

November 5, 2021

Ms. Katerina Downard
Environmental Policy Office
Ontario Ministry of Transportation
777 Bay Street, Suite 700
Toronto, ON M7A 2J8

Dear Ms. Downard:

Subject: ERO 019-4277: Modernizing Ontario's Vehicle Inspection Program & integrating safety and emissions inspections for commercial vehicles

Stellantis (FCA Canada Inc.) appreciates the opportunity to review and comment on the proposal to Modernize Ontario's Vehicle Inspection Program and integrating safety and emissions inspections for commercial vehicles.

We note that the proposal will introduce new regulatory requirements for the Vehicle Inspection Program and that vehicle safety and emission standards will be integrated. We also note that the on-road emission standards will be moved from the Environmental Protection Act (EPA) to the Highway Traffic Act (HTA).

We met with the Ministry of Environment through the Company in March of 2020, and most recently in a joint meeting with the Ministry of Transportation and Ministry of Environment, Conservation and Parks on November 2, 2021 to review our concerns and understandings of the proposed changes. Based on these discussions, we would like to reiterate our understandings to ensure that integration of the vehicle safety and emission inspections will continue to allow the flexibility in timing to conduct these as separate inspections for the purpose of the combined annual inspection requirements. FCA Transport (FCAT) owns and operates a substantial number of transport vehicles (nearing 100 units) that are critical to the just in time support required for FCA Canada business and manufacturing operations. FCAT is also registered to conduct the preventative maintenance and safety inspections on its transport vehicles. These inspections are evenly staggered throughout the year to minimize disruption to the transport services FCAT provides. We are of the understanding that new vehicles purchased and operated by FCAT will be exempt from opacity emission tests until they reach 7 years. We also understand that the proposed vehicle emission component inspections can be completed during the safety inspections.

As well, the current FCAT practice includes emission testing conducted through contracted mobile emission test services and these tests are usually batch tested only a few times per year on weekends when the transport or other support vehicles are not in use in order to minimize any impact on FCAT transportation and logistics support. The time between vehicle safety inspection and emission testing for an individual vehicle can range from a few weeks to many months, possibly 9 months or more, depending on scheduling and vehicle use logistics. This long-established practice of separate vehicle safety inspection and emission testing has provided an optimal solution that has been critical in maintaining compliance while avoiding incremental costs and significant disruptions to FCAT transportation services. We are of the understanding that the emission tests are valid for a one-year period and that the required safety inspection can be performed anytime within that valid timeframe in order to satisfy the requirements.



We are appreciative of your time to consult with us and are pleased to learn that the Ministry of Transport will continue to allow for the separate vehicle safety and emission testing procedures that will satisfy the requirements of the combined annual vehicle inspection requirements. We ask that the language in the regulation reflect our understanding in further detail.

We trust that our comments will be considered in this modernization effort. Should you wish to discuss this further, please do not hesitate to call me at 519-973-2722.

Yours very truly,

FCA Canada Inc.

A handwritten signature in blue ink that reads 'Larry Robertson'. The signature is written in a cursive style and is positioned above the printed name and title.

Larry A. Robertson, P.Eng.
Manager, Vehicle Environmental and Energy

cc: J. Elliott, MTO
T. Gavin, MECP
G. Gillespie, MECP