

ANNEX 1: Review of Energy Alberta’s “PEACE RIVER NUCLEAR POWER PROJECT - Initial Project Description”, Report No. CA0038431-24003-R-Rev1, updated February 2026.

The following tables provide a summary and review of the adequacy of the response to Woodland Cree First Nation’s (“Woodland Cree” or “WCFN”) comments on the Initial Project Description (“IPD”), sent May 14, 2025 based on the Proponent’s resubmission of an updated IPD. Table 1 outlines and reviews responses to information gaps in the updated IPD (provided February 2026¹) identified by Woodland Cree. Table 2 identifies and reviews Proponent responses to Woodland Cree requests for studies based on their response to the Summary of Issues and the updated IPD (2026).

The Updated IPD (2026) focuses on the additional information concerning the AP1000 reactor technology only and the Proponent has not taken the opportunity to update the IPD to address Woodland Cree Concerns. Firelight recommends that Woodland Cree seek both additional commitments from the Proponent and updates to the Tailored Impact Statement Guidelines before they are finalized by the Agency in-order to assure that these concerns are carried forward in the Impact Assessment process and resolved.

Table 1 Review of updated IPD in response to WCFN comments

Section/ Page	Original WCFN Comment and Request	Adequacy of Changes in the IPD	Additional Request	Resolved?
1. Potential Effects				
4.3.5.1 Activities (Decommissioning); 4.6.6 Alternative	Onsite waste storage and management could have critical impacts to Woodland Cree. These plans will contribute to the cumulative impacts of waste storage, disposal and processing facilities in Woodland Cree’s territory, which are already significant due to several other temporally and geographically linked projects.	The Proponent has recognized waste management and water contamination as an Indigenous topic of interest in Table 3.2-1 but has not provided	Proponent to provide commitment to involve Woodland Cree in determining waste management strategies and their impacts.	No

¹ Energy Alberta. February 2026. Peace River Nuclear Power Project Initial Project Description. Available at: <https://iaac-aeic.gc.ca/050/documents/p89430/165254E.pdf>

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Waste Management	There is insufficient information in the IPD about potential water and soil contamination and mitigation measures. Woodland Cree must be involved in decision making for the chosen waste management strategy.	detailed information on how that concern will be addressed.	IAAC to include requirements for the examination of waste management impacts to water and soil as part of the TISG.	
4.4.2.3.4 Exclusion and Emergency Planning Zones	<p>The Proponent in this section discusses exclusion zones around the Project area, including a larger controlled area surrounding the site. This would have a permanent effect on Woodland Cree First Nation and would damage rights in the area, potentially in perpetuity when considered in combination with stigma that may be created by a nuclear power plant. The Proponent should detail and indicate on a map the entire area that would exclude access for First Nations exercising their rights.</p> <p>In addition, the Proponent should identify how it is going to, in the EIS, identify the likely “zone of influence” for Indigenous rights practice both in a (1) normal operations scenario and (2) in a worst-case accident/malfunction scenario.</p>	<p>A permanent exclusion zone remains at 500m around each reactor building. The proponent has added that information on the extent of the emergency planning zone (EPZ, farthest reach of radioactive effects in an emergency offsite release) will be determined in the future by Alberta and local municipalities (as AB doesn’t have a regulation yet). CNSC regulations (REGDOC-2.10.1) typically place the EPZ as 8-16km, but modern reactors may not need as much.</p> <p>No mention of WCFN involvement, and information on the what</p>	<p>Proponent to detail and indicate on a map the entire area that would exclude access for First Nations exercising their rights in the EIS and/or other assessment documents.</p> <p>Proponent to also commit to working with Woodland Cree and other affected First Nations to identify the likely “zone of influence” for Indigenous rights practice both in a (1) normal operations scenario and (2) in a worst-case accident/malfunction scenario.</p> <p>IAAC to require involvement of affected First Nations in scoping the zone of Influence as part of TISG requirements.</p>	No

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		the EPZ will be is still lacking.		
5.2.3.3 Fish and Fish Habitat	<p>The Proponent writes that the project is not anticipated to impact any aquatic species at risk (p. 5-39). However, there are numerous aquatic species at risk that have been documented in the Peace River and are listed in Table 5.2-4. The proponent assumed that, because these species have not been recorded within 5 km of the project site, they will experience no impact. However, this assumption is overly simplistic and overlooks how the potential withdrawal of water from the Peace River during project operations can have an impact on both upstream and downstream fish populations and habitats. Additionally, the fish and fish habitat information that this assumption is based on is from a desktop review of AEPA FMIS 2024. This raises concerns to Woodland Cree about the accuracy and reliability of the proponents' conclusions.</p> <p>Given these uncertainties, the proponent should revise the statement to acknowledge that there is low confidence in this prediction, and that there is a potential for aquatic species at risk to be impacted.</p>	There has been no changes to wording in this section, it still claims that “The Project is not anticipated to impact aquatic species at risk.” (pg.5-39).	<p>Proponent to acknowledge that there is low confidence in this prediction, and that there is a potential for aquatic species at risk to be impacted. Proponent to commit to working with Woodland Cree First Nation to assess impacts to aquatic Species at Risk and culturally important species.</p> <p>Proponent to commit to working with Woodland Cree to determine the scope of the assessment of potential impacts to aquatic Species at Risk.</p> <p>IAAC to include a requirement in the TISG for the assessment of impacts to Aquatic Species at Risk and Aquatic Species of Cultural importance to First Nations, and this assessment must be informed by Traditional Knowledge.</p>	No
5.6.4.2 Health Services	The section on Health services does not detail the potential effects of an influx of thousands of workers to the area and the potential for	No changes to text.	Proponent to commit to assessing the potential effects of an influx of thousands of	No

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	strain on local infrastructure and health services in the area, in particular impacts on Indigenous Peoples as a result.		workers to the area and the potential for strain on local infrastructure and health services as part of the EIS. IAAC to require the assessment of worker influx on the health and well-being of First Nations as part of TISG requirements.	
5.6.4.4 Transportation	The section on Transportation does not detail the potential project effects of increased traffic in the area as a result of the Project, including for example on community safety and accidents risk, wildlife injury and mortality, etc. and how this may impact Indigenous peoples.	No changes to text.	Proponent to commit to assessing impacts associated with increased traffic including but not limited to community safety and accidents risk, wildlife injury and mortality, etc. and how this may impact Indigenous peoples. IAAC to include requirement for assessment of traffic induced impacts as part of the TISG.	No
7.6.1 Traditional Land and Resource Use	This section does not discuss any potential psychosocial impact from the project on traditional land and resource use.	No changes to text.	Proponent to commit to working with Woodland Cree to assess psychosocial impacts from the Project. IAAC to require the assessment of mental well-being as a component of health – including the assessment of	No

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			psychosocial impacts as part of TISG requirements.	
7.7 Impacts to the Health, Social, and Economic Conditions of Indigenous Peoples	The Proponent focuses on positive impacts of employment in the region as a result of this project. However, there is no inclusion on the potential adverse effects on Indigenous communities where higher paying jobs may attract members away from working in essential community services.	No changes to text.	Proponent to commit to working with Woodland Cree to assess socio-economic impacts and where requested, by Woodland Cree, provide capacity for Woodland Cree-led Socioeconomic and Well-being studies. IAAC to require the full assessment of socio-economic impacts for each affected First Nation as part of TISG requirements.	No
2. Potential Effects on specific sub-populations (i.e., GBA+)				
4.3.6 Labour Force	The Proponent estimates that the project construction workforce will be up to 5,000 workers at peak, and that the operational workforce would be at 2,700 workers. However, there is no description of any potential risks that this may have on vulnerable sub-populations.	Change in estimated jobs (5,000-8,000 construction, 1,600-2,700 operations), but no added context for potential risks to vulnerable sub-populations, as requested.	Proponent must recognize that that there are potential risks from the influx of jobs to vulnerable sub-populations and commit to working with Woodland Cree on conducting GBA+ analysis. IAAC to require First Nation involvement in GBA+ assessment as part of TISG requirements and the GBA+ analysis must include the size	No

