



Car Guide Law Responses
Chartered Trading Standards Institute
1 Sylvan Court
Sylvan Way
Southfields Business Park
Basildon, Essex
SS15 6TH

15 February, 2019

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Dear Sir,

Chartered Trading Standards Institute (CTSI) "Car traders and consumer law: draft guidance for dealerships" Consultation

The BVRLA welcomes the opportunity to comment on the Chartered Trading Standards Institute (CTSI) "car traders and consumer law" draft guidance for second hand car dealers, on behalf of the vehicle rental and leasing sector.

We agree that consumers should be informed if a second-hand car has had multiple users and that the information about the vehicle's history is important to the consumer. We also agree that the guide should not single out purchase of either an ex-rental or lease cars and instead focus on the principle of ensuring consumers are given transparency.

The disclosure requirements that are applied by dealers should cover all types of vehicles which have multiple users, such as demonstrator cars, courtesy cars, pool cars, driving school cars, taxis and cars which have had more than one user within a household. We are therefore pleased that the guide now refers to other examples of vehicles with multiple users, ensuring the reader does not gain an incorrect impression that this disclosure requirement is only applicable to rental or leased vehicles.

As a major buyer of new vehicles (over 50% of all new cars sold each year) and supplier of used vehicles, BVRLA members focus on consumer protection and road safety as a priority. In particular, the rental sector is the main source of nearly new vehicles in the used market and these vehicles are often serviced beyond the required manufacturer standards, with each vehicle undergoing rigorous checks after each rental and before resale. Therefore, a consumer buying an ex-rental vehicle can do so with confidence and reassurance.

British Vehicle Rental and Leasing Association

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To further ensure that vehicles supplied into the used market exceed the standards for resale, the BVRLA has a Fair Wear and Tear Guide – an industry-wide, accepted standard that defines fair wear and tear on passenger cars when they are returned to a leasing company. The guide also provides advice for best practice in vehicle maintenance and upkeep that will prevent unacceptable wear and tear from occurring. It also defines the industry standard at return for every aspect of the vehicle's condition. It is also important to emphasise that all BVRLA members adhere to our Code of Conduct that requires them to maintain the highest industry standards of professionalism and best practice – thereby giving consumers additional reassurances.

Finally, the BVRLA believes that greater consumer education may be useful to support those choosing a used vehicle. This is required to correct the misconception that ex-rental vehicles and other examples of vehicles with multiple users are not a good choice for a used vehicle – which as we have demonstrated in our response to the consultation is untrue. We would recommend that the CTSI does more to increase the transparency of the benefits for a consumer of purchasing an ex-rental vehicle.

I trust that our comments are helpful, and we would be happy to provide any additional information, if necessary.

Yours faithfully,



Jay Parmar
Director of Policy and Membership

Bona-fides BVRLA, the industry and its members

- Established in 1967, the British Vehicle Rental & Leasing Association (BVRLA) is the UK trade body for companies engaged in vehicle rental and leasing.
- BVRLA membership provides customers with the reassurance that the company they are dealing with adheres to the highest standards of professionalism and fairness.
- The association achieves this by maintaining industry standards and regulatory compliance via its mandatory codes of conduct, inspection programme and conciliation service. To support this work, the BVRLA shares information and promotes best practice through its extensive range of training and events.
- On behalf of its 90+ members, the BVRLA works with governments, public sector agencies, industry associations and key business influencers across a wide range of road transport, environmental, taxation, technology and finance-related issues.
- BVRLA members are responsible for a combined fleet of almost five million cars, vans and trucks, supporting around 465,000 jobs and contributing £49bn to the economy each year.