



Horse Lake First Nation IRC
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2026-05-05

Ms. Claudette Bois
Crown Consultation and Engagement Lead
Impact Assessment Agency of Canada
160 Elgin Street, 22nd Floor
Ottawa, Ontario K1A 0H3

Via Email: Claudette.Bois@iaac-aeic.gc.ca

Re: Notice of Commencement of the Integrated Assessment for the Peace River Nuclear Power Project — Horse Lake First Nation Participation

Dear Ms. Bois:

On behalf of Horse Lake First Nation (HLFN), I write to acknowledge receipt of your April 20, 2026 correspondence advising Horse Lake First Nation that the Planning Phase for the integrated assessment of the proposed Peace River Nuclear Power Project (the Project) has concluded, and that the Project has now entered the Impact Statement phase.

HLFN also acknowledges that the Impact Assessment Agency of Canada has posted the Notice of Commencement, Tailored Impact Statement Guidelines, Indigenous Engagement and Partnership Plan, Public Participation Plan, Cooperation Plan, and Permitting Plan to the Canadian Impact Assessment Registry for Registry No. 89430. Further, we further acknowledge IAAC's indication that Energy Alberta, as the proponent, must now develop its Impact Statement in a manner that satisfies the requirements of the Integrated Guidelines within the prescribed timeframe, and that IAAC and the Canadian Nuclear Safety Commission remain available to support Horse Lake First Nation throughout this phase of the integrated assessment.

a) Horse Lake First Nation's Participation in the Project Review

The Horse Lake First Nation confirms that it will participate in the assessment of the Project with a view to understanding the full range of potential effects, impacts to our rights and culture and risks to our People's health, safety and well being (and that of our neighbours) which could result from the construction and long-term operation of this unprecedented nuclear generating facility. The HLFN is also interested in other critically associated aspects that are connected to

and will make the Project possible such as the long term storage of highly toxic nuclear waste, the long term plan for removal of this toxic waste to a Deep Geological Repository (DGR) of this waste and transportation of it through our territory and the location and the impacts of the large transmission lines and power corridors through our territory to their destinations or tie in points.

The Horse Lake First Nation's participation will be grounded in its own history, rights, responsibilities, and continuing relationship with the Peace River region. As you are aware, the HLFN is a signatory to Treaty 8. Our Inherent and Treaty rights, culture, and way of life within the Treaty 8 area are protected by solemn Crown promises and by section 35 of the Constitution Act, 1982. Those rights are not historical artifacts. They are living rights that continue to be exercised by Horse Lake families and community members across their Traditional Territory and within broader Treaty 8 lands.

Horse Lake First Nation historically and extensively used the Peace River, the Peace River valley, and areas in the Project area and areas in the vicinity of the Project. The Peace River has long been an important travel corridor, harvesting area, cultural landscape, and place of cultural connection for Horse Lake families. It is also a highly important spiritual landform of great significance our Ancestors and our families to this day. The Project area cannot be understood only as a proposed industrial site. It forms part of a wider living landscape in which Horse Lake members have hunted, fished, gathered, travelled, camped, taught, visited, and carried out cultural, social, and spiritual practices over generations.

Horse Lake families and community members continue to actively utilize both sides of the Peace River, the Peace River valley sides, the bench lands above the Peace River valley, and areas in proximity to the proposed Project. These areas continue to support a range of sustenance, cultural, social, and spiritual purposes. They also remain connected to broader patterns of travel and land use that extend into the Clear Hills, the Chinchaga area, and other parts of Horse Lake First Nation's Traditional Territory.

Horse Lake First Nation is also actively supporting the development of a cultural and healing centre at its Clear Hills 152C reserve, located north of the Peace River. This centre is intended to support land-based healing, cultural teaching, youth learning, intergenerational knowledge transfer, and reconnection with lands and waters that remain important to Horse Lake people. The Clear Hills 152C reserve will provide an important base for land-based healing and cultural teaching activities extending into the Clear Hills, the Chinchaga area, and the Peace River valley.

Further, the Peace River and its flows have and remain critical to the Horse Lake First Nation's People's land based and water-based rights, our cultural identity which is intertwined and connected to the Peace River and sustained healthy water flows in the Peace River which have and still make the exercise of rights realizable and maintain a traditional way of life.

