

2026 Federal Budget Written Submission for Pre-Budget Consultations

Submitted to the House of Commons Standing Committee on Finance by:

National Trust for Canada

Canadian Association of Heritage Professionals (CAHP)

ICOMOS Canada

National Trust  Fiducie nationale
for Canada du Canada



May 22, 2026

Recommendations

Recommendation 1:

That the government make a one-time investment of \$12 million to establish an endowment for the Canadian Register of Historic Places, enabling its permanent preservation, modernization, and operation as national cultural infrastructure at arm's length from government by the National Trust for Canada.

Recommendation 2:

That the government reintroduce and pass a Historic Places Act, to create a legislative framework for the continued use of heritage places and to establish the Canadian Register as a required tool in this work.

1. EXECUTIVE SUMMARY

Nothing is more uniquely Canadian than our historic places. The three undersigned national heritage conservation organizations represent thousands of professionals, property owners, volunteers, site operators, donors and philanthropists, trades and industry segments. The heritage conservation sector safeguards and extends the life and value of cultural heritage places for future generations, leveraging their economic, environmental, and functional values.

The Canadian Register of Historic Places (the Register) is a core piece of national cultural infrastructure. As the only pan-Canadian authoritative record of historic places recognized by federal, provincial, territorial and municipal authorities, it provides a foundation for Canadian identity and economic activity. It is also an essential planning and due diligence tool relied upon by architects, planners, engineers, developers and regulators, supporting decision making, environmental assessments and local economic development in every region of the country.

We recommend a **one-time federal endowment of \$12 million to the National Trust for Canada** to permanently stabilize, modernize and transfer stewardship of the register to an arm's length national organization while preserving federal participation in governance and standards.

This approach delivers measurable return on investment, ensures continuity of service and aligns with federal priorities, including digital government data sovereignty and sustainable infrastructure.

The endowment will enable Canada to:

- Secure and preserve the Register data permanently
- Restore uninterrupted public access to the Register
- Modernize the system using current, secure, and interoperable technology
- Establish an inclusive, arm's length governance framework
- Embed Indigenous data sovereignty and reconciliation principles
- Ensure long term financial sustainability beyond political and funding cycles

2. BACKGROUND AND PROBLEM DEFINITION

Since its launch in 2004, the Register has supported federal, provincial-territorial, and municipal planning, environmental assessment, conservation decision making, reconciliation initiatives, tourism education, and public access to heritage information. The Register contains a unified, publicly accessible record of more than 13,500 historic places recognized by federal, provincial, territorial, and municipal authorities across the country. It is the only pan-Canadian system that allows users to discover, compare, and understand historic places across jurisdictions. Today, the Register is at immediate risk of collapse.

The register is facing imminent decommissioning due to obsolete technology and the federal government's decision to step back from hosting and operating the system. Without intervention Canada faces fragmentation of a nationally significant public data set, the loss of public access and search functionality, the erosion of trust through unofficial and AI generated replicas and a long term reputational and operational risk for the federal government.

Federal Role

The Register was created as part of the Historic Places Initiative through a collaborative federal-provincial-territorial model. Parks Canada has acted as the federal steward and technical host, while provinces and territories retain ownership of their respective records.

This model succeeded in establishing a national system, with common standards and practices. However, no long-term sustainable funding model was embedded. As a result, the platform has reached end-of-life without a successor arrangement.

Current Risk to the Federal Government

Without action, the federal government faces material risks:

- **Loss of national data continuity:** Several provinces and territories rely on the Register as their primary public access to information about heritage places. Decommissioning creates immediate service gaps.
- **Public access failure:** Static archiving does not meet public or professional needs and raises accessibility and accountability concerns.
- **Policy incoherence:** Federal heritage and environmental assessment rely on reliable, shared data.
- **Reputational risk:** The disappearance of a national register undermines confidence in federal cultural stewardship.

