

April 15th, 2026

Rozalyn Werner
Executive Director
Ontario Public Buyers Association
850 King Street West, Unit 20, Oshawa Ontario

Sent Electronically
rozalyn@opba.ca

Re: Reducing Administrative Burden in Domestic Supply Chain Requirements for Infrastructure Procurement

Dear Rozalyn,

On behalf of the Ontario Road Builders' Association (ORBA), I am writing to you about the Buy Ontario Procurement Directive. Province of Ontario and the Government of Canada's shared objective to encourage the procurement of Canadian-made goods and services.

ORBA recognizes this policy direction as an acceptable approach to public procurement. Ontario's heavy civil construction sector already operates with a predominantly domestic supply chain on most infrastructure projects. This reflects the localized nature of materials such as aggregates, asphalt, concrete, and labour, which are inherently tied to regional supply and delivery constraints.

As governments move to formalize domestic procurement requirements, ORBA recommends that public sector buyers place a strong emphasis on minimizing administrative burden associated with demonstrating compliance.

A key risk we see emerging is inconsistent processes across owners where contractors are required to navigate multiple reporting frameworks related to the same policy directive.

To address this, ORBA strongly encourages procuring entities to adopt a standardized approach. The Ontario Ministry of Transportation (MTO), in consultation with ORBA, has developed a Domestic Supply Chain Plan and Declaration framework that both satisfies policy objectives and is designed to be minimally administratively burdensome.

This approach requires bidders to demonstrate that at least 51% of total bid value is derived from Ontario or Canadian goods and services, supported by a structured reporting table across key material categories such as aggregates, asphalt, concrete, and steel .

Importantly, this model:

- Aligns with provincial policy direction on domestic procurement;
- Reflects the realities of construction supply chains;
- Provides transparency and accountability; and
- Avoids overly prescriptive or duplicative reporting requirements.

ORBA believes that broader adoption of a consistent, streamlined model such as the MTO approach would minimize disruption across the sector while maintaining the integrity of domestic procurement objectives.

We would welcome the opportunity to engage further with your organization and its members to support alignment and share insights from the construction industry.

Sincerely,

A handwritten signature in black ink, appearing to read "SC", is positioned above the printed name and title.

Steven Crombie
Senior Director, Public Affairs
Ontario Road Builders Association