

March 27, 2026

Ministry of Transportation
301 St. Paul Street, 3rd Floor
St. Catharines ON
L2R 7R4

via: Online Submission

RE: Proposal No. 26-MTO005 - Proposed regulations related to issuing administrative penalties for select commercial and passenger offences in the Highway Traffic Act and the Towing and Storage Safety and Enforcement Act, 2021

Middlesex County appreciates the opportunity to provide feedback regarding the proposed regulatory framework to introduce administrative penalties under the *Highway Traffic Act* and the *Towing and Storage Safety and Enforcement Act, 2021*.

The County supports the Province's objective to modernize compliance tools, reduce reliance on the Provincial Offences Act system, and improve the timeliness and efficiency of enforcement activities. The introduction of administrative penalties as a progressive compliance mechanism has the potential to support these outcomes when applied to appropriately aligned regulated entities.

At the same time, the proposed framework introduces a number of operational and policy considerations with respect to its application to municipally operated fleets, including public works vehicles, winter maintenance equipment, and paramedic services.

Application of CVOR Framework to Municipal Operations

Municipalities in Ontario are subject to the *Commercial Vehicle Operator's Registration Program*, a regulatory framework designed primarily for commercial carriers engaged in goods movement and long-distance transportation.

Municipal fleets operate under fundamentally different conditions. Vehicles are deployed within defined service areas, are centrally managed, and are subject to established internal oversight, including operator training, supervision, maintenance programs, and public accountability through Council and administrative leadership.

In this context, the application of administrative penalties to municipalities through CVOR-related compliance programs does not align with the intended purpose of progressive compliance. Municipal operations do not reflect the same risk profile as commercial carriers, and there is limited evidence that additional financial penalties at the organizational level would result in improved safety outcomes.

Rather, this approach introduces a parallel compliance layer that duplicates existing municipal oversight systems without delivering a corresponding benefit.

Administrative Burden and Service Delivery Impacts

The proposed framework may result in increased administrative burden for municipalities, including the tracking, management, and potential dispute of administrative penalties across large and operationally diverse fleets.

Municipalities operate within finite financial and administrative capacity. Additional compliance requirements and potential penalties would ultimately be borne by the municipal taxpayer and may divert resources from core service delivery, including winter maintenance, emergency response, and infrastructure operations.

This represents a material public interest consideration that distinguishes municipalities from private-sector regulated entities.

Emergency Services and Automated Enforcement

The County also wishes to highlight a significant operational issue related to automated enforcement.

Municipal emergency response vehicles, including paramedic services, are routinely required to proceed through controlled intersections, including red lights, in accordance with legislated authority and established emergency response protocols. Despite this, automated enforcement systems, such as red light cameras, continue to issue penalties in these circumstances.

Municipalities are then required to undertake administrative processes to pay and/or dispute to clear these charges and, in some cases, address associated impacts within CVOR-related compliance systems.

This creates a recurring administrative burden for municipalities and the Province, without contributing to improved safety outcomes.

The County recommends that municipal emergency response vehicles be expressly exempted from automated enforcement penalties when operating in the course of duty, including any associated administrative requirements related to CVOR records or compliance tracking.

System Efficiency and Targeted Application

From a system perspective, the inclusion of municipal fleets within the proposed administrative penalty framework may generate a high volume of low-risk compliance transactions and disputes. This has the potential to consume Ministry resources without advancing the primary objective of improving safety outcomes among higher-risk commercial operators.

A more targeted approach would support the effectiveness of the framework by focusing administrative penalties on sectors where behaviour change is most likely to be influenced.

Overall Approach and Recommendations

Middlesex County supports the Province's objective to strengthen compliance and enforcement tools; however, the proposed framework would benefit from a differentiated approach that recognizes the distinct role of municipalities as public service providers.

The County recommends that:

- Municipalities be explicitly exempted from the application of administrative penalties under the proposed regulatory framework where those penalties are tied to CVOR-related compliance programs.
- Municipal emergency response vehicles be exempted from automated enforcement penalties when operating in the course of duty, including any associated administrative or CVOR-related requirements.
- Consideration be given to a broader differentiated compliance approach that reflects the operational, governance, and risk characteristics of municipal fleets.

Middlesex County remains supportive of the Province's efforts to modernize compliance and enforcement systems and recognizes the potential benefits of administrative penalties when appropriately applied.

The County encourages the Province to continue working collaboratively with municipalities to refine the regulatory framework to ensure it achieves its intended objectives while avoiding unintended impacts on municipal service delivery and administrative capacity.

Middlesex County remains available to participate in further discussions to support the development of an effective and practical approach.

Regards,

A handwritten signature in black ink, appearing to read "Sue Clarke". The signature is fluid and cursive, with the first name "Sue" being more prominent and the last name "Clarke" following in a similar style.

Sue Clarke
Warden

Cc: Chris Traini, Deputy CAO / County Engineer
Adam Bennett, Director of Paramedic Services