
ASSOCIATION OF PROFESSIONAL ARCHAEOLOGISTS

Box 101, McMaster University P.O., Hamilton, Ontario L8S 1C0

NEWSLETTER, VOLUME 4 NUMBER 1, 1993

CALL FOR NOMINATIONS APA EXECUTIVE, 1993-1995

Its time again for the APA membership to elect a new Executive. The positions of President, Vice-President, Secretary, Treasurer, and 3 Directors positions all must be filled. Any APA member in good standing can be nominated and run for the Executive. If you would like to help out the APA and join the Executive, please send your nomination to Alison Ariss, c/o P.O. Box 493, Port Hope, Ont. L1A 3Z4. Please indicate the position you wish to run for. Nominations close at the end of September, the election will be held in October, and the successful candidates will be presented at the APA meeting in November. Please see the nomination form enclosed in this newsletter for further information.

PRESIDENT'S REPORT

On July 7, 1993, together with APA Secretary Dr. Bill Fitzgerald, I attended an Ontario Archaeological Society Executive meeting and presented a case for joining the efforts of both organizations on issues of mutual interest. It is a great pleasure to re-

port that there was a unanimous consensus in the meeting for the APA and OAS to work together and a formal liaison was established between the President of both groups. I am hopeful that real progress can be made on issues of archaeological concern.

A recent successful venture by the APA was a formal presentation on the importance of archaeology to the Sewell Commission, and Provincial Task Force looking into revising Land Use Planning in Ontario. Director Bud Parker presented our case so well that the Commission recommended him for an award. It seems Bud came in second but the voice of archaeological concern was heard (see later in this newsletter for Bud's report).

In late June, a member of the Michigan Archaeological Society reported to the APA on the activities of an alleged cross-border artifact shopper from Michigan. The APA is in the process of investigating this charge and working with MAS and Canada Customs to cut short such unwelcome visits and improve our trade deficit! This is an issue of great importance to archaeologists and we hope APA members will offer their support.

Little more than a year ago, the President

and Vice-President of APA met with MCTR senior staff member Allen Tyyska to express APA concerns with the direction of self-regulation, among other issues. MCTR is now directly involved with the OAS strategic planning committee discussing self-regulation without contacting the APA. The most recent statement by this committee (see Arch Notes 93-3) is that the OAS is the only organization with the "breadth" and "prestige" to take on self-regulation. If MCTR agrees with this statement then it appears that the APA must, once again, fight to make its legitimacy seen. We are already a self-regulating organization, we have been in existence for five years, and we serve the professional community of Ontario. It is a mystery why MCTR sees an amateur and volunteer organization as the appropriate vehicle for "self-regulation" - whatever that may be. I am asking all APA members to express their concern to MCTR staff that discussions on self-regulation can not proceed without involving the professional community. The OAS does not represent Ontario's professionals and has never suggested that it does. This is why the APA was created. The two organizations can work in concert. PLEASE WRITE OR CALL MCTR STAFF AND LET THEM KNOW WHAT YOU THINK AND WHY.

On other fronts, the APA recently formed a committee to examine and make suggestions for a fee schedule for Ontario archaeologists involved with consulting. This schedule will provide a suggested range for services. There are serious concerns that business competition may be resulting in less than professional standards of field work and reporting. If the APA membership is agreeable, such a schedule may be recommended to all consulting archaeologists in Ontario. Hopefully,

the end result of such a measure will be selection of archaeologists based on quality of work rather than simply cost. This is an important and necessary step for archaeology in Canada.

In May of this year, while visiting Southern Methodist University for my dissertation defense, I met with Dr. Fred Wendorf, President-Elect of SOPA and discussed joint endeavours of APA and SOPA. Dr. Wendorf was quite enthusiastic in offering the assistance of SOPA to APA as a sister-society. Some members of the APA may not be aware that APA is modelled on the example of SOPA.

The officers of the APA are continuing to carry out their assigned duties, responding to member requests and grievances, making representations to various government and development agencies, and generally working for your interests. Anything you can do to assist this work is always appreciated. Of course, the APA's fall election for Executive officers is one good way of helping out the APA.

Finally, I would like to mention our Special Achievement Award. last year, the award recipients were Chris Ellis and Neal Ferris for their volume *The Prehistory of Southern Ontario to AD 1650*. If you have a candidate in mind for this year's award please send or give your nomination to any member of the APA Executive and we will put the name of names forward to a selection committee. Also established for the first time this year is a cash award for best refereed publication of a Canadian university student at the Master's level. Again, send your nominations for the selection committee.

I'm looking forward to seeing as many APA members as possible at our upcoming second Annual Symposium, November 20th, 1993. Chaired by Dr. Bill Fitzgerald (details to be announced), this symposium will provide the opportunity for members to get acquainted and hear of some of the research being carried out by APA members. An afternoon set of topical papers and panel discussion is also planned. So, we'll see you there.

