



November 20, 2025

Municipal Standards Harmonization Office
95 Arrow Rd Flr 2
Toronto, ON
M9M 2L4
Canada

Re: Conservation Ontario's comments on "Bill 60 - Fighting Delays, Building Faster Act, 2025 – Supporting the Harmonization of Municipal Road Construction Standards" (ERO#025-1140)

Conservation Ontario is the voice of Ontario's 36 Conservation Authorities (CAs). We offer the following comments further to CA mandatory programs and services, including natural hazard management and drinking water source protection.

Schedule 11 of Bill 60, the *Fighting Delays, Building Faster Act, 2025* introduces amendments to the *Public Transportation and Highway Improvement Act (PTHIA)*. Amendments expand on the Minister regulation-making authority to establish standards for planning, design, construction, maintenance and operation of highways, bridges and related structures / works.

Additionally, amendments provide the ability for the Minister to require technical advice before or after a standard is established, including information from municipalities, local boards, and other stakeholders.

Conservation Ontario supports the development and application of standards for municipal roads and bridges to provide timely, consistent, and safe infrastructure development in Ontario.

- CAs provide technical, scientific expertise to support municipal infrastructure projects as a commenting agency through the environmental assessment and planning processes, and as a regulator under the *Conservation Authorities Act*. This local knowledge and expertise facilitates safe and resilient infrastructure design.
- Road culverts and bridges in particular must be designed so that they do not constrain flood waters during high water events, exacerbate flooding upstream, or impede safe access for the public during natural hazard emergencies. Insufficient design standards for the local conditions can result in road and bridge failures during flooding events.

- As the Ministry begins development of standards, **Conservation Ontario recommends that CAs be engaged to provide technical information supporting planning, design, construction and maintenance of municipal roads and bridges.**
- Further to the planning of municipal roads and bridges, Conservation Ontario **recommends the standards specify key agencies for consultation and engagement during the planning phase, including applicable CAs.**
- Early integration and consideration of CA science, policy and regulatory standards will help identify preferred methodologies and design standards.

Under the amended *PTHIA*, the Minister will have authority to make regulations providing for the non-application of established standards, including a process for proponents to request that standards do not apply and details governing the review and approval of such requests.

- Establishing standards will provide a fair and consistent framework for municipal road and bridge works that consider best available science, methodologies, and applicable legislation / regulations.
- Should the new regulation-making authority be used, **Conservation Ontario recommends the Province include criteria specifying when requests for the non-application of standards can be made, as well as criteria for the Minister's evaluation of non-application requests.**
- It should be explicitly noted that in circumstances where established standards do not apply, **proponents must still ensure compliance with relevant legislative and regulatory requirements** (e.g., permitting requirements under the *Conservation Authorities Act*).

Thank you for the opportunity to review and provide comments on "Bill 60 - Fighting Delays, Building Faster Act, 2025 – Supporting the Harmonization of Municipal Road Construction Standards" (ERO#025-1140). Conservation Ontario understands that future regulations are required to implement the proposed legislative changes. We would be pleased to further discuss these comments at your convenience and look forward to future opportunities to engage on proposed implementing regulations.

Sincerely,

Nicholas Fischer

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Policy and Planning Specialist

c.c. All CA CAOs/GMs