



OFFICE OF THE
BRITISH COLUMBIA CONTAINER
TRUCKING COMMISSIONER

Rate Review Consultation Report

April, 2023



OFFICE OF THE BRITISH COLUMBIA CONTAINER TRUCKING COMMISSIONER

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Executive Summary

The BC government tasked the Container Trucking Commissioner (the “Commissioner”) with setting future rates and fuel surcharges. It is nearing ten years since the labour unrest which led to the signing of the Joint Action Plan, the introduction of the *Container Trucking Act (the “Act”)*, *Container Trucking Regulation (the “Regulation”)* and the formation of the Office of the BC Container Trucking Commissioner (“OBCCTC”). Since 2014, government reform measures and actions taken by the OBCCTC have assisted in advancing the industry beyond many of the issues that were inherent in 2014.

An independent third party (Cascadia Partners) was engaged to examine the issue in detail to inform the question of future rate increases and they produced a Trucking Compensation Study. The Commissioner consulted with Industry Stakeholders and published a Rate Review Recommendation Report on February 2, 2023 (“Recommendation Report”).

In the Recommendation Report, the Commissioner made 5 different proposals to rate changes for drivers in the Lower Mainland drayage sector and invited the stakeholders to provide their comments and feedback through written submissions.

The Commissioner is tasked with ensuring fair and equitable rates for drivers to support a stable, efficient and competitive sector. Ensuring stability and fair remuneration is one of the primary concerns to the OBCCTC.

Based on the submissions received and the reasons set out in the Recommendation Report and the Consultation Report, the Commissioner has decided to adopt some proposals as is, while make amendments to others. More information is detailed in this report.

ਕਾਰਜਕਾਰੀ ਸੰਖੇਪ ਵਿਚ

ਬੀ ਸੀ ਸਰਕਾਰ ਨੇ ਕੰਟੇਨਰ ਟਰੱਕਿੰਗ ਕਮਿਸ਼ਨਰ ("ਕਮਿਸ਼ਨਰ") ਨੂੰ ਭਵਿੱਖੀ ਰੇਟ ਅਤੇ ਫਿਯੂਲ ਸਰਚਾਰਜ ਨਿਰਧਾਰਤ ਕਰਨ ਦਾ ਕੰਮ ਸੌਂਪਿਆ ਹੈ। ਮਜ਼ਦੂਰ ਅਸ਼ਾਂਤੀ ਨੂੰ ਲਗਭਗ ਦਸ ਸਾਲ ਹੋ ਗਏ ਹਨ ਜਿਸ ਕਾਰਨ ਸਾਂਝੀ ਕਾਰਜ ਯੋਜਨਾ 'ਤੇ ਹਸਤਾਖਰ ਕੀਤੇ ਗਏ, *ਕੰਟੇਨਰ ਟਰੱਕਿੰਗ ਐਕਟ ("ਐਕਟ")*, *ਕੰਟੇਨਰ ਟਰੱਕਿੰਗ ਰੈਗੂਲੇਸ਼ਨ ("ਰੈਗੂਲੇਸ਼ਨ")* ਅਤੇ ਆਫ਼ਿਸ ਆਫ਼ ਦੀ ਬੀ ਸੀ ਕੰਟੇਨਰ ਟਰੱਕਿੰਗ ਕਮਿਸ਼ਨਰ ("ਓ ਬੀ ਸੀ ਸੀ ਟੀ ਸੀ") ਦੇ ਗਠਨ ਦੀ ਸ਼ੁਰੂਆਤ ਹੋਈ। 2014 ਤੋਂ, ਸਰਕਾਰੀ ਸੁਧਾਰ ਉਪਾਵਾਂ ਅਤੇ ਓ ਬੀ ਸੀ ਸੀ ਟੀ ਸੀ ਦੁਆਰਾ ਕੀਤੀਆਂ ਗਈਆਂ ਕਾਰਵਾਈਆਂ ਨੇ ਉਦਯੋਗ ਨੂੰ 2014 ਵਿੱਚ ਮੌਜੂਦ ਬਹੁਤ ਸਾਰੇ ਮੁੱਦਿਆਂ ਤੋਂ ਅੱਗੇ ਵਧਾਉਣ ਵਿੱਚ ਸਹਾਇਤਾ ਕੀਤੀ ਹੈ।

ਇੱਕ ਸੁਤੰਤਰ ਤੀਜੀ ਧਿਰ (ਕੈਸਕੇਡੀਆ ਪਾਰਟਨਰਜ਼) ਨੇ ਇਸ ਮੁੱਦੇ ਦੀ ਵਿਸਤਾਰ ਵਿੱਚ ਜਾਂਚ ਕੀਤੀ ਅਤੇ ਰੇਟ ਵਿੱਚ ਵਾਧੇ ਦੇ ਸਵਾਲ ਨੂੰ ਸੂਚਿਤ ਕਰਨ ਲਈ ਅਤੇ ਉਹਨਾਂ ਨੇ ਇੱਕ ਟ੍ਰੱਕਿੰਗ ਕੋਮਪੋਸੇਸ਼ਨ ਸਟੱਡੀ ਤਿਆਰ ਕੀਤੀ। ਕਮਿਸ਼ਨਰ ਨੇ ਉਸ ਰਿਪੋਰਟ 'ਤੇ ਇੰਡਸਟਰੀ ਸਟੇਕਹੋਲਡਰਾਂ ਨਾਲ ਵਿਚਾਰ-ਵਟਾਂਦਰਾ ਕੀਤਾ ਅਤੇ 2 ਫਰਵਰੀ, 2023 ਨੂੰ ਰੇਟ ਰਿਵਿਊ ਰੈੱਕਮੈਨਡੇਸ਼ਨ ਰਿਪੋਰਟ ਪ੍ਰਕਾਸ਼ਿਤ ਕੀਤੀ ("ਰੈੱਕਮੈਨਡੇਸ਼ਨ ਰਿਪੋਰਟ")।

