



RESIDENTIAL AND
CIVIL
CONSTRUCTION
ALLIANCE OF
ONTARIO

Constructing Ontario's Future

September 25, 2023

Hon. Todd McCarthy
Minister of Public and Business Service Delivery
Government of Ontario
College Park, 5th Flr.,
777 Bay Street
Toronto, ON M7A 2J3

Sent electronically

Dear Minister McCarthy:

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

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 Formwork Association; and Toronto and Area Road Builders Association.

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.

Ontario has a legislated deadline of five business days for a response to locate requests. Unfortunately, industry has faced chronic issues in terms of long days for utility companies to provide markings of where their underground services are located. It is estimated that 85 percent of locate requests are late. Without receiving these locates, most of the work on site cannot proceed, which results in significant financial consequences and project timeline delays.

Given the importance of timely underground utility locates to the infrastructure industry, RCCAO was delighted by the Ontario Government's new changes introduced in Bill 93, *Getting Ontario Connected Act*, which bring regulatory reforms to the Ontario One Call utility locates system. This legislation is an important step toward meaningful improvements to a system that has caused considerable difficulties for the infrastructure and construction industry. These crucial reforms will help address the current lack of timely locate responses, remove duplicative system requirements and alleviate the costly delays that hold up construction projects.



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As work continues on this critical infrastructure file, RCCAO will continue to advocate for an expedited regulatory process to reduce costly delays and ensure safety across construction sites for workers and the community alike. Despite the improvements contained in Bill 93, there are still elements of the underground utility locates process that can be refined, such as eliminating the need for relocations on nonlinear excavation construction sites below a certain depth.

Additionally, industry is looking forward to government's direction on charging for locates. Industry's position remains firm that charging for locates and relocations would have unintended consequences throughout the construction industry and beyond. This would represent a seismic shift to current, long-standing practices and would make Ontario an outlier to every other jurisdiction in North America.

We urge the Ontario Government to expedite the process to move forward with this important initiative as quickly as possible to avoid costly delays. RCCAO members are ready to work to build critical infrastructure and housing to realize the prosperous future for the people of Ontario. We would appreciate the opportunity to meet you at your earliest convenience to discuss our continued collaboration.

Sincerely,

Nadia Todorova
Executive Director

Copy to:

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Jordan Adair, Senior Policy Advisor, Minister's Office, Public and Business Service Delivery