Department for Transport

Date of the first MOT test

Consultation Response

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Foreword

This document covers analysis of the responses to part 1 (the consultation), with a response to part 2 (the call for evidence) included in the statement published alongside this document.

We received nearly 4,500 responses to the consultation and call for evidence about reforms to MOT testing. Decisions about changes to the date of the first test for cars, vans and motorcycles (currently 3 years, with consideration of moving to 4 or 5 years proposed) will not be made in isolation from the information received about other developments of the MOT test. The responses to the consultation on the first test date include a number of concerns.

The government does not intend to proceed in changing the date to a vehicle's first MOT.

The Driver and Vehicle Standards Agency (DVSA) has undertaken a trial of particulate number testing for diesel vehicles and we will consider these results before deciding whether to proceed.

Background

The Department for Transport (DfT) carried out this consultation for 2 reasons. The first was to gather views on proposals for changes to MOT testing in the short term, mainly to the date at which a first MOT test is required. In relation to these possible short-term changes, the consultation sought views and evidence about:

- whether to change the date at which a first MOT should be required for cars, vans and motorcycles (see list of vehicles in scope of the consultation)
- means of mitigating the effects of changing the date of the first MOT test
- the practical issues involved in introducing particle number testing for diesel vehicles

The second reason for the consultation and call for evidence was to seek evidence on the longer-term future of MOT testing, including:

- how often vehicles should have an MOT test
- the content of MOT tests
- costs and fees
- the service that motorists receive from MOT testing stations
- longer-term changes needed in light of technological development

The consultation sought views from those who carry out MOT testing and those whose vehicles are tested.

The consultation period ran from 18 January 2023 to 22 March 2023. A total of 4,489 responses were received, 4,406 via an online survey and 84 by email or post.

Table 1: Respondents

	Breakdown of respondents	Response Percent	Response Total
1	Individuals	76.16%	3419
2	On behalf of an organisation	23.84%	1070
		Total	4489

Alongside the consultation document, DfT published an impact assessment on the proposal to change the date of the first MOT.

This paper summarises the response to part 1 of the consultation. A response to the call for evidence in part 2 is included in the statement published at the end of this paper.

Conclusions

Date of the first MOT test

There has been significant evidence put forward for keeping the first MOT test at 3 years. Although there have been improvements to the safety of vehicles through automated systems, for example, the initial analysis indicating only a small forecast increase in poorly maintained vehicles appears to be reasonable. There remains, however, a need for regular physical checks on safety critical components.

With continuing advances in the feedback delivered to drivers, as well as methods of testing, it may well be possible to adapt regular testing in future to reduce the requirements for MOT testing safely. DfT will review further the evidence alongside the review of wider MOT reforms and prepare an updated impact assessment.

The issue of safety was raised by a large number of respondents, both from MOT testers and non-MOT testers such as motorists and other businesses, with particular attention given to the condition of safety-critical components such as tyres and brakes, which are essential to a vehicle's ability to navigate safely. Due to these components being inherently friction-dependent, they experience wear throughout their use, and can wear below their safe limits without the knowledge of the vehicle owner if a sufficiently early inspection is not carried out. Although the legal obligation to maintain a vehicle in a roadworthy condition is that of the vehicle owner, there continues to be statistically significant failure rates in 3-year-old vehicles.

	Failure rates			**Car fleet split (2021)**	
Fuel type	All vehicles	Vehicles registered 2015-21 (newer vehicles)	Vehicles registered 2018 (age 3)	percentage	Count
Petrol	5.70%	4.26%	3.64%	58%	19,085,249
Diesel	6.85%	5.70%	5.14%	37%	12,146,485
EV	6.11%	6.21%	5.53%	1%	389,005

Source: DVSA MOT data for 2021, and vehicle licencing statistics produced by DfT

Electric vehicles (EVs), which are becoming increasingly common on our roads, though being more sustainable, are typically heavier than their internal combustion engine (ICE) counterparts, due to the battery. Given the well-established link between vehicle mass and the rate of wear of components such as tyres, and the initial MOT test failure data for EVs,

many respondents felt it would be in the interests of EV drivers and other road users to maintain the first MOT test at 3 years – both for safety and insurance purposes.

This idea was expressed by one respondent:

DVSA MOT test data clearly demonstrates that the far higher proportion of tyre failure among electric vehicles (EV) and hybrid vehicles requires very careful and particular consideration by DfT, as the vehicle parc transitions to these technologies in line with government decarbonisation ambitions.

A respondent also highlighted that these issues may become greater as EVs have heavier batteries to extend their range, potentially raising serious traffic collision incidents as they could:

… do damage to a more vulnerable road user than lighter vehicular counterparts bringing a lack of confidence to the historic data of ICE vehicles and their relationship to casualty rates being used to forecast damage by a different type of vehicle.

These doubts about incident rates in the future extend to all vehicle classes. A number of respondents outlined that, anecdotally, motorists often get their vehicle serviced before an MOT test, meaning that defects are identified prior to the point when they would become a part of the data used to identify failure rates.