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			of the workforce as a project interaction.	
7.4.3 Gender-Based Analysis Plus	<p>The Proponent refers to applying a gender-based analysis plus (GBA+) framework to identify how different groups may experience impacts from the proposed project. The Proponent notes that effects will be described based on both data collected and concerns expressed through engagements with Indigenous communities.</p> <p>Woodland Cree notes that while engagement is an important aspect of the GBA+ framework, Indigenous involvement in the GBA+ analysis should not be limited to only being engaged by the Proponent. There must be commitments in place that the Proponent should integrate IK and IKUS data into the GBA+ analysis and provide communities with the opportunity to verify how their knowledge has been integrated into the analysis.</p>	No change to text.	<p>Proponent to commit to working with Woodland Cree First Nation on a GBA+ assessment.</p> <p>IAAC to require that the GBA+ analysis be informed by Indigenous Knowledge.</p>	No
7.4.3 Gender-Based Analysis Plus	<p>The Proponent notes that “Qualitative information on equality, diversity, inclusion, and related issues will be collected from studies and consultations.” However, this should not be limited to qualitative information only, as quantitative information will also be critical. What quantitative data on these topics does the Proponent plan to integrate?</p>	As above.	<p>Proponent to commit to working with Woodland Cree First Nation on a GBA+ assessment. (See Above)</p> <p>IAAC to require that the GBA+ analysis be informed by Indigenous Knowledge.</p>	No
3. Potential Benefits				
4.1.4 Value Added and	The Proponent highlights there will be opportunities for partnerships with Indigenous	No change to text.	Proponent to commit to providing further information	No

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Economic Growth	Nations. No discussion on what benefits packages are on offer by the proponent is included, so there is nothing to work off.		to Woodland Cree First Nation on what potential partnerships may entail, and how the Proponent will work with Woodland Cree First Nation to develop a partnership if a partnership is desired by Woodland Cree First Nation.	
7.7 Impacts to the Health, Social, and Economic Conditions of Indigenous Peoples	<p>The Proponent states that they are committed to engaging with Indigenous groups to identify opportunities for employment, contracting, and procurement of goods and services throughout the proposed project's lifespan. More details are needed, for example, will the proponent commit to establishing and tailoring specific targets or quotas for employment, contracting, and the procurement of goods/services to the capacities and interests of each affected Indigenous group?</p> <p>As mentioned elsewhere, extensive studies, including on the fit of the Project's labour and business requirement the labour and business pool of local and regional Indigenous groups, will be required and must be scoped during the Planning Phase.</p> <p>It is also not clear what measures the proponent is committing to implementing to ensure that this commitment extends throughout the over 100-year lifespan of the proposed project.</p>	No change in text. Extensive studies, including on the fit of the Project's labour and business requirement, the labour and business pool of local and regional Indigenous groups, will be required and must be scoped during the Planning Phase.	<p>Proponent to commit to working with Woodland Cree to develop a plan to maximize economic benefits for Woodland Cree. Plan to include the identification of opportunities and barriers for Woodland Cree First Nation to access economic benefits from the Project.</p> <p>Proponent to commit to working with Woodland Cree to establish and tailor specific targets or quotas for employment, contracting, and the procurement of goods/services to the capacities and interests of Woodland Cree First Nation</p>	No
4. Areas of Concern				

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<p>General;</p> <p>4.3.5 Decommissioning</p>	<p>Radiological legacy on site after decommissioning is not clearly identified - what is it? How much LLW, ILW and HLW is likely to be left on site, why, and of what type and risks?</p> <p>The Proponent plans to develop only a Preliminary Decommissioning Plan after the IA but prior to permitting. This is not acceptable to Woodland Cree, which needs to understand both high-level plans (what closure objectives, criteria, and end state zoning will the site be cleaned up to) and detailed plans for how this will be accomplished, prior to making any free, prior and informed consent decision.</p>	<p>Section 4.3.5 Decommissioning, details a “plan for a plan”, and that a Preliminary Decommissioning Plan will be drafted during early site licensing. This would mean that decommissioning plans are not considered until after the EA has finished. Accordingly, there is no information for how LLW, ILW, and HLW will be disposed of or left onsite after decommissioning.</p>	<p>Proponent to commit to completing a preliminary Decommissioning Plan before the finalization of Environmental Assessment report. The plan must be made in consultation with Woodland Cree First Nation.</p> <p>IAAC to require a draft preliminary decommissioning plan be provided as part of the EIS in TISG requirements.</p>	<p>No</p>
<p>General</p>	<p>Risk communication is a critical element of any nuclear project, especially given stigma associated with the sector. The Proponent does not identify its plans for risk communication with different and diverse audiences in the IPD. When will this information be provided? Material to assessment of impacts on TLRU, culture, Indigenous health and well-being, navigation, among other values.</p>	<p>No change to text.</p>	<p>Proponent to provide commitment and information for when and how risk communication plans will be developed with Woodland Cree prior to submission of the EIS.</p>	<p>No</p>
<p>3.2.1 Indigenous Engagement</p>	<p>The Proponent states they will respect Indigenous decision-making processes, presumably in accordance with UNDRIP. Will the proponent also respect the FPIC decision of</p>	<p>No change to text.</p>	<p>Proponent to provide written commitment and information on how they will respect Woodland Cree First Nation’s</p>	<p>No</p>

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Tools and Methods	Woodland Cree? A clear statement is required, setting out what, and how, the proponent will respect Woodland Cree's decision-making processes, and how the proponent understands the right to FPIC to work.		<p>decision-making process, including commitments to respecting Free, Prior, and Informed Consent (FPIC) prior to finalizing the EIS.</p> <p>Proponent to commit to respecting and adhering to Woodland Cree FPIC decision processes when developing the EIS.</p>	
4.2.3.2 Design Basis Earthquake	The Peace River area is an area known to have heightened seismic activity (https://ags.aer.ca/our-science/earthquakes-and-induced-seismicity/mapping-seismic-hazard-0). However, the MONARK reactor standard plan is designed based on current generic seismic data. Raises concerns if this approach will reflect the site-specific seismic risks, which are heightened as there is no detail about how the proponent will make site-specific design adjustments later on in the process.	The AP1000 Nuclear Island is designed to withstand a safe shutdown earthquake (p.4-27). It remains unclear how other project components will be adjusted to address site-specific seismic activity.	Proponent to commit to sharing early results of the site-specific seismic hazard assessment (SSSHA) with Woodland Cree and involve Woodland Cree in design decisions based on this assessment.	Partially
4.3 Activities, Infrastructure, and Physical Works	The activities in this section are a generic list, but does not include any further information about potential timing, size of areas (e.g. blasting, land clearing)	No change to text, aside from additional labour force details.	Proponent to include additional details concerning potential timing, size of areas (e.g. blasting, land clearing) etc. as part of the DPD.	No
4.3.5.1 Activities (Decommissioning)	The proponent does not mention that restoration and remediation of the site will include Indigenous groups and adhere to their goals and objectives for future land use.	As above, no change to text and not enough detail on decommissioning	Proponent to commit to co-developing and implementing decommissioning and closure plans including restoration and	No

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			<p>remediation plans with Woodland Cree First Nation.</p> <p>IAAC to require opportunities for the co-development of restoration and remediation plans with affected First Nations as part of the TISG.</p>	
<p>Figure 4.4-3: Site Cooling Water Infrastructure Diagram</p>	<p>The cooling water system process requires water from the Peace River, and the Proponent notes that to protect the Peace River water levels, water reservoirs are currently designed into the site layout. Woodland Cree is concerned that there is a lack of information on how this may affect water levels at different times of the year, and if climate change and extreme drought scenarios were carefully considered in the project design? Please provide more information on the demands on and risks to the Peace River water levels.</p>	<p>No change to text.</p>	<p>Proponent to provide detailed information in the EIS on how water will be drawn from the Peace River at different times of the year, and how this may impact overall water levels. Also provide information on how background changes to river level from drought and climate change will be considered.</p> <p>Proponent to commit to including water management as part of site design (including the size, number of, and location of reservoirs) as part of the alternative means assessment co-conducted with Woodland Cree First Nation.</p> <p>Proponent to commit to co-developing a water</p>	<p>No</p>

