

Environmental Protection Operations Directorate
Prairie and Northern Region
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November 14, 2025

ECCC File: 4191-10-3/6353
IAAC Registry: 89430

Sent via e-mail:

Impact Assessment Agency of Canada

peacenuclear-nucleairepaix@iaac-aeic.gc.ca

RE: 89430 - Peace River Nuclear Power Project – Environment and Climate Change Canada’s specialist knowledge on Energy Alberta’s Oct 1, 2025 comments - Draft Integrated Tailored Impact Statement Guidelines

To the Impact Assessment Agency of Canada (IAAC),

Environment and Climate Change Canada (ECCC) has completed a review of Energy Alberta’s (“the Proponent”) feedback in relation to ECCC’s specialist knowledge [CIAR 89430 Ref # 325](#) on the draft Integrated Tailored Impact Statement Guidelines (draft “TISG”) for the Peace River Nuclear Power Project (the “Project”). The Proponent provided their suggestions on October 1, 2025, following a meeting that occurred on September 19, 2025, to discuss federal authorities’ advice on the draft TISG. Attendees included the Proponent, ECCC, IAAC, the Canadian Nuclear Safety Commission (CNSC), Fisheries and Oceans Canada (DFO) and Parks Canada Agency (PCA).

ECCC’s specialist knowledge is based on the department’s mandate in the context of subsection 36(3) of the *Fisheries Act*, the *Species at Risk Act*, the *Migratory Birds Convention Act, 1994*, the *Canadian Environmental Protection Act, 1999*, and their relevant regulations. ECCC comments and suggestions on the specific items raised by the Proponent is provided in the attached document.

ECCC’s line-by-line advice for each item raised by the Proponent is listed below. Energy Alberta’s submission to the associated federal authorities is included as an attachment for reference.

- **ECCC-02:** ECCC continues to recommend inclusion of the bullet in red text to ensure the baseline assessment adequately characterizes how past development of successive upstream projects along the Peace River have resulted in changes to the baseline conditions, across all relevant subsections and value components. As previously described by ECCC, baseline data for flow conditions should characterize both the natural flow conditions prior to 1968 and the regulated flow conditions since 1972. The bullets in Sections 7.2.1 and 7.4.2 do not explicitly require the Proponent to describe how these upstream projects have altered baseline conditions over time. Without this, there is a risk that the baseline will only be characterized as a snapshot of current conditions, without adequate context on how those conditions were shaped by past regulation and flow alterations. This may limit the ability to distinguish project-specific effects from broader cumulative effects and could result in information gaps in understanding hydrological and ecological baselines along the river. ECCC is available to provide additional context or guidance on baseline data and historical flow regimes to IAAC, CNSC and Energy Alberta on request.



- **ECCC-09:** Energy Alberta's response is acceptable, however ECCC recommends having a technical discussion with Energy Alberta and CNSC experts during the development of the Impact Statement (IS) to ensure the requirements for the assessment of severe weather and extreme participation are clearly understood.
- **ECCC-14:** ECCC does not have concerns with Energy Alberta's suggestion.
- **ECCC-15:** ECCC agrees with Energy Alberta's revision.
- **ECCC-16:** ECCC does not have concerns with Energy Alberta's suggestions.
- **ECCC-17:** ECCC does not have concerns with Energy Alberta's suggestions.
- **ECCC-18:** ECCC does not have concerns with Energy Alberta's suggestion in relation to the decommissioning phase. However, the criteria outlined should be included for the construction phase.
- **ECCC-19:** ECCC has no objection to the removal of the text requested by Energy Alberta but notes that a screening level model is not sufficient and that Energy Alberta should provide a rationale for the choice of air dispersion model in the Impact Statement.
- **ECCC-20:** ECCC notes that Energy Alberta's response indicates that these plans will be included during the licensing phase.
- **ECCC-28:** ECCC does not have concerns with Energy Alberta's suggestions.
- **ECCC-29:** ECCC does not have concerns with Energy Alberta's suggestion to move the text to the effects assessment (8.7.2).
- **ECCC-40:** ECCC does not have concerns with Energy Alberta's suggestions.
- **ECCC-46:** ECCC does not have concerns with Energy Alberta's suggestions.
- **ECCC-52:** ECCC is neutral to removal of the text in red, noting that the requirement should be captured in the following bullets of Section 13:
 - The Impact Statement must:
 - describe the project's climate resilience and how the impacts of climate change have been integrated into the project design and planning throughout the life of the project, following ECCC's technical guide on assessing climate change resilience;
 - identify the project's sensitivities and vulnerabilities to changes in climate (both in mean conditions and extremes such as short-duration heavy precipitation events);
- **ECCC-53:** ECCC does not have concern with Energy Alberta's suggestion to remove the reference to 'microclimate / microclimatic' but suggests this wording can be changed to 'local scale' if preferable.

- **ECCC-54:** Please see note for ECCC-09.
- **ECCC-55:** Please see note for ECCC-09

As suggested by Energy Alberta, technical workshops during the development of the Impact Statement can be used to continue discussions on how to approach specific areas of the TISG. ECCC is willing to participate and offer advice at these workshops.

Please contact Gayle Hatchard, Senior Environmental Assessment Officer at ^{<Contact information removed>} or _{<Contact information removed>} if you have any questions.

Sincerely,

<Original signed by>

Jody Small
Regional Director, Prairie and Northern Region, Environmental Protection Operations Directorate
Environment and Climate Change Canada

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Attachment(s): CA0038431-25045-R-RevA-TISG-Agency-Review-Comments_FINAL