

# Consumer Law Bulletin

**Bulletin Editor**

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## ENFORCEMENT

### NEW LEGISLATION

***The Tribunals, Courts and Enforcement Act 2007 (Consequential, Transitional and Saving Provision) Order 2014***

This Order makes consequential amendments in other subordinate legislation, together with transitional and saving provisions as a result of the implementation of Pt 3 of the Tribunals, Courts and Enforcement Act 2007. This Act provides for the replacement of various powers of enforcement by way of execution and distraint by a procedure in Sch 12 of the 2007 Act. (The Sch 12 procedure.)

The Schedule to these Regulations amends or revokes subordinate legislation that contains provision about the exercise of powers, which are replaced by the power to use the Sch 12 procedure. In addition, transitional and saving provision is made as follows.

Provision is made for references to powers replaced by the power to use the Sch 12 procedure.

References to certain warrants or writs which have been renamed by the 2007 Act as warrants or writs of control, and references to bailiffs, to operate as references to the Sch 12 procedure or power to use that procedure have been changed.

Provision is additionally made for certain types of enforcement action, undertaken before commencement of Pt 3 of the 2007 Act.

Provision is further made to ensure that regulations treated as if made under s 83 of the Traffic Management Act 2004 continue to have effect notwithstanding the repeal by the 2007 Act of the section under which they have effect.

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### *The Legislative and Regulatory Reform (Regulatory Functions) (Amendment) Order 2014*

This Order amends the Legislative and Regulatory Reform (Regulatory Functions) Order 2007, which specifies the regulatory functions to which the duties in ss 21 and 22 of the Legislative and Regulatory Reform Act 2006 apply.

Section 21 of the Act imposes a duty on any person exercising a specified regulatory function to have regard to the five principles of good regulation. The principles provide that regulatory activities should be carried out in a way that is transparent, accountable, proportionate and consistent and should be targeted only at cases in which action is needed.

Section 22 of the Act enables a Minister of the Crown to issue a Code of Practice relating to the exercise of regulatory functions (the 'Regulators' Code'). This section imposes a duty on any person exercising a specified regulatory function to have regard to the Regulators' Code when determining general policies or principles by reference to which that person exercises those functions.

Article 2(2) of this Order extends the duties under ss 21 and 22 of the Act to all the regulatory functions exercised by the Groceries Code Adjudicator and the Regulator of Community Interest Companies.

Article 2(4) of this Order also extends the duties under ss 21 and 22 of the Act to regulatory functions concerning claims management services, which are exercised by a Minister of the Crown under Pt 2 of the Compensation Act 2006.

Article 2(3) of this Order updates Pt 1 of the Schedule to the 2007 Order by removing reference to: the Hearing Aid Council; the Postgraduate Medical Education and Training Board; and the United Kingdom Sports Council.

## NEW EU LEGISLATION

On 29 March 2014, the European Commission published the recasts of eight directives. These directives have new reference numbers and are aligned with the rules and responsibilities for CE marking that were published earlier in Decision 768/2008/EU. The Directives are:

- EMC Directive (2014/30/EU) (previously 2004/108/EC): Directive 2014/30/EU of the European Parliament and of the Council of 26 February 2014 on the harmonization of the laws of the Member States relating to electromagnetic compatibility.
- Low Voltage Directive (2014/35/EU) (previously 2006/95/EC): Directive 2014/35/EU of the European Parliament and of the Council of 26 February 2014 on the harmonization of the laws of the Member States relating to the making available on the market of electrical equipment designed for use within certain voltage limits.

