



Consultation Department

January 26th, 2026

Impact Assessment Agency of Canada

RE: Comment on the summary of the Initial Project Description for Beacon Data Centers Heartland Project

Project Title/Name	Beacon Data Centers Heartland Project
Proponent	Heartland Power Generation LP & Northbridge Power GPC Inc. (Heartland Power)
Due	January 26, 2026

Summary

The Beacon Heartland AI Centre Project is being proposed in the St. Albert Métis District 11 of the Otipemisiwak Métis Government. This is within Métis Harvesting Area “D” as defined by Alberta’s Métis Harvesting Policy (2018) , but given it is located on private land (most of it previously disturbed), direct impacts on Métis traditional land uses from the project footprint itself are likely limited. However, the Otipemisiwak Métis Government would highlight the need for an effective cumulative effects assessment framework in the Heartland region as this and other industrial projects are being proposed. Broader impacts from electrical transmission lines, water use and discharge, noise, light, air quality, traffic and supporting infrastructure are accumulating and pose risks to habitat, wildlife and water bodies beyond the project area, and currently there is no regional planning process to address these impacts.

Background on the Otipemisiwak Métis Government

The Métis Nation within Alberta, as governed by the Otipemisiwak Métis Government, is an Indigenous nation comprising more than 73,000 registered Citizens. Having begun organizing to advance Métis self-determination and self-government in 1928, the Otipemisiwak Métis Government is the oldest continuous Métis government, and the Métis Nation within Alberta is the largest federally recognized Indigenous Nation in Canada. In 2022, the Métis Nation within Alberta voted to ratify and adopt its Constitution. This established the current Otipemisiwak Métis Government governance structures and further authorized the Otipemisiwak Métis Government to assert and advance collectively held Métis rights, claims, and interests in negotiating and arriving at agreements that advance, recognize, and respect Métis Aboriginal rights as recognized and protected under s.35 of the Canadian Constitution Act, 1982.

In 2023, the Otipemisiwak Métis Government and the Government of Canada signed an updated Métis Nation within Alberta Self-Government Recognition and Implementation Agreement which recognizes the Otipemisiwak Métis Government’s jurisdiction over its internal and core governance matters, including Citizenship, elections, and administration. It also formalizes the Otipemisiwak Métis Government as an Indigenous governing body recognized by Canada and charts a path forward to



Consultation Department

establishing an enduring nation-to-nation, government-to-government relationship with Canada through a modern-day treaty.

Per the Métis Nation within Alberta Constitution, the Métis Nation within Alberta comprises five Territories covering the entire province. These Territories are subdivided into 22 Districts to allow for more effective and localized representation. Each District has its own Citizens' Representative on the provincial Métis Citizens' Council and may have its own District Captain and Council. District Councils are empowered in the Métis Nation within Alberta Constitution to, among other things, conduct environmental monitoring, implement local programming, and oversee Crown Consultation within their District on behalf of the Métis Citizens within that District.

The Consultation Department supports the Otipemisiwak Métis Government's role in Crown consultation processes as requested by, and in collaboration with District Councils. The Consultation Department is mandated to protect and advance the collectively held rights, claims, and interests asserted by the Otipemisiwak Métis Government as the representative and governing body of the Métis within Alberta, in accordance with the Otipemisiwak Métis Government – Canada Consultation Agreement, the Métis Nation within Alberta Constitution, and relevant domestic and international legislation, regulation, and case law.

Concerns

The project area for the Beacon Heartland Data Center ("the Project") is located within our North Saskatchewan River Territory, and specifically the St. Albert Métis District 11, and within Métis Harvesting Area "D" which is utilized by thousands of Métis Citizens in and around the project area and adjacent Métis Districts.

Historically, this area was important for traditional land use, with the area surrounding the north Saskatchewan river and the mouth of the Sturgeon River being historically used by indigenous people including Métis peoples for harvesting and gathering of fish, small and large game, berries, and medicinal plants. It was a significant cultural stopping point known as the Birch Hills used by Indigenous peoples as a place for harvesting birch bark for canoes. Additionally, the location is proximal to the following:

- two major overland routes used by Métis people during the fur Trade to support fur traders in their roles as freemen, guides and interpreters
- Approximately 3.5 miles from Victoria Trail an important overland route used by Métis between Victoria settlement and Edmonton house
- Approximately 4.5 miles from the project is the Athabasca landing trail a significant overland connection to the northern territories connecting the North Saskatchewan river with the Athabasca River
- Its location is in proximity to 3 rivers: The Sturgeon River (4 miles), North Saskatchewan River (3 miles) and the Redwater Rivers (7 miles). This area was important for providing safe and



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sheltered camp sites, with ample resources for sustaining Indigenous groups as they moved through the area.