This suggests that the number of vehicles being driven with dangerous defects is likely higher than MOT failure rates suggest, which is something that is particularly relevant if the vehicle has not been tested in 4 years.

One respondent expressed as much:

In reality, many owners may only undertake vehicle inspection or safety pre-screening in order to help ensure they pass an MOT.

The position was also put forward in the consultation that the economic benefits are not robust enough to justify any decrease in road safety when the change would only save (those who could afford a new vehicle) the price of a single MOT test throughout the entirety of the vehicle's ownership.

It was argued by a number of respondents that the costs of defects getting worse and vehicles needing more extensive repair at a later date, when previously they would be identified at 3 years, would decrease the financial benefits.

One respondent said:

With the DVSA maximum price set at a shade under £55 per test, the price of an MOT amounts to little over 1% of the annual motoring costs of the average household…

To put the test fee into perspective, at the current level of £54.85, it roughly equates to two-thirds of the cost of a single 55-litre tank of fuel (£81 for petrol and £92 for diesel), or only 24% to 29% more than just the VAT and duty elements on that tank of fuel alone…

When considering the savings that might accrue to households from avoiding the Year 3 MOT, we note that the saving would only apply for one year in any vehicle's lifetime.

As is noted in the consultation document, it is currently possible to find a garage where tests are available for substantially less than the maximum fee. In many instances, it is likely that the real budgetary issue for owners is not the current cost of the MOT itself but the cost of getting defects rectified.

Not all respondents were opposed to the change from 3 to 4 years. Firstly, it should be noted that most responses were provided by individuals working in or around the motor industry. This is intrinsically valuable in that we benefit from their experience and expertise while consulting. However, it can inevitably bring a degree of vested interest into replies.

Those who replied in support of the proposal often expressed a belief that they were able to maintain their own vehicles and were not dependent on an MOT to identify issues.

There was some scepticism about the role of garages in the process given that many people would get any issues identified in an MOT fixed at the same garage, incentivising testers to exaggerate problems. There was, however, little to no evidence to show this happens in practice.

A number of replies supported the basic principle of the proposal, that improved technology had reduced the need for the MOT. Even some respondents who objected to the change overall acknowledged that this was predominantly due to concerns with EVs and vans. In its submission, one respondent provided the results of a survey of its members that showed a solid majority supported the change. All of which suggests that the case for the change does have a reasonable basis.

The early data on EVs and vans indicate the proposed change is not sensible. And while our understanding will improve over the years, it does appear that the MOT will add value at this point by identifying any potential issues with safety-critical components such as tyres.

Another unknown is the link between the MOT and the end of lease arrangements (and inclusive service arrangements) and whether a change to the MOT start date would break this link.

An issue was raised with leased and rental vehicles active in Northern Ireland that are registered in Great Britain needing to travel to Great Britain for an MOT. Most lease and rental vehicles are sold into the second-hand market before 3 years. Communication with the Driver and Vehicle Licensing Agency (DVLA) in Great Britain has clarified that the affected vehicles can be straightforwardly re-registered in Northern Ireland to an address where the business can be contacted. This does not require such vehicles to be taken off the road while this process takes place, and they will then be subject to a first test at 4 years. We consider this the appropriate solution if these vehicles are based predominantly in Northern Ireland.

Particle number testing

We recommend proceeding with trials to determine if and how particle number (PN) testing can be implemented. This measure was viewed positively by the majority of respondents, 41% to 22%, with 37% neutral.

Respondents emphasised the need to improve air quality levels in urban areas and agreed that PN testing was a positive step in doing so. The existing test is seen as being inadequate to identify diesel particulate filters (DPFs) that have been removed or damaged, leading to a greater number of harmful particulates being released into the environment.

Those who opposed the changes tended not to dispute the idea that PN testing is more reliable for detecting faulty or removed filters. The arguments against testing included:

- the cost to garages
- diesel owners being punished for having a vehicle that was previously seen as environmentally friendly
- the extent of the impact given the imminent phasing out of combustion engine cars

These arguments are worth considering as trials progress, however, a full impact assessment will need to be undertaken to determine the value of the policy. The costs to garages is estimated to be around £5,000 for testing machines, with costs and funding options considered within the review. We also feel that although some diesel drivers feel this measure would be unfair, enforcing existing standards more effectively could bring health benefits.

Overall responses to the change in date of the first MOT test

This section provides an overview of the replies received to part 1 of the consultation and extracts from a selection of anonymised stakeholders. Given the volume of replies received, it is not comprehensive, but we have viewed all those submitted.

Most of the respondents were from the MOT testing sector. In total, 60% replied either on behalf of organisations that carry out MOT tests or were individuals who work in the MOT sector.

The majority of responses received were opposed to changing the date of the first MOT test (see table 2).

The arguments put forward in favour of each option were similar regardless of whether the views were expressed by individuals or on behalf of organisations and between motorists and non-motorists. MOT testers were particularly strong in opposing the change (96%), compared to (65%) of others.

