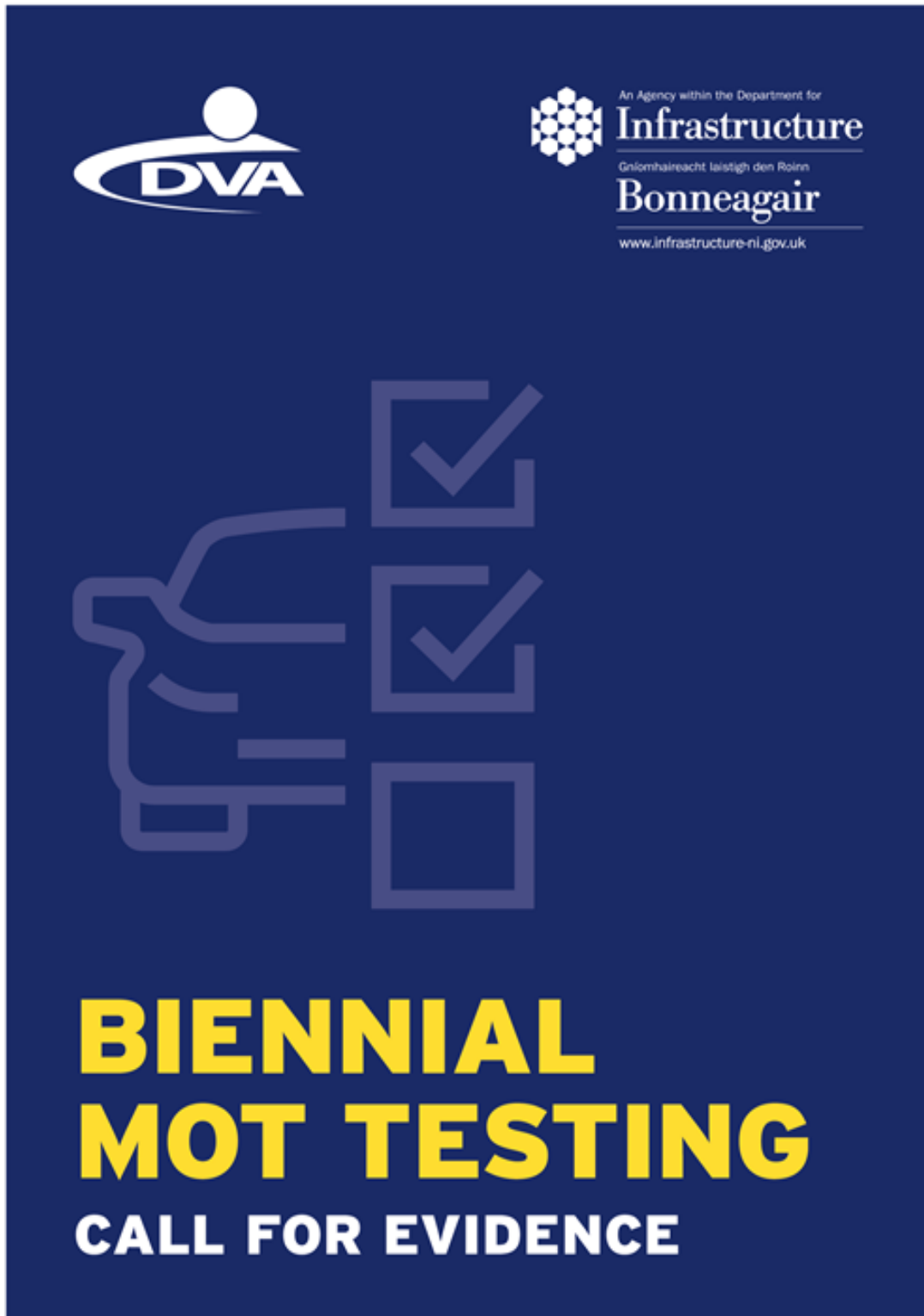


# SYNOPSIS OF RESPONSES



The cover features the DVA logo on the left and the Infrastructure and Bonneagair logos on the right. The central graphic shows a stylized car with three checkboxes to its right, the top two of which are checked. The main title 'BIENNIAL MOT TESTING' is in large yellow letters, with 'CALL FOR EVIDENCE' in white below it.

**DVA**

An Agency within the Department for  
**Infrastructure**  
Gníomhaireacht Ialstigh den Roinn  
**Bonneagair**  
[www.infrastructure-ni.gov.uk](http://www.infrastructure-ni.gov.uk)

**BIENNIAL  
MOT TESTING**  
**CALL FOR EVIDENCE**

February 2022

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# EXECUTIVE SUMMARY

## Responses

There were a total of 1,224 responses to the Call for Evidence exercise which have been broken down into the following respondent categories for the purposes of analysis.

- Individuals (1,162 responses)
- Automotive Industry (53 responses)
- Motoring Organisations / Groups (4 responses)
- Other Organisations / Groups (5 responses)

A profile of the respondents by category is provided at page 10.

## Context

The weight of numbers of the responses received from individuals means that their opinions are most prominent in influencing the overall results. It is a significant feature of the responses that at a macro level the responses from the automotive and vehicle maintenance industry are contrary to those received from individuals. It should also be borne in mind that although there is a large disparity between the numbers of individual responses received (1,162) and the number of other responses received (62), those other responses, given that they are generally from representative bodies, have a significance beyond the small number of responses themselves. In general terms, the Motoring Organisations tend to agree with the responses from Individual respondents, while most of the other organisations (PSNI<sup>1</sup>, NIPSA<sup>2</sup>, ABI<sup>3</sup> and BIBA<sup>4</sup>) tend to agree with the responses from the automotive industry.

## Overall Results

### **Biennial MOT Testing – Potential Introduction**

Although the Call for Evidence asked for responses to a number of questions, question 1 is the central and most significant question and the one from which the others flow. i.e.

*Do you believe that vehicle testing by DVA of private cars, light goods vehicles under 3,500kg and/or motorcycles should be conducted on a biennial basis (every 2 years)?*

In overall terms the outcome was clear for private cars and motorcycles with some 80% and 77% respectively of respondents believing that MOT testing for those vehicle categories should be done on a biennial basis. In terms of light goods vehicles, there was a very slight majority, with just over 50% believing that vehicle category should be MOT tested on a biennial basis.

In terms of the breakdown of responses, 85%, 54% and 82% of Individual respondents were respectively in favour of introducing biennial testing for private cars, light goods vehicles and motorcycles. While 89%, 92% and 79% of Automotive Industry respondents were respectively against its introduction. The Motoring Groups (4) were all in favour of biennial

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<sup>1</sup> Police Service of Northern Ireland (PSNI)

<sup>2</sup> Northern Ireland Public Service Alliance (NIPSA)

<sup>3</sup> Association of British Insurers (ABI)

<sup>4</sup> British Insurance Brokers Association (BIBA)

testing for cars but only half were in favour of its introduction for light goods vehicles and motorbikes. The PSNI, NIPSA, ABI and BIBA were all against the introduction of biennial testing for any of the vehicle categories. Both insurance bodies believed that the introduction of biennial testing would most likely lead to increased insurance premiums here.

### **Extending to Vehicles Over 10 Years Old**

In terms of whether biennial testing, if introduced, should extend to vehicles over 10 years old, the response to question 3 indicates a quite mixed overall response. Majorities of 56% and 54% for private cars and motorcycles respectively thought it should be extended, while a majority (57%) were against extending for light goods vehicles.

Again, the breakdown of responses is informative. Some 58%, 43% and 57% of Individual respondents were in favour of extending biennial testing to private cars, light goods vehicles and motorcycles respectively. While 88% of Automotive Industry respondents were against extending for private cars and motorcycles, with 90% against for light goods vehicles. The Motoring Groups favoured (3 out of 4) extending for private cars but were equally split when it came to light goods vehicles and motorcycles. The PSNI, NIPSA, ABI and BIBA were all against extending.

### **Impact on Road Safety**

In responding to question 4, a significant majority of 76% believe that introducing biennial testing for the subject vehicle categories will have no impact on road safety.

Some 80% of Individuals were of that opinion as were all of the Motoring Group respondents. Some respondents stated that there would be no significant impact on road safety based on the PSNI statistic that less than 2% of injuries and collisions are due to vehicle defects. However others noted a health warning in relation to this statistic as it only relates to vehicles involved in serious road traffic collisions (RTCs) where the vehicle has subsequently been forensically examined. Conversely, 88% of the Automotive Industry respondents, the PSNI, NIPSA, AIB and BIBA all believe that there would be a significant adverse impact on road safety if biennial testing was introduced which would result in an increase in RTCs and casualties.

### **Economic Impact**

Responses to question 5 indicate that in overall terms a significant majority of 75% believe that introducing biennial testing would not have an adverse economic impact on the automotive and vehicle maintenance industry and those specifically involved in MOT preparation.

This overall total is driven by the 79% of Individual responses that held that view. The Motoring Groups also were of that opinion. Some 88% of Automotive Industry respondents believed that introducing biennial testing would have an adverse and significant economic impact on them. Other groups including the PSNI and NIPSA also agreed that there would be an adverse economic impact.

## **Environmental Impact**

In overall terms, responses to question 6 indicate that a significant majority of 80% do not believe that the introduction of biennial testing would have an adverse environmental impact, including an impact on the health and well-being of the public.

Some 84% of Individual respondents and all the Motoring Groups were of that opinion. The Automotive Industry again took a contrary view with 80% of respondents believing that there would be an adverse environmental impact, including an impact on the health and well-being of the public. The PSNI, NIPSA, AIB and BIBA agreed.

## **Other Impacts**

Asked, via question 8, if there would be other impacts arising from a move to biennial testing for the in scope vehicle categories, a significant majority of 78% believed that there would not be.

In terms of Individual responses, 82% saw no other impacts. On the other hand, 78% of the Automotive Industry respondents believed there would be other impacts, as did one of the Motoring Groups and some of the Other Groups including the PSNI and NIPSA. The Annex provides a summary of the other impacts suggested. In short, PSNI were concerned that biennial testing will lead to more defective cars on the roads which will put pressure on already stretched police resources and also DVA enforcement resources. NIPSA's concern was the potential for an increase in collisions and accidents due to the increase in defective vehicles. They point out that the defect causation statistics only cover vehicles that have been involved in a serious collision and that have been forensically examined post collision. One respondent thought reverting to annual testing at 10 years old may help the uptake of electric vehicles. One of the Motoring Groups believed there would be an economic benefit for drivers. A few of the Automotive Industry respondents predicted a drop in confidence in local second hand car market. Buyers may favour GB cars that have been more recently MOT tested.

## **First Mandatory Tests**

Question 2 asked if biennial testing was to be introduced, should the first mandatory vehicle test remain at 4 years for private cars and motorcycles and 3 years for light goods vehicles. In overall terms, significant majorities of 85% of respondents agreed that for each of the in scope vehicle categories, the timing of first tests should remain as currently established.

Some 87%, 89% and 88% of Individuals who responded for each vehicle category respectively, agreed that the timing of first tests should not be altered. As did 59%, 71% and 64% of Automotive Industry respondents in relation to private cars, light goods vehicles and motorcycles respectively. The Motoring Groups (3 out of 4) also favoured not changing first test dates as did the Other Groups, including the PSNI and NIPSA. ABI and BIBA did not comment. This is the only question on which all of the respondent categories agreed.

## **Diesel Smoke Emissions Testing**

The frequency of the diesel smoke emissions testing of private cars and light goods vehicles was queried by question 7. In overall terms, a majority of 69% were in favour of diesel smoke emission testing being done on a biennial basis.