- ATEX Directive (2014/34/EU) (previously 94/9/EC): Directive 2014/34/EU of the European Parliament and of the Council of 26 February 2014 on the harmonization of the laws of the Member States relating to equipment and protective systems intended for use in potentially explosive atmospheres.
- Civil Explosives (CIVEX) Directive (2014/28/EU) (previously 93/15/EC): Directive 2014/28/EU of the European Parliament and of the Council of 26 February 2014 on the harmonization of the laws of the Member States relating to the making available on the market and supervision of explosives for civil uses.
- Simple Pressure Vessels Directive (2014/29/EU) (previously 2009/105/EC): Directive 2014/29/EU of the European Parliament and of the Council of 26 February 2014 on the harmonization of the laws of the Member States relating to the making available on the market of simple pressure vessels.
- Non-Automatic Weighing Instruments Directive (2014/31/EU) (previously 2009/23/EC): Directive 2014/31/EU of the European Parliament and of the Council of 26 February 2014 on the harmonization of the laws of the Member States relating to the making available on the market of non-automatic weighing instruments.
- Measuring Instruments Directive (2014/32/EU) (previously 2004/22/EC) Directive 2014/32/EU of the European Parliament and of the Council of 26 February 2014 on the harmonization of the laws of the Member States relating to the making available on the market of measuring instruments.
- Lifts Directive (2014/33/EU): Directive 2014/33/EU of the European Parliament and of the Council of 26 February 2014 on the harmonization of the laws of the Member States relating to lifts and safety components for lifts.

These new directives are in effect as of 19 April 2014 and Member States have until 20 April 2016 to amend their national legislation, which is when the old directives will be repealed.

Manufacturer CE Declarations of Conformity (DoC) can start referencing the new directive numbers when they enter into force later this month. By 20 April 2016 the new numbers are required for products that fall within the scope of these directives and which are made available for the first time.

The directive recast was undertaken to align with the European Commission New Legislative Framework (NLF). Adopted in 2008, the NLF was designed to:

- Require traceability within the supply chain.
- Improve market surveillance rules.

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- Boost the quality of conformity assessment through more stringent requirements imposed on conformity assessment bodies and testing laboratories.
- Install tighter controls on the use of the ‘CE Mark’ to enhance its credibility.

## INFORMATION

### *Regulators’ Code*

The Regulators’ Code came into statutory effect on 6 April 2014 under the Legislative and Regulatory Reform Act 2006, replacing the Regulators’ Compliance Code. It provides a clear, flexible and principles-based framework for how regulators should engage with those they regulate.

Nearly all non-economic regulators, including local authorities and fire and rescue authorities, need to have regard to it when developing standards, policies or procedures that either guide their regulatory activities with business or apply to other regulators.

The Regulators’ Code is the same document that was published in July 2013 ahead of its statutory implementation. This was to allow time to review existing practices and procedures for regulators covered by the Code.

### *National Audit Office: Update on Consumer Protection Landscape Reforms*

#### **New consumer protection landscape**

In the new consumer protection landscape, the Department for Business, Innovation and Skills still has overall responsibility for consumer policy and allocates funding to various organisations for consumer protection activities. However, large changes have been made to other consumer protection landscape arrangements.

#### **Competition and Markets Authority (CMA)**

The Office of Fair Trading (OFT) and the Competition Commission (CC) ceased to exist at the end of March 2014. A new body, the CMA, was created under the Enterprise and Regulatory Reform Act 2013, to take on most of the functions of the OFT and CC. The CMA became fully operational on 1 April 2014.

The CMA’s consumer role aims to complement and reinforce the action it takes to improve competition in markets and support economic growth, by addressing problems where competition enforcement alone does not, or cannot, make a market work well for consumers. The CMA, therefore, generally focuses on cases with market-wide implications.

#### **Trading Standards Services (TSS)**

TSS provides officers who work for local authorities. They are responsible for safeguarding the interests of consumers and businesses by enforcing legislation on environmental health, licensing and unfair trading.

In the new consumer protection landscape, TSS continues to enforce a range of consumer protection legislation locally and regionally. From 1 April 2013, TSS also became largely responsible for enforcing consumer law at the national level.

In addition, in April 2014, TSS became responsible for regulation of estate agents in relation to the operation of the negative licensing system and approval of estate agents redress schemes.

### **National Trading Standards Board (NTSB)**

The NTSB was created in April 2012 to provide leadership and support to TSS in enforcing consumer protection. This board consists of experienced Trading Standards officers who represent TSS across England and Wales.

### **Citizens Advice**

Citizens Advice is an independent charity that, with Citizens Advice Scotland and Citizens Advice Northern Ireland, provides financial, legal and consumer advice across the UK. In April 2012, it took over running the government-funded consumer advice function, including the call centre Consumer Direct.

Since April 2014, Citizens Advice has the responsibility for coordinating consumer education and advice.

