

September 4, 2025

Bruce Cane  
Director, Standards and Contract Branch  
Ontario Ministry of Transportation

Katie De Palma  
Director, Transportation Policy Branch  
Ontario Ministry of Transportation

*Sent electronically*

Dear Mr. Cane and Ms. De Palma:

**RE: Development of a framework to standardize road building specifications and design across the province through the OPPS**

Thank you for the opportunity for the Residential and Civil Construction Alliance of Ontario (RCCAO) to provide recommendations on this important industry issue to you and your team on August 27. Further to those comments, I wanted to provide RCCAO's support and endorsement of the commentary submitted by the Toronto and Area Road Builders Association (TARBA) on this matter and our support for standardization through OPSS.MUNI (Appendix).

As a unique organization that represents both labour and management stakeholders from the residential and civil construction sectors of Ontario, RCCAO believes the principles highlighted by TARBA in their submission are necessary to ensure capital construction dollars go further, speed up project design and delivery, and improve quality, performance and sustainability.

RCCAO supports the government's efforts to standardize specifications, address current fragmentation, inefficiencies and quality variability. Cutting red tape and uncertainty reduces risk and waste, boosting productivity and competitiveness, especially for small and medium-sized businesses, and creating a more level playing field.

RCCAO appreciates the comprehensive work and planning that the Ministry of Transportation has undertaken on this matter and looks forward to engaging with the Ministry and Government of Ontario as work on this initiative continues.

Regards,



Nadia Todorova  
Executive Director

August 26, 2025

Bruce Cane  
Director, Standards and Contract Branch  
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Director, Transportation Policy Branch  
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Sent via email to [Katie.DePalma@ontario.ca](mailto:Katie.DePalma@ontario.ca) and [Bruce.Cane@ontario.ca](mailto:Bruce.Cane@ontario.ca)

Dear Mr. Cane & Ms. De Palma,

**RE: Development of a framework to standardize road building specifications and design across the province through the OPSS**

The Toronto and Area Road Builders Association (TARBA) is the collective bargaining agent for more than 180 unionized contractors in the Greater Toronto Area (GTA) and Simcoe County that build and maintain transportation infrastructure for both public and private project owners.

We're writing in support of standardizing road building specifications, design and procurement across Ontario through the existing Ontario Provincial Standard Specification (OPSS.PROV and OPSS.MUNI). The construction industry is united in its opinion that the standardization of both procurement and road-building standards at the municipal level will make capital construction dollars go further, speed up project design and delivery, and improve quality, performance, and sustainability.

**CURRENT CONTEXT:**

Municipalities in Ontario are responsible for the design, construction, and maintenance of the majority of the province's transportation infrastructure assets. Due to the diversity in municipal size, budget, and technical capacity, there's a wide range of specifications and procurement practices across the 444 jurisdictions. This variance results in inconsistencies that can affect project quality, cost-efficiency, and building and design timelines. This is especially true in the GTA, where suppliers and contractors serve multiple municipal and regional markets that, for example, collectively require more than 300 asphalt mix designs for road construction projects. An upcoming report from CANCEA shows that harmonizing asphalt mix-design standards in the GTA alone can unlock nearly \$1 billion in value over the next decade. And this is just one of many examples that can be realized through standardizing specifications.

The OPSS.MUNI standard was developed to provide a comprehensive and uniform framework for municipal road construction and procurement practices. It establishes clear, consistent technical requirements for material use, construction methods, quality control processes, and general conditions of contract aligned with best practices and provincial guidelines.

These standards are jointly developed and managed by the Ontario Ministry of Transportation, the Municipal Engineering Association, and representatives from industry. The established, long-standing process leverages Ministry expertise, municipal representation for local considerations, and industry practical experience, and has been proven by consistently well-built, cost-effective, safe, and dependable highways, roads, sewers, watermains, and many other types of infrastructure in the province. Any changes to the standards are measured, deliver the desired benefits without unintended consequences, and are implemented with realistic timelines.

