Changes to the date of the first MOT test and research into other MOT enhancements

RoSPA's response to Department for Transport's consultation

March 2023

Response to Department for Transport's consultation: Changes to the date of the first MOT test and research into other MOT enhancements

Introduction

This is the response of The Royal Society for the Prevention of Accidents (RoSPA) to the Department for Transport's consultation on changes to the date of the first MOT test and research into other MOT enhancements. It has been produced following consultation with RoSPA's National Road Safety Committee. Our response also includes the results of a survey of RoSPA members. We have no objection to our response being reproduced or attributed.

The consultation seeks views on whether the Department for Transport should change the timeframe for the first date a vehicle should be MOT tested and evidence and views on other changes to MOT testing.

Response to Department for Transport's consultation: Changes to the date of the first MOT test and research into other MOT enhancements

About you

Are you responding as an individual or on behalf of an organisation?

On behalf of an organisation.

What is the size of your business by number of employees?

50-249.

Do you work for or own a company that carries out MOT testing?

No.

Response to Department for Transport's consultation: Changes to the date of the first MOT test and research into other MOT enhancements

Changing the date of the first MOT and other proposals for change in 2023

In your view, should the date of the first MOT

- **remain at 3 years**
- **move from 3 to 4 years**
- **move from 3 to 5 years**

RoSPA response

Remain at 3 years.

Please explain why you hold this view.

RoSPA response

RoSPA thinks that the date of the first MOT test should remain at three years after registration. We do not believe that the potential cost savings justify the potential increased risk of extending the period before a vehicle must pass its first MOT. Paying for an MOT one year earlier is a small price to pay for road safety.

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

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

In 2021, DVSA data revealed that 13% of cars fail their first MOT test at the three years, the equivalent of 280,000 vehicles[1]. Between July and September 2022, 6% cars and light vans failed their MOT test due to tyre defects, 6%

[1] Essential Fleet Operator (2021) 'DVSA data reveals 13% of three-year-old cars failed their first legally required safety check last year, the equivalent of over 280,000 cars in 2021'

https://myessentialfleet.co.uk/dvsa-data-reveals-13-of-three-year-old-cars-failed-their-first-legally-required-safety-check-last-year-the-equivalent-of-over-280000-cars-in-2021/
Date accessed: 14/02/2023.

of vehicles failed due to brake failures, 11% failed due to problems with lamps, reflectors and electrical equipment, 2% had steering defects and over 8% had suspension defects. These are all failures in safety-critical items. MOT testing can help to identify the failure of safety related components on vehicles, for us, any extension to the period before MOT testing would increase road risk.

In addition, in 2021, 464 people were killed or seriously injured in a collision in which a vehicle defect was deemed to be a contributory factor. Of these, 123 were killed or seriously injured in a crash where the tyres of the vehicle were illegal, defective or under inflated and 264 people were killed or injured in a crash where defective brakes, steering or suspension were a contributory factor. RoSPA cannot support any change that is likely to increase the number of people likely to be killed and seriously injured on our roads.

One of the main effects anticipated from delaying the date of the first MOT is that more vehicles could be on our roads in an unroadworthy condition that would have been spotted at their initial three-year MOT, which will result in mote vehicles more vehicles failing their initial MOT a year or two later. This could translate to an increase in the number of collisions where a vehicle defect is a contributory factor.

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

Despite the cost saving to the consumer of not having to pay for an MOT after three years, not picking up a defect in the three-year MOT could cost the motorist more over time. As noted in the impact assessment, if vehicle defects which would have been identified and repaired during the three-year MOT are not noticed until the four-year MOT, there are likely to be several impacts on the cost of repair. Firstly, there are likely to be inflationary price rises, which could increase the cost of repairs. It is also likely that over the period of a year, the defect will worsen. For example, a minor suspension defect could lead to a more serious problem in the suspension, or wear the tyres more quickly, which will be more costly to repair than if the defect was picked up earlier. The paper also notes that analysis provided by the DVSA demonstrates that, whilst 58% of vehicles have an annual MOT, the later a vehicle is to get an MOT, the worse the failure rate. Data from 2016 to 2022 shows that the average MOT failure rate for those who MOT annually is 34% compared to 42% for those 3-8 months late (15 to 20 months since last MOT).

