



October 17, 2025

Ray-Mont Logistics Vancouver Inc.
15900 River Road
Richmond BC, V6V 1L5

Commissioner's Decision

Ray-Mont Logistics Vancouver Inc. (CTC Decision No. 32/2025)

Introduction

1. Ray-Mont Logistics Vancouver Inc. ("Ray-Mont") is a licensee within the meaning of the *Container Trucking Act* (the "*Act*") and the *Container Trucking Regulation* ("the *Regulation*").
2. Section 16 (1)(b) of the *Act* states that a licensee must carry out container trucking services in compliance with:
 - i. this *Act* and the regulations,
 - ii. the licence, and
 - iii. if applicable, an order issued to the person under this *Act*.
3. Ray-Mont currently operates under a container trucking services licence that came into force on December 1, 2024 ("2024 CTS licence"). Section 6.16 of the CTS licences states that "the Licensee must carry out Container Trucking Services for On-Dock Trips and Off-Dock Trips using only Truck Tags allocated by the Commissioner on the conditions imposed by the Commissioner." Section 6.17 states that "the Licensee must assign a Truck Tag to each truck performing Container Trucking Services for On-Dock trips and Off-Dock trips." "Truck Tag" is defined as "an OBCCTC decal affixed to a truck pursuant to this Licence." As per section 1(d)(i) of Appendix B, all Approved Vehicles used by the Licensee for Container Trucking Services must display a Truck Tag to carry out regulated trips.
4. Under section 31 of the *Act*, the Commissioner may conduct an audit or investigation to ensure compliance with the *Act*, the *Regulation* or a licence.

Background

5. The Office of the BC Container Trucking Commissioner ("OBCCTC") introduced the OBCCTC Truck Tag in October 2023 to:
 - a. enhance visibility of trucks approved to perform regulated CTS work.
 - b. streamline tracking of trucks performing regulated CTS work.
 - c. facilitate off-dock enforcement.
6. On October 18, 2023,¹ the OBCCTC issued an Industry Advisory advising licensees that they were responsible to obtain and display the OBCCTC tags.

¹ Industry Advisory – Introduction of the OBCCTC tag – October 18, 2023

7. The OBCCTC has spent significant resources installing OBCCTC decals (tags) on all approved trucks (both company and IO trucks) with multiple opportunities for licensees to ensure trucks performing CTS were properly tagged since the introduction of the OBCCTC tag² in 2023.
8. On or about November 27, 2024, the OBCCTC issued Ray-Mont a 2024 CTS licence which came into effect on December 1, 2024.
9. On or about November 27, 2024, the OBCCTC advised Ray-Mont to send a representative to pick up its expiry decals (these decals are affixed to the OBCCTC tags and are valid until the expiry of the licence).³
10. On or about December 2, 2024, a representative of Ray-Mont picked up the expiry decals that had been allotted to Ray-Mont under its new license and received written instructions to install the OBCCTC expiry decals on each approved truck in Ray-Mont's fleet (both approved company and IO trucks) before December 1, 2024 and was reminded in writing that failure to do so would be in breach of its 2024 CTS licence.

Investigation

11. On June 6, 2025, a container truck without a valid OBCCTC tag was observed traveling along Knight Street in the city of Vancouver. The container truck was identified as Unit 8629 and as owned by Ray-Mont with BC license plate WK4226 ("Impugned Truck").
12. On June 11, 2025, the OBCCTC wrote to Ray-Mont regarding the Impugned Truck that appeared to be performing container trucking services without a valid OBCCTC tag and was required to provide payroll records associated with the driver of the Impugned Truck on or before June 23, 2025.
13. Ray-Mont was also provided with an opportunity to provide submissions on or before June 23, 2025.
14. On June 12, 2025, Ray-Mont provided the payroll records for the driver of the Impugned Truck to the OBCCTC the following response:

Please note: Unit 8629 is part of our tagged list of trucks. When we received the year decals (2024-2026), Unit 8629 was down for ICBC repairs From Nov 28th to Feb 5th. When we received this unit back we over looked it needing the new year decal installed. Please see the attached picture. I have installed its year decal this morning.

15. The payroll records show that the driver of the Impugned Truck was paid the regulated rate on June 6, 2025.

² Industry Advisory – Off dock enforcement- December 19, 2023

⁴ Various Facebook posts from November 14, 2023 to November 18, 2024.

