



Department
for Transport

Consultation

MOT – Extending the date of the first MOT test from three years to four years

DfT-2016-17

January 2016

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Contents

Foreword	3
Executive summary	5
How to respond	7
The proposals	8
The options for changing the timing of the first MOT.....	12
Exploring the Benefits and Impacts.....	14
Transfer of enforcement costs.....	23
Consultation questions	27
What will happen next	28
Annex A Impact assessment.....	29
Annex B Consultation principles	28

Foreword



This consultation seeks views about changing the date of the first “MOT” (Ministry of Transport) test in Great Britain for cars, motorcycles and vans from when they are three years old to four years. The content of the tests would not be changed by these proposals. There are no changes being consulted on about cars, vans and motorcycles aged four years or more, with most of these vehicles needing an annual MOT test.

Although many rules related to MOT testing apply to the UK through its current membership of the European Union (EU), the changes being consulted about in this document will not be affected by the UK’s exit from the EU.

The MOT test originated in 1960, with the three year date for the first test being introduced in 1967. Northern Ireland operates a four year date for cars and motorcycles and three years for vans. Many other European countries, including France, Ireland, Italy and Spain, as well as Denmark and Norway (which are amongst a group of countries alongside the UK with very good road safety records in Europe¹), have the first test at four years. Others such as Germany, the Netherlands and Sweden start testing at three years. France, Germany and Denmark require testing every other year after the initial test.

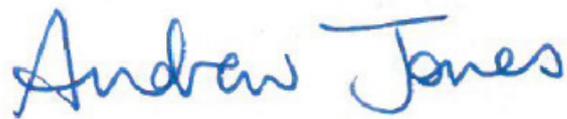
The consultation includes some information about the possible risks of changing the age when MOTs are needed and the other effects including reductions in time spent and fees paid for the tests. Safety improvements applied to new vehicles continue to improve public safety as older vehicles are replaced. Improvements to safety standards for new cars continue to be

¹ The British Road Safety Statement of December 2015 (figure1) illustrates recent comparative figures https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/487704/british_road_safety_statement_print.pdf

implemented, with the UK Government taking an active role in international negotiations to secure more.

Safer vehicles are one of five areas identified in the British Road Safety Statement where the Government is taking action alongside many others. For example, it is legislating for connected and autonomous vehicles and tackling further the distraction caused by hand held mobile phone use.

I look forward to reviewing the responses received to this consultation.

A handwritten signature in blue ink that reads "Andrew Jones". The signature is written in a cursive style with a large initial 'A' and 'J'.

ANDREW JONES MP

Parliamentary Under-Secretary of State for Transport

Executive Summary

- 1.1 This consultation document is seeking views on whether the timing of the first MOT test should be extended from three to four years after first registration. Currently over 2.5 million vehicles are inspected for their first MOT every year.
- 1.2 With more modern vehicles and improved technology, it now seems appropriate to review the threshold for the first MOT, a threshold that was introduced in the 1960s.
- 1.3 The options in the consultation look at making no change from the current position; extending the MOT deadline to four years for all vehicles currently receiving a first test three years after first registration; and extending the MOT deadline to four years while retaining the three year requirement for small goods carrying vehicles² (which for the purpose of the consultation we will refer to as ‘vans’ in the remainder of this document).
- 1.4 Extending the first test requirement to four years would introduce a saving to consumers of over £100 million every year. The consultation also considers the wider impacts of such a change. More than 29 million MOTs are carried out at over 22,000 garages every year. These MOT businesses would be likely to incur a loss of income from any reduction in tests. There are also considerations around road safety to be made. We have also included possible effects on the environment.
- 1.5 The Driver and Vehicle Standards Agency (DVSA) carries out enforcement checks on vans (goods carrying vehicles). Unlike the enforcement of heavy goods vehicles (which is paid for as part of the HGV test fee), these checks are funded from public money. We are taking the opportunity in this consultation to seek feedback on whether those

² Small goods carrying vehicles includes goods vehicles in class 7 (between 3,000 and 3,500kgs maximum gross vehicle weight) and class 4 goods vehicles (below 3,000kgs maximum gross vehicle weight). Dual Purpose Vehicles in class 4 are considered as cars in the context of this proposal.

enforcement costs should be met through additional charges embedded in the MOT fee for those vehicles.

- 1.6 It should be noted that separately from the proposals set out here, we are considering the appropriateness of the current MOT test fees. We hope to consult separately on test fees in 2017.
- 1.7 We are naturally keen to have a wide range of responses to the consultation, bearing in mind the significance that possible changes may have for stakeholders.

How to respond

The consultation period began on 22 January and will run until 16 April 2017. Please ensure that your response reaches us before the closing date. If you would like further copies of this consultation document, it can be found at <https://www.gov.uk/government/policies/road-safety> or you can contact Paul Wainwright with the details below if you would like alternative formats (Braille, audio CD, etc.).