Table 2: views on change of the date of the first MOT

	In your view, should the date of the first MOT:	Response Percent	Response Total
1	remain at 3 years?	83.58%	3735
2	move from 3 to 4 years?	9.00%	402
3	move from 3 to 5 years?	6.74%	301

Arguments in favour of keeping the first MOT at 3 years from industry and safety groups.

A large majority of respondents favoured keeping the date of the first MOT at 3 years. The most common reason given was concern about the effects on road safety if the date of the first MOT was changed.

One organisation argued that the case for change had not been made with enough evidence. It provided a comparison of breakdown data between Great Britain and Northern Ireland (where a vehicle's first MOT test is carried out at 4 years). The greatest difference was that breakdown data they shared indicated that in Northern Ireland, over the past 4 years, the occurrence of punctures where drivers were not carrying a spare wheel accounted for around twice the percentage of all call-outs compared to Great Britain. This data has not been verified.

Ultimately, the organisation would only support a change in the date of the first MOT if any vehicle that had done 60,000 miles prior to its 4th year was required to have an MOT to identify issues such as tyre wear from excessive use.

One safety organisation attributed improvement in road safety, in part, to the current MOT testing regime itself.

Other respondents echoed the view that road safety improvements were evidence in support of the current system and a change in the current system risks derailing continued improvements in road safety.

Another organisation opposed the change in principle but, in a member survey, more respondents (46%) supported a change from 3 to 4 years while 27% were opposed. They stated that, given the extent of support from drivers, they would not oppose such a change were it to be introduced.

A retailer representative stated that:

…new vehicles drive more miles than older ones. As MOT failure rates increase with miles driven, the first 3 years of a vehicle's life can be the most important in terms of safety.

A road safety charity claimed that of the people who were killed or seriously injured in a collision in which a vehicle defect was deemed to be a contributory factor in 2021, tyres that were illegal, defective or under-inflated were a contributory factor in about a quarter, and defective brakes, steering or suspension, in more than half.

They argued that delaying the date of the first MOT test would lead to more vehicles on the road with such faults.

One respondent pointed out that the UK has a better road safety record than many other European countries that have a first roadworthiness test at 4 years.

An insurance industry representative opposed the change but – like others – said that, if introduced, the change should include a mileage threshold (its suggestion was 50,000 miles).

Some respondents argued that it is too early to make the change at this point in the transition to electric vehicles.

Data so far suggests that EVs fail MOTs more often than petrol vehicles (especially on tyres). One organisation has analysed publicly available data from Driver and Vehicle Standards Agency (DVSA) to show that EVs have higher rates of tyre failure at their first

test after three years. This is likely because EVs are heavier and have higher torque, although driver behaviour may also be a factor.

A respondent stated that the change would lead to more than 2.5 million unroadworthy cars and over 121,000 unroadworthy light commercial vehicles being on our roads for a further 12 months. Furthermore, about 4.5% of these failures were due to dangerous defects with tyres.

A respondent highlighted the expected aging of the average car, increasing from 7.9 years in 2019 to 9.7 years by 2026. The retailer expected the overall failure rate to increase over time. They suggested moving to a 4-year first MOT would exacerbate this issue, with an overall failure rate up to 1.4% higher than in the current 3-year system, which equates to about 440,000 vehicles in an unsafe condition on the roads in the near future.

A retailer did not believe that the negative impact of delaying the date of the first MOT by a year could be mitigated by measures such as introducing additional safety information campaigns for drivers. However, these types of measures should still be considered to boost road safety outside of considerations of changes to the first date for MOT testing.

Tyre manufacturers argued that significant MOT test failure rates for tyres are observed at the first test. Tyres are, by a large margin, the leading cause of MOT test failure for light vehicles aged between 3 and 5 years.

They, among others, argued that any financial benefit would be enjoyed by better-off motorists while those running an older vehicle are likely to see no savings but rather an increase in the cost of motor insurance.

A significant number of respondents from the MOT sector questioned the competence and/or diligence of members of the public to identify faults, such as bald tyres, and then have them repaired.

Respondents from industry overwhelmingly indicated that motorists do not take their vehicles for regular and necessary servicing even when they know they have a defect, and that they only do so when it is legally required, for example, when taking their vehicle for MOT. They noted that there was potential for misunderstanding with motorists interpreting the change in the date of the first MOT as a licence to not service their vehicle.

Some respondents made the point that this situation is exacerbated by the cost-of-living, creating cost pressures that disincentivise motorists from taking vehicles for servicing. Some respondents felt that an increasing number of people are buying cars on finance and can’t afford to service their vehicles sufficiently frequently. In addition, fleet operators were cited as carrying out the bare minimum of servicing on their vehicles to maintain profit margins.

Some respondents argued that delaying the date of the first MOT will lead to greater costs for motorists due to larger service repair bills as faults remain undetected for longer and become more severe.

Over a third (37%) of respondents said they either had their car serviced with an MOT or at another time (see table 4). About 3% of respondents said that they do not get their

vehicles serviced. Nearly two-thirds (65%) said that they would continue to get vehicles serviced even if not prompted by an MOT.

