

The 4-1-1 on the MOT

Government consultation has begun so what impact will changing the MOT have?

IT IS the story that the aftermarket has been waiting on for 18 months, and it officially broke on a sleepy Sunday morning in the throes of winter, a time when plans should be turning to how a day off is spent rather than reading through government documents.

The sceptic in me would suggest that the decision to announce the consultation on the 4-1-1 MOT proposal is an attempt to bury it, ensuring that it doesn't get a lot of coverage and can slip in under the radar to acceptance. However, we have been prepared for some time, awaiting this news, and suddenly all thoughts of a stroll along the Medway in the fresh air are out the window as the 33-page paper rolls off my printer.

The result of that Sunday morning, the sacrificed morning stroll along the Medway and through the grounds of Rochester Castle are borne out in this article with the hope that you, along with many others in the industry, will do your best to fight against the proposals and back the MOT for new vehicles coming in at three years.

What's happening?

Firstly, some background. In July 2015, during his budget speech in the House of Commons, then-Chancellor George Osborne announced the new Vehicle Excise Duty rates that would apply to vehicles sold in the UK after April 1st 2017. Following this was his announcement that the government would suspend the MOT on new vehicles for an extra year, from three to four, giving us a 4-1-1 system.

While not directly mentioned, many took the news as a pacifier for those buying new vehicles with the increased VED, while also labelling the MOT as a 'burden'. Since then, there have been changes to government, a new Prime Minister, new Chancellor and a new Cabinet. However, as the proposal was mentioned in Parliament, it had to go to consultation. The question was when it would.

The consultation

The answer is – now. In fact, at the end of January the DfT published its consultation and options which it invites people to comment on, is open until April 16th 2017.

The full consultation document has been published online (bit.ly/4yearMOT) and makes for some interesting reading, with a number of key points as well as the three options that the government is considering:

- 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 we will maintain the current MOT three year first test timing.

On the consumer side, as there is no fixed fee for the MOT, just a price cap, the DfT has used an average figure of £45.00 to calculate its findings. It states that: "Savings to consumers are anticipated to be in the region of £109 million should option 2 be introduced, and around £100 million if option 3 was implemented."

The paper also highlights that personal time will be saved, although road users are expected to maintain the roadworthiness of their vehicles through checks and servicing. With some drivers believing the MOT is a service in itself, this may not be a good approach.

On the garage impact side, the paper states: "Any extension to the first test period would result in lost revenue to MOT garages as they would lose the fee for those vehicles no longer requiring the three-year test. Many MOT businesses are small or micro operations, usually carrying out routine maintenance and servicing as well as MOT testing. Garages affected by a loss in revenue will need to look at options for utilising the freed-up resource from doing fewer tests, and may face transitional costs associated with new work or services implemented to fill that gap."

The Department believes that if Option 2 were implemented, there would be 8.3% fewer MOTs carried out, compared to 7.5% less if Option 3 came into force.

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Body position

Since the idea was first announced in 2015, the RMI, GEA and IAAF, together with other leading industry organisations, have reformed the proMOTe campaign under the banner of the Automotive Aftermarket Liaison Group (AALG).

Speaking to Aftermarket, IGA Director Stuart James comments: "At the end of the day, if there is a serious injury or a fatality because of this then it is a step too far. We must remember that the MOT for new cars after three years was established in 1967 and has carried on until today. This has given us a great road safety record. These cars are still subject to the MOT today, and every year millions of cars go into the pool to ensure that they are safe.

"We must also think about the issue with clocking. While there are no official figures on how many vehicles in the UK are clocked, we believe it to be around 12%. This could rise to as much as 25% should these new proposals come in. Let's not forget, the first time a mileage record of a vehicle is made is at the MOT. That would cost consumers money as well, buying a car that has many more miles of wear and tear than they thought, whose value is much less than they paid."

Dave Garratt, CEO of the Garage Equipment Association, adds: "It will take a good chunk of money out of the industry and will knock

it back by a year, but garages might do ok out of it, because if you look at the failure rate at the moment, at three years it is 17%, while at four years it is 19%. Therefore if we miss that first year, the 17% won't be repaired and they will come into the fourth year, making around 36% failure rate. That means that around 780,000 cars on the road will be unsafe. From the industry point of view, that will equate to a lot of repairs.

"However, if you say 30% of cars, with 6% having faults picked up in the extra 12 months, then looking at the driver point of view, do we want such a high failure rate? The consultation states that increasing to four years could result in an increase in road casualties [ranging between 1.89 and 3.53 fatalities, and 20.96 and 39.26 serious injuries a year] never mind the accidents, so I don't know as a society that it is a good idea for a £50.00 saving.

"Failure rates are sitting where they have sat for years, so I don't see how they can say that cars are getting better. If they were, the rate would have dropped. So while the DfT argues that cars are getting better, the figures don't really back that.

"Then you look at the emissions. We are already moaning and groaning about this and the only independent check is done by the MOT. You may say that the pass/fail levels are low on this point, but then we believe that the emissions test limits should be lower too.

