



May 18, 2026

EA Modernization Project Team
Environmental Assessment Modernization Branch
135 St Clair Ave West, 4th Floor
Toronto, ON M4V 1P5

Submitted electronically

RE: ERO 026-0415: Proposed Environmental Assessment Act amendments to improve the comprehensive environmental assessment process

The Residential and Civil Construction Alliance of Ontario (RCCAO) appreciates the opportunity to provide comments on these proposed amendments to the *Environmental Assessment Act*.

RCCAO is an alliance of key labour and management stakeholders from the residential and civil construction sector. RCCAO's members build the critical infrastructure that all Ontarians rely on. 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; Ontario Association of Foundation Specialists; and the Toronto and Area Road Builders Association.

RCCAO welcomes and supports the Government of Ontario's continued focus on critical infrastructure and ensuring that the provincial regulatory landscape facilitates the construction of more homes and infrastructure assets. We commend the province's consistent efforts and objectives to modernize and streamline the environmental assessment (EA) processes where unnecessary duplication, administrative delays and/or outdated procedures no longer serve the public interest.

For too long, the MCEAs have been a scattershot process that have been a significant driver of procurement costs in Ontario. This has led to regulatory duplications, project delays with no discernible benefit, and impeded the ability to build and maintain critical infrastructure across the province.

RCCAO [research](#) has consistently shown that the MCEA process in Ontario takes too long and costs too much for taxpayers. Given the volume of evidence of the serious implications of the time and cost delays associated with the MCEA process, we are pleased to see the government continue its modernization efforts of the MCEA process.

RCCAO has long been a leading voice in Ontario advocating for reforms to the MCEA process. Our research contains numerous examples of infrastructure projects where the added time and MCEA-related study costs outstrip the capital construction costs of the project itself. Two such examples that illustrate the need for reform are two bridge projects in Caledon:

- A box culvert style bridge that took 2.5 years to build:
 - Capital costs: \$489,000
 - Study costs: \$494,000
- Another box culvert style bridge, going from an existing one-lane to a two-lane (Winston Churchill, Town of Erin):
 - Capital costs: \$600,000 (came in under budget)
 - Study costs: \$1,100,000

The EA process has, for too long, resulted in costly and time-consuming delays for the construction of low-risk municipal infrastructure. It has stifled industry's ability to grow at the pace necessary to keep up with the demand for housing and population growth in the province. Streamlining this process to eliminate the duplication of approvals and to allow projects to proceed as planned by the respective municipalities will go a long way towards remedying this problem

As the Government of Ontario continues to work on this important issue, reforms should continue to reflect several important principles to ensure that process improvements translate into faster project delivery while maintaining public confidence in the EA framework, including: making decision timelines predictable; making decisions transparent and logical; ensuring there is a transition process for existing projects; operating on a risk-based approach; and tracking and reporting on performance.

Ontario requires an approvals system that protects the environment while allowing critical infrastructure to proceed in a timely manner. Modernizing of the *Environmental Assessment Act* can help reduce unnecessary delays and support the Government of Ontario's broader objectives on housing and economic growth.

RCCAO would also like to offer its full support for the submission by the Ontario Sewer and Watermain Construction Association on this issue.

RCCAO appreciates the opportunity to provide comments on this process and would welcome continued dialogue as these reforms advance.

Sincerely,



Nadia Todorova
Executive Director