



July 30, 2021

Patricia Boyle
ADM and Superintendent of Motor Vehicles
Ministry of Public Safety and Solicitor General (PSSG)

The British Columbia Cycling Coalition (BCCC) has reviewed the [*BC Road Safety Strategy 2025*](#), released in May of this year. It is a positive document outlining the range of road safety programs and initiatives in place at various B.C. Government departments and among its many partners or agencies.

We are particularly pleased to see the continued emphasis on the Safe Systems Approach, first adopted by British Columbia in the *"2015 and Beyond" Road Safety Strategy* report (2013).

We appreciate the 'spotlight' on our revised and soon to be released Bike Sense guide. We are also pleased to see particular needs and concerns of vulnerable road users acknowledged and how design innovations such as protected bike lanes are improving safety for all road users. Thank you for your efforts and the continued communication of road safety initiatives in our province.

Active transportation is exploding across B.C.

For over 25 years, the BCCC has led efforts in the province to advance bicycling as a viable and attractive transportation choice in our cities and towns. We believe active transportation and well-connected transportation systems are critical components of safer, healthier, livable and more prosperous communities. While cycling is our primary focus, we are keenly interested in all aspects of road transportation, particularly where conflicts and interactions among different travel modes are commonly experienced.

We are paying close attention to the rapidly changing transport system in B.C. and elsewhere. Commuting by bike is the fastest growing mode of transport in Canada. E-bikes are selling faster than E-vehicles in many jurisdictions. Other active transport modes and travel choices – scooters, hoverboards, cargo bikes, car- and ride-share, to name a few – are now visible and functional options in communities across B.C.

The new Road Safety Strategy 2025 emphasizes the need for *"ongoing effort and commitment from the entire road safety community... to support a vision for working together to reduce fatalities and serious injuries."* We make the following comments and suggestions in that spirit, aiming to contribute to continued effective strategies to improve road safety across B.C.

Bolder Strategies needed to meet the target 50% reduction

As described in its introduction, the Strategy is a *"framework that outlines the network of tools, initiatives, awareness campaigns and enforcement programs."* As such, it primarily describes the current state of programs available and underway rather than a new set of initiatives. At the same time, the Strategy re-commits to the goal *"reducing road traffic deaths and injuries by 50% by 2030"* joining many other jurisdictions in the declared target of the Stockholm Declaration.

We believe British Columbia still requires a bolder and more concerted Road Safety Strategy to meet the target 50% reduction in traffic deaths and injuries. The Strategy's framework of initiatives and programs are not sufficient, and supplemental efforts and policies are required.

The Strategy emphasizes the overall downward trends in injuries and deaths. However, these recent improvements are primarily due to changes in vehicle design to better protect occupants of motor vehicles. As the report notes elsewhere, "*injuries and fatalities involving collisions between vehicles have declined, similar downward trends are not happening when it comes to vehicle collisions involving cyclists and pedestrians.*" This divergence – decreased risk for vehicle occupants but increased risk for vulnerable road users – identifies an area to which greater attention is required.

Moreover, the recent improvements in road safety are mostly due to better vehicle safety design and standards that largely protect the occupants of motor vehicles. The situation is different for vulnerable road users – people on foot, bicycles, wheelchairs and other modes.

Further, the Strategy document appears to assume that an overall decline in injuries and deaths will continue in the current policy context and transport environment. However, a growing population, increases in vehicle kilometres travelled (VKT), larger vehicles and a complex array of diverse transport modes may flatten or reverse these positive trends, with even greater risk for vulnerable road users.

Protecting vulnerable road users

Larger vehicles, distracted driving, dashboard controls and data screens are among several factors that result in greater risks to vulnerable road users – primarily people on foot and bike. Speed and road design continue to be significant issues with high risk to all road users.

We believe a robust Road Safety Strategy would signal a stronger commitment to address and mitigate those very present risks to vulnerable road users – again, the one group of identifiable road users where crashes, injuries and death are increasing on B.C. roads.

Specifically, we would like to see action on Safe Passing Distance legislation, similar to that in place in five other Canadian provinces and 34 other jurisdictions in North America. The Strategy document also mentions the safe speed pilot programs underway in several B.C. municipalities, but there is no suggestion to expand the program to more municipalities or province-wide.

