

### **Appendix 14: Written Submissions**

30 written submissions were received to the consultation. All those submitting written responses were contacted by email to provide their permission to reproduce their submission here.

Permission was not given or no response was received following the request for consent from five submissions, these submissions have not been included in this Appendix.

Information and views in all 30 submissions were considered and included in the consultation analysis.

Consent was obtained from 25 respondents to reproduce their submissions in this Appendix.

All individual responses are reproduced anonymously. Where the response is provided on behalf of an organisation or business, the organisation could choose whether the response was attributed to the organisation. All personal / identifiable and commercially sensitive information has been redacted from the submissions.

While all effort was made to reproduce the submissions faithfully, the redaction process can result in changes to the format / presentation of the document.

The views expressed are those of the respondents.

**001 – AUSTIN HEALEY OWNERS GROUP (Jersey)**

**Re: Submission on Proposed Combustion-Engine Vehicle Import Restrictions**

Dear Sir/Madam,

On behalf of the Austin Healey Owners Group (Jersey), we are pleased to submit our response to the proposed policy restricting the importation of combustion-engine vehicles.

Our group is a small but active part of Jersey's classic-vehicle community. All members are affiliated with the national Austin Healey Club, and many also participate in other historic-vehicle clubs on the island. We aim to preserve, maintain, and responsibly use vehicles that form an important part of both local and international motoring heritage.

Enclosed is a detailed proposal outlining the case for a clear exemption for classic, historic, and heritage vehicles. Key points include:

- Classic vehicles contribute **negligibly to emissions**, due to extremely limited use, insurance-mandated mileage restrictions, and a culture of careful preservation.
- The Austin Healey marque illustrates the **global historical significance** of classic vehicles, though this applies across the entire diverse classic-car community in Jersey.
- Classic vehicles provide **cultural, educational, and economic benefits**, including support for tourism, specialist trades, and community events.
- A targeted exemption is **proportionate, enforceable, and consistent** with international approaches, ensuring that sustainability goals are met without unnecessarily restricting heritage preservation.

We respectfully request that the States of Jersey consider including a formal exemption for classic, historic, and heritage vehicles within any future restrictions on combustion-engine imports.

We would be pleased to provide further information or attend a consultation if helpful.

Thank you for your consideration.

Yours faithfully,

[TEXT REDACTED]  
Austin Healey Owners Group (Jersey)

*Enc Proposal for Exempting Classic Vehicles from Jersey's Proposed Combustion •Engine Vehicle Import Restrictions*

## **Proposal for Exempting Classic Vehicles from Jersey's Proposed Combustion-Engine Vehicle Import Restrictions**

### **Submitted by the Austin Healey Owners Group (Jersey)**

#### **Who We Are**

This submission is prepared by the local Austin Healey Owners group, a small but active part of Jersey's classic-vehicle community. All of our members are affiliated with the national Austin Healey Club, ensuring high standards of preservation, mechanical care and responsible ownership. Many members also participate in several of the island's other historic-vehicle clubs, reflecting the collaborative and interconnected nature of Jersey's wider classic-vehicle fraternity.

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#### **Executive Summary**

Jersey's environmental goals are important and supported by the classic-vehicle community. The transition away from high-emission, daily-use vehicles is achievable without affecting the island's cultural or mechanical heritage. However, any prohibition on the future importation of combustion-engine vehicles must include a clear exemption for **classic, historic and heritage vehicles**.

Classic vehicles are sparingly used, carefully preserved, and already restricted through insurance-imposed mileage limits and owner behaviour. Their contribution to emissions is negligible, while their cultural and historical value—both locally and internationally—is significant. A balanced exemption will protect Jersey's heritage without impacting the island's carbon-reduction trajectory.

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### **1. Cultural and Historical Value**

#### **1.1 A living record of engineering heritage**

Classic vehicles are physical artefacts of engineering, design and social history. They capture eras of technological development, craftsmanship and innovation. Restricting their import would gradually erode Jersey's ability to preserve these important elements of motoring heritage.

#### **1.2 Integral to community, charity and public events**

Classic vehicles contribute greatly to island life—whether through charity runs, club gatherings, exhibitions, weddings or tourism-related events. These activities foster community identity and bring economic and cultural benefits to the wider public.

#### **1.3 Austin Healey as one example of wider motoring heritage**

Although we represent only a small part of Jersey's classic-vehicle community, the Austin Healey marque provides a powerful illustration of the heritage value shared across many marques. Developed under the direction of Donald Healey—a pioneering British automotive engineer—the Austin Healey line became an international icon of post-war motoring.

Worldwide, **hundreds of thousands of words** have been written about Austin Healeys: in books, engineering analyses, motorsport histories, club journals, documentaries and online archives. This immense body of material reflects the global fascination with the marque and the enduring legacy of Donald Healey's work.

But Austin Healey is only one example. Many other classic marques on the island have equally rich histories, deep documentation and enthusiastic global followings. Our intention is not to elevate one marque above another, but to demonstrate how each contributes to a shared tapestry of motoring heritage. A classic-vehicle exemption protects all of these stories.

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## **2. Negligible Environmental Impact**

### **2.1 Extremely low annual mileage**

Classic vehicles are not used as daily transport. They accumulate only small annual mileages, typically limited to occasional leisure drives, club events or shows.

### **2.2 Insurance-mandated mileage restrictions**

Most classic-vehicle owners hold specialist classic-car insurance policies, which invariably impose annual mileage limits—often between 500 and 3,000 miles. These limits ensure that classic vehicles cannot be used excessively, guaranteeing minimal emissions.

### **2.3 Preservation culture further limits use**

Classic-vehicle owners treat their cars as protected assets. Many will not drive them in rain or poor weather to avoid corrosion, water ingress or mechanical stress. This protective culture means that most classic vehicles spend the majority of their time stored, maintained and cared for—not on the road.

### **2.4 No material impact on Jersey's emissions strategy**

Jersey's decarbonisation goals will be achieved through electrification of daily-use vehicles, upgrades to commercial fleets: public-transport improvements and active-travel initiatives. Classic vehicles represent such a small proportion of use that exempting them will not affect these pathways.

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## **3. Economic and Tourism Benefits**

### **3.1 Contribution to tourism and events**

Classic-vehicle rallies, visiting touring groups and heritage exhibitions attract enthusiasts and tourists. They support hotels, restaurants, transport services and local retail.

### **3.2 Protecting skilled trades and apprenticeships**

Jersey benefits from specialist mechanics, restorers, bodywork experts and upholsterers who maintain older vehicles. Restricting classic-vehicle imports would threaten these niche professions and reduce opportunities for passing on traditional skills.

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## **4. Fairness, Proportionality and Regulatory Clarity**

### **4.1 Proportional regulation**

Classic vehicles form only a tiny fraction of Jersey's vehicle fleet and are already heavily limited in use. Applying a blanket import ban to them would be disproportionate and unnecessary.

### **4.2 Clear, consistent definitions**

Many jurisdictions adopt age-based definitions (e.g., 25 or 30+ years old) or rely on historic-vehicle registration schemes. Jersey can adopt similar criteria to ensure clarity and enforceability.

### **4.3 Preventing abuse of the exemption**

A classic-vehicle exemption can be tightly defined by requiring:

- proof of age\*
- classic-vehicle insurance,
- non-commercial use, and if applicable, club membership or historic-vehicle registration.

This ensures the exemption cannot be used to circumvent the intended policy.

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## **5. Alignment With Jersey's Sustainability Goals**

### **5.1 Balanced and measured decarbonisation**

A classic-vehicle exemption demonstrates that Jersey can achieve environmental progress while respecting cultural heritage, community identity and specialist skills.

### **5.2 Support for circular-economy principles**

Classic-vehicle ownership is inherently sustainable: it prioritises repair, reuse, restoration and long-term preservation over disposal and replacement.

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## **Conclusion**

Classic vehicles, whether Austin Healeys or any other cherished marque, represent an irreplaceable part of Jersey's engineering, cultural and community heritage. They are sparingly used, tightly regulated through insurance and preservation practices, and contribute negligibly to emissions. Removing the ability to import such vehicles would harm heritage without delivering environmental benefit.

For these reasons, we respectfully urge the States of Jersey to include a **clear and robust exemption** for classic, historic and heritage vehicles within any future restrictions on combustion-engine imports.

## **002 – ASTON MARTIN OWNERS CLUB**

Dear [Text redacted],

The Aston Martin Owners Club was established over ninety years ago and has an international membership. Locally, Area 23 in the Channel Islands continues to grow, reflecting both sustained interest in the marque and the wider social, cultural, and economic value that organised motoring activities bring to the Island.

I am writing to formally raise concerns in relation to the proposed carbon neutral roadmap, specifically the structure and implications of the current exemption framework. I am concerned that the proposals, as currently drafted, risk producing unintended and disproportionate outcomes for classic and historic vehicle owners, without delivering meaningful environmental benefit.

