

Michael,

first off thank you for providing us with the opportunity to submit comment on the Off Dock Insights report recently shared with us and our west coast container membership. We recently had an opportunity to briefly discuss the report during a West Coast District Committee meeting last week.

There is broad concern being expressed by our container line membership about the general direction this report appears to be going. As much as this report doesn't make specific conclusions it appears to be headed down the path of including all off-dock moves under the auspices of the OBCCTC and subsequent further regulation of driver compensation.

As the report notes, local trucking moves are growing at a slower pace than the overall growth in the containers business. I believe it is safe to assume at least some of this dampening of growth is due to the general cost of trucking and unintended consequences of previous changes (PMR as an example) which continue to add costs to drayage moves in the gateway. It is our view that further cost increases will continue to exacerbate these trends in local trucking. I'm sure you understand all users in the gateway are looking for ways to reduce costs particularly during these extraordinary times.

We fully understand the history of the drayage business in Vancouver and the challenges experienced on numerous occasions in the past. The Shipping Federation of Canada strongly supports healthy competition in all areas of the supply chain believing that this leads to the best and more efficient service and price outcomes.

These are some preliminary thoughts expressed by our membership and we look forward to an opportunity to discuss and hear your thoughts on the next steps outlined in the report.

Regards,

Scott Galloway
Director Strategic Initiatives
Shipping Federation of Canada
300-1055 West Hastings Street
Vancouver, BC V6E 2E9