Parks Canada Parcs Canada

Cultural Resource Management Policy

Canada

NAME: Cultural Resource Management Policy

APPROVED BY: _____ [ALAN LATOURELLE]

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RESCINDED DOCUMENT: This policy replaces the *Cultural Resource Management Policy* (1994).

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Introduction to Parks Canada's Policies

Parks Canada is privileged in its role as the steward of outstanding cultural and natural treasures that represent the richness and diversity of Canada. Our policies are essential to ensuring that commonly understood principles and practices are applied in the management of our protected heritage places. They set the high-level corporate requirements and accountabilities to guide senior managers in exercising the various authorities assigned to their positions.

For Parks Canada team members, our policies promote an integrated approach to the delivery of Parks Canada's mandate in their day-to-day work, by outlining clear objectives and consistent approaches to decision making across diverse program and functional areas.

Policies alone do not guarantee success. To be effective, they need the commitment of staff at all levels of the organization, and they are supplemented by policy instruments such as guides and directives, where required, to provide implementation guidance.

I am pleased to approve a renewed *Cultural Resource Management Policy* for Parks Canada. I encourage all Parks Canada team members to become familiar with its contents and to ensure that its requirements are effectively applied at our protected heritage places so that cultural resources are conserved and their heritage value is shared for the understanding, appreciation and enjoyment of present and future generations.

Alan Latourelle

Chief Executive Officer
Parks Canada Agency

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1. EFFECTIVE DATE

This policy takes effect on January 1, 2013.

2. PURPOSE

The *Cultural Resource Management (CRM) Policy* provides policy requirements for managing the wide range of cultural resources administered by Parks Canada.

3. CONTEXT

Cultural resources reinforce a sense of connection to Canada and to Parks Canada's protected heritage places and the stories they tell. The *CRM Policy* supports an integrated and holistic approach to the management of cultural resources. It applies to conserving and sharing the heritage value of the national treasures that are under the stewardship of Parks Canada. The policy also supports the Agency objective of enhancing visitation, facilitating authentic visitor experiences and connecting hearts and minds to a stronger, deeper understanding of the very essence of Canada.

Effective cultural resource management is based on knowing the heritage value of cultural resources and taking this value into consideration in all actions that can affect them. It operates at two levels: it applies to an entire national historic site as well as to the individual cultural resources associated with a protected heritage place, including landscapes and landscape features, buildings and engineering works, archaeological sites, and archaeological and historical objects.

Parks Canada is one of the principal cultural resource management organizations in Canada and is the Government of Canada lead for matters and programs related to built and archaeological heritage. Parks Canada contributes to international heritage conservation through its leadership in conservation and presentation and its participation in international conventions, such as the World Heritage Convention, and in international organizations dedicated to the conservation of cultural heritage such as the International Centre for the Study of the Preservation and Restoration of Cultural Property (ICCROM).

Together with other federal policies, such as the *Treasury Board Policy on Management of Real Property*, this policy identifies at a broad level how Parks Canada manages the cultural resources under its stewardship. Implementation guidance can be found in directives and guidelines developed by Parks Canada to support this policy, and in additional conservation tools such as the *Standards and Guidelines for the Conservation of Historic Places in Canada*. All Parks Canada's policy instruments that pre-date this policy should be interpreted in light of the requirements identified in this document.

4. APPLICATION

a) The *CRM Policy* applies to:
- protected heritage places administered by Parks Canada;
- cultural resources under Parks Canada's administration;
- Parks Canada programs, plans, activities, contracts, licenses, concessions and agreements that may affect cultural resources or the sharing of their heritage value.

b) The *CRM Policy* does not apply to:
- human remains managed under Parks Canada Directive 2.3.1: *Human Remains, Cemeteries, and Burial Grounds*.
- resources that are determined, upon evaluation, not to be cultural resources. These resources will be managed under other policies, such as the management of materiel or real property and Parks Canada Asset Management Directive and Standards.

c) This policy must be applied in conjunction with specific provisions dealing with cultural resources in land claims and other agreements for the establishment and management of protected heritage places.

d) Parks Canada encourages the use of this policy by other owners of national historic sites or places of heritage value. It is a basis of any potential financial support and cultural resource management advice that the Agency provides to others.

5. KEY DEFINITIONS

Character-defining elements (éléments caractéristiques): the materials, forms, location, spatial configurations, uses and cultural associations or meanings that embody the heritage value of a cultural resource, which must be retained to preserve that value.

Commemorative integrity (intégrité commémorative): refers to the condition or state of a national historic site when the site has retained the heritage value for which it was designated. This is the desired state for a national historic site (see Appendix 2 for more detail). A national historic site possesses commemorative integrity when:

- the resources directly related to the reasons for designation as a national historic site are not impaired or under threat;
- the reasons for designation as a national historic site are effectively communicated to the public;
- the site's heritage values (including those not related to the reasons for designation as a national historic site) are respected in all decisions and actions affecting the site.

Commemorative Integrity Statement (énoncé d'intégrité commémorative): describes what is meant by commemorative integrity for a particular national historic site. It describes the place, the reason for its designation, its cultural resources and their heritage value. It includes objectives for their conservation and for sharing their heritage value with the public in ways that reflects the richness and importance of the national historic site. It also provides a baseline for planning, managing, operating, reporting and taking remedial action.

