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Angela Litrenta, Director

Ministry of Transportation (MTO)

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:** **MTO’s Proposed Safer Roads and Communities Act, 2024**

The Métis Nation of Ontario (MNO) represents and advocates for the rights and interests of over 28,000 registered Métis citizens across the province. We address our members’ needs and priorities through program delivery and working with key partners, such as the Ontario government, to provide equitable opportunities for our citizens. We appreciate the opportunity to comment on the Ministry of Transportation’s proposed Safer Roads and Communities Act, 2024. The MNO’s feedback includes a combination of support and recommendations regarding the various provisions to enhance road safety and reduce accidents.

The MNO recognizes the need to address impaired driving and supports the proposed changes related to Combatting Alcohol and Drug Impaired Driving, Strengthening Public Safety, and Enhancing Alternative and Commercial Vehicles concerning safety initiatives for e-bikes. Specifically,

1. **Stricter Penalties**: The MNO supports the introduction of harsher penalties for dangerous driving behaviors such as impaired driving, stunt driving, and auto theft. These measures are crucial in deterring reckless driving and improving overall road safety.
2. **E-Bike Safety**: With the rise in e-bike popularity and related accidents, the MNO agrees with the proposal to classify e-bikes based on weight and speed to improve safety for all road users. We support the reengineering of e-bikes to make them not just safer, but more efficient and environmentally friendly (e.g. tire size, bike aerodynamics, battery type and efficiency).
3. **E-Bike Insurance Affordability**: MNO supports the requirement for e-bike insurance. However, since e-bikes have a large user base that is lower income, the insurance cost should be regulated to ensure affordability.
4. **Need for emissions controls**: The MNO recommends emphasis on the need for emissions controls to reduce/eliminate the use of ‘mopeds’ most of which have a gas-powered engine. The goal would be to phase out gas-powered engines. We recommend proposing/supporting emissions control legislation restricting moped use during extremely high pollution count periods.

We strongly support initiatives that enhance road safety while ensuring that proposed changes are effective and equitable.

Thank you for your ongoing interest in working with the MNO and the opportunity to provide input and have the MNO's voice heard on the proposed Safety Roads and Communities Act, 2024.

Sincerely,

Jennifer St. Germain

Chief Strategy Officer

Métis Nation of Ontario