

December 13, 2021

Mayor John Tory and City of Toronto Executive Committee
100 Queen St. West
Toronto ON M5H 2N2

Re: For consideration during City Council deliberation of *Automated Micro-Utility Devices*, IE26.12

To: Mayor John Tory and the City of Toronto Council

Your current consideration of the ‘Automated Micro-Utility Devices’ (item IE26.12) has caught the interest and imagination of Toronto Region Board of Trade and our members for a number of reasons, which we elaborate upon below. Namely, we ask the City to consider the potential benefit to those with disabilities, the benefit to our local communities, and, notably, the upside of ‘saying yes’ to innovation in our Region – or conversely, the unintended consequences of ‘saying no’ to future investment and innovation.

To acutely acknowledge the points raised by the Infrastructure and Environment Committee in deliberation of the item IE26.12: proliferation of these small, ‘micro-utility’ robots could in fact present more significant benefit to those with disabilities than disadvantage. The Board therefore compels City Council to consider the below points when acknowledging the considerations raised by the Toronto Accessibility Advisory Committee.

- The robots offer a low-cost delivery service, potentially benefiting those who have more severe mobility issues. The elderly and individuals with disability have been the biggest beneficiaries of the services the robots provide.
- Having now traversed nearly 100k miles, the robots have yet to experience any major issues when encountering pedestrians. This track record likely exceeds that of other ‘manned’ modes of delivery—including on foot.
- In light of social distancing concerns raised by the pandemic, the small delivery robots offer individuals a transmission-safe alternative for food delivery.
- Some of the firms developing the technology used to handle the micro-utility robots have had ongoing engagement with the accessibility community to improve its technology, ensuring—and perhaps increasing—the safety of everyone who uses Toronto sidewalks.

More broadly, as with development of any new technology, the development of these small delivery robots within Toronto represents the beginnings of what could be a promising, and publicly visible, addition to the City’s innovation economy. This juncture represents a critical point in the City’s ability to demonstrate to global innovators that it understands the value in working with innovative technologies—developing public policy collaboratively—to benefit both society and the economy. Now is the opportunity for the City to demonstrate to global innovators that we’re ready to say “yes to innovation”.

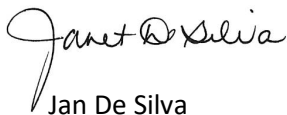
Decisions like the ‘ban’ proposed by Infrastructure and Development Committee severely hinder development of nascent industry. The exceptionally high cost of research and development shouldered by small, innovative firms, means they do not have the capacity to proactively engage with government on perceived risks. When

government makes far reaching decisions such as these, without due consideration, it costs small, cash-strapped innovators a crippling amount of time and money to react, acknowledge and reconcile. Therefore, when examining possible risks new technologies pose, especially those in their pilot phase (such as is the case with the delivery robots), government must take a similarly iterative approach—proactively adjusting policy and regulation to balance risk and benefit.

By nature, development of a new technology or practice is an evolving process, with far more ‘unknown unknowns’ than ‘known unknowns’. As policy looks to maintain oversight of new technology, it must also be cognizant of the broader public and economic benefit to be reaped by new technology development. Encouraging a collaborative approach, which allows innovators the opportunity to reconcile perceived risks or negative externalities in consult with government ensures that opportunities to develop and refine technology in pursuit of social and economic advancement are not overlooked. Otherwise, prescriptive policies, such as overarching ‘bans’, risk throwing the proverbial baby out with the bathwater. Public policy and regulation must be iterative and proactive: looking to evolve with and acknowledge risks in tandem with technology development.

All levels of government must work to cultivate innovation. Saying “yes to innovation” isn’t a matter of simply investing but demonstrating interest through fair and amenable policy governance structures. A vote in opposition to the suggested direction would demonstrate our willingness to work collaboratively; sending a strong message to current and future innovators within the City: We’re willing to take the first step into the future together.

Sincerely,



Jan De Silva
President & CEO