

Vehicle-for-Hire Public and Stakeholder Consultation

In-Person Public Town Hall Meeting:

June 24, 2024

Staff Attendance

Municipal Licensing and Standards, City of Toronto:

- Josh Cho, Policy Development Officer
- Tobiah Abramson, Policy and Planning Advisor
- Marcia Stoltz, Manager, Vehicle-for-Hire & Road Allowance
- Joanna Hazelden, Director, Policy and Strategic Support (Acting)
- Fiona Chapman, Director, Business Licensing and Regulatory Services
- Thurka Sinnathamby, Stakeholder Engagement Lead, Policy and Strategic Support

Gladki Planning Associates Inc.

- Lindsay Toth, Principal Planner and Engagement Specialist
- Natalie Barcellos, Planner and Engagement Specialist
- Weston Smith, Planning Intern

Background

The City of Toronto is holding public and industry stakeholder consultations as part of an ongoing review of the vehicle-for-hire framework and by-law, in response to multiple directives from City Council. Gladki Planning Associates Inc. (GPA) has been retained by the City of Toronto to facilitate a series of public and stakeholder engagement meetings that will inform a staff report from the Municipal Licensing and Standards (MLS) division on vehicle-for-hire services within the City of Toronto.

Vehicle-for-hire (VFH) services, which includes taxicabs, limousines and private transportation companies (PTC), are regulated by Chapter 546 of the Toronto Municipal Code. The by-law establishes regulations for:

- Licensing and regulatory requirements;
- Limits on the number of taxicabs;
- Fares for taxicabs;
- Eligibility criteria for the City's Accessibility Fund Program; and
- Vehicle safety and service standards.

The intent of the by-law is to provide public safety and consumer protection. The vehicle-for-hire industry has undergone a series of changes since 2016, when the current by-law was introduced, in order to regulate PTCs. The evolving social, political, and economic context, as well as direction from City Council has prompted the City to consider updates and additions to the by-law to ensure that the regulations remain responsive to the overall intent of the by-law.

Public and stakeholder consultation programmes were executed in both 2019 and 2023 to solicit feedback on public safety, driver and vehicle requirements, limousine regulations, cost of delivering accessible vehicle-for-hire service, and net-zero vehicle-for-hire initiatives, respectively. The feedback from these rounds of consultations informed the vehicle-for-hire licensing by-law updates in 2019 and the 2023 zero-emissions vehicle-for-hire policy.

This current phase of public consultation seeks to build upon the previous amendments to the vehicle-for-hire by-law and rounds of consultation.

Meeting Overview

On June 24, 2024, the City of Toronto's Municipal Licensing and Standards division hosted an in-person town hall meeting at East York Civic Centre to present and receive feedback on emerging policy directions for the by-law amendment. Approximately **34** people attended the event, primarily from the taxicab industry.

Gladki Planning Associates (GPA) convened the meeting and provided an overview of the meeting agenda and described their role as a third-party, independent facilitator. City of Toronto Staff delivered a presentation that included:

- an overview of the context and purpose for consultation;
- potential regulation and programmatic updates to improve wheelchair accessible service;
- potential options for a licensing limit; and
- the City's approach to studying and reporting on the mayoral directive to explore driver wages in Toronto.

Following the City's presentation there was a discussion period where attendees were invited to share feedback verbally at the front of the room using a microphone. Feedback Forms were available for those that preferred to share their ideas in writing or who did not have a chance to speak due to time constraints. Both the verbal and written feedback has been organized in a thematic summary in the following section. A complete record of *all* of the feedback received has been included in *Appendix A*. *Appendix B* includes a list of all organizations with a representative in attendance. This list only includes representative that identified themselves during the meeting.

The feedback captured in this report is a record of what was shared by meeting participants. The feedback does not represent the opinions of GPA.

Meeting Promotion

City of Toronto staff were responsible for promoting consultation activities. The consultation was advertised widely. Promotional content and communication materials were shared using a variety of communication channels including:

- A dedicated webpage;
- Social Media Advertisements;
- Advertisements on navigation and gas applications (e.g. Google Maps, Waze, Petro Canada, etc.);
- Advertisements on Taxi News;

- BusinessTO June 11th Newsletter;
- Monthly Newsletter to Councillors; and
- Vehicle-for-Hire By-law public mailing list.

