



**May 23, 2025**

**Hon. Aris Babikian, Chair**

c/o Tanzima Khan  
Standing Committee on the Interior  
Whitney Block, Room 1405  
99 Wellesley Street W  
Toronto, ON M7A 1A2

*Sent electronically*

**RE: Bill 5, *Protect Ontario by Unleashing Our Economy Act, 2025***

Dear Chair Babikian,

The Residential and Civil Construction Alliance of Ontario (RCCAO) is pleased to provide commentary to the Standing Committee on the Interior in support of *Bill 5, Protect Ontario by Unleashing Our Economy Act, 2025*.

RCCAO is an alliance of key labour and management stakeholders in the residential and civil construction sector. Our members build the critical infrastructure that all Ontarians rely on. We aim to work collaboratively with government to offer solutions to the challenges facing the construction industry—challenges that often have broader societal implications.

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 commends the Government of Ontario's continued commitment to facilitating the construction and maintenance of critical infrastructure across the province. This bill aims to accelerate provincial permitting and approvals for key projects, enabling Ontario to build essential infrastructure more efficiently, while maintaining environmental protections for future generations.

The proposed changes to the Environmental Assessment (EA) process are particularly important, as they address longstanding issues with Ontario's Municipal Class Environmental Assessment (MCEA) process. The MCEA is intended to streamline approvals for municipal infrastructure projects, serving as an alternative to the more comprehensive individual EA process required under the Environmental Assessment Act. It is widely used for core municipal infrastructure such as roads, water systems, sewer systems, and bridges.

However, RCCAO's [commissioned research](#) has consistently shown that, despite its intent, the MCEA process often results in significant delays and excessive costs for standard municipal projects, such as road reconstructions, bridge rehabilitations, and flood-control initiatives.



Our 2010 study of 99 projects found that the MCEA process took an average of 19 months and cost municipalities approximately \$113,300 per project. A follow-up study in 2014 revealed that these figures had increased to nearly 27 months and an average study cost of \$386,500.

Our 2019 analysis further demonstrated escalating time and cost burdens. Among 12 comprehensive case studies, nine projects experienced delays of two to five years. Six of the 11 projects reported consultant and reporting costs exceeding \$500,000, and in four of these, costs surpassed \$2 million.

In some cases, MCEA study costs have exceeded actual construction costs. For example, a box-culvert bridge in Ennis took 2.5 years to complete, with construction costs of \$489,000. Similarly, in the Town of Erin, a culvert bridge expansion from one lane to two was completed under budget at just under \$600,000, but the related studies cost \$1.1 million.

RCCAO welcomes the government's efforts to modernize and streamline Ontario's municipal environmental assessment process. We are encouraged that the government recognizes the serious implications of time and cost delays and is working toward meaningful reform.

We support the proposed legislative changes as they aim to eliminate duplicative and costly delays while safeguarding Ontario's environmental landscape. Environmental assessments are indispensable for evaluating the potential impacts of proposed developments. By establishing clear and focused assessment requirements, the legislation not only streamlines administrative processes but also enhances transparency and accountability in decision-making.

RCCAO commends the Government of Ontario for prioritizing critical infrastructure and implementing long-overdue legislative and regulatory changes. We appreciate the opportunity to provide commentary and look forward to continuing our collaboration with the Government of Ontario.

**Sincerely,**

A handwritten signature in black ink, appearing to read 'Nadia Todorova', is positioned below the 'Sincerely,' text. The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Nadia Todorova  
Executive Director  
Residential and Civil Construction Alliance of Ontario