CREE FIRST NATION

General Delivery, Cadotte Lake, Alberta, T0H 0N0

Phone: 780-629-3803 Fax: 780-629-3865

Toll Free: 1-800-465-8029

April 15, 2026

Peace River Nuclear Power Project
Impact Assessment Agency of Canada
160 Elgin Street, 22nd Floor
Ottawa, Ontario K1A 0H3
Telephone: 613-699-6778
Email: peacenuclear-nucleairepaix@iaac-aeic.gc.ca

RE: Peace River Nuclear Power Project, Project Reference Number: 89430; Initial Project Description Comments and Concerns

Dear Impact Assessment Agency of Canada,

Woodland Cree First Nation (WCFN) appreciates the opportunity to review the February 2026 Updated Initial Project Description (IPD) and to continue engaging in this process in good faith. While we acknowledge the revisions made since the original submission, these revisions are focused on the additional information concerning the AP1000 reactor technology only. The Proponent has not taken the opportunity to update the IPD to address Woodland Cree concerns previously submitted on May 14, 2025. These issues continue to limit WCFN's ability to fully understand the project's implications and to meaningfully assess potential impacts on our rights, lands, and community well-being.

The following provides a summary of WCFN concerns as they relate to the initial letter submitted on May 14, 2025, along with the updated IPD review conducted:

- **Insufficient engagement and consideration of WCFN concerns.** With this being an unprecedented project type in Alberta and located in the heart of the Woodland Cree's Territory, WCFN expects to be sufficiently engaged and their input to be considered appropriately. The Project process was paused on August 20, 2025, with the resuming of Phase 1 of the federal impact assessment process occurring on **March 2, 2026**. During this period **Energy Alberta has taken no meaningful steps** to address the issues that led to the pause in the first place. The Nation provided the proponent with the information required to establish a capacity funding agreement months ago. Despite this, Energy Alberta has not substantially engaged, has not negotiated, and has not finalized the agreement. This lack of engagement alone prevents the Nation from being able to participate meaningfully in the assessment as there are significant concerns that remain unresolved. After reviewing the changes made to the IPD, it has been identified that very

few changes were implemented and do not provide any detailed information on how concerns previously identified will be addressed.

- **Relationship with Energy Alberta.** WCFN sees that there is still much work to be done to build the relationship between Woodland Cree and Energy Alberta. Our initial letter submitted that the IPD submission was premature. The submission of the IPD triggered the IAA process, which put unnecessary pressure on WCFN, when Energy Alberta could have followed recommendations from IAAC to use Phase Zero to build strong relationships, gather pertinent information about projects effects on affected parties, and to build bilateral processes for a meaningful assessment process. Despite the pause that occurred which allowed ample time for Energy Alberta the opportunity to initiate the recommendations of IAAC, Energy Alberta clearly did not utilize this time. This is reflected in the lack of consideration of WCFN's comments/concerns on the initial IPD, which remain unconsidered or adequate responses provided in the IPD update that has been reviewed.
- **Relationship with the Crown.** WCFN provided its expectations of the Federal and Provincial crowns in a previous letter provided on May 14, 2025. It was WCFN's expectation that the Federal and Provincial Crowns fully involve WCFN on a government-to-government and Nation-to Nation basis in the impact assessment. The updated IPD still does not provide any level of detail on how this has been further achieved since the initial review and pause of the IAA process.
- **Woodland Cree Comments on the Updated IPD.** Woodland Cree provided comments on the initial IPD along with a letter. Upon reviewing the updated IPD little effort was put into addressing or acknowledging the comments and concerns raised by WCFN. The changes that were made either changed language to suggest that the proponent has been engaging meaningfully with WCFN through this process, or were related to the AP1000 reactor technology. There were some other changes related to plans or assessments no clear timelines or criteria. The lack of effort to specifically acknowledge or provide context around comments provided by WCFN, gives the impression that matters raised are not considered important. The attached comment table (**Attachment 1**) provides further details and identifies where these minor changes have occurred.
- **A Note on the Timing Pressures of Phase 1.** WCFN identified in the letter dated May 14, 2025, the intensive pressure Phase 1 will have on the WCFN. At the time of the letter Energy Alberta and Woodland Cree had not yet addressed the scope, staging, funding or other aspects for any of the studies required to fully characterize the effects of this Project. While there was a pause of Phase 1 that occurred August 20, 2025, the resumption of Phase 1 on March 2, 2026 was not supported by WCFN. The key items identified were continued lack of engagement, no confirmation or agreement on studies, no progress on readiness as well as no indication that the proponent intends to meet its obligations to the Nation or to the process. Attached to the March 2026 letter, was a readiness evaluation tool which clearly highlighted that the proponent has not met the



WOODLAND CREE FIRST NATION

General Delivery, Cadotte Lake, Alberta, T0H 0N0

Phone: 780-629-3803 Fax: 780-629-3865

Toll Free: 1-800-465-8029

minimum requirements necessary to justify moving forward. Advancing the process now would undermine the integrity of the assessment and the Nation's ability to participate meaningfully.

- Extensive Need for Studies and Assessments with Deep Woodland Cree Involvement. With high potential impacts on Woodland Cree's way of life, culture and rights practices, food security, use of the Peace River, and health, social and economic conditions from building a major nuclear reactor in the heart of our traditional territory, WCFN previously provided potential required studies in the letter dated May 14, 2025. With limited engagement throughout the pause period and no consideration of comments and concerns addresses through the review of the updated IPD, this issue remains outstanding. This clearly demonstrates that no effort was made to further discussions with WCFN or provide additional clarification of the details of the commitments anticipated by WCFN.
- Woodland Cree's Expectations of the Federal Impact Assessment. In WCFN's initial review and letter provided, key practices in relation to the IAA process were outlined and were expected to be reflected in the Phase 1 documentation. WCFN encouraged Canada and the proponent to ensure that Woodland Cree was meaningfully integrated into the regulatory process by providing expectations that were setup in the letter dated May 14, 2025. Based on the review conducted and the lack of engagement, proposed measures remain conceptual, with limited detail on effectiveness, enforceability, or how WCFN will be involved in monitoring and adaptive management.

While these issues were raised in WCFN's original review, and while some minor adjustments have been made, the updated IPD does not yet meet the standard required for informed decision-making or for upholding the Crown's duty to consult and accommodate.

WCFN remains committed to working collaboratively to resolve these deficiencies. We request that the proponent and the Crown address the outstanding issues outlined in our accompanying detailed review and provide the necessary information before the project proceeds to subsequent stages.

We look forward to continued dialogue and to receiving a revised IPD that meaningfully incorporates WCFN's concerns, knowledge, and rights.

Sincerely,

<Original signed by>

Jenna Strachan

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

Attachment:

Appendix 1: Review of Energy Alberta's "PEACE RIVER NUCLEAR POWER PROJECT - Initial Project Description", Report No. CA0038431-24003-R-Rev1, updated February 2026.