

November 21, 2025

**Submitted online and via email to [mto.ero@ontario.ca](mailto:mto.ero@ontario.ca)**

Ministry of Transportation  
Environmental Policy Office  
438 University Ave, 12th Floor  
Toronto, ON, M7A 1N3

**RE: Supporting the Harmonization of Municipal Road Construction Standards.**

The City of Guelph (the "City" or "Guelph") appreciates the opportunity to provide feedback on the proposed amendments to the *Public Transportation and Highway Improvement Act* to support future harmonization of municipal road construction standards. Below, you will find the City of Guelph's comments regarding the proposed amendments.

**Proposal Summary:**

Currently, the [Public Transportation and Highway Improvement Act](#) (the Act) grants the Minister of Transportation (the Minister) authority to issue regulations which set mandatory standards for various roads, highways, and bridges. Currently, there is no regulation under the Act governing the standards for municipal roads, however, the province has committed to work towards a regulation setting out harmonized municipal road standards across Ontario.

To support a future municipal road standard, Schedule 11 of [Bill 60](#) proposes several amendments to the Act, including new regulation-making authority to set out rules for the non-application of road standards, and issue regulations governing road-related contracts. Additionally, the proposed amendments would authorize the Minister to require information from municipalities, experts, and other stakeholders to inform future municipal road construction standards.

**Comments**

The City of Guelph is highly supportive of this step towards developing common road standards, which will support efficiencies and cost reductions in the road building sector. The [Ontario Provincial Standards](#) (OPS) have been of incredible value to Ontario municipalities for many years. Similarly, Guelph has worked with the Region of Waterloo and area municipalities for over 20 years to maintain a set of [local standards](#) that expand on the OPS. These standards recognize that benefits are realized for both the

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construction industry, development industry and municipalities when common design guidelines and contract specifications for municipal services are developed.

Like the OPS, the key to success for common standards is that municipalities have the flexibility to establish their own supplemental standards to account for local project preferences and specific constraints. The future harmonized road standards must lead by example and not be compulsory. A one-size fits all model will not achieve provincial goals given the wide range of local conditions informing road design.

The City recommends that the harmonized standards be apolitical, and be informed by technical experts from a wide range of stakeholders, including owners, contractors, and industry associations such as the Municipal Engineers Association, Good Roads, Ontario Road Builder's Association, Ontario Public Works Association, Ontario Traffic Council, and ITE. It is also important that this stakeholder group include organizations with expertise in non-automotive road design to support all road users.

It will also be important to implement a robust mechanism for monitoring and updating these standards, which supports the tracking of best practices, materials and learned lessons to improve the harmonised standards. This will require an investment in professional administrative staff to assist technical experts to maintain the harmonised standards. Again, the OPS is a good model to expand upon when considering future road standards.

**Closure:**

We appreciate this opportunity to provide input on this proposal, and look forward to participating in the development of the common harmonized road standards enabled by this legislation. Should you have any questions about the feedback provided, or require additional details please do not hesitate to contact the City at [intergovernmental.relations@guelph.ca](mailto:intergovernmental.relations@guelph.ca).

Sincerely,

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