

**Red Tape Challenge**  
**Retail and Manufacturing Consultation**

**May 2012**

**A note from the British Retail Consortium (BRC)**

The British Retail Consortium (BRC) represents the whole range of retailers, from the large multiples and department stores through to independents, selling a wide selection of products through centre of town, out of town, rural and on-line stores. Our policies and positions are approved by Committees representative of the whole membership.

The BRC supports the proposals to repeal the Regulations outlined in the Consultation. Retailers take their responsibilities - within their capacity and obligations as distributors, importers and manufacturers as the case may be - to ensure that only safe products are placed on the market very seriously. The General Product Safety Directive as transposed into UK law is designed to ensure that only safe products are placed on the market – and where a product is subsequently proven to be unsafe sets out the procedures for its withdrawal or recall from the consumer market. In principle the BRC believes that retailers should be free to implement due diligence procedures without being subject to direction in relation to specific products. Cost savings result from retailers being able to utilise their own approaches to guaranteeing only safe products reach the market rather than trying to fit into a straitjacket imposed by regulation – often a different approach for each product. For smaller retailers, the extension of the Primary Authority scheme to trade associations – and the associated option of preparing assured guidance – would provide one way of assisting such retailers if they have any doubts as to how to apply the GPSRs to these products.

We also support the reduction in the age for the sale of Christmas crackers to 12. Our customers cannot understand why the sale of these products should be age restricted and any reduction in the age limit is welcome. We would support the Government in any attempt to renegotiate the age limit in the EU legislation.



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