



November 15, 2019

John Pearson
Executive Director
Council of Deputy Ministers Responsible for Transportation and Highway Safety
Suite 401 – 1111 Prince of Wales Drive
Ottawa ON K2C 3T2

RE: Autotarp Permit Allowance

Dear John,

The Alberta Motor Transport Association (AMTA) is committed to working together with government to identify and provide solutions for the commercial transportation industry. We would like to discuss at the Task for on Weight and Dimensions the change of the Federal MOU and or Provincial changes for the use the installation of autotarp equipment. Current the MOU allows for a 10cm auxiliary devices which needs to be expended to 31cm on both front and rear of each trailers above 3.0 meters from the pavement.

Over a five year period, between 2014 – 2019 the Alberta Logging / Woodlands operations experienced over 150 falls resulting in over \$11 million in Workers Compensation Board (WCB) claims. Autotarp equipment is proven to decrease the number of work related injuries and prevent elevated falls during load securement. For a minimal standard fee, this annual permit will eliminate the risk of driver injury but and will also save WCB millions of dollars.

British Columbia has already approved autotarping systems and has experienced great benefits. AMTA believes that Alberta would also benefit from the issuance of a permit. Safe work procedures for commercial drivers will be enhanced through autotarp equipment that assists to reduce preventable injuries and falls.

We would like to request a agenda spot at the Task Force of Weights and Dimensions meeting November 27th 2019 to discuss the safety benefits of an autotarping permit. A detailed Briefing Note is attached for additional information.

We look forward to your response and meeting with you.

Sincerely,

Andrew Barnes,
Director of Compliance and Regulatory Affairs, AMTA
Alberta Motor Transport Association
3599 56 Ave. East Edmonton International Airport, AB,
T9E 0V4

Attached:





Length Allowances for Autotarp Systems

PURPOSE

Alberta Motor Transport Association (AMTA) continues to prioritize safety while supporting the elimination of red tape that restricts the commercial transport industry. Alberta and British Columbia (BC) industry representatives have identified concerns with worker safety related to manually tarping loads of loose materials.

BACKGROUND

Currently, drivers manually secure their tarps which requires the driver to climb a ladder and twist and turn while exerting significant physical energy. Between 2014 -2019 within Alberta, the Worker Compensation Board (WCB) received 150 fall claims that were related to tarping at a cost of \$11,061,611.00. Within BC, WorkSafe BC received an average of 79 tarping claims a year, costing a total of \$1,727,167 per year on average. BC claims totaled over \$10 million between 2010 and 2015. Tarping related accidents can be avoided by the commercial transportation industry through the use of an auto tarp system.

AMTA members recognize that there is a device in compliance with the current regulations that is used as an auto tarp system. However, based on initial testing this past summer, this device presents challenges that must be addressed before it meets industry needs. The device is costly, heavy and still requires a driver to climb up the ladder to smooth out the chips before it will auto track. The industry accepted autotarp device must be able to close over the bulge of chips that naturally forms during loading.

AMTA members are unbiased on which device industry ultimately adopts. We are asking government to provide a 30.5 cm allowance by permit (OAL) for bulk trailers so that carriers have options to choose the best autotarp system available for their operations. The extra 30.5 cm will allow for the overhang of the rear arm of the motor, which extends approximately 30 cm past the back of the trailer. change of the Federal MOU and or Provincial changes for the use the installation of autotarp equipment. **Currently the MOU allows for a 10cm auxiliary devices which needs to be expended to 31cm on both front and rear of each trailers above 3.0 meters from the pavement.**

Alberta and British Columbia already allows for the use of aerodynamics on trailers. These systems can extend up to 1.52 m off the rear of the vehicles and when folded up to 30.5 cm off the rear of the vehicle as per Alberta Long Combination Vehicle (LCV) permit conditions, BC regulations and Compliance Circular No. 06-16. The autotarp equipment, as shown in the attached schematic, will be installed at the very top of the front and rear trailers with a height that doesn't impose a safety concern for public motorists.

In response to the BC Ministry of Transportation and Infrastructure worker safety, BC will allow length exceptions as described in this Circular for the use of 'autotarp' systems. Operation using the new allowances will be assessed after a period of one year, and a determination will be made



whether to continue the allowances into the future. We would like to have an autotarp system permitted in Alberta permanently.

As equipment will only be allowed at the very top of the vehicles (as shown below in appendix A) potential to interact with other road users is very limited. We do not expect to see detrimental impacts to other road users.

Appendix A:

RECOMMENDATION

The AMTA is seeking the support from the Government of Alberta allow an annual permit for autotarp systems and dimensions as shown in the diagram below:

- May extend no more than **30.5 cm** to the front or rear of any one vehicle;
- Must be attached to the top of the vehicle in such a way that no part of the autotarp system descends to a point less than 1.9 m above the ground; and
- The Federal MOU and or Provincial changes for the use the installation of autotarp equipment. Currently the MOU allows for a 10cm auxiliary devices which needs to be expended to 31cm on both front and rear of each trailers above 3.0 meters from the pavement.
- Must not be designed or used to carry cargo other than a tarp.