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			<p>management framework with Woodland Cree.</p> <p>IAAC to require climate modelling in relation to water withdrawals as part of TISG requirements.</p> <p>IAAC to require cumulative effects analysis of the Peace River as part of TISG requirements.</p>	
<p>4.4.2.3.4 Exclusion and Emergency Planning Zones</p>	<p>The Proponent states: “As the site-specific design stage progresses, the required zones for the Project are expected to be calculated, with analysis justifying their sizes, and agreed with the province of Alberta and local municipal emergency planning organizations.” Indigenous groups including Woodland Cree First Nation should also be involved in determining zones of exclusion areas, and potential exception areas for Indigenous Peoples only.</p>	<p>No change to text.</p>	<p>Proponent to commit to co-developing plans with Woodland Cree First Nation for the calculation and designation of emergency planning zones.</p>	<p>No</p>
<p>4.4.2.3.4 Exclusion and Emergency Planning Zones</p>	<p>The Proponent writes that advances in technology in the new modern reactor designs (i.e., passive and inherent safety systems) intend to “practically eliminate” risks of accidents from the reactor. With this claim, the Proponent states that “certain emergency response planning requirements would be eliminated (p. 4-24).”</p>	<p>No change to text.</p>	<p>Before declaring that modern designs allow “certain emergency response planning requirements would be eliminated (p. 4-43).”, Proponent to commit to engaging with Indigenous groups, including Woodland Cree First Nation through</p>	<p>No</p>

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	<p>The removal of emergency response planning requirements cannot be done without engaging with Indigenous groups, including Woodland Cree First Nation. While technological provisions may decrease the likelihood of accidents and malfunctions, there is still a risk that such events could occur. This risk must be addressed through meaningful dialogue on the scope and nature of emergency response planning. As such, Indigenous groups must be engaged in discussions to determine which emergency response requirements are appropriate and necessary for the project.</p> <p>Woodland Cree also notes for the record that suggesting that a reactor that has never been built to scale for purposes of generating grid power, is somehow automatically assumed to have no risk of reactor accident, cannot be credited, given the absence of a track record.</p>		<p>meaningful dialogue on the scope and nature of emergency response planning. Woodland Cree must be engaged in discussions to determine which emergency response requirements are appropriate and necessary for the project.</p> <p>IAAC to require an assessment of emergency readiness and co-development of draft emergency response plans to be included in the EIS as part of TISG requirements.</p>	
<p>4.6 Alternative Means of Carrying Out the Project</p>	<p>The Proponent states that IAAC defines alternative means, but this is incorrect. Any party can identify alternative means to be considered, and while the Proponent must consider any alternative means identified by IAAC, the Proponent is not limited to considering alternative means as defined by IAAC. It is Woodland Cree’s expectation that the Proponent will assess any alternative means identified by us, in a collaborative fashion.</p>	<p>Added text on the alternative reactor technology being considered (AP1000). The text indicates that alternatives assessment will be part of future studies/ the IA Report but lists options that are being considered.</p>	<p>Proponent must commit to undertaking a comprehensive alternatives assessment with Woodland Cree First Nation</p> <p>TISG requirements must include support for First Nation participation in alternatives assessment.</p>	<p>No</p>

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4.6.3 Alternative Workforce Accommodati on	<p>The Proponent notes that “alternatives for workforce accommodations will be a key discussion topic when engaging with Indigenous Nations and Communities (p. 4-34).” However, this has not been a discussion topic of substance to date.</p> <p>Evaluating alternatives for workforce accommodation will require a multiple accounts evaluation that should lead to a verified and agreeable outcome for Indigenous peoples. This must be done having a proper understanding of the local context as well as by considering case studies of different housing types for major construction projects.</p>	<p>As above, IPD text indicates that alternatives will be assessed in the future.</p>	<p>Proponent must commit to a comprehensive alternatives assessment with Woodland Cree First Nation.</p> <p>TISG requirements must include support for First Nation participation in alternatives assessment</p>	<p>No</p>
4.6.5 Alternative Switchyard Design	<p>The proponent notes that they are undertaking early transmission studies and connection configuration options to determine the preferred transmission connections alternatives. Once this is done, the final design, routing, and approvals will be done separately to the assessment of the proposed project.</p> <p>Woodland Cree is opposed to the transmission line not being included as part of this impact assessment, as this would be a case of project splitting, which Woodland Cree does not accept.</p>	<p>No change to text.</p>	<p>Project splitting must be avoided. The Impact assessment is to include all associated impacts from the Project.</p> <p>The Proponent and IAAC to commit to including the transmission line as part of the Project for the Impact Assessment.</p>	<p>No</p>
5.5 Cultural Resources	<p>The Proponent suggests only a Historic Resources Overview will be provided to understand the potential to impact historical resources; however Woodland Cree understands more will be necessary, likely full Stage 1 and Stage 2 Archaeological Impact</p>	<p>No change to text.</p>	<p>Proponent must commit to conducting an appropriate Historical Resource Impact Assessment (HRIA), done in close engagement with Indigenous Nations. A lack of</p>	<p>No</p>

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	Assessments will be required, in addition to immediate meaningful engagement with Indigenous Nations on this topic. More discussion on the required scope of archaeological and heritage resource assessments is required during Phase 1.		<p><i>known</i> (to Alberta) heritage resources in the Option 1 area does not mean there are none. The Option 2 area has known high paleontological resources and also will require a HRIA.</p> <p>IAAC to require an HRIA informed by Indigenous Knowledge as part of TISG requirements.</p>	
7.6.1.2 Cultural Resources	The proponent notes that heritage resources are protected by the province. This is only partially correct. In addition, Articles 11 and 31 of UNDRIP which state that Indigenous Peoples have the right to maintain and protect their own cultural heritage, including historic resources.		<p>Proponent to commit to working with Woodland Cree to assess impacts to heritage resources.</p> <p>IAAC to require an HRIA informed by Indigenous Knowledge as part of TISG requirements.</p>	No
7.7 Impacts to the Health, Social, and Economic Conditions of Indigenous Peoples	The Proponent states that “Over time, and with ongoing engagement with communities, people are expected to become more knowledgeable of nuclear energy generally, and the Project, thus becoming more comfortable living in its vicinity.” However, this is a strong and unverified assumption that more information about nuclear energy will translate into more comfort and positive associations with the project, which may not be the case for Indigenous peoples.	No change to text.	<p>Proponent must recognize and commit to working with Woodland Cree to assess and mitigate psychosocial impacts from the project through the support of a Woodland Cree First Nation-led Psychosocial impact assessment.</p> <p>IAAC to include the assessment of psychosocial impacts as part of TISG requirements.</p>	No

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	The Proponent uses evidence of generic, independent polling surveying communities near nuclear facilities and their perceptions of safety to support their claim above. However, if this was not conducted on Indigenous communities specifically, it should be removed as it is not likely applicable or relevant evidence.			
5. Process Steps and How Woodland Cree Wants to be Involved				
3.3 Engagement Tools and Methods	One of the engagement tools and methods identified by the Proponent is the “integration of Indigenous Knowledge into the assessment process in a respectful and valued manner.” However, there is no mention under Section 3.3, or throughout the IPD, of the Two-Eyed Seeing approach. This is an overarching guiding principle for collaboration with Indigenous Nations, and the Woodland Cree note that this approach should be integrated into the assessment methods.	No change to text.	Proponent commit to incorporating Two-Eyed Seeing with engagement tools to be used as a method to integrate “Indigenous Knowledge into the assessment process in a respectful and valued manner” (pg.3-3)	No
3.5 Assessments Relevant to the Report	The Proponent states that they intend on integrating Indigenous Knowledge into environmental monitoring, impact assessment, and the design of mitigation strategies. Woodland Cree notes that this phrase should be revised to clearly reflect that the use and integration of Indigenous Knowledge by the proponent is dependent on the consent of the Nation.	No change to text.	Proponent to commit to adhering to Woodland Cree’s protocols, policies and approaches for sharing Indigenous Knowledge as well as the principles of OCAP ² and follow the guiding principles within the Indigenous Knowledge Policy Framework for Project Reviews and	No

² First Nations Information Governance Centre. 2026. The First Nations Principles of OCAP. Available at: <https://fnigc.ca/ocap-training/>

