2.22 Special Permits and In-Transit Permits

Introduction

The Motor Registration Division (MRD) of the Department of Government Services is responsible for licensing, registration and operation of all vehicles and equipment operating on the Province's roads. Standards relating to the licensing, registration and operation of vehicles are legislated under the *Highway Traffic Act* and the *Vehicle Regulations*. These *Regulations* provide specific limits relating to vehicle weight, dimensions, configurations and cargo load.

Special Permits

Under the *Regulations,* any vehicle or equipment which exceeds the defined limits for weight and/or dimensions on the Province's roads, requires a Special Permit. These permits are for a specified period and route, and contain limitations and requirements pertaining to the use of the vehicle by the operator. For the year ended 31 March 2003, MRD issued 3,507 Special Permits.

In-Transit Permits

Unlicensed and/or unregistered vehicles are not allowed to operate on the Province's roads. However, the *Highway Traffic Act* provides that the Registrar of Motor Vehicles may issue an In-Transit Permit for unlicenced and/or unregistered vehicles to operate, for a single trip, on the Province's roads. The *Act* provides that In-Transit Permits may only be issued for the purpose of being registered, to be moved from one place to another for repairs or to be inspected before registration, to be moved from a point of entry into the Province to a dealers premises, or for another purpose approved by the Registrar. For the year ended 31 March 2003, MRD issued 2,817 In-Transit Permits.

Scope and Objectives

The Motor Registration Division issues Special Permits and In-Transit Permits. We completed our review of this area in January 2004. The objective of our review was to determine the policies, procedures, standards and guidelines governing the issuance of these permits.

Conclusions

In 2003, there were 165 Special Permits issued to permit mobile cranes and construction equipment, which exceeded the defined limits for weight and/or dimensions, to travel on the Province's roads. However, these vehicles are not required to have an annual inspection performed by an Official Inspection Station. As a result, the issuance of these Special Permits may contribute to the existence of unsafe vehicles on the Province's roads.

Although Highway Enforcement Officers at MRD, from time to time, stop mobile cranes and construction equipment to ensure that these vehicles have the required Special Permit and that they are operating in accordance with the requirements of the permit (e.g. route, lights, escorts, and signage), the vehicles are not subjected to any mechanical inspection.

In 2003, there were 2,817 In-Transit Permits issued for unlicensed and/or unregistered vehicles. However, these vehicles are not required to be inspected; instead, applicants are informed that the vehicle operation is subject to restrictions of the *Highway Traffic Act* (i.e. the vehicle must be safe). Not requiring an inspection is significant in that one of the reasons for which an In-Transit Permit could be issued is to drive the vehicle from one place to another for repairs. Therefore, the type and/or extent of repairs may have safety implications. As a result, the issuance of these permits may contribute to the existence of unsafe vehicles on the Province's roads.

Certain mobile crane operators may be obtaining In-Transit Permits because the cumulative cost of these permits is cheaper than the annual licensing fee. Of the 138 Special Permits issued to mobile cranes in 2003, 73 also required an In-Transit Permit because they weren't licensed.

Findings and Recommendation

The Motor Registration Division of the Department of Government Services is responsible for licensing, registration and operation of all vehicles and equipment operating on the Province's roads. *Vehicle Regulations* under the *Highway Traffic Act* contain requirements relating to vehicle weight, dimensions, configurations and cargo load, with specific limits outlined in schedules to the *Regulations*. Under the *Regulations,* any vehicle or equipment which exceeds the defined limits for weight and/or dimensions on the Province's roads, requires a Special Permit. These permits are for a specified period and route, and contain limitations and requirements pertaining to the use of the vehicle by the operator. In certain situations, In-Transit Permits may be required to allow unlicensed vehicles to be driven for a particular reason.

Special Permits

Special Permits are required for vehicles and equipment such as commercial vehicles (e.g. tractors, straight trucks and dump trucks), mobile cranes, and construction equipment (e.g. loaders, back hoes, road paving equipment and crushers) which exceed the defined limits for weight and/or dimensions on the Province's roads. These permits are for a specified period and route, and contain limitations and requirements pertaining to the use of the vehicle by the operator.

2.22 Special Permits and In-Transit Permits

There were a total of 3,507 Special Permits issued for the year ended 31 March 2003, the details of which are outlined in Figure 1.