If you wish to respond electronically, please email:

MOT411consultation@dft.gsi.gov.uk

Or complete the online survey which can be found here:

<https://www.smartsurvey.co.uk/s/H8EJR/>

If you wish to respond in writing, please address your response to:

Paul Wainwright
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3/28 Great Minster House
33 Horseferry Road
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Tel: 020 7944 2237

When responding, please state whether you are responding as an individual or representing the views of an organisation. If responding on behalf of a larger organisation, please make it clear who the organisation represents and, where applicable, how the views of members were assembled.

Freedom of Information

Information provided in response to this consultation, including personal information, may be subject to publication or disclosure in accordance with the Freedom of Information Act 2000 (FOIA) or the Environmental Information Regulations 2004.

If you want information that you provide to be treated as confidential, please be aware that, under the FOIA, there is a statutory Code of Practice with which public authorities must comply and which deals, amongst other things, with obligations of confidence.

In view of this it would be helpful if you could explain to us why you regard the information you have provided as confidential. If we receive a request for disclosure of the information, we will take full account of your explanation, but we cannot give an assurance that confidentiality can be maintained in all circumstances. An automatic confidentiality disclaimer generated by your IT system will not, of itself, be regarded as binding on the Department.

The Department will process your personal data in accordance with the Data Protection Act (DPA) and in the majority of circumstances this will mean that your personal data will not be disclosed to third parties.

1. The Proposals

Background

- 2.1 Motorists are required to maintain their vehicles in a roadworthy condition at all times when used on the road. This helps to keep our roads safer and helps to protect the environment.
- 2.2 To promote road safety, the Government requires that vehicles are subject to a roadworthiness inspection on a periodic basis. For cars, motorcycles, minibuses and vans, this is known as the MOT.
- 2.3 In GB the first MOT test is required for a car, motorcycle or van three years after it is first registered and then annually thereafter. The items that are to be tested at an MOT inspection are set at European level. This consultation does not consider the items to be tested at an MOT inspection, it is about when vehicles should be first tested. Many testing schemes in other European states operate a first test threshold of four years for most vehicle types (see Table 1).
- 2.4 In Northern Ireland, cars and motorcycles are tested at four years whilst vans are first tested at three years of age.

Table 1 - Current first annual test requirement in some other European countries.

Country	Year 2	Year 3	Year 4
Belgium			X
Denmark			X
Germany		X	
Greece			X
Spain			X
France			X
Ireland			X
Italy			X
Luxembourg		X	
Netherlands		X	

Austria		X	
Portugal			X
Finland		X	
Sweden		X	
Czech Republic			X
Estonia		X	
Hungary			X
Latvia	X		X
Lithuania		X	
Poland		X	
Slovakia		X	
Romania			X
Slovenia		X	
Norway			X
Croatia			X
Cyprus			X
Malta			X
Bulgaria		X	

2.5 Section 47 of the Road Traffic Act 1988 prescribes the period when a first MOT inspection is required in Great Britain. The MOT class, vehicle type and the required date of the first MOT is depicted in table 2 below.

Table 2

Class	Description	First MOT required in years
1&2	Motorcycles	3
3	3 wheeled vehicles not more than 450kg unladen weight	3
4	Cars, passenger vehicles, motor caravans and dual purpose vehicles in all cases with up to eight passenger seats.	3
	Smaller vans (goods vehicles not exceeding 3,000kgs)	3
	Taxis and ambulances in either case with up to eight passenger seats.	1

4A	Passenger vehicles, ambulances and dual purpose vehicles with nine to twelve passenger seats	1
5	Passenger vehicles, ambulances and dual purpose vehicles with thirteen or more passenger seats	1
6	Public Service vehicles (PSV)	1
7	Larger vans (goods vehicles over 3000kgs up to and including 3500kgs)	3

- 2.6 We are not proposing to make any changes to the first MOT test for vehicles requiring a first MOT after one year.
- 2.7 MOT testing was first introduced in GB in 1960 when cars were first inspected 10 years after registration. In 1967 MOT testing was changed so that the first test was carried out on a car after three years and then annually thereafter.
- 2.8 In more recent years, modern vehicles have become generally more resilient to wear and tear with improvements in manufacturing techniques and materials, and it now seems appropriate to review the timing of the first MOT inspection for those vehicles requiring a first test at three years.
- 2.9 Vans are in MOT class 4 if they are below 3,000kgs, and in MOT class 7 if they are between 3,000kgs and 3,500kgs.
- 2.10 MOT tests are carried out at approved MOT stations by approved testers. Currently there are over 22,700 approved garages in GB. In 2013/14, more than 29 million MOT tests were carried out, of which almost 2.5 million were for a vehicle requiring a first test at three years.
- 2.11 Enforcement of the MOT scheme is undertaken by the Driver and Vehicle Standards Agency (DVSA). Vehicle examiners check that standards are maintained at MOT stations and take disciplinary action where there are failings. This enforcement, the cost of running the MOT IT system and other administration is funded through a 'slot fee' paid by garages that is then passed on as part of the cost of the MOT paid by the motorist.