ਰੈੱਕਮੈਨਡੇਸ਼ਨ ਰਿਪੋਰਟ ਵਿੱਚ ਕਮਿਸ਼ਨਰ ਨੇ ਲੇਅਰ ਮੈਨਲੈਂਡ ਡਰੇਜ਼ ਸੈਕਟਰ ਵਿੱਚ ਡਰਾਈਵਰਾਂ ਦੇ ਰੇਟਜ਼ ਦੇ ਬਦਲਾਵਾਂ ਲਈ 5 ਵੱਖ-ਵੱਖ ਪ੍ਰਸਤਾਵ ਬਣਾਏ ਅਤੇ ਸਟੇਕਹੋਲਡਰਾਂ ਨੂੰ ਲਿਖਤੀ ਬੇਨਤੀਆਂ ਰਾਹੀਂ ਪ੍ਰਸਤਾਵਾਂ 'ਤੇ ਆਪਣੀਆਂ ਟਿੱਪਣੀਆਂ ਅਤੇ ਫੀਡਬੈਕ ਪ੍ਰਦਾਨ ਕਰਨ ਲਈ ਸੱਦਾ ਦਿੱਤਾ।

ਕਮਿਸ਼ਨਰ ਨੂੰ ਡਰਾਈਵਰਾਂ ਲਈ ਨਿਰਪੱਖ ਅਤੇ ਬਰਾਬਰ ਰੇਟਜ਼ ਨੂੰ ਯਕੀਨੀ ਬਣਾਉਣ ਦਾ ਕੰਮ ਸੌਂਪਿਆ ਗਿਆ ਹੈ ਤਾਂ ਜੋ ਇਹ ਖੇਤਰ ਇੱਕ ਸਥਿਰ, ਕੁਸ਼ਲ ਅਤੇ ਪ੍ਰਤੀਯੋਗੀ ਖੇਤਰ ਰਹੇ। ਸਥਿਰਤਾ ਅਤੇ ਨਿਰਪੱਖ ਮਿਹਨਤਾਂ ਨੂੰ ਯਕੀਨੀ ਬਣਾਉਣਾ ਓ ਬੀ ਸੀ ਸੀ ਟੀ ਸੀ ਦੇ ਆਫ਼ਿਸ ਲਈ ਮੁੱਖ ਕੰਮਾਂ ਵਿੱਚੋਂ ਇੱਕ ਹੈ।

ਪ੍ਰਾਪਤ ਹੋਈਆਂ ਬੇਨਤੀਆਂ ਅਤੇ ਰੈੱਕਮੈਨਡੇਸ਼ਨ ਰਿਪੋਰਟ ਵਿੱਚ ਦਰਸਾਏ ਕਾਰਨਾਂ ਦੇ ਆਧਾਰ 'ਤੇ, ਕਮਿਸ਼ਨਰ ਨੇ ਕੁਝ ਪ੍ਰਸਤਾਵਾਂ ਨੂੰ ਜਿਵੇਂ ਕਿ ਉਹ ਸਨ ਰੱਖਿਆ, ਜਦਕਿ ਬਾਕੀਆਂ ਵਿੱਚ ਸੋਧਾਂ ਕੀਤੀਆਂ ਹਨ। ਇਸ ਬਾਰੇ ਹੋਰ ਜਾਣਕਾਰੀ ਇਸ ਰਿਪੋਰਟ ਵਿੱਚ ਦਿੱਤੀ ਗਈ ਹੈ।

Introduction

The Office of the BC Container Trucking Commissioner (“OBCCTC”) published a Rate Review Recommendation Report on February 2, 2023 (“Recommendation Report”) summarizing proposals to rate changes for drivers in the Lower Mainland drayage sector. Stakeholders were asked to provide their comments on the proposals through written submission. The information received from stakeholders is detailed in this report.

The proposals focused on the following topics:

1. Inflation adjustment and wage gap correction to the minimum hourly rate for directly employed drivers (“Company Drivers”) and indirectly employed operators (“IEOs”);
2. Establishing a new rate modelled on the Employment Standard’s Act short haul calculation for Company Drivers and IEO’s who work more than 9 hours a day or 45 hours a week.
3. Inflation adjustment for independent operators (IO’s) to be applied to the hourly rates, trip rates and minimum call out rates.
4. Annual minimum rates increase for trip rates, hourly rates and minimum call out rates based on the previous year’s annual average BC Consumer Price Index with a mandatory comprehensive rate review every four years.
5. Review the PMR and Fuel Surcharge with the Industry Advisory Committee to ensure they are covering unexpected costs.

The proposals were generally understood by stakeholders but not surprisingly, the question of the appropriateness of the correct remuneration was contentious. While there was support for some of the proposals, other proposals – particularly the rate increases - were characterized as appropriative or either not going far enough or going too far. Included in some stakeholder submissions was data that they say directly challenged some of the empirical findings in the Cascadia Partners Trucking Compensation Study (the “Cascadia Study”). Other submissions challenged the authority of the Commissioner to enact some of the proposals. Questions were also that were raised will be addressed in this consultation report.

Based on the reasons set out in the Recommendation Report and this Consultation Report, the OBCCTC will be adopting the following proposals:

- Proposal 1 – Inflation and wage correction for Company Drivers and IEOs
- Proposal 3 – Inflation adjustment for IO’s in 2023
- Proposal 5 – Refer PMR and Fuel Surcharge to Industry Advisory Committee

The OBCCTC will adopt the following proposals with amendments:

- Proposal 2 – Overtime Rate for Company Drivers
- Proposal 4 – Annual Increases and 4-year comprehensive review

Consultation Process

The Office of the BC Container Trucking Commissioner's ("OBCCTC") 2018 Container Trucking Regulations Part 4 (Rates and Renumeration) Recommendation Report made a series of recommendations that resulted in increases to the hourly rates for Company Drivers and IOs, modification of the fuel surcharge formula, and changes to the trip rates.

In 2019, the Container Trucking Commissioner (the "Commissioner") was given the authority to set future rates and fuel surcharges.

On April 28, 2022, the OBCCTC committed to utilizing third party resources to inform the question of future rate increases. As part of that commitment, the OBCCTC tasked Cascadia Partners ("Cascadia") to produce a Trucking Compensation Study to assist the Commissioner in considering future rate increases. The study was to include:

- Analysis of the variability in driver compensation in the Lower Mainland;
- Comparison to drayage compensation and conditions in other port jurisdictions including Montreal, Seattle, Prince Rupert and Los Angeles/Long Beach; and
- Comparison of driver compensation for drayage to other heavy-duty trucking roles in British Columbia.

Stakeholders in the drayage sector were invited to be interviewed by Cascadia. Over 40 interviews were conducted, including interviews with drivers, trucking company officials, union representatives and industry associations.

