

Sent by email to: graham.mcgregor@ontario.ca

December 11, 2025

The Honourable Graham McGregor
Minister of Citizenship and Multiculturalism
56 Wellesley Street West, 14th Floor
Toronto, ON M7A 2E7

Dear Minister McGregor,

The Association of Municipalities of Ontario (AMO) commends the province for responding to calls to protect Indigenous rights and taking steps to ensure that Indigenous communities are involved in decisions about the proposed archaeology exemption criteria regulation under the *Ontario Heritage Act*. We strongly support the calls of Indigenous communities for a framework that protects treaty rights, archaeological heritage and burial sites. At the same time, we understand the outcomes that the province is seeking to accomplish with the proposed regulation: faster approvals and an expedited path to construction starts. Municipalities also share this goal.

Municipalities are working hard to build meaningful, collaborative relationships with Indigenous communities. These relationships help maintain building healthy, prosperous communities while advancing reconciliation. The proposed exemptions may put municipal decision makers in the position of having to consider development projects that have been exempted from archaeological assessment against the wishes of local Indigenous communities. This introduces a risk of breaking apart relationships that municipalities and Indigenous communities have been working very hard to build.

We recommend that in addition to collaborating with Indigenous communities to find the right balance between exemptions and protection, you consider investing in resources to support thorough and timely risk-assessment and archaeological assessments. For example, increased resources for archaeological mapping in areas that have not been adequately studied, or for completion of heritage studies that build on Indigenous knowledge of where heritage and archaeological sites are likely to be found.

AMO is pleased to stand with Indigenous communities to protect heritage and advance economic reconciliation while supporting the province's goal of strengthening economic resilience. These goals do not need to be mutually exclusive. AMO would welcome the opportunity to work with you and Indigenous partners to create a successful archaeological heritage framework that serves all these objectives.

Sincerely,



Robin Jones

President, Association of Municipalities of Ontario (AMO)

Mayor of the Village of Westport

cc: The Honourable Rob Flack, Minister of Municipal Affairs and Housing
The Honourable Greg Rickford, Minister of Indigenous Affairs and First Nations
Economic Reconciliation
Nosa Ero-Brown, Deputy Minister, Ministry of Citizenship and Multiculturalism
Martha Greenberg, Deputy Minister, Ministry of Municipal Affairs and Housing
Raj Dhir, Deputy Minister, Ministry of Indigenous Affairs and First Nations Economic
Reconciliation