Ontario

TITLE (policies, standards and specifications)

Comments received by TCP			
Comment ID	**Organization**	**Comment**	**Response**
563-1		Regarding Lead Inspectors: Will MTO Bridge Inspection Workshops be offered on an annual basis, to ensure there are adequate opportunities for assistant inspectors to qualify as lead inspectors?	The MTO Bridge Inspection Workshops will be held every two years. In between these years, inspectors can receive a certification of completion of the workshop by completing a Bridge Inspection Consistency Exercise (held once a year by the MTO), reviewing the last recorded Bridge Inspection Workshop, and completing an in-person quiz.
563-2		Regarding Lead Inspectors: Many foreign trained engineers do not qualify as EIT's through PEO, are foreign trained engineers who are in the process of obtaining their P.Eng. designation through PEO precluded from qualifying as lead inspectors?	Foreign trained engineers in the process of obtaining their licenses can be qualified as a lead inspector for culvert and retaining wall structures, based on their experience, but their work would still need to be done under the supervision of a PEO licensed engineer. However, they would not be qualified for bridges and tunnels.
563-3		Regarding Lead Inspectors: Without any of the prescribed designations, these inspectors would be precluded from consideration as lead inspectors.	Agreed.

563-4		Regarding Lead Inspectors: Certified Engineering Technicians (i.e., C. Tech.) be precluded from consideration as lead inspectors.	Certified Engineering Technicians would be precluded from being lead inspectors.
564		Subject: Clarification on Extent of Inspection for SBGR under OSIM I would appreciate your guidance regarding the extent of inspection required to meet the legal requirements under the Ontario Structure Inspection Manual (OSIM). Specifically, I am seeking clarification on the limits of inspection for Steel Beam Guide Rail (SBGR) and associated components (e.g., energy attenuators) located in the vicinity of bridge and culvert structures. In practice, SBGR installed over a structure often extends beyond the structure limits. In some cases, this extension is approximately 10 m from the centerline of the structure, while in others it may extend more than 50 m on either side. Could you please clarify how the boundary of inspection should be defined in such cases? In particular:	Only SBGR that extends from the bridge's barrier system to the length of the wingwall or the approach slab (whichever is longer) should be inspected as part of the OSIM inspection. However, the inspector should take consideration of the settlement of the SBGR beyond these points if they have concerns about the performance of the foundational elements. A global review of a structure is always necessary when completing a bridge inspection even if the severity and extent of those portions of the SBGR are not accounted for in the inspection. Further clarifying language will be added to sections 2.1.5.1 and 2.2 in future revisions.

		Should the inspection of SBGR be limited strictly to the structure limits? what would be this limit? Or should it include the full length of SBGR functionally associated with the structure, regardless of its length? Your clarification will help ensure consistency and compliance with OSIM requirements during inspections. Thank you for your assistance.	
565		Based on the definition of a Primary Component in Section 1.2, how does a Wearing Surface meet the definition and a Bearing Seat not meet the definition?	Wearing surfaces are no longer considered to be primary components in Section 1.4.2. Clarification has been made in Section 1.5.2 to identify abutments as primary components, which includes bearing seats.
566-1		Based on the Concrete - Substructures and Superstructures Defect Definitions Table 2.5.4.1. How is an inspector to know if concrete has been cured at temperatures above 70 degrees Celsius resulting in DEF based on a visual observation?	DEF cannot be determined based on visual inspection alone, but its presence may be inferred by what is visually seen on the structure, combined with the volume of the element and the probability that its curing temperature exceeded 70 degrees C.
566-2		Figure A.2 - The picture shows a superstructure settlement relative to the asphalt approach. The Figure	The description and table accompanying Figure A2 has been corrected.

		description and table below appears to be incorrect.	
567		Should the water testing equipment in Table 3.8.1 be specifically added to the list of standard inspection equipment noted in Section 2.1.4.1?	Water testing equipment (in general terms) has been added to 2.1.4.1. The particular water testing equipment used during an OSIM Inspection will now be recorded on the OSIM form.
568		For Section 2.1.1.2. in reference to the number (i.e. 100 or 20) previous OSIM Inspections required for the lead inspectors, should the total not be specific to the type of structure being inspected? I.e. for bridges 100 previous OSIM "Bridge or Tunnel" Inspections or 20 previous OSIM "Culvert or Retaining Wall" Inspections as opposed to OSIM Inspections in general?	Thank you for your comment. As the intention is that bridge and tunnel inspectors need to see a larger variety of structure types and structural elements, which should be demonstrated across the required 100 OSIM inspections.
569		Subject: Comment on 2026 OSIM Draft Review – Section 2.1.2 Qualifications Required for Inspections of MTO Structures I am writing to provide feedback on the proposed inspector qualification requirements outlined in the 2026 OSIM draft. While maintaining high standards for bridge inspection is essential for public safety, the current direction appears to place unnecessary emphasis on formal design-focused	Thank you for your comments. We will take your comments into consideration for future revisions of the OSIM.

