



November 29, 2021

Unlicensed, Untagged Off-Dock Drayage Activity

The Office of the BC Container Trucking Commissioner (“OBCCTC”) recently published the [Off-Dock Drayage Reform Consultation Report](#) and is now following up with a bulletin to remind trucking companies of the existing requirements of the *Container Trucking Act* (the “Act”) and to provide information about future changes to the CTS Licence which will prohibited licensees from using unlicensed, untagged off-dock container trucking service providers.

What is allowed

Only companies that have a CTS Licence can perform container trucking services. Both on and off-dock container trucking services are to be completed using tagged trucks. Licensees must pay truck drivers the Commissioner’s rates for both on and off dock container trucking services.

What is not allowed

Companies that do not hold a CTS Licence are not allowed to perform container trucking services. Licensees are not allowed to conduct untagged off-dock container trucking services.

Enforcement

Licensees that use untagged trucks to perform off-dock container trucking services will be penalized.

Section 42 of the *Act* makes it an offence to perform container trucking services without a CTS Licence. This offence is enforced in accordance with the provisions of the *Offence Act*. Evidence of unlicensed companies performing off-dock container trucking services will be investigated by the OBCCTC and unlicensed companies that perform container trucking services may be reported to the police.

2022 CTS Licence

CTS Licence amendments will be introduced at the start of the next licensing period in Spring 2022 that will make it a violation of the CTS Licence for licensees to use unlicensed affiliated companies and untagged trucks to conduct container trucking services. It will also be a violation of the CTS Licence for licensees to contract with unlicensed companies for the provision of off-dock container trucking services. Licence violations are subject to the available penalties under the *Act* which include financial penalties up to \$500,000.00, licence suspension and licence cancellation.

Sincerely,

OFFICE OF THE BC CONTAINER TRUCKING COMMISSIONER

Michael Crawford
Commissioner