



October 10, 2023

Toronto City Hall
100 Queen Street West
Toronto, Ontario
M5H 2N2

RE: Item ECDC6.6 - Transitioning the Vehicle-for-Hire industry to Net Zero emissions by 2030

Dear Mayor Chow and members of Toronto City Council:

Toronto Environmental Alliance supports Council's overall direction to transition the Vehicle-for-Hire (VFH) industry to zero emissions vehicles (ZEVs) by 2030.

However, as City Council addresses this transition we would like to stress that our TransformTO goals call for 75% of all trips under 5km to be outside of private vehicles by the year 2030, including Vehicles-for-Hire. To reach that goal, much more must be done to incentivize transit, cycling, and walking over private vehicle use. Prioritizing a shift to non-vehicle forms of transportation will have a substantially greater impact on reducing carbon emissions, addressing traffic congestion, supporting affordability, and benefitting resident health.

TEA also recognizes that drivers for app-based, Private Transportation Companies like Uber and Lyft (PTCs) are some of the most precarious workers in the city. Under the business model operated by PTCs, drivers are expected to shoulder almost all the costs of the necessary transition to low carbon vehicles. **We join the Toronto Atmospheric Fund in urging the City to ensure barriers identified by drivers to acquire and operate suitable zero-emissions vehicles on this timeline are addressed.** One such barrier is the need for more public charging stations. This includes the need for more public overnight charging stations, as well as more Level 3 fast charging stations capable of charging 350km+ range ZEVs in less than an hour. Currently, there are only a handful of Level 3 fast charging stations in Toronto.

The recommendations before you include providing grants to incentivize early adoption of ZEVs in the Vehicle-for-Hire industry. **TEA encourages City Council to ensure that grants meant for the conversion of the Vehicle-for-Hire fleet actually result in the conversion of the fleet.** As currently proposed, we believe that grants to taxi companies are likely to result in the conversion of the taxi fleet to ZEVs. We are less certain that proposed grants directed to app-based PTCs like Uber and Lyft will directly lead to the conversion of the fleet to ZEVs. We strongly encourage the City to do its utmost to ensure the proposed ZEV grants to PTCs subsidize local drivers, and not the corporation, and do not unintentionally lead to incentivizing an overall increase in the number of vehicles on the road. **Due to these concerns, we support the Committee's amendments directing staff to gather the necessary information to ensure these substantial City funds will work as intended, to reduce the up-front cost burden for drivers, and to encourage fleet conversion.**

We would also support the City of Toronto considering different grant distribution timelines and delivery systems that treat taxicabs and PTCs separately, as they are already subject to different licensing requirements and their payment structures operate quite differently.

In conclusion, we support Council taking the necessary steps forward to transition Vehicle-for-Hire fleets to zero emissions vehicles, and we encourage Council to take the time necessary to ensure that city programs directly support impacted workers and will effectively achieve the VFH ZEV targets. Additionally, we would like to emphasize that the key way of reaching Toronto's broader 2030 Net Zero targets is to prioritize non-vehicle forms of transportation – walking, cycling, and transit.

Sincerely,



How-Sen Chong
Climate Campaigner
Toronto Environmental Alliance