



Ministry of
Transportation
and Infrastructure

Commercial Vehicle Engagement What We Heard Report



Final Version

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Province of British Columbia

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Executive Summary

Background

In June 2018, the Ministry of Transportation and Infrastructure (MoTI) requested input and engagement from the public and industry stakeholders regarding proposed new chain-up regulations and fines.

In recent years, a growing number of extreme weather events have resulted in an increase in traffic incidents on interior highways, particularly involving commercial vehicles that lack adequate tire chains. These incidents can lead to complete highway closures of various durations, which impact communities and the movement of commercial goods. The proposed regulations are part of a series of measures aimed at improving winter-driving reliability and safety and reducing incidents and closures on BC highways.

Methodology and Survey Respondents

Prior to starting the engagement process, the ministry undertook a comprehensive technical review. This review included a thorough analysis of other North American jurisdictions (including all Canadian provinces and nine comparable American states), engagement with industry experts as well as ministry operations and CVSE staff.

The online survey was available from June 1st to 22nd, 2018 and received 887 completed responses. Respondents were prompted to provide a comment only if they disagreed with the question. This means that the comments summarized in this report only reflect an opposing viewpoint. Respondents provided 938 comments. Most of the survey respondents were from the trucking industry, with the majority being company drivers (30%), owner-operators (29%), and company owners (17%).

What We Heard

The industry engagement and feedback process revealed broad support for the enhancement of chain-up regulations. The survey results indicate that:

- Over 70% of respondents approved of enhancements to the quality of, and requirements for, traction devices.
- Over 90% of those surveyed said they are already compliant with the regulations.
- Over 80% said they have the tools and training in place to implement the proposed regulations.
- Over 65% approved of a prescriptive approach to the quality and placement of chains.
- The ministry's approach to enhance fines for non-compliance was supported by 77% of those surveyed.

There was a significant number of written comments, with many respondents providing suggestions and input on the technical and operational details of the regulations. Respondents identified training and highway maintenance as secondary themes that support the intent of the regulations.

What's Next

The objective of the industry engagement process was to collect feedback so that MoTI can ensure the changes put forward will be successful. The information collected has been analysed, and where feasible, incorporated into the final regulation and fine structure that will be in place this winter (2018/2019).

MoTI will continue to monitor the effectiveness of the enhancements and may consider suggestions received for future adjustments.

Introduction

In recent years, a growing number of extreme weather events have resulted in an increased frequency of traffic incidents and full closures on interior highways, particularly involving commercial vehicles. In response to the data, and concern brought forward by those who rely on interior highways, the Ministry of Transportation and Infrastructure (MoTI) is enhancing commercial vehicle chain-up regulations and increasing associated fines for non-compliance. These enhancements will make interior highways safer and more reliable for all road users during the winter months.

Recognizing that these changes will impact the commercial trucking industry, MoTI requested input from industry stakeholders regarding the proposed new chain-up regulations and fines. MoTI was specifically seeking technical feedback on the proposed regulations to ensure all aspects of the proposed changes have been considered, prior to implementation.

The proposed regulations would:

- Specify the quality of chain required;
- Exclude textile tire covers as an acceptable traction device;
- Require commercial vehicles under 11,794kg to have winter tires or carry chains;
- Require all vehicles over 11,794kg to carry chains;
- Specify the number and placement of chains;
- Increase fines for non-compliance; and
- Allow the regulations to be more easily updated to respond to industry changes.

This report summarizes the feedback received through a survey of industry and public stakeholders.

