

December 9, 2016

Mr. Robert Oliphant, MP
Chair, Standing Committee on Public Safety
and National Security
Hill Office
House of Commons Ottawa,
Ontario Canada K1A 0A6

Re: Bill C-226 - An Act to amend the Criminal Code (offences in relation to conveyances) and the Criminal Records Act and to make consequential amendments to other Acts (The Impaired Driving Act)

Mr. Oliphant:

I am writing to you on behalf of the Canadian Council of Motor Transport Administrators (CCMTA). CCMTA Members comprised of the provinces, territories and federal government (Public Safety and Service Departments and Departments of Transportation) want to ensure the Standing Committee on Public Safety and National Security is aware of the implications to jurisdictions by fulfilling the terms of the proposed Private Members' Bill.

We understand that Bill C-226 is well into its second reading and will come into force 90 days after Royal Assent. The Bill has considerable policy, operational and technological implications which pose significant challenges to jurisdictions which means the feasibility of meeting a 90 day timeline is problematic. On average the jurisdictions estimate it will take 18 months to two years to implement the required training, documentation and systems changes as a start.

Moreover the costs associated with Bill C-226's substantive change will put a considerable financial burden on provinces and territories in an already challenging financial context. Cost implications for an average size jurisdiction are estimated in the \$1 million dollar range.

Road safety is paramount to the work of CCMTA, and it is the lens through which we prioritize our work. CCMTA provides collaborative leadership in the areas of Road Safety Research and Policy, Drivers and Vehicles and Compliance and Regulatory Affairs. The organization coordinates all matters dealing with the administration, regulation and control of motor vehicle transportation and highway safety and is custodian of the National Safety Code, which ensures cross-Canada coordination and reciprocity in the management of truck and bus operations.

We recognize the proposed amendments are meant to address road safety and the issue of impairment. We are encouraging you take into account the implications identified above which are required to operationalize the Bill.

We appreciate your consideration of this matter.

Sincerely,



Steve Louttit
Chair,
CCMTA Board of Directors

cc: Allison Rougeau, CCMTA Executive Director