

April 24, 2023

The Hon. Kaleed Rasheed  
Minister of Public and Business Service Delivery  
College Park 5<sup>th</sup> Floor  
777 Bay St, Toronto ON M7A 2J3

**Re: Supporting Ontario contractors and infrastructure builds by advancing the modernization of the locate services industry**

Dear Minister Rasheed:

For more than a century, the Ontario Chamber of Commerce (OCC) has supported economic growth in Ontario by advocating for business priorities at Queen's Park on behalf of our 60,000 members, including local chambers of commerce and boards of trades in over 157 communities.

With insights from our [Infrastructure Policy Council](#) and [Energy Policy Council](#), we are writing to offer solutions to help address the backlog of locate requests, which is an essential requisite for new and existing infrastructure builds and expansions across Ontario.

As your ministry is aware, a locate request must be submitted to Ontario One Call for any activity that involves breaking ground, including the construction or repair of buried infrastructure, excavations, and the installation of buried fiber optic cables. While we recognize Bill 93 and your government's ongoing efforts to modernize Ontario One Call, additional steps must be taken as many contractors and developers continue to face long wait times for a locator to begin the initial assessment that would allow the dig to move ahead. These longer wait times have resulted in significant project delays.

The backlog of locate requests is especially challenging in Northern Ontario, where there is already a limited window of opportunity to complete critical infrastructure projects given the short summer construction season. As such, it jeopardizes the government's ability to deliver on priority projects, including its mandate of province-wide broadband connectivity by 2025.

The backlog has compounded growing barriers to completing projects on time, including labour shortages, supply chain disruptions, and permitting and planning delays. Together, these challenges result in significant financial burdens for businesses, impact project outcomes, and hinder a community's ability to attract new investments in the future.

In short, we urge your ministry to continue working with Ontario One Call to support the modernization of the locate services and excavation industries. In particular, we encourage you to:

- Consider how innovative approaches such as the expansion of a Dedicated Locator model and industry partnerships would help drive the necessary incremental investments in human resources, training, and capital that utilities require now to assist in moving projects forward.
- Further clarify and provide assurances around cost recovery and liabilities that extend beyond Ontario One Call enforcement of the new Administrative Monetary Penalty System.
- Continue working with the business community at large to raise awareness of recent regulatory changes and explore other tools to help the industry address late locates.
- Explore ways in which adaptive and innovative technology can further expedite infrastructure projects, including the use of augmented reality and algorithmic-based response systems, such as the one recently implemented by the City of Burnaby, British Columbia.
- Work with Ontario One Call and industry stakeholders to incentivize and invest in workforce development strategies that attract and retain skilled locators throughout Ontario.
- Work with industry stakeholders to identify and close gaps in the quality and accuracy of infrastructure location data.

We look forward to working with your government as it continues to deliver critical infrastructure across Ontario and welcome the opportunity to discuss this matter further.

Sincerely,



Rocco Rossi  
*President and CEO*  
*Ontario Chamber of Commerce*

**CC:**

Hon. Kinga Surma, Minister of Infrastructure, Government of Ontario

Hon. Todd Smith, Minister of Energy, Government of Ontario

Carlene Alexander, Deputy Minister, Ministry of Infrastructure, Government of Ontario

Renu Kulendran, Deputy Minister, Ministry of Public and Business Service Delivery, Government of Ontario

Jason Fitzsimmons, Deputy Minister, Ministry of Energy, Government of Ontario

Brian Riddell, Parliamentary Assistant, Minister of Public and Business Service Delivery,  
Government of Ontario

Sheref Sabaway, Parliamentary Assistant, Minister of Public and Business Service Delivery,  
Government of Ontario

Stéphane Sarrazin, Parliamentary Assistant, Minister of Energy, Government of Ontario

Amarjot Sandhu, Parliamentary Assistant, Minister of Infrastructure, Government of Ontario

Vijay Thanigasalam, Parliamentary Assistant, Minister of Infrastructure, Government of Ontario

Patrick Sackville, Chief of Staff, Office of the Premier of Ontario