



September 20, 2023

Economic and Community Development Committee  
Toronto City Hall  
100 Queen Street West 10th Floor, West Tower  
Toronto, ON, M5H 2N2

**RE: Transitioning the Vehicle-for-Hire Industry to Net Zero Emissions by 2030**

Dear Committee:

The Toronto Region Board of Trade (the Board) is pleased to contribute its perspectives to the Committee's consultation on *Transitioning the Vehicle-for-Hire Industry to Net Zero Emissions by 2030*.

The Board strongly supports the target of all vehicles-for-hire being zero-emissions by 2030. This goal, shared by industry, environmental groups, and now before City government, will make Toronto the North American leader in reducing emissions in the vehicle-for-hire industry—and, by extension, a leader in zero-emissions vehicle (ZEV) adoption more broadly.

It must be recognized that such an ambitious target also brings challenges. Drivers can only make the transition if ZEVs are available and affordable, and if the same can be said for their refuelling and/or recharging infrastructure. Additional measures proposed by City staff will help with these considerations, including reduced licensing fees for ZEVs, support for charging infrastructure, and vehicle transition provisions. But more can be done.

Supported by The Atmospheric Fund (TAF), the Board is leading a [SuperCharge Initiative](#) to identify how municipalities in the region can accelerate ZEV adoption. A coalition of public, private, and not-for-profit organizations are supporting this work, including Uber.

Based on insights gathered from this initiative, the Board recommends the Committee consider the following steps to support the ambitious mandate for the vehicle-for-hire industry to transition to net zero emissions by 2030.

**1. Lead rapid expansion of public charging infrastructure.**

To support a 100% ZEV vehicle-for-hire sector, the City projects between 2,446-3,449 Level 3 chargers are needed. This is compared to only 198 Level 3 chargers today, creating an urgent infrastructure need.

The City is currently consulting on its [EV Public Charging Network Study](#), intended to “guide provision of publicly accessible EV charging infrastructure across Toronto between 2025 and 2040.” It will be important that this study lay out an approach to the types of chargers being installed, the location and placement of the charging infrastructure, and the financing



required to build out a cohesive charging network. It is also essential that the study emphasizes the need for collaboration between public, private, and not-for-profit and community partners in the implementation of the strategy.

If the vehicle for hire industry is to meet its 2030 targets, there is an urgent need and onus on the City to increase public charging infrastructure at a rapid pace.

## **2. Leverage data provided by vehicle-for-hire companies to guide the deployment of supportive infrastructure.**

The City requires vehicle-for-hire companies to submit extensive data on rides taken through their services, including routes, destination, and vehicle type. This data provides an incredible trove of information that can support decisions such as where best to locate public chargers.

The City should be using this data to guide decision making, but to date it has been underutilized. To support the new ambitious ZEV mandate, the City should consolidate the reporting into a database that supports an evidence-based approach to designing a reliable charging network for the vehicle-for-hire industry.

## **3. Foster collaboration with all levels of government to increase ZEV adoption.**

Supporting ZEV adoption in the City of Toronto requires collaboration and cooperation with other levels of government. The City should call on other levels of government to support the transition by offering incentive programs that make the transition to ZEVs easier for drivers, as well as ensuring the region has the electrical grid capacity to support increased charging needs.

The Board appreciates the opportunity to provide our perspective on this consultation. If you have questions or would like to discuss further, please do not hesitate to contact our team. We would also be pleased to convene our partners in the SuperCharge Initiative for a cross-sectoral roundtable on these items.

Sincerely,

David Campbell  
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Toronto Region Board of Trade