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An Investigation into the Curation of Archaeological Collections in Cultural Resource Management in Ontario, Canada

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A thesis submitted in partial fulfillment of the requirements for the Master of Arts degree in Anthropology

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Abstract

This study aims to investigate why and how there is a “curation crisis” in Ontario archaeology by examining the delegation of responsibility for archaeological collections. This research was conducted by reviewing related scholarly literature, investigating the current legislation governing Ontario archaeology, and interviewing 20 stakeholders involved in archaeological collections management, including Cultural Resource Management (CRM) archaeologists, descendant community representatives, past Ministry of Heritage, Sport, Tourism, and Culture Industries employees, academic and avocational archaeologists, and museum or repository curators. Nearly all participants think CRM archaeologists should not be responsible for the long-term curation of archaeological collections, yet many of Ontario’s archaeological collections are in the private storage spaces of CRM consultants. The study concludes that it would be most beneficial if the responsibility for long-term care of archaeological collections was transferred to well-equipped repositories, either run by, or in collaboration with, Indigenous communities and overseen by the Ministry of Heritage, Sport, Tourism and Culture Industries.

Keywords

Ontario archaeology, archaeological collections management, heritage policy, curation crisis

Summary for Lay Audience

Many archaeological sites exist across Ontario that are related to the European colonial period and, more often, Indigenous history before and during the colonial period. Before construction projects can begin in Ontario, it is often required that an archaeological assessment is conducted before development is started. These assessments may lead to extensive archaeological surveys and excavations to salvage archaeological sites, artifacts, and information before they are destroyed by development. The assessments are completed by archaeologists who are licensed and regulated by the Ministry of Heritage, Sport, Tourism and Culture Industries. The archaeologists are required to provide safekeeping for the artifacts they collect under their licenses, or they may transfer them to an approved artifact repository with the approval of the Minister of Heritage, Sport, Tourism and Culture Industries. With the boom in development in Ontario beginning in the 1980s and 1990s, archaeological collections began to be amassed at much faster rates than ever before. Due to the rapid pace of development, budget constraints, and little time and money dedicated to artifact curation, licensed archaeologists have sometimes stored collections in less-than-ideal conditions in their basements, garages, and storage lockers. In these storage conditions, collections are difficult to track and access for further study and are at risk of deteriorating. In some worst-case scenarios, collections have become lost or thrown away. This has led some stakeholders to conclude that Ontario is now in an archaeological “curation crisis” because collections are being acquired faster than they can be properly curated.

This study aims to investigate this “curation crisis” by determining the delegation of responsibility for archaeological collections in the province. This research was conducted by reviewing related scholarly literature, investigating the current legislation regarding Ontario archaeology, and interviewing 20 stakeholders involved in archaeological collections. The stakeholders include licensed archaeologists, descendant community representatives, past Ministry of Heritage, Sport, Tourism, and Culture Industries employees, academic and avocational archaeologists, and curators. Nearly all participants think licensed archaeologists should be relieved of the long-term curation of archaeological collections, yet most collections currently remain in licensed archaeologists’ private storage. The study concludes that it would be more beneficial if the responsibility for curating archaeological collections was delegated to well-equipped repositories, either run by or in collaboration with Indigenous communities, with additional regulation by the Ministry of Heritage, Sport, Tourism and Culture Industries.

Acknowledgments

First, I am deeply thankful to everyone who participated in this study, without whom this research would not have been possible. Listening to everyone's passionate experiences and opinions about Ontario archaeology was extremely enlightening and I feel lucky to have met each person.

I am extremely grateful to my supervisor Dr. Peter Timmins for dedicating so much of his time and expertise into this project. I also appreciate his patience during many of my technical difficulties in our online meetings. Thank you to my advisor Dr. Neal Ferris for pointing me in the right direction at the beginning of this study. To the Anthropology department and our cohort, thank you for making my time at Western University such a fun and unforgettable experience. Also, thank you for being tremendously supportive during the COVID-19 pandemic.

I want to give thanks to two friends who uplifted me during my time working on this project. Thank you to my good friend Irene Paibulsirijit for all our adventures as roommates. Special thanks to my wonderful friend Shane O'Grady whose wit and humour always livens up the conversation.

Finally, I am immensely appreciative of having my family's endless care and support. I would like to thank my grandparents, Ross and Sandra Mann who I dearly miss, and who together helped inspire me to pursue history and archaeology. Most especially, a huge thank you my parents, Peter and Stacey Mann for their unconditional love and encouragement every step of the way.

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Chapter 1

1 Introduction and Background

The inspiration for my thesis topic began the first time I read the *Standards and Guidelines for Consultant Archaeologists* (MTC, 2011). I noticed that Cultural Resource Management (CRM) archaeologists had an extensive procedure outlined for surveys and excavations, but few guidelines for archaeological collections management. This initial curiosity led me to discover the term “curation crisis,” and inspired me to dedicate my thesis to investigating why and how there was a possible “crisis” in Ontario archaeology. My approach included reviewing Ontario’s current legislation and regulations related to the curation of archaeological collections and consulting scholarly research regarding archaeological collections management. I also interviewed 20 stakeholders involved in archaeological collections including CRM archaeologists, descendant community representatives, past Ministry of Heritage, Sport, Tourism, and Culture Industries (“the Ministry”) employees, academic and avocational archaeologists, and curators. The key question this thesis aims to investigate is: Who is obligated to be responsible for archaeological collections in Ontario and how should this responsibility be delegated?

1.1 Definitions

There are three definitions that are important to first establish: archaeological collections, curation, and policy. Archaeological collections are not solely the physical artifacts themselves; they also include the associated documents and records which contain the original context from where the artifacts were found (Karrow, 2016, 9). Curation is the task of taking care of these archaeological collections over the long term, also referred to as stewardship. This means not only cleaning, cataloguing and properly storing collections, but also making data accessible through means such as publication (Karrow, 2016, 9; Kersel, 2015, 42). Making collections accessible allows the potential for future research and is thus an extension of a collection's potential meaning (Ferris et al., 2018, 6).

Policy in Ontario heritage planning and archaeology is complex because it affects both the private and public sector. Private organizations are entitled to maintain their own procedures and rules, thus have their own specific policies, whereas public policies can be seen as upholding the basis or foundation of a specified field by bringing state power to address conflicts. The definition of policy this paper will adopt is: "policy as mobilizing a particular set of values through, in theory, a system of instrumental rationality underpinned by legitimate authority. It aims to enable stable and predictable approaches to particular goals" (Waterton and Watson, 2015, 427). In the case of private policy, private organizations are the authority that implements the instruments and upholds a set of values. With public policy, that authoritative body is administered through government bureaucracy (Waterton and Watson, 2015, 427). For example, a CRM consulting firm is required to follow the policies and regulations published by the Ministry, but they are also entitled to implement their own private policies and procedures that are based on their own morals and judgments.

1.2 Consultant Archaeology & Current Policy

The emergence of the CRM industry in Ontario has an evolution worthy of its own thesis paper. To recount very briefly, a growing interest in archaeology had emerged in Ontario by the early 1970's, raising concern for the conservation of heritage in the province. This resulted in the *Ontario Heritage Act* ("the Act") being established in 1974 (Ferris, 2002, 57). The Act introduced an archaeological licensing system overseen by the Ministry of Culture and Recreation, (now the Ministry of Heritage, Sport, Tourism, and Culture Industries) and acknowledged that archaeological conservation was an interest of the province (Ferris, 2002, 58). Legislative action continued to emerge between 1975 to 1985 to protect sites from bulldozers and development (Willems, 2007 80; Ferris, 2002, 59). This included *the Environmental Assessment Act* in 1975, which vaguely addressed conservation of heritage buildings and opened the door to the inclusion of archaeological concerns (Ferris 2002, 60). Heritage protection policies would be further elaborated with the *Planning Act* in 1982 which stated that development under the private sector required assessments for heritage and archaeological potential (Willems, 2007, 80; Ferris, 2002, 60-63). In order to fulfill these requirements, licensed archaeologists formed consultant companies that began to perform surveys and excavations to salvage the archaeological data from these sites prior to development. As Ontario's private development sector began to bloom in the 1980s and 1990's, so did the CRM industry and Ontario's archaeological collections (Ferris, 2002, 60-62; Karrow, 2017, 8; Birch, 2006, 8; Uchiyama, 2015; 1). The industry manages and extracts valued resources for the public and descendant communities, and is entangled in "archaeological research, regional and project

planning, archaeological heritage stewardship, professional ethics, and multiple contemporary pressures” (Welch and Ferris, 2014, 98).

As a result, most archaeology in Ontario is now conducted privately through the CRM industry by consultant archaeologists who are licensed by the Ministry as required by the Heritage Act (Birch, 2006, 14; Welch and Ferris; 2014; 95). The success of CRM has shifted archaeological practitioners from academia into archaeological services for the development sector, as these proponent-sponsored practitioners make up 80 to 90 percent of archaeologists (Welch and Ferris, 2014, 95). There are three levels of archaeological license: avocational, applied research, and professional. All three of these licenses allow for the recovery of artifacts (MHSTCI, n.d.a). All licensees are required to follow the *Terms and Conditions for Archaeological Licenses* issued by the Ministry (MTCS, 1990). These terms outline the obligations archaeologists must follow as they conduct archaeological work, including acting as stewards of the collections accumulated and holding collections that are generated from their work in perpetuity until they can be transferred to a public institution (MTCS, 1990; Willems, 2007, 78). This condition states that:

The licensee shall hold in safekeeping all artifacts and records of archaeological fieldwork carried out under this license, except where those artifacts and records are transferred by the licensee to Her Majesty the Queen in right of Ontario or the licensee is directed to deposit them in a public institution in accordance with subsection 66(1) of the Act (MTCS, 1990, 3).

Subsection 66(1) of the Act states: “the Minister may direct that any artifact taken under the authority of a license, or a permit be deposited in such public institution as the Minister may determine, to be held in trust for the people of Ontario” (Ontario Heritage Act, R.S.O. 1990, 66[1]).

Before an archaeological project can begin, consultants are required to submit a *Project Information Form* (PIF) that must be approved the Ministry (MTCS, 2017). PIF's contain information about where a project is located and who the licensed archaeologists will be. The PIF number is used to track the report and related correspondence. Standards for CRM fieldwork and reporting are detailed in the *Standards and Guidelines for Consultant Archaeologists* (MTC, 2011). The consultant must also write a report which details information about the site history, excavation methodology, results, and future recommendations for the site. Copies of this report are required to be sent to the Ministry, the proponent, and kept by the consultant. The Ministry reviews the quality of the report and may either accept the report or request changes, ranging from minor edits to additional work. In some cases, acceptance of the report will allow the consultant to proceed with further field assessment, if recommended by the consultant. If no further archaeological investigations are needed, the accepted report will fulfill the developer's archaeological obligations and the project may proceed, assuming other development conditions have been satisfied (Birch, 2006, 14).

Archaeological sites discovered by licensed archaeologists must be registered with the Ministry through their online Past Portal system. If they are already registered, then a site update form must be submitted (MHSTCI n.d.b). When an archaeological site is registered or updated with the province the licensee is required to provide information on the artifact collection and associated records from the site, including where they will be stored.

Consultants may choose to curate the collections amassed from these projects themselves, or they may transfer collections to a public institution. For consultants to transfer collections, they are required to submit a *Licensee Request for Minister's Direction to Deposit an Archaeological Collection* form (MHSTCI, n.d). The *Archaeological Collections Deposit Fact*

Sheet (MHSTCI, 2018) issued by the Ministry summarizes the Ministry policy on the transfer of archaeological collections. It states that “Collections acquired under one licence cannot be transferred to another licensee nor can they be deposited with private businesses or individuals” (MHSTCI, 2018, 1-2). A copy of the *Archaeological Collections Deposit Fact Sheet* is included in Appendix A.

This deposit process is described in five steps that the archaeologist is required to complete:

1. Ensure that the related reports have been entered into the Ontario Public Register of Archaeological Reports and the associated site forms entered into the Ontario Archaeological Sites Database.
2. Identify a public institution that is prepared and willing to accept the collection and negotiate a Deposit Agreement with that institution.
3. Complete and submit the Licensee Request for Minister’s Direction to Deposit an Archaeological Collection (“deposit form”).
4. Submit a site correction or site update in Ontario’s Past Portal (PastPort) for ministry review. This will include the new proposed location of the archaeological collection.
5. Subject to Minister’s direction, deposit the collection with the public institution in accordance with the terms of the Deposit Agreement (*Archaeological Collections Deposit Fact Sheet*, 2-3).

The fact sheet also provides examples of what constitutes a public institution in which archaeologists may deposit collections. They include museums, archaeological repositories, ministries of the province, academic institutions, and Indigenous cultural centres (MHSTCI, 2018, 3).

Regarding Indigenous consultation in the long-term care of collections, the *Archaeological Collections Deposit Fact Sheet* states that engagement with Indigenous communities may add to the understanding of the collection and thereby enrich the archaeological record, while developing relationships among stakeholders (MHSTCI, 2018, 4).

The Ministry has also published *Engaging Aboriginal Communities in Archaeology: A Draft Technical Bulletin for Consultant Archaeologists in Ontario* (2011). It urges consultant archaeologists to “include the concerns of Aboriginal communities in your recommendations to the Ministry of Tourism and Culture on the disposition of collections” (MTC, 2011a, 11).

These are the current obligations, policies, terms, and guidelines that consultant archaeologists are required to follow regarding collections management. In summary, the Act ensures that the Ministry oversees the quality of archaeological work and the transfer of collections between licensees and public institutions. The *Archaeological Collections Deposit Fact Sheet* provides instructions for consultants on how to transfer collections to a public institution following the Ministry’s policy. The Ministry also specifies *Terms and Conditions for Archaeological Licenses* that state that consultants must act as stewards for the collections they amass while completing archaeological projects. (MHSTCI, 1990; Ontario Heritage Act, R.S.O. 1990, 66[1]; MTC, 2011; MHSTCI, 2018).

1.3 Indigenous Archaeological Policy

Though not issued by the Ministry, the Mississaugas of the Credit First Nation (MCFN) have established their own versions of archaeological standards and guidelines called *Standards and Guidelines for Archaeology* stating that; “respect for the Treaty relationship must be expressed through engagement in archaeological assessment and collaboration in the responsible stewardship of archaeological resources and cultural heritage values” (MCFN, 2018, 2). These guidelines include direction on how to proceed with collections management. They state that MCFN may direct control over collections relating to their community if the curatorial facility is unfit to maintain them, or until MCFN establishes their own facility (MCFN Standards and

Guidelines, 2018, 41). There are also MCFN guidelines for managing the costs of collections. They state that the Heritage Act makes consultants responsible for the initial costs of curation and the transfer costs to a public institution. If a transfer for the collections has not been specified, the license holder may remain liable for the cost of maintaining long-term management of collections (MCFN Standards and Guidelines, 2018, 41). The guidelines further outline what kind of costs a license holder may need to consider, such as short-term management, culturally specific standards, artifact handling, storage, and treatment (MCFN Standards and Guidelines, 2018, 42).

1.4 Other Ethical Considerations and Guidelines

A condition for having an archaeological license is the licensee must hold a membership with an archaeological organization with an ethical code of conduct (MHSTCI, n.d.a). A common organization of membership for licensees is the Ontario Archaeological Society (OAS) which has a *Statement of Ethical Principles* that their members must follow. Regarding collections, these ethics emphasize that Indigenous communities “have an inherent right to practice stewardship over their own cultural properties” (OAS, 2017) regardless of legal ownership. The OAS believes that archaeologists have a responsibility to share the results of archaeological projects in an accessible format and that collections should be maintained in an approved facility for long-term conservation. They also oppose the sale and trading of archaeological objects (OAS, 2017).

There are additional federal ethical guidelines that may not directly influence archaeological collections management in Ontario, but rather may have an indirect influence on how the profession is conducted and how public policy is shaped. The Government of Canada,

through the Canadian Conservation Institute, has published *Preventive Conservation Guidelines for Collections: Caring for Archaeological Collections* which provides advice on for collections management (Newton and Cook, 2018). It acknowledges that collections can grow to the thousands, or millions of artifacts and these objects must be documented, numbered, preserved, and stored under the terms and conditions of archaeological permits. Therefore, planning for collections management ought to happen before excavations, long before their arrival at a public institution (Newton and Cook, 2018).

The Canadian Association for Conservation of Cultural Property (CAC) and the Canadian Association of Professional Conservators (CAPC) have a *Code of Ethics and Guidance for Practice* for the conservation of cultural property. In this code of ethics, cultural property includes movable objects such as artifacts (CAC and CAPC, 2000, 13). There are three points in the code of ethics that I found particularly relevant to Ontario archaeology in terms of determining the delegation of responsibility of collections. The first point is that in conservation of cultural property, “professionals must be governed by an informed respect for the integrity of the property, including physical, conceptual, historical, and aesthetic considerations” (CAC and CAPC, 2000, 1). Secondly, a conservation professional understands their limitations and acknowledges the abilities and knowledge of others (CAC and CAPC, 2000, 1). The final key point states that the conservation professional will ensure that their service is completed in a “financially responsible manner with due regard for fairness to the client and with respect to the profession” (CAC and CAPC, 2000, 9). Why these ethical considerations are relevant to Ontario’s archaeological collections will be discussed further in the paper.

Chapter Two

2 What is the Curation Crisis?

With the relevant background in policy, ethical considerations, and the CRM industry in Ontario established, this chapter will address two related questions: what is the curation crisis and how did it happen? Chris Uchiyama (2015) outlines four threats to archaeological collections that have emerged from the CRM industry. These are: 1) an unsustainable influx of artifacts, 2) collections growing tremendously large due to collecting many “unfavorable artifacts,” 3) poor storage conditions leading to inaccessibility, and 4) a lack of a succession policy (Uchiyama, 2015, 2). These four combined threats contribute to the root causes of Ontario’s curation crisis.

2.1 Unsustainable Collections Rates

The number of archaeological sites that are excavated grows each year and has led to collections being amassed at an unsustainable rate (Uchiyama, 2015, 2). This is caused by Ontario’s booming development sector, with the resultant increase in CRM projects contributing to collections being generated faster than they can be curated and fully researched (Karrow, 2017, 8; Willems, 2007, 80). Consultant archaeologists are not limited as to how many sites they may work on each year. Between 1991 to 1997, consultants completed, on average, 370 projects per year (Birch, 2006, 14). By 2001, with Ontario’s economic growth, the amount of work undertaken by archaeological consultants each year had tripled (Ferris, 2002, 71). In 2020, there were 493 licensed archaeologists in the province with 2,667 archaeological projects registered and 2,820 archaeological reports submitted for review. This seven-fold increase in archaeological activity has increased the number of sites registered in the Ontario Sites Database

to 34,229 as of 2020 (OAS, 2021). Though not all licensees may be active in the province, all licensees may hold collections from sites in Ontario (MHSTCI, 2021). These numbers do not include those who may not have renewed their license, retired, or passed away, that may still be holding collections. Some small sites may yield just a few banker's boxes of artifacts, while large site may yield a few hundred boxes. Having so many past and present licensees with almost unlimited access to the archaeological record in the context of CRM work, has caused artifacts to be collected at staggeringly increasing rates. Thus, it has become a challenge to keep track of the disposition of collections from each licensee, sometimes resulting in collections being improperly cared for, or in the worst case, completely lost (Karrow, 2017, 18; King, 2016, 5).

2.2 Contents of Collections

Archaeological collections are often largely composed of what some consider “undiagnostic or undesirable artifacts” that are in poor condition (Uchiyama, 2015, 4). These may include artifacts such as rusty nails, small potsherds, glass shards, and lithic detritus. These artifacts offer limited or redundant data to researchers after being documented that debatably may have little to no value for further research or education (Smith et al., 2019, 18; Uchiyama, 2015, 4). Finding a public institution to curate such large collections of these types of artifacts is challenging due to a lack of resources and storage space. However, consultants are bound by their licenses to hold these collections for the people of Ontario and include them in collections transferred to repositories (Uchiyama, 2015, 4).

CRM archaeologists collect these types of artifacts largely because of the framework of salvage archaeology as described in William D. Lipe's *Conservation Model for American Archaeology* (Birch, 2006, 9; Lipe, 1974, 214). Lipe held the view that archaeologists should “...

treat salvage [archaeology], especially of the emergency kind, as a last resort to be undertaken only after all avenues of protecting the resource have failed” (Lipe, 1974, 214). Lipe argued in the 1970’s, that salvage excavations should only occur if the site can no longer remain *in situ*, which is an acceptable rationale for both academic research-oriented projects and CRM archaeology. However, this salvage archaeology principle has been utilized in heritage protection laws within a fast-paced economic and developmental growth period in Ontario (Birch, 2006, 11). The rapid pace of development in the province has resulted in the CRM industry salvaging first and asking questions later due to a concern for losing information that cannot be replaced, leading to collections being made of largely “undesirable artifacts,” comparable to “industrial production”, without knowing how much educational or research value they can truly provide (Birch, 2006, 10-11, 420; King, 2016. 6; Uchiyama, 2015, 4).

2.3 Collection are Inaccessible

Collections are often curated in less than favorable conditions, rendering them inaccessible to Indigenous descendants, researchers, and the public (Uchiyama, 2015, 4). In a survey conducted by Ipsos Reid in 2014, 80 percent of archaeologists who held collections indicated they had never been accessed by anyone (Ipsos Reid, 2014, 28). The study also revealed that 51 percent of participants stated their collections were being held by a private consulting firm, while 48 percent said they managed their collections personally (Ipsos Reid, 2014, 22). Currently, the Ministry does not provide enforced guidelines or policy for licensed archaeologists on how to curate artifacts and, according to Ipsos Reid, 47 percent of archaeologists do not follow a collections management policy or know if a policy exists (Karrow, 2017, 12; Ipsos Reid, 2014, 27). Since collections are under the stewardship of licensed archaeologists in trust for the people of Ontario, according to the Act, consultants often create

storage facilities from personal basements, garages, and storage lockers. The Act does suggest that licensed archaeologists will eventually transfer collections to public institutions, however, this rarely happens (Birch, 2006, 126; Karrow, 2015, 8; Kersel, 2015, 44; Williamson, 2010, 38). Collections are sometimes found with non-archival packaging, deteriorated, infested with pests, water damaged, with no security, in overflowing boxes, and lacking catalogs (Dewar, 1997; King, 2016, 10-11; Marquardt, 1982, 410). Dewar (1997) published an article in *Toronto Life* magazine in which she described conducting her own study involving experiments that revealed the difficult process of requesting access to collections and site reports in Ontario. When she did gain access to see a Ministry curated collection, she found it stored in disheveled conditions within a rotting garage (Dewar, 1997, 10) She recounted her own experience, and discussed other research archaeologists' attempts to request access to consultant or Ministry housed collections, and reported they were often met with reluctance because access supposedly required "permission of the authors" who are usually the licensees or their delegates (Dewar, 1997, 13). Dewar notes: "As I began to match cards to reports, Michael Johnson [the Manager of Archaeology for the Ministry at the time] swam up beside my worktable. 'Please keep a list of all reports you look at,' he said. 'I will need to inform the authors.' Why? I asked. Aren't these public documents? He said he'd have to check" (Dewar, 1997, 6).

Currently, one must be a registered licensed archaeologist to access Ontario's site reports using the Past Portal system, otherwise access must be requested through Ministry staff. Site location information is not made publicly available to protect sites from potential looting (Ontario, 2016). However, some CRM companies do have several of their site reports listed on their websites that are publicly available, likely because site excavations have already been complete and development has already destroyed the site, making it impossible to loot. This

leaves much of the dissemination of knowledge from CRM archaeology up to the goodwill of the licensed archaeologist, which may not always occur if some chose to retain their research because it is “commercially proprietary information” (Birch, 2006, 136; Welch and Ferris, 2014, 102). Thus, the Ministry required site reports have created a “grey literature” that is mostly unused by researchers or descendant communities (Welch and Ferris, 2014, 102). CRM archaeology as currently practiced in Ontario, limits opportunities for these collections to be researched and used for educational or cultural purposes. Consultant archaeologists become too busy with the field season and trying to earn a living to conduct much, if any, additional research beyond what is required to complete their license reports (Birch, 2006, 63-65). Financial support for consultants to conduct additional research into collections is rare, thus publication regarding the results of CRM projects is not consistent (Welch and Ferris, 2014, 102). There has been legislative action based on *why* it is important to collect these artifacts, however, there has been little action on *how* to utilize collections once they are out of the ground (Birch, 2006, 135-136; Williamson, 2010, 38).

2.4 Lack of Succession Planning

Lastly, Ontario has yet to develop an effective succession policy for archaeological collections when an archaeologist retires from the profession or passes away (Uchiyama, 2015, 2). With a lack of a succession plan, artifacts are at risk of being discarded, especially when the responsibility is no longer with the licensed archaeologist (Karrow, 2017, 11). Ipsos Reid’s study noted that 80 percent of archaeologists were concerned that their collections were at risk of becoming lost or damaged due to a lack of long-term planning (Ipsos Reid, 2014, 33). For example, Ronald Williamson, a prominent CRM archaeologist for four decades, recounted how a CRM archaeologist, and personal colleague, passed away suddenly and had his two-decades of

accumulated artifacts and associated records thrown away by his landlord (Karrow, 2017, 11). Ipsos Reid found that over 30% of their participants could retire, and a majority had not made any final disposition plans (Ipsos Reid, 2014, 10). Though there are repositories where archaeological consultants may deposit collections, such as the Sustainable Archaeology (SA) facilities at the London Museum of Ontario Archaeology (MOA) and at McMaster University in Hamilton, there is a minimum \$180 per box fee (MOA, 2020). To earn business, consultants must competitively bid for projects. This process has caused the costs of curation to be frequently cut from bid proposals in order to propose the lowest cost to developers. The result of this competitive bidding is that consultants opt to hold collections in private storage (Birch, 2006, 126; Karrow, 2017, 12; Williamson, 2010, 39), rather than accumulate sufficient funds to transfer their current and previous collections to the SA repositories (Karrow, 2017, 12-13).

