AHA Submission: Department for Transport consultation: Mandating vehicle safety technologies in GB type approval

April 2026

The Alcohol Health Alliance UK (AHA) is an alliance of more than 60 non-governmental organisations dedicated to promoting evidence-based policies to reduce the harm caused by alcohol. Members include medical royal colleges, national treatment providers, and charities such as Cancer Research UK. A full list is available online.

The AHA advocates for evidence-based policies to limit the health, social and economic costs associated with alcohol, which includes work to tackle and prevent harms from drink driving.

Question 9: Do you agree or disagree with our proposal not to mandate AIIF [Alcohol Interlock Installation Facilitation] technology at this time? Provide further information to support your answer.

The AHA understands reasoning for the proposal not to mandate Alcohol Interlock Installation Facilitation (AIIF) technology at this time, but feels that this is a missed opportunity to ensure that alcolocks can – in certain circumstances – be more quickly, easily and cost-effectively fitted to vehicles. All new types of vehicle sold within the EU already need to have this AIIF technology fitted (essentially a pre-installed interface allowing standardised ways of connecting an alcohol interlock device to a vehicle) as part of enhanced EU vehicle safety standards.[1] [2]

Given specific questions in the parallel Road Safety Strategy consultation 'Proposed Changes To Motoring Offences' on allowing alcohol interlocks to be used for those convicted of drink driving (*'In your view, should alcohol ignition locks (alcolocks) be allowed to be used as part of a drink drive rehabilitation process?'*), it would in our view be important and forward-thinking to legislate for new vehicles to have AIIF technology installed during manufacture.

Whilst this does not mean full alcolock installation in every single new vehicle, it would ensure that in future they can be fitted to those vehicles far more easily.

DRINK DRIVING OFFENDERS/ REPEAT OFFENDERS

A report by the Parliamentary Advisory Council for Transport Safety (PACTS) found that 17% of drink drive offences are committed by a reoffender.[3] In addition, one study reviewing over 100 million driver records over a 25-year period in the state of Maryland (USA) found that:[4]

- Drivers with one alcohol offence (drink driving conviction) were 6 times more likely to reoffend than drivers with no alcohol offences
- Drivers with two alcohol offences were 10 times more likely to reoffend, and
- Drivers with three or more offences were 15 times more likely to reoffend.[5]

Without more efforts to intervene at the point of a first drink driving offence, these statistics illustrate significant and preventable risks to road users from repeat drink driving offenders.

AIIF technology would enable swifter, more cost-effective action to be taken to fit alcolocks to the vehicles of convicted drink drivers, particularly for a first offence (or later change in vehicle) where the vehicle may not have been adapted historically to allow for alcolock installation.

Current measures allow alcolocks as a voluntary option to reduce or eliminate the time for which someone's license is suspended. However, this may disadvantage people from lower income groups who cannot afford to pay for an alcolock in order to return to driving sooner, leading to inequalities around the take-up of (and benefits from) alcolocks that may depend largely on a driver's socio-economic status.

Implementing mandatory alcolock laws and programmes has achieved impactful reductions in alcohol-related road deaths. One US study compared the 18 US states with mandatory interlock programmes for drink driving convictions with the 32 US states without one (or without a stringent, mandatory one). Findings showed an average 15% reduction in alcohol-related fatalities in the states with mandatory alcolock programmes compared to those states without.[6]

This was estimated to have prevented 0.8 deaths per 100,000 population each year, comparable to the impact of introducing airbags in vehicles (saving 0.9 lives per 100,000 population).[7]

THE ROLE OF AIIF TECHNOLOGY IN REDUCING ALCOLOCK COSTS

When considering proposals to use alcolocks as part of a rehabilitative programme, costs are an important factor, including who bears the cost of the installation, maintenance and calibration of these devices, and over what length of time. This must balance public safety and rehabilitative benefits with ensuring their length of use does not vastly exceed what is needed for best effectiveness (and disproportionately burden drivers with long-term costs).

Retrofitting alcolocks to vehicles without AIIF technology naturally increases installation costs and complexity.[8] As such, a policy of mandatory use for those convicted of drink driving without either some form of subsidy for lower income groups or a mechanism to ensure the installation costs can be kept as low as possible (i.e. by mandating AIIF technology to be fitted to new vehicles), means that any policy change risks further widening inequalities in rehabilitative options for drink drivers. It also means that the public may in practice end up being protected from drink drivers on the basis of driver income rather than driver risk.

A PACTS report from 2021 estimated that interlock installation (retrofitted to a vehicle without AIIF technology installed) could cost a driver in the UK between £1000 and £1500 per year.[9] Whilst we believe offenders should be covering the cost of installing alcolocks in their vehicles, both to act as a further deterrent from drink driving and so that vital public funds are not used to cover these costs, some leniency should be applied for those from lower socio-economic backgrounds. This could be in the form of waiving part or all of the costs, including costs of the unit, installation, or monthly monitoring and calibration.

