

July 10, 2015

VIA EMAIL: RoadSafetyBC@gov.bc.ca

Honourable Suzanne Anton  
Attorney General and Minister of Justice  
Ministry of Justice  
PO Box 9044 Stn Prov Govt  
Victoria, BC V8W 9E2

Dear Minister Anton:

Insurance Bureau of Canada (IBC), on behalf of its members, is pleased to respond to the Province of British Columbia's public consultation on distracted driving. We appreciate the opportunity to provide comments on the current law and potential changes to penalties for using hand-held electronic devices while driving.

As the national association representing Canada's private home, auto and business insurers, IBC works on behalf of its members to educate consumers on how best to protect their homes, cars, businesses and properties. IBC members account for approximately 90 percent of the private Canadian property and casualty (P&C) insurance market, providing over 118,000 jobs across the country.

For decades the industry has been a leading voice in road safety efforts that save lives and reduce injuries. Many of today's most effective road safety measures – the mandatory use of seatbelts, provincial graduated driver licensing programs, and stronger penalties for impaired driving – have, in part, been the result of the insurance industry's advocacy.

While road safety concerns continually evolve, driver distraction is the number one road safety issue facing Canadian drivers today and is a leading cause of fatalities on our roadways. Our industry is committed to combatting this and to improving driver behavior by focusing on three key catalysts for change – social acceptance, legislation, and law enforcement.

### Social Acceptance

To reduce the social acceptability of driving while operating a mobile device, IBC has been a strong public voice on distracted driving issues, continually educating consumers about the dangers of distracted driving through ad campaigns and community outreach. According to a Virginia Tech Transportation Institute study<sup>1</sup>, drivers engaged in text messaging on a mobile device are 23 times more likely to be involved in a crash or near crash event compared with drivers who are focused on the road. Educating consumers about these risks can help reduce the incidence of distracted driving, leading to fewer collisions and injuries, and to safer roads.

Key to the effectiveness of any changes to current laws and penalties for distracted driving is the inclusion of a public awareness campaign before and after their introduction. A concentrated effort in this area should not only include a discussion of the penalties and the date they come into effect, but also the risks associated with the behavior they intend to change. In addition to increased penalties,

<sup>1</sup> Virginia Tech Transportation Institute, News Release, "New data from VTTI provides insight into cell phone use and driving distraction" (July 29, 2009).

IBC encourages the Province of British Columbia to make public education and awareness a central component of its response.

#### Legislation

We know that public awareness and education will not be sufficient to change consumer behavior. That is why IBC supports the efforts of provincial governments across Canada that have passed laws banning the use of hand-held electronic devices, including cellphones, while driving. Penalties vary by jurisdiction but almost all provinces now utilize a combination of monetary fines and demerit points as a deterrent to this behavior. In British Columbia., the fine for distracted driving is \$167, the second-lowest in Canada. The British Columbia penalty also includes three demerit points against the driver's license.

To deter behaviours associated with distracted driving, IBC continues to be of the view that offending drivers should face a combination of fines and demerit points, which has proven to be more effective in changing driver behaviour than fines alone. To discourage their use and unsafe driving behavior, penalties should be reflective of the risk drivers face when using hand-held devices. IBC encourages the Province of British Columbia to increase the current penalties for distracted driving to a level more reflective of the significant risks, and will act as an effective deterrent to using hand-held devices while driving.

In other road safety matters, such as impaired driving, British Columbia has been at the forefront in Canada and has seen the impacts of what tougher laws can accomplish. In 2010, your government introduced tougher impaired driving laws that have resulted in a 52% decrease in alcohol-related motor vehicle deaths, as well as a significant reduction in injuries and property damage<sup>2</sup>. IBC applauds the government's efforts in this regard, and we are hopeful that new strict measures implemented by the Province of British Columbia to reduce the incidence of distracted driving will result in similar positive results.

#### Law Enforcement

Another key aspect of changing driver behavior is the emphasis of enforcement of penalties. Following the introduction of any new penalties and an associated public awareness campaign, IBC encourages the Province of British Columbia to aggressively pursue enforcement activities to ensure that the new penalties are acted upon. Measures such as this will help ensure compliance with new laws and will ultimately lead to safer roads.

We appreciate the opportunity to comment on this important public policy safety issue and would welcome any further discussion that may result.

Sincerely,



William A. Adams

<sup>2</sup> BC Ministry of Justice, News Release, "In memory of Alexa, 190 lives saved on B.C. roads" (February 24, 2014).