

Honourable Marc Garneau  
Minister of Transport  
330 Sparks Street  
Ottawa, Ontario  
K1A 0N5

Dear Minister,

The Canadian Propane Association (CPA) has identified some significant concerns regarding Transport Canada's (TC) timelines for the implementation of the Electronic Logging Device (ELD) requirements. Already posted in *Canada Gazette* Part 2, these requirements would come into force for federally regulated carriers, with a timeline for full compliance of June 12, 2021.

In the interest of responsible implementation, the CPA is requesting this date be extended to provide the required 24-month implementation period that was originally planned in the ELD process application. The CPA is also requesting a grandfather provision to allow providers with ELDs already in place currently not accredited, the time they need to get the accreditation or modify their existing platform to meet TC's requirements.

When the initial plan for implementation of ELD systems was brought into existence, it was determined that a 24-month implementation timeline would be required to allow transporters to identify and install ELD platforms in their vehicles by "Accredited Providers" identified by Transport Canada's "List of Certified ELD". This list has yet to be populated, providing transporters no options for proceeding to comply with the regulatory requirements. Furthermore, the process was anticipated to be a 4-6 week timeline for an ELD to be tested and approved.

Because of the delays by TC, transporters will be yet further delayed in their ability to set up an approved ELD system. In effect, this leaves transporters only 9-10 months to implement the ELD requirements, if the certifying body is identified today, including to conduct research on providers, identify products, carry out the acquisition and installation processes, troubleshoot and test the platforms function, work to integrate other logistic platforms already in place and train all staff on its use.

While this may or may not be feasible even for smaller carriers, larger transporters would be required to shut down unmanageable numbers of their fleet for the installation process, and still provide their essential services.

The CPA members, with decades of experience in the transportation industry, feel that large fleets would need 18-24 months to properly implement these changes in an effective manner without adversely affecting their customers and the transportation needs in the industry.

Furthermore, some transporters have worked towards compliance despite the lack of information Transport Canada indicated they would provide. These transporters were also expecting a "grandfather clause" allowing them an additional 24-month grace period to work with their providers to meet the specific functions indicated within the regulation. With their advanced efforts to comply, some providers have already installed ELD systems and would need time to attempt to modify their existing platform, or remove the existing platform in order to install the accredited versions if their current ELD provider

cannot meet the requirements. This added cost and scheduling means additional time should be afforded to those companies who attempted to meet the requirements in a quick and compliant manner and then were forced to adjust to changes in those requirements.

While the CPA agrees with the added benefit of safety that the ELD requirements may provide, unfortunately with the timeframes currently indicated and the lack of provided platform accreditation from TC, the CPA feels that this could lead industry to quickly attempt to comply without being able to effectively cover all the needed aspects of the ELD system. This may lead to unnecessary problems in the implementation of this beneficial process.


The CPA has been encouraged throughout COVID-19 by the support and concern Transport Canada has shown, through the numerous changes and exemptions that have helped our industry continue to provide it's essential services while under severe constraints.

Those measures were needed to continue with our service provisions and we hope that Transport Canada will also see the need for adjustment to ELD timelines considering the effects from the pandemic and the slowed progress that has resulted. These delays were experienced within the industry, the services it supports and within the regulatory bodies that apply.

By extending these timelines, Transport Canada will show industry that it understands the importance of the ELD implementation and appreciates the hardship that its implementation may cause from the delays in obtaining needed information and guidance during these unprecedented times.

We would welcome an opportunity to discuss these important measures with you and your officials so that we can examine the important benefits of implementing these important changes in a timely manner.

Sincerely,

A handwritten signature in black ink, appearing to read 'Nathalie St-Pierre', is centered within a light gray rectangular box.

Nathalie St-Pierre  
President & CEO