

Via email to: mvberreview@cma.gov.uk
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Competition and Markets Authority
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Date: 16.05.2023

Dear Competition and Markets Authority,

RE: motor Vehicle Block Exemption Order (KIVBEO)

We are responding on behalf of LKQ Euro Car Parts, the UK's leading distributor of independent car parts with around 9,000 employees and over 280 branches across the UK and Ireland, who serve over 35,000 independent garages.

As a business, we have inputted into and support the submissions of UK AFCAR and SMMT.

Overall, we welcome the revisions and additions that the guidance covers, but in order to try to reduce ambiguity or ensure sufficient emphasis is given to key points we suggest the following:

Clause 4.& - Captive Ports

Independent distributors should be able to qualify to be part of the selective distribution system for OEM brands to ensure ease of access, availability and access to OEM parts for independent workshops. We consider that this also would also support the 'agency model' requirements for dealers that may handle multi – brand repair and maintenance work.

Clause 5.& onwards

Whilst the section covers parts identification, we suggest that it should specifically define the access and use of electronically processable data for multiple vehicles (i.e. in bulk) to ensure that an independent parts distributor can ensure the correct parts are quickly and accurately identified, emphasising that the independent repairer/consumer should have a 'one stop shop' when sourcing the parts needed.

Clause 5.25

Ideally the access criteria should be included in the notion of technical information, which should be extended to include direct remote access to support independent diagnostics, prognostics and access to allow repair and maintenance notifications to be displayed to the driver.

5.25, 5.28 and 5.29 covering access to software

It is not clear on the mechanism required by independent operators to access and download software codes or updates, especially for small independent workshops. So, in 5.26, we would propose that it specifically mentions warehousing options (independent parts wholesalers) and aggregators (application data providers) but also suggest there could be an 'industry standard licence agreement' to allow a standardised industry set of conditions to apply.

Clause 5.79

The point should be made clearer and extended to reference independent parts distributors.

If you require any additional information, please feel free to get in touch.

Yours sincerely

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Andy Hamilton
Group Chief Executive Officer
LKQ Euro Car Parts