



**Written Submission to the Standing Committee on Heritage,
Infrastructure, and Cultural Policy**

Toronto Transit Commission (TTC)

May 4, 2026

Public Hearing on Bill 98, *Building Homes and Improving
Transportation Infrastructure Act, 2026*



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Standing Committee on Heritage, Infrastructure, and Cultural Policy
Legislative Assembly of Ontario
111 Wellesley St. W
Toronto, ON M7A 1A2
Canada

Re: TTC Response to Bill 98 Schedule 4 Fare Alignment and Seamless Transit Act, 2026

To: Standing Committee on Heritage, Infrastructure, and Cultural Policy,

As Board Chair and Chief Executive Officer, we are writing on behalf of the Toronto Transit Commission and its Board of Directors to respectfully request *Schedule 4 Fare Alignment and Seamless Transit Act* of Bill 98 is amended to ensure the TTC can continue to make decisions about service and fare policy that is responsive to the needs of Toronto's communities.

We respectfully recommend amendments in **three core areas**:

1. **Limit the scope of regulations** to cross-boundary fare and service policies that improve the regional rider experience without compromising TTC service quality, standards, or affordability for Toronto residents.
2. **Ensure full provincial funding** for any provincial directives implemented under the Act, recognizing that local transit systems already face unsustainable operating and capital funding pressures.
3. **Require meaningful consultation** with local transit systems prior to the introduction of any regulation under the Act.

The TTC is the largest operator of integrated multi-modal public transit services in Canada, with 426 million transit rides forecasted in 2026. Approximately one in five trips made in Toronto is by public transit, underscoring the TTC's essential role in meeting community needs through a transparent and accountable governance model.

The TTC's authority to make decisions about service and fares is fundamental to our ability to deliver transit services that meet the needs of Torontonians and our city's goals for mobility,



affordable housing, congestion, and climate outcomes. Bill 98 proposes giving authority to the Minister of Transportation to introduce directives via regulation that would impact the TTC's authority in these areas. If the intent of the Bill is to enable further fare and service integration, the legislation as written provides much broader potential powers than is required to achieve those outcomes. Instead, the Province should work collaboratively with the TTC and other local transit systems to develop solutions to improve the regional transit rider experience by deepening relationships, and leverage existing agreements as opposed to the use of the enabling legislation that overrides local governance. We are ready to collaborate, in the interests of our customers, to build a better public transit system.

The TTC is a champion of seamless integration of affordable transit services and has been a partner in all prior regional fare and service integration consultations, including the successful design of the One Fare program, participation in PRESTO (as the largest user of the regional fare collection system), and currently operates a cross-boundary Line 1 subway into York Region, and supports service integration in a variety of other ways. The success of these partnerships serves as a model of what is possible when we work together to strengthen public transit in Ontario. With the enactment of the *Fare Alignment and Seamless Transit Act, 2026*, as currently drafted, undermines our shared history of collaboration and mutual agreement to deliver results for transit riders.

As it is currently drafted, Bill 98 has the potential to dilute the ability of the TTC to effectively plan, manage and deliver safe, affordable and reliable services. Further, it does not address the fundamental challenge of Ontario's public transit systems, which requires a new sustainable funding framework for operating and capital needs. We therefore strongly recommend amendments in three core areas.

Recommendation 1: Regulation Scope Limited to Improvement in Cross-Boundary Experience

Schedule 4: Fare Alignment and Seamless Transit Act, 2026, section 7 service integration for priority routes should be amended to be limited to cross-boundary routes only. We recommend the revision of the scope of service and fare policy changes to be strictly limited to address multi-jurisdictional cross-boundary service improvement opportunities. 8 in 10 people who use public transit in Toronto travel locally within the City. The remaining 2 out of 10 people travel regionally and make a cross-boundary trip. The TTC supports initiatives that improve customer's experience of making regional trips as a complement and enhancement to the service quality standards expected of TTC riders who make up 66% of the transit ridership in the Greater Toronto and Hamilton Area.



The proposed legislation should not interfere or constrain local transit systems' abilities to design services that are responsive to local community needs. Fare and service policies introduced to benefit regional riders should not compromise the experience of local transit trips. In addition, the ability for the TTC to introduce fare and service policies that grow transit ridership and improve mobility for our customers must be preserved. For instance, the City of Toronto's recent introduction of a fare capping policy to encourage more people to choose public transit should not be impacted. Clarifying the intention of Bill 98 by restricting the scope of the legislation's applications upholds the TTC Board's endorsed principles outlined in **Attachment 1**.

