Mapping Collaboration: An Evaluation Framework to Assess Municipal Government Responses to PPS 2020

A Report for

Shared Path Consultation Initiative

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Acknowledgment

We want to acknowledge the opportunity to meet and work on this land. This land is the traditional territory of many nations including the Mississaugas of the Credit, the Anishnaabeg, the Chippewa, the Haudenosaunee and the Wendat peoples and is now home to many diverse First Nations, Inuit and Métis peoples. We also acknowledge that Toronto is covered by Treaty 13 with the Mississaugas of the Credit..

We are grateful for the opportunity to work on this project and would like to thank our client Shared Path Consultation Initiative for making us a part of it. We built our project on the research previously conducted by Morgan Peters and Dali Carmichael from Shared Path, who constantly guided us and provided valuable feedback. We would also like to thank our external advisors David Stinson and Dr. Heather Dorries for their insights.

Our research was enriched by insights from four Indigenous experts working in the realm of municipal-Indigenous relations : P. Leigh Whyte, President at PLW Planning & Environmental Consulting, Tom Cowie, Lands/Resources Consultation from Hiawatha First Nation, Colette Isaac, First Nation Administrator at Moose Deer Point First Nation and Dr. Julie Kapyrka, Lands Resources Consultation-Liaison from Curve Lake First Nation. We are indebted to them for sharing their knowledge and for guiding us.

Last but not least, we would also like to express our gratitude towards Michelle Berquist, our project supervisor, and Dr. Katharine Rankin for supporting us in this process.

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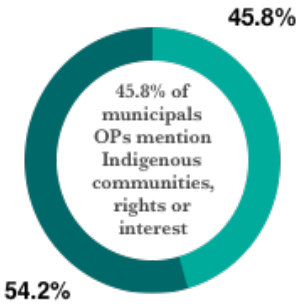
Executive Summary

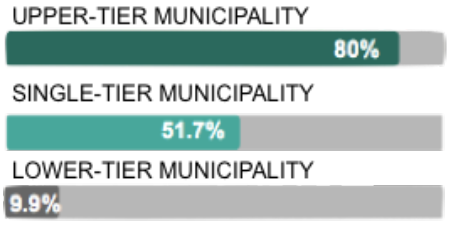
The 2020 Provincial Policy Statement ushered in a significant shift in the language used to define municipal obligations with regard to Indigenous communities, strengthening the directives for meaningful engagement with Indigenous communities and the integration of their rights and traditional knowledge into land use planning. While these changes stand to substantially redefine municipal-Indigenous relationships, they can only be realized if the implementation of PPS directives is consistent and holistic across the province.

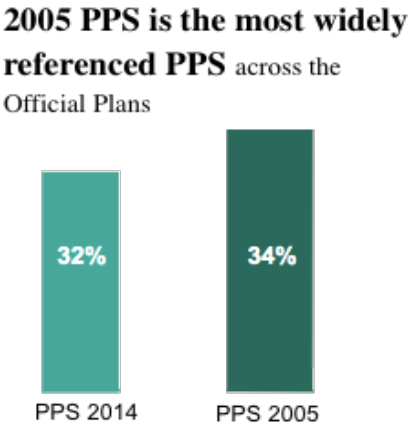
This report is the result of a collaborative research project undertaken by a team of University of Toronto graduate students under the guidance of the Shared Path Consultation Initiative. Focusing on municipal Official Plans - which are the primary documents through which PPS directives are implemented at the municipal level - the project had two specific intentions:

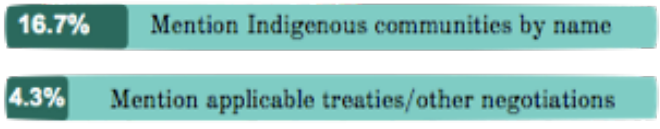
1.) To critically assess the current landscape of municipal-Indigenous relationships, based on Official Plan content
2.) To develop an evaluation framework through which municipal Official Plans could be assessed for consistency with the 2020 PPS directives on Indigenous rights, and which could function as a guiding reference document for implementation work at the municipal level

To critically assess the current landscape, a descriptive analysis of Official Plans from all 444 municipalities in Ontario was conducted. This analysis was based on 6 keywords, which have been previously used by our client in their research on Official Plans. The keywords were: "First Nations", "Treaty", "Indigenous", "Aboriginal", "Métis", and "Indian". These mentions were tagged according to 26 chosen indicators, accounting for different types of inclusions/content deemed significant. These include 'structural' mentions (e.g. mentions in sections dealing with heritage, infrastructure, the environment, etc.) and 'conceptual' mentions (e.g. those that refer to Indigenous rights, identify communities and treaties by name, make use of directive language when stating commitments, etc.) A selection of key results from this analysis is visualized below:









OPs most commonly reference Indigenous communities in sections focusing on **cultural heritage/archaeology and consultation (image from** https://thenounproject.com/)

Along with focusing on existing literature, the evaluation framework developed as a part of this report was drawn from insights gleaned from 4 Indigenous experts, each working in the field of municipal-Indigenous relationships in Ontario. **The framework is divided into three theoretical themes: Recognition, Reconciliation, and Willingness**. Broadly, the theme of Recognition refers to the extent/level of detail with which the municipality acknowledges Indigenous communities' unique relationships with the land, and their distinct legal statuses. Reconciliation accounts for efforts at relationship-building, represented via integration of Indigenous practices and knowledge into municipal planning, as well as broader commitments to collaboration. Willingness accounts for the evidence of active initiative on the part of a municipality in pursuing this work, indicated via language and the adoption of more progressive legal/procedural principles. Each of these themes contains multiple sub-indicators further elaborating on their tangible or practice-based meanings. The framework then sets out 4 levels at which these indicators can be assessed. The levels are: inadequate (no mention), minimal, moderate, and significant. Further guidelines are then provided on how these particular criteria should be or can be met in OP development.

This report also presents **five specific recommendations** based on the research. These are:

- Measures must be taken to ensure adherence to (and implementation of) the 2020 PPS and all future revisions, as a large percentage of municipalities have already fallen behind, notwithstanding the latest revision. To ensure this, the Province should redouble its efforts on municipal education and capacity building in support of this.
- Third-party facilitators/mediators should be brought in to act as bridges between municipal and Indigenous actors throughout the implementation process, and to assist with capacity building, consultation and conflict resolution.
- Indigenous and municipal actors need to create, nurture, and sustain enduring relationships between them, which should be protected via mutually respected and culturally relevant agreements.
- In cases of reduced capacity (among either party) to engage in formal relationship-building/pre-consultation processes, informal alternatives should be pursued on a provisional basis.
- Municipal-Indigenous collaboration should extend beyond case-by-case, reactive consultation. Meaningful and collaborative relationships begin with the involvement of Indigenous communities' in early policymaking stages.

Glossary

Please Note: The definitions below are provided only to aid understanding and reflect the authors' intended usage(s) of each term in this report. They are not definitive definitions, and only serve to clarify the authors' understanding of the listed terms, based largely on a review of resources created by the UBC First Nations & Indigenous Studies Program.

Aboriginal
A collective noun used to refer to Indigenous people, nations, and communities within Canada. It is used as a keyword for the report's content analysis, reflecting its widespread usage following its inclusion in the 1982 Constitution Act.

Aboriginal Rights
This term refers to the distinct, inalienable land rights stemming from pre-colonization land use(s) by Indigenous communities, as affirmed by Section 35(1) of the 1982 Constitution Act.

First Nation(s)
This term is used in reference to Indigenous peoples that are neither Métis nor Inuit. The plural form is used in reference to those belonging to this distinct ethnicity.

Free, Prior, and Informed Consent
Free, Prior and Informed Consent is used in this report in reference to UNDRIP's usage of the concept. Broadly, this refers to processes of consultation that require the consent/permission of impacted Indigenous communities before a project can move forward.

Indian
This term is used in reference to those possessing the legal status tied to registration under the Indian Act. Though it may be an outdated term, it is included as a keyword for the report's content analysis on the basis of this usage, along with its broader usage in older planning documents.

Indigenous
A broad term used throughout the report in reference to communities and peoples with cultures, practices, and connections to the land that predate settler arrival. For the purposes of the report, this includes First Nations, Inuit, and Métis peoples within Canada.

Inherent Rights
This term refers to each Indigenous peoples' right to authority over their traditional lands, resources, and communities. Though affirmed via the 1982 Constitution Act, the full expression of this right is still an active area of negotiation and conflict.

Inuit
Inuit refers to those identifying as Inuk, and to the broader population of Inuit people - the majority of whom live in Canada's Arctic regions. Inuit are distinct from other Indigenous peoples in Canada (i.e. First Nations and Métis).

Métis
Métis is used throughout the report in reference to those identifying as belonging to the Métis culture, those holding Métis heritage via ancestry, and most commonly to Métis communities in Ontario. Métis heritage stems from the unique culture of those descended from mixed Indigenous-European settler parents.

Official Plans (OPs)
A municipal Official Plan lays out a given community's land use planning policies. It is the primary document through which PPS directives are implemented at the municipal level.

Ontario's Provincial Policy Statement (PPS)
The Provincial Policy Statement is issued by the Government of Ontario, and functions as a guiding document for municipal land use planning actions in the Province. Per the Planning Act, all planning decisions must be consistent with its provisions.

Treaty
Treaty refers to the various legal agreements struck between First Nations and settler governments - first the British Crown, then Canada. The Treaty-making process involved the negotiation of land disputes, and guaranteed distinct rights to the First Nation parties which have since been affirmed via Section 35(1) of the 1982 Constitution Act.

Treaty Rights
Treaty Rights refers to the distinct rights held by a given First Nation as a condition for/outcome of a given Treaty negotiation.

Truth and Reconciliation Commission of Canada Report
The Truth and Reconciliation Commission of Canada was a government agency in operation from 2008-2015, which was tasked with accounting for the damage inflicted upon Indigenous people and their communities via Canada's residential school system. In the Commission's report, the body provided a set of Calls to Action intended to redress the damage done, and to foster stronger, more equitable relationships between Indigenous peoples and Canada.

United Nations Declaration of Rights for Indigenous People (UNDRIP)
The United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP) is an international human rights tool adopted by the United Nations in 2007. Its intention is to provide a legal framework through which the individual and collective rights of Indigenous peoples are enshrined and protected. It is notable for its advancing of Free, Prior, and Informed Consent regarding projects that stand to impinge on Indigenous rights or interests. Notably, Canada initially voted against UNDRIP's adoption. At the time of this report, Canadian law is not yet in line with its provisions.

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Wampum Belt
A traditional, beaded belt used by Indigenous peoples to mark and codify significant agreements between communities.

INTRODUCTION

Introduction

Context of the Project:

Ontario's Provincial Policy Statement (PPS), 2014, was the first PPS to mention Indigenous roles and interests in the land-use planning process. The PPS 2014 stated that it was "important to consult with Aboriginal communities on planning matters that may affect their rights and interests" (PPS, 2014). Even though the PSS focused on the importance of consulting Indigenous communities, the language it used was merely that of "encouragement" to coordinate with Indigenous communities and give "consideration" to their interests. In the most recent Provincial Policy Statement, 2020, the previously non-directive language was amended to some degree. Along with recognizing that Indigenous communities have a unique relationship with the land and its resources, the PPS now also explicitly mentions that Indigenous communities have a unique role in "land use planning and development" and recognizes "the contribution of Indigenous communities' perspectives and traditional knowledge to land use planning decisions" (PPS, 2020). The PPS states that "planning authorities shall engage with Indigenous communities and coordinate on land use planning matters" (PPS, 2020). This language strongly suggests that planning authorities can no longer simply acknowledge and consider Indigenous land use planning practices and interests in their work, but also have a responsibility to engage with and implement them in a more meaningful way. In addition to this, the PPS specifies that "the Province, in consultation with municipalities, Indigenous communities, other public bodies and stakeholders shall identify performance indicators for measuring the effectiveness of some or all of the policies" (PPS, 2020).

Client and Project Brief:

In light of these recent changes, it becomes important to review how the PPS 2020 has been interpreted by Ontario's various municipalities, as well as the extent to which its directives have been implemented by each. Previous research and advocacy work conducted by Shared Path Consultation Initiative concludes that although some municipalities are starting to include references to Indigenous interests in their Official Plans (OPs), it is not clear how many municipalities have done so. This process has also been inconsistent with consideration of which specific 'interests' are addressed by the individual municipalities (these may include Aboriginal Rights, Treaty Rights, and/or Inherent Rights, as well as rights related to environmental justice, cultural heritage, and archaeological management, amongst others). Also uneven is the extent to which the municipalities have developed mechanisms for advancing and protecting these interests in their Official Plans, ensuring the involvement of Indigenous people in the creation and implementation of OPs, and measuring the impact of any efforts at inclusion.

Our aim in this project is to:

- Create a framework which can be used to evaluate the extent to which municipalities are including rightsholding Indigenous communities and governments in their land use planning process and the process of creating the Official Plans themselves; and

- To evaluate the Official Plans that have been reviewed after the PPS 2020, to determine the extent to which these municipalities have been responding to the changes in the PPS.

Through this framework and evaluation of the post-PPS 2020 Official Plans, our team aims to create a knowledge resource for our client, Shared Path Consultation Initiative. Shared Path is a charitable organization. At the core of their work are the Truth and Reconciliation Commission's Calls to Action 47, 57 and 92. As a response to these calls, Shared Path "seek(s) to provide opportunities and resources that enhance, inform, and facilitate Indigenous-non-Indigenous bridge building, particularly within the realm of land planning practice" (Shared Path, 2020).

Through various initiatives, Shared Path is focused on facilitating knowledge-sharing and relationship-building among Indigenous communities and municipal governments. In one of these initiatives, Shared Path's worked with Dali Carmichael, a graduate student, to study the extent to which Indigenous communities are recognized in the official plans of Ontario municipalities (Shared Path, 2020).

Our project builds on this research, specifically in the light of the recent amendments to the Provincial Policy Statement, 2020, to create a framework which can be: a) used as a tool to assess the extent of this recognition and assessment, and b) used as a tool that informs future Official Plans to establish best-practices.

By creating these deliverables, we aim to further the work of knowledge-creation, consultation and advocacy performed by our client. Our objective was to make these resources accessible to audiences beyond the traditional actors (like municipal planners), by including direct and measurable elements in our evaluation framework.

This evaluation framework can be utilized particularly by municipal planning authorities, as it provides clear directives which can be used to envision a new baseline for engagement and consultation with rightsholding Indigenous communities when creating and amending OPs. Beyond this audience, the knowledge resources created will be shared with the client's partner institutions, community consultation experts, and future planners.

In the next section of this report, we present the methodology through which we approached this project. This includes a brief literature review, interview process, and most elaborately, the process of manifest content analysis (MCA) of the Official Plans from all 444 municipalities in Ontario. The section is followed by an analysis of the MCA dataset, and visual representations of the findings. We then present our evaluation framework - with an introduction to the different categories, indicators and evaluators used in the framework, along with the logic behind each. This is followed by evaluation of three Official Plans - those of London, Baldwin, and Sables-Spanish Rivers - using the framework. In the last part of this report, we conclude our learnings from the project and provide recommendations based on our reflections and expert insights.

METHODOLOGY

Methodology

Since this project builds upon existing work, our methodology was partly inherited from the parent project provided by our client. This was then integrated with a methodology we developed after a thorough analysis of the currently available scholarly literature (McLeod et al, 2015; Cope, 2010; Porter and Barry, 2016).
The methodology that we employed to develop our evaluation framework can be broadly divided into four parts:

- Document Analysis of the Provincial Policy Statement, Truth and Reconciliation Commission final report, UNDRIP report, and other gray literature.
- Analysis of scholarly research that looks at collaborative planning in settler-colonial countries (specifically Canada and Australia) to inform the framework elements.
- Manifest Content Analysis of Official Plans from all 444 municipalities in Ontario, to develop a clearer picture of the current state of affairs.
- Interviews with experts, rightsholders and planners from 4 Indigenous communities in Ontario, who hold specific, context-specific knowledge and expertise that - though perhaps not accounted for in the literature reviewed - informs the framework contents.

Document Analysis and Literature Review:

We referred to Walker and Belanger (2013), DeVries (2011), Dorries and Tomiak (2019), Walia & Dilts (2018), and Simpson, (2008) to understand the broader historical context of Indigenous-settler colonial relationships, specifically in the context of land use planning as it currently exists in Ontario. This cultivated in us an understanding of the larger picture in which to situate the collaborative planning that this project hopes to enable - along with an understanding of the limitations of such a project, which operates primarily within the realms of settler-colonial planning, and is based on settler-colonial land use practices.

To develop a methodology for our project, we referred to existing scholarly work that seeks evidence of governmental initiatives and collaborations with Indigenous communities and land-use planning practices, or discusses the manner in which these can be achieved (McLeod et al., 2015; Porter & Barry, 2016; Vishwanath et al., 2013; McGregor, D., 2018). We then further developed our methodology via texts focusing on Indigenous knowledge systems, land relations, and planning practices (Mitchell, 2018; Simpson, 2014).

For a textual understanding of the existing best-practices in collaborative planning and government-to-government relationships between municipal/Provincial governments and Indigenous communities, we referred to Willimson (2010) and Saarikoski et al. (2013). We later triangulated this understanding of best practices with the observed processes and relationships on the ground via key informant interviews.

The gray literature we referred to focused on recommendations and reports from prominent civil society organizations and committees (Association of Municipalities of Ontario, 2019; Ministry of

Municipal Affairs and Housing, 2009; OPPI, 2019). We also referred to several policy documents- including the revised Provincial Policy Statements from 2014 and, 2020, the Truth and Reconciliation Commission final report and the UNDRIP report - the directives of which form the basis of this work.

Interviews:

A major part of our research included learning from the existing relationships between Indigenous communities and municipal governments. To this end, four semi-structured interviews were conducted with planners, experts, and leaders from rightsholding First Nations and Indigenous communities in Ontario. The experts were introduced to us by our client, based on their experiences in the field and their histories of working with Shared Path. The interviews were conducted in late October and early November 2020 and ran 45-60 minutes long. These interviews were conducted online and were divided amongst the team such that each member had the opportunity to talk to at least one of the experts - a learning experience that both the client and team highly valued.

The questions for these interviews were built around the themes of a) understanding Indigenous-municipal relationships broadly in Ontario, and specifically in the communities where the interviewees were based; b) best practices as observed by the interviewees; c) their general suggestions for improvement; and d) their suggestions for improving the language of land use planning practice and legislation to ensure it incorporates Indigenous rights, knowledge, and practices effectively. A full list of the questions asked can be seen in Appendix (2).

