



Alberta Wilderness Association
"Defending Wild Alberta through Awareness and Action"

Integrated Review Team for the Proposed Peace River Nuclear Power Project
Impact Assessment Agency of Canada / Government of Canada
Email: peacenuclear-nucleairepaix@iaac-aeic.gc.ca

May 14, 2025

Re: Peace River Nuclear Power Project Impact Assessment

Alberta Wilderness Association (AWA) supports the comments provided and concerns raised by the High Prairie Regional Environmental Action Committee (REAC) on the initial project description for the Peace River Nuclear Power project proposed by Energy Alberta, currently under review by the Impact Assessment Agency of Canada (IAAC) and the Canadian Nuclear Safety Commission (CNSC).

AWA is the oldest Alberta-based environmental conservation group with more than 7,500 members and supporters in Alberta and around the world. AWA seeks the completion of a protected areas network and good stewardship of Alberta's public lands, waters, and biodiversity to ensure future generations enjoy the abundant benefits they provide.

Energy Alberta is proposing the construction of two twin CANDU MONARK nuclear reactors, located approximately 30 kilometres north of the Town of Peace River, Alberta. As proposed, the Peace River Nuclear Power Project would cover 1,424 hectares in area. The proponent's estimate the project will generate up to 4,800 megawatts per year for an expected lifetime of 70 years.

REAC have outlined several concerns and provided comments related to the project, which include (but are not limited to):

- Outdated research and information inform parts of the application.
- The project provides vague discussions on the long-term waste management and volume/types of waste expected to be produced.
- Total estimated aerial and fluid emissions need to include a larger scope of pollutants.
- Emergency management protocols must be developed to consider the needs and safety of existing land-uses and communities in the region.
- Expected water demand compared to supply discussions are insufficient. More detail on proposed water treatment and use during emergencies is required.
- A lack of preparedness regarding severe accidents and infrastructure failures.
- A lack of provincial land-use planning (including exclusion and emergency zones) to inform the siting and development of the project.
- The need to fully investigate and understand the radioactivity impacts associated with the project posed to the environment and human health.

We support the studies proposed by REAC to better understand the full impacts of the project in the context of the region, including:

- Consideration of the current incident rate of industrial accidents and unplanned releases in Alberta.
- A cost-benefit comparison of existing renewable energy technologies including rooftop solar, horizontal and vertical access wind turbines, and run-of-river hydropower as alternatives to the proposed project.
- An investigation of the cumulative impacts of anthropogenic activities on seismic activity in the region, in relation to the project.
- An estimation of the water requirements and usage during both normal operations and severe accidents, and an investigation into impacts on downstream watersheds.
- An examination of the prevalence (increase/decrease) of nuclear infrastructure involvement in terrorism and/or war.
- The potential health effects of living near a nuclear reactor (50km, 100km, 200 km, 300 km).

The federal government has an obligation to comprehensively review the impacts of large, designated projects to ensure that all environmental, social, health, and economic factors have been fully considered before proceeding. IAAC acknowledges in the invitation to comment that “public involvement is at the core of the integrated assessment process”, and as an environmental charity with extensive local knowledge and experience in the region, it is essential REAC’s concerns and comments are fully considered and addressed throughout the integrated assessment process.

Sincerely,



Kennedy Halvorson
Conservation Specialist
Alberta Wilderness Association
cs1@abwild.ca