

June 9, 2025

Infrastructure and Environment Committee
City of Toronto
100 Queen Street W
Toronto, ON M5H 2N2

Dear Members of the City of Toronto Infrastructure and Environment Committee,

RE: IE22.15 – Minimizing Salt Pollution that Poisons Rivers and Streams

As Executive Director of Landscape Ontario, I am pleased to see the City of Toronto consider ways to minimize salt pollution. Landscape Ontario has developed snow and ice removal protocols and professional training that would ensure that an ideal balance between safety, environmental protection, and salt usage is achieved and have been advocating for the provincial government to implement them.

I would like to take this opportunity to introduce my organization and our efforts to enhance safety and protect the environment. My hope is that you will incorporate our recommendations that would help to balance liability between both property owners and snow and ice contractors into this motion.

Landscape Ontario is the province's premier landscape horticulture trades association and has ten sector groups to address the specific needs of the industries we represent. Landscape Ontario's Snow & Ice Management Sector (SMS) group works with private snow and ice contractors, salt suppliers, equipment manufacturers, municipal managers, commercial and multi-residential property managers, and owners to educate and advocate on topics such as the importance of the Smart About Salt accreditation.

The SMS Sector represents approximately 8,000 small businesses that employ a massive workforce in every region of Ontario and provide an essential public service that allows people to live their lives, get to work, attend school, and access emergency services when needed. Our membership includes over 1,000 thousand businesses right here in Toronto.

As snow and ice contractors, we are faced with professional objectives of safety and environmental protection that are in direct conflict with each other and reform of the insurance system is urgently needed.

Snow and Ice contractors feel pressured to use high amounts of salt due to liability concerns. This leads to contractors bearing the bulk of legal responsibility and increased use of precautionary salt as a result. At the same time, sky-high insurance costs and a shrinking pool of insurers willing to provide coverage for our trade have pushed people out of the industry, causing job losses and a shortage of workers. Landscape Ontario has been advocating for the legislative changes needed to benefit the environment, reduce high insurance costs, and attract more workers.

There is a very real danger that the declining numbers of snow and ice contractors will result in a decreased capacity of service for many municipalities and organizations next winter unless there is legislated reform.

We could achieve safe conditions and use less salt if we were allowed to use best snow and ice management practices. Reducing insurance costs through a more balanced distribution of liability between contractors and property owners which would also help more people join our industry.

Excessive road salt use has a negative impact on the environment. High levels of chloride from winter salt causes harm to water resources, aquatic life, soils, vegetation, and infrastructure.

But liability risk is preventing the reduction of salt use.

Property owners demand oversalting to avoid slip and fall risks, and in doing so they pass along the responsibility for any liability as well as ecological damage, infrastructure damage to snow and ice contractors.

Unfortunately, oversalting is the direct result of working within a system that does not involve proper site-specific risk analysis and clear levels of service through risk analysis and established policies.

Contractors cannot always keep a property 100% clear due to circumstances outside of their control, such as unpredictable weather, poor site design and drainage issues owners do not eliminate – a prescribed, regulated system will help to identify and eliminate hazardous conditions and balance risk fairly between property owners and contractors.

After several mild winters, the huge increase in major snow events this season highlights the critical importance of having properly trained snow removal contractors in sufficient numbers.

I know that everyone in Toronto will appreciate the importance of having sufficient snow removal equipment, materials, and workers after your experiences with multiple significant snow events this year.

The combination of increased number of snow events and oversalting had another effect this year - it brought on a widespread road salt shortage during February's storms.

Landscape Ontario has developed snow and ice removal protocols and professional training that would ensure that an ideal balance between safety, environmental protection, and salt usage is achieved.

We believe that a regulated snow and ice management system supported by a legal framework as recommended will provide owners, site managers and snow contractors with a system that improves the unstable insurance cost environment while concurrently creating balance between acceptable risk, and protection of the environment.

We propose that contractors who undergo training and accreditation will receive limited liability protection. This will help with consumer protection and our retention of employees – both major issues. Similar programs have been successfully established in the northern United States.

We have been working with our members, environmental advocacy groups, and scientists and believe that we can create a fair system that will allow snow and ice contractors to enhance safety while protecting the environment.

We are very proud to have received the 2024 Lake Simcoe Region Conservation Authority Distinguished Achievement Award as a result of our advocacy to reduce salt usage. Most recently the Burlington Chamber of Commerce bestowed their Environmental Impact Award to Landscape Ontario.

The key to reducing salt usage is limited liability protections and reduced insurance costs for professional snow management contractors who have completed training. Providing training and reducing costs for business owners will help to support jobs for the workers who are so badly needed in our industry. This winter's heavy snowfall and subsequent salt shortage shows the value of our work and the urgent need for change.

Over the past several months, Landscape Ontario has been meeting with various Ministries of the Ontario government including Environment and the Attorney General to actively advocate for the legislative changes that are needed to create a more balanced distribution of liability between contractors and property owners.

We are very happy to see the City of Toronto consider supporting the need for provincial action on salt pollution on road salt. This is the kind of help that we need as we seek to reform the current liability system and create a regulatory framework.

However, the motion as written does not include protection for snow and ice contractors – we strongly believe that limited liability legislation must distribute liability equally between property owners and managers and snow and ice contractors.

Landscape Ontario recommends that IE22.15.1 be amended to:


1. City Council request the province of Ontario Minister of Municipal Affairs and Housing to adopt limited occupier liability legislation that protects property owners and managers, including municipalities, and snow and ice contractors from slip and fall lawsuits, provided that they have taken all reasonable steps to follow Provincial best-management practices for salt use in controlling snow and ice.

I hope that you will join other municipalities such as the City of Waterloo, District of Muskoka, City of Sudbury, and Town of Georgina and help us reduce the use of road salt and create a balanced liability system. Copies of these motions are included with this letter for your review.

Our services are essential for all Ontarians, and we employ a massive workforce that works 24/7 to provide safety for everyone, in all parts of the province, and is especially important for seniors and those with accessibility issues.




Committing to our plan will provide a direct benefit to everyone in the Greater Toronto Area and the millions of Ontarians who depend upon us every winter.

Sincerely,



Joe Salemi, CAE
Executive Director
Landscape Ontario Horticultural Trades Association

Attachments

- ☐  City of Waterloo Road Salt Motion - April 14 2025.pdf
- ☐  District of Muskoka - Resolution - February 19 2025.pdf
- ☐  Georgina - Motion - Road Salt Reduction - April 2 2025.pdf