On September 7, 2022, I was appointed as the new Commissioner and began a series of meetings with stakeholders in the drayage sector. I also undertook a review of several of the issues surrounding remuneration and looked at previous Commissioner Reports and OBCCTC decisions.

On December 1, 2022, Cascadia presented its finding to the OBCCTC in its Cascadia Study.

On February 2, 2023, the OBCCTC published a Rate Review Recommendation Report on February 2, 2023 summarizing proposals to rate changes for drivers in the Lower Mainland drayage sector. Stakeholders were asked to provide their comments on the proposals through written submissions. The written submissions received are published on the OBCCTC website.

While I have considered all the written submissions, I have only highlighted key issues raised in the submissions necessary to explain my decisions.

Purpose of the Container Trucking Act and Container Trucking Regulation

Before considering specific issues raised in response to the proposals, it is important to consider the regulatory scheme in a wider context to ensure that it is adequately addressing the issues which led to its creation in 2014. The regulatory scheme was introduced in response to work stoppages by container truck drivers at marine terminals and was intended to regulate the transportation of marine containers that transit through Port of Vancouver container terminals by truck. More specifically, the regulatory scheme was created to preserve stability in the drayage sector by addressing chronic rate undercutting and driver compensation issues through a system of minimum rates, audits, licensing, and enforcement.¹

Consultation Response

Proposal 1 – Inflation and wage correction for Company Drivers and IEOs

Proposal 3 – Inflation adjustment for IOs in 2023

Most submissions did not seriously challenge the Cascadia Study’s finding that the hourly rates for Company Drivers and IEOs have not kept up with the cost of living or with increases provided to independent operators. While most submissions did not individually address the proposed trip rate increases for IO, they spoke generally about the impacts of the increase in the trip rates.

Many Company Driver submissions spoke about the day-to-day economic challenges they face due to increased costs, and some urged the Commissioner to increase the rate closer to the hourly rate of \$37.00 seen in Seattle and Los Angeles. Some Company Driver’s provided evidence that drivers in similar industries were being recruited at a much higher rate than the current minimum rate.

One union submission urged the Commissioner to match the Company Driver rate to the 20.5% increase in inflation since the first rate was created in 2015. It also suggests such an increase is necessary when considering Canadian Centre for Policy Alternatives study shows the cost of living in metro Vancouver has increased 17.3% between 2021 and 2022.

¹ *Can. American Enterprises Ltd. v. British Columbia Container Trucking Commissioner*, 2020 BCSC 2156 at para. 10.

One employee association supported the introduction of a wage correction but thought spreading the increase over three years was too long and argued for an increase over two years to address the historic inequity of the Company Driver Rate compared to the increases to IO's.

Some individual licensees acknowledged that inflation has impacted the drayage sector, however they assert that increasing wages – thus increasing costs – will only exacerbate the inflation rate.

One licensee association suggests that there is not a significant wage gap between Company Drivers and IO's when factoring in other payroll costs that accompany the hiring of Company Drivers (e.g., Employment Insurance and Canadian Pension Plan premiums, vacation pay, workers compensation contributions, benefits). They argue the additional licensee costs exclusively associated with hiring Company Drivers already closes the hourly wage gap between Company Drivers and IOs. Based on its estimation, the proposed rate of \$31.68 per hour would equate a cost to the licensee of \$40.24 per hour when factoring in statutory payments. They argue that the additional \$8.57 per hour in costs would create a significant competitive advantage for licensees who employ IOs and would destabilize the drayage sector as licensees would have to absorb the additional cost by November 30, 2024.

Other licensee submissions argue that the current driver rates are not a barrier to recruitment in the drayage sector as noted in the Cascadia Study and it is not appropriate to raise the minimum rate as it may have the unintended effect of drawing more drivers from other sectors of economy. Rather than adjusting the rate based on the Cascadia Study, one licensee association argues that the wage rate should be proposed based on the traditional employer approach that goes into considering a proper wage rate – mainly those factor that support recruitment, retention, and wage consistency within their organization.

I appreciate all the submissions related to setting the minimum rates for Company Drivers and IEOs. As was stated in the Recommendation Report, one of the guiding principles in setting the minimum rate is to be consistent with the purpose of the *Act* and the *Regulation*.

The thrust of proposal #1 was to address the growing wage gap between Company Drivers and IEOs and IOs and the concern that this was causing instability in the industry. Wage disparity and the ability to earn an appropriate income were key factors that led to the destabilization in the drayage sector.

While I appreciate that some submissions suggest that the minimum rate for Company Drivers and IEOs should be higher based the fact the proposed rate does not immediately take into consideration the cumulative loss in wages since 2015 or the a sampling of other rates offered by other employers, it must be remembered that the Commissioner sets the minimum rate and that rate should be set in accordance with the purpose of the *Act*. The proposed minimum rate for Company Drivers and IEOs was developed to ensure that the minimum rate retained its purchasing power, closed the gap the IOs, and set a path

forward to ensure the gap does not return and licensees can plan for future minimum rate increases. I am not persuaded that increasing the proposed minimum rate closer similar professions in the Lower Mainland or to the \$37.11 hourly rates for container truck drivers in Seattle and Los Angeles, and it must be remembered that the regulated minimum rates have been below the rates in those jurisdictions and have brought stability to the industry. I also recognize some submissions suggested the “elevator” adjustment increases over three years was too long and should be shortened or eliminated, I am alive to the fact that an immediate wage correction would be a significant increase to licensees that I am not confident could be immediately absorbed without creating some instability.

In terms of the licensees and their associations concerns that the Cascadia Study methodology does not take into consideration certain local economic realities and introduces irrelevant comparison indicators, I am not persuaded that the submissions have made out a strong argument to deviate from the proposals. I acknowledge that some of the licensees disputed the wage comparators in the Cascadia Study - particularly the inclusion of Seattle and Los Angeles – and urged me to not rely on these comparators due to different tax structures, different costs of living, different benefit entitlements or just outright irrelevant. Other than mere assertions that the jurisdictions are different, I was provided no analysis or evidence why the Cascadia Study data is flawed in its comparisons between each port and the Vancouver drayage sector.

The Cascadia Study acknowledges some of the cost-of-living differences between the port jurisdictions but provides a historical analysis that shows that the Lower Mainland has been historically compensated between the rates found in Montreal, Seattle, and Los Angeles. I will note that the current minimum rate in Vancouver is nearly \$9.00 an hour less than the rates found in Seattle and Los Angeles. The proposed minimum rate in 2023 is still estimated to be nearly \$5.00 an hour less than in Seattle and Los Angeles. I was provided no empirical evidence to support the assertion that the proposed minimum rate would see Vancouver leap to the front of other jurisdictions in terms of compensation when comparing each jurisdiction’s cost of living, tax structures, or benefit entitlements.

