To: Mayor Tory, members of the Toronto Accessibility Advisory Committee, and all of Toronto City Council
From: Walk Toronto (Steering Committee)
Date: February 24, 2021
Re: DI14.1 Electric Kick-Scooters (E-scooters) - Accessibility Feedback

---

Walk Toronto is a grassroots pedestrian advocacy group that works with various levels of government, community groups and citizens to improve walking conditions and safety in Toronto."

ELECTRIC KICK-SCOOTERS (E-SCOOTERS)

Electric kick-scooter ("e-scooter") sharing companies are looking to expand into Toronto. While Walk Toronto welcomes the advent of new, non-polluting forms of transportation, we continue to have serious concerns about the impact of e-scooters on pedestrians using the already-busy sidewalks. In this submission, we highlight accessibility and safety concerns, as well as other unintended impacts of adopting this technology and delivery model in our city.

Walk Toronto believes that our concerns, and those of the accessibility community, have yet to be adequately addressed. Walk Toronto does not believe it is currently advisable to proceed with an e-scooter pilot in Toronto, and recommends that the City of Toronto not proceed with a pilot.

INTRODUCTION AND BACKGROUND

The accessibility of Toronto's streets and sidewalks is a key consideration in everything that Walk Toronto advocates for. Walk Toronto works for more inclusive streets and believes that policies that impact our city's streets should improve safety and accessibility for all pedestrians. We encourage active transportation, in all forms, because it improves physical fitness and is especially valuable to those who are not capable of a higher level of exertion, such as through strenuous sports. We also appreciate the psychological benefits of walking, wheeling, and cycling, as they foster a sense of independence and self-reliance and reduce mental stress. During the COVID-19 pandemic, walking and adequate walking infrastructure have become even more vital.

On July 28, 2020, City Council considered item IE14.10, E-Scooters - A Vision Zero Road Safety Approach. The item included a June 24, 2020, staff report to the Infrastructure and Environment Committee titled "E-Scooters - A Vision Zero Road Safety Approach." The staff report included the following recommendations:

> City staff recommend that the Toronto Parking Authority (TPA) be authorized to serve as the provider of shared micromobility services to allow for the implementation of more safeguards

and better coordination with other municipal services, especially Bike Share. This approach would result in a competitive procurement process for shared e-scooters that complements Bike Share Toronto. The use and parking of e-scooters would continue to be prohibited in Toronto until such time that the TPA service has been contracted and City resources for enforcement are in place.

This report also recommends the need for improved industry standards at the provincial and federal levels for greater consumer protection in the purchase and/or use of e-scooters. While staff are aware that e-scooters are being considered as an open-air transportation option, the absence of improved standards and available insurance for e-scooter riders, coupled with lack of enforcement resources, would risk the safety of riders and the public on the City's streets and sidewalks, especially for people with disabilities.

Next steps are to commence development of an RFP by the TPA, with support by Transportation Services, and for City staff to report back in the first quarter of 2021 with an update on progress on opting into the pilot and proposed pilot by-law changes applicable to e-scooters (personal and shared) for an e-scooter pilot recommended for May 2021.

Council decided to refer the item to the General Manager, Transportation Services, and requested a report back with any changes needed to address the issues identified by the Toronto Accessibility Advisory Committee (TAAC), including issues related to insurance.

Walk Toronto appreciates that Transportation Services staff has been considering feedback from accessibility stakeholders and conducting further research regarding safety, accessibility, and insurance issues to develop its report back to the Infrastructure and Environment Committee and City Council.

Walk Toronto has earlier submitted comments on e-scooters:

- "Walk Toronto comments on regulating e-scooters," April 25, 2019: http://www.walktoronto.ca/2019/04/25/813/
- "Walk Toronto submits comments to the Province regarding e-scooters," September 24, 2019: http://www.walktoronto.ca/2019/09/24/walk-toronto-submits-comments-to-the-province-regarding-e-scooters/

After reviewing the additional information and research in the presentation prepared for the TAAC special meeting on February 25, 2021; information provided by Lime and Bird Canada; and from our own research, Walk Toronto concludes that the proposed solutions are still not adequate for pedestrians, and especially people with disabilities.

