



**National
Measurement
Office**

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Innovation & Skills

**GOVERNMENT RESPONSE TO THE
CONSULTATION ON SPECIFIED
QUANTITIES - NON PRE-PACKAGES
AND FOOD INFORMATION**

SEPTEMBER 2009

GOVERNMENT RESPONSE TO THE CONSULTATION ON SPECIFIED QUANTITIES – NON PRE-PACKAGES AND FOOD INFORMATION

Introduction

1. This document analyses responses to the public consultation on the Government's proposals to implement the EU Directive on Nominal Quantities for Pre-packages and to update the legal framework for prescribed quantities for non pre-packaged bread and alcohol. The consultation opened on 23 October 2008 and closed on 1 January 2009. The first part of the Government's response to that consultation, dealing with specified quantities for pre-packages, was published on 23 January. This document sets out the Government's position with regard to proposals to amend prescribed quantities for non-pre-packaged intoxicating liquor and unwrapped bread and the quantity labelling aspects of the Food Information Regulation.
2. The UK has a small number of prescribed quantities in place for non pre-packaged goods. The consultation sought views on the future of the restrictions that apply to intoxicating liquor (beer, cider, wines, gin, rum, vodka and whisky) and non pre-packed bread in light of the deregulation for pre-packages and sought views on some specific proposals for change.
3. The consultation document also invited views on the quantity labelling and information aspects of the European Commission's proposal for a Regulation on the provision of food information to consumers, which will consolidate and update Directive 2000/13/EC and which is still subject to negotiation by the European Parliament and Member States.

Indication of who responded

4. The consultation document was sent directly to around 150 stakeholders and was available through the National Measurement Office (then the National Weights and Measures Laboratory) website. A press notice highlighting the consultation and particularly a proposal to permit 2/3 pint measures for beer, secured national press, and radio and television coverage for the consultation. NMO officials also met with a number of stakeholders separately both before and during the consultation period.
5. A total of 127 responses were received. NMO is grateful to all those who gave thought to the issues raised in the consultation and took the time to respond. All responses have been analysed and considered. We have taken account of respondents' views and, where appropriate, have amended our proposals (see paragraph 12 below).
6. The table below shows the breakdown of responses by type of organisation.

Type of Organisation	Responses received
Business	32
Consumer Group	4
Individual Consumer	47
Trade Association	15
Trading Standards	21
Others	8

7. The eight organisations listed as “other” include public health bodies, universities and NGOs. A list of those organisation or individuals who responded, who did not request confidentiality, can be found at Annex A.

Executive Summary

8. New legislation, the ‘Weights and Measures (Specified Quantities)(Pre-Packaged Products) Regulations 2009’ came into force on 11 April 2009.
9. Those Regulations included only those aspects of the proposals made in the consultation that were necessary to implement Directive 2007/45/EC. That is, those that related to pre-packaged products. Those Regulations deregulated existing specified quantities for all pre-packaged products except for wines and spirits. Further details of the changes to UK law resulting from these Regulations can be found in the Part 1 of the Government Response and the Guidance for Business at www.nmo.gov.uk.
10. We also intend to put forward a separate Statutory Instrument to make changes to prescribed quantities for intoxicating liquor and unwrapped bread, to come into force at the earliest opportunity after publication of the draft regulations later this year.
11. The Government will bring forward legislation to:
- Deregulate glasses of wines below 75 ml from the requirement to use specified quantities (see Question 4).
 - Increase flexibility in the service of smaller glasses of draught beer and cider with the introduction of a new specified quantity of 2/3 pint (see Question 3).
12. In addition, the Government has amended its proposals on non pre-packaged specified quantities in light of the responses to the consultation as follows and will bring forward legislation to:
- Require the sale of brandy in specified quantities of 25 ml and 35 ml (see Question 6).

- Deregulate specified quantities for unwrapped bread but ensure that the consumer is provided with information on quantity for non standard loaves (see Question 5).
 - Replace the existing specified quantities for fortified wines with smaller sizes of 50 ml and 70 ml to bring the law into line with current trade practice (see Question 7).
13. The Government is also consulting on a new mandatory code for the alcohol industry which is being developed under proposals in the Policing and Crime Bill currently before Parliament, which introduces new provisions into the Licensing Act 2003. The draft code includes a requirement that where certain alcoholic drinks are sold for consumption on licensed premises, they must always be available and offered for sale in the smallest specified quantities, as set out below -
- beer, lager or cider - ½ pint
 - gin, rum, vodka, whisky (and brandy) – 25 ml or 35 ml
 - still wine by the glass - 125ml
- (see Question 8).