Individual respondents favoured this approach with a 72% positive response. Motoring Groups were also in favour. Industry respondents again took a contrary view with 78% indicating that diesel smoke emissions testing should be done annually. PSNI and NIPSA were also against doing such tests biennially.

### **General Comments**

Respondents were asked if they had any other comments to make and the general comments provided are summarised in the Annex.

In general, these comments covered areas such as a perceived need for additional driver education and enforcement if biennial testing was to be introduced, further concerns about the impact on road safety, the view that testing should be done on a mileage basis rather than age, the introduction of a formal annual servicing verification approach and, although not in scope of this exercise, various calls for Government to consider the use of private garages for MOT and/or emissions testing.

### **Next Steps**

This synopsis of responses will be considered by Minister Mallon and will inform any action she decides to take, which may include development of policy and further engagement with the public and relevant organisations.

Ultimately, the introduction of biennial testing, should the Minister consider it appropriate, would require the amendment of primary legislation. However, due to timing, it is not possible to make legislative change within this mandate. Any change to the current position will therefore be a matter for consideration in the next Assembly mandate.

## BACKGROUND

In Northern Ireland (NI) the current roadworthiness test, more commonly referred to as the “MOT test”, is a devolved matter and is the responsibility of the Minister for Infrastructure. The key Northern Ireland legislation which governs this is Part 3 of the Road Traffic (Northern Ireland) Order 1995, the Motor Vehicle Testing Regulations (NI) 2003, the Goods Vehicles (Testing) Regulations (NI) 2003 and the Motor Vehicles (Construction and Use) Regulations (NI) 1999. This legislation remains in force following the decision to leave the European Union on 31 December 2020.

Testing of all vehicles which use the public roads in NI is the responsibility of the Driver and Vehicle Agency (DVA) through vehicle inspection at its 15 test centres. Currently private cars and motorcycles are first MOT tested at 4 years old and light goods vehicles under 3,500kg are first tested at 3 years old. Each of those vehicle categories are tested annually thereafter.

The Minister has previously indicated that she wishes to review the current testing regimes for some vehicle categories to ensure they remain fit for purpose, both now and in the future. The need to undertake this review has been brought into sharper focus following the impact of the Covid-19 pandemic on the testing process for private cars, light goods vehicles and motorcycles, which followed shortly after the failure of a number of scissor lifts at DVA vehicle test centres. These factors led to the suspension and curtailment of testing arrangements and the use of Temporary Exemption Certificates (TECs) to ensure that all eligible vehicles may continue to be driven legally on the road.

Consequently, on 25<sup>th</sup> August 2021, Minister Mallon issued a Call for Evidence (CfE) which sought views on the option to introduce biennial testing (every two years) for private cars, light goods vehicles under 3,500kg and motorcycles, as compared to the current annual testing arrangements. She also sought views on whether, if biennial testing were to be introduced, the first test for light goods vehicles should move from 3 years old to 4 years old, i.e. making their first test due at the same age as for private cars and motorcycles.

The CfE was issued for an 8 week period which closed on 19<sup>th</sup> October 2021. Minister Mallon was particularly keen to hear from individuals, groups, organisations, the automotive industry (particularly those involved in MOT preparation) and those with a specific interest in road safety or the environment. The CfE was uploaded to the Citizen Space platform to allow for online responses. E-mail and paper responses were also facilitated. The vast majority of respondents used the Citizen Space platform to make their response and the relatively few responses that were received via email were also uploaded to the platform to allow ease of statistical reporting.

A total of 1,224 responses were received from a range of individuals, groups, and industry representatives. This document provides a synopsis of those responses.

## WHY UNDERTAKE A CALL FOR EVIDENCE

A decision to implement biennial testing would require amendment of primary legislation. Since vehicle testing is a devolved matter, this would entail an Act of the NI Assembly. Given the significance of potentially moving from annual vehicle testing to biennial testing, the Minister decided that an evidence gathering exercise should be undertaken to help inform the way ahead.

### Key Issues

The key issues that the Call for Evidence asked respondents to consider were the potential impact of introducing biennial testing for private cars, light goods vehicles and motorcycles on:

- a) the automotive industry here, specifically those involved in MOT preparation and vehicle servicing;
- b) road safety;
- c) the environment;
- d) our comparison with other jurisdictions; and
- e) DVA operational arrangements.

### Key Questions

Whilst the Department welcomed comments on all aspects of vehicle testing, eight key questions were posed as follows:

1. Do you believe that vehicle testing by DVA of private cars, light goods vehicles under 3,500kg and/or motorcycles should be conducted on a biennial basis (every 2 years)?
2. If biennial vehicle testing were to be introduced in Northern Ireland for private cars, light goods vehicles under 3,500kg, and/or motorcycles, should the first mandatory vehicle test remain at 4 years for private cars and motorcycles and 3 years for light goods vehicles? If no, at what point do you believe that a first mandatory vehicle test should be conducted?
3. If biennial testing is introduced for private cars, light goods vehicles under 3,500kg, and/or motorcycles should this be extended to vehicles over 10 years old? If no, at what point do you believe that biennial testing should be stopped and annual testing commenced?
4. Do you believe moving to biennial vehicle testing for private cars, light goods vehicles under 3,500kg and/or motorcycles would have any impact on road safety?
5. Do you believe moving to biennial vehicle testing for private cars, light goods vehicles under 3,500kg and/or motorcycles would have an adverse economic impact on the automotive and vehicle maintenance industry and those specifically involved in MOT preparation?
6. Do you believe moving to biennial vehicle testing for private cars, light goods vehicles under 3,500kg and/or motorcycles would have an adverse environmental impact, including an impact on the health and well-being of the public?
7. Do you believe the frequency in NI of the diesel smoke emissions testing of private cars and light goods vehicles should be biennial?
8. Do you believe that there would be other impacts arising from a move to biennial vehicle testing for private cars, light goods vehicles under 3,500kg and/or motorcycles?



## PROFILE OF RESPONDENTS

There were 1,224 responses to the Call for Evidence which were broken down into the following respondent categories for the purposes of analysis.

### Individuals (1,162 responses)

Responses made by individual members of the general public.

### Automotive Industry (53 responses)

Responses made by people or groups who identified as working in the automotive industry. Although a total of 53 responses were made it should be recognised that six of those responses were from industry umbrella organisations representing hundreds of individual members. Those organisations were as follows:

- National Franchised dealers Association (NFDA)
- Society of Motor Manufacturers and Traders (SMMT)
- Independent Garage Association (IGA)
- Independent Automotive Aftermarket Federation (IAAF)
- National Tyres Distributors Association (NTDA)
- United Kingdom Lubricants Association (UKLA)

### Motoring Organisations/Groups (4 responses)

Responses made from people identifying as representing the following motoring organisations/groups:

- Motorcycle Action Group UK (MAG)
- Total Motorhome Ireland
- EV Cars NI
- Car Culture NI

### Other Organisations / Groups (5 responses)

Responses made by organisations / groups that do not fall into the above categories. The ABI and BIBA are insurance umbrella associations that represent hundreds of individual members.

- Alliance Party of Northern Ireland
- Association of British Insurers (ABI)
- British Insurance Brokers Association (BIBA)
- Police Service of Northern Ireland (PSNI)
- Northern Ireland Public Service Alliance (NIPSA)

## PROFILE OF RESPONSES

Of the 1,224 responses received, 1,162 (94.9%) were from Individuals, 53 (4.3%) were from representatives of the Automotive Industry (people or groups who identified as working in or with the automotive industry), 4 were from Motoring Organisations/Groups and 5 were from Other Organisations / Groups.

For each question, the sections below provide statistical tables and some explanation covering the overall response position and also a breakdown by respondent category. Notwithstanding the overall results, consideration must also be given to the breakdown of answers by respondent if the findings of the exercise are to be fully appreciated and understood.

Accordingly, as well as showing the percentage of “Yes” and “No” answers given in overall terms, additional tables show the percentage of “Yes” and “No” answers given by each respondent category.

The main reasons given by respondents for their answers are also commented on below. However further detail on the reasons given can be found in the Annex.

## QUESTION 1

### Do you believe that vehicle testing by DVA of private cars, light goods vehicles under 3,500kg and/or motorcycles should be conducted on a biennial basis (every 2 years)?

Although the Call for Evidence asked a number of questions, question 1 is the central and most significant question and the one from which the others flow. The question itself allowed separate answers for each of the vehicle categories mentioned. As well as looking at the overall response, this analysis will therefore also look at the answers for each vehicle category separately.

## OVERALL RESPONSE

In overall terms the outcome was clear for private cars and motorcycles with some 80% and 77% respectively of respondents believing that MOT testing for those vehicle categories should be done on a biennial basis. In terms of light goods vehicles, there was a very slight majority, with just over 50% believing that that vehicle category should be MOT tested on a biennial basis.

It should be borne in mind that the answer to this question needs to be considered in conjunction with the answer to question 3 which relates to whether biennial testing, if introduced, should be extended to vehicles over 10 Years old.

PRIVATE CARS	Total	Percent
Yes	985	80.47%
No	228	18.63%
Sub-Total	1,213	
Didn't Answer / No Opinion Expressed	11	0.90%

LIGHT GOODS VEHICLES (LGVs) < 3,500 kg	Total	Percent
Yes	617	50.41%
No	579	47.30%
Sub-Total	1,196	
Didn't Answer / No Opinion Expressed	28	2.29%

MOTORCYCLES	Total	Percent
Yes	945	77.21%
No	251	20.51%
Sub-Total	1,196	
Didn't Answer / No Opinion Expressed	28	2.29%

## RESPONSES BY RESPONDENT CATEGORY

### Individuals

Some 85%, 54% and 82% of Individual respondents were in favour of introducing biennial testing for private cars, light goods vehicles and motorcycles respectively. Over 75% of those Individuals did not provide a reason for this support. Circa 5% said that their response was on the basis that annual servicing / maintenance of vehicles would continue because most drivers were conscientious or, in terms of younger vehicles, annual servicing was required under warranty / contract obligations. The other main reasons given were that modern vehicles are better constructed and safer, biennial testing was needed to address backlog/capacity issues and that biennial testing was the common approach across Europe. The main concern expressed by individuals who responded "No" was that vehicle owners could not be trusted to continue to have their vehicles annually serviced and maintained without the compulsion of an annual MOT.

## Automotive Industry

The Automotive Industry was overwhelmingly against the introduction of biennial testing for private cars, light goods vehicles and motorcycles with 89%, 92% and 79% against for each vehicle category respectively. Over 70% of those respondents who were against, across each of the vehicle categories, believed that owners would not continue to have their vehicles serviced / maintained annually without the trigger of an annual MOT. They felt that this would result in a significant increase in cars on the roads with defects which will lead to more RTCs and more casualties / fatalities. The other most common reason provided was that testing needed to be annual since a lot can go wrong with a vehicle in a year.

## Motoring Organisations/Groups

The Motoring Organisations that responded were all in favour of biennial testing for private cars largely for the same reasons expressed as Individuals. They were though evenly split on whether it should be introduced for light goods vehicles and motorcycles. The two against for light goods vehicles provided no reason for their view. In terms of motorcycles, one respondent deemed them higher risk and the other provided no reason for being against.

## Other Organisations/Groups

The PSNI were strongly against the introduction of biennial testing noting that over the last 3 years, the number of vehicles detected breaching Construction & Use regulations has increased year on year from 1,914 (Aug 2018 - July 2019) to 3,090 (Aug 2020 - July 2021).

