REVIEW OF VEHICLE INSPECTION ARRANGEMENTS

OUTCOME REPORT

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BACKGROUND

Prior to the last election, the ACT Labor Party made a commitment to review ACT motor vehicle registration arrangements. The review was to include:

- exploring the option of mandatory periodic inspections for vehicles five years of age and then every second year after that;
- investigating reopening a public vehicle inspection station to service South Canberra; and
- reviewing the efficacy of random on-road and car park inspections.

The Minister for Urban Services subsequently decided that the review would be conducted by the Department of Urban Services, with input from stakeholders.

PROCESS

A discussion paper was released for public comment on 2 March 2004, with comments closing on 30 April 2004. A copy of the paper was placed on the Road Transport website, and also provided directly to key stakeholders, including the Motor Trades Association, Department of Transport and Regional Services, Australian Automobile Association, NRMA and other jurisdictions. The review was also publicised in The Canberra Times and on local radio.

The discussion paper addressed the key issue of whether changes to the current light vehicle inspection arrangements would provide any discernible benefit, having regard to the cost of any changes. The paper considered reports and reviews of vehicle inspection arrangements in other jurisdictions, including the available data comparing the rate of crash involvement of vehicles, having regard to the inspection regime applying to those vehicles.

The paper considered the costs associated with a number of vehicle inspection models and noted that a return to periodic inspections would significantly increase the cost to the community with no demonstrable additional road safety benefit.

The discussion paper, therefore, concluded that maintaining the current inspection arrangements for light vehicles (less than 4.5 tonnes Gross Vehicle Mass) would provide the most cost effective vehicle inspection regime for the ACT. It proposed that light vehicles continue to be inspected on original registration and on transfer of registration once the vehicle is over six years of age. It was also proposed that vehicles continue to be subject to random inspections in car parks and on-road, and inspected if issued with a defect notice.
RESPONSES TO DISCUSSION PAPER

The review was publicised by issuing a media release on 2 March 2004, an advertisement in The Canberra Times on 6 March 2004, including information about the review in the Government Entry Point webpage and the road transport website. Departmental officers also participated in a talkback radio program on ABC radio.

Only 18 responses to the paper were received. Given that there are nearly a quarter of a million registered vehicles in the ACT, this seems to indicate that the community does not regard vehicle inspections and the current arrangements, in particular, with any concern.

Of the very limited number of responses received, they were balanced between those who supported the current arrangements, and those who argued for a return to annual or more regular vehicle inspections.

A number of related vehicle inspection issues were raised in the responses, as well as a number of comments on other transport matters. In the majority of cases little, if any, supporting evidence was offered for the position of the respondent.

ISSUES RAISED IN RESPONSES

Motor Trades Association comments

Of those respondents who favoured a return to periodic inspections the Motor Trades Association (MTA) provided the most extensive response. Of the options outlined in the discussion paper, the MTA favoured inspection of light vehicles at five years of age and then every second year after that, as the basis for change. However, the MTA argued that its preferred position would be for:

- all vehicles over 3 years of age to have mandatory inspections at either Government facilities or at authorised inspection stations;
- all vehicles over 3 years of age to be inspected in the same manner on transfer of ownership;
- random inspections be maintained.

In support of its position, the MTA also raised the following issues set out below in italics.
The discussion paper fails to mention inspection of vehicle emissions and compliance with the Australian Design Rules (ADRs) and standards as objectives of the vehicle inspection process.

Comment

Emissions and ADR compliance are treated as safety related issues by Urban Services, however with the increasing performance based nature of these standards it is becoming more difficult, if not impossible, for any inspection program to check on whether a vehicle complies or not. For example, in order to demonstrate compliance of primary safety systems such as brakes and occupant protection systems such as seat belts and airbags manufacturers must subject these systems to destructive testing of complete vehicles. The in-service inspection of these systems – whether via random inspections or routine inspections - is, necessarily, limited to checking for the presence of certain items and checking of the warning light systems, which detect faults.

Car park and roadside inspections are flawed through an unsatisfactory selection process, insufficient resources, and the inability to properly examine any vehicle by comparison with properly conducted, formal full vehicle inspections.

Comment

Only NSW and the NT have a program of annual inspections. Regular or annual inspections can only check vehicle condition at one point in time. Random inspections are intended to encourage owners and drivers to maintain their vehicles all year round, rather than just in the lead up to having an inspection conducted (annual inspection prior to registration renewal). As vehicles are subject to an inspection at any time, in a wide variety of locations, random inspections can also address the issue of vehicle deterioration over time. This is a more effective means of inculcating in motorists a culture of continuous compliance than predictable periodic inspections.