Manifest Content Analysis:

As part of the Descriptive Analysis process, a round of data coding was undertaken, drawing heavily on the Manifest Content Analysis methodology (Cope, 2010: as cited in McLeod and Vishwanath, 2015). This amounted to the collation of every explicit mention of Indigenous rights, communities, and interests in the 444 municipal OPs collected. Through this process, a significant amount of data was generated, though which the OPs could be examined quantitatively. As discussed earlier, this data collection process extended a previous effort undertaken by staff of the Shared Path Consultation Initiative. To reiterate, the Official Plans of every municipality in Ontario (n=444) were initially gathered via municipal websites. Subsequently, every reference to relevant First Nations, Métis, and Indigenous communities and their interests within each was gathered and collated via keyword searches ("First Nations", "Treaty", "Indigenous", "Aboriginal", "Métis", and "Indian"). During this process, relevant differentiating features were logged – in particular municipal tiers, place designations, applicable Treaties, and the year of PPS explicitly referenced in the Official Plan (if any). This provided us with a top-level insight into which jurisdictions have (to date) integrated any degree of engagement with Indigenous rights and interests into their local land use planning regime, and which have not. It also gave us an insight into the context and manner in which these terms were used, which further guided us in our evaluation of the degree of engagement and collaborative planning undertaken or initiated by the various local governments.

Coding:

The chosen differentiators, as mentioned in the previous section, made it possible to categorize each OP according to its unique characteristics, thereby allowing for more meaningful analysis - though each differentiator requires further explanation. Of key interest among the tags used was the municipal tier category – which, per the Province of Ontario functions as a marker of each municipality's "legal powers and responsibilities" (Government of Ontario, 2018). Likewise, the applicable PPS year provides a valuable insight into the active policy environment of each municipality. Though the year of Ministerial approval was considered as an alternative approach to achieve this, this tag was specifically chosen as a way to deal with an observed issue of lag-time between OP adoption by councils and subsequent Provincial approval – in some cases, a years-long delay. Likewise, in cases where OPs have been updated via amendment over the course of 20-30 years with no evidence of full review processes, this decision expedited analysis by eliminating the need to sift through each municipality's OP amendment history. Though there is arguably value in categorizing each municipality according to its self-identifier, the remaining tag – place designation – was only included as an additional mechanism to differentiate among the set on an exploratory basis and provides less analytical value due to the absence of legal significance attached to these designations.

A final category – the Treaty/Treaties applicable to the land(s) that each municipality occupies – was not included in this round of analysis due to challenges presented by multiple, overlapping Treaty territories. Despite this, this information was tagged throughout the dataset to aid future research.

Following data collection, the relevant content of each OP was coded via a binary system (1=yes, 0=no) to indicate the presence/absence of a given indicator within the text. To improve data quality, glossary entries/definitions and boilerplate text lifted from Provincial policy (e.g., the Growth Plan for Northern Ontario) were removed from the analysis. Irrelevant usages (e.g., 'indigenous flora') were not counted, and were likewise omitted from the analysis.

By its nature, this process largely only dealt with the "manifest" content (e.g. that which is readily observable and explicit), though in cases where a clear implication or reference was made that met the terms of the indicator, these were logged as well.

These indicators fall into two distinct content categories: structural (the common sections/topics in OPs in which keywords were found), and conceptual (the presence/absence of selected, relevant concepts, ideas, or approaches within the text). Each indicator is listed below, along with a brief explanation of its meaning.

Table 1: Indicators: Structural

Vision/Purpose/Basis	Keyword(s) mentioned in sections dealing with (or making reference to) the OP's intentions.
Direction/Objectives	Keyword(s) mentioned in sections dealing with (or making reference to) the OP's goals.
History	Keyword(s) mentioned in sections dealing with (or making reference to) local settlement history.
Cultural Heritage / Archaeology	Keyword(s) mentioned in sections dealing with (or making reference to) cultural heritage and/or archaeological management.
Environment	Keyword(s) mentioned in sections dealing with (or making reference to) environmental/natural resource issues.
Housing	Keyword(s) mentioned in sections dealing with (or making reference to) housing.
Infrastructure	Keyword(s) mentioned in sections dealing with (or making reference to) hard infrastructure provision.
Planning Context	Keyword(s) mentioned in sections detailing (or making reference to) the geographical planning context.
OP Review/ Monitoring	Keyword(s) mentioned in sections dealing with (or making reference to) OP review and amendment processes not related to archaeology.
Economic Development	Keyword(s) mentioned in sections dealing with (or making reference to) economic development.
Crown Lands	Keyword(s) mentioned in sections dealing with (or making reference to) Crown Lands.
Implementation	Keyword(s) mentioned in sections dealing with (or making reference to) the implementation and administration of the Official Plan.
Consultation	Keyword(s) mentioned in sections dealing with (or making reference to) consultation processes.
Other	Keyword(s) mentioned in sections dealing with (or making reference to) other topics not commonly observed throughout the set.

Table 2: Indicators: Conceptual

Recognition of Distinct Indigenous Interests	Expressed acknowledgment that Indigenous communities may have interests in planning processes distinct from those of settler communities.
Recognition of Indigenous Rights	Mention of unique rights held by Indigenous persons and communities (e.g. Treaty rights, S.35 rights, UNDRIP, etc.)
Mention of Specific Treaties/Negotiation Processes	Specific mention is made of any applicable treaties (or active land claim negotiation processes) underway in the planning context.
Specifically Name Indigenous Communities	Relevant Indigenous communities are noted by name, as opposed to via general catch-all terms.
Mention of Pre-Application Consultation	Pre-application consultation with Indigenous groups is mentioned within the document.
Standalone Section(s) re: Indigenous Nations/Communities	The planning interests/planning considerations applicable to First Nations, Indigenous, and/or Métis communities are housed in a dedicated OP section or subsection.
Expressed Interest in Extended Collaboration or Relationship-Building Processes	Broad mention of an interest in relationship building, extended collaborative processes, partnerships, or involvement in planning decision-making beyond project-based consultation.
Expressed Intent to Develop/Respect Non-Archaeological Consultation Protocols	A consultation protocol dealing with consultation beyond archaeology/Cemetery Act concerns is presented as either a protocol to be adhered to, or one the municipality will collaborate in the production of.
Commitment Notification and/or Consultation re: Development/Planning Activities not Related to Archaeology	Notification of development or consultation not tied to mandated archaeological triggers is explicitly committed to by the municipality.
Acknowledgment of Indigenous Nations/Communities as 'Jurisdictions' or Governing Bodies	First Nations, Métis, or Indigenous communities are discussed as jurisdictions/bodies to be negotiated with in planning decisions.
Mention of Indigenous Knowledges, Culture, or Traditions	Indigenous cultural practices, knowledge, and/or traditions are mentioned in the document.
Directive Language Tied to Commitments?	Commitments made regarding Indigenous communities are tied to directive language (i.e. shall/will/must vs. can/may/should). In cases where a mix of language is evident, content was tagged based on whether it was more or less directive on balance.

DATA ANALYSIS AND FINDINGS

Data Analysis and Findings

Following the data coding process, basic descriptive analysis was performed. This amounted to calculating the percentages of presence/absence of each indicator per OP and on aggregate, then breaking this data out and recalculating according to the relevant category in question. In doing so, performance could be calculated within the groupings of each identified differentiator (PPS year, municipal tier, and place designation).

The above process generated a significant body of insights into the present degree of inclusion of Indigenous interests, concerns, and rights into municipal OPs. This data is partially visualized below, and complete summary tables can be found in Appendix 2. A selection of key findings will be discussed in this section.

Limitations: Prior to discussing the findings of this process, a key methodological limitation should be noted. First and foremost, the approach employed – though effective in its intention of providing a broad stroke, high-level picture – is naturally at odds with the necessarily nuanced language of policy, planning, and municipal-Indigenous relations. As such, the data can be understood as capturing differences of 'kind' but not of 'degree'. In many cases, those municipalities that demonstrate relatively extensive engagement with Indigenous rights and interests are folded in with those which demonstrate relatively little interest. For example, in accounting for the usage of directive language, those with significant, detailed commitments are not counted any differently than those making the barest commitments to local Indigenous groups. In the same vein, a detailed, specific, and inclusive settlement history heavily featuring Indigenous communities is counted in the same way as a passing mention of an Indigenous community's historical presence in the area.

Selected Findings: Overall

Overall, across the Province of Ontario, 45.8% of municipalities currently include at least one of the identified keywords in their OP. In light of the previously noted methodological drawback, it bears reiterating that this figure captures the entire range of inclusions – from a cursory mention of Indigenous communities among stakeholders, to dedicated discussions of municipal-Indigenous relations.

Across Lower Tier municipalities, only 9.9% are included in this grouping, compared with 51.7% of Single Tier municipalities, and 80% of Upper Tier municipalities. Low rates of inclusion for Lower Tier municipalities can likely be explained by capacity issues, as well as the distribution of planning responsibilities between smaller communities and higher tiers of government.

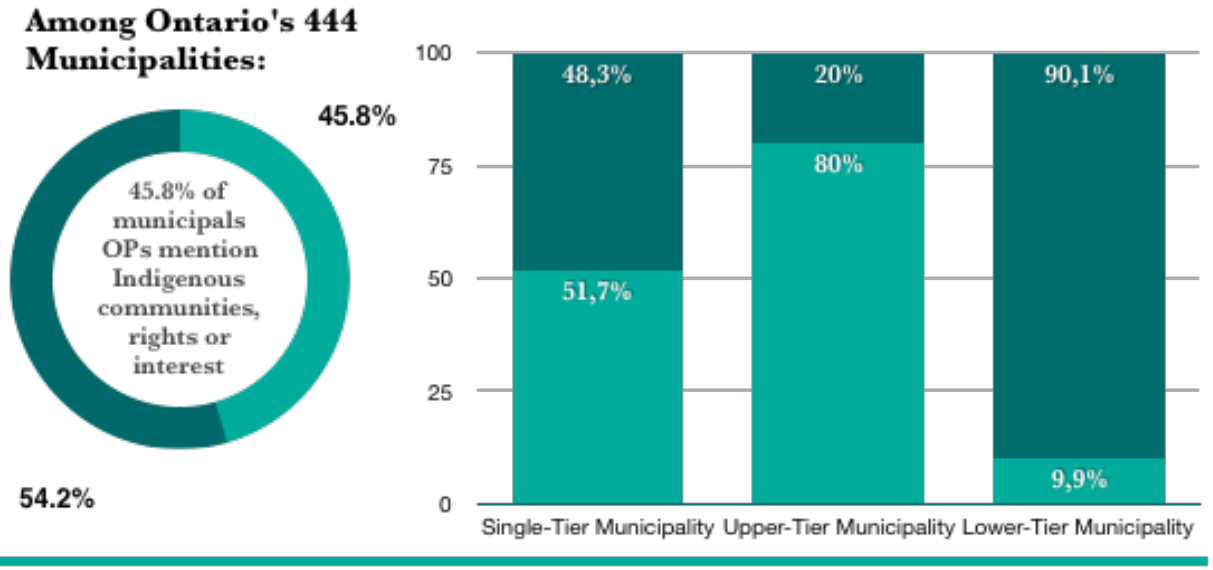
Among Single Tier municipalities, it should be noted that approximately 110 (plus districts) are in Northern Ontario, reflecting the Province's organizational structure (Government of Ontario, 2018). As noted by a key informant, though there is wide variation in municipal capacity across Ontario, relatively isolated Northern communities can reasonably be expected to have less planning capacity than others. As such, the interaction of the additional responsibilities of single-tier status and the

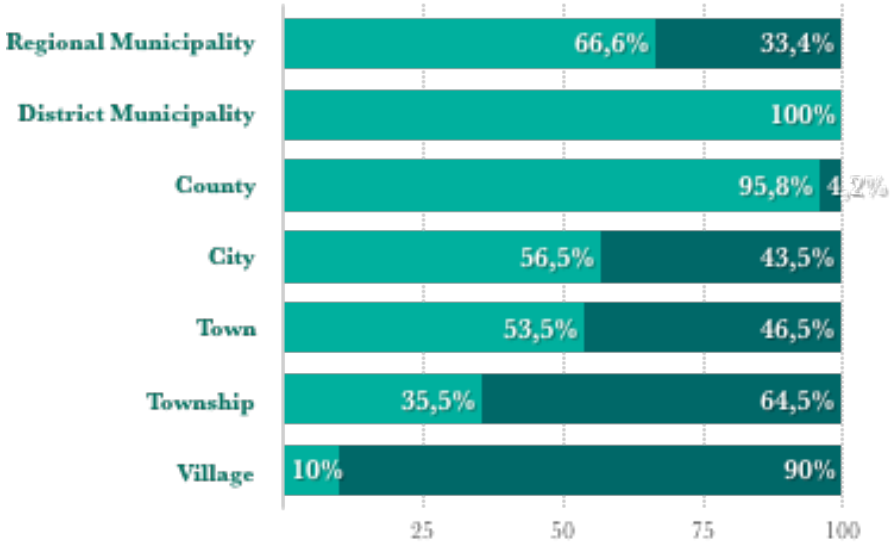
realities of capacity constraints might explain the relatively poor performance among what are ostensibly the most politically empowered municipalities.

Among the most striking findings is the degree to which the reviewed OPs rely on outdated PPS content as the basis of planning activities. Though it is no surprise that the 2020 PPS has not yet been widely incorporated into OPs, it is notable that the second-most recent PPS is not the most commonly referenced document. Rather, the 2005 PPS is the document most widely referenced in OPs throughout the Province (approximately 34% of OPs, compared to 32% of OPs for the 2014 PPS). Due to the significant proportion of OPs that do not explicitly specify the PPS version being referenced (and the challenges of deducing this based on amendment histories, as noted earlier), this finding – though striking – warrants further analysis.

Findings: Overall Percentage of OPs that Reference Indigenous Communities, Nations, Rights, Interests, etc.

(Note: See Appendix 2 for Complete Summary Tables)





Designaition	Overall
Regional Municipality	4/6
District Municipality	1/1
County	23/24
City	26/26
Town	46/86
Township	71/200
Village	1/10

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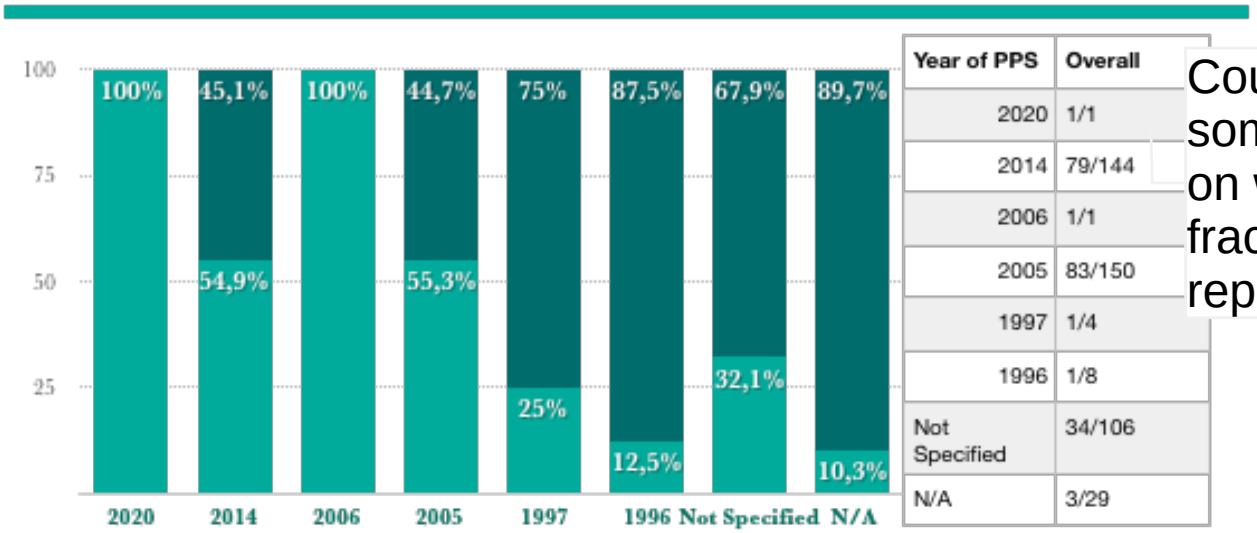


Year of PPS	Overall
2020	1/1
2014	79/144
2006	1/1
2005	83/150
1997	1/4
1996	1/8
Not Specified	34/106
N/A	3/29

Could use some clarity on what fractions represent

Selected Findings: Content (Structural)

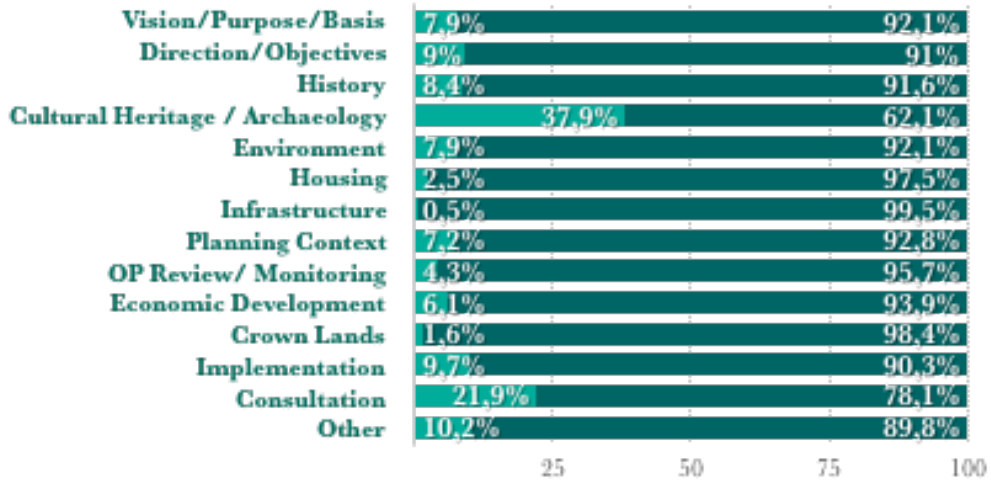
Unsurprisingly, recognition of Indigenous rights and interests in Ontario's OPs occurs most commonly in discussions of cultural heritage/archaeology and consultation practices (evident in 37.9% and 21.9% of OPs respectively). This holds true regardless of municipal tier, place designation, or year of PPS referenced. True to the overall observations, Lower Tier municipalities only show significant amounts of inclusion in these areas – perhaps reflecting the aforementioned capacity issues and divisions of power, and by extension challenges in taking things further.

Though this conclusion should be subjected to further analysis, it is suggested via the data collected that with each successive PPS issuance, the scope of Indigenous recognition has widened. Leaving aside the 2020 PPS and those for which data could not be collected, it is evident that between the sets of municipalities using the 1990s PPSs, the 2005 PPS, and the 2014 version, each successive version has induced broader recognition (on aggregate). Whereas the 1996 PPS set (n=8) shows 0 indicators with presence in >15% of the OPs, this number rises to 2 for 2005 PPS (n=150) and 3 for the 2014 PPS (n=144). Notably, however, the emphases shift: whereas (on aggregate) the set of OPs referencing the 2005 PPS show higher inclusion rates across the categories Vision, History, Heritage, OP Monitoring, and Consultation, those referencing the 2014 PPS have a relatively stronger showing across the categories of Direction/Objectives, Environment, Infrastructure, Planning Context, Economic Development, Crown Lands, Implementation, and 'Other'. In effect, the more updated OPs' relevant content is wider reaching - a shift perhaps embodying larger institutional shifts in the Province.

