

Mandatory Entry Level Training (MELT)

Project Overview

Since September 1, 2019, all Manitobans who want to obtain a Class 1 driver's licence must complete mandatory entry level training (MELT) as a prerequisite. MELT is part of the Manitoba government's commitment to road safety. MELT consists of 121.5 hours of in-class, in-yard and in-vehicle training that focuses on the basic operation and driver competencies that enable safe operation of Class 1 vehicles.

Drivers in the agricultural sector wanting to obtain a Class 1 licence were provided extra time to complete MELT, initially until August 31, 2020. This extra time was intended to allow the Manitoba government time to consult with key interested parties and groups, determine strategies to mitigate challenges, and finalize and communicate MELT requirements for the agricultural sector.

Engagement Overview

The goals of the consultation were:

- To provide the agricultural sector with accurate information to assist them with understanding the MELT requirements.
- To obtain feedback from the agricultural sector on the impact of MELT requirements.

The agricultural sector was asked to provide their feedback on challenges related to MELT and suggestions to mitigate these challenges in ways that are consistent with the goal of increased road safety in Manitoba.

In November/December 2019, a pre-consultation phase began with Keystone Agricultural Producers (KAP) to understand the concerns of the agricultural sector and what information may be necessary to provide in the consultation. Consultation themes were developed based on the information gathered from the pre-consultation.

During the consultation phase, over thirty Manitoba agricultural and commodity associations were invited to participate. Organizations were also given the option to submit comments. In March 2020, KAP provided a submission and their recommendations have been incorporated.

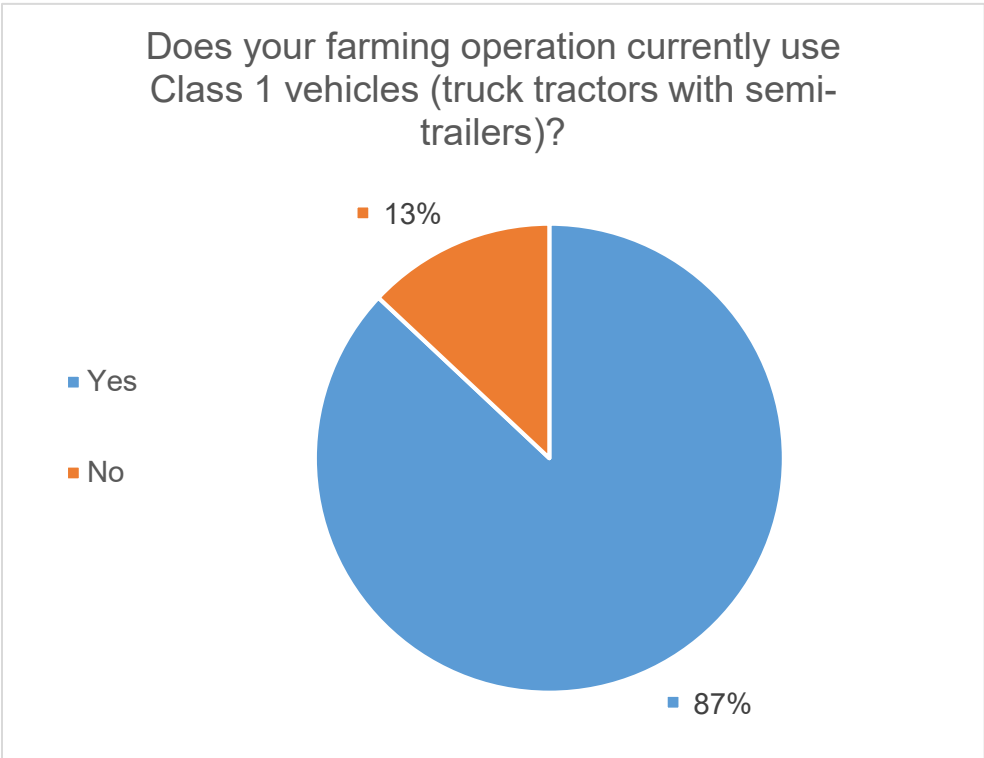
Manitoba Infrastructure gathered input from individuals within the agricultural sector using two methods:

- In-person open house, with storyboards and survey questions at Ag Days in Brandon (January 23, 2020). Approximately 70 people participated.
- Online consultation on EngageMB (www.engagemb.ca) with survey questions (February 20 - March 20, 2020). Approximately 150 individuals reviewed the information and approximately 50 stakeholders took the online survey.