- 2.12 DVSA vehicle examiners also inspect class 7³ vehicles at the roadside and prohibitions are issued where vehicles are found to be unroadworthy. This enforcement is currently paid for from general taxation. In this consultation we are also exploring whether there should be any increase in the MOT “slot fee” for class 7 vehicles to transfer the enforcement cost from the general public to the vehicle users.
- 2.13 At this stage, we are only seeking feedback on the principle of this approach, with implementation at a later stage when we look at MOT fee reform more broadly.

³ Class 7 are small goods vehicles between 3,000 and 3,500kgs maximum gross weight.

2. The options for changing the timing of the first MOT test

2.1 This consultation seeks views on whether there should be a change to the period of the initial MOT test extending it from three years to four years; and whether that change should apply only to cars and motorcycles.

2.2 The options being proposed are:

Option 1	No change, maintain the current period for vehicles requiring a first MOT at three years.
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Option 2	Extend the first MOT for all vehicles currently requiring an MOT at three years, to four years.
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Option 3	As Option 2, <u>excluding</u> vans in classes 4 and 7, where we will maintain the current MOT three year first test timing.
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2.3 The Government preference is for either Option 2 or Option 3.

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

Q2. If testing of vans remained at 3 years, should this include:

- all vans (class 4 and class 7)?
- just larger vans in class 7?

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

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

2.4 Any changes would require an amendment to legislation. Option 2 would be fairly straightforward with an amendment to by regulations. Option 3 however will require a more substantial change to primary legislation that will require a Legislative Reform Order (LRO) or new primary legislation clauses.

2.5 The LRO would allow for changes to primary legislation to be made independently of a Parliamentary Bill. LROs are used to remove burdens, and are made under the powers of the Legislative and Regulatory Reform Act 2006. However, the legal scrutiny, processes and timescales can be comparable to that of a Bill.

3. Exploring Benefits and Impacts.

3.1 A Regulatory Triage Impact Assessment is provided at Annex A.

Cost Saving to Motorists

3.2 An extension to four years will bring a benefit to consumers who would make a saving on the cost of the test. This saving is not known precisely because whilst the fee can be anything up to a maximum of £54.85 for a car, many garages do offer a lower, more competitive fee and the average indicated by trade bodies is thought to be around £45 per test. We have used this £45 figure to calculate potential savings.

3.3 Vehicles registered in 2013 (detailed in the table below) may be the first that would be affected by any changes (depending upon the exact implementation timing).

Table 3

Vehicles type	Numbers registered in 2013
Motorcycle	86,000
Car	2,230,000
Class 4 Goods Vehicle (below 3,000kgs)	166,000
Class 7 Goods Vehicle (between 3,000kgs and 3,500kgs)	108,000

Savings to consumers are anticipated to be in the region of £109 million should option 2 be introduced, and around £100 million if option 3 was implemented.

- 3.4 In addition to the cost of the MOT inspection itself, there could be a value in saving the personal time taken in driving a vehicle to an MOT garage. However, increasing the period for the initial test will not change the requirement on motorists to maintain their vehicle to a roadworthy standard, and visits to garages for regular maintenance or servicing checks will still be required. Time saved has therefore not been taken into account when assessing the cost savings in this case.
- 3.5 Businesses operating large fleets of vehicles will also see an advantage in moving the first test to 4 years, saving time by not having to deal with the paperwork and planning for MOTs at year three.
- 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?**
- Q6. Are the assumptions on savings to the consumer reasonable? If not, please provide details.**
- Q7. Are there any other savings or efficiencies we could consider?**

Impact on MOT Garages

- 3.6 The MOT testing industry is predominantly made up of small independent garages. There are over 22,700 approved garages and more than 50,000 inspectors throughout the country. Garages are authorised to test specific classes of vehicle.
- 3.7 Any extension to the first test period would result in lost revenue to MOT garages as they would lose the fee for those vehicles no longer requiring the three year test. Many MOT businesses are small or micro operations, usually carrying out routine maintenance and servicing as well as MOT testing. Garages affected by a loss in revenue will need to look at options for utilising the freed up resource from doing fewer tests, and may face transitional costs associated with new work or services implemented to fill that gap. Motorists will still be required to keep their vehicles in a roadworthy

condition and therefore necessary repairs would still need to be made.

- 3.8 It is anticipated that the annual reduction of the total number of MOTs undertaken would be as follows:

Option 2 would result in 8.3% fewer MOT tests.

Option 3 would result in 7.5% fewer MOT tests.

These figures are based on the number of first tests as a percentage of overall MOT tests carried out in 2013/14.

- 3.9 MOT standards require the use of specialist equipment which the garage must install for carrying out MOTs. The impact of carrying out fewer tests will mean that it will take a longer period of time before this equipment pays for itself, although most of this equipment would be able to be used for fault diagnosis, voluntary safety checks or in support of vehicle repairs.

- 3.10 A reduction in MOTs may affect the ability for some businesses to retain MOT inspectors and they may face one-off costs in having to make staff reductions. This may also have an effect on the viability of garages in remote or rural locations.

Q8. What are your views on how garages will be affected by changes in:

- option 2?

- option 3?

Q9 Are there any other effects that should be considered?