- Within 8 miles - The N.W. CO Fort Augustus (1794) was near the site on the southwest intersect of the North Saskatchewan and sturgeon river.
- 8 miles – The H.B.C. First Edmonton house (1795-1802) Built across the river from Fort Augustus

Based on the Initial Project Description, the Otipemisiwak Métis Government understands that the project is to be located on private, partially disturbed land already zoned for heavy industry, drawing water from the municipal water system. We also note that the project site is surrounded by agricultural land and other heavy industry.

While it is no challenges to exercise traditional land use activities in the project area, given private land ownership and industrial development, the Otipemisiwak Métis Government wishes to flag its historical significance. Until the early 1960's the proposed site was a Métis farm settled in the 1920's. If the IAAC deems that no federal impact assessment is required, we recommend Indigenous monitoring for any artifacts of historical and cultural value to reduce any risks to heritage resources.

The project size will also mean only minor potential socio-economic impacts, positive or negative, for Métis Citizens. We would encourage the proponent to ensure Indigenous employment and contractor requirements are put in place to benefit those nations on whose traditional territory the project will take place, including the Métis.

Cumulative Impacts

The Otipemisiwak Métis Government highlights the need for an effective cumulative effects assessment framework in the Heartland region as this and other industrial projects are being proposed. Broader impacts from electrical transmission lines, water use and discharge, noise, light, air quality, traffic and supporting infrastructure are accumulating and pose risks to habitat, wildlife and water bodies beyond the project area, and currently there is no regional planning process to address these impacts. Métis citizens in the area are also concerned about the impact to their harvesting rights if the increased traffic, infrastructure, lights and noise affect wildlife and drive it further away.

Solid baseline data and long-term environmental monitoring need to be put in place and made publicly accessible. Most importantly this data needs to be carried out in collaboration with Indigenous Governments such as the Otipemisiwak Métis Government (and specifically with Métis District Councils), and transparently integrated into effective planning and approval processes.



Consultation Department

Rights Concerns

1. The Otipemisiwak Métis Government asserts our Métis harvesters' rights under *R v Powley*, 2003 SCC 43 within this proposed development area. Additionally, the project occurs within Harvesting Area "D" of the Alberta Métis Harvesting Policy (2018), which is actively used by thousands of Métis Citizens.
2. The project area is within historical and contemporary traditional use areas which sustain our Métis citizens way of life and where collectively held rights under Section 35 are being exercised. This includes hunting and fishing areas, harvesting areas, and other land-use areas as confirmed through our records from Elders, knowledge holders, and other citizens of the Otipemisiwak Métis Government.

Closing

While the purpose of the Project is to provide grid-connected power generation for private and cultural computing services by way of a data center, it is important to consider the above-raised potential cumulative impacts.

The main benefits of the Project, as stated in the Initial Project Description, relate to its alignment of economic growth with meaningful community engagement and sustainable development. The Otipemisiwak Métis Government appreciates this focus on Indigenous community engagement and wishes to reiterate the duty of proponents and regulators to consult with the Otipemisiwak Métis Government early and effectively.



