

Port Transportation Association



February 9, 2026

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

VIA: Email registrar@obcctc.ca

Subject: 2026 CTS Licence – Proposed Changes Submission

Dear Commissioner MacInnes,

Thank you for circulating the January 2026 CTS Licence – Proposed Changes and the marked copy for review. The Port Transportation Association (PTA) has carefully reviewed the proposed amendments and provide below our responses, clarifying questions, and suggested additions where appropriate. Our aim is to ensure the licence supports stable, compliant operations while protecting drivers and providing workable obligations for licensees.

1) Licence Term (Three-year term)

The PTA commends the OBCCTC for expanding the license term; however, we would like to propose extending the term to four years for the 2026 licence, followed by a five-year licence term in 2030 to match the licensing period of the Vancouver Fraser Port Authority (VFPA).

Since both an OBCCTC-issued licence and a VFPA TLS licence are required for carriers to operate, having matching renewal periods would make the most sense for licensees.

A synced licence term improves stability and better enables carriers to plan and invest in their companies and in turn the BC economy. Given that both licences contain provisions for their issuing bodies to cancel a licence at their discretion, there is little risk to the OBCCTC should a licensee repeatedly violate the terms spelled out within the licence or the British Columbia Container Trucking Act and Regulations. Companies that may no longer wish to operate within the regulated drayage sector of BC have the ability to surrender in their licence(s).

2) Electronically Transmitted Wage Statements and Electronic Funds Transfer (EFT)

The PTA would like to better understand the reasoning for the requirement for all companies to transition from paper cheques/paystubs to electronic versions, such as whether this is to facilitate audits, or whether it is in response to driver requests.

P.O. Box 1791 Parksville, BC V9P 2H6

778-228-0544

administration@ptavancouver.com

<https://ptavancouver.com/>

For transparency and industry purposes, the PTA intends to distribute all content and post all meaningful dialogue on our website, to be viewed by both industry and the public.

Port Transportation Association



While it can be assumed that a high percentage of companies are already providing EFT wage payments, there are concerns that this is an overstep by the OBCCTC, as cheques are still legal tender.

For those not already using EFT payroll, they may incur a financial cost to set up and operate. Additionally, it will change a company's payroll schedule, as payroll must be submitted in advance to deposit on the correct date, as opposed to writing a cheque on the same day.

As written, the 2026 Licence proposal is vague on what would constitute appropriate electronic wage statements and EFTs.

A clear outline of how driver wage statements must be delivered, ie. specify acceptable formats, delivery timelines, and exceptions, as well as whether EFT implies direct-to-bank payment only, or whether e-transfer would also be acceptable would be appreciated in order to stem an confusion or issues in future audits.

Additional concerns regarding this requirement include:

- Will considerations be made for drivers who wish to continue receiving payment by cheque?
- Will considerations be made for drivers who wish to continue receiving paper wage statements?
- Will there be considerations for off-cycle payments, such as holiday pay?
- Will there be considerations if there is a banking system outage or error that prevents payroll data processing on the required date?

3) CRA Deduction Numbers and WorkSafe BC Accounts (Employer Confirmation)

While the PTA sees no issue with this, we believe the licence should clearly state precisely which entities must obtain and report CRA payroll deduction numbers and WorkSafe BC numbers. Clarification on the mechanism and timing for reporting these numbers to the OBCCTC, and the consequences of non-compliance, would be appreciated.

4) Housekeeping Changes (Appendices D, E and defined terms)

The PTA requests that the OBCCTC clarify the practical impact of the new definitions on current operations, including any retroactive implications.

5) Items for Consideration

P.O. Box 1791 Parksville, BC V9P 2H6
778-228-0544
administration@ptavancouver.com
<https://ptavancouver.com/>

For transparency and industry purposes, the PTA intends to distribute all content and post all meaningful dialogue on our website, to be viewed by both industry and the public.

Port Transportation Association



The PTA would like to suggest the following additions to the 2026 Licence in an effort to reduce non-compliance risks for licensees:

- **Audit and Penalties:** Provide additional clarification on how administrative penalties are issued, and how long they are counted against a licensee in future licensing and tag distributions. The PTA proposes a clear penalty schedule with a roll-off date similar to ICBC, to avoid licensees being penalized multiple times for the same transgression and to ensure a fair and equitable playing field for all licensees.
- **Tag Metrics:** Provide clear metrics on tag usage, including what constitutes full-use, how many tags are removed as part of the licence, and what industry standards or guidelines this is based upon.
- **Request for Clarity/Response:** With each licensing period come changes, and in recent years there have been limited options for licensees to obtain clear guidance from the OBCCTC to ensure they are compliant, leaving audits as the sole checkpoint. We ask that the OBCCTC provide resources prior to the licence start, or be willing to provide a 60-day grace period spanning before and after the 2026 licence start date to properly assist companies with compliance questions and to allow a smooth transition into the licence terms.

While not within the scope of the 2026 Licence itself, we would like to proactively advocate for a simpler licensing approach, such as automatic renewal for companies that have held a licence for three consecutive terms, or a simplified application process.

We appreciate the opportunity to provide feedback and look forward to working collaboratively to implement a CTS Licence that supports industry stability. We welcome future opportunities to engage in discussion surrounding the Licence and the application process.

Sincerely,

A handwritten signature in black ink, appearing to read "K. Stefanovic", written over a horizontal line.

Kailee Stefanovic
Executive Director
Port Transportation Association
administration@ptavancouver.com
778-228-0544

P.O. Box 1791 Parksville, BC V9P 2H6
778-228-0544
administration@ptavancouver.com
<https://ptavancouver.com/>

For transparency and industry purposes, the PTA intends to distribute all content and post all meaningful dialogue on our website, to be viewed by both industry and the public.