

Feasibility of Requiring Side Guards on Contractor Commercial Vehicles Operating in the City of Toronto

Date: April 22, 2026

To: Infrastructure and Environment Committee

From: General Manager, Fleet Services Division

Wards: All

SUMMARY

This report responds to the City Council direction ([2024.IE18.5](#)) to assess the feasibility of requiring existing and new Suppliers who use commercial vehicles to provide contracted City services to have side guards installed on their vehicles. Commercial vehicles are heavy-duty fleet assets weighing 4,500 kgs (10,000 lbs) or more and pose the greatest risk to pedestrians and cyclists (known collectively as Vulnerable Road Users (VRUs)) due to their size and weight. Side guards are protective railings or bars mounted on the sides of large trucks between the axles to prevent VRUs from being pulled under a truck's wheels in the event of a collision.

The City of Toronto interacts with three types of fleets, all of which may include commercial vehicles:

- **City-Owned Fleet:** Vehicles owned and operated by the City of Toronto. As directed by Council, through [2024.IE18.5](#), the City is installing side guards on all City-owned commercial vehicles by the end of 2026 and has done so at a pace that is ahead of schedule.
- **Contracted Dedicated Fleet:** Vehicles owned and operated by a supplier but allocated on a full-time basis solely for City work. This includes commercial vehicles with City branding (e.g., City of Toronto decal). It is appropriate and feasible to require side guards on this fleet.
- **Contracted Non-Dedicated Fleet:** Vehicles owned and operated by a supplier but servicing multiple clients; not exclusive to the City of Toronto. It is not feasible to require side guards on this fleet.

Staff assessed potential impacts to service delivery and determined that it is feasible and appropriate to require side guards on commercial vehicles in the contracted dedicated fleet as of May 2027, with exemptions provided for extenuating circumstances. This requirement is expected to impact approximately 1,200 commercial

vehicles, with applications ranging from winter maintenance and snow clearing to road repair, high-impact public works, and urban forestry. An effective date of May 2027 provides sufficient time to update procurement templates and enables both City Divisions and Suppliers to plan and comply with this requirement.

Staff assessed that it is not feasible to require side guards on commercial vehicles in the contracted non-dedicated fleet, as there is a high risk of disruption to routine services that the City receives or procures. The City has limited ability to govern and enforce requirements for the City's contracted non-dedicated fleet; this includes services, including parcel and courier trucks, towing service trucks, construction haulage trucks, and aggregate trucks.

To develop this approach, the Fleet Services Division (FSD) conducted a jurisdictional scan of comparable municipalities and engaged with 19 City Divisions through the distribution of a survey and through focused discussions. Through this engagement, the approach was refined to focus on commercial vehicles in the contracted dedicated fleet, as this could be implemented without significant impacts to service delivery and without significant cost implications.

FSD also engaged with Suppliers through an external market survey distributed to both large and small Suppliers and diverse and social procurement vendors. Feedback was overall positive, and Suppliers indicated that the requirement is feasible (e.g., parts are available and manufacturers offer installation services).

Requiring side guards on commercial vehicles in the contracted dedicated fleet aligns with the City's commitment to the Vision Zero Road Safety Plan and its commitment to protecting VRUs. Embedding this requirement as a standard contractual condition ensures consistency, clarity, and enforceability across all applicable service areas and ensures that all commercial vehicles operating under the City's authority or representing the City in the public realm meet a consistent, enforceable safety standard.

RECOMMENDATIONS

The General Manager, Fleet Services Division, recommends that:

1. City Council direct all Division Heads to incorporate side guards as a contractual requirement for commercial vehicles which are dedicated to providing goods and services to, or on behalf of, the City of Toronto, for all new contracts awarded starting May 2027.
2. City Council authorize the applicable Division Head and the General Manager, Fleet Services, to jointly approve case-by-case exemptions, in the event of extenuating circumstances, to the side guard requirement noted in Recommendation 1.

FINANCIAL IMPACT

Should the City Council adopt the proposed recommendation, future procurements may experience incremental cost pressures to account for retrofit, installation, and maintenance costs. These costs may be transferred to the City; however, costs are not expected to be significant relative to the value of the asset and the value of impacted contracts. It is estimated that approximately 1,200 commercial vehicles in the contracted dedicated fleet may be impacted by this requirement.

Adopting this requirement may also result in additional contract administration requirements. Divisions are expected to manage minor administrative impacts within existing resources, with any material financial pressures to be identified through future budget submissions.

The Chief Financial Officer and Treasurer have reviewed this report and agree with the information included in the Financial Impact section.