Even if a system requiring docking stations were to be adopted, to be overseen by the Toronto Parking Authority, there are still substantial unresolved issues, including the enforcement of a prohibition against riding on sidewalks or in crosswalks, standard device designs that do not include audible tones to alert people who are blind or partially sighted, insurance and liability, and safety for e-scooter users.

In addition, we are also concerned about precarious gig labour, the demands on City of Toronto staffing and resources, environmental sustainability and health, and inclusion and social equity.

ACCESSIBILITY AND SAFETY CONCERNS

Putting untrained operators on machines that can weigh as much as 45 kg, and that are capable of reaching speeds of up to 24 km/h, is a public safety concern and a hazard for all pedestrians, particularly for those with disabilities and other vulnerable road users. It is also a risk to users of e-scooters, and a risk they are unlikely to be fully aware of.

Sidewalk Riding

In cities where e-scooters have been introduced, e-scooters have had a detrimental effect on the comfort and safety of pedestrians, especially those with mobility disabilities and visual impairments. It is critical that people on e-scooters do not use the sidewalk to travel, nor use pedestrian crosswalks to cross intersections. E-scooters will move at higher speeds than pedestrians or joggers do, and the combination of momentum and weight will prove intimidating and dangerous to those on foot, especially those with mobility and visual impairments, seniors, and children.

Evidence from other cities that have allowed shared e-scooters is in line with our concerns. The Insurance Institute for Highway Safety (IIHS) published research studies in October 2020 that found that most e-scooter rider injuries happen on the sidewalk: "Nearly 3 out of 5 e-scooter riders were injured riding on the sidewalk – and about a third of these riders got those injuries in places where sidewalk riding is prohibited. Only about 1 out of 5 was injured riding in the bike lane, multiuse trail or other off-road location."[1] The City of Portland Bureau of Transportation (PBOT), in its September 2020 report on Portland's 2019-2020 Shared Electric Scooter Pilot, noted the following: "In 2019, PBOT staff issued 921 penalties and 60 warnings, costing companies over $20,000. Of these citations, 82% were for improper parking and 18% were for sidewalk riding. Most citations occurred in the Central City, where e-scooter ridership was highest."[2] And as *Cities Today* reported in November 2020, "In July the UK government launched e-scooter trials in select locations around the country, but issues quickly arose in some cities, with Coventry suspending its trial days after its introduction after users were seen mounting pavements and riding scooters in pedestrianised areas."[3]

For these reasons, the City must prohibit the use of e-scooters on sidewalks and in crosswalks. We want to emphasize that the current techniques deployed to stop sidewalk riding are not effective (e.g., geofencing, public education, ticketing), and the sidewalk detection technologies proposed by companies seem to be in their infancy and their ability to prevent sidewalk riding unproven.

Audible Tones

Members of the steering committee of Walk Toronto attended a Toronto E-Scooter Accessibility Roundtable – a virtual consultation – organized by representatives from both Lime and Bird Canada, on

[1] Insurance Institute of Highway Safety, "Most e-scooter rider injuries happen on sidewalk, study finds," October 15, 2020, https://www.iihs.org/news/detail/most-e-scooter-rider-injuries-happen-on-sidewalk-study-finds (accessed October 29, 2020).
[2] City of Portland Bureau of Transportation, *2019 E-Scooter Findings Report,* September 2020, https://www.portland.gov/sites/default/files/2020-09/pbot_escooter_report_final.pdf (accessed February 7, 2021), page 43.
[3] Christopher Carey, "'Silent' e-scooters fitted with artificial noise to warn pedestrians," November 4, 2020, https://cities-today.com/silent-e-scooters-fitted-with-artificial-noise-to-warn-pedestrians/ (accessed February 22, 2021).

November 5, 2020. Although the representatives were willing to learn from the accessibility community, it was apparent at that consultation that little thought had been given to the impact that their devices may have on people with disabilities. For example, how would blind pedestrians be alerted to the presence of e-scooters if they do not make a sound?

According to the November 2020 *Cities Today* article referenced earlier, "German micromobility firm TIER Mobility plans to fit its e-scooters with artificial warning sounds to alert blind and partially sighted people of their approach."[4] If e-scooters are permitted in Toronto, they must be required to emit audible tones at all times when ridden, so that others sharing the streets are aware of their presence, for everyone's safety. The effectiveness of this solution for blind pedestrians would still have to be evaluated. And, of course, for people with both vision and hearing loss, this solution may not be adequate.

