

**From:** [David Simor](#)  
**To:** [Mayor Chow](#); [councilmeeting](#)  
**Subject:** [External Sender] Re: IE13.1 - A Micromobility Strategy for Toronto (Ward All)  
**Date:** May 22, 2024 2:28:43 PM

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Dear **Mayor Chow and Members of Council**,

I am the Director of The Centre for Active Transportation (TCAT), a non profit based in Toronto committed to creating more equitable places by working with communities to create safer streets for walking and riding bikes. On behalf of TCAT, I am writing to urge you to protect vulnerable workers who work for food delivery on demand businesses by placing the responsibility for licensing and liability onto the private companies that determine working conditions and wages for their workers. The burden of regulation should not fall on individual food delivery workers, who are predominantly young racialized and newcomer youth.

Beyond the impact of unfair wages, lack of job security, job safety and the economic-well being of gig workers themselves, the payment model used by vehicle-for-hire and delivery by demand companies incentivizes couriers to take dangerous risks - which impacts their own safety and the safety of others. It is our view that the solution to improve the safety of people is not to target vulnerable workers, but work with the app companies that have placed far too many risks, with little reward, on workers.

As such, we urge City Council to request the Ontario Ministry of Finance and the Financial Services Regulatory Authority of Ontario to consult with the insurance industry and other relevant parties on developing mandatory first and third party insurance requirements for delivery and passenger transportation platforms to protect operators using micromobility vehicles that provide services through their platforms.

It is TCAT's position that the app-based companies who are profiting from the use of public roadways must be the ones to take responsibility for their workers' safety and the impacts their companies' practices have on our city.

Thank you for your consideration on this important matter.

Sincerely,

David Simor  
Director  
The Centre for Active Transportation (TCAT)

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