It is unclear to me why the estimated proposed minimum rate of \$31.67 per hour in 2023 is excessive or puts the licensees at a competitive disadvantage. In 2015 – the implementation of the first minimum rate for the Company Drivers – the *Regulation* set the rate at \$25.13 per hour. If the 2015 rate was adjusted for inflation based on the BC CPI each year it would have been at \$30.48 per hour in 2022. However, the minimum regulated rate in 2022 was \$28.88 per hour – \$1.60 per hour less the cost-of-living rate. Given the estimated inflation rate in 2023, it appears that the proposed 2023 minimum rate of \$31.67 for Company Drivers and IEO is close to on par with the hourly rate set in 2015 when adjusting for inflation. I find that the proposed rate for Company Drivers is close to par with the rate set in 2015 and achieves a similar objective today of maintaining stability in the industry while allowing the drayage sector to remain competitive. I fail to see how a proposed rate comparable in real dollars to the one set in 2015 that has established stability in the drayage sector would now bring about instability.

Regarding the suggestion that there is no material wage gap correction required for Company Drivers when factoring in the additional costs for entitlements and benefits enjoyed exclusively by Company Drivers, I am unclear on what basis the licensee association asserts that these costs are not borne by those licensees who hire independent operators. Where benefits meet the definition set out in the *Regulation*, they are included in the composition of the minimum rates – regardless of whether the driver is a Company Driver or an IO. The *Act* and *Regulation* do not (and cannot) exempt IOs from certain entitlements or licensees from contributing funds on their behalf. One licensee – in its response to overtime for IOs – suggests that IOs are truly employees when viewed through the jurisprudence lens. Each of those statutory agencies will determine whether an IO qualifies for certain entitlements or a licensee needs to remit certain funds on the IOs' behalf and it is not clear to me that it has been determined that licensees who employ IOs are exempt from those entitlements for Company Drivers.

Finally, I did not find specific disagreement in the submissions with increasing the trip rates in 2023. I outlined in the Recommendation Report that the Fuel Surcharge and the Position Movement Rate have shielded IOs from certain cost increases, but those two rates are meant to cover additional costs of running IO vehicles – not replace the need for an appropriate wage rate. In addition, the published trip rates have made it difficult for licensees to negotiate the true cost of shipping containers around the Lower Mainland.

I am tasked with ensuring fair and equitable conditions that support a stable, efficient, and competitive drayage sector. While I appreciate that some submissions suggested the rates do not meet the immediate needs of drivers facing increasing costs and other submissions suggest that the rates are unaffordable and unnecessary, I am of the view based on the foregoing reasons that proposal #1 and proposal #3 be adopted and implemented starting July 1, 2023.

Proposal 2 – Overtime

Overtime rate based on Employment Standards Regulation for Short Haul Driver for company and IEO drivers who work more than 9 hours a day or 45 hours a week.

While there was support for the introduction of overtime for Company Drivers, there were some jurisdictional challenges and equity arguments raised by various licensees and licensee organizations.

The first challenge was a jurisdictional challenge. Some licensees argue that trucking is a federally regulated entity and therefore the Commissioner is no able to set rates for overtime. Other than an assertion, the licensees provide no evidence to support their position that the Commissioner has now jurisdiction to set a new rate for overtime.

In *Aheer Transportation Ltd. v Office of the British Columbia Container Trucking Commissioner*, 2017 BCSC 1111, the Court noted:

The business of moving containers to and from ports and between storage locations is known as the drayage industry. It involves areas of both federal and provincial jurisdiction and regulation” (para 10.)

I find that while certain aspects of a licensee’s business may fall under federal jurisdiction, most of the licensees and the drivers are located and mostly operate within the boundaries of the province of British Columbia and therefore are subject to provincial jurisdiction covered by the *Act* and *Regulation*. Under Section 22 of the *Act*, I find the Commissioner is empowered to establish a new rate based on the number of hours worked on a daily and weekly basis.

The second challenge raised by many stakeholders is the exclusion of IOs from the new rate for overtime. Having different rates for different types of drivers is not unique in the *Regulation*. A current rate example would be the exclusive application of the Position Movement Rate (“PMR”) to IOs who are paid in accordance with the regulated trip rates. However, several submissions suggest that applying overtime to only Company Drivers would create a competitive advantage for those licensees who use IO’s and deny an IO an entitlement to overtime.

The difficulty in setting a rate is not determining whether an IO working more than 9 hours should be recognized with overtime. IOs may already be entitled to overtime if they fall under the appropriate definition set out in the Employment Standards Act and those licensees who fail to pay overtime are vulnerable to penalties and recovery amounts set by through that legislation. One licensee submission sets out the correct standard – in my opinion – of what is a common test by the courts for determining who is an employee. I was provided no evidence that IOs are currently exempt from the requirements of overtime under the Employment Standards Act.

The challenge is coming up with an overtime rate for IOs is based on a trip rate compensation model. I note earlier attempts to move to an hourly model of payment for IOs was suggested and rejected in earlier Commissioner Reports. Unfortunately, if the hourly rate had been adopted, it may have made the process easier to establish and overtime rate. However, with the trip rate being paid regardless of the hours worked by the IO, it is difficult to establish how an overtime rate would be calculated.

While many of the submissions supported the imposition of an overtime rate for IOs, many did not specify how a rate should be created. One labour organization presented a novel approach to determine an overtime rate structure for IOs that I think has some merit. I will provide the sector a supplementary recommendation on the establishment of an IO overtime rate and seek submissions on that narrow issue. This should address whether such a calculation would work and any inequity arguments.

The new rate for Company Drivers working in excess of 9 hours a day and 45 hours a week will proceed effective May 1, 2023 and I will propose a separate rate for IOs and seek feedback no later than April 21, 2023.

Proposal 4 – Annual Increases and 4-year comprehensive review

Introduce annual hourly and trip rate and minimum call out increases on July 1 of each year tied to BC Consumer Price Index with a mandatory four-year comprehensive rate review.

