

From: [Kristine](#)
To: [Budget Committee](#)
Cc: abdul@co-opcabs.com; [Gurjeet Dhillon](#)
Subject: [External Sender] Toronto Taxi Industry Pre-Budget Consultation Comments 2023
Date: November 30, 2023 3:09:32 PM
Attachments: [2023 Budget Comments Toronto Taxi Industry.pdf](#)

Good afternoon,

Please find attached and below, our submission for the 2023 Pre-Budget Consultations.

Thank you,

Kristine

Kristine Hubbard

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November 30, 2023

Dear Budget Committee members,

We welcome the opportunity to submit comments for consideration as you put together a proposed budget that meets the needs of Torontonians.

Licensed taxis have helped Torontonians move around the city for 60 years; however, following the de-regulation of the industry in 2016, council created an operating environment unfairly favourable to ride-share tech companies. As a result, taxi owners and operators have had their incomes plummet. We understand that near the end of 2024, council will have another opportunity to level the playing field and ensure the industry is regulated in the public interest, including ensuring drivers can have a reasonable chance at making ends meet.

Ahead of this review, it will be important for Council to take steps, outlined below, to mitigate the impact of unfair bylaws on taxicab owners and operators.

The need for action to protect wheelchair accessible transportation is particularly acute, where the regulatory and operating environment has made it difficult to retain and recruit drivers, and where a fleet of aging vehicles requires imminent replacement.

There are several measures you can take in this interim period to help individuals and small

businesses providing taxi and accessible transportation services:

License fees:

In Toronto, taxi owner and operator license fees have remained high even though the City-provided services they fund (training, inspections) have declined since 2016. A 2021 review of Toronto’s license fees found that comparable licenses in some large cities were substantially lower (e.g., a standard taxi owner license in Vancouver \$155 versus full Toronto fees of approximately \$1000). Taxi industry participants are still struggling against the twin impacts of unfair regulation and pandemic-related demand changes. We recommend:

- No increase to current (“discounted”) licensing fees until by-laws contributing to driver poverty and precarity are addressed;
- An audit (not an estimate) of MLS operations to understand how funds are deployed for licensing administration, bylaw enforcement, policy reviews, and operational programming, to help understand how licensing costs could be brought in line with other large cities charging more modest licensing fees.

Accessibility:

The City’s fleet of accessible taxis in particular are aging and in need of replacement. The City needs to ensure not only that current subsidies are adequate to support the timely replacement of these extremely expensive vehicles, but also ensure that market conditions are feasible for drivers to continue this critical work. We recommend:

- Fund improved coordination/central dispatching for Wheelchair Accessible Vehicles for Hire, to maximize the utilization of currently available vehicles;
- Review funding levels earmarked for the replacement of aging accessible vehicles to ensure they are adequate and service levels for accessible transportation can be upheld;
- Address by-laws contributing to Vehicle-for-hire driver poverty and precarity to ensure that the industry remains a financially feasible choice for current and prospective drivers.

Enforcement of PTC bylaws

We recommend increasing funding to MLS as necessary so that staff can extend enforcement efforts over hard-to-detect PTC vehicles. Ensuring active PTCs are appropriately labeled and identified for the traveling public is a first necessary step to ensuring these vehicles are being operated in compliance with City bylaws.

Framework development

We recommend funding Transportation Services to provide available raw data on its Open Data portal, as well as regular reports on key industry data (such as the average number of licensed and active taxi and ride-hail drivers, cancellations and new enrollments, driver utilization rates, estimated VKT by ward) to support public participation ahead of the development of the balanced framework for the industry in Q4 2024.

EV subsidies

We note that the City’s success in addressing by-laws contributing to Vehicle-for-hire driver poverty and precarity will be significantly more financially impactful than the contemplated EV subsidies (which may see limited uptake before other known barriers to EV adoption are addressed).

Thank you for your consideration. We are happy to discuss any of these recommendations further.

Sincerely,

Kristine Hubbard, Operations Manager, Beck Taxi
Abdulkadir Mohamoud, CEO & General Manager, Co-op Cabs
Gurjeet Dhillon, Vice President, SCC Group

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