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November 20, 2025

Bruce Cane Director, Standards and Contract Branch Ontario Ministry of Transportation

Katie De Palma Director, Transportation Policy Branch Ontario Ministry of Transportation

Sent via email to Katie.DePalma@ontario.ca and Bruce.Cane@ontario.ca

Dear Mr. Cane & Ms. De Palma,

RE: ERO 025-1140: Bill 60 – Fighting Delays, Building Faster Act, 2025 – Supporting the Harmonization of Municipal Road Construction Standards

The Ready Mixed Concrete Association of Ontario is the voice of over 80 ready mixed concrete producers in Ontario. With over 6,000 direct employees, our members are responsible for the design, manufacture and delivery of more than 11 million cubic metres of concrete to the Ontario construction sector every year. We are a critical contributor to the infrastructure of Ontario.

We are pleased to provide input into ERO #025-1140: Bill 60 – Fighting Delays, Building Fast Act, 2025 – Supporting the Harmonization of Municipal Road Construction Standards. We are strong supporters of the government's efforts to speed up infrastructure in the province and welcome the opportunity to contribute our input into the proposed legislative and regulatory changes.

We support the government's harmonization efforts to create efficiencies in municipal road construction by improving the adoption and application of common standards.

To that end we offer the following recommendations:

1. Specify OPSS 1350-MUNI – Material Specifications for Concrete across the province

Adopting OPSS 1350 MUNI (Material Specification for Concrete) would create a uniform provincial approach for concrete standards, reducing fragmentation between municipalities and enabling faster procurement and construction.

The MUNI specification reflects modern, performance-based criteria that supports innovation, sustainability, and local economic efficiency. The OPSS 1350 MUNI directly

references CSA A23.1/.2 standard, the primary specification for ready-mixed concrete across Canada. CSA A23.1/2 is a peer reviewed standard with inputs from the concrete manufacturers, contractors, engineers, government and academia using the most up to date information to ensure long term performance of concrete.

At the same time, it is important to highlight that the industry strongly opposes adopting the provincial standard (OPSS 1350 PROV) as it does not go through the same stakeholder consultation and technical rigour. The adoption of **OPSS.PROV 1350** for municipalities will also be a significant additional cost for municipalities due to the additional testing and inspection requirements and the government oversight needed to manage the contracts.

The Cement and Concrete industry would also recommend following the OPSS.MUNI version of specifications for all concrete related applications such as OPSS.MUNI 350 (Concrete Pavement and Concrete Base) and OPSS.MUNI 904 (Concrete Structures).

At the same time, we would request that the implementation date give adequate lead time for transition and avoid disruption to the 2026 and 2027 construction seasons.

2. Protect capital projects already in design and construction stages

Consistent with the recent submission from Toronto and Area Road Builders Association (TARBA), we strongly agree that projects already underway should not be disrupted.

We recommend that any project under contract, tendered, or in the design phase at the time the OPSS 1350 MUNI specification comes into effect be permitted to proceed under its original terms. This approach will prevent unnecessary cost escalations, avoid schedule delays, and ensure continuity across municipal construction programs.

We thank you for considering our feedback on this important matter.

Sincerely,

Bart Kanters, President Concrete Ontario

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