

Review of the City Authority to Address Traffic and Privacy Issues Regarding Automated Vehicles on City of Toronto's Streets

Date: May 28, 2026

To: Infrastructure and Environment Committee

From: General Manager, Transportation Services

Wards: All

SUMMARY

This report responds to a request from the Infrastructure and Environment Committee to report to its meeting on June 10, 2026 regarding the authority the City of Toronto can exercise to address traffic and privacy issues that may arise in connection with automated vehicles (AVs) on City streets or sidewalks.

The Ministry of Transportation (MTO) has the authority to license AV operations and decide whether a specific operator's vehicles can be deployed in Ontario, as well as where and under what conditions they may operate.

AVs are subject to the same laws as all other vehicles under the Criminal Code, Ontario's Highway Traffic Act (HTA) and the Toronto Municipal Code (TMC). However, many traffic and parking regulations are drafted contemplating a human driver, meaning that tickets must be issued to a human driver. Owner liability, meaning a ticket issued to the vehicle owner instead of the human driver, is already contemplated in many of the City's Municipal Code Chapters that include non-moving violations (parking, stopping and standing). Many moving violations under the HTA and Criminal Code do not contemplate driverless vehicles in this manner.

With respect to privacy, the federal Personal Information Protection and Electronic Documents Act (PIPEDA) governs personal information collected by AVs for the purpose of mapping, training or other purposes in the course of operations. The collection and use of data (including personal information) associated with automated vehicle operations is governed through federal and provincial legislative frameworks, which the City does not have legislative authority to override.

This report has been developed in consultation with the Executive Director, Municipal Licensing and Standards, and the City Solicitor.

RECOMMENDATIONS

The General Manager, Transportation Services recommends that:

1. The Infrastructure and Environment Committee receive this report for information.

FINANCIAL IMPACT

There is no financial impact resulting from the adoption of this report. The Chief Financial Officer and Treasurer has reviewed this report and agrees with the financial impact information.

DECISION HISTORY

At its meeting on February 25, 2026, the Infrastructure and Environment Committee requested the General Manager, Transportation Services, in consultation with the Executive Director, Municipal Licensing and Standards, and the City Solicitor, to report to the June 10, 2026 meeting of the Infrastructure and Environment Committee regarding what authority the City of Toronto can exercise, if any, to address traffic and privacy issues that may arise in connection with automated vehicles on City of Toronto streets or sidewalks ([Agenda Item History - 2026.IE27.2](#)).

At its meeting on June 26, 2025, City Council directed staff to write to the province, the Office of the Privacy Commissioner of Canada and the Information and Privacy Commissioner of Ontario regarding the Automated Vehicle Pilot operated by Magna City Delivery under licence from the Ministry of Transportation of Ontario (Agenda Item - 2025.IE22.1). Automated Vehicle Program Update Page 1 of 3 Council also asked what ability the City has to govern the collection and use of data collected by the Magna Automated Vehicle Pilot. ([Agenda Item - 2025.IE22.1](#))

COMMENTS

City of Toronto Authorities over Automated Vehicles

While the Ministry of Transportation (MTO) maintains primary authority over the approval and operation of automated vehicles in Ontario, the City retains a number of existing municipal authorities and operational tools that apply to AVs in the same manner as other vehicles. These include authority over traffic and parking regulations on municipal roads, land use planning and zoning, vehicle-for-hire regulations, curbside management, and operational coordination related to road safety and work zones.

1) Authorities over all vehicles

The City's authority to regulate traffic and parking on municipal roadways is established through the broad scope of powers conveyed by the City of Toronto Act, 2006, and exercised through applicable municipal by-laws. Automated vehicles operating on City

streets are subject to the same provincial and municipal laws that apply to all vehicles, including the Highway Traffic Act, Criminal Code, and relevant provisions of the Toronto Municipal Code.

Certain existing legislative and enforcement frameworks were developed on the assumption that a human driver is physically operating the vehicle at the time of an offence. As automated vehicle technology evolves, some enforcement provisions may require clarification or modernization at both the provincial and municipal level, particularly in circumstances involving fully autonomous or driverless operations, to enable owner liability (i.e. ticketing or charging of the vehicle owner rather than a human driver).

The City currently administers a range of parking, stopping, standing, and camera-based enforcement measures through existing municipal and provincial frameworks, including the Administrative Penalty System where applicable. Owner-liability provisions already exist for many non-moving violations and for the red-light camera automated enforcement program.

Moving violations, including speeding and failing to yield offences, are primarily governed through provincial legislation. Any broader legislative changes respecting enforcement authorities, liability frameworks, or the regulation of fully automated vehicle operations would require provincial consideration.

Transportation Services and Toronto Police Service continue to monitor developments related to AV enforcement and operational impacts within the context of existing legislative authorities.

2) Authority over location of vehicle-related facilities

The City's Zoning framework regulates land use permissions associated with vehicle related activities, including vehicle storage, servicing, maintenance, and related operational functions. Relevant planning and zoning tools continue to apply irrespective of automated driving technology.

Fleet-based activities, including the congregation of AVs accessing or departing from storage and servicing facilities, may also generate traffic and land use impacts.