### **Risks and benefits**

The consumer protection landscape reforms aim to reduce complexity, strengthen the effectiveness of consumer rights enforcement, and ensure that activities to empower consumers are delivered cost effectively.

The NAO has looked at the potential benefits as well as the possible risks that the objectives will not be realised.

The NAO believes potential benefits include:

- A reduced number of consumer organizations.
- Better regional coordination of consumer enforcement.
- Improved communication between organisations through partnership arrangements.

The NAO has found the possible risks to consumers and taxpayers include the cost of the reforms and the potential loss of some consumer protection functions, as well as the complexity resulting from:

- Mechanisms to ensure value for money.
- Accountability and transparency arrangements.

### ***The 'Blue Guide' on the Implementation of EU Product Rules***

The Guide to the implementation of directives based on the New Approach and the Global Approach (the 'Blue Guide') was published in 2000. Since

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then, it has become one of the main reference documents explaining how to implement the legislation based on the New Approach, now covered by the New Legislative Framework.

Much of the 2000 edition of the 'Blue Guide' is still valid but it requires updating to cover new developments and to ensure the broadest possible common understanding on implementation of the New Legislative Framework (NLF) for the marketing of products. It is also necessary to take account of the changes introduced by the Lisbon Treaty (in force since 1 December 2009) with regard to the legal references and terminology applicable to EU-related documents, procedures, etc.

This new version of the Guide will therefore build on the past edition, but include new chapters, for example on the obligations of economic operators or accreditation, or completely revised chapters such as those on standardisation or market surveillance.

The Guide has also been given a new title reflecting the fact that the New Legislative Framework is likely to be used, at least in part, by all types of Union harmonisation legislation and not only by the so-called 'New Approach' directives.

## FOOD

### NEW LEGISLATION

#### *The Food Hygiene (Scotland) Amendment Regulations 2014*

These Regulations implement Commission Regulation (EU) No 216/2014 amending Regulation (EC) No 2075/2005 laying down specific rules on official controls for *Trichinella* in meat.

They also implement Commission Regulation (EU) No 218/2014 amending Annexes to Regulations (EC) No 853/2004 and (EC) No 854/2004 of the European Parliament and of the Council and Commission Regulation (EC) No 2074/2005, which removes the requirement for a special health mark and the restriction to the national market for emergency slaughter meat.

These Regulations implement Commission Regulation (EU) No 218/2014 by amending the Food Hygiene (Scotland) Regulations 2006 to revoke reg 32A (special health mark) and Sch 6A (the special health mark) (reg 2(2) and (4)).

#### *Transfer of Functions (Food) (Wales) Regulations 2014*

These Regulations, which apply to Wales, amend the Medical Food (Wales) Regulations 2000, the Notification of Marketing of Food for Particular Nutritional Uses (Wales) Regulations 2007, the Nutrition and Health Claims (Wales) Regulations 2000, and the Infant Formula and Follow-on Formula (Wales) Regulations 2007, by transferring nutrition functions under each set of regulations from the Food Standards Agency to the Welsh Ministers.

## INFORMATION

### *Food law–Code of Practice (England)*

The Food Safety Act 1990, gives the Secretary of State the power to issue a Code of Practice concerning the execution and enforcement of food safety legislation by food safety authorities. Food authorities that do not have regard for the Code could find their decisions are successfully challenged, and evidence gathered during their investigations ruled as inadmissible in a criminal court.

This Code of Practice applies to food authorities acting in England.

### *Changes*

The most significant changes to the Code of Practice include:

- The clarification of the descriptors used to rate and assign intervention frequencies at food establishments.
- Greater focus on businesses with persistent or serious non-compliances by reducing the frequency of interventions in those businesses with good management controls.
- A reduction in dual enforcement in a small number of establishments currently subject to both Food Standards Agency and Local Authority control.

### *Press Release: Two Charged Over the Mislabelling of Goat Meat*

Two individuals and a company have been charged in relation to alleged mislabelling of goat meat products intended for sale. This follows a joint investigation by the Food Standards Agency, Dyfed Powys Police and Ceredigion Council.