Currently, the use of OPSS.MUNI is not mandatory, and municipalities have discretion in adopting these standards, modifying them, or creating their own. Unfortunately, OPSS specifications and drawings have not been widely adopted among municipalities in Ontario. Municipalities have created stricter “supplementary specifications”, a long list of exceptions, or bypassed OPSS.MUNI, fragmenting consistency and amassing hundreds of different specifications across the province. Municipalities can quickly change their own standards without any consultation, simply issuing a notice to industry that can impact production, design, build, and performance.

## **BENEFITS OF STANDARDIZATION THROUGH OPS:**

1. **Cost Savings and Efficiency:** Varying standards require different equipment, materials, and testing. This can significantly inflate costs for public project owners and taxpayers, as well as provincial agencies like Metrolinx that build capital projects in different municipalities. Standardized specifications enable economies of scale, including bulk procurement, more competitive bidding, and reduced administrative overhead. With a common standard, suppliers and contractors, especially those serving multiple municipal markets, can plan around a known set of requirements, reducing design, material, and building variability. A common standard can help municipalities optimize budget expenditures while ensuring transparency and fairness in contractor selection. A competitive bidding environment that awards the lowest qualified bid will help ensure that these realized savings are passed down to municipalities and taxpayers.
2. **Faster Project Delivery:** Pre-vetted, province-wide standards reduce time spent on specification development, review, and contractor familiarization. Standardized testing and inspection protocols allow for quicker approvals, less back-and-forth between the project stakeholders, fewer disputes, and ultimately faster completion of projects. Reduced construction delays also mean less disruption to local businesses and residents.

- 3. Consistency in Quality and Safety:** Local variations in specifications often lead to inconsistent pavement thicknesses, materials, and testing procedures — which can compromise road safety and longevity of the new infrastructure asset. With a common provincial benchmark, every municipality builds to the same safety, durability, and performance standards. Predictable road performance means fewer potholes, less costly emergency repairs, and safer travel for the public. OPSS is based on best practices and proven methods, ensuring that municipalities are using the most effective and efficient approaches to construction.
- 4. Streamlined Project Management:** Clear, consistent specifications simplify project planning, contract administration, and oversight, thereby reducing delays and minimizing disputes between municipalities, contractors, and suppliers. Municipal-specific specs often require custom contract drafting, more consultant time, and extended review periods, prolonging timelines and inflating costs. OPSS offers clear, pre-agreed technical language, reducing legal disputes, clarifications, and change orders.
- 5. Sustainability:** Provincial alignment supports sustainable construction practices. OPSS 1010.MUNI, for instance, aligns municipal practices with the use of [recycled crushed aggregates](#) in transportation projects that can significantly reduce carbon emissions, landfill use, and extend the life of existing pits and quarries.

## **BARRIERS & SOLUTIONS:**

Below are the main concerns that some municipalities may raise with standardization, which may require additional resources and capacity in the short term, but ultimately should not be barriers to standardization and the long-term benefits that will bring.

- 1. Transition/Implementation Costs:** For example, some municipalities may still use Marshall mixes in their road construction projects. Superpave mixes, recommended through OPSS, can be more expensive in the short term due to upgraded materials, testing, and quality assurance requirements, however, they typically offer better performance and longer service life, which can reduce lifecycle costs. Higher, consistent quality in construction reduces long-term maintenance and taxpayer costs.
- 2. Local Capacity:** Some municipalities already rely heavily on consultants because they lack in-house engineering staff. A standardized, more detailed OPSS.MUNI would give them an out-of-the-box set of specs vetted by the province and larger peers, so they get the same quality baseline as big cities and can benefit from competitive pricing and long-term performance. To address any testing and quality control costs, municipalities can make independent testing part of the contract requirements, retain a consultant to verify the contractor's results, or regional governments can share access to inspectors, engineering support, and testing labs.