More broadly, the Strategy documents barely mentions the Motor Vehicle Act (which dates from 1957). [Multiple stakeholders](#) have called for a full review and update of the MVA Act, which is clearly out-of-step with the changing transportation landscape in B.C. ¹

Proven advanced road designs needed province-wide

The Strategy document rightly notes that "*protected bike lanes, high-friction surfaces and other targeted road infrastructure changes will help save lives.*" Several of the 'spotlight' sections further highlight road designs and engineering that directly improves road safety outcomes for pedestrians and cyclists. The [Moving to Vision Zero](#) document (2016) provides even more examples of successful design interventions in B.C. communities: protected intersections, raised crossings, narrowed lanes, leading pedestrian intervals, advanced signals and more.

¹ [Modernizing the Motor Vehicle Act](#)

However, there is no clear commitment to further advance and invest in those proven improvements in road safety and infrastructure in B.C. communities. In fact, B.C.'s Ministry of Transportation and Infrastructure exempts itself from guidelines in the recently released *BC Active Transportation Design Guide* (except in certain cases of new construction). Revisions and updates to the AT Design Guide should include evaluations of road designs in real-world contexts that are consistent with the Safe Systems approach (e.g. a transport environment forgiving of human error). Members of the Steering Committee and the B.C. Government could all play a significant role to promote, support and fund a more aggressive strategy to advance road design solutions throughout the Province.

The target to reduce deaths and injuries by 50% by 2030 is only eight short years away. How exactly will that ambitious goal be accomplished in B.C.? Well-established solutions can and should also be adopted in policy, legislation and operational practices. For example, Safe Passing Distance legislation could be adapted from other jurisdictions where such legislation is in place and showing demonstrable success.

To cite another example: intersections are clearly identified as "*high-risk areas for collisions between different road users.*" Why not a concerted effort to introduce best engineering and design practices – such as protected intersections, advanced and dedicated traffic signals and leading pedestrian intervals – to communities across B.C.?

Broader more equitable data collection

Pillar 2 in the Road Safety Strategy outlines current efforts on data collection in B.C. However, the relevant agencies mentioned (ICBC, police services, coroner's service and the Commercial Vehicle Inspection Agency) operate primarily within the motor vehicle sphere.

There is considerable room to improve data collection of collisions and incidents involving active transportation users – including incidents that do not include motor vehicles. Data collection needs to be drawn from all road users and clearly differentiate between modes. We need more equity in data collection in B.C. to accurately identify road safety issues and solutions; what gets measured gets noticed, and only then can it be fully addressed.

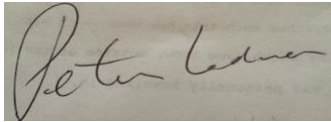
It is widely understood that many incidents involving pedestrians and cyclists are under-reported. This gap remains under-appreciated and can be resolved with new actions and better practices – especially via agencies such as ICBC, the B.C. Coroner and other authorities.

Future contributions

Road Safety Strategy 2025 was prepared by a Steering Committee of experts and agency representatives. Contributions represent input from a wide range of fields and agencies. Several BCCC Board members took part in the virtual townhall session early in 2021, and then followed up with initial comments and observations.

We believe further representation from more user groups – including the leading B.C. cycling organisations – would bring additional perspectives to the Steering Committee and its sub-committees. Both the BC Cycling Coalition and HUB Cycling partnered on the 2016 *Moving to Vision Zero* report, along with 38 other stakeholders. Participation from walking, mobility and disability groups, as well as racialized and equity-seeking groups would ensure broader perspectives are heard and reflected in road safety issues and solutions going forward.

Thank you for your consideration

A rectangular image showing a handwritten signature in dark ink on a light-colored background. The signature is written in a cursive style and appears to read "Peter Ladner".

Peter Ladner, Chair
B.C. Cycling Coalition

cc:

Honourable Mike Farnworth, Minister of Public Safety and Solicitor General

Mark Sieben Deputy Minister, Ministry of the Solicitor General

Dr. Martin Lavoie, Deputy Provincial Health Officer, Office of the Provincial Health Officer

Lisa Lapointe, Chief Coroner, Ministry of Public Safety and Solicitor General

Kjerstine Holmes, Director, Policy, Research & Data (PSSG)

Erin Anderson, Senior Manager, Corporate Priorities (PSSG)