Condition monitoring (surveillance de l'état): the systematic and regular inspection or measurement of the condition of the materials and elements of a cultural resource to determine their state, behaviour, performance and any deterioration over time. The key focus is to ensure the long-term conservation of the resource and its heritage value.

Conservation (conservation): all actions or processes aimed at safeguarding the character-defining elements of a cultural resource to retain its heritage value. This may involve preservation, rehabilitation, restoration or a combination of these conservation approaches.

Cultural resource (ressource culturelle): a human work, an object, or a place that is determined, on the basis of its heritage value, to be directly associated with an important aspect or aspects of human history and culture. The heritage value of a cultural resource is embodied in tangible and/or intangible character-defining elements. Cultural resources associated with Parks Canada protected heritage places are divided into two categories:

- cultural resources of national historic significance (formerly known as Level I cultural resources): cultural resources that have a direct relationship with the reasons for designation of a national historic site;
- cultural resources of other heritage value (formerly known as Level II cultural resources): cultural resources that do not have a direct relationship with the reasons for designation of a national historic site but that relate to important aspects of the human history or cultural significance of a Parks Canada protected heritage place.

Cultural Resource Values Statement (énoncé des valeurs des ressources culturelles): identifies the heritage values of a protected heritage place (excluding national historic sites) and the cultural resources of the place that relate to these values. The CRVS is designed to help make strategic decisions about identifying cultural resources and setting priorities for their management.

Heritage value (valeur patrimoniale): the aesthetic, historic, scientific, cultural, social or spiritual importance or significance for past, present or future generations. The heritage value of a cultural resource is embodied in its character-defining elements.

Intervention (intervention): any action, project or activity, including a change in use, that may affect a cultural resource or its heritage value. It includes a project as defined under Parks Canada's *Project Management Standard*.

Maintenance (entretien): routine, cyclical, non-destructive actions necessary to ensure the preservation of a cultural resource (including landscape features) and slow its deterioration. It includes periodic inspection, cleaning, minor repair and refinishing operations, and replacement of damaged or deteriorated elements that are impractical to save.

National Historic Site (lieu historique national): place of national historic significance designated by the Government of Canada on the advice of the Historic Sites and Monuments Board of Canada (HSMBC).

Protected heritage place (lieu patrimonial protégé): federal land, submerged land and water, as well as buildings and structures administered by the Parks Canada Agency (PCA) including: National Historic Sites of Canada administered by PCA and historic canals, National Parks of Canada and National Park Reserves of Canada, National Marine Conservation Areas of Canada and National Marine Conservation Areas Reserves of Canada, and any national urban parks or other places of heritage value identified in the future.

6. POLICY STATEMENT

6.1 Objective

To ensure that cultural resources administered by Parks Canada are conserved and their heritage value is shared for the understanding, appreciation and enjoyment of present and future generations.

6.2 CRM Principles

The following principles must be applied together in all cultural resource management activities:

- Understanding Heritage Value: knowing why a cultural resource is significant, and what character-defining elements must be conserved. This involves understanding the history of the cultural resource, its current condition and the threats to its condition, and its past and current importance to Canadians.
- Sustainable Conservation: focusing CRM practice on achievable results that will ensure the conservation of cultural resources that convey the heritage value of Parks Canada's protected heritage places over the long-term, based on recognized conservation standards and taking into consideration the financial and human resources available.
- Benefit to Canadians: safeguarding cultural resources for present and future generations, and sharing their heritage value in ways that inspire discovery and a sense of personal connection with Parks Canada's protected heritage places.

6.3 Expected Results of the CRM Policy

- Identification of cultural resources and their character-defining elements that convey the heritage value of Parks Canada's protected heritage places.
- Sustainable conservation of cultural resources, based on priorities and recognized conservation standards.
- Effective integration of cultural resource management, visitor experience and external relations programs and initiatives, as well as of other Agency priorities and programs.
- Consistent approach to CRM practices, based on common processes and clear accountabilities.
- Sharing heritage value of protected heritage places in support of Agency objectives for visitor experience and public appreciation and understanding.

7. POLICY REQUIREMENTS

This section outlines the requirements for the management of cultural resources at Parks Canada. It includes requirements related to their identification through evaluation, as well as those related to setting priorities, conservation, assessment of impacts of interventions, monitoring and keeping records and documentation. The last section outlines requirements related to sharing the heritage value of cultural resources.

