

Amendments to TTC Policy 13.1.2 Advertising on TTC Property

Date: September 10, 2025

To: TTC Board

From: Chief Strategy and Customer Experience Officer

Recommendations

It is recommended that the TTC Board:

Approve the amended Advertising on TTC Property Policy, attached as Appendix B
to this report.

Summary

Offering advertising opportunities on TTC assets provides much-needed revenue to the TTC. In 2024, total advertising revenues were \$31.9 million.

Over the years, the advertising policy has been adjusted to reflect new values of the community and the Board. This update is in response to a Board Motion to review and revise the existing policy. Specifically, staff were requested to review potentially misleading fossil fuel advertising prior to approvals and review its advertising policy with respect to fossil fuel advertisements. In addition, consultation with City staff regarding TransformTO was requested and has occurred.

Staff from Customer Experience and Legal have consulted on the above and are proposing a revised version of the Advertising Policy as set out in Appendix B. In addition, staff have reached out to transit industry peers to consult on their approaches and have considered their work in the proposed amended Advertising Policy as set out in Appendix B.

Following the Board's approval, TTC Policy 13.1.2 will be revised and followed in future reviews of proposed advertisements.

Background and Analysis

On September 24, 2024, the TTC Board requested that staff review potential amendments to the policy on Advertising on TTC Property: (a) requesting that Pattison Outdoor Advertising LP, forward any further fossil fuel advocacy advertising to the TTC for review; (b) ensure that advertiser's claims have been substantiated and are scientifically justified in accordance with Section 74.01 of the Competition Act and Section 8 of the Ad Standards code; and (c) include provisions to decline advertising

that is inconsistent with TransformTO Net Zero commitments.

Notice of Motion – Misleading Fossil Fuel Advertisements on TTC – TTC Board
September 17, 2024 (considered at the September 24, 2024 Board meeting)

This policy update is in response to that motion.

To address fossil fuel advocacy advertising on TTC assets, staff recommend the following amendments to the TTC's Advertising Policy:

- 1. Reinforcing the *Competition Act's* new greenwashing sections that any advertisement that makes a representation to the public about a product's benefit, as an example, for protecting or restoring the environment or mitigating the environmental, social, and ecological causes or effects of climate change, that the representation must be based on adequate and proper testing, the proof of which lies with the Advertiser and the proof must be provided to the TTC prior to approval.
- 2. If the Advertisement makes a representation to the public with respect to the benefits of a business or business activity, as an example for protecting or restoring the environment or mitigating the environmental and ecological causes or effects of climate change, the statement must be based on adequate and proper substantiation in accordance with internationally recognized methodology, and such proof must be provided to the Company prior to the approval of the Advertisement.
- 3. The representations must comply with the Competition Bureau Canada Guidelines on Environmental claims.
- 4. TTC reserves the right to require the Advertiser to indemnify the TTC against any costs or damages arising from the Advertisement being challenged under the *Competition Act*.

Diversity, Equity, and Inclusion Matters

The proposed policy changes do not impact equity/accessibility matters.

Innovation and Sustainability Considerations

Not applicable.

Corporate Plan Alignment

5.2. Address the Structural Fiscal Imbalance: Maximize revenue, protect customer affordability.

Financial Impact

In recent years, the TTC has received minimal revenues relating to fossil fuel advertisements. In 2023, advertising revenue from Pathways Alliance was received in the amount of \$199,000. In 2024, Canada Action purchased a vehicle wrap in the amount of \$22,500. There have been no other fossil fuels-related advertisements on the system since July 2024.

Operating and Capital costs related to managing the Pattison contract and expanding non-fare revenue opportunities are not within the scope of the policy.

The Executive Director – Finance has reviewed this report and agrees with the financial impact information.

Contact

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Attachments

Appendix A – TTC Policy 13.1.2 Advertising on TTC Property (current approved policy) Appendix B – Updated TTC Policy 13.1.2 Advertising on TTC Property (proposed)