



July 22, 2020

Port Transportation Association
administration@ptavancouver.com

Re: CTS Licence Application – Health and Safety Concerns

I am writing in response to your letter of July 20, 2020 asking that I put an immediate stop to the OBCCTC's licence application process – a process that is already well underway.

The purpose of the Office of the BC Container Trucking Commissioner's ("OBCCTC") 2020 licence application process is to further increase regulatory compliance and promote the efficiency, effectiveness and competitiveness of the container trucking industry, by requiring evidence of sound business practices, demonstrated fleet efficiency, and accurate record keeping and payroll processes.

After an extensive licensing consultation process, the OBCCTC issued its CTS Licence Reform 2020 – Consultation Report which detailed a number of key changes to the CTS Licence and the 2020 licensing process. Changes such as the minimum truck application requirement, were introduced in response to Port Transportation Association ("PTA") concerns.

Part of the process includes a reduction in the overall number of truck tags. The OBCCTC has set the truck tag target between 1450 and 1550. This was done in response to input from drivers, licensees and other industry participants who advised that the number of tags assigned to trucks exceeds the available work opportunities. This issue has, in part, contributed to past work stoppages and to past and present rate undercutting.

Despite extensive consultation and support for reform from driver representatives and current licensees, the PTA continues to oppose the 2020 licence application process and has raised new concerns in a series of letters, delivered well after the consultation period ended and the application process began. The PTA's recent correspondence includes a letter from its legal counsel and two letters sent on July 13, 2020 and July 17, 2020 that call into question my ethics. The July 13, 2020 letter was released to local media.

I have responded to all of the PTA's letters, including its letter from legal counsel. Detailed explanations about the purpose of the licence application package and further instructions have been provided as have assurances that the OBCCTC is required to and will treat PTA members' customer lists and other sensitive business information as confidential and will not disclose the same unless required by law.

Nevertheless, the PTA continues to contest the licence reform process. Of particular concern is the PTA's latest statement that licence reform will only serve to negatively impact drivers. This argument ignores the circumstances which precipitated the enactment of the *Container Trucking Act* (the "Act") and the creation of the OBCCTC. Moreover, it is certainly not a universally held belief among companies and drivers. I remain of the opinion that licence reform will have a long-term, positive impact on industry stability and the longer-term prospects of all drivers.

The circumstances surrounding COVID-19 are fluid and this office will respond as necessary in the event of a resurgence. I am not of the view that the possibility warrants suspending the 2020 license application process at this time.

OFFICE OF THE BC CONTAINER TRUCKING COMMISSIONER



Michael Crawford
Commissioner

cc Hon. Marc Garneau
Hon. Claire Trevena
Hon. Harry Bains
MLA Garry Begg
MLA Mr. Jagrup Brar
MLA Rachna Singh
MLA Ravi Kahlon
MLA Tracy Redies
MLA Jinny Sims