They also state that: *“Experience would indicate that the economics of commercial vehicle maintenance is that owners will seek to save money where possible. The number of first-time test failures would support the hypothesis that the DVA is regarded as a cheap diagnostic service. With re-test rates currently running at around 20% when vehicles are subject to annual tests, what might this rise to with biennial testing?”*

NIPSA were also strongly against, stating that reducing the frequency of testing would erode road safety and public confidence.

The Association of British Insurers (ABI) and the British Insurance Brokers Association (BIBA), and their members, strongly disagreed with the introduction of biennial testing. ABI believes that more sporadic technical inspections for vehicles would increase the risk of poorly maintained vehicles on the roads which could ultimately have a negative impact on road safety that may need to be reflected in premium pricing. While BIBA believes that many people only service their vehicles when the MOT is due and often wait to see what it fails on first. They also anticipated that a change to biennial testing would result in an increased accident frequency risk and ultimately higher premiums in NI.

Based on research undertaken, another respondent believed there was a case for moving to the 4 + 2 + 1 model but suggested that it should be piloted amongst a portion of vehicles. If successful the pilot should be widened out across Northern Ireland alongside a further pilot of the 4 + 2 + 2 model in order to build a strong evidence base for change that will engender public confidence for a move to 4 + 2 + 1 and then 4 + 2 + 2.

<b>PRIVATE CARS</b>		<b>Total</b>	<b>% Category Total</b>	<b>% Overall Total</b>
<b>YES</b>	INDIVIDUALS	974	84.62%	
	AUTOMOTIVE INDUSTRY	6	11.32%	
	MOTORING GROUPS	4	100%	
	OTHER ORGANISATIONS/GROUPS	1	20%	
	Sub-total "YES"	985		80.47%
<b>NO</b>	INDIVIDUALS	177	15.38%	
	AUTOMOTIVE INDUSTRY	47	88.68%	
	MOTORING GROUPS	0	0%	
	OTHER ORGANISATIONS/GROUPS	4	80%	
	Sub-total "NO"	228		18.63%
Sub-total Answered		1,213		
Didn't Answer / No Opinion Expressed		11		0.90%

<b>LIGHT GOODS VEHICLES</b>		<b>Total</b>	<b>% Category Total</b>	<b>% Overall Total</b>
<b>YES</b>	INDIVIDUALS	610	53.79%	
	AUTOMOTIVE INDUSTRY	4	7.55%	
	MOTORING GROUPS	2	50%	
	OTHER ORGANISATIONS/GROUPS	1	20%	
	Sub-total "YES"	617		50.41%
<b>NO</b>	INDIVIDUALS	524	46.21%	
	AUTOMOTIVE INDUSTRY	49	92.45%	
	MOTORING GROUPS	2	50%	
	OTHER ORGANISATIONS/GROUPS	4	80%	
	Sub-total "NO"	579		47.30%
Sub-total Answered		1,196		
Didn't Answer / No Opinion Expressed		28		2.29%

<b>MOTORCYCLES</b>		<b>Total</b>	<b>% Category Total</b>	<b>% Overall Total</b>
<b>YES</b>	INDIVIDUALS	931	82.03%	
	AUTOMOTIVE INDUSTRY	11	21.15%	
	MOTORING GROUPS	2	50%	
	OTHER ORGANISATIONS/GROUPS	1	20%	
	Sub-total "YES"	945		77.21%
<b>NO</b>	INDIVIDUALS	204	17.97%	
	AUTOMOTIVE INDUSTRY	41	78.85%	
	MOTORING GROUPS	2	50%	
	OTHER ORGANISATIONS/GROUPS	4	80%	
	Sub-total "NO"	251		20.51%
Sub-total Answered		1,196		
Didn't Answer / No Opinion Expressed		28		2.29%

## QUESTION 2

If biennial vehicle testing were to be introduced in Northern Ireland for private cars, light goods vehicles under 3,500kg, and/or motorcycles should the first mandatory vehicle test remain at 4 years for private cars and motorcycles and 3 years for light goods vehicles?

### OVERALL RESPONSE

In overall terms, the outcome is clear for all vehicle categories. Some 85% of respondents agreed that the timing of first mandatory vehicle tests for private cars, light goods vehicles and motorcycles should remain as currently scheduled if biennial testing was introduced.

PRIVATE CARS	Total	Percent
Yes	1,036	84.64%
No	171	13.97%
<b>Sub-total</b>	1,207	
Didn't Answer / No Opinion Expressed	17	1.39%

LIGHT GOODS VEHICLES (LGVs) < 3,500 kg	Total	Percent
Yes	1,046	85.46%
No	145	11.85%
<b>Sub-total</b>	1,191	
Didn't Answer / No Opinion Expressed	33	2.70%

MOTORCYCLES	Total	Percent
Yes	1,035	84.56%
No	158	12.91%
<b>Sub-total</b>	1,193	
Didn't Answer / No Opinion Expressed	31	2.53%

### RESPONSES BY RESPONDENT CATEGORY

#### Individuals

Some 87%, 89% and 88% of Individual respondents for each vehicle category respectively agreed that the timing of first tests should not be altered. No reasons were provided to support this view. Those who were in favour of a change had very different reasons with some suggesting that first tests should be later based on the improved quality and safety of modern vehicles evidenced by 5 to 7 year manufacturer warranties. While others though first tests should be earlier because significant issues can arise with younger as well as older vehicles.

#### Automotive Industry

Circa 59%, 71% and 64% of Automotive Industry respondents for each vehicle category respectively, agreed that no change should be made. No reasons were provided to support this view and those who disagreed did so for similar reasons to the Individual respondents.

#### Motoring Organisations / Groups

Motoring Groups (3 out of 4) were content not to change first test dates. Again no reasoning specifically provided.

#### Other Organisations / Groups

Those that expressed a view were also content to leave first test dates unchanged.

<b>PRIVATE CARS</b>		<b>Total</b>	<b>% Category Total</b>	<b>% Overall Total</b>
<b>YES</b>	INDIVIDUALS	999	86.95%	
	AUTOMOTIVE INDUSTRY	30	58.82%	
	MOTORING GROUPS	4	100%	
	OTHER ORGANISATIONS/GROUPS	3	100%	
	Sub-total "YES"	1,036		84.64%
<b>NO</b>	INDIVIDUALS	150	13.05%	
	AUTOMOTIVE INDUSTRY	21	41.18%	
	MOTORING GROUPS	0	0%	
	OTHER ORGANISATIONS/GROUPS	0	0%	
	Sub-total "NO"	171		13.97%
Sub-total Answered		1,207		
Didn't Answer / No Opinion Expressed		17		1.39%

<b>LIGHT GOODS VEHICLES</b>		<b>Total</b>	<b>% Category Total</b>	<b>% Overall Total</b>
<b>YES</b>	INDIVIDUALS	1004	88.61%	
	AUTOMOTIVE INDUSTRY	36	70.59%	
	MOTORING GROUPS	3	75%	
	OTHER ORGANISATIONS/GROUPS	3	100%	
	Sub-total "YES"	1046		85.46%
<b>NO</b>	INDIVIDUALS	129	11.39%	
	AUTOMOTIVE INDUSTRY	15	29.41%	
	MOTORING GROUPS	1	25%	
	OTHER ORGANISATIONS/GROUPS	0	0%	
	Sub-total "NO"	145		11.85%
Sub-total Answered		1,191		
Didn't Answer / No Opinion Expressed		33		2.70%

<b>MOTORCYCLES</b>		<b>Total</b>	<b>% Category Total</b>	<b>% Overall Total</b>
<b>YES</b>	INDIVIDUALS	997	87.76%	
	AUTOMOTIVE INDUSTRY	32	64.00%	
	MOTORING GROUPS	3	75%	
	OTHER ORGANISATIONS/GROUPS	3	100%	
	Sub-total "YES"	1035		84.56%
<b>NO</b>	INDIVIDUALS	139	12.24%	
	AUTOMOTIVE INDUSTRY	18	36.00%	
	MOTORING GROUPS	1	25%	
	OTHER ORGANISATIONS/GROUPS	0	100%	
	Sub-total "NO"	158		12.91%
Sub-total Answered		1,193		
Didn't Answer / No Opinion Expressed		31		2.53%

### QUESTION 3

**If biennial testing is introduced for private cars, light goods vehicles under 3,500kg, and/or motorcycles should this be extended to vehicles over 10 years old?**

#### **OVERALL RESPONSE**

In overall terms the outcome is quite mixed and there is no significant majority for either of the options for any of the vehicle categories. Nevertheless, majorities of 56% and 54% for private cars and motorcycles respectively thought that if biennial testing was introduced it should be extended to vehicles over 10 years old. For light goods vehicles, a majority (57%) were against extending biennial testing to vehicles over 10 years old.

<b>PRIVATE CARS</b>	<b>Total</b>	<b>Percent</b>
Yes	683	55.80%
No	531	43.38%
<b>Sub-total</b>	1,214	
Didn't Answer / No Opinion Expressed	10	0.82%

<b>LIGHT GOODS VEHICLES (LGVs) &lt; 3,500 kg</b>	<b>Total</b>	<b>Percent</b>
Yes	500	40.85%
No	703	57.43%
<b>Sub-total</b>	1,203	
Didn't Answer / No Opinion Expressed	21	1.72%

<b>MOTORCYCLES</b>	<b>Total</b>	<b>Percent</b>
Yes	660	53.92%
No	536	43.79%
<b>Sub-total</b>	1,196	
Didn't Answer / No Opinion Expressed	28	2.29%

### **RESPONSES BY RESPONDENT CATEGORY**

#### **Individuals**

Some 58% and 57% of respondents on private cars and motorcycles respectively, wanted biennial testing extended to vehicles that were over 10 years old, although the vast majority did not comment on the reason for that. Those who did not favour extension to vehicles in those categories over 10 years old commented for the most part that vehicles should be tested from 10 years old although some mentioned the greater deterioration of older vehicles and the likelihood that many would not continue to have their vehicles serviced annually beyond warranty periods. The 57% majority that did not want biennial testing extended for light goods vehicles did so because such vehicles were considered to do more miles and suffer more abuse than private cars and motorcycles.

#### **Automotive Industry**

The Automotive Industry was not in favour of extending biennial testing, if introduced, to vehicles over 10 years old, with 88%, 90% and 88% saying "No" in relation to private cars, light goods vehicles and motorcycles respectively. This was predominantly for the reason that they did not believe biennial testing should be introduced at any age for any vehicle category.



## Motoring Organisations / Groups

Motoring Groups were split on this issue, with 3 out of 4 favouring the extension of biennial testing to private cars. However for light goods vehicles and motorcycles there was a 50/50 split. No specific reasons were provided.

## Other Organisations / Groups

The Other Organisations were all against the extension of biennial testing to vehicles over 10 years old and were therefore content to leave first test dates unchanged.

