



## NTDA responds to DfT consultation on changes to MOT frequency



On the 18th January 2023, the DfT launched a new consultation: **Changes to the date of the first MOT test and research into other MOT enhancements**. The NTDA formally responded to the consultation on 15th February and in this news, we share some of the specific, primarily tyre related, concerns we have raised with the DfT.

As expressed on many previous occasions, it is the view of the NTDA and its members, that the date of the first MOT should **remain at 3 years** for motorcycles, cars and light goods vehicles. Although we agree, that the MOT scheme should be continuously reviewed and enhanced to ensure it is not abused, remains valid and fit for purpose, we do not believe that changing the test frequency will deliver any tangible benefits, to the contrary, we believe it will be detrimental and undermine the validity of the MOT. Such a change is also more likely to lead to both increased safety risks and vehicle emissions, especially as a result of vehicle tampering. The NTDA and its members strongly believe that the current frequency is a primary element in the success of the MOT scheme providing a high level of road safety. In addition, our member's own research predominantly shows that their customers/motorists see it as an annual validation of their vehicle's roadworthiness, (*which should not be confused with vehicle manufacturers own views on reliability*). Representing specifically the tyre distribution and retail trade, we also know that tyres are a major contributory factor both to MOT failures and advisories. To support this, statistics produced by one of our major national retail members for its MOT centres in 2019, show that tyres accounted for almost 15% of MOT failures and 56.5% of advisories issued. DfT statistics for 2019 show that tyres consistently account for 60% of dangerous defects of all defects and it is unsurprising, therefore, that tyres still remain a top reason for MOT failure at first test. Defects such as low tread depth, cuts, sidewall cracking, bulges, splitting etc., are not picked up by new technologies such as TPMS and still require MOT testers to carry out a full visual inspection of the tyre. In fact, irrespective of new technologies such as TPMS, tyre damage and wear, remain high with increased EV and Hybrid vehicle weights, progressively unpredictable and adverse weather and appalling road surface conditions across the UK being key contributory factors in tyre condition deterioration.

Furthermore, in an independent national survey conducted with motorists in 2017, the NTDA established that only 40% of respondents said they regularly check their tyre tread and pressure and 60% did not know the legal tread depth for tyres in the UK. One could readily argue that vehicle technology is indeed improving, but motorists' attitudes to vehicle maintenance and safety is deteriorating. We believe that reducing the frequency of the MOT could be perceived by many motorists as being an indication that the vehicle is self-managing and always safe, resulting in them being even less inclined to carry out their own vehicle maintenance and safety checks on a regular basis. Additionally, we believe that any predicted financial benefits for vehicle owners are simply misleading as only those motorists who can afford vehicles that are less than 4 years old would actually benefit. The mitigating actions described in the DfT consultation, eg. to increase vehicle servicing/inspection levels will equally obviate any saving from changing the MOT test frequency.



The NTDA believes that the advantages of the current MOT system are:

- Current UK road safety record (which speaks for itself);
- Low-cost annual independent validation of vehicles' roadworthiness;
- Identification of issues beginning at year 3;
- Fewer vehicle breakdowns;
- Environmental protection.

Specifically, we believe there should be no change to the MOT frequency for the following reasons:

- MOT tests for cars should be required annually from year 3 onwards. This view has been established from experience and based on NTDA member statistics, DVSA statistics and independent motorist feedback;
- MOT tests for motorbikes should be required annually from year 3 onwards. This view has been established from experience and based on NTDA member statistics, DVSA statistics and independent motorist feedback. Furthermore, motorcyclists are very vulnerable road users and tyre wear is high compared to other vehicles over a similar mileage;
- MOT tests for light goods vehicles up to 3.5 tonnes should be required annually from year 3 onwards. Due to our 'online consumerism' based society, many light goods vehicles are now used for multiple daily deliveries which intensifies the wear and tear on the vehicle's tyres, brakes, steering, suspension etc. Also, many delivery drivers are self-employed and are paid based on the number of deliveries they can make each day. In other words, the drivers want the vehicle on the road so they can deliver against intense delivery schedules and there is limited time and no incentive to ensure a vehicle is maintained in a fully roadworthy condition.

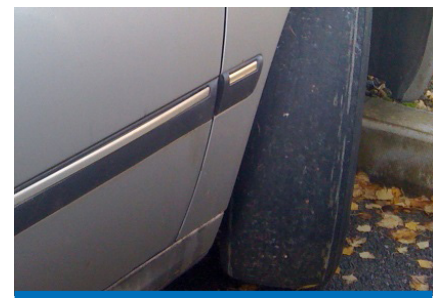
Taking all of the above into consideration it is our view, therefore, that a less frequent MOT will lead to:

- A deterioration in the aforementioned UK road safety record;
- A low-cost annual independent validation of the vehicles' roadworthiness being replaced by much higher repair bills;
- Identification of issues beginning at year 3 deferred to year 4 worsening the condition of the vehicle;
- More vehicle breakdowns;
- Less environmental protection.

To support this view, we refer to DVSA statistics on current annual MOT failures and advisories at year 3 and the feedback from every NTDA member currently involved in MOT testing to support our view.

If MOT frequency is reduced, we believe vehicles will be much less likely to be maintained to legal standards. We live in a society where people have become almost 100% reliant on technology to live their lives. Practical skills and competence are rapidly being replaced by Apps and A.I. cheats. This applies to motorists both in their driving habits and attitudes to vehicle maintenance. eg. "Why check a rear-view mirror when I have reverse camera and sensors?" "Why check my tyres when my TPMS light isn't on?" Nevertheless, NTDA members carrying out pre-MOT servicing on vehicles fitted with all of the latest ADAS, frequently report badly worn tyres and brakes, worn wiper blades, low oil, no screen wash, problems with lights etc. It is our view, that reducing the frequency of the MOT will be perceived by motorists as being an indication that vehicles are so much more reliable, they simply don't need to worry about maintenance. This would be contrary to the Government message coming out of this consultation that a reduction in MOT frequency would need to be counterbalanced by an increase in vehicle maintenance.

Although we do not support a change in frequency, we do believe that there needs to be changes to MOT advisories, specifically in relation to tyres. Too often our member's MOT testers are issuing advisories in relation to, for example, visible sidewall cracking and deterioration. It is our opinion that the integrity of such tyres has been compromised and the vehicle should fail the MOT.



We have also addressed the issue of the DfT referencing EU countries by means of comparison as it is our view that such comparisons are misleading, if not irrelevant, as driver behaviour, attitudes to vehicle maintenance, localised legislation and enforcement, (eg. winter tyres etc.), road and weather conditions, distances travelled, (eg. Malta) can't be compared and the focus should remain on the UK and its MOT situation.

In conclusion, we always consider the following key question, when any changes to MOT frequencies are being considered: **Will the small amount of money and time motorists may save by the proposed delayed first test be outweighed by the consequences?**

As an association, we have yet to be presented with any convincing arguments that demonstrate changing the test frequency is a good idea and/or beneficial and believe the most recent proposed frequency changes would result in a further loss of control and a new and unacceptable high cost to society as a result of additional road traffic accidents which testing at the current frequency helps avoid.