

Monday, January 28, 2013

The Honourable Denis Lebel
Minister of Transport, Infrastructure and Communities
Transport Canada
Place de Ville, Tower C, 29th Floor
330 Sparks Street, Mail Stop: XA
Ottawa, Ontario K1A 0N5

Dear Minister Lebel:

On behalf of the Board of **Canada Bikes** – *the national voice for commuter, touring and recreational cycling* – I am writing to support Private Member's Bill C-344, which would make a significant contribution to road safety and assist fuel efficiency by requiring trucks operating on Canada's roads to be equipped with side-guards, or side-skirts that provide equivalent safety for vulnerable road users.

The Bill was introduced after yet another tragic truck-related accident, this time involving a pregnant young woman from Toronto, killed while riding her bicycle. Collisions such as this one, in which the installation of sideguards could have played a role in avoiding a fatality or reducing the severity of injuries, regularly happen across Canada.

Even with the current low rates of cycling and walking in Canada, significant fatalities are associated with truck traffic. With an ever increasing number of people walking and cycling in communities across Canada and all levels of governments committed to increasing active transportation levels, it is essential that the Government of Canada take action to reduce the chances of fatalities, injuries and disabilities.

With Transport Canada estimating the economic cost of a single traffic fatality ranging from \$7.5 million to \$19.7 million (in 2004 dollars), we expect that the benefits of sideguards to rapidly outweigh the cost of this safety initiative by the Federal Government. It is also worth considering that traffic fatalities, injuries and disabilities have a devastating impact on families, communities and businesses, while the life-cycle cost of sideguards, over the long term, will have very minimal impacts and a number of peripheral benefits, even to those who pay for them.

Sideguards not only promote pedestrian and cycling safety, but, integrated as aerodynamic fairings and skirts, they can be part of an effective strategy for fuel savings and competitiveness for the trucking sector¹. While leading the Centre for Sustainable Transportation, I worked with the Government of Manitoba and Manitoba Trucking Association to develop financial support programs for aerodynamic technologies and trucking fuel efficiency measures. Several provinces had, or have, similar programs. We suggest that these types of programs are a win-win for pedestrian and cycling safety and the fuel efficiency of the trucking industry.

¹ Larson, Paul D., Elias, Arne and Viafara, Jairo "Toward Sustainable Trucking: Reducing Emissions and Fuel Consumption," Transportation Journal Nov 2012

In June and September of last year, Ontario's chief coroner called for mandatory truck sideguards in order to save lives. This recommendation came after a detailed review of cycling and pedestrian deaths since 2006 and 2010 respectively. Previous studies by the coroners in British Columbia and Toronto have shown a disproportionate percentage of cyclist deaths resulting from collision with a truck or other heavy vehicle.

In response to these studies, Transport Canada concluded that sideguards, mandatory in Europe for over 30 years, would not be effective in Canada due to different road and weather conditions, and would put Canadian trucks at a competitive disadvantage. In fact, most fatalities occur in urban centers that have similar road and weather conditions to European cities. In addition, numerous European and global studies have shown that closed sideguards are competitive on tractor-trailers, providing up to 7% fuel savings through improved aerodynamics during the highway portion of the drive cycle².

The human costs of both right-turn accidents and accidents as a result of a truck passing a cyclist or pedestrian, can be reduced by both by supporting the proposed legislation and by equipping of Canada's truck fleet with some form of under-run protection which prevents people from falling under the truck and being crushed by the rear wheels.

Many Canadians have been devastated by the loss of a loved one in truck-related accidents which could have been prevented had sideguards been in place. Canada Bikes respectfully requests that, as Minister of Transport, you support this bill in order to save lives, reduce fuel costs and achieve the Government's environment targets while providing program support for the trucking industry.

Sincerely,

A handwritten signature in black ink, appearing to read 'Arne Elias', written over a light blue horizontal line.

Arne Elias PhD MBA

On behalf of the Board of Canada Bikes

² Sowinski, Lara L. (2010), "Greening Your Fleet," World Trade, February, pp. 24-27.