

February 6, 2020

City of London
Community and Protective Services Committee
300 Dufferin Avenue
London, ON N6B 1Z2

Subject: Pre-payment at the pump by-law

To Council Members of the Community and Protective Services Committee,

On behalf of the Canadian Independent Petroleum Marketers Association (CIPMA), we thank you for the opportunity to be consulted on the City of London's pre-payment at the pump by-law currently under review.

We understand drive-offs are an ongoing issue experienced by retailers right across the country and appreciate the pressure and capacity constraints they place on municipal police.

Our first and foremost concern is always the safety of our Members' employees when drive-offs occur. We believe that adequate training and education on this issue is paramount to improving workplace safety. To that end, we have been diligent in engaging our Membership to ensure their employees understand that it is not their role to intervene in drive-offs, nor will they be financially penalized for them when they occur.

To that end, while we support the spirit of the proposed by-law and its intent to support workplace safety while reducing the capacity pressures on London police, we do not support a patchwork of by-laws mandating pre-payment. We would support a province wide approach – should there be political will to do so – that balances broad application of pre-payment practices with concessions for small and rural retailers as applicable, who may not have the financial means to effectively implement a pre-payment option.

We thank you for your thoughtful consideration on this matter and look forward to continuing an open dialogue to ensure an effective approach is implemented.

Please do not hesitate to contact us should you have any questions or concerns.

Sincerely,



Jennifer Stewart
President and CEO
Canadian Independent Petroleum Marketers Association