Lawrence Jackson, President
Submitted July, 1993

ADVOCACY ISSUES

Discussion Paper. Improving Planning for Ontario's Natural Resources. Ministry of Natural Resources. December 1992.

The above noted document was reviewed in January. Its focus is on future planning amendments to existing policies and procedures at MNR. The document follows a four-tier approach, with the following main headings or themes: Decision-Making; Fairness; Integration; and, Ecosystem Integrity. MNR would like public input to suggestions presented in the discussion paper along these four themes. Since the main crux of the paper regards natural resources, archaeology is an issue that may not be readily applied to the many 'motherhood' statements in the document [Another discussion paper from MNR regarding Provincial Parks was reviewed by the author last year (*Provincial Parks Policy*, APA Newsletter, Vol. 3(2):4-5). The provincial parks document addresses cultural heritage concerns in an exemplary manner.] A letter outlining archaeological concerns will be sent to MNR in response to their request for input.

The planning paper from MNR is concerned primarily with natural resources. Cultural resources are only mentioned twice (in passing) in the document, in reference to some policy principles made by David Crombie in 1990 (pp. 18). One issue which may have fallen through the cracks in the MNR planning discussion is the potential impact aggregate extraction has on archaeological resources. Aggregate extraction (pits and quarries) licenses are issued by MNR through the Aggregate Resources Act, 1989. As part of an aggregate extraction license application, proponents must submit to MNR a detailed site plan. Among 20 features required to be on the site plan are: "any significant natural and man made features". This requirement is found throughout the Aggregate Resources Act, in regard to site plans (ie. Class A licenses: Chapter 23, Section 8.1.j). The implications for cultural heritage resources are obvious. Inventories of significant cultural heritage ("man made") features should be made by the proponent/applicant. To my knowledge, such inventories are not done except when the aggregate pit/quarry proposal goes through an environmental assessment, or when cultural heritage assessments are required by municipalities as part of rezoning applications (ie. Region of Waterloo).

There is high potential for destroying non-renewable known and unknown archaeological resources in the process of aggregate extraction in Ontario. This issue is of great concern to archaeologists, built heritage consultants and Native communities. Currently, the Ministry of Transportation conducts archaeological assessments for proposed wayside pits. This practice should be applied to all aggregate extraction license applications for lands not previously stripped

of topsoil. In Waterloo Region, such assessments are done routinely by those who wish to rezone lands to permit aggregate extraction. The cost of the assessment, and any subsequent mitigation, is borne by the landowner/proponent.

Current provincial legislation which protects known and unknown archaeological resources is found in the Planning Act, the Environmental Assessment Act, the Environmental Protection Act, and in the proposed new Ontario Heritage Act, among others. MNR could take the initiative and either: 1) enforce the regulation for aggregate extraction license applicants to provide an inventory of significant man made features; or, 2) circulate aggregate extraction applications (site plans) to other ministries (ie. Culture, Tourism & Recreation, Cultural Programs Branch), who would review the plans and possibly attach conditions to them, requiring full archaeological assessment.

Our society needs aggregate for industry, construction and maintenance of existing infrastructures. As more and more aggregate extraction pits and quarries are established, then more and more fragile, non-renewable cultural resources are potentially destroyed, including unmarked aboriginal burials. Archaeologists (and First Nations people) have concerns regarding MNR planning policy when it involves any impact on known and unknown archaeological resources.

Bud Parker

Ontario Cemeteries Act Update

The new Cemeteries Act has passed through

all legislative hurdles, and copies of the new act can be obtained from MCCR, or the government bookstore in Toronto. Despite concern expressed by APA regarding certain aspects of the new act, the legislation was passed without any amendments which would alleviate possible future problems for the proper archaeological investigation of unmarked burials. The proposed new Heritage Act, which has yet to be passed (and has some potential problems of its own), is supposed to be the jurisdictional vehicle used to protect unknown/unmarked burials (ie. prehistoric) in the future. Unfortunately, since the new Ontario Heritage Act is not yet law, then the new Cemeteries Act may be used as the legislative tool for unmarked burials in the near future. APA vice-president, Phil Woodley has voiced our concerns to MCCR regarding the new Cemeteries Act (see Cemeteries Act, APA Newsletter, Vol 3(2):2-4, 1992). However, since the Cemeteries Act is now law, our concerns may have to met by convincing MCCR to "interpret" certain portions of the Act to ensure the proper study and protection of archaeological resources (ie. human remains and associated features and artifacts), when they are encountered through consulting or research activities.