Methodology

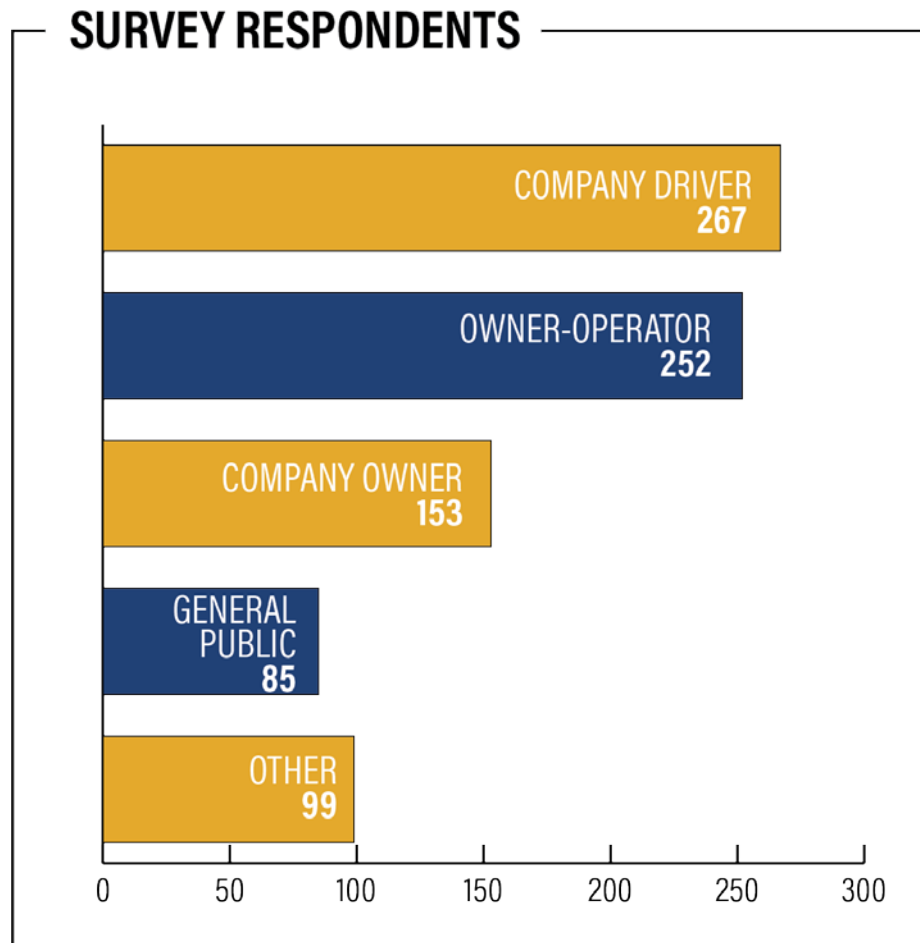
Ministry staff conducted a thorough review of other North American jurisdictions, including all other Canadian provinces, and nine comparable American states, before starting the engagement process.

The online survey was available from June 1st to 22nd, 2018 and received 887 completed responses.

Responses where no answer was provided were removed from the percentage calculation. Respondents were prompted to provide a comment only if they disagreed with the question. This means that all comments summarized in this report reflect an opposing viewpoint. The survey yielded 938 comments.

Survey Respondents

Most of the survey respondents were from the trucking industry with the majority being company drivers (31%), owner-operators (29%), and company owners (18%).



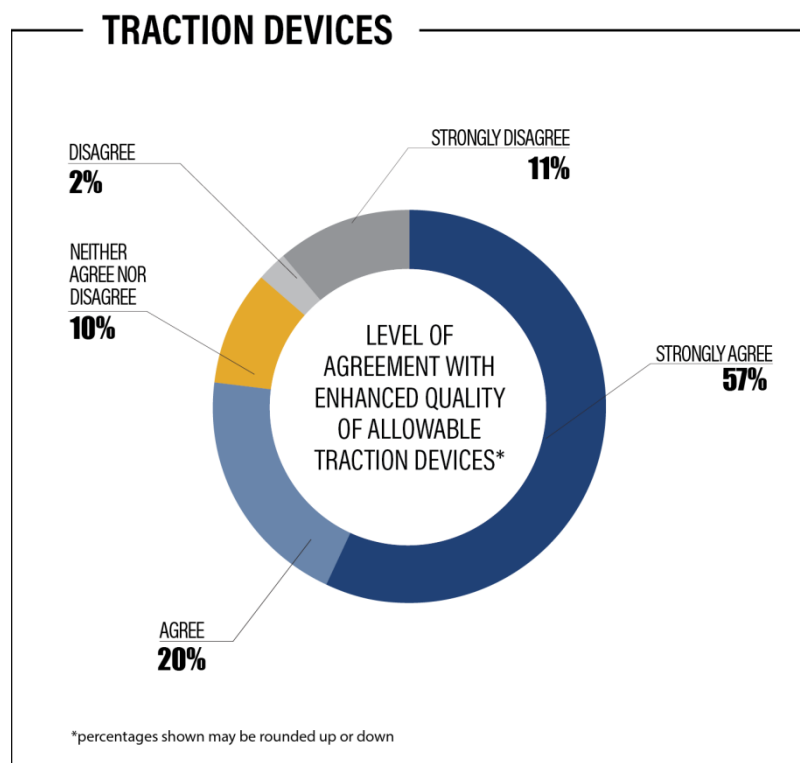
What We Heard

The following section provides an overview of the responses and key themes for each of the questions. The results to each question are presented with the level of agreement (by percentage) and a summary of the key themes and supporting statements where the survey gathered comments.

Section 1 – Traction Devices

Q1 – What is your level of agreement with the ministry’s approach to enhancing the quality of allowable traction devices?