The City-wide Zoning By-law 569-2013 regulates all land uses, buildings, and structures and applies to most lands in the City of Toronto. For lands not covered by the City-wide Zoning By-law, the comprehensive zoning by-laws of the former municipalities remain in effect.

While the Zoning by-law does not regulate vehicles, it includes regulations governing the location, size, and scale of vehicle-related facilities, including vehicle storage and maintenance uses. Although these by-laws do not regulate vehicle operations or traffic behaviour on a vehicle-by-vehicle basis, they provide mechanisms to manage the scale, concentration, and location of fleet-based activities. The zoning framework is one tool available to manage or support the mitigation of associated land use impacts, including traffic generation for both passenger and goods movement, lighting, and land use

conflicts that may arise from facilities used for storage, maintenance and/or charging of large fleets of vehicles.

The City-wide Zoning By-law only permits the non-public vehicle storage and vehicle repair and servicing uses within the interior of employment areas and specifically within Employment Industrial (E) and the Employment Heavy Industrial (EH) zone.

3) Authority over Privacy and Data Management

City Council, at its meeting on June 24, 2025, directed staff to seek advice from the Office of the Privacy Commissioner of Canada and the Information and Privacy Commissioner of Ontario on the privacy risks of AVs. The City of Toronto received responses from the Office of the Privacy Commissioner of Canada and the Information and Privacy Commissioner of Ontario and submitted them as attachments to [IE27.2 - Correspondence Update on the Automated Vehicle Pilot Program](#). There was no action for the City from this correspondence.

The City's Digital Infrastructure Strategic Framework promotes digital autonomy and public interest in the stewardship of City data for City-run initiatives taking place in Toronto. The City does not have legislative authority to override the federal Personal Information Protection and Electronic Documents Act (PIPEDA), nor provincial laws governing the collection and use of data or personal information in programs run by the province or private companies.

4) Vehicle-for-Hire Regulations

Chapter 546 of the Toronto Municipal Code establishes a regulatory framework for the licensing and oversight of vehicles-for-hire (VFH) operating within the City of Toronto, including taxicabs, limousines, and private transportation companies (PTCs) such as Uber and Lyft.

Should a company propose providing rideshare services in driverless vehicles, staff would support regulating this activity to uphold public safety, consumer protection, and service quality. This could include a review of bylaw definitions to ensure existing standards continue to apply regardless of how the vehicle is driven, and/or creating additional rules specific to AVs. The intent of any bylaw changes would be to create certainty around how rules regarding vehicle safety and inspection, insurance, fare disclosure, and recordkeeping and reporting would apply industry wide.

MLS staff, in consultation with Legal Services and Transportation Services, are reviewing how Chapter 546 would currently apply to AVs, and what changes may be required in future. Staff will continue to monitor the AV landscape as it relates to VFH, including reviewing available information on potential operating models of AV companies, and will bring forward any necessary changes at the appropriate time to City Council to ensure that Chapter 546 continues to perform its intended functions regarding consumer protection and community safety.

City of Toronto Influence over Automated Vehicles

The Automated Vehicle pilot is governed by Ontario Regulation 306/15 under the Highway Traffic Act. O.Reg 306/15 does not allow municipalities to decline or opt-out of the AV pilot program or of any specific deployments of automated vehicles in their jurisdiction.

Under the current provincial AV Pilot Program framework, the City can take some steps to influence the operations of automated vehicles and provide input respecting local transportation, safety, and work zone considerations. These include:

- engaging directly with companies that have applied to the AV Pilot Program, to learn about their intentions, the capabilities of their vehicles, their privacy and information security protections, and to build a collaborative relationship;
- submitting comments to the Ministry of Transportation during the time it is considering an application from an AV company, with recommendations for conditions to be placed on the AV's operations in Toronto; and
- providing guidelines for what to include in a Work Zone & Law Enforcement Interaction Plan, a document that AV companies are expected to provide to the municipality in which they will operate; engaging collaboratively with the companies to refine these plans in a manner that reflects unique local circumstances for a particular AV's operations.

TPS has identified opportunities for continued coordination with Transportation Services and the Ministry of Transportation, including awareness, training, and information sharing initiatives with each AV operator.

These opportunities to influence AV operations are dependent on the willingness of the AV company to engage with and provide fulsome responses to the City's questions, to collaborate in good faith with work zone and law enforcement personnel to reduce or eliminate negative impacts on the City's transportation network, and on the extent to which MTO incorporates the City's perspectives into licensing and the level of collaboration they require the AV companies to engage in.

Conclusion

Automated vehicles operating in Toronto are currently governed through existing federal, provincial and municipal legislative frameworks with the MTO maintaining primary authority over the approval and operation of automated vehicles programs in Ontario.

The City's authority over automated vehicles is limited. The provincial framework under O. Reg. 306/15 does not require or allow municipalities to approve or decline AV deployments, and the City cannot create a licensing regime that conflicts with the provincial program. Similarly, the City does not have legislative authority to override provincial or federal laws governing how private companies collect and use data, nor provisions in the provincial Highway Traffic Act or the Provincial Offences Act that limit the ability to enforce against driverless vehicles.

Similarly, the City does not have legislative authority to override provincial or federal laws governing how private companies collect and use data, nor over enforcement authorities, liability frameworks or regulation of automated vehicle operations which are within provincial or federal jurisdiction.

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SIGNATURE

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