

Dear Heritage Framework Transformation Team,

The members of the Ontario Marine Heritage Committee strongly advocate for the protection and proper recording of archaeological sites. We appreciate the basic foundation that the *Ontario Heritage Act* and current *Standards and Guidelines for Consultant Archaeologists (2011)* have established within the planning and construction of infrastructure and development projects. We also agree that the Standards and the processes built around it require an update that is to the benefit of all involved in the process. However, the current update does not consider any of the feedback or concerns that the OMHC has provided to the Ministry over the past decade, or any of the feedback and concerns we have heard voiced by Indigenous communities and First Nations, and other archaeological committees. We are disappointed that the current proposal was not shared more widely prior to the posting of this ERO, to engage in a space for constructive consultation and feedback. The current timeline does not allow for the various affected groups to share and compile their knowledge into an update to archaeological procedure that can lead to meaningful change.

For example, we have concerns about the complete lack of change regarding the standard of archaeology conducted on Marine sites. The OMHC has plenty of suggestions that will help create consistency for these assessments, but this posting has not allowed for a proper conversation. We are also concerned about the proposed changes to the Stage 1 process and removal of the site visit, which puts the new standards in direct conflict with existing processes and legislation outside of the APU.

We urge the Heritage Framework Transformation team to reconsider the document's deployment and request that these proposed changes to the Standards and Guidelines for Consultant Archaeologists are not implemented until they have been sufficiently workshopped with archaeology industry professionals and Indigenous communities and First Nations.

The OMHC is committed to working with the HFT team to implement strategic changes that will be beneficial to Indigenous communities and First Nations, proponents, and archaeologists.

Sincerely,
OMHC Executive Board