Analysis and Government Response

Question 1

Do you agree that the UK should deregulate specified quantities for butter, milk, dried pasta, coffee and white sugar on 11th April 2009 rather than make use of the extended transitional periods which would allow for retention until 11th October 2012 (11th October 2013 for white sugar)?

14. The analysis of the responses and the Government response to this question was published in Part 1 of the Government's response on 23rd January and can be found here:
[Government Response Part 1](#)

Question 2

Do you support the retention of prescribed quantities for the sale of non-pre-packaged alcoholic drinks (spirits, wine, beer and cider) sold where they are to be consumed?

15. The vast majority of those who responded to this question supported the retention of prescribed quantities for non pre-packaged alcoholic drinks.
16. Most supported retention based on fair trade, consumer protection and health and road safety arguments. In particular, respondents commented that prescribed quantities allow consumers to manage their alcohol intake and that it was important for consumers to know how much they were drinking for both health and road safety purposes.

17. For example the Trading Standards Institute commented that “Where non-prepacked goods are concerned, prescribed quantities have a greater role to play in ensuring fair competition between trader and trader; this also allows for a balanced equity between trader and customer; it allows for clear price comparison by a prospective customer between traders.” CAMRA commented that “the existence of prescribed measures allows consumers to easily compare prices between competing pubs. Abolition of prescribed quantities would prevent consumers from accurately assessing which pubs offer the best value for money thereby undermining price competition.” Alcohol Concern supported the retention of prescribed quantities and believed that “deregulation will confuse rather than aid the promotion of health messages around alcohol which are based on alcohol units in beverages”. The Scottish Licensed Trade Association also pointed out that the existing prescribed quantities are well known by consumers and bar staff and that their removal could cause confusion and increased costs for business.
18. A small number of businesses and individual consumers did not support the retention of prescribed quantities for non pre-packaged alcoholic drinks and favoured deregulation. Some felt that prescribed quantities were unnecessary provided that the volume of the serving was stated accurately.
19. A number of respondents felt that prescribed quantities should be replaced by unit pricing with the quantity, unit price and number of alcoholic units clearly shown.
20. A small minority of respondents felt that the prescribed quantities for glasses of wine and beer were not helpful because they did not allow for easy price comparisons with bottled products which are packaged in different quantities. For example Mr Arthur Coppock observed that, “It makes little sense to prescribe quantities for non-pre-packaged drinks and yet allow a free range of packaged sizes. I am permitted to drink a glass filled from a 500ml bottle of Stella Artois in my local pub but forbidden to have the same glass filled with 500ml from a draught pump.”
21. A small number of respondents also favoured a move to metric measures for beer and cider, which would aid price comparisons with pre-packaged alcoholic drinks sold in metric units.

Government Response

22. *The Government’s view is that there remains a strong case for the retention of prescribed quantities for non pre-packaged alcoholic drinks served in licensed premises. We agree with those respondents that argued for retention based on consumer and health protection grounds.*
23. *Whilst there is an argument for unit pricing to be extended to non pre-packaged alcoholic drinks, the Government’s view is that this is likely to increase costs for business, and may cause confusion for consumers who are familiar with the existing measures.*

24. *The Government has no plans to extend metric measures to the sale of draught beer or cider.*

25. ***The Government believes that there are strong grounds for treating alcoholic drinks differently than other products and for that reason proposes to retain the regime of prescribed quantities for non pre-packaged alcoholic drinks with the amendments set out below.***

Question 3

Do you support increasing the available prescribed quantities for non pre-packaged beer and cider (currently 1/3, 1/2, and multiples of 1/2 pint) to allow 2/3 pint to be served?

26. Responses to this question were split with strong support from the main trade association, the British Beer and Pub Association, but with respondents from business, trading standards and consumers all divided.

27. The BPPA supported the proposal which they believe will extend consumer choice and will respond to consumer demand for more attractive and stylish presentation of beer. In particular it would make beer a more attractive option to be served as part of a meal.

28. Alcohol Concern also expressed support for the proposal as it would offer a greater choice of smaller measures and could reduce consumption as drinkers opt for 2/3 pint rather than a pint.