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			<p>Regulatory Decisions.³ All impact assessment documents going forward must reflect that the use and integration of Indigenous Knowledge in plans, assessments, studies, monitoring, and the Impact Assessment by the proponent is dependent on the consent of the Nation.</p> <p>IAAC to ensure that TISG requirements include the protection of Indigenous Knowledge, adherence to OCAP, and direction to follow the guiding principles within IAAC's Indigenous Knowledge Policy Framework for Project Reviews and Regulatory Decisions.</p>	
3.6 Other Relevant Studies	<p>The listed studies or plans that the Proponent included do not list any plans or studies already completed by Woodland Cree. Woodland Cree would like the opportunity to provide materials to be included on several topics, including but not limited to current use</p>	No change to text.	<p>Proponent to commit to working with Woodland Cree to identify data sources (including studies led by Woodland Cree) to inform several EIS topics, including but not limited to current use of</p>	No

³ Impact Assessment Agency of Canada. 2022. Indigenous Knowledge Policy Framework for Project Reviews and Regulatory Decisions. Available at: <https://www.canada.ca/en/impact-assessment-agency/programs/aboriginal-consultation-federal-environmental-assessment/indigenous-knowledge-policy-framework-initiative/indigenous-knowledge-policy-framework-project-reviews-regulatory-decisions.html#toc7>

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	of land and resources for traditional purposes, Indigenous Knowledge, and cumulative effects.		<p>land and resources for traditional purposes, Indigenous Knowledge, and cumulative effects.</p> <p>IAAC to include direction in the TISG for the Proponent to work with affected First Nations to identify data sources for the EIS including but not limited to First Nation-led studies and document and First Nation Land Use Plans.</p>	
6. Information Gaps to be Filled				
General	Phase Zero (0) is the pre-planning phase which IAAC has recognized, and which should allow for extensive engagement between the proponent of a project and the affected Indigenous groups. Phase Zero has been recognized explicitly because IAAC has heard from Indigenous Nations that the 180 Day Phase 1 Planning process is very short - indeed largely untenable from an Indigenous perspective. The record of engagement so far suggests that the Proponent has not taken full advantage of Phase Zero as the engagement record is light, there are no agreements in place with Woodland Cree for how the assessment will be conducted and Woodland Cree's role in it, no scoping studies have been conducted with the Woodland Cree, and the identification of two alternative locations for	The Text does not address the engagement concerns raised by Woodland Cree First Nation,	Even though there was pause in Phase 1 from August 20, 2025, to March 2, 2026, during that there was no further engagement that occurred with Woodland Cree. This lack of engagement prevents Woodland Cree from being able to participate in the assessment in a meaningful way. An evaluation of readiness tool was used to assess the project. A letter was sent to IAAC showing the evaluation of Phase 0 which highlighted that the Crown, proponent, and the Nation were not ready to move into	No

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	<p>the potential project does not appear to have been fully informed through meaningful engagement with Woodland Cree. It will be difficult to impossible during the truncated Phase 1 planning process to “catch up” due to this gap created by the proponent. The problem then becomes that the Tailored Impact Statement Guidelines, which are the outcome of the short Planning Phase 1, may not be suitably detailed or focused, yet they drive the remainder of the assessment process.</p>		<p>Phase 1 as there is still a variety of preparatory work that remains incomplete or not started including funding capacity, agreement on required studies and establishment of a functional and respectful engagement process.</p>	
General	<p>Local Study Areas (LSAs) and Regional Study Areas (RSAs) are inconsistently defined and not fully supported by a rationale. The parties need to see the rationale and maps for all LSAs and RSAs for review and comment.</p>	No change to text.	<p>Proponent must commit to working with Woodland Cree to define spatial areas for assessment for all values of concern for Woodland Cree. The Proponent has not provided a rational for why the RSA is pinned at 5km, nor provided information and rational for the unstated LSA buffer. The IPD also has two different definitions for LSA (Low Specific Activity and Local Study Area), this needs to be fixed in future Project Documents to have clear definitions in the text.</p> <p>IAAC to require that spatial areas for the scope of</p>	No

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			assessment must be informed by Indigenous Knowledge.	
2.1 Project Overview	The Proponent in this section states that the plant will have 4 CANDU MONARK reactors, but elsewhere it states that there will be up to 4. Can the proponent detail what factors will influence this choice and what implications does greater or lesser reactors have for potential impacts?	Changed text to update “up to four MONARK” to “up to four large reactors” (pg. 4-53). All other references are for four reactors, as two twin units.	Proponent to clarify if there are any options for “up to four” reactor units being considered for the project, or that the only configuration being considered is four reactors configured as two twin units.	No
2.1 Project Overview	This Project is ~24 times the size of a project that would require going to IA, and the Proponent states this will provide roughly 30% of Alberta electricity needs. Can the Proponent detail what additional infrastructure may be needed to transport the electricity to markets? And what are those primary markets (e.g. oil sands or other)?	No change to text.	The Proponent must provide detailed information in the EIS on the transmission line requirements and provide information on what the projected primary markets will be (oil sands, residential, etc.). IAAC to ensure that the TISG requires that the EIS include information on transmission line requirements and potential project markets as part of the Project background.	No
2.1 Project Overview	The Proponent states that “The final decision on the site location will be made after evaluating technical and safety requirements, environmental impacts, Indigenous and social considerations.” How will these factors be weighted and scored? With whose involvement? Woodland Cree does not seem to have been involved in	Some change to text. Updated “plans to engage” to “is engaging” with Indigenous Nations. Removed that engagement will include “criteria for evaluating	Woodland Cree requests clarity on the change from engagement involvement in site evaluation, to just engaging on preferred site. Proponent to commit to robust alternative assessment	No

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	alternative siting location options and needs to be involved in any future determination of final location.	site suitability” and replaced with engagement on “site options.” (pg. 2-2).	evaluation, inclusive of siting, with Woodland Cree. IAAC to include requirement for First Nation involvement and that Indigenous Knowledge informs the Project Alternatives Assessment.	
3.1 Corporate Commitment to Engagement	The Proponent flags that they will undertake engagement for the proposed project in a manner that is consistent with regulatory guidance and best practices. The Proponent must clarify what Indigenous best practice guidance documents they are using to guide their engagement approach, as none are listed in the IPD.	No specific best practices are flagged	Proponent to commit to working with Woodland Cree to identify best practices and Woodland Cree’s preferred approach to engagement.	No
3.2.1 Indigenous Engagement Tools and Methods	The Proponent has stated they aim to have equitable economic opportunities for Indigenous groups. The Proponent first needs to understand the capacity of Woodland Cree First Nation to participate and take the most advantage of the project’s benefits, as this is a multi-decade, over \$30 billion dollar project.	IPD does not address barriers to accessing benefits.	Proponent to commit to supporting Woodland Cree to assess and mitigate barriers to accessing Project benefits and support the co-development of an economic benefit maximization plan.	No
3.2.1 Indigenous Engagement Tools and Methods	The Proponent has committed to the meaningful engagement and integration of traditional/Indigenous knowledge. However, just stating this commitment is not enough. The proponent must provide more details on how they intend to integrate traditional/Indigenous knowledge into the assessment. As part of this, the proponent must identify best practices or guidelines that	No new information provided. Only Section 5.4 describes the guidance to be used for incorporating Indigenous Knowledge into assessing changes in land use.	Proponent to commit to working with Woodland Cree to identify best practice approaches and methods to ensure that Indigenous Knowledge informs all aspects of assessment including the guiding principles within IAAC’s Indigenous Knowledge Policy	No

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	they will adhere to when integrating traditional/Indigenous knowledge. What evidence can the Proponent provide to date that they have done this either in the past or on this project?		Framework for Project Reviews and Regulatory Decisions.	
3.2.1 Indigenous Engagement Tools and Methods	The Proponent notes that they intend to prioritize in-person engagement with Indigenous Nations and communities through meetings, workshops, and site visits. The Proponent should describe what progress has been made to date in setting up these community-led engagements.	Proponent has identified concerns raised and specific next steps for engagement.	Proponent to commit to providing engagement records to Woodland Cree for verification prior to including as part of the EIS and Public Record. IAAC to ensure that the TISG requires engagement records that have been verified with affected Indigenous Groups.	Partially
3.2.1 Indigenous Engagement Tools and Methods;	The Proponent provides a list of specific tools and methods to facilitate meaningful engagement with Indigenous peoples. As written in the IPD, this reads like a 'plan for a plan', with little evidence of Nation-specific plans in place. The Proponent needs to provide additional details on each of the identified tools and methods and provide a better description of how they will be used. Woodland Cree would like to note that if Phase Zero was properly used, there would be more detailed engagement tools and methods that the Proponent could refer to in this section.	Proponent has committed to developing workplans for First Nations to participate in the preparation of the Impact Statement but detail is still lacking.	Proponent to commit to working with Woodland Cree to identify and refine preferred engagement tools and methods and to co-develop an agreed to workplan for the Project lifecycle (not only the impact assessment) recognizing that Woodland Cree is a most affected Nation. IAAC to ensure engagement tools and methods are supported by First Nations.	Partially
3.2.2 Identification	The Proponent notes in Section 3.2.5 that engagement will be based on Indigenous	The Updated IPD does not recognize Woodland	Proponent to commit to working with Woodland Cree	No

