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PARADISE
DEVELOPMENTS®

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Ministry of Citizenship and Multiculturalism

56 Wellesley Street West,
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Toronto, Ontario
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**Re: ERO: 026 - 0216
PARADISE DEVELOPMENTS
HERITAGE FRAMEWORK TRANSFORMATION: PROPOSALS RELATED TO ONTARIO'S
ARCHAEOLOGY PROGRAM, INCLUDING TARGETED CHANGES TO THE STANDARDS AND
GUIDELINES FOR CONSULTANT ARCHAEOLOGISTS**

Please consider our submission in regards to the Province's ERO 026 - 0216 posting, titled, "Heritage Framework Transformation: Proposals Related To Ontario's Archaeology Program, Including Targeted Changes To The Standards And Guidelines For Consultant Archaeologists."

By way of introduction, Paradise Developments is celebrating its 54th year in the Home Building and Land Development industry in Ontario, and we remain very active in the municipal and provincial planning process, developing not only residential land but also commercial space. Since the Company's inception in 1972, we have developed and constructed in excess of fifteen thousand units of residential across the province. Our portfolio exists largely within the GTA, but is far reaching, encompassing holdings from Hamilton to Whitby, up to Barrie.

We are an active member in BILD and several large Landowner Groups, who are in agreement with the ongoing issues regarding the MCM's review and Approval process of archaeological assessments in Ontario.

While we support and commend the efforts and actions being taken by the Government of Ontario in attempting to streamline and clean up processes relating to the filing of archaeological studies we do have some specific comments and ideas that we believe will help address the very sluggish and often arduous process facing developers submitting Archaeological reports for ministerial review and acceptance prior to the development of our properties. Our suggestions can reduce friction, tighten timelines, open dialogue and increase clarity, while also ensuring that there is proper oversight for this critical work, introducing more transparency.

Our four primary comments are as follows:

1. **Stage 1 and Stage 2 Reports Should be Directly Filed to the Registry.** In Ontario, Archaeologists are licenced individuals who are professionally and legally responsible for their reports, and thus follow strict legal structures and guidelines. As such, it is completely reasonable that a Stage 1 and Stage 2 assessment can be filed directly to the Registry without a requirement for review and approval by Provincial officials. Legal onus is on the Archaeologist, and deliberate failure to follow the legal and professional requirements in undertaking their work and in the preparation of their reports exposes them to direct liability, which ultimately could lead to the suits and forfeiture of their licence. We believe this is more than adequate protection.
 - a. **Occasional Audit of Stage 1 and Stage 2 Reports.** Further, should there need to be an extra level of accountability introduced to the process, it would not be unfair to, on occasion, randomly select a small percentage of reports for audit to ensure quality. This will keep tension in the system and the quality of reporting high.
2. **Set Firm Report Review Timelines and Expectations.** Should the current system of Provincial review be maintained for Stage 3 and 4 Reports only, a new and clear set of timelines needs to be adopted which will set expectations for review and comment for submissions. Municipal and Federal Governments both commonly use this approach and it works. Further, we believe a set of standard review and comment timelines should be developed in consultation with the industry for Stage 3 and 4 Assessments regardless of the outcome of the Stage 1 and 2 Assessments. We recommend the following:
 - 60 days for initial comments
 - 30 days for review of a revised report/approval
3. **Ministry Reviewers to Deliver a Single, Comprehensive, Set of Comments.** The ERO posting discusses the desire to reduce ‘multiple rounds of reports’, which we agree with, however, we believe it could be strengthened to limit comments back from the Ministry to one single, comprehensive set. Doing so would prevent the Acceptance of an Assessment from becoming a moving target, often burning several months, or even years.
4. **Improve Communication and Transparency.** Matters that were previously resolved efficiently through direct dialogue, (whether in meetings or by phone call), are now addressed exclusively through written correspondence. This shift has significantly impaired communication, with straightforward questions that once took minutes to resolve, now requiring weeks or months to reach a conclusion. This is the type of delay plaguing the industry, driving out timelines and increasing costs.

We fully support the objective of streamlining land use planning approvals, cutting red tape, and getting shovels in the ground more quickly and efficiently. As an industry, we are here to support the Government in developing policy that will facilitate these goals while not compromising public interest. As such, and most importantly, we would like to suggest that the Government introduce a consultation process with the industry and consulting Archaeologists to work through process improvements and settle on an approach that works for everyone. We believe the industry as a whole would embrace this.

Thank you very kindly for your attention to this matter.

A handwritten signature in blue ink, appearing to read 'Mitch', with a stylized flourish.

Mitchell Taleski
Director, Land Development