The essence of this proposal was to ensure that licensees in the drayage sector would be provided certainty of increases to the minimum rate and ensure that Company Driver wages would no longer need rapid wage adjustments following delays in increases. To ensure that the wage increases reflected the economic reality of licensees and the drivers, it was proposed that a review be conducted every four years to adjust the wage rates.

Most of the submissions endorsed the importance of certainty regarding wage adjustments for both drivers and licensees.

Some submissions supported tying future minimum rate increases to the rate of inflation. Many drivers argued automatic minimum rate increase were necessary to avoid a further erosion of the minimum rates as costs are not easily recovered following years of delayed increases.

Other submissions disagreed the rate should be tied to the rate of inflation as the automatic increases may not reflect the reality facing the drayage sector. One licensee association argues more weight should be placed on local market conditions and economic realities when determining wage rate increases. They argue that tying the minimum rate to the rate of inflation creates automatic increases that would not take into consideration the short term increases and decreases on container volume. Furthermore, it would supplant the collective bargaining process which typically takes into consideration the realities facing employers and the ability to pay when negotiating a wage increase.

Almost universally, many felt that the proposed comprehensive wage rate review every four years was too long. Those that made alternative proposals thought a 2 to 3 year review was more reasonable.

The minimum rate is the rate set to ensure stability in the drayage sector. The Cascadia Study shows a history of zero to 10 per cent increases year over year. Such dramatic swings in rate increases followed by rate reviews processes in and of itself are not conducive to establish a stable drayage sector. I am not persuaded that abandoning automatic minimum rate increases tied to inflation can be replaced by

another real time wage adjustment that ensures ongoing stability in wages. Given the monetary policy goals to maintain inflation around 2 percent a year, tying the minimum rate to inflation would mean more steady and predictable rate increases.

In terms of the minimum rate increases' impact on collective bargaining, I fail to see how automatic increases to the minimum rates would have any unique impact in the bargaining process. Collective bargaining deals with a variety of workplace issues – not just exclusively wages. While some employers and workers may be satisfied with inflation adjustments, they are not prohibited from seeking further wage increases. I note the provincial government currently raises the minimum wage every year and imposes minimum terms like sick days and the impact on collective bargaining would have the same impact.

I have sympathy for a more just-in-time economic review to ensure we are on the right track when it comes to wages. However, the reality is that those reviews historically take time and delay any necessary wage corrections to ensure continuing stability. This is why I proposed a 4 year review to provide an opportunity to realign the wage rates if they strayed from their intended purpose.

After reviewing the submissions, I believe adjusting the minimum rates based on the formula used to adjust the minimum wage in BC is an appropriate step to ensure continuing stability in the drayage sector as outlined in the Recommendation Report. I am persuaded, however, that the comprehensive rate review should occur every thirty (30) months to ensure that the minimum rate continues to provide stability and is able to ensure the drayage sector remains competitive.

Key to adopting this approach is a developing a consensus amongst the stakeholders about what key indicators should be considered before engaging a third party to assist with the research. While I am not persuaded that the indicators found in the Cascadia Study were inappropriate, I want to ensure that prior to the next comprehensive wage review, the OBCCTC engages all the stakeholders to seek a consensus on the key indicators that should be considered in the future.

Proposal 5 – Review rates of PMR and Fuel Surcharge

Review rates of PMR and Fuel Surcharge to ensure covering unexpected increases

There were not many submissions on these proposals. One licensee association sought clarification about the meaning of unexpected cost increases.

These two regulated rates were introduced as a method to address additional costs associated with shorter moves that do not attract compensation for the truck wear and tear and protection against spikes

in fuel costs. The concern expressed by both drivers and licensees is that the PMR and Fuel Surcharge may not accurately compensate independent operators for the additional costs they incur or even is the right model of recovery.

Since there was no resistance to the discussing further at the Industry Advisory Committee, it will be forwarded to them for more discussion.

Conclusion

After a year long process of reviewing the minimum rates, the OBCCTC thanks those stakeholders who participated in the process and provided their submissions.

A proposal on the overtime rate for IOs will be sent out for review and submissions no later than two weeks after the publication of the consultation report.

The publication of this consultation report gives stakeholders sufficient notice to meet the required changes set out in the adopted proposals. The appropriate rate orders will be published as required by the *Act* and *Regulation*.

A handwritten signature in blue ink, reading "Glen MacInnes", is positioned above a solid blue horizontal line.

Glen MacInnes
Container Trucking Commissioner

Appendix A

COMPANY DRIVERS AND INDIRECTLY EMPLOYED OPERATORS						
Date of Rate Order	Inflation Adjustment	Wage Gap Correction Rate	Less than 2,340 hours		2,340 hours or more	
			New Hourly Rate	Total Hourly Increase	New Hourly Rate	Total Hourly Increase
July 1, 2025*	2.1%	\$0.75	\$33.72	\$1.43	\$35.14	\$1.46
July 1, 2024 (Proposal based on estimated CPI)	4%	\$0.75	\$32.20	\$1.96	\$33.69	\$2.02
July 1, 2023 (Recommended Rate based on estimated CPI)	6.2%	\$1.00	\$30.33	\$2.71	\$31.67	\$2.79

*subject to change following comprehensive rate review report.

Appendix B

NEW OVERTIME RATE			
Starting May 1, 2023	9 hours or less in a day	More than 9 hours in a day	More than 45 hours per week²
Company Driver and Indirectly Employed Operator (less than 2,340 hours)	Hourly Rate	1 ½ times the Hourly Rate	1 ½ times the Hourly Rate
Company Driver and Indirectly Employed Operator (2,340 hours or more)	Hourly Rate	1 ½ times the Hourly Rate	1 ½ times the Hourly Rate
Independent Operators	TBD	TBD	TBD

² Part 1 section 1 of ESA defines that a week is from Sunday to Saturday for the purpose of calculating overtime. Only the first nine hours of each workday counts toward the calculation of weekly overtime.

Appendix C

Independent Operators (Hourly Rate)			
Date of Rate Order	Inflation Percentage Increase	Less than 2,340 hours	2,340 hours or more
Projected July 1, 2025*	2.1%	\$71.58	\$73.22
Projected July 1, 2024	4%	\$70.11	\$71.71
Projected July 1, 2023 (based on estimated CPI)	6.2%	\$67.11	\$68.96

*subject to change following comprehensive rate review report.

Appendix D

I/O Minimum Call Out				
	Current	July 1, 2023	July 1, 2024	July 1, 2025*
Minimum Call Out Rate	\$300.00	\$319.00	\$332.00	\$339.00

*subject to change following comprehensive rate review report.