The Wider Road Safety Context

- 3.11 In 1970, soon after the requirement for an MOT test at three years had been introduced in 1967, 7,499 people were reported as being killed on Great Britain's roads. In 2015 there were 1,730, the second lowest figure on record and 45% fewer than a decade earlier, in 2006. Work done for the

Strategic Framework for Road Safety (May 2011)⁴ included a central projection of road deaths falling by about 3.5% per year this decade and deaths and serious injuries by about 4%. Historically, improved vehicle safety has been a major contributor to the improvements.

- 3.12 The MOT was introduced to help ensure vehicles are maintained in a safe roadworthy condition. However new cars are becoming safer, including through automated systems to help advise the driver on roadworthiness issues, such as tyre pressure monitoring. Improvements to safety standards for cars are continuing to be implemented, with the UK Government taking an active role in international negotiations to secure changes for new cars, including electronic stability control, braking, pedestrian protection and seat belt reminders.
- 3.13 Many of the new crash avoidance and injury mitigation technologies are already entering the market, driven by consumer information and competition between vehicle manufacturers to develop increasingly safer vehicles.
- 3.14 In relation to the regulation of tyres and braking (two key issues at MOT) there have been recent safety improvements including:
- tyre pressure monitoring has been required for new cars since November 2014, enabling drivers to be aware of low tyre pressures and take action;
 - from the same date there are minimum performance standards for new tyres related to grip in the wet;
 - lane departure warning and advanced emergency braking on new large vehicles became mandatory in November 2015.
- 3.15 There is also a challenging international regulatory programme to mandate such technologies, including:

⁴ The Strategic Framework for Road Safety (Department for Transport, May 2011) is published at <https://www.gov.uk/government/publications/strategic-framework-for-road-safety>

- 2 years from now – extending the fitment of seat belt reminder systems to more seating positions and vehicle types.
- 4 years - implementation of Advanced Emergency Braking (AEB) for cars and light goods vehicles, Lane Keep Systems together with enhanced frontal and side impact crash requirements.
- 6 years - Intelligent Speed Adaptation (ISA)
- 8 years - improvements in the existing pedestrian protection requirements, including the detection of pedestrians and the capability to reacting automatically to avoid the collision.

3.16 Connected and autonomous vehicles will also enable further safety improvements given that driver error is reported as a factor in almost all collisions. The Department is working to ensure there are no regulatory barriers to the safe roll out of this technology and that appropriate safety provisions are in place.

3.17 Other safety-related policy measures have been consulted on. These include changes to the car practical driving test, consulted on over July and August 2016. These changes are intended to ensure the test reflects modern driving practices. DVSA believes there is a potential for at least a 1% reduction in road casualties. In monetary terms, this is equivalent to some £8 million in the year after introduction. Subject to consultation and the outcome of a research trial being undertaken to evidence the impact of the proposed changes, it is planned to implement the revised test in 2017.

3.18 A consultation was launched by the Department for Transport in January this year to seek views on increasing the fine for using a hand held mobile phone whilst driving from £100 to £150 for all vehicles. It sought views about increasing the penalty points from 3 to 6 for HGVs and vehicles adapted to carry more than 8 passengers and from 3 to 4 for all other vehicles. Ministers have announced that they will increase the fixed penalty from £100 to £200 and raise the penalty points from 3 to 6 for all drivers.

Diversory courses will no longer be offered to first time offenders. The Government's aim is to raise awareness of the seriousness of the offence and provide a stronger deterrent for potential offenders.

- 3.19 The plans build on recently implemented road safety measures, including improved laws to combat and deter drug driving. The central forecast for this measure (which came into effect in 2015) is for it to reduce fatalities by about 4 per year and serious injuries by about 17 per year. Improvements have also been introduced over the last few years related to the enforcement of drink driving, careless driving, dangerous driving and un-insured drivers and to driver training.

Road Safety Effects

- 3.20 Road safety is everyone's responsibility. Any extension to the first test does not affect the requirement for motorists to ensure that their vehicle is properly maintained at all times. However, some motorists may be influenced by the MOT deadline and are only then incentivised to have their vehicle properly checked and serviced to ensure it is safe.
- 3.21 In 2015 the failure rates for all class 4 vehicles (cars and light vans below 3,000kgs) at the three year MOT test was around 17%, at four years it was 19%. Class 7 vehicles have a higher failure rate at the three year test of 36% and 37% at four years. Although there is no extractable data on failure rates for class 4 vans, sources in the sector have indicated that class 4 van failure rates are thought to be similar to the larger vehicles in class 7.
- 3.22 At year three, the average cumulative mileage for a car is around 32,000. Vans have an average mileage that is over 70,000.
- 3.23 It is worth noting that the current MOT failure rate for vehicles at four years cannot be used as an indication of the failure rate at four years if it was to be the first test. This is because vehicles being tested at four years will have been restored to a roadworthy condition after the three year MOT test.

3.24 Statistical information produced by DVSA on MOT failure items at around three years shows that for cars it is lamps, reflectors and electrical equipment that are by far the most common defect at the three year test.

