

April 7, 2021

Angela Litrenta, Director  
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

Sent via email and submitted online through Ontario's Regulatory Registry and the Environmental Registry of Ontario

Ms. Litrenta:

**Re: ERO # 019-3295 / Registry # 21-MTO009 Golf Carts Pilot**

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 controls driver training program standards, testing and curriculum, we feel it is important to iterate our comments we sent you on December 18, 2020 with respect to Registry Posting # 20-MTO092.

Related to the Proposed Golf Cart Pilot Framework, OFA recommends driver qualifications include G2/M2 driver's licence, to be consistent with other licencing required for on-road use of off-road vehicles and to ensure operators have a rudimentary knowledge of the proper rules for safe driving.

Within the proposed framework, we note the operating requirement that a *maximum speed will not be more than 50km/h*. This is inconsistent with a second operating requirement - *cannot exceed a speed of 32 km/h*. Under the Ontario Highway Traffic Act O. Reg 215/17 PILOT PROJECT - LOW-SPEED VEHICLES, these vehicles are restricted to a maximum speed of 40KPH with restriction to only travel roads with a maximum posted speed of 50 KPH.

OFA recommends the Ministry clarify for the golf cart proposal whether 32 KPH is the governed maximum speed the cart will be allowed to travel, or whether there is an inconsistency in the proposed framework wording for maximum allowable speed of travel.

Regarding insurance requirements, insurance and registration should be mandatory; having no insurance exposes persons involved in accidents with these vehicles to unnecessary costs, and a lack of access to statutory accident benefits.

Regarding vehicle safety, OFA recommends the Ministry review the consistency of safety features listed for golf carts; daytime running lights, turn signals, brakes lights and seatbelts, to ensure any retrofit is of a minimum safety standard.

Farmers operating off-road vehicles as per the Off-Road Vehicles Act regularly face charges due to a lack of enforcement awareness of the rules governing farm use; adding golf carts exacerbates this lack of enforcement awareness. We recommend requirements, regulations and exemptions follow those in place, as consistently as possible, for various off-road vehicle use on throughfares.

OFA recommends MTO consider an on-road pilot for multi-purpose off-highway utility vehicles, as there is a large inventory of these vehicles, they include many safety features considered in the framework, and many of the features desired by proponents of the pilot proposal on Pelee Island.

Thank you for your considerations in these matters.

Sincerely,



Peggy Brekveld  
President

PB/in

cc: OFA Board of Directors