Bud Parker

The Sewell Commission On the Future of Land Use Planning in Ontario

APA earlier this year commented on the draft report of the Sewell Commission. This report presents ways in which the provincial government can delegate current provincial policies over to municipal governments. The

expression "streamlining the process" for clearance of development proposals (ie. subdivisions), has implications for both unknown archaeological resources, and the archaeological consulting industry. Currently, the Ministry of Culture, Tourism & Recreation (MCTR), through its Archaeology & Heritage Planning Unit of the Cultural Programs Branch, reviews draft plans sent to them by the Ministry of Municipal Affairs or delegated municipalities. MCTR may then flag certain draft plans for archaeological assessment and study conditions. Currently, MMA does not send MCTR development files from all municipalities in the province.

The following is the presentation made to the Sewell Commission:

Dear Commissioners Sewell, Penfold, and Vigod:

Thank you for the opportunity to present our views and concerns regarding the above noted draft report. At this time we congratulate the commission for presenting a concise, comprehensive document, that obviously represents a great deal of effort.

The Association of Professional Archaeologists consists of a growing membership representing all aspects of archaeological work in the province. We represent archaeologists involved in academic research, planning, government ministries, and the consulting industry. To our members, archaeology is a heritage concern that is extremely important, not just as a livelihood issue, but because the archaeological resources of the province are vital as heritage for the whole public, and these resources must be managed and protected in the best way possible.

After reviewing the draft report, we feel that several matters involving archaeological resources should be addressed:

1) Under "Proposed Provincial Policy Statements", archaeology falls under category "B. Community Development and Infrastructure Policies". Although by definition archaeological resources are considered to be "cultural heritage resources" (number 11, pp 27), in the draft report archaeological resources have their own policy (number 13, pp 27):

Areas of known archaeological sites and areas of archaeological potential will be identified. On lands containing significant archaeological heritage, development will not be permitted where, by its nature, the resource must be preserved on site to ensure its heritage integrity. In other cases, development may be permitted if the site is studied and significant archaeological heritage is catalogued, analyzed, and removed by licensed archaeologists prior to development.

We have important questions regarding this policy: a) who determines "potential"?; b) what are the criteria for "potential" and "significant archaeological heritage"?; c) after "potential" is determined, what steps (ie. archaeological surveys) are required to assess lands that have moderate to high potential?; and, d) who funds these studies, whether they are potential determinations, inventories, assessments, analyses, cataloguing, or removal (ie. excavation) of artifacts?

2) Under "the Provincial Role" section, the Proposed Interministerial Planning Committee (IPC) is structured to include deputies of the Ministry of Culture, Tourism and Rec-

reaction only when MCTR has an "interest" (pp. 35) in planning. Why is MCTR not always included with the other ministries who make up the core IPC structure, when it is obvious that cultural heritage resource management is a very important concern in planning?

3) Regarding "Aboriginal Issues", the draft report makes the statement that, in planning:

problems can arise as a result of circumstances... (such as)... In a municipality... (where)... development occurs on lands in which Aboriginals have an interest, such as a burial site or other sacred place (pp. 43).

Although the APA does not speak for any Aboriginal group, we feel that the commission should be aware of some important issues regarding current Aboriginal groups, and Aboriginal archaeological sites. For instance, some Aboriginals consider all archaeological sites (not just burials) culturally affiliated with past or present Native groups to be sacred. The implications of this are: a) Aboriginals could have an "interest" in all lands which have potential for Aboriginal-affiliated archaeological sites. (In Ontario there has been approximately 12,000 years of Aboriginal occupation.); and, b) the potential for Aboriginal-affiliated archaeological sites in Ontario's undeveloped lands is extremely high, given that the current data base of registered archaeological sites lists over 10,000 known sites, and Ministry archaeologists estimate that this number represents less than 10% of the total sites in existence. Of the known archaeological sites, the vast majority are Aboriginal in affiliation.

How does the commission propose to ad-

dress the potential "interest" of Aboriginals who may label all Aboriginal-affiliated archaeological sites (and existing artifacts) as "sacred"? Careful planning procedures for the management of known and potential archaeological resources of both Euro-Canadian and Aboriginal affiliation is crucial to resolving this issue.

4) "The Municipal Role" is a large section in the draft report, and as such it presents some proposals that are of concern to us.

a) We support the proposal for upper-tier municipal governments to develop official plans, under certain guidelines and policies issued by the province. Under these plans, the municipalities would then be responsible for lot creation approval (ie. new subdivisions). On page 47 of the draft report it is stated that the "broad" plans of the upper-tier municipalities must adhere to certain requirements set by the province. The first of these requirements is to "interpret provincial goals and policies into a regional context". We believe that "interpret" as a term has an inherent weakness, and we fear that municipalities could 'interpret' archaeological studies as frivolous or unnecessary, based on their "regional context". Some municipalities do not have any special interest groups (ie. Archaeology Societies, etc.), and therefore could not rely upon "regional contexts" to be defined by their own residents in regard to cultural heritage.