The collections crisis in Ontario can be largely distinguished by these four pressing issues discussed in the literature. With the growth of Ontario's development sector, collections are amassed faster than they can be analyzed. This also leaves little time to consider what is being collected, what some may consider "undesirable" artifacts that have little analytical value. With these large collections consisting mainly of undiagnostic artifacts, it is difficult to find a long-term care facility or institution that will hold these collections. This has left consultant archaeologists as the long-term curators of archaeological collections and has resulted in these collections being stored in less than favorable conditions with limited accessibility for further research. Without a succession plan or policy in place, collections will continue to be amassed and stored in these conditions and the curation crisis will continue to grow into a bigger problem with each field season.

After conducting a review of the literature documenting the curation crisis in Ontario, I wanted to investigate what current stakeholders have experienced working with collections management in the province, with a focus on the delegation of responsibility for managing archaeological collections. The methodology developed for this study is described in the next chapter.

Chapter Three

3 Methodology

Methods utilized in this project first involved researching scholarly literature written about archaeological collections management and Ontario's curation situation, as discussed in Chapter 2. I then conducted semi-structured and semi-formal interviews with 20 individuals who are currently, or were, involved with archaeological collections management in the province.

3.1 Ethical Considerations & Participant Recruitment

This project was approved by the University of Western Ontario's Non-Medical Research Ethics Board (NMREB). Documents submitted for this project, including a Letter of Information, Letter of Consent, contact scripts, and a debriefing form, all of which were approved by the NMREB. The recruitment strategy and interview questions for this project were also approved by the NMREB. All participants in the project will remain anonymous and have been assigned a code, which is discussed further in this chapter. Measures have been taken to remove as much identifiable information as possible to maintain confidentiality, however, participants were informed that anonymity cannot be guaranteed because of Ontario's relatively small archaeological community. Due to the COVID-19 pandemic, recruitment was completed

online by emailing individuals invitations to participate and interviews were conducted using Zoom Video Communications to comply with social distancing measures. The interviews were recorded on Zoom with consent from each participant.

In order to obtain perspectives on archaeological collections management from a broad range of stakeholders, participants were drawn from five categories based on their backgrounds and personal experience: CRM archaeologists, descendant community representatives, museum or repository curators, academic and avocational archaeologists, and individuals with experience working in the Ministry. These groups were selected because they all share a common interest in artifact collections as valuable resources that deserve management, but at the same time, each group plays a different role in Ontario archaeology and might be expected to hold differing views on artifact curation. While each group brings an agenda and bias to valuing collections (Welch and Ferris, 2014, 98), selecting a completely non-biased, value-neutral participant group for this study was not feasible given the topic. These sample biases are acknowledged as an aspect of the study design.

For CRM archaeologists, names of participants were selected from the MHSTCI's online list of licensed professional archaeologists and from the online membership list of the Ontario Association of Professional Archaeologists (APA). All CRM archaeologists had some responsibility for artifact collections in their positions. Descendant community representatives were also selected from the APA website, cultural centre staff directories, and publicly available archaeological reports. They all had some level of responsibility for artifact collections in their positions. Academic and avocational archaeologists were combined into one group as both are more focused on research-based archaeology. Individuals from this group were selected from the MHSTCI's list of licensed avocational archaeologists and University staff and graduate student

directories. Curators were selected from their associated museum staff directories. Individuals in the Ministry category were selected based on having past or present experience working with the Ministry. Selection for this category came from the MHSTCI list of licensed archaeologists, the Ministry's staff directory, and publicly available reports. Table 1 demonstrates how many individuals from each group were interviewed for this project. Some participants could fit into multiple study categories based on their varied professional experience, but they were only assigned to one group. Factors such as individual's primary career occupation and representation were considered while determining each potential participant's group.

For the recruitment process, a list of potential participants from each group was compiled in an Excel spreadsheet and each potential participant was assigned a number to be randomly selected using a random number generator. Those who were selected were sent an email with an invitation to participate in this research project. If a reply was not received after one week, a follow-up message was sent, again inviting the individual to participate. This follow-up email also informed individuals that after another week without a reply, the research team would assume the invitation had declined and move on to another randomly selected individual. If an individual was interested in participating, the Letter of Information and the Letter of Consent were sent for participants to review. If they agreed to participate after review of these letters, a signature on the Letter of Consent was requested acknowledging the terms before the interview began.

As stated, participants are to remain anonymous and have been assigned a code. The code was determined based on their associated group with a letter and a number. Those who are CRM archaeologists were assigned letter C (e.g., C1, C2, C3), avocational archaeologists are V,

academic archaeologists are A, past Ministry employees are M, descendant community representatives are D, and curators are R.

CRM participants were from differing geographical locations across northern, southern and eastern Ontario. Descendant community representatives were from various communities in southern Ontario. Curator participants were from museums and repositories of varying sizes and locations across southwestern Ontario. Academic and Avocational archaeologist participants were also from southwestern Ontario. Thus, while the sample was randomly selected, in the end, there were more participants from southwestern Ontario than elsewhere in the province.

Table 1: Number of participants.

Participant Category	Number of Participants
CRM Archaeologists (C)	5
Descendant Communities (D)	4
Curators (R)	4
Academic (A) and Avocational (V) Archaeologists	4
Past Ministry Employees (M)	3
Total	20

3.2 Limitations

Though the interviews were a success, there were some limitations to the project that are important to address. Some perspectives regarding archaeological collections management, such as those of development proponents and interested members of the public, are missing from this project due to its limited timeframe and already extensive participant group. After much deliberation, these five groups were chosen because the topic of this paper focuses on the

responsibility for long-term management of collections, thus these groups were determined to be the most relevant.

All participants were asked questions regarding MHSTCI's archaeological policy, as mentioned in Chapter 1. Some participants were more informed about the current policy than others and some required a quick briefing about the policy. This situation led to participants having varying degrees of understanding of what the policy is and how it works with respect to Ontario archaeology.

Lastly, it should be noted that the participants from the Ministry category do not include individuals who are currently employed by the Ministry or represent their perspectives. After an initial positive response from two current government employees, they indicated that permission was needed from their superiors to participate in this project. Despite attempts to follow up, I did not receive a reply from either employee on whether they were granted permission, therefore, I concluded that permission was either not granted, or other circumstances prevented them from participating. As a result, all participants from this category were individuals that had been previously employed by the Ministry. Thus, it is acknowledged that the results of the project do not represent the opinions of current Ontario government employees in the heritage sector. Further, the opinions of past government employees may reflect a type of "former employee bias" depending on their experience as a government employee and the time elapsed since their government employment. Finally, it is acknowledged that past Ministry employees may not have been aware of current Ministry collections policies, especially policies related to artifact transfers from licensees to Indigenous communities.

3.3 Interview Questions

The goal for interviewing multiple individuals in the five categories was to hear personal experiences and concerns with collections management from a variety of stakeholders who are actively engaged with archaeological collections. While an attempt was made to limit interviews to one hour in length, in fact they ranged from 45 minutes to almost two hours long, as some participants were more talkative than others. These questions were semi-formal to give participants room to discuss and elaborate on their experiences with collections management during the interview. The interview questions were also semi-standardized and tailored to each group's background. This was done to gain further and broader insights into participants' experiences with archaeological collections that might not otherwise be obtained by asking the same structured interview questions to all participants. It is important to state that having semi-standardized interview questions that varied among participant groups based on their profession and identity undoubtedly had an affect on the results of the study. In a few instances, the flow of conversation moved away from the interview question guides and some questions were not discussed, however, all conversations remained on the main theme of responsibility for collections in Ontario. The main themes discussed in the interviews were:

1. What are the views and expectations among stakeholders regarding archaeological collections management?
2. What is effective and ineffective about the current collections management system?
3. What role should descendent communities have in collections management?
4. Who ultimately should have responsibility over archaeological collections in Ontario?

The focus of this research was on artifact collections; thus, questions were not asked regarding human remains to avoid straying too far off topic. Some questions remained consistent across all

five sets of interview questions because they were about the core questions and themes this research project aims to investigate. These include the expectations among stakeholders, the role of descendant communities in collections management, and the how responsibility over collections should be delegated. Questions common to all five groups included:

- What is your opinion of CRM archaeologists curating collections over the long term?
- Would you prefer if CRM archaeologists had more or less responsibility over archaeological collections?
- What do you think is working well with the current MHSTCI collections management policy?
- What do you think is not working with the current MHSTCI collections management policy?
- If you could change something with the policy, what would it be?
- Who do you think ought to ultimately have responsibility over archaeological collections? (Alternative question: How do you think responsibility over collections management ought to be delegated?)

Deaccessioning was a topic that was brought up by participants in the first interviews conducted, thus I decided to ask all participants about the topic of deaccessioning in later interviews. This process allowed even coverage of the topic of deaccessioning even though it was not one of the original planned questions.

With CRM archaeologist participants, tailored questions were asked regarding how they manage collections methodologically and financially. Every participant was asked about their opinions about how the current policy holds CRM archaeologists responsible for holding collections over the long-term, however, CRM archaeologists were questioned further about how that policy affects their businesses' collections management.

- Are you involved with descendant communities in your collections management? If so, how?
- What has your experience been like with collections management from your point of view?

- After an excavation, what are your curatorial methods? How do you curate archaeological artifacts?
- What sort of expectations do you have for the Ministry of Heritage, Sport, Tourism and Culture Industries (MHSTCI) regarding archaeological collections? For other archaeological consultants?
- The MHSTCI policy for collections management states: “Section 66(1) of the Ontario Heritage Act provides the Minister of Tourism, Culture and Sport (or delegate) with the power to direct artifacts to be deposited in a public institution to be held in trust for the people of Ontario. This means that the archaeologist, as a licensee, is responsible for collections made under his or her licence unless he or she deposits them in a public institution or with the province... Collections acquired under one licence cannot be transferred to another licensee nor can they be deposited with private businesses or individuals” (Archaeology Collections Deposit Fact Sheet,1-2). What are your thoughts on that policy? How does this affect your own collections management?
- What methods do you use to financially manage the costs of curating your collections?
- What policy does your company have regarding collections management?

Descendant community representatives were specifically asked questions about how their communities have been consulted in the process of collections management, the Ministry policy, and if representatives are satisfied with their involvement. Specific questions included:

- How has Ontario’s collections policy affected your work/community?
- How much access do you have to archaeological collections related to your community?
- How much control do you have over collections related to your community?
- What do you think of the current policy for how collections are curated?
- How have you or your community been consulted regarding long-term care of archaeological collections?
- Do you feel that the MHSTCI collections management policy has represented your concerns well?
- In your view, are there collections or artifacts that need ceremonial treatment? If so, who should be responsible for such ceremonies? Is there a need for policy in this area?

For curator participants, tailored questions were aimed to gain insight into the role curators have in Ontario’s archaeological collections management and to investigate how curators interact particularly with CRM archaeologists.

- What has your experience been like with archaeological collections management?
- Has the MHSTCI policy for CRM archaeological collections affected your institution?

- What sort of expectations do you have of the MHSTCI in regard to archaeological collections? For consultants? For curators?
- Does your institution face any conflicts regarding archaeological collections management?
- Is your institution interested in receiving CRM collections? How many boxes and how much storage space would be designated for them? (Do you have storage space?)
- If your institution is not interested, why?
- Is there much local interest in your archaeological collections?
- Do you charge fees for archaeological collections? How do you charge fees? How much are the fees? (one-time, annual fee?)
- Do you involve descendant communities within your collections management? If so, how? What kinds of responsibilities do they have?

The objective of the Ministry questions was to gain a better insight into what they expect from other stakeholders, what they think of the current collections management policy, and how the Ministry exercises its authority to govern archaeological collections.

- What has your experience been like with archaeological collections management from your point of view?
- Is the MHSTCI currently facing conflicts in regard to collections management?
- How do you think Ontario's collections management policy and process compares with other provinces?
- What sort of expectations do you have for archaeological consultants in regard to archaeological collections? For curators?
- Are descendant communities involved with the MHSTCI and collections management?
- Does the MHSTCI share responsibility for collections with descendant groups?
- Does the Ministry ever take over/direct collections to be deposited at specific institutions? (Possible follow up: What happens if a licensee dies or loses their license?)

As for academic and avocational archaeologists, questions were aimed at investigating how collections management affects a researcher, the degree of responsibility a researcher has over the collection they study, and if the current Ministry collections policy affects conducting research on collections.

- What responsibilities do you have for curation of your archaeological collections?
- Are you involved with descendant communities in your research? If so, how?
- Has the MHSTCI's curation policy affected your research?
- What has your experience been like with archaeological collections management?

- Do you run into challenges with your research that are related to collections management?

3.4 Process of Analysis

The audio files of the interviews were first transcribed using Word and Zoom auto-transcription functions. To analyze the qualitative data, these completed transcripts were uploaded to NVivo, a computer software specialized in qualitative data analysis. In NVivo, each transcript was coded, and thematic analysis was used to review which categories were coded most frequently. Coding involved highlighting certain quotes from the transcripts and organizing them under specific topics and subtopics (see Figure 1). Coded quotes were selected based on participants’ experiences, perspectives, and ideas in response to the interview questions, which usually related to their categorized group. Subtopics and topics were established based on these responses from the interview questions and titled to encapsulate certain, more generalized, characteristics of the coded quotes. These characteristics will be elaborated upon further in the paper. Some topics were further broken down into subtopics if a specific item relating to that topic was frequently discussed.

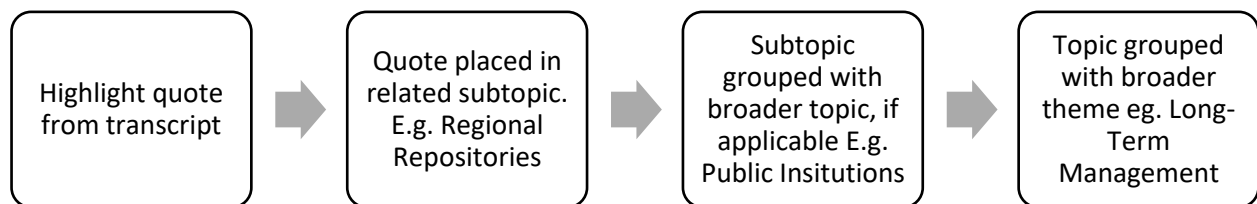


Figure 1: Process of how subtopics, topics and themes were established.

Some highlighted quotes fit into more than one subtopic, thus were organized into multiple topics or subtopics. When all the topics and subtopics were established through coding participants’ answers to the interview questions, they were organized into broader homologous

themes based on their subject matter. Five overarching themes were created after grouping all the subtopics together: long-term management, stakeholders and collections, Indigenous communities and collections, Ministry policy, and ultimate responsibility. These themes reflect the focus of the interview questions, as all participants were asked about these subjects.

3.4.1 Long-Term Management Theme

Table 2 shows the theme “Long-Term Management” which contains nine topics and 12 subtopics. “Academic Long-Term Management” involves discussions surrounding the management of archaeological collections by academics.

Table 2: Long-term management topics and subtopics.

<i>Theme</i>	<i>Topic</i>	<i>Subtopic</i>
<i>Long-Term Management</i>	Academic Long-Term Management	
	Collections Use and Utility	Deaccessioning
		Lack of Collections Use
		Live Collections
		Processing Collections
	Accessibility	Lack of Accessibility
	CRM Long-Term Management	
	Legacy Collections	
	Long-Term Loans	
	Mismanagement of Collections	Collectors
		Mismanagement Stories
	Public Institutions	Regional Repositories
Sustainable Archaeology		
Museum Methodology		
	Policy in Museums	
Storage	Lack of Storage	

The “Collections Use and Utility” topic encapsulates four subtopics: “Deaccessioning,” “Lack of Collections Use,” “Live collections,” and “Processing Collections.” “Deaccessioning”

involves removing artifacts or entire collections from their holder (Domeishel and Waggle, 2020, 420). “Lack of Collections Use” includes discussions about archaeological collections not being utilized for research or other potential gain. Alternately, “Live Collections” are those that are stored in an active institution and repository that are actively curated and researched. “Processing Collections” involves the procedures of analysis conducted on archaeological collections.

“Accessibility” is the next topic which involves discussion about archaeological collections being reached by researchers, descendant communities, and the public. “Lack of Accessibility” is the subtopic of “Accessibility,” which specifically refers to the inability to reach archaeological collections.

“CRM Long-Term Management” is the curation of archaeological collections by licensed archaeologists. “Legacy Collections” are archaeological collections amassed by licensed archaeologists that have not been transferred to a public institution, usually understood to be older and large (Karrow, 2017, 14; King, 2016, 5). The “Long-Term Loans” topics concerns archaeological collections that an institution may lend to another institution for an agreed amount of time.

“Mismanagement of Collections” involved conversations about collections not receiving proper care and includes two subtopics; “Collectors” and “Mismanagement Stories.” “Collectors” refer to individuals who collect artifacts and amass collections outside of the Ministry licensing system. “Mismanagement Stories” refer to participants’ experiences with archaeological collections not receiving adequate care.

The “Public Institutions” topics involve facilities that are equipped for long-term care of collections. This topic consists of four subtopics: “Regional Repositories,” “Sustainable

Archaeology,” and “Museum Methodology,” and “Policy in Museums.” “Regional Repositories” are facilities that are meant to house archaeological collections which are located across the province. “Sustainable Archaeology” refers to the two repositories in London and Hamilton that were funded through the Canadian Foundation for Innovation Research Grant and the Ontario Research Fund (Karrow, 2017, 12). “Museum Methodology” and Museum Policy” involve the procedures and policies that museums employ to care for their collections, that may or may not include archaeological collections.

“Storage” refers to what space exists and is available for archaeological collections, whereas its subtopic “Lack of Storage” consist of discussions regarding the unavailability of space.

3.4.2 Stakeholders and Collections Theme

Table 3 displays the “Stakeholders and Collections” theme which encapsulates those who are maintaining most of Ontario’s archaeological collections, how they do or do not collaborate with each other, and how archaeological collections affect them. Ministry and Indigenous stakeholders were not included in this topic because they were deserving of their own theme.

Table 3: Stakeholders and collections topics and subtopics.

<i>Theme</i>	<i>Topic</i>	<i>Subtopic</i>
<i>Stakeholders and Collections</i>	Academic Collections	
	Avocational Archaeology	
	Connections and Collaborations	Academic Collaborations
		CRM Collaborations
		Curator Collaborations
		Lack of Collaboration
	CRM Companies	CRM Bids
	CRM Collections	
	Methodology	

	Expectations for CRM
Curators and Archaeological Collections	
OAS	

“Academic Collections” and “Avocational Archaeology” refer to how archaeological collections affect academic and avocational archaeologists’ research and analysis. “Connections and Collaborations” are the experiences participants discussed with other stakeholders regarding archaeological collections. This topic was divided into four subtopics, three by varying stakeholders including “Academic, CRM, and Curator Collaborations” which consist of participants’ experiences and opinions regarding collaborative efforts from each stakeholder in archaeological collections management. There is also a subtopic discussing a “Lack of Collaboration” between stakeholders.

The topic of “CRM companies” and archaeological collections was organized into three subtopics “CRM Bids,” “CRM Collections Methodology,” and “Expectations for CRM.” “CRM Bids” include discussions about competitive bidding, how bidding methodology is conducted by CRM participants, and how it may affect collections management. “CRM Collections Methodology” are discussions about how consultants curate the collections they amass. “Expectations for CRM” includes discussion from a variety of participants, including CRM archaeologist participants, regarding what they would like from CRM archaeologists in terms of collections management.

“Curators and Archaeological Collections” includes discussions from all participants about their opinions and experiences between archaeological collections and museum curators.

Lastly, the “OAS” involves discussions regarding how the Ontario Archaeological Society is involved with archaeological collections management.

3.4.3 Indigenous Communities and Collections Theme

Table 4 presents the “Indigenous Communities and Collections” theme which involves discussions related to archaeological collections and Indigenous involvement and concerns. “Consultation and Involvement” includes participants’ positive experiences and examples of collaborations with descendant communities and archaeology. This topic has one subtopic, a “Lack of Consultation” that includes examples of dissatisfactory consultation from participants’ experiences.

Table 4: Indigenous communities and collections topics and subtopics.

<i>Theme</i>	<i>Topic</i>	<i>Subtopic</i>
<i>Indigenous Communities and Collections</i>	Consultation and Involvement	Lack of Consultation
	Hypocrisy	
	Indigenous Methodology	
	Indigenous Policy	
	Overlapping claims	
	Racism	
	Spiritual Concerns	

The “Hypocrisy” topic concerns the differing expectations of licenced archaeologists for artifact storage compared to the storage quality expected of Indigenous cultural centres. The “Indigenous Methodology” and “Indigenous Policy” topics involved discussions around how these are implemented in Ontario archaeology. Participants also discussed the complications arising from “Overlapping Claims” among Indigenous groups regarding archaeological sites and artifact collections, and similar situations that occur when artifact collections consist of both settler and

Indigenous components. Often, sites and collections are separated between “contact” and “pre-contact,” however, there are some collections that have both Indigenous and Europeans artifacts, and these may be subject to overlapping claims. Elements of “Racism” that Indigenous groups and individuals experience within archaeology were also expressed during the interviews. Finally, “Spiritual Concerns” for the proper care of sensitive artifacts were also voiced among some participants.

3.4.4 Ministry Policy Theme

Table 5 demonstrates the “Ministry Policy” theme which included a wide variety of participants’ opinions about the Ministry’s collections management policy discussed in Chapter 1. “Archaeological Licensing” addresses participants’ views about the Ministry’s licensing system of consultant archaeologists.

Table 5: Ministry policy topics and subtopics.

<i>Theme</i>	<i>Topic</i>	<i>Subtopic</i>
<i>Ministry Policy</i>	Archaeological Licensing	
	Changes wanted in the policy	Enforcement
	Expectations for the Ministry	
	Heritage Act	
	Ministry Policy Negatives	
	Ministry Policy Positives	
	Ministry Stepping Back	

“Changes Wanted in the Policy” include participants’ wishes for adjustments in the Provincial framework of archaeological collections management policy. A reoccurring change wanted was “Enforcement” from the Ministry which became its own subtopic. Discussions around the effectiveness of the “Heritage Act” was also included in this theme. “Ministry Policy Positives” and “Ministry Policy Negatives” involve participants’ opinions and experiences with the policy

the Ministry currently employs. Finally, the “Ministry Stepping Back” topic includes the views of several participants who expressed frustration with the perception that the Ministry is stepping away from their responsibilities in archaeological collections management.

3.4.5 Ultimate Responsibility Theme

Table 6 represents the topics and subtopics of the “Ultimate Responsibility” theme. Every participant was asked their opinions on how responsibility for archaeological collections management should be delegated.

Table 6: Ultimate responsibility topics and subtopics.

<i>Theme</i>	<i>Topic</i>	<i>Subtopic</i>	
<i>Ultimate Responsibility</i>	Academic Responsibility		
	CRM Responsibility		
	Finances		Charging Fees
			Funding
			Proponents
	Indigenous Responsibility		
	Ministry Responsibility		
	Ownership		
	Storage Facility Responsible		

Academic archaeologists, CRM archaeologists, Indigenous groups, the Ministry and Storage Facilities are all stakeholders that were discussed as having responsibility for collections. I included “Ownership” of archaeological collections in this theme as whoever is considered to have ownership carries the responsibility for caring archaeological collections as well. The “Finances” topic is likely one of the most important responsibilities associated with maintaining archaeological collections and was organized into three subtopics. “Charging fees” obviously refers to situations where an individual or institution charges storage or transfer fees when receiving collections. “Funding” involves general discussion about attaining, or trying to obtain,

funding for archaeological collections management. “Proponents” are individuals or organizations that hire consultant archaeologists and must pay for archaeological fieldwork to be completed and collections management if budgeted.

With all transcripts coded and five main themes established, the data could then be translated into graphs and tables to illustrate the frequency with which participants discussed the various topics and subtopics, based on the number of codes recorded for each. The results of this analysis are discussed in Chapter 4.

Chapter Four

4 Results

As discussed, five overarching themes were established that represent the most discussed topics from the interviews. The five themes were:

1. long-term management of collections;
2. Indigenous communities and collections;
3. stakeholders and collections;
4. the Ministry's policy on the curation of archaeological collections; and
5. who should have ultimate responsibility for collections.

Each of these themes include multiple topics, some which have further specified subtopics. To demonstrate the results of how each topic and subtopic were discussed during the interviews, the frequencies of occurrence of topics and subtopics were coded in NVivo and then organized into data tables for each theme. These tables show how often each topic and subtopic were discussed by participants, and the percentage occurrence of each topic and subtopic. Bar graphs were also created for each theme that demonstrate the frequency of occurrence of each topic and subtopic for each theme. The topics and subtopics were colour-coded and stack on top of each participant code in the bar graphs showing the frequency with which they were discussed the topic during the interview. There is also a table on the bottom of each graph that shows numerically how often a topic or subtopic was referenced by a participant. If a topic or subtopic was not discussed, then the colour assigned to that topic will not appear over the participant code and the number for that topic will be a zero.

It should be noted that participants D3 and D4 were interviewed together, thus their codes are combined together in the graphs.

4.1 Long Term Management of Collections

Table 7 shows the frequency of occurrence of topics and subtopics within the “Long-Term Management” theme. This theme was referenced 519 times in all transcripts. “Public Institutions” alone was referenced 4.05% of the time, while together, including all four subtopics, it represented 21.59% of the discussion in this theme. The topic “Collections Use and Utility” was broken down into four specific subtopics which together comprised 21.01% of references in this theme. This topic included the most and least discussed subtopics in the entire theme, with “Deaccessioning” emerging as the most discussed subtopic at 11.95%, whereas “Processing Collections” was the least discussed at 1.16%. “Storage” and “Lack of Storage” consisted of 15.99% of the discussion, while “Mismanagement of Collections” represented 13.30% of this theme. “Accessibility,” including its subtopic “Lack of Accessibility,” and “CRM Long-Term Management” both represented 8.48% of this theme’s discussion. Finally, the least discussed topics were “Academic Long-Term Management” at 2.70% and “Long-Term Loans” at 1.35%.

Table 7: Breakdown of topic and subtopic by references in long-term management theme.