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“Compared to others in Europe, we are miles out on these limits. We are already not picking up on DPFs that are faulty or missing and the problem can be added to by extending the MOT.”

Industry response

In the document, section 2.8 states: “In more recent years, modern vehicles have become generally more resilient to wear and tear with improvements in manufacturing techniques and materials, and it now seems appropriate to review the timing of the first MOT inspection for those vehicles requiring a first test at three years.”

The question of wear and tear is not down to just the materials and manufacturing techniques, but also how a vehicle is driven, as well as how far. Components have a rough expected lifetime, but the harder it is used, the more it will wear. Can you expect the brake pad on a car to last through to a four-year MOT if the vehicle has done 100,000 miles? Would the tyres last that long?

There are also external factors to take into consideration. Vehicle suspension is still susceptible to alterations through forces encountered when a car hits a pothole or a sleeping policeman at speed.

A spokesperson at wheel alignment specialists Pro-Align comments: “Misalignment on a vehicle can be a major cause of rapid and uneven tyre wear. In extreme cases of misalignment, it’s entirely possible for a brand-new tyre to be rendered illegal and dangerous in just a month or a few thousand miles of driving because of uneven wear.

“Although this is a particularly extreme example, it does demonstrate why we advise all drivers to have their wheel alignment checked annually or every 12-15,000 miles in addition to other monthly safety checks such a checking tyre pressures or tread depths. It’s also worth remembering that by the time you can visually spot signs of uneven wear on your tyre from misalignment, it’s too late and the damage has been done. A regular alignment check can stop any damage before it’s done.

“While wheel alignment is not part of the MOT test itself, we do know that there are a large number of drivers who do not check their tyres themselves and simply reply on their MOT to identify any problems or issues. If the first MOT inspection moves to four years, then there is a real danger that we will have more cars on our roads driving on badly worn or illegal tyres.”

On the brake pad side, Sadie Jonas, Pagid Business Development Manager IAM adds: “We are certainly confident of our high-quality products and have a 25,000 mile or 25-month Warranty on our Pagid range of Brake Discs and Pads. However, the life of a brake pad is difficult to estimate, and it is very much dependent upon how the brakes are used and the performance of the vehicle. Driving style (braking frequency, speed ranges), traffic conditions, as well as topographic and climatic conditions are most influential on wear behaviour.

“Brake pads are a consumable item and should be checked regularly for wear and damage. The minimum thickness levels will differ depending on the vehicle manufacturers but as a general rule of thumb, brake pads should be replaced before the thickness reaches 2mm.

“Thankfully, most brake pads have a warning device fitted to them and a dashboard warning light is illuminated when the brake pads wear down to a pre-determined limit. Brake parts are consumables so we would certainly recommend that drivers have their brakes checked regularly by a trained professional and certainly not wait for the first MOT to do so.”

The answer

The argument against the MOT extending to a four-year exemption rule could sound very much like an aftermarket issue – garages will lose out on work and the balance of power could be affected.

However, this is not the case. Should the new rules come in, the impact on garages will level out and there is no reason to suggest that cars will stay with the dealerships longer than an extra year at most, and possibly not any longer at all should manufacturers who offer a three-year warranty fail to extend their current arrangements. While a car can go into a non-dealership garage at any time it does seem as though the message is slow to reach drivers.

Instead the issue is one of road safety and consumer awareness of

the issues a delay may cause. Any increase in the number of unsafe vehicles on the roads will lead to more dangerous situations, while an extra year of undiscovered safety issues may cause more damage and result in more work being required. The addition of the threat of numbers of clocked vehicles going up, which will impact on the driver, is another threat. A four-year MOT does not work. It comes back to the old adage – if it ain’t broke, don’t fix it.

What can you do?

There are three ways to respond to the consultation, online, email and in writing, and you have until April 16th 2017 to do so. To read the document and respond online, visit bit.ly/4yearMOT, or you can email the DfT at MOT411consultation@df.t.gsi.gov.uk. If you choose to put pen to paper and write, you can address your letters to:

**Freight,
Operator Licensing and Roadworthiness Division
3/28 Great Minster House
33 Horseferry Road
London
SW1P 4DR**

You can also help Aftermarket draft its response. We are asking garages to Tweet [@aftermarket01](https://twitter.com/aftermarket01) the mileage of any 62 and 13 plate car they have in their garage for servicing or MOT, using **#4yearMOTmileage**. We do not need any other distinguishing information, simply the mileage, which we will collate together in our letter to the DfT.

Discussion points

You can also help by speaking to your customers about the problems with 4-1-1 and try to educate them. The following points are related to the consumer:

- At least 30% of cars at four-years-old will fail their first MOT
- The likelihood of more work being required due to worn parts not being caught early could increase, meaning the customer is faced with a bigger bill
- The consultation states there could be an increase in fatalities – is one life worth £50.00?
- Failure rates have not changed significantly in years, so are cars really more resilient?
- Clocking could increase, meaning customers could be buying a used car with false mileage
- Emissions are a hot topic at the moment, but the first independent recorded levels are taken at the MOT