

September 30, 2020

Honourable Jason Kenney
Premier of Alberta
Office of the Premier
307 Legislature Building
10800-97 AVE
Edmonton, AB T5K 2B6
Via email: premier@gov.ab.ca

Re: Update on the implementation of MELT for farmers and farm workers

Dear Premier Kenney:

On behalf of Alberta's farmers and ranchers, we would like to thank the Government of Alberta for the agriculture extension to comply with Mandatory Entry Level Training (MELT) for Class 1 driver's licences. However, the far-reaching disruption caused by the COVID-19 pandemic has diminished the benefit of the extension period. As the November 30, 2020 deadline to apply for the extension approaches, we want to update you on a number of concerns related to MELT that not only impact farmers and farm workers, but many other industries and Albertans.

Significant labour shortages – The trucking industry has been plagued with driver shortages for years and Canada is projected to be short 25,000 truck drivers as early as 2023¹. Disruptions to logistics are concerning for the agricultural sector's ability to unleash its export potential², integrated supply chains, and the province's relaunch strategy. Driver shortages also make it challenging for farmers to hire and retain their Class 1 drivers, especially when Alberta's economy is recovering. While farmers were able to hire some unemployed skilled drivers for this year's growing season, a struggling economy is an undesirable on-farm labour strategy. It is encouraging to hear that The Skills for Jobs Task Force included representatives from the transportation sector in its engagement with industry roundtables that explored education and training with labour market demand. We look forward to reviewing the recommendations once the final report is released.

Significant training and testing delays – Long before the pandemic suspended driver training and road tests for months in March 2020, there were backlogs across the province due to the switch from a private to a public system and the adjustment to the new MELT program. Farmers were frustrated with long wait times to book road tests, the limited number of appointments within their local areas, and the limited openings and waitlists at driver training schools. Even though Alberta is a leader in its relaunch efforts the backlog for road tests is expected to continue well into the fall because the pace is slower to maintain health and safety protocols and train more examiners.

¹ https://truckinghr.com/wp-content/uploads/2020/03/THRC-Labour-Market-Information-Report_English-version.pdf

² <https://www.budget.gc.ca/aceg-ccce/pdf/key-sectors-secteurs-cles-eng.pdf>

The continued uncertainty around COVID-19 and the rise in new cases is concerning for agriculture extension drivers who could lose their Class 1 licence on March 1, 2021 because they haven't been able to book appointments to challenge the MELT requirements. We appreciate the ongoing work of the Ministry of Transportation on this file and the ramping up of Class 1 road tests this fall. We ask that Class 1 road testing remain a priority in rural locations to accommodate the agriculture extension drivers who are busy with harvest across the province. We are willing to help communicate information about testing locations and dates to our farmers to help reduce any disparity between supply and demand for testing.

Significant costs for driver training – The Class 1 MELT tuition is capped at \$10,000, but there are additional costs for medicals, upgrades, refreshers, permits, and testing. For many farmers and farm workers the cost significantly increases for travel, meals, and lodging expenses if the training and testing is not offered in their rural communities. Putting farm workers through MELT is cost prohibitive for farm businesses because seasonal farm work provides limited full-time employment for Albertans and fierce competition for truck drivers makes it difficult for farms to retain employees long-term. The onus to complete the Class 1 training must be on the drivers because of the significant investment required.

The Canada-Alberta Job Grant (CAJG) is not a solution for farm employers. According to the Job Grant Team at the Ministry of Labour, to be eligible for CAJG funding employers must be incorporated and they can only apply for training for non-family members. Over 97% of Alberta's farms are family farms, but only 23% of its family farms are incorporated. The majority of employees on these family farm corporations are family members, so very few farms with non-family employees would even qualify.

Ineligible for student aid – Drivers who want to get a Class 1 commercial driver's licence cannot access government student loans to help cover tuition like other post-secondary education and skilled trade apprenticeship programs. Drivers with RRSPs and RESPs may be able to withdraw these funds to cover their MELT training costs. Some driving schools offer financing options, although the third-party financiers can charge exorbitant interest rates and fees. *Financial need should not be a barrier for Albertans that need this skill for their career path.*

In light of all our concerns, we want to reiterate that farmers unequivocally support safer roads. The need for Class 1 licences on farms will only increase over time as large-scale farming is driven by improving efficiencies. Our organizations are willing to engage with the Government of Alberta to find workable solutions to achieve high voluntary compliance. To ensure the agriculture industry continues to contribute greatly to Alberta's economic recovery we ask you to consider the following:

- 1) Adjust the November 30, 2020 and March 1, 2021 MELT deadlines for farmers and farm workers because of the significant disruption on timelines caused by the pandemic.
 - a. December 31, 2020 to apply for an extension to comply with the MELT program
 - b. September 1, 2021 to pass the MELT knowledge and road tests.

- 2) Treat agriculture extension drivers who completed their preMELT Class 1 licence before the lockdown the same as Transition drivers. Grant these extension drivers the same 2-year probation period and grandfather the Class 1 licence to those with a clean driving record.

Note: The United States Federal Motor Carrier Safety Administration (FMCSA) has delayed their Entry Level Driver Training (ELDT) rule again until February 7, 2022. There is no indication from the FMSCA that Class 1 licenses issued prior to this date will not be grandfathered.

- 3) Recognize Class 1 Commercial Truck Drivers as a skilled occupation to allow access to drivers seeking Alberta Student Aid.
- 4) Expand the Canada-Alberta Job Grant (CAJG) criteria so more farm employers can qualify.
- 5) Offer Class 1 MELT Knowledge and Road Tests throughout the year in locations across Alberta, so drivers from rural communities have equal access opportunity.
- 6) Reduce the cost barrier for the Class 1 MELT program with alternative approaches:
 - a. Reducing the minimum instructional hours from 113 to 103.5, which aligns with Canada's National Safety Code³.
 - b. Recognizing Class 3 driving experience in a graduated licence system.
 - c. Allowing behind the wheel instruction from a combination of Instructors and vetted Class 1 drivers.
 - d. Supporting research and development of cost-saving technologies to upskill faster and reduce instructional hours, e.g. virtual reality training, online training, etc.

In closing, we ask you to please help Alberta's farmers find solutions for these critical concerns relating to the implementation of MELT. The competitiveness of Alberta's agriculture sector and rural communities will benefit from a practical approach to addressing these concerns. Our organizations are willing to work with the Government of Alberta and would like to meet with you to discuss this further. At your earliest convenience, please contact Karla Bergstrom, Manager of Government and Industry Affairs with Alberta Canola at karla@albertacanola.com or 780-819-1450, to facilitate this discussion.

Sincerely,

³ https://ccmta.ca/images/pdf-documents-english/national-safety-code/National_Safety_Code_Standard_16_-_Commercial_Truck_Driver_Entry_Level_Training_-_Jan_2020.pdf


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