



Department
for Transport

MOT Testing

Government Response to Consultation and Summary of Responses

January 2018

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Ministerial Foreword

I would like to thank all those who responded, both to the consultation and to the Populus survey conducted on behalf of the Department, for their valuable input. I have noted the wide range of views expressed concerning both the proposed changes themselves and their potential economic and road safety implications.



These responses have now been reviewed and considered. After careful consideration, I have decided not to proceed with the changes proposed to the timing of the first MOT test. Great Britain has a comprehensive testing system for vehicles which makes an important contribution to road safety. The changes proposed had potential for both benefits and risks, and after due consideration I do not consider it right to take them forward at this time. This is in the light of the views expressed, the age of some of the evidence base and the potential wider issues associated with testing (such as its relationship with insurance and capability related to safety and environmental outcomes).

While the changes proposed in this consultation will not be taken forward at this time, further research will take place in the near future. This work will help to ensure that the MOT test remains robust and appropriate to the evolving needs of the road transport sector.

A handwritten signature in black ink that reads "Jesse Norman".

JESSE NORMAN MP

Parliamentary Under Secretary of State for Roads, Local Transport and Devolution

1. Introduction

1. MOT testing is an essential tool in the maintenance of vehicle safety and ensures roadworthiness on an annual basis after three years.
2. However, with the advent of modern vehicles and improved technology, as well as significant potential savings for consumers, it was appropriate to review the threshold for a first MOT.
3. The majority of registered vehicles currently require a first MOT three years after manufacture and thereafter every 12 months.
4. The consultation presented three options:
 - i. No change, maintain the current period for vehicles requiring a first MOT at three years.
 - ii. Extend the first MOT for all vehicles currently requiring an MOT at three years, to four years.
 - iii. As Option 2, but excluding vans in Classes 4 and 7, where we will maintain the current MOT three year first test timing.
5. The scope of this consultation covers Great Britain only, as roadworthiness testing is devolved with respect to Northern Ireland.
6. The consultation ran for 12 weeks from 22 January 2017 to 16 April 2017.

7. The Department received 1,970 responses. The responses were from individuals, businesses and other organisations, split as follows:

| Organisation | Number of responses |
|----------------------------|----------------------------|
| Individuals | 1,658 |
| Businesses | 280 |
| Trade bodies | 16 |
| Public bodies | 8 |
| Other organisations/groups | 8 |

8. The questions asked in the consultation are set out in the table below. A detailed summary of responses to these questions is set out in Annex A.

| | |
|----------|--|
| 1 | Do you think the date of the first test should be moved from three to four years? |
| 2 | If testing of vans remained at 3 years, should this include <ul style="list-style-type: none"> - all vans (class 4 and class 7), or - just larger vans in class 7? |
| 3 | What evidence do you think should be taken into account in respect of changes to the first MOT test? |
| 4 | Are the proposals proportionate to the policy objective to balance the burden on consumers while supporting road safety? |
| 5 | What are your views regarding the expected benefits of the proposals as identified in paragraph |

| | |
|-----------|---|
| | 3.3 and addressed in the Regulatory Triage Assessment? |
| 6 | Are the assumptions on savings to the consumer reasonable? If not please provide details. |
| 7 | Are there any other savings or efficiencies we could consider? |
| 8 | What are your views on how garages will be affected by changes in: <ul style="list-style-type: none"> - option 2? - option 3? |
| 9 | Are there any other effects that should be considered? If yes, please provide details. |
| 10 | What relevant published evidence should be included when considering the impact on road safety? |
| 11 | Should the cost of enforcement on large vans be transferred: <ul style="list-style-type: none"> - away from public funds - onto the cost of the MOT inspection? |

9. To ensure that a broad range of views was considered, the Government also commissioned Populus, who surveyed the general public on matters relating to MOT test dates. Populus sampled 3,043 people, both male and female from the ages of 17-65 across Great Britain. All social grades were represented including manual, skilled, managerial and professional occupations.
10. Where appropriate, survey results (hereafter referred to as 'Populus') are quoted to allow comparison with the consultation. Such results are drawn from a sample of people identified as not working in a motor vehicle garage or the MOT testing industry.