29. A number of Trading Standards Departments, including Wessex and Somerset also supported the measure which they believe would offer consumers more choice, provided that consumers continue to receive adequate information on quantity to allow them to make value judgments and keep track of their intake.

30. Some individual businesses also expressed support, including the Ignite Group, who favoured making 2/3 pint available, subject to consumers receiving information on quantity.

31. However, a number of respondents thought that the 2/3 pint size was unnecessary whilst others thought that it would create confusion for consumers and the licensed trade. Some expressed concern that the 2/3 size was not sufficiently different from the 1/2 pint or 1 pint sizes and that it would be difficult for consumers to distinguish between them.

32. For example, the Campaign for Real Ale (CAMRA) expressed concern that some pubs may choose to replace the 1/2 pint measure with a 2/3 pint measure, and commented that the introduction of 2/3 pint could cause confusion for consumers and those working in licensed premises.

Government Response

33. *There is no clear consensus on whether to permit the use of 2/3 pint for the sale of draught beer and cider. The Government has weighed the arguments made by both sides and has given weight to the arguments put forward by the main trade association, the BBPA in support of the new size. In particular the Government is convinced by the arguments that the introduction of 2/3 pint would allow greater freedom for licensed premises to offer a greater range of sizes and more choice for consumers. There will be no requirement for any licensed premises to adopt the use of 2/3 pint and so the proposal will not impose any new burdens on business. Only those businesses that support the introduction of 2/3 pint and want to take advantage of the new size would be likely to introduce it. Therefore, the Government has decided to bring forward legislation to introduce this new size at the next opportunity following publication of the Regulations later this year.*

Question 4

Do you support the exclusion of wine served in a quantity below 75 ml from the requirement to use prescribed quantities?

34. There was significant interest in this proposal from both business and individual consumers. The overwhelming majority of respondents were in favour of excluding wine served in a quantity below 75 ml from the requirement to use specified quantities. Support for the proposal was received from individual consumers, businesses and trading standards departments.
35. The main argument expressed to support the deregulation of small servings of wine is that there is consumer demand for small servings in the form of wine tastings, samples and wine flights that cannot currently be met due to the restrictions requiring the use of a minimum serving of 125 ml for wine sold by the glass. Therefore, the removal of this restriction for servings below 75ml would encourage innovation and allow consumers the choice to sample wines in small quantities, encouraging sensible drinking. For example Selfridges said, "We believe this deregulation will stimulate demand for fine wine and encourage the public to drink a better quality product in smaller amounts."
36. The Wine and Spirit Trade Association also supports the proposal and notes that "there is consumer demand for these smaller measures and this would allow the industry (retail and on trade) to offer small tasting measures of wine either as single quantities or as part of a flight of wines".
37. A large number of individual consumers took the time to comment in support of this proposal. For example Laurie Othen makes the point that "we need to encourage innovation and to encourage people to sample and enjoy a high quality drink as opposed to encouraging volume drinking, and this would aid that".

38. A number of Trading Standards Departments supported the proposal but with caveats that information on quantity should be provided to ensure that consumers could still make price and value comparisons and to ensure fair measure.
39. A very small number of respondents were against the proposal, notably Scottish Consultants In Public Health Medicine and Scottish Alcohol Concern who believed that the proposal could make it more difficult for consumers to keep track of their alcohol intake. Several of those who were against the proposal, were in favour of a new prescribed quantity of 50 ml which would allow for small glasses for samples and wine flights, but which would enable price comparisons and allow for easier monitoring of alcohol intake.

Government Response

40. *The Government is convinced by the arguments made and the strength of support for this proposal that there is demand for smaller servings of wine and that the existing regime is unnecessarily restrictive. The Government agrees that deregulating very small glasses of wine will encourage innovation and sensible drinking. **Therefore, the Government proposes to exempt wines served in a quantity below 75 ml from the requirements of specified quantities.***

Question 5

Do you support the proposal to deregulate specified quantities for unwrapped bread?

