



TEAMSTERS LOCAL UNION No. 31

AFFILIATED WITH TEAMSTERS CANADA AND THE INTERNATIONAL BROTHERHOOD OF TEAMSTERS
#1 GROSVENOR SQUARE, DELTA, BC V3M 5S1



August 23, 2021

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 Implementation of the May 2021 Off-Dock Insights Report

Thank you for the opportunity to provide feedback concerning the recommendations in the Minister's Report on off-dock drayage.

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

Some of the Report's recommendations concerning licensing fees, licensee security deposits and OBCCTC funding are mostly outside of the Union's role in representing workers in this field, so we have no feedback on those recommendations at this time. The Union's feedback on the other recommendations is set out below.

Application of CTS License to Affiliated Drivers and Mandated Hourly Rates

The Teamsters are pleased to see that the Report recommends mandating an hourly rate of pay for all port-affiliated drivers. We believe that this will promote fairness and efficiency in dispatch, will encourage employers to minimize the wait times that drivers face, and will make it easier to determine whether companies are complying with the regulated minimum rates of pay for their drivers.

Concerning the calculation of the hourly rate, the Teamsters recommend that the cost of fuel be dealt with in a separate surcharge amount, in order to respond to fluctuations in the price of fuel.

Electronic Logging Devices

We are also in favour of the Report's recommendation that licensees and their affiliates be required to install certified electronic logging devices on trucks. Beyond making it easier for the OBCCTC to ensure compliance, the information from these devices could assist companies to

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monitor and fine tune their dispatch process, especially for tasks that are currently inefficiently dispatched, such as moving empty containers.

The Teamsters are committed to having our members' voices heard in this process and we look forward to participating in any future discussions regarding off-dock container trucking.

Yours truly,

A handwritten signature in black ink that reads "Stan Hennessy". The signature is written in a cursive, flowing style.

Stan Hennessy
President

SH:sep 