



CHAMBER OF SHIPPING

August 31, 2021

Mr. Michael Crawford
Office of the BC Container Trucking Commissioner
1085 Cambie Street
Vancouver, BC V6B 5L7
Email: Registrar@obcctc.ca

Dear Mr. Crawford,

Thank you for the opportunity to submit our comments with respect to the *Off-Dock Drayage Reform CTS Licence and Rate Order Amendments*.

The Chamber of Shipping represents the majority of ocean carriers and their agents engaged in the international shipping in Western Canada. The marine transportation sector is vital to supporting trade and Canada's continued prosperity depends on our ability to deliver resources, goods, and people in a responsible and competitive manner.

We have reviewed the report in detail and wish to advise that one of the recommendations is of serious concern to ocean carriers who directly contract the drayage of both loaded and empty containers in the Greater Vancouver Regional District and beyond. *Recommendation 5 - Amend the Rate Order to eliminate trip rates and the Positioning Movement Rate ("PMR") and introduce comparable minimum hourly rates for all employees and Independent Operators* is not supported by ocean carriers. The "per trip" rate model allows for a consistent rate application and understanding of the costs to move a container from point A. to B. An hourly rate model could result in significant cost fluctuations and over-runs which would be challenging to recover.

We recommend that a further review is undertaken with key stakeholders on the "per trip" model and that rates are set that allow for a competitive environment along with a fair market compensation to all employees and independent operators.

Please do not hesitate to reach out to the Chamber if further information or discussion is required. We would also be happy to facilitate a meeting with our members to understand their concerns directly.

Sincerely,

Robert Lewis-Manning, OMM, CD, MBA
President
Chamber of Shipping