



The Hon. Mike Goosney
Minister of Government Services
Department of Government Services
PO Box 8700
2nd Floor, West Block
Confederation Building
St. John's, NL

Re: Supporting Safer Roads and Communities through Highway Traffic Act Consultations

September 1, 2026

Dear Minister Goosney,

On behalf of the Canadian Paediatric Society (CPS), I am writing in response to the public consultation to ensure Newfoundland and Labrador's Highway Traffic Act remains current, effective and responsive to evolving road safety issues. I am particularly concerned about the risks to child and youth health and safety posed by the rise of e-bikes, e-scooters and other micro-mobility devices and hope that this consultation will lead to a modernization of the Highway Traffic Act to better recognize and respond to the risks these devices pose to children and youth.

As paediatric healthcare providers, CPS members directly care for a growing number of children and youth with injuries associated with the use of powered personal micro-mobility devices such as e-bikes and e-scooters. New data released in the [Canadian Paediatric Surveillance Program's 2025 Annual Report](#) found that 57 cases of serious paediatric injuries or death were reported in Canada last year. These include 10 deaths, 12 intensive care unit admissions, and 26 prolonged hospitalizations. Head injuries were found to be the most common, accounting for 47% of all cases, and most cases involved an e-scooter used recreationally on public roads, sidewalks or pathways, typically by a single rider operating without a helmet or adult supervision. Most cases (60%) involved males and the age group most affected was 10- to 15-year-olds (42%), followed by 5- to 9-year-olds (18%). In fact, almost 80% of cases with age reported involved children under the age of 16.

This new data emphasizes a critical need for regulatory action to better protect the health and safety of children and youth, including through establishing and enforcing a [minimum age requirement of 16 to operate e-scooters or e-bikes or to ride on them as passengers](#). E-scooters and e-bikes are not toys and were not designed for children. Children under 16 do not typically have the strength, coordination, or experience needed to safely operate these devices. Because these devices speed up quickly and can travel at high speeds, riders need significant skill to operate them safely, especially in traffic.

In addition to ensuring an age minimum of 16 years of age, public education initiatives should be expanded to increase awareness around [safety tips to reduce the risk of severe injury](#), including:

- Always wear a well-fitting helmet with an approved standards label (See also: Advice for parents from the Canadian Paediatric Society on [bike helmets for children and youth](#))
- Ride in protected bike lanes where available and stay to the right side of quiet streets

- Never carry or ride as a passenger
- Always pay attention to surroundings
- Adjust speed to driving conditions
- Wear bright or reflective clothing, especially if riding at dusk or in the dark
- Do not use a cell phone while riding
- Do not ride with headphones or earbuds in
- Obey traffic laws and avoid busy roads
- Read and follow all manufacturers' warning, including age and weight requirements
- Do not 'jailbreak' devices (i.e. change speed or acceleration settings)

In addition, provincial and municipal governments can support safer roads and communities through enhancements to the built environment, including:

- Installing more protected (and ideally, elevated) bike lanes, particularly around areas of high use by children and youth such as schools, community centres, and recreation and play spaces
- Deploying more speed and red-light cameras in high traffic areas near schools, busy neighbourhoods, and recreation and play spaces
- Implementing traffic calming measures where children and youth live and play
- Adopting '[Vision Zero](#)' interventions that increase road safety for all users
- Increasing helmet use among children and youth through education, legislation, and training programs (with evaluation and follow-up). Mandatory helmet legislation should exist across all provinces and territories, and ideally, for all ages.
- Targeting research and advocacy to increase cycling, road safety, and helmet use in rural and remote areas.

For more information on these recommendations, see the CPS's 2024 position statement, "[Improving cycling safety for children and youth](#)".

Thank you for the opportunity to engage in this important and timely consultation for improving road safety in Newfoundland and Labrador. If the CPS can provide any additional information or resources to better protect the health and safety of children and youth, please do not hesitate to be in contact.

Sincerely,

Dr. Tricia Feener

Board Representative for Newfoundland and Labrador, CPS