

Michael Crawford
Container Trucking Commissioner
1085 Cambie Street
Vancouver, British Columbia, V68 5L7

Re: 2020 Submissions for License Application Process and Tag Management Policy

Dear Mr. Crawford,

Thank you for the opportunity to provide feedback and present our concerns regarding the proposed changes to the CTS license reform. Aquatrans supports the Commissioner's mission to reduce the complexity of the Port Commissioner's audits in an effort to provide a transparent and fair marketplace.

Upon review of the CTS license reform, Aquatrans does express concerns regarding the following changes.

1. The increase of to a minimum of 10 TLS tags in order to conduct on-dock business.
2. The compliance history of prior licensees.

Truck Tag Increase

Aquatrans serves as a carrier for a multitude of customers in which we have built in depth relationships throughout our 30-year history. The proposal to move to a ten-tag minimum poses a serious threat to our business and although Aquatrans is confident in our business and carry the support of our customers, we do not see it fair to impose such a minimum. Aquatrans understands the need to reduce the overall amount of tags in the market due to congestion, however we believe smaller carriers who serve niche markets are not the underlying issue behind the port's congestion.

Suggestion: Aquatrans suggests that the truck minimum remain at 5 trucks. Business cases should still be presented following the guidelines of the Tag Evaluation Process in order to qualify for the requested amount of tags.

Compliance History

Under the new CTS license reform policy, past compliance is taken into consideration for the assignment of TLS tags. Aquatrans expresses some concern in the lack of criteria for new applicants and fear that they will gain an advantage as they will have no past infractions on their record. While Aquatrans is proud of their audit history, we have been subject to minor administrative penalties that may put us at a disadvantage when compared to a new applicant.

Suggestion: Aquatrans suggests that a grandfather clause be implemented to protect the TLS tags of a smaller company who has a long history of compliance. Companies who have demonstrated a high level of compliance over an extended period should be protected under the new CTS reform package. This will prevent tags from being stripped from compliant companies and awarded to new applicants who may violate the *Container Trucking Act*.



28 February 2020

Aquatrans appreciates the forum to share our questions and concerns and we hope our feedback is taken into consideration.

Sincerely,

Kyran Clarke
Operations Manager – Port & Agriculture Division
Aquatrans Distributors.