

February 8, 2026

Office of the British Columbia
Container Trucking Commissioner
1085 Cambie Street
Vancouver, BC V6B 5L7

Attention: Glen MacInnes

Sent via email: registrar@bcctc.ca

Subject: 2026 CTS Licence Proposed Changes

Good morning Glen,

Upon perusing the 2026 CTS Licence Proposed Changes, the key highlight instituting electronic funds transfer (direct deposit) is widely welcomed as outlined. This mitigates NSF cheques or delay of issuance by the employer, drivers budget their expenses in line with payroll period received.

Provide email notification to I/O that are in receipt of wait time remuneration at each upcoming quarterly payments. Drivers don't know if they have quarterly wait time remuneration. Currently is just a blanket notification to industry of quarterly wait time remuneration. I/O are just relying on blind faith that companies will pay out quarterly wait times.

Electronic Container Trucking Services Tracking is welcomed to monitor benchmark metrics of container movement efficiency during hours worked. Based on our company example, prior to the new December 01, 2025 CTS. Starting first light, moving three containers would average 4-5 hrs and be told done for the day.

After December 01, 2025 the same three container moves will take 8-12 hrs and told to go home. Several factors, stretching the drivers day for GPS metrics. Inefficient dispatching to stretch the day for the same three container moves. Too many issued company truck tags that dilute available container moves to I/O whether the company has one or several company licences under one umbrella that moves work around that would normally be moved by I/O.

There should be at least a minimum daily benchmark four container moves within a reasonable period of hours for I/O in this current economic times to balance truck operational expenses and family expenses.

Termination of Sponsorship Agreement

b. terminated for any reason

This wording is currently an issue at our company, I have one member I/O that has undergone surgery and is going through stages of recovery in order to be medically cleared to be back in the truck. The company terminated his employment for medical leave, this is a human rights violation that can be elevated to a CRT filing. Employer can't terminate an I/O/IEO for medical leave or if a woman pregnant on maternity leave.

What guard rail language is there to protect I/O/IEO on medical or maternity leave? I/O/IEO shouldn't lose their job or seniority standing with there company on medical or maternity leave.

Inactive I/O is no longer indicated, is this still a cloud classification for medical leave I/O's?

Placing a IEO under the I/O for a period of time is cost prohibitive to the I/O as the container moves are governed by the company. For example, if it's the status quo of three containers per day as well depending where the routes are. It would end up the I/O subsidizing the daily operation of there truck, while the company trucks are averaging five+ container moves each day with shorter time and distance.

Attached is a sample size daily trip sheet performed by our parent company Aheer Transport Ltd when they laid off most of their I/O and switched at least half of the fleet to company trucks leading up to the new December 01, 2025 CTS license. Performed work that our I/O would normally perform, this sample size daily trip sheet of eleven container moves??. As much as x 5 company trucks performing the same container moves from the same facility LuLu Island Terminals, reducing the I/O daily move count from four to five down to a flat line of three container moves per day. There is a imbalance of normal available work now shifted to company trucks.

The IEO could be feasible option for the I/O if the company trucks didn't dilute the work from the I/O as well a daily minimum benchmark four container moves within reasonable hours so the I/O is not at a daily loss.

For medical/maternity leave that is extended beyond the 90 days, the I/O should be able to have extended IEO time until ready to return to work. Or, the company can have a temporary I/O work in lieu until return.

Sincerely,

A large black rectangular redaction box covering the signature area.