

FREQUENTLY ASKED QUESTIONS REGARDING THE *REGULATION RESPECTING SAFETY STANDARDS FOR ROAD VEHICLES*

Administrative Component

1. On what date did the new rules come into force?

November 20, 2016.

2. Why was this regulation amended?

The main reasons for the amendments were to harmonize Québec's regulatory requirements with the standards that apply in the rest of Canada, to clarify certain ambiguities as well as to take into account changes in technology.

3. Has a transition period been provided as of November 20, 2016?

No. As requested by the industry, a 6-month period between the adoption (May 18, 2016) and the coming into force (November 20, 2016) of the regulatory amendments was granted to give the stakeholders concerned time to prepare.

4. Are the mandatory lists of defects and the *Circle Check Guide* available in English?

The draft amendments to the *Regulation respecting safety standards for road vehicles* (RRSSRV), which contain the lists of defects (Schedule III), were published in both French and English in the *Gazette officielle du Québec* on May 18, 2016. The *Circle Check Guide*, which includes the lists of defects, is now available in both French and English on our website. The English version of the guide is available at <https://saaq.gouv.qc.ca/fileadmin/documents/publications/circle-check-guide.pdf>.

5. Can the lists of defects be changed?

No changes to the lists of defects are allowed. For example, withdrawing or changing the order of the various elements, or presenting the defects differently, is prohibited.

It is important to point out, however, that additional elements can be added in the section at the end of each list titled "Specific inspections required by the operator."

It is also possible to increase or decrease the font size, to add hatch patterns or grey shading to elements on the list that do not apply, e.g. the section on hydraulic brakes, where the vehicle in question is equipped with pneumatic brakes.

6. Does the *Circle Check Guide* have to be kept on board the vehicle?

No. It is not mandatory to keep the *Circle Check Guide* on board the vehicle. The applicable lists of defects and the valid circle check report, however, must be on board the vehicle.

7. When a mechanical defect is detected, does the defect number or code that appears on the list of defects have to be entered in the circle check report?

NO. This requirement has not changed from the Pre-Trip Inspection (PTI) rules. The defects detected must be entered in the circle check report. The person who performs the circle check can enter the defect code and specify the defect in the "Comments" section, but this person can also, as was the case with the PTI report, check off the non-compliant component and specify the details in the "Comments" section as needed. The defect can also be entered in the "Comments" section.

8. Does the report have to contain the title “Circle Check Report”?

No.

9. Can the pre-trip inspection (PTI) reports used in the industry prior to November 20, 2016 still be used for the circle check after that date?

The PTI reports can be used after November 20, 2016, provided the person who performs the circle check makes sure to add the information needed to meet the new regulatory requirements. This information, which is presented on page 17 of the *Circle Check Guide*, can be hand-written in.

10. Do the circle check reports have to be kept on board the vehicle for a certain period of time?

NO. The **completed and valid** circle check report must be kept on board the vehicle. During a roadside inspection, a carrier enforcement officer will request the report from the driver who is at the wheel of the vehicle.

11. The driver must submit the original copy of the circle check report within 20 days of the completion of the report. Is this 20 business days or calendar days?

The report must be submitted no later than 20 calendar days after it is completed, as provided for by National Safety Code Standard 13.

12. Does a circle check report have to be completed when an individual uses a truck for personal purposes (e.g. for an evening out or to move one’s personal belongings)?

Heavy vehicles **used** by a physical person for **personal purposes**, in other words, non-commercial or non-professional purposes, are not subject to the circle check requirement.

13. For a combination of road vehicles subject to the circle check, does the circle check have to be performed for every vehicle in the combination (one for the tractor truck and one for the trailer)?

YES, there are no changes in this regard.

14. When a combination of vehicles consists of a vehicle with a GVWR of 4,500 kg or more and a vehicle with a GVWR of less than 4,500 kg, does the circle check have to be performed for each vehicle?

YES, there are no changes in this regard.

15. Can more than one vehicle be included in a single circle check report? For example, can the report include a tractor truck and several trailers?

YES, provided that all the information required for a circle check is entered for each vehicle inspected when the circle check is carried out.

16. Who can perform the circle check?

The **driver** must perform the circle check of the vehicle he or she is driving. The circle check can also be performed by a **person designated by the operator**.