Docking Stations

Any pilot or program where riders can leave e-scooters in random locations poses serious safety and accessibility concerns: the e-scooters become blockages and tripping hazards for pedestrians, representing a particularly significant danger for people who are blind or visually impaired and cannot see them, and an insurmountable barrier for those who use a mobility device and are impeded by a discarded e-scooter they cannot get around. E-scooters should never be left on the sidewalk, and instead should be required to have designated docking stations.

Toronto has been working hard to ensure that sidewalks provide enough space to meet accessibility standards, while allowing for space for sidewalk cafés and business marketing displays. That work would be undermined if, as has happened in other cities, e-scooters are left randomly or in clusters on the sidewalk or near curb ramps, by users who no longer need them, for gig workers to pick them up.[5]

Walk Toronto is not yet convinced by the proposal for Toronto to adopt a lock-to technology, whereby users will park their e-scooter by locking it with a cable to existing municipal infrastructure. This relies on users being able to distinguish municipal infrastructure from private or other infrastructure. And existing municipal infrastructure is already insufficient in some parts of Toronto for bicycle parking demands – be it bicycle parking rings, street poles, or other useable municipal infrastructure. We have doubts about the ability to easily monitor and immediately ensure compliance with e-scooter parking requirements through lock-to technology.

Walk Toronto also strongly suggests that e-scooter docking stations not be placed on sidewalks. We have observed that users of Bike Share Toronto will frequently ride on sidewalks when the docking station they are starting from or ending at is located on a sidewalk.

---

[4] Christopher Carey, "'Silent' e-scooters fitted with artificial noise to warn pedestrians," November 4, 2020, https://cities-today.com/silent-e-scooters-fitted-with-artificial-noise-to-warn-pedestrians/ (accessed February 22, 2021).

[5] "Farhad Rahmani, who owns a downtown dépanneur, says riders regularly leave the scooters outside his store. 'It's blocking my store. People can't get in,' said Rahmani. 'It's bothering me.' He says he has to go outside and ask the riders to leave the scooters elsewhere, and has considered calling the police." Colin Harris, "After one week on the road, Montreal 'not satisfied' with Lime e-scooters," *CBC News,* August 23, 2019, https://www.cbc.ca/news/canada/montreal/montreal-lime-electric-scooters-sidewalk-parking-app-fines-1.5257102 (accessed February 23, 2021).

Enforcement

It will be very difficult to enforce a prohibition against sidewalk/crosswalk riding or parking e-scooters in unauthorized locations. PBOT said as much in its findings report: "However real-time monitoring, compliance, and enforcement were sometimes a challenge because of staff capacity and because a regulatory permit fosters a 'regulator-regulated entity' relationship with the companies that cannot always be collaborative."[6]

One can anticipate that compliance with Ontario's additional operator and safety requirements – including such requirements as e-scooter users must be age 16 or older, bicycle helmet is required for those under age 18, no passengers are allowed, and no cargo may be carried – is likely to be low, and enforcement lax.

The City of Toronto has already indicated it lacks enforcement resources. Moreover, the discussions that the world has been engaging in about racial justice, and how enforcement is frequently carried out inequitably, lead Walk Toronto to worry about operations that are susceptible to high rates of non-compliance, which would require commensurately high levels of enforcement to ensure public safety. We appreciate the same can be said for other motorized travel modes.

Insurance and Liability

Accountability for potential hit-and-runs on sidewalks is essential. Any pilot (and eventual by-laws) must address liability insurance in the case of e-scooter users causing a collision with and injuring pedestrians or cyclists (or pets or motor-vehicle drivers). While private operators such as Lime and Bird Canada may have limited liability insurance, their e-scooter users are also required to agree to a waiver that has the users assume responsibility. An injured pedestrian may be unable to identify an e-scooter user whom they cannot see or who rides away.

Moreover, an e-scooter user may not be adequately insured in the event they cause an injury to someone else. This is a risk for the e-scooter user, as well as for any injured party if the e-scooter user responsible for the injury is unable to pay out a claim. Insurance coverage must be provided by the e-scooter companies to ensure compensation for third-party injuries.