Topics	Subtopics	Number Referenced in All Transcripts	% Referenced in All Transcripts
Public Institutions		21	4.05
	Sustainable Archaeology	36	6.94
	Regional Repositories	33	6.36
	Museum Methodology in Collections	11	2.12
	Policy in Museums	11	2.12
Public Institutions - Total		112	21.59

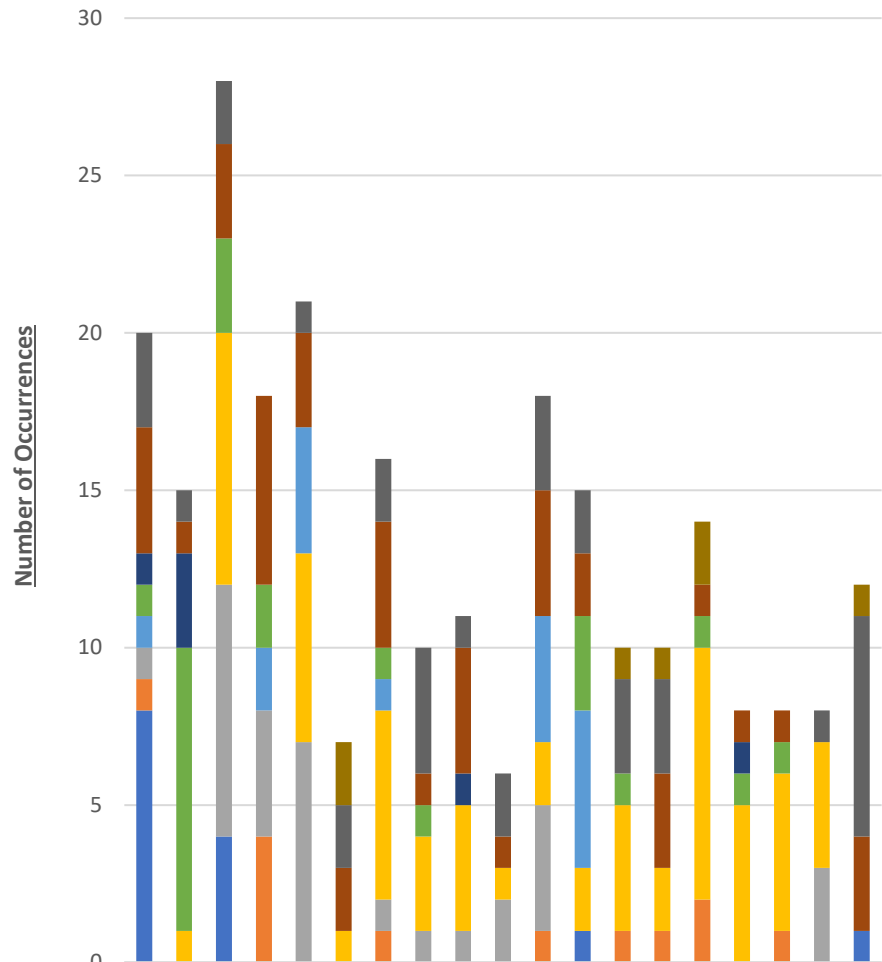
Collections Use and Utility		0	0.00
	Deaccessioning	62	11.95
	Live Collections	24	4.62
	Lack of Collections Use	17	3.28
	Processing Collections	6	1.16
Collections Use and Utility - Total		109	21.01
Storage		42	8.09
	Lack of Storage	41	7.90
Storage - Total		83	15.99
Mismanagement of Collections		7	1.35
	Collectors	33	6.36
	Mismanagement Stories	29	5.59
Mismanagement of Collections - Total		69	13.30
Accessibility		12	2.31
	Lack of Accessibility	32	6.17
Accessibility - Total		44	8.48
CRM Long-Term Management		44	8.48
Legacy Collections		37	7.13
Academic Long-Term Management		14	2.70
Long-Term Loans		7	1.35
Total:		519	100.03

Figures 2 and 3 graphically illustrate which participants discussed (or did not discuss) each topic and subtopic in the “Long-Term Management” theme. This theme was split in two graphs to demonstrate this data more effectively, as not all the topics and subtopics fit onto one graph clearly. The x-axis of each graph represents a participant with their associated code, and the y-axis is the number of occurrences a topic or subtopic was referenced by a participant.

“Collections Use and Utility” is not listed on either figure since only the subtopics were referenced by participants. Topics that have zero references are not illustrated in the bar graphs.

Figure 2 demonstrates how discussions regarding “Deaccessioning” occurred quite frequently among most participants. “Legacy Collections” and “CRM Long-Term Management” were also discussed among a variety of participants. Meanwhile, “Academic Long-Term Management” was rarely discussed outside of academic and avocational participants. As shown in Figure 3, “Storage,” “Lack of Storage,” “Sustainable Archaeology,” and “Mismanagement Stories” were all discussed frequently between many participants. “Regional Repositories” were mostly discussed among CRM participants and past Ministry employees.

Breakdown of Topics by Participant in Long-Term Management Theme: Part 1

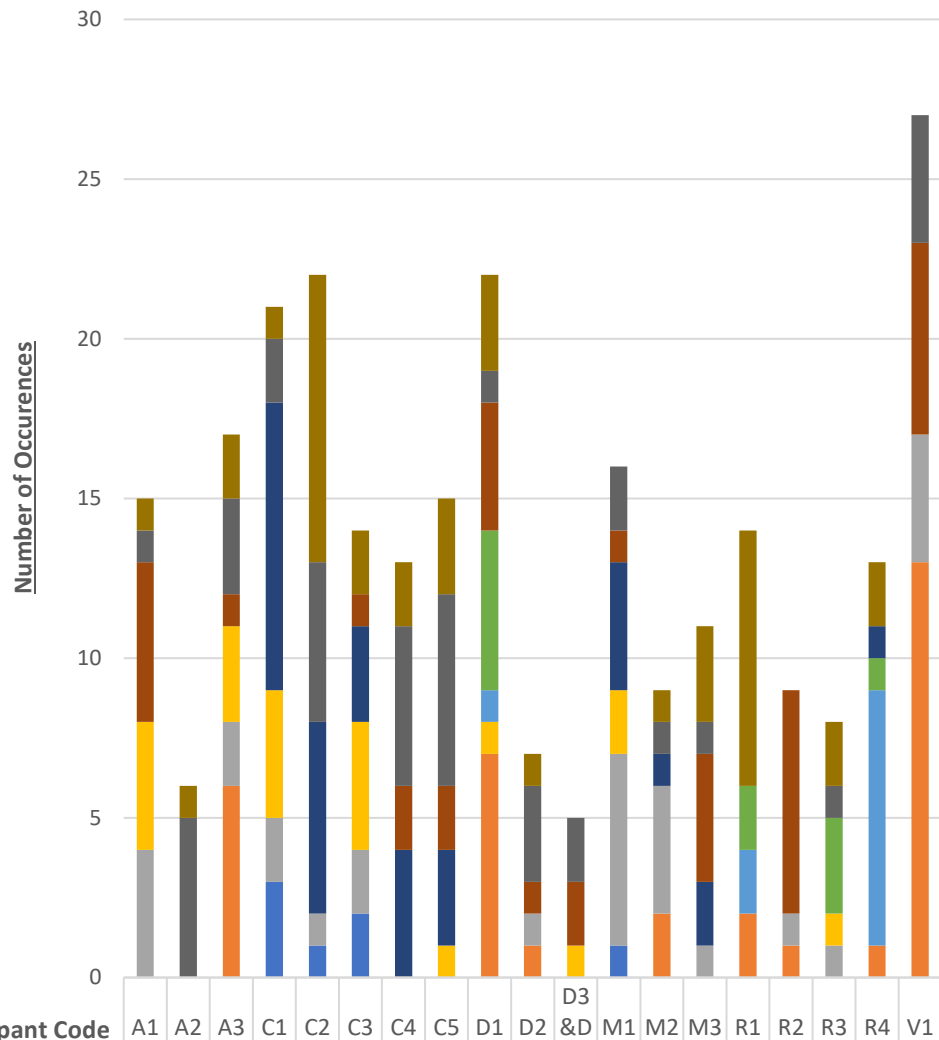


Participant Code

	A1	A2	A3	C1	C2	C3	C4	C5	D1	D2	D3 & D4	M 1	M 2	M 3	R1	R2	R3	R4	V1
Long-Term Loans	0	0	0	0	0	2	0	0	0	0	0	0	1	1	2	0	0	0	1
Legacy Collections	3	1	2	0	1	2	2	4	1	2	3	2	3	3	0	0	0	1	7
CRM Long-Term Management	4	1	3	6	3	2	4	1	4	1	4	2	0	3	1	1	1	0	3
Processing Collections	1	3	0	0	0	0	0	0	1	0	0	0	0	0	0	1	0	0	0
Live Collections	1	9	3	2	0	0	1	1	0	0	0	3	1	0	1	1	1	0	0
Lack of Collections Use	1	0	0	2	4	0	1	0	0	0	4	5	0	0	0	0	0	0	0
Deaccessioning	0	1	8	0	6	1	6	3	4	1	2	2	4	2	8	5	5	4	0
Lack of Accessibility	1	0	8	4	7	0	1	1	1	2	4	0	0	0	0	0	0	3	0
Accessibility	1	0	0	4	0	0	1	0	0	0	1	0	1	1	2	0	1	0	0
Academic Long-Term Management	8	0	4	0	0	0	0	0	0	0	0	1	0	0	0	0	0	0	1

Figure 2: Breakdown of topic and subtopic by participant in long-term management theme (Part 1).

Breakdown of Topics by Participant Long-Term Management: Part Two



	A1	A2	A3	C1	C2	C3	C4	C5	D1	D2	D3 &D 4	M1	M2	M3	R1	R2	R3	R4	V1
Lack of Storage	1	1	2	1	9	2	2	3	3	1	0	0	1	3	8	0	2	2	0
Storage	1	5	3	2	5	0	5	6	1	3	2	2	1	1	0	0	1	0	4
Sustainable Archaeology	5	0	1	0	0	1	2	2	4	1	2	1	0	4	0	7	0	0	6
Regional Repositories	0	0	0	9	6	3	4	3	0	0	0	4	1	2	0	0	0	1	0
Policy in Museums	0	0	0	0	0	0	0	0	5	0	0	0	0	0	2	0	3	1	0
Museums Methodology	0	0	0	0	0	0	0	0	1	0	0	0	0	0	2	0	0	8	0
Public Institutions	4	0	3	4	0	4	0	1	1	0	1	2	0	0	0	0	1	0	0
Mismanagement Stories	4	0	2	2	1	2	0	0	0	1	0	6	4	1	0	1	1	0	4
Collectors	0	0	6	0	0	0	0	0	7	1	0	0	2	0	2	1	0	1	13
Mismanagement of Collections	0	0	0	3	1	2	0	0	0	0	0	1	0	0	0	0	0	0	0

Figure 3: Breakdown of topic and subtopic by participant in long-term management theme (Part 2).

4.2 Stakeholders and Collections

Table 8 shows the frequency with which subtopics were discussed in the “Stakeholders and Collections” theme, totaling at 228 references. The “CRM Companies” topic was divided among several subtopics, which together represented 44.74% of 228 references in this theme. The most commonly discussed subtopic in this topic and theme was “CRM bidding” at 18.86%. Similarly, the topic “Connections and Collaborations” was divided among four subtopics which, in total, represented 31.59% of the entire theme. “Lack of Collaborations” was the most common subtopic discussed within this topic. “Curators and Archaeology Collections” was the next most frequently discussed topic, consisting of 10.96% of the theme. The “OAS” and “Academic Collections” topics were discussed nearly the same amount, with “OAS” at 5.70% and “Academic Collections” at 5.26%. Finally, the least discussed topic of this theme was “Avocational Archaeology” at 1.75%.

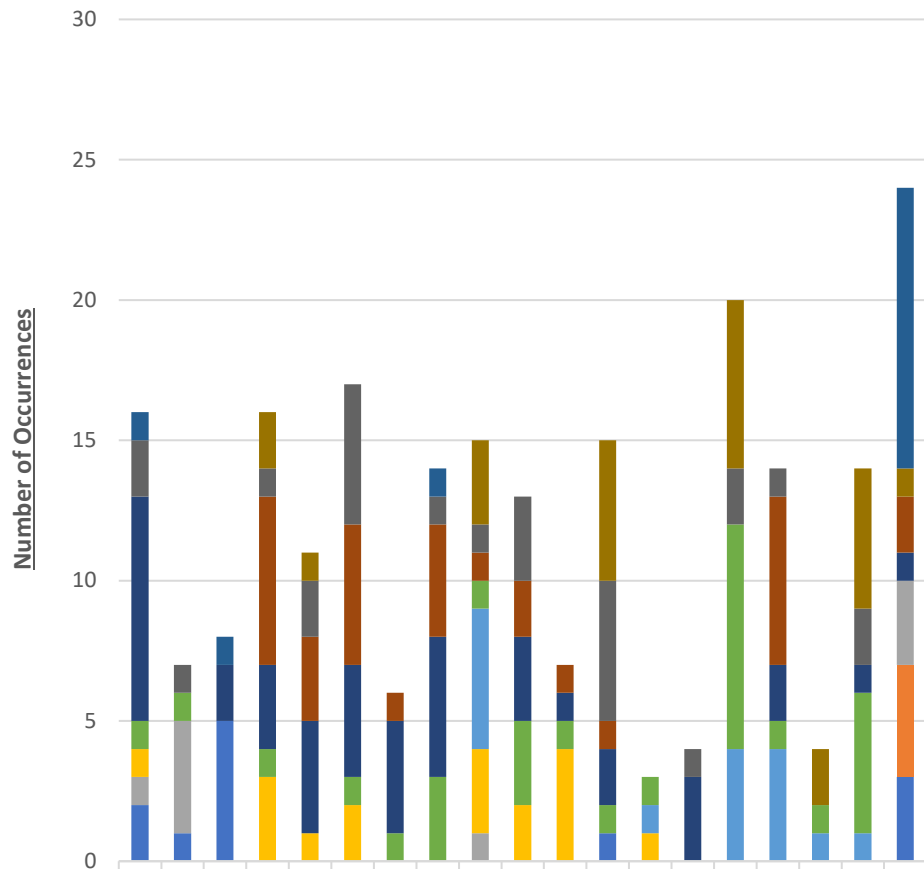
Table 8: Breakdown of topic and subtopic by references in the stakeholders and collections theme.

Topics	Subtopics	Number Referenced in All Transcripts	% Referenced in All Transcripts
CRM Companies		0	0
	CRM Bidding	43	18.86
	CRM Collections Methodology	32	14.04
	Expectations for CRM	27	11.84
CRM Companies - Total		102	44.74
Connections and Collaborations		0	0
	Academic Collaborations	9	3.95
	CRM Collaborations	17	7.46
	Curator Collaborations	16	7.02
	Lack of Collaborations	30	13.16

Connections and Collaborations - Total		72	31.59
Curators and Archaeology Collections		25	10.96
OAS		13	5.70
Academic Collections		12	5.26
Avocational Archaeology		4	1.75
Total:		228	100.00

Figure 4 graphically illustrates the frequency of occurrence of topics and subtopics by participant within the Stakeholders and Collections theme. Subtopics “Expectations for CRM,” “CRM Bidding,” and “Lack of Collaborations” were all discussed by most participants. The “OAS” was mostly referenced by V1, the lone avocational participant, making up 10 out of 13 of the topic’s references. “CRM Collections Methodology” was not referenced by any academic participant, and only by one curator participant who happened to have some experience working in the CRM industry. “Curator Collaborations” were only discussed by participants with a history of museum experience, as D1 and M2 both discussed their past involvement in museums. Curator participants did not talk about “CRM collaborations,” rather this subtopic was mostly discussed by CRM participants and descendant representatives. “Academic Collaborations” were mainly discussed by academic and avocational participants, while “Avocational Archaeology” was only referenced by the sole avocational participant in the study.

Breakdown of Topics by Participant in Stakeholders and Collections Theme



Participant Code

	A1	A2	A3	C1	C2	C3	C4	C5	D1	D2	D3	M1	M2	M3	R1	R2	R3	R4	V1
OAS	1	0	1	0	0	0	0	1	0	0	0	0	0	0	0	0	0	0	10
Curators and Arch. Collections	0	0	0	2	1	0	0	0	3	0	0	5	0	0	6	0	2	5	1
Expectations for CRM	2	1	0	1	2	5	0	1	1	3	0	5	0	1	2	1	0	2	0
CRM Collections Methodology	0	0	0	6	3	5	1	4	1	2	1	1	0	0	0	6	0	0	2
CRM Bidding	8	0	2	3	4	4	4	5	0	3	1	2	0	3	0	2	0	1	1
Lack of Collaborations	1	1	0	1	0	1	1	3	1	3	1	1	1	0	8	1	1	5	0
Curator Collaborartions	0	0	0	0	0	0	0	0	5	0	0	0	1	0	4	4	1	1	0
CRM Collaborations	1	0	0	3	1	2	0	0	3	2	4	0	1	0	0	0	0	0	0
Academic Collaborations	1	4	0	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0	3
Avocational Archaeology	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	4
Academic Collections	2	1	5	0	0	0	0	0	0	0	0	1	0	0	0	0	0	0	3

Figure 4: Breakdown of topic and subtopic by participant in stakeholders and collections theme.

4.3 Indigenous Communities and Collections

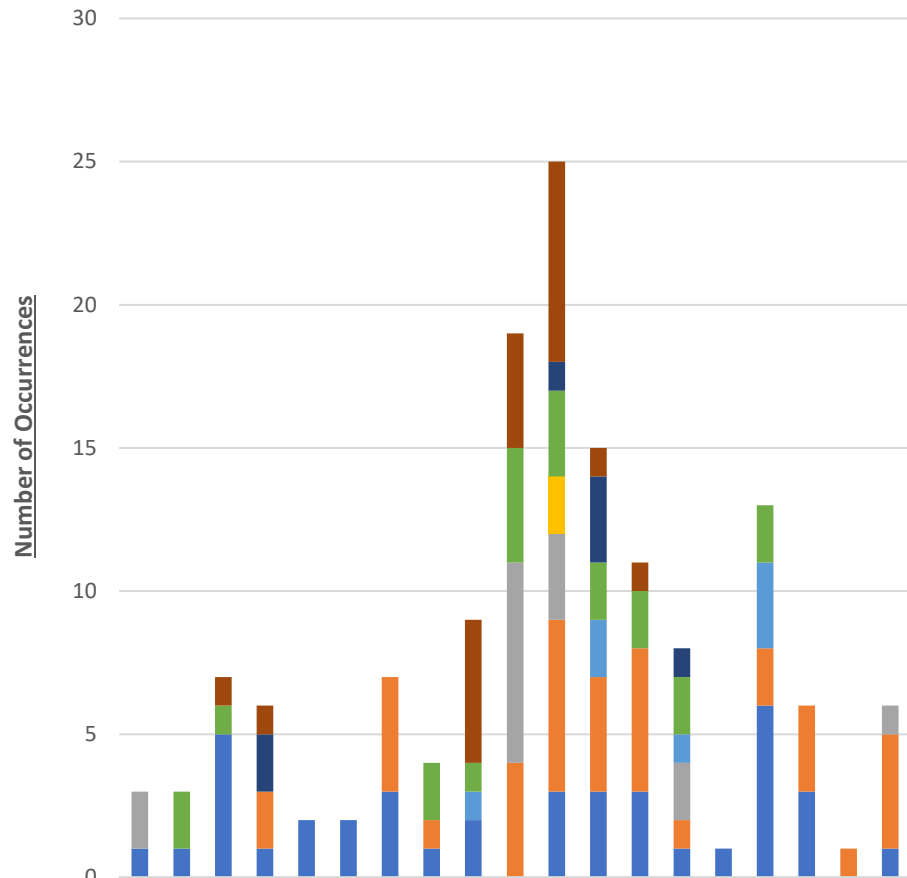
Table 9 shows the frequencies and percentages of the topics and subtopics discussed by participants within the “Indigenous Communities and Collections” theme. “Consultation and Involvement” was the most commonly discussed topic of this theme, consisting of 51.35% of 148 references of this theme. It was broken down almost evenly between discussions of productive consultation and involvement (26.35%) and references to a lack of consultation (25.00%). The topic of “Overlapping Claims” was referenced 14.91% of the time and “Spiritual Concerns” were discussed almost equally, at 13.51% within this theme. Discussions subsumed under the topic “Hypocrisy” represented 10.14% of the theme, while “Indigenous Policy” and “Racism” were discussed the same number of times, both representing 4.73%. The least discussed topic was “Indigenous Methodology,” representing 1.35% of the total theme.

Table 9: Breakdown of topic and subtopic by references in Indigenous communities and collections theme.

Topic	Subtopic	Number Referenced in All Transcripts	% Referenced in All Transcripts
Consultation and Involvement		39	26.35
	Lack of Consultation	37	25.00
Consultation and Involvement - Total		76	51.35
Overlapping Claims		21	14.19
Spiritual Concerns		20	13.51
Hypocrisy		15	10.14
Indigenous Policy		7	4.73
Racism		7	4.73
Indigenous Methodology		2	1.35
Total:		148	100.00

Figure 5 graphically presents which participants discussed each topic and subtopic within the “Indigenous Communities and Collections” theme. It shows that “Consultation and Involvement” was discussed by nearly all participants. “Lack of Consultation and Involvement” was not referenced by academic participants, rather, each academic participant discussed examples of consulting involving Indigenous communities in their studies. “Overlapping Claims” and “Spiritual Concerns” were discussed primarily by descendant representatives and past Ministry employees. “Indigenous Methodology” consisted only of contributions from participants D3 and D4.

Breakdown of Topics by Participant in Indigenous Communities and Collections Theme



<u>Participant Code</u>	A1	A2	A3	C1	C2	C3	C4	C5	D1	D2	D3 &D 4	M1	M2	M3	R1	R2	R3	R4	V1
Spiritual Concerns	0	0	1	1	0	0	0	0	5	4	7	1	1	0	0	0	0	0	0
Racism	0	0	0	2	0	0	0	0	0	0	1	3	0	1	0	0	0	0	0
Overlapping claims	0	2	1	0	0	0	0	2	1	4	3	2	2	2	0	2	0	0	0
Indigenous Policy	0	0	0	0	0	0	0	0	1	0	0	2	0	1	0	3	0	0	0
Indigenous Methodology	0	0	0	0	0	0	0	0	0	0	2	0	0	0	0	0	0	0	0
Hypocrisy	2	0	0	0	0	0	0	0	0	7	3	0	0	2	0	0	0	0	1
Lack of Consultation	0	0	0	2	0	0	4	1	0	4	6	4	5	1	0	2	3	1	4
Consultation and Involvement	1	1	5	1	2	2	3	1	2	0	3	3	3	1	1	6	3	0	1

Figure 5: Breakdown of topic and subtopic by participant in Indigenous communities and collections theme.

4.4 Ministry Policy

Table 10 shows the frequency with which topics within the “Ministry Policy” theme were discussed. “Changes Wanted in Policy” and its subtopic “Enforcement” were the most discussed issues of this theme, resulting in 25.89% out of 309 total references. However, “Ministry Policy Negatives” were discussed with almost the same frequency, consisting of 25.57% of the total discussions in this theme. The observation of the “Ministry Stepping Back” was the next most frequently discussed topic, representing 17.80% of the discussion. The topic of “Archaeological Licensing” comprised 10.68% of the discussion in this theme, and references to “Ministry Policy Positives” made up 8.74% of the total. The least discussed topics were the “Heritage Act” representing 5.83% and “Expectations for the Ministry” representing 5.50% of this theme.

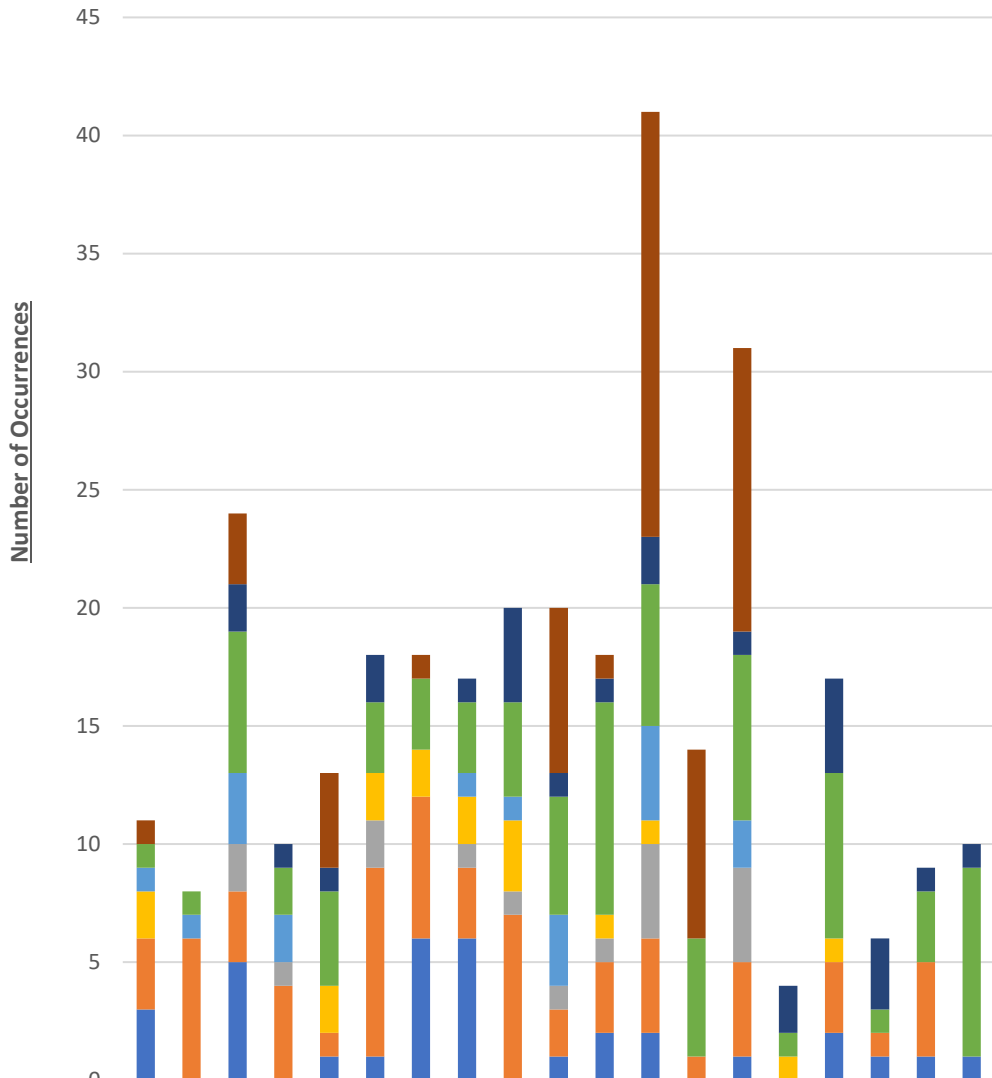
Table 10: Breakdown of topic and subtopic by references in Ministry policy theme.