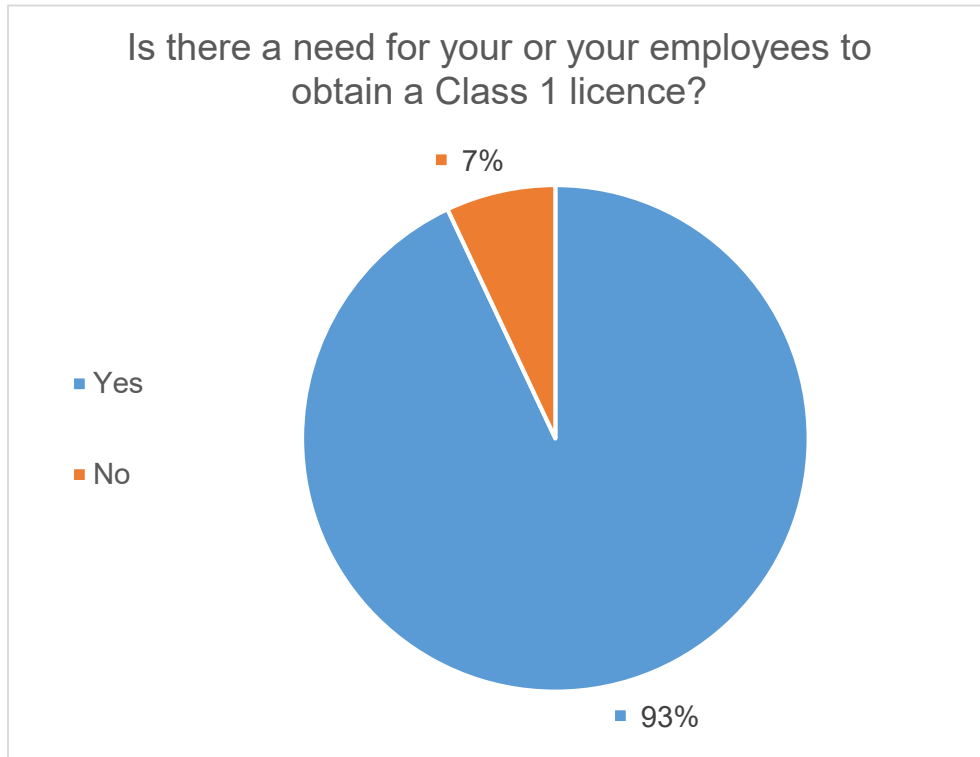
What We Heard

Demographic Vehicle Use Information

Participants were asked questions about their use of Class 1 licences in Manitoba farming operations. A majority of respondents (87 per cent) use Class 1 vehicles as part of their farming operations.



Ninety three per cent of the respondents stated that they or their employees require a Class 1 licence.



Seventy six per cent of farming operations that participated have someone with a Class 1 licence. Participants with a Class 1 licence were also asked how often they traveled outside of Manitoba and 69 per cent indicated that they only operated their Class 1 vehicle within Manitoba. Out of the 31 per cent of respondents that did operate outside of Manitoba, 64 per cent operated outside of Manitoba between 10 and 50 per cent of the time.