The current situation constitutes a documented failure point, not a speculative risk.

The Value of the Register

The Register is:

- A planning and due diligence tool used by architects, planners, engineers, developers, and regulators
- A research and teaching resource used by educators, students, and scholars
- A public gateway to understanding Canada's history through place
- An instrument of coordination, allowing cross jurisdictional analysis that no provincial or territorial system can replicate

Public engagement confirms this value. **A national survey conducted in early 2026 received 932 responses, demonstrating that the Register is widely used by professionals and the public alike. Over 90% of users rely on location-based searching, and over 70% identify the Register as an authoritative source they depend on for accurate information.**

3. STRATEGIC RATIONALE FOR FEDERAL INVESTMENT

Why Federal Action is Required

In other countries, federal registers are led through the authority of the national government. 70% of Canadians who responded to a survey about the future of the Register are very concerned about the long-term sustainability of the system.

A decentralized or market-led response will not:

- guarantee data integrity or authority. This requires a formal agreement with data owners (governments).
- respect Indigenous data governance. This requires working with Indigenous partners.
- provide consistent national access. This requires a pan-Canadian view of heritage places and a mandate to be responsive to all parts of the country, in both official languages.
- ensure long-term sustainability. This requires adequate funding and a business model that will survive economic and political swings.

The federal government can provide the foundational, one-time capital necessary to transition the Register from a derelict government system to durable national infrastructure.

Why an Endowment (not Ongoing Program Funding)

An endowment model requires only one-time federal funding, rather than on-going appropriations. It provides certainty for both the government and the recipient about future financial obligations. An endowment removes long-term pressure from departmental reference levels and protects the recipient from future fiscal restraint cycles. The current request for \$12M is only half of the \$24M originally invested by the federal government in the Register in 2003.

Compared to continued federal operation or periodic system rebuilds, the endowment:

- Eliminates recurring federal costs
- Prevents repeated capital reinvestments
- Reduces long-term program and reputational risk

Why the National Trust for Canada

The National Trust for Canada is uniquely positioned to steward the Register because it:

- Is the only national charity with a mandate to preserve and promote historic places
- Is consistently trusted by jurisdictions and heritage organizations
- Can receive public and philanthropic funding and support the Register with both
- Has experience administering pan Canadian programs, including on behalf of the federal government
- Has an established “Trust” relationship with the federal Crown

An Opportunity for Canada

Renewal of the Register by a trusted Canadian charity makes it possible to re imagine the Register as modern national digital infrastructure, aligned with contemporary expectations for:

- Accessibility and bilingualism
- Open data and interoperability
- Indigenous partnership and data sovereignty
- Secure, Canadian based digital hosting
- Long term financial and institutional resilience

This approach resolves the Register issue **permanently**. Heritage places are here for the long term and having a system to share information about them with developers, planners, students and the public is also a long-term need. An endowment responds to the permanence of heritage places.

Stakeholders across governments, professions, and communities expressed effectively unanimous support for renewing the Register rather than allowing it to dissolve.

Renewal enables new, respectful, community-informed pathways for inclusion—while maintaining the Register’s authority and credibility.

4. PROPOSED SOLUTION

Establish the Register as Arm's-Length National Infrastructure

The proposal recommends transferring operational stewardship of the Register to the National Trust for Canada, operating the Register as a dedicated program with:

- Defined accountability to contributing jurisdictions
- Federal participation in governance (not operational delivery)
- Formal data contribution agreements
- Long-term financial independence

\$12 Million Endowment – Purpose and Impact

The \$12 million endowment will generate stable annual income to support:

- Technology development and maintenance (approximately 46% of costs)
- Secure hosting and cybersecurity (approximately 27%)
- Data stewardship and quality assurance (approximately 9%)
- Core staffing and governance (approximately 18%)

Detailed costing for the project is available in the report *A Path Forward for the Canadian Register of Historic Places* (Claro Solutions, 2026), available on request.

