

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

The Toronto and Area Road Builders Association (TARBA) is the collective bargaining agent with LiUNA 183, IOUE Local 793, and Teamsters Local 230, representing more than 180 unionized contractors building multi-modal transportation infrastructure, including roads, transit, highways, bike lanes, and sidewalks, in the Greater Toronto Area and Simcoe County.

We welcome the opportunity to provide input into ERO 025-1140 and thank the Ministry for its leadership in bringing about this legislative change. We fully support the province's intent to harmonize municipal road construction standards to accelerate capital project delivery, improve cost-effectiveness, and build high-performing infrastructure across Ontario's municipalities. We refer you to our initial submission, Appendix A, which outlines the significant challenges with the current fragmented system and the benefits that standardization would bring.

We want to emphasize five priorities that are critical to ensuring a successful implementation of spec standardization in a way that is practical, workable, and supportive of the construction industry, municipal owners, and taxpayers.

### **1. Make OPSS.MUNI mandatory for all municipalities, in its entirety, effective January 1, 2028.**

We respectfully request that the regulation under PTHIA specify mandatory adoption of OPSS.MUNI by all municipalities **effective January 1, 2028**, to allow adequate lead time for transition and to avoid disruption to the 2026 and 2027 construction seasons.

Since the use of OPSS.MUNI is not mandatory, OPSS specifications and drawings have not been widely adopted among municipalities in Ontario. Choosing a target date of January 1, 2028 provides a clear horizon for municipalities and industry to prepare: update procurement documents, revise internal contract templates, train staff, align future tenders, and mitigate any disruptions to the construction season in 2026 and 2027. A two-year lead time is prudent, given municipal budget cycles, staffing and resource constraints, and the need to continue with planned capital investments at the municipal level.

We recommend that the regulation arising under PTHIA specify that as of January 1, 2028, municipalities must adopt OPSS.MUNI in full, subject only to documented exemptions pre-approved by the OPS Committee, and that any deviations require prior approval and evidence-based justification.

## **2. Safeguard capital projects already in design and construction stages.**

Municipalities already have projects in various stages of design, procurement, or active construction. Mandating immediate adoption of OPSS.MUNI without transitional measures could disrupt these ongoing projects, leading to costly redesigns, contract disputes, or delays in the construction schedule.

To protect both public investment and contractor resources, TARBA recommends that projects already under contract, tendered, or in the design stage at the time of the OPSS.MUNI mandatory effective date be allowed to continue under the specifications and contract documents under which they were initiated.

This ‘grandfathering’ approach ensures continuity, avoids unnecessary cost escalation, protects contractors’ cash flow and planning, and maintains the integrity of municipal capital programs.

It also aligns with best practices in standards implementation, where regulatory changes include reasonable transitional provisions to avoid retroactive impacts on existing projects.

## **3. Prioritize high-impact areas, including asphalt mixes, aggregates, and general conditions of contract.**

Material use, asphalt mix designs, and general conditions of contract represent the greatest variability, risk, and cost inefficiencies in municipal road construction practices. For example, asphalt paving standards and aggregate specifications vary greatly across municipalities. A [recent CANCEA report](#) found that harmonizing asphalt standards within the GTA alone would unlock nearly \$1 billion in value over the next decade and broader road building standardization could unlock \$11.7 billion. Following the OPSS.MUNI helps produce consistency in testing regimes, material allowances, and acceptance criteria.

Focusing on these three areas first achieves a “big win” early: aligning material and method standards reduces tendering complexity for contractors who work across multiple municipalities, and aligning general conditions of contract improves clarity, reduces risk, and supports more predictable procurement.

While a full suite of municipal standards is the ultimate objective, concentrating initial efforts on these priority areas allows a manageable scope, quicker uptake, and measurable benefits in the short term, setting a strong foundation for subsequent sections of the OPSS.MUNI.

This targeted approach aligns with best practice change management: begin with high-impact, high-feasibility elements, then expand. TARBA supports such sequencing and commits to working with the province, municipal owners, and OPS committees on implementation of those areas in advance of the 2028 effective date.

#### **4. Conduct a comprehensive review of OPSS.MUNI standards**

Before mandatory adoption in January 2028, it is essential to review the OPSS.MUNI standards in their entirety to ensure they are current, complete, and practical for implementation across all municipalities. The review allows for the identification of outdated specifications and gaps in technical guidance, reducing the risk of errors or confusion during adoption. A comprehensive review reinforces confidence in the standards, mitigates implementation risks, and maximizes the benefits of harmonization for cost efficiency, quality, and public safety.