2. Government Response

Moving the date of first MOT

1. In response to the first question, the majority of respondents did not support the proposal to move the first MOT from three to four years. Additionally, in response to Question 2, there was a clear majority in favour of retaining the three year rule for all vans in class 4 and class 7. A number of reasons put forward for these views are set out in Annex A.
2. The Populus survey of people not working in a motor vehicle garage or MOT testing similarly fell short of majority support for the proposal, with 43% favouring the change.
3. However, the Government has noted a broad consensus between private individuals and vehicle maintenance professionals on some issues, in particular regarding the potential impact of the proposed changes on road safety. Concerns were noted that potentially unsafe vehicles could remain on road for another year without examination.
4. Although there is some evidence that modern vehicles are better built, and the initial MOT failure rate is declining (suggesting owners are more conscientious), the evidence gathered under this consultation suggests that the additional risk to safety cannot be removed fully.
5. The Government has therefore decided to maintain the current position of a first MOT being required after three years.

Evidence to be taken into account

6. The consultation sought to identify what evidence should be taken into account if changes were made to the first MOT test.
7. Whilst some respondents felt the current system of data collection worked perfectly well, it was apparent that some adjustments were desirable.

8. There was a significant level of interest in further information on the outcome of the first MOT test. Many respondents felt that failure rates should be compared with mileage of vehicles, especially as variable usage will impact accordingly during the first three years.
9. Other respondents believed data relating to accidents involving mechanical failure would improve testing at year three. Such information would also establish the most common vehicle defects causing accidents.
10. The Government accepts the availability of such data would assist the testing of vehicles after three years. Further consideration must be given to the collation, collection and dissemination of such information.

Proportionality of proposals

11. The consultation asked respondents to consider whether the proposals were proportionate to the policy objective, to balance the burden on consumers while supporting road safety.
12. Many respondents believed that paying for an MOT one year earlier was a small price to pay for road safety. Moreover, a three year MOT may give the vehicle owner forewarning of upcoming expenditure, particularly on tyres and brakes.
13. Some respondents, however, believed that the proposals were proportionate; noting that vehicles are better built and that accidents were more likely attributable to driver error than mechanical failure.
14. Views on the proportionality of the proposals were broadly in line with views for or against the proposals themselves.

Savings and benefits of proposals

15. With over 2 million qualifying vehicles registered in 2014, projected savings for consumers were estimated to be in

the region of £100-£109 million, depending on which option was implemented. Some respondents questioned the accuracy of this calculation, while others felt the saving only represented a short term benefit that would in the long term be outweighed by the increased risk to road safety.

16. The majority of respondents did not feel the assumption of savings to the consumer were reasonable. They believed projected savings were marginal or insignificant.
17. The Government recognises that savings for individual consumers may be small, particularly when set against the cost of purchasing and running a vehicle under three years of age. However, large numbers of consumers would be affected.

Impact on MOT garages

18. Respondents noted a significant loss of revenue for MOT approved garages if these proposals were implemented. The MOT testing sector is primarily made up of small and independent garages, which may not be able to absorb such losses. Many respondents noted the potential for redundancies or business closures if the proposals were implemented.
19. The Government is aware of the economic impact on business of any changes to the MOT, and will continue to take this into account in any future decision making.

Evidence in consideration of impact on road safety

20. Respondents identified a variety of evidence they wished to be included. They referred to accident statistics, especially those involving newer vehicles; MOT failure rates in the first year; road safety data from other countries, and accidents causing fatalities/serious injury in vehicles three to four years of age with comparative statistics for vehicles in the first three years.

21. Some respondents expressed concern over figures used in the consultation, particularly those related to road safety implications. For example, some respondents felt that the assumptions made were unreasonable, and that previous DfT publications were more accurate in identifying road deaths and serious injuries.
22. While the Government accepts that there is a range of data available relating to road safety, including historic DfT data, it is not accepted that the data used in the consultation is inaccurate or that the assumptions made therein were mistaken.

