

MEMORANDUM

TO: General Government and Licensing Committee Members
SUBJECT: GL27.19: Update on Outstanding Vehicle-for-Hire Directives
DATE: November 26, 2021

Uber Canada welcomes the opportunity to provide comments on *GL27.19: Update on Outstanding Vehicle-for-Hire Directives*. Staff has provided a comprehensive, evidence-based update on the vehicle-for-hire industry and has provided a roadmap for the industry to evolve in the coming years. However, with Council's decision on November 10, 2021, over 1,100 Torontonians are unable to become licensed as PTC drivers at this time even though they have met all of the provincial and municipal requirements.

Uber fully supports the Driver Training Accreditation Program and is committed to working with third-party training providers to get drivers through the training as soon as the City reviews applications and approves training providers. We are hopeful this can be done on an expedited basis given the seriousness of this matter and the "unintended effects" (p. 21)¹ that this situation has on the City of Toronto.

Uber encourages Committee members to:

- **Support the evidence-based Staff recommendations in *GL27.19: Update on Outstanding Vehicle-for-Hire Directives*; and,**
- **Direct Staff to accelerate the rollout of the Driver Training Accreditation Program by reviewing applications on a rolling basis and providing a response to all applicants by January 1, 2022.**

The recommendations in the Staff Report represent evidence-based policy approaches that balance the needs of Torontonians, the various participants in the industry, and the realities that COVID has created. In particular, the City's commitment to working collaboratively with academic, non-profit, and industry stakeholders to tackle the transition to EVs is very much aligned with Uber's work in this space.

Uber's Commitment to Sustainability

Recommendations 2–4 are concrete and substantial steps to transitioning the entire vehicle-for-hire industry as the City of Toronto works towards its TransformTO objectives. In late 2020, Uber made a global commitment to enable 100% of passenger trips in zero-tailpipe

¹ Staff suggests the effects of the pause are "Reducing the number of drivers available and increasing wait times." (p. 21) and "Lost economic opportunities for prospective applicants, and significant effects on newly licensed owners and/or companies, as they cannot employ drivers and therefore, cannot operate." (p.21)

emission vehicles (e.g. battery EVs), on micromobility and public transit: by 2030, in U.S., Canadian, and European cities with supportive policies; by 2040, globally. This is an ambitious target and one that we have taken immediate steps to reach in the City of Toronto including:

- **Uber Green** - Uber Green is a low-emission ride option that connects riders with drivers using hybrid and fully electric vehicles. The driver fare is increased to incentivize low-emission vehicle (LEV) and zero-emission vehicle (ZEV) adoption, and to offset short-term increased costs of LEVs and ZEVs. Since September 2020, Uber Green has been available in the City of Toronto to give rides an additional low-emission ride option. Each Uber Green trip in a hybrid or electric vehicle produces at least 25% fewer carbon emissions than the average trip.
- **Supporting Drivers' Fair Transition to EVs** - We've committed \$800 million in resources to help hundreds of thousands of drivers transition to EVs globally over the next five years. In order to achieve the TransformTO goal of 100% of transportation sources using zero-carbon energy sources by 2050, the vehicle for hire industry in Toronto will need to evolve.
- **Investing in Multimodal Transportation** - As part of our sustainability commitment, Uber is investing in our multimodal network to provide sustainable alternatives to personal car ownership. Through a feature in the Uber app called Uber + Transit, customers in Toronto are among the first in the world to be able to see how ridesharing can be a "first-mile / last-mile solution" to complement municipal and regional public transit.² Riders already say that 1 in 14 of their Uber trips connect with public transit and this number is likely to increase going forward through products such as this.³

Accelerate Driver Training

The timely and ongoing rollout of driver training has been of the utmost importance to Uber Canada, and an area we have urged Municipal Licensing & Standards to prioritize and accelerate. As per the Staff Report, there are "unintended effects" (p. 21) associated with Council's decision to pause the issuance of new licenses until a program is established. These include:

- "Reducing the number of drivers available and increasing wait times." (p. 21)
- "Lost economic opportunities for prospective applicants, and significant effects on newly licensed owners and/or companies, as they cannot employ drivers and therefore, cannot operate." (p.21)

MADD Canada has expressed their concerns with Council's decision and have called on Council to ensure ridesharing is available to Torontonians particularly after they have been

² For more information and to see what this looks like in the Uber app, see https://twitter.com/Uber_Canada/status/1453774058542170112.

³ As per Uber Canada Impact Report, <https://ubercanada.publicfirst.co/>.

consuming alcohol or drugs.⁴ Since the pause in licensing, over 1,100 people have been denied the opportunity to work in Toronto due to Council's decision. Based on a survey conducted of these individuals and others who were in the process of signing up to work, to which a subset responded:

- 35% had recently lost their job or had their hours reduced at work;
- 52% said they wanted to drive because they enjoy driving and supporting their community; and,
- 83% self-identified as Black, Indigenous or People of Colour (BIPOC).

With the Call for Third-Party Training Providers closing on December 10, 2021, the focus should be on reviewing and approving applications on a rolling basis and providing a response to all applicants by January 1, 2022. Successful applicants should be able to launch right away and begin to offer training to drivers who meet the requirements. This is in the best interest of passengers, drivers, and the local businesses that are supported by the VFH industry.

Evidence-based Policy

The recommendations in the Staff Report are grounded in the comprehensive data that the PTC industry provides to the City of Toronto. As per the *Transportation Impacts of Vehicle-for-Hire* report, PTCs continue to provide the following datasets:

- **Trip Records:** Locations of pick-up and drop-off, and trip timestamps, are required by the City to be precise. The fare paid must be included. A unique identifier for the vehicle is required and vehicle identification numbers (VIN) are provided.
- **Driver Availability Records (Period 1):** In order to understand the complete impact of driver activity on the City's streets, the City requires data about where drivers spend time between trips waiting for trip requests.
- **Collision Records:** The location, timestamp, and VIN of any PTC vehicle involved in a collision is required.

As Staff note, their report is not a complete picture given that other VFH industry participants do not provide complete datasets. With this caveat, based on the data provided by PTCs to the City of Toronto, Staff at Transportation Services are still able to make a number of findings, including:

- **Growth in PTC trips slowed pre-pandemic** - As per the Transportation Impact report, "Year-over-year growth was 5% from January 2019 to January 2020, compared to 70% the previous year from January 2018 to January 2019." (p.9)

⁴ Full press release can be found here:

<https://www.globenewswire.com/news-release/2021/11/16/2335255/0/en/MADD-Canada-Raises-Concerns-About-Toronto-City-Council-Decision-to-Halt-Rideshare-Driver-s-Licences.html>

- **Average PTC vehicle operates 4 hours per day** - This is a critical finding which is consistent with the fact that the majority of PTC drivers have other responsibilities, including full-time and part-time work, caregiving responsibilities, or education. The ability to earn on a PTC platform helps them supplement their income.

Conclusion

Uber Canada appreciates the opportunity to comment on *GL27.19: Update on Outstanding Vehicle-for-Hire Directives*. Please let us know if you have any questions or require further information on any point contained within this document.

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