#### **5. Develop additional standard contract documents to support specifications.**

Harmonized technical specifications and drawings will undoubtedly deliver infrastructure projects more efficiently and cost-effectively. However, without well-developed, standardized contract documents, municipalities may still rely on local, varied templates, undermining the benefits of standardization.

While the general conditions of contract in the OPSS.MUNI set the overall legal and administrative framework, additional standard contract documents would provide practical tools for tendering, pricing, technical compliance, contract amendments, reporting, and inspection—all necessary to ensure OPSS.MUNI standards are applied consistently and efficiently across municipal projects.

This is why TARBA recommends that the Ministry and OPS Secretariat, in collaboration with municipal owners, contractors, and engineering consultants, produce a suite of standard contract templates to support the OPSS.MUNI. These standard contract documents would reduce procurement risk and therefore costs, shorten tendering timelines, and improve quality control. The stakeholder collaboration in development ensures that the documents reflect common construction practices and contract realities, facilitating buy-in and smoother implementation.

British Columbia has already shown the benefits of this approach through its Master Municipal Construction Documents (MMCD), which provide a one-stop set of standard documents for municipal infrastructure projects, including roads, sidewalks, sewers, and water systems. With widely used templates and standard conditions, municipalities and contractors spend less effort creating unique contract documentation for each project.

The development of these documents should commence immediately, with draft templates ready for municipal review before the end of 2026, so that municipalities can begin internal adoption, staff training, and alignment of upcoming tenders ahead of the January 2028 implementation date.

To strengthen confidence in and promote earlier adoption of OPSS.MUNI during the transition period, we would encourage the Ministry to focus on strengthening the

existing governance framework by:

- **Maintain a Structured, Representative Governance Model:** The OPS Advisory Committee should serve as the governance lead and overall approval body and continue to be supported by Specialty Committees responsible for technical specification development, with representatives from the Ministry of Transportation (MTO), municipalities, and industry.
- **Implement a Fixed, Recurring Review Schedule:** Establish a predictable review process to ensure transparency and accountability when updating standards that includes feedback beyond the existing committee structure. Decisions on standard changes should be evidence-based, using field data, pilot projects, and lifecycle cost analysis.
- **Adopt a Tiered Model:** Core Standards should be mandatory and apply across all municipalities in Ontario. These should cover non-negotiable areas such as material specifications and general conditions of contract. Regional Standards can be tailored for Ontario's five MTO regions: Central, Eastern, Western, Northeast, Northwest, allowing for climate and traffic-specific needs while maintaining regional economies of scale, such as asphalt mix designs. This approach would avoid municipalities issuing their own standalone supplementary specs and allow flexibility while maintaining consistency.
- **Develop a Formal Customization Process:** Municipalities wishing to introduce additional customizations outside of OPSS.MUNI must provide evidence and have it reviewed and approved by the OPS governance board before implementation. This ensures that innovation and quality improvements are shared across the province as part of Core and Regional standards, rather than remaining siloed in individual municipalities.

Allowing each municipality to set its own infrastructure building standards creates fragmentation, inefficiencies, and quality variability. By adopting OPSS.MUNI, municipalities will benefit from uniform standards that simplify tendering, streamline processes and reduce duplication, improve quality, sustainability, and safety, *and* lower costs. Cutting red tape and uncertainty reduces risk and waste, while boosting productivity and competitiveness; it creates a more level playing field, especially for small and medium-sized businesses.

The construction industry is united in its opinion that standardizing both procurement and road building specifications at the municipal level will enable capital construction dollars to go further, expedite project design and delivery, and enhance quality, performance, and sustainability.

TARBA believes that by combining the above five priorities, the province will establish a firm foundation for harmonized, cost-effective, high-quality municipal road construction across Ontario. The harmonization initiative presented in ERO 025-1140 is timely and

much-needed; our proposed approach ensures that it remains practical, aligned with industry and municipal realities, and accomplishes its desired outcome to build to the highest standard — without wasting time or money.

Should you require further information or wish to discuss the implementation of OPSS.MUNI in greater detail, please do not hesitate to contact me at [raly@tarba.org](mailto:raly@tarba.org) or 416-937-7302.

Sincerely,



Raly Chakarova  
Executive Director