Table 4 – Class 4 vehicles around age 3, tested in 2015

	Tests	Initial Failures
	1,937,188	328,916
Body, Structure and General Items		3,365
Brakes		47,138
Drivers View of the Road		73,883
Driving Controls and Speed Limiters		-
Exhaust, Fuel and Emissions		6,786
Items Not Tested		661
Lamps, Reflectors and Electrical Equipment		143,413
Motor tricycles and quadricycles		6
Registration Plates and VIN		13,369
Road Wheels		3,345
Seat Belts and Supplementary Restraint Systems		6,164
Steering		3,425
Suspension		24,628
Towbars		55
Tyres		85,720

3.25 Given the significant difference in mileage, and the fact that vehicles generally deteriorate in service, we are keen to hear views on whether it is appropriate to retain the three year first test deadline for all vans (class 4 and 7), or whether keeping tests at three years should just apply just the larger vans over 3,000kgs (class 7).

3.26 An MOT test pass verifies that a vehicle meets a specified standard of safety at the time of testing. It does not mean that the vehicle will remain safe for any period. Defects, including serious faults, can occur at any time to a vehicle.

3.27 Some vehicle owners may not keep on top of basic maintenance requirements if they do not have the deadline of the MOT to influence them. Research carried out on behalf of the Department for Transport in 2011 by Transport Research Laboratory (TRL) produced the report 'Effect of Defects in

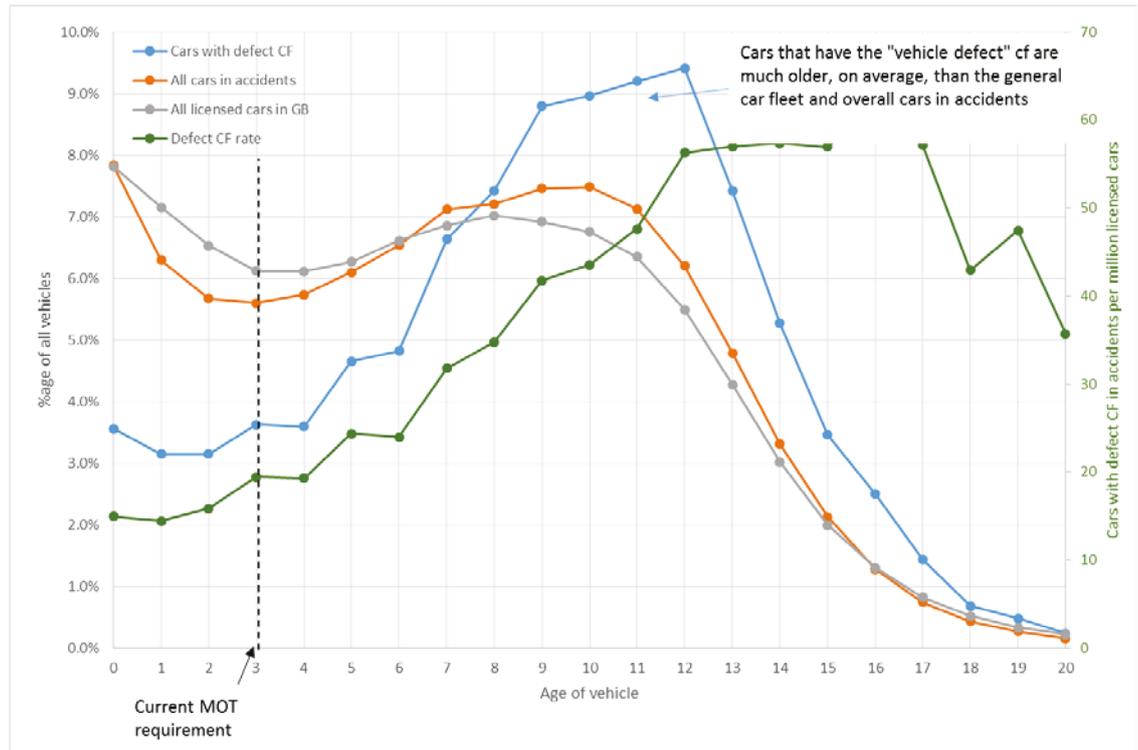
Road Accidents'⁵. The TRL report explores the impact that different test frequencies may have upon road safety.

