

Port Transportation Association



To the Attention of Michael Crawford
Office of the British Columbia Container Trucking Commissioner
1085 Cambie Street
Vancouver, BC V6B 5L7

October 7, 2021

RE: Company Tag Release & Access Request for Immediate Action

Mr. Crawford,

Please accept this letter as Port Transportation Association's follow up to the industry wide emails of the past few weeks regarding the current VFPA capacity issues.

The PTA has made our position that an increase in company truck tags is necessary quite clear, however after participating in today's stakeholder meeting kindly set up and hosted by CIFFA, we must once again state that an increase in company truck tags is going to be vital for the security of our supply chain.

We know that the Terminals will not change their practice of maximizing their gate efficiencies. Unfortunately, by doing this they cause a huge unrest in the community, carriers are just not equipped to return as much equipment as the terminals suggest in such a short window of time.

We are seeking the release of company tags so that the industry can over time attract, train and hire a younger more versatile group of drivers that will be replacing the aging work force.

We strongly feel that younger drivers will not want to take the risk and responsibility (both financially and mentally) to purchase emission and age compliant trucks to operate in the Ports.

Of those in attendance at the CIFFA meeting, the common conclusion was that this increase in volume at our Ports, off-dock facilities, warehouses and rail, etc., will not see relief for some time. There will be no immediate relief for any group within the supply chain, but we need to be proactively planning for the long term.

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For transparency and industry purposes, the PTA intends to distribute all content and post all meaningful dialogue on our website, to be viewed by both industry and the public.

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The PTA believes that for long term relief, the OBCCTC will need to make additional company truck tags available within the next thirty (30) days. Companies should be given notice of tag release, be eligible to apply in an easy and non-time consuming manner, and upon approval, given an appropriate period of time to hire a driver and source an appropriate unit based on the current equipment and employment market.

While there are currently I/O tags available and I/Os on the list, we maintain that there are reasons why these tags and drivers are not desirable and have yet to find a home. Some (not all) companies are willing to take on the financial risk to operate company owned equipment in order to ensure that they can secure and train the right driver(s) for long term retention.

The PTA believes that the additional tags will assist over the coming year, however the drayage industry is still facing the immediate issues of excessive FAS fees, terminal storage, demurrage costs. These costs are exploding and need to be reined in to ultimately protect the end consumers which will also help to keep our supply chain somewhat stable. At this time, we are calling on the OBCCTC to work with VFPA in allowing TLS companies to send non-tagged units into the Port in an effort to mitigate loss for the Canadian consumer.

The PTA understands that this request may create tension with some stakeholders, however we maintain that in order to properly clear the backlog of empty containers sitting in carriers' yards, keep Canadian Exports moving, and to pick up the growing container count sitting at Ports collecting charges, there must be some allowance for such temporary authorizations.

Outside of a Port standpoint, the temporary authorization of units will ease the stresses felt by drivers, dispatchers, and coordinators, who are working above and beyond the call of duty and keep the industry from seeing a mass exodus of good employees at a time where finding any workers is more difficult than usual.

By collecting the unit numbers, VINs, as well as the driver information prior to each occurrence of temporary authorization, the OBCCTC will still be able to verify all parties are properly paid at any future OBCCTC audits.

The unfortunate fact of the matter is that the addition of company tags and the allowance of non-tagged units on the basis of emergency authorization alone will not fix Vancouver's supply chain, this is a matter that requires active and cohesive response from all invested stakeholders.

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This urgent request for tags and unlicensed unit access, however, is a necessary solution to keep Canada's supply chain from experiencing a complete failure that would be detrimental to our economy.

We hope that both the OBCCTC seriously consider the health of Vancouver's drayage industry when reviewing these proposed ideas and would request a response no later than October 15, 2021.

Sincerely,

Port Transportation Association

CC:
Mr. Greg Rogge
Mr. Fred Moussette
TLS
GCT Canada
DP World