

I would like to start by noting how difficult it has been to comment on the proposal for several reasons, the lack of time that we have been given is shocking. As a family (husband and wife, with wife on maternity leave) run business all of our time is invested in running our business, being given 5 working days to comment on something that could potentially effect our livelihood is almost impossible, then take into account the amount of information we have been given is actually impossible. From the proposal, of which I had to search for online as no copy was provided with the letter, I have noted that meetings took place on 6th June 2018 between Dft and The States of Jersey to discuss the Vienna convention and how it could possibly implicate Jersey, it has taken 4 months for any consideration of the Motor Trade to be taken and then we are asked for a shotgun response. This is unacceptable and I suggest that another approach is looked at for further undertakings with this proposal. Mechanics work long hours and surprisingly they are often not sat behind a desk to give formal written responses to states departments at short notice.

i) what impact/implications would there be to your business and/or the motor industry in general, if these proposals were adopted.

Staffing is always an issue, we have been trying to recruit a qualified mechanic for nearly 3 years, we have been working with highlands and trackers to train somebody into the position, but it is a very slow process and we are not able to rapidly grow our business with the recruitment issue the island has. On average only 1/3 of the mechanic class that starts first year at Highlands College will see the course through to the end and very few of those will stay in the industry for long. We have tried many times to access permits to employ staff without residency qualifications, and only once have we been granted this, even though we have met all the requirements on several occasions, if the states were to employ from off island, I and many others would find it infuriating and in fact i would not take this matter lying down because at times we have had to seriously think whether it is worth us continuing to trade if we can't employ staff. It has been noted in the proposal:

“The island will face a significant issue in staffing the required inspection facility. Within a limited job market, finding people with the required skills to resource any new facility will be a challenge; not least because the requirement for these skills will be in direct competition with the local motor industry.”

Time frame Given the current demand within the motor trade for standard servicing and repairs (we have a minimum month waiting period for bookings) I find it hard to see where the extra capacity will come from. DVS has a current waiting period of 5 weeks.

If a customer has a car that needs re inspection will a realistic time frame (if any) be given, as under current circumstances we are not able to see customers cars straight away, with extra pressures from mot testing (and re testing) that time frame is not going to get any less. How will this then be dealt with by the governments administration? Further late testing charges which the garage will take the blame for?

Scrapage is there enough capacity for tow companies to move all of these vehicles? And have they been consulted in this process? Where will these vehicles be stored while they are processed, DVS has limited store space, Dfi is also limited, again we go back to land issues. The proposal states:

“An increase in the scrappage of vehicles is anticipated”

ii) the details of cost have yet to be determined but the Minister for Infrastructure has commented that tests could be around £40-£60. What do you think of this?

I think the cost of the test is reasonable, I would also be interested to know how much the cost would be for retesting, if it would remain the same? And also any fines that would be imposed for not having an up to date mot?

iv) should this be a service delivered by the States of Jersey at a new proposed built test facility or should the service be outsourced to independent garages? Is there a desire within the motor industry to carry out this service? What additional equipment would be required?

Premises, we are trading from a disused farm, we have battled with the planning departments for nearly 9 years before taking our issues to the Planning Committee and them over ruling the planning department and allowing us permanent change of use to the site. During this time we have endlessly searched for alternative premises, there are very few if any industrial locations which allow any further garages to let any space, the remaining farms with buildings large enough are often not given change of use out of agriculture, even though they are undersized for the machinery now being used. I have quoted the proposition where it has been noted:

“An inspection centre approach may need to be taken, most likely a single centre due to the lack of available land for multiple centres”

Regulating/Standardising like with any industry there are some people who are waiting for any opportunity to make an extra buck from the unsuspecting customer. If this is to be outsourced how can the states guarantee that this won't be allowed to happen? Or that the company will be held accountable, current trading standards seem to only offer the advice to take the matter to small court, or they may have a word with the company but nothing further. I truly don't think outsourcing this to one single garage would be beneficial to the island. If it goes out to several how would the states ensure a standardised process is followed? Will there be security that the garages who are not inspection centres still have a right to trade and that the industry won't become monopolised by a few?

Costings aren't something we can even take into consideration without knowing any details of the work that may need to be undertaken. There is nothing in the proposal that gives any insight as to what will be included in the test, emissions? Rust/Body Condition? If the car has had an annual service? Tyres (I do hope the tyre repair shops have been included in this consultation).

Loan scheme for equipment if any is necessary. The farming industry and Finance industry is helped out generously by the states, the motor trade has been struggling for a number of years and will continue to struggle under further pressures, if this is a necessity perhaps as a gesture of good will a scheme could be offered to help undertake the new costings involved. If a new facility is to be built include a training area and have regular sessions for local garages to ensure standards are being met across the board. Should it be considered to built a facility to include DVS? Would this be more beneficial financially given a lot of the work and/or equipment would more than likely be used by both departments.

v) what do you think about the proposed frequency of the test?:

Rolling out scheme I do not think it is realistic to initially expect the whole island to meet with the current timeline set out, perhaps start with cars that are actually travelling abroad and set the targets for other cars over a longer period with different phases. There will be a bedding in period which, with the many parties involved will not take 5 minutes.

Age/types of vehicles there are many old cars in jersey, what will the parameters be around these cars, many of which are far better cared for than newer vehicles, but may not necessarily meet new

test requirements for emissions. Has consideration been taken for cars in storage (including private collections) that may never travel on the road for various reasons, will they still be stipulated under the conditions of road going cars?

Final Note

I would also like to comment that although we undertake a large amount of work on commercial vehicles there has been no communication from any states department into the newly rolled out commercial inspections that are now underway on vehicles over 7.5 tonnes and then from May 2019 for vehicles over 3.5 tonnes, which I have only found out by reading this proposal. Since we started trading 14 years ago it has always been a struggle to work within the expectations that the states hold against small business with no assistance at all. Larger companies hold more weight and are able to dictate how they trade (ie work permits). Over the last 3 years it has become almost impossible to even know if we are meeting the expectations that the states have for us because nothing is communicated. I follow the states assembly, I read local newspapers and websites, I also even follow the States of Jersey on both social media platforms, it is not like I am wondering around with my eyes closed, yet time and time again we are under informed and penalised. Please if these new conditions are to become necessary, consult with ALL the local garages and LISTEN to what we all have to say, communications from both parties will be key to making this work. We have spoken to several garages who were not aware of this proposal let alone their opportunity to comment, if you want a cohesive response you need to ask the right people the right questions, not open ended questions to a select few.

DO NOT make this another fiasco like the hospital has turned into.