



Annual Review of TTC's Safety, Health & Environment (SH&E) Management System

Date: May 26, 2026

To: Audit, Finance and Risk Management Committee

From: Chief Safety Officer

Recommendations

It is recommended that the Audit, Finance and Risk Management Committee:

1. Reaffirm support for the approach to continuously improving the effectiveness of the TTC's Safety, Health & Environment Management System, identifying priority safety, health, and environment issues, and developing the TTC's safety, health, and environment objectives, as described in this report.

Summary

The Toronto Transit Commission (TTC) continues to manage and mitigate occupational health and safety, operational safety as well as environmental risks due to its operations, activities, and services in a systematic manner through the implementation and maintenance of its Safety, Health & Environment (SH&E) Management System.

A SH&E Management System is a comprehensive and proactive approach to managing SH&E risk. The system goes beyond a simple sum of individual or isolated safety and environmental management programs and activities, such as investigation, inspection, or training. It is designed to improve SH&E performance and reduce risk by integrating all its processes into a continuous improvement cycle of Plan, Do, Check, and Act.

A review of the TTC's SH&E Management System is conducted by the TTC's internal Safety, Security, and Environment Executive (SX) Committee on an annual basis. The purpose of the review is to evaluate the suitability, adequacy, and effectiveness of the SH&E Management System, ensuring the ongoing management of SH&E risk.

The current review assessed the TTC's SH&E performance in 2025. The review was completed through analysis of the following inputs:

- Trends in Key Performance Indicators related to occupational health and safety, customer and public safety, operational safety, security, fire and life safety, and capital projects safety;
- Status of key SH&E projects and initiatives, highlighting significant developments in 2025;

- Audit and investigation findings, including the American Public Transportation Association's (APTA's) safety peer review; and
- Regulatory oversight, including regulatory agency interactions, and compliance status.

This report includes updates on the TTC's SH&E Goals and Objectives, which have been updated and restructured to align with the TTC's Corporate Internal Business Plan's Safety Objectives and Key Results.

In 2025, the TTC also completed an annual review of the written TTC Safety, Health & Environment (SH&E) Policy and TTC Workplace Violence Policy, as required under the Ontario Occupational Health and Safety Act (OHSA). There were no recommended changes to the SH&E Policy commitments. Regarding the 2026 Workplace Violence Policy, the following statement was included:

- *TTC workers will participate in and review workplace violence risk assessments specific to their job task.*

This change reinforces the TTC's commitment to worker involvement and participation in the workplace risk assessment process, ensuring the policy clearly reflects these principles. The TTC also reviewed and updated its Respect and Dignity Policy, now the Workplace Harassment and Discrimination Policy, which was released February 24, 2026.

The TTC's Safety and Environment Department engaged with Union executives in December 2025 to discuss updates to the safety policies, programs and the new Joint Health and Safety Committee (JHSC) feedback portal. The update also included an overview of key actions under the recently approved Community Safety, Security, and Well-being Plan.

This report summarizes the full report of the annual review, which was approved by the SX Committee on April 27, 2026.

Background and Analysis

Background

Under safety and environmental legislation, TTC Board members are considered directors of a corporation and have prescribed duties to take all reasonable care to ensure that the TTC complies with safety and environmental legislation and all regulatory orders. As such, Board members should be informed of the TTC's Safety, Health and Environment (SH&E) Management System and its performance in order to fulfill these duties. This is achieved through the communication of the report to the Audit, Finance and Risk Management Committee.

The SH&E Management System is built on the TTC's commitment to protecting the safety and health of its workers, customers, the public living in the communities in which it operates, and the protection of the environment. It is the system through which the

TTC manages and mitigates SH&E risks by integrating all its processes into a continual improvement cycle of Plan, Do, Check, and Act, as described below:

Plan

The SH&E Policy is the overarching document of the TTC's SH&E Management System and establishes its safety commitment. Processes are established, implemented, and maintained for the ongoing identification, assessment, and control of SH&E risks. The SH&E Goals and Objectives are established through the annual review process and act as the strategic plan to manage and control these risks.

