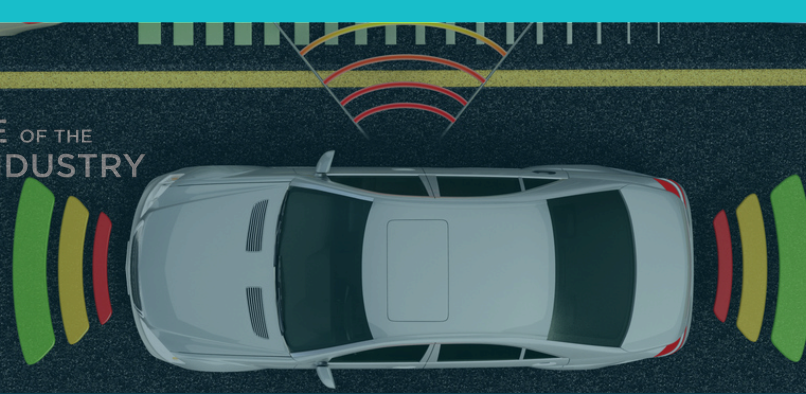




INSTITUTE OF THE
MOTOR INDUSTRY



Executive Summary: the IMI Response to Mandating Vehicle Safety Technologies in GB Type Approval Consultation

About the IMI

The Institute of the Motor Industry (the IMI) is the professional body for individuals working in the UK automotive sector. It sets standards for technical competence in vehicle maintenance and repair and represents a workforce responsible for supporting increasingly complex vehicle systems, including Advanced Driver Assistance Systems (ADAS), electric vehicles and emerging technologies.

Through initiatives such as the IMI TechSafe professional register and workforce research, the IMI works to ensure that technicians are properly qualified to operate safely on safety-critical systems and that the UK has the skills capacity required to support the evolving vehicle parc.

Overview of the consultation

The Government proposes mandating a suite of 18 vehicle safety technologies under the GB type approval framework, aligned to the EU General Safety Regulation (GSR2).

The IMI strongly supports the overall intent, recognising the significant potential to reduce road casualties, with modelling suggesting more than 14,000 deaths and serious injuries could be prevented over 15 years.

However, the IMI emphasises that these benefits depend on systems remaining fully functional throughout the vehicle lifecycle, not just at the point of manufacture.

Safety Impact

The IMI agrees that the mandated technologies will deliver meaningful improvements in road safety, particularly for high-impact systems such as:

- Autonomous Emergency Braking (AEB)
- Intelligent Speed Assistance (ISA)
- Emergency Lane Keeping Systems (ELKS)
- Driver monitoring and distraction warning systems

These technologies have strong casualty reduction potential, but their effectiveness is highly dependent on correct calibration and ongoing maintenance.

Routine repairs such as windscreen replacement, bodywork or suspension adjustments can disrupt system alignment, creating a risk that safety performance degrades over time if not properly addressed.



In-Service Conformity and Workforce Capacity

The IMI identifies a significant gap between type approval requirements and real-world vehicle condition.

- Around 4 percent of the current technician workforce holds ADAS-related qualifications
- Demand for ADAS-capable technicians is projected to increase substantially by 2030
- Current MOT processes do not adequately assess the functionality of many safety systems

This creates a clear risk that mandated technologies will not deliver their intended benefits without parallel action on skills, standards and regulation.

Regulatory Framework

To support effective implementation, the IMI highlights the need for wider regulatory alignment:

- **MOT and roadworthiness:** introduction of functional testing for ADAS systems, not just warning indicators
- **Product safety:** ensuring aftermarket parts and software updates do not compromise safety systems
- **Right to repair:** maintaining independent access to diagnostic, repair and calibration information
- **Cybersecurity frameworks:** ensuring protections do not restrict legitimate maintenance activity

Implementation

The IMI supports the proposed implementation approach, including:

- Initial focus on mass-produced vehicles as a pragmatic starting point
- Timelines broadly aligned with EU requirements
- Limited end-of-stock provisions, subject to clear time and transparency conditions

However, this should be treated as a transitional phase, with a clear roadmap for wider application across vehicle categories.

Key Recommendations

The IMI recommends that Government:

- Introduce functional ADAS checks into MOT and roadworthiness regimes
- Establish clear competence requirements for technicians and testers
- Require digital records of post-repair calibration
- Ensure independent access to repair and calibration information
- Align product safety regulation to prevent degradation of safety systems
- Support workforce development through targeted training and funding
- Maintain alignment with EU regulatory developments