The allegations are that Dafydd Raw-Rees and Colin Patterson, the owner and company representative of Farmbox Meats Ltd in Aberystwyth mislabelled goat meat as either lamb or mutton for the purposes of sale.

## SAFETY

### NEW LEGISLATION

#### *Aerosol Dispensers (Amendment) Regulations 2014*

These Regulations amend The Aerosol Dispensers Regulations 2009 to effect the changes brought about by the Regulation (EC) No 1272/2008 on the classification, labelling and packaging of substances and mixtures.

Regulation 4 provides for transitional provisions in relation to the requirements for the marking of aerosol dispensers containing a mixture and placed on the market before 1 June 2015.

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#### NEW LEGISLATION

##### *The Renewables Obligation (Amendment) Order 2014*

This Order amends the Renewables Obligation Order 2009 and makes transitional provision.

The 2009 Order imposes an obligation on electricity suppliers that supply electricity in England and Wales. Suppliers must produce, by a specified day, a certain number of renewables obligation certificates (ROCs) in respect of each megawatt hour of electricity that each supplies during a specified period known as an obligation period.

The Gas and Electricity Markets Authority who issue ROCs to renewable electricity generators in respect of their eligible renewable output administer the renewables obligation.

Article 2 amends some of the definitions in art 2 of the 2009 Order and adds some new definitions, including for Contracts for Difference (CFD), 'excluded capacity', 'investment contract' and 'RO eligible renewable output'.

Article 4 substitutes art 17AB of the 2009 Order, and art 5 inserts arts 21A and 21B into the 2009 Order, to widen the cases and circumstances in which ROCs must not be issued, where a station generates electricity using excluded capacity or where a CFD or investment contract applies to the electricity or to a combustion unit.

Article 6 inserts art 23A into the 2009 Order, to give the meaning of 'RO input electricity', 'RO output electricity' and 'the generation of electricity from an ineligible renewable source'.

Article 7 amends art 24 of the 2009 Order to set out additional circumstances in which ROCs are to be issued in respect of a proportion only of the electricity generated by a station.

Article 8 substitutes art 25 of the 2009 Order. This sets out how the RO eligible renewable output of a generating station is to be calculated, and how it is to be apportioned when two or more types of generating capacity generate in two or more ways or electricity.

Article 13 amends art 54 of the 2009 Order, which sets out information to be provided where electricity is generated from biomass.

Article 13(2) widens the types of biomass to which art 54 of the 2009 Order applies. Article 13(3) changes the date by which the information must be provided and changes the nature of some of the information requirements.

Article 13(5) adds a new restriction on the circumstances in which the default value method can be used to calculate the greenhouse gas emissions from the use of biomass.

Article 13(8) omits the definition of 'environmental quality assurance scheme' and inserts some new definitions.



Article 14 amends art 54A of the 2009 Order, which relates to the bioliquid sustainability audit report and which implements, in relation to the renewables obligation.

Article 14(2) changes some of the requirements that must be met by a bioliquid sustainability audit report.

Article 14(4) inserts a definition for ‘environmental quality assurance scheme’.

Article 19 amends art 58A of the 2009 Order to require certain declarations to be made by the operator of the generating station before an offshore wind turbine can be registered under that article.

Article 20 inserts art 58B into the 2009 Order to create a procedure for the registration of additional capacity at an accredited generating station.

***Domestic Renewable Heat Incentive Scheme Regulations 2014***

These Regulations, which apply to Great Britain, establish a renewable heat incentive scheme (‘the scheme’) under which owners of biomass plants, heat pumps and solar thermal plants which generate heat for domestic properties may receive payments at prescribed rates (‘tariffs’) when the plant generates heat for that property.

Part 2 set out the criteria that must be met before a plant is eligible to participate in the scheme.

Part 3 (regs 17–22) sets out the procedure for applying for accreditation for a plant, the powers of the Gas and Electricity Markets Authority (‘the Authority’) when considering an application, relevant time limits, the circumstances in which accreditation must, or must not, be given and provides for accreditation to be given subject to conditions.

Part 4 (regs 23–25) sets out the procedure for making an application for authorisation of a metering arrangement and confers powers on the Authority when considering an application and deciding whether to give authorisation.

