



ASSOCIATION OF PROFESSIONAL ARCHAEOLOGISTS
(Ontario)

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Working to Promote Professionalism in Ontario Archaeology

March 21, 2024

Comments regarding the “Get It Done Act” Bill 162/Official Plan Adjustments (ERO 019-8273)

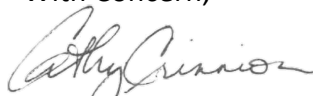
The period for comment on such an important series of issues is unacceptably short.

First and foremost, time must be given for the province to engage meaningfully with Indigenous Peoples. It would appear that the Ontario government is pursuing a mandate that drastically reduces its obligations for the Duty to Consult. Consultations with Indigenous Peoples must happen in a clear, meaningful and respectful manner. Amendments to legislation relating to municipal official plans must not contravene the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP) (2007), particularly with respect to Articles 19 and 32. Ontario’s municipal official plans must be crafted in such a way that they account for Treaty agreements and traditional Indigenous territories and rights, while balancing municipal citizen’s concerns about environmental protection, climate change, services and other amenities.

Official Plan Adjustments must take into account that municipalities are approval authorities for matters relating to the Ontario Heritage Act. The processes of “streamlining” approvals and “Getting It Done” must not contravene the law with respect to the Ontario Heritage Act. Impacts to undiscovered archaeological sites and burials (Indigenous and Settlers) through construction activities that have not undergone adequate assessments and full consultation are subject to fines of up to \$1,000,000 under the Heritage Act. Land use changes and construction activities that cause destruction to environmental and heritage resources are often irreversible. To remove protections in the name of getting housing/urban sprawl moving at a faster pace is short-sighted and will result in major delays, cost overruns, and create irreparable harm to the relationship that the government has tried to build for decades with Indigenous communities in Ontario, particularly when environmentally responsible and sustainable urban planning solutions exist.

The APA is an association of professional archaeologists, aligned specialists, and Indigenous people working towards the protection and celebration of their heritage landscapes. Indigenous communities need to be heard, and the archaeological and heritage assessments that identify and protect Indigenous and Settler resources must be supported. Ontario needs the planning process to be strengthened, and development goals cannot be given priority above all else. APA and its First Nation colleagues will object to any amendments that weaken the legislation.

With Concern,



Cathy Crinnion

Administrative Secretary, on behalf of the Executive and Members of APA (Ontario)

cc: Chief Taynor Simpson, Alderville First Nation
Lorieann Whittaker, Policy Analyst, Anishinabek Nation