b) Still on page 47, it is proposed that once the basic plan is in place, "issues of a more local nature" will be required to be addressed by the upper-tier municipality. This requirement includes heritage concerns. What are the criteria, standards and/or procedures set by the province to assist the municipal

planners with cultural heritage issues? It is not now a requirement for most municipal planners to be familiar with cultural heritage resource management, let alone archaeological resource protection, so how will these municipal employees manage cultural heritage resources once the plans are in place?

c) Under the subsection "Plan Making" (pp 54), municipal plans are supposed to be "consistent" with provincial policy. The municipal planning process is also supposed to "include a review of alternatives regarding growth, settlement patterns and infrastructures and the effects of those alternatives on the natural, social, cultural and economic environments" (pp 55). For cultural issues, particularly archaeology, properly trained reviewers need to be used as is seen in existing municipalities with so-called 'archaeological master plans' in place.

d) Under the subheading "Content" (of new municipal plans) (pp 56), it is proposed that archaeological resources, as part of cultural resources, will be addressed and have policies concerning them created. We insist that the municipal policies on archaeology must be consistent with provincial policies, and not be poor interpretations.

e) Under the subheading, "Implementation" (of municipal plans) (pp 62), the draft report outlines proposals to protect against impacts to natural environments (pp 63). The draft report proposes that applications by developers must contain Environmental Impact Statements (EIS) if there is potential for such negative impacts. We believe that it would be consistent to consider cultural heritage resources (including built heritage and archaeological resources) as part of the environment protected by EIS reports. This type

of environmental assessment policy already exists in most policies in federal and provincial agencies and legislation (A pertinent document has been released by the Ministry of the Environment and the Ministry of Culture and Communications: "Guideline for Preparing the Cultural Heritage Resource Component of Environment Assessments" - October 1992.) The EIS reports would have to be reviewed by qualified approval personnel, not untrained municipal planning boards, or municipal councillors.

In summary, we at the APA believe that archaeological resource protection through proper planning is important to the whole public. Excellent archaeological planning is currently conducted, albeit sporadically, across the province. For example the Region of Waterloo has an excellent archaeological master plan, where an upper-tier based archaeologist reviews all new plans (zone changes, severances, subdivisions, municipal works). Using potential modelling, the archaeologist decides which plans should be archaeologically assessed. The developers operating in the Region of Waterloo pay for all archaeological studies which are required for clearance. As an example of what lies out there, Figure 2 shows a segment of the Cambridge area with all archaeological sites discovered through the requirements of the Waterloo Region's archaeological master plan as of 1988. Note that most of these sites are Aboriginal in affiliation, and include unmarked burials. These important cultural heritage resources would not have been identified or studied at all, were it not for the region's archaeological management policies, since few known archaeological sites were registered for this area prior to the required archaeological assessment field surveys. Since 1988, approximately 50 addi-

tional archaeological sites have been documented in this area.

If other municipalities do not follow the lead of Waterloo or other similarly cultural heritage-minded regions, then the number of archaeological sites unknowingly destroyed or inadequately studied, will certainly continue. Remember that less than 10% of all archaeological sites are known, and that the vast majority of them are Aboriginal in affiliation.

We recommend: a) placing cultural heritage resources under the EIS policy concerning proposed developments, as in the Environmental Assessment policies already in federal and provincial legislation; b) that funding should be provided to municipalities to develop archaeological plans into existing or new official plans (ie. like Waterloo Region); c) cultural heritage management policies should be written by the ministry responsible (Culture, Tourism and Recreation - Heritage Policy Branch and Cultural Operations and Field Services Branch), and these policies must be adhered to by the official plans ("interpretation" of policies into a regional context cannot compromise heritage resources); and, c) that provincial planning policy reflect that archaeological sites are part of the environment, and are non-renewable, and as such they must be protected by either trained, knowledgeable individuals at the municipal level (ie. planners), or by provincial agencies already in place (ie. Plans Review Unit of MCTR). We certainly do not want to see cultural heritage managed by people who may have a tendency to push heritage concerns aside in the interests of pleasing powerful forces such as developers, or superiors in their own municipality.

Thank you for allowing us to present our concerns.

L.R. Bud Parker

OPINIONS AND VIEWPOINTS

Wellington County/City of Guelph Landfill Site Selection: A Case of Not-In-My- Backyard

On January 11, 1993, the Guelph City council voted to reject the recommendations of a consultant's report which selected a proposed new landfill site in Nichol Township. Guelph and Wellington County have spend about 4 million over the past decade to reach this point. Although the County council had approved the consultant's report on January 5th, citizens coalitions lobbied successfully to convince city council that the recommended landfill site (known as N-4) was environmentally unsound.

As part of its field studies of four potential landfill site locations in the county, the consultant's work included a preliminary archaeological assessment (Stages 1 and 2). All four potential landfill sites were surveyed in the spring of 1991, resulting in the identification of over 20 archaeological sites, which included isolated artifacts (diagnostics), prehistoric campsites, and historic farmsteads. As well, built heritage was inventoried in the vicinity of all four potential landfill locations.

