

OSPE Submission on Bill 98, Building Homes and Improving Transportation Infrastructure Act, 2026

Submitted to the Standing Committee on Heritage, Infrastructure and Cultural Policy

April 15, 2026

About OSPE

The Ontario Society of Professional Engineers (OSPE) is the advocacy body for Ontario's engineering community, representing over 90,000 licensed professional engineers and engineering graduates across the province.

OSPE welcomes the opportunity to provide comment on *Bill 98, the Building Homes and Improving Transportation Infrastructure Act, 2026*.

OSPE supports Ontario's goals of accelerating housing delivery, reducing costs, and modernizing transit infrastructure. The engineering profession has a direct and critical role in achieving those goals, and OSPE is committed to working constructively with government to ensure the province builds not only faster, but better.

We offer the following technical observations and recommendations to help the Committee ensure Bill 98 delivers sustainable, high-quality outcomes for Ontarians.

Areas of Support

Building Code

Bill 98 proposes a section-by-section review of the Building Code through a new expert advisory body comprising engineering, construction, and Code specialists.

OSPE strongly supports the establishment of a formal, engineering-led expert advisory body to review and modernize the Building Code. This is precisely the kind of evidence-based, profession-led process that produces technically sound, durable regulatory outcomes. OSPE would welcome a formal consultative role in that body for our members.

Transit & Mobility Engineering

OSPE supports the systems-level integration underlying the *Fare Alignment and Seamless Transit Act, 2026* in Bill 98. Engineers understand transit as an interconnected mobility network. Legislative tools that enable fare and service integration across the province are aligned with sound transportation engineering principles, enable more housing, and reduce greenhouse gas emissions.

The ministerial power to set fare structures, designate priority routes, and prescribe service standards will have significant engineering and planning implications. Service standard regulations will drive fleet procurement, station design, maintenance facility sizing, and network capacity planning. Engineering expertise must be embedded in the decision-making process to ensure the policies deliver value to Ontarians.

Fare and transit integration directly supports the housing affordability challenge. Connected mobility networks enable demand dispersion beyond the GTA core, making it viable for residents to live in secondary cities (Hamilton, Barrie, Oshawa) while remaining connected to employment and services. This also disperses spending dollars across the region, strengthening local economies and hospitality, retail, and service sectors in communities outside Toronto.

Finally, a sustainable transportation system is essential to reduce greenhouse gas emissions. OSPE emphasizes engineering expertise be included in the decision-making process to ensure transit policy from Bill 98 leads to efficient mobility networks to encourage adoption.

Recommendations and Comments

Water, Wastewater & Servicing Infrastructure

Bill 98 introduces amendments to the *Water and Wastewater Public Corporations Act, 2025* that enshrine public ownership of water and wastewater assets in legislation and establish a new regulatory framework for communal water and wastewater systems, including a provincial backstop mechanism for systems in financial or operational distress.

In Ontario, the predominant model for wastewater management has been the centralized wastewater treatment (CWWT) facility. The benefits of such facilities in providing cost-effective and efficient sanitation through economies of scale have been enormous. As our communities embrace the need for greater sustainability, infrastructure security, and resilience, OSPE emphasizes Bill 98 may be a time to evaluate and implement, where appropriate, a more local alternative: a distributed network of decentralized wastewater treatment (DWWT) and resource recovery facilities.

Water and wastewater infrastructure is foundational to housing delivery. OSPE also notes that Ontario faces a significant municipal infrastructure deficit. Housing growth accelerated by Bill 98 will increase demand on water and wastewater systems and cannot proceed until such services are in place.

Green Development Standards

Bill 98 proposes to limit municipalities' authority to require enhanced development standards including sustainability and climate-resilience measures beyond the provincial Building Code baseline.

OSPE is concerned that restricting municipal green development standards without first modernizing the provincial Building Code to reflect current climate conditions creates a

performance gap. Engineers understand that designing to minimum standards today frequently results in higher life-cycle costs, larger retrofit costs and greater vulnerability to climate stresses. Restricting municipal authority can create risk if local climate conditions, like flood risk or the Urban Heat Island (UHI) effect, are not reflected in building requirements.

Engineering Oversight & Qualifications-Based Selection

Bill 98 will unlock a large volume of new development and infrastructure investment across Ontario. This creates significant demand for professional engineering services.

OSPE is concerned that the Bill's emphasis on cost reduction and streamlined approvals may create systemic pressure to procure engineering services using lowest price rather than demonstrated competence. This is a well-documented risk in public infrastructure procurement. Lowest-bid selection in engineering consistently produces outcomes that increase project cost through more change orders and remedial work, increased operational and maintenance costs, and more expensive retrofits. The apparent savings at the procurement stage are frequently outweighed by downstream costs over a project's lifecycle.

OSPE has advocated persistently for Qualifications-Based Selection (QBS) as the standard for procuring professional engineering and design services in Ontario. QBS prioritizes technical competence, relevant experience, and demonstrated capacity to deliver before a fair fee is negotiated. Using QBS for public infrastructure projects is the standard in the United States and some Canadian jurisdictions. It has consistently been shown to result in lower project costs and faster construction: [QBS-Executive-Summary-2025.pdf](#)

OSPE recommends a requirement for Qualifications-Based Selection (QBS) for all professional engineering and design services procured in connection with projects enabled or funded under Bill 98, including transit infrastructure, housing-enabling water and wastewater systems, transportation improvements and site servicing.

Conclusion

Consulting the province's engineering community is essential to ensure the projects realized under Bill 98 deliver public value and protect Ontarians. Ontario faces a generational challenge in housing and infrastructure delivery. Meeting that challenge requires speed, and technical rigour to ensure infrastructure built today provides benefits to our communities for decades to come.

OSPE is prepared to provide technical briefings on any of these recommendations and to support the Committee's work through the expertise of our member community. We thank the Committee for the opportunity to contribute to this important legislative process.

Sincerely,



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