



**CMD 26-M13.24**

Date: 2026-04-16

**Written Submission from  
Creative Fire LP | Des Nedhe Group**

**Mémoire de  
Creative Fire LP | Des Nedhe Group**

In the matter of the

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**Mid-term update from BWXT Nuclear  
Energy Canada Inc. on licensed activities  
at its Toronto and Peterborough facilities**

**Mise à jour de mi-parcours sur les  
activités autorisées de BWXT Nuclear  
Energy Canada Inc. à ses installations de  
Toronto et de Peterborough**

**Commission Meeting**

**Réunion de la Commission**

May 2026

Mai 2026

## WRITTEN SUBMISSION

Submitted to the Commission Panel in the Matter of

### BWXT NUCLEAR ENERGY CANADA — COMPREHENSIVE MID-TERM REVIEW

Toronto and Peterborough Nuclear Fuel Facilities

Commission Public Meeting — May 2026

**Submitted by:** Creative Fire LP | Des Nedhe Group

**Contact:** Paula Ward, Business and Engagement Strategist - [pward@creative-fire.com](mailto:pward@creative-fire.com)

**Date:** April 16, 2026

<b>Meeting Date:</b>	Week of May 25 2026
<b>Submission Date:</b>	April 16, 2026
<b>Proceeding:</b>	BWXT Nuclear Energy Canada Mid-Term Review — May 2026
<b>Submitted by:</b>	Creative Fire LP   Des Nedhe Group

This submission is made in English only. / Cette soumission est rédigée en anglais seulement.

### 1.0 INTRODUCTION

Creative Fire LP (Creative Fire) is an Indigenous-owned and operated consulting firm and member of Des Nedhe Group, an enterprise owned by English River First Nation. We write to the Commission Panel in respect of the May 2026 comprehensive mid-term review of the operating licenses held by BWXT Nuclear Energy Canada Inc. (BWXT) for its Toronto and Peterborough Class IB nuclear fuel facilities.

Creative Fire has been retained by BWXT to support the development and implementation of its Indigenous Relations Roadmap. We offer this submission in our capacity as an independent Indigenous advisory firm retained to support that work, not as a Rightsholder or community with a direct interest in the lands and waters near BWXT's facilities. Our perspective is that of an external professional observer, and our comments are limited to what we have directly observed during our engagement with BWXT on its Indigenous relations practice.

### 2.0 ABOUT CREATIVE FIRE

Creative Fire provides strategic advisory services to corporations, governments, and institutions across Canada. Our practice areas include Indigenous procurement, community engagement, communications and consultation, Truth and Reconciliation planning, and Indigenous relations strategy. As a member of Des Nedhe Group, we bring lived experience and professional expertise alongside sustained relationships with Indigenous Nations and communities across the country.



## 3.0 OUR WORK WITH BWXT CANADA

Creative Fire was retained by BWXT to develop a structured Indigenous Relations Roadmap to guide the company's approach to relationship-building with Indigenous Nations and communities near its Toronto and Peterborough operations.

Our work has included a review of the regional treaty landscape relevant to both facilities and site-specific analysis to identify rights-holders, treaty contexts, and community interests. The Peterborough facility sits within Treaty 20 Michi Saagiig territory and the traditional territory of the Williams Treaties First Nations, and we have supported engagement Indigenous Nations in relation to BWXT's Cambridge operations, including with Six Nations of the Grand River. Each of these contexts carries distinct treaty histories and rights considerations, and the Roadmap has been developed with that site-by-site differentiation in mind.

The Roadmap is being developed in alignment with Canada's obligations under the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP) and the Truth and Reconciliation Commission's Calls to Action. To date, the work has included supporting BWXT in establishing concrete relationship-building practices with Nations, including facilitating site and facility tours to support community understanding of operations, exploring the development of formal relationship agreements, and identifying shared objectives such as environmental monitoring participation and traditional land use mapping. These are the types of practices that move a company's Indigenous relations work from policy commitments on paper toward accountable, community-facing action.

## 4.0 OBSERVATIONS ON BWXT'S APPROACH

Creative Fire offers the following observations based on our direct experience working with BWXT:

**Organizational commitment.** BWXT has engaged in this process with clear organizational intent. Senior leadership has been involved and receptive to independent guidance, including areas where past practice warranted review. The decision to commission a comprehensive Roadmap reflects a considered investment in improving the company's Indigenous relations practice.

**Rigour in foundational analysis.** BWXT has supported a thorough review of the treaty and rights landscape relevant to its facilities. This kind of foundational work is essential to developing engagement approaches that are credible and appropriate to each Nation's specific context, and BWXT has been willing to invest the time and resources required to do it properly.

**Focus on long-term relationship-building.** BWXT has expressed clear interest in building relationships with Indigenous Nations that extend beyond project-specific or regulatory timelines. The Roadmap is structured to support that goal by establishing ongoing engagement processes, points of accountability, and mechanisms for review and improvement over time.

## 5.0 RECOMMENDATIONS TO THE COMMISSION PANEL

Creative Fire respectfully offers the following for the Commission Panel's consideration:

**5.1 Recognize proactive investment in Indigenous relations as a performance indicator.** BWXT has taken steps beyond minimum regulatory requirements by retaining independent Indigenous advisory support and continuing a comprehensive review of its engagement practice. The Commission's performance assessment framework should reflect the value of this kind of proactive investment.

**5.2 Reinforce the standard for Nation-specific engagement.** The Commission should continue to signal to licensees that engagement planning must account for the distinct treaty rights, governance structures,



and priorities of each Nation. Creative Fire's work with BWXT has been grounded in that standard, and we encourage the Commission to maintain it as a clear expectation for the sector.

**5.3 Monitor Roadmap implementation as part of ongoing oversight.** We encourage the Commission to track BWXT's progress in implementing its Indigenous Relations Roadmap commitments through its ongoing compliance and oversight activities. Documenting progress over the remaining license period would provide a useful baseline for future review and support continuity across licensing cycles.

## 6.0 CONCLUSION

Creative Fire welcomes the opportunity to provide this submission and appreciates the Commission Panel's consideration of our perspective. We remain committed to supporting BWXT in building relationships with Indigenous Nations that are grounded in respect, accountability, and a genuine understanding of the rights and interests at stake. We are available to respond to any questions the Panel may have.

Respectfully submitted,



**Paula Ward**

Business and Engagement Strategist

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Creative Fire LP | Des Nedhe Group

April 16, 2026

