

# Response ID ANON-RS77-RKG7-E

Submitted to 2025 Fee Consultation

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## Introduction

1 What is your name?

Name:

Henry Smith

2 What is your email address?

Email:

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3 What is your organisation?

Organisation:

Guernsey Association of Trustees

## Overall Increase in Fees

4 Do you have any comments on the overall proposed fee increase?

This is where the question goes:

This response focuses on the impact of the increase on the fiduciary sector - no comment is made on the impact on the other sectors which will be affected by these increases.

Whilst the Guernsey Association of Trustees acknowledges the impact of inflation on the GFSC and therefore the use of RPI to determine the quantum of these increase to fees, trading conditions remain tough for fiduciary licensees in Guernsey and therefore we would ask that you consider reducing the 5.3% increase.

The fiduciary industry has seen costs increasing in all areas in the last few years and has accordingly been forced to significantly put up fees during this period. These substantial increases have caused challenges with clients and, in some cases, the loss of business for Guernsey - TCSPs will therefore be desperate to not pass on these new increases to regulatory costs to clients and therefore, in many cases, will be obliged to absorb these costs themselves. This will only hurt TCSPs at this difficult time.

Allied to this, the fiduciary industry remains flat in that it has not grown in size across the last year and, indeed, there indications that it may in fact shrink in size - the fiduciary industry represents a substantial portion of the Guernsey financial services sector in terms of both revenue and employment. The fiduciary industry needs to be as competitive as possible to win new business and head off any risk of decline - an increase in regulatory fees of this size only hinders these attempts.

More widely, the travel disruption caused by recent issues with Aurigny, high interest rates and other more "macro" pressures continue to make business for all TCSPs that much tougher - noting again the importance of our fiduciary industry to Guernsey, it is important that the GFSC (and government more widely) does everything it can to support it. Therefore, we would ask that the proposed increase is revisited in this context and that a reduction is strongly considered.

When considering what might reduction would be appropriate, we would argue that, at the very least, a use of the RPIX figure to calculate an increase would be more appropriate - this would be 4.5%.

## Increase in fees for Retail General Insurers ('RGI')

5 Do you have any comments on the increase in fees for RGIs?

Do you have any comments on the increase in fees for RGIs?:

None

## Applying to operate an investment exchange in the Bailiwick of Guernsey

6 Do you have any comments on the proposed application fee to operate an investment exchange in the Bailiwick?

Do you have any comments on the proposed application fee to operate an investment exchange in the Bailiwick?:

None

## Rationalisation of the fee regulations

7 Do you have any comments on the proposed rationalisation of the fee regulations?

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None