RoSPA surveyed its members to understand views on this proposal. Of the 56 responses received, 70 per cent of members believed that the MOT should remain at three years. 13 per cent of respondents would support a move to four years and 18 per cent supported a move to five years. When asked the reasons for their views, many of those who believed the timings should remain the same felt that any changes could lead to an increase in collisions and injuries. A proportion of members also believed that any changes to the MOT testing schedule should be based on mileage rather than the age of the vehicle. Those who supported changes to the current timings typically stated that vehicle safety has improved since the MOT was introduced.

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In your view, should changes be introduced alongside changing the date of the first MOT test to mitigate any effects on road safety (for example, re brake and tyre wear) or polluting emissions

- **additional safety information campaigns for drivers**
- **additional odometer checks?**
- **DfT publicity to ensure that motorists keep their vehicles safe ahead of the date of first MOT test?**
- **ensure vehicle service packages include items that are also covered in the MOT**
- **other (please specify)**

RoSPA response

We do not believe that the first date for testing should be moved from three years, but if it is, we believe that the following measures should be implemented:

- additional safety information campaigns for drivers
- DfT publicity to ensure that motorists keep their vehicles safe ahead of the date of the first MOT test
- Ensure vehicle service packages include items that are also covered in the MOT.

As part of this package of change, we are proposing to move to particulate number (PN) testing as a more robust emissions assessment for modern diesel vehicles. Do you believe that this is the correct approach, and why?

RoSPA response

RoSPA is not in a position to comment.

Do you have any views on how we should implement PN Testing (likely to be post 2013 diesel engine vehicles) such as phasing in the requirement for garages to invest in PN testing equipment?

RoSPA response

RoSPA is not in a position to comment, although a phased approach would sound sensible to allow MOT garages to procure the required equipment.

Call for evidence on changes to MOT testing

What do you think are the advantages of the current system of requiring vehicles to undergo an annual MOT test:

- **road safety**
- **environmental protection**
- **fewer breakdowns**
- **other advantages**
- **there are no advantages**
- **unsure**

RoSPA response

- road safety
- environmental protection
- fewer breakdowns

Why do you hold this view?

RoSPA response

One of the key advantages of the current system is road safety benefits. MOTs are part of the system that promotes road safety through measures that aim to make drivers, vehicles and roads safer. Safer vehicles play a key part as a pillar of the safe system. As highlighted in our earlier response, road crashes and casualties in Britain have fallen substantially, and one of the reasons for this is the current MOT testing regime, which helps to minimise the number of unroadworthy vehicles on our roads. The emissions testing element of MOT testing also provides some level of environmental protection.

The current testing system in which vehicles are MOT-tested at three-years-old may also help to pick up less serious defects earlier, preventing these becoming a more serious problem that can result in breakdowns and even collisions. If the first MOT testing date changed, a vehicle would undergo a longer period between being built and its first MOT, and it is reasonable to expect that the vehicle would be more likely to fail its first MOT. As defects become more serious over time, the current testing system likely reduces the number of serious defects and breakdowns. This in turn can reduce repair costs for motorists.

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Frequency of testing

In your view, should MOT tests for cars be required:

- **annually (from the time the car is 3 years old)**
- **every 2 years (from the time the car is 3 years old)**
- **every 2 years (from the time the car is 3 years old up to 10 years and annually thereafter)**
- **other (please specify)?**

RoSPA response

Annually, from the time the car is three years old.

Please could you explain your view further? (150 words max)

RoSPA response

RoSPA believes that the date of the first MOT test should remain at three years after registration. We do not believe that the potential cost savings justify the potential increased risk of extending the period before a vehicle must pass its first MOT. 63 per cent of RoSPA members who responded to our survey believed that the test should be conducted annually from the time that the car is three years old.

In addition to the potential negative effects on road safety, in 2022, the results of a survey published by the RAC[2] suggested that the public are not in favour of changing the MOT to being less frequent. More than half (55%) of the 1,435 drivers surveyed by the RAC said they felt changing the MOT to every two years was a bad idea. Just over a fifth (22%) said they thought it was a good idea while a similar proportion (23%) were unsure.

When asked why they felt it was a bad idea, the overwhelming majority (98%) said it would result in more unsafe vehicles on the road while a fifth (20%) thought it would lead to an increase in the number of collisions on the road. Almost two-thirds (61%) believe it would result in more vehicles breaking down.

[2] RAC (2022) 'Majority of drivers believe changing the MOT to every two years is a dangerously bad idea' https://www.rac.co.uk/drive/news/motoring-news/majority-of-drivers-believe-changing-the-mot-to-every-two-years-is-a-danger/ Date accessed: 02/03/2023.