Challenges and Suggestions related to MELT for the Agricultural Sector

Feedback on the challenges and suggestions raised by stakeholders during the consultations are grouped into six themes as follows:

1. The timing of the agricultural deferral expiry date.

Among in-person respondents at Ag Days, 80 per cent expressed some challenges related to the timing of the expiry of the agricultural deferral. The primary concerns related to the expiry of the deferral occurring in the middle of harvest season (e.g.

spring-late fall) and that the expiry created additional pressure and limitations for hiring seasonal employees in the 2020 season.

Due to weather, crop growth and harvest delays, farmers have a very small window to move crops off the fields and rely heavily on seasonal employees. Farmers emphasized the need to retain employees during peak season, especially during spring seeding and fall harvest.

Agricultural respondents expressed the need for additional time to prepare for MELT in the off-season (e.g. winter months) and to defer the expiry date to spring.

2. The need for accessibility and flexible delivery options for completing MELT.

While 81 per cent of respondents thought that school locations were accessible, some expressed the need for accessibility in rural areas and outside of southeastern Manitoba. Many participants expressed concern that there was more demand for MELT than driving schools were able to accommodate.

Concern was expressed that there are no flexible part-time or online MELT curriculum delivery options. Respondents also noted a perceived lack of adherence by drivers to road signs, and Class 5 drivers' limited knowledge related to heavy vehicles, which may contribute to traffic collisions.

Agricultural respondents made the following suggestions to increase flexibility in program design and relevance such as:

- Providing online training for the classroom portion and part-time training options;
- Including an overview of road sign language; and
- Increasing education for Class 5 drivers related to driving around heavy vehicles.

3. The need for a MELT program that accounts for unique needs of the agricultural industry and suggestions for an agricultural-based curriculum.

Respondents expressed concern about a lack of clear communication regarding how MELT requirements apply to them and how much it would improve road safety given the realities of transportation in the agricultural sector. Responses from the agricultural sector indicate that MELT was perceived as an important road safety measure for the long-haul commercial trucking industry. However, some respondents perceived that MELT ignores realities in the agricultural sector. For example, Class 1 vehicles are required during the harvest season to drive much shorter distances for hauling grain and other commodities in local areas within close proximity to farms, primarily on dirt and gravel roads, with less travel on public highways.

Respondents in the agricultural sector had the following suggestions to address needs of the agricultural sector including:

- Providing clarity on the status of Class 1 licences issued under the agricultural deferral and MELT requirements for the agricultural sector;
- Providing separate support, funding and resources for farmers related to MELT;
- Considering different licensing options for the agricultural sector such as:
 - Extending the deferral date (e.g. to early spring 2021) and providing additional time to study and complete MELT in winter months to accommodate the harvest season;
 - Allowing anyone who has obtained an agricultural deferral licence and has a safe driving record to obtain a full Class 1 licence, or a conditional licence for registered farm trucks to drive within Manitoba only, with a permanent exemption from MELT;
 - Implementing a graduated licensing system for farmers (similar to the Graduated Driver Licensing program for novice Class 5 drivers); and
 - Creating a restricted Class 1 licence for the agricultural sector within a restricted/specified driving radius (e.g. 160 km) around their fields and/or for a restricted period or restricted to certain roads, in exchange for a permanent exemption from MELT.

4. Prior learning assessment and recognition.

The agricultural sector expressed that farmers have significant experience operating heavy vehicles, such as Class 3 vehicles and large equipment and many respondents felt that their in-vehicle and in-yard experience could be recognized in some way.

Agricultural respondents made the following suggestions to help mitigate the lost farm productivity that results from requiring MELT including:

- Engaging and consulting directly with the agricultural sector on training standards and considering a condensed program;
- Providing prior learning assessment and recognition for farmers' in-vehicle and in-yard driving experience with similar heavy vehicles, and if they are eligible, provide them with partial MELT credit and/or allow them to challenge the road test; and
- Allowing Class 1 drivers to ride along with Class 1A drivers to verify driving hours, and recognize the experience that producers will obtain during the one-year deferral – to provide credit towards the 41 hours of in-vehicle MELT training instead of registering with a driving school.