Providers have shared anecdotal evidence that offenders often choose to keep the alcolock even after their mandatory period has been completed. It may be prudent for the government to cover the cost of this for a time period for people from lower socio-economic backgrounds if the cost would be prohibitive to them doing so. For example, New Zealand provides an alcohol interlock subsidy for people who meet the financial eligibility criteria.[10] Alternatively, countries such as Belgium use models where the cost of the alcohol programme is based on each individual offender's income, rather than being a set cost.[11]

We do still recommend that the Government makes alcolocks a mandatory requirement for those who have been convicted of drink driving to prevent reoffending. However, a decision not to mandate installation of AIIF technology on new vehicles means that the Government must

instead ensure that financial safeguards are in place for the most economically deprived or vulnerable (such as alcohol dependent) drivers.

COST AS A BARRIER TO INTERLOCK TAKE-UP

Cost is frequently cited as a reason individuals choose not to opt to have interlock devices fitted.[12] [13] In one cost-benefit analysis report of alcohol interlocks in Ireland, a review of the literature found a number of key reasons that people opted not to participate in voluntary alcohol interlock programmes.[14] These included:

- Costs of having devices fitted
- Embarrassment of devices being visible in vehicles
- Perceived low risks of getting caught again
- The interlock interfering with alcohol consumption/ drinking occasions, and
- Less or no need to use a car.

Research has shown low numbers choosing to take up interlock programmes following a drink driving conviction,[15] with one meta-analysis finding average participations levels in the US of around 13%,[16] with similarly low rates in early European trials too.[17]

Overall, studies therefore provide compelling evidence that:

a) installation costs are already a significant barrier where offenders can choose between alcohol interlocks and another intervention such as short-term license suspensions,
b) schemes that are voluntary can experience lower take-up rates, and
c) interventions to reduce costs of installing alcohol interlock devices on vehicles in future (such as mandating AIIF technology in new vehicles) would be worth considering to proactively address future costs associated with rolling out interlock devices.

Where cost is a barrier to people choosing interlocks, and where installation is not mandatory, a lower implementation cost may significantly impact on choices and therefore public safety.

ALIGNING WITH EUROPE

From a trading perspective, these changes would align the UK with EU GSR2 safety technologies for specific vehicle categories mandating AIIF technology for new cars, reducing barriers to trade for vehicle sales within Europe.

Whilst the Government intends to introduce mandatory fitting of all other (18 out of 19) EU GSR2 safety technologies, the decision not to include alcohol interlock installation facilitation (AIIF) is concerning. Not bringing in all 19 EU GSR2 regulations – to include AIIF - risks causing future problems and delays for any alcohol interlock programme, creates unnecessary trade barriers, and will see UK vehicle safety lagging behind the EU.

The Society of Motor Manufacturers and Traders recently called for more regulatory alignment between the UK and European automotive sectors given their already heavy integration, which would also reduce overall costs (both in the manufacturing process, and for consumers).[18]

This would have an added benefit of simplifying intra-UK automotive trading (as the EU's new safety regulations for vehicles also apply to cars sold in Northern Ireland under their Brexit agreements), and is something that some UK manufacturers already install anyway to ensure their vehicles are compliant for sale in EU markets.[19]

The GSR2 legislation, which came into force from July 2022, required all new types of vehicle sold in the EU to come with a standardised way of connecting an alcohol interlock device to it.[20] This ensured that alcohol interlock devices that complied with European Standards could be fitted to these vehicles if needed.[21]

This would not be an expensive improvement for the UK to follow suit on. An impact assessment for these EU proposals indicated low costs of installing this technology at manufacture stage. Estimated cost ranges at 2020 price/inflation levels were €1 - €5 per vehicle for M1 and N1* vehicles, and €2 - €6 per vehicle for M2, M3, N2 and N3* vehicles overall.[22] Of the 14 safety technologies covered in this impact assessment, the costs of fitting AIIF technology were found to be the second-cheapest safety technologies for manufacturers to install during production of the vehicle classifications under consideration.

These illustrative costs were separate to any subsequent costs of installing alcolocks within those vehicles, purely representing manufacturer costs for mandatory installation of AIIF technology in these classes of vehicles (estimated development and fixed production costs were included in these estimates and spread equally across vehicles).

**EU classification of vehicle types classifies M1, M2 and M3 vehicle categories as passenger vehicles (varying sizes). N1, N2 and N3 vehicles are classified as vehicles for the carriage of goods (varying sizes)*.[23]

CONCLUSION

We support the Government's proposals to mandate the use of alcolocks for those drivers convicted of a drink driving offence. As such, mandating AIIF technology for new vehicles would in the long term make this significantly quicker, easier, and more cost effective to implement swiftly following a drink driving conviction.

In the meantime, implementation of mandatory alcolocks for those convicted of drink driving must ensure that financial safeguards are put in place for drivers from lower income groups.

As a preventative and rehabilitative tool alcolocks could prove to be a powerful step forwards, helping to protect road users and to reduce repeat drink driving offences (and their resulting harms) as much as possible. Should evaluations of outcomes from this group prove significant, including reductions in repeat drink driving offences and their resulting harms, this would offer further evidence alongside cost benefit analysis to consider a national roll-out of AIIF technology in new vehicles. This would more easily facilitate the installation and use of alcohol interlock devices in the UK in future.

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