PRIVATE CARS		Total	% Category Total	% Overall Total
YES	INDIVIDUALS	674	58.46%	
	AUTOMOTIVE INDUSTRY	6	11.54%	
	MOTORING GROUPS	3	75%	
	OTHER ORGANISATIONS/GROUPS	0	0%	
	Sub-total "YES"	683		55.80%
NO	INDIVIDUALS	479	41.54%	
	AUTOMOTIVE INDUSTRY	46	88.46%	
	MOTORING GROUPS	1	25%	
	OTHER ORGANISATIONS/GROUPS	5	100%	
	Sub-total "NO"	531		43.38%
Sub-total Answered		1,214		
Didn't Answer / No Opinion Expressed		10		0.82%

LIGHT GOODS VEHICLES		Total	% Category Total	% Overall Total
YES	INDIVIDUALS	493	43.17%	
	AUTOMOTIVE INDUSTRY	5	9.62%	
	MOTORING GROUPS	2	50%	
	OTHER ORGANISATIONS/GROUPS	0	0%	
	Sub-total "YES"	500		40.85%
NO	INDIVIDUALS	649	56.83%	
	AUTOMOTIVE INDUSTRY	47	90.38%	
	MOTORING GROUPS	2	50%	
	OTHER ORGANISATIONS/GROUPS	5	100%	
	Sub-total "NO"	703		57.43%
Sub-total Answered		1,203		
Didn't Answer / No Opinion Expressed		21		1.72%

<b>MOTORCYCLES</b>		<b>Total</b>	<b>% Category Total</b>	<b>% Overall Total</b>
<b>YES</b>	INDIVIDUALS	652	57.39%	
	AUTOMOTIVE INDUSTRY	6	11.76%	
	MOTORING GROUPS	2	50%	
	OTHER ORGANISATIONS/GROUPS	0	0%	
	Sub-total "YES"	660		53.92%
<b>NO</b>	INDIVIDUALS	484	42.61%	
	AUTOMOTIVE INDUSTRY	45	88.24%	
	MOTORING GROUPS	2	50%	
	OTHER ORGANISATIONS/GROUPS	5	100%	
	Sub-total "NO"	536		43.79%
Sub-total Answered		1,196		
Didn't Answer / No Opinion Expressed		28		2.29%

## QUESTION 4

**Do you believe moving to biennial vehicle testing for private cars, light goods vehicles under 3,500kg and/or motorcycles would have any impact on road safety?**

### OVERALL RESPONSE

In overall terms the outcome shows that a significant majority (76%) believe that moving to biennial testing for private cars, light goods vehicles and motorcycles would not have any impact on road safety.

Option	Total	Percent
Yes	277	22.63%
No	935	76.39%
Didn't Answer / No Opinion Expressed	12	0.98%

### RESPONSES BY RESPONDENT CATEGORY

#### Individuals

Some 80% of individuals did not believe that introducing biennial testing would have an impact on road safety. For the most part, no reasons were given to support this view. Of the 20% who thought there would be an impact, the biggest reason provided was that owners are not trusted to continue to take their vehicle for annual servicing / maintenance by garages/dealers without the trigger of an annual MOT.

#### Automotive Industry

The Automotive Industry were clear (88%) that there would be an impact on road safety, again because owners are not trusted to continue to take their vehicle for annual servicing / maintenance by garages/dealers without the trigger of an annual MOT. This would result in a significant increase in cars on the roads with defects which will lead to more RTCs and more casualties /fatalities. Half of those who indicated that there would be no impact, did so on the basis that owners would continue to maintain and service their vehicles annually.

#### Motoring Organisations/Groups

All of the 4 Motoring Groups did not believe that there would be an impact on road safety. This was mainly based on the statistics that only a small number of deaths and serious injuries are caused by vehicle defects. Although their view was to some extent dependant on annual servicing / maintenance being continued by vehicle owners.

#### Other Organisations/Groups

The PSNI, NIPSA, AIB and BIBA all thought that there would be a significant impact on road safety if biennial testing were introduced.

The PSNI stated that *“Recent police observations are that a greater proportion of vehicles that we have encountered during the last 18 months have been carrying defects. Many more tyres worn to extreme levels than would have been common pre-pandemic. The views of mechanics, tyre fitters and auto-spares suppliers would seem to support the view that many drivers are postponing servicing and purchase of replacement parts. Police cannot conceive that a move to biennial testing could be regarded as anything but a dilution of vehicle safety standards.”*

NIPSA commented that: *“The economic climate in NI over previous years has shown how people only spend on things that are needed at that point. Experience in test centres would indicate that new components etc. are fitted within days of the test, vehicles that fail show signs indicating that failed components have been in that condition for some time and vehicle has still been used on the road.”*

BIBA stated that “The two-year proposal is a backward step which could result in more accidents, worse carbon emissions, more injuries and higher premiums.”

ABI made a similar comment “We believe that more sporadic technical inspections for vehicles would increase the risk of poorly maintained vehicles on the roads. This could ultimately have a negative impact on road safety and the uncertainty posed by biennial testing may need to be reflected in premium pricing.”

IMPACT ON ROAD SAFETY		Total	% Category Total	% Overall Total
YES	INDIVIDUALS	227	19.72%	
	AUTOMOTIVE INDUSTRY	46	88.46%	
	MOTORING GROUPS	0	0%	
	OTHER ORGANISATIONS/GROUPS	4	80%	
	Sub-total “YES”	277		22.63%
NO	INDIVIDUALS	924	80.28%	
	AUTOMOTIVE INDUSTRY	6	11.54%	
	MOTORING GROUPS	4	100%	
	OTHER ORGANISATIONS/GROUPS	1	20%	
	Sub-total “NO”	935		76.39%
Sub-total Answered		1,212		
Didn’t Answer / No Opinion Expressed		12		0.98%

## **QUESTION 5**

**Do you believe moving to biennial vehicle testing for private cars, light goods vehicles under 3,500kg and/or motorcycles would have an adverse economic impact on the automotive and vehicle maintenance industry and those specifically involved in MOT preparation?**

### **OVERALL RESPONSE**

In overall terms, the outcome shows that a significant majority (75%) believe that moving to biennial testing for private cars, light goods vehicles and motorcycles would not have an adverse economic impact on the automotive and vehicle maintenance industry.

<b>Option</b>	<b>Total</b>	<b>Percent</b>
<b>Yes</b>	286	23.37%
<b>No</b>	921	75.25%
<b>Didn't Answer / No Opinion Expressed</b>	17	1.39%

### **RESPONSES BY RESPONDENT CATEGORY**

#### **Individuals**

A large majority of Individual respondents (79%) did not believe that introducing biennial testing would have an adverse economic impact on the automotive and vehicle maintenance industry and those specifically involved in MOT preparation. No reasons were offered by a similar percentage of "No" respondents for that opinion. Of the 20% who thought there would be an impact, the biggest reason provided was in relation to owners not continuing to take their vehicle for annual servicing/ maintenance in the years when no MOT was due.

#### **Automotive Industry**

Some 88% of Automotive Industry respondents believed that there would be an adverse economic impact due to vehicle owners not continuing to take their vehicle for annual servicing / maintenance in the years when no MOT was due. Those of a contrary view indicated it was on the basis that owners would continue to maintain and service their vehicles annually.

#### **Motoring Organisations/Groups**

None of the Motoring Groups foresaw an economic impact. One group suggested this would be because vehicles would still be serviced annually. Another thought that garages were always busy and if anything biennial testing would ease the pressure on them.

#### **Other Organisations/Groups**

The PSNI and NIPSA both anticipated an adverse economic impact on the automotive industry. The PSNI noted that anecdotal evidence suggested that there had been a huge drop-off in volumes of garage business when people realised they wouldn't have to present their vehicle for MOT. NIPSA were particularly concerned that there would be a significant impact on the future of small garages across NI. ABI and BIBA did not comment.

<b>ECONOMIC IMPACT</b>		<b>Total</b>	<b>% Category Total</b>	<b>% Overall Total</b>
<b>YES</b>	INDIVIDUALS	238	20.71%	
	AUTOMOTIVE INDUSTRY	45	88.24%	
	MOTORING GROUPS	0	0%	
	OTHER ORGANISATIONS/GROUPS	3	100%	
	Sub-total "YES"	286		23.37%
<b>NO</b>	INDIVIDUALS	911	79.29%	
	AUTOMOTIVE INDUSTRY	6	11.76%	
	MOTORING GROUPS	4	100%	
	OTHER ORGANISATIONS/GROUPS	0	0%	
	Sub-total "NO"	921		75.25%
Sub-total Answered		1,207		
Didn't Answer / No Opinion Expressed		17		1.39%

## QUESTION 6

**Do you believe moving to biennial vehicle testing for private cars, light goods vehicles under 3,500kg and/or motorcycles would have an adverse environmental impact, including an impact on the health and well-being of the public? Please answer yes or no.**

### OVERALL RESPONSE

In overall terms the outcome shows that a significant majority (80%) believe that moving to biennial testing for private cars, light goods vehicles and motorcycles would not have an adverse environmental impact.

Option	Total	Percent
Yes	228	18.63%
No	981	80.15%
Didn't Answer / No Opinion Expressed	15	1.23%

### RESPONSES BY RESPONDENT CATEGORY

#### Individuals

Another large majority of Individual respondents (84%) did not believe that introducing biennial testing would have an adverse environmental impact, including an impact on the health and well-being of the public. Over 90% of those replying "No" did not provide any reason for this opinion.

#### Automotive Industry

In contrast, a large majority (80%) of Automotive Industry respondents believed that there would be an adverse environmental impact. The main reason offered was that there would be more unroadworthy vehicles with unchecked / high emission and noise levels on the road, polluting the environment and putting the health and wellbeing of the public at risk.

#### Motoring Organisations/Groups

None of the Motoring Groups foresaw an environmental impact. Again one group suggested this would be because vehicles would still be serviced annually.

#### Other Organisations/Groups

The PSNI, NIPSA, ABI and BIBA all anticipated an adverse environmental impact if biennial testing were introduced. The ABI noted that MOTs include an assessment of exhausts and emissions and that a move towards biennial MOT testing could go against the Government's drive to decarbonise transport.

ENVIRONMENTAL IMPACT		Total	% Category Total	% Overall Total
YES	INDIVIDUALS	183	15.93%	
	AUTOMOTIVE INDUSTRY	41	80.39%	
	MOTORING GROUPS	0	0%	
	OTHER ORGANISATIONS/GROUPS	4	80%	
	Sub-total "YES"	228		18.63%
NO	INDIVIDUALS	966	84.07%	
	AUTOMOTIVE INDUSTRY	10	19.61%	
	MOTORING GROUPS	4	100%	
	OTHER ORGANISATIONS/GROUPS	1	20%	
	Sub-total "NO"	981		80.15%
Sub-total Answered		1,209		
Didn't Answer / No Opinion Expressed		15		1.23%

## QUESTION 7

**Do you believe the frequency in NI of the diesel smoke emissions testing of private cars and light goods vehicles should be biennial?**

### OVERALL RESPONSE

In overall terms the outcome shows that a majority (69%) are in favour of diesel smoke emissions testing being done biennially for private cars and light goods vehicles.

Option	Total	Percent
Yes	847	69.20%
No	358	29.25%
Didn't Answer / No Opinion Expressed	19	1.55%

### RESPONSES BY RESPONDENT CATEGORY

#### Individuals

Some 72% of Individual respondents were in favour of the diesel smoke emissions testing of private cars and light goods vehicles being done on a biennial basis. No reason for this opinion was provided by 92% of those respondents.

#### Automotive Industry

A significant majority (78%) of Automotive Industry respondents were not in favour of biennial diesel smoke emissions testing. The main reason given was that emissions testing must be done on an annual basis to avoid unchecked high emission levels / pollution.

#### Motoring Organisations/Groups

All the Motoring Groups who responded wanted diesel smoke emission to be done on a biennial basis. Two of the respondents didn't provide a reason for that view while the other believed it should be done at the same time as the MOT test itself, i.e. biennially.

#### Other Organisations/Groups

The PSNI and NIPSA were against biennial diesel smoke emissions testing. PSNI didn't think that annual diesel smoke emissions testing was currently being effective and that biennial testing would make things worse. NIPSA thought that annual emissions check were vital to protect the environment and health.