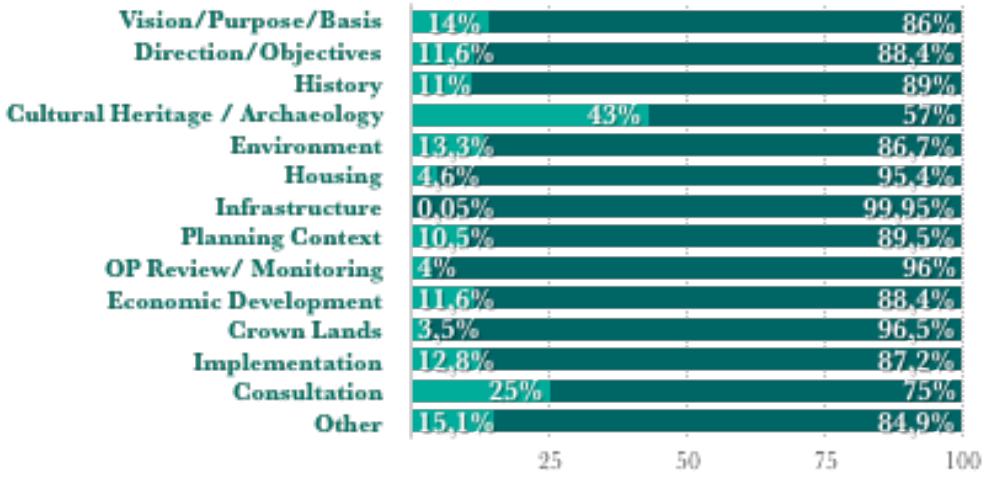
Findings: Mentions of Indigenous Nations, Concerns, Issues etc. Across Common OP Topics/Sections, by Municipal Tier and Designation

(Note: Appendix 2 Shows the Information in a Table Format)

Overall All Municipalities



Overall Single-Tier Municipality



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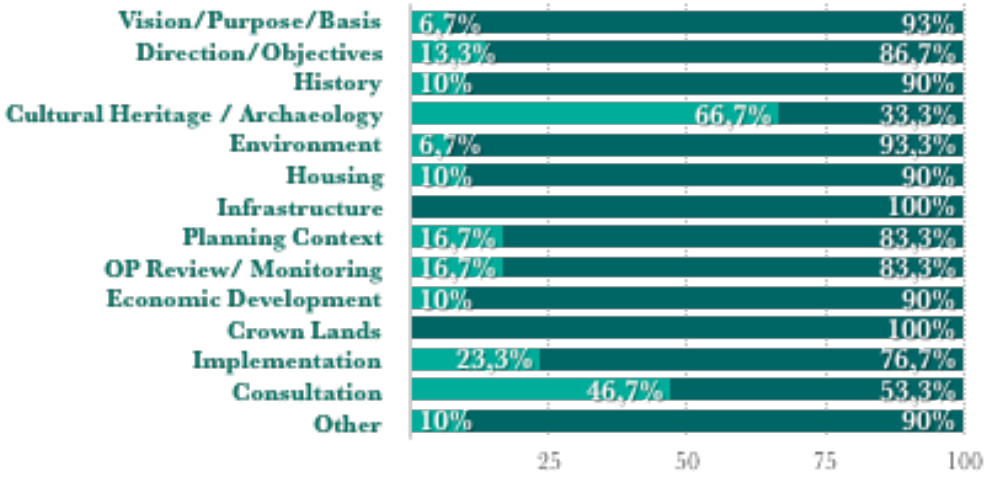
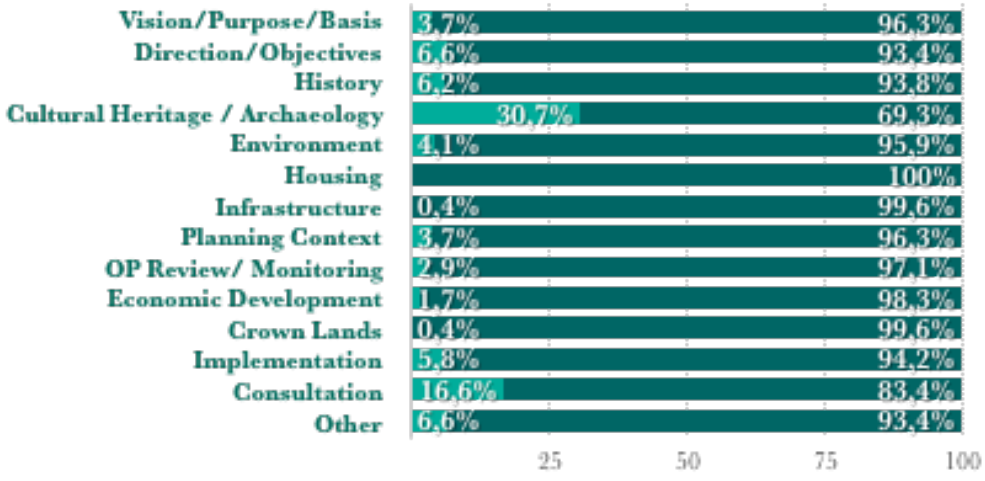
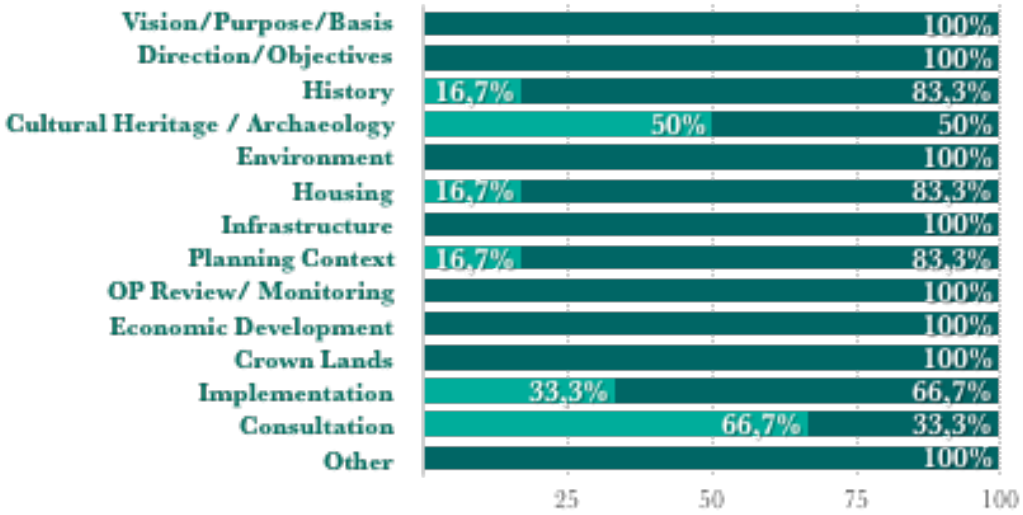


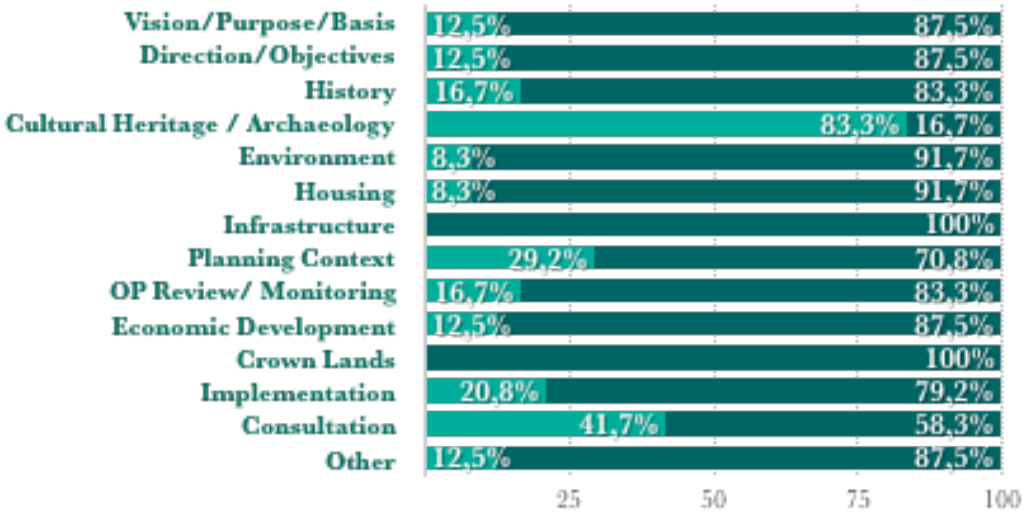
Overall Lower-Tier Municipality



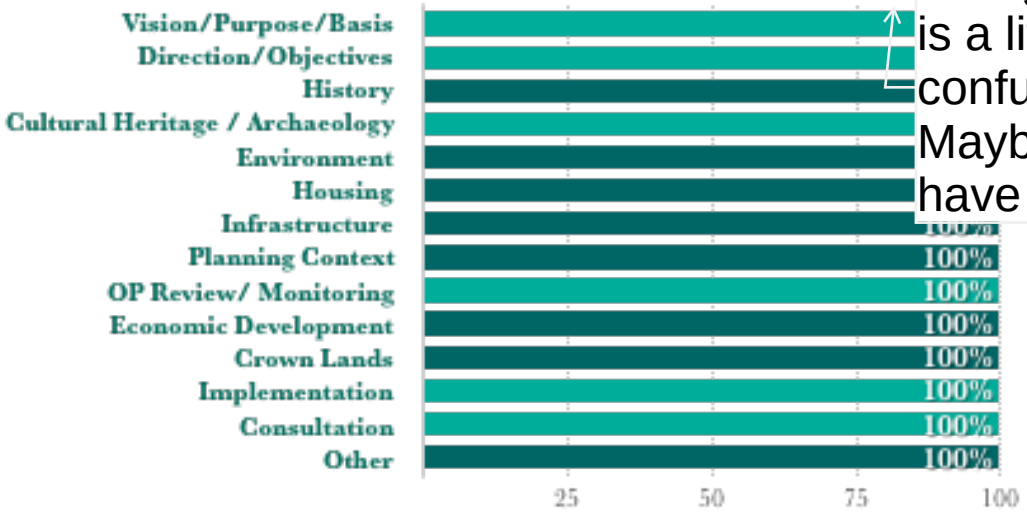
Overall Regional Municipality



Overall County

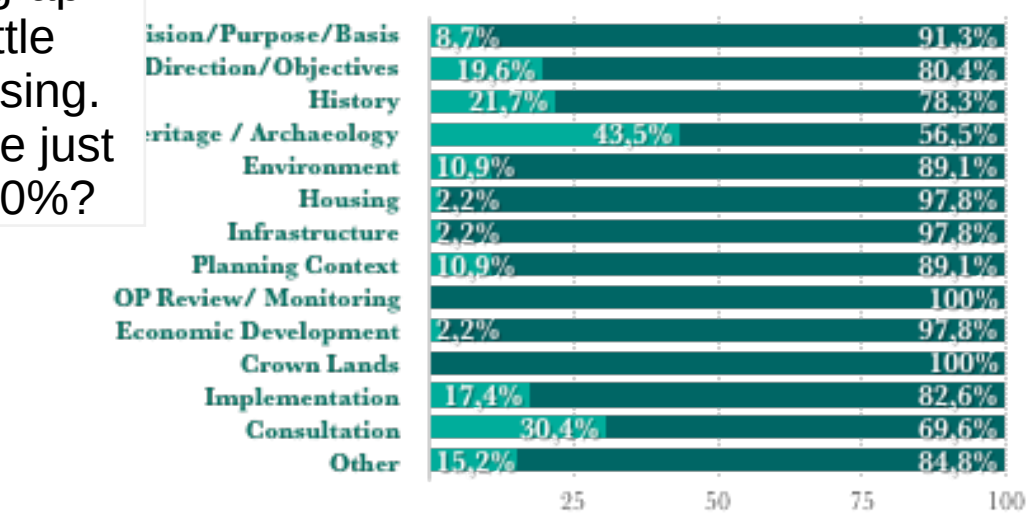


Overall District Municipality

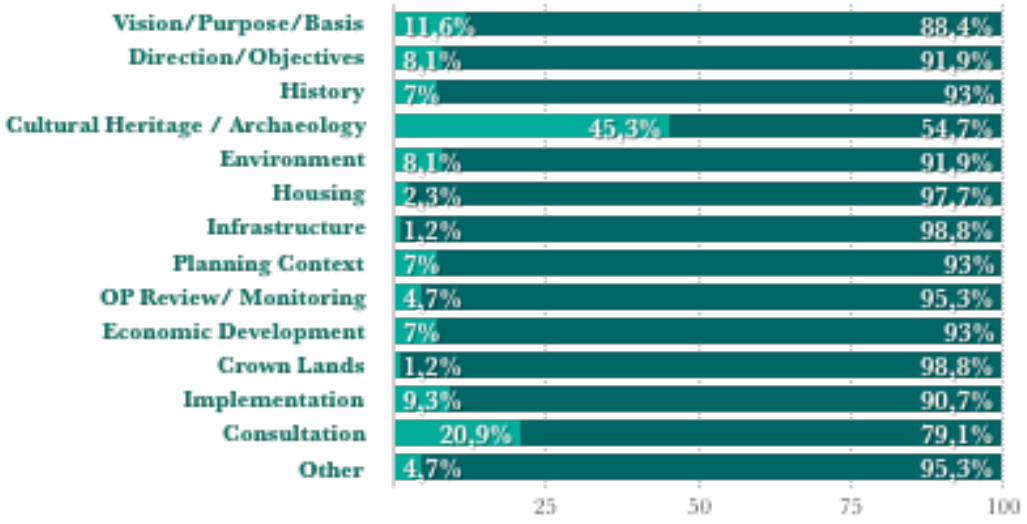


This graph is a little confusing. Maybe just have 0%?

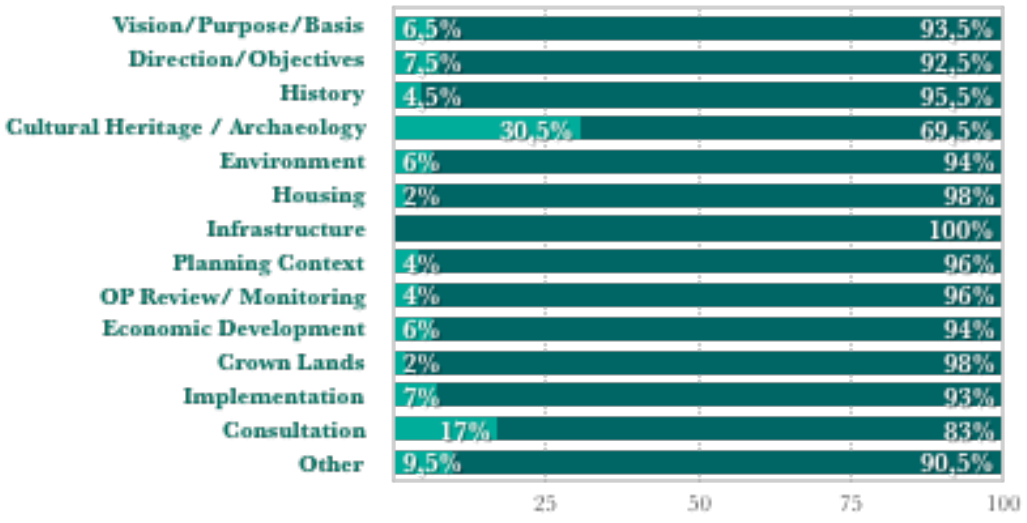
Overall City



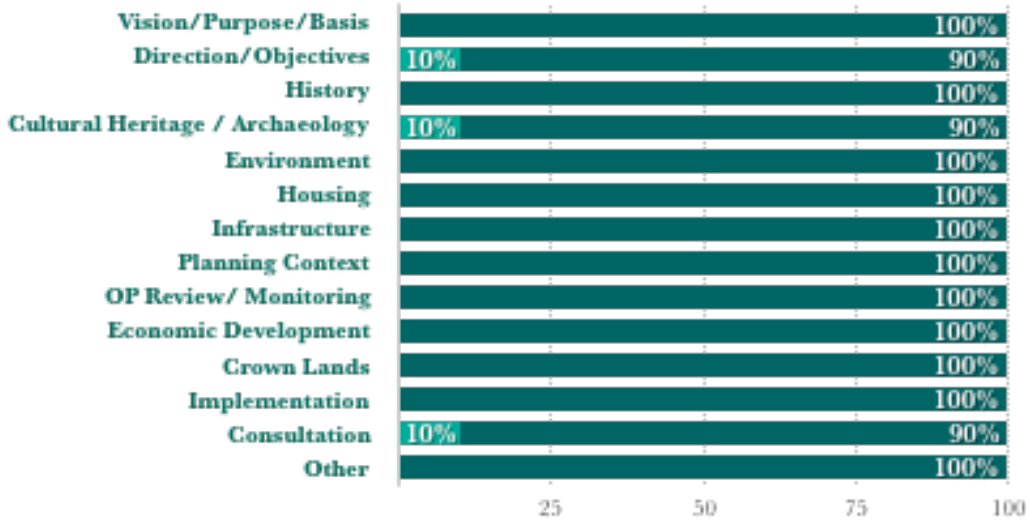
Overall Town



Overall Township



Overall Village

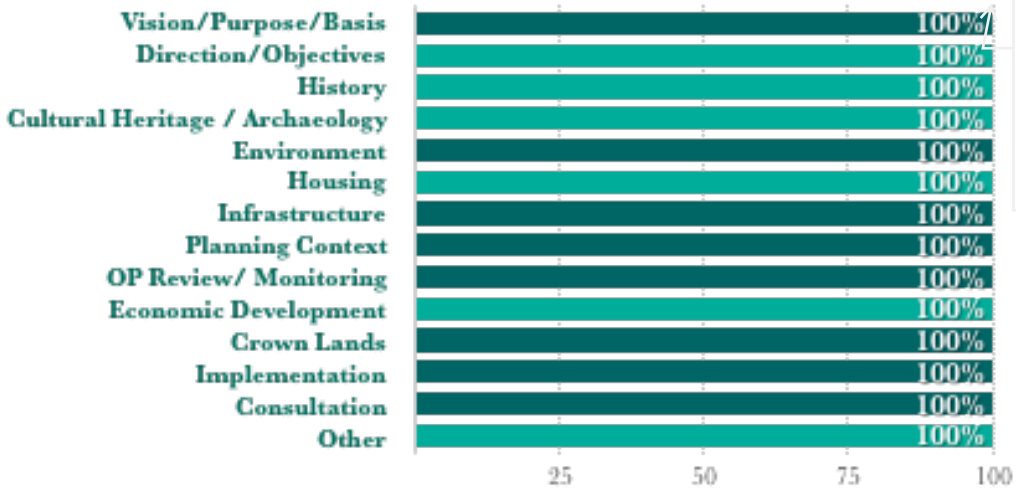


Findings: Mentions of Indigenous Nations, Concerns, Issues etc. Across Common OP Topics/Sections, by Year of PPS Referenced

