



GTSWCA
Greater Toronto Sewer & Watermain
Contractors Association

TARBA Toronto and Area
Road Builders
Association

HCAT
HEAVY CONSTRUCTION ASSOCIATION OF TORONTO



February 5, 2026

Sent via email to: Avi.Bachar@toronto.ca

Avi Bachar
Director, Engineering Support Services, EC&S
City of Toronto
55 John Street – Metro Hall (20th Floor)
Toronto, ON M5V 3C6

Re: Proposal to Prohibit Gasoline- and Diesel-Powered Generators for Site Offices on City of Toronto Projects

Dear Mr. Bachar,

Thank you for your letter and the opportunity to respond to this proposal to prohibit gas- and diesel-powered generators for project site trailers in the City of Toronto.

We understand and can respect why this is being considered, but we wish to reiterate the strong concerns that we have previously raised about this proposal, including:

- The change would effectively require contractors working on projects in the City to invest in entirely new equipment and fuel sources, regardless of whether they already own equipment that is specifically designed for this purpose;
- It would impose an additional barrier to entry for small and medium-sized contractors who may not have the capital resources to replace otherwise functional and compliant equipment; and,
- It is likely to result in significant administrative delays that will affect the timely delivery of projects.

Aside from these primary concerns, we also have an issue with the timing of this proposal. These site trailers require reliable heating and power, especially in winter months. Imposing this change during the coldest months of the year poses operational and safety risks.



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Evaluation of Alternatives

Upon first learning of this proposed initiative, several contractors explored alternative options for site trailers, and all came to similar conclusions, specifically that alternative energy sources to power trailers are not yet viable options.

- wind and/or solar do not provide a sustainable and reliable energy source, and are subject to increased theft risk;
- batteries of this scale are expensive, heavy, not readily available, and require generators to regularly recharge; and,
- available alternative fuel sources (i.e. propane) require expensive retrofits to existing equipment and can present significant site safety risks and to the public around these sites.

The only safe and reliable energy source identified in this review outside of the current set up, is direct hook-up to Toronto Hydro. The main concern with this approach, however, is that from initial identification to actual hook-up can often take months, which would delay the onset of projects and would not be administratively or financially efficient on shorter-term or mobile sites.

We believe there are approaches that can be employed to truncate this timeline, such as having the City provide site trailers, allowing their placement, certification, and hookup to take place during the project tendering phase. This would greatly reduce the delays that would otherwise occur after project award; would meet the City's climate goals; and would address the noise, odour, and emissions issues that have been cited as concerns.

Alternatively, the City could identify the location for site trailers on the project drawings and, work with Toronto Hydro in advance to pre-approve and 'fast-track' hookups for site trailers. Under these conditions, contractors could use generators only as long as necessary to have trailers hooked up and certified.

Our Recommendation

We recognize and appreciate the environmental intent behind the proposal. We think there is merit to this over a longer-term horizon, however we believe the current plan presents more challenges than benefits. We recommend that the City reconsider the proposal at this time and instead engage directly with a broad cross-section of contractors that bid on City projects to better understand the full implications of this



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policy. While we appreciate that the City may have already consulted with suppliers of alternative equipment, we would suggest that they alone may not provide fully objective input, given their vested interest in such a change.

As always, we are all willing to meet to discuss this issue to help find a reasonable solution. Thank you for the opportunity to respond.

Sincerely,

Patrick McManus
Executive Director, GTSWCA

Richard Lyall
President, RESCON

Peter Smith
Executive Director,
HCAT

Raly Chakarova
Executive Director, TARBA

Andrew Pariser
Chair, ORCCA

Nadia Todorova
Executive Director,
RCCAO

Steven Crombie
Senior Director,
Public Affairs

Cc: Her Worship, Mayor Olivia Chow;
City of Toronto Infrastructure and Environment Committee