Topic	Subtopic	Number Referenced in All Transcripts	% Referenced in All Transcripts
Changes Wanted in Policy		63	20.39
	Enforcement	17	5.50
Changes Wanted in Policy - Total		80	25.89
Ministry Policy Negatives		79	25.57
Ministry Stepping Back		55	17.80
Archaeological Licensing		33	10.68
Ministry Policy Positives		27	8.74
Heritage Act		18	5.83
Expectations for the Ministry		17	5.50
Total:		309	100.01

Figure 6 graph displays the frequency with which participants discussed each topic and subtopic for the “Ministry Policy” theme. Most of this theme’s topics were discussed by a wide

range of participants. The past Ministry employee participants contributed the most to the topic “Ministry Stepping Back,” particularly M1, while curator participants did not discuss this topic. Curator participants also did not discuss the “Enforcement” subtopic. Each participant was asked about their opinions regarding “Ministry Policy Positives” and “Ministry Policy Negatives,” thus these topics were discussed with nearly all participants. Notably, “Ministry Policy Negatives” was the only topic discussed by all participants.

Breakdown of Topics by Participant in Ministry Policy Theme



<u>Participant Code</u>	A1	A2	A3	C1	C2	C3	C4	C5	D1	D2	D3 &D 4	M1	M2	M3	R1	R2	R3	R4	V1
■ Ministry Stepping Back	1	0	3	0	4	0	1	0	0	7	1	18	8	12	0	0	0	0	0
■ Ministry Policy Positives	0	0	2	1	1	2	0	1	4	1	1	2	0	1	2	4	3	1	1
■ Ministry Policy Negatives	1	1	6	2	4	3	3	3	4	5	9	6	5	7	1	7	1	3	8
■ Heritage Act	1	1	3	2	0	0	0	1	1	3	0	4	0	2	0	0	0	0	0
■ Expectations for Ministry	2	0	0	0	2	2	2	2	3	0	1	1	0	0	1	1	0	0	0
■ Enforcement	0	0	2	1	0	2	0	1	1	1	1	4	0	4	0	0	0	0	0
■ Changes Wanted in Policy	3	6	3	4	1	8	6	3	7	2	3	4	1	4	0	3	1	4	0
■ Archaeological Licensing	3	0	5	0	1	1	6	6	0	1	2	2	0	1	0	2	1	1	1

Figure 6: Breakdown of topic and subtopic by participant in Ministry policy theme.

4.5 Ultimate Responsibility

This theme has two components: first, the general discussion from participants regarding “Ultimate Responsibility,” and second, the participants’ answers to the final question of the interview, which asked about the delegation of ultimate responsibility for archaeological collections.

Table 11 shows the number of times each topic and subtopic surfaced in general discussions of the “Ultimate Responsibility” theme. The “Finances” topic encapsulates three subtopics that were discussed among participants. Together, this was the most discussed topic representing 38.77% of the total 183 references, broken down between Funding (25.28%), Charging Fees (11.24%) and Proponents (2.25%). “Indigenous Responsibility” and “Ministry Responsibility” were discussed the same amount at 17.98% of the theme. Discussions related to “Storage Facility Responsibility” represented 9.29% of the conversation on this theme. “Ownership” was discussed 7.87% of the time and CRM responsibility was discussed at a similar frequency, making up 6.74% of the theme. The least discussed topic was “Academic Responsibility” contributing 3.93% to the theme.

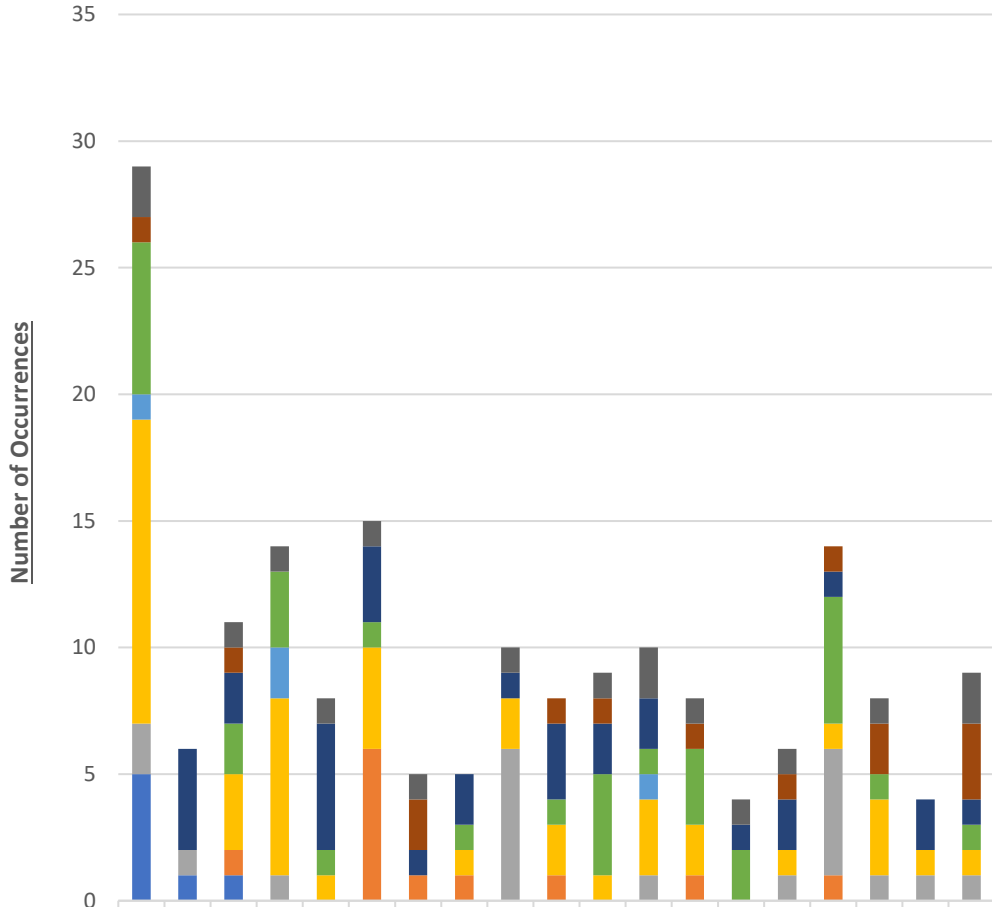
Table 11: Breakdown of topic and subtopic by references in ultimate responsibility theme (General Discussion).

Topics	Subtopics	Number Referenced in All Transcripts	% Referenced in All Transcripts
Finances		0	0.00
	Funding	45	25.28
	Charging Fees	20	11.24
	Proponents	4	2.25
Finances - Total		69	38.77
Indigenous Responsibility		32	17.98
Ministry Responsibility		32	17.98

Storage Facility Responsibility		17	9.29
Ownership		14	7.87
CRM Responsibility		12	6.74
Academic Responsibility		7	3.93
Total:		183	102.56

Figure 7 shows the frequency with which individual participants discussed each topic and subtopic within the general discussion of the “Ultimate Responsibility” theme. The topics of “Storage Facility Responsibility,” “Ministry Responsibility,” and “Indigenous Responsibility” were all discussed by a wide variety of participants. “Funding” was also frequently discussed, particularly by A1 who contributed substantially to this subtopic. “Charging fees” was only discussed once by CRM participants, while most of the discussion of that topic was contributed by participants with curatorial experience. “CRM Responsibility” was mostly discussed by C3, and “Academic Responsibility” was only discussed by academic participants.

Breakdown of Topics by Participant in Ultimate Responsibility Theme (Discussion)



<u>Participant Code</u>	A1	A2	A3	C1	C2	C3	C4	C5	D1	D2	D3 &D 4	M1	M2	M3	R1	R2	R3	R4	V1
■ Storage facility responsible	2	0	1	1	1	1	1	0	1	0	1	2	1	1	1	0	1	0	2
■ Ownership	1	0	1	0	0	0	2	0	0	1	1	0	1	0	1	1	2	0	3
■ Ministry Responsibility	0	4	2	0	5	3	1	2	1	3	2	2	0	1	2	1	0	2	1
■ Indigenous Responsibility	6	0	2	3	1	1	0	1	0	1	4	1	3	2	0	5	1	0	1
■ Proponents	1	0	0	2	0	0	0	0	0	0	0	1	0	0	0	0	0	0	0
■ Funding	12	0	3	7	1	4	0	1	2	2	1	3	2	0	1	1	3	1	1
■ Charging fees	2	1	0	1	0	0	0	0	6	0	0	1	0	0	1	5	1	1	1
■ CRM Responsibility	0	0	1	0	0	6	1	1	0	1	0	0	1	0	0	1	0	0	0
■ Academic Repondibility	5	1	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

Figure 7: Breakdown of topic and subtopic by participant in ultimate responsibility theme (General Discussion).

Table 12 summarizes participants’ immediate answers to the final question of the interviews which asked who should be responsible for archaeological collections and how should this responsibility be delegated. This question is complex, and Table 12 is an extremely condensed summary of responses to this question, which will be explored further in Chapter 5. Participants often listed multiple stakeholders in response to this question, which is why there are 36 total references in Table 12, even though there were only 20 participants. Although participants may have referenced a topic in the previous discussion component, such as “CRM Responsibility” or “Indigenous Responsibility,” depending on the context of the quote, that response may not have been reflected in their answer to the direct question of who should have ultimate responsibility for archaeological collections. That being said, “Repository Facility” was the most common answer to this question, at 39% of the total responses. “Indigenous Responsibility” was slightly higher at 31% than “Ministry Responsibility” at 28%. Only one individual answered that “CRM Archaeologists” should have an ultimate responsibility for collections over the long-term.

Table 12: Breakdown of topic and subtopic by references in ultimate responsibility theme (Answers to Final Question).

Topic	Number Referenced in All Transcripts	% Referenced in All Transcripts
Repository Facility	14	39
Indigenous Responsibility	11	31
Ministry Responsibility	10	28
CRM Archaeologists	1	3
Total:	36	101

Figure 8 graphically displays participants’ direct answers to who should have responsibility for archaeological collections and how this responsibility should be delegated. Fifteen out of 20 participants stated that responsibility for collections should be delegated to a

repository facility, although most listed other stakeholders who should share in the responsibility. Ten out of 20 participants think the Ministry should also be involved with this responsibility, while the other half did not include the Ministry in their answers. Eleven out of 20 participants answered that Indigenous communities should be delegated responsibility for archaeological collections, but again, most thought that other stakeholders should share responsibility. Only one participant (C3) included CRM archaeologists as a stakeholder who should share ultimate responsibility for archaeological collections management, although it is worth noting that C3 also thought responsibility should be delegated to repositories and the Ministry.

Three participants (C2, D3, and D4) indicated that delegation of responsibility should include three stakeholders: a storage repository, Indigenous communities, and the Ministry. Five participants (A1, C1, M2, M3 and R3) answered this responsibility should include two stakeholders: Indigenous Communities and a storage repository. Three participants (A3, C4 and M1) felt that responsibility should rest with two stakeholders: a storage repository and the Ministry. Three respondents (D1, R1 and V1) thought that only storage repository facilities should have ultimate responsibility for collections. Two participants (C5 and R2) indicated that the Ministry and Indigenous Communities should be delegated this responsibility. Two other participants (A2 and R4) felt that only the Ministry should hold ultimate responsibility. Only one participant (D2) felt that only Indigenous communities should have responsibility of archaeological collections. Finally, only one participant (C3) thought that a storage repository

facility, the Ministry, and CRM archaeologists should all share ultimate responsibility for archaeological collections.

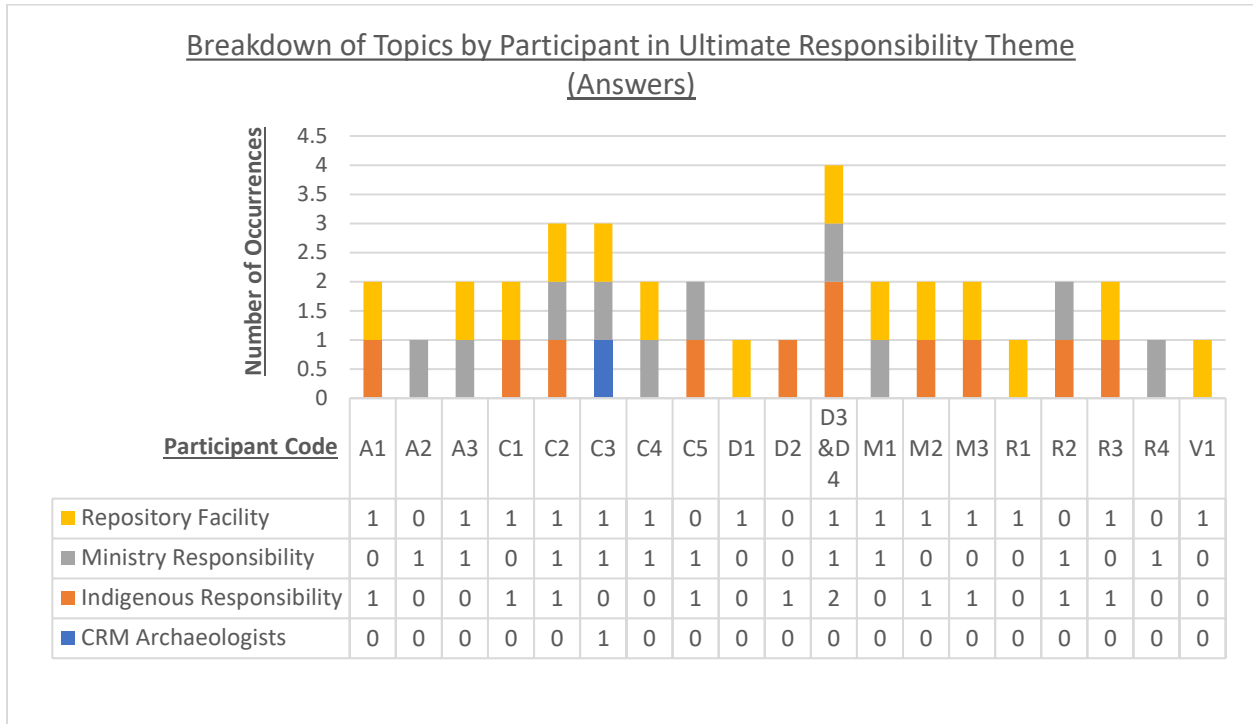


Figure 8: Breakdown of topic and subtopic by participant in ultimate responsibility theme (Answers to Final Question).

Based on these results, most participants believe that long-term storage facilities should be included in the delegation of responsibility for archaeological collections. Many participants also believe that Indigenous Communities and the Ministry must be involved in the long-term management of collections. Notably, CRM archaeologists were only referenced by one individual. According to these results, nearly all participants do not think CRM archaeologists should be involved in the responsibility of the long-term curation of archaeological collections, yet the majority of Ontario’s archaeological collections are in consultant storage (Birch, 2006, 126; Karrow, 2015, 8; Kersel, 2015, 44; Williamson, 2010, 38). In sum, there appears to be a disconnect between how study participants think archaeological collections should be curated,

compared to how they truly are curated over the long-term. These results are explored in more detail in the next chapter.

Chapter Five

5. Discussion

According to the results of the final question asked during interviews, participants believe that the ultimate responsibility for archaeological collections should be delegated among long-term storage facilities, CRM archaeologists, Indigenous Communities, and the Ministry of Heritage, Sport, Tourism and Culture Industries. This chapter will explore in more detail the issues that participants discussed during the interviews and discuss multiple related topics and subtopics. Not all topics and subtopics could be discussed within the scope of this study.

5.1 Long-Term Facilities: Public Institutions

Before discussing the current transfer process in the CRM industry in Ontario, the notion of transferring collections to a repository or an institution such as a museum to be held in safekeeping should be briefly explored, as that is how most participants believe collections should be curated. The beginnings of institutions holding collections in Ontario can be traced back to the 19th and early 20th century. Museums have been described as being “political arenas in which definitions of identity and culture are asserted and contested, and as forums for discussion” (Hamilton, 2010, 11). In the 19th century to early 20th century, these institutions were often founded on the archaeological collections of farmers and their families (Hamilton, 2010, 15). One example is the Museum of Ontario Archaeology (MOA), which was originally founded based on a collection of artifacts from Wilfrid Jury and his father, Amos Jury. They collected and curated Indigenous artifacts themselves and acquired other local farmers’ collections to display as exhibits. When notable businessman and owner of the Lawson site, Ray Lawson, requested space for the Museum of Indian Archaeology and Pioneer Life, he also requested that the Jurys

would be its curators (MOA, 2020a). The display and conversation regarding Indigenous artifacts in these institutions was told by Euro-Canadians, seldomly involving, and at times rejecting, Indigenous perspectives (Hamilton, 2010, 11). With pressure of assimilation from colonialism and separation of material culture from Indigenous communities, such as sacred objects being sold by collectors despite community resistance, museums were often seen as ideal to hold collections because of fear they would be lost if left with Indigenous communities (Hamilton, 2010, 108).

Who has the right to stewardship is still an often discussed topic today, and the procedures, ethics, and paradigms in the discipline have changed greatly since its origins in Ontario. Decolonization within these institutions and in heritage management has been a movement since the Second World War (Hamilton, 2010, 173). There are various definitions of decolonization. Broadly, decolonization involves the breakdown and remodeling of how knowledge is produced and establishing a power balanced relationship between Indigenous peoples and settler Canadians (Gaudry and Lorenz, 2018, 219). “Decolonizing archaeology” aims to involve Indigenous traditional values and authority in the study and methods of archaeology. Another approach is the “Indigenization” of museums, which involves planning on how to incorporate fields of both Indigenous knowledge and European-derived knowledge (Hamilton, 2010, 117; Gaudry and Lorenz, 2018, 219). Some Indigenous peoples have doubts if these institutions can truly incorporate traditional Indigenous values and principles along with museum practices, however, Indigenous cultural centres are considered by some as a middle-ground between museums and Indigenous values and principles as they promote “the continuance and strengthening of Indigenous culture” (Hamilton, 2010, 182-183). Though having more incorporation of Indigenous traditional values is widely accepted, there are some

who disagree with the approach. One example is attributed to Norman Zepp, who was a curator of Inuit art at the Art Galley of Ontario. He was against artists selecting work for exhibits stating it represented a “retreat from scholarship” (Hamilton, 2010, 182). As some participants discussed in this study, these attitudes of ‘the scholar knowing best’ and ‘it is safer in a scholarly institution’ still have some prevalence within Ontario collections management today.

According to the results of the interviews, most participants do not believe CRM archaeologists should be responsible for long-term care of collections. However, currently most collections are held by licensed archaeologists, the majority of whom work in the CRM industry (Birch, 2006, 14). This is due to the previously mentioned Ministry *Terms and Conditions for Archaeological Licenses* appended to each license that states that licensees must hold artifacts collected under their licenses in safekeeping until they are directed to deposit them in a public institution (MTCS, 1990, 3).

How have CRM archaeologists become the long-term curators of collections, despite the Act and the Terms and Conditions for licensees suggesting that collections will eventually be transferred? And why are collections rarely transferred to other institutions by consultants (Birch, 2006, 126; Karrow, 2015, 8; Kersel, 2015, 44; Williamson, 2010, 38)? Some participants, such as C2, suggested that there are limited options for consultants to transfer collections. “I think it's the lack of repositories that are accessible to archaeologists, that's the real issue” (C2). According to the *Archaeological Collections Deposit Fact Sheet*, qualified public institutions for archaeological collections include museums, archaeological repositories, ministries of the province, academic institutions, and Indigenous cultural centres (MHSTCI, 2018, 3). All these public institution options will be discussed in this chapter.

5.1.1 Museums

Before beginning this project, I thought museums would be a viable option for archaeological collections transfers. However, when I first began reaching out to potential museum curator participants, I did not receive many replies. When I finally did conduct my first interview with a museum curator, I asked why museums were not interested in a project about the curation of archaeological collections. The response was:

I would say archaeology hasn't been the focus of the museum world, unless they were an archaeology museum, so there's that. That's likely where you're finding a lot of people say no... When I went through museum management, and all of my work, I don't think we touched on archaeology; I don't think we ever [did] because that was for the archaeologists to do. They had to worry about that (R1).

Another museum curator participant confirmed this: “I think there's a big gap between curators and museums if they're not specifically archaeological based museums... I don't think a lot of curators are really familiar with the practices or the policies behind archaeology” (R3). Another curator (R4) had experience in both archaeology and museums and said, “I didn't have a course that taught me how to store artifacts... well, how do I care for these things?” (R4). Based on this admittedly small sample, there appears to be a gap between curators and archaeologists in the province. Even though museums are listed as a transfer option on the *Archaeological Collections Deposit Fact Sheet*, archaeological collections are not often being transferred to museums.

Further, CRM archaeologists do not seem to be reaching out to museums or repositories to curate their collections. R2 stated “it's not terribly frequently that we're ... getting messages and serious messages about ... licensees and consultant companies wanting to deposit collections” (R2). I asked R1 if they had any consultants offer to transfer collections to their museum and they stated “not at this point and I'm not even aware that there's been a lot of digs go on in here in the county lately. But we haven't had anyone else contact us about potential of

that” (R1). Some academic archaeologists also seem to be ignoring museums as potential artifact repositories. A2 stated “sometimes what we talk about in academia doesn't necessarily reach, uh, museums...” (A2). I asked R1 if any university had contacted them about collections, but they stated their academic contacts are from internship placements from public history or museum management programs, which do not seem to offer much archaeological collections management training.

Museum curator participants all discussed that museums have physical storage limitations and items chosen for museum collections must be selected carefully due to these limitations. C3 discussed that when their company attempted to transfer collections to institutions, such as museums, they stopped receiving replies once those institutions realized the size of the collections:

One of the collections we have is about 200 boxes... It's definitely overwhelming, so I don't blame them there for being like, 'oh ok, never mind.' Especially 'cause a lot of museums don't have the storage space to take on that sort of thing, right? Kind of an overlapping issue with museums and archaeology in terms of storage (C3).

Not only are the sizes of collections a limitation for museums, but also the context of the collections may not meet the mandate of the museum. “We as a field have realized that we can't take everything. Like, we should be taking the things that really have high relevance to our communities ... and we can care for responsibly” (R3). Most smaller museums focus on the history of their locality, thus will not be interested in collections that may have been excavated from other areas. The contents of the collections also may not meet a museum's mandate. “...the most important things are the things that have the stories we can tell... we have to figure out [what] the future generations might find important ... to research” (R1). According to R1 and R3, artifacts in museums should be relevant for educating the public and retelling the past through their displays. What is problematic about archaeological collections in Ontario is the fact

that “most of what we dig up is not museum quality” (V1), rather, collections often consist of artifacts that some consider offer little to no further value or information (Smith et al., 2019, 18; Uchiyama, 2015, 4). This is not to say that archaeological collections and museums cannot work together, rather it illustrates that it is not currently common, despite the assumption that they often work together. Thus, consultants looking to transfer their collections to museums are likely not to be accepted.

5.1.2 Academic Institutions

Another option listed in the *Collections Deposit Fact Sheet* is for CRM archaeologists to transfer collections to academic institutions. However, it is extremely rare that an academic institution will store and take and responsibility for a collection. The collections at academic institutions are often tied to individual professors at the institution, not the institution itself. Once that individual retires, the collections are, in most cases, the individual’s responsibility to remove from the institution. “Here when somebody retires, if they're no longer there and they're not using those collections, then there's a big, in universities, there's a big push to free up space” (A1). A3 also discussed their retirement experience with moving collections; “but you know the collections, even as an academic, I stored them, and I had a... lab... So, before I retired, I had to clean all that out of course, and that's why the collections ended up here at home” (A3). It is important for the Ministry to list academic institutions as a potential option for CRM archaeologists to transfer collections to, as that creates the possibility that some collections will ideally be received and have further study conducted. However, realistically, academic institutions are not storage spaces for private businesses, and thus are not a reliable option for consultants to plan on for the ultimate disposition of artifacts they accumulate.

5.1.3 Archaeological Repositories

Two key archaeological repositories in Ontario are the Sustainable Archaeology facilities at the Museum of Ontario Archaeology in London and McMaster University in Hamilton. These repositories were established to house archaeological collections and provide research opportunities. These facilities were funded with almost \$10,000,000 from the Canadian Foundation for Innovation Research Grant and the Ontario Research Fund (Karrow, 2017, 12). Sustainable Archaeology now works with the MOA to provide long-term care for archaeological collections. As well, access to these collections is provided to descendant communities, researchers, and the public (MOA, 2020b). Every 3-5 years, the MOA updates their strategic plans to review and expand on the institution's priorities and objectives (MOA, 2019, 2). At the time of writing, their current mission is to "share, interpret, and care for the archaeological record to advance an understanding of Ontario's heritage" (MOA, 2020a). These facilities provide an option for CRM archaeologists to deposit collections after gathering artifacts through fieldwork if they do not wish to maintain them. However, after discussing these repositories with participants, it appears that there are some challenges that prevent collections from reaching the Sustainable Archaeology facilities. "It would be interesting to know what percentage of material recovered by CRM firms is actually making its way to Sustainable. Because when I walk through there, Sustainable looks awfully empty" (V1).

Rather than collections being received from CRM archaeologists, most of the collections at Sustainable Archaeology have been coming from the MHSTCI and the Ministry of Transportation (MTO). As one curator noted "...the majority of [the] material ... has ... either come from the Ministry or MTO. So, ultimately, they derive from consultants, but they're not coming directly from consultancy" (R2).

