Lakeland Métis Nation Association
P.O. Box 929
Lac La Biche, AB T0A 2C0
Email: contact@lakelandmetis.ca

March 25, 2026 *Sent Via Email*

Impact Assessment Agency of Canada/
Government of Canada

and

Government of Alberta

Re: Canada–Alberta "One Project, One Review" Cooperation Agreement for Impact Assessment of Major Projects.

Dear Sir/Madam,

On behalf of the Lakeland Métis Nation (LMN)**,** we are writing to provide comments on the proposed Canada–Alberta cooperation agreement establishing a "one project, one review" approach for major project impact assessments.

LMN is a distinct and independent Métis Nation in northeastern Alberta, currently undergoing the Métis credible assertion process. LMN is not currently formally recognized by the federal government**,** nor is it affiliated with the Métis Nation of Alberta. Despite this, LMN members have long-standing connections to the lands and waters within the Athabasca region and continue to exercise their Section 35 rights, including harvesting, fishing, and land use practices that are deeply tied to culture, identity, and community well-being.

LMN has been formally organized since 2011 and is actively engaged in the Métis credible assertion process with the Province of Alberta. However, despite numerous submissions and Statements of Concern, LMN has never been granted standing before the Alberta Energy Regulator (AER). This ongoing lack of recognition and procedural inclusion demonstrates a clear gap in existing provincial processes, where rights-bearing Métis communities may be excluded from meaningful participation. This context is directly relevant to the proposed agreement, as increased reliance on provincial systems risks reinforcing and entrenching these existing barriers to inclusion.

LMN supports efforts to improve coordination and reduce duplication in impact assessment processes. However, this must not come at the expense of Indigenous rights, meaningful consultation, or the integrity of impact assessment.

LMN conditionally supports the concept of "one project, one review," provided that federal responsibilities for Section 35 rights protection are fully maintained, Indigenous consultation is not delegated or diminished, all rights-bearing Indigenous communities are

included regardless of recognition status, and impact assessment processes remain rigorous, transparent, and rights-based. LMN does not support any approach that results in the substitution of federal oversight with provincial processes where this would weaken protections for Indigenous rights.

LMN has significant concerns regarding the potential reduction of federal oversight. The proposed agreement allows for federal reliance on, or substitution of, provincial assessment processes. This raises the risk of weakening the federal government's constitutional obligations under Section 35 and diminishing its responsibility to uphold the Crown's duty to consult and accommodate. These responsibilities must not be delegated or reduced through this agreement.

LMN is also concerned about Indigenous consultation, recognition, and inclusion. The agreement indicates that Canada may rely on Alberta's consultation processes. As LMN is not currently federally recognized, there is a significant risk that LMN may be excluded or inconsistently included in consultation processes. Reliance on provincial systems may further limit inclusion, as recognition criteria vary. This creates a structural gap where rights-bearing communities may not be adequately consulted, and the Crown's duty to consult may not be meaningfully fulfilled. Consultation must be nation-to-nation, distinctions-based, inclusive of non-federally recognized Indigenous communities, and supported with adequate capacity funding.

While LMN recognizes the intent to improve efficiency, shortened timelines may limit the ability to conduct meaningful engagement and reduce the time available for communities to review and respond. Efficiency must not compromise the quality or depth of assessment or undermine the Crown's duty to consult.

LMN is further concerned with increased reliance on provincial processes. Provincial systems are often structured around regulatory efficiency and may not fully reflect federal obligations to Indigenous peoples. A cooperative approach must not result in the downloading of federal responsibilities or reduced accountability to Indigenous communities.

To address these concerns, LMN recommends that the federal government retain final responsibility for Section 35 rights and the duty to consult and accommodate, and that substitution of federal processes not be the default approach. The agreement must explicitly ensure inclusion of all rights-bearing Indigenous communities, including non-federally recognized Nations such as LMN, and apply a rights-based approach rather than a recognition-based filter. Indigenous consultation must be strengthened through early, ongoing, and adequately resourced engagement, with recognition of distinct Indigenous governance structures, including Métis Nations. Finally, the process must maintain rigorous assessment standards, transparency, and accountability, and avoid timelines that restrict meaningful Indigenous participation.

Lakeland Métis Nation Association
P.O. Box 929
Lac La Biche, AB T0A 2C0
Email: contact@lakelandmetis.ca

In conclusion, while LMN supports improved coordination in impact assessment processes, the proposed "one project, one review" approach must not result in reduced federal accountability, weakened Indigenous consultation, or the exclusion of non-federally recognized but rights-bearing Indigenous communities. Meaningful participation in these processes is essential to protecting LMN rights, culture, and way of life.

We appreciate the opportunity to provide input and look forward to continued engagement on this matter.

Signed,

Melina Power
President & CEO
Lakeland Métis Nation