



**2019 Pre-budget Consultations
September 2018**

Recommendation 1:

The government change the NOC for long haul truck drivers from NOC C to NOC B. Moving the classification from a low skilled worker to a skilled worker

Recommendation 2:

The government expedite the Temporary Foreign Workers Program to assist the industry in dealing with the truck driver shortage, which is reaching a crisis point

Recommendation 3:

The government look at making modifications to the Atlantic Immigration Pilot Program to further increase the efficiency of the process

Recommendation 4:

The government allow the spouse of the temporary foreign worker to obtain an open work visa at the same time as the work permit for the temporary foreign worker (TFW) is issued

Bulk Carriers (P.E.I.) Limited

Bulk Carriers (P.E.I.) Limited was founded in 1973 by its current president/owner, Jack Kelly. To this day, we remain a family business with Jack and his two sons filling key positions within the company.

We are the largest Prince Edward Island based Transportation employer and are one of the larger ones within Atlantic Canada. We have experienced steady growth over the years, and continue to grow.

We are projecting growth into the future, however, there are many constraints. One of the largest constraints is manpower - drivers to fill the seats.

We are a huge local and regional contributor for economy, community and feel that we are doing our part in these contributions.

Long haul truck driving does not seem to be what local drivers are looking for anymore. Today's demographic is looking for long haul wages, but be home every night. This is just not the reality for a carrier based out of Atlantic Canada. We are looking for high skill, dedicated, and safe long haul truck drivers, and this profile is getting harder to find in our local economy and in economies along our Canadian routes.

There needs to be increased training and awareness about this industry and it needs to start earlier. The stigma of this vocation is not a true reflection of the position (using the categorization of 'low skill worker' in NOC C does not help). Youth need to be made aware that this is a skilled career choice, one that will provide well when they get to a point of needing to support a family.

The Atlantic Pilot Program is a good program, with a few faults. One of the faults is the number of 'slots' that are available to Prince Edward Island. In 2018, the Island shut down the program in the end of May after all of the slots allocated by the federal government to the province were fulfilled. The only opportunity for more was to apply to other provinces to see if they wished to transfer any of their unused slots to Prince Edward Island.

The entire Canadian Economy is reliant on road transport to drive it. Without road transport, it becomes impossible to get consumers products to market, this causes costs to rise more than they already are.

More needs to be done to retain the temporary foreign workers and their families within the Province of PEI.

There needs to be immediate solutions and a strong immediate focus on the industry by the federal government.

Reclassification of NOC level for Truck Drivers

Professional truck drivers are required to obtain licensing in order to complete their job. This licensing, in Prince Edward Island, requires them to study, complete and pass a written test understanding all of the components and various responsibilities of the components of the air brake systems. Failure to obtain a passing grade will require a re-write and subsequent failures could exclude the individual from re-writing for an extended period of time.

Once the air brake written test is completed, the driver is then required to complete a Class 1 Over the Road Test. This not only includes testing of the driver's ability to safely operate a Class 1 vehicle and obey all traffic laws, but it also requires the driver to successfully complete a 'circle check' which is the initial walk around required to be done once every 24 hours while the driver is on the road. Failure of the 'circle check' will prohibit the driver from being able to complete the road evaluation portion and will require the driver to re-apply for the entire process. Subsequent failures could exclude the individual from re-writing for an extended period of time.

The above testing is just the initial requirements and duties of the professional truck driver. In addition, some of the other items they must continually be tested on or upgrade their skills on are (but not limited to):

- Drug and Alcohol Testing (pre-employment and randomly for as long as they are employed)
- Physical Examinations on a continual basis as per requirements of the licensing jurisdiction
- Various certifications for being able to enter customers facilities - ensuring that customer Standard Operating Procedures are followed and not strayed from
- Cross border paperwork is at an ever increasing high as it relates to attention to detail - failure to report or complete properly can result in penalties in excess of \$10,000 per offense.
- Drivers must have knowledge of product handling, determining when to 'pulp' a load before it goes on the trailer for delivery, and verifying the proper loading and unloading procedures are carried out to ensure the integrity of the load.
- Drivers now must be trained in the new Food Safety Modernization Act, which allows them to carry food grade products across the international border. Each driver must be certified in the processes and must maintain that certification on an ongoing basis.