The reason that these facilities are not being utilized by consultants often comes down to one factor: money. There is a per box deposit fee that depends on the quality of packaging and how many boxes are in the collection. It is currently set at \$180 to \$200 per box for most collections. At this price range, participants noted this cost can be challenging to budget for while competitively bidding for projects because other consultants may not have curation or transfer costs in their bid, so a client may be more inclined to select a competitor's cheaper budget. As one consultant noted, "...it's hard to kind of stick your neck out and be the first one to bill for that, because then you don't want to price yourself out of the market, right?" (C3). I asked C3 and C5 if Sustainable Archaeology costs were being included in the bidding process at their representative firms. C3 stated:

We haven't yet. I know it's definitely something we've talked about and would like to do in the future, but it's something that I think that needs to be built into the cost of future projects... it just makes the most sense to keep it all here instead of, uh, you know, taking the hit for the cost to transfer it all (C3).

C5 also discussed collections that were dug in the past and did not have curation costs built into the budget:

We've thought about that... it's taking a long time to decide because we have a, what is it? Nearly ten years of collections that, again, we didn't budget for to pay for the storage at Sustainable. So, it's really the accountants and the financial officers being like ... 'so, this is just going to ... [increase]... our overhead,' kind of and you know, to them, it's kind of for no reason. Just boxes of artifacts (C5).

Accountants in a CRM consulting firm regarding artifacts so disparagingly creates a moral and ethical dilemma whereby those required to care for objects in trust for the people of Ontario are devaluing the collections they accumulate.

Many consultants appear to believe that it is cheaper to keep collections in their private storage, especially those that have accumulated in the past before long-term storage costs were

budgeted. Whether this is truly cheaper than continuously having to find and pay for storage space is a matter of debate. Some participants do not think CRM archaeologists should have to pay for these transfer costs. “It's not the archaeologist's fault. This is ...where I love Sustainable Archaeology because ... it's a good idea. I just think it's ridiculous that they have to pay” (D1). However, some participants do not think CRM archaeologists should be absolved from all financial responsibility for transferring and managing collections. One noted:

If they want those artifacts, the collection, stored in perpetuity then they need to ante up the money..., and ensure that the facilities are there to accommodate all these collections from consultants, right? But does that absolve the consultants of any responsibility? No, like the consultants should build into their bids and it should be required (A3).

This financial dilemma with regard to repository costs can be attributed mainly to two problems; legacy collections and competitive bidding, both of which will be discussed further in the paper.

5.1.4 Ministries of the Province

For CRM archaeologists looking to transfer collections, it is unlikely that a MHSTCI office will agree to store them. Having the Ministry of Culture store artifacts was an option in the earlier stages of CRM in Ontario (Ferris, 2002, 58), but those facilities filled up quickly. “The Heritage Act is clear that the collections are the responsibility of the licensee until it's deposited in a public institution. So, there was all that mayhem in the ...80s and 90s, when the Ministry stopped accepting collections” (M1). As many participants pointed out, these offices are either already full of artifacts, have been shutting down, or have already begun transferring artifacts to other storage facilities such as Sustainable Archaeology. A1 also discussed the Ministry offices transferring collections to Sustainable Archaeology: “...the government paid Sustainable to take a lot of those collections, on that they did come across, and after negotiations ... transferred at so much per box to Sustainable Archaeology. So, all of those Ministry collections ended up there”

(A1). C5, who has experience in the Ministry offices and in consultant archaeology, stated “I mean all of the Ministry offices aren't set up to hold onto those collections either... you know, they shut down all of the labs” (C5). In sum, consultants cannot plan to transfer artifacts to Ministry public buildings.

5.2 CRM Long-Term Care

With the Sustainable Archaeology facilities being one of the only options for long-term disposition planning at a price, many CRM archaeologists remain responsible for the curation of their archaeological collections. However, their facilities are often designed as “temporary storage” yet are used as long-term storage, leading to the quality of storage for collections being less than ideal. “As of right now, uhm, it seems like everything is in temporary storage” (C5).

5.2.1 Quality of Collections & Storage

A concern among participants included packaging quality and a lack of recording standards for collections generated over 20 years ago by professional consultant archaeologists. As noted, these are also known as legacy collections. “...On one of the projects I was involved in, in the 80's, they were using fabric bags to hold artifacts that were in storage, and they had to come back, I understand, about 20 years later and repackage everything because the bags were just disintegrating” (M2). Collections that must be repackaged and have further processing require additional financial resources that may not be available. Also, legacy collections have not been budgeted to be transferred to Sustainable Archaeology and will have a higher cost to account for if they must be completely repackaged. Many of these collections are still the responsibility of licensed archaeologists, sitting in limbo or “dead storage,” or they could even be completely lost. As one participant noted:

Well, you know, 20 years ago [the archaeologists] were dying and dead. Now they're pretty much all dead... The collection was just assumed to be in the location of where they were employed, now that's long gone. And so, what happened to those collections over the years (M3)?

Currently, there is a lack of direction, not only on legacy collections, but most collections, once their original collector is no longer able to be responsible for them.

There are still challenges with the curation quality of collections in consultant firms even in more recent years. A2 discussed a collection they were studying that was excavated by a CRM company. A frequent issue they faced were discrepancies between what was in the report and catalogue versus what was, or was not, in the archival boxes. "... I kept coming up with new rims every single time, so it was like the report says 200-something, and I found over 600" (A2). A2 stated that this collection's excavation was completed in the late 2000's. Thus, it is not only older collections that are of questionable curation quality, but collections generated more recently by consultant archaeology may also have variable quality.

There is more awareness of the variable quality in legacy collections because they have begun to resurface. However, most recently excavated collections have not been revisited since they were taken from the ground. "It's very rare for [a] CRM archaeologist to dig stuff out of the ground [and] in the next year, publish a big, huge site report. That's so rare" (A3). More recently excavated collections may become "new legacy collections" since we are unaware of their current state and quality. One CRM participant noted in their experience:

...everything is going super quickly, so just dig up the stuff and get it out of the way before we put up a condo that you can't afford, you know, because you can't stop development. So, it's very much a half measure, and I think that the more that people go into research and use CRM collections, more we're going to find faults with, with that way of actually excavating and storing (C5).

With CRM archaeologists having to move quickly from one project to the next to meet the demands of development, there is little effort being put into the quality of collections management.

Some consultants have taken initiative on collections methodology. C3 discussed their procedures at the consulting firm where they are employed:

We have a pretty intense tracking process, so we have field forms that record the bag, the contents of the bag, and the provenience. And then we use those as soon as the artifacts come into the lab to make sure that everything is accounted for... we use polyethylene bags, uhm, and ... if we need buffered or unbuffered tissues, we use those as needed, or polyethylene foam also is a big one. We ...just stay away from all those materials that are just going to degrade... causing problems in the future (C3).

While some consultants may have collections in lab facilities with more intense tracking and packaging, participants also discussed how consultants store collections in personal homes, basements, attics, or storage lockers.

Whether it's true or not, there are a lot of rumors or assumptions that, especially in the past but even now, archaeologists are just taking the artifacts, putting them in a box and sticking them in the garage, or sticking them in their basement or sticking them in the storage room at their company like forever forgotten on a shelf (D2).

C4 discussed their employer's personal storage conditions when asked about their collections management methodology, "I know that everything is really well organized and in the basement. There is probably still stuff at their house" (C4). They also discussed their previous employer, a larger consulting company: "my experience is that people start renting storage lockers, uhm... like [redacted] had a couple when I was there" (C4). C5 also described their current and past employer's storage facility. "I've worked with small like mom-and-pop shops where it's like the collections are just filling up people's basements and they just get to be there" (C5). Regarding their current employer they said, "I would say that the air ventilation and like humidity control in our lab is basically nonexistent, and that's not good for artifacts"

(C5). V1 discussed collections in their possession. “I have some really early stuff that I never did get around to reporting. It's in the basement here... maybe I should write a report on it, but I'm thinking I should probably start boxing up the other stuff and repackaging and getting rid of it first [to Sustainable Archaeology]” (V1). With collections in private spaces, storage lockers, and other environments, sometimes with a lack of climate control, not only are they difficult to access for future research, but also at risk of becoming damaged or lost. C1 recounted an example of this happening:

...all of a sudden... [redacted] was in [their] mid 50's, [they] up and died one week. [redacted] was responsible for cleaning up after [their] artifacts.... So [redacted] went to [their] apartment... saw all these boxes lying around, didn't know what they were, and threw them in the garbage. So now... the collections [they] had are now sitting in the landfill... And this is horrible, like this is... the First Nations' history, like this is the province's [history]... just getting thrown out basically because of the lack of management (C1).

Consultants have limited options for collections transfer, and some appear to be compelled by their circumstances to find or create spaces to house collections that may not always ensure proper care and safety. Further, it is clear that some consultants have not been proactive in planning for the long-term care of their artifact collections in the event of unforeseen illness or death.

5.2.2 Competitive Bidding & the Outcome

If transferring to facilities such as Sustainable Archaeology is an expense some consultants are reluctant to pay, then why is CRM storage, even after decades, still in disarray? The main reason, as C1 suggested is “that money problem again, right” (C1). According to Ipsos Reid, 83 percent of archaeologists do not incorporate long-term storage costs in project budgets. Those that do only recover 10 percent or less of storage costs and have only begun to do so in recent years (Ipsos Reid, 2014, 11). Again, higher quality storage has a cost, and there is a lack

of funds going towards collections management from consultants due to the nature of competitive bidding: “what we see is the outcome of the bidding process, which is that archaeological assessments are often done by archaeologists who have lower costs, which means they also have lower quality and lower responsibility towards the work they do” (D2). Each CRM participant shared their thoughts or procedures on how they, or their employer, budget for collections management. The results are outlined in Table 13.

Table 13: CRM responses to curation in a competitive bidding environment.

Participant	Response to Bidding
C1	“Most of the time what I do is I put in a token amount, and I swallow the rest. I'll put in like \$500 if I'm planning out a budget of stage four excavation... like \$500 for a secure artifact storage. Which, in the long-term, is really very little money. I just eat the cost.”
C2	“You shouldn't be bidding on things you [haven't] found yet anyway. At least I don't... If we find something, then X. X is being budgeted in this... if we find something it will cost X dollar per hour to catalog.”
C3	C3 stated they do not read the proposals, however, they commented on how generally they think it works with their employer. “I don't think we actually include a cost of collections management. It's, I would say, it's built into the overhead for like lab techs and lab staff... having to move into larger and larger spaces, it's costing more, and then all of a sudden that little chunk of overhead you had in the budgeting with the lab tech um, billing out isn't really cutting it anymore.”
C4	“...their budgets are already big, so you add in whatever it costs to send some boxes, and the client's probably not even gonna notice... But I think for a lot of these small companies... they're always worried about the price because the small companies [are] in the competition with the larger companies.”
C5	“...from a proposal standpoint, we do charge clients for, you know, for boxes and bags and just to recover some of those costs... we charge a little bit to each client to spread that out, and then otherwise I mean the only financial burden that we have is basically the space that is taking up in the building that we lease.”

What appears to be lacking in all answers is a financial plan for eventual transfer of collections for long-term storage, or at least a budget for a long-term disposition plan. The packaging materials and “temporary storage” fees are only sometimes covered, not included, or eaten by the consultant during the bidding process. Some participants did mention the costs are covered in other ways, such as being built into the overhead, however, they acknowledged this is not sustainable due to their collections growing each year and having to obtain more storage space. In the earlier days of CRM, consultants could find institutions to directly transfer collections to without a cost (Ferris, 2002, 58). Now, with few options to transfer collections without a cost, consultants have become the long-term curators for these collections, but still often omit basic curation costs. This creates an underlying issue with archaeology becoming commodified and some consultants only making a living from digging sites through service fees, but not extending their services to long-term basic curation or producing further research results from the objects they have collected (Welch and Ferris, 2014, 101). As stated by the CAC and CAPC in their *Code of Ethics and Guidance for Practice*, conservation professionals must be financially responsible in their profession (CAC and CAPC, 2000, 9). By not allocating sufficient finances towards conserving artifacts collected in the field, this ethical obligation is not being upheld.

I wouldn't say they're [CRM archaeologists] curating collections. They're just packing them in boxes and storing them. My opinion has always been that that is not fair to the archaeologists at all, because they have to take care of them at their cost, and if anything happens to those artifacts, they can be charged, they can be liable for that, and they're not given any support from the Ministry (D3).

With consultants working in a competitive bidding environment, and current Ministry policy stating that licensed archaeologists must hold artifact collections until they can be transferred to public institutions, which are limited as discussed, collections are remaining in the

care of consultants with little to no planning for the long-term disposition of artifacts. For smaller consulting firms or individuals who hold collections in their private storage, the question becomes what happens to those collections when they pass away and do not have a long-term disposition plan? Some participants with archaeological licenses stated that they have resorted to leaving instructions for the disposition of artifacts in their wills after they pass away:

I [have] in my will...stop paying storage fees. Contact the Ministry and they can either take up the cost or... my company will pay for the movement of the artifacts to somewhere else... I don't want my family to be paying for these forever. It's not their fault, not their responsibility (C2).

By putting collection transfers in a will, the hope is that the responsibility for maintaining accumulated collections will not be inherited by someone in their personal sphere without an archaeological background. Participant V1 had a similar strategy, “what I might do is I might just put it into my will that I'm gonna leave it to Sustainable Archaeology and then they may come back and sue my estate looking for money” (V1). The purpose for willing collections to Sustainable Archaeology or to the Ministry is to pass along the responsibility of the collection so it does not become another lost legacy collection. “...Leaving it in their will is the way to not have their collections go into dead storage where they're not going to be curated properly, but also get the Ministry to take responsibility for them” (M1). According to Ipsos Reid, 73 percent of participants believe the financial responsibility for the long-term protection and curation of archaeological collections should be solely a government responsibility (Ipsos, 2014, 44).

However, amid this disagreement over responsibility, the state of many collections suffers from not receiving resources for care from either an institution or a consultant.

This situation leads to the question, What benefit is there to CRM archaeologists to store collections in the long-term? Participant C1 commented:

I guess if I was savvy enough, I could budget for long-term curatorship of artifacts, even though I might not win any bids... the greater problem is that by compelling archaeological consulting firms to be the curators of the material culture of the province is it severely limits the benefit of that material culture to benefit the province (C1).

It is becoming clear why many participants do not think licensed archaeologists should be ultimately responsible for collections. Again, the situation begs the question, What utility do collections have in the storage spaces of those who mostly earn a living through archaeological surveys and excavations and have little time or money to spare for collections management and research?

5.3 Accessibility

As the responsibility for artifact collections is primarily in the hands of licensed archaeologists who may lack adequate curation funds leading to poor physical storage of artifacts, archaeological collections have become less accessible leading to limited access to the archaeological record. As one descendant community representative commented, "...that narrative is currently controlled by a few people in Ontario, [they] control the narrative, which is problematic because there's all of that material and there's all of that data that that is just waiting, you know, for somebody to pick it up" (D3). Researchers and descendant communities have limited access to collections because they are in storage that is mainly only accessible to licensed archaeologists (Welch and Ferris, 2014, 99). Permission is often required to access collections by whoever is holding that collection, often a licensed archaeologist. While there are archaeologists that will grant accessibility to individuals, as one consultant pointed out, "the thing [is]...Not all archaeologists in the province are good people" (C1). The outcome of a policy that leaves licensed archaeologists completely in control and responsible for collections is that individuals are at the mercy of those licensed individuals for access to material that is meant to belong to the people of Ontario. This is particularly upsetting for Indigenous groups, which will be discussed in further detail later, and it is challenging for researchers. "...In my experience, a lot of times ... people don't go back to collections. Uhm, maybe sometimes for Master's work... But I think that's pretty rare, but maybe it wouldn't be so rare if these collections were accessible" (C4). Although many CRM firms in Ontario have a record of readily permitting access to archaeological collections, with the Ministry policy assigning licensed archaeologists so much control and responsibility, accessibility to collections is dependant upon the cooperation of the CRM sector.

Despite the restrictions on transferring collections, there are few restrictions on how and where licensed archaeologists can store artifacts. Site registration forms are completed through the Ministry's Past Portal system, which requires the archaeologist to list a location for the disposition of artifacts. For consultant archaeologists, this is usually their storage facility. However, it is a challenge to keep those locations updated when consulting firms or licensees move, and it does not account for what happens if a licensee can no longer be responsible for their accumulated collections. Further, the site registration form does not differentiate between the location of a collection at the time of site registration and a long-term disposition plan. If a consultant changes their storage location, a site update form should be submitted with the new location information, but that may not always happen. As one participant noted:

When you have no idea where it's going to wind up in the long term, you just put in your own storage facility. ...I should probably go back and change or do a site update for every one of the sites [so] that they do finally get transferred somewhere (C2).

In today's competitive CRM market, consulting archaeologists regularly move from one company to another, but do their collections move with them? It is not known whether the Ministry actually monitors the location of archaeological collections when licensees change locations. After decades of CRM activity, hundreds of licensed archaeologists excavating material, and the uncertainty with the accuracy of the Ministry's artifact collection tracking system (through Past Portal), artifacts may now be completely scattered across the province. One participant speculated, based on their experience, "I bet you the artifacts in the province are scattered in about somewhere between 3,000 and 5,000 different places" (C1). A3 discussed a project they were working on and the challenges they faced trying to access collections from public institutions and consultant firms, "they're here there and everywhere... And it's really frustrating trying to get information, you know, altogether... You know, from all these different

institutions...” (A3). With licensed archaeologists holding onto collections rather than transferring them to a long-term curation facility where they can be more easily tracked and accessible, the disposition of consultants’ collections may be ambiguous due to the lack of transfer updates in the Past Portal system.

5.4 Indigenous Concerns

This section will address Indigenous concerns in archaeological collections management. This section includes very strong opinions, feelings, and experiences that in some cases go beyond the subject of archaeological collections management. It is important to involve these difficult discussions as these broader topics are entangled with ideas about the responsibility for collections.

5.4.1 Indigenous Accessibility

As previously mentioned, the lack of accessibility is particularly upsetting for Indigenous groups trying to access collections related to their cultural heritage. Indigenous access to collections in CRM contexts often begins and ends during surveys and excavations:

...What happens during those archaeological assessments is that the artifacts that, in the nation's perspective, belong to the First Nation, are picked up by the licensed archaeologist and taken away. And that is the last time the representatives from this First Nation ever see or interact with those materials (D2).

Indigenous liaisons are required to be engaged in fieldwork during stages three and four of archaeological assessments (MTC, 2011, 3), however, there are no requirements for further engagement in collections management. It can become a long and tedious process to access collections because, often, it relies on a license holder, private business, or an institution granting permission for access. One participant noted, “...in terms of access, it's been very difficult, and it

depends on the proponent or on that agency... I mean, we've asked, asked for a simple Archaic point... five years ago, and that's still in process" (D3). Academic institutions can also be just as culpable when it comes to accessibility for Indigenous groups.

Now, there's a problem, because the University has the ability to gatekeep who goes in to see the collections. It's privatized, effectively, privatized. They also have this concept of a 'teaching collection,' which means that the collections are maybe being put to use in a way that's not actually respectful, and they may also high grade the collection and take out things that First Nations Indigenous communities may signal that 'actually we'd like that.' (M1)

This lack of control and accessibility to collections regarding Indigenous communities goes against the Ontario Archaeological Society's *Statement of Ethical Principles* and Mississauga of the Credit First Nation's (MCFN) *Standards and Guidelines for Archaeology*. The OAS *Statement of Ethical Principles* includes the following commitment:

We affirm that Indigenous communities have an inherent right to practice stewardship over their own cultural properties (including but not limited to: archaeological, spiritual, and historical sites, artifacts, designs, ceremonies, technologies, visual and performing arts, oral traditions and written and oral literature) and that said stewardship includes the right to maintain, control, protect, develop and have access to those properties (OAS, 2017).

The MCFN guidelines provide a statement to the effect that respect for the Treaty relationship includes collaboration on the stewardship of collections (MCFN, 2018, 2). Gatekeeping, refusing access, and taking years to disseminate knowledge and engage Indigenous communities goes against these terms. Without a Ministry enforced policy that licensed archaeologists and institutions must follow, limited access to collections remains a problem for Indigenous communities.

5.4.2 Hypocrisy

As mentioned previously, according to the *Archaeological Deposit Fact Sheet*, Indigenous cultural centres are considered to be public institutions where collections may be deposited. However, this has not always been an option.

...our community has been, with regard to wanting to receive materials and wanting to, you know, house our own artifacts and wanting to have them in community for... educational purposes, but also for the taking care of them properly, and being met with opposition, being met with that, 'you don't have the proper facility to do so. You can't take care of them yourselves. You don't have curation management policies in place. You don't have proper climate control. You don't have proper security on your doors' (D3).

With the addition of cultural centres on the *Archaeological Deposit Fact Sheet*, the notion that cultural centres are unfit to hold collections has changed. "It's getting better because [cultural centres have] been at some level recognized as an appropriate facility to store material and to house material" (D3). However, Indigenous representatives still felt frustration because of the hypocrisy inherent is the fact that strict curatorial standards were expected of Indigenous cultural centres while they were not, and still are not, expected of licensed archaeologists:

These archaeologists don't have to store them in any way. They don't have to care for them in any real way. And then they turn around and tell the First Nation, tell us that 'you can't have them because you won't take care of them 'cause you don't have the facilities to take care of them.' OK, well, do you have a climate-controlled curation facility? No, I don't think so (D2).

D2 further noted that, although they have some space, it would require substantial funds to create a larger facility to store artifacts at their community centre. When funds went towards establishing the Sustainable Archaeology facilities, this was upsetting for Indigenous groups who had been trying to receive funding to expand their own facilities.

...The whole Sustainable Archaeology project was a real slap in the face to First Nations because...we had been asking for years prior, for our repository closer to home to put our artifacts so that our people can go visit them. And the next thing you know, the

government is offering \$10 million to create Sustainable Archaeology, you know, down in London and down at Mac and without any regard for what we had been asking for years... So again, giving precedence and, you know, funding a Western style facility when they could have, you know, created an Indigenous run [facility]... at... a community (D3).

The Sustainable Archaeology facilities have involved Indigenous voices. The facility in London has created an advisory committee with half the membership comprised of Indigenous individuals who advise on policy and collections management (Graf, 2019). Though this is an example of excellent collaboration, it was accomplished outside of Indigenous control. As one Indigenous community representative noted, "...it depends on the goodwill of the institution or the archaeological licensee holding the collection" (D2). Rather than giving this control to an Indigenous community, the control and responsibility was given to a Western-style institution where it was up to the goodwill of the institution, who were not Indigenous, to collaborate and pass control and responsibility to Indigenous committee members. This familiar system of prioritizing Western control and responsibility over Indigenous collections continues and causes great frustration among Indigenous communities.

5.4.3 Living and Spiritual Artifacts

Certain artifacts require additional care and treatment due to their spiritual context. With many collections in make-shift storage, in some worst-case scenarios becoming lost, and others inaccessible, these living artifacts cannot receive this care that they need.

Some of those items are alive and some of those items need to be fed and some of those items need to have ceremony and some of those items need to see the light of day. Water, rain, sunshine, and you know they are being suffocated right now and they are dying... So that, that is something that, you know, the Western archaeological mind hasn't really wrapped themselves around yet (D3).

D3 also discussed that added care of spiritual artifacts must begin immediately in the field:

So, when you're uncovering these things that otherwise may have some sort of spiritual energy attached to them, the protection of your human spirit and your presence in this life is of concern to the elders, so there's often a lot of spiritual teachings that go along with working in archaeology and working in the field (D3).

As noted, the OAS *Statement of Ethical Principles* states that Indigenous communities have an inherent right to practice stewardship over cultural property (OAS, 2017). However, licensed archaeologists are not required to provide specialized care for spiritual artifacts in collections management or on site. I asked D4 if there was need for policy in this area:

Yes. Blanket yes, yes, absolutely. There are artifacts and ancestral remains that require ceremony and typically feasting... We're not saying like that would be millions of dollars. It's like, it's like a small package of berries and some wild rice (D4).

Currently there is not a Ministry policy upholding an ethical approach to addressing the spiritual needs of living artifacts; it depends on the goodwill of the archaeologist once again.

There are a few good actors who seem to have a heart, who seem to have ethics, who seem to have morals. But on the whole, most of the companies operating, at least in our area of the province, uh, it's a business and what I have seen in the field when they're excavating those artifacts [is] ... that they don't care for them and respect them in the same way as the First Nation, who is the descendant community [and] has spiritual connection to those artifacts (D2).

Without a Ministry policy enforcing ethical principles, such as those of the OAS and MCFN, licensed archaeologists are free to continue storing living or spiritual artifacts without providing them with special care.

5.3.4 Consultation and Collaboration

Each topic discussed in this section involves consultation with Indigenous groups. I asked participants about how they have consulted Indigenous groups in their curatorial and archaeological work. In Table 14 below are comments some participants made regarding

Indigenous collaboration. Not every participant is included as not all talked about consultation and collaboration positively.

Table 14: Participant's comments regarding consultation and collaboration with Indigenous communities.

Participant Code	Discussion of Consultation and Collaboration
A2	“Engagement with First Nation[s] I think it's gotten better over the years, 100%”
A3	“...they develop friendships, relationships with archaeologists from different consulting firms... that are often friendly, ...”
C1	“...in recognition and respect of the First Nations in their history, which is why I dedicated my life to studying like the prehistory of Ontario, I owe it to every First Nation to work with them, not just inform them, not some token letter, but work directly with and that's why I do throughout the archaeological process and with the disposition of all artifacts, right? It's my ethical obligation to involve them.”
C2	“[The Indigenous] communities here, whose repository right now [is] completely full... I'll buy a sea can, put shelves in it... So at least it's part of the repository and it goes back to them.”
C3	“We are definitely open to like, request[s] to access collections or transfer collections.”
C4	“There's a movement right now in Ontario archaeology. I don't really know how successful it is, but this idea of decolonizing, I don't think we can do that without asking [Indigenous] opinions about how, well, not only how we should be doing archaeology, but what happens with the material.”
D1	“Usually, [consultation is] coming right from the archaeologist who has the collection, and I have noticed they tend to have very strong feelings from where they would like these collections to be.”
D3	“...our liaison wanted, had asked to do a ceremony... The project manager ended up asking him if they could participate and it turned into this like beautiful moment of a shared experience and education at the same time... So, I think the whole field crew, as well as the project management team, came to experience that ceremony with our liaison, you know, so that was that. And that to me, is that what engagement on an archaeological site is all about.”
M1	“So, the proactive [Indigenous] communities, they do get a positive response. They get more of a positive response from the [Royal Ontario Museum], from the Ministry...”
M3	“...when somebody starts a survey, they file a PIF and now the Ministry forwards that on to First Nations that... consider an area where that work is being done as their traditional territory, or modern reserve lands.”
R1	“We're starting to work on [consultation] because it's, it's an important part and it's something that we do get requests for as they come through our collection, and so we have over the last couple of years, developed a diversity statement for our site and are working towards [that].”

