



ACS (the Association Convenience Stores) Submission:

Red Tape Challenge: Retail and Manufacturing Consultation

1. ACS (the Association of Convenience Stores) welcomes the opportunity to respond to the Government's consultation on the retail regulations of the Red Tape Challenge. ACS represents 33,500 locals across the country including the Co-op, Spar, Costcutter and thousands of independent retailers. (see Annex 1)
2. ACS has engaged with the Red Tape Challenge from the outset and welcomes the Government's commitment to reduce regulations for businesses. ACS urges the Government to continually review the burden of regulations on businesses and take action wherever possible. The Red Tape Challenge should be an ongoing process and shapes in the Government's approach to policy development and co-ordinate across Government departments in order to limit the impact of new regulations on business.
3. Our response focuses on the Pyrotechnic Articles regulations and the broader regulations that affect the convenience sector.

Pyrotechnic Articles (Safety) Regulations 2010 (SI 2010/1554)

4. ACS welcomes that the Government will remove the Pyrotechnic Articles (Safety) Regulations 2010 (SI 2010/1554). This regulation is a prime example of poorly thought out policy that is unnecessarily burdensome on business. Removing the 16 year old age restriction for the sale of Christmas Crackers is a proportionate move. This product poses minimal danger to persons of this age.

Retail Regulation

5. Despite the Government's commitment to reduce regulations our members continue to suffer from significant regulatory burdens, with more expected in the near future. Set out below are some of the additional burdens that the convenience sector is facing:

Tobacco

- Ban on sales of tobacco from vending machines
- Tobacco Display Ban for large stores in England

- *Scotland, Wales and Northern Ireland implementation dates still to be confirmed*
- Currently consulting on standardised tobacco packaging

Alcohol

- Reform to licensing application process
- New powers for councils to set their own licence fees
- New powers for Councils to remove alcohol licences granted for sale between the hours of 12am and 6am
- New powers to charge additional licence fees for stores licensed to sell alcohol between 12am and 6am.
- Announcement of multi buy promotion consultation and significant changes to licensing procedure.

Environment

- Compulsory Carrier Bag Charges in Wales
6. These regulations represent a significant burden on retailers that are not outweighed by the removal of regulations in the first wave of the Red Tape Challenge. We hope that the Government will look to apply their "one in, one out" policy meaningfully when new regulations are introduced.
 7. ACS is keen to work with the Department of Business Innovation and Skills, and other Government departments to consult on new regulations and support them to limit the impact on businesses.

ANNEX 1- THE ASSOCIATION OF CONVENIENCE STORES

ACS is the trade body representing the interests of over 33,500 convenience stores operating in city centres as well as rural and suburban areas. Members include familiar names such as Martin McColl, Spar and Costcutter, as well as independent stores operating under their own fascia. Our members operate small grocers, off-licence or petrol forecourt shops with between 500 and 3,000 square feet of selling space.