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Dear Mr Bailey,

Tyre Labelling Consultation

We welcome the opportunity to comment on the consultation on draft regulation which helps to implement enforcement powers required to supplement the EC Regulation on tyre labelling.

We note the Department's suggested approach of enforcing these requirements through the appointment of a new responsible market surveillance authority and to introduce minimum legislation necessary to support the enforcement of tyre labelling using a risk-based approach.

We support this approach as we believe that the National Measurement Office is best placed to take the role as the market surveillance authority as this is similar to their work in other areas.

BVRLA members operate in excess of 3.3 million vehicles in the UK which accounts for 1 in every 10 vehicles on the road. This means we purchase a large volume of tyres for these vehicles. In some cases these tyres are purchased on behalf of our member's customers therefore the person purchasing the tyres is not necessarily in the garage viewing the labelling.

In these cases the information is provided electronically either on an invoice or on a choice list for the customer. We would welcome clarity from the department that this satisfies the requirements of the legislation.

Specific questions

- 1. Do you consider that the proposed approach to enforcement is an appropriate and proportionate way of enforcing the regulations? If not please explain how you think it could be improved.**

We support the proposed approach and think it is an appropriate and proportionate way to enforce the regulations and will have a minimum impact on businesses.

British Vehicle Rental and Leasing Association

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2. At a later stage the department intends to consolidate and simplify existing tyre related provisions contained within the Motor Vehicle Tyre Safety Regulations 1994 and Road Vehicle Construction and Use Regulations 1986. As a result we wish to understand the financial benefits of simplified and consolidated legislation to your businesses and other organisations. The simplifications judged to provide benefits primarily to those that have to refer directly to the legislation by reducing the amount of time spent reading and understanding it.

(a) Does your business directly read the legislation?

We did when it was first published and issued guidance to our members on the subject.

(b)

i. How many man days per year do you currently spend reading and understanding the current legislation? (e.g. two people spending a week each reading through the legislation would mean 10 man days.)

1 man day including producing any guidance and dealing with queries

ii. How many man days per year do you believe your organisation will save from simplifying the regulations?

½ a man day

iii. What sector is your business or organisation in?

Vehicle rental and leasing

iv. For what reason does your business or organisation refer to the legislation?

As we have mentioned, we referred to the legislation to determine whether or not communicating the tyre labelling regulation would allow communication of the labelling information could occur through invoices or other documentation.

Closing comments

We trust our comments add value to the department's discussions on enforcing the tyre labelling regulations

Yours sincerely



Jay Parmar
Legal and Policy Director

Department of Transport

May 2014

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 3.3 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.