In your view, should MOT tests for motorbikes be required:

- **annually (from the time the motorbike is 3 years old)**
- **every 2 years (from the time the motorbike is 3 years old)**
- **every 2 years from the time the motorbike is 3 years old up to 10 years and annually thereafter**
- **other (please specify)?**

RoSPA response

Annually, from the time the motorbike is three years old.

Please could you explain your view further? (150 words max)

RoSPA response

Reflecting our response above, RoSPA believes that motorbikes should be tested annually from the time that they reach three years old to reduce the incidence of collisions as a result of vehicle defects. 63 per cent of RoSPA members who responded to our survey believed that the test should be conducted annually from the time that the motorcycle is three years old.

In your view, should light goods vehicles up to 3.5 tonnes be required:

- **annually (from the time the vehicle is 3 years old) that is, no change**
- **every 2 years from the time the vehicle is 3 years old**
- **every 2 years from the time the vehicle is 3 years old up to 10 years and annually thereafter**
- **other (please specify)**

RoSPA response

Annually, from the time the vehicle is three years old.

Please could you explain your view further? (150 words max)

RoSPA response

RoSPA believes that all vans, class 4 and class 7, should continue to be subject to an MOT at three years after they were first registered. 80 per cent of RoSPA members who responded to our survey believed that the test should be conducted annually from the time that the light goods vehicle is three years old. Five per cent believed that these vehicles should be tested annually from registration.

The 2016 consultation noted that light vans typically have significantly higher mileage than cars, at year three a car has on average done around 32,000 miles while vans have done more than 70,000 miles. In 2021, the average mileage at year three for class 4 was 25,379 and for class 7 (vans between 3 and 3.5 tonnes) it was 58,539. This is potentially significant because MOT failure rates increase for vehicles which do more miles. Therefore, RoSPA would strongly disagree with any proposal to increase the time between MOT tests for these vehicles.

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

What effect do you think that any move to less frequent MOTs could have on:

- **road safety**
- **the environment**
- **vehicle crime**
- **consumer protection**
- **any other factor**
- **I can't think of any effects of having less frequent MOT testing**

Please provide any evidence that supports your view.

RoSPA response

RoSPA believes that any move to less frequent MOTs could have negative impacts on the safety of our roads. In 2021, 464 people were killed or seriously injured in a collision in which a vehicle defect was deemed to be a contributory factor. Of these, 123 were killed or seriously injured in a crash where the tyres of the vehicle were illegal, defective or under inflated and 264 people were killed or injured in a crash where defective brakes, steering or suspension were a contributory factor.

Given that vehicles are more likely to fail their MOT as they get older and have higher mileage, we would expect any less frequent testing to mean that some defects go unnoticed, leading to an increase in collisions where vehicle defects are a contributory factor. Less frequent testing is also likely to mean that there are an increased number of vehicles that are not in a roadworthy condition on our roads. Given that safer vehicles are a pillar of the safe systems approach, this proposal seems counterproductive.

If MOT frequency is reduced, to what extent do you think vehicles are more or less likely to be maintained to legal standards:

- **much more likely**
- **more likely**
- **no change**
- **less likely**
- **much less likely**
- **don't know**

RoSPA response

Less likely.

Why do you think this (include any evidence that supports your view)?

RoSPA response

MOT testing is a legal requirement. The approach of an MOT date is often used as a prompt by vehicle owners to have their vehicle checked, and if necessary repaired, before the MOT. Less regular MOT testing could lull vehicle owners into a false sense of security, sending the message that frequent vehicle checks are less important as vehicle safety improves.

Although if these proposals go ahead, information campaigns and adding MOT items to services would be a positive step, neither of these measures are legal requirements, and we therefore think that it is less likely that motorists will maintain their vehicle to roadworthy standards.

The paper suggests that vehicles are regularly serviced and inspected. RoSPA would be interested to understand whether any data is available on the proportion of motorists who have their vehicle serviced annually. We would expect that a larger proportion of newer vehicles will have a full service history, as not doing so may invalidate the vehicle warranty. However, we would expect that older vehicles are less likely to have a full service history. The average age of vehicles on UK roads is eight years old.

There is also some evidence that motorists do not regularly check that their vehicle is roadworthy between MOTs and services. RAC research[3] found that just a fifth of drivers (19%) say they always check their cars are 'road-

[3] RAC (2022) '12 essential car maintenance checks you should definitely be doing'

https://www.rac.co.uk/drive/advice/know-how/regular-car-checks/
Date accessed: 15/02/2023.

ready' for making a trip. Half of drivers (51%) said they sometimes check their cars over before setting out but an alarming 30% said they never do.

