



ASSOCIATION OF PROFESSIONAL
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Working to Promote Professionalism in Ontario Archaeology

May 5, 2023

The Honourable David Piccini
Minister of the Environment, Conservation and Parks
5th Floor, 777 Bay Street
Toronto, Ontario M7A 2J3

To: Ministry of the Environment

Re: EA Modernization – Comprehensive EAs – Notification Letter

Dear Minister,

The Ontario Association of Professional Archaeologists supports the concerns of the Anishinabek Nation regarding the proposed EA Modernization – Comprehensive EAs – Notification Letter. As emphasized by Policy Analyst Lorieann Whittaker, the proposed Streamlined EA process carries significant risks to the environment and to cultural heritage resources. Our organization has not received any request for input from the Ministry of the Environment despite a large number of our members working on archaeological assessments on projects triggered under the EA process. We would especially like to be involved in any discussions or decisions about updating government “codes of practice” much as the Anishinabek Nation wishes to be consulted and involved.

Revoking the current Municipal Class EA process and amending the Act and Regulations should follow due process. Transitional provisions to permit proponents to withdraw from the current process are inappropriately to take place before Act and Regulations amendments are actually approved. The existing Municipal Class EA for roadwork, for instance, is already inadequate for protection of archaeological sites since proponents are only required to assess to the limits of construction. Sites of Indigenous cultural heritage and

significance adjacent to roadways are at risk of associated damage and destruction. Allowing a freeway or expressway of any length to be subject to streamlined EA process creates additional risks to Indigenous heritage.

As noted by Policy Analyst Lorieann Whittaker, the streamlined EA process will not result in a project-specific approval and binding conditions nor will the public be allowed to petition to shift a project from Streamlined to Comprehensive EA Process when specific risks have been identified. Similarly, removal of public ability to request referring a Streamlined EA project to the Ontario Land Tribunal is a major removal of democratic rights and freedoms for all peoples in Ontario.

Please open up the proposed changes and amendments to proper public consultation, including First Nations of Ontario, and those directly affected Professions such as archaeological consulting.

Thank you.

Sincerely,



Lawrence Jackson, Ph.D.

Vice-President, Ontario Association of Professional Archaeologists

cc: Lorieann Whittaker, Anishinabek Nation
Chief Dave Mowat, Alderville First Nation
Chief Lori Carr, Alderville First Nation
Chief Keith Knott, Curve Lake First Nation
Chief Kelly La Rocca, Mississaugas of Scugog Island First Nation