There was broad agreement with enhancing the quality of the allowable traction devices, with 77% of respondents saying they strongly agree (57%) or agree (20%) with the ministry’s approach.

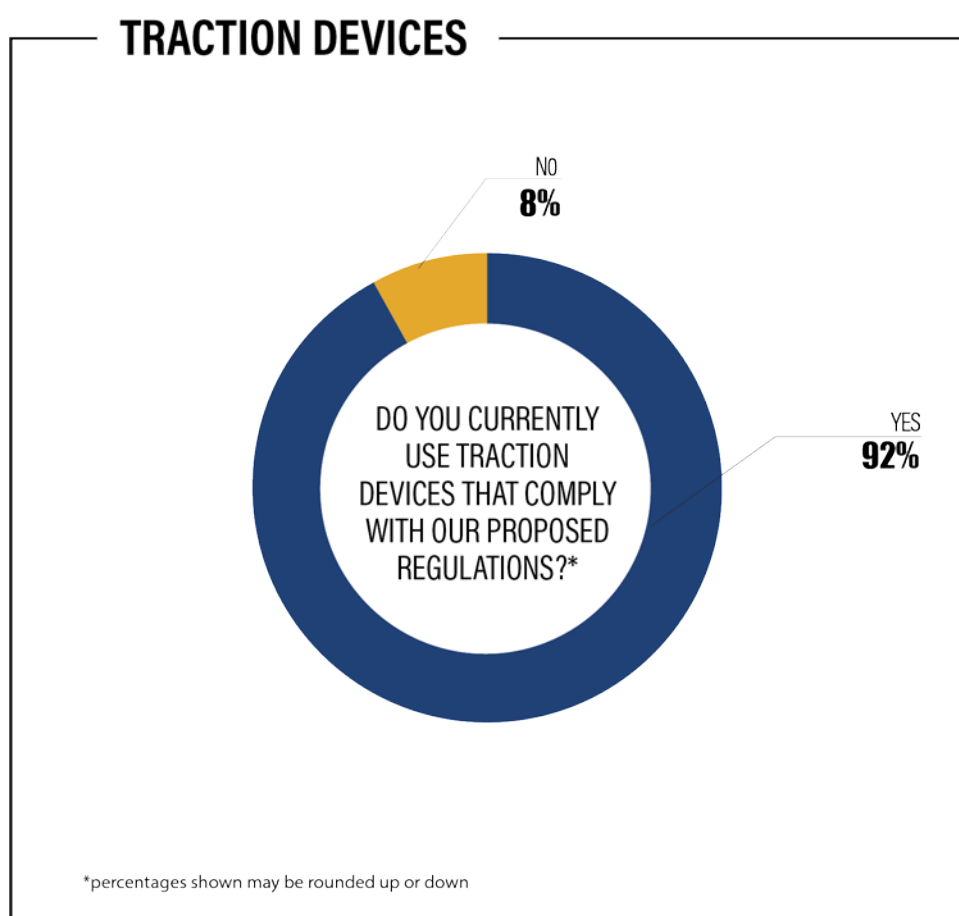


Comment Theme	Comment Summary	Number of Mentions
Textile Covers	Respondents spoke in favour of the use of textile tire covers and cited their ease of use and low weight compared to chains.	47
Maintenance	The commenters suggested that increased highway maintenance would reduce the need for chains.	10
Training	The comments identified the importance of training and education regarding the proper use of traction devices.	6

Q2 – Do you currently use traction devices that comply with our proposed regulations?

92% of survey respondents reported that they are already using traction devices that would comply with the proposed regulations.

8% of respondents do not currently use traction devices that comply with proposed regulations.

