

# Commercial Vehicle Safety & Enforcement

Notice #04-13 March 6, 2013

## **Vehicle Inspections & Standards**

# **NOTICE**

To All Designated Inspection Facilities and Authorized Inspectors

### Re: Structural Integrity Inspection Process

This notice applies to ALL vehicles that require a mechanical inspection under the BC Motor Vehicle Act Regulation (MVAR) Division 25 Part 3 - Salvage, Modified and Reconstructed.

#### Vehicles Included:

- 1. Vehicles branded with the title Salvage;
- 2. Any vehicle deemed to have Structural Integrity defects as determined by an AI during the mechanical inspection process; and
- 3. Any vehicle ordered for a Structural Integrity Assessment by a Peace Officer.

**NOTE:** Vehicles with the branding title "Altered" may also have structural integrity issues and Al's should determine whether a Structural Integrity Declaration Report is required to be completed by a Trade Qualified Autobody Technician. Vehicles that have the branding title "Altered" typically are used for amalgamated, ubilt, or modified vehicles. Other jurisdictions may have different branding titles for vehicles. Al's and DIF's must be thorough when visually inspecting these vehicles to ensure that there are no structural integrity or safety issues.

#### Intent

- 1) Clearly define a Structural Integrity Inspection process administered by DIF's;
- 2) Advise on the applicable standards of repair; and
- 3) Outline the regulatory requirements for DIFs and Als when performing a complete inspection on a salvage vehicle or any vehicle deemed to have Structural Integrity defects as determined by an Al.

#### **Background**

Currently, the MVAR requires that Salvaged, Modified and Reconstructed Vehicles have a certificate of inspection completed at a Designated Inspection Facility (DIF) by an Authorized Inspector (AI) to verify that the mechanical components meet the standards. When a salvage vehicle requires a mechanical inspection, it is a requirement that a Structural Integrity Assessment Report (MV3201) be completed, submitted to an AI and signed by a trade qualified Autobody Technician, prior to a mechanical inspection.

Following completion of a vehicle rebuild, it may be difficult or in some cases be impossible, to visually inspect the structural repairs. Some repairs may have been concealed after the surface has been finished and painted or obscured by other installed components. The visual mechanical inspection in those cases may make it difficult to indentify improper structural repairs that have taken place.

#### **Application**

There will be an implementation of two new forms:

- 1. Body Integrity Inspection Report (CVSE0031); and
- 2. Structural Integrity Declaration Report (CVSE0032)

The Body Integrity Inspection Report (CVSE0031) must be complete by the DIF and AI prior to a mechanical inspection.

The Structural Integrity Declaration Report will replace the existing Structural Integrity Report (MV3201). The Structural Integrity Declaration Report (CVSE0032) must be completed and signed by a Trade Qualified Autobody Technician. DIFs and Als must only accept the original Structural Integrity Declaration Report (CVSE0032). Any Structural Integrity Declaration Report (CVSE0032) that is not a signed authentic original form or has been photocopied, modified, altered, or changed is unacceptable and must be rejected.

All Authorized Inspectors are required to inspect salvage vehicles in accordance with the BC Vehicle Inspection Manual and MVAR requirements. Als must be satisfied that a salvage vehicle or any vehicle with structural component repairs meets all applicable standards AND is safe for operation on highway. [ref. MVAR 25.22]

Vehicles that are presented to a DIF for inspection without the correct documentation and that do not meet the specific structural integrity requirements must **not** pass a provincial inspection.

#### **Inspection Process**

- 1. For salvage vehicles with a title transfer date of <u>April 1, 2013</u> or later presented for a mechanical inspection:
  - A) Before any mechanical vehicle inspection begins, the following must be complete and presented to the Designated Inspection Facility:
    - Proof of ownership (Bill of sale or Registration) document;
    - Vehicle Salvage Documentation (title/ownership);
    - Photograph of the public VIN for the vehicle being inspected;
    - Colour photographs of the rear, and front and each side of the damaged vehicle and photographs that clearly show damaged area(s);
    - Structural Integrity Declaration Report; and
    - Body integrity Inspection Report.
- 2. For salvage vehicles with a title transfer date prior to **April 1, 2013** presented for a mechanical inspection:
  - A) Before any mechanical vehicle inspection begins, the following must be complete and presented to the Designated Inspection Facility:
  - Proof of ownership (Bill of sale or Registration) document;
  - Vehicle Salvage Document:
  - Structural Integrity Declaration Report; and
  - Body integrity Inspection Report.

**NOTE:** For all salvage vehicles, it is recommended that the AI see the damaged vehicle first hand prior to any repair where possible, develop a work plan for the repair process and work in conjunction with a reputable autobody shop and technician.

**NOTE:** Where a vehicle has been branded as salvage for non structural damage (ie. glazing material) it may not be necessary to complete a Structural Integrity Declaration and Body Integrity Inspection Report. The reasons for not completing the forms must be clearly noted on the mechanical inspection report by the AI

#### **DIF and AI Responsibility**

CVSE strongly recommends that DIFs and Als work in conjunction with familiar and reputable Autobody technicians and businesses to ensure that all Structural Integrity Declaration information is accurate and complete to reduce any potential liability exposure.

Compliance of the body integrity and mechanical inspection performed by an Authorized Inspector at a Designated Inspection Facility is the **direct responsibility** of that DIF and AI.

Any certificate of approval decal applied to a vehicle by an AI certifies that:

- 1. All required processes procedures have been properly completed;
- 2. All required documentation is legitimate, accurate and complete; and
- 3. The vehicle meets all applicable mechanical **AND** structural safety standards.

As a reminder, facilities and Als are not obligated – in any way – to conduct salvage vehicle inspections. However, DIFs and Als assume full legal responsibility of the vehicle – <u>inclusive of structural and</u> mechanical items – on issuance of a passed mechanical inspection report.

#### **Enforcement**

Documents, completed inspection reports and photographs are all integral requirements as part of the defined Structural Integrity Process. Any missing documents, incomplete documents or acceptance of a non authentic Structural Integrity Declaration Report (CVSE 0032) may be grounds to deem the vehicle <a href="mailto:improperly inspected">improperly inspected</a> and subject the DIF and AI to investigative action.

Any evidence of improper inspections may result in enforcement action for improper approval of a motor vehicle contrary to MVAR 25. This may result in violation tickets issued, suspension or cancellation of your DIF license and/or AI certification.

Should you have any questions or concerns regarding this change, please contact your local Area Vehicle Inspector found at <a href="http://cvse.ca/vehicle\_inspections/PDF/MVI\_Phone\_List.pdf">http://cvse.ca/vehicle\_inspections/PDF/MVI\_Phone\_List.pdf</a>, Geoff.Ford@gov.bc.ca, Technical Advisor at 250-953-4039 or <a href="mailto:Brian.Kangas@gov.bc.ca">Brian.Kangas@gov.bc.ca</a> at 250-953-4008.

Regards,

Brian Kangas, Manager,

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Vehicle Inspection and Standards Program

Commercial Vehicle Safety & Enforcement Branch