Submission received from Jersey Oyster 8 January 2020

Good Morning Mike

I am writing to you as Chairman of the Environment, Housing and Infrastructure Scrutiny Panel with regard the 'Minimum Standards for Rented Dwellings – Licensing Regulations to register our concern at the proposed costs of registration and the potential extra bureaucratic procedures that will be applied by the Government.

As members of the Jersey farmers Union (JFU) we have recently received notification from them that under the 'Licensing Regulations' we will be required to pay a compulsory licence fee of up to £200.00 per year, per unit to let out a property plus an application fee of £50.00 per unit. I am therefore writing to enquire if these figures are correct and if they are to ask why such a high tariff has been proposed.

Jersey Oyster has no problem with Government wishing to ensure that property owners meet minimum standards for their rental properties. That said we see no reason why such a heavy cost burden should be proposed and wonder why the current 'rent-safe' system needs to be duplicated or imposed. We also consider the proposed cost to be inflationary and potentially another 'stealth tax' on an already under pressure industry- Agriculture/Aquaculture.

Jersey Oyster currently rents out accommodation on its site at La Ferme, La Grande Route des Sablons, Grouville to its production staff who are mostly EU visiting workers. The accommodation is purpose built and meets the very highest standards of comfort being well maintained and managed. Jersey Oyster Ensures that its rental agreement with its staff meet best working practices and abides by the 'My Deposit Scheme' rules and procedures. Jersey Oyster currently has ten units of accommodation rented out to its staff and has recently had permission to build a further five units of accommodation on its site, this accommodation will include new welfare facilities for all the staff renting our accommodation.

Jersey Oyster is a responsible employer and determined many years ago that its staff should not have to pay the exorbitant rental rates that have become the norm in Jersey in the open market. Furthermore Jersey Oyster has always been determined to provide excellent accommodation affording its staff as much comfort in their accommodation as possible. Jersey Oyster maintains a level of rent which in many cases falls below the average charged by the open market and other similar industry accommodation providers. Our current charge for accommodation per person in a double unit or in a single occupancy situation is £70.00 per week.

Attracting staff to Jersey from the EU has become an increasingly difficult task. Brexit has of course played a part in this turn down but it should be noted that Jersey is seen as an expensive place to come to by EU workers. The cost of living is extremely high compared to our close neighbours including both the UK and Guernsey whilst the value of Stirling against the Euro is also seen as a factor for the fall in numbers of visiting EU staff. Because of this we do not believe that the Government should be considering a proposal that will put a further financial burden on an already under pressure industry, any extra cost will have to be passed onto the staff who rent our properties making recruitment even harder for us. We are also of the opinion that Government should not be looking at introducing any measures that have the potential to increase staff numbers in the public sector.

The UK election result has in part resolved the Brexit issue however if it proves to be a 'hard' Brexit it is likely that we will be facing the prospect of imposed tariffs further increasing costs for our

industry, it therefore seems unreasonable for our own government to be proposing a new 'stealth' tax on us at a time when there is so much uncertainty.

I have attached our rental agreement and Accommodation Condition Report for your perusal in order that you may understand the way in which we operate our staff accommodation.

I look forward to hearing from you and trust you will share our concerns with your panel members we will follow the debate on the 4th February with some concerned interest.

Best regards

Steve

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