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<p>of Potentially Impacted Indigenous Nations and Communities 3.2.5 Future Indigenous Engagement Activities</p>	<p>Nations interest and degree of potential impact. Woodland Cree First Nation will be the closest community to both Option 1 and Option 2 based on ‘as a crow flies’ distance. Therefore, the Proponent should provide an explanation on how the ‘degree of potential impact’ would be calculated in both locations. Woodland Cree expects recognition by the Proponent as being a “most affected Nation” in relation to the proposed project. As such, the Proponent must provide an explanation to Woodland Cree about how it intends to adjust the scope of its engagement measures to reflect this.</p>	<p>Cree as a “Most Affected” First Nation.</p>	<p>to identify and refine preferred engagement tools and methods and to co-develop an agreed to workplan for the Project lifecycle (not only the impact assessment) recognizing that Woodland Cree is a most affected Nation.</p> <p>See Also above.</p>	
<p>3.5 Assessments Relevant to the Project</p>	<p>Not enough information is provided on Peace River cumulative effects assessment, oil sands region cumulative effects assessments, planning processes related to health, land use, etc. in north-central Alberta. More information required; not just limited to federal regional and strategic assessments.</p> <p>If considering Wood Buffalo National Park (WBNP) plans, then all plans in between Peace River and WBNP are also in play, meaning the oil sands region's studies and plans need to be listed as well, including the Strategic Environmental Assessment conducted for WBNP. This is a gap.</p>	<p>No change to text.</p>	<p>Proponent to commit to incorporating data identified by Woodland Cree pertaining to Peace River cumulative effects assessment, oil sands region cumulative effects assessments, planning processes related to health, land use, etc..</p> <p>IAAC to require consideration of all oil sands region's studies and plans including the Strategic Environmental Assessment conducted for WBNP as part of TISG requirements.</p>	<p>No</p>

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<p>4.1.1 Purpose of the Project;</p> <p>4.1.4 Value Added and Economic Growth</p>	<p>The proponent notes that the CANDU MONARK “expands existing oil sands and energy services capabilities (p. 4-1),” but the meaning and implications of this claim are not clarified in the IPD.</p> <p>More detail is needed to understand the likely flow of energy from the Project to proposed customers, including the oil sands sector. If the primary customer is the oil sands sector, then the Proponent may needs to revise some of its claims related to how the Project will beneficially impact on GHG emissions. The provision of cheaper electricity to the oil sands could increase their geographic scope, the volume of total oil extracted, and the lifespan of oil sands. This would undermine claims the Proponent has made about the project providing environmental benefits.</p> <p>An examination of spin-off industrial development associated with existing CANDU reactors in Canada necessary to understand the type of induced development likely to occur around the nuclear facility.</p>	<p>Proponent now notes that, “the Project could support the provincial and federal governments’ goal “to strengthen the ability of the western power markets to supply low carbon power to oil, LNG, critical minerals, agricultural, data centres and CCUS industries in support of their sustainability goals”(p. 4-2). The implications of these claims, however, remain unclarified.</p>	<p>Proponent to commit to including assessment of induced demand for oil sands and LNG industries as part of cumulative effects assessment and GHG emissions.</p> <p>IAAC to ensure TISG includes requirement to provide detailed information on energy customers and induced demand in Oils Sands and LNG industries.</p>	<p>No</p>
<p>4.1.4 Value Added and Economic Growth</p>	<p>The Proponent estimates there will be approximately 20,260 jobs per year during design and construction and 3,500 FTE jobs per year during operations. What data can the Proponent provide to support this estimate? And how many Indigenous peoples are estimated and targeted to be a part of the workforce?</p>	<p>Number of FTE Jobs per year during operations is no longer provided for the MONARK reactor. The AP1000 is predicted to create 12,000 FTE (p.4-4). The Proponent has not addressed the</p>	<p>Proponent to commit to including predictions for Indigenous employment as part of the proposed macroeconomic assessment for the Project and a commitment to support Woodland Cree in assessing</p>	<p>No</p>

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	Note: The summary IPD document says 3,500 FTE jobs, and the full IPD says 33,500. Assuming the latter is an error.	request for a calculation of Indigenous participation in the workforce.	barriers for accessing employment and procurement benefits from the Project.	
4.1.4 Value Added and Economic Growth (pg. 4-5)	The Proponent states that “There are also various behind-the-meter nuclear power solutions that may be considered”. When would these be detailed further and would this have any impact on the project components and activities (or size of the project footprint?)	No change to text.	Proponent to commit to transparency and provide Woodland Cree information on all potential Project design components and plans for operations.	No
4.2 Preliminary Topics of Interest	The Proponent should break down the topics of interest by Indigenous group.	Preliminary topics of interest have been updated in Table 3.2-1 but the Proponent has not broken down topics of interest by Indigenous groups nor have they indicated next steps for resolving those plans.	Proponent to commit to working with Woodland Cree to ensure that Woodland Cree priority interests and values are assessed for the preparation of the Impact Statement. IAAC to require engagement records in the EIS to be broken down by each affected First Nation as a requirement of the TISG.	No
4.3.3.2 Infrastructure - Non-Nuclear; 5.1 Proposed Location of the Project	The installation of a permanent high-voltage transmission switchyard and other interconnection infrastructure will be done during the construction process to connect the proposed project to the new 500kV provincial power transmission network. The installation of a permanent high-voltage transmission switchyard, and the connection of the proposed project to the provincial power	No Changes to Text	Proponent to commit to including the Transmission line as a Project Component to be assessed. IAAC to ensure the TISG requires the full assessment of the transmission line disclosure of information regarding the	No

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	<p>transmission network, needs to be discussed in more detail. Additionally, the provincial power transmission network needs to be included in all proposed site maps.</p> <p>Can the Proponent share information for their plans of any new required powerlines to get electricity to markets? How will they be included in the assessment? Any new transmission, connection facilities, and linear disturbances need to be assessed as part of the overall project, as they would not be built without it.</p> <p>An alternative means assessment and cumulative effects assessment including these components is critical to understanding potential impacts to Woodland Cree First Nation</p>		<p>design and proposed construction including a discussion and maps of the provincial power network.</p>	
<p>4.3.3.3 Infrastructure - Nuclear</p>	<p>The Proponent must provide evidence showing the permanent facilities for the management and storage of low-level and intermediate levels of radioactive waste, as well as for the management and storage of used fuel is:</p> <ul style="list-style-type: none"> - Capable of handling all “1 in 1000” and (in some cases) “1 in 10,000” year natural event likelihood; and - Designed with ease and completeness of decommissioning in mind to ensure that there are no residual radiological impacts during the post-closure phase of the proposed project. 	<p>No Change in Text</p>	<p>Proponent to commit to ensuring the design facilitates and providing evidence that permanent facilities for the management and storage of low-level and intermediate levels of radioactive waste, as well as for the management and storage of used fuel is:</p> <ul style="list-style-type: none"> - Capable of handling all “1 in 1000” and (in some cases) “1 in 10,000” year natural event likelihood; and 	<p>No</p>

