

It's not too late! If you haven't had a chance to tell Doug Ford what you think about Bill 23 — and the changes to the Ontario Heritage Act — you still have time.

What is happening with Bill 23?

Yes, the bill passed 3rd reading on Monday, 28 November and received Royal Assent on Tuesday, 29 November. But the Ministry of Citizenship and Multiculturalism (MCM), now responsible for heritage, has extended the comment period on the OHA-related changes to 9 December stating:

We have extended the deadline of this posting to enable your feedback to continue to be submitted so that it can help inform the implementation of this proposal as well as future initiatives.

Clearly MCM is interested in hearing more comments!

- Comments submitted on the Environmental Registry of Ontario (ERO) may assist MCM with the drafting of regulations and other implementation materials or “initiatives” not yet developed. For example, the proposed change in the eligibility “threshold” for designation — from one criterion of cultural heritage value to two — would require a regulation change. Or not, if the ministry was persuaded this was a bad idea!
- Also remember that the bill's changes to the OHA itself are *not yet law*. They still need to be proclaimed. While the government is targeting January 1, 2023 for this, there may be some flexibility with respect to proclamation of particular parts of the bill. Comments on the changes to Municipal Heritage Registers and listing, for example, may be taken into account in deciding when — and even whether — those provisions should become law. Or perhaps be held back to undergo further review and then be modified in future legislation!

If you have already submitted comments great, but still have other thoughts to share — don't hold back!

What do you want to say?

To help you, below are 9 suggested comments to generate some ideas, get your pen scratching or your fingers tapping.

Remember to put them in your own words to make the biggest impact.

1. The proposed changes threaten our heritage but won't lead to more truly affordable or attainable housing.

2. The change in the “threshold” for designation, requiring that two criteria be met rather than one, will make it almost impossible to protect humble buildings and places associated with the historic contributions of Black, Indigenous, Franco-Ontarians, multicultural and 2SLGBTQIA+ communities in Ontario.
3. The changes to the Ontario Heritage Act, supported by the Minister of Citizenship and Multiculturalism, will stymie recognition of cultural diversity in Ontario.
4. The changes to the Municipal Heritage Register and listing undermine the importance of local planning, limit the ability of local Municipal Heritage Committees, and place undue pressure on municipal staff and volunteers to protect local heritage properties.
5. Forcing municipalities to designate all listed properties within 2 years or drop them from the Register is draconian and totally unrealistic. It will result in tens of thousands of listed sites losing what little protection they have.
6. Property owners shouldn't be forced to choose between listing and designation to recognize the heritage significance of their property.
7. Changes to the Standards and Guidelines for the Conservation of Provincial Heritage Properties leave provincially owned landmarks such as Ontario Place vulnerable to the whims of politicians and developers.
8. The quickest way to create more housing is to re-use and adapt existing older buildings. Convert old schools to affordable apartments, for example, or homes for seniors. Fix and re-use our older neighbourhoods already serviced and connected by transit to offer affordable housing alternatives.
9. Conserving Ontario's heritage is of the utmost importance. Loss of heritage sites and our older buildings means loss of jobs in the renovation and tourism industries, and loss of our sense of place. Destroying older buildings releases embodied carbon and contributes to climate change.

As a refresher, the changes included in Bill 23 that impact the Ontario Heritage Act include changes to the Standards and Guidelines for the Conservation of Provincial Heritage Properties; Municipal Heritage Registers; the definition of cultural heritage value; and the process for amending and repealing Heritage Conservation Districts.

For more information on the changes, refer to ACO's submission to the ERO at the following link: https://aontario.ca/show_news.php?nid=84

How do you make your submission?

The proposed changes to the OHA and its regulations have been posted on the ERO here: <https://ero.ontario.ca/notice/019-6196>.

The deadline for comments has been extended to 9 December 2022. Submit comments or documents by clicking on the "Submit a Comment" button.