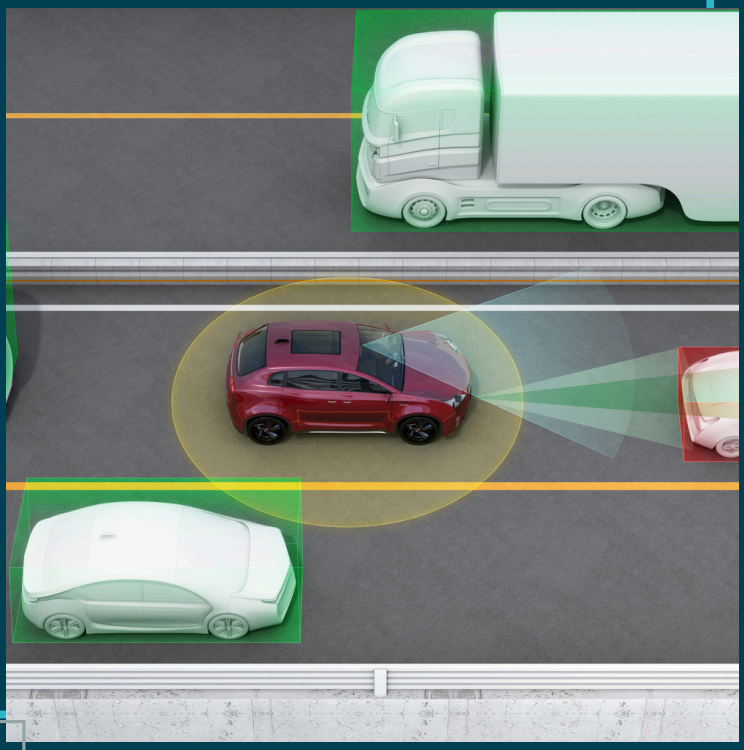
INSTITUTE OF THE MOTOR INDUSTRY



The IMI's Response to the Mandating Vehicle Safety Technologies in GB Type Approval

May 2026

The professional body for people working and learning in automotive since 1920

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About the IMI

The Institute of the Motor Industry is the professional body for the UK automotive sector. We set the standards for technical competence in the maintenance and repair of road vehicles. Through our Professional Register and the IMI TechSafe recognition scheme, we identify the technicians who are qualified to work safely on the safety-critical systems found in modern cars, including Advanced Driver Assistance Systems (ADAS), electric and hybrid powertrains, and hydrogen vehicles. Our research tracks the size of the certified workforce against the technology mix on UK roads.

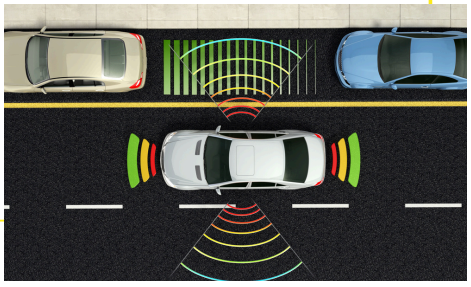
Headline position

The IMI strongly supports the Department's proposal to mandate the GSR2-equivalent suite of safety technologies under the GB type approval scheme. Closer alignment with the EU framework is sensible for industry, simplifies type approval for manufacturers and, most importantly, raises the safety floor for vehicles entering UK service. The casualty case made in the consultation, over 14,000 deaths and serious injuries averted across 15 years, is consistent with our own modelling of the safety contribution of ADAS in the UK fleet.

However, type approval is a one-off event at the factory gate. The safety benefit of these technologies only persists if they are maintained, repaired, and recalibrated correctly throughout the vehicle's in-service life. The IMI's evidence is that the UK does not yet have the certified technician workforce, the regulatory hooks in MOT and roadworthiness, or the consumer protection regime to guarantee that. Without parallel action on competence, calibration and in-service conformity, a meaningful share of the projected casualty saving will be lost between vehicle registration and the first major repair event. Our response to Question 13, therefore, carries the heart of the IMI position.

Do you support or oppose mandating vehicle safety technologies outlined in Table 1 of this consultation? Provide further information to support your answer.

Support. The 18 technologies in Table 1 represent a coherent, evidence-based bundle that has already been tested in the EU framework under GSR2. The Department's casualty savings forecast is credible, and the cost to industry of divergence from the EU standard would, in our view, be greater than the cost of compliance. The IMI's qualification, set out fully in our response to Question 13, is that mandating fitment at type approval is necessary but not sufficient; it must be paired with in-service conformity and a competent repair sector. With that proviso, we strongly support the proposal.



Do you support or oppose the proposed technical requirements outlined in Table 1? If opposed, what modifications will you propose to the technical requirements?

Support, with one modification request. The proposed technical requirements largely mirror UNECE and EU standards, and the IMI does not see a case for GB divergence on the headline specifications. However, we ask the Department to explicitly require, at the technical-requirement level, that systems are designed to permit reliable post-repair recalibration by independent technicians using documented OEM or equivalent procedures. This is not a new technical specification but a scope statement: type approval should not be granted where the manufacturer's system architecture forecloses competent independent repair. This goes directly to 'right to repair' and to the workability of any in-service maintenance regime.