I would ask the department to consider the following points in the context of proportionality, economic impact, and cultural value:

- The proposed fifty year exemption threshold is unduly restrictive and creates a rigid cut off that fails to reflect vehicle usage patterns or real world emissions. Owners of modern classic vehicles, many of which are used sparingly and maintained to a very high standard, would effectively be prevented from replacing their vehicles in future, regardless of individual circumstances. This approach risks being seen as arbitrary rather than evidence based.
- Classic and historic vehicles contribute a negligible proportion of overall emissions due to their very limited annual mileage. Any emissions savings achieved through restricting this category would be marginal at best, while the impact on individuals and communities would be significant. In policy terms, this raises questions about whether the measure is proportionate to the problem it seeks to address.
- Classic vehicles represent a living record of motoring heritage and engineering history. Keeping these vehicles in active use allows younger generations to engage with skills, technology, and design in a tangible way. Policies that unintentionally remove these vehicles from public life risk eroding an important element of Jersey's cultural landscape.
- The Federation of British Historic Vehicle Clubs (FBHVC), a recognised industry body, defines "youngtimer" vehicles as those aged 20 years or more and classic vehicles as those aged 30 years or more. FBHVC research demonstrates that classic vehicle ownership typically begins with young timer vehicles. Excluding this category undermines the long-term sustainability of the historic vehicle sector and conflicts with established industry definitions.
- The classic vehicle sector provides measurable economic benefit to the Island. Ongoing maintenance, restoration, and preservation support local specialist trades, including mechanics, auto electricians, body repairers, painters, and trim specialists. This sustains skilled employment, helps retain specialist knowledge locally, and provides pathways for younger people to enter technical trades.
- Jersey already benefits culturally and economically from historic motoring activity. Events such as the Jersey International Festival of Motoring attract significant visitor numbers, including attendees from the UK and Europe, contributing directly to tourism revenue and

enhancing the Island’s profile. The popularity of these events across a wide demographic illustrates their public value and community support.

In summary, the current exemption framework risks applying a blunt instrument where a more targeted, evidence based approach is required. I would strongly encourage the department to review the proposed age thresholds and consider alternative mechanisms such as mileage based criteria or broader historic vehicle definitions that better balance environmental objectives with cultural, social, and economic considerations.

I hope these points will be taken into account as the policy develops and would welcome further engagement or clarification on how these concerns are being assessed within the decision-making process.

Yours sincerely,

[Text redacted]

Area 23 Area Rep

**ASTON MARTIN OWNERS CLUB**

[Text redacted]

**003 – Individual**

Hi,

WRT the combustion car ban survey:

This is interesting and demonstrates that 100% EV sales is possible in Jersey today, let alone in 5 years time, when you have a Government that is willing to make the bold decisions and stick by them, which is our case would be the Net Zero target.

"New record: Almost 100% EV registrations in November"

"19,427 new electric cars were registered in Norway in November — only a few hundred non-electric cars were added to the roads."

<https://www.electrive.com/2025/12/01/norway-sets-new-record-with-near-100-electric-vehicle-registrations-in-november/>

People in Norway drive much longer distances (many hundreds of miles) than we do in Jersey, yet they almost all buy EV's, because with EV's now averaging 300 mile range, range anxiety no longer exists in Norway.

People in Jersey that harp on about EV range are clueless, they need to be educated to dispel the big oil companies anti-EV propaganda that's been doing the rounds for decades. The Toyota "breaks the laws of Physics" self-charging myth also needs to be busted, it's Hydrocarbons charging the car, it's not free energy.

Kind regards,  
[TEXT REDACTED]

## **005 – Jersey Motor Trades Federation**

### **JMTF Feedback on the Government’s Proposed Vehicle Ban**

To ban the importation of all new and used diesel and petrol-engined (ICE) cars and commercial vehicles up to 3.5 tons starting in 2030.

#### **Executive Summary**

While aligning with the UK’s ban on new internal combustion engine (ICE) vehicles is understandable, Jersey’s additional proposal to prohibit the importation of used vehicles raises significant economic, social, and infrastructure challenges. This document outlines the potential consequences and suggests considerations for mitigating negative impacts.

#### **Opinion**

- The Government does not need to take further action regarding new vehicles, as Jersey will follow UK regulations. This will save the government money on law drafting, etc. If the UK enforces a ban, franchised dealers in Jersey will only supply vehicles permitted under UK law. However, Jersey’s intention to ban the import of used vehicles introduces serious repercussions that require careful evaluation. We welcome the fact that the Government has agreed to align its policy with the UK Government’s actions.
- The original Carbon Neutral Roadmap (CNR) suggested that by 2030, 67% of vehicles in Jersey would be EVs. We are currently running at 4%. We would require the sale of almost 16,000 vehicles per year. The import of both New and Used Vehicles has averaged 4,500 vehicles per annum; this clearly demonstrates that the ambition is unachievable and should be reassessed.

#### **What has changed since CNR agreed in April 2022**

- Geopolitical tension, increased rates of inflation, and cost-of-living crisis
- The European Union (EU) has significantly softened its planned 2035 ban on new petrol and diesel cars, shifting from a 100% zero-emission target to a 90% reduction, allowing some internal combustion engine (ICE) and hybrid cars to remain on sale.
- Car manufacturers have reduced their investment in pure EV vehicles, with many developing new ICE engines.

#### **Consequences**

##### **Impact on Consumers**

- **Rising Costs:** The price of second-hand vehicles already in circulation on the island will increase significantly, driving inflation and raising the cost of living.
- **Reduced Choice:** Consumers will face significantly fewer options for affordable transportation. There are currently over 400,000 used cars available on Autotrader in the UK that anyone in Jersey can buy; the ban would reduce customer choice to aging on-island cars or an EV.
- **Civil Liberties Concerns:** The ban could be perceived as limiting personal freedoms and consumer rights.
- **If Franchised Dealers are unable to import all used cars to resell,** they may well become unviable, and the Franchise could leave the Island, leaving hundreds of customers with cars that will have no Dealer support, resulting in vehicles having to go to the UK for safety recalls, software updates, etc.
- **Since Covid,** the price of both new and used cars has risen exponentially. The ban will likely result in low-income earners not being able to afford to update their car and will have to keep running their old polluting cars, which may become unroadworthy and dangerous as they cannot afford the necessary repair work, or parts required are not available due to vehicle age. Due to unaffordability, infrastructure limitations, and

potentially very high end-of-life disposal costs, low-income users will not wish to buy an EV.

### **Myth Busting**

- The Government is under the impression that Jersey will become a “Dumping ground for vehicles that can no longer be sold elsewhere.” Industry cannot understand this view and would be interested to know how the Government believes this could be the case? Dealers will not import cars from Europe as they are 99.9% Left hand Drive, RHD cars from other markets are generally a different specification, ie Set up for hot climates, etc. They also will not have European Homologation, so many parts like glass, headlights etc., do not conform to our legislation. Used cars will never be dumped in Jersey when any high-polluting cars attract VED @ £12,401 and likely to increase substantially every year.

### **Impact on Businesses**

- Motor Trade Risks: Many businesses rely on importing vehicles to maintain stock and competitive pricing. A ban threatens the Industry's viability and approximately 1,000 people employed or associated with it.
- Commercial Operations: Businesses using vans under 3 tons for deliveries and services will face higher costs due to limited EV range, insufficient charging infrastructure, and lack of competition. These costs will ultimately be passed on to consumers.

### **Infrastructure Challenges**

- Charging Access: Up to 50% of households may lack off-street parking for EV charging. Recent surveys show that 89% of EV buyers live in houses or bungalows, highlighting infrastructure limitations.
- Slow Growth of Public Chargers: Over the past three years, public EV chargers increased by only 1.8%, with just 111 chargers serving 4,000 EVs on the island.
- Electricity Supply Uncertainty: Jersey currently enjoys low electricity costs, but the supply agreement ends in 2027, creating uncertainty about future pricing.
- Grid Limitations: Many households cannot install EV chargers due to inadequate infrastructure in certain areas.

### **Recommendations**

- Infrastructure Investment: Accelerate EV charging network expansion and grid upgrades.
- Consumer Incentives: Expand EV purchase schemes and explore shared charging solutions for households without off-street parking.
- Give serious consideration to other environmentally friendly options such as synthetic fuel, hydrogen, etc.
- Energy Strategy: Secure a long-term electricity supply agreement before implementing the ban.

### **Conclusions**

- The JMTF is happy for Jersey to be aligned with the UK regarding New Vehicles as and when the UK makes a decision.
- The JMTF is ardently against any form of ban on the importation of Used vehicles.

## 006 – Individual

I am writing to formally register concerns about the structural design and methodological integrity of the "2030 Petrol and Diesel Vehicle Phase-Out Consultation" survey ([survey.gov.je](https://survey.gov.je) reference). I also attach a copy of my completed survey as it was unclear whether the huge effort in completing it resulted in a successful submission.

### 1. SURVEY DESIGN BIAS

The survey structure systematically constrains meaningful opposition:

- **Principle-based framework:** The five "principles" are presented as foundational givens rather than open for debate. Respondents cannot disagree with the underlying policy rationale—only with specific implementation details. This is a leading question structure that prevents fundamental policy critique.
- **Binary exemption framework:** Questions 16-18 on exemptions assume the ban will proceed and only permit discussion of carve-outs, rather than whether the ban itself is justified. This forecloses meaningful opposition.
- **Loaded impact assessment:** Question 19 pre-selects specific concern areas while excluding others (e.g., no option for "disproportionate impact on lower-income households" specifically, only generic "cost of motoring").
- **Framing bias:** The survey repeatedly uses terms like "phase-out" and "transition" that assume these are inevitable, rather than asking whether respondents support the policy at all.

A genuinely neutral survey would include questions such as:

- "Do you support or oppose a ban on petrol and diesel vehicle imports from 2030?"
- "Should exemptions be expanded such that the ban becomes ineffective?"
- "Should this policy be abandoned in favour of emissions reduction targets?"

### 2. RESPONDENT VERIFICATION FAILURE

The survey collects no information to verify respondent eligibility:

- **No Jersey residency confirmation:** Respondents could be from anywhere globally. Non-residents (UK citizens, international commentators, activists) could skew results without legitimate interest in Jersey policy.
- **No email collection:** No email address is captured, preventing follow-up verification, duplicate detection, or confirmation that respondents are actual individuals.
- **No identity verification:** No requirement for name, address, or Jersey tax/social security number to confirm Jersey resident status.
- **Anonymous submission:** Complete anonymity prevents accountability and makes it impossible to distinguish genuine resident feedback from coordinated submission campaigns.