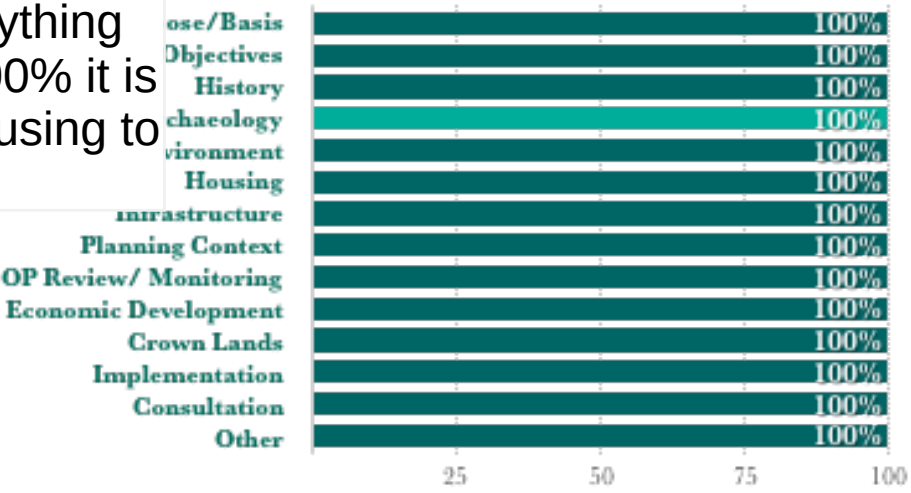
(See Appendix 2 for Complete Summary Tables)

Again, where everything is 100% it is confusing to read

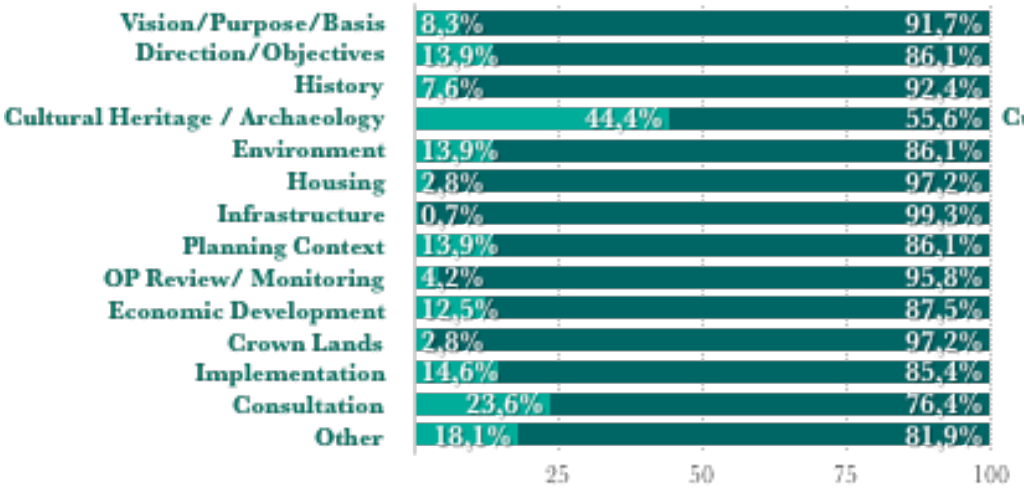
PPS 2020



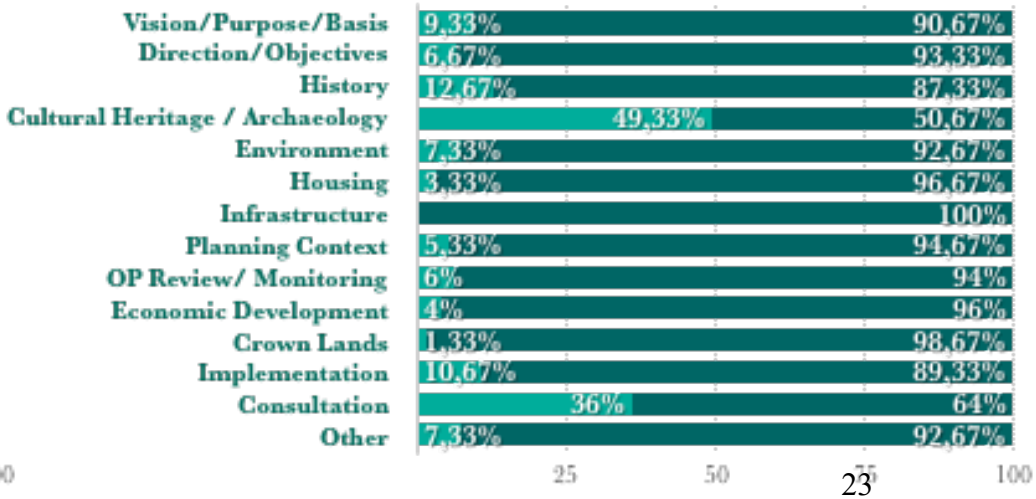
PPS 2006



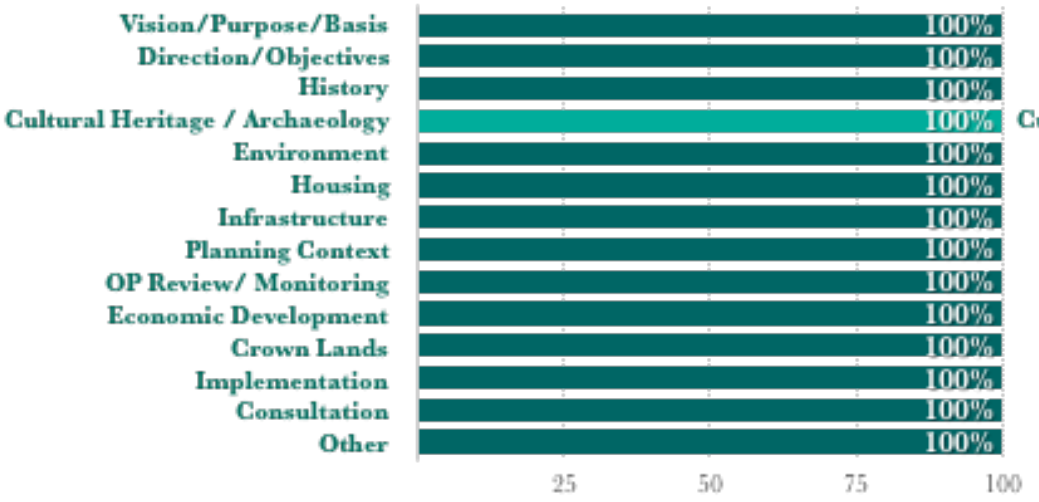
PPS 2014



PPS 2005



PPS 1997



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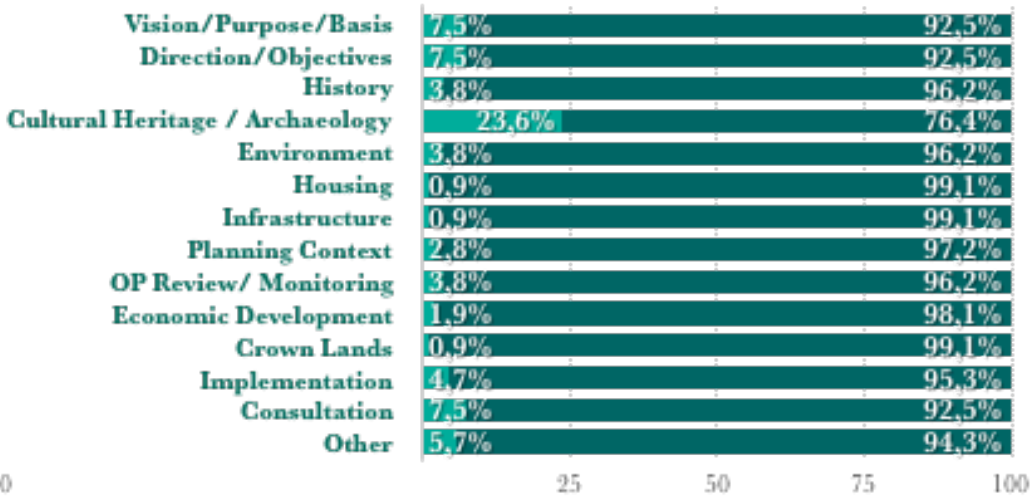
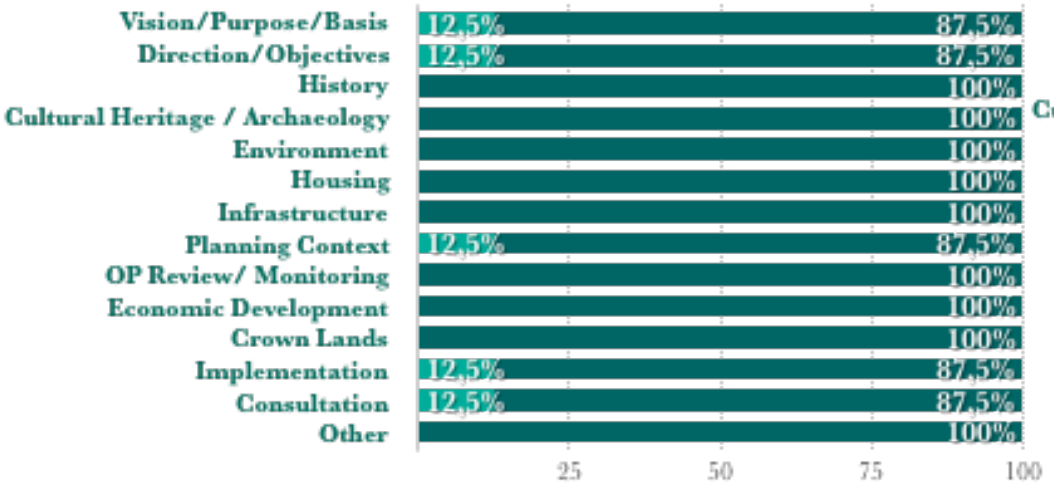


PPS 1996



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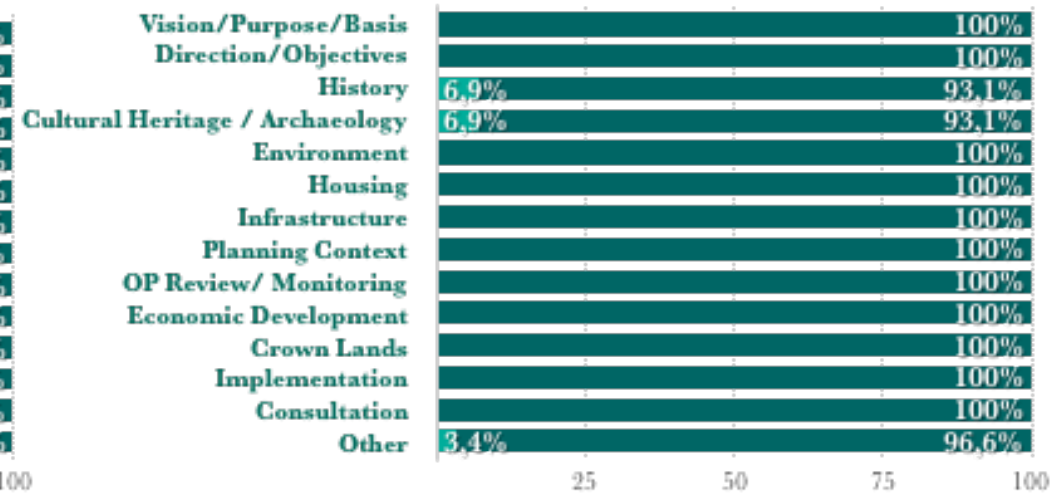


Selected Findings: Content (Conceptual)

Overall, the dominant ideas/concepts observed related to Indigenous rights and interests among the Province's OPs are the Recognition of Distinct Indigenous Interests and the use of directive language (evident in 20.5% and 32.4% of OPs, respectively). These strong presences can likely be attributed to external forces – it is expected that the inclusion of 'interests' as a term stems from its extensive usage in relevant Provincial and Federal policy, while directive language can (in some cases) be tied to the implementation of Provincial policies and legislation mandating certain actions. For example, notification of Indigenous communities regarding the discovery of ancestral remains is mandated in both the (now repealed) Provincial Cemetery Act (Government of Ontario, 2012), as well as the Funeral, Burial and Cremation Services Act (Government of Ontario, 2020) – both of which are referenced in a significant number of OPs.

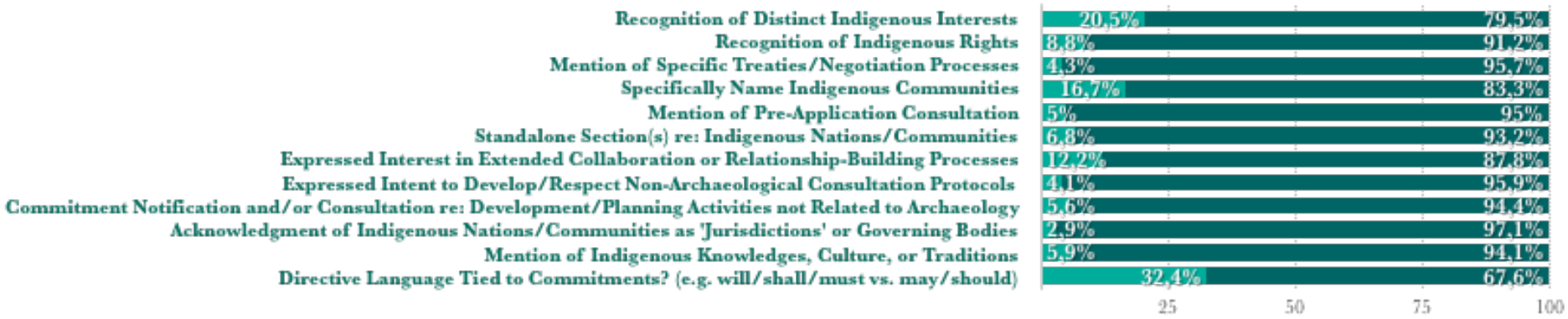
Beyond these, the most commonly observed content types were expressions of interest in developing relationships or engaging in longer term engagement processes with Indigenous communities (12.2% overall), and references to specific Indigenous communities by name (16.7%). The least common content types of the set were acknowledgement of Indigenous communities/Nations as "jurisdictions" in their own right (2.9%), intentions to develop non-archaeological consultation protocols (5.6%), and specific references to applicable Treaties or ongoing land claims and negotiation processes (4.3%).

As with structural content, each PPS revision seems to induce a wider scope of Indigenous recognition and engagement at the municipal level (though, as noted above, this should be subjected to further analysis). In the 1997 PPS set (n=4), only Directive Language is evident in <15% of OPs, whereas among the 2005 PPS set (n=150) Recognition of Distinct Indigenous Interests, Specific Naming of Indigenous Communities are well-represented as well. In line with the trend, among the 2014 PPS set (n=144) Recognition of Indigenous Rights and Expressed Interest in Extended Collaboration or Relationship-Building Processes are also evident in >15% of OPs, expanding the group of well-represented categories to 5. In the wake of the 2020 PPS' adoption, this is heartening: assuming all parties fulfil their responsibilities, the next 5-10 years should bring a further widening of observable inclusion and engagement of Indigenous rights, interests, and communities in municipal OPs.

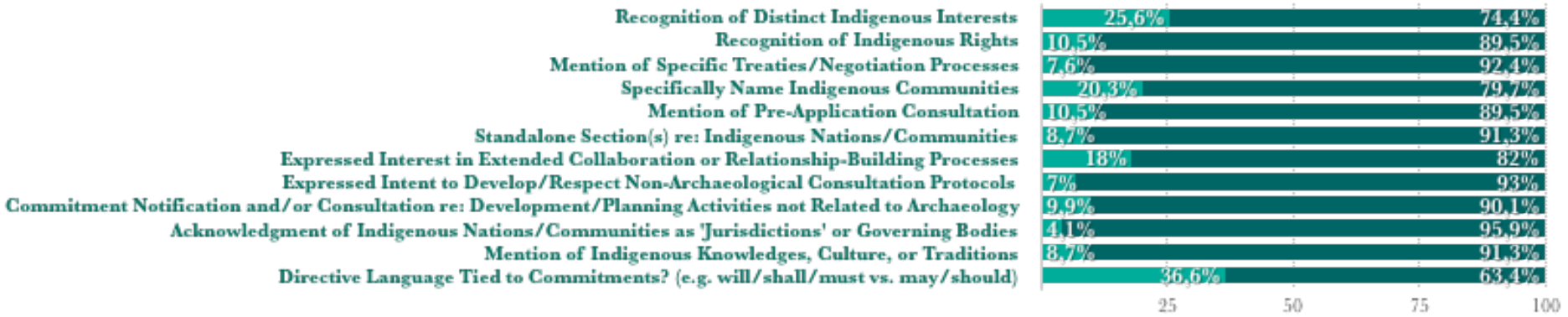
Findings: Mention Types/Relevant Concepts within OPs, by Municipal Tier and Designation

Note: See Appendix 2 for Complete Summary Tables)