In the case of injury where e-scooters are left on sidewalks, liability should also be on the specific service provider of a dockless system, given the difficulty of enforcing parking violations.

The City of Toronto may also open itself up to an increase in liability claims from e-scooter users who are injured because of a lack of safe infrastructure for e-scooters (such as connected bike lanes), or who injure themselves or others as a result of riding over uneven or poorly maintained road surfaces; or from third parties injured by e-scooter users who are unable to pay damage claims.

Safety for E-scooter Users

E-scooter user safety is a grave concern because of device design and standards, roadway conditions and street design, insurance, and liability. Reports abound of the serious injuries experienced by users worldwide of e-scooter share services. Shared e-scooters attract many new users, and it is new users

[6] City of Portland Bureau of Transportation, *2019 E-Scooter Findings Report,* September 2020, https://www.portland.gov/sites/default/files/2020-09/pbot_escooter_report_final.pdf (accessed February 7, 2021), page 48.

who find themselves injured most often. Unfamiliarity with the device, lack of knowledge of the rules of the road, non-compliance with safety requirements, unsafe operation, distracted riding, uneven or poor roadway conditions, lack of safe riding infrastructure, sidewalk riding, faulty equipment – all these can contribute to falls, collisions, and injuries.

If e-scooters sharing services are permitted to operate in Toronto, users of these devices are likely to assume that the City has deemed their operation safe. Yet the users are akin to guinea pigs for this new mobility form factor. And "frictionless" sign-up through a phone app means new users can quickly agree to a waiver they haven't read and without knowing the consequences of what they've agreed to. As mentioned above, do users know whether they have liability insurance in the event they injure someone while riding an e-scooter? Or will they be prepared for uneven or irregular road (and sidewalk) surfaces that were not intended for the combination of speed, smaller wheels, and instability of e-scooters? Will new or infrequent users educate themselves on the safety requirements and rules of the road?

OTHER CONCERNS

Walk Toronto is also concerned about other consequences of this technology, including work conditions for gig labour, and the additional need for City staffing and resources, environment and health impacts, and equity and inclusion.

Precarious Gig Labour

Private e-scooter sharing companies are known to rely on "independent contractors" – that is, gig, temporary, and contract workers – who are responsible for finding, picking up, charging, and dropping off e-scooters. Known as Bird Chargers or Lime Juicers, they usually use their own motor vehicles to collect the e-scooters and charge the e-scooters overnight on their own power supply. Their work is precarious. In February 2020, *Vice* reported that Lime had suddenly slashed its pay rates to juicers:

> Lime, the shared mobility company specializing in electric scooters, pays thousands of independent contractors to charge its scooters overnight to ensure the scooters have enough battery to get through a day of scooting.
>
> But, despite raising $765 million in less than three years, the company is facing a rumored cash crunch that has resulted in raising prices and laying off employees. Now, Lime is also slashing rates for its scooter chargers, called juicers, who are not employees but independent contractors under a typical gig economy arrangement.
>
> In some cases, Lime reduced the per-scooter fee paid to juicers so much that few people are even bothering to scoop up the scooters. For example, in the last week, juicer fees in Oakland fell below $4 per scooter, according to a post on Indybay and confirmed by comments in a Reddit forum for Juicers, down from $8 or more in previous months. In Paris, Lime used to pay freelancers as much as 20 Euros per scooter, then slowly brought that down to 5 Euros, before ending the use of juicers altogether. With the rates so low, few juicers appear to be bothering to charge them.[7]

[7] Aaron Gordon, "Lime Has Slashed Pay Rates for Scooter Chargers So Much People Have Stopped Doing It," *Vice,* February 19, 2020, https://www.vice.com/en/article/pkez8v/lime-has-slashed-pay-rates-for-scooter-chargers-so-much-people-have-stopped-doing-it (accessed February 22, 2021).

Not only does this model make workers vulnerable, it makes the e-scooter system vulnerable. Toronto needs to carefully consider whether it wants to perpetuate precarious labour.

City Staff and Resources

In addition to relying on gig workers, these private companies also profit from public space and infrastructure, for which they don't pay. Lime promotes e-scooters as "solutions that are free to the city"[8] – yet they are not free. They demand much City staff time and public resources.