Appendix E

ON-DOCK TRIP RATES													
ITEM	Column 1 Origin/Destination Area	Column 2 Trip to or From Vanterm				Column 3 Trip to or from Deltaport				Column 4 Trip to or from Fraser Surrey Docks (\$)			
			6.2%	4%	2.1%		6.2%	4%	2.1%		6.2%	4%	2.1%
		Current	July 1, 2023	July 1, 2024	July 1, 2025	Current	July 1, 2023	July 1, 2024	July 1, 2025	Current	July 1, 2023	July 1, 2024	July 1, 2025
1	Abbotsford East	\$ 240.12	\$ 255.01	\$ 265.21	\$ 270.78	\$ 240.12	\$ 255.01	\$ 265.21	\$ 270.78	\$ 210.90	\$ 223.98	\$ 232.93	\$ 237.83
2	Abbotsford West	\$ 205.10	\$ 217.82	\$ 226.53	\$ 231.29	\$ 205.10	\$ 217.82	\$ 226.53	\$ 231.29	\$ 187.60	\$ 199.23	\$ 207.20	\$ 211.55
3	Burnaby North	\$ 123.10	\$ 130.73	\$ 135.96	\$ 138.82	\$ 164.10	\$ 174.27	\$ 181.25	\$ 185.05	\$ 128.90	\$ 136.89	\$ 142.37	\$ 145.36
4	Burnaby South	\$ 128.90	\$ 136.89	\$ 142.37	\$ 145.36	\$ 158.20	\$ 168.01	\$ 174.73	\$ 178.40	\$ 123.10	\$ 130.73	\$ 135.96	\$ 138.82
5	Chilliwack	\$ 263.50	\$ 279.84	\$ 291.03	\$ 297.14	\$ 263.50	\$ 279.84	\$ 291.03	\$ 297.14	\$ 228.50	\$ 242.67	\$ 252.37	\$ 257.67
6	Cloverdale	\$ 158.20	\$ 168.01	\$ 174.73	\$ 178.40	\$ 158.20	\$ 168.01	\$ 174.73	\$ 178.40	\$ 140.70	\$ 149.42	\$ 155.40	\$ 158.66
7	Annacis	\$ 140.70	\$ 149.42	\$ 155.40	\$ 158.66	\$ 140.70	\$ 149.42	\$ 155.40	\$ 158.66	\$ 117.20	\$ 124.47	\$ 129.45	\$ 132.16
8	Delta	\$ 158.20	\$ 168.01	\$ 174.73	\$ 178.40	\$ 117.20	\$ 124.47	\$ 129.45	\$ 132.16	\$ 117.20	\$ 124.47	\$ 129.45	\$ 132.16
9	Tri Cities North	\$ 146.50	\$ 155.58	\$ 161.81	\$ 165.20	\$ 175.80	\$ 186.70	\$ 194.17	\$ 198.25	\$ 140.70	\$ 149.42	\$ 155.40	\$ 158.66
10	Maple Ridge	\$ 187.60	\$ 199.23	\$ 207.20	\$ 211.55	\$ 193.40	\$ 205.39	\$ 213.61	\$ 218.09	\$ 158.20	\$ 168.01	\$ 174.73	\$ 178.40
11	Langley West	\$ 181.70	\$ 192.97	\$ 200.68	\$ 204.90	\$ 181.70	\$ 192.97	\$ 200.68	\$ 204.90	\$ 140.70	\$ 149.42	\$ 155.40	\$ 158.66
12	Langley East	\$ 193.40	\$ 205.39	\$ 213.61	\$ 218.09	\$ 193.40	\$ 205.39	\$ 213.61	\$ 218.09	\$ 158.20	\$ 168.01	\$ 174.73	\$ 178.40
13	Mission	\$ 216.90	\$ 230.35	\$ 239.56	\$ 244.59	\$ 222.70	\$ 236.51	\$ 245.97	\$ 251.13	\$ 193.40	\$ 205.39	\$ 213.61	\$ 218.09
14	New Westminster	\$ 134.80	\$ 143.16	\$ 148.88	\$ 152.01	\$ 158.20	\$ 168.01	\$ 174.73	\$ 178.40	\$ 123.10	\$ 130.73	\$ 135.96	\$ 138.82
15	North Vancouver	\$ 123.10	\$ 130.73	\$ 135.96	\$ 138.82	\$ 169.90	\$ 180.43	\$ 187.65	\$ 191.59	\$ 158.20	\$ 168.01	\$ 174.73	\$ 178.40
16	Pacific Highway	\$ 193.40	\$ 205.39	\$ 213.61	\$ 218.09	\$ 158.20	\$ 168.01	\$ 174.73	\$ 178.40	\$ 140.97	\$ 149.71	\$ 155.70	\$ 158.97
17	Pitt Meadows	\$ 158.20	\$ 168.01	\$ 174.73	\$ 178.40	\$ 175.80	\$ 186.70	\$ 194.17	\$ 198.25	\$ 140.70	\$ 149.42	\$ 155.40	\$ 158.66
18	Port Kells	\$ 158.20	\$ 168.01	\$ 174.73	\$ 178.40	\$ 169.20	\$ 179.69	\$ 186.88	\$ 190.80	\$ 128.90	\$ 136.89	\$ 142.37	\$ 145.36
19	Tri Cities South	\$ 140.70	\$ 149.42	\$ 155.40	\$ 158.66	\$ 169.20	\$ 179.69	\$ 186.88	\$ 190.80	\$ 134.80	\$ 143.16	\$ 148.88	\$ 152.01
20	Richmond North	\$ 123.10	\$ 130.73	\$ 135.96	\$ 138.82	\$ 140.70	\$ 149.42	\$ 155.40	\$ 158.66	\$ 123.10	\$ 130.73	\$ 135.96	\$ 138.82
21	Richmond South	\$ 128.90	\$ 136.89	\$ 142.37	\$ 145.36	\$ 128.90	\$ 136.89	\$ 142.37	\$ 145.36	\$ 123.10	\$ 130.73	\$ 135.96	\$ 138.82
22	Surrey North	\$ 140.70	\$ 149.42	\$ 155.40	\$ 158.66	\$ 140.70	\$ 149.42	\$ 155.40	\$ 158.66	\$ 117.20	\$ 124.47	\$ 129.45	\$ 132.16
23	Surrey Central	\$ 158.20	\$ 168.01	\$ 174.73	\$ 178.40	\$ 140.70	\$ 149.42	\$ 155.40	\$ 158.66	\$ 140.70	\$ 149.42	\$ 155.40	\$ 158.66
24	Vancouver North	\$ 117.20	\$ 124.47	\$ 129.45	\$ 132.16	\$ 164.10	\$ 174.27	\$ 181.25	\$ 185.05	\$ 146.50	\$ 155.58	\$ 161.81	\$ 165.20
25	Vancouver South	\$ 117.20	\$ 124.47	\$ 129.45	\$ 132.16	\$ 158.20	\$ 168.01	\$ 174.73	\$ 178.40	\$ 140.70	\$ 149.42	\$ 155.40	\$ 158.66
26	West Vancouver	\$ 128.90	\$ 136.89	\$ 142.37	\$ 145.36	\$ 175.80	\$ 186.70	\$ 194.17	\$ 198.25	\$ 164.10	\$ 174.27	\$ 181.25	\$ 185.05