EMISSIONS TESTING FREQUENCY		Total	% Category Total	% Overall Total
YES	INDIVIDUALS	833	72.50%	
	AUTOMOTIVE INDUSTRY	11	21.57%	
	MOTORING GROUPS	3	100%	
	OTHER ORGANISATIONS/GROUPS	0	0%	
	Sub-total "YES"	847		69.20%
NO	INDIVIDUALS	316	27.50%	
	AUTOMOTIVE INDUSTRY	40	78.43%	
	MOTORING GROUPS	0	0%	
	OTHER ORGANISATIONS/GROUPS	2	100%	
	Sub-total "NO"	358		29.25%
Sub-total Answered		1,212		
Didn't Answer / No Opinion Expressed		19		1.55%



## QUESTION 8

**Do you believe that there would be other impacts arising from a move to biennial vehicle testing for private cars, light goods vehicles under 3,500kg and/or motorcycles?**

### OVERALL RESPONSE

The outcome shows that a significant majority (78%) do not believe that there would be any other impacts resulting from a move to biennial testing for private cars, light goods vehicles and motorcycles.

Option	Total	Percent
Yes	252	20.59%
No	952	77.78%
Didn't Answer / No Opinion Expressed	20	1.63%

### RESPONSES BY RESPONDENT CATEGORY

#### Individuals

Individual respondents (82%) did not think that there would be any other impacts arising from the introduction of biennial testing.

#### Automotive Industry

A significant majority (78%) of Automotive Industry respondents believed that there would be other impacts. These included, a drop in confidence in the local second hand car market with buyers potentially seeking GB cars that have been more recently tested, job losses in the industry and in DVA and a need for increased education and enforcement activity.

#### Motoring Organisations/Groups

Only one Motoring Group mentioned another impact, i.e. an economic benefit for drivers.

#### Other Organisations/Groups

Other potential impacts were raised, including resourcing implications for PSNI and DVA because of an increased need for enforcement.

OTHER IMPACTS		Total	% Category Total	% Overall Total
YES	INDIVIDUALS	208	18.15%	
	AUTOMOTIVE INDUSTRY	40	78.43%	
	MOTORING GROUPS	1	25%	
	OTHER ORGANISATIONS/GROUPS	3	100%	
	Sub-total "YES"	252		20.59%
NO	INDIVIDUALS	938	81.85%	
	AUTOMOTIVE INDUSTRY	11	21.57%	
	MOTORING GROUPS	3	75%	
	OTHER ORGANISATIONS/GROUPS	0	0%	
	Sub-total "NO"	952		77.78%
Sub-total Answered		1,204		
Didn't Answer / No Opinion Expressed		20		1.63%

## General Comments

In addition to their answers to the 8 questions posed, respondents made a number of other general comments a summary of which has been included in the Annex to this document.

## FURTHER DETAILS AND REASONS FOR RESPONSES

This Annex provides a general summary of the reasons for each question by respondent category.

### QUESTION 1

**Do you believe that vehicle testing by DVA of private cars, light goods vehicles under 3,500kg and/or motorcycles should be conducted on a biennial basis (every 2 years)?**

#### INDIVIDUALS

<b>REASONS FOR RESPONDING “YES” TO EACH ELEMENT OF QUESTION 1</b>	<b>CARS</b>	<b>LGVS</b>	<b>MOTOR CYCLES</b>
<b>No. of respondents</b>	<b>974</b>	<b>610</b>	<b>931</b>
No reason provided	78%	76%	78%
Yes - Dependant on annual servicing / maintenance by garages/dealers continuing to be undertaken, either because drivers would want to ensure the roadworthiness of their vehicle or because, for younger vehicles, annual servicing would be required under warranty/ contract obligations.	5%	5%	6%
Modern vehicles are better constructed and are safer.	5%	8%	8%
Biennial testing needed to address MOT backlog/capacity issues	4%	6%	4%
Biennial testing is the common approach across Europe	4%	2%	2%
Other reasons given included - savings for drivers – the current high pass rate in NI – worked during Covid/TEC period – biennial testing being dependant on a low annual mileage – the examiner having an option to require the next test to be annual, if for example the vehicle passes on retest.			
<b>REASON FOR RESPONDING “NO” TO EACH ELEMENT OF QUESTION 1</b>	<b>CARS</b>	<b>LGVS</b>	<b>MOTOR CYCLES</b>
<b>No. of respondents</b>	<b>177</b>	<b>524</b>	<b>204</b>
Owners are not trusted to continue to take their vehicle for annual servicing / maintenance by garages/dealers without the trigger of an annual MOT. Result will be a significant increase in cars on the roads with defects which will lead to more RTCs and more casualties.	54%	19%	43%
No reason provided	26%	64%	42%
Needs to be annual as a lot can go wrong in a year and some parts can wear out in a year.	15%	4%	11%
LGVs deemed higher risk as they are likely not driven by owners, do more miles and more likely to be driven harder/abused	-	12%	-

**AUTOMOTIVE INDUSTRY**

<b>REASON FOR RESPONDING "YES" TO EACH ELEMENT OF QUESTION 1</b>	<b>CARS</b>	<b>LGVS</b>	<b>MOTOR CYCLES</b>
<b>No. of respondents</b>	6	4	11
Biennial testing needed to address MOT backlog/capacity issues.	50%	50%	9%
Modern vehicles are better constructed and are safer	33%	25%	18%
No reason provided	17%	50%	64%
Yes - Dependant on annual servicing / maintenance by garages/dealers continuing to be undertaken, either because drivers would want to ensure the roadworthiness of their vehicle or because, for younger vehicles, annual servicing would be required under warranty/ contract obligations.	-	-	9%
<b>REASON FOR RESPONDING "NO" TO EACH ELEMENT OF QUESTION 1</b>	<b>CARS</b>	<b>LGVS</b>	<b>MOTOR CYCLES</b>
<b>No. of respondents</b>	47	49	41
Private car owners are not trusted to continue to take their cars for annual servicing / maintenance by garages/dealers without the trigger of an annual MOT. Result will be a significant increase in cars on the roads with defects which will lead to more RTCs and more casualties.	76%	74%	71%
Needs to be annual as a lot can go wrong in a year and some parts can wear out in a year. Annual testing working in terms of statistics for RTC defect causation.	17%	16%	17%
No reason provided	7%	8%	10%
LGVs deemed higher risk as they are likely not driven by owners, do more miles and more likely to be driven harder/abused	-	2%	-

**MOTORING ORGANISATIONS / GROUPS**

<b>REASONS FOR RESPONDING "YES" TO EACH ELEMENT OF QUESTION 1</b>	<b>CARS</b>	<b>LGVS</b>	<b>MOTOR CYCLES</b>
<b>No. of respondents</b>	4	2	2
Vehicle owners are trusted to continue to take their vehicles for annual servicing / maintenance by garages/dealers.	25%	-	-
Modern vehicles are better constructed and are safer.	25%	50%	-
Very small number of serious RTCs / casualties caused by vehicle defects	25%	-	50%
No reason provided	25%	50%	50%
<b>REASON FOR RESPONDING "NO" TO EACH ELEMENT OF QUESTION 1</b>	<b>CARS</b>	<b>LGVS</b>	<b>MOTOR CYCLES</b>
<b>No. of respondents</b>	0	2	2
No reason provided	-	100%	50%
Motorbikes deemed higher risk and need to be tested annually			50%

**OTHER ORGANISATIONS / GROUPS**

<b>ORGANISATION / GROUP</b>	<b>REASONS FOR RESPONDING "YES" TO EACH ELEMENT OF QUESTION 1</b>	<b>CARS</b>	<b>LGVS</b>	<b>MOTOR CYCLES</b>
Alliance Party	<p>Based on research undertaken concerning testing regimes in other countries across Europe and developments in terms of car safety, Alliance believes that a case exists for moving to 4 + 2 + 1 model.</p> <p>The 4 + 2 + 1 model should be piloted amongst a portion of vehicles and if successful widened out across Northern Ireland alongside a further pilot of the 4 + 2 + 2 model in order to build a strong evidence base for change that will engender public confidence for a move to 4 + 2 + 1 and then 4 + 2 + 2.</p> <p>Alliance note that modern cars are increasingly built with the highest standard of safety features and vehicle defects are reported to be a very small causation factor in serious RTCs and casualties. They also note that biennial testing aligns with the EU Roadworthiness Directive's minimum testing requirements for private cars and light commercial vehicles.</p>	YES	YES	YES
<b>ORGANISATION / GROUP</b>	<b>REASONS FOR RESPONDING "NO" TO EACH ELEMENT OF QUESTION 1</b>	<b>CARS</b>	<b>LGVS</b>	<b>MOTOR CYCLES</b>
PSNI	<p>PSNI note that over the last 3 years, they have recorded an increase in the number of vehicles detected breaching Construction &amp; Use regulations:</p> <p>1/8/2018 - 31/7/2019 - 1,914  1/8/2019 - 31/7/2020 - 2,372  1/8/2020 - 31/7/2021 - 3,090</p> <p>PSNI state that: <i>"Experience would indicate that the economics of commercial vehicle maintenance is that owners will seek to save money where possible. The number of first-time test failures would support the hypothesis that the DVA is regarded as a cheap diagnostic service."</i></p> <p><i>"With re-test rates currently running at around 20% when vehicles are subject to annual tests, what might this rise to with biennial testing?"</i></p> <p>PSNI also point to anecdotal evidence and actual observations that suggest there has been an upsurge in modified cars and organised meets occurring across NI. One explanation may be that because vehicles have not had to be presented for test, that some owners are using this hiatus to modify their cars in the knowledge that they won't be inspected - willing to take the chance that police and DVA enforcement won't catch them.</p>	NO	NO	NO

NIPSA	NIPSA's strong view is that good road safety regarding vehicles in NI has been achieved mainly by the NI MOT system. A government run system by government employees, regulated to ensure a high standard of testing and safety on the road. NIPSA believes that the independence of the service gives customer and public confidence in the general condition of vehicles on their roads. NIPSA state that: <i>"To reduce the frequency of testing would erode the safety aspect and public confidence."</i>	NO	NO	NO
Association of British Insurers (ABI)	<p>ABI do not support a move to biennial testing and state that: <i>"More sporadic technical inspections for vehicles would increase the risk of poorly maintained vehicles on the roads. This could ultimately have a negative impact on road safety and the uncertainty posed by biennial testing may need to be reflected in premium pricing."</i></p> <p>ABI viewed a lot of the questions as counterfactual thinking. <i>"For example, because someone has failed an MOT for having worn tyres, they would then have them replaced, thereby reducing the chance of an accident. However, it could be argued this is a sign of future behaviour which would also favour more frequent MOT testing. One of our Members found that those who've previously failed an MOT for worn tyres have a claims frequency 10% higher than those that haven't."</i></p>	NO	NO	NO
British Insurance Brokers Association (BIBA)	BIBA members strongly disagree with the introduction of biennial testing. <i>"The response from our Northern Ireland member brokers is clear: this proposal would lead to more bad news for the Northern Ireland motor insurance market and consumers. If the MOT frequency was changed to every two years, we would anticipate an increased accident frequency risk, for example due to tyres being past their safety limit. Our concerns are even higher for vans which are often driven all day and not parked up, and their heavy usage without an annual check would inevitably lead to more incidents and ultimately higher premiums in NI."</i> BIBA believe that many people only service their vehicles when the MOT is due, being nudged into action by the current system to perform maintenance at least annually. Others often wait to see what their vehicle fails on before taking any action. It was noted that Motor insurers will have a clause in their policies stating that vehicles must be roadworthy, BIBA members were therefore concerned that claim rejections would rise due to an increase in vehicles being found not to be roadworthy following an incident.	NO	NO	NO

## QUESTION 2

If biennial vehicle testing were to be introduced in Northern Ireland for private cars, light goods vehicles under 3,500kg, and/or motorcycles should the first mandatory vehicle test remain at 4 years for private cars and motorcycles and 3 years for light goods vehicles?