- 3.28 The study estimated that vehicle defects are likely to be a contributory factor in around 3% of road accidents although there is no established link between MOT measured roadworthiness and vehicle defects contributing to accidents.
- 3.29 The TRL report authors are careful to caveat conclusions on road casualties and state that some assumptions have had to be made due to the lack of precise data. They have provided both high and low predictions given the uncertainty around public reaction to a change in the timing of the first MOT. They assume a diverse range of responses. Some people may be influenced by a change in the first MOT timing and fail to undertake even routine maintenance, which could result in safety critical defects on the vehicle. Conversely the public may follow the law and keep their vehicles in a safe condition regardless of the MOT timing.
- 3.30 TRL predicts that extending the current three year inspection for cars and vans to four years, could result in a possible increase in road casualties ranging between 1.89 and 3.53 fatalities, and 20.96 and 39.26 serious injuries per year based on 2009 casualty levels. To give these figures some context, this would equate to around a 0.1% increase in both fatalities and serious injuries. It is important to note that the method used to make the prediction uses a relatively simple approach and there are a number of confounding factors, not least that other events could trigger a repair or replacement part to be fitted before the MOT date.
- 3.31 Since the TRL report was written, road casualty figures have decreased. Fatalities in 2015 were 22% lower than 2009 and serious injuries were 10% lower. It is likely, therefore, that the TRL estimates would be reduced to between about 1.47 and 2.75 fatalities, and 18.86 to 35.33 serious injuries if calculated for 2015.
- 3.32 The main source of statistical information about accidents resulting in injury or death in Great Britain is the STATS 19 database. 2015 information indicates that vehicle defects

⁵ <http://www.ewu.edu/Documents/CBPA/NWTTAP/Newsletter/Publications/PPR565.pdf>

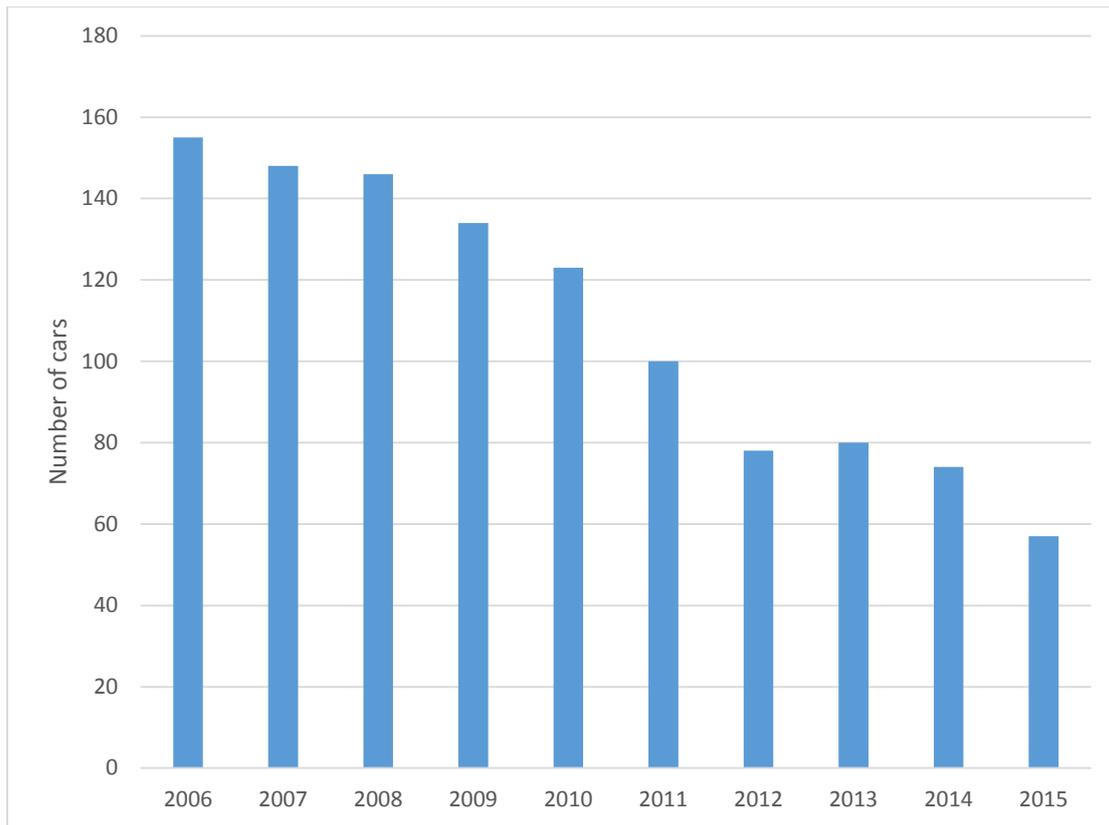
contributing to road casualties do not increase where the vehicle is either three or four years old, remaining at 3.6%. A graphical illustration is provided below showing that as cars get older that they have a significantly higher chance of a defect contributing to a road accident.

Table 5 - Based on Reported Road Accident data for 2013-2015



3.33 Over the last 10 years vehicles have generally become more reliable with higher quality components and less likely to have defects contributing to an accident. Table 7 illustrates that since 2006, the number of cars that were 3 or 4 years old in personal-injury accidents, where defects were a contributory factor, has declined from 155 to 57.

Table 6 - Cars that were 3 or 4 years old involved in personal injury accidents, where vehicle defects were a contributory factor



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

Other Impacts

- 3.34 Extending the date of the first mandatory test is not expected to have any noticeable effect on the environment. Currently only 1% of vehicles fail their MOT due to fuel and exhaust defects
- 3.35 The three year MOT is the first opportunity for a vehicle to have its mileage officially recorded. We are aware of concerns within industry that extending the date for the first inspection may increase mileage fraud (known as ‘clocking’) where the vehicle’s mileage is wound back leading to a vehicle’s history being misrepresented at the point of sale.