The frequencies of the inventoried cultural heritage for all four potential landfill sites was compared, and the N-4 site was considered the least desirable to be developed as a landfill, because it had the most cultural

resources. However, based on other studies (ie. hydrogeology), N-4 was chosen as the preferred landfill site.

On December 30, 1992, a press conference was held at N-4, by a contingent of traditional Native chiefs from Six Nations Reserve. Chief Wendall Froman (Oneida) informed the press and the invited guests that the N-4 lands contained "ancient Native burials". At the January 5th county council meeting Chief Froman reiterated this claim, then read a statement from a local amateur archaeologist which implied that prehistoric burials were probably located on the N-4 lands. When a county councillor asked Chief Froman if he had any physical evidence of prehistoric burials at N-4, the chief retorted, "Don't you take my word for it?"

According to the archaeological evidence discovered on N-4 in 1991, no indications of human interments were found. No Late Woodland sites are known to be nearby, and the prehistoric artifacts found at N-4 are typical of small hunting camps, of the Paleo-Indian, Archaic and Initial Woodland periods. However, from media coverage and other sources, the public is informed (sic) that prehistoric First Nations peoples are probably buried at N-4, based on oral tradition, and from statements from an amateur archaeologist. The not-in-my-backyard forces used the First Nations representatives and the amateur archaeologist as pawns in their fight against the proposed landfill site.

One important issue that Chief Froman presented during his speeches at council meetings, was the lack of communication between the landfill study proponents and First Nations governments. The Chief complained that his people were not informed of the pro-

posed landfill study until December of 1992. Should archaeologists (consultants and researchers) consult First Nations groups prior to all archaeological projects (assessments, research excavations, surveys, etc.)? Which Native groups should we consult (ie. band council, traditional chiefs, Native museums, etc.)? In Ontario, consultants could send a copy of all their "Contract Information Forms" to First Nations offices before projects begin, but again, to which Native group(s) do they send them? Chief Froman insists that Natives should be informed if their ancestral remains are threatened by development. The entire Western Hemisphere has seen over 12,000 years of Native occupation. Any modern development has the potential to disturb Native archaeological sites. Why doesn't Chief Froman fight against developments in other areas (ie. urban sprawl)? What will Chief Froman or the other Native groups do if they are informed of all proposed development? Dialogue between legitimate First Nations governments and the archaeological community should be initiated on more than a case by case basis. With the issues of Native self government, and burial/artifact repatriation in the news lately, the archaeological community may soon have to address the concerns of people such as Chief Froman.

In the meantime, the City of Guelph is still in need of a new landfill site. Since the County of Wellington voted to accept N-4, and the City of Guelph rejected it, funding for a new study may be a problem. It is unlikely that the county will commit funding for a another landfill site selection study in the near future.

Submitted by Bud Parker

TREASURER'S NOTE

This is a report of accounts receivable and payable for the period from November 1991 to October 1992. The 1992-1993 report will be submitted at the APA's annual general meeting, November 20th, in Hamilton.

Accounts Receivable:

Transfer of funds from CIBC bank accounts held by previous administration, January 1992

4682.79

Memberships - 533.81
Service Charge Refund - 228.00
Bank Interest - 63.86

Total Receivable - 5508.46

Accounts Payable:

OHF Task Force - 1628.20
Phone Charges - 745.89
Postage (Regular) - 80.28
Postage (Advocacy) - 109.63
Postage (AGM) - 89.88
Brochures - 86.53
Stationary - 203.82
Photocopy - 76.82
Newsletter - 137.43
Travel - 161.95
Bank Cheques - 30.48
Bank Service Charges - 4.95
AGM Dinner Deposit - 300.00

Total Payable - 3655.86

Balance on Hand, Oct. 31, 1992: 1852.60

Editor's Note:

The following article by James Fitting on the ethics and economics of consulting archaeology was published in 1984 in *Ethics and Values in Archaeology* (edited by Ernestene Green), pp. 117-122. The Free Press. New York. While close to 10 years out of date, and describing the American Experience, the message in this article finds a familiar home within the current consulting world of Ontario, and has been provided here for reader's interest. If APA newsletter readers are not familiar with this publication, you should check it out. Again, while the articles are a decade old, the issues, such as professionalization, site significance and site selection, are still around, and are nowhere near being resolved in Ontario or elsewhere.

Economics and Archaeology

James E. Fitting

THE MAJOR ETHICAL ISSUE in archaeology today, in this author's opinion, is not resource protection, adequacy of survey and mitigation models, or standards for practitioners, but rather cost, with all of its attendant institutional and personal traumas. All other issues revolve around the professional's need to perform a virtually limitless task - the identification, preservation, and interpretation of cultural resources - with a finite pool of dollars.