According to the Government of Canada - Immigration Refugee Citizenship (IRCC) website (<https://www.canada.ca/en/immigration-refugees-citizenship/services/immigrate-canada/express-entry/eligibility/find-national-occupation-code.html>),

Skill Level C: intermediate jobs that usually call for high school and/or job-specific training, such as:

- long-haul truck drivers
- food and beverage servers
- airline ticket agents
- hotel front desk clerk
- pet groomers

And, according to the same website

(<https://www.canada.ca/en/immigration-refugees-citizenship/services/immigrate-canada/express-entry/eligibility/find-national-occupation-code.html>),

Skill Level B: technical jobs and skilled trades that usually call for a college diploma or training as an apprentice, such as:

- chefs
- plumbers
- electricians
- butchers, meat-cutters - retail and wholesale

A very strong argument exists for the reclassification of Long Haul Truck Drivers to be moved from Skill Level C to Skill Level B on the basis that they require initial licensing training and continual professional training and certifications in order to retain their level of license. Failure to comply with some aspects will cause the license to be revoked.

Moving the Long Haul Truck Driver from NOC C to NOC B would remove the requirement of the LMIA and allow greater recognition to the profession and open up additional opportunities for employers to seek applicants from outside of Canada.

Expedite Changes to TFWP

The application process for a trucking company to the Temporary Foreign Worker Program is the same process every time with a few modifications that may be required to the transition plan.

The workers are paid the same, the fundamental strategies and objectives of the company are the same from application to application.

Currently, the Labour Market Impact Assessment applications are sent to a central office and from there are assigned through some system to individual assessment officers.

It is our proposal that a specific, or a group of specific individuals review and process these applications on a consistent basis as opposed to a person who is totally unfamiliar with the company or the industry.

By having individuals who are familiar with the operations of the applicant company, this could greatly reduce the processing times. Currently, the fee is taken within 5 working days of the application being submitted and we have never received our first response before 38 days after application with final approval generally at the 40-45 days after application.

Not knowing how long it will be to process forces companies to apply early, in order to allow for any delays in the process times. This is extremely inefficient for the companies and causes additional questions when the application comes in so soon after the previous application.

Initiate Changes to the Atlantic Immigration Pilot Program to Increase Efficiencies

The Atlantic Immigration Pilot Program was designed to welcome additional newcomers to the Atlantic Canada region to fill the needs of local employers and communities.

The three-year pilot program allows designated local employers to identify, recruit and retain global talent. The program also has the goals of supporting population growth, developing a skilled workforce, and increasing employment rates in the region.

Applicants who apply and are accepted under this program will be placed into an expedited processing stream to obtain their Permanent Residency.

This expedited stream, however, has several bottlenecks which should be removed to ensure an easy and logical flow of applications.

One of the largest bottlenecks to the program that we are aware of is the fact that the individual, once approved for the program, must apply to their local Canadian Embassy (based on their country of permanent residence) in order to obtain the temporary work permit to enter Canada and work. If the individual is already in the country, this would require them to send the documents overseas and be subject to the processing times of their local embassies as opposed to obtaining such paperwork at a local port or entry or 'flagpoling' at the border.

One other bottleneck to the process is the amount of time that it takes to have all the applicants diplomas and certificates validated under Canadian academic standards. This process can sometimes take 4-6 weeks to complete.

What these two bottlenecks mean to the applicant are 8-12 weeks of waiting before they are able to work.

There needs to be some changes to get this more streamlined and efficient.

Allow Spouse of TFW to obtain Work Permit immediately

The purpose of recruitment of temporary foreign workers in the long haul trucking industry is two fold.

1. It fulfils a need in the industry for drivers - as previously established shortages are being experienced and will continue to be experienced.
2. It increases the population base in Prince Edward Island and therefore increases the tax dollars received and spent.

When a Temporary Foreign Worker (TFW) arrives in Canada, they are presented with their Work Permit at the Port of Entry. This work permit is generally issued to a specific company. In about 50% of the cases, the TFW will bring their family with them when they first arrive. Currently, if they arrive at the same time, they are issued visitor visas which are tied to their spouse's work permit and therefore carry a 2 year expiry date.

The life of the spouse of a long haul truck driver can be hard, and that hardship can be compounded by the fact that when the spouse comes, they are not able to work until the TFW has been nominated by the Province for Permanent Residency. Then, and only then, can the TFW apply to CIC in Vegreville Alberta to obtain an open work permit for their spouse. Currently, until this application happens, the spouse sits at home and is unable to work - increasing dissatisfaction and boredom.

Retention rates in Prince Edward Island could increase dramatically if the spouse was able to work immediately upon landing instead of having to sit at home and do nothing for the first 7 months. There is at least one Province in Canada that is able to issue the spouse an open work permit immediately, and that ability has to be offered in Prince Edward Island as well in order to equal the playing field and ensure greater success in retention of the immigrant families in Prince Edward Island.