The City also conducted targeted outreach with stakeholder groups, described below.

- **Taxicab Industry.** Details about the consultation meetings and the online survey were sent via email to over 6,000 drivers/owners/operators and 25 brokerages.
- **Accessibility Organizations & Community.** Details about the consultation meetings and online survey were sent via email to over 160 recipients, Mailers were sent to over 700 recipients. Information about the consultation meetings were also shared with the City of Toronto's Accessibility Unit in the People & Equity division.
- **Private Transportation Companies (PTCs).** Details about the consultation meetings and online survey were sent by email to over 70,000 currently licensed PTC drivers.

Thematic Summary

This section organizes and summarizes all of the feedback received according to four main topic areas. These are:

- Licensing Limit
- Driver Wages
- Accessibility
- Miscellaneous

38 pieces of feedback were received. Participants were invited to share a comment or a question verbally at the front of the room or write their comment or question on a feedback form. All **38** pieces of feedback are considered as part of the public record and have been organized, analysed, and summarized in the summary.

The thematic summary is not intended to be a verbatim account of what was said during the meeting. The summary provides an overview of the main themes and key pieces of feedback received by attendees during the meeting. *Appendix A* includes a complete record of comments/questions.

Licensing Limit

Meeting attendees made **13** comments regarding licensing limits. The following points summarize the key feedback attendees shared.

Imposing a licensing limit on the number of PTCs could benefit both the taxicab industry and Toronto as a whole. There was consensus among participants that a licensing limit would benefit the taxicab industry because it would create more fair competition between the PTC and taxicab industry, ensuring more financial stability in the VFH market. Multiple participants argued that a licensing limit should correspond more closely with the demand for VFH services within the city. Additionally, many attendees remarked on the potential benefits that a licensing limit could have in Toronto more broadly. Benefits that were identified by participants included reducing traffic congestion and pollution. One participant argued that a limit would benefit local businesses because gridlock, worsened by high volume of PTC vehicles on the road, negatively impacts commercial deliveries.

Introducing a licensing limit is a way the City could take a proactive role in regulating PTCs. Participants consistently expressed that the regulations (i.e. how many licences are permitted, drivers can be full time or part time, etc.) for PTCs are too relaxed, particularly in comparison to the regulations for taxicabs. Multiple attendees suggested that a licensing limit is one way that the City could strengthen the regulatory framework for PTCs, and in turn create more fairness between the two industries. One participant shared that they had gone through the process of obtaining a taxicab licence and a PTC licence. They opined that that it was far easier to obtain the PTC licence. Additionally, some participants shared concerns about PTC business practices. Specifically, people were concerned that PTCs are oversupplying the market with drivers and only paying drivers for P3 time (time the driver has a passenger in the car). Participants asked that the City take a more active role in ensuring that PTC drivers are being treated fairly by corporations.

The City should consider distributing PTC licences to drivers directly instead of letting companies distribute them. Some participants argued that allowing PTCs to distribute the licences to their platforms (as is done under the current licensing framework) gives PTCs too much power. These participants suggested that the City should create a universal PTC licence that would allow a PTC driver to drive on all PTC platforms in the city. They argued that a licensing framework where the City directly distributes PTC licences would allow for more oversight of the PTC industry, contributing to fairer outcomes for drivers.

Driver Wages

Meeting attendees made **6** comments regarding driver wages. The following points summarize the key feedback attendees shared.

Wages are so low that it is creating serious financial difficulties for both taxicab and PTC drivers. Taxicab and PTC drivers alike shared their personal stories and expressed exasperation at how difficult it has become to earn a living in their profession. They shared that they are now unable to make enough money to sustain themselves and their families. Participants requested that the City pursue interventions that would increase earnings. The interventions proposed by drivers and advocacy groups included imposing a licensing limit and securing worker protections for PTC drivers.

Driver wages are viewed as being intrinsically connected to the number of vehicles-for-hire that are allowed to operate in the city. The majority of comments related to driver wages were accompanied by requests for a licensing limit on PTC vehicles. Several participants explicitly cited the oversupply of PTC licences as the primary reason driver wages are falling within the city. They argued that more drivers competing for the same amount of work means lower wages for everyone.

Accessibility

Meeting attendees made **10** comments regarding accessibility. The following points summarize the key feedback attendees shared.

