

# PUBLIC CONSULTATION: UPDATE OF EMISSIONS STANDARDS FOR MOT TESTING

## Consultation Summary & the Government's Response

### Introduction

The Department consulted on updates to the In-Service Exhaust Emission Standards for Road Vehicles from 24 April to 16 May 2014. The consultation also informed consultees of a plan for future editions of the publication to be produced biennially. Eight organisations were consulted, and six responses were received.

### Responses

**Autodata**, a supplier of technical information and publications to the automotive aftermarket, was concerned that the current emissions data would be out of date, or not available to some users, if the proposal to update the publication biennially went ahead. They asked if the Department had plans to continue to make the data available to interested parties. They appreciated the constraints that publishing data in this way places on the Department but considered it important that accurate data should be available to parties involved in motor vehicle service and repair.

**DfT response:** The risk that the data might be out of date, and that this might impact negatively upon the operation of the annual test has been considered, but we are unaware of any issues resulting from the previous delayed publication of the emissions data which has, in effect, already trialled a biennial update cycle. In moving to a biennial publication, the Department plans to request data from manufacturers on the same cycle, so that, except where a manufacturer identifies a problem and notifies the Department, there will be no unpublished data to share with interested parties.

The **Garage Equipment Association** and **Continental Automotive Trading UK** supported the publication of the 18<sup>th</sup> edition of the booklet. However, they believed that updating vehicle emissions data annually helps to remove errors from the database long before a vehicle is submitted for MoT and that changing the frequency would reduce the quality of the data.

They believe errors within the data would not be picked up until the vehicle was presented for MoT and would not be put right until the 4<sup>th</sup> year. This might cause some vehicles to fail the MoT test. They suggest it takes about two months for all testing stations to have their machines updated, so that moving to a two year update might not provide an adequate buffer. Taxis undergo MoT annually, so that those using Stratified Combustion, producing high lambda readings, would fail the MoT test. They argued, in addition, that their members would have less time to deliver the updated data to the Testing Station's Exhaust Gas Analyser (EGA), which is the only automatic result-against-limits check conducted during an MoT. Since the Testing Station's computer will not automatically check the test results against the specified limits, the automatic pass or fail of a vehicle by an EGA using the previous edition of the data would, they argued, make the MoT test unlawful. They asked that, if the

frequency reduction were to go ahead, that DVSA should force vehicle test stations to update the database within the test equipment promptly.

**DfT response:** Although the arguments outlined by these respondents are sound, and have been considered, we have not seen any evidence of problems appearing in practice as a result of a longer publication timescale. There was a twenty-two month gap prior to the publication of the current booklet in June 2012. We think that the risk of a test being undertaken using a superseded version of the data will be no higher with a biennial update cycle than it is now.

**Transport for London (TfL)** supported the revisions to the Emissions publication to incorporate data for new models and to correct a small number of erroneous entries. It noted that there were no increased costs to motorists or the motor industry as a result of these changes. It also noted that the new edition was proposed to be made available only electronically. TfL supported a move to biennial publication of updates, which should reduce costs, but emphasised that care should be taken to avoid errors and omissions being perpetuated within the current booklet for longer than necessary.

A member of the public who accessed the consultation through the Department's website also indicated support for the revisions to the Emissions publication.

### **Conclusions**

No objections were raised to the proposed updates to the In-Service Exhaust Emission Standards for Road Vehicles. However, there were objections to the proposal to produce the publication biennially. The objections raised, whilst potentially sound in some cases are not supported by the evidence from the delay prior to publication of the current version of the booklet. They do not seem to us to outweigh the benefits of reduced cost envisaged from moving to biennial publication. The regulations required to give effect to the updated emissions will therefore now be laid before Parliament.