Do

Formal SH&E programs are developed to control SH&E risks, and as needed, to address changes in legislation or emerging issues. Extensive internal stakeholder consultation occurs during program development, and programs are supported in their daily execution and revised, as needed.

Check

Internal audits range from local-level supervisor audits and Joint Health and Safety Committee (JHSC) workplace inspections to SH&E program audits and Safety Assurance Checks. Safety management system audits are conducted by the American Public Transportation Association (APTA) every three years. In addition, the Safety, Security and Environment Executive (SX) Committee Key Performance Indicator report and CEO's Report include the monitoring of safety and environmental data.

Act

The SX Committee reviews the SH&E Management System on an annual basis. This review evaluates how well the SH&E Management System is functioning to support the safety and security cornerstone of the TTC's Corporate Plan.

Comments

The information listed below summarizes the results from the analysis of the following inputs during the 2025 annual review process:

- Performance indicators;
- Status of key Safety, Health and Environment (SH&E) projects and initiatives;
- Audit and investigation findings; and
- Regulatory oversight and compliance.

SH&E Performance Indicators

The analysis of performance indicators is performed over a five-year period (January 1, 2021 to December 31, 2025) and a two-year period (January 1, 2024 to December 31, 2025) to present both the long- and short-term movement of the data and highlight any significant trends. Attachment 1 highlights notable findings from the analysis of performance indicators related to occupational health and safety, customer and public safety, operational safety and security, fire and life safety, and capital projects safety.

Projects and Initiatives

For many years, the annual SH&E Management System Review has established multi-year SH&E Goals and Objectives. The most recent set of goals and objectives was developed to align with the 2024-2028 Corporate Plan. While the number of goals has varied over the years, they have remained largely consistent as they have always been the long-term outcome of the collective efforts of the organization to improve safety and protect the environment.

During the most recent annual SH&E Management System Review, there were six SH&E goals. Each goal was supported by multiple strategies describing the approach to achieving the goal. Under each strategy were objectives, which defined the specific deliverables required to achieve the goal. Objectives were planned over a five-year horizon and classified by expected completion time frame – short-term, mid-term, and long-term. Attachment 2 includes a summary of the key accomplishments on projects that experienced significant developments in 2025 and have broad organizational impact. They are outlined by goal to better align with the 2025 SH&E Goals and Objectives.

Audits and Investigations

Audit, inspection, and investigation activities continue to provide assurance of system effectiveness and identify opportunities for improvement. Several audits and inspections are conducted by the Safety and Environment Department, including track level safety observations, Safety Assurance (SA) Checks, safety management system audits and environmental inspections.

Findings from 2025 SA Checks, track level safety observations and inspections include:

- Overall compliance with SA Checks remained strong, with improvements noted in subway operations.
- A year-over-year comparison of track level observations from 2024 to 2025 showed a continued decrease in minor non-conformances and a decrease in gross violations. Shutdowns were virtually unchanged, with 1.1 per period in 2025 compared to 1.0 per period in 2024.
- A total of 48 facility inspections were completed by the Safety and Environment Department, resulting in the identification of 356 deficiencies. All identified deficiencies were communicated to the respective location management teams and follow-up visits were conducted to verify compliance.
- Hazardous waste inspections were also completed at all maintenance facilities in 2025. Average compliance for 2025 was 92%, with nine facilities achieving 100% compliance.

A structured audit schedule has been developed to prioritize the evaluation of key SH&E programs and procedures in 2024 through 2027. In 2025, audit activities were completed for the *Corporate Program – Respiratory Protection* and the *Corporate Program – Ladder Safety*. The audit reports are being finalized for circulation to impacted departments. Action items will be tracked to completion by the Safety and Environment Department.

A Safety Peer Review was conducted by the American Public Transportation Association (APTA) in October 2024. The findings recognized TTC strengths in

employee engagement, Personal Protective Equipment (PPE) use, and best practices. Final recommendations were received in March 2025 and applicable actions are underway, with nearly 60% of items currently closed. The Safety and Environment Department continues to work with stakeholders to address the remaining actions. The next APTA Audit is anticipated to take place in 2027.