Impact upon Government Agencies

- 3.36 The Driver and Vehicle Standards Agency (DVSA) administers and monitors the MOT scheme. To recover the

cost of this it charges a 'slot fee' from the test fee paid to garages for every vehicle test pass. Extending the first test period to four years will result in fewer tests and therefore DVSA losing the slot fee earned from the current 3 year tests.

3.37 If Option 2 was introduced, DVSA would incur an expected loss of £5 million per annum. Option 3 would result in a loss of £4.5 million per annum.

3.38 The Driver and Vehicle Licensing Agency (DVLA) would be required to make changes to IT systems with any change to the first test date. Currently, when vehicle excise duty is being purchased, the DVLA system will check against the DVSA MOT system that there is a valid MOT in force. The DVLA IT system will need to be amended to recognise a new four year threshold. This is likely to be a fairly straightforward process if Option 2 is introduced and all vehicles move to four years, but it will be more complicated and time consuming if the vehicle types have separate timings as per Option 3.

4. Transfer of Enforcement Costs

- 4.1 For heavy goods vehicles (over 3,500kgs) the cost of enforcement is paid for by the heavy goods vehicle testing fee, for class 7 vehicles this enforcement is paid for from the public purse.
- 4.2 DVSA enforcement on large vans costs around £2 million per year. We welcome views on funding for van enforcement, and whether the cost should be recovered from the class 7 MOT fee. The details of how costs could be recovered from the fee would need to be determined. This may include consideration of an increase on the MOT fee, which is likely to cost around £3.25 per class 7 test. At this stage, we are only seeking feedback on the principle of an approach to recover enforcement costs from the fee. We will consult on any specific proposals at a later stage.

Q11. Should the cost of enforcement on large vans be transferred:

- away from public funds?
- onto the cost of the MOT inspection?

Consultation Questions

- Q1. Do you think the date of the first test should be moved from three to four years?**
- Q2. If testing of vans remained at 3 years, should this include:**
- all vans (class 4 and class 7)?
 - just larger vans in class 7?
- Q3. What evidence do you think should be taken into account in respect of changes to the first MOT test?**
- Q4. Are the proposals proportionate to the policy objective to balance the burden on consumers while supporting road safety?**
- 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?**
- Q6. Are the assumptions on savings to the consumer reasonable? If not please provide details.**
- Q7. Are there any other savings or efficiencies we could consider?**
- Q8. What are your views on how garages will be affected by changes in:**
- option 2?
 - option 3?
- Q9. Are there any other effects that should be considered? If yes, please provide details.**
- Q10. What relevant published evidence should be included when considering the impact on road safety?**
- Q11. Should the cost of enforcement on large vans be transferred:**
- away from public funds?
 - onto the cost of the MOT inspection?

What will happen next?

A summary of responses, including the next steps, will be published within three months of the consultation closing. Paper copies will be available on request.

Annex A - Impact assessment

When responding to the consultation, please comment on the analysis of costs and benefits, giving supporting evidence wherever possible. Please also suggest any alternative methods for reaching the objective and highlight any possible unintended consequences of the policy, and practical enforcement or implementation issues.

Rationale for intervention and intended effects

The purpose of MoT vehicle testing is to reduce the risk of unsafe vehicles being used on the roads, helping to ensure that motorists maintain their vehicles to meet minimum safety and environmental pollutant standards.

In GB, the first MOT test is undertaken on cars, motorcycles and small goods vehicles⁶ (mostly vans) when a vehicle is three years old, as prescribed by Section 47 of the Road Traffic Act 1988.

The current three year test requirement was implemented in the late 1960s and in view of improvements in vehicle technology and maintenance, we propose to review whether the current status continues to provide value to the consumer, and remains proportionate in catering for the differing risk factors across the vehicle groups. With the reduced risk of vehicle failure, the need to test new vehicles at three years may be diminished, meaning a regulatory burden can be removed.

Viable policy options (including alternatives to regulation)

Option 1 is to have no change. The options for change being considered are;

Option 2: Extend the initial MOT for all vehicles currently requiring an initial MOT at three years to four years.

This would mean that all cars, motorcycles, and small goods vehicles would not require any form of official roadworthiness testing until the vehicle was four years old.

Option 3: As Option 2 excluding goods vehicles in classes 4 and 7 where we will maintain the current MOT three year first test timing.

⁶ Small Goods Vehicles includes goods vehicles in class 7 (below 3,500kgs maximum gross vehicle weight) and class 4 goods vehicles (below 3,000kgs maximum gross vehicle weight). Dual Purpose Vehicles in class 4 are considered as cars in the context of this proposal.

This would see cars and motorcycles moving to a four year first test timing, whilst all small goods vehicles would remain at the current three year requirement.

Initial assessment of business impact

The proposals will have an impact upon garage businesses that provide MOT tests. Most often these businesses offer other vehicle maintenance and repair services, although there are a very small number that solely undertake MOT work. There are currently over 22,000 MOT garages.

