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To: <conspol@djei.ie>,
Date: 10/07/2014 14:57
Subject: Consultation paper -EU Directive on Consumer Alternative Dispute Resolution

The Car Rental Council of Ireland is the representative trade association for the car rental industry in Ireland and includes all the major car rental companies in its membership. The Council is affiliated to the Irish Tourism Industry Confederation and the European car rental representative organisation, Leaseurope.

The Council operates a car rental complaint service, which assists in the resolution of disputes between member companies and their customers. Some of these complaints are referred to the Council by Failte Ireland and the European Consumer Centre and primarily deals with overseas based customers.

We refer to the [consultation paper on the implementation of the EU Directive on Consumer Alternative Dispute Resolution](#) and wish to make the following observations:

Q6: In the context of our affiliation to the European car rental organisation the industry here in Ireland may link up with the European Car Rental Conciliation Service (www.ecrcs.eu) as an ADR body and request that national legislation makes provision for this eventuality.

Q7&Q8: Both the Car Rental Council and the ECRCs are funded by the industry and as consumer's rights to judicial processes are not denied under the provisions of the EU Directive, our industry believes these schemes should not be precluded under national legislation.

Q9&Q10: Based on our experience in handling complaints our industry believe the exemptions provided for in Article 5(4) of the EU Directive are soundly based and supports the inclusion of all of these in national legislation. We also recommend the exclusion of any dispute with a claim value less than €50.

Q11: The ADR services can be provided free of charge to consumers provided that the industry is not required to incur additional costs associated with complex ADR schemes or deal with disputes with a claim value less than €50.

Q12&Q13: In the commercial world, regulatory non-compliance normally results in unfair competition. We therefore advocate that national legislation provides for mandatory compliance by all traders in our industry which should include all third party brokers and agents selling car rental services in the Irish market. Likewise the decisions of the ADR should be binding on all traders.

Regards,

Paul Redmond
Chief Executive

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