



## MOTOR INSURERS' BUREAU OF IRELAND

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Regd. in Ireland. No. 15861  
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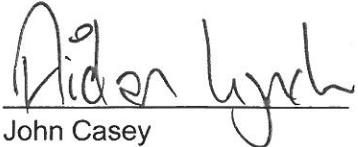
### **Re: Public consultation on the operation and implementation of the PIAB Acts 2003 & 2007**

Dear Minister,

I refer to your letter dated 19 June 2014 in relation to the subject and would like to make the following comments and submissions on behalf of the Motor Insurers' Bureau of Ireland.

1. The MIBI fully supports the aims and objectives of the PIAB Acts and the operations of the Injuries Board (IB) and the points below are put forward to enable a more effective implementation of the Acts.
2. The MIBI is responsible for compensating innocent victims of road accidents caused by uninsured and unidentified vehicles. By definition, drivers of such vehicles are usually uncooperative and irresponsible, are often unrepentant and tend to hold their victims in contempt. It can be very difficult and time consuming to locate and deal with these drivers and the 3 month time frame permitted to respond to an IB Formal Notice can impose a very tight deadline for investigation. An extension of the time frame to 5 months could significantly assist in the task of accurate and appropriate assessment of cases, especially where there may be indications of suspicious accident circumstances.
3. Similarly where MIBI is named as a Respondent where the alleged offending vehicle is from outside this jurisdiction delays can occur during the investigation of the insurance position which may make it difficult for a response to be made to the Formal Notice within the 3 month deadline and an extension in these circumstances to 5 months would permit a more thorough investigation and informed response.
4. Substantial charges are incurred by Claimants who very frequently fail to attend medical appointments and these are invariably payable by the Respondent. Such costs should instead be deducted from any IB award to the Claimant. Similarly there are no sanctions due to non-compliance and a lack of engagement by both claimants and respondents with the process.
5. A lack of adequate information can result in claims being removed from the Injuries Board process and as such should the legislation be amended to impose a duty of disclosure on all parties.
6. Would the Minister see the merit in introducing a more defined timeline for the management of claims during the Injuries Board process.

Yours sincerely

p.p.   
John Casey  
CEO