### INDIVIDUALS

REASONS FOR RESPONDING "YES" TO EACH ELEMENT OF QUESTION 2	CARS	LGVS	MOTOR CYCLES
<b>No. of respondents</b>	999	1004	997
No reason provided	93%	87%	94%
Content to maintain status quo	7%	12%	6%
REASON FOR RESPONDING "NO" TO EACH ELEMENT OF QUESTION 2	CARS	LGVS	MOTOR CYCLES
<b>No. of respondents</b>	150	129	139
First mandatory test should be later – generally based on modern vehicles being better constructed and safer. Options range from 5 to 7 years - generally based on manufacturer / dealer warranties	55%	38%	50%
First mandatory test for LGVs should be at 4 years – to match cars & motorcycles	-	23%	-
First mandatory test should be earlier – generally because significant issues can arise with vehicles before they are 3 /4 years old – at least in line with GB first test.	33%	16%	32%
No reason provided	4%	12%	9%
MOT testing should be based on annual mileage rather than age	3%	3%	4%

### AUTOMOTIVE INDUSTRY

REASON FOR RESPONDING "YES" TO EACH ELEMENT OF QUESTION 2	CARS	LGVS	MOTOR CYCLES
<b>No. of respondents</b>	30	36	32
No reason provided	70%	58%	66%
Content to maintain status quo	30%	42%	34%
REASON FOR RESPONDING "NO" TO EACH ELEMENT OF QUESTION 2	CARS	LGVS	MOTOR CYCLES
<b>No. of respondents</b>	21	15	18
First mandatory test should be earlier – generally because significant issues can arise with vehicles before they are 3 /4 years old – at least in line with GB first test.	90%	47%	89%
First mandatory test should be later – generally based on modern vehicles being better constructed and safer. Options range from 5 to 7 years - generally based on manufacturer / dealer warranties	5%	-	5%
MOT testing should be based on annual mileage rather than age	5%	6%	5%
Status Quo – 7 respondents answered no on the basis that all first tests should be earlier at 3 years – but for light goods vehicles the mandatory test is already at 3 years. <i>It appears that these responses should properly fall under "YES"</i>	-	47%	-

**MOTORING ORGANISATIONS / GROUPS**

<b>REASONS FOR RESPONDING “YES” TO EACH ELEMENT OF QUESTION 2</b>	<b>CARS</b>	<b>LGVS</b>	<b>MOTOR CYCLES</b>
<b>No. of respondents</b>	4	3	3
No reason provided	50%	66%	66%
Content to maintain status quo	50%	33%	33%
<b>REASON FOR RESPONDING “NO” TO EACH ELEMENT OF QUESTION 2</b>	<b>CARS</b>	<b>LGVS</b>	<b>MOTOR CYCLES</b>
<b>No. of respondents</b>	-	1	1
No reason provided		100%	100%

**OTHER ORGANISATIONS / GROUPS**

<b>ORGANISATION / GROUP</b>	<b>REASON FOR RESPONSE TO EACH ELEMENT OF QUESTION 2</b>	<b>CARS</b>	<b>LGVS</b>	<b>MOTOR CYCLES</b>
PSNI	Light goods vehicles do greater miles and are subject to greater wear and tear than private cars so should be tested earlier.	YES	YES	YES
NIPSA	Any increase in years would be detrimental to road and public safety. NIPSA pointed to successful lobbying on road safety grounds in 2018 to maintain the existing 3-1-1 MOT model in GB after the government proposed changing the period before a private car’s first MOT from 3 to 4 years.	YES	YES	YES
Alliance Party	Content to maintain status quo. Light goods vehicles are used commercially, spend more time on the road and travel further.	YES	YES	YES
ABI	No Comment	-	-	-
BIBA	No Comment	-	-	-



## QUESTION 3

If biennial testing is introduced for private cars, light goods vehicles under 3,500kg, and/or motorcycles should this be extended to vehicles over 10 years old?

INDIVIDUALS

REASONS FOR RESPONDING "YES" TO EACH ELEMENT OF QUESTION 3	CARS	LGVS	MOTOR CYCLES
<b>No. of respondents</b>	674	493	652
No reason provided	86%	84%	86%
Yes - Dependant on annual servicing / maintenance by garages/dealers continuing to be undertaken, either because drivers would want to ensure the roadworthiness of their vehicle or because, for younger vehicles, annual servicing would be required under warranty/ contract obligations.	4%	5%	4%
Modern vehicles are better constructed and are safer.	3%	3%	2%
Biennial testing needed to address MOT backlog/capacity issues	3%	4%	3%
Other reasons given included – EU standard approach – annual should be introduced later – approach worked during Covid/TEC period			
REASON FOR RESPONDING "NO" TO EACH ELEMENT OF QUESTION 3	CARS	LGVS	MOTOR CYCLES
<b>No. of respondents</b>	479	649	484
Vehicles should be tested annually from 10 years old. For the most part, no further reason given for this view but the following sub-reasons were mentioned: - Modern vehicles are better constructed and are safer - Deterioration greater in older vehicles - Owners not trusted to continue to take their vehicles for annual servicing / maintenance by garages/dealers without annual MOT trigger -LGVs likely to do more miles and suffer more abuse	73%	76%	74%
Vehicles should be tested annually from an earlier age	12%	10%	11%
Biennial testing should not be introduced – retain annual testing	11%	10%	11%
Vehicles should be tested annually from a later age	3%	3%	3%

AUTOMOTIVE INDUSTRY

REASON FOR RESPONDING "YES" TO EACH ELEMENT OF QUESTION 3	CARS	LGVS	MOTOR CYCLES
<b>No. of respondents</b>	6	5	6
No reason provided	50%	40%	50%
Biennial testing should not be introduced and annual testing should be retained – 2 respondents answered "Yes" on this basis <i>It appears that these responses should properly fall under "NO"</i>	33%	40%	33%
Modern vehicles are better constructed and are safer	17%	20%	17%
REASON FOR RESPONDING "NO" TO EACH ELEMENT OF QUESTION 3	CARS	LGVS	MOTOR CYCLES
<b>No. of respondents</b>	46	47	45
Biennial testing should not be introduced – retain annual testing	61%	60%	60%

Vehicles should be tested annually from 10 years old. For the most part, no further reason given for this view but the following sub-reasons were mentioned: - Modern vehicles are better constructed and are safer - Deterioration greater in older vehicles - Owners not trusted to continue to take their vehicles for annual servicing / maintenance by garages/dealers without annual MOT trigger - LGVs likely to do more miles and suffer more abuse	30%	32%	33%
Vehicles should be tested annually from an earlier age	9%	8%	9%

### MOTORING ORGANISATIONS / GROUPS

REASONS FOR RESPONDING "YES" TO EACH ELEMENT OF QUESTION 3	CARS	LGVS	MOTOR CYCLES
<b>No. of respondents</b>	3	2	2
No reason provided	75%	50%	50%
REASON FOR RESPONDING "NO" TO EACH ELEMENT OF QUESTION 3	CARS	LGVS	MOTOR CYCLES
<b>No. of respondents</b>	1	2	2
Vehicles should be tested annually from 10 years old.	100%	100%	100%

### OTHER ORGANISATIONS / GROUPS

ORGANISATION / GROUP	REASON FOR RESPONSE TO EACH ELEMENT OF QUESTION 3	CARS	LGVS	MOTOR CYCLES
PSNI	Don't agree that biennial testing should be introduced but if it were vehicles should be tested annually from an earlier age – PSNI suggest at 8 years rather than 10 years.	NO	NO	NO
NIPSA	Don't agree that biennial testing should be introduced – retain annual testing	NO	NO	NO
Alliance Party	All vehicles should be tested annually from 10 years old <i>"Evidence shows that the number of cars failing MOTs increases with the age of the car and in order to ensure older cars, which will not typically have latest safety technology installed, are safe for drivers, they should go through an annual MOT once the vehicle is over 10 years old"</i> .	NO	NO	NO
ABI	Don't agree that biennial testing should be introduced but if it were, vehicles should be tested annually from 10 years old or earlier. Suggest exploring the potential to introduce mileage caps for MOTs (e.g., every 20,000 miles) as opposed to requirements based on time.	NO	NO	NO
BIBA	Don't agree that biennial testing should be introduced but it were older vehicles should be tested more regularly – particular concerns raised over the increased failure rates for older vehicles.	NO	NO	NO

## QUESTION 4

**Do you believe moving to biennial vehicle testing for private cars, light goods vehicles under 3,500kg and/or motorcycles would have any impact on road safety?**

INDIVIDUALS

REASONS FOR RESPONDING "YES" TO QUESTION 4	YES
<b>No. of respondents</b>	227
Owners are not trusted to continue to take their vehicle for annual servicing / maintenance by garages/dealers without the trigger of an annual MOT. Result will be a significant increase in cars on the roads with defects which will lead to more RTCs and more casualties.	52%
No reason provided	34%
Lack of maintenance / servicing during Covid/TEC period evident	8%
A lot can go wrong with significant parts of a vehicle in a year and tyres / some integral parts can wear out.	4%
Older vehicles not being tested annually will represent a road safety risk	3%
REASONS FOR RESPONDING "NO" TO QUESTION 4	NO
<b>No. of respondents</b>	924
No reason provided	81%
No – Dependant on annual servicing / maintenance by garages/dealers continuing to be undertaken, either because drivers would want to ensure the roadworthiness of their vehicle or because, for younger vehicles, annual servicing would be required under warranty / contract obligations.	8%
A very small number of KSIs / collisions are caused by vehicle defects (as per statistics)	4%
Modern vehicles are better constructed and are safer	4%
Other reasons given included - road safety hasn't deteriorated during Covid/TEC period – answer "No" with caveat that light goods vehicles and older vehicles should be tested annually – money needs to be spent on improving roads to improve road safety.	

