

道路安全研究小組  
Community for Road Safety

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14 December 2016

The Chairman  
LegCo's Panel on Transport  
Legislative Council Secretariat,  
Legislative Council Complex  
1 Legislative Council Road  
Central, Hong Kong

Attention : Hon CHAN Han-pan, JP

Dear Legislative Council Members,

Comments on "Increasing the Seating Capacity of Light Buses"

We refer to paper CB(4)285/16-17(03) on "Increase the seating capacity of light buses". While we generally concur with an increase of capacity, we also wish to highlight the following points in view of the heavy use of these vehicles on high speed roads including expressways:

1. Any change in seating capacity should take into account occupants' safety. Opportunities should be grasped to enhance the safety provision of minibuses. In particular, new minibuses should be equipped with 3-point safety belts in conjunction with seat structures which are well engineered. The use of seat belt reminder should be considered.
2. There is a need for better protection of rear seat passengers in case of a rear-front collision. Current minibus design results in rear-seat passengers almost directly in touch with the rear window. As a result, these passengers are exposed to a disproportionate risk of severe injuries on high speed roads where rear-front collisions are common.

The paper touches upon various issues on improved provisions on these vehicles, but evidently has omitted the primary need to address occupants' safety with the higher seating capacity. It should be noted that currently minibuses have an accident rate by mileage twice the average figure.

Yours faithfully,

Julian TH Kwong  
(signed)  
Chairman, Community for Road Safety