7.1 Identifying Cultural Resources through Evaluation

7.1.1 General Requirements

a) To be considered a cultural resource, a resource must go through an evaluation process. The evaluation process will determine if a resource (or group of resources) has sufficient heritage value to be considered a cultural resource (see Parks Canada's guide on *Identifying Cultural Resources through Evaluation*).

b) To have sufficient heritage value, a resource (or group of resources) must relate directly to an important aspect of the human history or cultural significance of a Parks Canada protected heritage place.

c) The evaluation process must include the following:
- sufficient information about the resources being evaluated, such as their history, current condition, and past and current importance to Canadians;
- criteria to determine their significance;
- participation of individuals inside and/or outside Parks Canada who represent different perspectives about the heritage value of the resources being evaluated. The size and composition of the cultural resource evaluation team must be scaled to the resources to be evaluated.

d) The result of the evaluation must be recorded and approved by the responsible senior manager. Identified cultural resources must be included in an inventory of cultural resources and, for buildings and engineering works, registered in the asset management system.

e) A cultural resource status may only be given once a formal evaluation has taken place. An evaluation must take place before taking any decision or action that could adversely affect a resource.

f) A resource that does not have a direct association with a protected heritage place may, in exceptional cases, be identified as a cultural resource by senior management, on the recommendation of an evaluation team.

g) Structures administered by Parks Canada that are designated under other federal designation programs for cultural heritage, including federal heritage buildings, heritage lighthouses and heritage railway stations, are considered to be cultural resources and must be managed under this policy.

7.1.2 Identifying Cultural Resources in a National Historic Site

The identification of cultural resources of national historic significance is a key requirement of the CRM Policy, as Parks Canada's mandate gives direction to conserve and share the heritage value of nationally significant examples of Canada's cultural heritage and to support the commemorative integrity of national historic sites for present and future generations. Commemorative integrity is supported by the application of cultural resource management principles in a national historic site.

a) Known resources located within a national historic site must be evaluated to determine if they are cultural resources. The heritage value and character-defining elements of identified cultural resources must be documented or referenced in a Commemorative Integrity Statement (CIS).

b) Commemorative Integrity Statements must be prepared for national historic sites administered by Parks Canada. The purpose of the CIS is to identify what constitutes the commemorative integrity of a national historic site, in particular its heritage value and cultural resources (those of national historic significance and those of other heritage value), and to help managers set priorities for their management.

c) National historic sites are designated by the Minister responsible for Parks Canada and the Historic Sites and Monuments Board of Canada (HSMBC), on the advice of the HSMBC. The advice specifies the national historic significance (reason for designation) and extent of the site. The HSMBC advice to the Minister, and any subsequent Ministerial designation, may specify which resources within a designated national historic site are of national historic significance. Parks Canada must respect this direction in management actions affecting such sites.

d) When a designation is not specific with respect to the national historic significance of resources at a national historic site, Parks Canada must apply the reasons for designation to determine which resources are to be considered of national historic significance. Parks Canada must also identify cultural resources that do not have a direct relationship with the reasons for designation of a national historic site but that may relate to other heritage values of the site.

e) If a Commemorative Integrity Statement has not been completed or if a potential cultural resource (such as an in-situ archaeological resource) was not evaluated as part of a CIS, an evaluation must be completed before taking any decision or action that could have an adverse effect on this resource.

7.1.3 Identifying Cultural Resources in other Parks Canada Protected Heritage Places

Parks Canada's other protected heritage places contain important cultural resources that testify to the human relationships with these places over millenia and, in particular to the history and culture of Aboriginal peoples. They constitute important aspects of these places and have the potential to engage Canadians in the understanding of these places and of the stories of Canada.

a) Evaluation of resources to determine if they are cultural resources or not, must be performed when there is a requirement to make informed management decisions, in particular when:
   - planning an intervention or an activity that could adversely affect a resource that may have heritage value (see section 7.2.3 on assessing impacts of interventions to cultural resources);
   - there is accidental discovery of resources during an intervention;
   - there is evidence that a resource that may have heritage value may be adversely affected by human or natural processes.

b) The evaluation of resources may be done proactively at the scale of the whole protected heritage place to identify cultural resources that contribute to its heritage value, if a Field Unit Superintendent determines that this approach would help in meeting objectives for cultural resource management or other Parks Canada priorities, such as cooperative management agreements with Aboriginal peoples, visitor experience, ecological integrity or ecologically sustainable use. The results of this evaluation must be documented through a Cultural Resource Values Statement and will include the following:
   - definition of the overall heritage value of the place, related to its human history;
   - identification of the cultural resources that convey this heritage value and assist with the selective identification of cultural resources in the future;
   - reference to the values and cultural resources of a national historic site, if one is included in the boundaries of the protected heritage place;
   - essential information to support the sustainable conservation of these cultural resources by identifying their heritage value and character-defining elements.

7.2 Managing Cultural Resources

The management of cultural resources ranges from day-to-day decision-making to strategic investment of financial and human resources in conservation. Everyone can make an effective contribution to cultural resource management. Team members work together in a multi-disciplinary and inter-disciplinary fashion to understand the heritage value of cultural resources, ensure their conservation over the long term, and share their value with others.

