



November 21, 2025

Ministry of Transportation
Municipal Standards Harmonization Office
95 Arrow Road, Floor 2
Toronto, ON
M9M 2L4

Re: ERO #025-1140 – Harmonization of Municipal Road Construction Standards

The Ontario Sewer and Watermain Construction Association (OSWCA) represents more than 850 companies and 30,000 skilled workers who build and maintain water, wastewater, road, and bridge infrastructure that supports communities across Ontario. We appreciate the opportunity to comment on the proposed regulatory amendments under *Bill 60, Fighting Delays, Building Faster Act, 2025*, which authorizes the Minister of Transportation to set mandatory standards for municipal construction.

Municipalities own, and are responsible for maintaining, a majority of Ontario's linear infrastructure. One of the unique challenges that comes with having 444 different municipal owners, is that each designs, constructs, manages, and maintains their respective infrastructure assets in a way unique to their municipality. This lack of standardized approach means that designers and contractors cannot design and build public infrastructure the same way in every municipality. It also means that municipalities miss out on economies of scale on design, construction, and material purchases, among other things.

This comes in spite of the fact that a standard set of municipal specifications exist and are consistently updated by the Ministry of Transportation, Municipal Engineers Association, and industry stakeholders: the OPSS MUNI specifications. Utilizing OPSS.MUNI has never been made mandatory and so the result is inconsistencies across jurisdictions, added administrative burden, procurement delays, and increased design and construction costs.

OSWCA supports mandating OPSS.MUNI and full standardization across all municipal construction specifications and documents. However, if the Ministry of Transportation proceeds with a phased approach, **OPSS.MUNI Drainage** specifications must be included as part of the initial phase, as it governs the design and construction of critical water and wastewater infrastructure.

Ontario municipalities need to invest \$250 billion over the next decade to keep up with the demand for rehabilitation and expansion of municipal infrastructure. Meeting this

scale of demand requires a consistent, harmonized provincial framework to support the delivery of this critical infrastructure that will help advance the province's housing and economic goals.

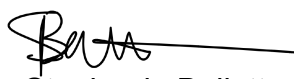
The benefits of including Drainage specifications as part of the government's initial standardization process includes:

- **Cost savings and efficiency:** harmonized specifications promote economies of scale through competitive procurement, reduced administrative work, reduced project risk, and fewer project-specific design modifications and disputes;
- **Faster project delivery:** consistent requirements reduce time spent interpreting local variations, revising designs, or resolving technical discrepancies;
- **Improved quality, durability, and public safety:** province-wide benchmarks ensure that all municipalities are building to standards that support long-term asset performance and reduce emergency repairs;
- **Streamlined project management:** clear, uniform expectations simplify planning, contract administration, and oversight which leads to a reduction in the number of disputes and delays; and,
- **Support for northern and rural communities:** standardization enables more designers and contractors to bid on work across the province, increasing competition, lowering costs, and helping smaller municipalities access specialized expertise.

Ontario already has a strong governance framework to support this work. OPSS.MUNI are developed and reviewed through the established OPS governance structure. This structure has a long history of producing balanced, technically rigorous municipal standards and is well-positioned to guide the transition to mandatory, harmonized specifications. OSWCA recommends that the province continue to rely on this existing governance model for the ongoing management, review and updates of harmonized municipal construction standards.

We welcome ongoing collaboration with the Ministry of Transportation and remain committed to contributing our technical and industry expertise to support this important initiative.

Sincerely,



Stephanie Bellotto

Manager, Government Relations and Communications
Ontario Sewer and Watermain Construction Association