This is particularly problematic given that this consultation will inform legislation affecting Jersey residents' access to affordable vehicles, transport costs, and motor trade employment.

### 3. DATA QUALITY AND REPRESENTATIVENESS CONCERNS

Without verification mechanisms:

- It is impossible to know whether responses represent actual Jersey residents or external pressure campaigns
- Duplicate submissions cannot be detected or removed
- The consultation claims no methodology to weight responses by residency, employment impact, or demographic representation
- Statistical validity is severely compromised

#### **4. COMPARISON TO STANDARDS**

UK government consultations require:

- Respondent postcode verification (at minimum)
- Email address collection for follow-up and fraud detection
- Statement of respondent status (individual, business, organisation, campaign group)
- Impact assessment of likely respondent bias

Jersey's consultation meets none of these standards.

#### **5. TRANSPARENCY AND PROCESS INTEGRITY**

I request:

##### **a) Disclosure of respondent data:**

- How many responses have been submitted?
- What proportion of respondents identified as Jersey residents?
- What geographic distribution do respondents show?
- How many responses came from identical IP addresses or email patterns?

##### **b) Verification protocol publication:**

- What methodology will be used to weight responses by residency?
- Will non-resident responses be flagged or excluded from analysis?
- What efforts will be made to identify and exclude duplicate/fraudulent submissions?

##### **c) Survey redesign commitment:**

- Will a revised consultation be conducted with proper verification mechanisms?
- Will the survey include questions permitting fundamental policy opposition, not just implementation details?

##### **d) Consultation timeline extension:**

- Given these methodological flaws, will the consultation deadline be extended to allow a properly-designed replacement survey?

#### **RECOMMENDATION**

This consultation, as currently structured, cannot provide a defensible basis for legislation affecting Jersey residents' transport access, costs, and employment. Before proceeding with the phase-out proposal, Jersey government should:

1. Conduct a revised consultation with proper respondent verification
2. Include questions permitting fundamental policy opposition
3. Publish respondent demographics and verification methodology
4. Commission an independent assessment of survey design bias

The current survey's design and lack of verification mechanisms undermine its legitimacy as a policy input mechanism.

I request written acknowledgement of these concerns and a formal response addressing the verification and design issues identified above.

Yours faithfully,

[TEXT REDACTED]

Dear [TEXT REDACTED],

Thank you for your comprehensive response and for confirming receipt of my survey submission.

However, I must respectfully point out a fundamental contradiction in your position. You state that the consultation "has consequently not been framed as a 'go/no go'" because the States Assembly approved the CNR principles in 2022. Yet you simultaneously claim the consultation will "support Ministerial consideration of the public's views before agreeing how best to proceed." If the decision has already been made, what exactly is the consultation for? A consultation that cannot influence the outcome it purports to examine is not a consultation - it is a communications exercise.

On your specific responses:

Regarding the free text box as a substitute for structured opposition questions: the inclusion of an open text field does not remedy the absence of direct questions on whether the policy itself is supported. Structured questions drive statistical analysis; free text is routinely deprioritised or summarised subjectively. You will know this. A genuinely balanced survey would have included a straightforward question asking whether respondents support or oppose the 2030 phase-out.

Regarding respondent verification: you confirm that no email addresses were collected and that the survey relies on IP addresses and parish self-reporting. IP addresses identify devices, not individuals, and are trivially masked through VPNs. Parish is self-declared and unverified. This falls materially short of the UK standards I referenced, and your acknowledgement that diversity monitoring was not undertaken only reinforces the point. Describing the consultation as having generated "a very high level of engagement" is meaningless without the ability to verify who is engaging.

Regarding the refusal to redesign or extend: I note your position, but it does not address the substance of my concern. A flawed instrument does not become sound because senior officers approved it prior to release.

More broadly, and this is the point I would most like this department to consider seriously: Jersey is not ready for this transition. The Island's charging infrastructure is insufficient, the cost of electric vehicles remains prohibitive for many households, and the used vehicle market - which you acknowledge remains in Jersey's gift - is the primary means by which lower-income residents access transport. Forcing this timeline without genuine public readiness risks significant economic and social harm to the very Islanders this government is meant to serve.

The survey, as designed, does not and cannot surface the depth of public concern on these practical realities. I would urge the Minister to reflect on whether a consultation that was structured to refine an implementation plan, rather than to test public readiness, provides a sufficient mandate to proceed with legislation of this significance.

I look forward to the consultation report in March and trust these concerns will be given due consideration.

Yours sincerely,

[TEXT REDACTED]

**007- Individual**

Hi

My interest is purely personal, and wanting equality in all things, particularly those concerning this issue

I do like my cars but am not a member of any specific group.

I am particularly concerned we - the government that is - are looking at the low hanging fruit here and not looking at what we need to do as priority and how best to do it, without overreaching government into the freedom and choices of the people. Whilst still saving the planet

KR

[TEXT REDACTED]

**008 – Individual**

Dear [TEXT REDACTED],

I hope this email finds you well.

As a resident of Jersey, I am writing to express my concerns about the current Carbon Neutral Roadmap and the associated Vehicle Excise Duty (VED) policies.

While I appreciate the Government's efforts to reduce emissions and promote sustainability, I believe these measures are inadvertently penalising islanders by encouraging the purchase of expensive electric vehicles (EVs) and hybrids, often on finance, without fully considering the unique circumstances of our small island.

One key issue is the high emissions standards applied to internal combustion engine (ICE) vehicles, which make them subject to higher VED rates. This effectively pushes residents towards EVs and hybrids as more affordable long-term options in terms of taxation. However, hybrid versions of larger vehicles often benefit from significant VED reductions due to their lower official CO<sub>2</sub> ratings.

In reality, many hybrids—particularly plug-in hybrids—have a shorter effective lifespan for their battery components, and when operating without a charged battery (which is common in real-world use), they can emit far more CO<sub>2</sub> than their official figures suggest, sometimes comparable to or exceeding conventional ICE vehicles due to added weight and less efficient engine operation. On an island like Jersey, where average annual mileage is relatively low due to our compact size (reportedly around 4,000 miles per year), the environmental benefits of switching to EVs or hybrids may not materialise as expected.

The production of EV batteries involves significant CO<sub>2</sub> emissions upfront. For the typical islander driving such low annual mileage, an EV may never accumulate enough lifetime mileage to offset this initial carbon footprint before the battery degrades significantly or requires replacement. Battery replacements come at a substantial cost, often tens of thousands of pounds, and may provide little to no net CO<sub>2</sub> benefit in low-mileage scenarios. This could result in islanders facing unnecessary financial burdens without achieving meaningful environmental gains.

Additionally, EVs contribute to greater tyre wear due to their heavier weight, frequent stop-start driving in our traffic conditions, and high torque delivery. This not only increases maintenance costs for owners but also raises environmental concerns, as tyre particles are a source of microplastic pollution.

Furthermore, there appears to be a potential conflict of interest in these policies, given that the Government of Jersey owns 62% of the ordinary share capital in Jersey Electricity plc, the island's sole electricity provider. Promoting widespread EV adoption would significantly increase electricity demand and, consequently, revenue for Jersey Electricity directly benefiting the Government's substantial shareholding. This financial interest warrants careful scrutiny to ensure policies are driven purely by environmental and islander welfare considerations.

To better understand the basis for these policies in our local context, I would be grateful if

you could share or direct me to any environmental modelling conducted by the Government. Specifically, this should include lifecycle analyses comparing EVs, hybrids, and ICE vehicles, taking into account Jersey's average annual mileage versus the typical break-even mileage required for EVs and hybrids to achieve net CO<sub>2</sub> savings over their lifespan (including battery production, usage, and end-of-life).

As a more balanced and island-appropriate alternative, I suggest the Government consider introducing a Channel Islands inter-island vehicle reuse incentive. Vehicles that have been previously registered and used in Guernsey or Alderney (for at least 12 months) could qualify for significant VED relief when transferred to Jersey. For example, a full VED waiver for the first two years, followed by partial relief thereafter, provided the vehicle passes local safety and emissions checks.

This policy would promote the reuse of existing cars across the Channel Islands, reduce the overall number of new vehicles imported into our islands (and the associated manufacturing and shipping emissions), and help keep motoring more affordable for residents without relying solely on expensive new EVs or hybrids.

I urge you, as Minister for the Environment, to review these policies with Jersey's specific context in mind. Perhaps incentives could be adjusted to better suit low-mileage users, or alternative low-emission options explored that do not impose such high upfront costs or potential conflicts.

I would greatly appreciate your thoughts on this matter and any steps being taken to address these issues.

Thank you for your time and dedication to our island's future.

Best,

[TEXT REDACTED]

## **009 – Figaro Owners Club**

### **CARBON NEUTRAL JERSEY 2030**

In keeping with the Figaro Owner’s Club aims and objectives, we raise concerns on behalf of our members, about the planned phase out of petrol and diesel vehicles from 2030.

As a club we have actively supported the Jersey economy through attendance to many events, including our own Rally on the Island just a few years back.

As a club are concerned that the proposed changes would:

- Impact on the mental health of current owners who love their cars and the joy they spread with other on-lookers.
- Impact on current owners from being able to sustain the heritage of the cars due to the loss of infrastructure and businesses supporting older vehicles.
- Prevent those who would also wish to see the Figaro marque sustainably retained on the roads, from having that choice.
- Prevent those who wish to own a Figaro from having the choice to own one.
- Severely impact engagement with younger prospective owners.
- See the end to the heritage and legacy of older vehicles, ending the viability of car clubs and events including the Jersey International Motoring Festival with over 35,000 visitors.
- Setting the threshold at 50 years on Jersey is substantially out of step with conventional interpretation of what is considered to be a heritage car.