41. A majority of respondents were in favour of deregulating prescribed quantities for unwrapped bread. Many agreed that it would be sensible to treat unwrapped bread in the same way as packaged bread. However, a significant proportion of those supporting the proposal did so subject to a requirement to indicate quantity.
42. The proposal was supported by most of the interested trade associations or businesses including the British Retail Consortium, the Federation of Bakers, the Food and Drink Federation, and Warburtons. The latter three organisations all questioned whether the exemption for loaves below 300 g would continue to apply.
43. The reaction from Trading Standards departments was mixed with a small majority in support, providing that consumers were informed of quantity and could still make price and quantity comparisons. The Trading Standards Institute observed that bread is a variably aerated product and can vary significantly in density by type and commented that “If the prescribed quantities were removed for unwrapped bread the only way the customer could be equally protected and informed would be by the provision of weight information”.

44. However, the National Association of Master Bakers, who represent a large number of small “craft” bakeries did not support the proposal. The NAMB commented that “the legal requirement that bread can only be sold in 400 g or multiples of 400 g quantities is seen as a protection from having to label individual loaves”, and that a new labelling requirement would lead to increased costs for business in the form of labelling equipment and staff time.

Government Response

45. *The Government does not believe that there is a strong case for the retention of prescribed quantities for unwrapped bread. Prescribed quantities restrict the market and their removal will promote innovation. There is already a growing market for speciality and artisan breads and this will be further encouraged by the option to make up loaves in any size.*
46. *At the same time the consumer should have sufficient information on quantity to be able to make informed purchasing decisions to ensure that the market operates effectively. We are convinced by the arguments made by TSI and others that the nature of the product makes it difficult for consumers to judge quantity by sight alone and that some form of information on quantity should be provided for consumers where loaves are sold in non standard sizes (i.e. where they are not made up in 400 g or 800 g) .*
47. *However, the provision of this information would not have to be in the form of universal labelling for each loaf but could be provided in the form of a single written notice, a label or a sign.*
48. ***The Government’s policy is to repeal the prescribed quantities for unwrapped bread and to require that information on the quantity of unwrapped loaves be provided to consumers, where loaves are made up in non standard sizes. There would be no new costs for business unless they chose to adopt new sizes.***

Question 6

Do you have any views on whether the requirement for the use of specified quantities be extended to spirits other than gin, rum, vodka, and whisky where they are sold for consumption on the premises where they are to be consumed?

49. A significant majority of respondents supported the extension of specified quantities to spirits other than the four that are currently regulated (gin, rum, vodka and whisky). Support for the proposal came predominantly from Trading Standards, the health lobby and consumers who wanted consistency and clarity about serving sizes.
50. LACORS’ view was echoed by many respondents when they stated that “the use of prescribed quantities for other spirits would assist consumers in

monitoring the number of units of alcohol consumed and aid responsible drinking”. A number of consumers reported that they felt the existing situation was confusing with the quantities of many newer drinks, such as flavoured spirits, being unregulated.

51. Of those that supported an extension, brandy was often mentioned as a product to which specified quantities should be applied. Others felt that all alcoholic drinks above a certain strength should be required to be sold only in prescribed quantities. For example Alcohol Focus Scotland suggested that, “Since there are many different types of alcohol drinks, with new mixes also being created, it may be difficult to proscribe measures by type...[therefore] the prescribed measure should relate to the alcoholic strength of a drink. For example we suggested drinks over 25% should be treated as a spirit and sold in 25 ml measures, and drinks of between 14% and 24% should be treated as the same strength as a fortified wine and be sold in a standard prescribed measure for example 50 ml.”
52. A minority of respondents, predominantly business, did not support the extension of specified quantities to a wider range of spirits. Both the British Beer and Pub Association and the Wine and Spirits Trade Association (WSTA) expressed concerns over the increased costs to business that they believed would be incurred as a result of any extension of specified quantities. The WSTA was concerned that an extension “would incur considerable cost to the industry. There would be a requirement for additional government stamped measures for all spirits, which would not only incur an increased cost for the industry, but also require an increased enforcement resource.” The BBPA felt an extension was unnecessary as “there have been no reported problems or difficulties associated with the serving of other spirits.” They were also keen to maintain the existing exemption for cocktails.
53. However, as several Trading Standards departments observed, a majority of licensed premises already use the same quantities and glassware for non-prescribed as prescribed spirits and therefore there should be no additional costs for the majority of businesses.

