

November 6, 2025

ERO number: 025-1140

Proposal name: Bill 60 - Fighting Delays, Building Faster Act, 2025 – Supporting the Harmonization of Municipal Road Construction Standards

Introduction

The *Fighting Delays, Building Faster Act, 2025* is a pivotal opportunity to close Ontario's housing and infrastructure gaps by accelerating delivery. To further support the province's rapid growth, 3M Canada is advocating for the government to standardize road building specifications, design and procurement across Ontario. This once-in-a-generation opportunity to harmonize construction standards should extend beyond housing to encompass all facets of road construction and safety, including engineering design, aggregate and material selection, lane markings, traffic control devices (such as signs, changeable message systems, traffic barrels) and highly visible construction barriers.

Recommendations

Harmonized standards established under the Act's new regulation-making power must be modern and safety-led, not just optimized for construction speed. While harmonization is about uniformity, the standards should not default to a "lowest common denominator". Instead, Ontario should adopt best practice, performance-based standards that prioritize long-term road integrity and safety features. Procurement should move beyond lowest cost, minimum compliance awards to incorporate life cycle value. Ontario should adopt Michigan's life cycle cost analysis (LCCA) approach within construction analysis and procurement. According to the Michigan Department of Transportation's longstanding practice, state-funded projects over \$1.5 million require an LCCA that accounts for initial construction, future maintenance, user delay during construction and maintenance, and remaining life value—identifying the most cost-effective pavement over its service life¹. This kind of selection process rewards low initial cost, quick construction, and minimal life-cycle maintenance, driving the best return on investment and continuous industry innovation.

Motor vehicles have been the leading cause of work-related fatalities in Ontario every single year during the past decade. Improving road safety through consistent pavement marking standards to provide road users clear and uniform guidance, can reduce confusion and potential collisions. Yet, for municipal roadways, Ontario still does not specify any minimum dry or wet retro-reflective requirements (OPSS MUNI 710) and the broader Ontario Traffic Manual (OTM) Book 11 - Pavement Markings both lack any defined minimum requirement. Current surface applied lane markings often provide low retro-reflective visibility and degrade quickly, requiring retracing as often as one to two

times per year. Weather constraints can leave markings in disrepair or not visible until conditions allow retracing.

Ontario should mandate performance-based pavement markings with immediate minimum performance requirements for all road markings, including both:

1. A minimum dry retro-reflective value for immediate visibility
2. A minimum wet continuous performance (wet-recovery and wet-reflective) to significantly enhance visibility during rain and at night.

Industry also needs the Ministry of Transportation to publish a clear decision tree (or similar guidance tool) for material selection in pavement markings and other road construction applications, correlating material type with road classification, traffic volume, and climate conditions. A standardized decision tree would expedite road design by reducing discretionary decision points, streamlining internal reviews and approvals, and minimizing design iterations. A Standards Advisory Committee of technical experts can develop and update these tools and standards to incorporate the latest materials and technologies.

Road construction standards are as important as home building standards. The Ontario Building Code is reviewed every five years, with proposals made publicly available for consultation. By contrast, Ontario's OTM's are significantly out of date. OTM Book 11 for Pavement Markings has not been updated in 25 years and still has no minimum retro-reflectivity requirements. Separate Ontario Provincial Standard Specifications (OPSS) for provincial (PROV) and municipal (MUNI) projects have led to inconsistent requirements, quality and safety across jurisdictions. The government should legislate comprehensive five-year reviews of road-building standards (e.g., OPSS and OTMs) to keep pace with new technologies, materials and safety data. A permanent Standards Advisory Committee comprising of material suppliers, engineers, safety experts and municipal representatives should be established to ensure the standards remain current, practical, and performance based. Standardized construction requirements can shorten approvals, reduce costs and help build safer roads faster, while avoiding costly redesigns across jurisdictions.

Conclusion

The Fighting Delays, Building Faster Act, 2025 is a generational opportunity to harmonize road building standards, strengthen safety and improve efficiency. By updating outdated guidance, mandating performance criteria, embedding life cycle value in procurement and establishing robust governance for ongoing reviews, Ontario can deliver a safer, more reliable transportation network that supports accelerated housing growth. Legislated, recurring reviews will streamline processes, ensure predictable outcomes and deliver safer, more cost-effective infrastructure across the province – serving the public's best interests.

Sources

1. Chuck Mills and Brett Stanton, "Durability in the Wolverine State: Increasing return on investment for taxpayers in Michigan," Roads & Bridges, October 2025.
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