17. Does the designated person have to have any special qualifications?

Since operators are responsible for ensuring that the circle check is performed in accordance with the regulatory standards, they must make sure that the person they designate is intimately familiar with the circle check rules so as to be able to perform the inspection adequately. The circle check report, among other things, indicates whether or not the circle check was performed by a designated person.

18. When a circle check is performed by a designated person, who is held accountable for the circle check?

The operator is accountable for the circle check performed by the designated person.

19. Can a driver be a person designated by the operator?

YES.

20. With regard to the operator's signature on the circle check report when a defect has been detected, who can sign? Can it be a driver, a mechanic, the caretaker, or does it have to be a person from the company's management?

It is up to the operator to determine who should sign the circle check report when presented with a report in which a defect is indicated. It is up to the operator to determine who will act as his or her representative. Operators are not required to keep a register on this subject.

21. With regard to fire department vehicles, can a vehicle be dispatched to an emergency call and undergo the circle check afterwards?

The circle check for a fire department vehicle must have been performed within the previous 24 hours or upon return from the trip. When the vehicle remains parked at the fire station, a circle check must be performed every 7 days.

22. What are the requirements with regard to the circle check for heavy vehicles registered outside Québec?

Summary Table of Circle Check Requirements
for Heavy Vehicles Registered Outside Québec

Vehicle Registration*	Required List of Defects	Circle Check Report	Specific Motor Coach Inspection Report
Vehicles registered in Québec	List from Québec	<ul style="list-style-type: none">➤ Contents of the report must comply with section 197.0.3 of the RRSSRV➤ The report must be valid under the RRSSRV	Required if not registered with a preventative maintenance program (PMP) <i>(in accordance with s. 197.0.7 – RRSSRV)</i>

Vehicle Registration*	Required List of Defects	Circle Check Report	Specific Motor Coach Inspection Report
Vehicles registered in a Canadian jurisdiction other than Québec in which NSC Standard 13 has been implemented <i>(ON, MB, SK, AB, YT, NT, NL, PE)</i>	<ul style="list-style-type: none"> ➤ List from their Canadian province or territory or ➤ List from Standard 13 or ➤ List from Québec 	<ul style="list-style-type: none"> ➤ Contents of the report must comply with section 197.0.3 of the RRSSRV (<i>which is the same as Standard 13</i>) ➤ The report must be valid under the RRSSRV 	Required <i>(in accordance with s. 197.0.7 – RRSSRV)(which is the same as Standard 13)</i>
Vehicle registered in a Canadian jurisdiction, in which NSC Standard 13 has not been implemented <i>(BC, NU, NB, NS)</i>	No list required	<ul style="list-style-type: none"> ➤ Contents of the circle check report: <ul style="list-style-type: none"> ▪ Date ▪ Licence plate or unit number that appears on the registration certificate ▪ Defects detected or, if no defects are detected, an indication to that effect ▪ Driver's name and signature ➤ The report must be valid under the RRSSRV 	Not required
Vehicle registered in an American state	No list required	<ul style="list-style-type: none"> ➤ Contents of the circle check report: <ul style="list-style-type: none"> ▪ Date and time on which the circle check was performed ▪ Licence plate or unit number that appears on 	Not required

Vehicle Registration*	Required List of Defects	Circle Check Report	Specific Motor Coach Inspection Report
		<ul style="list-style-type: none"> the registration certificate ▪ Operator's name ▪ Defects detected or, if no defects are detected, an indication to that effect ▪ Driver's signature <p>➤ The report must be valid under the RRSSRV</p>	

*In the case of combinations of road vehicles, the jurisdiction in which the trailer or semi-trailer is registered is not taken into account. Only the tractor vehicle (truck, tractor, motor coach) is taken into consideration to determine which rules apply.

23. With regard to the circle check, what happens when a Québec-based carrier travels in another Canadian province?

Québec-based carriers travelling on the territory of other Canadian jurisdictions benefit from reciprocity. Circle check regulations in effect in Québec comply with Standard 13 of the National Safety Code established by the Canadian Council of Motor Transport Administrators.

However, there may be certain differences regarding minor and major defects, and it is the operator's responsibility to obtain the necessary information from the jurisdiction concerned.