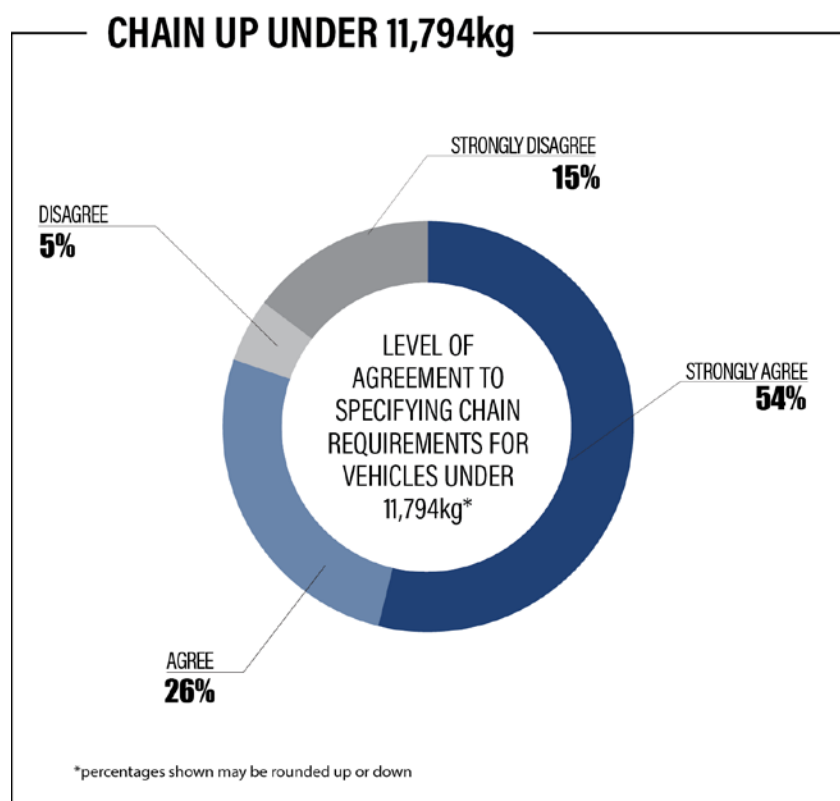


Section 2 – Chain up Requirements for vehicles under 11,794kg

Q1 – What is your level of agreement with the ministry's approach to specifying chain requirements for vehicles under 11,794kg?

80% of survey respondents indicated that they strongly agreed (54%) or agreed (26%) with the ministry's approach to specifying requirements for vehicles under 11,794 kg.

15% of respondents strongly disagree, 5% disagree.

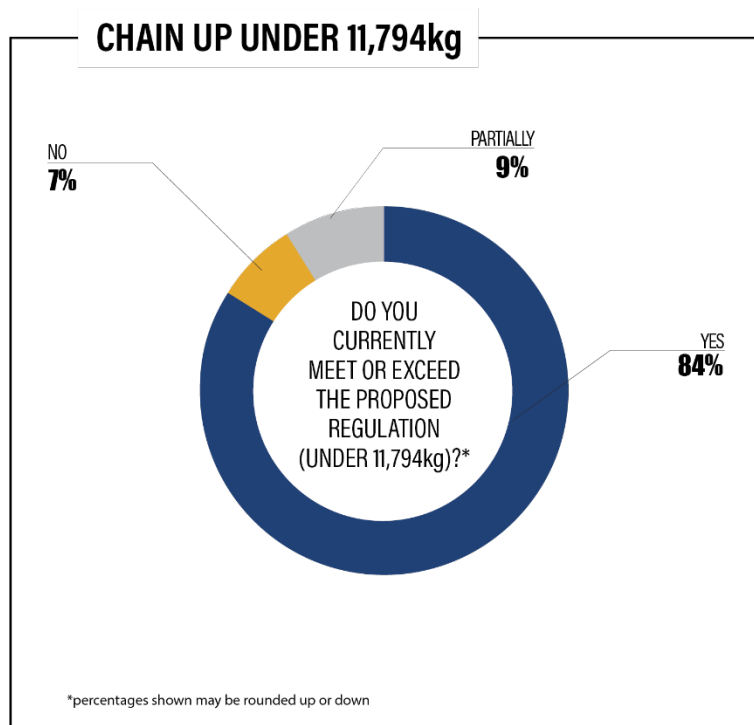


Comment Theme	Comment Summary	Number of Mentions
Expand Regulations	Comments called for expanding the regulations even further, including: mandatory winter tires, chain regulations on all commercial vehicles, and chain requirements for all wheels.	40
Winter Tires	Respondents offered differing opinions on whether winter tires are adequate for traction but most felt winter tires should be used on all tires and all vehicles.	27
Textile Tire Covers	Comments supported the use of textile tire covers and suggested they should be allowed.	9

Q2 – If you operate a vehicle(s) under 11,794kg, do you currently meet or exceed our proposed legislation?

84% of respondents indicated they already meet or exceed the proposed regulation if they currently operate a vehicle under 11,794 kg.

