



October 27, 2026

2026 CTS Licensing Update

The Office of the BC Container Trucking Commissioner (OBCCTC) is distributing the final 2026 CTS licence this week to all applicants who met the conditions for final approval.

A few applicants who received conditional approvals have asked the Commissioner to reconsider tag allocations. As industry will know, subject to limited exceptions, truck tag decisions are final. See the [OBCCTC Rules of Practice and Procedure](#) at page 9. This has always been the case.

I will take an opportunity to address some general issues raised in the correspondence.

1. The Commissioner applied metrics/parameters that were not disclosed.

Applicants were advised in advance that applications for truck tags would be assessed against the at or near full-time equivalent utilization and wages criteria (“full-time criteria”). Given that these values were determined based on the information provided by returning applicants, it was not possible to publish the numbers prior to receiving the applications. The reliance on aggregate data submitted by applicants as part of the licence application was applied in 2024.

Applicants were also advised that the Commissioner would consider “any empirical analysis and/or comparison that assists in the determination of the number of requested truck tags” submitted.

2. The metrics applied by the OBCCTC are mere indicators and are not determinative measures to assess the need for truck tags. Each case required an individualized assessment.

Each application was assessed individually. As indicated in the Applicant Handbook, the Commissioner also considered “any additional information the applicant feels the Commissioner should be made aware of in relation to the applications.”

3. The Commissioner could have issued more truck tags than listed in the Applicant Handbook for the 2026 CTS license.

Section 7(2)(b) of the *Container Trucking Regulation* requires the Commissioner to publish the number of truck tags available at the beginning of the application period and section 9(2) provides that the Commissioner cannot issue a greater number of truck tags. The Applicant Handbook stated that there were 750 company tags and 750 Independent Operator tags available. The mandate of the OBCCTC is, in part, to limit the number of trucks in the regulated drayage sector, as discussed in the [“CTS Licence Reform 2020 Licence Application Process & Tag Management Policy Consultation Report”](#) (TLS Tag Count Target).

4. The Commissioner should have considered applications for truck tags above the limit set out in the Applicant Handbook.

To ensure that returning applicants with a higher score cannot monopolize the industry by securing all the available tags, the number of tags each applicant could apply for was limited. Without such cap, truck tags (and access to the marine terminals) would be concentrated among a smaller group, leaving lower ranking returning applicants with fewer tags, and all but shutting out new applicants.

5. The Commissioner should have considered customer commitment letters even if customers were unwilling or unable to provide copies of agreements in principle.

Applicants were advised that supporting agreements were required to demonstrate additional work and to verify the information contained in the C.1 Form and that without such agreements additional work would not be considered. Agreements in principle reflect at least a preliminary understanding between the parties and are closer to a formal commitment to move containers. Aspirational commitments will not necessarily translate into actual commitments, and factoring them into the analysis is likely to result in the distribution of more tags than warranted. Accepting assertions of additional work without supporting documentation would be unfair to other applicants.

6. The Commissioner should consider new information and arguments after issuing the tag decision.

The onus was on applicants to provide a complete application. Subject to limited exceptions, tag decisions are final. This is consistent with the fact that there are a limited number of tags available. It would also not be fair to other applicants to reopen a tag decision to receive new information after applications have closed.

7. The Commissioner should have considered overtime.

Overtime was considered in the decisions, which recognized that some overtime is “generally unavoidable given the delays can occur at any point moving a container”. It is not axiomatic that additional truck tags can relieve all overtime. Unavoidable delays at the marine terminals are now dealt with in part by “wait time payment” in the *Container Trucking Regulation*. Additional tags will not reduce wait times at marine terminal or any other causes or delays (i.e. staffing shortage, traffic congestion, customer delays) that require the driver to incur overtime. Applicants who merely asserted that tags were required to address overtime without explaining how were generally not awarded additional tags on this basis. The onus was on applicants to provide analysis or explanation – empirical or otherwise – of how their overtime could be redistributed to meet the full-time criteria



for any tags requested. Accepting that more tags would reduce overtime without any supporting evidence would risk introducing too many truck tags into the system without necessarily reducing an applicant's reliance on overtime.

8. The Commissioner's full-time criteria for each truck tag do not address operational realities, specialized equipment and difficulties in accessing marine terminals.

Operational challenges and specialized equipment may be relevant in some cases. However, it was incumbent on applicants to demonstrate how their circumstances were unique or unavoidable and could only be addressed through additional truck tags. Operational challenges generally exist for most licensees and there are a limited number of truck tags available. It would be unfair to other licensees, and inconsistent with the OBCCTC's mandate, if licensees were permitted to have tagged trucks on "standby" simply to address operational pressures.

9. The Commissioner's limitation of 750 Company Tags and 750 I/O Tags was arbitrary.

These numbers are consistent with the number of active truck tags in 2025 (see the [OBCCTC monthly reports](#)). These total numbers (1,500 tags) were also arrived at after consultation with the Vancouver Fraser Port Authority. See #3 above on Commissioner's mandate.

10. The Commissioner did not consider excess median number of kilometers when assessing truck tag applications.

There are various reasons why an applicant's historic utilization based on kilometers may be higher than the industry median. Applicants were required to demonstrate how any above median kilometers meant that the truck tags requested would be fully utilized.

Sincerely,

OFFICE OF THE BC CONTAINER TRUCKING COMMISSIONER

Glen MacInnes
BC Container Trucking Commissioner