The proposed \$10 per trip incentive is not enough to improve wheelchair accessible service. All participants who provided feedback on the per-trip incentive agreed that the proposed amount would need to be higher for it to meaningfully offset the extra time and lost earnings that drivers experience when completing an accessible trip. One comment from a feedback form suggested that the amount should be \$20.

There were varied recommendations on how to improve wheelchair accessible service within the city. There was no consensus from meeting participants on one solution that would improve wheelchair accessible service in Toronto. However, participants did share their ideas about how wheelchair accessible service could be improved. One participant said that the City should invest in expanding the fleet of wheelchair accessible vehicles before introducing a central dispatching service because the service will not be useful if there are no wheelchair accessible taxicabs on the road. Another participant said that a central dispatching service must be appropriately staffed and easy to use. There was a suggestion that the City of Toronto should require 100% of taxicabs to be wheelchair accessible, similar to London, England. A participant said that the City should focus on more actively enforcing minimum accessible service requirements for PTCs. One meeting attendee indicated that it may be more effective for the City to invest exclusively in Wheel-Trans (TTC), as opposed to introducing a central dispatch service or grants/subsidies. They argued that rather than creating a new service, the City should expand a service (Wheel-Trans) that is already meeting the needs of users with accessibility needs.

Miscellaneous

Meeting attendees made **9** comments that did not fit into the categories above. The following points summarize the key feedback attendees shared.

Members of the taxicab industry expressed frustration that, in their opinion, that City could have previously done more to protect the taxicab industry and ensure fair competition with PTCs. Several meeting participants were visibly angry and upset, with their frustrations directed towards the City for not addressing the concerns they have raised since 2015. They critiqued the City for being reactive instead of proactive with its regulatory framework.

Insurance costs are very high, particularly for taxicabs, and there is a perception that the City has more strict insurance requirements for taxicabs versus PTCs. The City clarified that the insurance requirements for all VFH classes are the same in the by-law. City staff reiterated a point from their presentation that insurance rates are not part of the City's jurisdiction. The City does not set the rate for various insurance products offered for VFH; it is insurance companies that do this and that is what the City cannot control.

Next Steps

Public feedback is vital to the by-law review process. Feedback from this meeting, other meetings in this series of consultation, and the online survey will be included in an engagement report to be prepared by GPA. This report will be submitted to City Staff and will be included as an attachment to the staff report. The engagement report will be publicly available once the staff report has been submitted to Council. City staff will consider this report along with other inputs as they prepare a staff report with recommendations for Council. The staff report is expected to go to City Council by the end of 2024. For more information and updates on this review process please [visit the City's website](#).

Additional questions and comments can be submitted to vehicleforhire@toronto.ca.

Appendix A: Participant Questions and Comments

All of the questions and comments that were said by participants during the meeting or submitted on feedback forms have been included below. The questions and comments included have been edited for brevity and clarity and have been organized by the same themes used in the thematic summary for consistency. They are documented here as part of the public record.

The feedback captured below is a record of what was shared during the meeting. The feedback does not represent the opinions of GPA.

Licensing Limit

1. The City should be controlling the PTC licences for drivers and it should be one licence that the driver gets straight from the City. The driver would have control over their licence and they could go drive for someone else without being manipulated by these big corporations. In this way, you could control the number of licences appropriately. You wouldn't have to have the conversation of legislating wages. Many drivers are operating in the hole, and that needs to be fixed.
2. Taxis, limos and rideshare drivers have all been negatively impacted by unlimited licences for the rideshare companies. We need to remove the power of these corporations like Uber and Lyft over licences. I recently had my account deactivated by the big corps because of a mistake in the paperwork because of an old vehicle mix-up. There was nothing wrong with my new vehicle and yet they were able to take my livelihood away.
3. We would love to see active monitoring of the industry to ensure that it's working for everyone. We're trying so hard to find non-car ways to get around the City – both bike lanes and new transit projects are under construction. Only the City is in a position to make sure that this city works for everyone. From the consumer side there's an increasing monopoly here – taxi drivers only have 10% of the market. Customers feel like they have no choice in how to get around. I would love to have this be part of the discussion. Licensing is at the heart of this. The PTCs actually provide licences for every specific platform. They have to get every driver signed up through that licensing procedure again, which really slows down the process of new players entering the system with new business models.
4. We've seen a 300 percent increase in drivers but only a 183 percent increase in rides. This has led to more pollution and congestion and is a huge negative for the city. It's harming local businesses too because of the downward wage pressures and increased congestion. The City needs to reclaim control over the regulatory power. You've got to be setting the appropriate limits for these things. I hope you take them to heart because this is how members of the VFH industry are making a living, and if they can't make a living then that is bad for all of us.
5. Cabbies [taxicab drivers] are paying way more than PTCs to operate. Deregulation is crushing the cab industry. Limit PTCs like taxis, otherwise they are going to keep destroying the taxi business.