7.2.1 Setting Priorities for Management

a) Parks Canada must set priorities for the management of and investment in cultural resources to ensure that the cultural resources that convey the heritage value of Parks Canada's protected heritage places are conserved for the benefit and appreciation of present and future generations.
   - In a **national historic site**, primary consideration must be given to cultural resources of national historic significance that are essential to ensuring its commemorative integrity. These cultural resources are a priority for the Agency. Criteria outlined in paragraph b and Appendix 1 will be used to identify management priorities.
   - In **other protected heritage places administered by Parks Canada**, management priorities must be established for the place, as required under paragraph b and according to the criteria outlined in Appendix 1. These priorities will determine which cultural resources will be maintained, will receive conservation treatment, will be monitored regularly and will be included in the visitor experience and external relations programs and activities of the place.

b) Priorities for management of and investment in cultural resources must be defined through the planning processes for protected heritage places. The work of CRM functions and disciplines must be aligned with these priorities (see Appendix 1 for more detail). Priorities must take into account:
   - Parks Canada's corporate priorities;
   - the heritage value of the cultural resource;
   - its physical condition and threats to its condition;
   - its ability to convey national significance and the stories of Canada, or to convey the heritage value of the protected heritage place related to its human history (potential for visitor experience and external relations activities);
   - its importance to Aboriginal peoples, local communities and stakeholders.

c) Cultural resources for which the Agency does not have sufficient human and financial resources to invest in their conservation must be treated in a respectful manner. Best efforts must be undertaken to conserve their heritage value, for example by involving others in their management or by finding an alternative use.

d) When a cultural resource has several heritage designations (see section 7.1.1 g), the heritage values related to all these designations must be considered in the management of the cultural resource.

e) Parks Canada must focus its management efforts on cultural resources under its administration. It must not assume responsibilities for cultural resources beyond its administration, unless required by legal or contractual obligations.

f) If a proposed intervention outside a Parks Canada protected heritage place is likely to adversely affect cultural resources and the heritage value of the place, the Field Unit Superintendent will determine Parks Canada's interests and the nature of any involvement with the proponent and decision maker. This may involve participation in a provincial or municipal planning or review process.

g) Parks Canada will regularly review its holdings of cultural resources, and may acquire cultural resources that help realize the mandate and achieve the Strategic Outcome and Vision, or dispose of those that do not meet program needs.
   - The acquisition of buildings and disposal of federal heritage buildings must be undertaken in accordance with the Treasury Board *Policy on Management of Real Property*.
   - Acquisition and disposal of objects that are cultural resources must be made in accordance with Parks Canada Management Directive on *Acquisition and Disposal of Historical and Archaeological Objects and Reproductions*.

7.2.2 Conserving Cultural Resources

Cultural resources are irreplaceable and connect us with the places, persons and events that have shaped our history and our country. Conservation efforts focus on the heritage value and character-defining elements of a cultural resource. The application of recognized conservation standards, along with the practice of regular maintenance, are essential to ensuring the preservation of Parks Canada's cultural resources for the benefit, appreciation, and enjoyment of present and future generations.

The requirements of this section apply to cultural resources in national historic sites, national parks, national marine conservation areas and any national urban parks or other places of heritage value identified in the future.

a) Overall planning for all protected heritage places must take a proactive approach that anticipates the opportunities and challenges associated with the conservation of cultural resources over the long-term, taking into account management priorities. This proactive approach includes the development of maintenance strategies, mitigation of threats, and the anticipation of major changes to the cultural resource, such as its use or physical alterations.

b) The conservation of heritage value must be a primary consideration in any intervention directed at a cultural resource.

c) Conservation activities for archaeological and historical objects must be consistent with Parks Canada's guidelines on conservation of objects. Conservation activities for other cultural resources must be guided by the *Standards and Guidelines for the Conservation of Historic Places in Canada (S&G)* (see Appendix 3).

d) Parks Canada will encourage the consideration of various uses of cultural resources at all of its protected heritage places, in ways that will support public enjoyment and long-term conservation. A change in use that may affect the heritage value of a cultural resource – from the use of objects for visitor experience to the adaptive re-use of buildings – must be subject to an assessment of the impact of the intervention.

7.2.3 Assessing Impacts of Interventions to Cultural Resources

Cultural resource management includes accommodating changes to places and cultural resources, as the needs of protected heritage places evolve over time. The goal of assessing impacts of interventions to cultural resources is to determine how the heritage value and character-defining elements of a cultural resource or of a protected heritage place will be affected by a proposed intervention (see definition on p. 4), and how any adverse effects might be mitigated.

The requirements of this section apply to cultural resources in national historic sites, national parks, national marine conservation areas and any national urban parks or other places of heritage value identified in the future.

a) The impact of any proposed intervention that may adversely affect the heritage value of a cultural resource at any protected heritage place must be assessed early, at its conceptual or planning stage, in order to minimize its impact on the heritage value. The assessment must be refined as necessary throughout subsequent stages of development of the intervention as more detail becomes available.

b) The level of effort and detail of the assessment must reflect the potential severity and complexity of the likely adverse effects and the heritage value of the affected cultural resources (see guidelines on assessing impacts of interventions to cultural resources).
   - In a **national historic site**, more effort and detail must be provided in assessing impacts of intervention to cultural resources of national historic significance that are essential to ensuring the commemorative integrity of the site.
   - In **other protected heritage places**, more effort and detail must be provided in assessing impacts of interventions to cultural resources that are identified as management priorities for the field unit.

c) The requirements of the assessment may be met by using existing processes where possible, to avoid duplication of effort. These may include a Federal Heritage Buildings Review Office Review of Intervention, Environmental Impact Analysis, Initial Integrated Assessment (*Project Management Standard*), or Recreational Activity and Special Event Assessment.