R2	“You know this, from the one angle, this settler institution, colonialist institution is holding Indigenous materials, but on the other hand, if there can be a partnership in agreement, then maybe we're mainly holding that, the lithics and the body sherds or something, uh, less sensitive, and then other collections, other kinds of collections may be rotated to those communities, maybe for displays or other purposes, or other places, and we might be able to do both, satisfy the space that it takes, continue research, but also give Indigenous communities a real voice and in what's happening and not make it like a barrier ... that we're holding it. Certainly, we've always said we don't own this stuff.”
R3	“Like anything that we write on, you know, Indigenous history needs to be told to us by Indigenous people, we're not going to speak for them. That is not, it's not our, it's not our history so we can't speak for them, so it needs to be done in collaboration with experts and the community... Yeah, it definitely needs to be a collaboration.”

Participants discussed a wide range of types of collaboration with Indigenous communities that have occurred in recent years. Many discussed the importance of involving Indigenous voices in the archaeological narrative and decolonizing the discipline. There were examples of positive collaborations with CRM archaeologists and curators who provide accessibility upon request. Curators also discussed improving their policies to be more inclusive. The Ministry has improved their policies by deciding to share PIFs with Indigenous communities. These positive examples are important to consider to further improve collaboration with Indigenous communities on collections management, and with regard to archaeological research overall.

5.3.5 Lack of Collaborations and Consultation

Participants also discussed the lack of consultation with Indigenous communities about archaeological collections management. Each participant group will be discussed separately as each brought their own unique perspective. It is also important to carefully consider these examples of inadequate consultation to understand why and how they are occurring. Again, not

every participant discussed a lack of collaboration and consultation, thus not all participants will be listed.

Table 15: Academic and avocational responses to lack of Indigenous collaboration and consultation.

Participant Code	Lack of Collaboration and Consultation Discussion
A1	“...in the old days, there was not that concern. It really wasn't. I mean... I knew First Nations people and I; I interact[ed] with them, but I wouldn't ... say ‘oh, I'm digging this...site. Would you like to come up, and see?’ Or that sort of thing, and... at some level, all academics will [consult First Nations] because I think they are ethically responsible people, if they're good... but there's nothing, it's not like with CRM where you're forced to have monitors and stuff.”
A3	“... [the policies are] outdated. They need to be updated but they need... a lot of input, like I say, because the bulk of the collections are Indigenous, of Indigenous origin. They need a much stronger voice in the creation of new policies around the management of those collections, you know, that aren't just negotiated between those two facilities at Western and McMaster...”
V1	“[I] haven't been as active as I could have been [in relation to consultation with Indigenous communities].”

There are two main themes that academic and avocational participants discussed; not being as engaged with Indigenous communities in the past, and a lack of Indigenous representation in policy and planning regarding archaeological collections management. As A1 pointed out, CRM archaeologists do have some requirements to consult Indigenous communities during surveys and excavations, however, academic archaeologists do not have this obligation. As A3 notes, within these requirements and planning for the disposition of archaeological collections, Indigenous voices have not been represented well enough. As a result, some individuals have not been as active as they could have been in engaging Indigenous communities in their studies.

Table 16: CRM Responses to lack of Indigenous collaboration and consultation.

Participant Code	Lack of Collaboration and Consultation Discussion
C1	“...it seems like folks in [redacted] are scared, or at least they were scared of First Nations... I talked to folks, I'm like ‘well, why don't we just give ... [an Indigenous community] a call or whatever?’ [They say] ... ‘oh, we can't do that.’ Or if they heard that there was a First Nations person around, [they say] ... ‘oh, what did they want?’ ...What do you have to hide? ...if you're doing an honest job... just involve the First Nations...It's crazy to think about an archaeologist devoting themselves to studying the First Nations history, but at the same time being mortally afraid of First Nations.
C3	“I mean, descendant communities are kind of notified on where their collections, where the collection is going to go and how it's stored, but there isn't too much action after that. So yeah, it's definitely an area where there needs to be more involvement, but I'm not really sure what that might look like.”
C4	“...in my experience, descendant communities have never been involved at all... I think that people probably honestly try to avoid it as much as possible because One, they might not get the answer that they want, and two, it's just another opinion in the opinions that ... already can't agree. Especially with Indigenous material.”
C5	“I do know that... Some archaeologists do throw out like crumbs, crumbs of ceramics, yeah... like Indigenous ceramics... the nondiagnostic... little, tiny pieces. I feel uncomfortable with that, but I do know that happens.”

C1’s and C4’s comments reveal some of the attitudes that some archaeologists in Ontario CRM archaeology have towards consultation with Indigenous communities, beyond just consulting on the disposition of artifacts. For some in the industry and discipline, there is an aversion to consulting Indigenous groups. Coming from a CRM background, C4 believes this aversion is because of the fear of hearing something undesirable, causing disagreements and possibly delays on the business side. C3 also discussed that there is a lack of consultation with Indigenous groups about the long-term disposition of Indigenous collections. For C5, I included this statement about licensed archaeologists throwing away material because it is being conducted without the permission of First Nations. It is also a result of the aversion of licensed

archaeologists to consulting with Indigenous groups to avoid hearing an answer they would rather not hear.

Table 17: Descendant community representative’s responses to lack of Indigenous collaboration and consultation.

Participant Code	Lack of Collaboration and Consultation Discussion
D2	“...there are tons of archaeological licensees working in the province of Ontario... who would never respond to a request where we say, ‘can we access those materials? Can we see them? We interact with them?’ And that would just be a flat-out no. So, it doesn't happen often... They don't hold the opinion that it's the right thing to do.”
D3	I asked D3 how they or their community have been consulted regarding the long-term care of archaeological collections. The response was “Zero [consultation]. There’s nothing to say there.”

Again, some of the descendant representative’s comments and experiences could be the results of the adverse attitudes mentioned in the CRM comments that exist in the industry. D2’s discussion, and D3’s comment, can be tied to C4’s comments about how some consultants try not to involve descendant representatives in collections management to avoid adding another opinion or task to the many that a consultant may have to consider. Both expressed frustration with the lack of consultation their representative communities have had with collections management and accessibility.

Table 18: Past Ministry employee's responses to lack of Indigenous collaboration and consultation.

Participant Code	Lack of Collaboration and Consultation Discussion
M1	“...if we're going to have actual reconciliation with Indigenous communities, we have to really sort of get off our - because even I'm sure some of the people that have said to you, “yeah, we need regional repositories. We need, you know, clear direction we need Indigenous involvement, control.” Those [people] still feel they privilege archaeology over Indigenous discourse about heritage and history. There are an awful lot of people that I've talked to... who have said, you know, “well they don't know anything about archaeology.” And my only response is they don't have to know. You're the technician.... You're not the

	overlord. You're just a technician. Go dig holes, screen the dirt, bring the stuff back, and maybe together we can come up with an interpretation of it that is meaningful, because clearly all of these boxes in... all of these basements and all of these garages are not being used to advance an archaeological narrative.”
M2	“...there's very little communication going on with regards to collections management, at the moment...from the Ministry. Um, I'm not just talking about myself, I'm talking about, you know, emails sent by Indigenous groups and not being answered or being answered in a forlorn, I would say dismissive [way]... you know [a] ‘will get back to you’ approach.”
M3	“I knew [the Ministry] did a lot of work with descendant communities in other cultural areas, but I don't know how close the relationship ever was around collections. I mean, I think, I think it was a don't-ask-don't-tell... So, CRM archaeologists had the relationships with communities, but the Ministry sort of stayed out of that relationship.”

The lack of consultation with descendant communities in collections management and archaeology from the perspective of past Ministry employees, once again, appears to be attributed to this aversion mentioned previously between some CRM archaeologists and descendant community representatives. M1 described their personal experiences with this aversion and links it to traditional thinking still lingering in the industry. M2 and M3 discuss the Ministry’s avoidance of consultation on collections management, and their apparent preference to leave that responsibility with consultants.

Table 19: Curator responses to lack of Indigenous collaboration and consultation.

Participant Code	Lack of Collaboration and Consultation Discussion
R2	“But the piece about having Indigenous perspectives on collections, research and analysis, I think that we still have a little ways to go. In fact, a long way to go, yeah.”
R3	“We really need to improve our, I feel and my manager feels, that we really need to improve our Indigenous relations and get more people. ... that's an area of improvement that we need to do, both in the community and collections wise.”

R4	“I couldn't get a First Nations course through [University]... So, I don't feel like- I know some people that work, you know, down in [an Indigenous community]. But I don't feel like I have a, uh, any sort of, a connection with people down there, right?”
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Despite the aversion to Indigenous consultation shared by consultants and the Ministry, curator participants did not have the same attitude, rather they acknowledged that collaborations have been lacking in the past and are now working towards improving their relationships with descendant communities. Initially, outreach to curators was met with disinterest in participating in this study, so this sample surely does not represent all views in curatorship in Ontario. I would argue that the initial reluctance to participate was because museums and archaeology are so separate in the province. Among curator participants, there was a strong desire to have more collaboration with Indigenous communities and nearly all discussed methods and policy they were working towards aimed at having more collaboration.

5.4 The Ministry

An often-discussed topic in the interviews was the Ministry’s role and policy in Ontario’s archaeological collections management. This is unsurprising given that many of the interview questions involved the Ministry. My rationale in asking more questions about Ministry policy and standards was simply because the Ministry is the body that has delegated responsibility for archaeological collections.

5.4.1 What is Working

Participants were asked what they think is working well with the current Ministry policy in Ontario collections management. Admittedly, when I asked this question, I often received either heavy sighs, laughter, and/or long pauses. However, participants also listed more specific

positives about the policy. A persistent theme with the positives that were discussed was that certain “ideas” or “concepts” in the policy were acceptable.

One positive aspect is that the policy recognizes that licensed archaeologists do have a responsibility to care for collections after they have been accumulated in surveys and excavations. “I think that the way they're written now are fine, that the license holder is responsible for the collection until it's transferred to a public body or a public institution” (M1). The policy also suggests collections should eventually be deposited into a public institution for long-term care to be held in trust for the people of Ontario. “I think ... the legislation is reasonable that this needs to be maintained for the people of Ontario. Uhm, so, it needs to go into some kind of public institution” (R4). Many participants thought that the Sustainable Archaeology facilities were an excellent option for this idea. “what's working well as, you know, for me is when those Sustainable facilities were created” (A3). With the policy implying collections will eventually be transferred, and with well-equipped facilities with Indigenous partnerships listed as an option for the curation of collections, some participants noted that mechanisms are in place for an effective system.

The transfer process itself is has been noted as effective by some participants. “I've liked that the transfer form is very... detailed. Uhm, I've never had issues completing it or people that are unfamiliar with it can also [complete the form]. It's easy enough to navigate” (C3). The deposit form also requires that Indigenous consultation be conducted on where the collections will be located. “So, it's going in the right direction for us, because there is this acknowledgement that we should be consulted” (D1). The deposit form is also effective in keeping collections from “not making their way into the hands of private individuals, or for sale”

(D2). The idea with how the tracking process is supposed to work using Past Portal was also seen as a positive:

I think the overarching (pause) sort of rationale... is great in the sense that artifact collections need to be tracked. Uh, so if a licensee no longer has the material [that] needs to be updated in [Past Portal] and then for all to see this sort of thing, if you log in and you should be able to know exactly where that collection is (R2).

Whether this accurately describes how the policy is being operationalized is a matter of debate, given concerns about the accessibility of collections expressed by some participants (see Section 5.3), however, the foundation of a digital tracking system for collections is at least present in the Ministry system.

5.4.2 Ministry Policy Negatives

As mentioned, negative aspects of the Ministry policy were the most discussed topics, and the only topic discussed by all 20 participants. Before discussing issues with the Ministry policy, it is important to take note that, at certain levels within the Ministry, there is a lack of resources. R2 discussed employees trying to keep up with the number of forms that are required to be submitted to the Ministry: “I think I've come to see, I guess that the folks who are in involved with actually taking these forms in are maybe overworked, understaffed, so I think I see a bottleneck” (R2). Issues of allocating resources in provincial Ministries goes beyond this project’s scope, however, it is important to note that the lack of resources in the Ministry may be contributing to many of the policy negatives discussed in the interviews.

Some participants noted that they have seen effort from the Ministry in “lower management levels.” However, there is a gap in most government agencies between these lower levels of management and the “higher management levels.”

...People at the managers level and below are facing the public... and the [people] at the... director level and above, they're facing the politicians. So, that's where the gap

comes. So, we can get the manager of the archaeology unit to say ‘yes, I’m all for it.’ But then there’s this little gap that they have to jump across to get anything done (M1).

While considering criticisms relayed from participants about the policy, these political dynamics are also important to note as it appears to cause additional challenges in addressing negatives within current policy and regulation.

Common complaints about the existing policy are how it is outdated and not in touch with reality. “It’s outdated... It’s very idealistic too, and it doesn’t deal with the real world so much does it” (A3). One example of this is found in the *Archaeological Deposits Fact Sheet* which states, “collections acquired under one licence cannot be transferred to another licensee nor can they be deposited with private businesses or individuals” (MTCS, 2018, 2). This practice actually occurs frequently among licensed archaeologists working for private consulting businesses. Through the licensing system, collections acquired under a license become the individual licensee’s responsibility. However, if they are working for a private consulting firm, responsibility for those collections is often “transferred” from the licensed individual to the private company through agreements between licensees and companies. If the company holding the artifacts for the licensee wishes to transfer collections to another facility, they would require the original licensee’s signatures on the transfer forms.

I’m no longer with the consulting company I was with... when I was generating material on my license. I don’t have those collections with me. So, they’re with the storage areas of those companies... So, in a way, I’m personally in breach perhaps because I’m not physically looking after those collections (R2).

C4 also commented on this restriction against transferring collections to private businesses:

“...it’s not working at all because no one’s doing it. Yeah, that’s crazy. I still can’t believe that’s actually written down. I think it’s not working because it’s not, it’s just not how things work anymore” (C4). This is not to suggest private consultant companies should not have the ability to

store collections that their individual licensees collect. As C5 discusses, individuals do not have the resources to store potentially hundreds of boxes of artifacts: “I can't fill my condo up with bankers' boxes of artifacts” (C5). This is also not to suggest that transferring collections between private businesses should be accepted. Rather, this is to identify that there are processes involving the transfer of responsibility for artifact collections that technically violate the existing policy, and these occur regularly in the day-to-day business of CRM archaeology.

The fact that there are so few public institutions for licensed archaeologists to deposit their collections in, yet the policy suggests that they should do so, is another example of the Ministry policy being more ideal than realistic.

[The Ministry] says you have to collect all this stuff and you need to find a repository, but we're not [going] to ensure that there are any for you to use. Uh, the issue? They say you have to do it and then they make it impossible to do it (C2).

With only two primary facilities for the entire province of Ontario that involve a cost that some consultants are reluctant to pay, this leaves licensed archaeologists holding collections in perpetuity. As many participants discussed, individuals and companies holding collections “in perpetuity” is problematic, since it is impossible to live in perpetuity and companies are at risk of losing their business. “...The policy of... you know, for keeping them in perpetuity. What's that mean? Well, it doesn't mean anything really, because we have limited lifespans and companies, companies have lifespans as well” (A3). The current policy offers no clarification on what is supposed to happen to collections when a licensed archaeologist suddenly passes away, if their business fails, or other circumstances occur when they can no longer care for collections.

Everything is um, is tied to the licensee and there's basically no mechanism in place, uh... if the licensee passes away, or even you know... I know a number of archaeologists who've moved provinces too or move to the States (C5).

The only clarification provided is that, according to the Heritage Act, the Minister may direct collections to a public institution (Ontario Heritage Act, R.S.O. 1990, 66[1]). Again, this is another example of the policy being somewhat unrealistic because the Minister generally does not perform this duty of directing collections to be deposited, unless requested to do so by a licensee in a *Licensee Request for Minister's Direction to Deposit an Archaeological Collection* form (MHSTCI, n.d.). I asked M1 if, in their experience, the Minister has ever directed collections to be deposited in an institution, other than those requested to be deposited by a licensee as part of a transfer. Their response was “yeah, never happened” (M1). A1 also commented on whether the Minister would direct collections. “I don't know that they would ever do that because the CRM people would say ‘well who's paying for this’” (A1). Again, it could be ideal that the Minister would direct collections from potentially unfit temporary storage to a proper facility for long-term care, however, there are no mechanisms for this to take place, beyond it being mentioned in the Terms and Conditions of archaeological licenses.

One of the most discussed negative aspects about the Ministry policy was the fact that standards and guidelines for collections management do not exist for licensed archaeologists. One descendant community representative was particularly critical of the lack of collections policy:

Well, it's not working well because there's little to no policy. Like it... it's really flat. It's really not comprehensive. It's really, there's no guidance... It doesn't provide for anything. Like, it doesn't provide for proper care. It doesn't provide for the capacity for archaeologists [to] do so. It doesn't provide for the spiritual care that some items need. You know, it doesn't provide for access (D4).

When I asked C3 about their opinions regarding the positives in the Ministry policy, their initial answer was, “this question actually tripped me up for a minute because it made me think like

(pause), is there a collection policy that I'm, like a document, that I'm just not aware of' (C3)? As mentioned, licensed archaeologists do not have to follow a set of curation standards as they do with the *Standards and Guidelines for Consultant Archaeologists* for archaeological assessments, thus leaving consultants to curate collections how they see fit.

There are some mechanisms in place to ensure that consultants are holding collections in safekeeping. The Ministry can inspect fieldwork or a facility, according to the *Inspections Fact Sheet* (Appendix D). Inspectors can enforce Part VI of the OHA (which includes Part 66[1]), the *Terms and Conditions for Archaeological Licences*, and the *Standards and Guidelines for Consultant Archaeologists* (MTCS, n.d., 1). If non-compliance is determined, the licensee may receive a written or verbal request to correct concerns or will be requested to provide a formal report to the Ministry (MTCS, n.d., 4). Collections management is mentioned very briefly in the terms and conditions, again simply stating that licensees must keep collections in safekeeping (MTCS, 1990, 3). The policy does not go further to suggest what that means, making it difficult for inspectors to enforce such a vague standard. There are also no specifications on what penalties the licensed individual would receive or what would happen to their collections in the event of non-compliance:

... I think it stems with the fact that if you don't have a specific outline, you can't really, there's nothing to enforce off of... They do say that they can come inspect your laboratory. But I've just never heard of it [happening] (C3).

It may be due to this lack of standards, along with limited resources, that facility inspections are rarely conducted by the Ministry.

With the Act stating that collections “may” be deposited in a public institution, without a requirement or clearer delegation of responsibility enforced by the Ministry, collections are allowed to remain in consultant storage. As R2 noted, “Certainly, there's regulation for licensees

to be responsible for those collections. But there's no real regulation for them to deposit anywhere, other than their own storage areas... (R2).

As previously discussed, there are a number of concerns participants have with collections mostly remaining in consultant storage, such as becoming lost or sitting for decades in sub-par conditions. Another concern that is also not addressed in the policy is the inadequate access to collections and the scarcity of research being conducted. This lack of research on CRM collections and the absence of required research is another negative in the Ministry policy that participants disliked.

...it's very much lacking because... there's no research anymore, that's problematic... archaeology started in Ontario through research and through museum grants, and you know, through the uncovering of the archaeological past and creating... the archaeological record and the narrative. But then, once CRM hit as being... 90% of archaeology or more is done by... Cultural Resource Management companies, and the research component is not included in the work that they do (D3).

Without requirements directing that collections must be transferred to a public institution and the existing policy implying that these transfers are optional, accessibility and research are likely to remain limited.

5.4.3 The Ministry Stepping Back

The idea that the Ministry is removing itself from archaeological responsibilities was a topic discussed often, particularly among participants with experience working in the Ministry. Participants discussed three points that underline how the Ministry has attempted to remove themselves from their responsibilities: avoiding repatriating collections to First Nations, avoiding their responsibilities in their role in collections management, and passing their responsibilities on to consultant archaeologists.

There are frustrations with the lack of action taken by the Ministry to encourage repatriation of artifacts to First Nations. “I think with Indigenous collections, ... it opens up another avenue that's not covered because the Ministry studiously avoids it, which is ‘what do we do with the Indigenous aspect’” (M1). From an archaeological perspective (which of course is a post-colonial one in the Canadian context), repatriating artifacts involves many challenges, including deciding who has the authority to make decisions about repatriation, determining the “ownership” or cultural affiliation of collections, and finally, determining where collections could or should be repatriated to. Some Indigenous collections have multiple claims as to which Indigenous group the collections “belong to”, or which group is most closely related to the site that yielded the collection.

As a post-colonial government with authority over Indigenous collections established by the Ontario Heritage Act, the Ministry is in the difficult position of determining how collections should be repatriated. The Ministry does allow licenced archaeologists to transfer collections to Indigenous cultural centres on federal reserve lands, and museums are capable of repatriating artifacts to Indigenous communities, thus the existing transfer system acts as a mechanism for repatriation of collections in some cases. But, by not taking a more proactive role in repatriation, most collections are not repatriated and are held in limbo. One curator highlighted the complexities involved:

So, when you get competing claims, what happens? ... We can always be charged with being an institution that holds material hostage essentially... Which is not what we want to be seen as. So... I think that... could be enhanced with [Indigenous] connections (R2).

All participants who discussed Indigenous collections with overlapping claims agreed that conversations about ownership must include members of Indigenous communities.

I think that ultimately the responsibility, or at least meaningful consultation and direction, needs to come from Indigenous communities... that, I mean in and of itself, that can pose some problems in terms of determining which community is properly entitled to it. But at the end of the day, it's our history (D3).

Despite the complexities in repatriating artifacts, the Ministry has a role as the governing body over these collections, and thus must have a responsibility to be proactive in the process in returning artifacts to First Nations.

Some participants discussed certain actions taken by the Ministry in the past that were conducted to remove themselves from their responsibilities in collections management:

So [the Ministry] started with the Ontario Heritage Act in 1975. They started building a series of a network of regional archaeologists and it was probably by, oh, 1978 or something... But [the Ministry] started hiring people that were going to scale it back and close it down. They would... hire people who would come in and say 'my stated purpose is to shut this down. It's costing us money'.... and so, you know, there was that. And it went on (M1).

Some participants believe that the 'money problem,' how expensive collections management can become, is what is causing the Ministry to step away from their responsibilities:

... [The Ministry] were also concerned that it was very expensive to do, and to maintain the collections was very expensive and they weren't getting the same bang for the buck... There's no [monetary] value in it. And that was part of the Ministry's retreat from that, as they started to wind up the regional lab system, they wanted to get away from that (M1).

M3 also discussed their perspective about the Ministry avoiding collections management:

My sense was the collections management stuff was just really something [the Ministry] tried to not get drawn into because they had nothing to do, they had no money and they had no... to use an awful government term, there was no 'appetite' to get into that role or relationship because they had nothing... to bring to the table (M3).

M2 also noted that they also have seen the Ministry attempt to, somewhat successfully, remove themselves from archaeology in general:

First of all, [the Ministry is] basically out of the archaeology business, at least from a field standpoint... My manager and my manager's manager did not like archaeology... you've got the issue of internal commitment and lobbying within the government, and the

issue of senior management champions around the financial table, whether it be provincial or federal... Although federal tends to be a little better overall (M2).

The evidence of the Ministry actively attempting to absolve themselves of their responsibilities in Ontario archaeology is quite alarming. As discussed, this is evident in the Ministry shutting down their regional archaeology offices, the Minister never having required transfers of collections to public institutions, and the Ministry's apparent reluctance to conduct laboratory or storage facility inspections. The Heritage Act states: "the Minister is responsible for the administration of this Act and may determine policies, priorities and programs for the conservation, protection and preservation of the heritage of Ontario" (Ontario Heritage Act, R.S.O. 1990 1[2]). M3 speculated about the role of the Minister and if the Minister could be directed to uphold the Heritage Act regarding archaeological collections:

... A policy person did say to me, you know about that part of it [where] the Minister can direct a licensee. [They] said 'I wonder if [a] community ever sat down, maybe with a lawyer, and looked at that language and said, let's write the Minister and direct him or her to move this collection to this place' (M3).

The Ministry certainly has a responsibility to ensure that archaeological collections are held in trust for the people of Ontario, although how the Ministry is meant to conduct this responsibility is unclear. Without the Ministry practicing as an authoritative body to protect collections from becoming lost or mismanaged, long-term management and compliance relies on the goodwill of the archaeological consultant, which is evidently not always going to occur (Miller, 1990, 216).

With the Ministry no longer accepting collections from consultants, shutting down the regional system, closing their regional offices, and transferring their collections to other institutions such as the Sustainable Archaeology facilities, the responsibility for the majority of collections now lies primarily with licensed archaeologists:

The government has, ... I guess the government absolved itself of any responsibility. They've kind of... I see it as deputizing, almost... when you get an archaeological license, you've been deputized by the province to care for anything... so it's trusting too much I think, trusting individual archaeologists to do the right thing to uphold the standards and guidelines (A3).

M3 also noted this in their experience:

...I think people had started to hope that there would be the smaller facilities, and that's where collections could go, but... [the Ministry] didn't sort of step up and say 'yeah, that's what we want to do, and we really want to get involved.' They just sort of left it... in the, it's the responsibility of the license holder to do it in trust as good stewards, and then they just kind of ... [said] 'okay, you guys talk, but don't bother us' (M3).