3. **Local Considerations:** For example, Superpave is climate- and traffic-specific, meaning mix designs must be tailored for local conditions. To help address local conditions but still create economies of scale, MTO can allow regional specifications to the OPSS standards based on its existing five regions: Central, Eastern, West, Northeast, and Northwest (a new tier model referenced below).
4. **Quality Concerns:** For example, municipalities change their own standards in response to quality concerns in their local markets, introducing increasingly restrictive specifications, without the supporting analysis by MTO, that create a less competitive bidding environment, increase building costs, and may affect both short-term and long-term performance. Instead, municipalities can address quality concerns by strengthening quality assurance, contractor performance management, prequalification, and enforcement mechanisms *within* the OPSS framework rather than rewriting the technical standard for each jurisdiction. That way, OPSS remains consistent province-wide, but “bad players” are systematically excluded or corrected. The industry supports standardization *and* strong quality control measures.

## GOVERNANCE & IMPLEMENTATION

To strengthen confidence in and adoption of the OPSS.MUNI, the governance framework should be maintained and strengthened with a focus on representation, decision-making processes, and feedback loops. More specifically, we encourage the government to consider:

- A **joint governance board** made up of MTO officials, municipal, and industry representatives that reflects proportional representation and decision-making structure.
- An **evidence-based decision-making process** that includes criteria and rationale for accepting/rejecting changes to the OPSS.MUNI, including field data, pilot projects, and lifecycle cost analysis.
- A predictable **review process** of different OPS sections, ensuring a transparent consultation and decision process that is quality-driven.
- A **tiered model** that consists of the Core Standard (mandatory, consistent across Ontario) and Regional Standards (pre-approved municipal add-ons for local conditions) based on MTO’s existing five regions. This approach would avoid municipalities issuing their own standalone supplementary specs and allow flexibility while maintaining consistency. It would also support smaller municipalities with limited engineering capacity since they can rely on pre-approved standards instead of inventing their own specs.

We recommend a phased-in approach that will prioritize high-impact, high-cost areas of fragmentation. Initially, we believe that this process should focus on **material use and general conditions of contract**, which should be non-negotiable and part of the Core Standard. **Asphalt mix-designs** is also a priority, as it would provide a valuable “proof

of concept” on the cost savings and efficiency piece. This can be part of the Regional Standards – developing a limited number of regional asphalt mixes that reflect local road use and climates. Specifically, we recommend starting with the following OPSS sections: 1010, 100, 310, 1003, 1101, 1150, and 1151.

For municipalities to introduce local customizations outside of the OPSS.MUNI, they must be justified by evidence and submitted in advance to the governing body for review and approval. This would help address local concerns and ensure innovation doesn’t stay siloed, but rather evaluated and scaled up province-wide as part of the Core or Regional standards.

OPSS.PROV and OPSS.MUNI are intentionally designed to address differences in ownership, maintenance, traffic levels, and performance needs, to name a few. They should be kept separate, with the focus of standardization at the municipal level rightly staying on the OPSS.MUNI.

Lastly, if not legislated, the provincial government, in partnership with the federal government, should make its financial support for municipalities' transportation capital projects contingent on using the OPSS to encourage municipal adoption of the OPSS.MUNI.

In summary, letting each municipality set its own road-building standards creates fragmentation, inefficiencies, and quality variability. By adopting OPSS.MUNI, municipalities will benefit from uniform standards that simplify tendering, streamline processes and reduce duplication, improve quality, sustainability, and safety, *and* lower costs. Cutting red tape and uncertainty reduces risk and waste, boosting productivity and competitiveness, especially for small and medium-sized businesses, and creating a more level playing field.

Despite some upfront disruption, standardization streamlines processes, ensures predictable outcomes, and delivers safer, more cost-effective infrastructure across Ontario — which is in the public’s best interest.

Should you require further information or wish to discuss the implementation of OPSS in greater detail, please do not hesitate to contact me at [raly@tarba.org](mailto:raly@tarba.org) or 416-937-7302.

Sincerely,



Raly Chakarova  
Executive Director