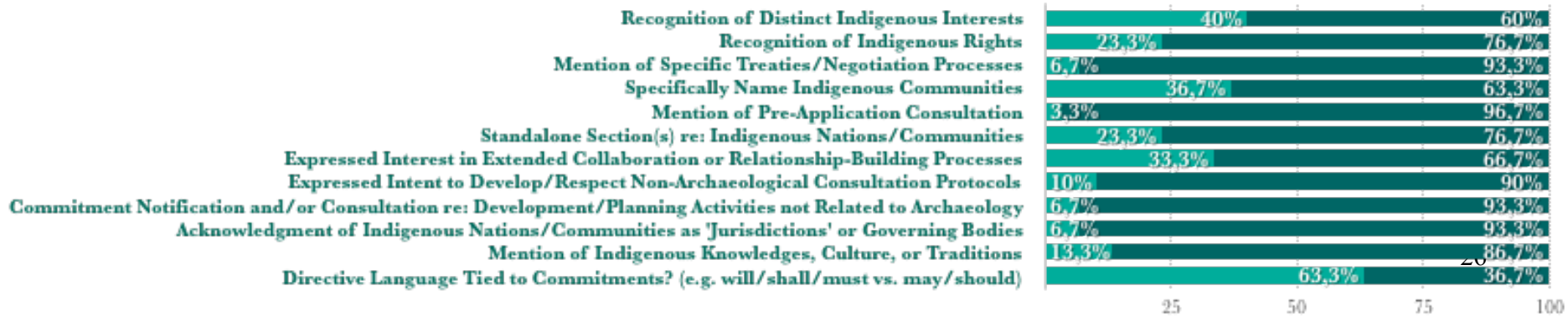
Overall All Municipalities



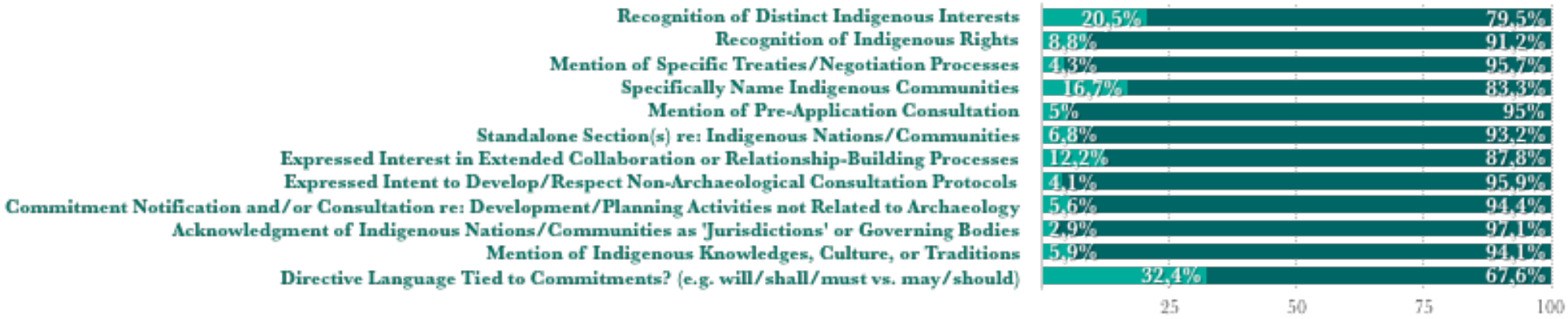
Overall Single-Tier Municipality



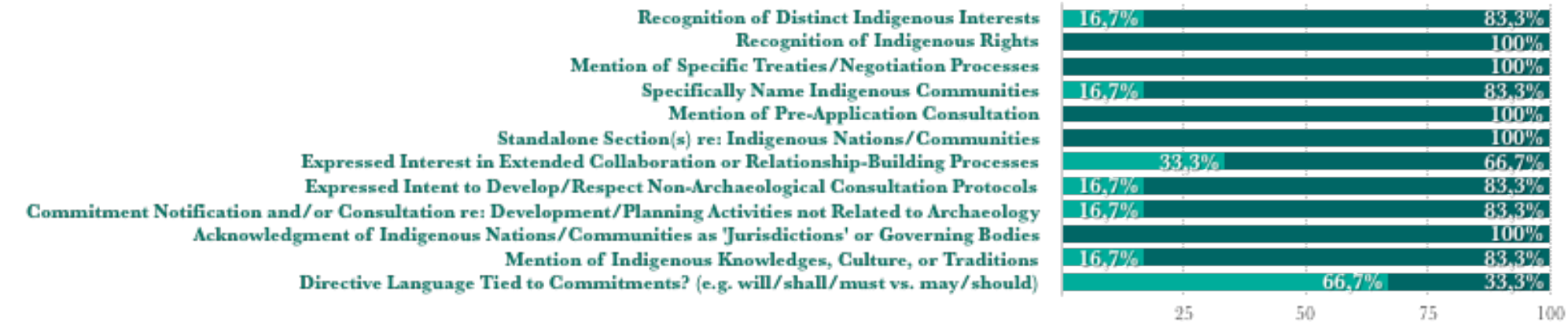
Overall Upper-Tier Municipality



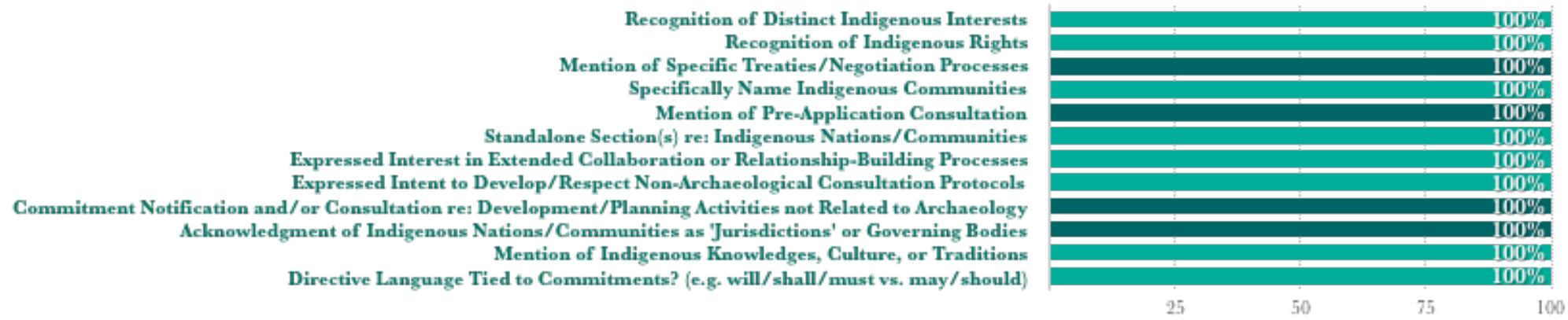
Overall Lower-Tier Municipality



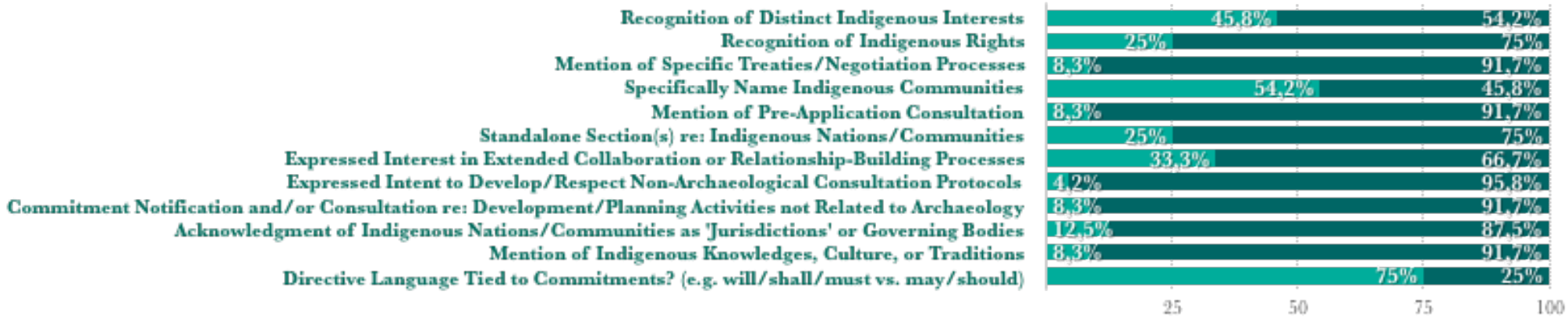
Overall Regional Municipality



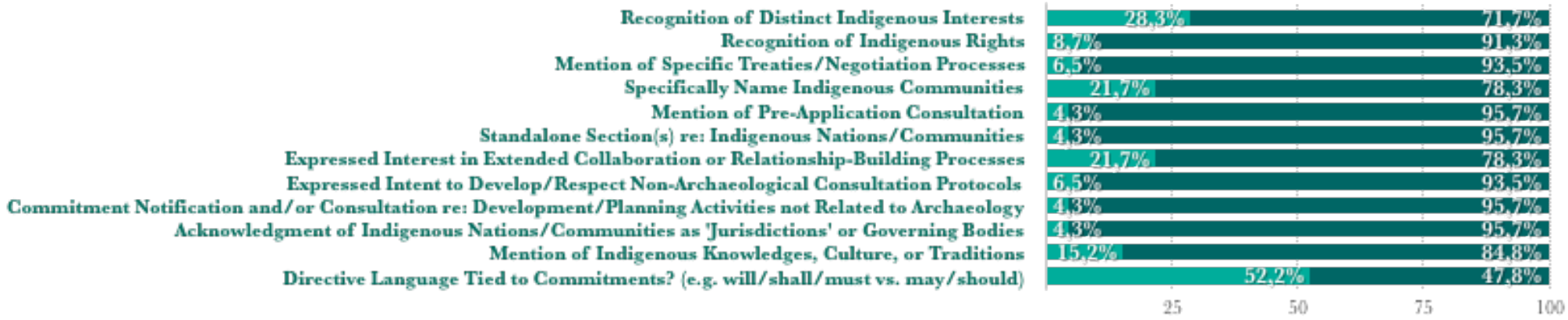
Overall District Municipality



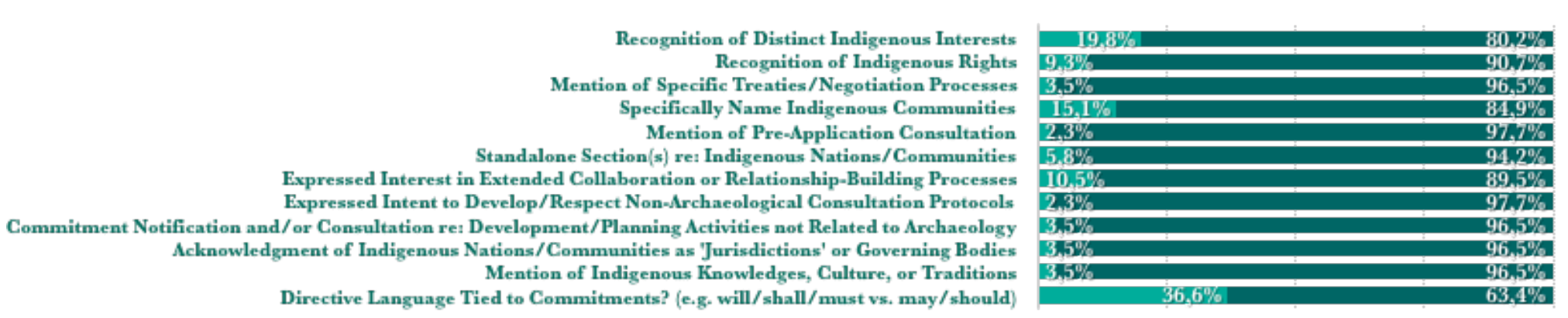
Overall County



Overall City



Overall Town



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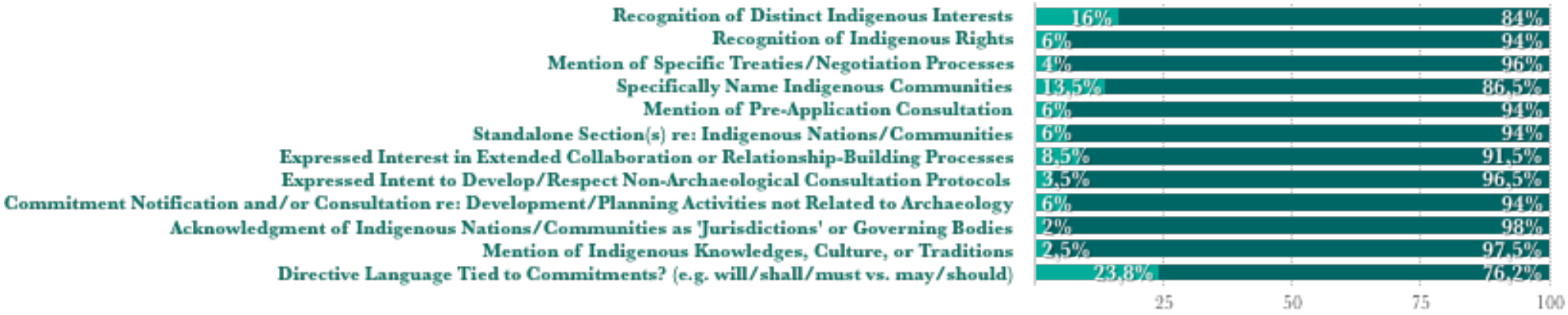
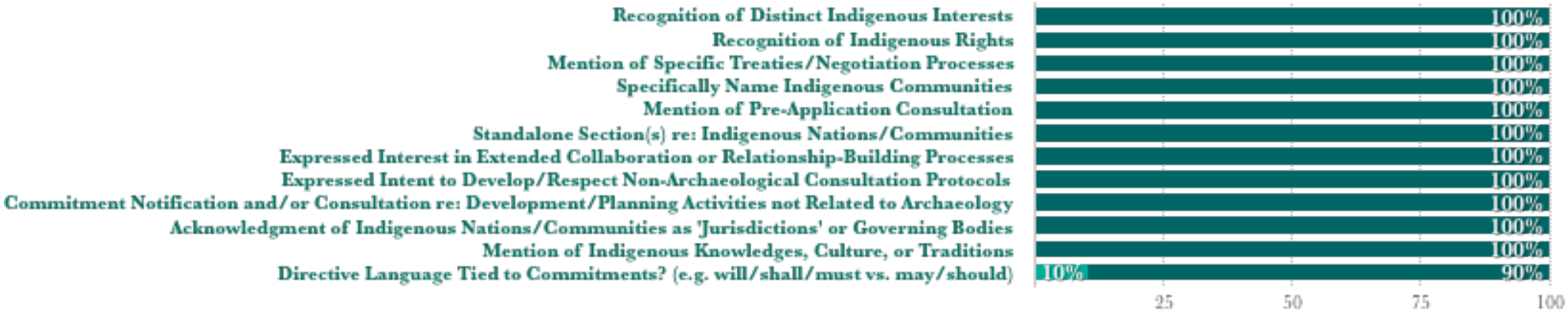
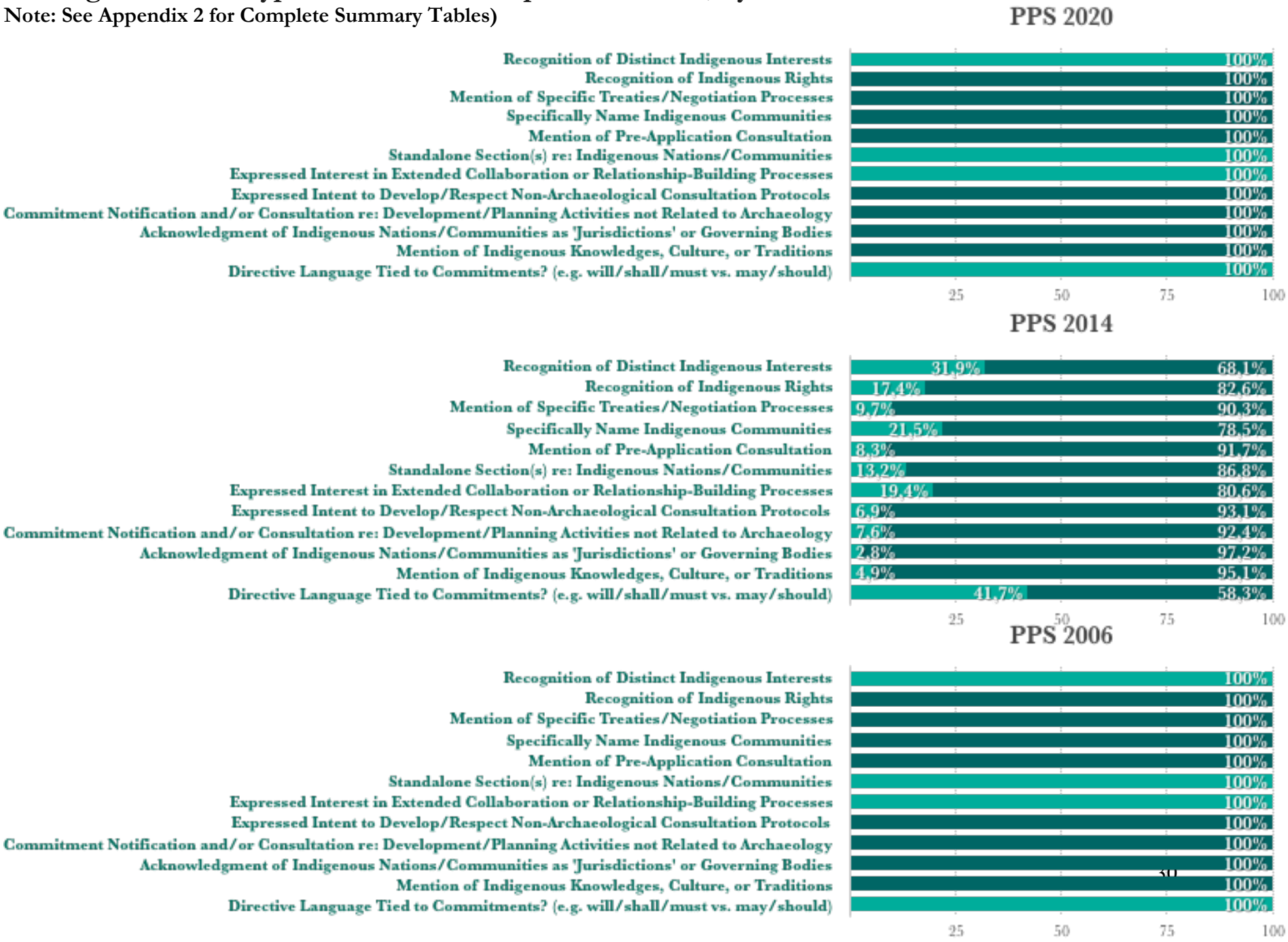


Overall Village

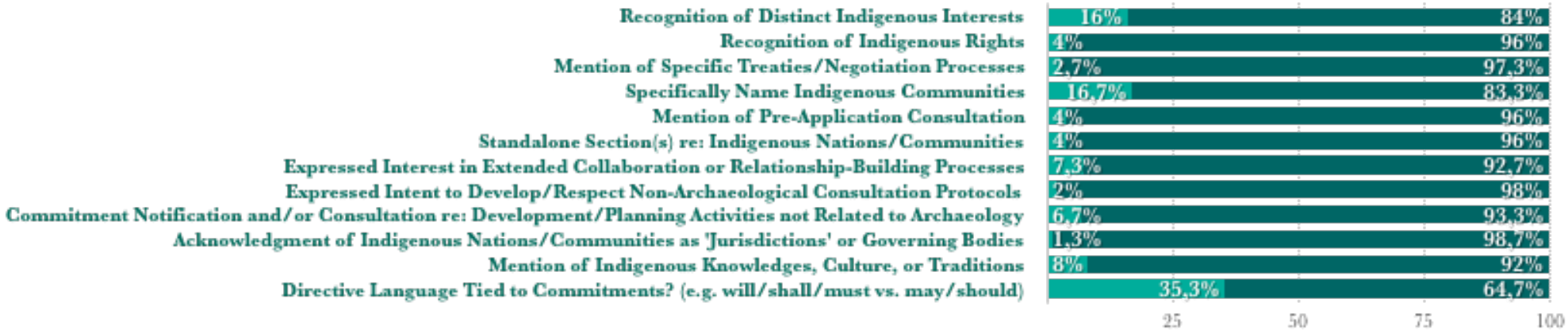


Findings: Mention Types/Relevant Concepts within OPs, by Year of PPS Referenced

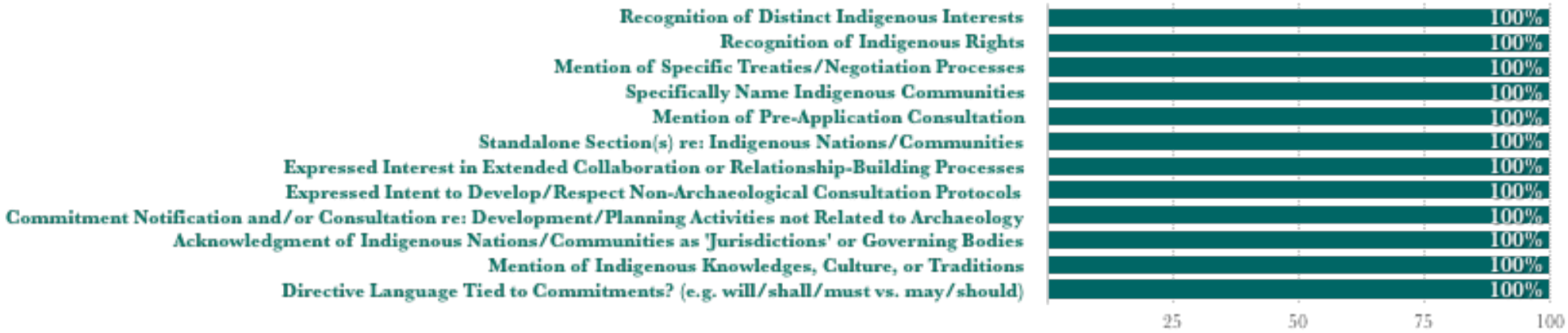
Note: See Appendix 2 for Complete Summary Tables)