d) All assessments must include the following (see Parks Canada's guidelines on assessing impacts of interventions to cultural resources):
   - application of the three principles of the *CRM Policy*: understanding heritage value, sustainable conservation and benefit to Canadians;
   - consideration of the heritage value and character-defining elements of the affected cultural resource(s);
   - consideration of the potential for the proposed intervention to adversely affect resources that may have heritage value but that have not yet been identified or evaluated, such as in-situ archaeological resources;
   - sound conservation practice (see section 7.2.2);
   - mitigation and monitoring strategies, when necessary.

e) The assessment must consider the impact on the value of the overall place as well as on its individual elements, as the value of the whole place may be greater than the value of its individual elements.

f) The results of an assessment of the impact of an intervention must:
   - inform management decisions;
   - be documented to record the considerations, rationale for the decision, and any mitigation and monitoring of mitigation actions.

7.2.4 Monitoring the Condition of Cultural Resources

Monitoring the condition of cultural resources provides Parks Canada with the necessary information to make informed decisions in support of Parks Canada objectives to maintain or improve the condition of cultural resources, to assess the outcomes of management actions and investments against heritage conservation objectives, and to communicate the state of cultural resources to decision-makers and Canadians.

The requirements of this section apply to cultural resources in national historic sites, national parks, national marine conservation areas and any national urban parks or other places of heritage value identified in the future.

a) Monitoring must occur in protected heritage places and cultural resource repositories and focus on the following priorities.
   - In **national historic sites**, monitoring must focus on:
     - cultural resources of national historic significance;
     - the critical character-defining elements that ensure the commemorative integrity of national historic sites;
     - specific considerations such as management priorities, threats to cultural resources and effectiveness of mitigation actions.

   - In **other protected heritage places**, monitoring must focus on:
     - site-specific considerations, such as management priorities, threats to cultural resources and effectiveness of mitigation actions.

b) Monitoring must be guided by a standard approach for Parks Canada following nationally established guidelines (see Parks Canada's *Guidelines for Monitoring the Condition of Cultural Resources*), according to the following typology: landscapes and landscape features, buildings and engineering works, archaeological sites, historical and archaeological objects.

c) Monitoring results will inform management decision-making, maintenance and management planning, and provide data for corporate reporting.

d) Information on the condition of cultural resources, including threats to their condition, will be maintained and reviewed on a regular basis.

e) Condition monitoring for cultural resources should be integrated, where possible, with relevant asset inspection and other monitoring programs to ensure coordination and efficiency.

7.2.5 Records and Documentation

Cultural resource management requires knowledge and understanding of cultural resources, of their history, current condition, and past and current importance to Canadians. Records and documentation preserve the information necessary for effective decision-making, for audit purposes, and for sharing the heritage value of cultural resources to Canadians.

The requirements of this section apply to cultural resources in national historic sites, national parks, national marine conservation areas and any national urban parks or other places of heritage value identified in the future.

a) Cultural resources must be recorded and documented to preserve a public record, particularly in cases of potential loss due to human or natural forces and when long-term stabilization or in-situ preservation are not possible.

b) Records and documentation essential to the understanding of cultural resources and of the key decisions about them must be maintained, accessible, and up-to-date.

c) Records and documentation must be identified and managed in accordance with Treasury Board's *Directive on Recordkeeping*, which requires that government institutions manage information resources of business value by applying established recordkeeping practices, mechanisms and tools.

d) Sensitive information must be managed according to Parks Canada's guidelines on managing sensitive information and related government legislation and policy, including the Treasury Board's *Policy on Governmental Security* and the *Access to Information* and *Privacy Acts*.

7.3 Sharing Heritage Value

Cultural resources help connect people to the history and stories of Canada in powerful ways. Sharing the heritage value of these resources is an essential element of effective cultural resource management. As part of the visitor experience, Parks Canada shares the heritage value of a national historic site as a whole, linking the stories of the site with the broader stories of Canada. Parks Canada also recognizes that individual cultural resources are important tangible elements that evoke the authentic stories of a protected heritage place and enhance the experience for visitors.

a) At **national historic sites** administered by Parks Canada, Parks Canada is directed, as part of its mandate, to provide opportunities for Canadians to experience, understand and appreciate the national historic significance of the site (see Appendix 2 for more detail).
   - As part of the visitor experience, Parks Canada will maximize opportunities for cultural resources to inspire discovery and a sense of personal connection to the national historic site and, by extension, a stronger understanding of the essence of Canada.
   - Where there are multiple reasons for national historic significance, some reasons may be emphasized over others.
   - Stories and experiences not related to the national historic significance of a national historic site may also be offered.

b) At **other protected heritage places**, Parks Canada should consider opportunities to share the heritage value of cultural resources when this supports Agency objectives for visitor experience and public appreciation and understanding.

c) In sharing heritage value at all its protected heritage places and providing opportunities for high-quality visitor experiences and outreach activities, Parks Canada must recognize the interests, needs and expectations of the public. This includes:
   - acknowledging that there are many different ways to enjoy and appreciate a protected heritage place;
   - providing opportunities that consider a wide variety of visitor interests and preferences throughout the entire visitor experience cycle;
   - working with others, where possible and appropriate, in presenting and interpreting heritage value, especially where stories or cultural resources resonate strongly with a particular community or group.

d) Sharing the heritage value of cultural resources must be done with integrity, clarity and balance.
   - It will be based on the best available knowledge of these resources and the history of the place.
   - It will be clear about the extent of conservation work, reconstructions and reproductions that support the visitor experience.
   - It will involve, where possible and appropriate, the inclusion of multiple voices, perspectives and interpretations.

