



June 23, 2019

Re: GL6.31 City of Toronto Municipal Code Chapter 546, Licensing of Vehicles-for-Hire

Dear Members of General Government and Licensing Committee,

As one of your fellow City Councillors recently stated, “we are sitting in a city that was built for a climate that no longer exists”¹. While responding to the climate crisis is a big responsibility, our city has committed to doing its part and each committee at City Hall has a role to play, including yours.

Sometimes, showing leadership on climate change includes turning our attention to small policy changes that can make a big difference. Today, you have one of those opportunities in front of you.

As the committee responsible for licensing various types of businesses, you are in charge of setting the standards by which they operate. With local air pollution still contributing to major health problems and transportation being one of our greatest sources of greenhouse gas emissions, you have a duty to set and maintain environmental standards for vehicles-for-hire such as taxicabs and Private Transportation Companies (PTCs) like Uber and Lyft. At a 500%+ growth rate in five years, this is a growing source of transportation pollution that can't be ignored.

The City's low-emission standards are working and there is no reason why PTC vehicles should be exempt. Taxicabs have to meet the City of Toronto's fuel efficiency standards and they are 20% more fuel efficient than the average PTC vehicle². Rather than lower the bar for all vehicles-for-hire, raise the bar for the PTCs. To meet TransformTO's targets, a level playing field must also be low-emission.

Toronto Environmental Alliance (TEA) joins The Atmospheric Fund (TAF) in requesting that you:

1. Delete recommendations 77 and 78 in order to maintain low-emission standards for taxicabs.
2. Develop a plan to extend low-emission standards to PTCs. According to your own report, 9 in 10 Toronto residents want vehicles-for-hire to meet environmental and emission standards³.
3. Update the fuel consumption rating as recommended by TAF ([GL6.31.9](#)). The City has not updated the rating since it was first set in 2014, despite a commitment to do so annually.
4. Start planning now for a zero-emission vehicle transition by 2030. As vehicles-for-hire get replaced, they should be electric.

Sincerely,

Heather Marshall
Campaigns Director

¹ <http://projects.thestar.com/climate-change-canada/toronto-flooding/>

² <https://taf.ca/vehicle-for-hire-fuel-efficiency/>

³ <https://www.toronto.ca/legdocs/mmis/2019/gl/bgrd/backgroundfile-134403.pdf>