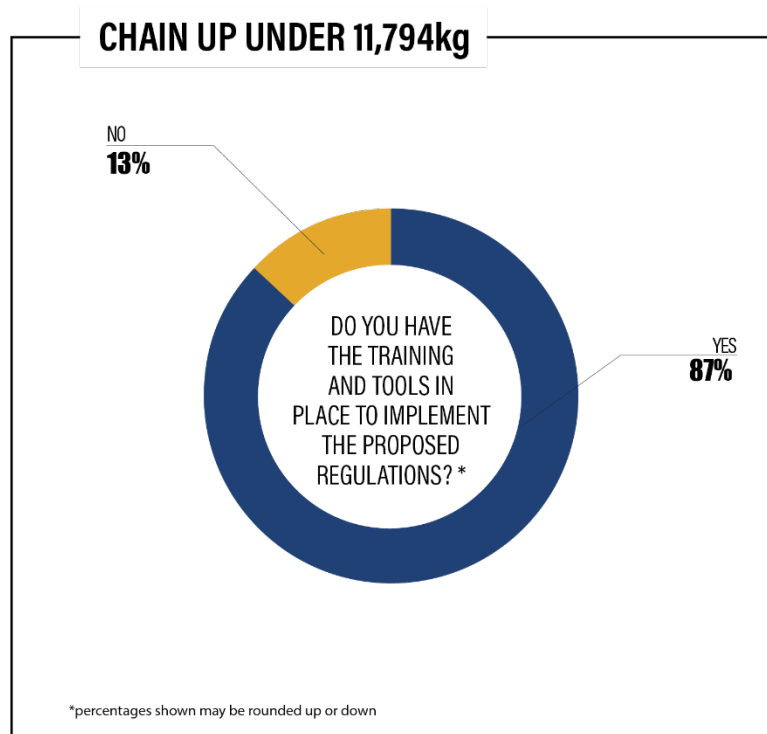
9% partially meet the proposed regulation, and 7% stated that they do not currently meet the proposed regulation.



Q3 – Do you already have the training and tools in place to be able to implement the proposed regulations?

87% said that they currently have the tools in place to implement the proposed regulations.

13% of respondents do not have the tools in place to meet the proposed regulations.

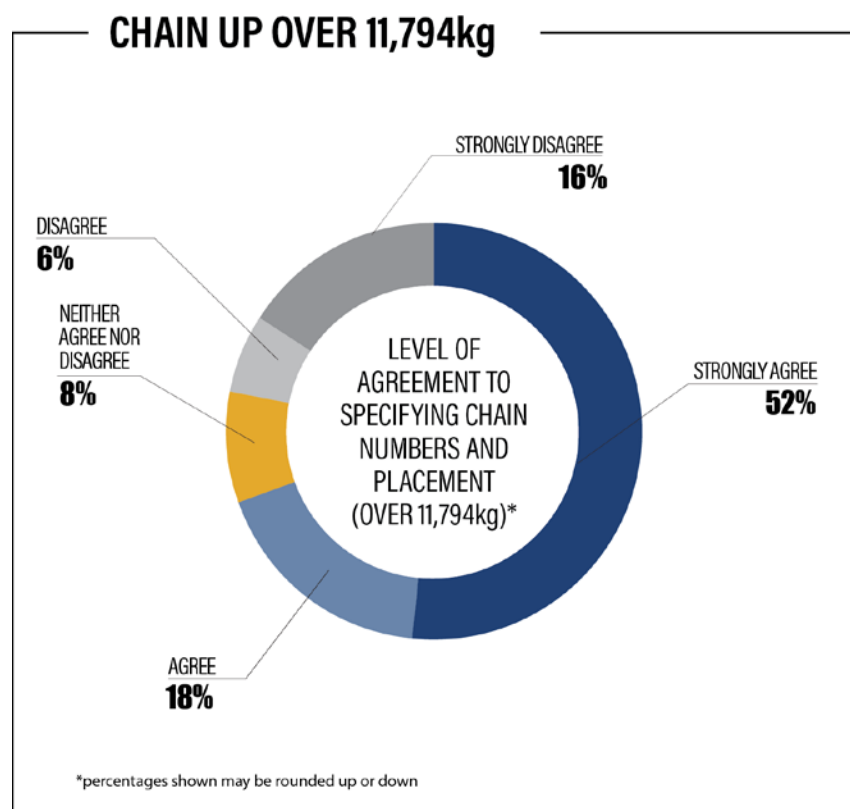


Section 3 – Chain up Requirements for vehicles over 11,794kg

Q1 – What is your level of agreement with the ministry’s approach to specifying chain numbers and placement for vehicles over 11,794kg?

70% of respondents either strongly agree (52%) or agree (18%) with the approach to specifying chain numbers and placement for vehicles over 11,794 kg.

16% strongly disagree, 6% disagree, and 8% neither agree or disagree.