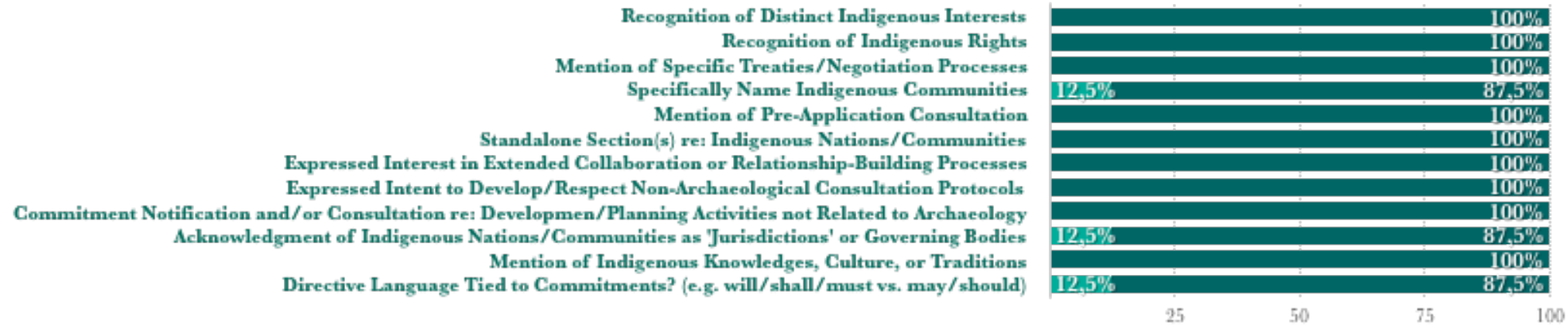
PPS 2005



PPS 1997



PPS 1996



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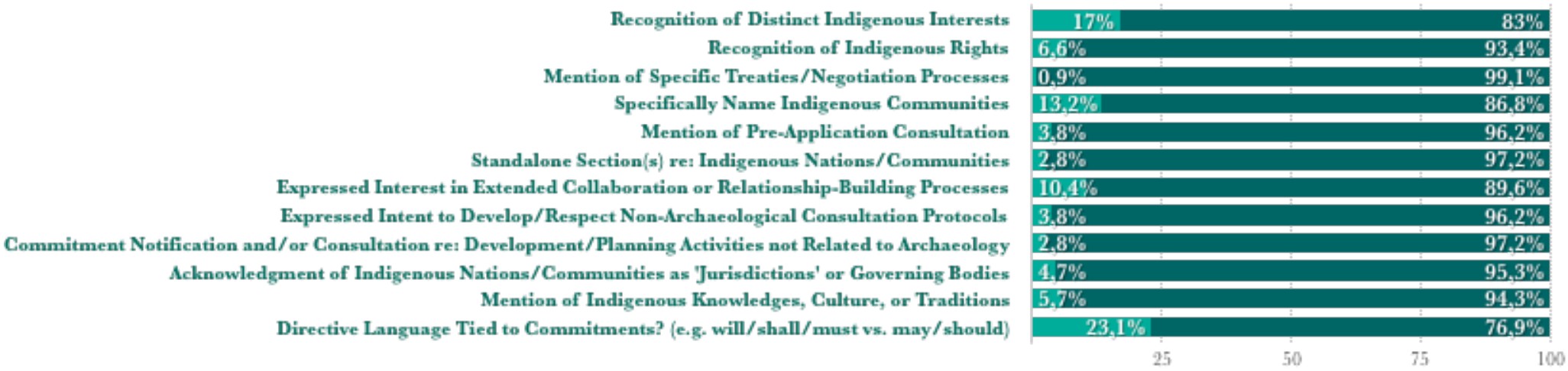

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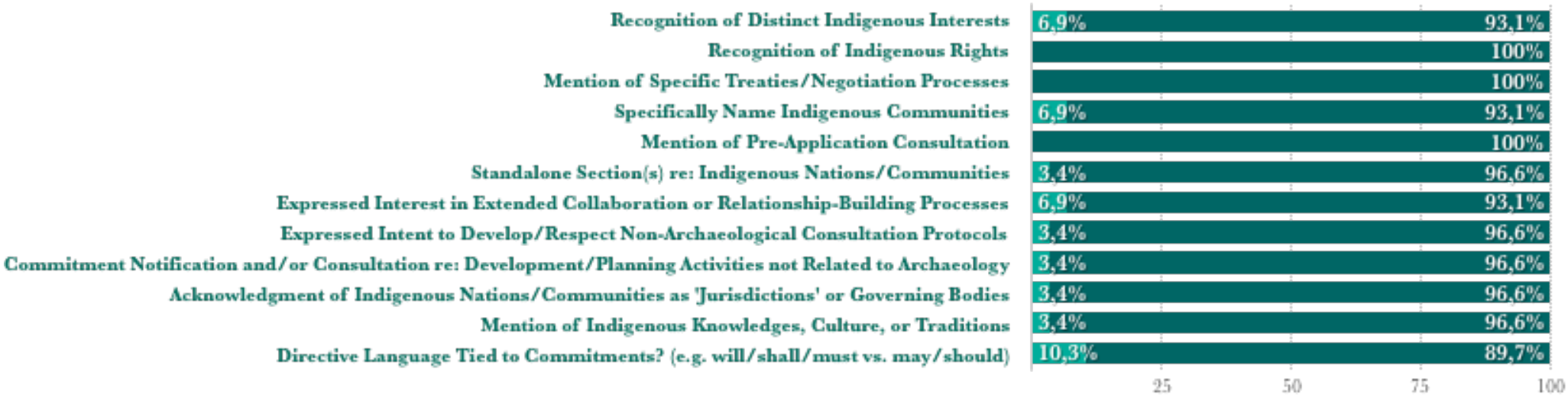

EVALUATION FRAMEWORK: DEVELOPMENT PROCESS AND REASONING

Evaluation Framework: Development Process and Reasoning

Category	Indicator	Inadequate (No mention)	Minimal	Moderate	Significant
Recognition	**Acknowledgment of Contemporary and Historical Indigenous land relationships**	No acknowledgment of Indigenous peoples/co-existence on the land.	Land acknowledgment, with no further inclusion of Indigenous rights or concerns. May use broad catch-all terms to refer to Indigenous communities.	Specific mention of Indigenous communities by name, discussion of historical dynamics between Indigenous communities and settlers.	Specific reference made to historical and contemporary Indigenous communities, their location(s), claims, and the history thereof. Critical understanding of relationships to date.
	Acknowledgment of Unique Rights Held by Indigenous Nations/Communities	No mention of the various rights held by Indigenous communities.	Generalized references to Indigenous communities holding unique rights in municipal negotiations - without any specific discussion on the nature of those rights.	Discussion of specific local treaties and the treaty rights held by Indigenous communities on the land.	Along with discussion of treaty rights, also specific references to relevant legal frameworks that protect the treaty and other rights. For example: S.35 of the Constitution, provisions from the TRC, UNDRIP, and specific local treaties, agreements, relevant court cases, etc.

	Acknowledgement of or Reference to Indigenous communities' "Unique Relationship with Land and its Resources", as Directed by PPS 2020	No acknowledgment of or references to Indigenous cultures, land relationships, and land use practices.	Generalized acknowledgment that Indigenous cultures, land relationships, and land use practices exist, and that they differ from settler norms and planning practices.	Generalized descriptions of Indigenous cultures, land relationships, and land use practices, without specific discussions about local Indigenous communities.	Discussions of local Indigenous cultures, land relationships, and land use practices that are relevant to land use planning in the area. Indigenous terminology used and explained where appropriate. Active involvement of local Indigenous communities in long-range land use planning practices.
Reconciliation	**Knowledge Sharing**	No mention of Indigenous knowledge(s) / worldviews. No tools for knowledge sharing between Indigenous communities and settlers.	Generalized recognition of the knowledge held by Indigenous communities	Clear directives to include and refer to Indigenous knowledge as a part of planning processes.	Evidence of including local/relevant Indigenous knowledge and jurisprudence in decision-making. Clear pathways for knowledge sharing between Indigenous and non-Indigenous communities.
	Cultural Protection(s) - Heritage and Archaeology	No specific cultural heritage processes specific to culturally	Cultural heritage management processes conform to Provincial policy, but	Heritage plan proactively identifies culturally significant areas for	Heritage plan proactively identifies areas culturally significant for Indigenous communities, and involves

		significant Indigenous sites.	do not go beyond established minimums.	Indigenous communities.	expertise from Indigenous communities in the identification, assessment and decision-making stages. Protection and conservation of cultural landscapes promoted as an option.
	Role of Indigenous Communities in Planning	No specific mention of Indigenous communities as rightsholders or collaborative partners in the planning process.	All local Indigenous communities generalized as stakeholders - without any recognition to their specific rights to the land.	Evidence of or reference to co-management practices. Collaborative planning as a suggestion - with no calls to action or clear pathways to achieving this.	Evidence that righsholding Indigenous communities are treated as collaborative partners in planning. This may be in the form of reference to their sovereignty, their right to self-determination, government-to-government cooperation, or relationship-building processes, etc.

	Relationship Building	No efforts to build active relationships with treaty and rightsholding Indigenous communities on the land.	Some evidence of relationship building via consultation activities - for example, informal meetings between Indigenous and municipal actors, to clearly define when consultation requirement is triggered. The decisions made via these informal discussions are re-evaluated regularly.	Evidence of relationship-building focused on short-term goals, like project-based consultations. May be some evidence of incorporating or acknowledging Indigenous knowledge/relational practices, but no directives for long-term relationship building.	Active relationship building between Indigenous and municipal governments, including knowledge-sharing, capacity building and conflict resolution. Can be facilitated through third party organizations. Evidence of long-term relationship building, which is enshrined in culturally-relevant agreements (such as wampum belts).
Willingness	**Initiative Displayed**	No mention of efforts at engaging with Indigenous interests.	Recognition only of the 'need to act', without actionable commitments. Use only of enabling language: 'should' Mentions of engagement only in the cultural heritage and archaeology sections.	Mix of directive and enabling language "shall" intermingled with "should"/"encouraged" used while referring to municipal commitments to Indigenous communities.	Active, directive language ("shall") used throughout, while referring to municipal commitments to Indigenous communities. Specific actions are mandated.

	Process of Consultation	No mention of need for consultation with local Indigenous communities.	Mention of the need to consult, without specific discussion on and directives for how the process will take place.	Pre-development consultation with the appropriate rightsholding Indigenous communities. The OP recognizes specific roles and responsibilities of the various actors in the consultation process, and their authority.	Municipalities strive to conform to "free, prior, and informed consent" from Indigenous communities in consultation processes. May include a mechanism for formal negotiations/collaborative planning between Indigenous groups and municipality or a right of refusal on projects. Conflict resolution options/ mechanism in place. To offset burden(s) of consultation and build capacity, municipality contributes to funding of consultation efforts undertaken by Indigenous group(s).

The evaluation framework is divided into three major theoretical categories, under which we place more nuanced and practice-based indicators which can be easily identified as themes in the Official Plans. The three theoretical categories are: **Recognition, Reconciliation, and Willingness**. The evaluation matrix for each of the indicators is then further measured along a scale of a) Inadequate (no mention); b) Minimal; c) Moderate, and d) Significant. In the evaluation matrix, specific actions are identified, which the OP should include to qualify for each of the evaluation levels.

This structure and approach to evaluation has in parts been derived from insights from McLeod et al. (2014), McLeod et al. (2015), and McLeod et al. (2017), each of which undertake similar work to develop analytical frameworks for assessing provincial policy documents on their inclusion of Indigenous Rights, map the evolving provincial policies in the light of PPS 2014, and conduct a comparative analysis of the 2014 PPS and the 1999 Auckland Council Regional Policy Statement (ACRPS) of Aotearoa New Zealand.

The specific actions identified in the evaluation matrix under each measurement criteria were developed by including insights from our informants, and triangulating with them our learnings from the literature. The progression from 'Minimal' to 'Significant' broadly charts an aspirational course of evolution from general and tokenistic inclusions, through to more specific and progressive approaches. This same logic broadly applies across every indicator and category. It is not expected that any OPs will fully meet the requirements laid out for 'Significant' inclusion of Indigenous rights or interests at present. Rather, this higher category represents an envisioned set of 'targets' for municipal actors as they move forward with implementation.

The first theoretical category is 'Recognition'. Broadly, this category accounts for the depth and extent of acknowledgment of Indigenous communities' unique relationship with the land, as well as their distinct legal statuses within an OP. It is constituted by three distinct indicators: a) acknowledgment of contemporary and historical land relationships; b) acknowledgment of unique rights held by Indigenous communities; and c) acknowledgment or reference to Indigenous communities' "unique relationships with land and its resources", as directed by the new PPS (Government of Ontario, 2020).

For each of these indicators, the minimal to significant range is based on a) the specificity of OPs in referring to the rightsholding Indigenous communities, their histories and land relationships; and b) the evidence of involving the righsholding Indigenous communities in planning practices. In evolving from 'Minimal' to 'Specific', a municipality is expected to move away from generalized, non-specific statements, through to the incorporation of locally-specific content, and onwards to the incorporation of specific, higher-level progressive legal/rights-based frameworks and non-settler knowledge(s) into OPs.

The second theoretical category is 'reconciliation'. This category broadly deals with the work of developing and maintaining meaningful relationships between municipal and Indigenous bodies, insofar as this can be achieved via the planning process. It contains four indicators: knowledge sharing, cultural protection, defined roles in the planning process, and broader commitments to relationship building. Evidence of knowledge sharing is to be found in the actual incorporation of Indigenous knowledge(s) within the body of the OP. At the higher tiers, this knowledge should be incorporated into planning and decision-making activities, with the process of achieving this supported by clearly-defined knowledge-sharing mechanisms to allow municipal actors to learn from Indigenous communities - either formal or informal. The second indicator, focusing on cultural protection via

archaeology and cultural heritage policy, is a key field of action for municipal-Indigenous engagement, as (to date) this is arguably where the most significant work has been done in terms of developing municipal obligations. This indicator thus spans an evolution from conformity with legally-mandated protocols of consultation, through more proactive approaches to identifying sites of cultural value to Indigenous groups, and finally to creating policy that prioritizes the protection of these identified places (as opposed to removal/consultation undertaken as a pathway to move forward with planned development). Broadly, these higher tiers reflect the recommendations of Williams (2010) in their piece on Ontario's archaeological management regimes. The progression from 'Minimal' to 'Significant' for the planning roles ascribed to Indigenous communities charts a course from simple piecemeal consultation to meaningful, enduring, and collaborative partnerships. In the same vein, relationship building develops along a course from casual, regular check-ins on planning matters (in line with a key informant's recommendation for the 'minimum') through to formalized processes that proactively deal with the development and maintenance of collaborative partnerships, in ways that are culturally meaningful for both parties.

The final section of the framework is intended to assess evidence of a municipality's willingness to engage with the work of altering their practices to properly incorporate Indigenous rights and interests. Key to this is the indicator of 'Initiative' - measured via the proxy of directive (as opposed to passive) language tied to the municipality's stated commitments to Indigenous communities. The second indicator in this section looks at the prescribed consultation processes in the OP - another key field of action where municipal-Indigenous relationships frequently play out. The lower tiers connected to this indicator progress from generalized acknowledgment of the need to consult Indigenous communities when required, through to clearly defined processes for fulfilling this obligation. To be considered on the higher-end of the scale, municipalities should demonstrate efforts to incorporate the principle of "free, prior, and informed consent" into land use decisions, create conflict resolution mechanisms, and provide material assistance (if and when required) in order to support Indigenous communities in meeting the capacity demands of consultation.

Framework Application

To demonstrate the framework's usefulness, it has been used to assess the Official Plans of three different municipalities in Ontario. These three municipalities are: Baldwin, London, and Sables-Spanish Rivers. Since the project aims to assess the extent to which municipalities have incorporated the Provincial Policy Statement 2020's directives into their Official Plans, these municipalities were selected based on the timeline of their Official Plan revisions/updates. According to a review of publicly available information, each of these three municipalities has either released a new OP in the wake of the 2020 PPS adoption and imply conformity (e.g. their OP was accepted by the municipal council after the adoption of the 2020 PPS, and states that the 'current' PPS is being referred to), or are in the midst of an OP review process that was well underway at the time of the PPS 2020's adoption in February 2020.

Process of Framework Application:

In the case of these three municipalities, references to Indigenous rights and interests (gathered through the data collection process) were used, and mapped against the evaluation framework. This evaluation was done in a qualitative way, with the content interpreted only with regard to the chosen indicators. These included, but were not limited to: a) passive vs directive language; b) generalized vs. context-specific acknowledgements; c) tokenistic consultation vs. early-engagement and FPIC-seeking consultations; and d) short-term partnership vs. long-term relationships, among others. A complete list of indicators is visible in the framework itself.

Our interviews with experts reaffirmed our understanding that no singular framework can capture the different contexts of municipal-Indigenous relationships in Ontario. There exists a starkly diverse range of capacities and contexts in which various municipalities and Indigenous communities operate in the province. One of the ways in which we accommodate this complexity in our framework is by presenting our evaluation findings in a qualitative, recommendation-based manner, as opposed to a point or rank-based evaluation system. To put it simply, evaluating a small, northern single tier municipality with limited capacity in the same manner as the City of Toronto (or other municipalities with the capacity to undertake highly sophisticated policy work) would not be useful.

Indicator by indicator, the relevant content from each OP has been considered against the framework's provisions. Based on our qualitative review, the content was then marked in the appropriate tier - ranging from minimal to significant. The next section will present our findings from this exercise

Findings from Framework Application to London's Official Plan:

London Ontario, is a single-tier municipality in the Middlesex region of Southwest Ontario. It is situated on the lands of Chippewa of the Thames, the Oneida of the Thames, and the Muncey Delaware Nation. Though approved in 2016, the Official Plan of London is currently under appeal. As such, it was included in our analysis as an example that is being actively shaped within the current policy context. Though the provisions of the London OP may not have initially been written with the 2020 PPS in mind, it is our assumption that - as a result of an extended appeal process that spans two PPS versions - it ought to make reference to the newly approved policy direction.