Métis Self-Government Fact Sheet

Key Take Aways

- The [Métis Nation](#)—as a distinct Indigenous People—emerged in the North-West before Canada became a country and Alberta was created. In response to Canada’s failure to recognize Métis rights and the failings of the [Métis Scrip System](#), a distinct group of Métis—the Métis Nation within Alberta—came together to represent Métis and Métis communities in Alberta.
- Today, the Métis Nation within Alberta includes: (1) over 72,000 individuals who meet the [National Definition of Métis](#) and have registered as citizens through an objectively verifiable registry (“**Citizens**”), and (2) Métis communities located throughout Alberta that are comprised of Citizens.
- Through two self-government agreements signed in [2019](#) and [2023](#), Canada has recognized [the Métis Nation within Alberta is a rights-bearing Métis collectivity](#) that holds an inherent right to self-government. Canada is also negotiating a [Treaty](#) with the Métis Nation within Alberta.
- Following the [largest ratification vote ever conducted by an Indigenous Nation in Canada](#), the Métis Nation within Alberta adopted a [Constitution](#) in [November 2022](#) with 96.9% voter approval.
- On [September 29, 2023](#), the Constitution came into effect establishing the [Otipemisiwak Métis Government](#) as the successor to the Métis Nation of Alberta. The government has four branches:
 1. **Citizens’ Gatherings** bring Citizens together to share in Métis social and cultural activities, and serve as a forum for reports, updates, and Citizen proposals.
 2. **District Councils** are the community-level governance structures of the Nation that span Alberta and are recognized and established through the Constitution.
 3. **Citizens’ Council** is the Nation’s legislative body. It also oversees the provincial, national, and international affairs of the Métis Nation with Alberta as a whole, and all other matters that are not within the mandate of District Councils.
 4. **Judicial Branch** is comprised of impartial bodies that resolve disputes in the Nation.
- Based on its unique history and evolution, the Otipemisiwak Métis Government is the oldest continuous Métis government in the Métis Nation. The Métis Nation within Alberta is the largest federally recognized Indigenous Nation in Canada.

The Métis Nation and Métis Nation Collectivities

The Métis Nation: A Distinct Indigenous People in the North-West

- As a part of the development and evolution of the fur trade in the historic North-West, [the Métis](#)—as a distinct Indigenous People—emerged. As a people, the Métis Nation shares an identity, history, language, culture, a special relationship to the land, and relationships with other Indigenous Peoples.
- The Métis Nation also shares a territory, known as the Métis Nation Homeland. This Homeland includes what is now the three Prairie provinces and extends into parts of northern Ontario, northeastern British Columbia, the Northwest Territories, and the northern United States.
- The Supreme Court—as the “[authoritative interpreter](#)” of [s. 35 of the Constitution Act, 1982](#) (“**Section 35**”)—has recognized the Métis as one of the “[Indigenous peoples who were living in the western territories](#)” prior to Canada’s westward expansion following Confederation in 1867.

The Basis for Métis Rights and Claims in the Métis Nation Homeland

- The Métis have inherent rights, recognized in the [United Nations Declaration on the Rights of Indigenous Peoples](#), because they existed as a distinct Indigenous People in the North-West before Canada became a country. This pre-existence also grounds the “existing” rights, interests, and claims of the Métis that are protected by [Section 35](#).
- Based on the honour of the Crown and Section 35, the Crown (federal and provincial) is obligated to [determine, recognize, and respect](#) Métis rights, interests, and claims.
- In 2003, in [R. v. Powley](#), the Supreme Court confirmed “[the status of Métis people as full-fledged rights-bearers](#)” and urged negotiations because the “[inclusion of the Métis in s. 35 is based on a commitment to recognizing the Métis and enhancing their survival as distinctive communities.](#)”

Métis Nation Collectivities within the Homeland

What Is an Indigenous Collectivity?

- The Métis Nation has always been more than just a site-specific settlement or a single Métis community. Like many other Indigenous Peoples (e.g., the Cree, Dene, Anishnaabe, etc.), the Métis Nation has an expansive territory and is made up of multiple Métis collectivities and communities.
- An Indigenous “collectivity” is larger than a single settlement or community; however, it may not be the entire Indigenous People. For example, while “Indian Bands” are now called “First Nations”, they are often a part of a larger Indigenous People or Nation. The Métis are similar in this respect.
- The idea of Indigenous collectivities as self-governing Nations, which may be a part of a larger Indigenous People, was explained by the [Royal Commission on Aboriginal Peoples](#) this way:

