



February 26, 2020

Office of the BC Container Trucking Commissioner
1085 Cambie Street,
Vancouver, BC
V6B 5L7

Dear Office of the BC Container Trucking Commissioner,

On February 23rd, 2020, members of Pacific Caucus received a letter from the Port Transportation Association (PTA), who represent forty container trucking companies in British Columbia. In the letter, the PTA raised concerns with the implementation of the Office of the BC Trucking Commissioner's (OBCCTC) 2020 License Application Process and Tag Management Policy, Supplementary. The PTA and the companies they represent fear that they will no longer be able to operate their businesses under this policy.

The main concern surrounding the new Supplemental, introduced on February 11th, 2020, is that it removes smaller container trucking carriers – like the ones that PTA represents – from operating at the Ports of Vancouver.

This new policy will negatively impact companies who use the current CTC Truck Tag Policy, which as you know, currently permits two smaller companies to create tags together, to meet the minimum five tag requirement. Any company that does not meet the requirements under the new policy will not be eligible to re-apply for a new license and they will no longer be able to operate their business, leaving many in our communities unemployed.

The following points were stated by the PTA in their Feb. 11th letter, addressing areas that the new policy will impact for smaller companies:

1. “Smaller companies have a much larger per truck investment because most companies own their own equipment and their own trucks;
2. Companies have been working in the port industry for almost their entire life and will not be able to transition into another job;
3. Company equipment that is on lease will be of waste to the company;
4. All company employees will be laid off;
5. Companies will eventually go bankrupt;
6. Most land that is on lease is long term and cannot be withdrawn;
7. Most importantly, multiple livelihoods will be ruined.”

Under BC's Container Trucking Act, it is compulsory that all company trucks providing container trucking services be tagged. As Canada is built on Small and Medium Sized Businesses (SME), the higher tag targets proposed in the new policy essentially eliminates all small companies from competing. This is inherently discriminatory towards small businesses and fundamentally goes against Canada's commitment to fairness and equality.

While the BC Container Trucking Act is provincial, the Port of Vancouver falls under federal jurisdiction; which is why we, the Pacific Caucus are concerned that small businesses will not be able to access the Port. We are committed to



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ensuring small businesses can flourish. This can be seen throughout our federal government's initiatives with SME's, as well as in the CUSMA, which contains an entire chapter dedicated to small and medium sized businesses and their access to international markets.

The PTA is proposing a grandfather clause, that would protect smaller companies who have been operating for many years. They believe this would address many of the issues that companies have.

However, we believe that truck fleets of five or more (as is under the current policy) should be permitted to operate at our Ports. We also want to ensure that future entrepreneurs are not excluded from operating from the Port.

The new policy will negatively impact families and communities across BC. We hope that the Supplemental can be revisited and amended to reflect the importance of including small businesses and ensuring that they are able to actively participate in the industry.

Sincerely,

Terry Beech, M.P.

Burnaby North-Seymour

Chair of the Pacific Liberal Caucus

cc.

The Honourable Marc Garneau, Minister of Transportation

The Honourable Mary NG, Minister for Small Business, Export Promotion and International Trade

Prime Minister's Office