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

**Question 1**

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

**PACTS Response**

PACTS strongly support Option 1 “No change – keep the requirement for vehicles to pass an MOT three years after registration”.

This issue been consulted on and rejected twice in the past six or seven years and we do not see the need for a third exercise and believe there are much more important road policies to focus upon in 2017. This proposal appears to promote the objective of "reducing regulatory costs" above road safety, a prioritisation that we cannot support.

All vehicles deteriorate in service and this can have an adverse impact upon safety and the environment. Roadworthiness testing exists to ensure that at least a minimum level of benefits in a vehicles original design and manufacture are retained in service.

To state that modern vehicles are more reliable and based on this to suggest that MOT testing is less relevant in terms of safety and environmental impacts when a car is 3 years old today (2017) compared with 5, 10 or 15 years ago is unsubstantiated. Comparing a vehicle from 2000 with one sold new today, we believe that they could have different reliability issues, but both will be subject to the same wear and tear of safety critical and after treatment (emission) systems and components. In 2015, approximately 17% of cars and light vans (below 3,000kg) failed their first MOT test at three years. However, many more technically failed, but had defects rectified within one hour after the test, before recording the result on the Vehicle Testing Station (VTS) device (as defined in MOT Testing Guide), so called “Pass with Rectification at Station (PRS)”. PRS defects include safety critical items such as light bulbs, poor visibility and tyres. Therefore, 17% as reported in the consultation paper significantly underestimates the number of vehicle defects that are fixed at three years. It is worth noting that of the 17%, 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

Further, we have concerns about the roadworthiness, reliability and maintenance of modern vehicles Advanced Driver Assistance Systems (ADAS), which are safety critical, but are not part of the MOT test. However, checking at 3 years ensures On Board Diagnostic checks, warning lights and major issues can be noted and reported to the owners.

Further, in light of the public’s increasing concerns over air quality, extending the MOT period could potentially allow vehicles to operate for another 12 months whilst producing harmful emissions and adversely affecting public health and placing increased burden on the NHS.

The approach of an MOT date is a prompt for 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 will increase the number of unroadworthy vehicles on the road.

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. However, these are the minimum costs likely, because of limitations in the available accident data. The authors of the TRL report state that “**However, it must be stressed that these are estimates only and further work would be required before a genuine quantification of the scale of these adverse road safety impacts will be known.”** To our knowledge no further work has been completed.

The additional costs associated with increased vehicle breakdowns (including associated road congestion effects), environmental impacts (including human disease and death caused by harmful emissions) and increased fuel costs if vehicles are running inefficiently without the 3 year check need to be considered too.

**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?**

**PACTS Response**

PACTS strongly support Option 1 “No change – keep the requirement for vehicles to pass an MOT three years after registration”. The reasons for this are given in question 1.

Further, 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. This trend is likely to continue and it is therefore 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?**

**PACTS Response**

Any evidence that drivers find the MOT at 3 years to be burdensome or that the public are seeking this change must be demonstrated.

The 2011 TRL report highlights the adverse effects for road safety, but clearly says that a further more in-depth investigation is required. Similar evidence must be identified to understand the likely effects of increased breakdowns and associated congestion and the harmful air quality implications.

**Question 4**

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

**PACTS Response**

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

**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?**

**PACTS Response**

Although there are expected benefits, we do not believe that they justify the proposals to change the date of the first MOT test from three years to four years. 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, PACTS warns that this would be inevitable for some people and businesses, and would create consequent risks and costs, which are unknown.

**Question 6**

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

**PACTS Response**

The assumptions on cost savings for consumers are not reasonable because they do not take account of additional cost associated with potential vehicle failures and breakdowns that would have been prevented if a three year check had taken place. In other words, relatively minor repairs at three years could have become much more serious and expensive by four years or resulted in a failure or breakdown. This could include a vehicle running for an extended period whilst producing excessive tailpipe emissions.

**Question 7**

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

**PACTS Response**

If the MOT changed from three to four years, good regulation governance would require an evaluation of vehicle safety and emissions through spot checks, both before and after the change to evaluate the implications and to understand the extent of the harm caused. This would also require additional monitoring of police fatal collision investigations to identify which fatalities were associated with the relaxation of the rules. There could be additional court costs associated with prosecutions for drivers and companies operating unroadworthy vehicles and this would need to be understood and managed within the justice system.

To help the public and fleet operators to maintain their vehicles it would be important to run a publicity and education campaign aimed at informing them of the importance of routine vehicle maintenance and their responsibilities - not just relying on the new MOT deadline.

**Question 8**

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

**PACTS Response**

Garages will be adversely affected and this could have knock-on effects for consumer choice if some choose not to offer MOT testing anymore. This could favour the large OEM approved garages and workshops over smaller independent operators as consumers may choose to service their vehicles with a dealer when an MOT is not required.

**Question 9**

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

**PACTS Response**

PACTS believes that this consultation is missing today’s big issues. By discussing whether vehicles should be tested at three or four years, this misses the more fundamental points, namely whether the MOT system and checks are relevant for our modern vehicles and how they potentially should be updated? There are many challenges we face, not least with in-vehicle data and how modern vehicles will manage their ‘health’ through on board encrypted diagnostics. Reference should be made to international activity in this area and the opportunity to harmonise with other UN countries through WP29.

Also it is important to consider the potential for more cars to be ‘clocked’ because the checking will be less frequent and associated vehicle crime.

**Question 10**

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

**PACTS Response**

PACTS recommends that the next steps with regard to MOTs should be to help future proof the vehicle repair/maintenance and testing sector for the rapid evolutionary changes in technology that we are witnessing, for example with ADAS and other electrical and electronic features. Modern vehicles are now more software based than mechanical and this trend will continue. In addition vehicle cameras and sensors are becoming standard and these need to be maintained and tested to maximise their safety potential. Further, engines and exhaust systems with complex after treatment systems need to be monitored and tested to ensure that the emissions do not deteriorate over the vehicles life. Reference should be made to international activity in this area and the opportunity to harmonise with other UN countries through WP29.

Information on vehicle breakdown and roadworthiness and public health and air quality associated with infrequent servicing and testing of vehicles should also be referenced.

**Question 11**

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

**PACTS Response**

At the time of writing, PACTS does not have a view on this question.