

## Briefing Note

# City of Toronto Two-Stroke Engine Proposed Ban

Nov 29, 2023

## Introduction

Landscape Ontario represents over 3,000 landscaping companies in Ontario, employing over 80,000 individuals. We, alongside our members, are committed to a green future and the continuous improvement of the landscape and horticultural industry, which contributes \$5.4-billion to our provincial economy every year. As an organization listed in your June 21, 2023 [report](#) as a partner for consultation, we look forward to working in partnership with council to find a solution that benefits the environment, the residents of Toronto and the members we serve.

## Professional Landscape Industry = Frontline Climate Action

We are an industry that cares deeply about sustainability. Every day, our members work with homeowners, businesses, and communities to plant trees, create and maintain green spaces that improves air quality for all. Climate change is upon us, we see the effects of it in our very seasonal industry. It is the professional landscape horticulture industry that are the front line climate action workers who are making a difference every day.

Our members and associated equipment companies are among those driving the development and adoption of greener tools and practices. That said, based on several factors including the current quality, availability and cost associated with making the switch to battery-powered equipment, we believe a full ban of two-stroke gas powered engine equipment at this time is premature.

An outright ban would only penalize the thousands of business owners in the landscaping trades and we believe that a phased approach is the best way forward as we all work toward a greener future.

## The Case for a Phased Approach

We advocate a phased approach in order to ensure a smooth and practical transition for the landscape industry. A gradual and well-managed process would allow businesses to allocate the sufficient time and resources needed to adapt — minimizing disruptions in service and potential economic burdens to business owners, private property owners, and individual residents.

## Gradual Adaptation

A phased approach allows landscape businesses to gradually replace their two-stroke equipment with more sustainable alternatives, avoiding abrupt changes that could strain their operations and finances. With the typical



lifespan of equipment sitting around three years, this process would be relatively swift as landscaping company owners — most of whom are starting to invest in greener options — are constantly replacing equipment as it ages out.

### **Market Readiness**

We are committed to the adoption of green technology including battery-operated equipment. Landscape Ontario is currently participating in a large-scale study led by The National Association of Landscape Professionals and Auburn University, with participation from state and provincial nursery and landscape associations all over North America, examining the commercial viability for battery powered equipment across the industry. The goal is to ensure that when we do make the recommendation to businesses that it's time to make the switch, that it's viable to do so. What we are hearing so far is that while manufacturers are continuing to make great strides, we're not there just yet.

### **Workforce Safety & Training**

The phased approach facilitates comprehensive training programs for landscape professionals to familiarize themselves with new equipment, enhancing safety and productivity. It also allows for more innovation to keep workers safe — for example the weight of current 'backpack' style battery-powered leaf blowers is significantly more, which increases the risk of injury to crew members. Like all skilled trades, the landscape trades is experiencing a serious labour shortage, making it increasingly difficult to conduct business. An immediate ban would be one more significant hurdle for the industry in a difficult time.

### **Economic Considerations**

A gradual transition can alleviate financial burdens on businesses by spreading the cost of replacing equipment over a more extended period, preserving industry stability.

Let's take the example of leaf blowers. On average, a commercial or residential landscaping crew would have two leaf blowers per crew. The cost of purchasing a new battery-powered blower would cost approximately 50% more than replacing it with a gas-powered blower. With a phased approach, business owners would be able to replace blowers as they age out (the average lifespan being approximately three to five years) vs replacing an entire fleet at a 50% premium. In addition to the cost of the equipment itself, business owners will also need to invest in a significant number of extra batteries to power crews for long days on the road with limited charging options — this may also create a need to make adjustments and improvements to current fleet vehicles.

Adding to the challenge of an outright ban, most maintenance contracts typically run three years — meaning there would be no way of raising prices in the near term to subsidize an immediate transition. A more considered phase out would give business owners the ability to spread out the cost and adjust pricing accordingly.



### **Supply Chain**

While we are all committed to transition, the realities of supply chain must be kept in mind. We have members who have waited eight months or more to equip a single crew this summer (in this case equipment didn't arrive until four months into the season) and the supply remains extremely limited. The process of switching entirely over to professional-caliber battery powered and electric equipment will take time. We are committed to getting there and we appreciate being part of this important conversation with the City of Toronto.

### **Conclusion**

We believe that a well managed phase out over time is the best way forward for the professional landscape horticulture industry and for homeowners alike. Significant costs to fleet changeover, changes to standard operating procedures, battery run-time, and aversions to bans are all factors to consider as the City of Toronto continues to study the impacts of what a proposed ban on two-stroke engine powered equipment would look like. We recommend further consultation with the professional landscape horticulture trades and other construction trades as the City of Toronto continues to evaluate a ban on this type of equipment.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Joe Salemi", is positioned above the printed name.

Joe Salemi, CAE  
Executive Director  
Landscape Ontario Horticultural Trades Association