There are differing views on the environmental impact of cars that already exist, but note moves away from all out bans, most recently the EU. For Figaro Owners Club members, the Nissan Figaro, manufactured in 1991 with a mere 1.0 litre engine, has very little environmental impact.

We ask the Government of Jersey to withdraw these plans, and demonstrate support for the culture and heritage of Figaro Owners Club members, and the broader car club community.

Sincerely

[TEXT REDACTED]

Chair, Figaro Owners Club

[TEXT REDACTED]

**010 – Individual**

Thank you for ensuring my attendance to last night's event, I found it incredibly insightful. I am highly supportive of reducing carbon emissions, and whilst I feel there are other Government departments that could make greater strides to supporting this, I am very interested in this particular aspect as an owner of a classic car (Nissan Figaro, one of a small number produced in 1991, running on 99RON fuel) and a diesel Range Rover that will need to be replaced in the not too distant future, and like many others, have concerns over the longevity of EV batteries.

I would like to be considered for the working group, if possible. With no disrespect intended to those attending, it was predominantly a white, male, and middle aged population, I would like to represent from a female and differing viewpoint, if possible.

Kind regards

[TEXT REDACTED]

## 012 – Individual

Dear Minister,

NB: I have copied in [TEXT REDACTED] at all island media to ensure transparency is upheld.

Following the consultation meeting I attended last Monday, I would like to draw your attention to the below articles easily available online. This is one reason why other governments are delaying the implementation of phasing out ICE cars and now looking at the fuel that drives cars as opposed to dictating that everyone should be buying one type of car, i.e. EVs.

Certainly the overall view is that 2030 is far too early to be focusing on EV cars only as the future of car transport, which does mean that Jersey residents would be disadvantaged in relation to choice of new and used cars if you proceed with your plans. As such car companies are no longer just focusing on EV cars only.

I look forward to your response.

Here are the companies heavily focusing on or recommitting to ICE vehicles:

- Stellantis: The automotive giant, which owns brands like Jeep, Ram, Dodge, Fiat, and Peugeot, recently announced a \$6 billion investment in ICE development. Despite their EV goals, they are hedging by upgrading their combustion engine lineup.
- Volkswagen Group (VW, Skoda): Despite a 2033 target to be fully electric in Europe, Volkswagen is redirecting some of its EV budget to improve the competitiveness of its ICE products. Skoda is updating its ICE lineup (Octavia, Kamiq, Scala) and taking over responsibility for a new generation of EA211 engines for the group.
- Porsche: Contrary to earlier, faster electrification plans, Porsche is developing new, updated ICE variants of its core models (Cayenne, Panamera) due to slower-than-expected demand for luxury EVs, particularly in China.
- BMW: The company is focusing on making its remaining ICE vehicles look, feel, and function more like EVs, focusing on a "plug-in hybrid" and "intelligent ICE" approach rather than going all-electric immediately.
- Ford: Ford has structurally separated its business into Ford Blue (focused on ICE and hybrid vehicles) and Ford Model e (dedicated to electric vehicles). Ford Blue focuses on maximizing profitability from iconic, established gasoline-powered vehicles.
- Toyota: A vocal proponent of a multi-pathway strategy, Toyota continues to push hybrids and advanced ICE technology as a more practical alternative to BEVs for many consumers.
- Chinese Automakers (MG/SAIC, BYD): While huge in EVs, Chinese firms like MG (owned by SAIC) are seeing massive success in Europe with hybrid and ICE models, with sales more than doubling in some markets in early 2025.

Key Trends Driving Continued ICE Focus:

- "Equal Intelligence" for Oil and Electric: Companies are upgrading ICE models with the same digital, AI-driven, and "smart" features found in EVs to keep them attractive.
- Hybrid Growth: Many consumers are opting for plug-in hybrids (PHEVs) over battery electric vehicles (BEVs), leading to increased investment in these technologies.
- Slowdown in EV Demand: Slower than expected EV adoption in the US and Europe has forced manufacturers to extend the life of their combustion engine portfolios.

Also, in relation to limited production cars, this is the UK's stance which for some reason you want to ignore, which also doesn't seem fair to the Jersey consumer. And this stance will have a very negative impact on the Island's motor sport scene.

- Exemptions from Regulations: Recognising the unique challenges faced by specialized manufacturers, the UK government has granted exemptions to small and micro-volume makers (like Morgan, Caterham, and Ariel) from certain upcoming bans, such as the 2030 Zero Emission Vehicle mandate, allowing them to continue producing internal combustion engine cars for longer.

Best,

[TEXT REDACTED]

**013 – Individual**

ATT: Environment and Climate at The Cabinet Office

I have had several communications with [TEXT REDACTED] regarding this lunatic policy. None of what he said managed to convince me that human CO2 emissions is a bad thing for the planet. If anything, it is positive.

I refer to the Trump administration's report- A Critical Review of the Impacts of Greenhouse Gas Emissions.

1. Elevated concentrations of CO2 directly enhance plant growth, globally contributing to “greening” the planet and increasing agricultural productivity, which is a positive thing.
2. Attribution of climate change or extreme weather events to human CO2 emissions is challenged by natural climate variability, data limitations, and inherent model deficiencies.

Moreover, solar activity's contribution to the late 20th century warming might be underestimated.

Both models and experience suggest that CO2-induced warming might be less damaging economically than commonly believed, and excessively aggressive mitigation policies could prove more detrimental than beneficial.

Social Cost of Carbon estimates, which attempt to quantify the economic damage of CO2 emissions, are highly sensitive to their underlying assumptions and so provide limited independent information.

Therefore, I am certain this policy to phase out petrol and diesel vehicles is excessively aggressive. I personally have no issues with electric vehicles, but it shouldn't be forced and there is certainly no need to phase out petrol and diesel vehicles when a little bit more CO2 could contribute to more greening of the planet. Individuals should be entitled to choose what mode of energy works for them, and make independent choices. Competition is a good thing!

Best wishes

[TEXT REDACTED]

**014 – Individual**

There is a raft of evidence from a number of reliable sources that disprove the notion of a climate emergency relating to CO2 emissions.

I would be very surprised if your office hasn't studied these documents.

The real emergency for Jersey is the lack of food security in the event of a more likely event as result of what's currently going on with space weather - CME's, solar flares, the possibility of another Carrington event (last one in 1859).

This is where the focus of your attention should be rather than the ridiculous notion of phasing out petrol and diesel cars as a way to protect the community.

Your faithfully

[TEXT REDACTED]

### **016 – Individual**

I have read the proposed changes to combustion engine vehicles. I am flabbergasted that an Island that has a negligible carbon footprint is looking to disadvantage its tax paying citizens once again.

Whilst the measurable carbon emitters of USA , China , Russia and India emit even higher carbon emissions the Government's response in cutting emissions here is laughable.

It makes not one bit of difference to the world carbon footprint with major powers emitting higher levels than ever.

The costs of this to the Island of stopping combustion engines has not been articulated nor the real cost of manufacturing these electric cars including their batteries. Or indeed the cost of disposal and of batteries and cars in the future - Who will pay and how will these be dealt with. We already have toxic waste built up on the island which cannot be exported , so we will just add to the toxicity of the chemicals / pollutants on the island.

We are already seeing the major car producers pulling back from electric models given the cost of these vehicles and the fact there is a shrinking market for them and no infrastructure to support them.

We are seeing the development of biofuels with many combustion engines being converted to in the future , just as with the move from leaded to unleaded petrol. This is far more environmentally friendly than electric cars and less impactful economically.

It seems to me this is yet another case of political niceties ( already out of date) over, looking at practical matters and economic considerations for the future.

The production of totally clean combustion fuels is moving at such a pace that we are at serious threat of making the island a more expensive place to live.

Many western Governments are pushing back timelines for compliance with carbon footprint emissions already and I suspect this will gain pace. The economic viability of countries cannot cope with these plans.

This is a seriously poorly thought out policy which is not in step with changing views across the world. The Jersey carbon footprint doesnt even register , yet we want to add to the cost burden on an island which is already struggling - madness!

[TEXT REDACTED]

### **017 – Individual**

With the above date fast approaching it was time to have an Island wide forum on this matter.

1. Why is the Island Government so hell bent on this ridiculous policy. We are a tiny island with quite honestly a negligible affect on the so called Global Warming Nonsense.
2. Other major countries/continents will continue to produce and use petroleum and diesel vehicles well beyond 2030. Those continents will continue to contribute heavily toward the so called green house effects. They won't give a monkeys about the affect they are having on the worlds atmosphere. Jersey should be one of the last places on earth to introduce this ludicrously expensive and unnecessary folie.
3. Is this being introduced because Jersey thinks it will have prestige of claiming we were the first to get to be so called carbon neutral in the world. Or is it so that the Jersey Electric Company can monopolise the prices they charge, which are already some of the highest in the world ?
4. The Island is already gaining a reputation for being run by a bunch of idiots. We are in danger of enhancing those attitudes.
5. This policy should be put in the place it deserves, the biggest bin possible. The policy should be individual choice, if you want and can afford to run an all electric/ hydrogen vehicle and that is what you choose then so be it. Otherwise we should be free to continue to buy and drive petrol and diesel vehicles as well. Or maybe the powers that be want the island to go back to the dark ages of horse and carts and bicycles.
6. Dump this ridiculous nonsense before the Island sees a mass evacuation of its population so we are able to have the options other in this world will have.

## **019 – Individual**

### **Introduction**

I am writing in response to the consultation on the proposed 2030 petrol and diesel vehicle phase-out in Jersey. I do not support the proposal as currently designed and believe it is premature, disproportionate, and risks significant unintended consequences for Islanders, businesses, and the wider economy.

