January 29, 2021

RE: Update on industry effects of current MELT framework

An Open Letter to Our MLAs and Government Ministers;

Southern Alberta’s agricultural community is grateful for the Alberta Government’s confidence in us and your recognition of our role in supporting our provincial economy, particularly during these hard times for the oil and gas industry. We appreciate expressions of your confidence through investments such as the twinning of Highway 3 between Taber and Bow Island, and your government’s substantial recent investment in our irrigation districts. However, the Class 1 drivers we need to move our commodities are just as vital a link in our supply chain as good highways and irrigation infrastructure. We are writing because, despite recent extensions and modifications, the current MELT framework still presents a substantial risk and cost to our farms and our communities, and we want to encourage your further attention to this issue in order to minimize these risks and costs.

As farmers we are starting to come to terms with the effects that MELT is going to have on our farms and communities. For our farms, MELT means greater challenges harvesting and transporting our crops because of Class 1 driver shortages. The greatest pressure farmers have is safely and rapidly harvesting our crops. This is the time of the year that we need the most Class 1 drivers. The current MELT framework stands to substantially increase the pressure on our farms at this critical time of year. In our communities many individuals rely on driving truck for a significant portion of their income, whether for local farms or for local trucking companies. By dramatically increasing the difficulty of obtaining a Class 1 licence, MELT is placing significant hardship on these individuals and communities.

 This hardship is not just a matter of financial cost; much of our local agricultural work force is composed of an immigrant population who are strong in practical knowledge and motor vehicle safety, but lack the education or testing ability to successfully pass the current knowledge test because English is their second language. Upon request, the Class 5 and 3 knowledge tests offer additional help for such people, whereas the Class 1 test does not. The combined impact of all these individual effects of the MELT framework will continue to grow on our farms and in our local communities until we find ways to address them.

Consider one example from a local farm to see some of the impact of MELT. An employee on a local farm enrolled in the MELT Extension program but has now failed both written test attempts because he struggles with the written English language. He has accumulated nearly 650 hours of Class 1 driving with a clean driving record, but after failing 2 knowledge tests he has lost his Class 1 and has been dropped to a Class 5. For this employee to maintain his current employment, it will now require him to spend $10,000-12,000 for the full MELT training, and take 6 weeks off work, at an additional cost of $5,000-6,000 in lost income. If he is unable to bear those costs, the only options left to him are to look for another lower paying job, go on unemployment, or leave the community and look for work elsewhere. This is only one example; we could provide many similar ones from other neighbors. The point is that having such employees and neighbors removed as capable Class 1 drivers is harming our farms and our communities by removing capable, safe, and accident-free Class 1 drivers from Alberta’s economy. We appreciate that the government has attempted to address this in part with the Experience and Equivalency Class 1 MELT, but Class 3 drivers are not Class 1 drivers and we still expect large shortages in Class 1 drivers for our industry.

 As an agricultural community consisting primarily of family farms where our parents, siblings, and children work alongside of our employees, safety is our top priority and something we are very familiar with because of many other safety programs we operate under. From the Canada GAP food safety program, to the Verified Beef Production program, to the Safe, Safer, Safest program from the Alberta Chicken Producers, not to mention Bill 6’s recent changes to farm regulations under WCB, our farms and employees are very safety-conscious. We would not be awarded our annual production licences or be able to obtain adequate farm insurance if we could not demonstrate appropriate safety practices, including driver safety and vehicle maintenance. We do not want unqualified drivers representing our farms on the roads. All we are asking is that the education and testing process for new Class 1 drivers be modified so it is more accessible and more achievable for current and potential drivers.

Our final concern is specific to irrigation farms and has to do with recent statements in the media that suggest our government wants to harmonize Alberta’s Class 1 regulations with other similar provincial and federal regulations. Our fear is that this demonstrates that the Alberta government does not adequately understand our unique situation. Southern Alberta’s irrigated agriculture industry dynamics are substantially different than many other jurisdictions, due to the production intensity of the high value crops we grow here in irrigation country. For example, most dryland farms that comprise the vast majority of Western Canadian farm production, harvest at most 2 metric tonnes per acre of production per year, but here on our irrigation farms we harvest up to 30 metric tonnes per acre. This means that our need for Class 1 drivers at harvest time is much more intense than most other farms. We understand the common sense of trying to align Alberta regulations with those in other jurisdictions in Canada, but we want to ensure that situations like ours do not fall through the cracks, and that our harvests – which add a great deal of value to the Alberta economy every year – do not become a casualty of these new regulations.

As an agricultural industry we propose the following to help reduce barriers to current Class 1 driver licencing:

1. We propose that there be a graduated Class 1 licence. This would start with a 40-hour course (similar to the Experience and Equivalency Class 1 MELT) which, upon successful completion, will give the driver probationary status and restrict them to a 300 KM radius from their place of work for 3 years.
2. Driver examinations can be done orally with the help of an interpreter if needed, similar to the service offered for a Class 3 or 5 licence.
3. In order to upgrade to an unrestricted Class 1 licence after the 3-year probation period, a driver would have to take both a road test and a knowledge test with an oral option.

In conclusion, the current MELT framework will create many different ripple effects that will place undue financial and social burdens on our farms and communities, burdens that threaten many individual livelihoods and also hamper agricultural productivity here in Southern Alberta. The fact is that the harder we make it for workers to get a Class 1 licence, the less we will see coming through the programs. This means that in an industry already short of qualified drivers, the shortage will only increase. MELT’s current framework creates an unsustainable barrier to licencing that will affect all industries that rely on moving products from production to markets. We all want the same thing: to maintain truck driving as a viable employment option for Albertans while still keeping our roads and people safe. We ask you to carefully consider the burdens we have described, and the measures we have proposed to help address them, and we encourage you to continue to work to make MELT work for all Albertans. The 2021 crop production season is soon approaching and we all need to make this issue a top priority.

On behalf of our business and our employees we thank you for your attention to this matter.

Sincerely,

NAME

FARM NAME

LOCATION