Obvious problems which pose a significant safety hazard, for example, bald tyres, can occur at any time during the life of a vehicle and the principal objective of an inspection regime should therefore be to encourage continuous compliance with safety requirements by vehicle owners. Experience has shown a correlation between obvious visible faults and other defects warranting a fuller inspection so random inspections are very cost effective means of applying resources to detect a wide range of vehicle defects. Roadside inspections can screen for additional defects (eg lights, emission problems) as the vehicle is operating.
Road User Services employs officers to provide random on-road and carpark inspections. These officers currently deliver a program of 50,000 random inspections per year. In addition, the AFP conducts periodic campaigns targeting vehicle roadworthiness and is also able to issue defect notices when vehicles are stopped for other purposes, eg random breath testing.

- *Much has been left undone with respect to research in relation to the effectiveness of vehicle inspection programs.*

**Comment**

As noted in the discussion paper, there is a range of research available about vehicle inspections. The “Fosser” study in Norway that compared crash involvement of randomly selected vehicles which had been subject to three different inspection regimes over a four year period could find no discernible differences in the crash involvement of the vehicles. Most recently within Australia, the Victorian Parliamentary inquiry into the Victorian vehicle roadworthiness system found insufficient evidence to support a recommendation to introduce periodic inspections in that State. Previously, similar investigations in South Australia and Queensland reached the same conclusions.

- *Regular inspections (such as in NSW and NT) deal with the true state of fleet deterioration from new, as opposed to the ACT system which ignores this aspect.*

**Comment**

As noted above, the random inspection system adopted by the ACT is directed at ensuring that vehicles are maintained in a roadworthy state for the life of the vehicle. It is clearly concerned with the state of the entire vehicle fleet.

- *Road safety studies are quick to point to other issues as major contributors to accidents (eg speed, alcohol). However, inspection regimes and surveys have found that around 70% of vehicles fail a roadworthy test, and similar ratios could be expected in relation to vehicle accidents with proper examination.*

**Comment**

The discussion paper noted that most vehicle accidents can be attributed to driver error, rather than vehicle defects. Interrogation of the Federal Office of
Road Safety (FORS) fatal files identified that less than 3% of fatal crashes could be attributed to vehicle condition and half of these were related to tyre faults – a type of defect which can be very readily identified in a random inspection of the type undertaken in the ACT.

Current ACT experience is of reducing numbers of crashes, serious injuries and fatalities. The ACT also continues to experience crash rates below surrounding NSW where the regular inspections that the MTA favours are in force.

- **The current inspection regime is not cost effective having regard to the estimated community cost of $95.5 million for crashes involving death or serious injury and a higher level of investment ($13.1m) for mandatory periodic inspections would be more cost effective, because of the extent to which it would reduce serious crashes.**

  **Comment**

  The figure of $95.5 million appears to be a simple calculation of the community cost of all serious injury and fatality crashes, only a small proportion (approximately 5%) of which can be attributed to vehicle defects. The MTA has not provided further evidence that the additional investment in inspections would result in a reduced cost to the community of serious crashes by an amount greater than the additional inspection costs (ie there is no evidence that the ACT would achieve a net financial benefit).

- **The MTA provided a number of examples of poorly maintained vehicles to support its assertions that mandatory periodic inspections should be introduced.**

  **Comment**

  An objective of the ACT’s random vehicle inspection regime is to encourage a culture of continuous compliance by vehicle owners. By vehicles being liable to be inspected at any time, motorists are on notice that their vehicles should be maintained in a roadworthy state.

- **The MTA provided a copy of a survey report from South Australia that claims a 74% support for mandatory inspections, with 22% of those people in favour of annual inspections.**

  **Comment**

  McGregor Tan Research, having been commissioned by the MTA in South Australia, conducted this particular survey report.
The ACT already has mandatory inspections on original registration and at transfer of ownership for vehicles over six years of age, and the survey shows that only 16% (22% of 74%) of people surveyed in SA preferred annual inspections. There is no impediment to any person in the ACT submitting their vehicle for an annual inspection; however there does not appear to be any justification for mandating such a process.

Other submissions

Of those who opposed the proposed recommendations of the discussion paper, most seemed more concerned with environmental issues (exhaust emissions) than vehicle safety. A number of other respondents argued that increased regular inspections would assist in controlling vehicle emissions.

- Suggestion that there is a need for regular inspections to control vehicle emissions, and vehicles modified beyond standard specifications (eg modified exhaust systems).

Comment

Excessive vehicle emissions are taken no less seriously than other vehicle faults and defects. The current inspection and reporting processes are able to adequately identify any gross emitting vehicles. In particular, random on-road inspections are important in screening for emission problems (as was noted by one respondent).

The Australian Design Rules (ADRs) set emission and noise standards for new vehicles. The ADRs are applied in-service through State and Territory regulations. In the case of the ACT they are called up by the Road Transport (Vehicle Registration) Regulations 2000. The ADRs are performance based; however the regulations require emission control equipment to be maintained and require vehicles to not emit excessive smoke.

