



**FREEDOM GLOBAL CONTAINER
TRUCKING ASSOCIATION**

FREEDOM GLOBAL CONTAINER TRUCKING ASSOCIATION (FGCTA)

**Submission to the Office of the BC Container Trucking Commissioner
(OBCCTC)**

Re: 2026 CTS License - Proposed Changes

Date: February 2026

Overview of Submission

Freedom Global Container Trucking Association (FGCTA) submits this letter to provide practical input on operational and regulatory issues impacting participants in the container trucking industry, including Independent Operators (I/Os) and Company Drivers.

FGCTA is a non-profit association connected to the container trucking sector. The Association routinely gathers feedback from drivers and operators, identifies barriers affecting day-to-day operations, and raises these issues as they arise with the objective of supporting fair and workable outcomes within the regulated framework.

This submission focuses on three areas that FGCTA submits are central to stability and consistency in the regulated system:

- Sponsorship agreements aligned with demonstrable work requirements and operational needs
- Continued support for Section 24 nomination truck tag policy as a tool to fill vacancies, maintain system balance, and support continuity
- Consistent application of OBCCTC compensation guidelines for Company Drivers

FGCTA respectfully submits that clear expectations and consistent application in these areas will reduce uncertainty, limit preventable disputes, and support long-term stability across the sector.

Association Role and Industry Engagement

Freedom Global Container Trucking Association (FGCTA) is a non-profit association related to the container trucking industry. The Association's role is to understand and elevate issues experienced by I/Os and Company Drivers - particularly issues that affect access to work, operational continuity, and compensation practices.

FGCTA's perspective is informed by practical operating realities and direct engagement with industry participants. The Association understands that regulatory requirements are most effective when they reflect real-world conditions such as fluctuations in work volumes, workforce transitions (including retirements and departures), and the need for predictable and fair compensation practices that support stable service for customers and sustainable participation for workers.

Key Issues and Recommendations

A. Sponsorship Agreements and Alignment With Actual Work Availability

FGCTA submits that Sponsorship Agreements should be closely aligned with a licensee's existing and demonstrable work requirements. Sponsorship applications should be based on a clear operational need to service current work and customer demand, and approvals should reflect that need.

FGCTA submits that aligning sponsorships with real work volumes will:

- Support fair utilization of existing operators
- Prevent unnecessary overcapacity and underemployment
- Help licensees maintain stable and reliable service for customers

A sponsorship framework grounded in actual operational requirements strengthens the regulated system by balancing workforce capacity with market realities.

B. Nomination Truck Tag Policy (Section 24) – Continuity, Fairness, and System Balance

FGCTA submits that the Section 24 nomination truck tag policy is a critical operational tool that supports continuity of service and stability within the regulated framework. Vacant truck tags are an expected and unavoidable reality in the industry due to retirement, resignation, or other departures of existing Independent Operators. In these circumstances, the ability to fill vacancies promptly helps prevent disruptions to service, reduces operational uncertainty, and supports customer reliability.

FGCTA supports the continued use of Section 24 nominations and submits that they should be clearly recognized as an appropriate mechanism to maintain continuity when a vacancy arises within a licensee.

I. Preference for cross-division Independent Operators within the same company

FGCTA further submits that where a company operates across highway division, Independent Operators who have worked with the same company in highway division for an extended period should be given preference when filling vacant tags. This approach advances the regulatory objectives of stability, compliance, and continuity for the following reasons:

1) Proven working relationship and reduced transition risk

Cross-division I/Os are already known to the licensee and have an established work history, familiarity with the company's dispatch practices, customer requirements, and compliance

expectations. The company likewise knows the operator's performance and reliability. This reduces onboarding friction, minimizes disputes, and supports immediate operational continuity.

2) A practical continuity mechanism when operators retire or depart

When an existing I/O retires or leaves for any reason, Section 24 nominations allow the licensee to maintain operations without disruption by transitioning a qualified and known I/O into the vacancy. This supports uninterrupted service and reduces instability for workers and customers.

3) Supports the intended balance between I/O and Company Driver operations

FGCTA submits that Section 24 nominations play an important role in maintaining balance within the regulated system by enabling vacant I/O tags to be filled as I/O tags rather than drifting into operational substitution. In practice, this helps preserve the integrity of the I/O component of the system and supports stable participation for Independent Operators.

4) Broad operational acceptance and structured oversight

FGCTA notes that unions and companies commonly support this approach. I/Os in highway divisions typically work under established union and company supervision and standards, which promotes accountability and consistent performance. Preference for experienced cross-division I/Os therefore aligns with stable workforce management and predictable service outcomes.

Recommendation

FGCTA respectfully recommends that OBCCTC maintain and support the Section 24 nomination process and provide clear policy direction that recognizes:

- I. The importance of timely vacancy filling; and
- II. The appropriateness of giving preference to qualified, long-standing cross-division I/Os within the same company when a tag becomes vacant.

C. Company Driver Compensation

FGCTA acknowledges that most licensees compensate Company Drivers in accordance with OBCCTC rate guidelines. However, FGCTA submits that greater consistency is required to ensure that pre-trip and post-trip time is paid uniformly across all licensees.

Further, FGCTA submits that where a Company Driver reports on time and is ready to commence work, but cannot proceed with a trip due to equipment or truck-related issues, the driver should be paid waiting time in accordance with OBCCTC policy and guidelines.

FGCTA submits that clear and consistent application of these requirements will promote fairness, reduce disputes, and ensure Company Drivers are properly compensated for time during which they are present, available, and required to remain on duty.

Conclusion

Freedom Global Container Trucking Association appreciates the opportunity to provide this submission. FGCTA respectfully submits that aligning sponsorship approvals with actual work

demand, supporting the appropriate use of Section 24 nominations to maintain continuity and balance, and ensuring consistent compensation practices for Company Drivers will collectively strengthen fairness, stability, and confidence in the regulated container trucking system.

FGCTA remains available for further engagement and discussion as these issues are considered.

Respectfully submitted,
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