8. ACCOUNTABILITIES

Everyone can make an effective contribution to cultural resource management. Specific accountabilities for senior managers are defined below.

a) The **Vice-President, Heritage Conservation and Commemoration Directorate (HCCD)**, is accountable for:
- providing overall national policy and related tools, including best practices, capacity building tools, functional leadership and constituting a community of practice in cultural resource management;
- interpreting policy and providing policy advice and relevant expertise and support to field units to meet their cultural resource management accountabilities, such as archaeological and historical research, collection management, curatorial services, and conservation services;
- providing strategic advice to senior management on cultural resource management issues, in particular when this establishes precedent or sets policy;
- resolving issues when consensus cannot be reached in the application of the *CRM Policy*;
- ensuring, in consultation with other senior managers, that cultural resource management considerations are aligned with other Parks Canada objectives;
- monitoring the effectiveness of, and compliance with, the *CRM Policy,* through the Agency's internal audit program.

b) **Field Unit Superintendents** are accountable for ensuring that:
- the requirements of the *CRM Policy* are applied to all cultural resources and protected heritage places under their management, including national historic sites, national parks, national marine conservation areas and national urban parks;
- all planning and reporting programs include consideration of cultural resource management issues and set priorities for the management of and investment in cultural resources at protected heritage places consistent with the *CRM Policy*;
- relevant staff are consulted and involved in cultural resource management issues at as early a stage as possible;
- staff have the critical knowledge in CRM necessary to accomplish their work;
- a member of the management team has the lead for CRM issues.

c) The **Vice-President, External Relations and Visitor Experience Directorate (ERVED)**, is accountable for:
- ensuring that the requirements of the *CRM Policy* are applied to visitor experience and external relations activities and programs at Parks Canada's protected heritage places;
- monitoring and reporting on the *CRM Policy* requirements related to visitor experience and external relations, in particular the sharing of heritage value at national historic sites.

d) The **Vice-President, Protected Areas Establishment and Conservation Directorate**, is accountable for:
- ensuring that the requirements of the *CRM Policy* are applied to policies and programs in national parks, national marine conservation areas and national urban parks.

e) The **Chief Administrative Officer (CAO)** is accountable for:
- ensuring that CRM requirements are integrated into all planning and reporting areas, including investment planning.

9. CONSEQUENCES

If an issue is raised regarding compliance, a Field Unit Superintendent or Director may be requested by the Vice-President, Heritage Conservation and Commemoration Directorate (HCCD), to provide a rationale for the decision and, if appropriate;
- take corrective actions and report back on the results achieved, and/or
- ensure training to meet Parks Canada objectives is provided.

10. AUDIT AND EVALUATION

The Office of Internal Audit and Evaluation will periodically conduct audits and evaluations of key aspects of this policy.

11. RELATED REFERENCES

Consult the intranet section on Cultural Resource Management for the most up-to-date versions of related policies, directives and guides that support the *CRM Policy*.

12. INQUIRIES

Further information pertaining to the *CRM Policy* can be obtained by contacting the Heritage Conservation Branch, Heritage Conservation and Commemoration Directorate.