In your view, if you believe that your vehicle had a fault, either through a warning light or your own knowledge, before it's MOT due date, how likely would you seek a repair of your vehicle?

- **very likely**
- **likely**
- **unsure**
- **unlikely**
- **very unlikely**
- **don't know**

RoSPA response

RoSPA, as an organisation, is unable to comment on a question that is targeted at individuals.

What measures should we introduce to mitigate the risks of less frequent MOT testing (tick all the choices that reflect your view)?

- **allowing testers to remove panels to check that vehicle emission reduction systems in traditional (internal combustion engine) cars are present and in working order or to identify other safety issues**
- **service reminder at 2 and 3 year licensing point**
- **changes to MOT advisories for brakes and tyres (where a tester warns the owner of issues which need attention but are not severe enough to mean an MOT failure)**
- **communications from government with vehicle tax reminders about significance of servicing, tyre and brake reminders**
- **I don't consider there to be any increased risks of less frequent MOTs so therefore no mitigations are required**
- **other (please specify)**

RoSPA response

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RoSPA does not agree with making MOT testing less frequent, but if this were to go ahead we would expect the following measures to be in place:

- allowing testers to remove panels to check that vehicle emission reduction systems in traditional (internal combustion engine) cars are present and in working order or to identify other safety issues
- service reminder at 2- and 3-year licensing point
- changes to MOT advisories for brakes and tyres (where a tester warns the owner of issues which need attention but are not severe enough to mean an MOT failure)
- communications from government with vehicle tax reminders about significance of servicing, tyre and brake reminders.

Testing of specific vehicles

How does the MOT (or other roadworthiness testing) need to change to accommodate the differences between electric and hybrid vehicles and traditional internal combustion engine vehicles?

RoSPA response

RoSPA is unable to comment on the technical aspects of this question but would expect that these vehicles need to be tested to higher standards than internal combustion engine vehicles given that they have a battery. A way of testing the battery health of these vehicles must be considered.

If garages only wish to maintain and test electric vehicles, do you think we should allow authorisation without the equipment needed for testing internal combustion engines?

RoSPA response

Yes.

Goods vehicles typically have higher mileage than cars / motorbikes and will therefore have more wear and tear, what specific mitigating measures for large vans should we consider? (for example, MOT tests for vans could be required every 50,000 miles)

RoSPA response

Given that vans and goods vehicles typically have higher mileage than cars and motorcycles, RoSPA thinks that it could be a good idea to consider whether a mileage threshold should be introduced at which time an MOT would be required, even before the three years from registration test or in between the usual one year period between MOTs. RoSPA is not in a position to comment on what mileage should be covered before an MOT is required, this should be based on MOT data, which is likely to show at what mileage threshold vehicles become significantly more likely to fail the test.

In your view, should the exemption for historic vehicles need to be reviewed? Why?

RoSPA response

RoSPA has no evidence to provide on how this change has worked in practice and is therefore not in a position to comment.

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Content of testing

What changes do you think should be made to elements of the current MOT test for cars, motorbikes and vans? This could be elements that should be added to or removed from the current test or tested in other ways:

- **alternative ways of testing the main failure items such as brakes and tyres**
- **other actions to ensure the emission control technology fitted to cars is operating correctly**
- **enhanced testing of noise emissions**
- **testing of window tinting**
- **change approach on advisory standards (tyres, brakes near safety critical levels)**
- **other (specify)**

RoSPA response

RoSPA has no comment.

Are there methods that could be applied at the MOT test to assess the performance of NOx control systems on petrol and diesel vehicles?

RoSPA response

RoSPA is not in a position to comment.

Should we use the MOT to collect fuel and energy consumption data on cars and vans to help understand what CO2 emissions are being produced in the real world? (This will not impact on whether a vehicle passes or fails its MOT). Explain with clear reasoning why you are for or against this proposal.

RoSPA response

RoSPA is not in a position to comment.

What enhancements to the MOT could be made to tackle the issue of excessive vehicle noise and are there suitable technological solutions that would enable a metered sound level test to be undertaken in a typical MOT garage?

RoSPA response

Although RoSPA agrees that it would be sensible to make enhancements to the MOT to tackle the issue of excessive noise, which causes considerable annoyance in communities and has negative impacts on the environment, we are not in a position to comment on what these enhancements should be.

Do you agree with including hybrid vehicles within scope of MOT emissions testing? Please explain the reasons for your answer.