6. It seems like we've allowed unregulated players into the City and developed a licensing regime that was tailor made to PTCs. I don't understand why we aren't limiting the number of medallions or cars on the road. I would ask that you remember the depth of your ability to regulate. There are cities across the continent that are rejecting the idea that PTCs are deserving of special treatment.
7. The increased congestion from PTCs means that I can't get a taxi. On top of how many fewer taxis there are on the road, they can't pick me up because of the gridlock.
8. It is in the corporations' best interest to have as many idle drivers as possible so wait times are low for customers. They will give licences to everyone, which results in everyone driving around and not getting paid. The City has to reassert itself here. We know how it goes now. Some PTCs are public companies with shareholders pushing to get profit. It needs to be governed if it's going to be good for our city. It's time for the City to cap the number of licences.
9. Limit PTCs to 50,000 vehicles. The City has allowed PTCs to destroy the taxicab industry. They don't have third-party liability insurance. Using "vehicle-for-hire" as a term is not specific enough. We [taxicabs] pay \$7,000 for insurance while PTCs pay \$2,000, despite doing the same job. I started taxi driving in 1978.
10. Increase wages. Limit licences.
11. I encourage the City to take on the responsibility for licensing PTC drivers, directly, rather than having this be one of the roles of the platforms. Its in the interest of PTCs to have as many drivers as possible on the streets waiting for a trip (hence unpaid). In recent years PTCs have become increasingly opaque about pay per trip and driver pay. Limiting licences and doing so directly is the way to make driver pay better and to create a service that fits into the City's transit system.
12. Remove all limits for both cabs and PTC. The City should consolidate PTC and taxi licensing. Supply controls will not induce a mode shift to sustainable models. The high medallion [taxicab licence] prices in the past were a consequence of supply controls. The City should not consider yesterday's medallion [taxicab licence] prices.
13. We could issue a greater number of licences and then limit the number of vehicles that can operate at any one particular time. For taxis, 5,000 out of 8,000 could operate on the road at a time. For Uber, 10,000 out of 40,000. For Lyft 3,000 out of 25,000, and so on. These numbers can be changed but all should be at the same rate - taxi, Uber, Lyft. This way everybody can earn what they need. And we can have an extra incentive for people working on Friday night, Saturday night when the City needs it most.

Driver Wages

14. I did a report together with Ride Fair about what drivers earn. It came out to about \$7 per hour, in spite of Uber's claims that it pays drivers \$35 per hour. The difference is that Uber's measurement is all before costs. They're not counting any of the time that people are driving around waiting for a trip request, which is about half of any driver's time. They're not accounting for vehicle maintenance. Once you take those two things into account, those 35 dollars per hour become 7 dollars.

15. Most Uber drivers are newcomers to Canada, and they come to the biggest immigration hub in the country, Toronto. As a city we have all of these goals – this and that TO – but continuing to allow all of these PTCs to flood the road goes against every City objective that there is. This by-law is ensuring continued poverty for drivers of all classes, but especially the new drivers.
16. I get messages from people moving here that want to be PTC drivers, and I feel so bad for them. The wages will continue to reduce until we're operating in the negative. You [the City] know what is right. To allow for things to continue the way they are is unacceptable. City staff have an opportunity to lift these people out of poverty. These companies don't care. More and more corporations want to do this to us. By helping make recommendations to protect us, you can be an example of how to stand up to big corporations across Canada.
17. What is happening in the market sets the rate for wages. When you have plenty of low-skill workers immigrating to Toronto and working for PTCs fares will go down. Look at the rates of PTC growth. The City must balance its duty to citizens with its duty to drivers.
18. Invest in sustainable models.
19. PTCs are currently earning a big chunk of money out of the hard work of drivers. Drivers are not earning enough. The City shouldn't allow this big player to exploit people. We have different laws for different sets of drivers. People working more than 40 hours should have special rates. Many PTC drivers only want to work on weekends. They should have special rules for people who only work two days. Please consider.