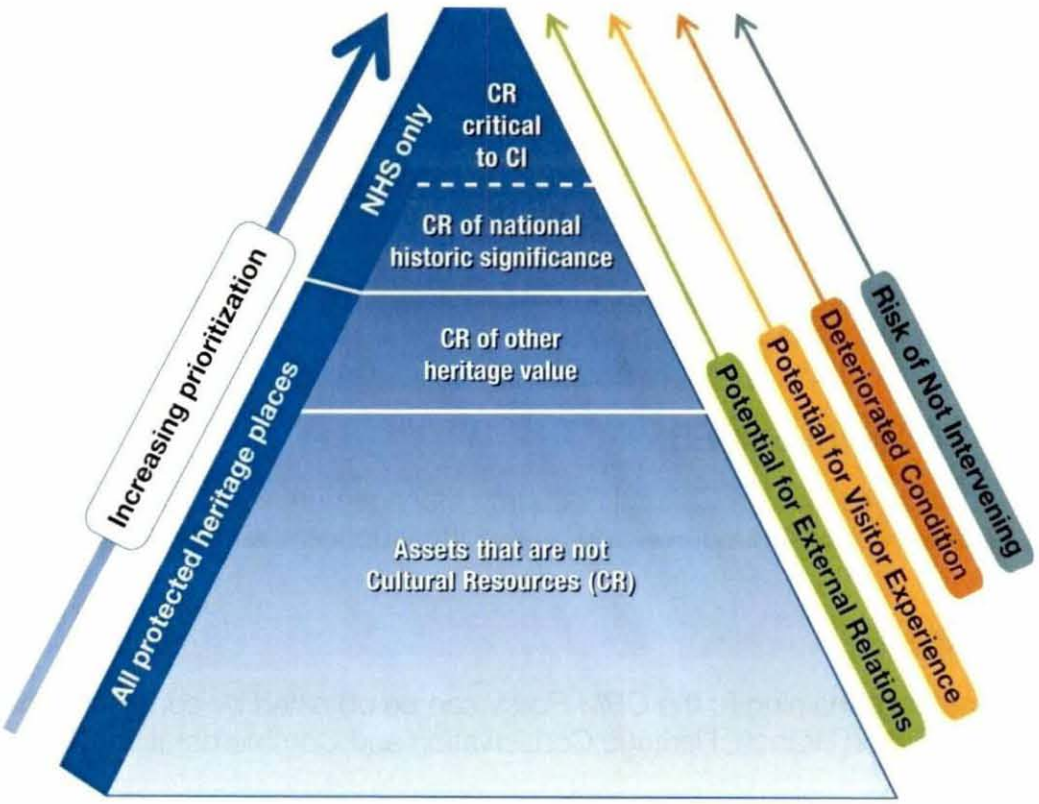
Cultural Resource Management Policy

Appendix 1: Setting Priorities for the Management of Cultural Resources at Protected Heritage Places

This appendix provides the key considerations related to cultural resource management to help Parks Canada managers determine priorities for investment of human and financial resources in cultural resources administered by Parks Canada. These criteria focus on cultural resource management considerations only. They must be integrated with the larger Parks Canada Agency Investment Prioritization framework. The graph below provides an illustration of how these criteria work together to define priorities. A guide on how to apply the CRM criteria to set management priorities for cultural resources is available at [link].

Key Agency-wide Considerations in Decision-making

- Achievement of Parks Canada's Vision, Strategic Outcome and Performance Management Framework
- Legal and policy considerations
- Visitor and staff safety
- Financial implications



Heritage Value of the Resource

- Cultural resources of national historic significance
    - Priority to cultural resources of national historic significance critical to ensuring the commemorative integrity of a NHS (conservation and communication aspects)

- Cultural resources of other heritage value
    - Aboriginal cultural resource
    - Scarcity of the resource (are there similar resources elsewhere, on the site or across Canada?)
    - Recognition of the resource by other authorities (FHBRO, provinces and municipalities)

Risk of Not Intervening

- Deterioration of the condition of the resource
- Negative impact on Parks Canada's image and visitor experience
- Negative impact on third parties (environmental impact, loss of revenue, damage to one or more adjoining properties, etc.)

Condition of the Resource

- Extent of the resource's deterioration from a commemorative integrity perspective
- Physical condition of the resource from an asset management perspective
- Rapidity of resource deterioration from an asset management perspective
- Level of intervention required to safeguard the resource: capacity to easily rectify the deterioration

Potential for Visitor Experience

- Importance of the resource to visitor experience (contributes to a high level of visitor satisfaction, is used by the public, is a component of the visitor experience)
- Capacity of the resource to convey the reasons for designation as a NHS
- Physical accessibility of the resource (visitors have easy visual and physical contact with the resource)
- Public attachment to the cultural resource (resource not necessarily part of an interpretation tour, but the public may be attached to it or attribute significance to it)

- Alignment of the resource with the level of the park/site and the nature of its role in the Brand Architecture hierarchy

Potential for External Relations

- Potential of the resource to build meaningful relationships, to create economic partnerships, increase programming or enhance employment opportunities
- Potential for collaboration with Aboriginal communities
- Importance of the resource to the community (economic or social importance, tourism)
- Potential to increase awareness of Parks Canada or to generate significant public, stakeholder or partner support and engagement

Cultural Resource Management Policy

Appendix 2: Commemorative Integrity Objectives for National Historic Sites

Background:

The purpose of this appendix is to clarify the application of the concept of commemorative integrity in light of the *Cultural Resource Management Policy* (2012). Guidance is provided on each of the three elements of commemorative integrity.

Parks Canada is directed, as part of its mandate, to ensure the commemorative integrity of national historic sites. Commemorative integrity refers to the desired condition or state of a national historic site. It helps ensure that cultural resources that convey the heritage value of Parks Canada's protected heritage places will be conserved and passed on to future generations and that Canadians will know why the site and its resources are important.

The heritage value of a national historic site is articulated in a Commemorative Integrity Statement (CIS). This document provides essential information on the heritage value and cultural resources of a national historic site. It is a baseline reference for management planning, setting priorities, sharing heritage value and assessing the impact of interventions.

Application of Commemorative Integrity to National Historic Sites:

The application of commemorative integrity requires that three elements be addressed in the management of a national historic site:

1) **The resources directly related to the reasons for designation as a national historic site are not impaired or under threat.**

   This element refers to the protection of cultural resources of national historic significance, which is an important element of Parks Canada's mandate. The priority is to conserve cultural resources that are critical to the commemorative integrity of a national historic site over the long term and to avoid or mitigate significant threats from natural processes or human action or inaction, using sound heritage conservation practices.

   Using the CIS and the Historic Sites and Monuments Board of Canada reasons for designation, managers must also be certain that the identified cultural resources of national historic significance have a direct relationship with the reasons for designation.

