



November 17, 2025

Full Load Transport Services Inc.  
7064 151A Street  
Surrey, BC V3S 8A5

## **Full Load Transport Inc. (CTC Decision No. 29/2025) – Decision Notice**

### **Introduction**

1. In [Full Load Transport Services Inc.](#) (CTC Decision No. 29/2025) (“Commissioner’s Decision”), I determined that Full Load Transport Services Inc. (“Full Load”) failed to pay its company drivers the regulated rate in accordance with section 23 of the *Container Trucking Act* (“Act”) in May and December 2023 and April and August 2024 and owed \$3,845.26 as a result. I also determined Full Load was in breach of section 24(1) of the *Regulation* when it failed to pay its company drivers within 8 days after the end of the pay period.
2. I determined that this was an appropriate case to issue a penalty for the reasons set out in paragraphs 35-39. Consistent with s. 34(2) of the *Act*, I proposed an administrative fine against Full Load in the amount of \$10,000.00 and advised Full Load that I would consider its written response to the proposed penalty if it was received within seven days. I ordered Full Load to pay the company drivers the sum of \$3,845.25 within 45 days of the Commissioner’s Decision and provide evidence of the same within 90 days of the Commissioner’s Decision (Order #1). I also ordered Full Load to bring its wage statements into compliance with Appendix D section B(1) of its CTS license (“Order #2”) and review its payroll records within the Audit Scope (except for those months in the Audit Period) and identify and correct any underpayments as a result the contraventions noted in the Commissioner’s Decision (“Order #3”). Orders #2 and #3 were to be completed within 90 days of the Commissioner’s Decision and Full Load was to advise of adjustments made under them within 100 days of the Commissioner’s Decision
3. The Office of the BC Container Trucking Commissioner (“OBCCTC”) received Full Load’s response to the Commissioner’s Decision on October 5, 2025 (“Submission”).

### **Licensee Response**

4. Full Load asks that I refrain from imposing the administrative fine considering the breaches were the result of clerical mistakes by its accountant that “led to very minor underpayments but those were not intentional underpayments.”<sup>1</sup>

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<sup>1</sup> Submission, page 2.

5. Furthermore, Full Load argues that they owe a “very small amount of \$3,845.25 in total for 5 years” and an administrative penalty of \$10,000 is disproportionate and excessive.
6. Full Load argues that it has paid the higher regulated rates to drivers who have not completed 2,340 hours and does not deduct meal and coffee breaks from its drivers and should be considered when determining if an administrative penalty is needed.
7. Full Load argues that it has taken steps during and after the audit process to ensure the errors have been corrected on going forward basis.
8. Full Load disputes the finding at paragraph 31 of the Commissioner’s Decision that the July 15, 2025 wage statement “does not identify the hourly rate or overtime rate as required” and provided a copy of a July 15, 2025 wage statement for D.S.S. showing wage rates for the hourly rate and overtime rate.

#### **Decision**

9. Full Load does not dispute the findings at paragraphs 27 and 28 of the Commissioner’s Decision that it underpaid its drivers a total of \$3,845.25 and does not dispute that company drivers were paid more than 8 days after the pay period during the Audit Period in breach of section 24(1) of the *Regulation*.
10. I am not persuaded by Full Load’s argument that the total amount owed to drivers is relatively small. At paragraph 36 of the Commissioner’s Decision, I observed that the “clerical errors” were likely not limited to the two months in each year of the Audit Period and the total amount is likely not yet known. I am unclear how Full Load determined that all it owed was \$3,845.25.
11. I am also not persuaded by Full Load’s argument that the proposed administrative penalty should not be imposed because the breaches were “unintentional.” Full Load’s actions did result in underpayment and delayed payments to drivers and even unintentional underpayment and delay can factor into consideration of the appropriate penalty. Furthermore, at paragraphs 34 to 36 and 39 of the Commissioner’s Decision I discussed the importance of proper record keeping and how Full Load had been specifically warned in a prior decision to adjust its record keeping practices, noting that the proposed penalty was needed, *inter alia*, as specific and general deterrence.
12. I am also not persuaded that a licensee’s decision to pay drivers while on meal breaks or pay higher than the minimum regulated rates weigh against an administrative penalty. These actions may be altruistic, or assist with employee retention, but a licensee cannot use such payments in other areas to offset the requirement to pay its drivers the minimum regulated rates.

13. Finally, I did not find that Full Load was in breach of the Appendix D of its CTS license during the Audit Period and therefore did not propose a penalty based on such a breach. I noted that the July 15, 2025 wage statements provided in response to the Audit Report did not indicate the hourly rate and ordered Full Load to bring its wage statements into compliance. I agree with Full Load that the hourly rates were recorded in a different section of the wage statements and am satisfied that the July 15, 2025 wage statements are in compliance with Appendix D.

### **Conclusion**

14. Having carefully considered Full Load's submission, and in light of all of the above-mentioned factors and circumstances, I remain convinced that a \$10,000 penalty is appropriate in this case.
15. In the result, I order Full Load to pay an administrative penalty of \$10,000. Section 35(2) of the Act requires this fine to be paid within 30 days of the issuance of the Decision Notice. Payment should be made by payable to the Minister of Finance and delivered to the Office of the BC Container Trucking Commissioner.
16. Full Load may request a reconsideration of the Commissioner's Decision by filing a Notice of Reconsideration with the Commissioner not more than 30 days after Full Load's receipt of this Decision Notice. A Notice of Reconsideration must be:
- a. made in writing,
  - b. identify the decision for which a reconsideration is requested,
  - c. state why the decision should be changed,
  - d. state the outcome requested,
  - e. include the name, an address for delivery, and telephone number of the applicant and, if the applicant is represented by counsel, include the full name, address for delivery and telephone number of the applicant's counsel,
  - f. signed by the applicant or the applicant's counsel.
17. Despite the filing of a Notice of Reconsideration, and subject to section 39(2) of the Act, the above order remains in effect until the reconsideration application is determined.

This decision notice along with the Commissioner's decision will be published on the Commissioner's website ([www.obcctc.ca](http://www.obcctc.ca)).

Dated at Vancouver, B.C. this 17<sup>th</sup> day of November 2025.



Glen MacInnes  
Commissioner