



**PAPASCHASE**  
FIRST NATION BAND 136 ASSOCIATION

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September 7, 2025

**Greenlight Electricity Centre Project**

Impact Assessment Agency of Canada  
1145-9700 Jasper Avenue  
Edmonton, Alberta T5J 4C3

**Via Email:** [iaac.greenlight-electricity-centre.aeic@iaac-aeic.gc.ca](mailto:iaac.greenlight-electricity-centre.aeic@iaac-aeic.gc.ca)

**RE: Greenlight Electricity Centre Project – Comments from the Papaschase First Nation Band 136 Association (PFNB)**

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On behalf of the Papaschase First Nation Band 136 Association (PFNB), we provide the following comments on the Summary of the Initial Project Description (IPD) for the proposed Greenlight Electricity Centre Project, a natural gas facility proposed in Alberta's Industrial Heartland near Gibbons.

**1. About Papaschase**

The PFNB represents the verified descendants of the Papaschase Indian Band No. 136 and the Edmonton Stragglers, whose people have lived on and governed the lands of the Edmonton and Beaver Hills region within Treaty 6 territory for centuries, and whose names were later recorded on Treaty Pay Lists from 1876–1887. Although Canada forcibly displaced our people and illegally surrendered our reserve, we remain a Treaty 6 Nation with inherent and constitutionally protected rights. We assert governance authority through our customary law, *Wahkotowin*, and are actively reconstituting our Nation to uphold our Treaty promises.

**2. Exclusion from Early Engagement**

PFNB was not listed among the Indigenous groups identified for engagement in the Summary IPD. This exclusion is unacceptable. As rights-bearing Treaty 6 people, PFNB must be engaged from the outset of any assessment. Excluding us continues a pattern of displacement and silencing of our Nation.

PFNB requests that IAAC:

- Formally recognize PFNB as a rights-bearing Treaty 6 Nation for the purposes of this assessment;
- Add PFNB to the official consultation list for the Greenlight Electricity Centre Project;
- Require the proponent to engage directly with PFNB, including provision of project information, funding for PFNB-led reviews, and opportunities for meaningful dialogue before project decisions are made; and
- Ensure that PFNB participation is ongoing, not limited to one-time correspondence, and consistent with Canada's obligations under the *UNDRIP Act*.

### **3. Cumulative and Regional Effects**

The Summary IPD narrowly frames effects within the facility footprint. However, the project's purpose, to provide baseload electricity for Alberta and supply to data centers, will enable significant cumulative industrial expansion in the Industrial Heartland.

PFNB requests that IAAC require a cumulative effects analysis.

### **4. Impacts to Indigenous Rights and Traditional Land Use**

PFNB members continue to exercise Treaty and Aboriginal rights, including hunting, fishing, trapping, and gathering, throughout Treaty 6 territory. The Summary IPD does not describe how the proposed facility will affect access to lands and resources necessary to meaningfully exercise these rights.

PFNB requests that IAAC require the proponent to:

- Undertake site-specific Traditional Land Use (TLU) studies in direct collaboration with PFNB;
- Incorporate PFNB oral histories and Indigenous knowledge into project planning and assessment; and
- Identify and implement measures to protect access to culturally significant areas, harvesting locations, and land-based practices.

### **5. Species and Habitat Concerns**

The Summary IPD identifies wetlands, migratory bird habitat, and wildlife in the project area but does not provide sufficient detail on how these will be protected.

PFNB requests that IAAC require the proponent to include comprehensive multi-season surveys, offset and reclamation plans, and monitoring programs addressing wetlands, migratory birds, species at risk, and other sensitive habitats.

### **6. Social and Economic Impacts**

The Summary IPD refers to potential employment and economic benefits, but these claims remain broad and unsubstantiated. The absence of evidence-based projections or concrete plans undermines the credibility of the stated benefits. PFNB members have historically been excluded from the economic gains of major industrial projects in Treaty 6 territory, even as they have borne the brunt of cumulative environmental and social impacts.

PFNB requests that IAAC require the proponent to develop transparent and detailed Indigenous employment and contracting plans in collaboration with the PFNB.

### **7. Federal Oversight and UNDRIP Alignment**

As Alberta has no mandatory provincial EIA for projects of this type, federal oversight is essential. IAAC must ensure this project review is consistent with Canada's obligations under the UNDA Act, including free, prior, and informed consent.

## **8. Conclusion**

PFNB reiterates that we are a rights-bearing Treaty 6 Nation whose voice must be fully included in the federal review of the Greenlight Electricity Centre Project. The Summary IPD leaves critical gaps in relation to Indigenous engagement, impacts to Treaty rights and traditional land use, protection of species and habitats, and socio-economic benefits for Indigenous peoples.

We expect IAAC to conduct its review in a manner that is consistent with Canada's obligations under the UNDRIP Act, including the principle of free, prior, and informed consent. PFNB is prepared to work directly with IAAC and the proponent to ensure that the process respects our rights, protects our lands and waters, and creates pathways for fair and equitable participation.

Respectfully submitted,

<Original signed by>

Clayton Cunningham for  
Papaschase First Nation Band 136 Association

Cc: PFNB Chief and Council