Decision

16. Ray-Mont does not dispute that the Impugned Truck was performing container trucking services and I find that Ray-Mont breached the 2024 CTS License when it operated the Impugned Truck without displaying a valid OBCCTC expiry decal on June 6, 2025.
17. Section 34 of the *Act* provides that, if the Commissioner is satisfied that a licensee has failed to comply with the *Act*, or the terms and conditions of the licensee's licence, the Commissioner may impose a penalty or penalties on the licensee. Available penalties include suspending or cancelling the licensee's licence or imposing an administrative fine. Under section 28 of the *Regulation*, the maximum administrative fine the Commissioner may impose in the case of a contravention relating to the payment of remuneration or fuel surcharge is \$500,000, and, in any other case, the maximum is \$10,000.
18. Smart Choice Transportation Ltd. (OBCCTC Decision No. 21/2016) and subsequent decisions set out the factors which will be considered in assessing the appropriate administrative penalty. In this case I find the following relevant:
 - a. The seriousness of the respondent's conduct
 - b. The damage done to the integrity of the container trucking industry
 - c. The extent to which the Licensee was enriched;
 - d. Factors that mitigate the respondent's conduct;
 - e. The need to demonstrate the consequences of inappropriate conduct to those who enjoy the benefits of having a CTS license;
 - f. The need to deter licensees from engaging in inappropriate conduct; and
 - g. Orders made by the Commission in similar circumstances in the past.
19. In cases where licensees have failed to display OBCCTC truck tags, administrative penalties have been proposed because they provide a visible indicator to other container drivers and licensees that the truck is registered with the OBCCTC and is approved to perform container trucking services and balance the amount of work against the number of tagged trucks and drivers in order to provide labour stability in the drayage sector - see Prudential Transportation Ltd. (CTC Decision No. 17/2025) and Aheer Transportation Ltd. (CTC Decision No. 15/2025) and Orca Canadian Transport Ltd. (CTC Decision No.31/2025). I adopt this analysis.
20. The OBCCTC has also been for many years issuing bulletins and industry advisories to licensees on this requirement. Around the time the 2024 licences were awarded the OBCCTC issued several communications, including on social media,⁴ to remind licensees – including Ray-Mont - that they were required to ensure the new expiry decals were adhered to the trucks before December 1, 2024.
21. While I accept that the Impugned Truck was being repaired between November 28, 2024 to February 2025, Ray-Mont was aware of its responsibility to ensure that all trucks performing regulated CTS work displayed a valid OBCCTC tag, yet it is reasonable to assume that Ray-Mont used the Impugned Truck to perform container trucking services without displaying an OBCCTC truck tag

⁴ Various Facebook posts from November 14, 2023 to November 18, 2024.

until it was installed on or around June 12, 2025 as stated in its submission. I find that this breach occurred over a significant period of time.

22. Like all licensees, Ray-Mont is responsible for knowing its obligations under the legislation and its licence, including ensuring that vehicles performing regulated container trucking services are properly tagged.
23. I note that Ray-Mont immediately took steps to correct its non-compliance upon receiving the Investigation Report. This is a mitigating factor.
24. In this case, I did not find any breach of the *Act*, *Regulation* or term of the licensee related to payments of remuneration and the maximum administrative fine is therefore \$10,000.
25. I have concluded that an administrative penalty of \$800 is appropriate. This is consistent with fines imposed in similar circumstances and should deter Ray-Mont and licensees generally from failing to display a valid truck tag.
26. Therefore, in accordance with section 34(2) of the *Act*, I hereby give notice as follows:
 - a. I propose to impose an administrative fine against Ray-Mont in the amount of \$800.
27. Should it wish to do so, Ray-Mont has 7 days from the receipt of this notice to provide the Commissioner with a written response setting out why the proposed penalty should not be imposed.
 - If Ray-Mont provides a written response in accordance with the above, I will consider its response, and I will provide notice to Ray-Mont of my decision to either:
 - i. Refrain from imposing any or all of the penalty; or
 - ii. Impose any or all of the proposed penalty.

Conclusion

28. In summary, Ray-Mont has been found to have violated the CTS licence by performing container trucking services in the Lower Mainland using a truck without a valid OBCCTC expiry decal on June 6, 2025. I have determined that it is appropriate to propose of a \$800 penalty.
29. This decision will be delivered to Ray-Mont and will be published on the Commissioner's website (www.obcctc.ca)

Dated at Vancouver, BC this 17th day of October 2025.



Karm Jauhal
Deputy Commissioner