Government Response

54. *Despite the significant level of support from the enforcement community, health bodies and consumers, the Government is not convinced that there is a strong case for requiring all spirit drinks to be sold in prescribed quantities. As many Trading Standards Departments observed, the vast majority of spirits, whether they are regulated or not, are already served in the standard prescribed sizes of 25 ml or 35 ml and in standard glassware.*
55. *With regard to the proposal to regulate the quantities of spirits by alcoholic strength, while we agree that there is some merit for consumers, it is likely to be confusing for bar staff and may ultimately lead to errors and consumer detriment.*

56. *However, we do believe that sale of brandy poses particular difficulties, as it is often unclear what quantity is being sold and the glassware used for brandy is often peculiar to that drink.*
57. ***Therefore, although we are not convinced that there is a need to regulate all spirits we do agree that prescribed quantities should be extended to brandy and that brandy should be required to be sold in 25 ml or 35 ml quantities. However, provision for prescribed quantities will only apply to brandy sold after the expiry of the period of 12 months from the coming into force of the new legislation to allow for a transitional period during which time business will be able to adapt to the new practice.***

Question 7

Should fortified wines continue to be subject to specified quantities?

58. There was a mixed response to this question. However, a majority of respondents felt that specified quantities should apply to fortified wines in some form and that the existing sizes (125 ml or 175 ml or a multiple) were too large.
59. A large proportion of respondents expressed concern over the health implications of a requirement to serve fortified wines in the same quantities as table wines and some observed that there is little consumer demand for such large measures.
60. However, there was no consensus on how to resolve the issue. A number of respondents favoured new specified quantities of 50ml and 70ml that would apply specifically to fortified wines, (or to wines of a specific alcoholic strength).
61. Others felt that the existing specified quantities could be retained, providing that an exemption for small servings below 75 ml was introduced. This would apply to all wines, including fortified wines, which could then be sold in 50 ml and 70 ml sizes.
62. A small number of respondents, including the BBPA, favoured removing fortified wine from the requirement to be sold in specified quantities altogether.

Government Response

63. ***The Government agrees that fortified wines should not be required to be sold in such large quantities. We are persuaded by the consumer and health protection arguments that more appropriate prescribed quantities of 50ml or 70ml should apply to fortified wines.***

Question 8

Do you have any views on whether the quantities of wine permitted to be sold by the glass are sufficient to protect the public health interest?

64. A majority of those respondents who addressed this question believed that the existing specified quantities were not sufficient to protect public health and that more should be done. In particular there was a belief among many respondents, including many consumers, that the use of the 250 ml size had grown at the cost of the 125 ml size and that consumers were not now offered sufficient choice of smaller 125 ml servings. As a result there was support for a requirement for pubs to offer the 125 ml glass size to ensure that consumers had choice and were not encouraged to drink larger servings.
65. Some respondents went further and argued for the 250 ml size to be removed altogether to encourage consumers to drink more sensibly.
66. On the other hand some respondents, including the BBPA, believed that the existing specified quantities were sufficient and that there was no need to amend them. The BBPA also stated their objections to reference made in the consultation to the report carried out by KPMG and the conclusions that it drew, questioning its assertion that the pub industry had promoted larger wine glass sizes and that there was an association with drunkenness. The BBPA felt strongly that any decrease in the use of the 125 ml size was due to the industry responding to consumer demand.

Government Response

67. *The Government is grateful to those who expressed a view on this issue. During our consultation, the Policing and Crime Bill was introduced into the House of Commons (on 18 December 2008). The Bill includes proposals for a mandatory code for the alcohol industry and inserts new provisions into the Licensing Act 2003. The Bill provides for up to nine mandatory national conditions on licensed premises and for local conditions which licensing authorities may, in certain circumstances, impose on more than one premises in an area. The conditions will be supported by statutory guidance which licensing authorities must have regard to when carrying out their functions under the Licensing Act.*
68. *A draft of the proposed code was published for consultation on 12 May 2009.*
69. *We are agreed that the code provides a more appropriate tool for ensuring consumers have access to small measures rather than weights and measures legislation. NMO has, therefore, passed all the non-confidential responses on this question to the Department of Health and we will work with other Government Departments to ensure that the new code and weights and measures legislation work together to help protect public health.*