24. With regard to the circle check, what happens when a Québec-based carrier travels in the United States?

Québec-based carriers benefit from reciprocity concerning the daily inspection of heavy vehicles. **However, there may be certain differences regarding minor and major defects, and it is the operator's responsibility to obtain the necessary information from the jurisdiction concerned.**

Mechanical Component

1. When a vehicle is equipped with two turn signal lights on the right and two turn signal lights on the left that comply with the *Highway Safety Code*, and one of the right turn signal lights is burnt out, is this a minor defect?

No, there is no defect, as the *Highway Safety Code* requires only one turn signal light on the right and one turn signal light on the left. It is highly recommended, however, that the driver indicate this issue in the circle check report.

2. If, during the circle check, a driver did not enter as a defect the fact that a few light-emitting diodes (LEDs) of a headlight don't light up, can he or she be served a statement of offence?

No. During the circle check, drivers must make sure the headlights and lights light up, but they don't have to calculate the percentage of LEDs that don't work.

The calculation of the percentage of LEDs that don't work is, however, part of the mechanical inspection carried out by a carrier enforcement officer or by a road vehicle inspection agent during a mechanical inspection of the vehicle.

3. Is it mandatory to indicate a defect in the circle check report if it concerns a component that does not have to be inspected as part of the circle check?

Since the circle check is the only inspection that is carried out between mandatory mechanical maintenance appointments, we recommend that individuals who carry out circle checks report any defects they detect, even if they concern components that are not subject to the circle check.

4. A heavy vehicle is equipped with two horns. The driver checks both of the truck's horns, and one of them doesn't work. Can the driver be served a statement of offence if he or she has not indicated that fact in the report?

No. If at least one horn is working, the driver does not have to indicate that the other one is not working in the report.

5. Is a rear turn signal light that doesn't work, on a trailer with a GVWR of less than 4,500 kg hitched to a truck with a GVWR of 4,500 kg or more, considered a minor defect?

Yes. Since the trailer has a GVWR of less than 4,500 kg, a rear turn signal light that doesn't work is considered a minor defect.

6. Is it necessary to remove the nut covers to check the wheel fasteners during the circle check?
No.

Mechanical Inspection Component
(PMP, carrier enforcement officers or road vehicle inspection agents)

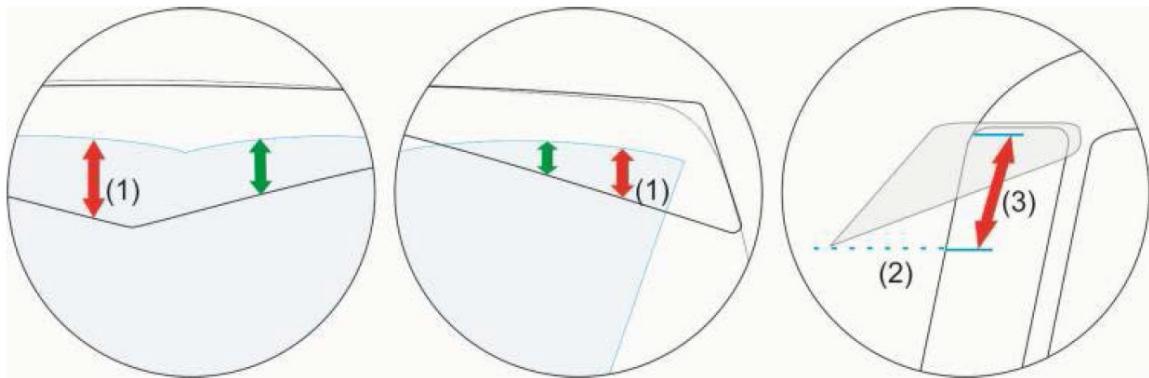
1. Is my outside sun visor compliant with regulatory requirements?

In order for an outside sun visor to be considered non-compliant, it must meet both of the following conditions:

-it extends more than 150 mm below the top edge of the windshield (area 3);

and

-it covers an area of the surface of the windshield that is swept by the wipers (area 1).



2. Do all of the wheel hubs on my vehicle have to be equipped with a sight glass (inspection window) to check the lubricant level?

No, it is not mandatory for the wheel hubs to be equipped with a sight glass (inspection window) to check the lubricant level. The lubricant level only has to be checked if the hub is equipped with a sight glass. Moreover, if a hub cap covers the hub, it does not have to be removed to check the wheel bearing lubricant.

3. With regard to buses, what is the “access device that does not retract completely?”

The “access device” refers to the retractable platform lift for wheelchairs.