

COVID-19: Dealer Permit Holder Business Location Changes

Overview

To adapt to the public health emergency caused by COVID-19, many dealerships are changing their operations to reduce face-to-face contact with the public. Many dealers and salespersons are now adopting new ways of conducting their business online, including working remotely from home or other locations not specified in their dealer permit.

Today, under the [Dealers, Salespersons, and Recyclers Regulation, M.R. 40/2006](#) ('the regulation'), a dealer must display their dealer permit in their places of business, and must display a sign outside their place of business showing the dealer name as set out in their permit. Section 10(5) of the regulation also states that "no person shall carry on business as a dealer at or from a location other than a location shown in his or her permit". The relevant sections are included below.

In recognition of the need for all businesses to adapt during these challenging times, for the purposes of section 10(4) and 10(6) of the regulation, dealers with valid permits have been authorized to:

1. Conduct electronic transactions from a location other than listed on the dealer permit until May 31, 2021.

Example: An offer to purchase, bill of sale, or another required document being emailed to a customer from a location other than the usual operating location of the dealership, such as a home office.

2. Conduct business from an alternate location (as outlined in the example above), without being required to display a sign as required by section 10(2) of the regulation, until May 31, 2021.

We anticipate that dealers will only utilize these electronic transactions when necessary to adapt their business practices in response to COVID-19, and will resume business from their approved operating location listed on the dealer's permit when the public health emergency orders are lifted.

Please note that regardless of the method used (electronic or hard copy), dealers are still expected to provide proper customer documentation, including signed Bills of Sale, Certificates of Inspection (COIs), New Vehicle Information Statements (NVIS), and signed Transfer of Ownership Documents (TODs), as required by the legislation and MPI's business rules.

Manitoba Public Insurance will continue to conduct audits of transactions during this period to ensure compliance with the provisions of The Drivers and Vehicles Act and the regulation.

Legislation

Manitoba Regulation 40/2006 – [Dealers, Salespersons, and Recyclers Regulation](#)

Use of name and place of business

10(1) No person shall carry on business as a dealer in a name other than the name shown in his or her permit.

10(2) A person who carries on business as a dealer must display at his or her place of business a sign, showing the dealer name set out in his or her permit, that is

- (a) at least 27.9 cm wide by 21.6 cm high; and
- (b) legible from outside the place of business.

10(3) If a person carries on business as a dealer at or from more than one place, he or she must display a sign that meets the requirements of subsection (2) at each of the places of business.

10(4) Subsections (2) and (3) do not apply to a person who carries on business temporarily at a location other than a location shown in his or her permit

- (a) for the purpose of a motor show, recreational vehicle show or exhibition; or
- (b) for a purpose approved in writing by the registrar.

10(5) No person shall carry on business as a dealer at or from a location other than a location shown in his or her permit.

10(6) Subsection (5) does not apply to a person who

- (a) carries on business temporarily at a location other than a location shown in his or her permit
 - (i) for the purpose of a motor show, recreational vehicle show or exhibition, or
 - (ii) for a purpose approved in writing by the registrar; or
- (b) has changed his or her business location and has complied with clause 11(a).

Support

If you require additional information, please contact Vehicle Safety at ysi-dealerinfo@mpi.mb.ca or 204-985-0920 (toll-free 1-866-323-0542).

Thank you for your cooperation.