AUTOMOTIVE INDUSTRY

REASON FOR RESPONDING "YES" TO QUESTION 4	YES
<b>No. of respondents</b>	46
Owners are not trusted to continue to take their vehicle for annual servicing / maintenance by garages/dealers without the trigger of an annual MOT. Result will be a significant increase in cars on the roads with defects which will lead to more RTCs and more casualties.	46%
Lack of maintenance / servicing during Covid/TEC period evident.	39%
A lot can go wrong with significant parts of a vehicle in a year and tyres / some integral parts can wear out.	9%
No reason provided	6%
REASON FOR RESPONDING "NO" TO QUESTION 4	NO
<b>No. of respondents</b>	6

No - Dependant on annual servicing / maintenance by garages/dealers continuing to be undertaken, either because drivers would want to ensure the roadworthiness of their vehicle or because, for younger vehicles, annual servicing would be required under warranty / contract obligations.	50%
Modern vehicles are better constructed and are safer	16%
Road safety hasn't deteriorated during Covid/TEC period	16%
No reason provided	16%

### MOTORING ORGANISATIONS / GROUPS

REASON FOR RESPONDING "NO" TO QUESTION 4	NO
	<b>No. of respondents</b> 4
A very small number of KSIs / collisions are caused by vehicle defects (as per statistics)	50%
No - Dependant on annual servicing / maintenance by garages/dealers continuing to be undertaken, either because drivers would want to ensure the roadworthiness of their vehicle or because, for younger vehicles, annual servicing would be required under warranty / contract obligations.	25%
No reason provided	25%

### OTHER ORGANISATIONS / GROUPS

ORGANISATION / GROUP	REASON FOR RESPONSE TO QUESTION 4	
PSNI	<p>PSNI state that: <i>"Recent police observations are that a greater proportion of vehicles that we have encountered during the last 18 months have been carrying defects. Many more tyres worn to extreme levels than would have been common pre-pandemic. The views of mechanics, tyre fitters and auto-spares suppliers would seem to support the view that many drivers are postponing servicing and purchase of replacement parts."</i></p> <p>They also state that: <i>"Police cannot conceive that a move to biennial testing could be regarded as anything but a dilution of vehicle safety standards."</i></p>	YES
NIPSA	<p><i>"The economic climate in NI over previous years has shown how people only spend on things that are needed at that point. Experience in test centres would indicate that new components etc. are fitted within days of the test, vehicles that fail show signs indicating that failed components have been in that condition for some time and vehicle has still been used on the road."</i></p> <p>In terms of the ability of drivers to properly maintain their vehicles without the prompt of an annual MOT test to get their cars checked professionally, NIPSA pointed to an AA-Populous poll in 2017 that suggested that many British drivers cannot carry out basic vehicle safety checks. Results showed that over a million drivers don't know how to prepare their car for the cold weather, while a similar number aren't even sure how to open the car bonnet. More than a fifth (22%) of</p>	YES

	motorists are unsure how to check their tyre thread depth, over half (53%) don't know how to check the power steering is working and over a third (38%) wouldn't know how to check their brake fluid is at a safe level.	
ABI	<p>ABI state that: <i>"We believe that more sporadic technical inspections for vehicles would increase the risk of poorly maintained vehicles on the roads. This could ultimately have a negative impact on road safety and the uncertainty posed by biennial testing may need to be reflected in premium pricing.</i></p> <p>ABI acknowledge that drivers will still have a statutory responsibility to ensure that their vehicles are roadworthy regardless of the frequency of MOT testing. However they state that: <i>"...certain elements critical to the safe operation of a vehicle including the brakes, steering column, and suspension that are regularly checked in MOT testing are much harder, if not impossible, to assess for a vehicle owner without the proper equipment, diagnostic tools and experience."</i> They also question whether the average driver has the knowledge and foresight to gauge the severity of tyre wear/damage.</p>	YES
BIBA	<p>BIBA note that there are a number of data points against 2-year testing in DFI's Driver, Vehicle, Operator, and Enforcement Statistics report, in particular the data showing that private car &amp; light goods vehicles steadily decreasing in pass rate (increasing failure rate) year on year.</p> <p>BIBA state that: <i>"The two-year proposal is a backward step which could result in more accidents, worse carbon emissions, more injuries and higher premiums."</i></p>	YES
<b>ORGANISATION / GROUP</b>	<b>REASON FOR RESPONSE TO QUESTION 4</b>	
Alliance Party	Given that statistics show that less than 2% of injuries and collisions are due to vehicle defects, Alliance have no reason to believe that these changes would impact on road safety.	NO

## QUESTION 5

**Do you believe moving to biennial vehicle testing for private cars, light goods vehicles under 3,500kg and/or motorcycles would have an adverse economic impact on the automotive and vehicle maintenance industry and those specifically involved in MOT preparation?**

### INDIVIDUALS

<b>REASONS FOR RESPONDING "YES" TO QUESTION 5</b>	<b>YES</b>
<b>No. of respondents</b>	238
No reason provided	58%
Owners are not trusted to continue to take their vehicle for annual servicing / maintenance by garages/dealers without the trigger of an annual MOT. Result will be an adverse economic impact on the sector including job losses and potentially business closures. Evidenced during Covid-19 period.	40%
Other reasons given included – DVA charge increases – larger bills in testing year.	
<b>REASONS FOR RESPONDING "NO" TO QUESTION 5</b>	<b>NO</b>
<b>No. of respondents</b>	911
No reason provided	79%
No – Dependant on annual servicing / maintenance by garages/dealers continuing to be undertaken, either because drivers would want to ensure the roadworthiness of their vehicle or because, for younger vehicles, annual servicing would be required under warranty/ contract obligations.	12%
Garages always busy – currently a skills shortage – will ease pressure; particularly given current backlog	5%
Other reasons given included – works ok in EU countries – increasing vehicle numbers will offset impact – can't just stick to annual testing to save the industry from the potential economic impact	

### AUTOMOTIVE INDUSTRY

<b>REASON FOR RESPONDING "YES" TO QUESTION 5</b>	<b>YES</b>
<b>No. of respondents</b>	45
Owners are not trusted to continue to take their vehicle for annual servicing / maintenance by garages/dealers without the trigger of an annual MOT. This has been experienced during the Covid/TEC period. Result will be an adverse economic impact on the sector, loss of trade, job losses, reduced profits and potentially business closures.	82%
No reason provided	13%
<b>REASON FOR RESPONDING "NO" TO QUESTION 5</b>	<b>NO</b>
<b>No. of respondents</b>	6
No reason provided	50%
No – Dependant on annual servicing / maintenance by garages/dealers continuing to be undertaken, either because drivers would want to ensure the roadworthiness of their vehicle or because, for younger vehicles, annual servicing would be required under warranty/ contract obligations.	33%
Garages always busy – will ease pressure	17%

**MOTORING ORGANISATIONS / GROUPS**

REASON FOR RESPONDING “NO” TO QUESTION 5	NO
	No. of respondents 4
No reason provided	50%
No – Dependant on annual servicing / maintenance by garages/dealers continuing to be undertaken, either because drivers would want to ensure the roadworthiness of their vehicle or because, for younger vehicles, annual servicing would be required under warranty / contract obligations.	25%
Garages always busy – will ease pressure	25%

**OTHER ORGANISATIONS / GROUPS**

ORGANISATION / GROUP	REASON FOR RESPONSE TO QUESTION 5	YES
PSNI	<i>“Observations made to police by mechanics and those in the motor trade indicated a huge drop-off in volumes of business when people realised they wouldn’t have to present their vehicle for test as anticipated. Given the additional financial pressures the pandemic has created, it is not surprising that some chose to for-go servicing. It stands to sense that if testing is only conducted every other year that demand for servicing will decrease. Not everyone will maintain a yearly servicing regime. This may be counter-balanced by additional work required when the vehicle is presented for service.”</i>	YES
NIPSA	NIPSA believe that there would be a significant impact on the future of small garages across NI. They state that: <i>“A significant section of the NI public would rather use the small independent businesses as they tend to be less costly and people trust them more to do the job right. Small garages depend on local customer bases and therefore tend to look after them better. MOT preparation and service is a large part of their business.”</i>  NIPSA also stated that: <i>“The location of public sector jobs has an important role with reference to economic and social development in rural areas. Biennial MOT testing therefore would create greater barriers in terms of social need, rural development and employment opportunities in both the public and private sectors. An EQIA would need to be carried out to assess the impact.”</i>	YES
Alliance Party	Alliance share some concerns in relation to an adverse economic impact that is supported by anecdotal evidence of a decrease in the road worthiness of vehicles during COVID-19 lockdowns when MOTs were suspended and Temporary Exemption Certificates were being issued. The piloting of biennial testing that Alliance is proposing would help to establish an evidence base to facilitate empirical consideration of the impact.  Alliance note that vehicles must however be roadworthy at all times and importantly also note that MOT preparation is not the only work that those within the automotive and vehicle maintenance industry do. They suggest that the increase in the use of electric cars will also bring about new opportunities for those within the automotive and vehicle maintenance industry.	

## QUESTION 6

**Do you believe moving to biennial vehicle testing for private cars, light goods vehicles under 3,500kg and/or motorcycles would have an adverse environmental impact, including an impact on the health and well-being of the public? Please answer yes or no.**

INDIVIDUALS

REASONS FOR RESPONDING "YES" TO QUESTION 6	YES
<b>No. of respondents</b>	183
No reason provided	57%
More unroadworthy, high emission, noise polluting vehicles that are not fuel efficient on the road – polluting the environment and putting the health and wellbeing of the public at risk.	40%
REASONS FOR RESPONDING "NO" TO QUESTION 6	NO
<b>No. of respondents</b>	966
No reason provided	92%
No – Dependant on annual servicing / maintenance by garages/dealers continuing to be undertaken, either because drivers would want to ensure the roadworthiness of their vehicle or because, for younger vehicles, annual servicing would be required under warranty / contract obligations.	3%
Modern vehicles are better constructed, safer and cleaner. The increase in electric and hybrid vehicles will also help.	2%
Other reasons given included – less unnecessary wastage of consumables – diesel emissions not being done now and biennial may see that change – mental health benefits through reduced stress of booking process / driving without an MOT	

AUTOMOTIVE INDUSTRY

REASON FOR RESPONDING "YES" TO QUESTION 6	YES
<b>No. of respondents</b>	41
More unroadworthy, high emission, noise polluting vehicles that are not fuel efficient on the road – polluting the environment and putting the health and wellbeing of the public at risk.	68%
No reason provided	27%
Other reasons given included – drivers less confident and anxious with more unroadworthy vehicles about – more cars scraped through lack of maintenance	
REASON FOR RESPONDING "NO" TO QUESTION 6	NO
<b>No. of respondents</b>	10
No reason provided	70%
No evidence of an adverse impact from the introduction of biennial testing	20%
No – Dependant on annual servicing / maintenance by garages/dealers continuing to be undertaken, either because drivers would want to ensure the roadworthiness of their vehicle or because, for younger vehicles, annual servicing would be required under warranty / contract obligations.	10%



**MOTORING ORGANISATIONS / GROUPS**

REASON FOR RESPONDING “NO” TO QUESTION 6	NO
	<b>No. of respondents</b> 4
No reason provided	75%
No – Dependant on annual servicing / maintenance by garages/dealers continuing to be undertaken, either because drivers would want to ensure the roadworthiness of their vehicle or because, for younger vehicles, annual servicing would be required under warranty / contract obligations.	25%

**OTHER ORGANISATIONS / GROUPS**

ORGANISATION / GROUP	REASON FOR RESPONSE TO QUESTION 6	
PSNI	PSNI are concerned that DVA’s vehicle emissions testing is currently not what it should be. They state that if new testing stations with state of the art equipment to test vehicle exhausts are not going to be established as envisaged, it stands to reason that air quality will be affected due to there being no Agency fully enforcing the relevant legislation.	YES
NIPSA	<i>“Modified cars are becoming more prevalent on NI roads. From lowered suspension systems and changing of vehicle electronic management systems to adjust power output by adjusting fuel and turbo, to the fitting of extremely loud exhaust systems. When done correctly these may pose a problem for insurance companies and HMRC due to the possibility of the tax band becoming higher as with the power output, the vehicle should at least in theory remain safe. Reality would suggest though that in the majority of cases this is done by the owners or friends and can leave the vehicle in an unsafe condition. Impact would be excess noise, excess emissions and increased likelihood of accidents.”</i>	YES
ABI	Given that MOTs are designed to include an assessment of exhaust and emissions, ABI state that: <i>“Considering the Government’s drive to decarbonise transport, we believe that the move to biennial MOT testing could go against these efforts.”</i>	YES
BIBA	<i>“The two-year proposal is a backward step which could result in more accidents, worse carbon emissions, more injuries and higher premiums.”</i>	YES
ORGANISATION / GROUP	REASON FOR RESPONSE TO QUESTION 6	
Alliance Party	While Alliance don’t at this point believe that there will be an adverse impact, they are content that their proposed pilot approach would address concerns and build an evidence base. They also note that introducing biennial testing would provide DfI with greater opportunity to safely reintroduce diesel smoke emissions testing.	NO

## QUESTION 7

Do you believe the frequency in NI of the diesel smoke emissions testing of private cars and light goods vehicles should be biennial?