70. *The draft code includes a mandatory national condition to require that where certain alcoholic drinks are sold for consumption on licensed premises, they must always be available and offered for sale in the smallest standard specified quantities, as set out below -*
- *beer, lager or cider - ½ pint*
 - *gin, rum, vodka, whisky (and brandy) – 25 ml or 35 ml*
 - *still wine by the glass – 125 ml*
71. *As mentioned above, Government intends to legislate to treat brandy in the same way as other spirits and it would then be subject to any requirement for it to be available in single measures.*
72. *The consultation on the draft code also sought views on whether to introduce one single standard measure for gin, rum, vodka and whisky (and brandy). The 3 options for consideration are:*
- *25ml only*
 - *35ml only*
 - *whether it should remain the choice of the individual licence holder to supply either 25ml or 35ml*
73. *The consultation on the code for alcohol retailers closed on 14th August, and the responses are being analysed.*

Question 9

Do you have any views on the quantity labelling or information aspects of the Commission's proposal for a Regulation on the provision of food information to consumers to replace Directive 2000/13/EC?

74. There was a wide range of detailed comments received in response to this question. There was strong support for the consolidation and simplification of the existing provisions in principle and for the general approach taken in the draft Food Information Regulation.
75. However, a number of themes emerged from the responses. There was concern over the wording of the rule requiring liquids to be labelled by volume and other foods by weight and in particular how a liquid would be defined and how specific types of foods would be treated (such as gels, soups, ice cream). It was felt by many respondents that greater clarity was needed over the application of this rule.
76. The issue of the removal of existing national rules, for example exemptions from quantity labelling for certain small packages or specific products, was also a concern for several trade associations and businesses, particularly where new costs were likely to be incurred as a result. There was support for maintaining the existing national exemptions.

77. A number of Trading Standards departments also highlighted the need for an objective method of testing drained net weight.
78. The lack of provision for the sale of foods by number or “countable produce” was a concern to many respondents who noted that a requirement to sell such products by weight would impose additional costs and would not be helpful to consumers.

Government Response

79. *The responses received are extremely helpful and largely support the Government’s current approach to the negotiations on the new Food Information Regulation. All comments will be taking into account in developing our negotiation position.*
80. ***We will be seeking specific amendments to the draft Regulation in response to some of the concerns raised, notably to allow foods to be sold by number, to ensure the inclusion of an appropriate test method for drained net weight and to ensure that the weight/volume rule is clearer and recognises the use of standard trade practice for certain products. However, we do not propose to seek to maintain existing national exemptions for specific products such as small bars of chocolate or snack foods. We believe that there are advantages in having a European wide framework for quantity labelling of foods and by removing any such exemptions across all Member States, consumer protection will be increased. Negotiations are on-going and the resulting Regulation is unlikely to become law until 2011 at the earliest.***

Question 10

Do you have any other comments on the proposals or any suggestions for further reform in this area?

81. A range of responses was received.
82. One of the key themes to emerge was that many respondents identified the greater importance of unit pricing for consumer protection, following the deregulation of specified quantities for pre-packaged goods. There was a desire among the enforcement community, in particular, for unit pricing to be promoted more widely to consumers and for the exemption from unit pricing for small shops to be reconsidered in light of the changes to specified quantities.
83. A number of respondents suggested that the law relating to quantity labelling of non food should also be reviewed and brought up to date.
84. A small number of respondents suggested that brim measure glasses for the sale of draught beer should be banned and a pint of beer should be required by law to be 100% liquid.

85. Individual respondents proposed a number of other specific measures, including the removing certain specific exemptions from quantity labelling, the use of metric quantities for beer, retention of prescribed quantities for open sacks of coal, and action to deal with selling loose foods by the bowl.

Government Response

86. *The Government is grateful for the responses received and will consider each proposal carefully. Where appropriate, the Government will respond directly to individual proposals.*
87. *Unit pricing is the responsibility of the Consumer and Competition Policy Directorate of the Department for Business, Innovation and Skills and your comments and suggestions on that issue have been passed to them for consideration.*
88. *NMO intends to review the operation of Part IV of the Weights and Measures Act, including its application to non foods, over the next 18 months and will keep interested parties informed of progress in that area.*

Question 11

Can you identify any types of costs or benefits for your business or more generally resulting from these proposals and quantify those costs or benefits?