Part 5 (regs 26–32) confer on the Authority the function of making payments (‘RHI payments’) to owners of accredited plants (‘participants’) and sets out how those payments are calculated. Regulation 26 requires the Authority to make RHI payments and provides that RHI payments accrue for seven years from the date of the application for accreditation.

Part 6 (regs 33–38), and Schs 5 and 6, provide for the determination of the tariff applicable for a plant for the purposes of the calculations in regs 27 and 28.

Part 7 (regs 39–44) sets out ongoing obligations with which participants must comply, including requirements to give annual declarations, to provide information and to notify the Authority of any relevant change in circumstances.

Part 8 (regs 45–48) sets out the procedures applicable in the event of a change of circumstances affecting accreditation of a plant or whether the plant must

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be metered and provides for the Authority to review accreditation and authorisation of any metering arrangement where necessary.

Part 9 (regs 49–55) sets out the procedure for registration of any metering and monitoring agreement, which relates to an accredited plant and which meets the requirements in Sch 7.

Part 10 (regs 56–62) sets out the provisions in relation to enforcement.

Part 11 (regs 63–64) confers functions on the Secretary of State in relation to the review of the scheme.

Part 12 (regs 65–70) confer additional administrative functions on the Authority, including duties to maintain a central register of accredited plant and registered metering and monitoring agreements, to publish guidance and to provide information to the Secretary of State.

Part 13 (regs 71–72) makes miscellaneous provision. Regulation 71 describes the form and method of communication of notices, notifications and applications under these regulations. Regulation 72 amends the 2011 Regulations to prevent a plant, which is accredited, or for which accreditation has been sought, under this scheme from also obtaining accreditation under those regulations.

### ***Carrier Bags Act (Northern Ireland) 2014***

The Act amends SR 2013/4 to introduce the second phase of the charging regime, which will apply the minimum charge to a wider range of carrier bags, including the cheaper versions of reusable carrier bags. The Act specifies the dates on which the new charging arrangements will come into force.

It also makes amendments to the Climate Change Act 2008 which, extend the Department of Environment's ability to make specific provision for sellers. The amendments also provide for changes to record keeping and payment arrangements including a requirement to pay interest to the Department in the event of late payment of the proceeds of the minimum charge and strengthen the Department's enforcement powers.

The Act also requires the Department to carry out a review of the carrier bag charging arrangements and provides specifically for an ad hoc review of exemptions to the charge. In addition, the Department must prepare a report on biodegradable carrier bags, which must consider the need for any exemptions from the carrier bag on grounds of biodegradability and how any such exemptions should be defined and implemented.

## FAIR TRADING

### NEW LEGISLATION

#### ***The Public Bodies (Abolition of the National Consumer Council and Transfer of the Office of Fair Trading's Functions in Relation to Estate Agents Etc) Order 2014***

This instrument abolishes the National Consumer Council and transfers relevant functions to the National Association of Citizens Advice Bureaux

(‘Citizens Advice’) and the Scottish Association of Citizens Advice Bureaux (‘Citizens Advice Scotland’). Functions of the National Consumer Council relating to consumer matters in Northern Ireland for postal services are transferred to the General Consumer Council for Northern Ireland (GCCNI). The abolition and the transfer of functions is to take place on 1 April 2014.

The instrument also transfers certain functions, which relate to a consumer advice scheme from the Office of Fair Trading (OFT) to Citizens Advice and Citizens Advice Scotland. This transfer also takes effect on 1 April 2014.

In addition the order transfers the functions of the OFT in relation to the regulation of estate agents. The OFT’s functions in the Estate Agents Act 1979 are transferred to a lead enforcement authority and the OFT’s functions as the supervisor of estate agents in the Money Laundering Regulations 2007 are transferred to the Commissioners of Her Majesty’s Revenue and Customs (‘the Commissioners’). This transfer of functions is to take place on 31 March 2014.

Article 5 transfers the functions of the OFT in relation to the regulation of estate agents.

Article 5(1) transfers the OFT’s functions in the Estate Agents Act 1979 to Powys County Council, the lead enforcement authority.

Article 5(2) transfers the OFT’s functions as the supervisor of estate agents under the Money Laundering Regulations 2007 to the Commissioners.