Investigations are conducted according to the criteria outlined in the *Corporate Program – Incident Reporting and Investigation*. Based on the findings, corrective actions are established and tracked on an ongoing basis. The Safety and Environment Department conducted 17 Level 2 incident investigations in 2025. This compares to eight in 2024, six in 2023, and 16 in 2022. Updates on corrective action progress are provided to the Safety, Security and Environment Executive (SX) Committee on a quarterly basis. The TTC Board is advised of all incidents that meet the criteria outlined in the Escalation and Notification Protocol, which was approved by the TTC Board in July 2021.

In 2025, several ongoing Level 2 investigations reached completion with their corrective action plans. Key corrective actions included advancements in piloting operator assist technologies on buses, implementing wearable flashing lights for required workers at track level and strengthening winter operations controls during subway operation.

Results from a work car collisions trends analysis produced corrective actions focused on improving yard operations, yard control visibility and routing practices, monitor usage, post-incident documentation, and review of equipment and workplace design limitations.

Regulatory Compliance

The statements and table below summarize the number of regulatory interactions and orders issued during the review period.

An interaction refers to a:

- Report made by the TTC to a regulatory agency;
- Communication received from a regulatory officer requesting information, by phone, e-mail or in person; or
- Visit to a site or TTC property, pre-planned or unplanned, by a regulatory officer.

Table 1.1 Summary of Regulatory Interactions and Orders in 2025

Type	Interactions/ Visits		Requirement Orders Issued		Non- compliance Orders Issued		Status
	2024	2025	2024	2025	2024	2025	
Ministry of Labour, Immigration, Training and Skills Development	91	93	8	13	7	6	Compliance achieved
Ministry of the Environment, Conservation and Parks	0	4	0	0	0	1	Compliance achieved
Technical Standards and Safety Authority	1	0	0	0	4	0	N/A
City of Toronto	2	0	0	0	1	0	N/A
Toronto Fire Services	5	8	0	0	2	6	Compliance achieved

The orders were primarily related to mould remediation, measures for protecting workers against asbestos exposure, and workplace harassment. A notice of violation was received for exceeding the City's By-law limit for Oil and Grease in wastewater and issues related to alarm control panel status and maintenance. **All orders have been complied with and are now considered closed.**

In 2025, the TTC continued to have more than 90 interactions involving the Ministry of Labour, Immigration, Training and Skills Development (MLITSD). Only a small number of contraventions of the Occupational Health and Safety Act and its regulations were identified, reflecting a high level of compliance, as evidenced by the low number of orders issued relative to the total number of interactions.

Objectives and Key Results

In 2025, TTC leadership began developing the Internal Corporate Business Plan to align annual Objectives and Key Results (OKRs) with the long-term priorities of the public-facing TTC Corporate Plan. As part of this shift, the 2024-2028 TTC Corporate SH&E Goals and Objectives were restructured to align with the new planning and performance framework.

Under the TTC Internal Corporate Business Plan, the overarching Safety Goal is to:

Protect the safety, security and well-being of workers, customers, and the communities we operate in while minimizing the impact to the environment.

The six goals from the 2024-2028 TTC Corporate SH&E Goals and Objectives were translated into six objectives, each supported by multiple Key Results within the new OKR and Visual Management Board system:

1. Improve and strengthen controls to reduce all injury and illness risk.
2. Improve community, safety, security, and well-being on the transit system.
3. Improve and strengthen planning, response, and recovery capabilities to mitigate the impacts of emergencies and disruptions.
4. Strengthen SH&E Management System by embedding safety risk management practices.
5. Improve contractor safety management to enable a consistent approach across the TTC.
6. Improve and strengthen environmental management.