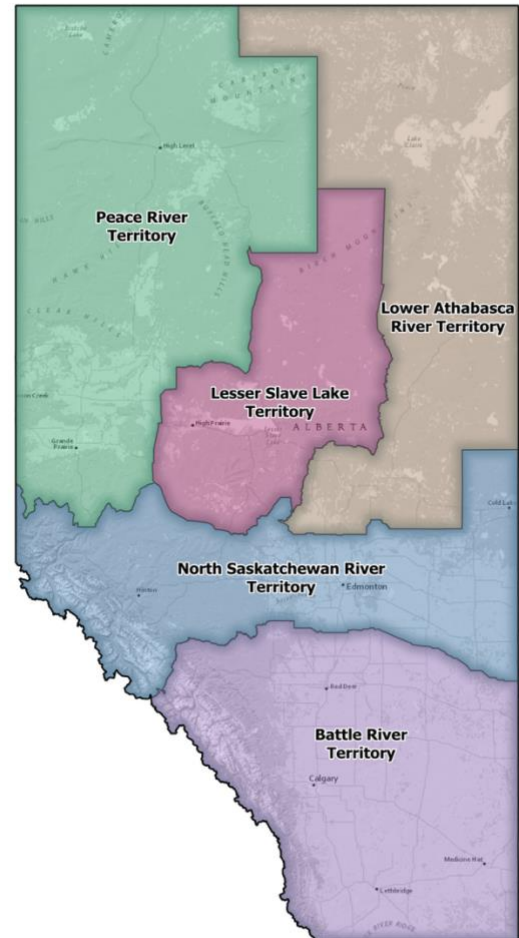
We have concluded that the right of self-government cannot reasonably be exercised by small, separate communities, whether First Nations, Inuit or Métis. It should be exercised by groups of a certain size – groups with a claim to the term ‘nation’. The problem is that the historical Aboriginal nations were undermined by disease, relocations and the full array of assimilationist government policies. They were fragmented into bands, reserves and small settlements. Only some operate as collectivities now. They will have to reconstruct themselves as nations.

- Due to externally imposed pressures such as the Métis Scrip System, Canada’s historical refusal to recognize Métis collective rights, and the imposition of provincial boundaries upon the Métis Nation, distinct Métis collectivities have reorganized (or reconstructed) themselves within the Prairie Provinces.
- To date, every Métis self-government agreement and treaty signed with Canada uses the word ‘collectivity’ because no single Métis government represents the entire Métis Nation or all Métis communities.

Métis Scrip System means the system established by Canada under its constitutional jurisdiction, responsibilities, and obligations as set out in the *Royal Proclamation of 1763*, the *Constitution Act, 1867*, and the *Rupert’s Land and North-Western Territory Order, 1870*, including the legislative authorities and grants in the *Dominion Lands Act* “[t]o satisfy any claims existing in connection with the extinguishment of the Indian title, preferred by half-breeds resident in the North-West Territories outside of the limits of Manitoba” and to “grant lands in satisfaction of claims of half-breeds arising out of the extinguishment of Indian title” and other related policies or Federal Law enacted and implemented to address Métis land related interests in the Historic Métis Nation Homeland.

- Today, the Métis Nation within Alberta is recognized by Canada as possessing the inherent right of self-government as recognized and protected by the *United Nations Declaration on the Rights of Indigenous Peoples* and Section 35. In [2019](#) and [2023](#), Canada signed legally binding [Self-Government Agreements](#) with the Métis Nation within Alberta that recognize it is a rights-bearing Métis collectivity.
- As set out in its Constitution and Self-Government Agreements, the Métis Nation within Alberta is a rights-bearing Métis collectivity that is comprised of: (1) its Citizens (*i.e.*, over 72,000 Citizens as of June 2025); and (2) Métis communities located throughout Alberta made up of its Citizens.
- The Métis Nation within Alberta spans five “Territories” that are inter-connected and inter-dependent regional Métis communities. These include:
 - Peace River Territory;
 - Lower Athabasca River Territory;
 - Lesser Slave Lake Territory;
 - North Saskatchewan River Territory; and
 - Battle River Territory.

Métis Nation within Alberta Territories



The Métis Nation within Alberta Constitution

- For generations, a Constitution had been a [missing piece](#) in the Métis Nation within Alberta’s self-government. Citizens had consistently called for a constitution to be developed in order to further unite the Métis Nation within Alberta and to advance Métis rights and self-government in Alberta.
- In November 2022, after over three years of citizen engagement, a [Constitution](#) was ratified through a province-wide vote with 96.9% voter approval. This ratification vote was the [largest ever undertaken by an Indigenous Nation in Canada](#). Following the province-wide elections for a Citizens’ Council being held in September 2023, the Constitution came into effect on [September 29, 2023](#).
- The Constitution formally established the Otipemisiwak Métis Government as the government of the Métis Nation within Alberta. It is the successor to the Métis Nation of Alberta and its predecessors, which date back to the 1920s. Based on its unique history, the Otipemisiwak Métis Government is the oldest continuous Métis Nation government in Canada.
- The Constitution sets out the Métis Nation within Alberta’s vision for self-government, the rights of the Nation and its Citizens as well as the governance structures of the Nation. It also mandates the Otipemisiwak Métis Government to negotiate and formalize a nation-to-nation, government-to-government relationship with the Crown through a modern-day treaty.