The proposed Peace River Nuclear Power Project must be assessed with these realities in mind. It is a major, precedent-setting project with a long operating life, complex technical issues, and potential implications for lands, waters, health, safety, access, wildlife, cultural continuity, and the meaningful exercise of Treaty rights. Horse Lake First Nation expects the assessment to examine not only the direct footprint of the Project, but also how the Project may affect the conditions that allow Horse Lake families to continue using and relying on the Peace River region.

Horse Lake First Nation also notes that the Government of Alberta (GOA) and the Government of Canada (GOC) has allowed extensive development across HLFN's Traditional Territory and adjacent areas over many decades. As a result, our families and members must now travel to more distant and varied places to carry out harvesting, cultural, and land-based practices. Community members report that this takes them further south, west, east, and north of the Horse Lake community, including into areas in proximity to the Project region. For example, in the fall, some members and families travel up to Peace River and into the east side of the Peace River via the "DMI" (now Mercer road). They set up camps and hunt moose, elk and deer down into and along the valley, given its relative isolation and the lower levels of development and disturbance in this area. This displacement and increased travel burden are part of the current baseline. They must not be ignored or treated as unrelated to the assessment of this Project.

b) Engagement with the Proponent and Required Capacity Support

Horse Lake First Nation has engaged, and will continue to engage, with Energy Alberta with a view to arriving at an appropriate agreement concerning engagement responsibilities, information-sharing, information-gathering, studies, technical review, community involvement, and assessment tasks to be undertaken by HLFN and in cooperation with the community.

Horse Lake First Nation understands that IAAC has offered a \$10,000 grant to support its continued participation at this stage and that contribution funding is expected to become available later in the Impact Statement phase. We are concerned that the funding currently being offered by Canada is very limited when measured against the size, complexity, and importance of this Project. Nevertheless, the Nation will accept the funding offered for the current phase of the assessment given its need to prepare and organize the community for participation in the project review.

At the same time, HLFN wishes to be clear that the funding currently identified by Canada is not sufficient to support the level of participation required for a nuclear power project of this nature. Meaningful participation will require the Nation to have reasonable access to its own Elders, Knowledge Holders, land users, youth, leadership, and technical staff. It will also require independent ecological and nuclear technical expertise, support to review highly technical information, and reasonable access to legal and regulatory advice throughout what will be a demanding and fast-paced review.

For that reason, HLFN will continue to work with Energy Alberta to reach an agreement on capacity funding that supports the Nation's participation in a manner proportionate to the scale and seriousness of the Project. Such support must allow our Nation to gather and present its own information, identify potential impacts to rights and interests, review the proponent's studies, participate in technical discussions, and provide informed recommendations to IAAC, CNSC, the proponent, and any future review body.

Horse Lake First Nation's participation should not be reduced to attendance at meetings or brief comment periods on documents prepared by others. The assessment must provide a fair opportunity for HLFN to identify what matters to its members, assess potential Project effects through its own knowledge systems and technical advisors, and influence the design, mitigation, monitoring, follow-up, and decision-making processes for the Project.

c) Closing

Horse Lake First Nation will participate in the integrated assessment of the Peace River Nuclear Power Project in good faith. It does so to protect its Treaty 8 rights, its culture, its lands and waters, and the well-being of present and future generations. At the end of the day, the HLFN takes the view that our People's consent will be required in respect to this Project and the goal of our participation is to allow our People and the HLFN government to arrive at an informed view and decision.

Horse Lake First Nation expects Canada, CNSC, IAAC, and Energy Alberta to approach this process with the seriousness required by the nature of the Project and by the Crown's obligations to Treaty 8 First Nations. Horse Lake First Nation looks forward to continued engagement with IAAC, CNSC, and Energy Alberta, and requests that IAAC provide clear next steps regarding the acceptance of the current grant funding and the anticipated timing and scope of future contribution funding.

Sincerely,

<Original signed by>

Chief Dallas Ferguson
Horse Lake First Nation

Cc:

Fatima-Zahra Timoumi, Senior Funding Officer, IAAC
Liane Chiblow, Consultation Manager, Consultation Operations Division, IAAC
Joe Ronzio, Panel Manager, Review Panels Division, IAAC

Justin McKeown, Team Leader, Indigenous Consultation and Engagement Division, CNSC
Shae Doyle, Senior Policy Officer, Indigenous Consultation and Engagement Division, CNSC

Brenda Walton, Engagement Lead, Energy Alberta

Erin Peters, Consultation Manager, Horse Lake First Nation
Casey Horseman, Industry Relations Negotiator, Horse Lake First Nation