Clients, who are in a buyer's market, are free to use, and abuse, the confusion of the archaeological community to their own ends. Witness the example of the geotechnical engineer who recently dissolved his internal archaeological capability with the comment, "If I want archaeology done, I can

subcontract; if I get three bids, inevitably one will be half the price of the others and far less than we could afford ourselves."

This author has long been an advocate of client interests in archaeological contract work. When one takes a contract, one is morally and ethically obligated to serve the interests of the client. On the other hand, most clients are out to get the contractor and do everything in their power to put the contractor out of business. This is a fact of the marketplace. Clients are also in business and are faced with their own ethical problems.

Even with work standardization, costs for the same work can vary greatly and still be legitimate. Each cost accounting system is different in its specifics, and results in a different "bottom line" cost for the same work. The ethical dilemma of the archaeologist is often to be found in the professional and human impacts of these variations, even though they are operating within a single economic system.

Cost Accounting Elements in Archaeology

The basic elements within any cost accounting system for archaeological projects are direct labor costs, labor burden, other direct costs, overhead, general and administrative costs, and fee or profit. There are many ways in which these costs can be articulated in reaching a bottom line, and all need to be considered in their ethical context.

Direct labor is likely to be the major cost within any archaeological budget. This is the raw salary paid to the people who participate in a project. It is the first source of

the archaeological dilemma. The ideal project team will consist of seasoned specialists, people who have both academic qualifications and experience. This is often listed as a significant award factor. Every client wants a team composed of Ph.D.'s with 20 years of professional experience, but almost no client is willing to pay for such a team. The Contracting Officer's Representative, who earns \$15,000 to \$25,000 per year, commonly becomes upset at the very suggestion that a member of the archaeological team with equivalent qualifications might be paid the same salary.

In archaeology, the major distortions occur at both the upper and lower ends of the job scale. Managerial archaeologists are vastly underpaid, considering their responsibilities, in comparison with upper-level professionals in other fields. While *The Wall Street Journal* lists the average executive salary at \$120,000 per year, very few archaeologists in universities, government, or the private sector earn much more than \$50,000 per year. There is a major temptation among top professionals to get out of the field entirely or to transfer to other fields (e.g. more and more physical anthropologists seek appointments in medical schools, where their professional worth is better recognized in their paychecks).

An even greater tragedy occurs at the bottom end of the scale, where B.A., M.A., and even Ph.D. technicians work at \$5 and \$6 per hour, salaries far below the poverty level for someone with a family, in temporary and dead-end jobs with no job security in the current, highly competitive buyer's market. These underpaid professionals are hired on a project-by-project basis, with no guarantee of ongoing employment.

This leads us to the area of labor burden, or fringe benefits. According to the Service Contract Act of 1965, employees on federal contracts are required to get a certain number of paid holidays each year, a sick - leave plan, and premium wages for overtime work. The purpose of the act was to keep the contracts out of "sweat shops" that could bid low by exploiting their employees. However, it is doubtful that any archaeological contractor in the country could stay in business if he or she gave all of these benefits to all employees.

In order to be cost-competitive, archaeological contractors go to great lengths to keep their labor burden cost down. They can do this by hiring temporary or short-term employees who are exempt from benefit provisions, hiring through body shops where temporary employees sign away their rights to unemployment compensation, or by classifying their employees as "exempt" from the Contract Service Act. Some bids from academic institutions even avoid minimal workmen's compensation benefits for job-incurred injuries since their projects are classified as "training" programs. This may be survival, but is it ethical? Who can afford to take the first step to change it?

Other direct costs can vary considerably. They may include travel, transportation, housing, subsistence, and specialty services. Most archaeological travel, other than that for very specialized consulting, is still by motor vehicle. There can be a great deal of legitimate variation in mileage charges, depending on age and type of vehicle, insurance coverage, stage of amortization, and lease or rental cost. In a buyer's market, one can lower these costs by using old and cheap vehicles, keeping them in a state of ill re-

pair, and providing minimal insurance.

What of housing and subsistence? The concept of the "crew house" has great currency in American archaeology. Other professions regard being away from "home" as a hardship, but the field ethic of archaeology has turned this into a positive value. Archaeologists have convinced themselves that it is part of the profession to live under conditions inferior to those at most prison camps.

Overhead and general and administrative costs - the costs of doing business and holding a program together when one is not direct charging - are yet another part of the pricing dilemma. These are the administrative, marketing, plant, postage, and telephone costs. Overhead is an actual and auditable cost. It is not "something that we can negotiate" (even on a dedicated contract, the forward bid rate that is negotiated is subject to a post performance audit to determine the actual rate). It is not, as some academic archaeologists state, university profit at the expense of archaeological work.

