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# **RoSPA Response to the Department for Transport Consultation Paper: “Extending the Date of the First MOT Test from Three Years to Four Years”**

10 April 2017



Response to "Extending the Date of the First MOT from Three Years to Four Years" Consultation Paper

## Introduction

This is RoSPA's response to the Department for Transport's consultation paper "Extending the Date of the First MOT from Three Years to Four Years". It has been produced following consultation with RoSPA's National Road Safety Committee.

MOT testing was first introduced in Great Britain in 1960 and required cars to pass an MOT 10 years after being registered. In 1967, this was changed to require cars to have their first MOT after three years and annually from then on. Today, MOT tests are carried out by approved testers at over 22,700 approved MOT stations. In 2013/14, more than 29 million MOT tests were carried out, of which almost 2.5 million were for vehicles taking their first test at three years.

In Northern Ireland, and in many EU member states, cars and motorcycles are tested at four years but vans are first tested at three years. In Great Britain and almost half of other EU countries the first MOT must be taken after three years.

The Government has decided to review the timing of the first MOT inspection for vehicles in Great Britain. Modern vehicles have become generally more resilient to wear and tear with improvements in manufacturing techniques and materials, and changing the law so that cars would be MOT tested after four years from registration rather than after three years would save consumers and organisations that operate car and van fleets over £100 million every year.

However, this change would mean a loss of income for MOT businesses, and might increase road safety risks.

Therefore, the Government is seeking views on the following options:

1. No change – keep the requirement for vehicles to pass an MOT three years after registration
2. Change the MOT deadline so vehicles are required to pass an MOT four years after registration
3. Change the MOT deadline so cars and motorcycles are required to pass an MOT four years after registration, but keep the requirement for vans to pass an MOT three years after registration

None of the changes would affect vehicles, such as taxis, passenger vehicles with nine or more passenger seats or public service vehicles, that are currently required to pass an MOT after one year, and then every year afterwards.



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## Question 1

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

#### RoSPA Response

RoSPA thinks that the date of the first MOT test should remain at three years after registration. We do not believe that the potential cost savings justify the potential increased risk of extending the period before a vehicle has to pass its first MOT.

Road crashes and casualties in Britain have fallen substantially, and one of the reasons for this is the current MOT testing regime, which helps to minimise the number of unroadworthy vehicles on our roads.

We agree that modern vehicles are more reliable and that many new vehicle technologies reduce the risk of vehicles crashing and/or reduce the likely severity of those crashes that do occur. However, we do not believe that these road safety improvements justify the risk of increased crashes due to unroadworthy vehicles.

The consultation paper notes that 17% of cars and light vans (below 3,000kg) fail their first MOT test at the three years. In 2015, over 85,000 vehicles failed their first MOT test due to tyre defects, over 47,000 vehicles failed due to brake failures, almost 74,000 failed due to problems with the driver's view of the road, over 3,000 had steering defects and over 6,000 had problems with their seat belt and restraint systems. These are all failures in safety-critical items.

The approach of an MOT date is often used as a prompt by vehicle owners to have their vehicle checked, and if necessary repaired, before the MOT. If the first MOT is changed to 4 years after registration, vehicle owners may wait a year longer before having their vehicle checked and fail to do routine maintenance. This could mean a consequent increase in unroadworthy vehicles on the road and that vehicles with defects would be on the road for a year longer before they are repaired.

Around 19% of vehicles fail their second MOT test at four years. However, these vehicles will have already been restored to a roadworthy condition after their three year MOT test. Therefore, it seems likely to RoSPA that if the first MOT test took place at four years after registration this failure rate would be higher because the vehicle would not have already gone through an MOT test a year earlier, and the additional year would have allowed any existing defects to worsen.

The 2011 TRL report 'Effect of Defects in Road Accidents' predicted that extending the first MOT for cars and vans to four years could result in a possible increase in road deaths and serious injuries. Based on this report, the Impact Assessment for this consultation paper has adjusted the risk of additional casualties and costs using 2015 casualty levels and prices. It predicts between 1.47 and 2.75 additional road deaths, between 18.86 and 35.33 additional serious injuries and between 137.57 and 257.67 additional minor injuries if the date of the first MOT is changed to four years. This would mean additional costs of between £8 million and £15 million.

If the date of the first MOT was changed to four years for cars, but kept at three years for class 4 and class 7 vans, the increases in casualties and costs would be slightly smaller, but would still occur.



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## Question 2

**If testing of vans remained at 3 years, should this include all vans (class 4 and class 7) or Just larger vans in class 7?**

### RoSPA Response

RoSPA believes that all vans, class 4 and class 7, should continue to be subject to an MOT at three years after they were first registered.