Public Value

The public value of the project is reflected in:

- **National Infrastructure:** The renewed Register will be a cornerstone for heritage conservation, planning, education, and tourism
- **Economic Value:** Supports real estate, renovation, and local economic development, as well as directly creating jobs in the IT and charitable sectors.
- **Cultural Identity:** Preserves and celebrates the full diversity of Canada's heritage for future generations
- **Sustainability:** The endowment ensures resilience against political and economic cycles, providing stable, long-term stewardship

5. ALIGNMENT WITH FEDERAL PRIORITIES

The Canadian Register promotes national identity. Historic places define communities and shape our view of ourselves and our place in the world. Easy access to information about lighthouses and grain elevators, train stations and the humble homes of immigrants, shapes a shared view of who we are as Canadians and the experiences and values that have shaped our national identity.

This proposal advances key federal objectives, including:

- **Digital government:** Modern, secure, and accessible platforms
- **Fiscal responsibility:** One-time investment instead of ongoing liability
- **Nation-building:** Preserving shared cultural infrastructure
- **Intergovernmental collaboration:** Respecting jurisdictional authority
- **Reconciliation:** Indigenous governance and data sovereignty

6. CONCLUSION

The National Trust for Canada, Canadian Association of Heritage Professionals, and ICOMOS Canada respectfully request:

- **A one-time federal investment of \$12 million to establish an endowment for the Canadian Register of Historic Places, enabling its permanent preservation, modernization, and operation as national cultural infrastructure at arm's length from government by the National Trust for Canada.**

This decision would remove an ongoing federal risk and secure a national asset for future generations. Canada has the opportunity to ensure that the Canadian Register of Historic Places endures as a trusted public resource for generations to come, as a modern, inclusive and resilient foundation for Canada's heritage.

The Register is acknowledged as essential. It is too important to let fail. The question before the federal government is not whether it should exist—but whether it should exist reliably, authoritatively, and permanently. Canadians expect federal leadership on its continued operation. A one-time endowment is the most responsible, forward-looking solution.

To maximise the impact of this investment, the related Recommendation 2 calls for the reintroduction and passage of a Historic Places Act, to create a legislative framework for the continued use of heritage places and to establish the Canadian Register as a federal tool.

In addition, we support the recommendations of the Canadian Museums Association and the Indigenous Heritage Circle in their 2026 Pre-Budget Submission, which calls for the restoration of Museums Assistance Program funding, investment in Indigenous-led cultural heritage rights, and the stabilisation of heritage youth employment through Young Canada Works.

Respectfully submitted,



Adam Hatch

President

Canadian Association of Heritage Professionals

ed_dg@cahp-acecp.ca



Mario Santana Quintero, PHD

President

ICOMOS Canada

secretariat@icomos.canada.ca



Patricia Kell, DPhil

Chief Executive Officer

National Trust for Canada

pkell@nationaltrustcanada.ca

About the Organizations

National Trust for Canada  Fiducie nationale du Canada

Created in 1973, the **National Trust for Canada** is the leading national charity dedicated to the conservation and promotion of Canada's historic sites. The Trust believes that heritage places are a catalyst for strong communities by fostering identity, driving economic activity, enhancing belonging, advancing Reconciliation, supporting climate resilience, and promoting well-being.



The **Canadian Association of Heritage Professionals (CAHP)** is a national membership-based organization that serves qualified heritage professionals in the public, private and not-for-profit sectors. CAHP establishes standards of practice, shares knowledge about heritage conservation, and supports the involvement of heritage professionals whenever places of heritage value are being identified, preserved, restored and rehabilitated.



ICOMOS Canada is the Canadian national committee of the International Council on Monuments and Sites (ICOMOS). Since 1975, ICOMOS Canada has been at the forefront of the heritage conservation movement in Canada and abroad, actively contributing to the development of the theory and practice of cultural heritage conservation.