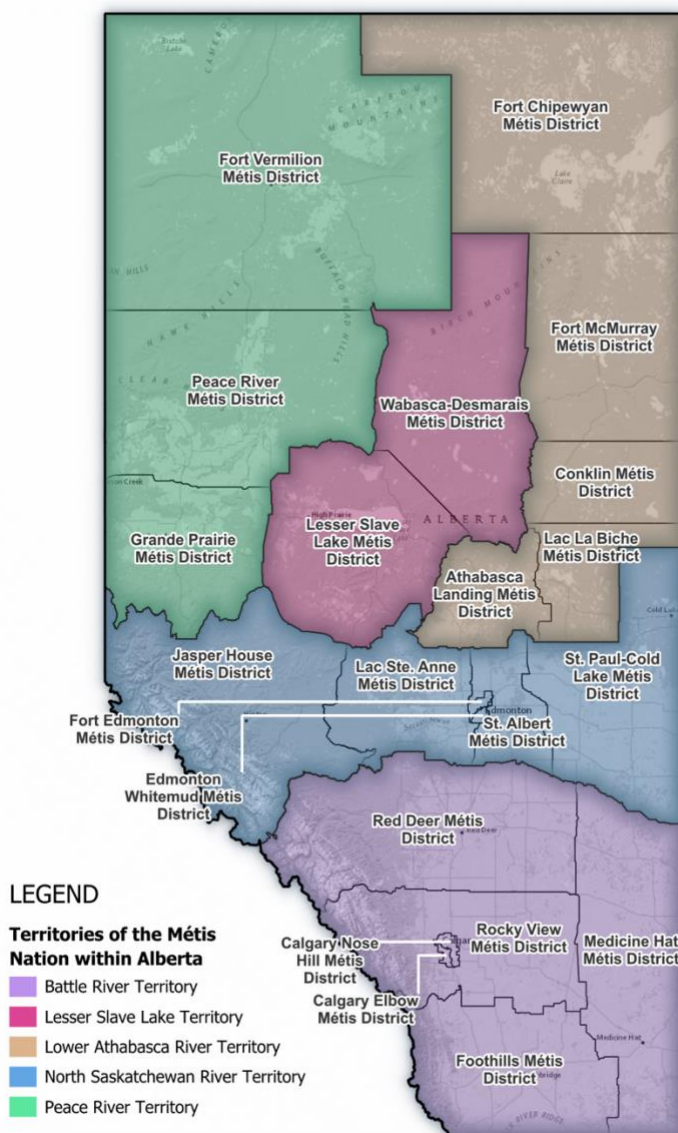
The Otipemisiwak Métis Government

Branches of the Otipemisiwak Métis Government

The Otipemisiwak Métis Government operates under a [Constitution](#) that establishes the four branches of the government:

1. **Citizens' Gatherings:** Citizens' Gatherings bring Citizens together for cultural, social, political, and spiritual activities. One is held each year in the summer and is a forum where reports are provided to Citizens and where Citizens can ask questions, provide feedback, and make proposals, consistent with [Chapter 14 of the Constitution](#). Special Citizens' Gatherings may also be called as required.
2. **District Councils:** District Councils are the community-level "governance structures" of the Métis Nation within Alberta recognized in [Chapter 15 of the Constitution](#). They represent all Citizens living in a District based on the "authority and responsibility" set out in Chapter 15. There are [22 Districts](#).

22 Métis District Councils



Each District Council is also authorized to represent the Métis communities made up of Citizens in their District based on the terms set out in the Constitution as well as their own District Council bylaws.

Each District Council is elected by Citizens over the age of sixteen (16) who reside in that District. Every Council includes a District Captain and other councillors, all of whom must be Citizens and ordinarily resident in the relevant District.

District Council responsibilities include managing the operations and finances of the District, holding community meetings, reporting to Citizens, and delivering District-specific programs and services. They are also responsible for Crown consultation and accommodation on behalf of the Métis community in a given District. In addition, District Councils may own and manage lands, assets, and businesses held by the District for the benefit of Citizens and Métis communities in the District.

Pursuant to the Constitution, each District Council has its own legal status and capacity as recognized by Métis law. Until a Self-Government Treaty is concluded with Canada where each District Council will receive its legal status and capacity through the treaty, they rely on Alberta's [Societies Act](#) to provide them with legal and administrative arm in Canadian law.