Also, for any program to work, the City would also need to address issues of inadequate infrastructure (including road maintenance), liability, and enforcement, as discussed earlier. Accountability in the case of injuries, and potential costs to the City, should also be an important consideration.

City staff would have to evaluate the program and audit operations, and these companies will need to be required to share data with the City.

Environment and Health Impacts

E-scooters are often touted as a sustainable, non-polluting mode of transport. Yet the environmental sustainability of e-scooter sharing services should be closely scrutinized from a number of perspectives, including the device's life cycle emissions and whether e-scooters are replacing car trips or low-carbon modes.

Environmental praises of these devices disregard concerns about the carbon footprint of producing them; the materials they use; how long they actually last; and fossil-fuel use in collecting, charging, and redistributing e-scooters by motor vehicles. For example, a life cycle assessment (LCA) conducted by Joseph Hollingsworth, Brenna Copeland, and Jeremiah X Johnson found the following:

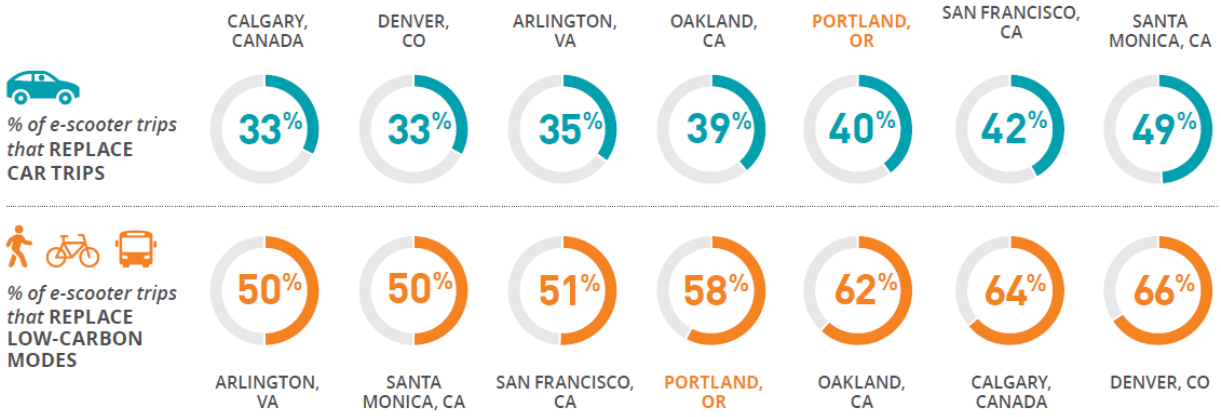
> These results show that dockless e-scooters consistently result in higher life cycle global warming impacts relative to the use of a bus with high ridership, an electric bicycle, or a bicycle per passenger-mile traveled. However, choosing an e-scooter over driving a personal automobile with a fuel efficiency of 26 miles per gallon results in a near universal decrease in global warming impacts. …
>
> In this study, we found that the global warming impacts associated with the use of shared e-scooters are dominated by materials, manufacturing, and automotive use for e-scooter collection for charging. Increasing scooter lifetimes, reducing collection and distribution distance, using more efficient vehicles, and less frequent charging strategies can reduce adverse environmental impacts significantly. Without these efforts, our Base Case calculations for life cycle emissions show a net increase in global warming impact when compared to the transportation methods offset in 65% of our simulations. Taken as a whole, these results suggest that, while e-scooters may be an effective solution to urban congestion and last-mile problem, they do not necessarily reduce environmental impacts from the transportation system.[9]

---

[8] Jonathan Hopkins, Director, Strategic Development, Canada and North West United States, Lime. Email to Infrastructure and Environment Committee, City of Toronto, July 9, 2020, IE.New.IE14.10.16, https://www.toronto.ca/legdocs/mmis/2020/ie/comm/communicationfile-108548.pdf (accessed February 23, 2021).

