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## **Submission to the Office of the BC Container Trucking Commissioner - February 2026**

### **Re: Proposed Framework for the 2026–2029 CTS Licensing Period**

Thank you for the opportunity to provide input on the proposed three-year Container Trucking Services licensing framework.

As the Lower Mainland gateway continues to evolve, the transition to a three-year licence term creates an opportunity to ensure the Truck Tag Management framework remains flexible, investment-aligned, and capable of supporting Canada's trade objectives.

#### **1. Preservation of Regulatory Discretion**

The Commissioner's discretion in allocating truck tags is central to the regulatory framework and should remain responsive to changing market conditions.

Companies' historical tag counts or percentage-based growth limits should not operate as fixed ceilings where capital has been deployed, incremental container volumes have been created, demand is demonstrable, and compliance and performance are proven. In those circumstances, the framework should allow incremental tag allocation to respond accordingly.

Over a three-year term, trade volumes, export diversification, infrastructure expansion, and gateway utilization can shift materially. The tag system must retain sufficient flexibility to respond within a licensing period rather than waiting for the next cycle. Treating existing tag counts as permanent limits risks discouraging investment and suppressing capacity creation.

#### **2. Company Driver and Independent Operator Tags**

A 50/50 balance between Independent Operator and Company Driver tags is not prescribed in legislation and should remain responsive to operational realities and market demand.

In several segments of the gateway, Company Driver and I/O models are not interchangeable. Specialized bulk operations, heavy-haul agricultural exports, terminal-based automation, and integrated rail coordination often require centralized dispatch, capital-intensive chassis fleets, and company-driver deployment.

Independent operators play a foundational role in the sector. However, treating tag categories as numerically equivalent where their functions differ can unintentionally constrain capacity in the very areas where the gateway is most capital-intensive and performance-sensitive. Allocation decisions should reflect operational capability rather than parity assumptions.

### **3. Distinguishing Cargo Creators from General Market Carriers**

There is a clear distinction between carriers competing for existing drayage volumes and integrated operators who generate new container volumes through terminal investment and value-added processing.

Companies like WTC invest significant capital in specialized terminals and infrastructure that attract incremental export and import flows. Those volumes require corresponding specialized trucking capacity to function. A purely zero-sum allocation approach may not fully account for operators who are expanding total gateway throughput rather than competing for an existing pool of work.

At a time when provincial and federal policy emphasizes trade diversification and supply chain resilience, the regulatory framework should ensure that investment-driven volume creation is not constrained by static allocation assumptions.

### **4. Supporting Trade Fluidity**

International trade conditions remain fluid. Export markets, infrastructure projects, and cargo patterns will continue to evolve over the next three years.

The tag system should enable export capacity, not inhibit it. Percentage-based growth caps or rigid parity assumptions risk entrenching legacy operating models at a time when the gateway must remain adaptive and investment-oriented.

A modernized framework should preserve discretion, recognize demonstrable capital deployment and incremental volume creation, distinguish between materially different operating models, and allow compliant operators to scale in proportion to gateway growth.

### **Conclusion**

The proposed licensing period presents an opportunity to align tag allocation with long-term gateway competitiveness.

A framework that preserves regulatory flexibility while reflecting operational realities will strengthen both regulatory integrity and Canada's trade capacity.

Thank you for considering these recommendations.

Sincerely,



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