



July 16, 2026

SENT VIA EMAIL

Energy Alberta
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Attention: Brenda Walton
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Re: Request for Pause in the Impact Statement Phase and Comments on Preliminary Workplan for the Peace River Nuclear Power Project

We write on behalf of Duncan's First Nation, Beaver First Nation, Dene Tha' First Nation, Little Red River Cree Nation, and Tallcree Tribal Government (collectively referred to as the "**Peace River First Nations**", "**Nations**", and "**PRFNs**") to formally request a pause in the Impact Statement Phase of the impact assessment for the Peace River Nuclear Power Project ("**Project**"). We also write to provide comments on Energy Alberta's Draft Impact Statement Phase Preliminary Workplan (the "**Draft Workplan**") sent to the Peace River First Nations on June 25, 2026.

Regulatory Pause

Discussion Papers

As you are aware, the federal government is considering broad regulatory changes that, if implemented, is expected to have a direct impact on the impact assessment process for the Project. These regulatory changes are overviewed in the following Discussion Papers, released on May 12, 2026:

- ["Strengthening One Canadian Economy through trade and transportation"](#); and

- [“Getting Major Projects Built in Canada – Discussion Paper on Proposed Legislative, Regulatory, and Policy Reforms”](#) (together, the “**Discussion Papers**”).

As part of the Discussion Papers, Canada is proposing removing the Impact Assessment Agency of Canada (“**IAAC**”) as the lead for nuclear projects, and transferring that authority directly to the lifecycle regulator, the Canadian Nuclear Safety Commission (“**CNSC**”).

Despite this proposed removal of IAAC from the impact assessment process, the Discussion Papers propose that consultation with Indigenous Peoples be coordinated through a Crown Consultation Hub within IAAC.

The Discussion Papers also call for “Natural Resources Canada to review Canada’s regulatory and legislative framework for nuclear projects to identify areas for improvement, including streamlining processes and reducing decision timelines.”¹

Regulatory Uncertainty

The PRFNs have expressed longstanding concerns about rushed timelines and insufficient clarity that has hindered their ability to exercise their rights and responsibilities as decision makers and participants in the impact assessment of the Project. For example, the PRFNs have repeatedly asserted that the use of a Plant Parameter Envelope creates significant uncertainty in the impact assessment process, and diminishes their ability to meaningfully understand and assess impacts of the Project and its contribution to cumulative effects, which is necessary for the Nations to provide or withhold free, prior, and informed consent for the Project.

Canada’s Discussion Papers therefore introduce an untenable degree of regulatory uncertainty to an already fraught impact assessment process. This mid-stream uncertainty means that all parties currently lack a clear roadmap and a transparent, methodologically defensible assessment process through which the PRFNs and the Crown can develop informed views, reach sound conclusions, and make reasoned decisions regarding the Project’s potential adverse impacts on the PRFNs’ inherent, Treaty, and Aboriginal rights, cultures, and ways of life.

While the PRFNs intend to make submissions as part of the public comment period for the Discussion Papers, the following is a non-exhaustive preliminary review of uncertainty created by the Discussion Papers as it relates to the Project:

- As Energy Alberta recognized in the Draft Workplan, Canada has not provided a detailed explanation of implementation plan or timeline for regulatory reforms proposed in the Discussion Papers;

¹ See [Getting Major Projects Built in Canada – Discussion Paper on Proposed Legislative, Regulatory, and Policy Reforms](#).

- Canada has not indicated the timeline for Natural Resources Canada's review of Canada's regulatory framework for nuclear projects, nor provided any clarity on whether the identification of potential avenues for streamlining nuclear projects would apply to projects already underway;
- Canada's conversion of IAAC's role from regulatory lead to mere coordinator through a Crown Consultation Hub does not build confidence that the Crown's consultation and accommodation obligations will be met, nor does it provide clarity on how coordination between the CNSC and IAAC, through its Crown Consultation Hub, would occur;
- Canada has not provided any details as to how the CNSC would have capacity to assess cumulative impacts of the Project or assess impacts to the Treaty and Aboriginal rights of the Nations;
- Canada has not explained how the proposed regulatory reforms would impact the referral of the Project to a review panel that has already occurred pursuant to section 43 of the *Impact Assessment Act*; and
- Canada has not provided notice to the PRFNs about how they would approach the revision and reissuance of the documents issued under the Planning Phase for the Project following the implementation of regulatory reforms proposed in the Discussion Papers.