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			- Designed with ease and completeness of decommissioning in mind to ensure that there are no residual radiological impacts during the post-closure phase of the proposed project.	
4.3.3.3 Infrastructure - Nuclear	<p>When describing the proposed nuclear infrastructure for the proposed project, the Proponent uses language suggesting that all these components will be "permanent (pp. 4-10 to 4-11)." The use of this term is highly problematic as Woodland Cree expects the Proponent to commit to removing all radiological wastes from the sites within 10 years of completion of the life cycle of the reactors. The Proponent needs to commit to providing additional details about their plans for waste removal and site decommissioning through:</p> <ul style="list-style-type: none"> - Developing a full land use and end-state study in collaboration with, and verified by, regional Indigenous groups; and - Developing a comprehensive closure plan that must be included as part of the Impact Statement. 	No Change in Text	<p>Proponent to commit to:</p> <ul style="list-style-type: none"> a. Developing a full land use and end-state study in collaboration with, and verified by, regional Indigenous groups; and b. Developing a comprehensive closure plan that must be included as part of the Impact Statement. <p>IAAC to include a full land use and end-state study as a requirement of the TISG</p> <p>IAAC to ensure the TISG requires submission of a draft closure plan and that engagement plans include co-development of the closure plan with affected First Nations.</p>	No
4.4.2.2 Plant Design	<p>Spent fuel, according to the plant design will include a storage pond "with capacity to store 10 years of spent fuel before dry fuel storage is</p>	Planned capacity for dry fuel storage remains the same for the AP1000.	<p>Proponent to commit to assessing worst case scenarios for accidents and malfunctions</p>	No

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	required". Can the Proponent detail information on potential accidents and malfunctions, including worst-case scenarios on spent fuel storage, and how the design intends to avoid or mitigate these risks?	No response provided on accidents and malfunctions for fuel storage.	concerning storage of spent fuel as part of the EIS. IAAC to include requirement to assess potential accidents and malfunctions, including worst-case scenarios on spent fuel storage, and how the design intends to avoid or mitigate these risks as part of TISG requirements.	
4.4.2.3 Site Design Data	The Peace River is a flood-prone region. Unclear why there has been no safety considerations related to flooding that have been incorporated into the site design.	The AP1000 requires less extensive water reservoirs and requires slightly less water-intake compared to the Monark (p. 4-35 and 4-36). The Proponent has also included a new section: 4.4.2.4.3 External Flooding – which provides some discussion of safety measures included in design of both the Monark and AP1000 but has not discussed worst case scenarios.	Proponent to commit to climate modelling and assessing worst case scenarios for flood conditions in the Peace River and providing evidence that site design accounts for these considerations. IAAC to ensure that TISG requires climate modelling. IAAC to ensure that TISG requires worst case flooding scenarios as part of the assessment of effects of the environment on the Project.	Partially
4.4.2.3.1 Site Cooling Water Infrastructure	The Proponent states that "Currently a mechanical draft cooling tower design is proposed, however, additional studies are being completed to confirm the best available	No change in Text	Proponent to commit to providing detailed project information on cooling options being considered and work	No

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	<p>technology and design.” Can the Proponent detail what other options are being considered at this time? How might the other options affect or change proposed project components and activities?</p>		<p>with Woodland Cree to assess alternatives.</p> <p>IAAC to ensure that all Project components, including site cooling water infrastructure is assessed as part of the alternatives assessment and is required in the TISG.</p>	
<p>4.4.2.3.1 Site Cooling Water Infrastructure</p>	<p>The Proponent notes that a “once-through cooling water system is not workable” because “it is not acceptable to return that large amount of warmer water to the Peace River (p. 4-20).”</p> <p>Can the Proponent detail how much warmer the water they return to the Peace River will be, what impacts this may have on fish and fish habitat, and when in the process water will be returned into the Peace River.</p>	<p>No Change in Text</p>	<p>Proponent to confirm whether any water will be released to the Peace River either purposely or potentially accidentally. Proponent to commit to assessing impacts from water release to the Peace River including worst case accident and malfunction scenarios.</p> <p>IAAC to ensure TISG requires assessment of impacts from release of Project water to the Peace River including worst-case accident and malfunction scenarios.</p>	<p>No</p>
<p>4.4.2.3.2 Design Basis Earthquake</p>	<p>Given the seismic activity recorded in the proposed site options, the description of the design basis earthquake provided by the Proponent is insufficient to understand whether the proposed design is appropriate for both site options. The Proponent does not</p>	<p>No Change in Text</p>	<p>Proponent to commit to sharing study terms of reference and early results of the site-specific seismic hazard assessment (SSSHA) with Woodland Cree and involve</p>	<p>No</p>

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	provide sufficient detail about the specific seismic hazard being assessed, the criteria they have used, or what design measures will be put in place to ensure that the facility will be safe in the event of an earthquake.		Woodland Cree in design decisions based on this assessment.	
4.4.2.3.4 Exclusion and Emergency Planning Zones	<p>One of the zones that the Proponent will establish around the proposed site is the 'Ingestion Planning Zone (IPZ).' This will be the zone around the site where it would be necessary to plan and prepare measures against exposure from the ingestion of radioactive material. The very name of the IPZ is likely to raise substantive risk perception among Indigenous peoples and points to the importance of culturally appropriate, science and IK-informed risk communication with Indigenous peoples should the Project proceed.</p> <p>The Proponent needs to provide information about what type of risk communication tools it plans on investing in, in collaboration with Indigenous groups. A requirement to describe in detail planned risk communication should be built into the TISG.</p>	No Change in Text	<p>Proponent to commit to co-developing risk communication tools with Woodland Cree First Nation.</p> <p>IAAC to ensure that a requirement to describe in detail planned risk communication should be built into the TISG.</p>	No
4.4.2.3.4 Exclusion and Emergency Planning Zones	The Proponent writes that "results from safety analyses (i.e., the probabilistic safety analysis) in combination with the protection strategy used by offsite planners will determine the EPZ size (p. 4-25)." However, this completely sidelines the involvement of Indigenous groups in the process of determining the EPZ size.	No Change in Text	Proponent to commit to working with Woodland Cree First Nation to define the EPZ size around the Proposed Project.	No

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	Woodland Cree, and all other affected Indigenous groups, must be involved in the process of determining the EPZ site around the proposed Project.			
4.5.1 Project Schedule	Can the Proponent share examples of reactor projects that have been cleaned up and restored to pristine conditions post-closure?	No Change in Text in this section nor has there been examples added to section 4.3.5 Decommissioning	Proponent to commit to including real world examples of best practice as part of the draft decommissioning plan. IAAC to ensure the TISG requires evidence of best practice for decommissioning plans beyond “professional experience” and require detailed information on real world examples.	No
4.5.2 Project Stages	The completion of site selection would be unrealistic by the end of 2025 as the multi-party alternative means assessment for the site selection has not been finalized. The Proponent should adjust their timelines to reflect the necessary time it would take to complete this assessment.	Section 3.2.2 Summary of Indigenous Engagement and Communication notes that siting workshops were held with First Nations in September 2025 and February 2026. Two siting workshops is not a robust approach to alternatives assessment.	Proponent to commit to a multi-party alternative means assessment with opportunity for full involvement in decision processes for Woodland Cree First Nation and other affected First Nations.	Partially
4.6 Alternative Means of Carrying out the Project	The Woodland Cree have expressed concerns about what the project will do about the river because Site C has devastated land and why is this project needed in addition to that power generating project? How is this project	No Change in Text	Proponent to commit to providing more detailed information regarding Project Purpose and economic feasibility of the Project to	No

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	different from Site C, who gets what power? Where is it going? These concerns flag both cumulative effects on the Peace River from multiple projects, and whether there is suitable demand for additional power and how it is going to be used. The Nations needs answers to these questions before assessing whether the project is an important required project.		Woodland Cree and whether there is suitable demand for additional power and how it is going to be used.	
4.6.1 Alternative Locations	The Proponent needs to clarify whether any other sites have been considered as Alternative Locations apart from Option 1 and Option 2, especially considering that it has been 16 years since Golder undertook their study.	No Change in Text	Proponent to commit to sharing all available information concerning the selection of Option 1 and 2 and a rationale for why other options were rejected. Additional information will help to inform Woodland Cree participation in the alternative means assessment.	No
4.6.1 Alternative Locations	Although the Proponent details that “a siting evaluation is underway (p. 4-33)” to assess which of the two identified locations are preferred, it is unclear how the siting process is being done. The description provided about the siting evaluation process suggests that the Proponent has primarily focused on technical feasibility and their own operational preferences. There is no mention of any consideration of Indigenous values, objectives, criteria, weighting, and scoring. The Proponent needs to confirm whether they intend to consider the aforementioned aspects to any extent in their siting evaluation.	No Change in Text	Proponent to commit to a multi-party alternative means assessment to determine siting location rather than a “siting evaluation” – the assessment must incorporate values and weighting important to Woodland Cree First Nation and other affected First Nations and informed by Indigenous Knowledge. IAAC to ensure TISG requires a robust alternative means	No

