

Swinton response to PMI formal consultation on modified draft order

I refer to the further consultation issued on 27 February 2015 on the draft order to implement the remedies contained in the Private Motor Insurance Final Report. You requested submissions on the Modified Draft Order by 9 March 2015. I note that the principal modification to the previous draft order relates to the implementation date of the obligation to provide information about NCB protection (asset out in Article 3 of the Draft Order) and extends the implementation time for that part of the Order from 1 September 2015 to 1 August 2016.

Swinton supports and endorses the proposal to extend the deadline for implementation of the Order and is grateful to the CMA for having taken into account its submissions (as set out in its submission of 6 February) as well as the submissions of others in the industry in relation to the implementation date. As noted in its submission, Swinton believes that there are a number of difficulties which will need to be overcome in order to ensure comprehensive implementation of the proposals by all brokers. Those difficulties are being addressed partly, although not entirely, at industry level. Swinton understands that the current estimated deadline for full implementation by the industry body is 1 October 2016. In view of that estimate, Swinton would respectfully request that the CMA consider extending the deadline for implementation from 1 August 2016 until 1 October 2016.