

Good Roads

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**Modernizing Ontario's Vehicle Inspection
Program and Integrating Safety and
Emissions Testing for Commercial Vehicles**

Ontario Regulatory Registry Submission

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About Us

Good Roads is a municipal association concerned with the advancement of roads and other infrastructure in Ontario. Based in Oakville, Ontario, we have been devoted to the cause of better roads since 1894. Originally known as the Ontario Good Roads Association (and still using that name corporately), we have more than 450 member governments, including most of Ontario's municipalities and a growing number of First Nations, as well as dozens of affiliated corporate members in the transportation and infrastructure sectors. Our purpose, in part, is to connect our members to each other, to other levels of government, and to relevant companies in the private sector. Our members look to us for training, knowledge, political advocacy, and answers to their most pressing problems. Good Roads is resolutely independent.

For more information visit www.ogra.org.

Introduction

Good Roads would like to thank the Ministry of Transportation (MTO) for taking the time to consult on the changes being made to the commercial motor vehicle inspection program. While our members are generally in favour of these changes which would help modernize the process, there are some serious concerns that must be raised. The Good Roads Board of Directors passed a resolution at its September meeting to address these concerns.

Concerns

The analysis of the regulatory impact posted on the Ontario Regulatory Registry states that government stations which were previously exempt from paying for inspection certificate fees will now be required to purchase them. The argument being made is that such a change will “create a level playing field across all sectors.” Such an argument fails to recognize the unique nature of the municipal sector, especially when compared to other commercial motor vehicle operators.

Municipalities do not exist to turn a profit; rather, their purpose is to provide services to their residents. They are unable to run operating deficits so when budget pressures emerge, they must either cut services or raise taxes. It is not in the public’s interest to reduce the number of vehicles in a municipal fleet, especially when such vehicles are used for road and winter maintenance activities as this could jeopardize public safety. Conversely, raising taxes at a time when the economic recovery is so fragile is also a non-starter for residents, businesses, and councils across the province.

MTO has not yet confirmed what the inspection certificate fees will be. Under the current regime, these fees are in excess of \$100/unit. For a municipality the size of the City of Pickering, this would amount to approximately \$20,000 per year in inspection certificates and fees. Furthermore, the new program requires specific equipment be purchased. If a municipality were to purchase only one of each piece of equipment, this would amount to approximately \$7000.

While the municipal sector is in favour of modernizing the commercial motor vehicle inspection regime, the costs should certainly not be borne by it. Below, are the recommendations of the Good Roads Board of Directors.

Recommendation

The Good Roads Board of Directors has passed a resolution requesting that the Ministry of Transportation withdraw the new requirement to “level the playing field” by having municipalities pay for inspection certificate fees as a result of the unique nature of municipalities when compared to other commercial vehicle operators.

The Good Roads Board of Directors has also requested that a one-time subsidy be created to offset the costs of purchasing the equipment required to participate in this new program.