

October 19, 2021

Katerina Downard
Ministry of Transportation, Environmental Policy Officer
777 Bay Street, Suite 700
Toronto, ON
M7A 2J8

Dear Katerina Downard,

Re: Modernizing Ontario's Vehicle Inspection Program & Integrating Safety and Emissions Inspections for Commercial Vehicles

On behalf of the Ontario Waste Management Association (OWMA), I am writing to request an amendment due to unintended detrimental effects made permissible by the proposed changes to the *Highway Traffic Act* to support a new vehicle inspection program.

The OWMA applauds the Ministry of Transportation's goals to enhance road safety and to implement an efficient and modernized digital program. However, in practice, certain elements of the program will cause detrimental operational issues and have serious cost consequences.

The OWMA is requesting an amendment to allow for license renewals to be spread throughout the year rather than all in one month under the current system to facilitate the new plans to simultaneously perform annual vehicle safety, emissions tests, and licensing, due to extreme operational obstacles and costs that will likely force out small inspection stations.

Combination of Annual Safety, Emissions Tests, and License Renewal Causes Extreme Operational Obstacles for Fleets

The new program combines annual safety, emissions testing, and license renewal together. In practice, this is detrimental as it is a practical impossibility to safety an entire fleet in one month. Under the current program, annual vehicle inspections are performed throughout the year providing enough time for thorough inspections and utilization of all resources efficiently. Emission testing typically only requires half the fleet to be tested on any given year, which allowed for some vehicles to continue operations while others were undergoing testing. Emission testing is also commonly performed by third party mobile units with the specialized equipment and training to perform that work. Lastly licensing, currently happens once per year in a given month.

For certain industries, such as waste management, fleets need to be on the road regularly and during the day. For waste management fleets, it is not possible to rent trucks as needed while safety tests are being conducted to ensure materials are still being collected. If smaller shops cannot afford the new investment and training required to maintain their inspection license, they will become increasingly reliant on larger shops. To remain in compliance, these smaller inspection stations will have to send all their trucks offsite to larger inspection stations, adding more costs. Inevitably, as the large shop demand increases it will be difficult to get a slot to get the inspection done after hours. This will ultimately severely harm and halt operations for any fleet.

Extreme Costs for Smaller Inspection Stations under the New Program

Under the new program, smaller inspection stations such as those in smaller fleets will have difficulties with new costs associated with specialized tablets, additional emissions testing equipment, and additional training needed for data collection and other requirements. Adding the requirement on top of this that all trucks must be tested in a month will cause operational stops and further extreme costs. Considerations should be given to continue the availability of third-party mobile emission testing services to support smaller inspections stations and fleets.

OWMA supports and appreciates the safety considerations of the new program, but to ensure that operation can continue safely and efficiently, at the very least the license renewal process needs to change to allow for renewals to be spread throughout the year.

Thank you for your consideration and time. I can be reached at mchopowick@owma.org to schedule a discussion with you and your staff to provide further details and information.

Sincerely,



Mike Chopowick
Chief Executive Officer