

April 13, 2016

Dear Committee Members:

RE: LS10.3 – A New Vehicle-for-Hire Bylaw to Regulate Toronto’s Ground Transportation Industry

Air pollution and greenhouse gas (GHG) emissions from transportation are a major concern for Toronto. While all other sources of air pollution and GHG emissions are trending downwards, transportation emissions continue to increase inexorably. Vehicle traffic generates 41% of City-wide GHG emissions, while also causing an estimated 280 premature deaths and 1090 hospitalizations due to air pollution every year¹.

In this context, we are deeply concerned to note that the proposed bylaw eliminates Toronto’s taxicab fuel efficiency standards. These fuel efficiency standards, introduced in 2014, were expected to reduce GHG emissions by over 30,000 tonnes annually once fully phased in. Given rising emissions from the transportation sector, removing this requirement is a significant step backwards. While the rationale is to level the playing field in the vehicle-for-hire industry, doing so should not necessitate a race to the bottom with regards to environmental standards.

TAF strongly urges the Licensing and Standards Committee to maintain the existing fuel efficiency requirements for the taxicab industry. Furthermore, consideration should be given to extending the fuel efficiency requirements to all vehicles-for-hire, thereby leveling the playing field without spiraling into a race to the bottom. Should the requirement be removed at present, it should be only on a temporary basis until such time as fuel efficiency requirements are extended to Private Transportation Company (PTC) Vehicles. Levelling the playing field for PTCs and the conventional Taxicab industry should not require compromising on the City’s air quality and climate change objectives.

Sincerely,



Bryan Purcell
Director of Policy and Programs
Toronto Atmospheric Fund

¹ Medical Officer of Health, *Path to Healthier Air: Toronto Air Pollution Burden of Illness Update*, April 2014.