Cost of enforcement on large vans

23. The proposal to transfer costs of enforcement against large vans away from public funds and onto an MOT inspection was generally supported by respondents. Large vans are used for commercial purposes, so it was deemed appropriate to impose costs on those who benefit most.
24. However, some respondents believed a study should be undertaken first to assess the impact on small firms. Other respondents felt the prospect of an increase in fee for class 7 may put more vehicles on the road without an MOT.
25. The Government will take these views into account when considering how best to administer enforcement costs, and consult as appropriate in due course. It is not taking forward any changes to test fees, but will amend regulations to allow DVSA to use test fee income from light goods vehicles (i.e. vans) on compliance work relating to these vehicles. This is already the case for large goods vehicles (i.e. lorries).

Annex A: Detailed Summary of Responses

Moving the date of first MOT

Q1 - Do you think the date of the first test should be moved from three to four years?

| <i>Question 1 Summary</i> | <i>Number of responses</i> |
|---------------------------|----------------------------|
| <i>Yes</i> | <i>444</i> |
| <i>No</i> | <i>1,251</i> |
| <i>No Comment</i> | <i>5 [total = 1700]</i> |

1. The majority of responses to this question indicated that the date of the first MOT should not be moved from three to four years. A range of issues were identified in responses, with a significant number raising concerns about the effect of the proposed change on road safety. The incidence of such responses was particularly high where the consultee identified as being involved in the testing industry.
2. Those respondents in favour of the change identified a range of arguments for this. In particular, consultees supporting the proposal were of the belief that the improved build standards and reliability of modern vehicles could support a change in MOT testing.
3. This was challenged by a number of respondents, with some responses noting that while the overall standard and reliability of vehicles may have improved, some safety critical components such as tyres and braking system components are consumable components and do still require regular replacement and maintenance to remain roadworthy.

4. The Populus survey results showed that under half of those surveyed (43%) agreed that the first MOT test should be moved from three to four years. Although a larger proportion than those against the proposal, and an increase in support over the consultation, this obviously remains short of a majority in support of the proposal.

5. However, 69% of those who disagreed with the proposal had concerns regarding safety. This is broadly in line with negative respondents to the consultation.

Populus: Do you agree or disagree that the date of the first MOT test should be changed from 3 to 4 years for cars?

| | |
|----------------------------|-------------|
| Agree strongly | 24% |
| Agree slightly | 19% |
| Sub-total: Agree | 43% |
| Disagree slightly | 14% |
| Disagree strongly | 18% |
| Sub-total: Disagree | 32% |
| Neither/nor | 24% |
| Don't know | 1% |
| Net: Agree | +11% |

Populus: Why do you not agree that the date of the first MOT test should be changed from 3 to 4 years for cars?

This was put to the 32% of respondents who disagreed with the previous question.

| | |
|--|-----|
| Concern that the vehicle would not have been tested for safety | 69% |
|--|-----|

| | |
|---|-----|
| Concern about owners not maintaining their vehicle | 23% |
| The current timescale is sufficient / 3 years is a good period of time to pass before an MOT | 4% |
| The extra year could lead to faults developing | 3% |
| The change does not save consumers very much money | 2% |
| Mileage leads to wear and tear / a lot of mileage can be collected over four years / an extra year | 2% |
| To protect the environment | 2% |
| Even new vehicles can have problems / issues / things wrong with them / manufacturers are not building quality cars | 2% |
| There is no reason to change from the current timescale | 2% |

Moving the date of the first MOT – Vans

Q2 - If testing of vans remained at 3 years should this include all vans (class 4 and class 7)...

| Question 2(a) Summary | Number of responses |
|------------------------------|----------------------------|
| Yes | 1,545 |
| No | 153 |
| No Comment | 272 |

...Or just larger vans in class 7?

| Question 2(b) Summary | Number of responses |
|------------------------------|----------------------------|
| Yes | 422 |
| No | 772 |
| No Comment | 776 |

6. According to Populus, almost half of respondents (45%) did not agree the date of first MOT for vans should be changed to four years. The majority holding such view felt it would have compromised safety, particularly as commercial vehicles do more mileage.

