

July 5, 2021

Samantha Eburne
Director, Commercial Vehicle Safety & Enforcement
Minister of Transportation and Infrastructure
Via email [REDACTED]

Re: Request for Mobile Commercial Vehicle Inspections on Trailers & Backhauling Opportunities on Chip Trailers to Support Reduction of Commercial Vehicle Emissions

Dear Ms. Eburne:

I am writing on behalf of the BC Trucking Association (BCTA) Sustainability Committee to request authorization from the Ministry of Transportation and Infrastructure (MoTI) on two actions that will support the reduction of commercial road transportation emissions:

- 1) **Mobile Trailer Inspections:** Provide the ability for designation inspection facilities (DIF) to conduct annual mobile commercial vehicle inspections (CVI) for trailers, including jeeps and boosters; and
- 2) **Backhauling Opportunities on Chip Trailers:** Amend the Commercial Transport Procedures Manual (CTPM) to allow chip trailers with the ability to back haul other commodities to do so, so long as they are in compliance with section 4.5.4 of the CTPM and are within legal axle weights.

Consistent with MoTI's efforts to reduce unnecessary transportation-related greenhouse gas (GHG) emissions, we are seeking these requests to help reduce our sector's emissions from transporting trailers to DIFs and to reduce empty mile loads, recognizing that on average, commercial vehicles emit up to 40 times the emissions to that of a passenger vehicle (based on long haul tractors).

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 approximately 1,200 trucking and motor coach fleets that operate over 13,000 commercial vehicles and employ over 26,000 British Columbians.

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, the industry generated approximately \$2.3 billion in revenue in 2020,¹ transporting approximately 92 percent of all consumer goods (by weight) in Canada and 49 percent of our global trade.² 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.

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

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

A 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. Currently, heavy-duty (HD) commercial vehicles are responsible for approximately 32 percent of GHG emissions from BC's road transportation sector (14 percent of BC's total GHG emission). According to ICBC data, there were 62,073 HD commercially ICBC insured vehicles in 2019, with an average model year of 2008.³ HD vehicles transport 91.7 percent of all consumer goods (by weight)⁴ in the province. With population growth and increasing demand for goods, HD vehicle emissions have increased by 43 percent over the past decade (2009 to 2018), and approximately 4,049 ICBC-insured medium & heavy duty (MHD) commercial vehicles are being added to BC's roadways every year, not including additional trucks traveling or delivering goods in BC from other jurisdictions.⁵

There are no simple solutions in reducing emissions from the heavy-duty commercial road transportation sector. Unlike passenger vehicles, which have a plethora of affordable, market-ready, zero and near-zero emission vehicle options, manufacturers of HD vehicles are in the very early stages of developing zero and near zero-emission options. It is critical that BC's transportation sector utilize all tools available to reduce its carbon footprint.

1) Request for Mobile Trailer Inspections

Based on long haul tractors, heavy duty vehicles transporting trailers to DIFs, on average, emit up to 40 times the emissions to that of a passenger vehicle. Furthermore, a limited number of trailers inspected require hoisting to remove wheels in order to complete an inspection, which means the majority of inspections can be completed at site by a professional mechanic and avoid unnecessary transportation-related emissions.

At present, MoTI has two pilot projects allowing for the ability to perform mobile inspections on trailers; one in the Peace Region, and one for a carrier in Kelowna. The terms of these pilot projects require that:

- On-site inspections must be performed by an authorized inspector (AI) employed by the DIF.
- The AI must be certified to inspect commercial vehicles and be endorsed for air brake inspections if the vehicle is so equipped.
- All required tools for the inspection of the vehicles must be available at the inspection location.
- Inspection must be conducted:
 - During daylight hours;
 - On clear and dry days that are subject to no inclement weather conditions as determined by the DIF; and
 - Only at the approved on-site location.
- Inspections must be conducted in accordance with Division 25 of the Motor Vehicle Act Regulations.
- The inspected vehicle must meet all standards contained in the applicable vehicle inspection manual selection prior to being issued a certificate of approval (decal).
- Inspection of the vehicle is determined on mutual agreement between the carrier and the DIF.

³ Insurance Corporation of BC. *Quick Stats* (December 2017).

⁴ Transport Canada, 2020, *Transportation in Canada 2019: Statistical Addendum*. Table EC4.

⁵ Insurance Corporation of BC. *Quick Stats* (December 2018).

To reduce BC's HD emissions, BCTA is requesting that MoTI support the BCTA Sustainability Committee's request for the ability for DIFs to provide annual mobile CVIs for trailers, including jeeps and boosters. Specifically, the ask is to adopt the same procedure to that of Ontario where mobile inspections by DIFs can take place so long as they "have sufficient internal space or external hard standing area for the inspection of at least one vehicle of the class that the licensee is licensed to inspect."

2) Request for Backhauling Opportunities on Chip Trailers

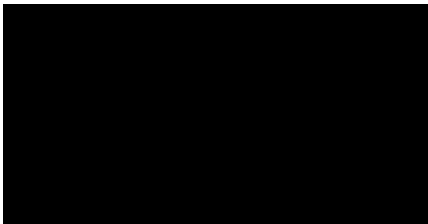
In 2009, Commercial Vehicle Safety Enforcement (CVSE) issued a new permit that allowed wood chips operators to use extended Length Super B-trains with an overall length up to a maximum 27.5 m, a maximum overall box length up to 23 m, and a maximum overall height up to 4.45 m to haul low bulk density wood chips and mill processed wood residuals. As wood chips and mill processed wood residuals are extremely dry and light weight, this extended height and width permit for Super B-trains continues to promote the efficient movement of goods and reduce industry GHG emissions.

At present, only Super B-trains are permitted to back haul wood chips and residuals. Improving load factors for all wood chip trailers, so long if they meet overall length and width configurations and legal axle weight targets, is the most efficient way to promote economic development and reduce transportation related GHG emissions through better fuel efficiency and productivity.

In the interest of increasing truck utilization and payload capacity while reducing carbon emissions produced by empty kilometres on the road, we request that CVSE amend the circular to provide the ability for all chip trailers to backhaul so long as the vehicle maintains compliance with overall axle weights and vehicle configurations. Reducing GHG emissions is a priority of this industry, and we ask that government also make it a priority to provide opportunities for the industry to do its part.

In the shared interest of addressing climate change, we look forward to working with MoTI on the ability to perform annual mobile commercial vehicle inspections on trailers. If you have questions or comments, please do not hesitate to contact me at DaveE@bctrucking.com or 604-888-5319, ext. 214.

Sincerely,



Dave Earle
President and CEO

cc.

Steve Haywood, Executive Director, CVSE
Nicole Hilborne, Manager Commercial Transport, CVSE
Geoff Ford, Manager, Inspections and Standards, CVSE