



ASSOCIATION OF PROFESSIONAL
ARCHAEOLOGISTS (Ontario)

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Working to Promote Professionalism in Ontario Archaeology

August 4, 2023

The Honourable Steve Clark
Ministry of Municipal Affairs and Housing
13th Floor, 777 Bay Street
Toronto, Ontario M7A 2J3

Re: A Place to Grow and Provincial Policy Statement, 2023

Dear Minister Clark,

The Ontario Association of Professional Archaeologists (APA) would like to provide the following comments on the proposed 2023 updates to the Places to Grow Act and the Provincial Policy Statement (ERO Number 019-6813).

While we support the strong wording in the proposed policy statement regarding the protection of cultural heritage resources and we agree with the overarching need for newly built residential housing within Ontario, the APA has three comments regarding the proposed language and definitions contained within the statement. The APA is specifically concerned with the language under Section 4.6, namely:

1. The APA requests that statements be updated to clarify and emphasize that lands containing previously unidentified archaeological resources shall be conserved in the same manner as lands with known and protected archaeological resources. The proposed policy statement contains language declaring the need to conserve archaeological resources and cultural heritage landscapes on protected heritage properties (Section 4.6.1) and the requirement that development and land alteration activity on lands containing archaeological resources or with archaeological potential can only proceed once those resources have been conserved (Section 4.6.2.) However, it is not clear within either statement that lands containing unidentified archaeological resources will be subject to rigorous archaeological survey methods to identify those resources and evaluate their cultural heritage value or interest.
2. While the APA lauds the proposed policy statements that encourage municipalities to develop archaeological management plans (Section 4.6.4) and requires that municipalities engage with Indigenous communities early in the process of identifying, protecting, and conserving archaeological resources (Section 4.6.5), we emphasize that there needs to be responsible multi-party oversight of these processes.
3. The language throughout Section 4.6 emphasizes the need to conserve archaeological resources where "conserve" is defined as "the identification, protection, management and use of built heritage resources, cultural heritage landscapes and archaeological resources in a manner that ensures their cultural heritage value or interest is retained." While the definition includes mitigative measures, we request that language be clarified to ensure that the definition of "conserve" includes the protection of archaeological resources through excavation and curation of those resources or through Avoidance and Protection of archaeological resources (see *MCM Standards and Guidelines for Consultant Archaeologists*, 2011).

Furthermore, as a major organization representing the archaeological profession within Ontario, the APA requests that the Ministry engage directly with our organization throughout the process of updating the provincial policy statement and in all future legislation that has the capacity to significantly affect the

archaeological process within Ontario. Our members work on archaeological assessments triggered by land development throughout the province of Ontario and are collectively involved in hundreds of archaeological projects every year. We kindly request that the APA be informed by the Ministry in advance of any future policy proposals that have the capacity to significantly alter the process of archaeological assessment within the province so that we have the opportunity to meet with Ministry staff early in the proposal process.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jordan Downey', with a stylized flourish at the end.

Jordan Downey,
Director of Investigations, APA (Ontario)

Authorized by the Executive of the Association of Professional Archaeologists (Ontario)

Cc: Laura McRae, President, APA (Ontario)

Cc: Lawrence Jackson, Vice President, APA (Ontario)