Populus: Do you agree or disagree that the date of the first MOT test should be changed from 3 to 4 years?

| | |
|----------------------------|-------------|
| Agree strongly | 11% |
| Agree slightly | 13% |
| Sub-total: Agree | 24% |
| Disagree slightly | 16% |
| Disagree strongly | 29% |
| Sub-total: Disagree | 45% |
| Don't know | 2% |
| Neither / nor | 29% |
| Net: Disagree | +21% |

7. Within the responses to the consultation, there was significant comment in favour of van testing (class 4 and class 7) remaining at three years. In particular, respondents noted that typical mileage for vans in commercial usage may be significantly higher than for cars.

8. However, other respondents suggested that vehicles in commercial use should be subject to testing even earlier. The main argument for this due to the mileage which these vehicles may typically cover over three years.

9. It was also noted that MOT testing of all vans should be rigorous, although some respondents did support restriction of three year testing to class 7 vehicles.

Evidence to be taken into account

Q3 - What evidence do you think should be taken into account in respect of changes to the first MOT test?

| <i>Question 3 Summary</i> | <i>Number of responses</i> |
|----------------------------------|-----------------------------------|
| <i>Comments Provided</i> | 1,646 |
| <i>No Comment</i> | 324 |

10. A variety of views were expressed by respondents. Many felt that information on results of the first MOT inspection should be considered, while other respondents felt that accident statistics should be taken into account.

11. Respondents also identified vehicle mileage as a key issue to be taken into account in making any changes to the MOT test, and to obtain further information about servicing and the interplay between servicing and the MOT itself.

12. Populus revealed that 72% of those surveyed had their vehicle serviced in the last year. However, over half waited until the day of the MOT to get it done. The survey also asked how often people did a check to ensure their vehicle was in a roadworthy condition. The majority surveyed (60%) checked their vehicle at least once a month. It therefore appears that

people are cognizant of vehicle safety in the period between MOTs.

Populus: Has the vehicle received a service in the last year from a garage?

| | |
|------------|-----|
| Yes | 72% |
| No | 27% |
| Don't know | 1% |

Populus: How often on average do you conduct a vehicle check to ensure your vehicle is in a roadworthy condition?

| | |
|--|-----|
| Before every journey | 4% |
| At least once a week | 21% |
| Less than once a week but at least once a month | 35% |
| Less than once a month but at least once every three months | 19% |
| Less than once every three months but at least once every six months | 8% |
| Less than once every six months | 5% |
| Never | 7% |
| Don't know | 1% |

Proportionality of proposals

Q4 - Are the proposals proportionate to the policy objective to balance the burden on consumers while supporting road safety?

| Question 4 Summary | Number of responses |
|---------------------------|----------------------------|
| Yes | 576 |
| No | 1,277 |
| No Comment | 117 |

13. The majority of respondents to this question believed that the proposals were not proportionate to the policy objective. Concerns were predominantly related to the potential effect on road safety of reducing the incidence of vehicle testing.
14. However, there were some respondents who felt the proposals were proportionate, noting that issues other than roadworthiness were involved in the majority of accidents.

Savings and benefits of proposals

Q5 - What are your views regarding the expected benefits of the proposals as identified in paragraph 3.3 and addressed in the Regulatory Triage Assessment?

15. Although respondents generally agreed with the benefits identified in the Regulatory Triage Assessment, some questioned the long term benefits of the proposals, and the significance of benefits when weighed against the potential safety risks and overall cost of running a vehicle.
16. Populus additionally enquired about the effect of the proposal on car purchasing habits. Their data showed that only one fifth of respondents (22%) would be more likely to buy a new or second hand vehicle that was manufactured in the last four years. It can therefore be concluded the proposal would not be a sufficient incentive to purchase a newer vehicle.