[9] Joseph Hollingsworth, Brenna Copeland, and Jeremiah X Johnson, "Are e-scooters polluters? The environmental

Various city findings and studies also indicate that although e-scooter use can replace a significant portion of car trips (private car, taxi, and ride-hailing), in reality it usually replaces a higher portion of low-carbon trips (walking, cycling, transit, and no trip). In its *2019 E-Scooter Findings Report,* PBOT displayed the following graphic, in which one can see that for the seven North American cities listed, the percentage of e-scooter trips that replaced car trips was always lower than the percentage of e-scooter trips that replaced the low-carbon modes of walking, cycling, and transit.[10]



In "To scoot or not to scoot: Findings from a recent survey about the benefits and barriers of using E-scooters for riders and non-riders," Rebecca L. Sanders, Michael Branion-Calles, and Trisalyn A. Nelson surveyed 1,256 university staff in Tempe, Arizona, on e-scooter use:

> When asked which mode they would have used for their last trip had an e-scooter not been available, approximately 25% of respondents stated that they would have used a car (personal or ride hail/taxi), while 65% stated that they would have walked (57%) or biked (8%). Although this varied by trip type (e.g., 62% of transportation to/from work trips would have been accomplished by walking, compared to only 42% of the shopping/running errands trips), it is clear that the majority of e-scooter trips would have been taken by walking.[11]

If e-scooter trips are replacing a high percentage of active transportation trips, we must examine any potential health impacts. And, of course, the health impact from injuries linked to e-scooters has already been raised.

Equity and Inclusion

E-scooters share services could provide a useful transportation option for some populations in Toronto who are currently underserved, if the equipment, system, service, pricing, hiring practices, and key

---

impacts of shared dockless electric scooters," *Environmental Research Letters* 14 084031 (August 2019), https://doi.org/10.1088/1748-9326/ab2da8 (accessed February 23, 2021), page 9.

[10] City of Portland Bureau of Transportation, *2019 E-Scooter Findings Report,* September 2020, https://www.portland.gov/sites/default/files/2020-09/pbot_escooter_report_final.pdf (accessed February 23, 2021), page 26.

[11] Rebecca L. Sanders, Michael Branion-Calles, Trisalyn A. Nelson, "To scoot or not to scoot: Findings from a recent survey about the benefits and barriers of using E-scooters for riders and non-riders," *Transportation Research Part A: Policy and Practice,* Volume 139, 2020, Pages 217-227, ISSN 0965-8564, https://doi.org/10.1016/j.tra.2020.07.009.

performance indicators are designed with the objectives of social equity, racial justice, and inclusion in mind. Where will the e-scooters be distributed and how? Who will be able to afford the service? Will Black, Indigenous, and people of colour feel at risk, or targeted for racial profiling, while renting or using e-scooters? Does the device design serve people with disabilities, the elderly, youth, or parents with young children? Would a better option be to put more time and effort into devices that can serve the accessibility community? Who will benefit from e-scooter sharing and who may be left further behind?

CONCLUSION

E-scooter sharing services pose significant safety risks to pedestrians with or without disabilities, and inexpert or irresponsible users of these devices can be dangerous to other road users and to themselves. Having considered these concerns, along with the other concerns outlined above, Walk Toronto recommends not introducing electric kick-scooters to Toronto's streets.

During the Toronto E-Scooter Accessibility Roundtable with Lime and Bird Canada, participants expressed many apprehensions and shared instances of fast-moving e-scooters having caused significant injury to family members. When confronted with those cases, the private companies argued that those users of individually-owned e-scooters pose more of a problem than users of shared e-scooters, as the shared e-scooters will have a governor, or speed limiter, for example. We think that the opposite may be the case; it would be easier for a city to deal solely with allowing individually owned electric kick-scooters. First, as seen in other cities, such as Montreal,[12] e-scooter sharing services are likely to result in numerous devices left lying in the sidewalks and public realm; in contrast, individual e-scooter owners, similar to people who ride their own skateboards or longboards, are unlikely to leave their devices lying in the public realm. Moreover, many users of shared services will be novices, and unlikely to wear helmets.[13] People riding their own e-scooters are much more likely to learn rules of the road, buy and wear a helmet, and learn how to ride more safely than someone trying out a shared unit for fun or convenience.