3. **Citizens' Council:** Citizens' Council is a 25-member body that is democratically elected every four years through a province-wide election. The following representatives comprise the Citizens' Council:

- a President (elected by all Citizens);
- a Women's Representative (elected by all Citizens);
- a Youth Representative (elected by all Citizens); and
- 22 Citizens' Representatives (elected by all Citizens living in the relevant District).



Citizens' Council is the Nation's legislative body with the power to enact Métis Law. It also oversees the Nation's provincial, national, and international affairs, including being mandated to negotiate a modern day treaty with Canada and deal with outstanding Métis claims (*i.e.*, Métis Scrip), being responsible to oversee the delivery of programs and services for the benefit of all Citizens, repatriating, owning, and managing land for the use and benefit of the Nation, approving an annual budget, and ensuring financial accountability to Citizens. The Constitution also assigns it with responsibility for all other matters of the Nation that do not fall within the mandates of District Councils.

The Constitution requires the President to appoint a Cabinet of Provincial Secretaries from amongst Citizens' Council. Each Secretary receives a [mandate letter](#) from the President that sets out their responsibilities. The Cabinet holds all executive authority required to oversee the operations of Nation that Citizens' Council is responsible for and to implement Métis Laws, including exercising regulatory powers under those laws.

Pursuant to the Constitution, Citizens' Council has its own legal status and capacity as recognized by Métis law. Until a Self-Government Treaty is concluded with Canada, the Nation relies on the Métis Nation of Alberta Association, which is incorporated as an entity under Alberta's [Societies Act](#), to act as its legal and administrative arm in Canadian law.

4. **Judicial Branch:** Consistent with [Chapter 17 of the Constitution](#), this branch is comprised of a [Judicial Tribunal](#) to resolve disputes within the Government and the Nation as a whole.

Officers of the Otipemisiwak Métis Government

The Otipemisiwak Métis Government has various arms-length and impartial Officers, including:

- a **Chair** who presides over all meetings of the Citizens' Council and the Citizens' Gathering based on [Chapter 22 of the Constitution](#) and the [Self-Government Act](#);
- an **Ombudsman** with authority to investigate complaints, mediate disputes, and make recommendations based on [Chapter 23 of the Constitution](#) and the [Ombudsman Act](#);
- an **Auditor General** responsible to prepare audited financial statements for the Government based on [Chapter 24 of the Constitution](#) and the [Financial Management Act](#);
- a **Chief Electoral Officer** responsible for supervising the management and conduct of elections and referenda based the [Elections and Referenda Act](#) that was adopted pursuant to [Chapter 18 of the Constitution](#);

Institutions of the Otipemisiwak Métis Government

Various [Institutions](#) that are accountable to or owned by the Nation have been established, including:

- **Education & Training:** [Rupertsland Institute](#); [Métis Education Foundation](#)
- **Business Development:** [Apeetogosan Development](#); [Pinnacle Business Services](#)
- **Culture & Tourism:** [Métis Crossing](#)
- **Housing:** [Métis Urban Housing Corporation](#); [Métis Capital Housing Corporation](#)
- **Government Real Estate:** [Métis Nation Holdings](#)

The Administration and Departments of the Otipemisiwak Métis Government

- The Administration of the Otipemisiwak Métis Government, excluding the operations of District Councils, is overseen by a **Senior Executive Officer** (“SEO”) who is responsible for managing the day-to-day operations and finances of the Nation. The SEO and the Administration operate in accordance with the Constitution as well as the laws, policies, and procedures of the government.
- The Administration includes various **Departments** that are each led by Directors who report to the SEO and support the Cabinet in their work. Currently, the Departments of the government include:
 - [Métis Identification & Registry](#)
 - [Self-Government](#)
 - [Intergovernmental Relations](#)
 - [Children & Family Services](#)
 - [Health](#)
 - [Justice](#)
 - [Communications & Citizen Engagement](#)
 - [Youth Programs & Services](#)
 - [Environment and Climate Change](#)
 - [Consultation & Accommodation](#)
 - [Finance](#)
 - [Facilities & Building Operations](#)
 - [Human Resources](#)
- In addition, each [District Council](#) may have its own administration to conduct the affairs of the District and the Métis community the District represents.

Contact Information

Citizens’ Council, Cabinet and District Councils

Contact information for Citizens’ Council and Cabinet is available [here](#).

Contact information for District Councils is available [here](#).

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