



UK metric association

Campaigning for a **single** *rational* system of measurement

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Ms Lynnette Falk
National Weights and Measures Laboratory
Department for Innovation, Universities and Skills
Stanton Avenue
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Dear Ms Falk

Consultation on weights and measures legislation dealing with specified quantities and quantity labelling of foods

I am writing on behalf of the UK Metric Association (UKMA) to give our comments on the consultation paper dated 23 October 2008.

UKMA is an independent, non-party political, single issue organisation which advocates the full adoption of the international metric system ("Système International" - SI) for all official, trade, legal, contractual and other purposes in the United Kingdom as soon as practicable. We also campaign for better consumer protection through accurate and consistent use of metric units of measurement in order to achieve price transparency. UKMA is financed entirely by membership subscriptions and personal donations.

The comments below were approved by the Committee of UKMA on 5 November.

We have tried to address the questions posed in the consultation paper as follows.

3.1 Do you agree that the UK should deregulate specified quantities for the following products on 11th April 2009 rather than make use of the extended transitional periods and retain them until 11th October 2012 (11th October 2013 for white sugar)?

- a. Dried Pasta*
- b. Coffee*
- c. Milk*
- d. Butter*
- e. White Sugar*

Please give the reasons for your answer in each case and state the length of time for which they should be maintained.

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*Patrons: The Rt Hon the Lord Howe of Aberavon, Kt, CH, QC;
Ian Taylor MP; The Lord Taverne, QC; Dr Nick Palmer MP*



Yes. Whatever the general arguments for or against deregulation, we see no good reason why the items listed should be regarded as “special cases” and feel that it would be confusing for consumers if deregulation occurred on different dates for different products.

However, we would add that when deregulation occurs, it is essential that consumers are better informed about the concept of “unit pricing”. The main justification for deregulation advanced by the European Commission was that prescribed quantities are unnecessary since consumers can use the unit price to make value for money comparisons. However, there is evidence* from the former National Consumer Council that unit pricing is little used or understood by consumers. In order to prevent consumer detriment, the Government should therefore undertake a campaign of public education to explain unit pricing and prepare consumers for this important change in the regulations that currently protect them from misleading packaging.

*Cullum, P and Terry, A (2007) [“Measuring up: consumer perceptions of weights and measures regulation”](#) NCC

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

No. We feel that, provided that the quantity dispensed is clearly marked and the unit price displayed, there is no need to prescribe quantities that may be sold. This is for the following reasons:

1. It would allow wider choice for both customers and pubs and restaurants in the quantity they buy and sell. Pubs that wish to continue to sell in traditional measures would be free to do so, and pubs and restaurants that wish to experiment with different quantities could also do so. This could be of particular interest to Austrian or German “theme pubs” or Spanish-style tapas bars and restaurants, who may wish to dispense draught beer in convenient metric measures such as 500 ml or 300 ml.
2. It would be consistent with the availability of non-prescribed quantities (e.g. 500 ml or 330 ml) in bottles and cans in supermarkets and off-licences and even the same pub, and, especially if the unit price is displayed (as we propose), it would thus facilitate more transparent price comparisons and better information for consumers.
3. The current control on beer glass sizes – the “crown stamping” of glasses – could easily be replaced by a regime of approving the accuracy of the stated quantity indication – e.g. by a line marked on the glass. This would also have the incidental advantage that drinkers would be able to verify whether they were receiving the quantity of liquid that they had ordered.
4. The use of metric quantities could have important benefits for health. If it were permitted to dispense beer and cider in metric quantities it would be easy to calculate the quantity of pure alcohol being consumed. For example, if the “alcohol by volume” (ABV) of a beer is 4%, then it is easy to calculate that the alcoholic content of a 300 ml glass is 0.04×300 ml, i.e. 12 ml, which is 1.2 “units” of alcohol. Similarly, a 175 ml glass of wine at 12% ABV contains 21 ml of alcohol (2.1 “units”). Such relatively simple calculations are much less easy with imperial measures.