But if the City were to adopt a shared e-scooter pilot to encourage micromobility uptake more widely, it should require the following at a minimum:

[12] Montreal banned shared, dockless e-scooters in the city for 2020 following its summer 2019 pilot project. During the pilot, e-scooters "were only parked in their designated zones 20 per cent of the time. 'Eight e-scooters on 10 did not respect our rules… which led to problems,' [Councillor Éric Alan] Caldwell said. 'Security issues. Issues for other modes of transportation, be it pedestrians, cyclists, or drivers. Issues that led to disorder in the city.'" Canadian Broadcasting Corporation, "Shared e-scooters to be banned in Montreal in 2020," *CBC News,* February 19, 2020, https://www.cbc.ca/news/canada/montreal/scooters-banned-1.5468206 (accessed November 17, 2020).

See also Colin Harris, "After one week on the road, Montreal 'not satisfied' with Lime e-scooters," *CBC News,* August 23, 2019, https://www.cbc.ca/news/canada/montreal/montreal-lime-electric-scooters-sidewalk-parking-app-fines-1.5257102 (accessed February 23, 2021).

[13] "Montreal police also issued 333 tickets to e-scooter users for not respecting the Highway Safety Code, according to the report. Tickets for not wearing a helmet accounted for 324 of them." Canadian Broadcasting Corporation, "Shared e-scooters to be banned in Montreal in 2020," *CBC News,* February 19, 2020, https://www.cbc.ca/news/canada/montreal/scooters-banned-1.5468206 (accessed November 17, 2020).

- Riding on sidewalks or crosswalks must be prohibited, with compliance targets set, active monitoring for compliance, metrics provided by operator, and mechanisms put in place for reporting non-compliance that people with disabilities can easily access.
- E-scooters must be docked into physical stations, to help reduce trip hazards, accessibility barriers, and cluttered sidewalks.
- E-scooters must be required to emit audible tones at all times when ridden, so that others sharing the streets are aware of their presence, for everyone's safety.
- Insurance and liability must be addressed, especially compensation for third parties injured by an e-scooter rider or an e-scooter trip hazard.
- Equity and inclusion must be built into the program, with key performance indicators. We encourage Toronto to look at Portland's pilot findings reports for learnings and to seek out other promising practices so that inequities are not furthered by e-scooters.

We also urge consideration of the following: e-scooter share companies' typical reliance on gig labour to recharge and redistribute e-scooters; evaluating environmental sustainability using a life cycle assessment, including whether e-scooter trips are replacing active and sustainable transportation modes; enforcement; the demands on City of Toronto staffing and resources; and e-scooter user safety.

In addition, Toronto may want to look at very different e-scooter designs, such as one that much more resembles a bicycle and could be made subject to the same rules as pedal-assist bikes or e-bikes (pending reclassification by the Ontario government), depending on its specifications. According to the European Transport Safety Council, the city of Roermond, in the Netherlands, has begun a trial with these electric kick-scooters from Citysteps:

> The Netherlands classifies e-scooters in the same category as other motor scooters, and as such they are subject to type-approval by RDW, the Dutch type-approval authority. The vehicles that have been approved for the trial do not look like most e-scooters from rental companies such as Lime and Bird. They feature large bicycle-type wheels and handlebars which should greatly increase stability.[14]

Finally, Walk Toronto would recommend that the City devote time and resources instead into investigating "e-scooters" that are more stable and would better serve people with a range of disabilities. Indeed, Lime is promoting seven adaptive vehicles it recently developed to make its services more accessible.[15] Such adaptive designs may not align with the current Ontario e-scooter pilot regulations, in which case Toronto should wait out this pilot program.

Thank you,
Daniella Levy-Pinto, Vivien Leong, Michael Black, Adam Cohoon
On behalf of Walk Toronto
Email: info@walktoronto.ca Website: www.walktoronto.ca

---

[14] European Transport Safety Council, "UK and Netherlands go in different directions on e-scooters," August 15, 2020, https://etsc.eu/uk-and-netherlands-go-in-different-directions-on-e-scooters/ (accessed February 21, 2021).
The Citysteps electric kick-scooter website is found here: https://citysteps.app/?lang=en. A video of the system is available here: https://www.youtube.com/watch?v=usnHNblwjD8&feature=emb_rel_end.

[15] Adele Peters, "These 7 new accessible vehicles let people with disabilities access micromobility," *Fast Company,* February 18, 2021, https://www.fastcompany.com/90605847/these-7-new-accessible-vehicles-let-people-with-disabilities-access-micromobility (accessed February 19, 2021).