### **1. Overall position on the phase-out**

The proposal to prohibit the import and first registration of petrol and diesel cars from 2030, followed by hybrids and small vans from 2035, and all remaining petrol/diesel vehicles thereafter, is too rigid for a small, isolated jurisdiction with unique transport needs. While I support realistic, cost-effective measures to reduce emissions, a hard legal ban on specific technologies at fixed dates is an inflexible tool for an area where vehicles are typically low-mileage and retained for longer periods than in larger jurisdictions.

Jersey already shows a downward trend in road transport emissions, with a reported 26% reduction since 1990 (a fall of almost 34,500 tonnes over 33 years). This indicates that incremental improvements in vehicle efficiency, behaviour change, and existing policies are delivering results without the need for a blanket prohibition on future petrol and diesel imports.

Our family are on our 3rd fully electric car, and also have a PHEV, which we use with a home charger installed many years ago.

### **2. Jersey's specific context and proportionality**

The consultation paper acknowledges that Jersey vehicles tend to have low mileage and last longer than those in larger jurisdictions such as the UK. This is a critical point: if vehicles are driven fewer miles, the lifecycle emissions of a modern efficient petrol or diesel car may be far lower than in high-mileage environments. Imposing a hard stop on the import of such vehicles therefore has less environmental benefit here than the headline figures suggest.

Furthermore:

- Road transport accounts for 27% of Jersey's greenhouse gas emissions, around 97,000 tonnes in 2023, with car journeys responsible for just over 91,000 tonnes. Tackling this share is important, but doing so through a technology-ban approach places a disproportionate share of the burden on private motorists and small businesses.
- Jersey's small land mass and limited public transport options mean personal vehicles are often a necessity rather than a luxury, especially outside central areas and for shift workers, carers, and tradespeople.

A more proportionate strategy would focus on:

- Continued improvements in fuel efficiency and emissions standards for all vehicles.
- Encouraging uptake of lower-emission vehicles through incentives and infrastructure, rather than prohibition.
- Measures to reduce unnecessary journeys and improve traffic flow, which can lower emissions from the existing fleet.

### **3. Affordability and social equity**

The proposal risks embedding a two-tier transport system, where those who can afford an electric vehicle (EV) benefit from grants and infrastructure, while others are increasingly constrained in their choices and exposed to rising costs.

The consultation highlights:

- A £700 grant to help individuals and businesses buy a private EV charger.
- Over 3,700 full electric and 4,400 hybrid vehicles already registered as at June 2025.

However, these figures need to be set against:

- The purchase cost of EVs, which remains significantly higher than many used petrol and diesel vehicles that Islanders rely on.
- The fact that 40–50% of vehicles imported to Jersey each year are used vehicles. Including used vehicles in the phase-out will severely restrict access to affordable transport for lower-income households who cannot buy new.

By explicitly including used vehicles within the scope, the policy removes a key affordability safety valve. This is likely to:

- Push up prices of the remaining petrol/diesel stock on-Island.
- Reduce mobility options for those who cannot afford newer EVs.
- Place particular pressure on younger drivers, families, and lower-income workers.

A fairer approach would:

- Exclude used vehicles from the immediate phase-out, at least during an initial period, or
- Use differentiated timelines and thresholds for used vehicles to allow the market and technology to mature further before closing off this essential affordability channel.

The rise of VED has already destroyed the vintage/collector car market in Jersey, an unintended consequence I am sure of a rigid policy with little nuance.

#### **4. Practical concerns: infrastructure, resilience, and lifecycle issues**

The consultation rightly notes that phasing out petrol and diesel vehicles will require significant investment in charging infrastructure and grid capacity. However, committing to a legal ban before these systems are fully proven risks creating vulnerabilities. As a current user of the Evolve network, I can attest to its inability to service the current levels of EV ownership and also that it is expensive (thus removing an incentive to use EVs).

The paper itself states that:

- The Evolve public charger network currently has over 100 charging points, with plans for further development.
- Jersey Electricity is investing in “The Big Upgrade” to increase the Island’s power network capacity to support electrification of transport and heating.

Key concerns:

##### **1. Grid and supply resilience**

Relying increasingly on electricity for both transport and heating concentrates risk into a single energy vector. Any major outage or supply issue would have a much more severe impact if a large proportion of vehicles are electric. The phase-out proposal does not

adequately address how energy security, redundancy, and emergency planning will be maintained and tested in an EV-dominated system.

## 2. Charging availability and practicality

Many Islanders do not have off-street parking or a dedicated driveway, making home charging impractical. Even with public chargers, there are concerns about:

- Availability at peak times.
- Queuing and congestion at charging sites.
- Reliability and maintenance of the charging network.

## 3. End-of-life vehicle and battery management

The consultation notes that Government is “working to ensure” access to disposal and recycling facilities for end-of-life EVs and batteries, and that manufacturers have producer responsibility. This is still an emerging field, especially in small jurisdictions. Locking in a rapid acceleration of EV uptake without fully developed local or regional solutions for end-of-life treatment risks shifting environmental problems into the future (battery waste, shipping of hazardous materials, etc.).

Taken together, these factors suggest that infrastructure and lifecycle issues should be fully resolved and stress-tested before hard end-dates are legislated.

## 5. Alignment with the UK and loss of local flexibility

One of the stated principles is that Jersey should be “strongly aligned with the UK’s timetable for phasing-out petrol and diesel vehicles.” While alignment can bring benefits, it should not override local needs or reduce policy autonomy.

Almost all vehicles imported to Jersey originate from the UK market, and the UK’s Zero Emission Vehicle mandate will shape what is available anyway. This means that, in practice, the range of petrol and diesel options will reduce over time regardless of Jersey legislation. A Jersey-specific legal ban therefore risks being redundant in some areas, while still imposing rigidity and removing flexibility.

Given our different scale, geography, and transport patterns, Jersey should retain the option to:

- Allow limited, targeted imports of efficient petrol/diesel or hybrid vehicles where appropriate (for example, specialist vehicles, specific business needs, or where EV alternatives are not viable).
- Adjust timelines or exemptions in response to technological, economic, or infrastructural developments.

By locking in dates now, the Island reduces its ability to adapt to unforeseen changes, including potential future improvements in low-carbon liquid fuels, hybrid technologies, or other innovations that could deliver emissions reductions without requiring a full shift to battery EVs.

## 6. Alternative approach and recommendations

Instead of the proposed phase-out, I would support a revised approach that:

### 1. Uses incentives rather than bans

- Maintain and expand grants like the £700 EV charger incentive but couple them with means-tested support for lower-income households.

- Offer tax or duty advantages for demonstrably low--emission vehicles across all technologies, not just pure EVs.
2. Focuses on outcomes, not specific technologies
    - Set ambitious but realistic CO<sub>2</sub>per-kilometre targets for new registrations, allowing manufacturers and consumers to choose the most suitable technology to meet those standards.
    - Reward vehicles (including modern petrol, diesel, hybrid, and alternative fuels) that meet stringent emissions thresholds, rather than banning them outright.
  3. Protects affordability and choice, particularly around used vehicles
    - Remove used vehicles from the immediate scope of the phase-out, or
    - Introduce a longer transition for used imports, aligned with demonstrable improvements in EV affordability and availability.
  4. Ensures infrastructure and resilience first
    - Set clear, evidence-based milestones for grid upgrades, charging coverage, and end-of-life systems and only consider further restrictions when these are demonstrably in place and reliable.
  5. Maintains flexibility for specialist and commercial users
    - Provide broad, clearly defined exemptions for sectors where EV options remain limited or unsuitable (certain trades, emergency services, rural and agricultural uses, towing, etc.).

## **Conclusion**

Despite being an early adopter of EVs, for the reasons above, I do not support the proposed phase-out of petrol and diesel vehicles in its current form. While I recognise the importance of reducing emissions and meeting Jersey's net zero 2050 target, a blanket ban on vehicle types at fixed dates is not the most proportionate, resilient, or socially fair way to achieve these goals in our particular context.

I urge the Government to reconsider the approach, moving away from rigid technology bans towards a more flexible, evidence-based framework that:

- Prioritises real-world emissions reductions over symbolic deadlines.
- Protects affordability and choice for Islanders.
- Ensures infrastructure and energy resilience are proven before mandating a rapid shift.
- Retains Jersey's ability to adapt policy as technology and circumstances evolve.

Government should be making life easier for islanders, not more difficult.

Yours faithfully,

[TEXT REDACTED]

**020 - Individual**

Please be aware that the older generation more than any other group are dependant on individual cars for lifeline connections, let alone medical trips. This group also are not always the most affluent or as confident with new technologies. Therefore should there be some level of age / means testing ? Electric vehicles are prohibitively expensive even 2nd hand as are battery / parts replacements . Bear this in mind when considering law changes and reducing parking / vehicle access

**021 – Individual**

Unfortunately a bit behind but I have just completed the survey, and unfortunately Jersey needs to be careful what they set up , otherwise they will be left high and dry depending on the uk decisions, if there was any space on the working group I would be interested in joining, many thanks

[TEXT REDACTED]

**022 – Individual**

Dear Sirs.

I note that the proposed policy is to align with the UK . There is some speculation that the UK , in view of practical considerations, may change their policy to align with Europe. If this is the case, I presume that our policy should also change to ensure that Jersey is not at a disadvantage to the rest of Europe.

The proposed policy for Jersey includes the ban on importation of almost all used petrol & diesel vehicles after 2030, which does not align with the UK proposal where no such ban applies. There should be the opportunity for Jersey residents to be able to choose a pre-2030 car, in the same way as any other UK or EU resident. The claim that Jersey would become a “dumping ground” is invalid as we would be in the same situation as the UK with regard to the requirement of all new vehicles after 2030. The proposed policy also restricts the ability to import both classic & more modern collectable vehicles. The numbers involved are insignificant overall & are only used infrequently, however, it will be significant for enthusiasts, whether they are owners, locals or tourists attending car events.

