

July 12, 2019

Ms. Ulli Watkiss
City Clerk's Office, City of Toronto
100 Queen Street West, 13th floor, West Tower
Toronto, Ontario M5H 2N2

Dear Ms. Watkiss,

**Re: Review of the City of Toronto Municipal Code Chapter 546
Licensing of Vehicles-for-Hire**

The Toronto Region Board of Trade ("the Board") is a strong advocate for evidence-based policies and innovative solutions that improve the movement of people and goods in the region. As a global city, Toronto needs a transportation system that is reliable, affordable, intermodal, and integrated if it is to remain competitive and drive economic growth.

The City of Toronto's proactive approach in choosing to accommodate new technologies in transport through the 2016 by-law played a crucial part in not only increasing mobility options for residents, but doing so in a way that enhances competition, service standards, affordability, and customer satisfaction.

The 2019 review of the by-law is an important opportunity to re-assess the impact of vehicles-for-hire and weight the need for regulations that further improve safety standards, establish greater industry accountability, and level the playing field for existing taxi and limo industries to compete, with the flexibility the industry needs to continue innovating and delivering new service types and safety tools.

We believe the Report from the Executive Director, Municipal Licensing and Standards finds the right balance on new regulatory requirements that prioritize customer needs and safety. It establishes the stability and predictability to set the industry up for continued improvement, while providing the City with the tools it needs to make evidence-based decisions in a rapidly changing mobility landscape, especially when it comes to reducing congestion and emissions.

The Report recommends a range of new standards relating to safety, including collision reporting, bicycle safety information, driving experience requirements, and training programs. This represents a best-practice approach to safety regulation whereby multiple tools are used to mitigate risks and can adapt to new requirements. To ensure that industry is accountable and responsive, the Executive Director should have the necessary control over new safety standards to make changes when needed based on evidence and consultation with stakeholders.

Considering the fluid movement of business operations and people across municipal boundaries in the Greater Toronto and Hamilton Area (GTHA), the Board recommends the City of Toronto should take a leading role to harmonize regulatory regimes with neighbouring municipal and regional counterparts. Emerging innovation economy industries that require a new set of

regulations should not be impeded by differentiating municipal by-laws. For example, municipalities across the GTHA have different vehicle-for-hire regulations, including differences in vehicle age, payment processes, reporting standards, and driver application processes. While these regulatory schemes are all similar, the duplication creates significant administrative burden and unnecessary compliance risk.

As the largest and leading municipality in the region, Toronto has a unique position to build on its comprehensive research and work with neighbouring partners to develop a more consistent regulatory environment that helps businesses operate, grow, and serve customers across our regional economic zone.

When Council considers this by-law review, as well as future enabling legislation for the industry, it is important that the vehicle-for-hire sector is not viewed in isolation. The future of transport will be increasingly connected and integrated, requiring a holistic approach to its management. Customers will increasingly want to access different types of transport services on-demand and in real-time.

This concept, known as Mobility-as-a-Service (MaaS), is the emerging reality of aggregating multiple transport mobility solutions – both public and private transport modes including vehicle-for-hire, bike sharing, car sharing and transit – into a unified service or phone app. This transition is already being driven by customer demand for increased convenience and safety. It also holds great potential for improving mobility in a metropolitan area like ours, as we struggle with both congestion and first/last mile connectivity.

The seamless and convenient integration of different mobility options offered by MaaS can also help shift away from individual, siloed, transport modes, especially private car ownership. When people can access full-service MaaS offerings, the need to purchase a car is significantly reduced. This can result in less congestion and emissions, increased transit mode share, and freeing up land that would otherwise be used for parking.

The City of Toronto's progressive approach to the vehicle-for-hire sector is a critical step to making MaaS a reality, but global cities like Berlin are still ahead of the curve in enabling this transition. Considering the complex transit governance structure, municipal and provincial partners need to work together to support initiatives that facilitate open-loop payment and real-time journey planning.

Thank you for the opportunity to provide written comment to Council on the review of Municipal Code Chapter 546, Licensing of Vehicles-for-Hire and for your consideration. If you have any questions, please do not hesitate to contact me at ceo@bot.com.

Sincerely,



Jan De Silva
President & CEO
Toronto Region Board of Trade