

April 2, 2026

Attn: Ministry of Citizenship and Multiculturalism

ERO Number: 025-0216

Organization: City of Kitchener

The City of Kitchener appreciates the opportunity to comment on the proposed updates to the Standards and Guidelines for Consultant Archaeologists.

New Standards for ‘Limited Assessments’ (assessments of parts of properties)

Kitchener does not object to the introduction of new or additional standards for delineating exceptions. However, the proposed standards refer only to privately owned lands. In many development applications, portions of these lands are intended to be dedicated or transferred to a public body, such as the City of Kitchener.

Where an exception delineation request proposes to exclude lands that will become publicly owned, the receiving public body should be formally consulted. These lands would otherwise require archaeological evaluation, and municipalities assume long-term responsibility for their stewardship.

Kitchener requests that the Province clarify that public bodies must be consulted when delineation requests involve lands proposed for future dedication or transfer.