Do you agree or disagree with our proposal not to mandate AIIF technology at this time? Provide further information to support your answer.

Agree, conditionally. The IMI agrees that the evidence base for mandating Alcohol Interlock Installation Facilitation across the GB parc is not yet sufficient to justify a type-approval requirement. We would, however, encourage the Department to keep AIIF under active review and to use the period before any future mandate to develop: (i) a recognised technician competence pathway for installation, calibration and maintenance of alcohol interlocks; and (ii) clear standards on aftermarket installation quality. Without that workforce architecture, a future AIIF mandate would risk the same in-service conformity problems we set out for ADAS.

If the safety technologies were mandatorily implemented on GB type approval, to what effect, if any, do you believe each technology would impact casualty reduction on GB roads?

IMI's overall view is that the casualty modelling underpinning the consultation is reasonable, but it assumes that mandated systems will function correctly throughout the vehicle's life. Our evidence indicates that this assumption is most exposed in camera- and sensor-based ADAS technologies, whose calibration is disrupted by routine repairs. Specifically:

- Intelligent Speed Assistance (ISA): High potential casualty benefit, dependent on speed-limit map quality and on the visibility of the function to MOT testers. Aftermarket recalibration after windscreen replacement is within the scope of competence requirements.

- Autonomous Emergency Braking (AEB): Among the highest casualty-reducing technologies in the bundle. AEB depends on the accurate alignment of forward-facing radar and camera; its calibration is the most common in-service issue we see. Periodic Technical Inspection (PTI) and the MOT must evolve to include functional checks, not only the warning lamp.

- Driver Drowsiness and Attention Warning (DDAW) and Advanced Driver Distraction Warning (ADDW): Material casualty benefit, but cabin-facing cameras are sensitive to alignment, lens condition and software calibration. Repair sector competence requirements should reflect this.

- Emergency Lane Keeping Systems (ELKS): Material casualty benefit. ELKS is the technology most susceptible to miscalibration during alignment, suspension, and bodywork repair. Calibration after windscreen replacement is the highest-volume competence gap in the UK aftermarket.

- Event Data Recorder (EDR): Significant indirect benefit through improved post-collision learning. The casualty effect depends on access protocols for independent repairers, insurers, and vehicle owners under the UK GDPR.

- Tyre Pressure Monitoring System (TPMS) and Reversing Detection (RD): Modest but consistent casualty benefit. It is already partly within the MOT scope; the existing framework is the clear lever.

- Cybersecurity and software update measures (UN R155 / R156): Long-term casualty benefit through resilience of safety functions. The IMI's concern is that cybersecurity gating must not lock independent technicians out of legitimate diagnostic and calibration access.

Do you agree or disagree with mandating these technologies at this time solely for mass-produced vehicles under GB type approval?

Agree, on a transitional basis only. Focusing initial mandating on mass-produced vehicles is pragmatic. Still, the Department should publish a clear timetable for extending equivalent requirements to other vehicle categories, small series, individual approval and non-domestic-type vehicles, so that the UK does not develop a two-tier safety standard within its own parc.

If you disagree, how would you like to change it?

Not applicable, the IMI agrees with the proposal as a transitional measure (see Question 5).

Do you agree or disagree with retaining existing provisions for vehicles built in multiple stages? Provide reasons if you disagree.

Agree. Retaining existing provisions for multi-stage-built vehicles is sensible, given the sector's bespoke nature and the high proportion of SME bodybuilders involved. The Department should, however, ensure that any GSR2-equivalent technology fitted at the base-vehicle stage is not disabled, defeated, or rendered non-functional during the second-stage build. That responsibility for this clearly rests with the second-stage manufacturer, with technician competence requirements to match.

What, if any, other domestic regulations, beyond those already specified, do you believe will require amendment to align with these proposals?

The IMI identifies four domestic regulatory areas requiring concurrent amendment if the casualty benefits forecast in this consultation are to be delivered:

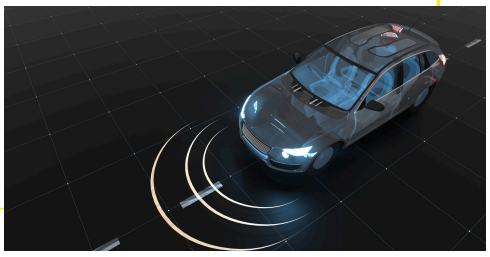
- MOT and roadworthiness (the Motor Vehicles (Tests) Regulations 1981 and DVSA testers' manuals): the MOT inspection methods and tester competence requirements need to be updated to cover the 18 technologies, beginning with functional ADAS checks for camera-based systems.
- Number plate, ANPR and enforcement frameworks (linked to the parallel motoring offences consultation): mandated technologies depend on accurate vehicle identification.
- Product safety and market surveillance (linked to the OPSS/DBT product safety reform consultation): aftermarket parts and software changes must not defeat or degrade mandated safety functions.
- Block exemption and right-to-repair regulation (Motor Vehicle Block Exemption Regulation, MVBER, and MVBEO): independent operator access to repair, diagnostic and software-update information must be guaranteed for mandated systems.

