

Consultation response:

Choice on Units of Measurement:

Markings and Sales

Which? is the UK's consumer champion. As an organisation we're not for profit - a powerful force for good, here to make life simpler, fairer and safer for everyone. We're the independent consumer voice that provides impartial advice, investigates, holds businesses to account and works with policymakers to make change happen. We fund our work mainly through member subscriptions, we're not influenced by third parties and we buy all the products that we test.

Summary

Which? welcomes the opportunity to respond to this consultation. During the current cost of living crisis it is important, now more than ever, for consumers to be able to understand and compare the prices they are being charged. The metric system has been taught in UK schools since 1974, so a large percentage of UK citizens have little or no experience of imperial measurements, and we are concerned some of the proposals outlined in the consultation would be of significant detriment to consumers' understanding of product pricing.

We do not believe that removing metric measurements from products and replacing them only with imperial measurements will aid consumer understanding. Therefore, Which? does not support the proposal to allow traders to use imperial measures without metric equivalents.

Should the Government pursue either a voluntary option or a mandatory requirement on businesses to provide imperial measurements alongside metric ones, it is important for consumer understanding that imperial measures are not displayed more prominently than metric measures.

Which? has set out below our concerns regarding the proposals outlined in the consultation as they relate to consumers and local authorities.

For Consumers:

- Simple and transparent price comparison is at the heart of the consumer principle of informed choice. Given a large percentage of the population have gone through an education based on the metric system, making changes to units of measurement for purchases to either remove metric measurements or prioritise imperial measurements

brings a risk of confusion over established practices of price comparison. In the context of the cost-of-living crisis where it is particularly important that consumers can make effective price comparisons to find the best value for money, the adoption of imperial measurements, either without metric equivalents or as the more prominent of the two measurement systems, is likely to confuse consumers and reduce their ability to make informed choices.

- Confident consumers are key for the economy and their confidence in making a purchase derives from a clear understanding of what is on offer and being able to make comparisons. However, there remain challenges in the adoption of adequate and transparent unit pricing which often leave consumers struggling to calculate equivalent values themselves. In this regard we feel that there are significant opportunities to make unit pricing clearer through amendments to the Price Marking Order 2004, rather than more complicated via the proposed changes to units of measurement. This is especially important now that the UK is outside the EU and directive 80/181/EC intended to ensure consistency in units of measurements (across member states).
- There is a risk that the proposals will encourage practices similar to 'shrinkflation', as previously highlighted by W?¹. This is because a change in units of measurement, or changes to the method by which they are displayed or prioritised, will make it harder for consumers to understand if pack sizes have changed.
- As the metric system has been taught in UK schools since 1974 a large percentage of UK citizens have little or no experience of imperial measurements. The proposals which either remove metric, or prioritise imperial measures over metric would thus require to educate consumers about imperial units ² in order for them to be able to make informed choices using a different measurement system. The timescales for this are at odds given how critical it is for consumers to be able to compare prices to manage their budgets during the current cost-of-living crisis.
- Any changes to the units of measurement to prioritise imperial would increase trader expenses due to the required changes in the measurements infrastructure and measuring instruments for them to continue to be accurate and calibrated. Furthermore, any reduction in the consistency of measurement could result in the creation of systemic barriers to efficient cross border trade, and increased expenses for those exporting and importing products from abroad. Ultimately, the proposals to change units of measurement could result in UK consumers having less choice at increased prices.

For local authorities:

- The proposal will impact on the role of TSS by requiring officers to spend significant resources enforcing the transition at a time when the provision of other TSS services will be essential to help protect consumers from the impacts of the cost-of-living crisis.

¹ http://intranet.which.co.uk/magazines/which/2019/03_March/p25-28_ShinkingProducts_R3a.pdf/

² <https://www.tradingstandards.uk/news-policy/news-room/2022/trading-standards-body-urges-caution-on-reintroduction-of-imperial-markings/>

- This proposal comes at a time when there is limited capacity within TSS to enforce crucial weights and measures legislation³. Any change in measurements would require a significant effort by metrologists, other regulators, and local Government. However, with more than 50% of officers cut in less than seven years and with legal metrology declining in local enforcement priorities⁴, there has never been a higher threat to businesses, consumers and the economy from losses due to inaccurate measurement and short weight or measure.

Which?

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³ <https://www.tradingstandards.uk/news-policy/news-room/2021/ctsi-letter-to-the-consumer-minister-possible-re-introduction-of-imperial-measures/>

⁴ https://www.journaloftradingstandards.co.uk/wp-content/uploads/2018/11/CTSI_Brexit_Think_Tank_Full_Report.pdf