Category	Indicator	Evaluation Inadequate (no mention) | Minimal | Moderate | Significant	Notes and Relevant Content from the Official Plan
Recognition	**Acknowledgment of Contemporary and Historical Indigenous land relationships**	**Minimal:** Land acknowledgment, with no further inclusion of Indigenous rights or concerns. May use broad catch-all terms to refer to Indigenous communities.	Specific mentions of Chippewas of the Thames First Nation, Munsee-Delaware Nation and Oneida Nation of the Thames in one section (Cultural Heritage: 5.5.2) only, without a discussion of historical dynamics or land relationships.
	Acknowledgment of Unique Rights Held by Indigenous Nations/Communities	**Inadequate:** No mention of the various rights held by Indigenous communities.	No mention.
	Acknowledgement of or Reference to Indigenous Communities' "Unique Relationship with Land and its Resources", as Directed by PPS 2020	**Minimal:** Generalized acknowledgment that Indigenous cultures, land relationship and land use practices exist, and that they differ from settler norms and planning practices.	Names Chippewas of the Thames First Nation, Munsee-Delaware Nation and Oneida Nation of the Thames, but only in reference to their unique relationships with cultural resources (Section 5.5.2).

Reconciliation	**Knowledge Sharing**	**Moderate:** Clear directives to include and refer to Indigenous knowledge as a part of planning processes.	In Cultural Heritage Conservation: mentions the Indigenous communities as stakeholders who will be cooperated with (Section 5.7.1). Section 6 frequently calls for knowledge-sharing initiatives with "appropriate First Nations" in reference to archaeological heritage management.
	Cultural Protection(s) - Heritage and Archaeology	**Significant:** Heritage plan proactively identifies areas culturally significant for Indigenous communities, and involves expertise from Indigenous communities in the identification, assessment and decision-making stages. Protection and conservation of cultural landscapes promoted as an option. Heritage plan proactively identifies culturally significant areas, and involves/promotes involvement of Indigenous groups in assessment stage and decision-making. Protection/conservation of cultural landscapes promoted as an option.	Directive language ('will') used in reference to cooperating with First Nations while protecting and conserving heritage resources that may cross property, geographical or jurisdictional boundaries. Directives for consultant archaeologists to consult with appropriate First Nations in reference to preserving archaeological resources on site. Where on-site preservation is not possible, direction is to address First Nations' interest in the resource to identify interpretive and commemorative opportunities related to the resource. Directives to notify First Nations in advance of on-site assessment work

			in case of Stage 2 and 3 archaeological assessments on First Nations' archaeological resources. Also provisions to include a monitor for assessment work (Sections 6.1.3; 6.1.4; 6.1.8). Directives on notifying and inviting First Nations during the preparation of the Archaeological Management Plan (section 6.1.0). Copy of assessment report to be provided to appropriate First Nations in cases where archaeological resources are documented and found to be First Nations or Indigenous in origin (6.1.9). Directives on consulting relevant First Nations on issues of burials (Section 6.2.1): 'Appropriate First Nations to be provided notification in regard to the identification of burial sites and 'significant archaeological resources relating to the activities of their ancestors'. Directives to invite First Nations to participate when the City of London

			initiates the preparation of an Archaeological Heritage Management Plan (16.3.1).
	Role of Indigenous Communities in Planning	**Moderate:** Evidence that righsholding Indigenous communities are treated as collaborative partners in planning. This may be in the form of reference to their sovereignty, their right to self-determination, government-to-government cooperation, or relationship-building processes, etc.	While not mentioning rightsholding Indigenous communities by name, there are directives to invite to participate - at an early stage - Indigenous communities that are "appropriate"/ "relevant" in the planning process and in the creation of policies like the Heritage Management Plans.
	Relationship Building	**Minimal:** Some evidence of relationship building via consultation activities - for example, informal meetings between Indigenous and municipal actors, to clearly define when consultation requirement is triggered. The decisions made via these informal discussions are re-evaluated regularly.	Directives to create a working relationship (Section on 'Vision' for London 2035, Vision 56) with neighbouring First Nations communities and to explore opportunities for collaboration on common objectives.
Willingness	**Initiative Displayed**	**Significant:** Active, directive language ("shall") used throughout, while referring to municipal commitments to Indigenous communities. **Specific actions are mandated.**	The OP presents evidence of willingness to engage in a collaborative planning process. Including directives to invite First Nations to participate when the City of London initiates the preparation of an Archaeological Heritage Management Plan (16.3.1).

	Process of Consultation	**Significant:** Municipalities strive to conform to "free, prior, and informed consent" from Indigenous communities in consultation processes. May include a mechanism for formal negotiations/collaborative planning between Indigenous groups and municipality or a right of refusal on projects. Conflict resolution options/ mechanism in place. To offset burden(s) of consultation and build capacity, municipality contributes to funding of consultation efforts undertaken by Indigenous group(s).	Directives to engage at the pre-development stage, in terms of development, cultural and archaeological heritage management. Directives to invite consultation from First Nations in the early stages of policy creation. These can be found in multiple instances in Section 6 in the context of archaeological resources, and in Section 4.5.6 in the context of policies for infrastructure development.

The Official Plan from London includes multiple, positive indications of their intention and will to incorporate Indigenous interests, knowledge, planning practices, and peoples in the planning process. It also provides directives to collaborate with Indigenous communities in policymaking processes. However, most of these initiatives are limited to cultural heritage and archaeological resource management. While the plan repeatedly states an intention to undertake planning and consulting with 'relevant' Indigenous communities, it rarely names the communities or defines what makes them 'relevant'. In processes other than cultural and archaeological heritage management, Indigenous communities are mentioned alongside (but not differentiated from) other stakeholders, and have not been identified as rightsholders. The OP shows initiative and willingness to collaborate as partners with the Indigenous communities in reference to the Archaeological Management Plan, where it provides directives to notify and invite "appropriate First Nations" to participate if such a plan is made (section 16.3.1).

Findings from Framework Application to Baldwin Official Plan:

Baldwin, Ontario is a single tier municipality in the Sudbury region. It is situated on the territory of Treaty 61 - also known as the Robinson-Huron Treaty, which was signed in 1850. The most recent Baldwin Official Plan was approved with modifications on May 28th, 2020. It has also recently been approved by the Ministry of Municipal Affairs and Housing.

Category	Indicator	Evaluation Inadequate (no mention) | Minimal | Moderate | Significant	Notes and Relevant Content from the Official Plan
Recognition	**Acknowledgment of Contemporary and Historical Indigenous land relationships**	**Minimal:** Land acknowledgment, with no further inclusion of Indigenous rights or concerns. May use broad catch-all terms to refer to Indigenous communities.	Introduction uses generalized language, without specific acknowledgments of land and land relationships. (Section 1.0) "With a legacy of more than 10,000 years of Indigenous settlements…"
	Acknowledgment of Unique Rights Held by Indigenous Nations/Communities	**Minimal:** Generalized references to Indigenous communities holding unique rights in municipal negotiations - without any specific discussion on the nature of those rights.	Broad mentions of Indigenous communities having interests, without specifically naming the rightsholding communities. (Section 3.2) "Unique housing needs for Indigneous, homeless and older persons".
	Acknowledgement of or Reference to Indigenous Communities' "Unique Relationship with Land and its	**Moderate:** Clear directives to include and refer to Indigenous knowledge as a part of planning processes.	The OP mentions coordination with an 'Indigenous Interests Council' and provides directives.

	Resources", as Directed by PPS 2020		(Section 2.10.6) "Indigenous Interests Council, in conjunction with area municipalities, will collaborate and coordinate land use planning matters with Indigenous communities and will consult with respect to the conservation of archaeological resources and cultural heritage landscapes."
Reconciliation	**Knowledge Sharing**	**Moderate:** Clear directives to include and refer to Indigenous knowledge as a part of planning processes.	In the Social Cohesion and Wellbeing section, directives have been given for knowledge-sharing and collaboration. Again, no mention nor indication of involving the rightsholding communities. (Section 5.2.6) "Creating a forum for dialogue and joint decision-making on community and land use matters with Indigenous people".
	Cultural Protection(s) - Heritage and Archaeology	**Minimal:** Cultural heritage management processes conform to Provincial policy, but do not go beyond established minimums.	Multiple sections broadly mention the intention to collaborate and coordinate on land use planning matters with Indigenous communities, and the will to consult - specifically with regards to conservation of archaeological resources and cultural heritage landscapes. However, this is done without providing directives on how this process will take place.

	Role of Indigenous communities in planning	**Minimal:** All local Indigenous communities generalized as stakeholders - without any recognition to their specific rights to the land.	Indigenous communities are mentioned as stakeholders in some of the initiatives or planning goals. However, they are framed as one of several stakeholders, as opposed to rightsholders. (Section 1.2) "Coordinate land use decisions with the Indigenous community, area municipalities and other affected parties".
	Relationship Building	**Minimal:** Some evidence of relationship building via consultation activities - for example, informal meetings between Indigenous and municipal actors, to clearly define when consultation requirement is triggered. The decisions made via these informal discussions are re-evaluated regularly.	The OP provides some direction on relationship building, such as creating a forum for "dialogue and joint decision making on community and land use matters with Indigenous people." However, this is done without specific mention of how this relationship will be sustained and strengthened.
Willingness	**Initiative Displayed**	**Minimal:** Recognition only of the 'need to act', without actionable commitments. Uses only enabling language: 'should' Mentions of the engagement only in the cultural heritage and archaeology sections (as directed by the PPS)	Some directive language is used, but no clear pathways for action are provided. (Section 6.6.2 Municipal Heritage Advisory Committee Council) "Council will consult with Indigenous people in the preparation of such plans."
	Process of Consultation	**Minimal:**	

		Mention of the need to consult, without specific directives for how the process will take place.	Several mentions of need for consultation, without specific directives on how to conduct this consultation, and at what stage.

The Baldwin Township Official Plan references the changes from PPS 2020 and indicates some changes that move towards deeper engagement with Indigenous communities and their interests. However, on our scale, most of these efforts are 'minimal', barring a couple that can be considered 'moderate'. Though Indigenous communities are mentioned, there is no specific recognition of their rights. Throughout the plan, Indigenous communities are incorrectly framed as stakeholders, as opposed to rightsholders. While the Official Plan does indicate willingness to engage with this work, it does not give any clear directives on what kind of relationship the municipality seeks to develop with the rightsholding Indigenous communities, nor how it intends to develop this relationship.

Findings from Framework Application to Sables-Spanish Rivers Official Plan:

Sables-Spanish Rivers is a single-tier municipality in the Georgian Bay region. It is situated on Treaty 61 lands - also known as the Robinson-Huron treaty, which was signed in 1850. Communities in the area include Sault Ste. Marie, Kirkland Lake, and North Bay. The most recent Sables-Spanish Rivers Official Plan was released on October 1st, 2019.

Category	Indicator	Evaluation Inadequate (no mention) | Minimal | Moderate | Significant	Notes and Relevant Content from the Official Plan
Recognition	**Acknowledgment of Contemporary and Historical Indigenous land relationships**	**Moderate:** Specific mention of Indigenous communities by name, discussion of historical dynamics between Indigenous communities and settlers.	The OP specifically names the Serpent River First Nation and the Sagamok Anishnawbek First Nation in section 3.7.7 (Indigenous Interests).

			No discussion of the historical dynamics between Indigenous communities and settlers.
	Acknowledgment of Unique Rights Held by Indigenous Nations/Communities	**Inadequate:** No mention of the various rights held by Indigenous communities.	No mention.
	Acknowledgement of or reference to Indigenous communities' "unique relationship with land and its resources", as directed by PPS 2020	**Significant:** Discussions of local Indigenous cultures, land relationships, and land use practices that are relevant to land use planning in the area. Indigenous terminology used and explained where appropriate. Active involvement of local Indigenous communities in long-range land use planning practices.	In 'Coordination', re: land use planning decisions, mentions the Indigenous communities as stakeholders who will be cooperated with in land use practices that are relevant to land use practices (Section 2.14). Additionally, states that "the Council will consult with Indigenous people in the preparation of such plans." (Section 3.15.1.2 A) Mentions that council will work with the Serpent River First Nation and the Sagamok Anishnawbek First Nation to establish a protocol for consultation on the conservation of archaeological resources and cultural heritage landscapes. (Section 3.7.7)

Reconciliation	**Knowledge Sharing**	**<u>Significant:</u>** Evidence of including local/relevant Indigenous knowledge and jurisprudence in decision-making. Clear pathways for knowledge sharing between Indigenous and non-Indigenous communities.	In 'Indigenous Interests': OP mentions that Council will collaborate and coordinate land use planning matters with Indigenous communities to get relevant knowledge and establish a protocol for consultation on the conservation of archaeological resources and cultural heritage landscapes. (Section 3.7) Also mentions policies for integrated land use planning with other orders of government, agencies and Indigenous communities (Section 3.27).
	Cultural Protection(s) - Heritage and Archaeology	**Significant:** Heritage plan proactively identifies areas culturally significant for Indigenous communities, and involves expertise from Indigenous communities in the identification, assessment and decision-making stages. Protection and conservation of cultural landscapes promoted as an option.	Section 3.15 Cultural Heritage and Archaeological Resources and Section 2.14 Coordination of Land-Use Planning decisions successfully identifies areas that are culturally significant and provides for the identification, restoration, protection, maintenance, management, and enhancement of cultural heritage resources of local, provincial or federal significance or designation. (Examples: Water Wheel (Denvic Lake), Birch Lake Dam.). " Section 3.15.1.2 A. mentions that : The Committee will contribute to the establishment of management policies for the long-term protection and conservation of cultural heritage

			resources, particularly any heritage attributes that have been identified during the creation of a heritage resource inventory. This may include the preparation of a heritage master plan and an. archaeological master plan. Council will consult with Indigenous people in the preparation of such plans." The protection and conservation of cultural landscapes is promoted as an option and is said in the OP to be achieved through a co-operative and co-ordinated approach in the Official Plan May 28, 2020 Page 44 with senior level governments and Indigenous communities;
	Role of Indigenous Communities in Planning	**<u>Significant:</u>** Evidence that righsholding Indigenous communities are treated as collaborative partners in planning, this may be in the form of reference to their sovereignty, their right to self-determination, government-to-government cooperation, or relationship-building processes, etc.	Section 3.27.7 of the official plan mentions that Indigenous Interests Council in conjunction with area municipalities will collaborate and coordinate land use planning matters with indigenous communities and will consult with respect to the conservation of archaeological resources and cultural heritage landscapes. Council will work with the Serpent River First Nation and the Sagamok Anishnawbek First Nation to establish

			a protocol for consultation on the conservation of archaeological resources and cultural heritage.
	Relationship Building	**<u>Significant</u>:** Active relationship building between Indigenous and municipal governments, including knowledge-sharing, capacity building and conflict resolution. Can be facilitated through third party organisations. Evidence of long term relationship building, which is enshrined in culturally-relevant agreements (such as wampum belts).	Mentions that Council will consult with Indigenous people in the preparation of land use plans and actively participate in knowledge sharing and to participate through third party organisations on matters of economic development planning and programming with the La Cloche Manitoulin Business Association Corporation (LAMBAC) and regional stakeholders such as businesses, government, and the Manitoulin-Sudbury District Social Services Board (MSDSB), with respect to housing, education, organizations, and Indigenous communities. (Section 3.15.1.2 A) Evidence of long term relationship via mention of how Council "will " work with the Serpent River First Nation

			and the Sagamok Anishnawbek First Nation to establish a protocol for consultation on the conservation of archaeological resources and cultural heritage landscapes.
Willingness	**Initiative Displayed**	**Moderate:** Mix of directive and enabling language ("shall" intermingled with "should"/"encouraged") used while referring to municipal commitments to Indigenous communities.	Some directive language is used. Council mentioned they "will" with Indigenous people but only relating to the heritage act and archaeology in the preparation of such plans. No clear pathways for action to move forward. (Section 3.27.7)
	Process of Consultation	**Moderate:** Pre-development consultation with the appropriate rightsholding Indigenous communities. The OP recognizes specific roles and responsibilities of the various actors in the consultation process, and their authority.	Several mentions of need for consultation. However, OP only mentions that council will consult with the Serpent River First Nation and the Sagamok Anishnawbek First Nation in effort to "collaborate and coordinate land use planning matters with Indigenous communities". There is no specific direction on how to conduct this consultation, and at what stage, nor whether it extends to any other matters.

The Official Plan from Sables-Spanish Rivers includes evidence of their intention and willingness to incorporate Indigenous communities and interests into planning process. It also provides several directives for collaborating with Indigenous communities, and acknowledges their unique relationship with land and its resources. Sables-Spanish Rivers provided significant directives to developing and maintaining meaningful relationships between municipal and Indigenous bodies, insofar as it can be achieved via the planning process. The OP showed interest in engaging Indigenous communities through knowledge sharing, cultural and heritage protections, and relationship building processes. It showed moderate initiative and willingness to collaborate as partners with the Indigenous communities, and lacks mention of the distinct rights held by local Indigenous communities. The plan repeatedly uses directive language and mentions consultation with Indigenous communities, but makes no specific mention or (nor clear directives for) how to conduct the consultation process, nor at what stage.

CONCLUSION & RECOMMENDATIONS

Conclusion

This project has set out to evaluate the extent to which municipalities are responding to changes in the PPS via analysis of references made to Indigenous communities and their interests in OP documents. A key outcome of this has been the development of a model framework that can be used to evaluate municipal Official Plans, which can double as a reference guide for PPS implementation work.

The descriptive analysis undertaken indicates that, on balance, Indigenous interests, rights, and concerns have been increasingly included in municipal Official Plans over the course of the past 30 years. Though this is heartening on its face, it's evident that there is room for significant improvement across virtually all dimensions of municipal-Indigenous relationships, across every municipality in Ontario. As such, further work to ensure that the provisions of the 2020 PPS are taken seriously take on increased urgency. It's suggested that the new PPS stands to meaningfully alter the degree to which Indigenous communities are incorporated into planning decisions that impact their lives. The model framework provided - if used correctly by municipal planners as they go about implementing the 2020 PPS' directives - stands to contribute to this larger, ongoing project. Beyond this, we also offer the following recommendations, which have bearing on the activities of planners, municipalities, and the Provincial government:

Recommendations

Provincial- Municipal Relationships:

Official Plan Revisions:
Official Plans should be revised every five years, as mandated by the Planning Act, in order to ensure that the local governments are up to date with the Province's policy directives. During our research we came across several Official Plans which had not been revised for over a decade, and subsequently failed to capture changes not only from PPS 2020, but also PPS 2014. This is notable, as PPS 2014 was the first PPS that mentioned Indigenous interests in land use at all. This is indicative of a larger, ongoing implementation issue.

Municipal Capacity Building:
The Province should commit to educating municipalities (of all tiers) on how to incorporate the latest PPS update in a way that effectively captures its spirit and intent - this should be a coordinated effort, with technical support provided as needed.