A servicing company questioned the assumption in the impact assessment that 17% of vehicles in scope are owned by businesses. In 2021, 55% of new vehicle registrations were to company keepers. Typically, vehicles would move from a company keeper to the private market after 3 years. However, with new vehicle availability reduced, more are staying in the fleet car park for longer and therefore moving into private ownership later.

One respondent highlighted the potential effect on emissions. If the first MOT test was delayed to 4 or even 5 years, information about emissions near limits would not be communicated to the vehicle owner and the opportunity to have remedial work completed would be delayed for potentially 12 to 24 months.

The missed opportunity to correct emissions would likely be more damaging to the environment and public health than a short journey to have a vehicle undergo an MOT at 3 years old. This could also cost motorists, as the local authority can check that emissions from road vehicles comply with Construction and Use Regulations and issue fixed penalty notices to those failing the test.

Arguments for keeping the 3-year first MOT test from non-industry respondents

More than half the respondents were from within the garage sector and, therefore, likely to be more aware of the importance of regular servicing than motorists as a whole. We have, therefore, considered the responses from individuals who indicated that they did not work for a company that carries out MOT testing. However, even the responses from individuals who do not work for MOT testers mostly stated that they serviced their vehicles regularly.

Some respondents identified factors that were, in their view, increasing safety risks, such as the fact that many newer vehicles are heavier. Some concerns were raised that traffic calming measures and poor road quality could lead to greater numbers of defects.

Several respondents made the point that, although vehicle technology had in general improved, there had been little improvement in the durability of safety-critical components such as tyres, brake pads and suspension components (ball joints and springs). Faulty or degraded tyres and brakes were the most common factor in defect-related road traffic collisions and accidents.

It was claimed that reduced MOT frequency will lead to a greater risk of accidents and higher insurance costs for motorists, which will negate savings made by the motorist.

Rather than extending the date at which a first MOT is required, some respondents argued that the date of the first test should be earlier than 3 years for some or all vehicles. For instance, a manufacturer supplying components for brakes, suggested that the first test for vans should be after 1 year (or by mileage). Another respondent recommended that we should consider a first test at 1 year for all business vehicles, cars and light commercial vehicles.

Some respondents suggested potentially basing testing on mileage rather than a fixed time for all vehicles, particularly as corrosion is not as large an issue for newer vehicles.

There was also concern expressed about the effect that changing the date of the first MOT would have on the business revenue of MOT testers.

The fact that people service their vehicles in anticipation of an MOT test gives the false impression that a higher number of vehicles have been roadworthy the entire time leading up to that test.

Warranties ensure regular servicing, and given most warranties are 3 years long, motorists could be less likely to service their vehicles after this period, leading to failure at MOT.

An issue raised is that the MOT is needed because the police do not have sufficient capacity to police unroadworthy vehicles.

Arguments in favour of changing the date of the first MOT from 3 to 4 years

Some respondents agreed that the proposed measure would save motorists money.

Respondents argued that vehicle manufacturing is more advanced than it used to be. Supporting points included that vehicles are less prone to rust than in the past and they have better suspensions and additional safety features. Electric vehicles have fewer parts and, therefore, fewer components that can break. Computer feedback and vehicle self-diagnostic systems make vehicles safer.

One respondent stated that, in most cases, legislation requires enhanced onboard vehicle self-test systems for testing braking, engine and emission systems before engine start. Some fault modes instigate a fail-safe mode to force the operator to seek repair even if the warning lights and messages are ignored. The extension of vehicle warranties also points to improved manufacturing standards giving longer vehicle life and reliability.

Some respondents highlighted the main issues tend to be tyre wear. They said that wear on components such as tyres and brakes should be obvious to the driver and that drivers should be responsible for the roadworthiness of their vehicles.

Other respondents argued that the only things that need to be checked earlier than 4 years are tyres and brake pads.

The failure rate after 3 years (at 4 years) continues to be relatively low. A case for change was made in the case of there not being a significant discrepancy between failures for MOTs after 3 and 4 years.

There are more company and lease vehicles on our roads, which are better looked after as they have a service plan during their warranty period. A warranty ensures regular servicing and many cars come with a service contract that requires manufacturer servicing.

New cars are more likely to be well-maintained than older vehicles. The majority of vehicles are now covered by a 3-year warranty, so any defects are dealt with by the warranty process. Another respondent stated that most cars have a 5-year warranty.

Some respondents who supported this option nonetheless argued that high-mileage vehicles should get tested sooner than ones with lower mileage. On the other hand, it was stated that people are driving less due to global fuel cost impacts and, therefore, have decreased their mileage.

One respondent agreed that MOTs for cars could start at 4 years but believed that vans, especially class 7, should remain at 3 years due to the high use of these vehicles.

Arguments in favour of changing the date of the first MOT from 3 to 5 years

Fewer respondents supported the change from 3 to 5 years compared to 3 to 4 years. However, the arguments made in favour of both options were similar.