89. Very few respondents commented in response to this question. Of those that did, most believed the costs to be neutral or negligible, while the benefits would come from improvements to consumer protection and public health.
90. For example, Scottish Consultants In Public Health Medicine noted that the “costs to society of alcohol related problems across the UK have been estimated by the Cabinet Office to be more than £25 billion a year, and any costs to the drinks industry must be set in this context. Effective measures for reducing alcohol related harm include controlling price and availability. Using prescribed measures can contribute to this by controlling the amount of alcohol that is served to people as a single ‘drink’. Prescribed measures also contribute to raising awareness amongst the population of the amount of alcohol they are consuming, allowing them to choose to drink responsibly. This will contribute to the cultural change that needs to take place in terms of our approach to alcohol consumption across the UK.”
91. Only one business identified specific cost benefits that would arise from the proposals. They identified savings of approx £3000 per licensed premises resulting from the proposal to deregulate wine below 75 ml plus the expectation that their business would grow and expand as a result, creating up to 20 new jobs over the next 2 years.

Next Steps

92. The Government introduced new legislation on 11 April 2009 to implement Directive 2007/45/EC which is concerned with pre-packages.
93. The proposals relating to non re-packaged alcohol and unwrapped bread will be implemented by secondary legislation, to come into force at the earliest opportunity following publication of the new legislation later this year.
94. NMO will continue to work with the Food Standards Agency in taking forward the negotiations on the Food Information Regulation and will take into account the comments received as part of this consultation exercise.

Annex A

List of respondents to the Consultation in alphabetical order

Accenture	John Gibson
Alan Jones	John Murray
Alcohol Concern	Jon Roach
Alcohol Focus Scotland	Jonathan Points
Andrew Cormie	Juel Mahoney
Andrew Tucker	Justices' Clerks' Society
Angus Scott	Kevin Scranage
Anthony Tittley	LACORS
Argyll & Bute Council Trading Standards Service	Lapostolle
Around Wine	Laurie Othen
Arthur Coppock	Majestic Wine Warehouses
Association of Wine Educators (AWE)	Martin Vlietstra
Avery Wine Merchants	Metrology Liasion Panel of SWERCOTS
Bedfordshire County Council	Michael Garrison
Bee Farmers' Association Of The U.K.	Moet Hennessy UK Ltd
Bermar (International) Ltd	Mr & Mrs Hoskins
Bibendum Wine Limited	Natasha Hughes
British Beer & Pub Association	National Association of Master Bakers
British Retail Consortium	Nestle UK
Campaign For Real Ale	Nick Groundwater
Central England Trading Standards Authorities	Nick Kernoghan
Chris Coombes	Nick Kimberley
Chris Wright	Nicola Stead
City & County of Swansea	Norfolk Trading Standards
Conference and Travel Publications	Northumberland County Council
Dairy UK	Osprey Point
David Smart	Paragraph Publishing
Dept of Enterprise, Trade & Investment	Peter Bradbury
Dermot Sugrue	Peter Brown
Desmond Kilcoyne	Petrol Retailers Association
Diageo	Phil McKerracher
Don Jordan	Philip Edey
East Midlands Co-ordinators of Regulatory Services	Premier Foods plc
Enotria	Raymond Reynolds Ltd
Federation of Bakers	Reg Ward
Fiona Beckett	Richard Hall
Food and Drink Federation	Rob Dougan
George James Ltd	Rupert Byng
Gerald Bull	Rural Payment Agency
Graham Middleton	S1 Metric-Matters
Hampshire County Council	Scottish Consultants In Public Health Medicine
Haynes Hanson & Clark	Selfridges & Co

Howard Bilton	Skye Kennedy
Ian Dufour	Somerset Trading Standards Service
Ian Jarratt	Sophie Roberts-Brown
Ignite Group Ltd	South East London Metrology Group
Institute of Consumer Affairs	South West London Metrology Group
Jancis Robinson	Steve Hosgood
Terry Simpson	TSI Head Office
The British Beekeepers' Association	TSNW Metrology Focus Group
The Clockwork Beer Company	UK Metric Association
The Co-operative Food	UK Travel Retail Forum
The Fat Duck	University of Huddersfield
The Innis & Gunn Brewing Company Ltd	Vine Trail Ltd
The Parkinson's Disease Society	Warburtons Ltd
The Sampler (UK) Ltd	West Sussex County Council
The Scottish Licensed Trade Association	Wine and Spirit Trade Association
The Ultimate Wine Company	Woodwinters Wines and Whiskies
Thomas DeWaen	Working Men's Club & Institute Union Limited
Tom Croxford	



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