		credentials rather than demonstrated inspection experience. In practice, many transportation authorities successfully rely on competency-based frameworks that prioritize hands-on inspection experience, mentorship, and progressive responsibility over strictly requiring engineers with specific design designations. Across North America, numerous agencies allow inspectors to qualify based on a combination of experience, training, and proven field competence. These models recognize that the core function of an inspector is fundamentally different from that of a designer. Inspection requires keen observational skills, familiarity with deterioration mechanisms, and practical judgment developed through repeated field exposure. These are competencies that seasoned inspectors—particularly career bridge inspectors—develop over time and often exceed those of engineers who may not regularly work in inspection roles. Restricting OSIM inspections to engineers holding specific design certifications such as CET or EIT risks	

		narrowing the talent pool and undervaluing experienced inspectors whose primary expertise lies in inspection rather than design. It may also inadvertently encourage career progression away from inspection roles, as individuals seek credentials that shift their focus toward design or management, rather than remaining in the field where their experience delivers the greatest value. From having a rotating position of inspector within a ministry or private company there are large costs associated with the presence of the professionals in the field. There will be a continuous brain drain from the inspection pool as professionals like Engineers, CET and EIT move to a more office-based work style and in turn a new group will need to be taught about the inspection of structures possibly weakening the ability to catch critical defects. Career inspectors provide continuity, institutional knowledge, and consistency in condition assessment—qualities that are critical to long-term asset management. Their contributions should be recognized and supported through a framework	

		that emphasizes experience-based competency, structured training, and ongoing professional development, rather than credential-based exclusion. I encourage consideration of a more balanced qualification model that: - Recognize extensive inspection experience as a primary qualification pathway - Support mentorship and supervised progression for developing inspectors - Maintain rigorous training and certification requirements specific to inspection work and the safety fields that bridge inspection require (OGRA OSIM Course, AREMA Inspection Module, Working at Heights, Confined Space, Working around water, etc...) - Value and retain career inspectors as subject matter experts in their field Such an approach would align with best practices across multiple jurisdictions while preserving safety, improving workforce sustainability, and ensuring that inspection quality remains grounded in real-world expertise. Thank you for the opportunity to provide input on this matter.	

571		Part 4, Section 3.8 Water Testing Clarification is requested regarding the intent and purpose of requiring water testing at all sites where a structure is in contact with water. In cases where a structure shows no observable signs of deterioration is water testing necessary to identify an exposure class or deterioration mechanisms? Section 3.8 references CHBDC Clause 2.3.2.2, which is intended to define environmental conditions for design purposes. Given this context, clarification is requested on the benefit of maintaining a record of water quality conditions as part of routine OSIM inspections, particularly where the original intent of the clause is to establish environmental exposure for design considerations rather than ongoing condition assessment.	This data is being collected to fulfill our responsibility to the CHBDC sub-section 2.3.2.2. Collecting this data over time will indicate how the environmental conditions change over time as well as correlating it with element deterioration over time. We added clarifying language to 3.8 to improve the understanding of the purpose of water testing.
572		Part 4, Section 3.8 Water Testing A 2009 MTO Memorandum provides clarification on OSIM inspection timing requirements for newly constructed and rehabilitated structures, indicating that the first inspection is to be completed within two calendar years	We've added the following to section 1.1.3.2: Structures must receive their first inspection within two calendar years of substantial completion or the commencement of its use for its intended purpose.

		of construction contract completion and opening of the structure to traffic. However, for long-term, multi-year project, such as LRT or highway projects extending five to ten years or more, this requirement can create ambiguity. Structures constructed early in the project may not be considered technically “substantially complete” until the overall project is finalized, yet they may be open to traffic for several years prior to the completion of the first OSIM inspection. This situation may result in extended periods during which in-service structures remain uninspected under OSIM requirements. To address this issue, clearer definitions of “completion of the construction contract” and “opening of the structure to traffic” would be beneficial, particularly for large, phased projects involving early use of individual structures prior to overall project completion.	
573		The requirement to record defect quantities in whole numbers for square metres (area) and linear metres (length) is generally appropriate for larger structures or elements and has minimal impact on	Thank-you for your comment. MTO's practice is to use whole numbers. Adding decimal quantities will not add appreciable value to the inspection.

		the overall structure condition rating or BCI. However, for smaller structures or elements, this approach may be misleading to both inspectors and owners. For example, a newer 3 m span concrete culvert may exhibit a localized spall measuring approximately 100 mm × 100 mm (0.01 m²); nevertheless, the form would require the defect to be recorded as 1 m². This overrepresentation may create confusion regarding the severity and extent of deterioration. Allowing defect quantities to be recorded to the nearest tenth, rather than as whole numbers, would provide a more accurate representation of observed defects, particularly for smaller structures and localized deterioration.	

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