5. Tuition cost, time and other business considerations.

The agricultural sector is concerned that the high cost of MELT tuition (approximately \$6,000-\$8,000) is not affordable for most farmers or their employees, and does not include other costs, such as accommodation, travel, meals, etc. Farmers indicated that they will have significant difficulty paying employees, which will result in lost wages, and farmers not being able to hire seasonal employees. Concern exists for young adults,

temporary foreign workers and new immigrants that entry costs are too high, especially when most of them only require the licence for seasonal work. Concerns were expressed that this may create labour shortages in the agricultural sector, which may result in farmers finding other solutions for hauling their product, (e.g. use of Class 3 or 5 vehicles).

Employers were concerned about the business costs, in terms of lost farm productivity and unclear return on investment for seasonal employees. Farmers felt that they are being financially penalized; especially smaller family-run farms that cannot recover MELT costs by raising their commodity prices. Agricultural respondents suggested the provision of direct funding and subsidies for MELT students and for agricultural employers to consider youth career days/outreach to encourage more students to pursue an agricultural career.

6. Accessibility of road test bookings and road test concerns.

Prior to the COVID-19 pandemic, significant concern existed about the long waiting time to book a road test and the lack of road test availability, especially in rural areas. Many perceived that driver training schools and those in the commercial trucking industry were pre-booking large blocks of tests. Many individuals were concerned that they would not be able to book a road test prior to the August 31, 2020 expiry date.

Agricultural stakeholders had the following suggestions to increase the capacity of road tests and training such as:

- Having Manitoba Public Insurance consider setting aside a block of road tests specifically for the agricultural sector;
- Increasing the availability and capacity of road tests and examiners, especially in rural areas; and
- Increasing the number of schools and locations in rural areas covering a broader geographical range in Manitoba.

In regards to road testing, many expressed frustration about not being allowed a pre-trip inspection list during testing because many drivers are failing this portion. Many felt that memorizing the list is unreasonable and that a checklist should be provided as part of the testing.

Next Steps

The information from the consultation with the agricultural sector was taken into consideration along with the Manitoba government's commitment to increase road safety for the public and operators of heavy commercial vehicles.

In the summer of 2020, the Manitoba government extended the deadline for Class 1 drivers in the agricultural sector to complete MELT to March 1, 2021 from August 31,

2020. Licences granted during the agricultural deferral period continued on the same terms, with conditions that limit drivers to operating Class 1 farm-plated trucks, and only within Manitoba. If MELT was not completed by March 1, 2021, their Conditional Class 1 licence was reverted to a Class 1A (authorized instruction). In these cases, the licence holder was able to complete MELT and obtain a full Class 1 licence without having to take their road test again.

To address MELT tuition, in November 2020, Manitoba Economic Development and Jobs announced a one-time \$500,000 MELT grant program for the agricultural sector to fund up to two-thirds of MELT tuition costs for farm employees and self-employed farmers. In recognition of the difficulty some farmers were experiencing finding training spots, the eligibility to receive MELT funding was extended to include training taken from November 1, 2020 up until June 30, 2021 (from March 31, 2021). The grant funding for MELT tuition was fully distributed to Manitoba's agricultural sector.

Beginning April 2021, a Canada-Manitoba Job Grant was available and the agricultural sector is eligible to apply to receive reimbursement for up to 75 percent of MELT tuition costs. The Canada Manitoba Job Grant had two intakes in the 2021/22 fiscal year, April and end of August. The program will reopen in the Spring of 2022. Application details are available on the Manitoba Economic Development and Jobs website at: <https://www.gov.mb.ca/jec/busdev/financial/cmjg/index.html>

Information on MELT will continue to be updated on Manitoba Public Insurance's website at: <https://www.mpi.mb.ca/Pages/mandatory-entry-level-training.aspx>

Questions?

Please direct any questions or comments to Manitoba Infrastructure at: AdminServDivADM@gov.mb.ca .