

05.01.2023

Hi Michelle, thanks for your email.

We have a clear understanding of the consultation and it's proposals. The issue of obtaining IVA's for all WAV vehicles is that this is extremely time consuming, expensive and not always possible or achievable for a vehicle if it has no conversion specification documentation from its original conversion etc..

We simply will not be able to obtain to IVA's on all of our current fleet, and those we can would take us many months – on average it can take around 10 to 12 weeks for one vehicle, and it is not practical to do more than 1 or 2 concurrently.

Therefore the current consultation of a timescale of end of April 2023 is completely unrealistic and not achievable – particularly if this consultation is only adopted in February – is TBC really suggesting that 8 weeks to adopt a significant and major policy change is appropriate?.

I just can not understand why TBC are forcing this through with such an unrealistic and unachievable timescale. Surely the industry should be given at least 12 months, from the date of policy adoption, to achieve the new proposed position?

Please could you also advise on the date of the committee meeting, and if these can be attended by the public, as I would very much like to make a personal representation.

Best regards

Richard