***Tobacco Retailers Act (Northern Ireland) 2014***

This is an Act to make provision for a register of tobacco retailers; to make provision for dealing with the persistent commission of tobacco offences; to amend the Health and Personal Social Services (Northern Ireland) Order 1978; to confer additional powers of enforcement in relation to offences under that Order and the Children and Young Persons (Protection from Tobacco) (Northern Ireland) Order 1991; and for connected purposes.

***The Tobacco Retailers (2014 Act) (Commencement No 1) Order (Northern Ireland) 2014***

For the purposes of enabling the Department to make Regulations, this Order brings into operation on 1 May 2014 ss 1, 2, 8, 12, 13, 20 and 21 of the Tobacco Retailers Act (Northern Ireland) 2014.

***The Financial Services and Markets Act 2000 (Consumer Credit) (Transitional Provisions) (No 2) Order 2014***

This Order makes various supplemental and transitional provisions in consequence of provisions made by the Financial Services and Markets Act 2000 (Regulated Activities) (Amendment) (No 2) Order 2013 (SI 2013/1881) (‘the RAO Amendment No 2 Order’).

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Article 2 amends the RAO Amendment No 2 Order. Part 20 of the Financial Services and Markets Act 2000 provides an exemption from the need for authorisation for members of professional bodies who carry on regulated activity, which is merely incidental to the provision of professional services; such regulated activity must be the only regulated activity the member firm undertakes. By virtue of the RAO Amendment No 2 Order, various consumer credit-related activities become regulated activities for the purposes of the Act on 1 April 2014; and that Order makes provision for persons with licences issued under the Consumer Credit Act 1974 to obtain interim permission to carry on that activity. The amendments in art 2 preserve the effect of the exemption in Pt 20 of the Act where a member firm has an interim permission.

### INFORMATION

#### *Secretary of State's Guidance on the Copyright (Regulation of Relevant Licensing Bodies) Regulations 2014*

##### **Guidance**

The guidance notes have been produced by the IPO to help UK collecting societies understand how to comply with the regulations. They explain the circumstance in which they apply, who is in scope, and how this might change when European legislation on the regulation of collecting societies is introduced in 2016.

##### **Intended audience**

The target audience for the guidance notes is the 'relevant licensing bodies', ie those licensing bodies which are member-owned or controlled and operate on a not-for-profit basis.

Licensees, potential licensees and rights-holders are also likely to have an interest in ensuring that those issuing licences are compliant with the law.

##### **Self-regulation**

It is intended that UK collecting societies will self-regulate, using codes of practice, which comply with minimum standards, developed in conjunction with the sector, but set by the government. The majority of collecting societies have already adopted self-regulatory codes of practice, most under the umbrella of their trade body, the British Copyright Council. These codes are subject to review by the industry-appointed independent code reviewer.

#### *EU Votes in Favour of Country of Manufacture Labels*

The European Parliament has voted to make country of origin labels mandatory for all goods sold in the EU. Under the new guidelines any product sold in the EU would have to be labelled with the country where the product underwent its 'last, substantial, economically justified processing'. Although some countries have welcomed the new labelling guidelines as a way of protecting local industries, others have warned that the guidelines

could damage companies that rely on global supply chains. If products are produced across a number of member states then the company can opt for a 'Made in EU' designation.

***14 March 2014 – The Council Adopts the Revised Tobacco Products Directive***

The Council has formally approved the revised law regulating tobacco products on the EU market. The new legislation will improve the functioning of the internal market for tobacco and related products and mean that tobacco products look and taste like tobacco, thereby discouraging young people from starting to smoke. Following signature by the Presidents of both the Council and Parliament, and subsequent publication in the Official Journal of the EU, the new legislation will enter into force. It will have to be transposed by the Member States within two years.

