

## SMMT POSITION ON THE MOT TEST REGIME OCTOBER 2011

### Background

This paper outlines SMMT's position on the MOT test regime, in anticipation of a review of the regime, which is expected to commence later this year. SMMT strongly supports the current MOT test regime, which is critical in ensuring the safety and performance of vehicles on UK roads, and also directly supports many jobs within the sector.

### Current MOT regime

The current MOT test regime for cars and vans is aimed at checking that vehicles are kept in a roadworthy condition. This includes meeting both road safety and environmental standards. New vehicles are required to complete an MOT test 3 years after purchase, and annually thereafter (known as 3-1-1). Across the EU there are differing MOT regimes, with a 4-2-2 system as the least frequent regime permitted.

The MOT regime is an important part of maintaining the UK's high road safety standards. At present the UK has some of the safest roads in Europe. In 2009, UK road deaths per million inhabitants numbered 38, the second lowest in the EU behind only Liechtenstein (28), and compared to an EU average of 70. The safety of UK roads is also continually improving: in 2010 there was an 8% reduction in people reported killed or seriously injured on UK roads. SMMT supports an integrated approach to improving road safety, and views the current MOT regime as a key example of all stakeholders taking responsibility to ensure vehicle safety.

In addition, in the UK it is very common for motorists to use the MOT as a check on the need to have their vehicles serviced. While this should not be a substitute for regular servicing of vehicles between tests, it does impose another discipline which helps maintain the standards of the vehicles on our roads.

MOT tests include the checking of compliance with environmental standards. This is important, as the industry is ever reducing CO<sub>2</sub> emissions, air pollutants and noise from new vehicles. Regularly tested, well maintained and serviced vehicles support consumers, businesses, industry and government in limiting the environmental impacts of daily car use. The industry has reduced new car CO<sub>2</sub> emissions by almost 27% since reporting began in 1997 and is continuously working to reduce emissions and environmental impacts in the production of vehicles, during their use, and at the end-of-life stage. It is critical that emissions from vehicles are regularly tested throughout their life-cycle.

### SMMT position

- MOT objective - The MOT is an essential check on the safety and roadworthiness of vehicles. Any review of the scheme or test frequency needs to maintain this primary objective. Proposals for change need to be assessed against this objective and should not be driven by deregulatory priorities or cost saving targets.
- Frequency - The current 3-1-1 scheme for cars should be maintained on safety and environmental grounds. Reducing the frequency of testing cannot be justified in light of the move at a European level to reduce road deaths by 50% by 2020, due to the adverse affects this would have on safety. A TRL report, 'Effect of vehicle defects in road accidents' (April 2011) on the potential impact of moving to less frequent MOT testing, shows that this would result in an increase in fatalities. This would clearly be in opposition to government's stated objectives in its 'Strategic Framework for Road Safety' (May 2011).
- Vans – Vans are currently treated under the MOT regulations in the same way as cars, despite covering a considerably higher average annual mileage (approximately 12,000km more) and having a much more demanding operating cycle. Vans have an initial failure rate of 50% which is significantly higher than any other vehicle category. SMMT believes that vans should be tested annually (a 1-1-1 scheme), in order to safeguard against potential faults incurred from this additional mileage.

(continued)

- MOT review - Any review of the MOT regime must be based on sound evidence, impact assessment and economic analysis. This would highlight the safety risks, true economic benefits, and cost savings of any changes for consumers, businesses and the government. Consideration should also be given in any review to see if there are other areas of benefit that could be obtained. This may include a review on the feasibility of monitoring vehicle mileages, so as to reduce the potential opportunities for clocking.
- Enforcement - SMMT has an interest in retaining the integrity, quality and consistency of the MOT service experienced by motorists whilst reducing the regulatory burden and enforcement costs for government and business. VOSA endorsement of Motor Codes could provide a suitable way forward that would allow VOSA to target its limited resources more effectively on companies that have not made the commitment to the quality and monitoring regime that Motor Codes runs on behalf of the industry.

SMMT is an active member of both the MOT Forum and the MOT Liaison Group. The MOT Liaison Group is convened by the Department for Transport and includes MOT Forum members, as well as other stakeholders. SMMT has been in correspondence and direct dialogue with Secretary of State for Transport and ministers on a possible MOT review. SMMT intends to continue strong engagement on these issues, working with government, motoring and road safety organisations to ensure the MOT retains its objective and relevance.

### Key facts<sup>1</sup>

- In 2008 the overall rate of vehicles non-compliant to MOT standards in Great Britain's traffic was estimated to be 2.9 per cent
- In 2008 5.8% of all cars in traffic between 3 - 4 years in age (i.e. years since first registered) were non-compliant to MOT standards, and were found to have the highest rates of MOT non-compliance
- In 2009 40.1% of all vehicles failed their MOT test, or needed maintenance or repair work to pass
- In 2010 road casualties numbered 208,655, of which 1,857 were fatal
- In 2010 175,000 people were employed in the maintenance and repair of motor vehicles
- The current maximum cost of an MOT test for a car with up to 8 passenger seats is £54.85
- 62% of people believe there would be more hazardous vehicles on the road if they were MOT tested every other year rather than every year
- 41% of people believe that delaying a vehicle's first MOT test to the fourth year would lead to more defective cars on the road

### About SMMT

The Society of Motor Manufacturers and Traders (SMMT) is one of the largest and most influential trade associations in the UK. It supports the interests of the UK automotive industry at home and abroad, promoting a united position to government, stakeholders and the media.

Motor Codes is a self-regulatory body for the motor industry, with a voluntary membership of thousands of garages all committed to maintaining high standards across new car sales, service and repair and vehicle warranties (<http://www.motorcodes.co.uk/>).

The automotive industry is a vital part of the UK economy with £40 billion turnover and £8.5 billion value added. Accounting for more than 10% of total UK exports and investing £1.5 billion each year in R&D, the industry employs around 700,000 people across the design, development, manufacturing, retail, service and repair of motor vehicles, engines and components sectors.

**To discuss this paper in more detail or for more information, please do not hesitate to contact:**

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<sup>1</sup> Data obtained from DfT, Europa, Directgov, VOSA, TRL and the AA. For further information please contact Josh Harris (contact details above).