

Heritage Framework Transformation: Proposals related to Ontario's Archaeology Program, including targeted changes to the Standards and Guidelines for Consultant Archaeologists

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The proposed updates to the Standards and Guidelines for Consultant Archaeologists (S&Gs) Draft 2026 **should not** be implemented as they currently stand.

I am not opposed to changes to the 2011 S&Gs; in fact these revisions are long overdue. However, the current 2026 draft fails to address the core issues facing our profession and does not align with the legislation that triggers archaeological assessments.

Professional archaeologists and Indigenous communities have called for updates to the S&Gs since its inception in 2011. It is therefore incomprehensible that only a 30-day review period was provided. Furthermore, attempting to implement these changes for the 2026 field season, when the draft was only released in February, is a recipe for operational disaster.

Changes I Support:

- Limited Assessments
 - The idea of allowing for limited or scoped assessments is a good idea as it will allow for reduced assessments, the mechanism for how these are to happen is not feasible
 - However, the proposed mechanism—requiring unassessed portions of properties to be transferred to public bodies—is impractical. Municipalities simply do not have the resources to manage these transfers.

Change I Do Not Support:

- Lack of consultation with Indigenous Communities
 - It is clear that concerns raised by Indigenous communities during the consultation process were not incorporated into the 2026 draft.
 - Indigenous engagement should be mandatory at all stages of archaeological assessment.
- Lack of consultation with professional archaeologists
 - Many professional archaeologists have been providing feedback regarding the 2011 S&Gs over the past 14 years, but none of these comments or recommendations have been considered
- Proposed changes to Stage 1 assessments
 - Removing site visits from Stage 1 assessments will render them essentially ineffective, as areas of archaeological potential cannot be properly documented. This will increase the need for Stage 2 assessments, slowing down processes and raising costs for municipalities and developers.
 - The removal of site visits also creates inconsistencies with other legislation and processes, including MCEAs, the Planning Act, and detailed design requirements.

I strongly urge the Ministry to pause implementation of the 2026 S&Gs until meaningful consultation with Indigenous communities and professional archaeologists has taken place. This is essential to ensure that the proposed changes genuinely reduce red tape without compromising the integrity of archaeological assessments.