Marketing is likely to be the single largest overhead cost; and most of marketing costs go into proposal preparation, particularly for marketing the federal sector. Most agencies simply do not realize the economic burden that this places on their contractors. Preparing a creditable proposal necessitates thorough research of the subject, study of the natural environment and past work in the area, and formulation of research problems and a concrete plan of work. If possible, project sites should be visited as a part of proposal preparation. This takes a great deal of time and money.

Other factors impact overhead, such as attending meetings, writing and publishing, visiting clients, subscribing to an array of national and regional journals, and actively participating in professional organizations. Even if these are not all directly paid for by a firm, they take time and dollars away from chargeable activities.

All of these activities increase the cost of archaeology. It is ironic that being a responsible professional is likely to make one less cost-effective and can actually drive one out of business entirely. One of the most successful contracting firms in the United States actually has a policy of discouraging employees from any type of professional participation, even on their own time and money, since they feel that it is not only not cost-effective but has the potential to expose their in-house secrets (jobs, bid rates, marketing strategy, etc.).

The matter of fee or profit also deserves some ethical consideration. Some archaeologists actually become irate at the idea of "making a profit out of archaeology." Nor is it easy to do so, despite tales to the contrary. A good gross does not necessarily mean a satisfactory net, and a good year can be followed by a series of very bad ones. The nature of business is cyclical. Many small firms have not been able to survive, especially those in government contracting, where one's audit cannot account for commercial marketing or interest costs as overhead (the latter must come out of one's fee.)

The average fee or profit for most archaeological projects is around 10 per cent of the cost. Institutions have often pointed to the fact that they submit no fee proposals, which does make them more competitive in

terms of price. For government projects, a 10 per cent fee is really marginal, since interest charges, overruns, and other unallowable costs in government accounting systems must come out of the fee. With the best of luck, a 10 per cent fee is likely, to net a 3 per cent profit. Corporate profits are taxed at a rate of nearly 50 per cent; when state and local taxes are added, the real rate of return is closer to 1 per cent. If this is returned to investors, it is taxed again as personal income. If it is held as retained earnings, it is taxed a second time as capital gains at the time of disposal of assets.

When one looks at the price rates in other professional fields, one finds a great deal of uniformity in the rates charged by lawyers, engineers, and even plumbers. All of them view themselves as being worth \$50 to \$75 per hour when all elements of cost and pricing are considered. Archaeologists, by comparison, seem to view their own worth as being more comparable to dishwashers and cabdrivers. There are some who even point to low prices with pride, not realizing that such prices also indicate what they feel they are worth. Archaeologists tend to do grave injustice to themselves because they are not familiar with the real costs of carrying out large-scale projects and are not ready or are unable to seek help from accountants and purchasing agents - and sometimes even view them as enemies. Unfortunately, the mistakes made among the higher echelons within the profession tend to be passed down through the ranks. It is not the Principal Investigator who underestimated the cost of the job, or the person responsible for underpricing it who is laid off or asked to work on the project without pay.

Actually, it is possible to be profit-

able; but the methods of doing so often pose an ethical dilemma. One can become very profitable by curtailing business development, particularly proposal, costs. In doing so, one cuts the actual overhead below the bid rate and adds to the profit. This tactic is used in the consulting field to make the profit-and-loss statement look attractive in anticipation of the firm's sale. Cutting inventory is an equivalent tactic in the retail trade. A prospect can look very attractive to a potential buyer; but, if one bites, he or she gets a burned-out backlog and must build the entire business base anew.

For the most part, the current system of training archaeologists does very little to prepare them for either the ethical or economic confrontations of the real world. Training in the greenhouse of university contracting is not real. This environment is based on a perfectionist ethic and emphasizes knowledge over performance. Projects are subsidized in one way or another, and there is no worry over such things as "receivable days" (the time between spending the money and being paid by the client).

The almost inevitable cycle that applies to institutions, firms, and individuals is as follows: one starts out in the real world by underestimating the real costs of doing business since one never had to pay the real costs in the greenhouse. Since one has a perfectionist goal and a bargain rate, one is immediately successful and shows a nice gross but actually is losing money. Increases in overhead rates and fees can cover actual costs but hurt the competitive edge. There is a tendency to panic as gross sales decline. This can lead to "dumping" - doing work at less than-production cost to stay in business until something better comes along - or to a

lowering of work standards. Finding the lowest common denominator and living with it is probably the best solution for staying in business.

Conclusion

There probably has never been a mitigation project in the United States where all of the costs of the project have actually been compensated as a part of that project. The real costs have been hidden by using field school students, who pay tuition to learn, as project laborers; by utilizing students on a seasonal basis with low salaries and few or no fringe benefits; by the degree-debt peonage of graduate students, who are viewed as a labor pool to clean up past mistakes; and by the long hours that mid- and senior-level project managers put in long after others have gone home at night. This has often been a "free lunch" for the agencies contracting for mitigation. Offering the "free lunch" has wiped out many small contractors, eliminated some institutional programs, and "burned out" countless archaeologists, particularly at the lower levels. In effect, the "free lunch" has been paid for in social costs to the field of archaeology.

