

June 8, 2021

Angela Litrenta, Manager  
Ministry of Transportation  
Road Safety Program Development Office  
Safety Program Development Branch  
87 Sir William Hearst Avenue  
Building "A," Room 212  
Toronto, ON  
M3M 0B4

Submitted online via Ontario's Regulatory Registry

Ms. Litrenta:

**Re: 21-MTO034 Power-Assisted Bicycle (E-bike) Redefinition Proposal**

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.

OFA supports efforts to classify the different types of combined manual / power assist bikes, to help municipalities determine where each type can be safely used limiting access for all e-bike styles.

We recommend the definition for all E-bike types include requirements for licence, registration and insurance. To ensure clarity and awareness of enforcement, we recommend 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.

As stated in our December 2020 submission regarding MTO's proposal for Pilot E-bike and Cargo Bike Programs (Regulatory Registry # 20-MTO091), we believe that safety is the overarching objective in redefining e-bikes into three classes. OFA recommends all operators in control of 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 for all e-bike classes.



---

All classes of e-bikes should require insurance to protect persons involved in accidents with these vehicles from unnecessary costs and provide access to statutory accident benefits. Finally, and for consistency, we recommend the regulation for all E-bike classes include a minimum age for passengers.

Thank you for your consideration of these matters.

Sincerely,

A handwritten signature in black ink that reads 'Peggy Brekveld' followed by a period. The signature is written in a cursive, flowing style.

Peggy Brekveld  
President

PB/in

cc: OFA Board of Directors