RoSPA response

RoSPA agrees. As the paper states, in 2021-22 there were more than 550,000 MOT tests on hybrid vehicles, and 70,000 tests on electric vehicles. This is a significant number of vehicles, and the trend to move to hybrid and electric vehicles is likely to accelerate over the next decade.

With hybrids becoming a larger proportion of the cars on the road, the lack of a check of the emissions performance of hybrids during MOTs is a significant issue which affects the ability to identify whether these newer vehicles are polluting or contributing to existing or new air quality issues. RoSPA therefore believes that if possible, hybrid vehicles should be within scope of MOT emissions testing.

How can the emissions of hybrid vehicles be tested effectively at the MOT test given that their engines will not always be active in a stand-still position?

RoSPA response

RoSPA is not in a position to comment.

Should we explore options for assessing the health of an electric vehicle-specific components, for example, battery, motor?

RoSPA response

RoSPA agrees. A damaged battery could have safety implications if it fails in use. As the paper states, with ongoing technology advancements, data may increasingly be available to assess the health of the battery in an electric vehicle.

Due to their heavier powertrains, should the current 3.5t weight limit for MOTs be increased to 4.25t for zero emission vans, removing the need for them being subject to HGV testing? Please explain your reasoning.

RoSPA response

RoPSA agrees. Zero emission vans are typically heavier than their petrol or diesel equivalents, due to the weight of their powertrains and to maintain their payload capabilities. This can take them over the current 3.5 tonne MOT testing threshold to about 4.25 tonnes. Without this change, there could be increasing pressure on heavy vehicle testing capacity.

Should EV conversions (also known as retrofit) be checked at an MOT to verify that an EV conversion has taken place - enabling the DVLA to verify a conversion prior to amending the vehicle record (and VED rate). If this was introduced, do you think the check should be extended to check the safety of any conversion – in which case do you think additional training would be needed to ensure safety for MOT testers?

RoSPA response

RoSPA is not in a position to comment.

In your view, should we use the MOT to encourage drivers to have faults on recalled vehicles rectified?

RoSPA response

RoSPA believes that the MOT could present the opportunity to encourage drivers to have faults on vehicles rectified and would support this proposal. This would be a positive change for road safety and could help to reduce the number of vehicles on the road with potentially dangerous defects.

Do you think we should move to failing vehicles at MOT where the vehicle has a longstanding recall that has not been rectified?

RoSPA response

Yes. In some cases, recalls can be so safety critical that the manufacturer will advise the owner not to drive their vehicle until the potential fault has been rectified. Continuing to drive the vehicle with a defect puts the driver, occupants, and other road users at risk.

Do you think DfT should take additional measures to combat mileage fraud? If so, what should those be?

RoSPA response

RoSPA would agree with measures to combat mileage fraud being enhanced, but is not in a position to comment on what these enhancements should be.

Do you believe that any apparent mismatches between the government licensing record for a vehicle and the vehicle presented for an MOT test should be dealt with before an MOT test is carried out? Explain your reasoning.

RoSPA response

RoSPA is not in a position to comment.

What approaches could be used to roll out of changes to the test where significant investment is required by MOT garages in new equipment or training?

RoSPA response

RoSPA cannot comment on specific measures, but it would seem sensible that a phased approach is used.

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Improving the MOT service

Do you believe that fraud in the system is a problem? What evidence or data do you have to support that view, and, if it is a problem, do you have any proposed solutions?

RoSPA response

RoSPA is not in a position to comment.

Should garages be required to have:

- **equipment that automatically collects data in the test from the likes of brake testers**
- **take photographs at the test that identifies the vehicle (and share this with DVSA)?**

RoSPA response

RoSPA has no further comment.

How could investment in data collection and/or photographic equipment be encouraged (for example, DVSA could publish information on which garages have such equipment thereby encouraging consumers to prefer those garages)?

RoSPA response

RoSPA has no further comment.

Do you think that the results of DVSA enforcement checks at MOT garages should be published to help motorists make informed choices on where they have their vehicle tested?

RoSPA response

RoSPA would support this proposal. This information would allow consumers to make an informed choice on where they have their vehicle tested. Although the majority of testers are likely to deliver testing to meet standards and offer good customer service, the publishing of this information could encourage the small proportion of garages who do not do so to improve their service.

Do you think DVSA approvals of MOT garages should consider non-technical factors such as service to the consumer and wider service offerings?

RoSPA response

No. RoSPA thinks that it would be unfair to rate garages based on their service offerings, as some garages will only provide limited services and products. The quality of testing and service should be more important than the number of products and services a garage is able to offer to customers.