Recommendation #2: Provincial Funding Support for Provincial Directives

Schedule 4 of the Bill provides no guarantee that the Province will provide new sources of provincial funding to support provincial policy directives adding potential new financial burdens on underfunded local transit systems. Under the Act, if changes were introduced to TTC's fare structure and revenue allocation, it would impact TTC's fare revenue and operating subsidy requirement. If the Province required the TTC to transfer fare revenue to other transit systems that share a designated geographical zone, there is further potential for negative impacts. The TTC's operating and capital budgets would face increased pressures to meet provincial service standards and provide extended service beyond the City of Toronto if provincial funding was not made available for new operating and capital requirements.

Revenue allocation should be decided through agreements with local transit agencies, not at the sole discretion of the Province. There needs to be appropriate accountability, governance and transparency mechanisms for the revenue streams that are essential to the continued successful operation of public transit in Toronto.

The Bill also contemplates the possibility of regulating specialized transit (Wheel-Trans) to provide service beyond current service areas. The TTC acknowledges possible customer benefits, however the high cost of providing the service requires a serious discussion on funding for specialized transit. Extending the service area of Wheel-Trans without adequate provincial funding will lead to deterioration in service.

Clear provisions should be required that provincial funding support will be identified for any provincial directed change in policy. The success of the One Fare Program would not have been possible without the Province of Ontario's full funding of the program. There are many benefits to customers and the region by further enhancing services cross-boundary, but it must be



matched with investment. To ensure continued success in One Fare 2.0, provincial decisions to set fares and/or service must be matched with provincial funding.

Recommendation #3: Meaningful Consultation with Local Transit Systems

Schedule 4: Fare Alignment and Seamless Transit Act, 2026, does not include any requirement beyond the standard 45-day regulatory period for comment. A new provision should be added to ensure meaningful consultation and collaboration with stakeholders before the introduction of a regulatory proposal under the Act. This includes respecting that fare and service policy are fundamental to how transit systems plan, manage and deliver services. Abrupt changes without considering impacts to service, customer experience, operating and capital asset requirement, and the financial and service planning processes of transit systems will create poor outcomes for our customers and negatively impact Toronto's goals on congestion and climate change, improving mobility and building affordable housing.

The positive outcomes of our previous fare and service integration partnerships demonstrate the importance of making decisions that are informed by the needs of local communities, transit employees, and the expertise and planning processes of local transit systems. For these reasons, we recommend provisions for provincial consultation with local transit systems, employees and customers that extends beyond the typical regulatory consultation period. Consideration also needs to be given to collective agreements and engaging with our labour union partners – service directives that impact employee scheduling must respect the TTC's current collective bargaining agreements. Importantly, creating new powers to direct fare and service policy broadly, needs to be matched with appropriate transparency, governance and accountability mechanisms, which may include new forums to ensure responsiveness to the communities impacted by policy decisions.

As approximately two-thirds of all current transit trips in the GTHA are made on the TTC, the TTC must be included in direct and meaningful consultations as a true partner and active participant in constructive dialogues concerning the application of this legislation.

Conclusion

To ensure that Bill 98 facilitates collaboration between the Ontario Government and local transit agencies to deliver more seamless and integrated transit, we strongly and respectfully request that it be amended to include limitations of scope, provincial funding support, and extended consultations with local transit systems.



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We appreciate the provincial government's efforts to strengthen public transit as a key driver of economic growth and tackling congestion in the region. The experience of all transit riders, whether they make a local trip or a regional trip should be at the centre of these discussions. Continuing our relationship of collaboration, we look forward to working together to make transit more seamless and easier to use for residents who rely on our network every day.

Thank you for considering our submission.