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			assessment informed by indigenous knowledge for the selection of the site location.	
4.6.6 Alternatives Waste Management	The Proponent confirms that the chosen alternative to radioactive waste management will be on-site processing and interim storage. However, no information is provided about any waste management strategies for radioactive waste. Woodland Cree would like to emphasize that no onsite waste disposal is acceptable. The IPD only states that the material will be stored on-site for the interim, but the waste would need to go to facilities outside of Alberta. It has not been clarified where the radioactive waste will be transported to for long-term storage / disposal.	No Change in Text.	Proponent to provide further information on where nuclear waste would go at the time of decommissioning if nuclear waste will be stored on-site. Proponent to commit to assessing all risks to Woodland Cree for storing radioactive material on-site during project operations including the assessment of psychosocial impacts.	No
4.7 Potential Alternatives to the Project	Did the Proponent consider geothermal as a preliminary power generation option in the potential alternatives? Please provide detail on why or why not.	No Change to Text	Proponent to commit to including analysis of geothermal energy as part of the “alternatives to” assessment to be included in the EIS. IAAC to ensure the TISG requires the inclusion of geothermal energy as part of the “Alternatives To” analysis.	No
5.2 Physical and Biological Environment Overview	The characterization of the physical and biological environment provided throughout Section 5.2 only focuses on a regional study area (RSA) that has been established around the proposed site options. However, there is	No change to text.	The Proponent must commit to working with Woodland Cree to define spatial areas for assessment for all values of concern for Woodland Cree.	No

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	<p>no rationale provided as to how the RSA was defined by the Proponent.</p> <p>Additionally, it is noted that there is no defined local study area (LSA) in the IPD. The rationale behind this is unclear and the Proponent must provide an explanation as to why they have not defined a LSA for each Valued Component.</p>			
<p>5.2.3.1 Hydrology</p>	<p>The Proponent does not mention Site C dam, which also regulates the Peace River. The Proponent is requested to confirm it will include this and its potential cumulative effects assessment of river hydrology in the IS.</p>	<p>No change to text</p>	<p>Proponent to commit to including the influence from the Site C dam on water flow and levels in the Peace River as part of the EIS hydrology assessment. Site C dam is a relatively new and significant project that will have greater influence on water levels near the project.</p> <p>IAAC to ensure the TISG requires inclusion of the Site C Dam in both the hydrology assessment and cumulative effects assessments.</p>	<p>No</p>
<p>5.3.1 Fish</p>	<p>The Proponent only includes information from the Crown and other western scientific sources but does not include any Indigenous Knowledge regarding fish and characterizing their presence and risk status and its importance to Indigenous Peoples.</p>	<p>No change to text</p>	<p>Future iterations of the Impact Assessment need to incorporate Indigenous Knowledge, in coordination with Woodland Cree First Nation and other affected First Nations that hold it. This consideration needs to be</p>	<p>No</p>

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			utilized in the characterization of fish and risk status.	
5.4.1 Traditional Land and Resource Use	The Proponent discusses following IAAC's and the Canadian Nuclear Safety Commission guidance on the inclusion of IK in the IA process. This might be a first step, but Indigenous groups must be involved in guidance and in particular need to follow IK protocols. What specific protocols is the Proponent aware of and will follow?	No change to text	Proponent to commit to developing Indigenous Knowledge protocols with Woodland Cree First Nation and other affected First Nations in the Impact Assessment process (if desired by each First Nation).	No
5.4.1 Traditional Land and Resource Use	The Proponent states that "The IPD is informed by previous IK and TLRU studies and hearing testimony provided by Indigenous Nations and Communities". Can the Proponent detail how and where specifically IK and TLRU studies were integrated into the IPD? And, what information came from Woodland Cree and was verified by Woodland Cree?	No change to text.	Proponent must work with Woodland Cree First Nation to develop a verification protocol for any "previous IK and TLRU studies and hearing testimony provided by Indigenous Nations and Communities" (pg. 5-46) intended to inform the EIS.	No
5.4.1 Traditional Land and Resource Use	The Proponent notes that it "will provide opportunities for Indigenous Nations and Communities...through submitting their own Traditional Land and Resource Use (TLRU) studies to help inform the Impact Assessment process." Woodland Cree may want to be more involved in a way that respects their own governance, not simply feeding into the Crown's IA process or the Proponent's reinterpretation of Woodland Cree's IK and TLRU. Further discussion on this and resolution prior to the end of the Planning Phase is critical.	No change to text.	Proponent to commit to working with Woodland Cree First Nation to discuss how IK and TLRU studies will inform the assessment process and determine if and how Woodland Cree would like to be engaged in a manner that respects our own governance.	No

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<p>5.4.1 Traditional Land and Resource Use</p>	<p>The Proponent states that “Building relationships with Indigenous communities ensures their knowledge informs every phase of the Impact Assessment.”</p> <p>Woodland Cree requests information on the degree that those relationships have already been built. If they are not well advanced, the Proponent should request a pause to the Planning Phase to build these relationships up.</p>	<p>No change to text.</p>	<p>Woodland Cree First Nation requests information on the degree of progress that relationships between the Proponent and Indigenous communities have already been built. If they are not well advanced, the Proponent must request an additional pause to the Planning Phase to build these relationships and apply more effort. Throughout the pause that was initiated on August 20, 2025, there was no further engagement, negotiations or finalized agreements. This lack of engagement prevents Woodland Cree from being able to participate in the assessment in a meaningful way. An evaluation of readiness was completed and highlighted that the Crown, proponent and the Nation are not ready to move into Phase 1 as there is still a variety of preparatory work that remains incomplete or not started including funding capacity, agreement on required studies and establishment of a</p>	<p>No</p>

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			functional and respectful engagement process.	
5.4.1.1 Treaty 8	The information used by the Proponent to contextualize Treaty 8 and its implications on Indigenous peoples is outdated; all the sources referenced by the proponent are over 20 years old. This section should be revised and updated with current reference sources.	No change to text.	Proponent to commit to working with Woodland Cree to ensure accurate information informs the understanding of Treaty 8 in the EIS and any other impact assessment documents discussing Treaty 8 IAAC and the Assessment Board to support Woodland Cree First Nation and other affected First Nations to conduct their own Rights Impact Assessments.	No
5.5 Cultural Resources	The section describing Cultural Resources only includes information from the province, with no discussion around Indigenous peoples IK and input into what cultural resources may be in both project area options.	No Change in Text	Proponent to commit to involving Woodland Cree in the assessment of impacts to culture and heritage resources including the incorporation of Indigenous Knowledge in the determination of areas of potential. IAAC to ensure TISG requires that Culture and Heritage assessments must be informed by Indigenous Knowledge.	No
5.6.2 Education	There is no discussion in the Education section on educational rates for Indigenous peoples,	No Change in Text	Proponent to commit to supporting Woodland Cree to	No

Section/ Page	Original WCFN Comment and Request	Adequacy of Changes in the IPD	Additional Request	Resolved?
	and if available, for Woodland Cree First Nation members specifically.		<p>collect and analyse their own data regarding education.</p> <p>IAAC to include requirement for disaggregated socioeconomic and wellbeing data for each affected First Nation.</p>	
5.6.3 Health	Proponent will have to provide a plan to deal with gaps in individual Indigenous community health data in the assessment. What is that plan?	No Change in Text	<p>Proponent to commit to supporting Woodland Cree to collect and analyse their own data regarding health including the identification of the determinants of health for Woodland Cree members.</p> <p>IAAC to include requirement for disaggregated socioeconomic and wellbeing data for each affected First Nation.</p>	No
5.6.4.4 Transportation	Nations need information on radiological and other transport risks and how much the Project during construction and operation will impact on area traffic arteries.	No Change in Text	<p>Proponent to commit to assessing impacts associated with increased traffic including but not limited to community safety and accidents risk, wildlife injury and mortality, etc. and how this may impact Indigenous peoples.</p> <p>IAAC to include requirement for assessment of traffic</p>	No

