



Reform of Consumer Law draft regulations: proforma for additional comments by 11 October 2013

We welcome any further comments on the draft Regulations. If you would like to comment, please complete this form.

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Please return completed forms to:

Consumer Bill Team
Consumer and Competition Policy
Department for Innovation and Skills
1 Victoria Street
London
SW1H 0ET

Or email: consumerbill@bis.gsi.gov.uk

Please tick a box from the list of options that best describes you as a respondent.

<input checked="" type="checkbox"/>	Business representative organisation/trade body
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	Charity or social enterprise
	Individual
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	Legal representative
	Local Government
	Medium business (50 to 250 staff)
	Micro business (up to 9 staff)
	Small business (10 to 49 staff)
	Trade union or staff association
	Other (please describe)

Comments

Please use this table for any comments that you may have on the draft Regulations.

Proposed Measures	Comments on the Draft Regulations
Consumer Protection from Unfair Trading (Amendment) Regulations	Please note the comments made by ICBA's sister organisation, ARLA.
Consumer Contracts (Information, Cancellation and Additional Payments) Regulations	<p>The Cancellation of Contracts Made in a Consumer's Home or Place of Work etc. Regulations (2008) do not apply to the rental of any immovable property. We note the proposal to narrow this exemption to residential property only, which would mean that cancellation would apply to the rental of commercial property.</p> <p>See the response submitted by ARLA in respect of landlords being categorised as consumers or traders. This confusion also applies to commercial landlords. It is possible for commercial landlords to be consumers, e.g. landlords of commercial property may have invested in commercial property as part of their pension plan [or other long term saving]. Tenants of commercial property are likely to be traders because they will have rented the space for commercial reasons. In these circumstances, will consumer</p>

	landlords benefit from the rights and protections bestowed by the new regulations (right to cancel)? Will trader tenants have enhanced obligations (provision of information)? This reversal cannot have been the intention behind the Consumer Rights Directive.
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Thank you for taking the time to provide feedback on the draft Regulations. We do not intend to acknowledge receipt of individual responses unless you tick the box below.

Please acknowledge this reply

At BIS we carry out our research on many different topics and consultations. As your views are valuable to us, would you be content if we were to contact you again either for research or to send through consultation documents?

Yes

No

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