Vehicle Inspectors check vehicles for the presence of emission control equipment during inspections and check that vehicles do not emit excessive smoke. If a member of the public is concerned about the roadworthiness of any vehicle, they can report the nature of the alleged defect(s) to the Road Transport Authority via a Defective Vehicle Report which can be downloaded from the Road Transport website. Provided sufficient information is given, the vehicle about which the complaint has been made must be produced for inspection.
In terms of vehicle noise emissions, while there have been a number of complaints about noisy vehicles over the years, advice from vehicle inspectors indicates that the level of noise emitted by a noisy vehicle today is less than in the past, i.e. the fleet is getting quieter. This is consistent with a tightening of noise controls through the ADR process.

- **Suggestion that the requirement for inspection on transfer be abolished.**

  **Comment**

  The requirement for inspection on transfer assists in ensuring that a roadworthy check is undertaken when older vehicles change hands. This was introduced, primarily, as a limited consumer protection measure providing some assurance for the purchaser (i.e. establishing that the vehicle is roadworthy). However, it should be recognised that it is the responsibility of the purchaser to seek their own assurance of vehicle condition, for example through a NRMA pre-purchase inspection which can advise more fully on aspects of the vehicle's condition.

- **Concern that roadside inspections are too intrusive and disruptive to the average traveller**

  **Comment**

  On-road random inspections (as opposed to static car park inspections) are a key component of the ACT vehicle inspection process. Having on-road inspections allows checking of some items that are not able to be checked during static car park inspections such as lights, wipers, function of seatbelts, security of seats and whether the park brake works.

  The duration of an on-road inspection where no defect is detected is approximately 2 minutes. Clearly, where a defect is detected during an inspection, the delay to the motorist will be longer, as the inspecting officer and the motorist may have a brief exchange about the matter and the inspecting officer is required to complete paperwork to provide to the motorist in connection with remedying the defect.

  The alternative of regular inspections by authorised inspectors (whether at garages or inspection stations) would also inevitably consume the time of the vehicle owner. For example, the owner would need to book the car in for the inspection and either driver and attend the inspection (possibly after a waiting period), or arrange for another person to attend.
• **Suggestion that an Urban Services email address be available to which complaints about vehicles can be sent.**

**Comment**

This facility is already in place. A client can attach an electronic copy of the Defective Vehicle Report form to an email addressed to Canberra Connect. The Defective Vehicle Report Form is available electronically through the Road Transport and rego.act websites.

If a report is completed with sufficient information and the details of the complainant a vehicle the subject of a complaint is required to be produced for inspection and any faults found are required to be repaired. Details of the complainant are required to assist in eliminating vexatious complaints but, pursuant to privacy legislation, this information is not provided to the owner of the vehicle that has been complained about. Similarly, the complainant is not advised regarding action taken in respect of the vehicle.

• **Support for the proposal for a separate review of registration processes for Veteran, Vintage and Historic vehicles.**

**Comment**

The discussion paper did not address a number of related, but more specific, vehicle inspection issues, including arrangements for veteran, vintage and historic vehicles. It is proposed to review the arrangements for these types of vehicles separately.

**Other Transport Authorities’ Jurisdictions responses**

Only one Transport Authority formally commented on the discussion paper. Transport South Australia supported the recommendations of the paper. In fact, the proposed approach is largely consistent with South Australia’s inspection arrangements.

There is a range of vehicle inspection processes in other jurisdictions (as outlined in the discussion paper), with only NSW and the NT requiring periodic inspections for conventional light vehicles. Discussions at officer level in national vehicle standards forums about the ACT’s proposals, gave rise to no concerns.

**CONCLUSION**

The review of current vehicle inspection arrangements generated a very low level of interest from the Canberra community, suggesting a lack of concern with the
current vehicle inspection arrangements. The few responses received provided a variety of views but in the majority of cases the respondents did not provide any substantive data in support of their preferred position. While the MTA did provide a lengthy submission proposing a return to periodic inspections the arguments it advanced in support of that proposal are not persuasive.

The most recent Australian study of the effectiveness of vehicle inspection regimes has found that those jurisdictions with annual testing schemes have similar defect-related crash rates to those jurisdictions that do not have regular inspections. The majority of Australian jurisdictions, including the ACT, do not require regular/periodic vehicle inspections. The reintroduction of periodic vehicle inspections cannot be demonstrated to deliver any improvement in road safety outcomes. However, there would clearly be costs for vehicle owners associated with the reintroduction of periodic vehicle inspections, including inspection fees and potential loss of earnings associated with taking time off work to submit a vehicle for inspection.

On balance, it is considered that the outcome of the review and consultation process provides no basis for any change from the current ACT system of vehicle inspections.