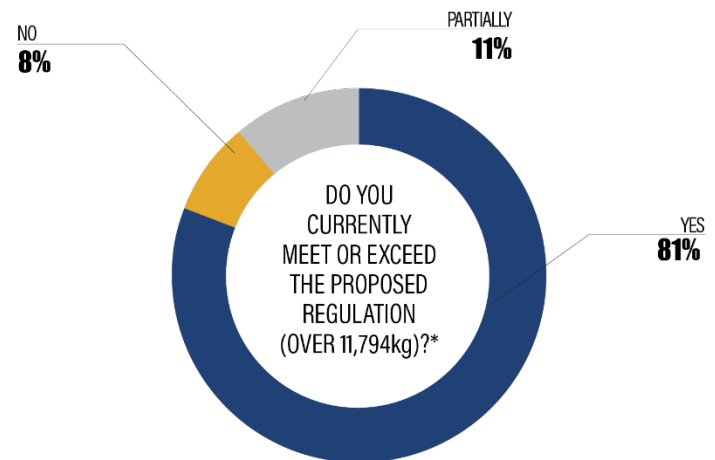
Comment Theme	Comment Summary	Number of Mentions
Single/Triple	The comments in this theme were split on the merits of the use of single chain vs triple chains. Some felt that single chains were adequate in some situations; others felt that only triples should be used.	37
Technical	The comments offered differing opinions and anecdotes regarding the technical specifics of the number and placement of chains.	36
Expand Regulations	The respondents called for an expansion of the regulations, including: chains on all drive tires, on rear trailer tires, and all 8 drive tires on a Super B.	14

Q2 – If you operate a vehicle(s) over 11,794kg, do you currently meet the proposed regulations as a standard practice?

81% of respondents stated that they currently meet the proposed regulation as a standard practice.

11% of respondents partially meet the proposed regulation as standard practice, and 8% do not currently meet the proposed regulation as a standard practice.

CHAIN UP OVER 11,794kg



*percentages shown may be rounded up or down

Q3 – Do you already have the training and tools in place to be able to implement the proposed regulations?

89% of respondents said they have the training and tools already in place to implement the proposed regulation.

11% of respondents do not have the training and tools in place to implement the proposed regulations.

CHAIN UP OVER 11,794kg



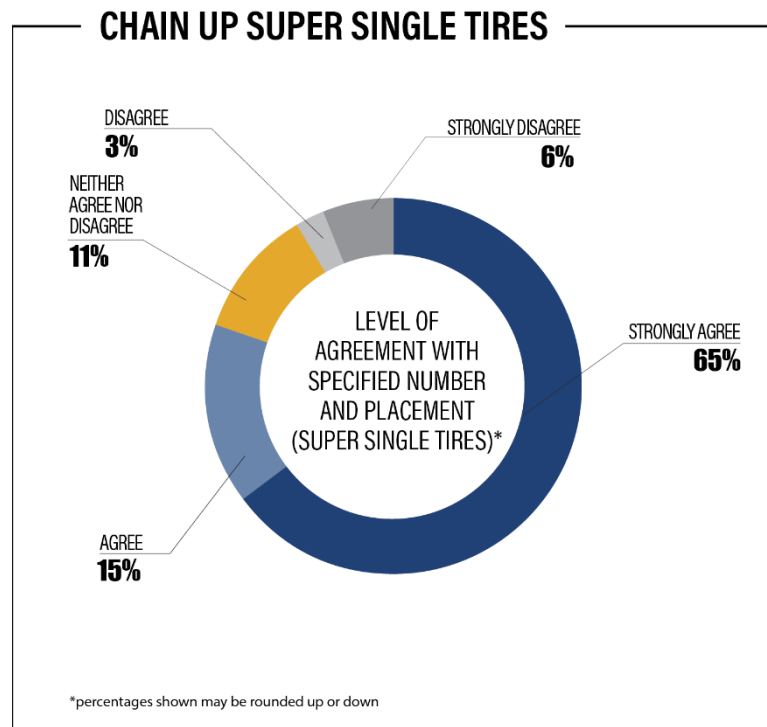
*percentages shown may be rounded up or down

Section 4 – Chain-up Requirements for Super Single Tires

Q1 – What is your level of agreement with the ministry’s approach to specifying chain numbers and placement for Super Single Tires?

The majority of respondents (80%) said they either strongly agree (65%) or agree (15%) with the ministry’s approach for specifying chain numbers and placement for Super Single Tires.

11% neither agree/disagree with the proposed approach, 6% strongly disagree, and 3% disagree.