In particular, respondents argued that:

- modern vehicles are better built than those in the past;
- warning lamps for defects make drivers aware that their vehicle needs servicing;
- it is the responsibility of the driver to have their vehicle serviced and ensure that it is roadworthy;
- modern cars are typically sold with service guarantees;
- vehicles are now doing fewer miles and, therefore, experiencing less wear. However, higher mileage vehicles should have an earlier test.

Other comments

One association reported different views among members with some feeling that, with limited remote access to prognostic vehicle data, a 4-year MOT is a step too far. Other members, mainly those who have a more proactive vehicle inspection regime of their own, would welcome a shift to 4 years and the cost savings this would bring.

Leasing and rental companies need to be able to access in-vehicle data. They argue that "*the introduction of new technology has made drivers more complacent and less confident in conducting safety checks or responding to warning lights*". One member said that more vehicles were failing their first MOT due to damaged tyres. Drivers are particularly poor at identifying non-tread depth-related tyre failure points.

The trend away from active maintenance is supported by data from the organisation's quarterly survey, which found a decline in businesses taking maintenance contracts over the past 3 to 4 years. Only 52% of new additions to the fleet have maintenance included in their contract.

They suggest addressing safety concerns either by:

- retaining the MOT at 3 years for most drivers but shifting it to 4 years for rental fleets audited by a third party.

OR

- shifting the MOT to 4 years for all, but ensuring vehicle owners and fleet managers have access to the in-vehicle data needed to keep drivers safe.

Another respondent mentioned concerns about the quality of parts now being lower due to manufacturers being perceived to be cutting costs.

A number of responses suggested that the MOT system should be based on the mileage of a vehicle rather than its age. The variety in the amount that people drive within 3 or 4 years is wide and, therefore, delaying the date of the first MOT to 4 years is risky.

Rather than putting back the date of the first MOT, several respondents called for the date of the first MOT to be brought forward to the first or second year.

One reason for this was the claim that electrical systems for brakes and steering, which are more common than in previous years, are more likely to fail compared to mechanical components. It was suggested that tyres and brakes are extremely likely to, and very often do, wear before even 3 years without the motorist being aware. This proposal was made particularly for vans by one organisation and is supported by DVSA roadside data.

One suggestion was for a progressive annual testing cost for new vehicles, rising each year.

It was also noted that the cost of an MOT is relatively low in the context of the costs associated with leasing or owning a vehicle.

It was further stated that the cost of an information campaign would be better spent elsewhere and while MOT garages issue advisory notices, people often do not act on them.

Responses from motorists

Most individuals responding had vehicles requiring an MOT. A significant number had more than one type of vehicle (such as a car and a motorbike).

Table 3: respondents with vehicles requiring MOTs

Do you currently have a vehicle or vehicles that require MOT testing?			Response Percent	Response Total
1	Yes		93.90%	1607
2	No		6.10%	98

How individuals approach vehicle servicing and repair

To understand better the effects of changing the date of the MOT, we asked about how people get their vehicles serviced currently and whether that might change if they were not prompted by an MOT.

Table 4: servicing of vehicles

Generally what are the timings of how you seek your vehicle's annual servicing and MOT? Answer Choices			Response Percent	Response Total
1	My vehicle or vehicles get serviced and have their MOT completed together		36.74%	590
2	My vehicle or vehicles get serviced and have their MOT completed at different times		49.13%	789
3	I don't usually get my vehicle or vehicles serviced		3.05%	49
4	I don't have a fixed approach		10.83%	174

Table 5: role of MOT in prompting servicing

How likely are you be to continue to undertake servicing of your vehicle or vehicles annually despite not being prompted to by an MOT notification?			Response Percent	Response Total
1	Very likely		65.15%	1047
2	Likely		14.06%	226
3	Uncertain		8.03%	129
4	Unlikely		7.53%	121
5	Very unlikely		4.73%	76

We asked respondents if they believed that their vehicle had a fault (either through a warning light or their own knowledge) before its MOT due date, how likely it was that they would seek a repair.

Table 6: repairs

In this scenario how likely would you seek a repair of your vehicle?			Response Percent	Response Total
1	Very likely		71.43%	1140
2	Likely		14.97%	239
3	Unsure		4.70%	75
4	Unlikely		4.70%	75
5	Very unlikely		3.76%	60

Responses on behalf of organisations

The consultation included questions that sought to understand the extent to which garages that carry out MOTs rely on MOT business and the impact of changes on such businesses.

Those responding were asked what percentage of their employees are exclusively MOT testers. There may have been some misunderstanding of this question.

The number of companies that reported fewer than 10% employees working on MOTs was greater than expected. We suspect that some companies may have reported the actual number of MOT testers rather than the percentage of their workforce that carries out testing.