Vehicles registered in 2013 are likely to be the first that could be impacted by any changes. Volumes are as follows;

Vehicles type	Numbers registered in 2013
Motorcycle	86,000
Car	2,230,000
Class 4 Goods Vehicle (below 3,000kgs)	166,000
Class 7 Goods Vehicle (between 3,000kgs and 3,500kgs)	108,000

Based on the number of vehicles registered in 2013, and DVSA MOT data⁷ (over 29 million MOTs were carried out in 2013), the proposals to extend the period of the first test would likely result in an overall reduction in MOT tests as follows;

Option 2 would result in 8.3% fewer MOT tests being undertaken.

Option 3 would result in 7.5% fewer MOT tests being undertaken.

Extending the current requirement from three years to four will result in MOT garage businesses incurring a loss in MOT test fees. The maximum charge for a car MOT is £54.85 per test, however many garages offer a lower, more competitive fee and the average is estimated to be around £45.

MOT garages are required to use specialist equipment for MOTs, and fewer tests will mean a longer period of time incurred before this equipment pays for itself. Garages will need to look at options for utilising the freed up resource from doing fewer tests, and may face transitional costs associated with new work or services implemented to fill the gap. Some may also face one-off costs in having to make staff reductions.

⁷ DVSA Annual Effectiveness Report 2013/14

Motorists will benefit from the proposals, as will businesses operating in scope vehicles in the course of their occupation. There will be cost savings achieved in not having to incur the time or fees associated with taking a vehicle for the MOT. Additionally, for businesses operating fleets of vehicles there will be reduced administration in not having to deal with the paperwork and planning at year 3.

Based on 2013 new registered vehicle volumes, moving to four years for a first test will result in a consumer saving of around £109 million for option 2 and £100 million if option 3 is introduced. These savings cover both personal and business use. There is no known data available that will allow us to assess on the basis of vehicle usage.

Increasing the period for the initial test to four years will not change the requirement on motorists to maintain their vehicle to a roadworthy standard at all times, it is only where motorists fail to do this that there would be any increased impact on road safety.

Research carried out in 2011 for the Department for Transport by Transport Research Laboratory suggested that there would be an increase in killed and seriously injured (KSI) statistics if first tests moved to four years due to vehicle users failing to maintain vehicle upkeep. (The data behind these calculations is based on the high and low estimates projected in the 2011 TRL report *'Effect of Vehicle Defects in Road Accidents'*.)

Class 7 vans have a significantly higher failure rate at their first MOT of 36%, versus the car failure rate of 18%. They also have a higher average mileage at the initial MOT of around 70,000miles - which is more than double times that of a car at 32,500miles. There is no separate data available on volumes of small goods vehicles in class 4, however feedback from stakeholders has indicated that the expected failure rate for small goods vehicles in class 4 will be similar to those of the class 7 small goods vehicles.

There would be some impact upon the income of the Driver and Vehicle Standards Agency (DVSA). They receive a 'slot fee' of £2.05 for each MOT test undertaken. Consequently a reduced volume of annual tests would also reduce this income.

Option 2 – would result in a loss of income to DVSA of £5m per annum

Option 3 - would result in a loss of income to DVSA of £4.5m per annum

Prediction of risk of additional casualties and costs associated with potential changes to MOT test frequency (Based on TRL Work Adjusted to 2015 Casualty Levels and prices).

Option 2 - All Motorcycles, Cars and Small Goods Vehicles

	Low ⁸	Cost ⁹	High	Cost
Killed	1.47	£ 2,469,688	2.75	£ 4,612,698
Serious	18.86	£ 3,551,220	35.33	£ 6,651,761
Minor	137.57	£ 1,996,516	257.67	£ 3,739,357
		<i>total</i>		<i>total</i>
		£ 8,017,425		£ 15,003,816

Option 3 - Motorcycles and Cars

	Low	Cost	High	Cost
Killed	1.35	£ 2,267,839	2.53	£ 4,235,699
Serious	17.30	£ 3,257,274	32.41	£ 6,101,174
Minor	123.33	£ 1,789,784	230.99	£ 3,352,161
		<i>total</i>		<i>total</i>
		£ 7,314,897		£ 13,689,034

⁸ High/low data derived from TRL Report – Effect of Vehicle Defects in Road Accidents 2011, adjusted for subsequent reductions in the overall levels of fatal and serious road casualties

⁹ Since 1993 the valuation of both fatal and non-fatal casualties has been based on a consistent willingness to pay (WTP) approach. This approach encompasses all aspects of the valuation of lost output and the medical costs associated with casualties including the human cost, the direct economic costs of lost output and the medical costs associated with road accident injuries.

Costs are sourced from <https://www.gov.uk/government/publications/reported-road-casualties-great-britain-annual-report-2014>

Annex B - Consultation principles

The consultation is being conducted in line with the Government's key consultation principles which are listed below. Further information is available on the Better Regulation Executive website at <https://www.gov.uk/government/publications/consultation-principles-guidance>

If you have any comments about the consultation process please contact:

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Please do not send consultation responses to this address.