Municipal - Indigenous Relationships:

Third-Party Spaces:
One of the overwhelming recommendations from our key informants has been to involve third-party facilitators in the processes of capacity building, knowledge-sharing and conflict resolution between municipal and Indigenous governments. The First Nation-Municipal Community

Economic Development Initiative, an initiative jointly led by the Federation of Canadian Municipalities and Council for the Advancement of Native Development Officers (CANDO) was frequently noted as an example of this. One informant suggested Shared Path Consultation Initiative would be a good candidate for the role of a third-party facilitator.

Sustained Relationships:
Municipal governments should ensure the longevity of their relationships with Indigenous communities. This could be achieved by enshrining relationships in commonly agreeable, culturally relevant agreements, which are revisited regularly. An example of this is the Ezhi-Wiijikiwendiyang (Friendship Accord) and wampum belt agreement between Hiawatha First Nation, Curve Lake First Nation, Peterborough County, the Township of Selwyn, the Township of Ontonabee South Monaghan, the Board of Peterborough, and the Kawartha Lakes Economic Development Corporation.

Capacity-Specific Engagements:
In cases when municipal or First Nation capacity hinders either party's ability to pursue extensive and formalized processes, provisions should be created for regular and informal 'check-ins' between municipal and Indigenous actors. This is essential for knowledge-sharing, and for determining the desired manner, extent of, and capacity for consultation work.

Collaborative Policymaking:
Rather than only consulting Indigenous communities reactively in cases of development and other projects deemed relevant by the municipality, rightsholders should be made a part of the policymaking process itself. This will ensure that policies are sensitive to and respond to community capacities, relationships, and needs.

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Appendices

Appendix 1:

List of Interview Questions:

1. What is your relationship with Shared Path?
2. What are some of the best municipal-Indigenous relationships that you have observed or know of?
3. How would you characterize the extent of indigenous engagement with land use planning processes in your community? How would you improve these processes?
4. How can municipalities improve and deepen consultation processes with rightsholders?
5. What do you believe is the bare minimum that municipalities should do in developing municipal-Indigenous relationships in land use planning?
6. Are there specific terms or concepts that you feel need to be used more widely in Official Plans or other land use planning documents?

Appendix 2

Table 1: Findings Summary Table: Overall

Percentage of OPs that Reference Indigenous Communities, Nations, Rights, Interests, etc.

Overall	%
203 / 443	45,8%

Tier	Overall	% of Group
Single Tier	89 / 172	51,7%
Upper Tier	24 / 30	80%
Lower Tier	24 / 241	9,90%

Designation	Overall	% of Group
Regional Municipality	4 / 6	66,60%
District Municipality	1 / 1	100%
County	23 / 24	95,80%
City	26 / 46	56,50%
Town	46 / 86	53,50%
Township	71 / 200	35,50%
Village	1 / 10	10,00%

Year of PPS Referenced	Overall	% of Group
2020	1 / 1	100%
2014	79 / 144	54,9%
2006	1 / 1	100%
2005	83 / 150	55,3%
1997	1 / 4	25,0%
1996	1 / 8	12,5%
Not Specified	34 / 106	32,1%
N/A - Website Down	3 / 29	10,3%

Table 2: Findings Summary Tables: Content (Structural) – Part 1

Distribution of Mentions of Indigenous Nations, Concerns, Issues etc. Across Common OP Topics/Sections

	Set	Vision/Purpose/Basis	Direction/Objectives	History	Cultural Heritage / Archaeology	Environment	Housing	Infrastructure
Overall	All Municipalities	7,90%	9,00%	8,40%	37,90%	7,90%	2,50%	0,50%
Tier	Single Tier - Overall	14,00%	11,60%	11,00%	43,00%	13,30%	4,60%	0,05%
	Single Tier - Positives Only	27,00%	22,50%	21,30%	83,10%	25,80%	9,00%	1,10%
	Upper Tier - Overall	6,7%	13,3%	10,0%	66,7%	6,7%	10,0%	0,0%
	Upper Tier - Positives Only	8,3%	16,7%	12,5%	83,3%	8,3%	12,5%	0,00%
	Lower Tier - Overall	3,7%	6,6%	6,2%	30,7%	4,1%	0,0%	0,4%
	Lower Tier - Positives Only	10,0%	17,8%	16,7%	82,2%	11,1%	0,0%	1,10%
Designation	Regional Municipality - Overall	0,0%	0,0%	16,7%	50,0%	0,0%	16,7%	0,0%
	Regional Municipality - Positives Only	0,0%	0,0%	25,0%	75,0%	0,0%	25,0%	0,0%
	District Municipality - Overall	100,0%	100,0%	0,0%	100,0%	0,0%	0,0%	0,0%
	District Municipality - Positives Only	100,0%	100,0%	0,0%	100,0%	0,0%	0,0%	0,0%
	County - Overall	12,5%	12,5%	16,7%	83,3%	8,3%	8,3%	0,0%
	County - Positives Only	13,0%	13,0%	17,4%	87,0%	8,7%	8,7%	0,0%
	City - Overall	8,7%	19,6%	21,7%	43,5%	10,9%	2,2%	2,2%
	City - Positives Only	15,4%	34,6%	38,5%	76,9%	19,2%	3,8%	3,8%
	Town - Overall	11,6%	8,1%	7,0%	45,3%	8,1%	2,3%	1,2%
	Town - Positives Only	21,7%	15,2%	13,0%	84,8%	15,2%	4,3%	2,2%
	Township - Overall	6,5%	7,5%	4,5%	30,5%	6,0%	2,0%	0,0%
	Township - Positives Only	18,3%	21,1%	12,7%	85,9%	16,9%	5,6%	0,0%
	Village - Overall	0,0%	10,0%	0,0%	10,0%	0,0%	0,0%	0,0%
	Village - Positives Only	0,0%	100,0%	0,0%	100,0%	0,0%	0,0%	0,0%
Year of PPS Referenced	2020 - Overall	0,0%	100,0%	100,0%	100,0%	0,0%	100,0%	0,0%
	2020 - Positives Only	0%	100%	100%	100%	0%	100%	0%
	2014 - Overall	8,3%	13,9%	7,6%	44,4%	13,9%	2,8%	0,7%
	2014 - Positives Only	15,2%	25,3%	13,9%	81,0%	25,3%	5,1%	1,3%
	2006 - Overall	0,0%	0,0%	0,0%	100,0%	0,0%	0,0%	0,0%
	2006 - Positives Only	0%	0%	0%	100%	0%	0%	0%
	2005 - Overall	9,33%	6,67%	12,67%	49,33%	7,33%	3,33%	0,00%
	2005 - Positives Only	16,9%	12,0%	22,9%	89,2%	13,3%	6,0%	0,0%
	1997 - Overall	0,0%	0,0%	0,0%	25,0%	0,0%	0,0%	0,0%
	1997 - Positives Only	0,0%	0,0%	0,0%	100,0%	0,0%	0,0%	0,0%

1996 - Overall	12,5%	12,5%	0,0%	0,0%	0,0%	0,0%	0,0%
1996 - Positives Only	100,0%	100,0%	0,0%	0,0%	0,0%	0,0%	0,0%
Not Specified - Overall	7,5%	7,5%	3,8%	23,6%	3,8%	0,9%	0,9%
Not Specified - Positives Only	23,5%	23,5%	11,8%	73,5%	11,8%	2,9%	2,9%
N/A - Website Down - Overall	0,0%	0,0%	6,9%	6,9%	0,0%	0,0%	0,0%
N/A - Website Down - Positives Only	0%	0%	67%	67%	0%	0%	0%

Table 2: Findings Summary Tables: Content (Structural) – Part 2

Distribution of Mentions of Indigenous Nations, Concerns, Issues etc. Across Common OP Topics/Sections

	Set	Planning Context	OP Review/ Monitoring	Economic Development	Crown Lands	Implementation	Consultation	Other
Overall	All Municipalities	7,20%	4,30%	6,10%	1,60%	9,70%	21,90%	10,20%
Tier	Single Tier - Overall	10,50%	4,00%	11,60%	3,50%	12,80%	25,00%	15,10%
	Single Tier - Positives Only	20,20%	7,90%	22,50%	6,70%	24,70%	48,30%	29,20%
	Upper Tier - Overall	16,7%	16,7%	10,0%	0,0%	23,3%	46,7%	10,0%
	Upper Tier - Positives Only	20,80%	20,80%	12,50%	0,00%	29,20%	58,30%	12,50%
	Lower Tier - Overall	3,7%	2,9%	1,7%	0,4%	5,8%	16,6%	6,6%
	Lower Tier - Positives Only	10,00%	7,80%	4,40%	1,10%	15,60%	44,40%	17,80%
Designation	Regional Municipality - Overall	16,7%	0,0%	0,0%	0,0%	33,3%	66,7%	0,0%
	Regional Municipality - Positives Only	25,0%	0,0%	0,0%	0,0%	50,0%	100,0%	0,0%
	District Municipality - Overall	0,0%	100,0%	0,0%	0,0%	100,0%	100,0%	0,0%
	District Municipality - Positives Only	0,0%	100,0%	0,0%	0,0%	100,0%	100,0%	0,0%
	County - Overall	29,2%	16,7%	12,5%	0,0%	20,8%	41,7%	12,5%
	County - Positives Only	30,4%	17,4%	13,0%	0,0%	21,7%	43,5%	13,0%
	City - Overall	10,9%	0,0%	2,2%	0,0%	17,4%	30,4%	15,2%
	City - Positives Only	19.2%%	0,0%	3,8%	0,0%	30,8%	53,8%	26,9%
	Town - Overall	7,0%	4,7%	7,0%	1,2%	9,3%	20,9%	4,7%
	Town - Positives Only	13,00%	8,70%	13,00%	2,20%	17,40%	39,10%	8,70%
	Township - Overall	4,0%	4,0%	6,0%	2,0%	7,0%	17,0%	9,5%
	Township - Positives Only	11,3%	11,3%	16,9%	5,6%	19,7%	47,9%	26,8%
	Village - Overall	0,0%	0,0%	0,0%	0,0%	0,0%	10,0%	0,0%
	Village - Positives Only	0,0%	0,0%	0,0%	0,0%	0,0%	100,0%	0,0%
Year of PPS Referenced	2020 - Overall	0,0%	0,0%	100,0%	0,0%	0,0%	0,0%	100,0%
	2020 - Positives Only	0%	0%	100%	0%	0%	0%	100%
	2014 - Overall	13,9%	4,2%	12,5%	2,8%	14,6%	23,6%	18,1%
	2014 - Positives Only	25,3%	7,6%	22,8%	5,1%	26,6%	43,0%	32,9%
	2006 - Overall	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
	2006 - Positives Only	0%	0%	0%	0%	0%	0%	0%
	2005 - Overall	5,33%	6,00%	4,00%	1,33%	10,67%	36,00%	7,33%
	2005 - Positives Only	9,6%	10,8%	7,2%	2,4%	19,3%	65,1%	13,3%
	1997 - Overall	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
	1997 - Positives Only	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
	1996 - Overall	12,5%	0,0%	0,0%	0,0%	12,5%	12,5%	0,0%
	1996 - Positives Only	100,0%	0,0%	0,0%	0,0%	100,0%	100,0%	0,0%
	Not Specified - Overall	2,8%	3,8%	1,9%	0,9%	4,7%	7,5%	5,7%

Not Specified - Positives Only	8,8%	11,8%	5,9%	2,9%	14,7%	23,5%	17,6%
N/A - Website Down - Overall	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	3,4%
N/A - Website Down - Positives Only	0%	0%	0%	0%	0%	0%	33%

Table 3: Findings Summary Tables: Content (Conceptual) – Part 1

Mention Types/Relevant Concepts within OPs

	Set	Recognition of Distinct Indigenous Interests	Recognition of Indigenous Rights	Mention of Specific Treaties/Negotiation Processes	Specifically Name Indigenous Communities	Mention of Pre-Application Consultation	Standalone Section(s) re: Indigenous Nations/Communities
Overall	All Municipalities	20,5%	8,8%	4,3%	16,7%	5,0%	6,8%
Tier	Single Tier - Overall	25,6%	10,5%	7,6%	20,3%	10,5%	8,7%
	Single Tier - Positives Only	49,4%	20,2%	14,6%	39,3%	20,2%	16,9%
	Upper Tier - Overall	40,0%	23,3%	6,7%	36,7%	3,3%	23,3%
	Upper Tier - Positives Only	50,0%	29,2%	8,3%	45,8%	4,2%	29,2%
	Lower Tier - Overall	14,5%	5,8%	1,7%	11,6%	1,2%	3,3%
	Lower Tier - Positives Only	38,9%	15,6%	4,4%	31,1%	3,3%	8,9%
Designation	Regional Municipality - Overall	16,7%	0,0%	0,0%	16,7%	0,0%	0,0%
	Regional Municipality - Positives Only	25,0%	0,0%	0,0%	25,0%	0,0%	0,0%
	District Municipality - Overall	100,0%	100,0%	0,0%	100,0%	0,0%	100,0%
	District Municipality - Positives Only	100%	100%	0%	100%	0%	100%
	County - Overall	45,8%	25,0%	8,3%	54,2%	8,3%	25,0%
	County - Positives Only	47,8%	26,1%	8,7%	56,5%	8,7%	26,1%
	City - Overall	28,3%	8,7%	6,5%	21,7%	4,3%	4,3%
	City - Positives Only	50,0%	15,4%	11,5%	38,5%	7,7%	7,7%
	Town - Overall	19,8%	9,3%	3,5%	15,1%	2,3%	5,8%
	Town - Positives Only	37,0%	17,4%	6,5%	28,3%	4,3%	10,9%
	Township - Overall	16,0%	6,0%	4,0%	13,5%	6,0%	6,0%
	Township - Positives Only	45,1%	16,9%	11,3%	38,0%	16,9%	16,9%
	Village - Overall	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
	Village - Positives Only	0%	0%	0%	0%	0%	0%
Year of PPS Referenced	2020 - Overall	100,0%	0,0%	0,0%	0,0%	0,0%	100,0%
	2020 - Positives Only	100%	0%	0%	0%	0%	100%
	2014 - Overall	31,9%	17,4%	9,7%	21,5%	8,3%	13,2%
	2014 - Positives Only	58,2%	31,6%	17,7%	39,2%	15,2%	24,1%
	2006 - Overall	0%	100%	0%	100%	0%	0%
	2006 - Positives Only	0%	100%	0%	100%	0%	0%
	2005 - Overall	16,0%	4,0%	2,7%	16,7%	4,0%	4,0%
	2005 - Positives Only	28,9%	7,2%	4,8%	30,1%	7,2%	7,2%

1997 - Overall	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
1997 - Positives Only	0%	0%	0%	0%	0%	0%
1996 - Overall	0,0%	0,0%	0,0%	12,5%	0,0%	0,0%
1996 - Positives Only	0%	0%	0%	100%	0%	0%
Not Specified - Overall	17,0%	6,6%	0,9%	13,2%	3,8%	2,8%
Not Specified - Positives Only	52,9%	20,6%	2,9%	41,2%	11,8%	8,8%
N/A - Website Down - Overall	6,9%	0,0%	0,0%	6,9%	0,0%	3,4%
N/A - Website Down - Positives Only	67%	0%	0%	67%	0%	33%

Table 3: Findings Summary Tables: Content (Conceptual) – Part 2

Mention Types/Relevant Concepts within OPs

	Set	Expressed Interest in Extended Collaboration or Relationship-Building Processes	Expressed Intent to Develop/Respect Non-Archaeological Consultation Protocols	Commitment Notification and/or Consultation re: Development/Planning Activities not Related to Archaeology	Acknowledgment of Indigenous Nations/Communities as 'Jurisdictions' or Governing Bodies	Mention of Indigenous Knowledges, Culture, or Traditions	Directive Language Tied to Commitments? (e.g. will/shall/must vs. may/should)
Overall	All Municipalities	12,2%	4,1%	5,6%	2,9%	5,9%	32,4%
Tier	Single Tier - Overall	18,0%	7,0%	9,9%	4,1%	8,7%	36,6%
	Single Tier - Positives Only	34,8%	13,5%	19,1%	7,9%	16,9%	70,8%
	Upper Tier - Overall	33,3%	10,0%	6,7%	6,7%	13,3%	63,3%
	Upper Tier - Positives Only	41,7%	12,5%	8,3%	8,3%	16,7%	79,2%
	Lower Tier - Overall	5,4%	1,2%	2,5%	1,7%	2,9%	26,1%
	Lower Tier - Positives Only	14,4%	3,3%	6,7%	4,4%	7,8%	70,0%
Designation	Regional Municipality - Overall	33,3%	16,7%	16,7%	0,0%	16,7%	66,7%
	Regional Municipality - Positives Only	50,0%	25,0%	25,0%	0,0%	25,0%	100,0%
	District Municipality - Overall	100,0%	100,0%	0,0%	0,0%	100,0%	100,0%
	District Municipality - Positives Only	100%	100%	0%	0%	100%	100%
	County - Overall	33,3%	4,2%	8,3%	12,5%	8,3%	75,0%
	County - Positives Only	34,8%	4,3%	8,7%	13,0%	8,7%	78,3%
	City - Overall	21,7%	6,5%	4,3%	4,3%	15,2%	52,2%
	City - Positives Only	38,5%	11,5%	7,7%	7,7%	26,9%	92,3%
	Town - Overall	10,5%	2,3%	3,5%	3,5%	3,5%	36,6%
	Town - Positives Only	19,6%	4,3%	6,5%	6,5%	6,5%	68,5%
	Township - Overall	8,5%	3,5%	6,0%	2,0%	2,5%	23,8%
	Township - Positives Only	23,9%	9,9%	16,9%	5,6%	7,0%	66,9%
	Village - Overall	0,0%	0,0%	0,0%	0,0%	0,0%	10,0%
	Village - Positives Only	0%	0%	0%	0%	0%	100%
Year of PPS Referenced	2020 - Overall	100,0%	0,0%	0,0%	0,0%	0,0%	100,0%
	2020 - Positives Only	100%	0%	0%	0%	0%	100%
	2014 - Overall	19,4%	6,9%	7,6%	2,8%	4,9%	41,7%
	2014 - Positives Only	35,4%	12,7%	13,9%	5,1%	8,9%	75,9%
	2006 - Overall	100%	0%	0%	0%	0%	100%
	2006 - Positives Only	100%	0%	0%	0%	0%	100%
	2005 - Overall	7,3%	2,0%	6,7%	1,3%	8,0%	35,3%
	2005 - Positives Only	13,3%	3,6%	12,0%	2,4%	14,5%	63,9%

1997 - Overall	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
1997 - Positives Only	0%	0%	0%	0%	0%	0%
1996 - Overall	0,0%	0,0%	0,0%	12,5%	0,0%	12,5%
1996 - Positives Only	0%	0%	0%	100%	0%	100%
Not Specified - Overall	10,4%	3,8%	2,8%	4,7%	5,7%	23,1%
Not Specified - Positives Only	32,4%	11,8%	8,8%	14,7%	17,6%	72,1%
N/A - Website Down - Overall	6,9%	3,4%	3,4%	3,4%	3,4%	10,3%
N/A - Website Down - Positives Only	67%	33%	33%	33%	33%	100%