



c/o The City Institute at York University
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Toronto, ON M3J 1P3

May 5, 2021

Marilyn Toft
12th floor, West Tower, City Hall
100 Queen Street West
Toronto, ON M5H 2N2

Dear Mayor Tory and Toronto's City Councillors,

It is my pleasure to write today in support of IE 21.7, Committee Recommendation 2 which states:

City Council request Transport Canada to regulate harmonized micromobility vehicle safety, standards, testing and labelling, and conduct robust consultation with key stakeholders on universal accessibility, active transportation and road safety, given the importance of consumer safety and protection, as well as clarity for businesses that manufacture, import, distribute, retail and provide insurance products for micromobility.

Recognizing that micromobility vehicles (small, lightweight vehicles such as pedal-assisted e-bikes, cargo e-bikes, folding e-bikes, e-trikes, e-mopeds, and standing electric kick-scooters) are increasingly used for daily, practical transportation on public roads and bike facilities, including for commuting purposes and carrying cargo for commercial deliveries, we fundamentally believe there is a critical need for Transport Canada to regulate micromobility device safety and standards.

Members of the public and companies are increasingly adopting or wanting to adopt micromobility for non-recreational purposes to do their part to achieve net zero emission objectives. Municipalities' public infrastructure, especially roads and their maintenance standards, were not designed for many of smaller devices being made available, and the lack of micromobility device safety standards and testing poses hazards for both users and non-users. When micromobility devices are not designed and tested for handling typical year-round surface conditions on roads and bike facilities, micromobility users instead use sidewalks or pedestrian paths, which endangers pedestrians especially people living with disabilities and seniors who use sidewalks out of necessity. The lack of adequate safety standards and testing of micromobility technologies results in significant liability risks and costs for businesses and Municipalities. Unsafe devices pose costs to the public health care system and lost productivity for riders and non-riders who are seriously injured as a result.

In the absence of the harmonized Federal regulation of micromobility vehicles, an inadequate patchwork of regulations across Provinces and Municipalities results in a lack of consumer safety, and significant confusion and hurdles for manufacturers, distributors and retailers and consumers. While Provinces and Municipalities may still choose to limit or prohibit the use of certain micromobility devices within certain spaces, it is vital that the safety of devices is not in question, especially when most of these devices are imported into Canada. There is a vital

regulatory role for Transport Canada, and its Multimodal and Road Safety Program, to play in order to ensure harmonized micromobility device safety, standards, testing and labelling exist to advance consumer safety, spur wider adoption of sustainable transportation, and boost Canadian innovation and economic developments within the micromobility sector.

Sincerely,

A handwritten signature in black ink that reads "Darnel Harris". The signature is written in a cursive style with a prominent horizontal line across the top of the name.

Darnel Harris (Executive Director)

Our Greenway Conservancy