I also have strong reservations about the ability to provide a robust & practical network of public ev charging points within this tight schedule, bearing in mind that the majority of Jersey residents will not have access to their own electricity supply. The inconvenience & cost for individuals using public charging points should be a significant consideration when deciding on a timescale as it would only be the most fortunate in our society who could benefit from their own charging facility.

I trust that the disruption caused by new electricity cabling, & the structural impact of additional very heavy vehicles upon highways & multi storey car parks, will also be evaluated.

I hope you will give the above submission your thoughtful attention, particularly bearing in mind the potential adverse effects on the majority of Jersey residents.

Yours faithfully,  
[TEXT REDACTED]

## 024 – Le Riche Automobile Restorers

### Proposed Jersey 2030 Phase-out new & used IC vehicles

#### General principles

- The EV fallacy

There is an assumption that electric vehicles will take you to a net zero position.

They don't - vast amounts of energy and resource (all generating CO<sub>2</sub>) are used in the construction of every new vehicle and its battery pack. Not all electricity generation (for subsequent charging purposes) is wholly 'green' either.

The only local advantage is that of reduced tailpipe emissions.

- The 'greenest' vehicle is an existing one

The 'greenest' vehicle is one that has already been built - its initial CO<sub>2</sub> emissions (on manufacture) are already out there (and might even be reduced if atmospheric CO<sub>2</sub> capture techniques improve).

An older car can continue in use for a long time before its tailpipe emissions get anywhere near the amount of CO<sub>2</sub> generated in the construction of a new vehicle (IC or electric).

Maintain and conserve is the greenest option (which can apply across many sectors of life).

Together with the use of sustainable fuels, the current environmental impact of IC vehicles can be reduced further.

- Jersey's scale and global context

In global terms, Jersey's carbon footprint is miniscule (easily classified as insignificant).

Whilst it is of course a good thing to be environmentally aware and diligent, there is no need and no value in the island trying to take a lead over other, much larger and more significant jurisdictions. It is these countries which will set the general tone of the response to reduction in CO<sub>2</sub> generation.

- Public appetite for EVs

There are some distinct disadvantages to EVs in comparison to IC vehicles.

- a) EV's remain expensive to purchase in the first instance and battery replacement is costly. They do not hold their value well and have a low resale value, in some cases no value at all.
- b) When purchasing a new vehicle with UK/foreign travel in mind, very careful planning and considerable extra time is required, as the EV charging infrastructure in the UK and Europe remains quite limited and current indications do not suggest there will be a particularly rapid growth in availability.

It is recognised however, that battery technology is advancing and the above disadvantages may be at least partially mitigated in the fullness of time. Whether by 2030 is unknown.

- Local infrastructure provision

Just 116 public EV charging points exist currently, whilst many thousands of local vehicle owners only have access to on-street parking.

Is it serious to contend that the island will be in a place to accommodate these 'on-street' owners with sufficient EV charging points to permit a wholesale move to electric vehicles come 2030?

A 'chicken & egg' situation exists – the JEC will install more public charge points if demand exists; demand for EVs is likely to be limited if there is a shortage of public charging points.

(No solution is offered in the government consultation paper).

Proposed Policy document specifics

- Phase-out principle 1

**The Jersey phase-out policy identifies that “Jersey has committed to achieving net zero carbon emissions by 2050. Road transport accounted for 27% of the Island's emissions in 2023.”**

What of the other 73% of Island emissions? Are there other (restrictive) policies in hand for 2030?

For example – aviation & marine traffic emissions. Household heating etc.

It feels like vehicle owners are being specifically singled out. Perhaps they are seen as an easy target?

- Phasing-out NEW cars and small vans

**The Jersey phase-out policy proposes phasing-out the importation and registration of NEW petrol and diesel vehicles in 2030, in line with UK government policy.**

The Jersey proposals need to recognise that the UK/European stances are not wholly fixed (UK government policy can change overnight!). The EU is facing strong opposition from European manufacturers to move the 2030 date back to 2035 – and are actively considering this.

A premature phase-out requirement (set in legislative stone) may place Jersey at odds with actual UK/European vehicle retail policy in 2030.

Will the UK actually implement their proposed changes in 2030?

- Phasing-out USED vehicles

**The Jersey phase-out policy includes proposals for phasing-out the importation and registration of USED cars and small vans from 2030.**

This does not follow UK policy and there is no logical or valid reason for Jersey to be different. The supply of used IC vehicles will naturally dwindle over time and any that remain long term will likely be cherished classic or collectors' vehicles (and so be well maintained, with limited usage).

**The Island could also become a dumping ground for vehicles that can no longer be sold elsewhere.**

This seems a perverse conclusion to draw.

There are only a limited number of other markets for which right hand drive vehicles are manufactured.

It is not logical to assume that any vehicle manufacturer will bother trying to service the very small car market in Jersey. For secondhand cars – could there ever be a commercial justification for importing vehicles from South Africa, Australia, India and Japan?

- Proposed exemptions to the 2030 phase-out

**a) "Cars already owned by individuals who are moving to live in Jersey (subject to conditions)"**

The "conditions" are not identified. If a new resident is able to import a used vehicle and the same used vehicle option is not available to an existing resident, you are creating an illogical and discriminatory situation.

**b) "Cars over 50 years old"**

This should be at very most 25 years of age (assumed it will be on a rolling year basis) - and many classic/collectors' vehicles are younger even than this.

The local '50-year rule' in respect of classic car exemption was implemented without consultation some 10 years ago. It does not align with any other jurisdiction. Why is Jersey set on being different in this respect? (The UK import tax threshold is 30 years; MOT and road tax exemption at 40 years).

- Proposed additions to 2030 phase-out

**It is proposed that Jersey's 2030 phase-out should NOT exempt the importation and registration of pure petrol and diesel cars produced by these manufacturers or pure petrol and diesel kit cars.**

*(The UK government has included exemptions designed to support specific types of manufacturers located in the UK, by giving them until 2035 to fully transition to producing zero emission vehicles).*

What valid reason is there for Jersey to deviate from the UK's policy?

### Alternatives

- Is there any need for a Jersey-specific policy?

Whilst it is acknowledged that reducing CO2 emissions (and generally encouraging a 'greener' lifestyle) is a worthy move, why does Jersey need to introduce specific legislation? And why now?

Technology is advancing and other, possibly better and greener options may appear in the relatively near future, which render sole reliance on EVs unnecessary and even restrictive.

Other, more significant vehicle markets and jurisdictions will determine the power sources vehicle manufacturers will provide in response to reducing CO2 production and Jersey will automatically piggy-back off these moves. (The UK being the main driver for the Channel Islands). There is no need to artificially constrict options for Jersey consumers at this point - or ever.

- Sustainable fuels

IC vehicles may be run on sustainable fuels, e.g. Sustain, which are already available in the island, rather than continue with fossil fuels.

Current high purchase cost is an issue and will be a limiting factor. It is believed there is currently a government-funded subsidy for alternative diesel fuels. Is any consideration being given to the possibility of a duty reduction for other sustainable fuels?

NB. Sustain fuels clarification:

"Our core range utilises advanced second-generation biofuel, with a range of sustainable content volumes on offer up to 100%. This is manufactured from agricultural waste, such as straw, by-products or waste from crops which wouldn't be used for consumption. By doing so, the fuel utilises the carbon that already exists in our atmosphere, which the plants absorb as they grow, recycling it, rather than releasing additional CO2 that is currently locked underground in fossil fuel."

So, tailpipe emissions are broadly similar to fossil fuel IC.

### Le Riche Automobile Restorers (CI) Ltd – specific issues

A significant proportion of the LRAR business involves trading pre-owned vehicles – vintage, classic and collector's cars – all IC powered. This includes the sourcing and importation of such vehicles to the island as well as trading within the island and occasional export of same. Further significant revenue is derived from the repair, restoration and on-going maintenance of classic/collectible vehicles newly arrived in the island.

The proposed policy of disallowing the re-registration of such used vehicles post 2030 will certainly have a wholly negative impact on this element of our business and the overall enterprise. We would likely have to scale back operations, or possibly close down altogether.

**026 – Individual**

Hi there

Re 2030 phase out of petrol diesel vehicles to jersey from 2030 I have the following points to make .

Firstly as jersey is a small island surrounded in sea air constantly refreshed by sea breeze we don't have city pollution or smog so very pointless is trying to achieve what we already have .

Secondly UK and the rest of the world and vehicle manufacturers go with public demand ie there in business to make money and wouldn't for one minute to listen to jersey being a tiny dot in the world of the proposal.

Next having only mainly EV vehicles the knock on effect of garages , repair shops , garage forecourts will all have redundancy in future with less staff required.

Then the duty and taxes received from fuel will be in fast decline so where is this short fall going to come from?.

Next a large proportion of homes in jersey doesn't have parking area to accommodate a home charger for Ev vehicles so then you will need to fit a charger facility to every public car parking space and every space in a multistorey car park who's paying for this and where is all this power coming from ?

Next you seem to have over looked human rights and discrimination on choice by controlling people's choices.

According to vehicle manufacturers they are now not meeting the proposal for any countries and intend to lower carbon emissions on all vehicles manufactured from 2030 or maybe extending to 2035 at present.

On a final note the proposal seems half harterly put together without consideration on the knock on effect to the population of jersey .

Regards [TEXT REDACTED]

## **027 – Individual**

[TEXT REDACTED]

Dear Sir/Madam,

I am writing to express my strong objection to the Government of Jersey's proposal to prohibit the sale of new petrol and diesel vehicles from 2030. In my opinion, the policy is being pushed forward without the necessary economic cost-benefit assessment. It also represents a clear restriction on consumer choice and an infringement on islanders' personal rights.