Regards,

Jamaal Myers
Board Chair, Toronto Transit Commission

Mandeep S. Lali
CEO, Toronto Transit Commission

Cc: The Honourable Rob Flack, Minister of Municipal Affairs and Housing
The Honourable Prabmeet Singh Sarkaria, Minister of Transportation
Her Worship Olivia Chow, Mayor of Toronto
Toronto Transit Commission Board of Directors

Attachment:

1. TTC Board Motion: Responding to Bill 98, Building Homes and Improving Transportation Infrastructure Act, 2026



Motion without Notice

Responding to Bill 98, Building Homes and Improving Transportation Infrastructure Act, 2026

Moved by: Chair Jamaal Myers

Seconded by: Commissioner Alejandra Bravo

Urgency Statement

On March 30, 2026, Ontario's Minister of Municipal Affairs and Housing introduced Bill 98, *Building Homes and Improving Transportation Infrastructure Act, 2026* and on April 1, 2026, the legislation was debated in Second Reading.

Schedule 4 of Bill 98 will enact the *Fare Alignment and Seamless Transit Act, 2026*, which enables the Minister of Transportation to exercise sweeping powers over service and fare policies to further integrate transit in the region. Consultation may commence as early as May 2026 on proposals under this new legislation.

Recommendation

It is recommended that the TTC Board:

1. Endorse the following key principles to guide TTC staff participation in consultations with the Province of Ontario on the province's regulatory framework under the Fare Alignment and Seamless Transit Act, 2026:
 - a. **Local authority to develop local solutions to transportation needs** – Preserve the autonomy of local transit systems to introduce fare and service policies that meet the needs of local communities and riders, keep transit affordable, and treat all Toronto residents equitably as a key component of the City's approach to local transportation and congestion management.
 - b. **Protect local transit service quality** – Preserve service quality and standards relied upon by our customers – proposals must not negatively impact the experience of most customers who travel within the City of Toronto in efforts to improve cross-boundary travel for the 18% who currently make a connecting trip to GO or a 905-transit system.
 - c. **No unfunded provincial mandates** – Provincial decisions to set fares and/or service be matched with full funding (operating and capital) by the Province of Ontario.
 - d. **Value for money** – where provincial directives require the use of specific fare payment systems, unified booking systems, or other changes that have a financial impact to the TTC, there must be clear demonstration that the systems

offer value for money, respect Toronto taxpayers, and are efficiently and effectively delivered.

- e. **Respect local transit system expertise and planning process** – Consultation that respects the expertise and planning processes of local transit systems, customers and its employees, during both the development of the regulatory framework and when decisions are made using the regulations enacted under the Act.
 - f. **Good governance** – ensure opportunities for local transit systems, communities, and labour partners to have voice in decision making supported by a sustainable provincial funding model for public transit.
2. Request the Ontario Minister of Transportation provide an opportunity for public feedback on any regulatory framework or regulations proposed under Bill 98, Schedule 4, the Fare Alignment and Seamless Transit Act, 2026.
 3. Request TTC staff to support public advocacy efforts by transit riders and other stakeholders to advance the principles outlined in Recommendation 1.

Summary

The TTC's mission is to "serve the needs of transit riders by providing a safe, reliable, efficient and accessible mass public transit service through a seamless integrated network to create access to opportunity for everyone." The TTC's role providing transit that keeps Toronto moving is integral to our city's economy and the lives of people who rely on the TTC to get around.

The ability for the TTC to make decisions about service and fares are fundamental to our ability to deliver transit services that meet the needs of Torontonians and our city's goals for transportation, congestion, and climate outcomes. These decisions are made by the TTC's Board through the Annual Network Plan, Operating & Capital Budgets, and other plans and strategies, which are informed by community input and considered at public meetings. *Bill 98, Building Homes and Improving Transportation Infrastructure Act, 2026* proposes substantial power to the Minister of Transportation to introduce directives via regulation that would impact the TTC's authority in these areas.

As a partner in the One Fare program and operator of cross-boundary service on Line 1 into York Region, the TTC has worked to contribute to a regional transportation network that serves people from across Ontario. These partnerships have been the result of collaboration across agencies and levels of government, and serve as a reminder of how we can work together to continue advancing stronger public transit in Ontario, together. If Bill 98 is adopted, regulations made under the *Fare Alignment and Seamless Transit Act, 2026* (Schedule 4 of Bill 98) should be informed by the needs of local communities and continue that history of collaboration and mutual agreement.

As more information is made available on the proposed application of the legislation through discussions with the Province of Ontario, the TTC should be guided by the following key principles outlined in recommendation 1. In addition, the Ministry should ensure that all regulations are open to public feedback.

Date: April 15, 2026