5. Deregulation would enable customers to order smaller quantities than the current minima (currently 125 ml for wine and 189 ml for beer and cider) for example if they want to sample small “taster” quantities of “real ales” without becoming excessively intoxicated.

3.3 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?

No. We do not support the retention of prescribed quantities, and as 2/3 of a pint is only 94 ml more than 1/2 a pint, we do not think the addition of one more arbitrary permitted quantity would significantly widen consumer choice. As we have noted above, it would be better to deregulate.

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

As we do not favour the retention of prescribed quantities, it follows that we would support the dispensing of wine in any quantity desired.

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

We would support this proposal if and only if there is a requirement to declare the weight of the loaf and the unit price. This would bring the rules for the sale of unwrapped bread into line with the rules for other “loose goods” and would enable customers to buy half a loaf or a quantity of bread rolls in the same way that they buy meat, fish or cheese – that is, by weight. The density of bread (weight/volume) is very variable and the apparent size of a loaf is a poor indicator of its true amount. Without the safeguard of an indication of weight, the deregulation of unwrapped bread would result in customers not being able to make price comparisons with wrapped bread, and in this case we would oppose the proposal.

3.6 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?

As we do not favour prescribed quantities in principle, we do not favour their extension.

3.7 Should fortified wines continue to be subject to specified quantities?

As we do not favour prescribed quantities in principle, we do not favour their retention for fortified wines (provided that the quantity dispensed is clear and the unit price is displayed).

3.8 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?

We are not experts on public health, but we note that the current rules have resulted in a choice of 125, 175 or 250 ml wine glasses, with the two larger sizes being more prevalent. This may well have led to excessive consumption. We feel it would be better if customers were not constrained by this limited range of glass sizes and were



able to order smaller quantities (e.g. 100 ml) if they wish. Deregulation would facilitate this.

3.9 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?

We would point out that there is an elementary error in draft Article 24, which refers to "units of liquid". There is of course no such thing as a "unit of liquid". The issue addressed in this Article is whether to measure liquids by mass or by volume, and as the Article refers to litres, centilitres and millilitres, the Commission clearly means "units of volume". You may wish to ask the Commission to correct this error in their final proposal.

General questions

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

As noted above, we are concerned that deregulation of package sizes should be accompanied by a campaign of public education to help consumers to understand better the concept of "unit pricing". We think that, as part of such a campaign, shops should be required to display prominently explanatory information about unit pricing. Moreover, we feel that the threshold above which "small shops" do not need to indicate unit prices (280 m² floor space) is too high, as it excludes medium sized high street shops. We think the threshold should be lowered to 150 m².

Costs

3.11 Can you;
(a) identify any types of costs or benefits for your business or more generally resulting from these proposals?
(b) quantify those costs or benefits?

The deregulation of prescribed quantities for draught beer and cider would have nil cost for pubs and restaurants that opt to continue to dispense in the currently prescribed quantities. They could continue to use existing glasses.

Pubs and restaurants that wish to take advantage of the proposed facility to dispense in other measures would need to make a commercial decision on whether to replace their stock of glasses. However, we understand that, when purchased in bulk, the average cost of a one pint beer glass is considerably less than £1 (See, for example, <http://www.barmans.co.uk/products/product.asp?ID=2351&title=Nonic+Pint+Glasses>). We also understand that the average pub has approximately 200 pint glasses, so that their immediate replacement on Day 1 would cost a maximum of £200, less any disposal value of the glasses replaced. We do not think these costs are significant. Moreover, we also understand that the average life of a beer glass is nine months, so there could be opportunities for gradual replacement at nil additional cost.



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A campaign of public education about the concept of unit pricing would have a cost, primarily to the Exchequer. This should be part of the normal function of Government and should be met from existing budgets. The benefit would be better informed consumers, able to make better value-for-money judgements.

Yours sincerely

Derek Pollard
Secretary