Example of Trip Renumeration			
Tri Cities North to Deltaport	July 1, 2023	July 1, 2024	July 1, 2025
On Dock Trip Rate	\$ 187.40	\$ 194.17	\$ 198.25
PMR	\$ 25.00	\$ 25.00	\$ 25.00
Fuel Surcharge Rate*	\$ 67.46	\$ 70.16	\$ 71.64
Total	\$ 279.86	\$ 290.06	\$ 295.63

*based on January 2023 FSR of 36% if remained constant

Appendix F

OFF-DOCK TRIP RATES July 1, 2023 (INDEPENDENT OPERATORS)																										
Column 1	Column 2																									
	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P	Q	R	S	T	U	V	W	X	Y	Z
A	112	123	182	182	123	156	177	177	182	150	145	133	123	177	194	156	177	156	177	188	182	166	161	194	188	199
B	123	112	166	166	133	140	161	161	166	140	133	123	123	161	177	145	166	145	161	172	166	150	145	177	172	182
C	182	166	112	123	199	133	133	145	128	150	145	156	177	128	128	150	133	133	128	128	133	128	133	123	123	133
D	182	166	123	112	199	133	128	133	128	150	145	150	177	123	128	145	133	133	128	128	133	128	133	123	123	133
E	123	133	199	199	112	166	194	194	199	161	156	145	133	194	210	166	188	172	194	205	199	182	177	210	205	215
F	156	140	133	133	166	112	133	128	140	145	123	128	150	128	145	123	140	123	133	140	140	123	123	145	140	150
G	177	161	133	128	194	133	112	123	140	161	140	145	177	123	133	133	145	133	133	123	128	128	128	133	128	140
H	177	161	145	133	194	128	123	112	145	161	140	145	182	128	140	128	145	133	140	128	123	123	123	140	133	145
I	182	166	128	128	199	140	140	145	112	133	145	150	150	133	140	145	128	140	123	140	145	128	140	140	140	145
J	150	140	150	150	161	145	161	161	133	112	140	145	123	140	156	150	123	145	133	166	166	145	145	156	161	161
K	145	133	145	145	156	123	140	140	145	140	112	123	145	140	156	128	150	123	140	150	145	128	128	150	150	161
L	133	123	156	150	145	128	145	145	150	145	123	112	140	145	161	133	156	128	145	156	150	133	133	156	156	166
M	123	123	177	177	133	150	177	182	150	123	145	140	112	172	188	156	140	150	150	194	188	156	156	194	194	194
N	177	161	128	123	194	128	123	128	133	140	140	145	172	112	133	133	133	128	128	123	128	123	128	128	128	140
O	194	177	128	128	210	145	133	140	140	156	156	161	188	133	112	156	145	145	140	128	133	140	145	123	128	123
P	156	145	150	145	166	123	133	128	145	150	128	133	156	133	156	112	145	133	140	140	133	128	123	150	145	156
Q	177	166	133	133	188	140	145	145	128	123	150	156	140	133	145	145	112	140	128	145	150	133	140	140	145	150
R	156	145	133	133	172	123	133	133	140	145	123	128	150	128	145	133	140	112	133	140	140	123	128	145	140	150
S	177	161	128	128	194	133	133	140	123	133	140	145	150	128	140	140	128	133	112	133	140	123	133	133	133	145
T	188	172	128	128	205	140	123	128	140	166	150	156	194	123	128	140	145	140	133	112	123	128	133	123	123	133
U	150	166	133	133	199	140	128	123	145	166	145	150	188	128	133	133	150	140	140	123	112	128	128	128	128	140
V	166	150	128	128	182	123	128	123	128	145	128	133	156	123	140	128	133	123	123	128	128	112	123	140	133	140
W	161	145	133	133	177	123	128	123	140	145	128	133	156	128	145	123	140	128	133	133	128	123	112	145	140	150
X	194	177	123	123	210	145	133	140	140	156	150	156	194	128	123	150	140	145	133	123	128	140	145	112	112	128
Y	188	172	123	123	205	140	128	133	140	161	150	156	194	128	128	145	145	140	133	123	128	133	140	112	112	133
Z	199	182	133	133	215	150	140	145	145	161	161	166	194	140	123	156	150	150	145	133	140	140	150	128	133	112

