

## Public Works

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[peelregion.ca](http://peelregion.ca)

### BY ELECTRONIC SUBMISSION ONLY

December 18, 2020

Road Safety Program Development Office  
87 Sir William Hearst Avenue, Building A, Room 212  
Toronto, ON M3M 0B4

To Whom it May Concern,

### **RE: Region of Peel Comments on ERO Posting 019-2745 (Power Assisted Bicycle (E-bike) and Cargo E-bike Pilot Program Proposals)**

Thank you for the opportunity to comment on the Power-Assisted Bicycle (E-bike) and cargo E-bike Pilot Program Proposals.

The Region of Peel Long Range Transportation Plan (LRTP) Update is a 25-year plan to build communities for life and guide regional transportation policy through 2041. The LRTP serves as an overarching document for transportation planning in Peel. Its purpose is to make transportation in Peel easier, faster, greener, safer, and healthier. The LRTP Update considers moving goods and delivering services as an aspect of the regional transportation system.

Regional staff have reviewed the proposal and offer the following comments:

#### General Comments:

1. The Region of Peel has been advocating to the MTO for improved driver education through the license and testing program on safe interactions with pedestrians, cyclists, and micro-mobility services & systems such as e-bikes, bike share, e-scooters and encourage the Province to consider this in the updated e-bikes, e-scooter, and cargo e-bikes frameworks.
2. Further, MTO is encouraged to provide the Region and local municipalities with educational materials on the safe operation of e-bikes, e-scooters, and cargo e-bikes to increase public awareness.
3. Regional staff recommend that the frameworks prohibit the use of e-bikes, e-scooters, and cargo e-bikes on all highways.
4. The Region of Peel requests to be included in any further consultation on e-bikes and e-cargo bikes.

#### E-Bike Framework:

1. Regional staff recommend that the maximum speed limit be reduced to minimize risk of injury.
2. Given that the minimum operator age is proposed to be 14, Regional staff recommend that no passengers are allowed.

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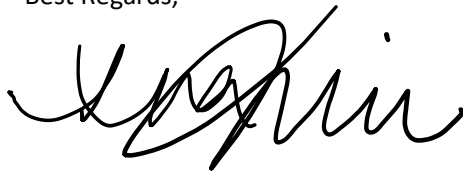
### Cargo E-Bikes Pilot Program

1. With regards to the use of cargo e-bikes by corporations for goods movement, Regional staff recommend that insurance be required for the safety of the operator, other road users, and cargo.
2. With regards to the use of cargo e-bikes by corporations for goods movement, Regional staff recommend that a license or certification be required to ensure safety of the operator, other road users, and cargo.
3. Regional staff would recommend appropriate education, training, certification, and licensing be provided on safety navigating and stopping to make deliveries on roadways.
4. Given that the proposed pilot program identifies that passengers are allowed, Regional staff seek clarity on whether the cargo e-bikes are also intended to provide a service that transports people in exchange for money.
5. Regional staff recommend that helmets be required for all passengers regardless of age.
6. Regional staff request clarity on whether an opt in/opt out option is available during the pilot phase.
7. Regional staff request further clarity on the duration of the pilot and type of technology required to evaluate the pilot, if any.
8. Regional staff request that MTO work with the Region and local municipalities to develop specific metrics for reporting in order to guarantee a meaningful and success pilot phase.
9. Regional staff encourage the Province to update the MTO's collision reporting framework / template to include e-bikes and cargo e-bikes
10. Regional staff request that aggregated data be shared with the Region and local municipalities.

Thank you for inviting feedback on the regulatory and policy framework for Power-Assisted Bicycles (e-bikes), and on the Cargo E- Bike Pilot Program. Region of Peel staff look forward to further discussions with the Ministry of Transportation on this proposal.

Should you have any questions regarding the Region's submission, please do not hesitate to contact the undersigned.

Best Regards,



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