### **1. Jersey's Charging Infrastructure Is Far Below Requirements**

It is well documented that Jersey would require thousands of public and private charging points to support a full transition to EVs. It seems unrealistic to mandate EV adoption before providing the infrastructure that would make EV ownership remotely viable for everyone. Taking the required investment into account, is this policy actually beneficial?

### **2. EV Costs Remain Significantly Higher**

The average price of a new electric vehicle is £10,000–£15,000 higher than an equivalent petrol or diesel model. Used EVs sales are difficult due to the risk and cost of battery failure. To make matters worse, faulty or end-of-life batteries incur high disposal costs, and battery replacement can exceed £8,000–£12,000.

A new EV typically costs £35,000–£50,000, compared with £18,000–£28,000 for a petrol or diesel car. Many vehicle owners could afford to replace older, more polluting vehicles with new petrol or diesel models, but not with far more expensive EVs. If no choice is available, these older, higher-emission vehicles will likely remain in use for longer.

### **3. EV Fire Risks, Ferry Travel, Accidents, and Vehicle Weight**

A shift to EVs without adequate fire-response solutions is irresponsible. In my opinion, it is also unsafe to allow electric vehicles on passenger ferries. The worst-case scenario is a fire at sea, and yet when travelling to France or the UK I am expected to accept this known risk—despite the fact that EV fires cannot be extinguished using conventional methods.

The weight of EVs results in increased tyre wear and a significantly higher risk of injury in collisions due to the greater mass of the vehicle. Have our multi-storey car parks been assessed to determine whether they can safely support the additional weight of EVs? They were certainly never designed for such loads. Fire risks in multi-storey car parks are also deeply concerning. Charging areas are typically located on lower floors, which would impede evacuation of vehicles from upper levels. As I understand it, the Fire Service is dreading the prospect of an EV fire in a car park, as they do not currently have the resources to deal with such an incident effectively.

### **4. Environmental Benefits Are Misleading**

Although EVs produce no tailpipe emissions, their overall lifecycle emissions are far from zero. Figures suggest that battery production generates two to three times more CO<sub>2</sub> than manufacturing a petrol or diesel engine. The largest carbon footprint is created when purchasing a new vehicle, yet new EV sales are being encouraged.

Scrapping perfectly functional petrol and diesel cars is becoming common practice under the false belief that this helps the planet—yet this practice is actively encouraged and even incentivised. Where is the evidence supporting Jersey's approach to banning petrol and diesel

vehicles that proves, beyond doubt, that such a policy will deliver meaningful progress toward net zero?

### **5. Commercial and Rural Users Will Struggle**

Many tradespeople, farmers, and rural businesses rely on vehicles that EVs cannot yet replace. Towing capacity is reduced in EVs, and range can drop by 30–50% when towing or carrying heavy loads. Cold weather can reduce EV range by up to 40%, and using heating or air conditioning further drains the battery. Charging downtime is incompatible with commercial timeframes and rapid response requirements. The weight of batteries also affect commercial vehicle payloads. For instance this results in more trips required to carry out disposal of waste to the recycling centre. There is an irony here!

### **6. Power Cuts**

This policy fails to acknowledge the over-reliance on electricity required to charge EVs. What happens if there is an energy crisis in Europe, or if the cable from France is sabotaged?

### **7. Duty on Fuel**

There is also the matter of fuel duty. Where will EVs contribute to the tax system? Are we simply ignoring the negative impact this policy will have on garages and forecourts? Reduced fuel sales will inevitably lead to redundancies as some businesses fail.

### **Conclusion**

The evidence is clear: Jersey does not have the infrastructure, funding, or environmental justification to support a 2030 ban on new petrol and diesel vehicles. Why burden taxpayers with further investment requirements and force consumers into higher-cost options merely for a “feel-good” policy? The obsession with reducing carbon footprints while simultaneously damaging our economy through rising energy costs is irrational. Tax revenue must be prioritised for essential projects such as the hospital and the neglected mains drainage systems.

The Government must abandon the 2030 prohibition and instead adopt a risk-based approach that considers future alternatives, including hydrogen-powered vehicles. It is unrealistic—and frankly arrogant—to believe that a small island like Jersey can meaningfully influence global emissions. Any initiatives we undertake are eclipsed by industrial-scale emissions from larger nations.

Yours sincerely,

[TEXT REDACTED]

**029 – Individual**

Hello

I apologise that I am two days late to submit this response. I was travelling.

Please can you kindly record my strong opposition to the proposed phase out.

Regards

[TEXT REDACTED]

**030 – Individual**

[TEXT REDACTED]

**Submission on the Proposed Phasing out of Petrol and Diesel Vehicles by 2030**

Dear Sir/Madam,

In response to the above I would like to submit my views as a local motorhome owner on how I feel that some of the already imposed sanctions and charges on motorhomes in particular are both unjust and unfair.

As part of the road map towards net-zero carbon, the way in which Vehicle Emissions Duty (VED) is being imposed and increased annually is simply unfair on the motorhome fraternity in Jersey.

Although the importation of motorhomes is exempt from the current 2030 deadline as there are no similar, alternative electric vehicles at this time. However, even if there were in the future, an electric motorhome is likely to be way out of the financial reach of most people. The pool of decent second-hand motorhomes on the Island is fairly limited and restricted and therefore importing a second-hand vehicle is the only alternative for many local motorhome enthusiasts.

If one studies the figures on the Gov.je website for VED going back to 2024, the "Standard Vehicle" table which includes motorhomes, is charged at a much higher rate than "Commercial Vehicle" sector.

For example, in 2024 a motorhome between 2,501 cc and 3,000cc is charged at £2,125 whereas a "Commercial Vehicle" of the same size is charged at £1,073.10. A motorhome over 3,500cc is charged £7,937 but a "Commercial Vehicle" is charged £1,931.58.

In 2026 a motorhome between 2501 cc and 3,000cc is charged at £2,566 and a "Commercial Vehicle" of the same size is charged £1,141. A motorhome over 3,500cc is charged a staggering £12,401, whereas a "Commercial Vehicle" of the same size is charged £2,053.

In addition, an imported motorhome would also be liable to GST and any further expenses such as DVS inspections and possibly a P30 Permit which further restricts it's movements on the Island.

The obvious unfairness here is that motorhomes are used very little on the Island and personally apart from the occasional drive up the Five Mile Road to give it a run, the occasional trip to the garage for servicing and maybe a trip with the grandkids to one of the local campsites once a year, I would be surprised if I covered 100 miles a year on Jersey roads. Most of my mileage is spent driving in Europe which is what I bought the motorhome for, and especially as my wife suffers from severe arthritis and being able to load up the motorhome and just drive to the ferry is a God send for us.

Commercial vehicles on the other hand are likely to be used extensively on Island roads and would be polluting the environment far more than any motorhome.

At a recent meeting I attended at Highlands College involving motorsport and classic vehicle clubs on the Island, the Infrastructure Minister, Deputy Steve Luce admitted that certain vehicles should be exempt from a lot of the future proposals and restrictions on their use because of the limited amount they are actually driven on the Island.

In closing, I strongly feel that motorhomes also fall into this category and currently are being unfairly targeted for excessive VED etc.

Yours sincerely,  
[TEXT REDACTED]

### **031 – Business submission**

Policies have proven to be one of the most effective ways to support the shift away from fossil fuels and we believe an ambitious phase-out of petrol and diesel vehicles will have a positive impact towards Jersey's net-zero ambitions.

Due to its size and nature of lifestyle, Jersey is perfect for electric vehicles and to lead the way in electrification.

Change is slow and due the nature of driving in Jersey, vehicles have a longer lifespan, and as such an earlier phase-out of ICE vehicles is welcomed, to ensure the market picks up and adapts by 2050.

Early clarity is essential for local traders and motorists to make informed long-term investments. However, it is important that any guidance also takes into account international market volatility and the fragile nature of the current global economic climate, which in recent years has shown itself to be highly unpredictable. By providing a clear framework that acknowledges these external uncertainties, the Government can foster business confidence without being caught off guard by global shifts.

While Jersey's vehicle supply chain is inextricably linked to the UK, our unique geographic and operational environment allows us to be more agile. We believe Jersey should maintain the independence to lead, rather than just follow. The UK Government is influenced by wider political and economic pressures and has already adjusted its timetable several times. While aligning with UK policy may appear straightforward, doing so could expose Jersey to delays if the UK further changes direction. Given our scale and the slower pace at which change can be implemented, any delay in the UK's roadmap could disproportionately hinder Jersey's progress toward its Net-Zero commitments.

Jersey should be proactive in setting out which vehicles can and cannot be imported to the island. There are open market considerations at the level of what is meant by "which vehicles can and cannot...". The open market for vehicle dealers should not be hamstrung, but clear guidance in terms of vehicle age, safety requirements, and disposal opportunities and risks should be considered. The policies could also include the responsible parties for any situations that might arise from existing vehicles that need to be managed and disposed of.

We fully support the prioritisation of passenger cars and Light Commercial Vehicles (LCVs/small vans).

By focusing first on mainstream vehicle types where alternatives are proven, cost-effective, and readily accessible, while allowing additional time and tailored provisions for specialist vehicles that are still technologically or economically constrained - Jersey can secure a 'quick win' for the Carbon Neutral Roadmap.

For specialist and heavy-duty sectors, we advocate for a flexible approach that recognises the current global supply constraints and technological gaps. For these reasons, we believe that flexibility must be built into the phase-out strategy. This approach ensures progress without imposing disproportionate burdens on local organisations that rely on specialised equipment to operate effectively.

