

To whom it may concern.

I am writing to you on behalf of the Vehicle Recyclers' Association, with regards to your currently open public consultation on block exemption.

The vehicle recycling sector handles approx. 2 million end of life vehicles every year, employs over 35,000 people at over 2,500 facilities nationwide and sells more than GBP300 million per year of reclaimed OE spare parts (for direct reuse in vehicle repairs), playing a key role in delivering a circular economy model for reclaimed car parts & recycled materials.

We have not previously engaged with Government on the matter of block exemption.

I have no significant knowledge of block exemption other than I understand it is supposed to prevent anti-competitive business practices.

As such, I am not able to respond in detail to the consultation, specifically the questions posed in it.

However, we are concerned that restrictive practices continue to be used to prevent much of our (& the wider aftermarket) sector accessing technical vehicle parts data. And we believe that with 'coding' of parts this is getting worse. This is one of the largest threats to the continued existence & further establishment of the reclaimed OE parts sector.

We would like to draw your attention to the previous submission of UK AFCAR (of which we are not members, but with which we can find little to disagree) regarding the concerns of the independent aftermarket about MV-BER.

Kind regards

Charles Ambrose (Chas)
Association Secretary
Vehicle Recyclers' Association,