

February 7, 2020

Dear Mr. Crawford

I have been hauling containers to and from the port for over a decade. Along the way I have built great relationships with my customers. The *CTS Licence Reform – 2020 Licence Application Process and Tag Management Policy* will kill my livelihood.

This new proposal is intending to change the minimum tags from five truck tags to ten. That is a 100% increase from the last contract. Why is it being increased? Where has it been stated that five company tags are a problem?

Also, why are companies no longer able to apply as joint licences? From my point of view I see this as discrimination towards smaller carriers. The OBCCTC does not want small companies to operate at the Ports of Vancouver. If companies require a minimum of ten trucks and cannot “join hands” with other companies, it clearly shows the OBCCTC is not giving small companies a chance to operate at the port. In my research no other marine terminals in North America operate the way Vancouver does. As one of the busiest ports, Vancouver should be supporting small businesses, not stealing their livelihood from them.

It has also come to my attention this new policy requires “compliance history” as its additional requirements.

No Decision Issued: Good

Decision Issued No Penalty: Average

Decision Issued with Penalty: Poor

My company received a decision and a penalty- therefore, is in a “poor” position. Looking into the decisions posted online on the OBCCTC website many companies were required to complete a self-audit. The same companies required to complete the audit were all sent a decision by the commissioner, but only a few were given a penalty. Looking further into this situation I noticed that the commissioner decided not to issue a penalty to larger carriers. Companies such as: Prudential, Harbour Link, Columbia Containers, Unique Trucking. These are just a few companies who have owed a large sum to drivers, but did not receive a commissioner penalty. However, my company which only owed \$907.75 and received a penalty of \$1,500.00 while companies such as Harbour Link owed \$343,157.79 to its drivers the commissioner did not penalize these companies. I understand that these companies owed large amounts, and the commissioner maybe giving them a “break”. However, if this is the case, the OBCCTC should not be adding this as an additional requirement. Companies who owed a small sum, received a penalty, but companies who owed a large sum did not.

Overall, I find this new policy largely discriminatory towards smaller carriers. We hope the OBCCTC does not proceed with this new contact.

Regards,
Harinder Rattan
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