Populus: If the change is made, would it make you more or less likely to buy a new or second hand vehicle that was manufactured in the last 4 years?

| | |
|-------------------------------|------------|
| Much more likely | 9% |
| Slightly more likely | 13% |
| Sub-total: More likely | 22% |
| Slightly less likely | 7% |
| Much less likely | 7% |
| Sub-total: Less likely | 14% |
| Don't know | 1% |
| Neither / nor | 63% |
| Net: more likely | +8% |

Q6 - Are the assumptions on savings to the consumer reasonable? If not please provide details.

| Question 6 Summary | Number of responses |
|---------------------------|----------------------------|
| Yes | 633 |
| No | 1,002 |
| No Comment | 335 [1,970] |

17. The majority of respondents did not agree the assumptions on savings to the consumer were reasonable. It was noted that the level of savings would be affected by the fact that many garages do not charge the maximum permissible fee. As with Question 5 some questioned significance of benefits when weighed against the potential safety risks and overall cost of running a vehicle.

18. Those respondents who agreed with the assumptions as to savings to the consumer generally did not offer substantial comment as to the reasons why.

Q7 - Are there any other savings or efficiencies we could consider?

| <i>Question 7 Summary</i> | <i>Number of responses</i> |
|----------------------------------|-----------------------------------|
| <i>Yes</i> | <i>544</i> |
| <i>No</i> | <i>938</i> |
| <i>No Comment</i> | <i>488</i> |

19. A wide range of responses was received to this question and will be taken into account as part of wider policy considerations.

Impact on MOT garages

Q8 - What are your views on how garages will be affected by changes in option 2 and option 3?

20. Many respondents feared the economic impact of changes in option 2 and 3. It was felt that garages would get fewer customers seeking MOTs and thereby lose business. Garages will ultimately lose revenue and potentially be forced to close.

21. However, other respondents doubted whether the impact on garages would be quite so severe. They felt garages could offset the loss in revenue by offering checks to motorists at a reduced cost. Many MOT test stations are small and proprietor owned and could supplement their income with maintenance work. However, it was generally felt that such changes could affect the viability of garages and cause job losses.

Q9 - Are there any other effects that should be considered? If yes, please provide details.

| Question 9 Summary | Number of responses |
|---------------------------|----------------------------|
| Yes | 642 |
| No | 745 |
| No Comment | 583 |

22. A number of respondents felt there was a lack of knowledge on the part of vehicle owners, and a reluctance to check vehicles between servicing and MOT testing. There was also an over-reliance on the manufacturer's warranty which may potentially hide defects in the vehicle.

23. It was also felt the proposal could affect the perception of vehicle owners' responsibility to maintain the vehicle in a roadworthy condition for an extra year. Vehicle owners often confuse the role of the MOT and services, believing that the MOT ensures that a vehicle is now serviceable for another year.

24. Other respondents highlighted potential impacts on society generally, with an increase in defective vehicles leading to a wide range of issues, including environmental issues.

Evidence in consolidation of impact on road safety

Q10 - What relevant published evidence should be included when considering the impact on road safety?

25. A variety of evidence was suggested by respondents for consideration, including road data from Government, vehicle and aftermarket manufacturers, and other countries.

Cost of enforcement on large vans

Q11 - Should the cost of enforcement on large vans be transferred away from public funds and onto the cost of the MOT inspection?

| Question 11 Summary | Number of responses |
|----------------------------|----------------------------|
| Yes | 762 |
| No | 567 |
| No Comment | 641[1,970] |

26. There was majority support for incorporation of enforcement costs into the MOT. The majority of respondents felt that vans are used for commercial purposes, and as such, the operator not the everyday user should carry the burden of such costs.

27. However, some respondents believed further study was necessary regarding potential impact on small firms. It was also suggested that enforcement is a Government function and should be paid for from Government funds. Others maintained they pay enough tax already, and such cost is easier to spread across taxpayers as a whole.