DECISION HISTORY

On December 17 and 18, 2024, the City Council adopted item [IE18.5](#), directing Fleet Services Division to proceed with retrofitting suitable City-owned commercial vehicles with side guards, and, in consultation with relevant City Divisions, to report back on the feasibility of requiring Suppliers providing City-contracted services to install side guards on commercial vehicles.

<https://secure.toronto.ca/council/agenda-item.do?item=2024.IE18.5>

On December 17 and 18, 2024, the City Council adopted item [IE18.1](#), directing the General Manager, Transportation Services, City Solicitor, and Members of Council to implement a series of measures to enhance road safety under the Vision Zero Road Safety Plan.

<https://secure.toronto.ca/council/agenda-item.do?item=2024.IE18.1>

On September 18, 2024, the Bid Award Panel adopted item [BA97.3](#), directing Fleet Services Division to proceed with a contract award to AirFlow Deflector Inc. for the supply and installation of pedestrian and cyclist safety side guards on existing City of Toronto Class 4–8 vehicles and refuse trailers.

<https://secure.toronto.ca/council/agenda-item.do?item=2024.BA97.3>

On November 8 and 9, 2023, the City Council adopted item [IE7.9](#), directing the City Manager to formally request that the federal government develop and implement enhanced safety standards and regulations for heavy trucks, including the mandatory use of new and emerging safety technologies such as sensors.

<https://secure.toronto.ca/council/agenda-item.do?item=2023.IE7.9>

On November 8, 2023, the City Council adopted item [IE7.4](#), updates to the Vision Zero Road Safety program, including a revised traffic calming policy, updated criteria for

Community Safety Zones, enhancements to zebra crossing marking standards, and an expanded approach to area-based speed limit reductions.

<https://secure.toronto.ca/council/agenda-item.do?item=2023.IE7.4>

On February 2, 2022, the City Council adopted item [IE27.8](#), updates to the Vision Zero Speed Management Strategy, directing Transportation Services to advance a range of speed management initiatives aimed at improving road safety.

<https://secure.toronto.ca/council/agenda-item.do?item=2022.IE27.8>

On July 16, 17, and 18, 2019, the City Council adopted item [IE6.8](#), Vision Zero 2.0, directing Transportation Services to advance an updated Road Safety Plan focused on reducing traffic-related fatalities and serious injuries.

<https://secure.toronto.ca/council/agenda-item.do?item=2019.IE6.8>

On October 2 and 3, 2019, the City Council adopted item [MM10.14](#), a Member Motion directing Transportation Services to strengthen the focus on heavy trucks within the Vision Zero Road Safety Plan.

<https://secure.toronto.ca/council/agenda-item.do?item=2019.MM10.14>

On July 12, 13, 14, and 15, 2016, the City Council adopted item [PW14.1](#), the Road Safety Plan 2017–2021, directing Transportation Services to implement a comprehensive, data-driven approach to road safety.

<https://secure.toronto.ca/council/agenda-item.do?item=2016.PW14.1>

COMMENTS

Feasibility Analysis

The City interacts with three types of fleets, all of which may include commercial vehicles. This includes the City-owned fleet (vehicles owned and operated by the City), the contracted dedicated fleet (vehicles owned and operated by a supplier but allocated on a full-time basis solely for City work), and the contracted non-dedicated fleet (vehicles owned and operated by a supplier but servicing multiple clients; not exclusive to the City of Toronto).

To determine the feasibility of requiring side guards on the contracted dedicated fleet and the contracted non-dedicated fleet, FSD engaged with City Divisions, distributed an external market survey to Suppliers, and conducted a jurisdictional scan to understand if any other jurisdictions have required side guards on commercial vehicles as part of their contracted fleet, and if so, how this requirement has been implemented.

Engagement with City Divisions

Several Divisions across the City use contractors for their daily operations and service delivery. FSD consulted with all City of Toronto Divisions to understand and further assess the potential impacts of requiring side guards on commercial vehicles in the

City's contracted dedicated and contracted non-dedicated fleet on a go-forward basis. A survey was distributed to all 45 Divisions; 19 Divisions provided feedback.

While several divisions supported the intent of the requirement and its alignment with the City's Vision Zero Road Safety Plan, several operational concerns were identified. These include challenges related to service delivery, potential cost increases, potential impacts to bidder participation, and compliance, particularly for commercial vehicles in the City's non-dedicated fleet, where it may be difficult to determine which vehicles are assigned specifically for City services. This feedback supported FSD in scoping the proposed recommendation and evaluating implementation to address concerns identified by City Divisions.

External Market Survey

To understand the impact of requiring side guards on commercial vehicles in the City's contracted dedicated and contracted non-dedicated fleets, FSD conducted an external market survey, including large firms, small businesses, and diverse and social procurement vendors. The objective was to assess industry readiness, potential financial and supply chain impacts, and to understand potential costs associated with retrofitting commercial vehicles to install side guards.

