

United Container Driver Association
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February 9, 2026

Office of the BC Container Trucking Commissioner
1085 Cambie Street
Vancouver, BC V6B 5L7
Attn.: Glen MacInnes, Commissioner
Karm Jauhal, Deputy Commissioner

Re: 2026 Container Trucking Services Licence Proposed Changes

Dear Mr. MacInnes and Mrs. Jauhal:

The United Container Driver Association (the “UCDA”) is pleased to offer the following submission in response to the Office of the BC Container Trucking Commissioner’s proposed changes to the Container Trucking Services Licence (the “Proposal”).

The UCDA’s members are truckers who work as employees (both “directly employed operators” and “indirectly employed operators”) for OBCCTC licensees, including both unionized and non-unionized companies. Our members face unique challenges to their job security and working conditions. The OBCCTC has protected licensees from open competition by limiting the number of companies in the container trucking industry, some of which are owned by the same owners. The OBCCTC also regulates the number of independent operators (I/Os). However, the OBCCTC continues to provide only limited protection to the drivers who work as employees for trucking companies. The proposed changes do nothing to provide meaningful protections to these drivers, who have long been discriminated against.

In our members’ experience, many trucking companies have demonstrated their willingness to avoid existing provincial and federal employment and labour laws. Due to the closed nature of the industry, our members fear being blacklisted if they speak out against employer misconduct. This is exacerbated by the difficulty of finding a new position in the current job market for truckers. Further, many of our members have encountered many problems with the confidential complaint line, leading to unsatisfactory experiences and outcomes. When exploring other options numerous drivers face difficulties navigating the legal system because they speak English as a second language. For those who struggle due to this, hiring legal aid is not an option given the current economic climate and high cost of living.

We strongly request that the OBCCTC’s exercise its authority under section 18 of the *Container Trucking Act*, SBC 2014, c 28 (the “CTA”) to regulate the terms and conditions of employment of trucking company employees. Appendix A of the Proposal lists prohibited practices. 1.(j) prohibits threatening, harassing, coercing, or attempting to influence a Trucker in any way, either indirectly in relation to the Trucker’s compensation. Why is this prohibition limited to compensation? This narrow prohibition is a failure by the OBCCTC to adequately protect drivers. It emboldens employers to engage in harassment, coercion and misconduct in areas

unrelated to compensation. Ensuring drivers are paid properly is only useful if drivers are able to keep their jobs, which is a reality that must not be ignored.

The 2024 Container Trucking Services Licence had a devastating impact on company truck drivers. This was mainly due to the lack of protections in place for these drives, despite these protections repeatedly having been recommended. There were no plans in place by the OBCCTC to protect or accommodate workers impacted by the tag reallocation. This resulted in approximately 130 drivers being pushed out of the container trucking industry. Meanwhile, 70 I/Os were accommodated. This double standard must not be allowed to continue with the 2026 CTS licence. Sufficient action to remedy this has not yet been taken.

The term of the 2026 CTS licence has been extended from 2 to 3 years. This provides more security for licensees, regardless of their treatment of workers. This is unacceptable given the various forms of workplace harassment drivers experience on a regular basis from some licensees. If the licence term is to be extended, then job security and fair treatment must also be guaranteed for company drivers.

The UCDA recognizes that there are existing laws and mechanisms in place to deal with many issues impacting drivers. However, due to the closed nature of the container trucking industry, language barriers, poor performance by some unions, and heavy-handed employer intimidation tactics, our members find it difficult to access these laws and mechanisms.

Under the *CTA* the OBCCTC has the authority to protect the legitimate rights of container truck drivers. We encourage the OBCCTC to exercise its legislative authority to protect the legitimate rights of container truck drivers.

We offer the following specific recommendations:

1. Whether the previous licensee ranking system is used in the tag allocation process or some other method, factor in the following:
 - Complaints regarding exploitation of drivers and workplace harassment
 - Turnover rates. High turnover can indicate poor working conditions
 - A lack of long-term employment or full-time positions
 - Whether the licensee engages in over-hiring
 - Whether terminations are for legitimate or baseless reasons
 - Positive aspects, such as a good workplace environment and long term retention of drivers, should be credited
2. A company driver list. While the OBCCTC has expressed some willingness to establish a list similar to the I/O list for company drivers, there has been no meaningful progress on this. If a list is not in place when the 2026 CTS licence comes into effect, then drivers can once again become the unintended victims of tag reallocation. The following should be included in a company driver list:
 - Drivers who are currently employed in the container trucking industry
 - Drivers who were recently laid off or unfairly terminated for unfounded reasons
 - Drivers who lost their jobs as collateral damage due to the OBCCTC's actions

- The list should go back to, at least, November 2024 in order to include those forced out by the 2024 CTS licence and reallocation process
- 3. New drivers must first be hired from the company driver list, with all other hiring frozen until these drivers have had a chance to reenter the sector.
- 4. Truck tags should not be reduced further, given the lack of work currently available for truck drivers in BC outside of the container trucking industry.
- 5. Include more protections for drivers in the prohibited practices section of the licence. Some of those to be included should be prohibitions against:
 - Over hiring
 - Exploitation
 - Harrassment
 - Terminations for groundless reasons
- 6. A reconsideration of the 50/50 policy. Our members supported this policy because they believed they would have other protections, such as a company driver list. They also believed they would have a chance to become I/Os. Due to the lack of protections and support from the OBCCTC, many have had to leave the industry or become IEOs.
- 7. Clear requirements for I/Os:
 - I/O must be the owner and main operator of a vehicle
 - If an I/O is not available full time for an extended period, then they should have to state it and there should be limitations on the amount of hours the tag can be used for
 - An I/O tag must be limited to the individual who is named in the agreement and must not be shared with friends or family
- 8. IEO positions should be limited and restricted for temporary use
- 9. Company tags should be issued on the condition it is meant to be used for a single full-time position. It should only be used for part time work if there is excess work available.
- 10. Allow company drivers to move along with a truck tag that has been reallocated to avoid job loss.

The UCDA appreciates the opportunity to offer our recommendations to the OBCCTC. Please feel free to contact us if you have any questions concerning this submission.

Respectfully submitted,

United Container Driver Association