Request for Pause

Due to the regulatory uncertainty imposed by Canada upon the Project, the PRFNs formally request a pause of the Impact Statement Phase until Canada has either withdrawn or implemented the regulatory changes proposed in the Discussion Papers and amended relevant Planning Phase documents.

We are requesting a regulatory pause to ensure that inflexible timelines established in the *Impact Assessment Act* and regulations are not exhausted while Canada contemplates major regulatory changes that would impact the Impact Statement Phase of the Project itself.

Draft Workplan

The PRFNs have reviewed the Workplan and understand that it is meant to act as a planning tool to support a technical review during the Impact Statement Phase, identify the activities Energy Alberta proposes to undertake, and provide an overview of the associated timing for these activities during the Impact Statement Phase.

A Collaborative Approach is Required

The PRFNs have inherent rights and responsibilities to protect our lands and waters. These inherent rights and responsibilities form the basis of the PRFNs' participation and decision-making responsibilities with regard to the Project.

The provision of the Draft Workplan by Energy Alberta solely for the PRFNs' "awareness" without opportunity for input or comment does not respect the PRFN's inherent and constitutional rights and responsibilities. By excluding the PRFNs from the development of the Draft Workplan, Energy Alberta has failed to take advantage of an opportunity for meaningful engagement with the PRFNs, and for PRFN input and collaboration in shaping the approach, timeline, and necessary steps within the Impact Statement Phase.

While the Draft Workplan does reference individual workplans with Indigenous Nations, it does not provide clarity about the scope, content, or timeline in which these will be negotiated, nor does it identify which key deliverables within the Draft Workplan are contingent upon these individual workplans have been finalized.

The PRFNs expect robust engagement and co-development of both individual workplans and the Draft Workplan through a collaborative process, which has yet to commence. The negotiation of individual workplans, both with the PRFNs and with other impacted Indigenous Nations, should occur prior to the finalization and submission of the Draft Workplan. The content and perspectives shared in individual workplan negotiations can then meaningfully inform and shape the Draft Workplan—an opportunity that is not available through Energy Alberta's current approach.

Draft Workplan Requires Actionable Detail

The Draft Workplan provided does not have the level of detail required for the PRFNs to understand how Energy Alberta intends to assess the Project's potential impacts, engage with the PRFNs, respond to and incorporate the PRFNs' outstanding and future concerns and recommendations, or make major decisions in collaboration with the PRFNs, such as site selection or the identification of impact avoidance, offset, and mitigation measures.

The Draft Workplan also fails to meaningfully consider or reference core priorities that have already been raised by the PRFNs, including:

- the need for full recognition of the PRFNs' inherent rights and responsibilities that flow from the PRFNs' role as custodians of the lands and waters, including the right to free, prior, and informed consent;
- the robust consideration of cumulative effects;
- the scoping in of transmission lines and impacts on power generation;
- the reactor technology;
- the incorporation of Indigenous Knowledge; and

- the provision of sufficient information to allow for the exercise of free, prior, and informed consent by the PRFNs.

We acknowledge that Energy Alberta may be inhibited from providing a further level of detail than what is included in the cursory, 10-page Draft Workplan due to the regulatory uncertainty described above. This does not justify proceeding on the basis of insufficiently vague workplan. Rather, it further supports PRFNs' request that the regulatory timelines be paused.

Conclusion

The Project stands to have significant and lasting impacts on the identity, way of life, economy, culture, and exercise of inherent and constitutionally-protected rights of the PRFNs, both in the near future and for generations to come. Given the significance of the Project, meaningful collaboration and clarity of process are necessary.

Requesting a regulatory pause in the Impact Statement Phase, together with collaborative efforts to co-develop and revise individual workplans and the Draft Workplan, represent good faith actions by Energy Alberta that can support the careful assessment of potential impacts of the Project to PRFN rights, interests and responsibilities, and the exercise of decision-making responsibility by the PRFNs.