

November 9, 2021

Via e-mail: Katerina.downard@ontario.ca

Ministry of Transportation

Environmental Policy Office

777 Bay Street, Suite 700

Toronto, Ontario

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Attention: Katerina Downard

Senior Policy Analyst

RE: Comments on Modernizing Ontario’s Vehicle Inspection program & integrating safety and emissions inspections for commercial vehicles ERO Number 019-4277

The Ontario Road Builders’ Association (ORBA) would like to provide the following written comments in response to the posting of the draft regulation: Modernizing Ontario’s Vehicle Inspection Program & Integrating Safety and Emissions Inspections for Commercial Vehicles as posted on the ERO (Environmental Registry for Ontario) for public comment (ERO #019-4277).

The Ontario Road Builders’ Association is proud to represent the road building sector in Ontario. Our members build the majority of provincial and municipal roads, bridges and transportation infrastructure across the province. The road building sector directly and indirectly employs approximately 56,000 workers at peak season and impacts all Ontarians.

ORBA supports the shift towards more digital, streamlined approaches, and we recognize that the paper-based MVIS program has become outdated. Moving the vehicle emissions process to a digital platform and integrating it with other functions of vehicle safety already being performed by MVIS stations will likely save time and administrative costs in the future.

That said, ORBA is concerned that the upfront costs and increased inspection details may lead to a significant increase in operational costs. The service costs and additional financial burden on service stations remains unclear and could lead to some smaller stations leaving the business, a consequence of which includes a loss of valuable institutional knowledge. ORBA anticipates that some of the additional costs will be transferred onto vehicle owners and therefore impact members who own large fleets. Until the full scope of the financial burden is outlined, ORBA will continue to be engaged on this issue.

Furthermore, ORBA members have also expressed concerns that the new digital system might require additional training. The Ministry might consider providing detailed training sessions well before the official program launch in 2023. The two-year grandfathering clause should be sufficient for industry to comply with the program. The Ministry might consider including some milestones to avoid industry disruption when the grandfathering approaches its end.

Thank you for the opportunity to provide comments. Please do not hesitate to contact Brianna Puigmarti, Policy Advisor, Policy & Stakeholder Relations Division, at [brianna.puigmarti@orba.org](mailto:brianna.puigmarti@orba.org).

We are available to answer any questions regarding this submission.

Sincerely,

Bryan Hocking

Chief Executive Officer

Ontario Road Builders’ Association

Cc: ORBA Board of Directors