



2 December, 2014

Consultation Co-ordinator
Department for Transport
Zone 2/29 Great Minster House
London SW1P 4DR

Direct Dial: 01494 545706
Email: jay@bvrla.co.uk

Dear Sir or Madam,

Consultation to amend The Motor Vehicle (Insurance Requirements) (Immobilisation, Removal and Disposal) Regulations 2011

The BVRLA welcomes the opportunity to comment on the Department for Transport's (DfT) consultation to seek views on proposed new Regulations to amend The Motor Vehicle (Insurance Requirements) (Immobilisation, Removal and Disposal) Regulations 2011.

The BVRLA is pleased that the DfT has recognised that the Regulations needed to be updated and that they are addressing the defects in the 2011 & 2012 Regulations. We agree such practices should be addressed to give our members and their customer's confidence that concerns over registered keeper and legal ownership are being addressed.

We therefore support the proposals to:

- Amend defect elements of the regulations of 2011 & 2012
- Add to present regulations, this will be beneficial to our members in seeking to resolve where ownership resides.

Legislative defect

We would welcome the DfT's support to amend any further legislative defects in addition to those made that may impact our member's ability to be treated as the legal owner of the vehicle. Benefits would include less administration and time spent determining legal ownership. Benefits to our members include less costs and time associated with the loss of vehicles. Benefits to customers and members include a fairer structure when determining legal ownership and custodianship.

Yours faithfully

British Vehicle Rental and Leasing Association

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Transport for London

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A handwritten signature in black ink, appearing to read 'Jay Parmar', is written in a cursive style.

Jay Parmar
Director of Policy & Membership

Bona-fides BVRLA, the industry and its members

- Established in 1967, the British Vehicle Rental and Leasing Association is the UK trade body for companies engaged in the rental and leasing of cars and commercial vehicles. Its members operate a combined fleet of 3.4 million cars, vans and trucks.
- BVRLA members buy nearly half of all new vehicles sold in the UK, supporting around 184,000 jobs and contributing more than £14bn to the economy each year.
- By consulting with government and maintaining industry standards, the BVRLA helps its members deliver safe, sustainable and affordable road transport to millions of consumers and businesses. For more information, visit www.bvrla.co.uk.