

November 14, 2025

Municipal Standards Harmonization Office
95 Arrow Rd., Floor 2
Toronto, Ontario
M9M 2L4

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

About Us

Good Roads is a municipal association concerned with the quality and design of roads in Ontario. We have been devoted to the cause of better roads since 1894. Originally known as the Ontario Good Roads Association (and still using that name corporately), our members include most of Ontario's municipalities and a growing number of First Nations as well as dozens of affiliated corporate members in the transportation and infrastructure sectors.

For more information, please visit www.GoodRoads.ca.

Comments

Good Roads appreciates the opportunity to provide input and collaborate with the Ministry of Transportation to improve municipal road construction in Ontario.

Ontario's 444 municipalities are responsible for maintaining **298,973** lane kilometres of roadway, with a replacement value of **\$143.87 billion**. Yet there is no standardized approach to how these assets are designed and built. Industry groups estimate that there are more than **300** different asphalt mixes currently used in the GTA alone. This creates inefficiencies, increases up costs, and slows project delivery.

Bill 60, the *Fighting Delays, Building Faster Act, 2025*, has created a window of opportunity to correct this problem. By harmonizing Ontario's municipal road construction standards, the province has a chance to unlock billions in savings and accelerate infrastructure delivery. It is important that the promised savings flow through to the public and are not simply captured by the private sector.

The financial benefits of harmonization are compelling. Good Roads estimates municipalities could collectively save up to **\$4.17 billion** over the next decade. These savings would flow from bulk purchasing power, faster delivery timelines, improved labour productivity, and longer-lasting pavements. At a time when every tax dollar is under pressure, harmonization represents a direct way for the province to reduce costs and improve results.

Good Roads

Standardized road construction practices should allow municipalities to deliver projects more quickly, which directly supports Ontario's housing and infrastructure targets.

The success of harmonization depends on municipal and provincial coordination to address the costs of implementing a standardization scheme. Good Roads has calculated the transition costs will be close to **\$955 million** and will fall disproportionately on smaller, rural, and northern municipalities that are least able to absorb them.

At the same time, based on experiences in other jurisdictions, it is very likely that harmonization will lead to market consolidation in the road construction industry, significantly reducing the number of firms. Fewer firms means less competitive tendering processes.

Recommendations

1. Create a \$250-million transition fund

Harmonization will succeed if the public's interest drives the policy and program design. Good Roads is recommending the creation of a provincial transition fund of up to **\$250 million** to help municipalities – particularly smaller, rural, and northern – cover the upfront costs of change. This could include, but is not limited to, costs associated with training & certification, testing equipment & labs, IT systems, and legal & regulatory compliance.

2. Establish a provincial-municipal governance structure

Good Roads is also recommending that the province establish a governance structure to oversee the process. This entity should be co-led by the province and municipalities, with allowances for ex-officio industry and technical experts to help inform transparent and balanced decision-making.

3. Encourage innovative procurement practices

Finally, Good Roads also knows that the success of this initiative will hinge on how municipalities evolve their procurement processes to respond to a consolidating marketplace. Innovative approaches to procurement and contract structures will need to be widely adopted by councils. This is the only guarantee that the savings generated by harmonization will flow back into public budgets rather than private margins.

Good Roads looks forward to the continued progress of this initiative and we extend our gratitude to the Ministry for your engagement in this important work. We remain committed to supporting the government's initiatives and contributing to the standardization of municipal road construction standards.

Thank you for your time and consideration.