Table 7: Breakdown of organisations responding by number of employees

What is the size of your organisation?			Response Percent	Response Total
1	1 to 9 people		72.47%	779
2	10 to 49 people		12.65%	136
3	50 to 250 people		4.47%	48
4	Above 250 people:		5.30%	57
			Total	1075

Table 8: companies carrying out MOT testing

Does your company carry out MOT testing?			Response Percent	Response Total
1	Yes		90.33%	971
2	No		9.67%	104
			Total	1075

Table 9: Reliance on MOT testing

To what extent does your business rely on MOTs for custom?			Response Percent	Response Total
1	Completely reliant		14.67%	389

2	Somewhat reliant		19.20%	509
3	Not reliant		1.62%	43

Table 10: staff dedicated to MOT testing

Do you have staff purely dedicated to MOT testing?			Response Percent	Response Total
1	Yes		25,87%	686
2	No		9.65%	256

Table 11: effects on staffing of MOT garages

To what extent do you think it is fair to assume that any fall in the number of MOTs will free up garage staff, allowing them to complete other tasks instead			Response Percent	Response Total
1	Completely fair		1.06%	28
2	Fair		1.55%	41
3	Neither fair or unfair		5.22%	138
4	Unfair		7.75%	205
5	Completely unfair		19.47%	515

Fleet vehicles

There were 25 respondents that reported that their organisations required fleet vehicles. The consultation included questions on the effects of the proposed change on their business.

Most responses to these questions focused on the same issues as the responses to the general question on changing the date of the first MOT – that the reduction in MOT tests would adversely affect their business and road safety in general.

For the relatively few respondents who appeared to work for companies that operate fleets of vehicles, the impact of a change in date depended on their business model. For instance, a couple of respondents stated that they deployed older vehicles so a change from 3 to 4 years would have no impact. Similarly, a couple of respondents stated that they leased vehicles and returned them before the first MOT was due so the change would not affect them.

There were 2 responses that noted the benefits of delaying the first test in terms of reduced downtime while vehicles were being taken for MOTs. One respondent based in Northern Ireland referred to advantages of alignment across the UK.

Some MOT testers responded to this question by pointing out that fleet managers need to keep costs down and that this would provide the opportunity for further cost savings by cutting corners on safety.

In terms of effects on MOT testing companies, a number of firms emphasised the seriousness of the effect on their businesses.

One of the strongest supporters of the change stated it would reduce the number of vehicles unavailable for rental as they await an MOT. They completed over 30,000 MOTs across their fleet in 2022 including cars and vans mostly for 3-year-old vehicles. (The global shortage of new vehicles has meant holding on to vehicles for longer, meaning that more vehicles are 3 years old and requiring a first MOT.) Although these vehicles still require servicing.

Where vehicles were off the road to complete MOTs, 100,000 potential days of rental were lost, reducing revenue by around £5.5 million. This does not include the cost of the MOTs, nor the operational costs of arranging test dates and the delivery of vehicles.

They also stated that the difference between GB and Northern Ireland presents operational challenges where vehicles are rented in Northern Ireland but operated in other parts of the UK. Vehicles that are 3 years old from Northern Ireland require an MOT in other parts of the UK, but the MOT cannot be completed in Northern Ireland. This necessitates shipping vehicles from Northern Ireland to have MOTs completed in other parts of the UK and then returning the same vehicles to Northern Ireland.

As stated above, communication with the Driver and Vehicle Licensing Agency (DVLA) in Great Britain has clarified that the affected vehicles can be straightforwardly re-registered in Northern Ireland to an address where the business can be contacted. This does not require such vehicles to be taken off the road while this process takes place, and they will then be subject to a first test at 4 years. We consider this the appropriate solution if these vehicles are based predominantly in Northern Ireland.

One respondent also highlighted a shortage of repair and maintenance slots for vehicles within the UK repair sector. Changing the MOT date could free up capacity for more serious maintenance work.

A respondent opposed the change from 3 to 4 years. They stated that:

MOTs are included in the fixed maintenance cost for fleet cars, yet we still show a 30% fail rate which rebuffs the theory that drivers respond to warning lights.

If fleet drivers, who do not bear the cost for maintenance and repair, are not getting in-life repairs done, then outside-of-fleet, where there is likely to be a bigger cost impact consideration for the driver, it is likely that more people do not get vehicles repairs unless prompted by the MOT.

They note that electric vehicles do not require regular or structured servicing, so the first touchpoint could be the MOT. This is not yet evident because of the low numbers of EVs presently. Like others, they point to additional impact on suspension, brakes and tyre wear because EVs are heavier.

Van fleets are often high mileage and more likely to need checks and repairs on key items. Any data will not accurately represent van fleets whereby the operator treats its high-mileage vans as commercial vehicles and has regular inspections and pre-inspection checks to avoid MOT failures.

They support changes to provide access to vehicle data because the MOT failure rate shows drivers cannot be relied upon to act on warning lights even though this is clearly mandated in policy. This will help managers run their fleets and maintenance services and reduce costs and downtime for fleet operators and drivers.