While we support these dates as a 'backstop,' we recommend that the Government continues to use Vehicle Emissions Duty (VED) and other fiscal levers to encourage Islanders to switch ahead of these deadlines where possible, ensuring Jersey remains a leader in the green transition rather than a passive follower.

Setting phase-out dates for used petrol and diesel vehicles is important, and we believe the timeline should recognise the valuable role that plug-in hybrid vehicles can play in the transition. Plug-in vehicles are a vital "reassurance technology" offering many of the benefits of electric driving while still providing the reassurance of a conventional engine. For motorists who are sceptical, uncertain, or concerned about range, these vehicles can serve as an effective stepping-stone into zero-emission transport.

Phasing out used plug-in hybrids too early may unintentionally reduce the availability of these transitional options, making it harder for some motorists to build confidence in electric mobility. A balanced approach—one that supports progress toward net-zero while still allowing plug-in hybrid vehicles to act as a bridge for those who need reassurance—would help maintain momentum without limiting choice or discouraging adoption.

Jersey is uniquely positioned to lead in electric transport. By focusing on a "right-tech, right-time" approach, we can ensure the grid remains resilient, the environment is protected, and no Islander is left behind in the transition to a carbon-neutral future.

We support the proposed exemptions as essential for a compassionate and inclusive transition. We specifically endorse protections for classic vehicles (50+ years), relocation imports, and adapted vehicles for individuals with disabilities, where zero-emission alternatives are not yet functionally or financially equivalent.

However, it is essential that clear standards are established to govern how these exemptions are applied, ensuring fairness and transparency. Equally important is the need for regular reviews of technological advancements, as innovations in low- and zero-emission technologies may gradually reduce the need for certain exemptions over time. We recommend a mandated biennial review of technological advancements to ensure that as specialist and accessible EV technology matures, these categories can be gradually integrated into the phase-out. This approach would allow Jersey to remain both practical and ambitious—supporting inclusivity while still progressing toward long-term net-zero goals.

We support the proposal that kit-cars and vehicles from micro- and small-volume manufacturers should not be exempt from the 2030 phase-out of new petrol and diesel vehicles. While we recognise the unique nature of these vehicles, we believe that allowing their continued importation would create a "policy loophole" that undermines the Island's carbon-neutral goals, effectively enabling continued importation of high-emission vehicles under the guise of niche or specialist production. This could be viewed as preferential treatment for those who can afford such vehicles, undermining the fairness and integrity of the overall transition strategy. A consistent approach across all new vehicle types will help ensure that the phase-out is both equitable and effective, preventing back-door routes that risk slowing progress toward Jersey's wider decarbonisation goals.

Given the highly specialised nature of parts of our fleet, we believe there should be limited exemptions in the first stage of the phase-out for vehicle types where no viable low- or zero-emission alternatives currently exist. These exemptions should focus strictly on essential specialist vehicles that require specific performance, configuration, or operational capabilities not yet supported by emerging technologies. Any exemptions should be tightly defined, regularly reviewed, and reduced over time as technological advancements make suitable alternatives available.

From a general fleet perspective, we are well-positioned for the 2030 phase-out, with our transition to electric vehicles already progressing in line with our strategic goals. While we are eager to lead this change, we recognise that certain specialised and bespoke vehicles present unique technical challenges. In these specific areas, where low-emission technology

is still maturing or carries a high cost-entry, a flexible approach will be essential to ensure a smooth transition. We remain fully committed to innovation, provided we can continue to prioritize the Island's energy security and the operational resilience of our mission critical services.

Overall, we support the direction and ambition of Jersey's proposed vehicle phase-out strategy and recognise its importance in meeting the island's long-term climate objectives. [Text redacted] we see this not merely as a shift in transport policy, but as a fundamental step toward a Carbon Neutral future.

Our responses highlight that while the transition is both necessary and achievable, success will depend on maintaining clear communication, flexible implementation, and an evidence-based approach that reflects technological progress.

In particular, we encourage the Government of Jersey to continue reviewing advancements in low- and zero-emission technologies, especially for specialist and adapted vehicles where suitable alternatives are still emerging. Ensuring that exemptions, timelines, and regulations evolve in line with real-world capability will help avoid unnecessary operational or financial burdens while keeping the island on track toward its net-zero commitments.

We welcome the opportunity to contribute to this consultation and remain committed to supporting a smooth, fair, and effective transition for the whole community.

### 032 – Business – IQ-EQ

**Subject:** Phasing-out of ICE 2030 - consultation / Corporate Service Providers

Dear [TEXT REDACTED],

Many thanks for your department's very useful presentation and workshop for car clubs which I attended on the 12<sup>th</sup> January, wearing my hat as a member of the [TEXT REDACTED], Car Club (660cc / 64bhp micro cars). I found the session extremely helpful, and I believe many others in attendance also valued the collaborative approach.

I am completing the consultation questionnaire, although in addition I would like to advise of a Financial Services consideration which would benefit from an specific exemption, as the cars in question won't be used at all on the island.

I am writing with a different hat on to the car clubs, albeit on the same subject matter. I head up the [TEXT REDACTED] division at IQ-EQ (a Corporate Service Provider/Trust Company), [TEXT REDACTED]. We are not brokers; instead, we independently assist clients with structuring and administering significant car collections. This includes creating and managing the first classic car investment fund and assisting non-residents clients with holding high-value vehicles (typically £[TEXT REDACTED] m+) through Channel Islands companies.

IQ-EQ supports this area because clients with £[TEXT REDACTED] m+ car collections typically have broader asset portfolios—assets that fall squarely within the core fiduciary services that the island provides.

Below is a broad summary of the proposition:

#### How the Structure Works

- Ownership requirement: A car registered in the Channel Islands must be owned either by a Channel Islands resident or by a Channel Islands company.
- Role of IQ-EQ:  
IQ-EQ (<https://iqeq.com>) is a global fiduciary and fund administration firm with 6,500 staff across 26 jurisdictions. Within our Private Wealth segment, here in Jersey, we have a dedicated Luxury Asset division. We can incorporate a Channel Islands company, wholly owned by the client, and provide officers, administration, and the registered office. The company then owns the vehicle(s).
- Tax position: Vehicles can be registered in the Islands without VAT/GST when owned by a Channel Islands company with a non-resident shareholder.
- Presence requirement: Cars must be physically located in the island for an aggregate of six months per year—not necessarily consecutive. Purpose-built storage facilities in the island provide secure and climate-controlled environments. Many clients use their cars during the summer months and store them in the islands during winter.
- Ongoing management: We coordinate all administration—insurance, compliance, maintenance, annual servicing, and all logistics—using specialist transporters such as [TEXT REDACTED].
- Practicality: Although the islands are a short ferry journey from the UK and France, most clients use covered transport rather than collect the vehicles personally.
- Usage rules: Use depends on the client's home tax residency. Cars can generally be used internationally for up to six months per year, excluding their home jurisdiction. Many of our clients from the US, Middle East, and Far East use their cars during European trips and then return them to storage.
- Comparison to bonded storage: The structure operates similarly to a bonded warehouse arrangement but with the key advantage that the car can be actively used abroad.

- Illustrative example: A £2,000,000 car purchased in the UK without incurring 20% VAT equates to a potential £400,000 saving. On resale, VAT would only be payable by a new owner intending to import the car into a VAT jurisdiction.
- Relationship with dealers: While we manage the fiduciary and administrative side, we partner with local dealers who handle any brokerage activity.
- Fees: We charge a company setup fee, followed by a fixed or hourly fee depending on the required level of administration.

#### Why This Benefits the Islands

Guernsey has historically been the principal hub for this activity, supported by its GST-free environment and its purpose-built storage facility accommodating around 200 cars.

The broader economic benefits to the Channel Islands include:

- Employment linked to building, operating, and securing the storage facilities
- Employment in logistics and transport of vehicles in and out of the island
- Revenue for Corporate Service Providers managing the companies
- Premium insurance revenues due to vehicle value
- Increased business for local dealerships (e.g., [TEXT REDACTED],) through servicing and occasional sales
- Significant VED and DVS inspection fees upon registration, which owners accept as part of the setup and ownership costs

#### Important Practical and Environmental Considerations

- These cars are never driven on local roads.
- Owners do not reside in the island; the cars are too rare, vulnerable to damage and valuable to operate locally on our smaller roads.
- Movement between storage and ferry/servicing is typically via covered trailer, not under their own power.
- [TEXT REDACTED], have advised that the structure *can also operate in Jersey* for non-resident owned ISE companies, provided there is:
  - No enjoyment of the vehicles in Jersey
  - No use unless travelling directly for service or export
  - No display in museums or public venues
- This aligns well with Jersey's net-zero goals, as the cars do not contribute to on-island emissions.
- The typical "sweet spot" for stored vehicles is modern low-volume, high-value cars produced from 2000 onwards.

#### Request for Clarification Before Significant Investment.

We currently have [TEXT REDACTED] parties interested in investing in a very high quality purpose-built Jersey storage facility with full fire suppression, security, temperature, and humidity control. This represents a £[TEXT REDACTED] m investment, and we are ready to begin sourcing premises.

However, before proceeding, we require assurances that—under strict conditions—the island will allow the importation and presence of these vehicles after 2030. Additionally, IQ-EQ / CSPs see this as a good source of annuity income for the island, and we are prepared to invest in this service offering.

I know that you are obtaining views via the consultation survey, but wanted to address this separately as we are keen to progress this business stream and investment into Jersey now, as I am receiving constant enquiries to set up structures in Jersey at the moment and I am keen for Jersey to be the beneficiary of this, whilst not adding to the islands CO2 output.

I have cc'd [TEXT REDACTED], whom I have spoken to on the subject and is happy to raise this with Gov.je's financial competitiveness team vs other jurisdictions.

Please do let me know if I can help with any clarification.

Kind regards,  
[TEXT REDACTED]