



Irish Mortgage Holders Organisation

The Irish Mortgage Holders Organisation Ltd.,
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Not for profit organisation.

Consultation on Personal Insolvency Acts, Part 3,
Civil Law Reform Division,
Department of Justice and Equality,
Bishop's Square,
Redmond's Hill,
Dublin 2.

30th June 2017

Re: Consultation – Personal Insolvency Acts, Part 3.

Dear Sir/Madam,

I refer to the invitation of the Department of Justice and Equality for the views of interested parties on the operation of Part 3 of the Personal Insolvency Acts 2012-2015.

I am writing to you in my capacity as CEO of the Irish Mortgage Holders Organisation and a member of the Insolvency Service of Ireland Consultative Forum ("Forum"). The Forum was established following the Government decision of the 13th May 2015 which agreed a number of measures to support mortgage holders who are in arrears.

I participated fully in the Forum and am fully supportive of the proposed changes that have been put forward by the Insolvency Service of Ireland. Similarly, I would like to add the support of the Irish Mortgage Holders Organisation to the proposals of the Money Advice and Budgeting Service along with the submission of the Association of Personal Insolvency Practitioners of which the Irish Mortgage Holders Organisation is a constituent member.

We would like to emphasis support for the all proposals made by the above organisation and most especially the following:

- 1) Debt Relief Notice: we support the reduction of the supervision period from three years to one along with the removal of the Preference eligibility criterion. Similarly, the changes to motor vehicle thresholds and increases in income are vital in our view.
- 2) The change of 'days' to 'working days' in the legislation is to be welcome and will assist with the efficient operation of arrangements.

- 3) The ability of a PIP to nominate a Chairperson for Creditors Meetings is a vital reform. The ability of PIP's to progress arrangements is hampered by the current arrangements and debtors are subject to the vagaries of PIP's holiday arrangements in seeking to progress arrangements.
- 4) Finally the proposal to allow certain functions, currently undertaken by the courts, to be carried out by the ISI is welcomed and needed. Currently the interactions with the Courts Service and time spent by practitioners attending courts nationally is a drag on both the ability of practitioners to progress arrangements and similarly increases the costs of same.

Please let me know if you have any questions or queries.

Yours sincerely,



David Hall
CEO

Irish Mortgage Holders Organisation