Around 36% of Class 7 vehicles (goods vehicles between 3,000kg and 3,500kg) fail their first MOT at the three years and around 37% fail their second MOT test at four years. There is no data on failure rates for smaller class 4 (up to 3,000kg) vans, but the consultation paper estimates that the rates are likely to be similar to the larger class 7 vans.

Vans tend to cover much higher mileages than cars, with the average mileage for vans at three years being over 70,000, compared with around 32,000 for cars. This additional wear and tear on the vehicles increases the risk of safety defects, especially tyre defects, and therefore, increases the risk that changing the date of the first MOT would increase the number of vans being used while they have safety critical defects.

There have been significant increases in the number of vans on our roads, due to the growing popularity of home shopping and internet delivery services, a trend which is likely to continue over the coming year. Therefore, this is the wrong time to weaken the MOT checks for these vehicles.

## Question 3

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

### RoSPA Response

RoSPA believes that the main evidence that should be considered is the likely effect on road safety, especially any increased risk of crashes and casualties, and any increase in vehicles with safety-related defects being used on the road.

Evidence of the potential reduction in MOT businesses, especially in rural or remote areas, due to lost income caused by fewer MOT tests, should also be considered.

## Question 4

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

### RoSPA Response

As outlined in our responses to the questions above, RoSPA does not believe the potential for cost savings to consumers justify the proposals to change the date of the first MOT test from three years to four years.



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## Question 5

**What are your views regarding the expected benefits of the proposals as identified in paragraph 4.3 and addressed in the Regulatory Triage Assessment?**

### RoSPA Response

RoSPA accepts the analysis of the expected benefits, but we do not believe that they justify the proposals to change the date of the first MOT test from three years to four years. However, it is difficult to predict how many consumers and car and van fleet operators would delay vehicle checks and maintenance until the new MOT deadline of four years, but given the pressure on budgets, RoSPA fears that this would inevitably be the case for some people and businesses, and would create consequent risks and costs.

## Question 6

**Are the assumptions on savings to the consumer reasonable? If not, please provide details.**

### RoSPA Response

RoSPA accepts that the assumptions on cost savings for consumers are reasonable, as they take into account the fact that many MOT businesses discount the MOT fee. However, if changing the date of the first MOT to four years results in vehicle owners delaying other vehicle checks and services, this could mean that what would have been relatively minor repairs become more serious defects which are more expensive to repair by the time the four year MOT comes around.

## Question 7

**Are there any other savings or efficiencies we could consider?**

### RoSPA Response

If the MOT deadline was changed to four years, a publicity and education campaign aimed at individual vehicle owners and car and van fleet operators would be needed to emphasise the importance of not delaying normal vehicle checks and maintenance until just before the new MOT deadline.

## Question 8

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

### RoSPA Response

There are over 22,700 approved MOT garages, predominantly made up of small independent garages, and more than 50,000 inspectors throughout the country.

If the requirement for vehicles to have their first MOT test at four years rather than three years was introduced, the consultation paper anticipates that between 7.5% and 8.3% fewer MOTs would be conducted, depending on whether MOTs for class 4 or class 7 vans remained at three years. This would reduce income for MOT garages as they would lose the fee for vehicles that no longer required an MOT Test at three years.



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As MOT businesses usually also carry out routine maintenance and servicing as well as MOT tests, it seems likely that they would also lose income for vehicle maintenance and servicing in preparation for the three year test and for vehicles that failed the three year test.

This may affect the ability for some businesses, especially those remote or rural locations, to retain MOT inspectors and to invest in the specialist equipment they need in order to carrying out MOTs.

As new vehicle technologies are introduced, it is likely that the content of the MOT test will need to change over time to keep pace with changing vehicles. At some point this may require MOT businesses to invest in new equipment and/or staff training. If MOT businesses are losing income due to fewer MOT tests, this may hinder their ability to make these investments.

## Question 9

**Are there any other effects that should be considered?**

### RoSPA Response

The three year MOT is the first opportunity to record a vehicle's mileage, and, as the consultation paper notes, extending the date for the first MOT may, therefore, increase mileage fraud ('clocking').

## Question 10

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

### RoSPA Response

RoSPA believes that the main evidence that should be considered is the impact of the proposals on road safety, using reported road accident and casualty data (including contributory factors data), MOT failure rates and causes, the number of vehicles with safety-related defects being used on the road, and any changes in the number of MOT businesses, especially in rural or remote areas.

## Question 11

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

### RoSPA Response

RoSPA believes that the cost of enforcement for large vans should be transferred to the class 7 MOT fee, as is the case for heavy goods vehicles (over 3,500kgs).

RoSPA thanks the Department for Transport for the opportunity to comment on the proposals. We have no objection to our response being reproduced or attributed.





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