



November 15, 2021

Chair and Committee Members  
Infrastructure and Environment Committee  
100 Queen Street W  
Toronto, ON  
M5H 2N2

Dear Chair and Committee Members,

### **Re: Automated Micro-Utility Device Oversight and Regulations**

On September 29, 2021, the Ministry of Transportation (MTO) posted a proposal on automated micro-utility devices (MUDs) soliciting feedback by November 15, 2021, on a regulatory framework for a provincial pilot project under the *Highway Traffic Act* (HTA). This pilot would allow remote-controlled MUDs, including automated personal delivery devices, for use primarily off-road in places such as sidewalks in Ontario municipalities. This proposal broadly covers devices that will not be defined as a motor vehicle in Ontario, are task-oriented, and operated to primarily provide services such as the delivery of goods and not passengers, and for operation primarily off-road on sidewalks. In addition, MTO has proposed the following for the device/vehicle:

- No height limit, a 125 kg maximum weight, and a 74 cm maximum width for all MUDs, except automated snow plows which have no proposed weight and dimension restrictions;
- A 10 km/hr maximum speed on sidewalks and a 20 km/hr maximum speed on shoulders of roads or bike lanes;
- A municipal opt-in and collision reporting regime, with authority to set by-laws and limit operations;
- Mandatory operator oversight, capable of creating a safe stop;
- Mandatory audible signals to alert those nearby;
- A requirement for reflectors and lights, with lights to be lit if operated between sunset and sunrise;
- A requirement for MUDs to be equipped with brakes;
- Prohibiting the carrying of controlled substances and dangerous goods that require a federal placard;
- General liability insurance, good working order, and secured loads requirements;
- A requirement to yield to pedestrians (no details on how); and
- A requirement for an operator name, contact, and unique device number to be displayed on the exterior of the MUD.

Transportation staff are reviewing this issue and have submitted comments to the Province after receiving feedback from the Toronto Accessibility Advisory Committee (TAAC) at its meeting on November 15, 2021. Members of TAAC, as well as deputants, shared their lived experiences and



pressed that it is our responsibility as a municipality under AODA that we work to remove barriers faced by people living with disabilities. This pilot would be yet another dangerous hazard in the public realm for anyone with low mobility, low vision, or using a mobility device as well as children and senior residents. TAAC unanimously adopted a motion recommending that City Council prohibit the use of, and parking, storing or leaving of MUDs on sidewalks and cycle tracks. Such devices are already prohibited on footpaths, pedestrian ways, and bike lanes, and similar clarity is required for sidewalks and cycle tracks.

It is critical that the City of Toronto develop the necessary policies and clarity to ensure the prohibition and enforcement of automated micro-utility devices (MUDs), reinforcing the City's commitment to accessibility and Vision Zero Road Safety.

## Recommendations

Infrastructure and Environment Committee recommends that:

1. City Council amend City of Toronto Municipal Code Chapter 886, Footpaths, Pedestrian Ways, Bicycle Paths, Bicycle Lanes and Cycle Tracks, as follows:
  - a. To insert in § 886-1B in alphabetical order a new definition of micro-utility device as follows:
    - i. MICRO-UTILITY DEVICE - Any device that:
      1. operates using any kind of power other than solely muscular power;
      2. is automated or remotely controlled; and
      3. transports itself and/or conducts tasks including transporting goods or cargo, but not passengers.
  - b. To insert a new Section C in § 886-15 as follows:
    - i. Despite anything in this chapter to the contrary, no person shall operate or stop a micro-utility device in a cycle track.
2. City Council amend City of Toronto Municipal Code Chapter 950, Traffic and Parking, as follows:
  - a. To insert in § 950-101B in alphabetical order a new definition of micro-utility device as follows:
    - i. MICRO-UTILITY DEVICE - Any device that:
      1. operates using any kind of power other than solely muscular power;
      2. is automated or remotely controlled; and
      3. transports itself and/or conducts tasks including transporting goods or cargo, but not passengers.



Ward 13, Toronto Centre  
 City Hall, 100 Queen Street West  
 2nd Floor, Suite A5  
 Toronto, Ontario M5H 2N2

Tel: 416-392-7903  
 Fax: 416-696-4300  
 councillor\_wongtam@toronto.ca  
 www.kristynwongtam.ca

- b. To insert a new § 950-203 as follows:
  - i. § 950-203. Regulation for Micro-Utility Device.
  - ii. No person shall operate a micro-utility device on a sidewalk.
  - iii. No person shall park, store or leave a micro-utility device on a highway or sidewalk.
- 3. City Council establish new offences and establish new associated penalties and amend City of Toronto Municipal Code Chapter 610, Penalties, Administration of, as follows:
  - a. Addition to Schedule A, Table 4: Chapter 886, Footpaths, Pedestrian Ways, Bicycle Paths, Bicycle Lanes and Cycle Tracks, which is commensurate with the fine amount for § 886-15B stopping a vehicle other than a bicycle in a cycle track:

Column 1 Designated Part of Chapter	Column 2 Short Form Wording	Column 3 Penalty Amount
§ 886-15C	Stop Micro-utility Device in Cycle Track	\$150.00

- b. Addition to Schedule A, Table 10: Chapter 950, Traffic and Parking, which is commensurate with the fine amount for § 950-400B(1) stopping a vehicle on/over a sidewalk/footpath:

Column 1 Designated Part of Chapter	Column 2 Short Form Wording	Column 3 Penalty Amount
§ 950-203B	Park – Micro-utility Device on (Highway/Sidewalk)	\$150.00
§ 950-203B	Store – Micro-utility Device on (Highway/Sidewalk)	\$150.00



# Councillor Kristyn Wong-Tam



Ward 13, Toronto Centre  
City Hall, 100 Queen Street West  
2nd Floor, Suite A5  
Toronto, Ontario M5H 2N2

Tel: 416-392-7903  
Fax: 416-696-4300  
councillor\_wongtam@toronto.ca  
www.kristynwongtam.ca

§ 950-203B	Leave – Micro-utility Device on (Highway/Sidewalk)	\$150.00
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4. City Council authorize the City Solicitor to introduce the necessary bills to give effect to City Council's decision and City Council authorize the City Solicitor to make any necessary clarifications, refinements, minor modifications, technical amendments, or by-law amendments as may be identified by the City Solicitor or General Manager, Transportation Services, in order to give effect to Parts 1 to 3, inclusive, above and the reasonable operation of the prohibitions against micro-utility devices.

Respectfully submitted,

**Kristyn Wong-Tam**  
Chair, Toronto Accessibility Advisory Committee