



Ontario
Home Builders'
Association

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November 22, 2022

Ministry of Public and Business Service Delivery
Public Safety and Operations Policy Branch
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Proposal Number: 22-MGCS020

RE: Consultation on an Administrative Penalties Regime for Ontario One Call

The Ontario Home Builders' Association (OHBA)

The Ontario Home Builders' Association (OHBA) is the voice of the residential construction industry in Ontario. OHBA represents over 4,000 members including builders, developers, professional renovators, trade contractors and many others within the residential construction sector.

Comments on the proposed Administrative Penalties Regime for Ontario One Call

Timely and efficient locating of underground infrastructure is critical to ensuring that the residential construction sector can deliver the volume and variety of homes and renovations that Ontarians are counting on. Because utility locates are done at the very beginning of the pre-construction process, significant delays in obtaining locates can extend the construction timeline which adds further uncertainty and costs onto projects. The proposed administrative penalties regime is an important first step towards ensuring utility owners provide timely, efficient, and accurate locate services. The regime should help encourage compliance with the *Ontario Underground Infrastructure Notification System Act*.

Furthermore, the best way to promote compliance from the industry would be to place the emphasis on reducing the time it takes to get locates and extending the time before they expire. As an industry which is dependent on locates to begin the home construction process, OHBA members have a strong understanding of the impact that delayed and inaccurate locates have on the development and new home buying processes.

We thank the Ministry for the opportunity to comment on these proposals. We also recognize that there is still more work to do and OHBA may provide further comments at a later date. We look forward to continuing engaging with the Ministry in order to ensure these proposals are aligned with the goals of improving housing attainability.