Section/ Page	Original WCFN Comment and Request	Adequacy of Changes in the IPD	Additional Request	Resolved?
			induced impacts as part of the TISG.	
5.6.5 Economy	The section on Economy does not include any information on Indigenous peoples' traditional economy (e.g. hunting, fishing) and the importance in the area, as well as Indigenous vs. non-Indigenous economy.	No Change in Text	Proponent to commit to supporting Woodland Cree to undertake their own Socio-economic study.	No
5.6.6 Labour Force	The section on Labour Force does not include any breakdown of Indigenous peoples and their employment rates and potential barriers.	No Change in Text	Proponent to commit to supporting Woodland Cree to undertake their own Socio-economic study. IAAC to include requirement for disaggregated socioeconomic and wellbeing data for each affected First Nation.	No
6.1 Federal Funding	Can the Proponent provide more detail on the following: 1) How much funding has it received from the federal government? 2) what access to capital does to proponent have otherwise?	No Change in Text	Proponent to provide to Woodland Cree the following information: 1) How much funding has it received from the federal government? 2) what access to capital does to proponent have otherwise?	No
7.1 Approach to Determining Potential Effects	Not included in Table 7.1-1 include the following project components/activities: 1. Building of electrical transmission infrastructure away from the facility; 2. Housing for workforce during construction and operations; 3. Utilization of social and physical	No change in Text	Proponent to commit to including the following as project interactions in the EIS: 1. Building of electrical transmission infrastructure away from the facility; 2.	No

Section/ Page	Original WCFN Comment and Request	Adequacy of Changes in the IPD	Additional Request	Resolved?
	<p>infrastructure by workers and businesses. These need to be integrated as Project physical works and activities.</p>		<p>Housing for workforce during construction and operations; 3. Utilization of social and physical infrastructure by workers and businesses. These need to be integrated as Project physical works and activities.</p>	
<p>7.9.2 Liquid Effluents</p>	<p>More information is needed on the specifics of the radiological effluents. Need more information on the scope of these radiological effluents, sources, management approaches, amounts, half-lives, and environmental risks. how much LLW, ILW and HLW expected; how will be managed, disposed of, nature of it? More information on doses to workers and area residents and traditional users are also required.</p>	<p>No Change in Text</p>	<p>Proponent to commit to providing detailed information to Woodland Cree on liquid effluents as part of the preparation of the impact statement and commit to assessing doses to workers and area residents and traditional users.</p> <p>IAAC to ensure TISG requires an assessment of doses to workers, area residents and traditional users including worst case scenarios.</p>	<p>No</p>
<p>7.9 Waste and Emissions</p>	<p>Tritium is identified by the Proponent as one of the main air emissions that will be emitted during the operations phase and decommissioning phase of the proposed project. Also, tritium emissions are a well-documented issue in CANDU reactors due to their use of heavy water as a coolant. There is not enough information in the IPD outlining</p>	<p>No Change in Text</p>	<p>Proponent to commit to including detailed discussion of tritium as a waste component and specific measures to be undertaken to monitor and control tritium emissions.</p>	<p>No</p>

Section/ Page	Original WCFN Comment and Request	Adequacy of Changes in the IPD	Additional Request	Resolved?
	specific measures that the Proponent will implement to monitor and control tritium emissions.			

The Following Table 2 was developed based on Proponent responses to the original summary of concerns. Section 3.2.4 Future Indigenous Engagement and Communications Activities in the updated IPD states:

“Energy Alberta will work with interested Indigenous Nations and Communities to develop work plans for participation in the Impact Statement. Work plans will be unique to each Nation and Community and will reflect areas of interest, anticipated or potential community impacts, culture and ways of knowing, and regulatory requirements. Participation in the Impact Statement could include but are not limited to, Indigenous monitors, observing data collection, reviewing data and reports, participation with technical experts on study design, development or co-development of studies and reports. Energy Alberta will provide Indigenous Nations and Communities with capacity funding to support participation” (p. 3-13).

The updated IPD does not provide any additional commitments for studies.

Table 2 Review of Proponent Response to WCFN Request for Studies

WCFN Requested Study (IPD comments pp. 9-10)	Proponent Commitment Stated in Response to Summary of Issues	Additional commitment in updated IPD?
A multi-party, multi-attribute alternative means assessment to attempt to identify a preferred location for the facility (this is an early priority in the IA).	Partial Commitment Proponent has only committed to siting workshops in 2025, with no specific details of what this look like or how this will fit into the MAE Process.	No
Woodland Cree traditional knowledge and land use baseline study, including on-territory mapping in the Project affected area.	Yes Commitment Proponent has committed to supporting Indigenous traditional knowledge and land use studies (See p. 4) but has not indicated the extent to which they will fund.	No
Woodland Cree alienation and loss of use study in the Project Case, including community preference survey work.	Uncertain Proponent has loosely committed to supporting Indigenous-led studies in general but only if “feasible” and “appropriate.” There is no specific response or mention of this kind of study in the “Response to the Summary of Issues.”	No

WCFN Requested Study (IPD comments pp. 9-10)	Proponent Commitment Stated in Response to Summary of Issues	Additional commitment in updated IPD?
Updated cumulative effects assessment work for the Peace River and related watershed.	Partial Commitment Proponent has noted they will undertake a cumulative effects assessment to support the IS but has not identified how Indigenous groups will be involved.	No
A country foods production, consumption and food security study.	Yes Commitment Proponent has committed to conducting a country foods study in collaboration with Indigenous groups (See p. 17)	No
A risk perception/psychosocial impact assessment of effects from building a nuclear power plant in our territory.	Uncertain Proponent has loosely committed to supporting Indigenous-led studies in general but only if “feasible” and “appropriate.” There is no specific response or mention of this kind of study in the “Response to the Summary of Issues.”	No
Socio-economic baseline and effects characterization study, specific to Woodland Cree.	Partial Commitment , Proponent has committed to collaborating on a socio-economic assessment (see p.4) but it is unclear if this can be Indigenous-led or even individually done on a community-by-community basis.	No
Indigenous determinants of health-based health impact assessment, not limited to a human health risk assessment.	Partial Commitment , Proponent has committed to conducting a Human Health Risk Assessment (see p. 19) and will engage Indigenous communities on the HHRA but it is unclear what this process will look like or if aspects of the assessment can be Indigenous-led.	No
Woodland Cree contributions to a GBA+ study, with emphasis on impacts on vulnerable sub-populations of economic growth and an influx of workers to the region.	Uncertain Proponent has not responded to Woodland Cree’s comments concerning GBA+ methods. Proponent has loosely committed to supporting Indigenous-led studies in general but only if “feasible” and “appropriate.”	No
Induced development scenario analysis related to other industrial activity and economic growth likely to be associated with the Project.	Uncertain Proponent has loosely committed to supporting Indigenous-led studies in general but only if “feasible” and “appropriate.” There is no specific response or mention of this kind of study in the “Response to the Summary of Issues.”	No

WCFN Requested Study (IPD comments pp. 9-10)	Proponent Commitment Stated in Response to Summary of Issues	Additional commitment in updated IPD?
Assessment of the Woodland Cree “ability to take advantage” of economic benefits associated with the Project.	Partial Commitment Proponent has committed to collaborating on a socio-economic assessment (see p.4) but it is unclear if this can be Indigenous-led or even individually done on a community-by-community basis.	No
A Land Use and End State Visioning process for whatever site is preferred (or multiple alternative sites if they are carried forward to the IA.	Uncertain. Proponent has not responded to comments and concerns regarding decommissioning. Proponent has loosely committed to supporting Indigenous-led studies in general but only if “feasible” and “appropriate.” There is no specific response or mention of this kind of study in the “Response to the Summary of Issues.”	No
Involvement in any archaeological impact assessments.	Uncertain. Proponent has not discussed archaeology in the “Response to the Summary of Issues.” And has not specifically committed to Woodland Cree involvement other than opportunities for participation in baseline field studies (does not specify the nature of field studies).	No
Woodland Cree culture and rights study to inform the required rights impact assessment under the federal IA	Partial Commitment, Proponent has committed to, “evaluating how the Project might affect the exercise of these rights and identifying measures to accommodate any impacts. Our approach will consider cultural, environmental, social, and economic factors, and evaluate how various aspects of Indigenous rights may be affected” (p. 28). Proponent has not specified methods beyond engagement. Proponent has loosely committed to supporting Indigenous-led studies in general but only if “feasible” and “appropriate.”	No