Do you think government should do more to drive compliance with getting an MOT on time? What do you suggest and why?

RoSPA response

As the paper states, over 30% of MOTs are conducted late, indicating that more needs to be done to ensure that motorists get their MOT on time. This concerning statistic should also be considered against the proposals to test vehicles less frequently, as a proportion of motorists don't get their vehicle tested on time, placing themselves and others at risk if a dangerous defect goes undetected. Simple reminders, such as those sent via email to motorists, could be an effective measure.

Alongside this, the Department could consider commissioning research to understand why it is that a proportion of motorists do not get their MOT on time. This could help to understand the motivations behind this behaviour and any barriers that this group face, which could help to inform solutions.

Do you think the penalty levels for wrongdoing of MOT garages and testers should be more severe? Should other options be considered – such as banning MOT testing at a site where serious wrongdoing as occurred?

RoSPA response

RoSPA would support preventing MOT testing being done from a garage site that has been used for fraudulent MOT activities.

Where MOTs have been found to be done wrongly – do you think DVSA should be able to correct the record – including revoking MOTs incorrectly issued?

RoSPA response

RoSPA would agree with this proposal.

Do you have ideas for more MOT data that could be shared and what benefits it may bring?

RoSPA response

RoSPA has no further comment.

Services to garages

Do you think the current approach to training and assessment for MOT testers works as well as it should? How can it be improved?

RoSPA response

RoSPA is not in a position to comment.

Do you think the approach and level of enforcement is right for keeping the MOT industry standards where they should be – and avoiding those that do the job right being undermined? How could the system be improved?

RoSPA response

RoSPA is not in a position to comment.

Costs and fees

Do you think the current regime encourages and facilitates investment in MOT testing stations? If not, what changes could improve this?

RoSPA response

RoSPA is not in a position to comment.

How might any negative effect on investment in MOT testing stations caused by reductions in MOT frequency be mitigated?

RoSPA response

RoSPA is not in a position to comment.

Evidence on the costs of any changes to the content of testing would be welcome.

RoSPA response

RoSPA has no further comment.

Longer term

What alternatives might there be to assure roadworthiness of cars, vans and motorbikes that might replace or supplement the MOT?

RoSPA response

RoSPA has no further comment.

To what extent do you agree/disagree with the following statement "the MOT system needs to change to include tests of new features/types of vehicles for example Advanced Driver Assistance Systems (ADAS)"

RoSPA response

Strongly agree.

Please could you explain your view further? (150 words max)

RoSPA response

As the paper states, there is evidence that an increasing number of new vehicles contain ADAS features and these will become more common as vehicles are updated.

As these features become increasingly common, we expect that motorists will have increasing confidence that they systems will work as expected, and although they are there for assistance and are not designed to be relied upon, motorists will expect them to perform when required. As motorists will increasingly use these systems, RoSPA believes that these features should be tested as part of the MOT.

Should a vehicle fail an MOT if an ADAS safety feature, such as Advanced Emergency Braking (AEB), is indicated as malfunctioning by the vehicle? If so, should this be only for mandated features or include features fitted voluntarily?

RoSPA response

RoSPA believes that a vehicle should fail the MOT if an ADAS safety feature is indicated as malfunctioning by the vehicle, if this is a mandated feature. Any faults with features fitted voluntarily should also be raised with the motorist.

In the longer term there could be the potential to use data from vehicles to continually monitor key roadworthiness features. At such a point do you still think that the periodic inspection of a vehicle is necessary?

RoSPA response

RoSPA does not believe that it is possible to predict at this stage.

Do you think automated systems could enable all safety critical systems and components to be checked without garage inspection?

RoSPA response

Although this could become the case in future, it is difficult to predict at this stage.

What would a test for hydrogen powered vehicles need to look like?

RoSPA response

RoSPA is not in a position to comment.

Vehicles with self-driving features

At what point could the Authorised Self-Driving Entity (ASDE) take on responsibility for roadworthiness requirements, and for what elements should it be responsible?

RoSPA response

RoSPA has no further comment.

What should the MOT test on vehicles with self-driving features, and how should these be tested?

RoSPA response

RoSPA is not in a position to comment.

Do any elements of the testing of self-driving features need to be addressed through a different mechanism?

RoSPA response

RoSPA does not believe that this is possible to predict at this stage.

RoSPA has no further comments to make on the consultation process, other than to thank the Department for Transport for the opportunity to comment. We have no objection to our response being reproduced or attributed.