INDIVIDUALS

REASONS FOR RESPONDING "YES" TO QUESTION 7	YES
<b>No. of respondents</b>	<b>833</b>
No reason provided	92%
Modern vehicles are better constructed, safer and cleaner. The increase in electric and hybrid vehicles will also help.	3%
Diesel smoke emission testing should be done in line with full MOT test, i.e. biennially	2%
Emission system and diesel smoke emission testing should be done by private garages between biennial MOT tests.	2%
REASONS FOR RESPONDING "NO" TO QUESTION 7	NO
<b>No. of respondents</b>	<b>316</b>
No reason provided	74%
Emissions testing must be done on an annual basis to avoid unchecked high emissions / pollution	22%
There is an issue with the establishment of an emissions test that is in line with EU requirements as it requires the over revving of the engine which can damage or wreck the engine	2%
Other reasons given included – should be outsourced to private garages if DVA can't do it – should be based on mileage - should be every 5 years	

AUTOMOTIVE INDUSTRY

REASON FOR RESPONDING "YES" TO QUESTION 7	YES
<b>No. of respondents</b>	<b>11</b>
No reason provided	64%
Modern vehicles are better constructed, safer and cleaner. The increase in electric and hybrid vehicles will also help.	27%
Diesel being phased out	9%
REASON FOR RESPONDING "NO" TO QUESTION 7	NO
<b>No. of respondents</b>	<b>40</b>
Emissions testing must be done on an annual basis to avoid unchecked high emissions / pollution	55%
No reason provided	35%
There is an issue with the establishment of an emissions test that is in line with EU requirements as it requires the over revving of the engine which can damage or wreck the engine	7%
Emissions test should be outsourced to private garages	3%

**MOTORING ORGANISATIONS / GROUPS**

REASON FOR RESPONDING "YES" TO QUESTION 7	
	<b>No. of respondents</b>
	3
No reason provided	67%
Diesel smoke emission testing should be done in line with full MOT test, i.e. biennially	33%

**OTHER ORGANISATIONS / GROUPS**

ORGANISATION / GROUP	REASON FOR RESPONSE TO QUESTION 7	
PSNI	PSNI point to their answer to the previous question and their current observance of vehicles where the owners appear to be oblivious to the black plumes of smoke being emitted and the smoke marks on the rear of their vehicles. They are therefore concerned that this would get worse under a biennial testing regime.	NO
NIPSA	<i>NIPSA stat that: "Exhaust emissions are set by manufacturers and notified to government. These can change dramatically when vehicles are modified causing excess noise and excess emissions damaging people's health and the environment. Annual emissions checks are vital to protect the environment and health."</i>  NIPSA also refer to evidence in the UK to suggest that areas of social deprivation tend to be the most polluted from car emissions." They point to a 2017 RAC report titled " <i>MOToring Along: The lives of cars seen through licensing and test data.</i> "	NO
ORGANISATION / GROUP	REASON FOR RESPONSE TO QUESTION 7	
Alliance Party	Alliance are unsure, on the answer to this question but believe that a pilot and related evidence base need to be developed.	
ABI	No Comment	
BIBA	No Comment	

**QUESTION 8**

Do you believe that there would be other impacts arising from a move to biennial vehicle testing for private cars, light goods vehicles under 3,500kg and/or motorcycles?

**INDIVIDUALS**

<b>REASONS FOR RESPONDING "YES" TO QUESTION 8</b>	<b>YES</b>
<b>No. of respondents</b>	<b>208</b>
No reason provided	53%
More defective / unroadworthy vehicles on the roads and therefore more RTCs, more casualties and fatalities.	17%
DVA will get time to sort their booking and testing systems out and deal with backlog.	11%
Drop in confidence in local second hand car market. Buyers may seek GB cars that have been more recently tested.	5%
Job losses – including likely reductions in DVA staff and Testing Centres	5%
Improved mental health – stress of booking an MOT and/or driving without one remedied	2%
Insurance premiums will rise	2%
<b>REASONS FOR RESPONDING "NO" TO QUESTION 8</b>	<b>NO</b>
<b>No. of respondents</b>	<b>938</b>
No reason provided	100%

**AUTOMOTIVE INDUSTRY**

<b>REASON FOR RESPONDING "YES" TO QUESTION 8</b>	<b>YES</b>
<b>No. of respondents</b>	<b>40</b>
More defective / unroadworthy vehicles on the roads and therefore more RTCs, more casualties and fatalities.	48%
No reason provided	30%
Drop in confidence in local second hand car market. Buyers may seek GB cars that have been more recently tested.	8%
Job losses in industry and DVA	8%
More enforcement activity by DVA and PSNI required.	3%
<b>REASON FOR RESPONDING "NO" TO QUESTION 8</b>	<b>NO</b>
<b>No. of respondents</b>	<b>11</b>
No reason provided	100%

**MOTORING ORGANISATIONS / GROUPS**

REASON FOR RESPONDING "YES" TO QUESTION 8	NO
<b>No. of respondents</b>	1
Economic benefit for drivers	100%
REASON FOR RESPONDING "NO" TO QUESTION 8	NO
<b>No. of respondents</b>	3
No reason provided	100%

**OTHER ORGANISATIONS / GROUPS**

ORGANISATION / GROUP	REASON FOR RESPONSE TO QUESTION 8	
PSNI	<p>In relation to the introduction of biennial testing, PSNI state that: <i>"This would undoubtedly put additional pressure on already stretched police resources. In the absence of the annual testing regime, we would expect to receive more queries from public representatives and compliant motorists who want to know what we're doing to address the increased numbers of unroadworthy vehicles. We would expect the DVA Enforcement team would also come under similar scrutiny."</i></p> <p>PSNI further stated that: <i>"Police resources are finite and we have many competing demands to balance, without this potential extra workload."</i></p>	YES
NIPSA	<p>NIPSA state that: <i>"The introduction of biennial testing would see an increase of defective vehicles being used on the roads of NI and a real possibility of an increase in accidents due to component failure."</i></p> <p>In relation to the collision &amp; injury causation statistics included in the CfE document, NIPSA comment that: <i>"The statistics contained in this document only concentrate on accidents where the vehicle has been inspected by/on behalf of police as a result of serious injury. Accidents where no injury to the person has occurred do not need to be reported to police. With little or no enforcement of private cars etc., vehicles are rarely stopped and examined on the roadside, meaning no records exist of vehicle condition between statutory tests."</i></p> <p>NIPSA also referred to a GO COMPARE Report that advised that: <i>"... 27% of drivers surveyed said they don't do anything to prepare their car for its MOT test.....It's clear from our research, that many drivers dread taking their car for its MOT test - fearing failure and the costs of any necessary repairs. A concerning number of drivers couldn't remember when their car's MOT was due." NIPSA see this as "clear evidence that a move to biennial testing would increase risk on roads."</i></p> <p>NIPSA note that: <i>"The location of public sector jobs has an important role with reference to economic and social development in rural areas. Biennial MOT testing therefore would create greater barriers in terms of social need, rural development and employment opportunities in both the public and private sectors."</i></p>	YES

	<p>In NIPSA's view <i>"a move to biennial testing would impact negatively on road safety, public safety and the economy of Northern Ireland. The proposals have only negative impacts for staff, both in terms of job security and access to employment close to home. The Impact would also have a direct impact on small businesses in rural communities. This in our view would seem to directly conflict with the NI Executives view of creating jobs in rural areas."</i></p>	
Alliance Party	<p>Alliance have concerns in relation to DVA's staffing complement and say that engagement is vital with Trade Union representatives on future work force planning. They state that: "No compulsory redundancies should be considered".</p> <p>They also suggest that: <i>"a changed testing frequency could possibly encourage members of the public to look towards changing their vehicles after 10 years. Potentially With the move towards electric vehicles, this could help to push the uptake of EVs within Northern Ireland."</i></p>	YES

## General Comments

### INDIVIDUALS

General Comments	
Main general comment is that biennial testing will be detrimental in terms of road safety and will lead to more defective vehicles on our roads and resulting in more collisions and KSIs (14 industry respondents 40 individuals make a similar point)	
Biennial testing will make it easier to book an MOT	
Some form of verification for annual servicing should be introduced to compel Drivers to take responsibility for maintaining their vehicles in the years that a biennial test is not due.	
MOT's at 18 month intervals is another option – lessen time between tests.	
Testing should be based on mileage not age	
Greater education and enforcement required to compel drivers to take responsibility	
If biennial introduced – make test tougher with a facility to look ahead and provide advisory info on issues that are likely to arise between biennial tests	
Government need to consider some use of private sector	
Some thought current system (excluding recent difficulties) is a source of pride	
Government would be better spending money on roads maintenance	
General welcome for consideration of biennial testing but recognised that some owners/drivers are more conscientious than others	

### AUTOMOTIVE INDUSTRY

General Comments	
Main general comment is that biennial testing is a backward step in terms of road safety and will lead to more defective vehicles on our roads and resulting in more collisions and KSIs (40 individual respondents make a similar point)	
Need to set up new roadside inspection team	
Government need to consider some use of private sector	

### MOTORING ORGANISATIONS / GROUPS

General Comments	
General welcome for consideration of biennial testing but recognised that some owners/drivers are more conscientious than others	

### OTHER ORGANISATIONS / GROUPS

General Comments	
PSNI	<i>"In GB the most recent attempt [2018] to extend first-time testing from 3 to 4 years was rejected by the public who cited road safety and failure to maintain vehicles as their primary concerns. Police cannot conceive that a move to</i>

	<i>biennial testing could be regarded as anything but a dilution of vehicle safety standards. Police acknowledge that DVA are experiencing significant operational challenges within their testing regime but do not believe that this proposal is the only avenue to resolve these issues.”</i>
NIPSA	<p><i>“In NIPSA’s view a move to biennial testing would impact negatively on road safety, public safety and the economy of Northern Ireland. The proposals have only negative impacts for staff, both in terms of job security and access to employment close to home. The Impact would also have a direct impact on small businesses in rural communities. This in our view would seem to directly conflict with the NI Executives view of creating jobs in rural areas.</i></p> <p><i>NIPSA are of the opinion that any proposal to take this initiative forward would need to have a full Equality Impact assessment.</i></p> <p><i>NIPSA therefore is opposed to Biennial MOT Testing.”</i></p>
BIBA	<i>The Northern Ireland MOT system uses government centres, which is different to GB. We believe this smaller pool of MOT testing capacity is the main problem and the issue that should be attended to rather than risking unsafe vehicles and higher insurance premiums.</i>
ABI	<p><i>“While slightly out of scope of this Call for Evidence, we would encourage the Department for Infrastructure, as well as the Government writ large, to consider the changing vehicle car parc when assessing the MOT testing regime. Cars are increasingly automated, connected, and electric (ACE) and periodic technical inspections may need to reflect these changes. For example, MOT testing parameters may wish to include sensors for automated vehicles, software for connected vehicles, and battery health for electric vehicles.</i></p> <p><i>We would be happy to continue to engage with the Department if you are considering adopting new MOT testing standards for ACE vehicles moving forwards.</i></p>