April 08, 2025

Office of the BC Container Trucking Commissioner
1085 Cambie Street
Vancouver, BC V6B 5L7
Attn.: Glen MacInnes, Commissioner and Karm Jauhal, Deputy Commissioner

Re: 2025 Rate Review - Recommendation Report

Dear Commissioner MacInnes and Deputy Commissioner Jauhal:

The United Container Driver Association writes in response to the Office of the British Columbia Container Trucking Commissioner's invitation for submissions regarding the 2025 Review Recommendation Report proposals. We write this submission on behalf of our members, consisting of company drivers across the local container trucking industry.

We support continuing with the MRR rate increases for July 1, 2025, as discussed in the 2023 report. The cost of living has skyrocketed over the past decade, and the limited wage rate increases for company drivers before 2022 created an unaffordability crisis. While the recent increases and wage gap corrections have helped somewhat to alleviate this, there remains a gap, and the inflation rate continues to increase. To remedy this situation, the previously announced rate increase remains a necessary step. The 30-month MRR review is an appropriate proposal, as many unforeseen factors could impact the sector. A preplanned 30-month review period allows those to be recognized and responded to without serious delays.

We support adjusting future MRRs starting in 2026 based on the CPI. Having future wage rate increases linked to the CPI would assist in preventing wage rates from falling too far behind the cost of living. Basing adjustments on the CPI also allows licensees to anticipate future rate increases. Despite the decreased wage gap percentage between company drivers and I/Os, it remains larger than the gap that had initially been set, as mentioned in the report. Many view this as unfair. Based on the experience of many members who have owned trucks previously and discussed costs with current owner-operators, we do not believe that a gap is justified by the cost of owning and running a truck. The UCDA and its members strongly recommend further corrections to reduce the wage gap between I/Os and company drivers.

While the rate review and MRR increases are welcomed by many, these steps are ineffective if company drivers do not have stability and job security. We once again request that the OBCCTC create a list for company drivers similar to the one I/Os. In the OBCCTC's monthly update for March 2025, there are 40 more filled company tags than I/O tags, yet there are 226 more company drivers than I/Os. The lack of a company driver list enables licensees to overhire, resulting in far less than full-time hours for many drivers. This negates any relief offered by rate increases.

We have repeatedly witnessed how company drivers are treated as disposable in the drayage sector while I/Os and licensees remain protected. This was highlighted during the recent truck tag reallocation process and the OBCCTC's failure to set up adequate

protections for company drivers or readjust those who lost their jobs. Wage gap corrections and MRR increases are meaningless to company drivers if they are unable to remain employed in the industry.

Respectfully submitted,

United Container Driver Association
ucdassociation@gmail.com