

# MOT – Extending the date of the first MOT from 3 years to 4 years

Department for Transport

Chartered Trading Standards Institute  
response

23<sup>rd</sup> March 2017

## **About The Chartered Trading Standards Institute**

The Chartered Trading Standards Institute (CTSI) is a professional membership association founded in 1881. It represents trading standards officers and associated personnel working in the UK and also overseas – in the business and consumer sectors as well as in local and central government.

The Institute aims to promote and protect the success of a modern vibrant economy and to safeguard the health, safety and wellbeing of citizens by empowering consumers, encouraging honest business, and targeting rogue traders.

We provide information, evidence, and policy advice to support local and national stakeholders.

We have also, as part of our recently revised remit, taken over responsibility for business advice and education concerning trading standards and consumer protection legislation. To this end, we have developed the Business Companion website ([www.businesscompanion.info](http://www.businesscompanion.info))

The CTSI Consumer Codes Approval Scheme was launched in 2013, superseding the OFT scheme ([www.tradingstandards.uk/advice/ConsumerCodes.cfm](http://www.tradingstandards.uk/advice/ConsumerCodes.cfm)).

CTSI is a member of the Consumer Protection Partnership, set up by central government to bring about better coordination, intelligence sharing and identification of future consumer issues within the consumer protection arena.

We run events for both the trading standards profession and a growing number of external organisations. We also provide accredited courses on regulations and enforcement.

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***A key concern for CTSI is that of resources. UK local authority trading standards services enforce over 250 pieces of legislation in a wide variety of areas. They have suffered an average reduction of 46% in their budgets since 2010 and staff numbers have fallen by 53% in the same period.***

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This response has been composed by CTSI Joint Lead Officers for **the Motor Trade, Tim Milsom & Gerald Taylor**. Should you have any queries or wish to discuss the response please do not hesitate to contact either of them at [lomotortrade@tsi.org.uk](mailto:lomotortrade@tsi.org.uk)

Chartered Trading Standards Institute  
1 Sylvan Court, Sylvan Way  
Southfields Business Park  
Basildon, Essex, SS15 6TH  
Tel: 01268 582200  
[www.tradingstandards.uk](http://www.tradingstandards.uk)

## [Extending the date of the first MOT from 3 years to 4 years – a consultation.](#)

### Summary of Issue under consultation

The consultation document sought views on whether the timing of the first MOT test should be extended from three to four years after first registration. Currently over 2.5 million vehicles are inspected for their first MOT every year.

The options in the consultation are –

- Option 1 – No Change. Maintain the current period for vehicles requiring a first MOT at three years
- Option 2 – Extend the first MOT for all vehicles currently requiring an MOT at three years, to four years.
- Option 3 – As Option 2, excluding vans in classes 4 and 7 where the plan will be to maintain the current MOT three year first test timing.

Context –

- The consultation claims extending the first test requirement to four years would introduce a saving to consumers of over £100 million every year.
- The consultation also claims to consider the wider impacts of such a change. With more than 29 million MOTs carried out at over 22,000 garages every year they would be likely to incur a loss of income from any reduction in tests.
- The consultation also claims to consider road safety and possible effects on the environment.

### Consultation questions

#### Question 1 - Do you think the date of the first test should be moved from three to four years?

*CTSI response*

*No. based upon the available options– Indeed there is an argument for reducing the first MOT to two years.*

- *With the increase in potential clocking of PCP bought vehicles, extending the first MOT by a year means that another 2.2 million vehicles will not have their mileages logged.<sup>1</sup> (86% Of new car sales are PCP purchases – 2.63m cars sold in 2015). This will be a major gap in tracing vehicle mileage histories.*
- *At the three-year period alone this change could see 400,000 unroadworthy cars on the road for another 12 months (20% of vehicles fail their first MOT<sup>2</sup>). Less and less consumers carry out even basic tests such as checking their lights work and their tyres are legal. The 3 year MOT has provided a belated back up for these shortcomings. Any change extending this could mean more accidents on Britain's roads.*
- *Build quality is probably better than it has ever been however the condition of Britain's roads combined with high mileages mean that modern cars should be checked more often - not less often.*
- *This proposal could cost consumers more in repairs as faults will develop causing more expense.*

<sup>1</sup> <http://www.mototrader.com/motor-trader-news/automotive-news/pcp-car-clocking-rise-24-04-2015>  
<http://www.whatcar.com/news/car-clocking-how-much-of-a-problem-is-it/>

<sup>2</sup> <http://www.roadsafetygb.org.uk/news/2184.html>

**Question 2 - If testing of vans remained at 3 years, should this include -**

- **All vans (class 4 and class 7)?**
- **Just larger vans in class 7?**

*CTSI response*

*No, for the reason given above and taking into consideration that commercial vehicles will cover greater mileages and potentially pose greater risk.*

**Question 3 - What evidence do you think should be taken into account in respect of changes to the first MOT test?**

*CTSI response*

- *The current high levels of failure from MOTs at year 3*
- *The potential increase in the car clocking window based upon extrapolation of current figures as owners of PCP contract cars seek to have their odometer illegally reduced to avoid mileage penalties.*

**Question 4 - Are the proposals proportionate to the policy objective to balance the burden on consumers while supporting road safety?**

*CTSI response - We believe it is not proportionate and that there will be a reduction in road safety and an increase in consumer detriment - including a greater opportunity to 'clock' vehicles which will put consumers at greater risk.*

*CTSI has no comment on the remaining consultation questions.*