Table 12: Mitigating any effects of changing the date of the first MOT

Should any of the following changes be introduced alongside changing the date of the first MOT to reduce the effects on road safety or polluting emissions?				
Answer Choices			Response Percent	Response Total
1	Additional safety information campaigns for drivers		6.42%	287
2	Additional odometer checks		4.05%	181
3	DfT publicity to ensure that motorists keep their vehicles safe ahead of the date of first MOT test		6.33%	283
4	Ensure vehicle service packages include items that are also covered in the MOT		8.21%	367

Particle number (PN) testing

DfT proposed introducing particle number (PN) testing for a more robust emissions assessment of modern diesel vehicles. The diesel vehicles affected will be those made with post-2013 diesel engines. Survey respondents were asked whether they believed that introducing PN testing was the right approach. Of those who expressed a view, most were in favour of introducing PN testing.

Table 13: Approach to PN Testing

Do you believe that the PN approach (introducing PN testing is correct or incorrect?			Response Percent	Response Total
1	Correct		40.60%	1813
2	Incorrect		21.83%	955
3	Don't know		30.39%	1357

Arguments in favour of introducing PN testing

By far the most common reason expressed in support of introducing PN testing was that it would be effective in tackling air pollution. The current smoke opacity tests are not seen as effective in measuring particulates. Vehicles can pass smoke opacity tests with diesel particulate filters (DPFs) removed. Well-maintained vehicles should easily pass the PN test.

Some respondents said that they were seeing many vehicles that had had DPFs removed to reduce maintenance costs.

The introduction of PN testing would stop the removal of DPFs. Another respondent suggested that the measure would reduce aftermarket fraud where companies provided the shell of a DPF so that it looked like one was present.

Some said that drivers – after failing the MOT on emissions – kept trying MOT testers until they found one that would pass their vehicle.

Another respondent said that while he supported the change, we needed to bear in mind the forthcoming phase-out of diesel vehicles and whether the change represented value for money. Another also noted that diesel registrations are declining quickly (in the car market), but they supported PN testing for heavy goods vehicles (HGVs) and an additional class for light vans that fit into the current class 4.

One respondent supported the change. They said that if a diesel vehicle is primarily used for low-speed, short urban journeys, the engine is too cold to ‘burn off’ the build-up of soot in the DPF. In most cases, a dashboard warning light will indicate when a DPF needs cleaning. Aside from the risk of a faulty DPF causing further expensive damage to a vehicle, threat of MOT failure should encourage drivers to look after their DPFs. A small number of drivers remove the DPFs from their vehicles – something that is not generally picked up in a visual MOT check (often because only the innards are removed).

Arguments against introducing PN testing

The major reasons given for opposing the change related to costs either to the motorist or to garages.

Several respondents were concerned that the test would reveal issues that would be expensive for motorists to have repaired and this might lead to cars being scrapped. There was a suspicion that this was the government's intention – to take cars off the road. One respondent highlighted the carbon emissions involved in repairing or manufacturing new parts.

One claimed that it was moving the goalposts after cars are manufactured since cars are made to emissions standards, seeing this as an unnecessary burden and that the measure should only apply to new cars. Another argument was that the measure was not needed because modern cars warn drivers of faults.

However, another respondent noted testing had shown that some manufacturer's vehicles perform less well than others in real-world testing. Many early adopters of EU6 emissions regulations fell well short of the EU6 emissions requirements, when in "real-world" use. Introducing testing in the MOT could unfairly penalise owners of such vehicles that are not Low Emission Zones (LEZ) exempt.

There were some defenders of the current test who argued that it was satisfactory.

A number of respondents argued that it was unfair to make garages invest in new technology, some linked this with a potential reduction in the amount of testing. That would reduce garages income at a time when we were asking them to do more with PN testing.

Some respondents questioned the need for the measure given that the production of internal combustion engines is ceasing after 2035. One person argued that – given the forthcoming phase-out of diesel vehicles – the test was too complex and suggested as an alternative a filter paper test as simple to perform, cheap and adequate. Another suggestion was an interrogation of the vehicle on-board diagnostics (OBD) system. If feasible and subject to the OBD system being immune from tampering, this might be a lower-cost option that achieves the same outcome as PN testing.

Proposals to implement PN testing

The most common response was that the proposal should be phased in. Some pointed out that this had been the case with previous changes to MOT testing. One respondent added that phasing would be needed both for garages to purchase the equipment and install it and for the manufacturers/aftermarket retailers to stock up on these machines.

A large number of respondents expressed concern that the change would require significant investment by garages. Many of the suggestions for implementation related to ways of mitigating the costs to garages of introducing the new test. One said that if the equipment is expensive, it would need to be subsidised or many stations would stop testing diesel vehicles.

A number of people made the link with the MOT fee, pointing out that the fee had not changed for a long time and/or that it would need to increase. One suggestion was to end the ability to discount MOT fees and opt for a fixed fee.

One respondent said that the fee hasn't changed at all in many years, yet the financial load on stations has increased massively due to extra calibrations, cost of living (wages), electricity charges, and local discounting of the test fee (which they felt needs to be stopped).

To finance investment in the necessary equipment, one suggestion was to increase the maximum price of the test so garages can afford to invest. Another was that government should provide the equipment or grants towards the cost of equipment. The price for an MOT could be increased for older, high-mileage cars to help garages fund changes.