As things stand, archaeologists have probably gotten just what they ask for and deserve. When they ask for more, when they learn to make accurate estimates of cost, when they realize what needs to be considered in pricing, and when they recognize their own worth, the days of the "free lunch" will be over.

NEWS AND NOTES

"That" Ministry Restructures Again!!

Yes, the provincial ministry with the word "Culture" in its name has changed again. Following a mid-winter cabinet shuffle and resulting internal re-organization, the former Ministry of Culture and Communications is now known as the Ministry of Culture, Tourism and Recreation. Reports have it that the former Archaeology Unit and Regulatory and Operations Group are now part of the Cultural Programs Branch, and have been combined and reconstituted at the Archaeology and Heritage Planning Unit. For the moment the same people are still at the same phone numbers, doing the same thing, but we'll keep an eye out for any further changes.

* * *

Stage 1-3 Guideline Soon to be Released

Staff of the MCTR Archaeology & Heritage Planning Unit have been working on revising and updating the Stage 1-3 Archaeological Assessment Technical Guidelines, following the March 27th workshop with archaeological consultants and representatives from APA and other interest groups. Subject to securing corporate approval, the Guidelines should be released by the Ministry this fall. Once released, this version of the guideline will replace the 1988 version published in Arch Notes.

APA Membership List - Abbreviated Version

Just so you know who you all are, here is an

abbreviated list of the APA membership.

Full Members:

Nick Adams, Newboro, Ontario
Tom Arnold, Halifax, Nova Scotia
Rebecca Balcom, Calgary, Alberta
Isobel Ball, Midland, Ontario
Thomas Ballantine, Haliburton, Ontario
Ann Balmer, Toronto, Ontario
Hugh Daechsel, Kingston, Ontario
Gordon Dibb, Peterborough, Ontario
Christine Dodd, London, Ontario
Christopher Ellis, London, Ontario
Neal Ferris, London, Ontario
Jacqueline Fisher, Hamilton, Ontario
William Fitzgerald, Hamilton, Ontario
Rita Griffin-Short, Hamilton, Ontario
Andrew Hinshelwood, Thunder Bay, Ontario
Lawrence Jackson, Port Hope, Ontario
Dean Knight, Waterloo, Ontario
Bud Parker, Waterloo, Ontario
Robert Pihl, Granton, Ontario
John Pollock, New Liskeard, Ontario
Dana Poulton, London, Ontario
Michael Spence, London, Ontario
Marianne Stopp, St. John's, Newfoundland
Rick Sutton, Burlington, Ontario
Stephen Cox Thomas, Toronto, Ontario
Philip Woodley, Hamilton, Ontario
Phillip Wright, Oxford Mills, Ontario

Associate Members

Alison Ariss, Port Hope, Ontario
David Black, Fredericton, New Brunswick
Jim Esler, University Park Pennsylvania
Irene Ockenden, Hamilton, Ontario

Applications Under Review

John MacDonald, Kitchener, Ontario
Jean-Francois Moreau, Chicoutimi, Quebec

NEWSLETTER EDITOR VACANCY

After 4 years of service, Neal Ferris is stepping down as the editor to this newsletter. Neal has agreed to assist the newsletter editor with the production of Issue 4 Number 2, but we need to find that replacement first. Anyone interested in serving as the newsletter editor should contact a member of the APA Executive ASAP.

APA ANNUAL MEETING

This year's annual meeting will be held on November 20th, at McMaster University. The morning session will include a number of presentations on current research. The afternoon will be a workshop/forum on artifact collections management and repatriation. The APA will be bringing in archaeologists from adjacent provinces and states, as well as Aboriginal representatives, to examine this issue. Further details will be mailed directly to all members.

OFFICERS OF THE APA

President:

Lawrence J. Jackson, P.O. Box 493, Port Hope, Ontario L1A 3Z4 Phone: 416-342-3250

Vice-President:

Philip Woodley, 255 Bold St., Apt. 405, Hamilton, Ontario L8P 1W1 Phone: 416-527-2670

Treasurer:

Rita Griffin-Short, 907-981 Main St. West, Hamilton, Ontario L8S 1A8 Phone: 416-524-1384

Secretary:

Dr. William Fitzgerald, 24 Mapleside Ave., Hamilton Ontario L8P 3Y5 Phone: 416-442-6964

Directors:

Phillip Wright, R.R. #2, Oxford Mills, Ontario K0G 1S0 Phone: 613-258-2795

Bud Parker, 279 Sandowne Drive, Unit 28, Waterloo, Ontario N2K 2C1 Phone: 519-888-0169

Dr. Dean Knight, R.R. #2, Petersburg, Ontario N0B 2H0 Phone: 519-744-7729

Newsletter Editor:

Vacant

