



528 Bathurst Street Toronto, Ontario M5S 2P9  
416-966-1069 F 416-966-9723 asiheritage.ca

May 1, 2025

The Honourable Graham McGregor  
Minister of Citizenship and Multiculturalism  
14th Floor, 56 Wellesley St W  
Toronto, Ontario M7A 2E7

**RE: Proposed Bill 5, Schedule 7. Archaeology is not red tape.**

Dear Minister McGregor,

We are submitting this letter on behalf of the concerned staff and leadership of Archaeological Services Inc. (ASI) in response to the request for comment on proposed updates to the Ontario Heritage Act in Bill 5, Schedule 7.

ASI has been a proudly Ontario-owned and run business for 45 years. From our headquarters in Toronto and Burlington we mobilize hundreds of staff across the Province.

ASI supports the Province's notion to defend the sovereignty of Canada through initiatives that will protect and grow our economy. But is the province really willing to destroy Ontario's heritage in pursuit of this sovereignty? In its current form Bill 5 will enable the destruction of Indigenous and Settler heritage.

Archaeological requirements are not red tape. Good archaeology does not have to cause delays and should be viewed as an asset to any project. When brought in early, archaeologists can employ sophisticated predictive modelling and screening techniques to help avoid and protect critical archaeological sites.

Instead, we request that the province view archaeological requirements as a tangible way to ensure all citizens of Ontario can benefit from these priority projects. We live and build upon lands that have witnessed thousands of years of human occupation. The Indigenous people who lived here for at least 13,000 years before settler occupation, have left a non-renewable legacy for all Ontarians to learn from. Indeed, Ontario Canada would not exist at all without Indigenous communities who helped stave off American expansionism during the War of 1812. Settlers have added to this archaeological legacy since the early 1600s.

Surely the Province would prefer to have support from all descendant communities for these priority projects and especially to have Indigenous leaders as allies in the threat to our sovereignty. We need to learn from past lessons. Indigenous participation and community support are key to the future of

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Ontario. Ensuring archaeology has an important voice in a project – rather than remove it all together – is the only path forward.

We therefore ask the Province to reconsider its proposal to exempt provincial priority projects from archaeological requirements. A more proactive and constructive approach to addressing any perceived concerns about “efficiency” or “delay” would be seeking measures whereby the Province can improve its own internal regulatory and review operations as they relate to archaeology.

Sincerely,

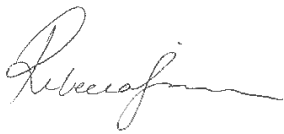
**Owners and Principals, Archaeological Services Inc.**




Robert MacDonald



Lisa Merritt



Rebecca Sciarra



Katherine Hull



David Robertson



Andrew Riddle