***OFT Fines Three Estate Agents a Total of £246,665 for breaching Money Laundering Regulations***

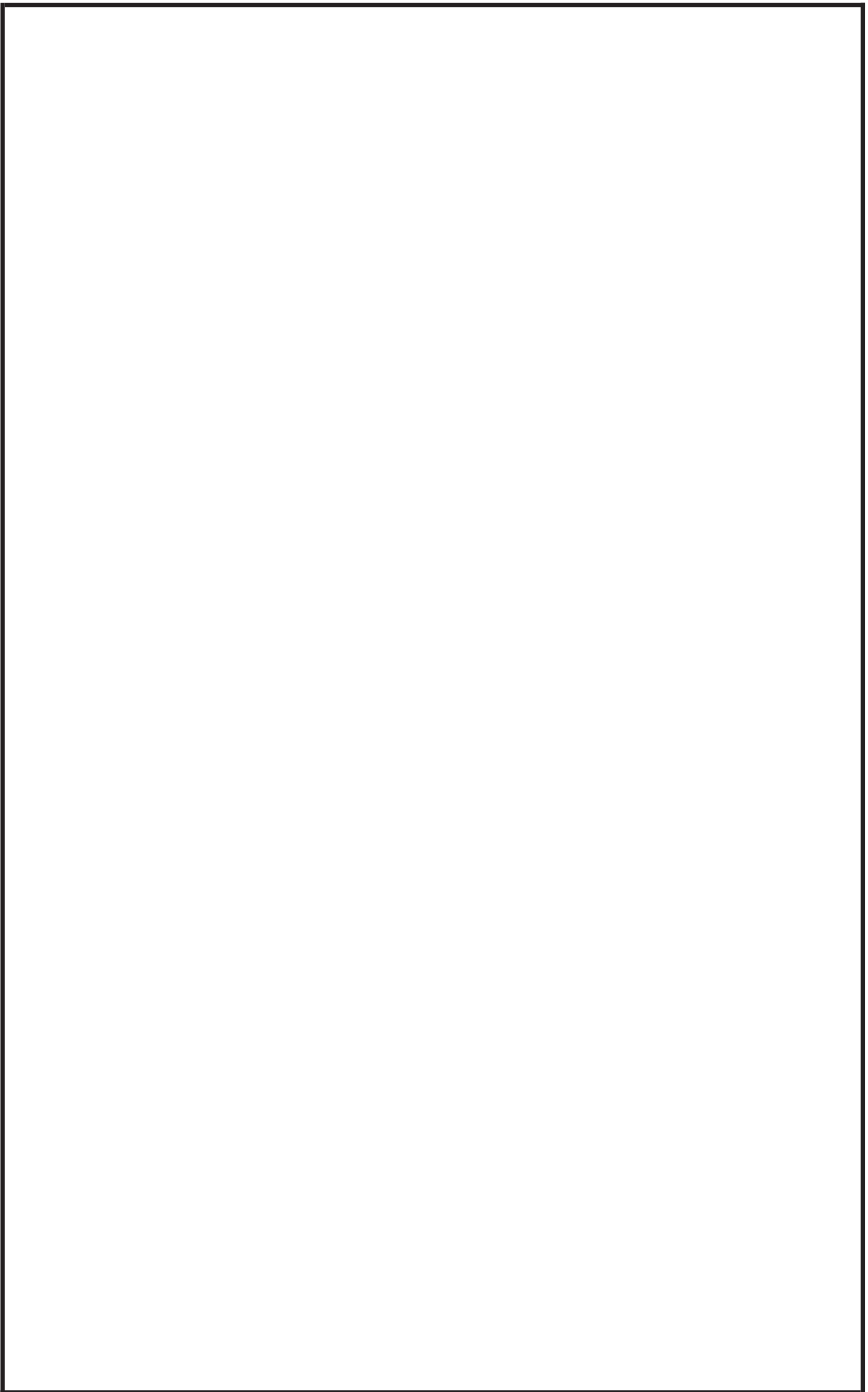
Three estate agents based in London, Northamptonshire and Cardiff have been fined a total of £246,665 by the OFT, for failing to comply with the Money Laundering Regulations 2007.