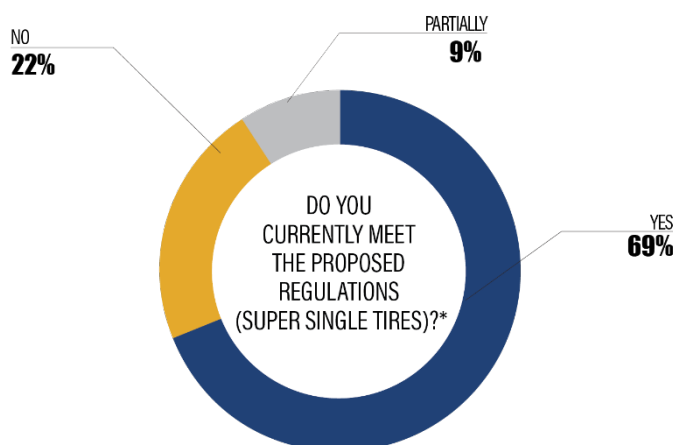
Comment Theme	Comment Summary	Number of Mentions
Technical Criteria	The comments reflected a difference of opinion regarding the placement and number of chains when using super single tires. Comments ranged from the opinion that one set of chains would be adequate to those who felt all four tires should be chained.	21
Textile Tire Covers	The comments suggested the use of textile tire covers should be included.	3
Trailers Too	Comments reflected the opinion that traction devices should also be used on trailers.	3

Q2 – If you operate a vehicle over 11,794kg, with Super Single Tires, do you currently meet the proposed regulation as a standard practice?

78% of respondents either currently meet (69%) or partially (9%) meet the proposed regulation as a standard practice.

22% do not currently meet the proposed regulation as a standard practice.

CHAIN UP SUPER SINGLE TIRES



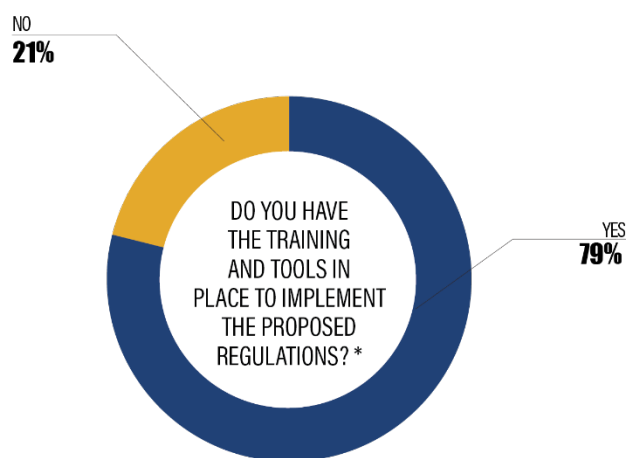
*percentages shown may be rounded up or down

Q3 – Do you already have the training and tools in place to be able to meet the proposed regulations?

79% of survey respondents said they currently have the training and tools in place to be able to meet the proposed regulations as a standard practice.

21% of respondents do not have the training and tools in place to be able to meet the proposed regulations.

CHAIN UP SUPER SINGLE TIRES



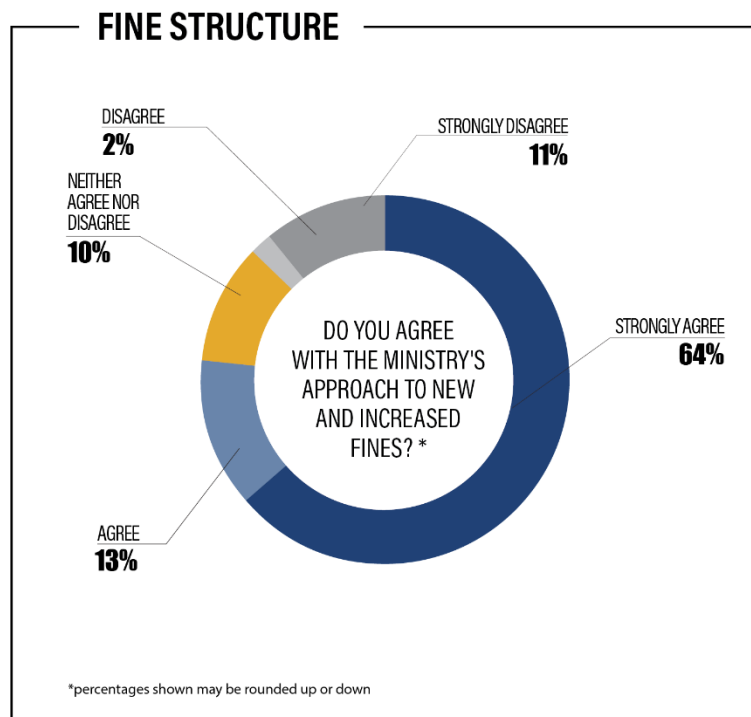
*percentages shown may be rounded up or down

Section 5 – Fine Structure

Q1 – Do you agree with the ministry’s approach to creating new and increased fines?