OFF-DOCK TRIP RATES Proposed July 1, 2024 (INDEPENDENT OPERATORS)																										
Column 1	Column 2																									
	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P	Q	R	S	T	U	V	W	X	Y	Z
A	116	127	190	190	127	162	184	184	190	156	151	139	127	184	202	162	184	162	184	195	190	173	167	202	195	207
B	127	116	173	173	139	145	167	167	173	145	139	127	127	167	184	151	173	151	167	178	173	156	151	184	178	190
C	190	173	116	127	207	139	139	151	133	156	151	162	184	133	133	156	139	139	133	133	139	133	139	127	127	139
D	190	173	127	116	207	139	133	139	133	156	151	156	184	127	133	151	139	139	133	133	139	133	139	127	127	139
E	127	139	207	207	116	173	202	202	207	167	162	151	139	202	218	173	195	178	202	213	207	190	184	218	213	224
F	162	145	139	139	173	116	139	133	145	151	127	133	156	133	151	127	145	127	139	145	145	127	127	151	145	156
G	184	167	139	133	202	139	116	127	145	167	145	151	184	127	139	139	151	139	139	127	133	133	133	139	133	145
H	184	167	151	139	202	133	127	116	151	167	145	151	190	133	145	133	151	139	145	133	127	127	127	145	139	151
I	190	173	133	133	207	145	145	151	116	139	151	156	156	139	145	151	133	145	127	145	151	133	145	145	145	151
J	156	145	156	156	167	151	167	167	139	116	145	151	127	145	162	156	127	151	139	173	173	151	151	162	167	167
K	151	139	151	151	162	127	145	145	151	145	116	127	151	145	162	133	156	127	145	156	151	133	133	156	156	167
L	139	127	162	156	151	133	151	151	156	151	127	116	145	151	167	139	162	133	151	162	156	139	139	162	162	173
M	127	127	184	184	139	156	184	190	156	127	151	145	116	178	195	162	145	156	156	202	195	162	162	202	202	202
N	184	167	133	127	202	133	127	133	139	145	145	151	178	116	139	139	139	133	133	127	133	127	133	133	133	145
O	202	184	133	133	218	151	139	145	145	162	162	167	195	139	116	162	151	151	145	133	139	145	151	127	133	127
P	162	151	156	151	173	127	139	133	151	156	133	139	162	139	162	116	151	139	145	145	139	133	127	156	151	162
Q	184	173	139	139	195	145	151	151	133	127	156	162	145	139	151	151	116	145	133	151	156	139	145	145	151	156
R	162	151	139	139	178	127	139	139	145	151	127	133	156	133	151	139	145	116	139	145	145	127	133	151	145	156
S	184	167	133	133	202	139	139	145	127	139	145	151	156	133	145	145	133	139	116	139	145	127	139	139	139	151
T	195	178	133	133	213	145	127	133	145	173	156	162	202	127	133	145	151	145	139	116	127	133	139	127	127	139
U	156	173	139	139	207	145	133	127	151	173	151	156	195	133	139	139	156	145	145	127	116	133	133	133	133	145
V	173	156	133	133	190	127	133	127	133	151	133	139	162	127	145	133	139	127	127	133	133	116	127	145	139	145
W	167	151	139	139	184	127	133	127	145	151	133	139	162	133	151	127	145	133	139	139	133	127	116	151	145	156
X	202	184	127	127	218	151	139	145	145	162	156	162	202	133	127	156	145	151	139	127	133	145	151	116	116	133
Y	195	178	127	127	213	145	133	139	145	167	156	162	202	133	133	151	151	145	139	127	133	139	145	116	116	139
Z	207	190	139	139	224	156	145	151	151	167	167	173	202	145	127	162	156	156	151	139	145	145	156	133	139	116

OFF-DOCK TRIP RATES Proposed July 1, 2025 (INDEPENDENT OPERATORS)																										
Column 1	Column 2																									
	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P	Q	R	S	T	U	V	W	X	Y	Z
A	119	130	194	194	130	165	188	188	194	160	154	141	130	188	206	165	188	165	188	199	194	177	171	206	199	212
B	130	119	177	177	141	148	171	171	177	148	141	130	130	171	188	154	177	154	171	182	177	160	154	188	182	194
C	194	177	119	130	212	141	141	154	136	160	154	165	188	136	136	160	141	141	136	136	141	136	141	130	130	141
D	194	177	130	119	212	141	136	141	136	160	154	160	188	130	136	154	141	141	136	136	141	136	141	130	130	141
E	130	141	212	212	119	177	206	206	212	171	165	154	141	206	223	177	199	182	206	217	212	194	188	223	217	229
F	165	148	141	141	177	119	141	136	148	154	130	136	160	136	154	130	148	130	141	148	148	130	130	154	148	160
G	188	171	141	136	206	141	119	130	148	171	148	154	188	130	141	141	154	141	141	130	136	136	136	141	136	148
H	188	171	154	141	206	136	130	119	154	171	148	154	194	136	148	136	154	141	148	136	130	130	130	148	141	154
I	194	177	136	136	212	148	148	154	119	141	154	160	160	141	148	154	136	148	130	148	154	136	148	148	148	154
J	160	148	160	160	171	154	171	171	141	119	148	154	130	148	165	160	130	154	141	177	177	154	154	165	171	171
K	154	141	154	154	165	130	148	148	154	148	119	130	154	148	165	136	160	130	148	160	154	136	136	160	160	171
L	141	130	165	160	154	136	154	154	160	154	130	119	148	154	171	141	165	136	154	165	160	141	141	165	165	177
M	130	130	188	188	141	160	188	194	160	130	154	148	119	182	199	165	148	160	160	206	199	165	165	206	206	206
N	188	171	136	130	206	136	130	136	141	148	148	154	182	119	141	141	141	136	136	130	136	130	136	136	136	148
O	206	188	136	136	223	154	141	148	148	165	165	171	199	141	119	165	154	154	148	136	141	148	154	130	136	130
P	165	154	160	154	177	130	141	136	154	160	136	141	165	141	165	119	154	141	148	148	141	136	130	160	154	165
Q	188	177	141	141	199	148	154	154	136	130	160	165	148	141	154	154	119	148	136	154	160	141	148	148	154	160
R	165	154	141	141	182	130	141	141	148	154	130	136	160	136	154	141	148	119	141	148	148	130	136	154	148	160
S	188	171	136	136	206	141	141	148	130	141	148	154	160	136	148	148	136	141	119	141	148	130	141	141	141	154
T	199	182	136	136	217	148	130	136	148	177	160	165	206	130	136	148	154	148	141	119	130	136	141	130	130	141
U	160	177	141	141	212	148	136	130	154	177	154	160	199	136	141	141	160	148	148	130	119	136	136	136	136	148
V	177	160	136	136	194	130	136	130	136	154	136	141	165	130	148	136	141	130	130	136	136	119	130	148	141	148
W	171	154	141	141	188	130	136	130	148	154	136	141	165	136	154	130	148	136	141	141	136	130	119	154	148	160
X	206	188	130	130	223	154	141	148	148	165	160	165	206	136	130	160	148	154	141	130	136	148	154	119	119	136
Y	199	182	130	130	217	148	136	141	148	171	160	165	206	136	136	154	154	148	141	130	136	141	148	119	119	141
Z	212	194	141	141	229	160	148	154	154	171	171	177	206	148	130	165	160	160	154	141	148	148	160	136	141	119



OFFICE OF THE
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