Accessibility

20. I don't think a central dispatch service is what the community needs. All vehicles should be accessible all the time for everyone. It will cause other challenges, but it will be something that is sustainable going forward. If that means making a new business model for the meter and taxi service, then so be it. Everything else is a Band-Aid that will not really solve the problem. You've seen it in London, where all the vehicles are accessible.
21. Is \$10 enough to compensate drivers, especially with the cost of inflation? Is that going to make a difference to the driver? How did you get to \$10? Please consult passengers who need accessibility and the drivers who need those things, not just regular people. There are a lot of details and we don't know what you're saying. Please consult those who need accessibility services.
22. Why did we pick Calgary and Winnipeg as examples for the central dispatch service? I'm confused as to why we didn't pick 20-30 cities. If anyone has recently called 311, 911, or MLS, sometimes it takes 5-30 minutes for someone to answer. You come with these reports about lower wait times, so with the central dispatch service a staff response should be prompt.
23. I am an Uber driver. \$10 is not an enough. It takes way longer to complete an accessible trip and \$10 would not cover this cost. You need to have drivers on your panel.

24. With respect to improving the accessibility, we have had legislation governing ride share companies for 9 years. For 9 years PTCs have been required to provide accessible service. For 9 years they're not in compliance. They have not been in compliance since day 1. Why is it taking so long to do something?
25. I understand that there was a directive from City Council in 2016 (Council Decision LS10.3) to make all vehicles accessible. They decided to create Uber WAV [Wheelchair Accessible Vehicle] to make it more feasible for wheelchair accessible PTCs to operate. It has not worked and now it is impossible to get an accessible ride. Since this is a consultation, are you considering what it might look like to remove the entire PTC industry, like they have in other cities? It seems like PTCs have destroyed the VFH market.
26. Accessibility is an important topic but I don't have any useful comments.
27. Investing in anything other than Wheel-Trans for accessible service (TTC) opens the City to tremendous risk.
28. Please consult riders (passengers) who need accessibility and the drivers who accommodate those who need accessibility accommodation when increasing/charging accessibility. Please regulate wage and licences for PTCs \$10.00 is not enough to compensate drivers. This needs to be moved to \$20.00.
29. I've waited over 45 minutes for a pick-up / drop-off. It seems that PTCs are not equipped for wheelchairs. PTCs in Toronto are not equitable for those with accessibility needs.

Miscellaneous

30. The taxicab business is in extremely critical condition. It is extremely grave, extremely dire. The taxi industry is going to die and it's going to be PTCs from now on. I would like to buy defunct plates and be a taxi driver again, but I cannot. You're not going to have any taxicab vehicles anymore. The taxi business is dead, just has not had a proper burial.
31. I have been driving for 45 years now and some days I do not make anything. Taxicab drivers are in a hole financially.
32. Why do taxis and limos have a different licence compared to PTCs?
33. Give the inactive taxicab plate owners with no car an ultimatum: put a car on the road or the plate should go to someone on the list.
34. The signage is an issue. If I'm walking or cycling, then I know that a taxi can pull over at any moment. But with PTCs, because they're unmarked cars, I've had way more negative experiences when it comes to them randomly dropping people off without warning.
35. It seems like City does not care at all when it comes to regulations and PTCs. I can't just open a bar in a place the City says I can't open a bar, but it feels like a PTC can operate cars wherever they want if they say so. It's a system built for them.

36. Give the 1610 plates on the shelf to drivers on the waiting list. There are also lots of different plates (i.e. 1502, 1908, 2525) that are not in the system because they can't afford the driver renewal dues. Give the plates to drivers on the waiting list. Get an update. Many of these drivers are now deceased.
37. Is PTC surge pricing legal? Isn't it gouging? That is unfair to customers on busy nights and holidays.
38. Why is there regulation on taxi wages when PTCs are not subject to the same kind of regulations? How can I access the data/research done in 2016? Is the data publicly available? Why isn't there more equality between PTC drivers and taxi drivers when it comes to [licensing] fees, insurance and wages?

Appendix B

The following organizations had representatives identify themselves over the course of the meeting:

- Community Bikeways Toronto
- RideFair Coalition
- Rideshare Driver's Association of Ontario