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May 19, 2016

Re: IE29.10 - Supporting the Proposed Modernization of Ontario's Framework for Power-Assisted Bicycles (E-Bikes)

Dear members of City Council,

Cycle Toronto supports the Ministry of Transportation's (MTO) proposal ERO 026-0422¹ over e-bikes. We thank Councillor Saxe for requesting the City of Toronto to endorse the proposal, and we ask you to approve the recommendations in item IE29.10.

Currently under the *Highway Traffic Act*, most seated moped/scooter-style e-bikes favoured by many gig workers **do** meet the provincial definition of a legal e-bike. The attempts of the City of Toronto to create order to this chaos, while well intended, has resulted in more confusion while concerns about heavier, faster, and more powerful vehicles remain.

The MTO has proposed a two-class definition for e-bikes or "power-assisted bicycles" that are speed limited to 32 km/h, have a total power of 500 watts or less, must be equipped with working pedals or cranks are capable of propelling the bicycle (although continuous pedalling not required), and allow passengers in a dedicated seat. It would further clarify that other e-moped/scooter-style vehicles must meet an existing motor vehicle class (e.g., limited-speed motorcycle, or motor-assisted bicycle) with licensing and registration. **We believe the new MTO proposal is in the best interest of City Council and everyone on our streets.**

We also support the additional recommendations in item IE29.10:

- MTO reduce the proposed 120 kg max weight for Class 2 throttle e-bikes
- MTO require all e-bikes to meet battery safety standards like UL 2849²
- Toronto update its by-laws to permit "power-assisted bicycles" in bike lanes and disallow motor vehicle classes in bike lanes

Finally, we also urge any updated bike lane by-laws to consider mobility aids like electric wheelchairs and power add-ons as classified by Ontario's Assistive Devices Program.³

Thank you for your attention to this matter.

Michael Longfield
Executive Director

¹ <https://ero.ontario.ca/notice/026-0422>

² <https://www.ul.com/services/e-bike-s-certificationevaluating-and-testing-ul-2849>

³ <https://www.ontario.ca/page/assistive-devices-program>