

Honourable Rob Fleming
Minister of Transportation and Infrastructure

Via email: [REDACTED]

Dear Minister Fleming:

I am writing on behalf of the BC Trucking Association (BCTA) to express concern on the removal of the sectoral vaccination mandate exemption for the trucking industry. The planned cross-border vaccination mandate that takes effect on January 15, 2022, doesn't take into consideration the current realities of the stretched supply chains, the industry's shrinking labour force and its ability to service customers. We are asking for the Provincial Government and the Ministry of Transportation and Infrastructure to work with our sector to find solutions to help to mitigate the impact to the supply chain and economy.

We fully support the use of vaccines as the surest way to mitigate the risk of spreading COVID-19 and will continue to promote vaccines as a solution across our sector. However, given the timelines and supply chain realities we now face, which has been exacerbated by the recent floods, BCTA is encouraging all levels of government to work with our industry to provide, at a minimum, exemptions for specific job classes and select a feasible enforcement date for the vaccine mandate on cross-border truck drivers.

Trucking companies are critical service providers in BC and Canada. Provincially, the industry generated approximately \$2.3 billion in revenue in 2020,¹ transporting approximately 92% of all consumer goods (by weight) in Canada and 46% of our global trade.² With population growth and increasing demand for goods over the past five years, approximately 1,000 ICBC-insured trucks have been added to BC's roadways every year, not including additional trucks traveling or delivering goods in BC from other jurisdictions. Throughout the pandemic, both the federal and provincial governments have defined the trucking industry as an essential service and outlined how the industry will continue to play a critical and central role in COVID-19 response and recovery efforts.

We have joined our provincial association colleagues through the Canadian Trucking Alliance (CTA) to move the cross-border vaccination mandate conversation forward to federal ministers. CTA estimates that the proposed vaccination mandate for cross-border truck drivers would remove between 15,000 and 30,000 Canadian drivers from international supply chain. With the current supply chain under significant stress, losing any drivers moving Canada-United States trade would exacerbate the fragility of the supply chain. January 2022 is not the appropriate date to impose the mandate on the supply chain and economy. In addition, Federal Labour Minister O'Regan has very recently concluded abbreviated consultations on a federal vaccine mandate for all federally regulated employees, including truck drivers. Such a mandate would have a similar percentage impact on interprovincial trade as is predicted to international trade, but on

¹ Statistics Canada, *Gross domestic product (GDP) at basic prices, by industry, provinces and territories*. Table: 36-10-0402-01, 2020.

² Transport Canada, *Transportation in Canada 2019: Statistics Addendum*. Table EC4, 2019

a much larger scale. Interprovincial trucking is a key and critical element of our economy, and the expected loss of transportation service capacity will trigger significant ripple effects throughout the entire economy. It will make a critical driver supply issue markedly worse. While there is no available occupational data, member surveys indicate that vaccination rates in the interprovincial trucking sector are somewhat lower than the general population. Even at 85% vaccination, that 15% translates into a loss of at least 30,000 interprovincial drivers across Canada.

We recognize that the Government of Canada will likely act to implement some form of mandate in the federal sector, BCTA supports CTA's requests that at a minimum,

- All truck drivers be exempt from this mandate;
- All mechanics be exempt from this mandate;
- All workers who primarily work outdoors be exempt from this mandate.

In all three cases, these workers have limited contact with others and spend most of their work time alone and away from the base workplace. They also practice a much higher degree of social distancing than the average worker or are outdoors where the risk of transmission is lowest. While there would still be supply chain disruptions with the exemptions in place, we believe that with these three critical job-classes accommodated, a wide economic shock may be avoidable and that the supply chain could find ways to stabilize in time.

Should the federal government proceed with the mandate as currently proposed, our industry would require a minimum of 12 months to prepare. This time would allow us to continue to meaningfully engage with our current workforce to advance vaccination rates, and to recruit new vaccinated drivers to replace those who refuse to be vaccinated.

Minister, as noted, BCTA is entirely and completely supportive of vaccination and has worked closely with your government, our partners and members across the country to advance this critical initiative. We are now faced with decisions that provide no solutions, only trade-offs. Vaccination mandates in our sector will put the very fabric of supply chains under even greater stress than they already are. The limited public health improvements must be carefully weighed against the impact on our sector's ability to serve Canadians.

We ask for your office's assistance to ensure that the impact of these proposed, imminent mandates are raised, are fully understood, and are thoughtfully considered at the highest levels before decisions are made.

Should you have questions, comments or need any additional information, please do not hesitate to contact me directly at DaveE@bctrucking.com or at 604-888-5319, ext. 214.

Sincerely,



Dave Earle
President & CEO

Cc: Kathryn Krishna, Deputy Minister of Transportation and Infrastructure