



April 5, 2026

Ministry of Citizenship and Multiculturalism
Submitted via ERO

Re: Heritage Framework Transformation (ERO 026-0216)

Chippewas of the Thames First Nation (COTTFN), also known as Deshkan Zibiing, is an Anishinaabe First Nation whose territory extends throughout southwestern Ontario, including land covered by several pre-Confederation treaties. COTTFN is actively involved in protecting the Nation's cultural heritage through an archaeological field liaison program and has previously participated in discussions around the heritage framework.

The short timeline for these proposals is unacceptable and does not constitute consultation with First Nations. We were invited to virtual information sessions with one week's notice. As other participants on the webinar noted, the Ministry has not provided direct responses to previously submitted comments. These proposals do not address the main concerns raised by First Nations, including mandatory engagement early in the assessment process as well as substantive decision-making authority for First Nations. Given timing and capacity constraints, we are unable to provide a fully informed response to these specific proposals. It appears that there has been insufficient engagement with archaeologists as well, who have raised pertinent concerns about how the changes may conflict with other municipal and provincial processes. Why are certain changes being rushed through now after the 2026 season already started?

While we have not had sufficient time to conduct a comprehensive review of the proposals, we would like to comment on some of the topics. For limited assessments, it is important that areas still requiring archaeological assessments are clearly mapped and that First Nations have access to that mapping.

On compliance, the Ministry should be strengthening compliance tools and transparency around good and bad practices in the sector. In addition to the criteria listed on the ERO posting, complaints specifically from First Nations should be strongly considered in evaluating compliance records. First Nations should also receive specific, transparent, and timely follow up after raising concerns about the stewardship of their own cultural heritage. In addition to compliance, we welcome requirements for archaeologists to receive training on Indigenous cultural protocols and engagement best practices.

We intend to comment on some of the other proposals included in the HTF process. These proposals must include a longer timeframe for engagement as well as additional capacity funding.

Consultation Unit
Treaties, Lands and Environment

