

Tech Talk

tips / techniques / training

Release Date: October 2018

Block Exemption Regulation

In 2002, “Motor Vehicle Block Exemption Regulation 1400/2002” came into force across the European Union. Further to several reviews and industry stakeholders input, the current legislation is due to remain in effect until 2023.

Like all competition law, the purpose is ultimately to benefit consumers and ensure they are not subject to restrictions in choice, uncompetitive or unfair pricing practices.

“Motor Vehicle Block Exemption” therefore, whilst ensuring the rights of vehicle manufacturers to set quality standards for the service, repair and maintenance of their vehicles, also seeks to preserve and reinforce the competitive position of independent repairers, as well as original equipment and matching quality part manufacturers.

Vehicle manufacturers cannot restrict access to information or parts that might otherwise diminish an independent workshop’s ability to compete with an approved or appointed service centre. Such a restriction might occur if a vehicle manufacturer were to use the terms of the vehicle’s warranty to direct consumers to specific service centres and/or to use certain parts.



Original vs. Matching Quality Parts

The regulation also makes provision for “Original” spare parts and “Matching Quality” spare parts.

“Matching Quality” spare parts match the quality of the components used for the assembly of the relevant vehicle. This means that these parts are of the same or even higher quality, but may for example be made of another material or be painted in another colour.

While competition is facilitated and affords “non-Original” equipment manufacturers to compete, it is very clear and does not mean that any quality of part may be used and claimed as “Matching Quality”.



True “Matching Quality” parts must demonstrably be of the same or even higher quality than the “Original” parts.



Confidence comes from within

What does this mean for Independent Workshops?

Independent workshops are free to use spare parts of their choosing so long as they are either “Original” spare parts or “Matching Quality” – vehicle manufacturers cannot insist otherwise as, for example, a condition of a warranty.

Comma products are suitable for use as “Matching Quality” parts and we state specification suitability as “Recommended by Comma for applications requiring...” whatever specification the product is.

As long as Comma products claim to meet the required specification or are recommended in Comma’s application for a given vehicle, then distributors, workshop technicians and motorists can all be completely confident that Comma products are more than suitable for use in those vehicles, even where they are still in warranty.

So what is an OEM approval then?

It is simply a confirmation by the vehicle manufacturer that a product meets the required properties that a certain specification demands. After the approval is granted the product manufacturer is allowed by the vehicle manufacturer to display “Officially Approved” or “Acknowledged by the OEM to meet the requirements” of a particular specification on the product label. The approval is supported with an official letter from the OEM.

Comma uses the highest quality base oils and additives and can technically demonstrate suitability with test data. So it is safe to say that with or without OEM approvals, Comma’s products meet all the requirements and are 100% suitable to be used where recommended.



Opportunities for Workshops

Comma products meet all the requirements and can be used with confidence to service vehicles under warranty. According to a recent market study conducted by Comma, 4 out of 10 vehicles are covered by a warranty, which means there is a significant growth potential for Independent Workshops in this segment of the automotive vehicle parc.



How can I make sure I get it right?

The safest way to select the right engine oil is to use Comma’s application tool at www.CommaOil.com. Here you will find product recommendations with our 100% compatibility guarantee for engine oil and antifreeze & coolant for European vehicles going back over 30 years. It also covers brake fluid, transmission and power steering fluid recommendations.

Or download the ‘Comma Oil Finder’ app from Google Play and the App Store



www.CommaOil.com