



The Power to Surprise



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4th October 2018

Connétable M K Jackson
Chairman
Environment, Housing and Infrastructure Scrutiny Panel
Scrutiny Office
States Greffe
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Dear Connétable Jackson

Vehicle Road Worthiness Testing

I write in my capacity as the Managing Director of Bel Royal Motors. I am also the Vice President of The Jersey Motor Trades Federation. The Jersey Motor Trades Federation, if requested to do so, will respond to this subject independently to this letter.

If vehicle road worthiness testing was introduced into Jersey, we are of the opinion that first and foremost, road safety and the environment can, should and will be the major winners. We experience many examples, on a weekly basis, where cars are presented to us in an un-roadworthy condition. Thankfully, we are able to take positive steps through our workshops, to rectify any faults, and release the cars back onto the Jersey roads in a safe condition. We can also be party to encouraging owners to permanently remove vehicles from the roads, should they be deemed to be uneconomical to repair. In addition to routine service examinations of vehicles, cars are often offered to us as part exchange vehicles in a condition that reveals that they are only fit for scrap. Up to the date when we take such cars in as part exchanges, or carry out a service, these cars would have been in daily use on our roads. Annual road worthiness testing would identify cars that are not serviced regularly, if at all, and ensure that only cars that pass a minimum standard are being driven on our roads.

It is our opinion that vehicle roadworthiness testing should be the principal responsibility of an entity that has no financial interest in any subsequent repairs needed to failed vehicles. Public opinion, and some political opinion is such, that it is perceived that the motor trade encourages testing to motor vehicles to enhance their business and profits. Whilst increased business and profits would be an obvious consequence to the motor trade, as mentioned above, our principal concern is for the safety of our roads. By ensuring that testing is carried out by independent entities, some of that scepticism would be removed.

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In suggesting that vehicle testing should be carried out by an independent provider, we also believe that Government should, in addition to an independent centre, consider outsourcing testing to a number of reputable service entities such as Bel Royal Motors. This would provide a degree of customer availability should the Government appointed facility not be able to cope with seasonal peaks such as school holidays or staff pressures. It would be our intention if appointed, to combine annual testing with routine annual servicing, therefore reducing the charge to the customer, as much of the content of an annual roadworthiness inspection would be covered in a comprehensive service. In combining the roadworthiness inspection with an annual service, we would be able to considerably reduce the potential charge of £40.00 to £60.00 to perhaps half of that and remove the need for a journey to a central testing agency to have much of the work duplicated.

We feel that a charge of £40 to £60 per inspection, when annualised over three years, would be very fair. We assume that figure would be arrived at, taking into account the return on any capital investment and day to day running costs of the facility. Whilst considering the cost per inspection, it is our opinion that a biennial inspection would be more prudent to a three year inspection. Faults will appear at any time a car is driven, and perhaps three years is too long a time frame between testing. We suppose, ideally an annual test after the vehicles fifth birthday would be the safest option.

We are of the opinion that the introduction of road worthiness inspections would place pressure on the recruiting of motor technicians. We are led to believe that any centralised testing facility would require 6 inspection staff and 2 administrative staff. At present, we struggle to recruit the necessary skills in our workshops and we feel it would be inevitable that the 6 technical personnel would come from the private sector, leaving us with the headache of recruiting replacements. Flexibility with staff licensing may be required to fill the skills shortage in the short term.

In summary, we feel that annual roadworthiness testing would make our roads safer and bring us in line with our European neighbours. Whilst the potential consequence of a defective vehicle driving on Jersey roads is minimal, that same defective car travelling at 80mph may be a different proposition; we should comply with best practice and not wait for a potential public relations disaster when one of our cars causes a major incident off Island.

A centralised testing facility would go some way to appeasing the sceptics who feel that we as a motor trade would irresponsibly take advantage of vehicle testing, but a complimentary network of testing stations would be needed to make the process smoother and more reliable to the consumer. We believe that the motor trade could not cope on its own with vehicle testing without significant additions to staff, vehicular access and premises.

Yours sincerely



Alan Osmand
Managing Director