There were various proposals for timing, including that PN testing might only be compulsory for larger firms in the first instance. One suggestion was that from 1 January 2026, all garages will be required to have the equipment or not be able to test diesel vehicles from a certain year. Another respondent proposed that such a change should only come into effect 1 year after the law was implemented and applied only to new cars. A further respondent proposed a change should only come into effect 2 years after the law was implemented. Others suggested that by a specified date, such as 2026, if a garage does not invest in the new equipment, they should only be allowed to test vehicles over 10 years old. Another proposal was for a 4-year phase-in for existing garages but that new MOT garages that open following any announcement or legislation should be required to carry out PN testing. It was also suggested that, if introduced, PN testing should only apply to new garages or those replacing equipment.

One respondent said that a long lead-in to ensure test equipment would be needed for each garage was sensible. Perhaps introduce first in areas with known air quality issues or DPF removal.

One respondent suggested that testing and production cycles would mean PN testing could not be fully implemented for at least 24 months when legislation is passed. This would allow 6 months to get equipment developed and approved for the UK market followed by at least 18 to 24 months to supply the marketplace. At 18 months this would require around 1,300 units being put into the MOT market monthly by manufacturers, or at 24 months this would be just under 1,000 units per month.

Government Response

The Department for Transport thanks the nearly 4,500 respondents who have responded to the consultation and call for evidence about reforms to MOT testing. Road safety concerns are a priority for the government and the MOT test not only helps address these, but also identifies safety-critical issues. The Government intends to maintain our exceptional record on road safety - with it being one of the best in Europe.

The Department sought views about amending the date of the first MOT for cars, vans and motorcycles from three to four years. Overall, 84% opposed changing the date of the first test. A high volume of concerns were raised in relation to road safety, in particular regarding tyre and brake wear - the most common reasons for first-time MOT test failures. These safety issues are particularly important given the volume of anecdotal evidence that suggests that many drivers rely on the first MOT test to identify safety-critical issues.

We have also considered the cost to motorists. We agree with a number of respondents who identified that any savings made by motorists would at best be extremely marginal and limited by additional costs from defects not identified at MOT deteriorating and thereby requiring more expensive repairs (e.g. increased call outs for tyre defects), as well as increased insurance premiums. The current maximum cost of an MOT is £54.85 and it was noted that this amounts to little more than 1% of the annual motoring costs for the average household. Therefore, considering the potential impact this change might have on the safety of our roads, and the at best limited savings to motorists, we have taken the decision not to change the date of first MOT for cars, vans, and motorcycles.

The responses to the consultation were broadly supportive of introducing more effective testing for diesel emissions, which would have significant air quality benefits. We are working closely with the Driver and Vehicle Standards Agency on a trial of the relevant particle number machines, and estimating the impacts of an improved diesel emissions test. We will consider the results of those trials before deciding whether to implement this measure. A key part of this consideration will include balancing costs against benefits, as we are keen to ensure any changes to testing do not impose disproportionate costs on the motorist.

There was also a great deal of interest in the future of MOT testing and how it should adapt to new technology. The main areas we have identified to take forward are:

Electric Vehicle Testing- with the increasing number of electric vehicles on our roads it is important we understand how they should be proportionally tested at MOT to reassure drivers of their safety.

Hybrid Vehicles- at present the combustion engine is not tested for emissions, potentially resulting in highly emitting vehicles on our roads.

Advanced Driver Assistance Systems (ADAS)- ADAS systems of various kinds, such as automated lane keeping have been introduced, these have implications for road safety that suggest they should be considered in the MOT.

Automated Vehicles- working with The Centre for Autonomous Vehicles (CAVPASS) and industry we will begin considering how the conclusions from ADAS testing relate to testing for autonomous vehicles and the role of the MOT in testing them.

Electric Light Goods Vehicles- at present light goods vehicles with electric engines are often tested with the more rigorous HGV requirements due to their weight. These vans could be aligned with combustion vehicles to reduce the testing burden on them and help encourage take-up.

We will work with industry to develop and phase implementation of these priorities to allow the MOT to adapt to the future of motor transport and continue to maintain its important role in the UK's excellent road safety record. We will also continue to explore the delivery of the MOT in a future of connected vehicles in which ongoing tests may look significantly different.

Annex A - Vehicles in scope of the consultation

Classes 1 and 2

- motorcycles
- motorcycles with sidecar (class 1 engine size up to 200 cm3)

Class 3

- 3-wheeled vehicles (up to 450kg unladen weight)

Class 4

- cars (with up to 8 passenger seats) and 3-wheeled vehicles (up to 450kg unladen weight)
- 3-wheeled vehicles (over 450kg unladen weight)
- quads (max unladen weight 400kg – for goods vehicles 550kg and maximum net power of 15w)
- dual purpose vehicles
- private hire vehicles and public service vehicles (with up to 8 seats)
- goods vehicles up to 3,000kg (design gross weight)

Class 7

- goods vehicles over 3,000kg up to 3,500kg (design gross weight)