

Detailed summary of technical comments on the 2026 draft Standards and Guidelines and changes made by MCM in response to technical comments

Theme	MCM Rationale for Updates	ERO Comments	Changes made to the draft 2026 Standards and Guidelines in response to ERO feedback
New standards for temporary avoidance and protection of archaeological sites (partial clearance)	- Streamline the partial clearance process for clarity and efficiency. - Provide better protection for archaeological sites.	- Clarify difference between temporary and long-term protection buffers. - Concerns with 50m protective buffers. - Clarify when documentation from landowners and/or approval authorities are required.	Minor edits made to clarify intent and improve understanding. MCM will provide template letter for landowners to assist LCAs with to documentation requirements. MCM will provide further guidance to support interpretation and understanding.
New standards for limited small-scale impacts (limited assessments)	- Allows project areas to be determined by extent of impacts (parts of properties). - No additional burden on approval authorities.	- Concern about more burden on approval authorities. - Request to include public bodies (not just private landowners).	Minor edits made to improve understanding and intent of changes. Includes removing reference that specified private ownership from the relevant standards. MCM to provide further guidance to support interpretation and understanding.
New standards for linear corridors	- Allows for linear corridor project areas (that are not part of formal development applications) to be limited to areas of impact. - No change to how project areas are determined for EAs and other formal processes.	- Concerns related to 20m width - Not inline with EAs and other processes	New standards have been removed to be considered further. MCM to consider changes to address linear corridors as part of potential future reviews and updates to the Standards and Guidelines.
Moving the optional Stage 1 property inspection to Stage 2.	- Address inefficiency in current process. - Address lack of clear standards for method and documentation. - No intention to remove ability to complete inspections early in the process.	- Concerns that removing this option will result in increased recommendations for Stage 2 assessments. - Removes ability to assess potential early in the process, particularly in Northern Ontario.	Retained "optional" inspection in Stage 1. Included new inspection standards in Stage 2 to address poor compliance and achieve improved and reliable methods for fieldwork and documentation.
Removal of Section 2.1, Standard 2.e. (exempt lands from survey where all lands are formally prohibited from alteration)	- Removed as it is no longer applicable. - Removal does not require public bodies to accept transfer of unassessed lands.	Misunderstanding that this places more burden on public bodies (that municipalities are required to accept transfer of the unassessed lands).	No change made. MCM to provide further guidance to support interpretation and understanding.
Determining limits of archaeological sites after Stage 2.	Related to streamlining the partial clearance process.	Concerns about all artifacts within 20m of each other being	No change made. MCM to provide further guidance to support interpretation and understanding.

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	Formalizes an existing practice.	included in the same site.	
Administrative changes	- Formalize existing practices. - Update for relevance.	- Comments requesting clarity regarding some proposed administrative changes. - Particular concern with test pit survey intensification requirement. - Minimal concerns related to other administrative changes (e.g. removal of reference to matters beyond MCMs mandate: for example health and safety legislation, Forest Management Plan). - Requests for additional changes that go beyond current proposed changes.	Only change was to revise updates made to test pit survey intensification. MCM to provide further guidance to support interpretation and understanding.
Definitions: limited assessments and partial clearances	- Updates to accommodate limited assessments and partial clearances: 'project area' and 'property' were updated and 'linear corridor' was added to support the 'limited assessment' updates. - Definitions were added for 'protected area' and 'protected buffer' and 'public body' to implement the updated standards for partial clearances.	- ERO comments restricted to definitions for project area, property, and linear corridor. - Mostly related to misunderstanding the intention and application.	No changes made, except for removing the definition of "linear corridor". MCM to provide further guidance to support interpretation and understanding.
Definitions: "Archaeological Resources"	Removal of "archaeological resources" and "findspots" (not defined under the OHA) in favour of "artifacts" and "archaeological sites" (both defined under the OHA) aligns terminology in the document with legislated terminology to eliminate ambiguity and support the proposed 'partial clearance' updates.	Concerns/misunderstanding that this change leads to more work (e.g. that all sites will require Stage 3).	No changes made. MCM to provide further guidance to support interpretation and understanding.

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Definitions: other changes	• Changes to support clarity in their application. • Definition of 'stratigraphy' was updated. This is a common archaeological term used for defining soil profiles. • The term "inspection" was added to the glossary as it was missing but used throughout both the 2011 and updated 2026 S&G documents.	• Minimal comments related to these updates to the glossary. • Requests to add additional definitions.	No changes made. Adding definitions to the glossary may be considered as part of potential future reviews and updates to the Standards and Guidelines.