



November 23, 2019

Environmental Registry of Ontario

Proposal Regarding New Regulation for Vehicle Emissions

ERO number 013-3867 posted October 9, 2019

ERO number 019-0416 Posted October 9, 2019

Comments by Ontario School Bus Association (OSBA)

The OSBA appreciates the government's effort to clarify and strengthen on-road vehicle emissions requirements and set out rules around the testing of emissions from heavy diesel commercial motor vehicles.

Our comments relate in part to the decision posting on October 9, 2019, "Redesigning Ontario's Drive Clean Motor Vehicle Emissions Testing Program" (ERO 013-3867) that sets the agenda for the regulation proposed in ERO 019-0416. Several proposals discussed in ERO 013-3867 are not dealt with in the proposed regulation but are being commented on as they are likely to guide future development.

OSBA submits the following comments.

1. In section 2 with regard to an integrated inspection program, the proposal states that, "Alignment to the Ministry of Transportation's Periodic Mandatory Commercial Vehicle Inspection requirement for vehicle test age and test frequency. As trucks are only required to undergo a periodic mandatory inspection every 12 months, emission tests would be done at that same frequency. It would therefore be reasonable that buses and accessible vehicles, at most, undergo an emissions test at the annual frequency and not be required to undergo an emissions test at the 6-month frequency required for periodic mandatory safety inspections for these types of vehicles. The rationale being that the two vehicle types have similar engines and emission control systems and therefore there is no need to test buses and accessible vehicles at twice the frequency of trucks.
2. OSBA looks forward to further discussing the requirements and procedures for the integrated inspection program. In particular, OSBA is interested in exploring a provision within the integrated testing program which would allow Motor Vehicle Inspection Stations licenced by the Ministry of Transportation to carry on providing safety inspection services without the need to offer emission testing services. In addition, OSBA will want to explore options around mobile emissions testing services for Motor Vehicle Inspection Stations. The combination of these two provisions would allow many small fleet operators, which are very common in the student transportation industry, to continue with school bus and school purpose vehicle safety inspections without the need to have the equipment and staff to conduct emissions testing, which could be provided by a mobile service.

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3. We anticipate that the exemption for smoke opacity emissions testing for vehicles 6 years of age or newer, as is the current rule, and as stated as a proposed policy objective in ERO 013-3867 will be maintained.

Thank you for your consideration in these matters. Should you wish to discuss these matters further, please feel free to contact me.

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