

October 16, 2020

Via email only

Office of the British Columbia Container Trucking Commission 1085 Cambie St, Vancouver, BC V6B 5L7

Attention: Registrar

## Re: Request for Feedback on Off-Dock Insights Report

Thank you for the opportunity to provide feedback concerning the Off-Dock Drayage Insights Report.

Teamsters Local Union No. 31 represents workers in numerous transport and warehousing companies that deal routinely with the off-dock drayage issues raised in the Commission's report.

The Teamsters' experience is that wages and working conditions are better in unionized companies and that unionized workers are protected from some of the exploitative tactics of Employers. However, the increase in smaller, unlicensed drayage companies in the sector has presented a challenge to the unions working in the sector, as these smaller "fly by night" drayage companies can be more difficult to organize, and it is also very hard to monitor the rates of pay for these drivers.

In light of this, the Teamsters are in favour of policies that would encourage the bigger, established off-dock operations to develop their own in-house drayage capacities, whether in the form of company drivers or dependent operators. These established companies are more permanent fixtures in the sector and are more professional in their approaches to business and to labour relations, which benefits workers and customers alike.

In listening to our members, the Teamsters have also identified a few additional issues that impact the efficiency of port-related drayage:

## **Management of Empty Containers**

One area that comes up repeatedly is the inefficiencies and delays related to the handling of empty containers. Currently, shipping companies advise off-dock drayage companies of release

numbers for available empties, but these are provided on a first-come, first-served basis. This practice frequently results in wasted trips where drivers arrive to pick up empties only to find that the shipper has already given them away to other drivers. This could be avoided or reduced by a regulation requiring shippers to keep track of both their stock of empties and the number of expected pick-ups, so that they would be less likely to over-promise booking numbers to drivers looking for empties.

## Hourly Pay vs. Trip Pay

Our members are generally in favour of hourly pay as opposed to trip pay. Drivers paid by the trip are heavily dependent upon efficient and fair dispatch. Efficiency of dispatch is discussed in your report, but our members also report issues of fairness in dispatch at trip-pay employers. The dependence on dispatch means that companies are able to use dispatch as a tool for favouritism and reprisals, by giving more work to favourites and less to drivers that the employer doesn't like. Unfairness in dispatch is very difficult to prove and thus hard for unions or individual workers to fight against. In contrast, hourly drivers are not nearly as vulnerable to reprisals through dispatch.

I hope that this feedback is useful to the Commission. The Teamsters are committed to having our members' voices heard in this process and are happy to participate in discussions regarding the future of off-dock container trucking.

Yours truly,

Stan Hennessy President

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