One participant noted that efforts to improve collections management and encourage repatriation were coming from select licensed archaeologists and First Nations. "The effort is coming from the First Nations and some of the archaeologists themselves, not the Ministry, in my opinion" (D2). However, it is evident, by the state of temporary storage and aversion to further engagement, that not all consultants practice ethical collections management or Indigenous consultation on collections management. Most participants in this study, who are also active stakeholders in collections management, do not believe it is acceptable for licensed archaeologists to be ultimately responsible for Ontario's collections. If the Ontario government is attempting to remove themselves from their responsibilities for the management of archaeological collections, which they are meant to protect for the people of Ontario, and the Ministry also avoids taking action by way of meaningful policy or consultation, pushing that responsibility onto licensed individuals, I argue the collections crisis will only continue to grow as it has been for decades.

5.4.4 Expectations of the Ministry of Heritage, Sport, Tourism and Culture Industries

Two of the interview questions asked what participants expect from the Ministry and what changes they would like to see in their collections management policies. One of the changes participants would like to see is a review and update of the existing policy so it more accurately reflects how archaeology is conducted. Participant C4 stated: “what are my expectations from the Ministry? To reflect honestly how work is being done...” (C4). Though the policy has been effective in restricting transfers to avoid collections falling into the hands of collectors, it has technically not been effective in preventing transfers occurring between licensees and private CRM businesses. The policy may require a mechanism for individuals to legally transfer collections to private consulting companies, or it should have mechanisms that guarantee collections will go to a public institution instead of a private consulting company. It is also safe to predict that there will be future paradigm shifts in the study of archaeology, as with most disciplines. In the future, collections use and utility will likely have a different meaning than today, and reviews of the policies could include preparation for these changes so the policy does not keep falling behind. As A2 stated, “... a framework then needs to gradually or provisionally be revised to maybe think about again, going back to just the archaeological materials, what do we want it to be” (A2).

Another change some would like to see is a “standards and guidelines” type of policy outlining what the Ministry considers safe and secure collections management for licensed archaeologists:

All they need is some more specific standards for what they mean by safety. That sort of thing. I think there's a good foundation and, you know, acknowledgement of a lot of key components of curatorship, but just need specifics (C3).

Definitions of what safekeeping looks like in consultancy, what kind of packaging materials to use for specific types of artifacts, and what types of items require spiritual care are a few things that participants would like to see regulated in CRM collections management. Many participants would also like to see these curatorial standards be included in the bidding process in consultancy. As previously discussed, CRM archaeologists' budget for collections management in various ways, or not at all, often leaving little to no funds available for basic collections management standards. "There should be regulations that say if you're going to make a bid on these, you have to put in as part of your bid a reasonable amount of money on [curation]... A guideline would be what would Sustainable [Archaeology] charge you" (A1). With regulations ensuring that some funds from budgets are designated for collections management in CRM and that curation standards are followed, all consultants would have to allocate resources to collections management without potentially losing on bids.

If everyone was doing it, if everyone was building that into their cost... uhm, then it wouldn't be a thing anymore and clients just pay for it. But when there's still, when it's not consistent, when not everyone is doing it, then no one is doing it (C4).

Along with wanting curatorial standards, participants also stated that there must be enforcement conducted by the Ministry that goes beyond a license report review process. In her investigation into the CRM industry in Ontario, Birch interviewed a participant who stated, "some of the worst archaeologists write the best reports" (Birch, 2006, 70). Inspections and reviews of licensed archaeologists ideally should be conducted in person by an official inspector, armed with a more rigorous collections policy.

It would be really nice to have... I don't know if they would be called 'compliance officers' or what have you, but you know, enforcement officers that go out and check up on the storage facility of the... archaeologist and check up on the conditions in which... this material is being stored (D3).

With a specific collections management policy to follow, inspections conducted by the Ministry in curation facilities and labs would have the tools needed to implement non-compliance measures if a licensee or facility was not holding collections in safekeeping.

Participants expect the Ministry to take the lead on providing direction in two key areas in Ontario archaeology. The first, again, is providing direction in First Nations engagement and consultation. “It should be the Ministry though... getting those agreements nation to nation, so to speak. Not an archaeology facility, right, making those agreements... But in reality, that's what's happening” (A3). Having a stronger acknowledgement of the importance of engagement and consultation, providing further guidelines for how consultants should engage and involve Indigenous communities in collections management are all functions that the Ministry should provide.

There's so much disagreement... disagreement not necessarily in a bad way, but like different ways and opinions of how to go about and do things... at least with archaeological materials. And accounting for the heritage, the value of heritage as it relates to archaeology. So, I feel like ...the language needs to be revised... (A2).

Though some consultants and facilities, including the Sustainable Archaeology repositories, have been establishing effective consultation with Indigenous communities, it was largely done without the guidance of the Ministry.

The second area in which Ministry direction is sought, is in providing a long-term care plan for collections after a licensed archaeologist either passes away, loses their license, or goes out of business.

So, the more work you do, the more... responsibilities of boxes and boxes and boxes and boxes and boxes of stuff you have, and then ... you have to think about that even when you're dying? Like, that's awful. I really think that the Ontario government should be having more of a responsibility in that because... If it's important enough that the government has a Ministry, and it's important enough that they've made the rules, then they should also take... some of the responsibility of storage (R4).

C5 also commented on the government's role and responsibility in providing storage for Ontario's archaeological collections:

Ultimately, I think that... because archaeology is so closely tied with government... and, you know, the Ontario Heritage Act, ...they're administering licenses... You need to report to them. I don't see it... as much of a stretch... [that] they get to hang onto the collection. They are the central, the hub, of all collections and make it accessible to the people of Ontario (C5).

Without requirements for implementing long-term curation plans licensed archaeologists are left to create their own largely ungoverned methods of storage, scramble to find public institutions, and allocate funds towards making transfers. Evidently, that is not enough to ensure the safety of collections. Some individual consultants and larger firms do not allocate funds for transferring collections, rather than opting to keep collections mostly inaccessible and unresearched in their own personal storage. Individual licensees have even resorted to having instructions in their wills on how their estate will transfer collections after they pass away. Effective policy requires a “legitimate authority” in order to “enable stable and predictable approaches to particular goals” (Waterton and Watson, 2015, 427). The Ministry is the legitimate authority in Ontario archaeological collections management, and they have a responsibility to provide direction and basic care to collections in the province.

Chapter Six

6 Possible Solutions and Conclusions

After consulting with multiple stakeholders and reviewing scholarly research on Ontario collections management, I would like to propose some ideas to consider, moving forward, in dealing with the curation crisis. Many potential solutions have already been discussed with regard to what participants in this study expect from the Ministry in terms of changes in policy; policy changes are clearly necessary. I will discuss three other avenues for potential solutions that I believe should be explored to help determine policies and establish responsibility for archaeological collections in Ontario: considering policies and methodologies currently in use in other Canadian provinces, exploring the possibility of deaccessioning artifacts, and increasing communication among stakeholders.

6.1 Provincial Comparisons

In Canada, each provincial and territorial jurisdiction is responsible for archaeological collections management. While the Federal government currently does not have national archaeological legislation, each province/territory implements their own specific heritage legislation consisting of policies and bureaucracies (Dent, 2017, 137).

Archaeological legislation developed similarly across Canadian provinces. Key developments in Canadian archaeology were influenced by the establishment of the Geological Survey of Canada in the nineteenth century (Dent, 2016, 16). Some of the first heritage regulations began in Canada during the Victorian era, including the Indian Graves Ordinances in the Colony of British Columbia (Dent, 2016, 16). In Ontario, professional archaeology began to

form with the development of the Canadian Institute in the 1850s and from the work of some of its members, including David Boyle. Boyle began to curate archaeological collections at the Canadian Institute's archaeological museum and eventually the Ontario Provincial Museum. During the late 19th and early 20th centuries, Boyle also compiled Ontario's annual Archaeological Report which included information on archaeological projects, collections, and practice in the province. Working with non-professional archaeologists, Boyle established the foundation for avocational archaeology in Ontario. Alberta, Saskatchewan, and Manitoba have comparable origins in archaeology, stemming from the work of early geologists that led to some of the first excavations, such as those conducted on Manitoba mound sites (Dent, 2016, 16). Early Canadian archaeological institutions followed European institutions in codifying, curating, and institutionalizing the past (Dent, 2016, 17).

Moving forward to the second half of the twentieth century, as noted, CRM archaeology in Ontario was largely influenced by the rapid pace of development (Ferris, 2002, 60-62; Karrow, 2017, 8; Birch, 2006, 8; Uchiyama, 2015; 1). Archaeology in other provinces, including British Columbia and Alberta, was also affected by increasing development (Dent, 2016, 17-18). Advisory boards consisting of historians, architects and archaeologists emerged in response to protect heritage sites and buildings, which in turn had an impact on the formation of heritage legislation in each province (Dent, 2016, 18). The development of heritage legislation in Ontario and the policies governing artifact curation were discussed in Chapter 1.

Some participants in this study commented that Ontario has a reputation for poor collections management, especially in consultant archaeology. C2 stated that "Ontario is the only place I've ever worked where archaeologists are required to... curate the collections they find" (C2). Multiple participants noted that Alberta and the eastern provinces have quite commendable

collections management policies, thus for comparison I focused on some of the current archaeological legislation in these provinces.

The eastern provinces, including Nova Scotia, Newfoundland, and New Brunswick, all have policies that predetermine the institutions to which archaeologists must transfer their artifacts (Winter, 1996, 125). For example, in Nova Scotia under the Special Places Protection Act R.S., c.438, s.1, all objects of heritage value recovered during excavation under a heritage research permit must be delivered by the permit holder to the Nova Scotia Museum, or to another public institution the Minister may designate. Once that transfer is complete, the responsibility and ownership for those collections becomes the province's (Nova Scotia, 1989). Depositing collections in Indigenous institutions is possible through a formal loan agreement with the Nova Scotia Museum (Dent, 2016, 56). If this was the legislation in Ontario, this would mean all licenced archaeologists would be required to deposit collections either in one central repository, or in a number of repositories as designated by the Minister. Although Ontario may be too large to have one central repository, this could be an effective system if consultants were required to transfer collections to public institutions, especially if a number of repositories were designated. What is notable about Nova Scotia's legislation is that it clearly states who is responsible for collections before and after the transfer of artifacts. Authority for heritage management is mostly the responsibility of the Nova Scotia provincial government, including the responsibility for Indigenous engagement and consultation (Dent, 2016, 54-55). Before transfer, the licensed archaeologists are responsible, and after transfer, it is the province. Ontario's Heritage Act (and its regulations) fail to ensure that artifact collections end up in public institutions by allowing licensees to delay the transfer of collections indefinitely, resulting in many collections remaining

in private storage. In Nova Scotia the legislation is much more effective, ensuring that collections are deposited in public institutions.

Comparing a larger province with Ontario, some participants felt that Alberta has a relatively good reputation for collections management in CRM archaeology. R4 compared Alberta's website for archaeology to the Ontario Ministry's website:

Like the Ministry site, where if somebody finds something there's no way you can find what to do with it on the Ontario Ministry site, right? ... I find that the whole site is very sort of, uh, it's not friendly... But if you look at say the Alberta site is like, oh, you find... a lithic, this is what you should do, and they have a direct connection like they have a direct email... How many times do you go on that Ministry site in Ontario, and you keep getting looped around to the Ontario Heritage Act (R4)?

Alberta's website for provincial archaeology does appear to be more user friendly and does provide more resources and education for the public regarding what to do with archaeological finds. Through Alberta's website, I was easily able to find their Artifact Submission Guidelines for consultant archaeologists. This document has very detailed guidelines on what to do with very specific artifacts. For example, it contains a section regarding how to collect soil samples and it specifically lists options for which types of bags to use and not use. It also provides examples of when it is not appropriate to collect soil samples (ACT, 2018, 9). Guidelines such as this can be immensely useful for limiting the size of collections and for providing higher standards of collections methodology. Like Nova Scotia, archaeological consultants are required to transfer all collections they generate to the Royal Alberta Museum for long-term disposition and artifacts are considered property of the Crown (ACT, 2018, 1; Dent, 2016, 83).

It is important to note that facilities in other provinces are likely also affected by aspects of the curation crisis, especially a lack of storage space, however, based on the provisions implemented, they appear to recognize that consultant storage is not an option for long-term

curation. With collections required to be deposited in approved institutions, the risk of inaccessibility and loss of collections is minimized. Many participants suggested that it would be ideal to have regional repositories in Ontario where consultants could eventually deposit accumulated collections, and so that collections are not solely in southern Ontario facilities.

Participant C1 suggested:

[they could] ... have [an]... artifact repository set up in Thunder Bay, Timmins and Sudbury in the North. And then in London, Toronto and Ottawa let's say in the South. Then, sort of, from those catchment areas the artifacts could be transferred there ... they would allow for long-term curatorship and control over the collections (C1).

M1 and M2 agreed that it would be ideal to have regional repositories, but M2 noted “[That]... would be great, [but the] province hasn't committed to that” (M2). Other provinces have made commitments to the long-term curation of archaeological collections. They achieved this through providing dedicated long-term facilities and clear definitions of responsibility between the licensee and the province, so each knew what they were required to provide.

6.2 Deaccessioning

Originally, I did not plan on examining the idea of deaccessioning archaeological material. However, the topic emerged in the first few interviews I conducted, and I decided to investigate and ask later participants more about deaccessioning. The definition this paper will use for deaccessioning is “the formal removal of an object or collection from the holdings of an institution or other owners, such as a repository or state agency” (Domeishel and Waggle, 2020, 420; Collections Trust, 2017; Vecco & Piazzai, 2015, 222). This does not always imply that artifacts or collections are simply thrown away, though that may occur if an object is damaged beyond repair or has no further use (Collections Trust, 2017). Deaccessioning methods or situations may include loaning, transferring, exchanging, returning, selling, involuntarily losing,

or permanently destroying an object once it has decidedly been removed from an institution (Vecco & Piazzai, 2015, 222; Collections Trust, 2017). In the United States, the Native American Graves Protection and Repatriation Act (NAGPRA) uses deaccessioning to repatriate human remains and associated artifacts to their associated Indigenous communities (Domeishel and Waggle, 2020, 421). Thus, reasons for deaccessioning can extend to repatriation for human remains and sacred objects, transferring objects to another institution, and using objects for teaching collections (Collections Trust, 2017; Domeishel and Waggle, 2020, 421; Vecco & Piazzai, 2015, 222).

Upon further review and conversations with participants, I think that deaccessioning should be considered as a method in Ontario archaeological collections management. Collections in Ontario grow to become quite large as a result of the near complete collection of archaeological materials (both artifacts and ecofacts) removed from sites during fieldwork. This practice limits space, resources, and time spent on collections that otherwise might be used more effectively. Deaccessioning, in specific circumstances, may be a way to assist in reducing the size of collections and alleviating some of the responsibility for curating large collections.

Many museums in the province already have adopted deaccession policies, again a demonstration of the difference between archaeological and museum studies. Museum curator participants in this study discussed how their museums used to accept great amounts of material in the past. However, this quickly filled storage spaces and staff began establishing accession policies to limit how much material they would accept (R1, R3, R4). This also included the establishment of deaccession policies to amend for how many items were accepted in the past and to make room for new materials acquired through accession policies. Items that a museum may deaccession are those that are repetitive or redundant, irrelevant to their museum's purpose,

or not from within their local geographic area (R1). R1 described an example of what their museum may deaccession:

...If I had 15 razors in the collection, I don't need 15 razors that look the same. But if only five of them, we know who they actually were used by, and three of them were made in here in county, those are the ones we're going to keep versus the rest of them that don't tell us anything and don't do anything to further research into the history of razors or anything (R1).

R1 also described their museum's steps for determining how to deaccession material. The first was that an object could be included in their educational collection where individuals could touch it and educators could present it. Another step is reaching out to other museums through the Canadian museum community to see if the object is more applicable to the mission of another museum. If all other options are exhausted, the museum may sell objects privately in auction and the proceeds gained are required to go back to maintaining the collections (although this would not be a solution for archaeological objects) (R1). The Canadian Museum Association (CMA) also provides a Deaccessioning Guidelines checklist of what to consider before deaccessioning items (see Figure 9). It could be possible to employ a similar checklist with archaeological collections, but there is still debate about whether deaccessioning artifacts is ethical in archaeology. Many museum collections are different than archaeological collections, and deaccessioning has not been embraced in the discipline of archaeology. Participants among all groups had varying opinions about deaccessioning archaeological material:

...there has been ... 'deaccessioning of materials,' reputedly because of limited space for artifact storage curation. Which I don't really buy, but you know, stuff has been deaccession[ed] to the point that it's unlikely to ever be able to be recovered (M2).

CANADIAN MUSEUMS ASSOCIATION **Deaccessioning Guidelines**

Checklist for deaccessioning objects

Initial steps	Making the Critical Decision to Deaccession	Key Considerations	What to do now the decision has been made
<ul style="list-style-type: none"> ✓ Consider undertaking a full review of the collection ✓ Develop a project plan and allocate staff resources to manage the process ✓ Create an assessment framework to assist in evaluating objects within the collection and their suitability for disposal ✓ Secure your institution's governing body's agreement to the potential deaccessioning of the object(s) 	<ul style="list-style-type: none"> ✓ Make decisions to dispose as part of an overall collections management strategy/policy within your institution ✓ Specify the desired outcome ✓ Articulate the curatorial reasons for deaccessioning an object(s) ✓ Seek independent specialist advice, if necessary ✓ Consider the views of all stakeholders ✓ Develop a communications strategy ✓ Ensure the museum is legally able to deaccession the object(s) ✓ Recommend a method of disposal 	<ul style="list-style-type: none"> ✓ What is the desired end result? ✓ If successful, how will the method of disposal help to achieve the desired outcome? ✓ What are the benefits of the course of action selected? ✓ What is the potential for increased use of the item through the proposed course of action? (In the case of object(s) being recycled or destroyed, there maybe none) ✓ Is the proposed recipient able to provide adequate care and opportunities for access? ✓ What might the public reaction be? ✓ What if any are the potential risks? 	<ul style="list-style-type: none"> ✓ Identify potential appropriate institutional recipients and contact directly ✓ Publicize the availability of the object(s) through the CMA, other specialist publications and websites. ✓ Inform the donor, if applicable ✓ If a new location can be found, agree terms and conditions of transfer (or sale) ✓ Ensure complete transparency and communicate the disposal to the public ✓ Ensure transfer of legal title to the recipient ✓ Document the process.

What to do if the attempt to deaccession an item is unsuccessful

- Reconsider the institutions' decision to deaccession and object
- Consider possible alternative uses of the object(s) with the institution
- Consider whether the desired outcome could be achieved through another method of disposal

Figure 9: CMA's guidelines for deaccessioning (CMA, 2015).

Looking back at Lipe's Conservation Model, he emphasizes that artifacts must be collected and documented thoroughly for future research, as the context of an artifact is destroyed once items are removed from their locations *in situ* (Lipe, 1974, 215). With the archaeological context and site destroyed, the collection generated is all that remains. Deaccessioning the last remnants of a destroyed site causes concern over the loss of information and being unable to use those collections for educational purposes that may contribute to the archaeological narrative (Domeishel and Waggle, 2020, 421). This concern appears to have largely dissuaded some professionals from introducing deaccessioning to consultant archaeology.

Deaccessioning artifacts causes an ethical dilemma because of the loss of potential collections-based research, especially with the advancements of technology (Domeishel and Waggle, 2020, 422). Consultants may also develop an attachment to collections after spending extensive time, funds, and effort retrieving them, and deaccessioning collections without recoverability can be difficult.

If you're gonna deaccession it, then maybe they should be... made into classroom kits and used for educational purposes? I don't know. Um, also, do you really want a bunch of grubby little hands wrecking it? ... I don't know about deaccessioning. I haven't really thought about it. Like, oh my God, getting rid of it? Spent all that time to dig it up (C2).

This attachment to collections may even make transfers to other institutions, such as Sustainable Archaeology, more difficult as well.

One academic participant had mixed opinions of deaccessioning objects to the point of their destruction or discard because they did not think it was necessary quite yet; rather they suggested that effort should go into transferring collections to a long-term facility first before deaccessioning certain artifacts or collections:

Like, I don't think we're to that point yet... you're saying that certain consultants, you know, \$200 a box... That's a small amount of money relative to \$1,000,000 excavation project... (A3).

Losing information and exploring other alternatives to deaccessioning are all important factors to consider and are good reasons not to deaccession certain collections. Deaccessioning should not be conducted if there is a known loss of information (Domeishel and Waggle, 2020, 422). Many parameters would have to be established for deaccessioning archaeological material.

However, with certain parameters in place, deaccessioning can be a useful tool for collections management. If an object were to be deaccessioned, the process should be thoroughly documented and all paperwork related to the object should be kept (Domeishel and Waggle,

2020, 422). Similar to museum deaccession parameters, criteria for deaccessioning could include common items that reach a point of redundancy, items that have been determined to lack significance or analytical value, items that have deteriorated beyond recovery, or items that raise ethical issues such as ethnographic collections that may be returned to descendant communities. (Domeishel and Waggle, 2020, 423; Gerrard, 2013, 4).

Some participants were open to introducing a deaccession method for archaeology collections. C4 discussed deaccessioning at length regarding potential benefits, but also spoke of difficulties in determining what should and should not be deaccessioned.

...When there's not enough space, discussions around ... what should be kept, maybe what doesn't need to be kept, maybe what we shouldn't necessarily even be collecting in the field, like maybe more sampling for example. ... Questions like that are always so hard to get a consensus on 'cause everyone has a difference of opinion, so it seems to always come back to just collect everything, keep everything. Find a new building (C4).

Although long-term transfers to well-equipped facilities will assist in the longevity and research value of collections, if the collection consists of artifacts that offer little analytical value, essentially the storage issue spreads to a different institution rather than finding a solution (Uchiyama, 2015, 5). Like A3, C4 also used rusty nails as an example of which items could be deaccessioned:

... we're not gonna conserve and preserve ... every rusty nail that we've ever found, and if it's already been cataloged (pause), I guess there's possibly an argument that maybe somebody else might be able to do something better with it or more with it. But the reality is if someone is going to come back and do that in the future, it's gonna all be dust by then anyway (C4).

M3 also made a similar comment regarding on the realistic possibilities of coming back to certain collections in the future:

Boxes are getting lost. Things are getting moldy and falling apart, you know, and stuff is getting into rougher and rougher shape. You know, is that better than just pitching it or

donating it or? Yeah, it seems bananas that nobody wants to go there. So, I think, I mean my feeling would be First Nations communities (M3).

I asked First Nation participants about deaccessioning and three out of four participants were not familiar with the process, but all were interested:

... The position of most First Nations that are, you know, involved somewhat in archaeology is the perspective that if the material is housed within Mother Earth, it's safe and it's protected. So, reburying and putting back items where they were is, you know, is supported. But then we run into the protection, how do we protect, you know, if something has been reburied (D3).

M1 discussed an example of a collection that was no longer of interest that was placed in a shipping container, to protect against looters, and buried on site underneath planted trees and near a playground where a subdivision was built (M1). This may not be appealing to all First Nations or developers; however, it is a demonstration that creative deaccessioning is possible in CRM. I discussed with D3 how museums in Canada have deaccession policies, which D3 was unaware of as well, and they asked if part of these deaccession policies was to deaccession materials to First Nations. Although the CMA does not have a statement about explicitly consulting First Nations, they do state that relevant stakeholders with an interest in the collection should be informed during a deaccession process (CMA, 2015). Perhaps deaccessioning is not as widely known to First Nations, at least in Ontario, because most museums in the province are more historically focused and do not have extensive Indigenous collections. However, for archaeologists who have quite extensive Indigenous collections, deaccessioning could be a potential mechanism for repatriating artifacts to Indigenous communities. "I very much would, um, like to make sure that artifacts that are under my care actually become accessible to either, you know, researchers, the public, First Nations communities, Indigenous communities. ... that's something that I personally would very much like to do" (C5). Also, consider what some of these collections are:

... what constitutes these collections? In other words, 90% of this stuff is debitage, maybe some potsherds... and fire cracked rock. And you know, if they're still in paper bags, those are probably, you know, degenerating as we speak along with the information written on them (M2).

If some collections are unwanted by the archaeologist, offer no further analytical value, and will not have further research conducted on them, perhaps it is best to consider the possibility of using deaccessioning methods, such as deaccessioning those collections to associated stakeholders like First Nations. The documentation and photographs could still be retained to keep a record of the site, and the deaccession process itself would also require thorough documentation, but after that is complete, should these collections be kept on a shelf for decades? As noted, some researchers may be wary of this approach because of the potential that new methodologies and technologies may come out that will reveal new data from these artifacts. However, will these techniques be applied to every single piece of debitage, and what is the likelihood of these fragmentary collections becoming the subject of further research? Will these collections survive long enough to be used for future research?

Richard Gerrard notes that, again, this view of being responsible for maintaining collections “in perpetuity” requires extensive resources, staff, time, and money. Instead, Gerrard argues that collections should be treated as an “organic entity.” This approach may allow artifacts with more research potential to enter collections management, removal of objects that do not meet an educational or institutional mandate and may more efficiently direct resources towards remaining collections (Gerrard, 2013, 1). As one participant noted:

People I think...even archaeologists who loath to keep them, most would be just appalled at [deaccessioning]. But then, but the crazy part of that is nobody takes it to the logical conclusion, okay let's say your company's around for X number of decades. Where the hell do you think this stuff is going to go (M3)?

If certain collections are likely not going to be researched, what utility do they truly have to contribute to the archaeological narrative. Also, there is another narrative to consider, and that is decolonizing the discipline of archaeology and contributing to reconciliation with Indigenous communities. The idea of deaccessioning collections to Indigenous communities so that they can treat them as they wish would be a step in that direction. The Truth and Reconciliation: Calls to Action (2015) numbers 67 and 70 address adhering to the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP) (United Nations, 2007) which involves the reconciliation and repatriation of human remains and culturally significant objects to Indigenous communities in Article 12 (Truth and Reconciliation Commission of Canada, 2015, 8; United Nations, 2007, 12; Collison, et al, 2019, 54). However, the repatriation and deaccession of objects that are considered not as culturally significant, such as potsherd fragments or fire-cracked rock, is currently not an accepted management tool for archaeologists (Childs and Benden, 2007, 20; Domeischel and Waggle, 2020, 421-422).

