

Dear Connetable

Re my previous email. Whilst vehicles do have to conform with domestic technical legislation to travel abroad it seems that if we must sign this convention - and we needn't - it would appear by article 39 in the 68 convention some form of inspection regime has to be brought in. It all depends on whether we really need to or should sign. The Isle of Man has decided not to sign. I think the question has to be asked therefore does that mean by not signing that IOM vehicles are barred from travelling outside the U.K. and the Republic of Ireland (they have a bi lateral agreement with the ROI). Has anyone asked the IOM? Have they been told their vehicles can only circulate in the British Islands and the ROI if they don't sign? I know the UK has gone completely overboard with Brexit and the worst case scenarios but shouldn't we in Jersey at least wait until the leaving details are known? If there is an agreement P109 may not be needed anyway. If there is an agreement it should be known at the end of November.

Also in P109 lodged yesterday it goes on about needing a 1968 Convention International Driving Permit to travel in former EU countries. Looking at the 68 convention it would appear this is not so as annex 6 of that convention agrees that domestic driving permits (our Jersey licences) are acceptable for international circulation provided they conform with annex 6 - ours do. I don't know what P109 is on about there. I agree if we do sign our domestic legislation needs to be amended to allow issuing of 1968 IDPs for those who do want them but I submit they will not be compulsory as our domestic licences conform with the 68 convention requirements.

I also think P109 is vague on the introduction of vehicle testing. They say there will be 40,000 needing testing. How do they propose to start it? Work up from J1? It is all a bit vague. Also how long will an inspection take? If 40,000 need to be inspected every 3 years that is 13,300 per annum. At 1 hour an inspection that is 13,300 hours for the actual inspection, not to mention the ancillary duties attached. We could be talking about 14,000 labour hours. Traffic Officers work a 37 hour week so 37 x 46 Weeks (annual leave and bank holidays is the other 6 weeks) is 1,702 hours for 1 T.O. Calculating in sickness you would need 9 extra T.O.s minimum if done at DVS, that is if a PTI aka MOT takes 1 hour. Another way of looking at it is 266 vehicles being tested in a week. As I said earlier P109 waxes lyrical of why this needs to be done if we sign but is lacking on the actual mechanics (no pun intended) and costs in finance and estate of it all.

I know your scrutiny panel will delve into this but my opinion is it is a complete over-reaction.

When will the scrutiny panel be sitting on this?

Regards

James Sinclair