Of the responses received, 19% were from the waste collection or utilities sector, 14% from delivery or transport, 1% from construction or infrastructure, and the remaining 66% from other industries, such as electrical and mechanical contracting. Feedback was overall positive, and Suppliers indicated that the requirement is feasible, but may result in some cost increases. The Supplier community appears capable of compliance with the proposed recommendation, and there was broad agreement that side guards improve road safety.

Although there is currently no requirement for side guards on commercial vehicles in the City's contracted dedicated fleet and contracted non-dedicated fleet, several industry leaders in the construction and waste management industries have voluntarily installed side guards on their commercial vehicles. This proactive approach reflects a commitment to improving public safety and growing recognition within the industry that side guards are an important safety feature that can help reduce the risk of serious injuries. This is particularly important in urban environments where construction, waste collection, and other large commercial vehicles operate in proximity to VRUs.

Jurisdictional Scan

Several North American jurisdictions have set out requirements to install side guards through procurement policies and fleet safety programs. Cities such as New York City and Chicago require side guards on commercial vehicles in both city-owned and contracted fleets.

In Canada, there are currently no federal or provincial requirements mandating the installation of side guards on commercial vehicles. Municipalities including Vancouver, Montreal, Halifax, Victoria, and St. John's have required side guards on commercial

vehicles in their city-owned fleets, reflecting growing alignment with best practices in urban safety.

Cities that have successfully implemented side guards on commercial vehicles in their contracted fleets demonstrate that effective and scalable implementation is achievable when supported by a structured and coordinated approach. These jurisdictions have set out programs, recognized by the U.S. Department of Transportation and other road safety organizations as best practices in advancing urban road safety, and have typically been underpinned by several common elements, including a forward-looking approach focused on new procurements rather than retroactive fleet-wide requirements; strong cross-divisional coordination among fleet, procurement, legal, and safety functions; supplier education and outreach to support industry readiness; adoption of recognized technical standards, such as the LPD Best Practice Specification; development of procurement policies, procedures, and, where applicable, enabling by-laws or local legislation; and clear installation guidelines with defined compliance and enforcement mechanisms.

The United States Department of Transportation has developed the LPD Best Practice Specification (DOT-VNTSC-OSTR-16-05), which is widely recognized as a leading standard for side guard implementation. The LPD standard establishes clear performance criteria, including requirements for ground clearance, lateral coverage, and structural strength, and is considered a benchmark for improving safety outcomes for VRUs.

Proposed Recommendations

Based on the findings from the engagement with City Divisions and external Suppliers, and the jurisdictional scan, this report recommends requiring side guards be installed on commercial vehicles in the City's contracted dedicated fleet. This is feasible and appropriate, as this requirement can be implemented without significant impacts to service delivery and significant cost implications. Additionally, this requirement would ensure that all commercial vehicles operating under the City's authority or representing the City in the public realm meet a consistent and enforceable safety standard.

Based on current operations, this requirement is estimated to impact approximately 1,200 commercial vehicles. The City has entered into several contracts where commercial vehicles are used as part of the contracted dedicated fleet, including approximately 1,000 vehicles under Transportation Services contracts, 104 vehicles under Solid Waste Management contracts, 90 vehicles under Urban Forestry (arboricultural) service contracts, and 65 under Toronto Water contracts. These contracts are for the delivery of key services, such as winter maintenance and snow clearing, transportation and road work projects, and high-impact public works and environmental programs.

The proposed recommendation allows for exemptions, which may be authorized by the applicable Division Head signing the contract, jointly with the General Manager, Fleet Services, for such things as work related to emergency response/rapid response, or if

operational, safety, technical or legal conditions prevent the use of side guards (e.g., manufacturer-imposed limitations).

Implementation

The City is taking the following implementation approach, in alignment with best practices gleaned from other comparable jurisdictions to support compliance by City Divisions and Suppliers:

- Focusing on future contracts: Applying this requirement to new contracts awarded starting May 2027 allows Suppliers and Divisions to plan side guards for the dedicated contracted fleet.
- Supporting Market Competitiveness: The City recommends establishing defined implementation periods to install side guards post contract award to support Supplier compliance and mitigate potential impacts to bidder participation.
- Standardization: The City will require adoption of the Volpe LPD Best Practice Specification to alignment with best practices and consistency in technical requirements.
- Centralized Guidance: FSD will help Divisions ensure consistent application, reducing variability and administrative burden across divisions.

This approach builds on the City's established leadership in fleet safety, including focused efforts to retrofit commercial vehicles in the City-owned fleet by the end of 2026, and the integration of advanced safety technologies, such as 360-degree camera systems and collision mitigation technologies, across the City owned fleet.

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SIGNATURE

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