Do you agree or disagree with the proposed timings for implementing these safety technologies?

Agree. The 6-month new-type and up to 24-month new-registration windows (36 months for DIV and EDR, but not before January 2029) are pragmatic and broadly in line with the EU schedule. The IMI sees no benefit to GB lagging the EU on these timings and considerable industry cost in doing so.

If you disagree, what alternative timing would you like to propose for new vehicle types and new vehicle registration after amendments take effect?

Not applicable, the IMI agrees with the proposed timings (see Question 10).



In your view, should manufacturers be allowed to sell remaining stocks of non-compliant vehicles for a specified period after the introduction of these proposals? Provide further information to support your answer.

Yes, but on a strictly limited basis. The IMI accepts that an end-of-stock derogation is a reasonable industry concession to avoid stranded inventory. Still, it should be (i) time-limited (not more than 12 months from the new-type compliance date), (ii) volume-capped, and (iii) clearly disclosed to consumers at the point of sale. Buyers of vehicles registered under any end-of-stock derogation should be made aware that their vehicle does not meet the new GB safety standard.

If, after implementation, future evidence showed vehicle safety features are not consistently retained and maintained, should it become mandatory for operators to do so? Provide further information to support your answer.

Yes, and the IMI's strongest single recommendation to the Department is that the necessary evidence already exists, and the in-service conformity gap should be addressed in parallel with type approval rather than waiting for post-implementation review.

ADAS does not stay calibrated by accident. Lane keep, AEB, adaptive cruise, blind spot monitoring and driver monitoring rely on cameras, radars and inertial sensors whose physical alignment can be disturbed by something as routine as a windscreen replacement, a bumper refit, an alignment adjustment, a suspension repair or a tyre size change. Where a vehicle has been involved in even a low-speed collision, the calibration requirement is non-trivial. The risk to public safety is the gap between what the OEM specifies as the calibration requirement and what is consistently and verifiably delivered in the aftermarket.

The IMI's ADAS TechSafe Technician Forecast (Q3 2025) shows that 11,518 technicians currently hold an ADAS-eligible qualification, accounting for around 4% of the UK technician workforce. Our modelling indicates that minimum demand will rise to approximately 205,000 ADAS-capable technicians by 2030 against a projected supply of around 30,000. The EV TechSafe Technician Forecast points in the same direction: a projected shortfall of more than 44,000 EV-qualified technicians by 2035.

The IMI therefore recommends that the Department's response include, as an explicit policy commitment:

- Phased introduction of functional ADAS checks at MOT, beginning with camera-based systems (lane keep, ISA, AEB), with DVSA-approved test methods.

- A clear competence requirement for repairers and MOT testers working on vehicles with mandated ADAS, aligned to the IMI TechSafe ADAS pathway and recognised in DVSA, MOT and insurance frameworks.

- A duty on repairers to record post-repair calibration outcomes in a digital 'calibration record' visible to subsequent owners, insurers and MOT testers.

- Closer integration with the parallel product safety and market surveillance reform so that aftermarket parts and software changes that defeat or degrade mandated safety functions are caught.

- Workforce funding and apprenticeship support, working with DfE, IfATE and the Industry Training.

Are there any other measures you would like to highlight regarding these proposals?

The IMI highlights three further measures the Department should consider concurrently with this proposal:

- Consumer information: standardised nomenclature for ADAS functions, clear post-repair information for owners, and integration with the V5C and HPI data so that potential buyers can see whether mandated systems have been recalibrated after major repair events.

- SME readiness: any in-service conformity regime must be designed to be deliverable by the SME independent repair sector (approximately 80% of the workforce by establishment), not only by main dealer networks. The IMI is willing to work with DVSA, OPSS and DfT on the practical specification of the required equipment, training and information access.

- International coherence: a clear UK statement that GB will track future EU GSR amendments within a defined window, to give industry, insurers and the repair sector planning certainty.

Do you have any other comments?

The IMI welcomes this consultation as the most consequential vehicle safety regulation in a decade for our sector. We strongly support its passage. Our central message is that the Department should be explicit in its response that mandating safety technologies at type approval marks the start of a programme of regulatory change, not its end. The consultations on penalties for motoring offences, on Euro 7 emission standards, on product regulation reform, and on market surveillance are best understood as a single body of work; the policy decisions taken in each will determine whether the casualty-saving forecast in this consultation is actually delivered on the road.

The IMI would be happy to give evidence to officials, share the underlying TechSafe and ADAS workforce data, and convene a roundtable with the independent repair sector, awarding organisations, and the DVSA on the workforce and in-service conformity questions raised above.

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