



To inspire and influence the evolution of integrated urban mobility

BUS PASSENGER SAFETY BRIEFING

Submitted on May 1, 2019

The [Canadian Urban Transit Association](#) (CUTA) thanks members of the House of Commons' Standing Committee on Transport, Infrastructure and Communities (TRAN) for the opportunity to submit this briefing on bus passenger safety.

The safety and security of passengers, operators and the public are the single most important priority of CUTA members from coast to coast. Canadian transit systems, private and public transportation operators, coach, school and transit bus manufacturers, and component suppliers all strive to meet and exceed regulatory safety requirements for their products and services. CUTA members spend millions of dollars annually on industry research and development to innovate for the transit of the futureⁱ. Public and user safety are at the heart of this work.

Travel by school bus, transit bus and intercity bus (coach) are amongst the safest modes of public transportation in Canada. The facts are unambiguous when you break down the statistics for each of these modes. According to Transport Canada, school buses are the safest mode of transportation. As of 2018, students were roughly 80 times more likely to get to school safely by bus than by carⁱⁱ.

Using CUTA data, the Victoria Transport Policy Institute (VTPI) published a report in July 2018 that found that passengers on public transit experience fewer than one in ten of the per-kilometre collisions that automobile occupants doⁱⁱⁱ. Furthermore, transit-reliant communities in Canada that focus on pedestrian, cyclist and passenger transit services have fewer than one in five of the total per-capita traffic incidents associated with car-dependent communities.

The VTPI report also showed that intercity bus travel is significantly safer than automobile travel in urban and rural environments in Canada. In fact, intercity bus travel has a fraction of the reported collision casualties of car travel in rural areas.

Given these facts and the important work underway in the Committee, which CUTA understands to be focused on seatbelt initiatives in coaches and in school buses, our association is pleased to outline the potential implications for all three modes of transportation, as well as the existing safety features that empower our members to move people safely and effectively.

Intercity bus

Transport Canada has mandated seatbelts on medium (more than 4,536 kilograms) and large intercity buses as from September 1, 2020. The objective is to improve bus occupant safety in serious collisions. Canadian federal law aligns with equivalent regulations in the United States, with the difference being that U.S. law does not cover medium-sized buses without a luggage compartment under the passenger deck.

As a result of existing U.S. requirements for seatbelts on large intercity buses, Canadian manufacturers provide seatbelt-equipped coaches, and private transportation operators crossing the border offer seatbelt-equipped services. Coach operators in Canada ensure that passengers wear their seatbelts via a combination of onboard signs and safety announcements. Intercity bus drivers monitor for compliance to ensure that seatbelts are worn appropriately and conduct pre-trip safety inspections to confirm that seatbelts are in good working order.

Transport Canada is currently assessing whether to legislate for revised crashworthiness standards for buses with a gross vehicle weight rating in excess of 11,793 kilograms to reduce the risk of injury from frontal impact, side impact, rollover and/or crush protection. CUTA members, including bus manufacturers and private transportation operators, look forward to being consulted by Transport Canada if the department goes ahead with this work.

School bus

Transport Canada has introduced technical requirements for school bus operators that voluntarily choose to install lap-shoulder seatbelts. These requirements ensure that the seatbelts are properly installed, and that they do not compromise the bus compartmentalization design, i.e. one that includes high padded seat backs to ensure passenger safety^{iv}.

A new federal-provincial/territorial Task Force (TF) was established in January 2019 to study the use of seatbelts in school buses. The TF will consult with school boards and school bus manufacturers during its work. While the federal government can mandate the use of seatbelts on new school buses, the retrofitting of existing buses falls under the jurisdiction of the provinces and territories. A pilot project to fit school buses with seatbelts is being planned in Saskatchewan later this year.

Considerations have been raised by experts and some CUTA members on the practicalities of enforcing the use of seatbelts amongst small children on school buses. The lack of 'one-size-fits-all' seatbelts designed for youth across a range of ages, when body sizes vary considerably, is a challenge. This has important ramifications on the effectiveness of a seatbelt as a safety tool. Would school bus operators be responsible for ensuring that belts are always worn properly? Would operators also be responsible for ensuring that belts are kept in good working order?

CUTA and its members support efforts to make public transportation safer, including school bus travel. We encourage the federal government to consult with bus manufacturers and school bus operators to ensure that future regulations are fit for purpose and deliver on their intended objectives.



Transit bus

The definition of a transit bus as per Canada’s Motor Vehicle Safety Act is one that is “specially designed with space for standing passengers and that is equipped with a stop-request system”^v. Transit buses are excluded from federal regulations mandating seatbelts, with the exception of type 2 manual seatbelts used by the bus driver. Buses by definition have seating for more than ten passengers. The change to legislation in July 2018 that mandated seatbelts on medium and large intercity buses as from September 2020 does not apply to transit buses^{vi}.

The standing-room feature of transit buses is an important component of capacity management and route planning for transit operators. Seating is usually preferable to standing from a rider experience standpoint, however the carrying capacity of buses increases with standing-room at no detrimental impact to passenger safety. Existing features such as stanchions, hand straps, slip-resistant flooring and secure emplacements for mobility-restricted passengers provide significant additional safety for riders on transit buses of all types. In addition to these features, bus operator training, speed limitations and defensive driving techniques all enhance overall safety for passengers.

There is always room to improve the safety and security of transit. An important part of CUTA’s mandate is to provide transit industry stakeholders and experts with a forum to share best-practices and make improvements. Our members prioritize the safety and security of passengers and the public when operating and maintaining their fleets. This is evident in the routine and thorough safety checks that are in place at transit systems across Canada, including frequent vehicle maintenance, inspections and testing, and regular driver training. Transit systems also maintain high-levels of security at operating installations and passenger stations that have experienced strong user growth over the past decade.

CUTA and its members remain ready and available to consult with Members of Parliament and Transport Canada to discuss effective ways to improve safety and security in public transportation and the surrounding environments.

ⁱ Canadian Urban Transit Association, *Innovation in Canada’s Public Transit Industry*, http://cutaactu.ca/sites/default/files/2103_exec_report_eng.pdf, accessed on April 18, 2019.

ⁱⁱ Transport Canada, *About school bus safety in Canada*, <https://www.tc.gc.ca/en/services/road/school-bus-safety/about-school-bus-safety-canada.html>, accessed on April 15, 2019.

ⁱⁱⁱ Litman, T., *Safer Than You Think! Revising the Transit Safety Narrative*, Victoria Transport Policy Institute, published on July 24, 2018.

^{iv} Transport Canada, *School Bus Passenger Seating and Crash Protection*, <https://www.tc.gc.ca/media/documents/acts-regulations/TSD-222-EN.PDF>, accessed on April 18, 2019.

^v Government of Canada, *Motor Vehicle Safety Regulations*, https://laws-lois.justice.gc.ca/eng/regulations/C.R.C.,_c._1038/page-1.html?txthl=bus#s-2, accessed on April 18, 2019.

^{vi} Canada Gazette, *Regulations Amending the Motor Vehicle Safety Regulations (Bus Seat Belts and Other Amendments)*, <http://www.gazette.gc.ca/rp-pr/p2/2018/2018-07-11/html/sor-dors143-2-eng.html>, accessed on April 16, 2019.

