



April 4, 2025

Hon. Stephen Crawford  
Minister of Public and Business Service Delivery and Procurement  
Government of Ontario  
777 Bay Street, 5<sup>th</sup> Floor  
Toronto, Ontario M7A2J3

*Sent electronically*

Dear Minister Crawford:

On behalf of the Residential and Civil Construction Alliance of Ontario (RCCAO), we would like to extend our sincere congratulations on your re-election and re-appointment to Cabinet as Minister of Public and Business Service Delivery and Procurement.

As you know, RCCAO is a unique alliance composed of management and labour groups that represents a wide spectrum of the Ontario construction industry. RCCAO's goal is to work in cooperation with government and related stakeholders to offer realistic solutions to a variety of challenges facing the construction industry and which also have wider societal benefits.

Our membership includes the Greater Toronto Sewer and Watermain Contractors Association; Heavy Construction Association of Toronto; International Union of Operating Engineers, Local 793; Joint Residential Construction Association; LiUNA Local 183; Ontario Association of Foundation Specialists; Ontario Formwork Association; and Toronto and Area Road Builders Association.

RCCAO wants to commend the work you and your government have accomplished to date. The Ontario Government's continued commitment to investing in critical infrastructure is key to meeting the needs of our growing province. That investment, coupled with the meaningful advancement on Highway 413 and the Bradford Bypass, reflects your forward-thinking vision that led RCCAO to endorse the party.

A key element of infrastructure and construction projects, particularly in the civil and residential sectors, is the timely delivery of utility locates. Locate requests are overseen through the One Call System, which is a mandatory system under the *Ontario Underground Infrastructure Notification System Act, 2012*. The system allows homeowners, construction contractors, developers, builders and other excavators to make one locate request to a call centre instead of the previous practice of separate calls to each of the utilities.

The timely predictability of locates delivery is of paramount importance, particularly given the significant financial, workforce, and social implications of late delivery locates. Although some improvements to the system have taken place over the last 18 months,

there are still many elements of the locate process that require attention and regulatory streamlining.

One such element is eliminating the need for duplicative locate requests on non-linear excavation sites. RCCAO was encouraged by [consultations](#) that Ontario One Call and the Government of Ontario held in the summer of 2024 on this issue. Given the [stakeholder consensus](#) during the consultations and in subsequent written submissions, we expect this policy to come into effect this year.

This is precisely the kind of duplicative red tape the government should be working to eliminate. Eliminating duplicative locate requests on non-linear excavation sites will significantly enhance efficiency within the locate delivery system and reduce the overall volume of locates.

Currently, companies undertaking long-term, vertical excavation projects are required to request and receive additional locates every 60 days. However, once excavation reaches a certain depth, these additional locates become redundant. We support the proposed policy to eliminate this requirement, stipulating that a new locate is only needed after all utilities have been exposed and the excavation depth is one metre below the invert of the lowest utility.

RCCAO has consistently emphasized that reducing the overall volume of locates in the system is essential to ensuring their timely and predictable delivery. Addressing unnecessary relocations on deep excavation projects is a critical step toward achieving this goal, and it is an initiative we have steadfastly championed. Timely and reliable locate delivery is fundamental to enabling our members to focus on what they do best — building and maintaining the critical infrastructure that supports all Ontarians.

We look forward to working with you in your new portfolio. We would welcome the opportunity to meet with you as we continue our partnership and collaboration with your ministry to work together to build a stronger, more connected Ontario.

Sincerely,



Nadia Todorova  
Executive Director



Copy to:

Kai Nademi, Chief of Staff, Minister's Office, Ministry of Public and Business Service Delivery and Procurement

Jordan Adair, Director of Policy, Minister's Office, Ministry of Public and Business Service Delivery and Procurement

Alex Piccini, Director of Stakeholder Relations, Minister's Office, Ministry of Public and Business Service Delivery and Procurement

Maaz Ali, Manager of Caucus and Stakeholder Relations, Minister's Office, Ministry of Public and Business Service Delivery and Procurement