



Ottawa, March 9, 2010
File # V1325

Honourable Kash Heed
Minister of Public Safety and Solicitor General
PO Box 9053, Stn Prov Govt,
Victoria, BC V8W 9E2

Dear Minister Heed,

The Canada Safety Council believes the regulations pertaining to the Body Armour Control Act proposed by British Columbia do not truly reflect the intent of the Act. The background material suggests the reason for the Act is to prevent criminals from acquiring and using the same protective gear used by police forces. Unfortunately, as presented, the proposed regulations would remove the opportunity for tens of thousands of British Columbians to purchase and use this vitally important safety equipment.

Synthetic materials such as Kevlar™ and ballistic nylon are widely used in everything from the protective gear used by loggers to thousands of motorcyclists, ATV riders, dirt bike riders and others who wear protective jackets, pants, gloves and helmets while riding. In the case of motorcyclists for example, Kevlar™-reinforced ballistic nylon jackets and pants have become widely accepted as the most user-friendly form of protective gear that can be worn while riding a motorcycle. The Canada Safety Council recommends the use of protective equipment made from these materials. In the past, leather was the preferred method of protecting motorcyclists when riding. However, for the past twenty years there has been a move away from leather, which has its limitations, to jackets, pants and gloves made from suitable synthetic materials.

The introduction of these proposed regulations would mean that tens of thousands of British Columbians would be forced to find alternative forms of protection from abrasive or puncture wounds as a result of recreational or justified professional use, instead of wearing Kevlar™ or ballistic nylon and armour padding. Consequently, those same thousands of British Columbians would be required to apply for and pay a fee to use protective clothing that many other places have widely available to them at no fee.

Each year, thousands of professional and recreational users of Kevlar™, ballistic nylon and armour-padded garments, visit British Columbia. The regulations, as written, would place the unwitting users of these materials in contravention of British Columbia law.

There is a significant difference between the use of Kevlar™-reinforced clothing for a myriad of legitimate uses and those items of clothing intended to protect police officers from injury or death while on the job. The regulations do not reflect that reality.

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The Canada Safety Council strongly urges and recommends that the regulations, in their present form, be withdrawn and a much wider consultation with all affected stakeholders be undertaken.

The regulation must be explicit to police protective garments, such as bulletproof vests, which are not used by the public to prevent work and recreational injuries or fatalities.

Sincerely,



Raynald Marchand,
General Manager, Programs

- cc. Sylvia Montagnaro, BC Policing and Community Safety
Jack Smith, President, Canada Safety Council
Paul Boase, Transport Canada, Chair of the Vulnerable Road User Taskforce