Figure 1

Special Permits by Vehicle Type
Year Ended 31 March 2003

Licence Plate Type	Vehicle Type	Number of Special Permits	Fee Paid
C,P	Commercial	3,200	$209,800
CRA	Mobile Cranes	138	5,050
X	Construction Equipment	27	2,800
Various	Other	142	10,700
	Total	**3,507**	**$228,350**

Source: MRD Management Information System

MRD officials indicated that, although commercial vehicles are required to have an annual inspection performed by an Official Inspection Station, mobile cranes and construction equipment are not required to be inspected. Annual inspections performed on commercial vehicles include such things as brakes, steering, suspension and tires. An Official Inspection Station is a garage that is appointed by the Minister to conduct vehicle safety inspections and to issue related certificates.

Upon inquiry we found that MRD staff do, from time to time, stop mobile cranes and construction equipment to ensure that these vehicles have the required Special Permit and that they are operating in accordance with the requirements of the permit (e.g. route, lights, escorts, and signage). However, the vehicles are not subjected to any mechanical inspection. Highway Enforcement Officers at MRD indicated they have not been trained to inspect mobile cranes and construction equipment.

MRD officials indicated that policies with respect to the inspection of mobile cranes and construction equipment are currently under review.

2.22 Special Permits and In-Transit Permits

In-Transit Permits

Vehicles which are unlicensed and/or unregistered are not allowed to operate on the Province's roads. However, the *Highway Traffic Act* provides that the Registrar of Motor Vehicles may issue an In-Transit Permit for unlicenced and/or unregistered vehicles to operate, for a single trip. The *Act* provides that In-Transit Permits may only be issued for the purpose of being registered, to be moved from one place to another for repairs or to be inspected before registration, to be moved from a point of entry into the Province to a dealer's premises, or for another purpose approved by the Registrar.

For the year ended 31 March 2003, 2,817 In-Transit Permits were issued for vehicles that were not licensed and/or registered to be operated on the Province's roads.

Unlicensed and/or unregistered vehicles provided with In-Transit Permits may not be required to be inspected. Applicants are informed that the vehicle operation is subject to restrictions of the *Highway Traffic Act* (i.e. the vehicle must be safe). Not requiring an inspection is significant in that one of the reasons for which an In-Transit Permit could be issued is to drive the vehicle from one place to another for repairs. Therefore, the type and/or extent of repairs may have safety implications. As a result, the issuance of these permits may contribute to the existence of unsafe vehicles on the Province's roads.

MRD officials indicated that certain mobile crane operators may be obtaining In-Transit Permits because the cumulative cost of these permits is cheaper than the annual registration and licensing. Of the 138 Special Permits issued to mobile cranes in 2003, 73 also required an In-Transit Permit because they weren't licensed. Currently, there is no restriction placed upon the number of instances in which an operator can be issued as In-Transit Permit for a vehicle.

For example, we identified an instance where the annual licence fee of a mobile crane would be $2,088. A review of In-Transit Permits issued by MRD for the period 1 April 2002 to 31 March 2003 indicated that 36 permits were issued for the crane (at least one permit issued in every month). The total cost, therefore, of operating the crane was only $396 (36 trips at $11 per trip), a saving of $1,692 over the cost of licensing.

MRD officials indicated that policies with respect to the issuance of In-Transit Permits are currently under review.

Recommendation

The Department of Government Services should continue with efforts to review and address issues surrounding Special and In-Transit permits.

Department's Response

In general, except for a minor clarification noted below, we feel that the audit does give an adequate review of some specific issues regarding the special and in-transit permit processes. In particular, and as your report notes, policies with respect to the inspection of mobile cranes and construction equipment as well as those respecting the issuance of in-transit permits are currently under review.

With respect to the issue of annual inspections of mobile cranes, officials have been reviewing this issue and discussing it with their counterparts in other provinces. We had hoped to reach a consensus with the other provinces on a unified direction to minimize the potential for conflicting regulations between jurisdictions. Most jurisdictions in Canada do not require annual inspections of these vehicles. Unfortunately, that consensus has not happened and departmental officials have been instructed to finalize their recommendations and present them as soon as possible.

In-transit permits and other closely related registration issues have been under review by Motor Registration for some time. Progress in these areas has been somewhat slowed by the lack of full time policy/procedural implementation staff. Despite this staffing problem, changes to policy and procedures specific to the in-transit issue are in the final review stages. It is expected that the proposed changes will address the key issues noted in the audit.

There is a minor clarification required related to the issuance of special permits. The audit states, "These (special) permits are for a specified period and route…", when referring to all oversized and over-mass special permits. It should be noted that Motor Registration Division also issues annual special permits for non-route-specific travel.

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