

May 22, 2024

RE: IE 13:1 Micromobility strategy – submission by RideFairTO

Regulating app-based transportation and delivery companies is a crucial part of the micromobility puzzle

RideFair Toronto supports efforts to build a safer, more sustainable and equitable transportation system in our city. We appreciate ongoing efforts to make our roads, sidewalks and bike routes safe, accessible and welcoming for all users, including current work on micromobility captured by Item IE 13.1. However, we would like to point out a significant gap in the proposed regulatory approach to micromobility devices: the material role played by app-based delivery and transportation platforms.

There is no question that the explosion in app-based employment platforms has impacted the growth in use of e-bikes, e-scooters and similar devices in our City. [StatsCan](#) has identified Toronto as the epicentre of Canada's gig economy, home to more than 1 in 5 app-based delivery and transportation workers in Canada. Tens of thousands of workers are buying, leasing or otherwise acquiring micromobility vehicles to work on app-based platforms, impacting our train and subway network, bike paths, roads and sidewalks. Yet for all the impact these platforms have had, our city has neither insight into nor oversight over their operations.

It is equally clear that for workers on most app-based delivery/transportation platforms, working conditions are desperate. A [new study](#) lead by the University of California-Berkeley found that delivery workers' *median* net hourly earnings, before tips, were \$5.93 in that state – and lower in other jurisdictions studied. Many app-based platforms engage in a “[race to the bottom](#),” on the one hand attempting to weaken or avoid employment standards and other regulations; on the other, attempting to download the costs of operation directly onto workers.

The successful avoidance of regulation by major app-based platforms impacts all of us. When app-based delivery and transportation platforms recruit and dispatch workers and vehicles without providing adequate training, safety equipment or insurance, we all pay the price. When delivery workers earn so little they're incentivized to travel at high speeds, cut corners and take risks, we all pay the price.

When the City gives platforms a free ride and instead asks precarious workers to shoulder the responsibilities and costs of regulation, we validate and exacerbate a system that deepens poverty and inequality – and makes our roads less safe, particularly for vulnerable road users.

We urge staff and council to revisit recommendations 9 and 12 to evaluate alternative avenues for regulation that requires platforms to appropriately shoulder costs and address risks related to micromobility vehicles used to provide their services.

RideFair is a not-for-profit supporting equitable and sustainable urban transportation. We believe ride-hailing can work for all of us when governed by fair regulations that protect drivers, customers and the public interest.