

Your way ahead



100 – 20111 93A Avenue
Langley, BC V1M 4A9
e bcta@bctrucking.com
t 604 888 5319 f 604 888 2941
toll free 1 800 565 2282

bctrucking.com

January 19, 2021

Mark Collins
President and Chief Executive Officer
BC Ferries
Via email: mark.collins@bcferries.com

Re.: Access to Reservation System and Long Wait Times for Commercial Carriers at Terminals

Dear Mr. Collins:

I am writing on behalf of the BC Trucking Association (BCTA) to express concern about the BC Ferries reservation system and long wait times at terminals for heavy commercial trucks, which have created challenges for compliance with hours of service (HOS) regulations for professional drivers, as well as significant greenhouse gas (GHG) emissions from their vehicles idling.

BCTA is a member-based, non-profit, non-partisan organization dedicated to advocating for and representing the commercial road transportation industry in BC. BCTA members include trucking companies hauling every type of freight, as well as charter and scheduled motor coach companies. BCTA represents over 1,200 trucking and motor coach fleets that operate over 13,000 commercial vehicles and employ over 26,000 British Columbians.

One of BCTA's priorities is the safety of commercial vehicle operators and the public. The federal electronic logging device (ELD) mandate, which comes into force on June 12, 2021, will improve safety for all road users by increasing compliance with HOS regulations for all federally regulated drivers. Eliminating opportunities for truck drivers and carriers to violate HOS requirements will improve safety by reducing driver fatigue and providing better working conditions for drivers. A reduction in HOS violations following the ELD mandate in the United States (US) was confirmed by a recent study¹. However, this study also indicates that unsafe driving behaviours (defined as speeding, failing to obey traffic signals, following too closely, and improper or frequent lane changes) appear to have increased following the US ELD mandate. Drivers attempted to compensate for productivity losses that impacted their incomes, given that they now have no way to adjust HOS using paper logs - a concern BCTA believes may occur in and around BC Ferries terminals if commercial vehicles are faced with long wait times or unable to secure reservations.

¹ Balthrop, Andrew, Miller, Jason, and Scott, Alex. 2019. Did the Electronic Logging Device Mandate Reduce Accidents? (p.19-20.) <https://ssrn.com/abstract=3314308>

Based on the study, evidence from traffic violations issued to commercial vehicle drivers appears to support this assertion, particularly speeding violations. Speeding violations in the US have been shown as significant contributors to the increase in unsafe driving violations among all carriers, particularly after the strict ELD enforcement period began in April 2018: speeding increased by 31.0% for independent-operators; 15.9% for fleets with 2 to 6 trucks; 10.6% for fleets with 6 to 20 trucks; and 16.5% for fleets with 21 to 100 trucks.²

Additionally, the BC road transportation industry is both a significant contributor to the provincial economy and a critical service provider supporting the quality of life British Columbians expect. Provincially, our industry generated \$2.4 billion³ in revenue in 2019. Nationally, trucking moves approximately 92 percent of all consumer goods (by weight) and 46 percent of Canada's global trade.⁴ And, these figures only encompass "for-hire trucking" and exclude "private trucking" (i.e., companies that transport their own goods), which is roughly equivalent in size.

The percentage of consumer goods transported by truck on Vancouver Island and other communities serviced by BC Ferries is likely higher than 92 percent, as all goods must be transported by barge or ferry and then by truck to their final destination. BCTA members transporting goods on and to Vancouver Island depend on BC Ferries, which, as part of the highway system, is a vital component of the transportation network in BC.

The transportation link provided by BC Ferries will only become more important as demand for consumer goods on Vancouver Island increases along with population growth, and the road transportation industry continues to add goods movement capacity. From 2018-2019, Vancouver Island's population grew at the same rate as the Mainland/Southwest at 1.5 percent.⁵ According to ICBC data, there are already approximately 1,000 new heavy trucks being added to BC's fleet every year.

Another key priority for BCTA and BC's commercial road transportation sector is to reduce our carbon footprint without unduly affecting the affordability of goods for British Columbians. As noted above, trucking companies are critical service providers in BC; however, they also contribute to GHG emissions since heavy trucks must still depend on diesel fuel. This creates challenges for the Province in meeting legislated GHG emissions reduction targets. By 2040, for example, Metro Vancouver alone is forecasted to grow by approximately one million more

² Balthrop et al. (p. 28.)

³ Statistics Canada. Table 36-10-0402-01 Gross domestic product (GDP) at basic prices, by industry, provinces and territories (x 1,000,000)

⁴ Transport Canada, *Transportation in Canada 2019: Statistics Addendum*. Table EC5.

⁵ BC Stats, Municipal and sub provincial areas population, 2011 to 2019

residents,⁶ with related growth in demand for goods. In fact, over the past decade, there has been a 43 percent increase in heavy-duty transportation GHG emissions, largely attributed to the growth in BC's population by approximately 580,000 over that time and an increase in e-commerce.

For these reasons, BCTA urges BC Ferries, in the interest of safety, sustainability, and efficient goods movement, to prioritize the BC's commercial road transportation sector by providing:

- Priority access to the BC Ferries reservation system;
- Real-time sailing lower vehicle deck availability on BC Ferries site;
- Priority loading on the lower vehicle deck;
- Consideration be given to adding commercial only sailings (e.g., late evening/early morning); and
- Ensure commercial vehicles are a key consideration in BC Ferries vessel replacement/acquisition process, particularly in-regards to oversized loads, such as movement of manufactured homes, excavating equipment, etc.

BCTA looks forward to continued engagement and collaboration with BC Ferries on increasing the reliability of the reservation system and reducing wait times for commercial drivers. Please do not hesitate to contact me for clarification or further information.

Sincerely,



Dave Earle
President & CEO

cc. Captain Jamie Marshall, Vice President, Shipbuilding & Innovation, BC Ferries
Navin Sami, General Manager, Commercial Services Division, BC Ferries

⁶ Metro Vancouver, *Regional Growth Strategy - Metro Vancouver 2040: Shaping Our Future*, 2017.