

December 18, 2020

Angela Litrenta, Director (Acting)  
Ministry of Transportation  
Road Safety Program Development Office  
Safety Program Development Branch  
87 Sir William Hearst Avenue  
Building "A," Room 212  
Toronto, Ontario  
M3M 0B4

Ms. Litrenta:

**Re: 20-MTO091 Power-Assisted Bicycle (E-bike) and Cargo E-bike Pilot Program Proposals**

The Ontario Federation of Agriculture (OFA) proudly represents more than 38,000 farm family members across the province, supporting our members and the agri-food industry on issues, legislation and regulations governed by all levels of government. OFA works to ensure the agri-food sector and our rural communities are included, consulted and considered in any new and changing legislation that impacts the sustainability of our farm businesses. We are the leading agricultural advocate for Ontario farmers, their businesses and their communities.

As your branch is responsible for operational and program standards for driver training, testing and curriculum, we feel it is important to comment on some aspects of 20-MTO091.

OFA recommends all operators in control of cargo E-bikes using the roadway, be required to have at minimum a G2 or M2 driver's licence, so they have a rudimentary knowledge of the proper rules for safe driving. We recommend the minimum age of the operator align with Ministry of Transportation driver's licence requirements.

Proposing a pilot for road transport without the requirement for insurance exposes persons involved in accidents with these vehicles to unnecessary costs, and a lack of access to statutory accident benefits.

Regarding helmets, OFA recommends helmet use for all drivers and passengers of even the least motorized bicycle – a moped.

We recommend the definition of "motor-assisted bicycle" include requirements for licence, registration and insurance for all forms of E-bikes, and motor assisted mopeds.

To ensure clarity and awareness of enforcement, we recommend E-bike and Cargo E-bike regulations, requirements, and exemptions be applied as consistently as possible to the existing types of off-road vehicles that have on-road allowances.

Finally, and for consistency, when compared to 20-MTO092, the Pelee Island proposal to run golf carts on public thoroughfares, OFA notes that passengers in the Pelee Island proposal must be at least nine years old, while the Cargo E-bike proposal does not require a minimum age for passengers. We recommend the regulation for Cargo E-bikes include a minimum age for passengers.

Thank you for your consideration of these matters.

Sincerely,



Peggy Brekveld  
President

cc: The Honourable Caroline Mulroney, Minister of Transportation  
The Honourable Ernie Hardeman, Minister of Agriculture, Food and Rural Affairs  
OFA Board of Directors