Safety-related Key Results at the Executive level include the following:

1. Demonstrate progress in reducing the Lost Time Injury Rate (LTIR) from a 5.29/100 employees baseline toward the 4.9/100 employees target, supported by measurable quarterly improvement and enhanced controls.
2. Customer Injury Incident Rate reduced from 2.28/1M boardings to target of 2.0/1.0M by end of 2026.
3. Customer Satisfaction with Personal Safety Improvement to 70% by end of 2026.
4. Deliver an emergency management exercise series in 2026 that concludes with a functional exercise in December.

Progress toward achieving the Key Results and associated actions are tracked through Visual Management Boards at various levels of the organization. As part of the TTC SH&E Management System, TTC Executives will review progress against SH&E OKRs on a quarterly and annual basis through the management system review process.

The mid- and long-term planning objectives of the 2024-2028 SH&E Corporate Goals and Objectives remain relevant and will inform the development of 2027 OKRs along with inputs from SX Committee SH&E Management System Reviews and quarterly department-led operational safety learning reviews. Operational safety learning reviews will initially focus on those departments implementing lost time injury and customer injury reduction initiatives with the purpose of assessing action plan status, identifying issues and lessons learned, and evaluating the effectiveness of implemented controls.

Learnings from each quarter will be systematically captured and applied to support continuous improvement. Over time, this approach will expand beyond current lost time and customer injury initiatives to incorporate other SH&E Management System inputs including inspections, safety assurance checks, and risk assessments.

Conclusion

Overall, the TTC's SH&E Management System remained suitable, adequate and effective in 2025, providing a consistent framework to identify, manage, and monitor SH&E risks across the organization. While performance was stable in several areas and improvements were observed, such as no statistically significant two-year trends in occupational and customer injury rates, ongoing risks require continued focus, particularly those contributing to increases in collision-related outcomes and injury events.

In response, the TTC is advancing targeted action plans and initiatives, including the Bus Collision Reduction Strategy, the Lost Time Injury Reduction Strategy, the Customer Injury Incident Reduction Strategy, and actions under the Community Safety, Security, and Well-Being Plan, supported by assurance activities, audits, investigations, and corrective action tracking. Through continued executive oversight and the integration of annual SH&E Objectives and Key Results within day-to-day operations management, the TTC will maintain a continuous improvement cycle to strengthen controls, reduce risk and improve safety, security, well-being, and environmental performance for employees, customers, and the communities the TTC serves.

Diversity, Equity and Inclusion Matters

Equity, Diversity, Inclusion, and Accessibility (EDIA) are key principles that inform and underpin the TTC's services and activities. The TTC is committed to supporting individuals with accessibility needs by working toward making our services and facilities fully accessible to enable all individuals the freedom, independence, and flexibility to travel anywhere on the transit system, while being treated with respect and dignity. This is supported by the TTC's SH&E Management System.

An effective and robust SH&E Management System is essential to the protection of communities, customers, and employees who are disproportionately affected by safety, health, and environmental systemic barriers. This may include women, Black, Indigenous, and various racialized communities, people with disabilities, gender diverse communities (2SLGBTQ+), and individuals experiencing disparities due to their sex, sexual orientation, or gender identity.

Financial Impact

Approval of the recommendations in this report has no funding implications beyond the costs included in the 2026 Operating Budget, approved by the TTC Board on January 7, 2026, and by City Council on February 10, 2026. Ongoing future improvements and effectiveness of the SH&E Management System, requiring additional funding, will be requested through the annual operating budget submission and is subject to annual budget approvals by the TTC Board and City Council.

The Interim Chief Financial Officer has reviewed this report and agrees with the financial impact information.

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Attachments

Attachment 1 – Decision History
Attachment 2 – Trends in Performance Indicators and Current Actions
Attachment 3 – Key Developments in Projects and Initiatives

ATTACHMENT 1 – DECISION HISTORY

The TTC Audit, Finance and Risk Management Committee determined at its meeting on June 3, 2019 that the [Annual Review of the TTC's Safety, Health and Environment Management System](#) would be presented annually to the Audit, Finance and Risk Management Committee and the TTC Board to provide members with information on the functioning of the TTC's SH&E Management System, which will help them fulfil their legislative duties as directors of a corporation.