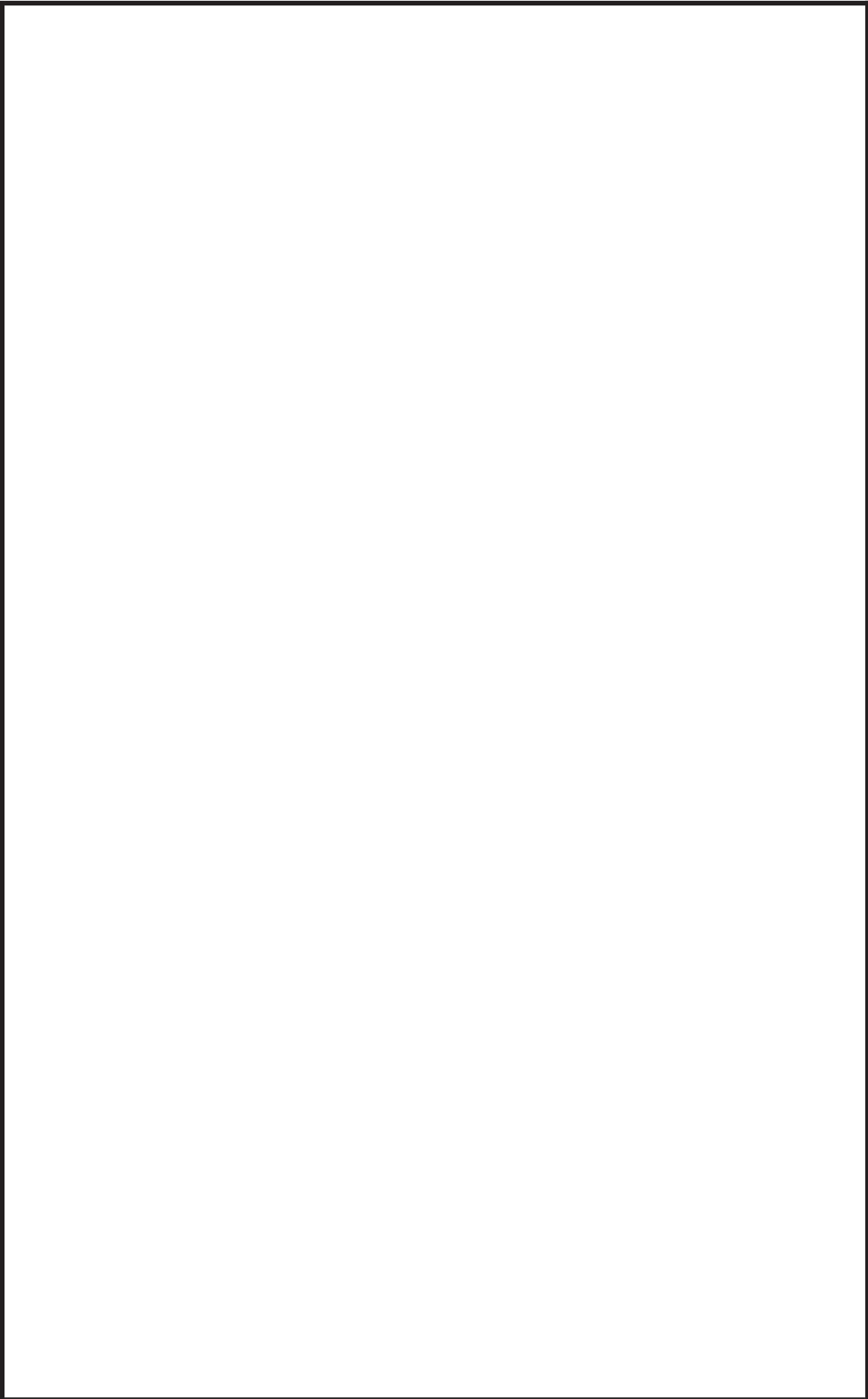
The Regulations are designed to prevent businesses from being used for money laundering or terrorist financing purposes and require regulated businesses to, for example, apply risk sensitive policies and procedures on the verification of customer identity, record keeping, training staff and reporting suspicious activity to the National Crime Agency.

Hastings International UK Ltd (Hastings) is an estate agent with two premises in south London and was fined £47,966.

Jackson Grundy Ltd (Jackson Grundy) operates its estate agency business from ten premises and was fined £169,652. The company's head office is in Duston, Northampton.

Cardiff-based Jeffrey Ross Ltd (JRL) had two premises in the city during the OFT investigation period and was fined £29,000.





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(Tel: +44 (0)845 370 1234).

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Published by LexisNexis ([www.lexisnexis.co.uk](http://www.lexisnexis.co.uk))



ISBN 978-1-4057-7831-2