6.3 Connections, Communication and Collaborations

The lack of communication among all five groups of participants was a recurring element throughout this study. Museum curators, consultant archaeologists, descendant community representatives, the Ministry, and academic and avocational archaeologists are not working together effectively in Ontario collections management. They are all stakeholders in collections management that, I believe, should be working more closely together for the benefit of utilizing collections to their fullest potential. “I mean... it's basically it's just a matter of communication, interaction, trust” (M2). A2 also commented on the challenges with conversations between stakeholders to the point of frustration:

...like the idea is to revise the notion of engagement and really collaborate between all these multiple stakeholders. But really, how? Like what's next? ... really thinking about this stuff, but also actually putting it in practice, right? All these diverse perspectives on... how to manage the archaeological material, especially in Ontario, ... I really don't know. It's a difficult conversation for sure (A2).

To move forward with engagement, consultation, and collections management, stakeholders need to be communicating with each other to formulate and implement future care and research for collections. One participant did mention being part a collections management group consisting of individuals with different backgrounds in collections management, and they emphasized it has been invaluable to their experience. Ideally, it would be beneficial to have more stakeholders in Ontario collections management work together to develop ideas, lessons, and practices.

6.4 Concluding Statement

Determining the responsibility for archaeological collections management involves ethical challenges, disciplinary paradigm shifts, formulating effective strategies and allocation of funds. These are not new challenges to anthropology and archaeology. I agree with participants that responsibility for archaeological collections in Ontario should be delegated to proper storage facilities. Such facilities, whether under Indigenous control or operated in collaboration with Indigenous communities, must be accessible to academics, First Nations and other researchers. Although the current legislation states that the Minister of Heritage, Sport, Tourism, and Culture Industries may direct collections to public institutions, this is typically only conducted by the licensee's request. Therefore, I think it is more logical for consultant archaeologists to be held responsible for transferring collections to facilities such as the Sustainable Archaeology repositories, as is done in other provinces of Canada. Consultants should not be the long-term curators for collections as this situation severely cripples the accessibility and utility of these

collections and does not benefit the historical and archaeological narrative.

Although, according to participants, the future of the Ministry's role in Ontario collections management seems to be ambiguous, I believe they must uphold their responsibility to hold collections for the people of Ontario. As the two Sustainable Archaeology repositories fill up, the Ministry's role should be ensuring that similar facilities are provided across the province after consultant archaeologists have demonstrated they will be utilized instead of private storage. The role of the Ministry should also include providing standards and guidelines for collections management, like those seen in other jurisdictions (i.e., Alberta), and enforcing those standards among licensed archaeologists. With enforcement of standards, consultants will have to allocate funds towards collections management and either create facilities with high curations standards or, more ideally, pay to transfer collections to accredited repositories.

I think it would be best to consider requiring licensees to list where they will eventually transfer collections to in the long-term on Project Information Forms at later stages of site assessments in order to provide some form of long-term disposition plan. Once archaeological consultants demonstrate to the province that facilities such as Sustainable Archaeology are essential and will be used, there will be an argument that more funds should be invested into the development of regional facilities across the province, including Indigenous facilities. I believe these are the initial first steps in creating a more effective collections management system. Discussions around deaccessioning should also occur, but deaccessioning should not be implemented until it has been carefully thought out and fully regulated by the Ministry.

I would like to conclude with one final quote that I think encapsulates what is often forgotten in Ontario collections management: "... that's not the end, you know, a license report isn't the end of the dig, right? That's not the final product. That's kind of the beginning" (A3).

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Appendix A

Archaeological Collections Deposit Fact Sheet **How to deposit collections under your licence in a public institution** **A guide for licensed archaeologists**

This fact sheet provides an overview of the process archaeologists are required to follow when depositing an archaeological artifact or collection of artifacts from Ontario in a public institution. It also answers frequently asked questions about deposits (sometimes referred to as ‘transfers’) and provides useful tips and contact information.

Please email archaeology@ontario.ca for information on topics not covered in this fact sheet, including:

- How to deposit a collection on behalf of another archaeologist (e.g., an archaeologist who is deceased or a former employee who cannot be reached).
- How to loan a collection to an individual or organization.
- How a public institution can deposit a collection in their care with another institution.

What is an archaeological collection?

An **archaeological collection** (“collection”) is made up of all artifacts and other materials originating or collected from an archaeological site, as well as the records of archaeological fieldwork that document the site. A collection may include one or more of the following classes of archaeological resources: artifacts, soil samples, floral remains, faunal remains and records that document the site such as field notes, reports, catalogues, digital files, maps, photographs and drawings.

The conservation of Ontario’s archaeological collections is important so that current and future generations can learn about and understand the past. When archaeological collections are deposited in public institutions it helps to ensure that they are preserved through secure storage and long-term care. It also allows them to be accessed by the public and descendent communities (such as Indigenous communities) for research, education and cultural purposes.

What are my responsibilities for collections made under my licence?

One of the conditions of an archaeological licence is:

The licensee shall hold in safekeeping all artifacts and records of archaeological fieldwork carried out under this licence except where those artifacts and records are transferred by the licensee to Her Majesty the Queen in right of Ontario or the licensee is directed to deposit them in a public institution in accordance with subsection 66(1) of the Ontario Heritage Act.

Section 66(1) of the *Ontario Heritage Act* provides the Minister of Tourism, Culture and Sport (or delegate) with the power to direct artifacts to be deposited in a public institution to be held in trust for the people of Ontario. This means that the archaeologist, as a licensee, is responsible for collections made under his or her licence unless he or she deposits them in a public institution or with the province. This can be done either through the deposit process described in this fact sheet or through specific

direction from the Minister of Tourism, Culture and Sport (or delegate). Collections acquired under one licence cannot be transferred to another licensee nor can they be deposited with private businesses or individuals.

What is a collection deposit?

A collection deposit is the act of depositing a collection held by a licensed archaeologist (including all associated field notes and reports) to a public institution such as a museum. Depositing a collection helps to ensure its long-term care and conservation, and also provides the public, researchers and descendent communities (Indigenous or non-Indigenous) with access to the collection. Making collection deposits a routine part of your archaeological process also ensures the long-term care of a collection independent of life events that the licensee may face, such as leaving a company, company closure, retirement, sickness or death.

Who is responsible for a collection once it is deposited in a public institution?

A ministry-approved deposit of an archaeological collection in a public institution permanently relieves the licensee of his/her obligations (as defined by the licence [Terms and Conditions](#)) to retain the collection in safekeeping. The public institution holds the collection in trust for the people of Ontario and becomes fully responsible for the collection in perpetuity (unless the Minister subsequently directs the public institution to deposit the collection with the province or another public institution).

How can I deposit a collection with a public institution?

In order to deposit an archaeological collection with a public institution, the licensee must complete the following five steps. If it is possible that there is human bone, burial items or sacred items within the collection, please contact the ministry at archaeology@ontario.ca before initiating a deposit.

1. Ensure that the related reports have been entered into the *Ontario Public Register of Archaeological Reports* and the associated site forms entered into the *Ontario Archaeological Sites Database*.
2. Identify a public institution that is prepared and willing to accept the collection and negotiate a Deposit Agreement with that institution.
3. Complete and submit the *Licensee Request for Minister's Direction to Deposit an Archaeological Collection* ("deposit form").
4. Submit a site correction or site update in Ontario's Past Portal (PastPort) for ministry review. This will include the new proposed location of the archaeological collection.
5. Subject to Minister's direction, deposit the collection with the public institution in accordance with the terms of the Deposit Agreement.

In order to deposit a collection with a public institution, the licensee must submit the signed deposit form to the ministry. Email the deposit form to archaeology@ontario.ca. We will respond to each request for Minister's direction within 10 business days. The licensee must obtain written direction from the ministry before physically depositing the collection.

The deposit form is available in PastPort's Resource Centre and upon request by emailing archaeology@ontario.ca. Complete the form and ensure that it is signed by both the licensee and a signing authority for the public institution. The completed form must be accompanied by the following attachments:

- A catalogue that corresponds to the packed collection (e.g., list of artifacts by box numbers).
- A list of associated records that document the site (e.g., field notes, reports, catalogues, digital files, maps, photographs and drawings).
- Any records of Indigenous engagement related to the artifact deposit.
- A copy of the Deposit Agreement between the licensee and the public institution, signed by both parties.

If the attachments are too large to email please contact archaeology@ontario.ca for further advice.

What is a public institution?

Public institutions are non-profit, publicly funded and publicly accessible institutions with dedicated staff and policies that follow procedures and practices to ensure the preservation and management of archaeological collections.

Examples of public institutions that hold archaeological collections may include:

- Museums
- Archaeological repositories
- Indigenous cultural centres
- Ministries of the province
- Academic institutions

The ministry uses the following seven criteria to determine if the proposed institution is a “public institution”

1. The institution is located in Ontario (certain exceptions may be permitted).
2. The institution is willing to enter into a Deposit Agreement and assume full responsibility for the archaeological collection(s).
3. The institution is non-profit, and partially or entirely publicly funded.
4. The institution and collections are accessible to the public, researchers and descendent communities.
5. The institution has facilities, staff and policies dedicated to collections conservation and management, including the ethical use and exhibition of collections.
6. The institution has policies and physical facilities that will ensure the security of collections, including controlled access.
7. The institution is able to preserve and manage archaeological collections for the people of Ontario in perpetuity or until the Minister directs through written request that they be deposited with the province or another public institution.

Under the *Ontario Heritage Act*, the Minister of Tourism, Culture and Sport (or delegate), has the power to set criteria that determine the appropriateness of a public institution to accept archaeological

collections, as well as the discretion to make exceptions with regard to these criteria. In order to request an exception, email archaeology@ontario.ca.

What is a Deposit Agreement?

The *Licensee Request for Minister's Direction to Deposit an Archaeological Collection* form ("deposit form") must be agreed to and signed by both the licensee, and a signing authority for the public institution. As part of this process the licensee must enter into a Deposit Agreement with the public institution that transfers the responsibility for a collection from a licensee to a public institution.

The Deposit Agreement determines other terms of the deposit (e.g., a copyright agreement to address any intellectual property issues) and is conditional on the receipt of the Minister's direction and must require the public institution to:

- hold the collection in trust for the people of Ontario;
- obtain a Minister's direction before it can sell, dispose of or transfer the collection, in whole or in part, to another institution or person;
- make the collection accessible to the researchers, descendent communities, and the public for research, cultural, educational, or other suitable purposes;
- promptly remove and/or deliver any part of the collection on a request to do so by the Province; and
- have and follow policies for the protection, preservation and exhibition of the collection.

The Deposit Agreement must also address: de-accessioning and intellectual property rights to those parts of the collection subject to those rights.

TIP

A copyright agreement allows a public institution to use records of archaeological fieldwork (e.g., photographs, drawings, information from reports) for purposes such as exhibits and research. Appropriate acknowledgement of the archaeologist/organization/archaeological consulting company can be a condition of the agreement.

How do I find an appropriate public institution?

The Ontario Museum Association has a website tool (<http://www.museumsontario.ca/>) to help locate museums through various search parameters. Indigenous communities also often have cultural centres that hold archaeological collections, as listed below. It is the licensee's responsibility to ensure that the institution meets the criteria set out above and is currently accepting archaeological collections. If the licensee is not sure or if there may be extenuating circumstances please contact archaeology@ontario.ca.

Important: Whether or not a public institution will accept a collection depends on:

- Institutional capacity - some institutions face capacity challenges that may prevent them from accepting new collections or limit the types of artifacts that they can accept.
- The nature of the collection - a public institution's policies will often require collections to be relevant to its mandate. As examples, community museums tend to accept collections from within a defined geographic area, while Indigenous cultural centres may focus on collections from within a traditional territory.

Below is a list of Indigenous cultural or community centres that hold archaeological collections. The list is not exhaustive and there may be other communities accepting archaeological collections. Contact archaeology@ontario.ca for more information.

- Ojibwe Cultural Foundation, Anishinaabe People of the Mnidoo Mnising and surrounding areas
- Woodland Cultural Centre, Six Nations
- Deyohahá:ge: The Indigenous Knowledge Centre, Six Nations
- Curve Lake Cultural Centre, Curve Lake First Nation
- Walpole Island Heritage Centre, Walpole Island First Nation
- Kay-Nah-Chi-Wah-Nung Historical Centre, Rainey River First Nation
- Omàmiwinini Pimàdjowin Algonquin Way Cultural Centre, Algonquins of Pikwàkanagàn First Nation

Engaging Indigenous communities

Indigenous communities have an interest in the conservation of collections from archaeological sites in Ontario that are of Indigenous origin. Such interests may include: ensuring that these collections are returned to descendent communities or protected and accessible to them at an appropriate public institution. When considering the deposit of a collection from a site of Indigenous origin, archaeologists should engage Indigenous communities in the deposit process. In particular, consulting archaeologists should discuss the future care and deposit of archaeological collections from sites they are working on when they engage Indigenous communities as required under the *Standards and Guidelines for Consultant Archaeologists*.

Indigenous engagement early in the deposit process can:

- Identify an appropriate Indigenous cultural centre to act as the recipient public institution.
- Add to the understanding of the collection thereby enriching the archaeological record.
- Help Indigenous communities develop relationships with museums and repositories so that they can work collaboratively on the management and interpretation of the collection.
- Help public institutions establish policies or agreements with Indigenous communities around access to collections.

Community engagement

Depending on the nature of the collection, local communities, religious institutions or relevant special interest organizations, such as an ethnic or cultural organization (e.g., Ontario Black History Society) may have an interest in a collection deposit. Community engagement may include engaging with one or more of these groups in the deposit process, including the selection of a public institution.

How do I prepare a collection for deposit?

Most public institutions will require that the licensee prepare, organize and/or re-house archaeological collections in a particular way before accepting a deposit. Some institutions also charge fees. When considering a public institution, contact them to find out if they have requirements for the preparation of collections prior to deposit and if they charge fees.

Important: De-accessioning or discarding parts of a collection (for example unstable or redundant artifacts) prior to or after a deposit is not permissible. Should a public institution require this, contact the ministry for advice by emailing archaeology@ontario.ca.

How do I update the location of the archaeological collection in PastPort?

You must update the location of the collection in PastPort. If the licensee has not yet submitted a *Site Update* for the related project, the new collection location can be included on that submission. If all site forms have previously been submitted, the location can be updated by submitting an *Archaeological Site Correction*. This enables the ministry and anyone with access to PastPort to find the collection and request access to it. The location of the collection must be updated before the ministry will approve the deposit.

All licensees can submit a site correction for any site. The *Archaeological Site Correction* form can be found in PastPort's 'Archaeological Site' module. The original location of the collection will be retained in PastPort for reference purposes. The site correction will have a status of "under review" until the ministry has approved the deposit.

Instructions regarding site updates and corrections can be found in the PastPort quick reference guides *How to Submit a Site Update* and *How to Submit a Site Correction* located in PastPort's Resource Centre.

How does the ministry process collection deposit requests?

Once the ministry receives the completed deposit form, all required attachments and the *Archaeological Site Correction* in PastPort, staff will review the proposed deposit in order to ensure that:

- the forms are complete and accurate.
- the related report has been entered into the *Ontario Public Register of Archaeological Reports*.
- the public institution meets the ministry's criteria.
- the deposit form has been signed by both the licensee and a signing authority for the public institution.

The ministry may also contact third parties, such as descendent communities, to determine if they have an interest or concern with the proposed deposit. The ministry may take interests or concerns into consideration when reviewing the deposit request and may require further information and discussion prior to providing direction.

Once the ministry is satisfied with the proposed deposit we will notify you and the recipient institution of the minister's direction to permanently deposit the collection with the intended recipient public institution. Once you have received the Minister's direction, you may deposit the collection.

Where can I go for more information?

If you have questions about the information in this fact sheet, email us at archaeology@ontario.ca.

Appendix B



Date: 13 October 2020

To: Dr. Peter Timmins

Project ID: 116205

Study Title: An investigation into the curation of archaeological collections in Cultural Resource Management in Ontario, Canada

Short Title: Ontario's Archaeological Collections Management

Application Type: NMREB Initial Application

Review Type: Delegated

Full Board Reporting Date: 06/Nov/2020

Date Approval Issued: 13/Oct/2020 13:53

REB Approval Expiry Date: 13/Oct/2021

Dear Dr. Peter Timmins

The Western University Non-Medical Research Ethics Board (NMREB) has reviewed and approved the WREM application form for the above mentioned study, as of the date noted above. NMREB approval for this study remains valid until the expiry date noted above, conditional to timely submission and acceptance of NMREB Continuing Ethics Review.

This research study is to be conducted by the investigator noted above. All other required institutional approvals must also be obtained prior to the conduct of the study.

Documents

Approved:

Document Name	Document Type	Document Date	Document Version
Vienna Mann Section 2.8 Research Plan	Protocol	17/Aug/2020	1
Ontario Archaeological Collections Management Section 2.5 Interview Guide	Interview Guide	18/Aug/2020	1
Ontario Archaeological Collections Management Section 2.10 Debriefing Form	Debriefing document	18/Aug/2020	1

Ontario Archaeological Collections Management Section 3.1.6f Email Script	Recruitment Materials	18/Aug/2020	1
Ontario Archaeological Collections Management Section 4.5 Letter of Information and Consent	Written Consent/Assent	06/Oct/2020	2
Ontario Archaeological Collections Management Section 3.1.5f Telephone Script	Recruitment Materials	09/Oct/2020	2

Documents

Acknowledged:

Document Name	Document Type	Document Date	Document Version
Ontario Archaeological Collections Management Section 2.7 Table 1 - Participant Range	Supplementary Tables/Figures	18/Aug/2020	1

No deviations from, or changes to the protocol should be initiated without prior written approval from the NMREB, except when necessary to eliminate immediate hazard(s) to study participants or when the change(s) involves only administrative or logistical aspects of the trial.

The Western University NMREB operates in compliance with the Tri-Council Policy Statement Ethical Conduct for Research Involving Humans (TCPS2), the Ontario Personal Health Information Protection Act (PHIPA, 2004), and the applicable laws and regulations of Ontario. Members of the NMREB who are named as Investigators in research studies do not participate in discussions related to, nor vote on such studies when they are presented to the REB. The NMREB is registered with the U.S. Department of Health & Human Services under the IRB registration number IRB 00000941.

Please do not hesitate to contact us if you have any questions.

Sincerely,

Katelyn Harris, Research Ethics Officer on behalf of Dr. Randal Graham, NMREB Chair

Note: This correspondence includes an electronic signature (validation and approval via an online system that is compliant with all regulations).

Appendix C



Date: 22 October 2021

To: Dr. Peter Timmins

Project ID: 116205

Study Title: An investigation into the curation of archaeological collections in Cultural Resource Management in Ontario, Canada

Application Type: Continuing Ethics Review (CER) Form

Review Type: Delegated

Date Approval Issued: 22/Oct/2021

REB Approval Expiry Date: 13/Oct/2022

Ethics Approval Lapse: October 14 - *
October 22, 2021*

Dear Dr. Peter Timmins,

The Western University Non-Medical Research Ethics Board has reviewed this application. This study, including all currently approved documents, has been re- approved until the expiry date noted above.

REB members involved in the research project do not participate in the review, discussion or decision.

The Western University NMREB operates in compliance with the Tri-Council Policy Statement Ethical Conduct for Research Involving Humans (TCPS2), the Ontario Personal Health Information Protection Act (PHIPA, 2004), and the applicable laws and regulations of Ontario. Members of the NMREB who are named as Investigators in research studies do not participate in discussions related to, nor vote on such studies when they are presented to the REB. The NMREB is registered with the U.S. Department of Health & Human Services under the IRB registration number IRB 00000941.

Please do not hesitate to contact us if you have any questions.

Sincerely,

The Office of Human Research Ethics

Note: This correspondence includes an electronic signature (validation and approval via an online system that is compliant with all regulations).

Appendix D

Inspections Fact Sheet

What to expect when MTCS inspects your fieldwork or facility. A guide for licensed archaeologists, business owners and employees

This fact sheet provides a general description of what to expect from and how to prepare for an inspection by the Ministry of Tourism, Culture and Sport. Knowing what to expect during and after an inspection of archaeological fieldwork, a laboratory, collection storage facility or business premises (facility) can help you understand the process and clarify expectations. This fact sheet also answers frequently asked questions about the inspection process and provides you with useful tips and contact information.

Who performs inspections under the Ontario Heritage Act?

Under the Ontario Heritage Act, an inspector is a government employee who is appointed by the deputy minister of the Ministry of Tourism, Culture and Sport. The inspector has the legal authority to enter a property or premises to conduct an inspection in Ontario. The inspector is committed to performing their duties with professionalism and conducting the inspection in an open and transparent manner. The inspector promotes respect for the law and ensures that inspections are conducted in a timely, consistent, impartial and courteous manner.

An inspector may be accompanied by one or more experts, such as other ministry employees, academic archaeologists, a First Nations or Métis representative or a professional archaeologist. For example, an inspector who is not a trained archaeologist may be accompanied by a licensed archaeologist.

What legislation is the inspector using?

Inspectors enforce Part VI of the Ontario Heritage Act, the terms and conditions of holding an archaeological licence, and the *Standards and Guidelines for Consultant Archaeologists* (2011) to protect, conserve and preserve archaeological sites in Ontario.

The archaeological fieldwork may be subject to other laws such as for health and safety (Occupational Health and Safety Act) or for human remains (Funeral, Burial and Cremation Services Act); however, the inspector does not review for compliance with these laws.

What can I expect from an inspection?

Generally, when inspecting a facility, an inspector will schedule the inspection in advance by consulting with you. However, in certain circumstances, it is necessary for an inspector to arrive unannounced.

When inspecting archaeological fieldwork currently in progress or completed within one year before the inspection, an inspector will often arrive unannounced.

Upon arriving on the property or facility, an inspector will identify herself or himself. The inspector will ask to speak to the licensed archaeologist or the field director. The inspector will produce a certificate of appointment and explain the purpose of the inspection and any areas that may be of specific concern.

When an inspection has been completed in the absence of the licensed archaeologist (e.g., the archaeological fieldwork was completed within the past year), the licensee will be notified of the results and details of the inspection.

While on the property or in the facility, the inspector will collect information to evaluate compliance and will make notes to record details of the inspection. The inspector may interview personnel; review records; tour the property, site or facility; collect samples; take photographs; or copy documents or conduct tests.

TIP

If you have any questions or something is not clear, ask the inspector for clarification at any time during the inspection. Also be sure to inform the inspector of your site safety procedures.

Why is my fieldwork or facility being inspected?

The ministry may inspect your fieldwork or facility for several reasons:

- to conduct a routine site inspection
- to evaluate compliance with legislative requirements and the conditions of your archaeological licence
- to address concerns identified through the report review process
- to respond to a complaint, or a referral from another government agency, or to follow up a previous inspection that found violations.

How should I prepare for the inspection?

1. Please notify your staff, personnel, workers, etc. that an inspection will be conducted and to be fully cooperative with the inspector.
2. Keep your fieldwork records organized and readily accessible. Ensure your records are detailed and document the decision-making process and the outcomes of the decisions. This will keep the inspection time to a minimum.

What will be looked at during the inspection?

Depending on the purpose of the inspection, the inspector will look at some or all of the following:

- ongoing field or laboratory work
- the methods applied to the assessment
- the strategy for the assessment

- drawings, field notes, maps, photographs □ artifacts, collected samples, or □ laboratory and storage facilities.

In addition to the property or facility tour and interview, the inspector has the authority to access and copy relevant records including:

- photographs and videos
- field notebooks and records
- electronic records
- maps
- previous assessment reports.

TIP

It is important to provide accurate answers and information to the inspector. If you do not know the answer, either obtain the answer from someone who can respond or tell the inspector when and how you will supply an answer.

What happens after the inspection?

After the inspector has concluded the inspection, the inspector will review the information gathered. Based on that review, the inspector may request a meeting with the archaeologist(s). This may range from a brief and informal discussion to a formal meeting.

The inspector will review observations and, if necessary, request clarification. The inspector may ask for more information and will let you know how to provide it.

The inspector will discuss with you his or her observations of any non-compliance and explain the next steps to be taken. It may take several days to complete a final compliance evaluation. In that case, the inspector will let you know when to expect a report.

What happens if non-compliance is identified?

If the archaeological fieldwork complies with ministry requirements, the inspector will take no action. However, every non-compliance situation identified will be promptly evaluated to determine whether it constitutes:

- a known or anticipated impact to archaeological sites (e.g., improper use of mechanical equipment); or
- a potential, uncertain hazard (e.g., use of an incorrect method or strategy leading to data loss).

In some situations, you could receive a verbal or written request to correct identified concerns within a certain time period. Such requests are typically used for minor issues and may result in a follow-up inspection. If the inspector believes you have failed to comply with the Ontario Heritage Act, a formal inspection report is required to be provided to the Minister of Tourism, Culture and Sport and to the licensee.

For instances where the compliance violations cannot be corrected, the inspector may recommend to the archaeology review officer that the report on the assessment or mitigation be deemed non-compliant and not entered into the Register.

TIP

Consider conducting a self-assessment of your facility and fieldwork guidelines to ensure that you are complying with the *Standards and Guidelines for Consultant Archaeologists*. This can help improve your compliance and identify opportunities that can reduce the costs of the archaeological work at the site.

Where do I go for more information?

For more information about the ministry's archaeology program, visit our website at: ontario.ca/archaeology The site contains more information about the *Terms and Conditions for Archaeological Licences* and the *Standards and Guidelines for Consultant Archaeologists*.

You may also contact the ministry's Archaeology Programs Unit for more information about inspections at archaeology@ontario.ca or by phone at 416-212-8886.

Curriculum Vitae

Name: Vienna Raven Mann

Post-secondary Education and Degrees: Wilfrid Laurier University
Waterloo, Ontario, Canada
2015-2019 B.A.

Related Work Experience

Teaching Assistant
The University of Western Ontario
2019-2021

Research Assistant
Wilfrid Laurier University
2019

Field Technician
CRM Group Ltd.
2016-2018 (on contract a few weeks each year)

Field Technician
Bluestone Inc.
2016