   Recognizing that sufficient human and financial resources may not always be available to conserve all resources, managers may need to define priorities in order

to focus conservation efforts on those resources that are essential for ensuring the commemorative integrity of the site over the long term, using the CIS as a guide.

2) **The reasons for designation as a national historic site are effectively communicated to the public.**

Parks Canada is committed to providing opportunities for Canadians to experience, understand and appreciate the national historic significance of the national historic sites it administers. Effective communication means looking at innovative ways to inspire discovery of the place and to share its heritage value with the public.

The CIS allows for the telling of multiple stories and multiple perspectives. Together, they constitute part of the "stories of Canada." The CIS contains "messages" directly related to the reasons for designation as well as "messages" related to other values of the site. These messages are intended to guide and inspire innovative opportunities to share the heritage value of a national historic site and its cultural resources. They are part of the considerations that inform visitor experience, outreach and engagement, which may include themes and activities not addressed in the CIS.

The level and methods of presentation may vary from site to site. There is also flexibility regarding the relative weighting of messages directly related to the reasons for designation and of messages related to other values of the site. Where there are multiple reasons for designation, it is acceptable to emphasize one over the others, when one resonates strongly with visitor interests, stakeholders, or corporate priorities. There is also flexibility regarding the selection of messages related to other values of the site. Where there are multiple messages, it is acceptable to emphasize one over the others.

3) **The site's heritage values (including those not related to the reasons for designation as a national historic site) are respected in all decisions and actions affecting the site.**

This statement encourages the consideration of the multiple heritage values of a national historic site in an integrated way, consistent with Parks Canada's mandate. It includes the heritage value related to cultural resources that are not of national historic significance, as well as values related to natural heritage, for example ecosystem features and species at risk.

For cultural resources of other heritage value, the expectation is that site managers will consider and take the values of these resources into account in decisions and actions that could affect them. Recognizing that human and financial resources are limited, managers will need to consider management priorities for cultural resources (see Appendix 1 on setting priorities). Natural heritage elements will be managed according to applicable legislation, policy and guidelines.

Cultural Resource Management Policy

Appendix 3: Conservation Standards from the Standards and Guidelines for the Conservation of Historic Places in Canada

Parks Canada has adopted the *Standards and Guidelines for the Conservation of Historic Places in Canada* (S&G) as a key tool to support the sustainable conservation of cultural resources at protected heritage places it administers. This appendix lists the 14 conservation standards from the S&G, to provide additional information for the sections of the *CRM Policy* pertaining to conservation and impact of interventions. The entire document is available at: http://www.historicplaces.ca/en/pages/standards-normes.aspx

The Standards are not presented in a hierarchical order. All standards for any given type of treatment must be considered and applied, where appropriate, in any conservation project.

General Standards for Preservation, Rehabilitation and Restoration

1. Conserve the heritage value of an historic place. Do not remove, replace or substantially alter its intact or repairable character-defining elements. Do not move a part of an historic place if its current location is a character-defining element.

2. Conserve changes to an historic place that, over time, have become character-defining elements in their own right.

3. Conserve heritage value by adopting an approach calling for minimal intervention.

4. Recognize each historic place as a physical record of its time, place and use. Do not create a false sense of historical development by adding elements from other historic places or other properties, or combining features of the same property that never coexisted.

5. Find a use for an historic place that requires minimal or no change to its character-defining elements.

6. Protect and, if necessary, stabilize an historic place until any subsequent intervention is undertaken. Protect and preserve archaeological resources in place. Where there is potential for disturbing archaeological resources, take mitigation measures to limit damage and loss of information.

7. Evaluate the existing condition of character-defining elements to determine the appropriate intervention needed. Use the gentlest means possible for any intervention. Respect heritage value when undertaking an intervention.

8. Maintain character-defining elements on an ongoing basis. Repair character-defining elements by reinforcing their materials using recognized conservation methods. Replace in kind any extensively deteriorated or missing parts of character-defining elements, where there are surviving prototypes.

9. Make any intervention needed to preserve character-defining elements physically and visually compatible with the historic place and identifiable on close inspection. Document any intervention for future reference.

Additional Standards Relating to Rehabilitation

10. Repair rather than replace character-defining elements. Where character-defining elements are too severely deteriorated to repair, and where sufficient physical evidence exists, replace them with new elements that match the forms, materials and detailing of sound versions of the same elements. Where there is insufficient physical evidence, make the form, material and detailing of the new elements compatible with the character of the historic place.

11. Conserve the heritage value and character-defining elements when creating any new additions to an historic place or any related new construction. Make the new work physically and visually compatible with, subordinate to and distinguishable from the historic place.

12. Create any new additions or related new construction so that the essential form and integrity of an historic place will not be impaired if the new work is removed in the future.

Additional Standards Relating to Restoration

13. Repair rather than replace character-defining elements from the restoration period. Where character-defining elements are too severely deteriorated to repair and where sufficient physical evidence exists, replace them with new elements that match the forms, materials and detailing of sound versions of the same elements.

14. Replace missing features from the restoration period with new features whose forms, materials and detailing are based on sufficient physical, documentary and/or oral evidence.