77% of respondents either strongly agree (64%) or agree (13%) with the ministry’s approach to new and increased fines.

11% strongly disagree, 2% disagree, and 10% of respondents neither agree/disagree with the ministry’s approach.



Comment Theme	Comment Summary	Number of Mentions
Enforcement	Respondents suggested stronger enforcement measures including: larger and/or escalating fines, additional fines for other infractions, and adding demerit points to the fine structure.	23
Maintenance	The commenters highlighted the role that road maintenance plays in traction.	20
Training	Respondents pointed out the importance of training in the proper use of chains and offered suggestions including: mandatory training tied to the driver’s licence and education programs.	16

Additional Information

Q1 – Is there anything else the ministry should know, so that we can successfully implement the proposed new chain regulations?

There were over 450 comments to this open-ended question. The majority of the comments were captured in four main themes.

Comment Theme	Comment Summary	Number of Mentions
Training	Respondents underscored the importance of initial and ongoing chain-up procedures training for commercial drivers.	112
Enforcement	Most of the comments in this theme called for stricter and additional enforcement, and higher fines. 25% of the comments were in direct support of larger fines for offenders.	100
Technical Criteria	The commenters offered a broad range of opinion and discussion regarding the technical criteria of the regulations, including, number and placement options, vehicle specific requirements, and the efficacy of single chains.	75
Maintenance	The respondents noted the important role played by the contracted maintenance providers regarding winter driving conditions.	67
Other themes (5+ mentions)	Textile Covers	20
	Chain-up areas	17
	Chain-up signs	15
	General comment of support	12
	Winter tires	6
	Singles vs Triples	5

Survey Findings: Key Considerations

The industry engagement and feedback process revealed broad support for the enhancement of chain-up regulations. The survey results indicate that:

- Over 70% of respondents approved of enhancements to the quality of, and requirements for, traction devices.
- Over 90% of those surveyed said they are already compliant with the regulations.
- 80% said they have the tools and training in place to implement the proposed regulations.
- Over 65% approved of a prescriptive approach to the quality and placement of chains.
- The ministry's approach to fines for non-compliance was supported by 77% of those surveyed.

There was a significant number of written comments, with many respondents providing suggestions and input on the technical and operational details of the regulations. Respondents identified training and maintenance as secondary themes that support the intent of the regulations.

The dominant comment themes (Technical/Operations) provided insightful feedback on the technical application of the proposed regulations. The secondary themes (Training/Maintenance) support the interconnected nature of the Ministry's approach to improving winter-driving safety on BC highways.

What's Next

The objective of the industry engagement process was to collect feedback so that MoTI can ensure the changes put forward will be successful. The information collected has been analysed, and where feasible, incorporated into the final regulation and fine structure that will be in place this winter (2018/2019).

MoTI will continue to monitor the effectiveness of the enhancements and may consider suggestions received for future adjustments.

Appendix A – Comment Theme Summary

There were six opportunities throughout the survey to provide written comments. Over 900 comments were received in the following broad themes:

Theme	Definition	Total*
Technical	Suggestions or comments regarding technical aspects of the regulations.	340
Operations	Comments regarding highway operations including chain-up areas, chain-up signage and enforcement.	164
Training	Comments regarding training and education to improve winter driving and the use of chains.	143
Maintenance	Suggestions and comments about how winter highway maintenance is a factor.	117
Enhancement (More)	Suggestions to expand or enhance the proposed regulations.	66
Disagree	General comments of disagreement without technical qualifiers.	44
Support	General comments of support for the proposed regulations.	18
Cost	Concerns about the cost implications for drivers/owners.	6
Other	Off topic or uncategorizable comments.	66

** **Please note:** Each written comment is categorized into one or more themes. Accordingly, the number of comments listed under each theme will total to more than the number of submitted comments.*

Appendix B – Comment Sub-Theme Summary

Over 20 subthemes emerged in the comments. There were three significant sub-themes in each of the top two dominant comment themes (Technical and Operations).

Theme	Sub-Theme	Total
Technical	Training – Comments regarding the desire for more education and training in the use of chains were the most common response.	143
	Technical Criteria – Respondents offered comment and suggestions on alternate approaches and anecdotal experience.	137
	Textile Tire Covers – There were a significant number of comments regarding the use of textile tire covers. Most of the 84 respondents spoke in favour of their use.	84
Operations	Enforcement – Respondents' comments on the perceived need for more enforcement of the regulations.	110
	Chain-up areas – Comments about expanding and improving the chain-up areas were a subtheme.	18
	Chain-up signs – A few respondents offered comments and suggestions to improve the use of chain-up signs.	18