

Alcohol strategy consultation

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Page 1: About you

Q1. Please select if you would like your response or personal details to be treated as confidential.

No Response

Score

0

Q2. Which of the following best describes you or the professional interest you represent? Please select one option from the menu below.

Large business involved in licensed trade / club premises

Please specify which organisation, licensing authority or police force you represent in the box below:

Wm Morrison Supermarkets plc

Score

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Q3. If you are responding on behalf of an organisation or interest group, please write in the box below the number of members in your group or organisation.

130000

Q4. How did you obtain the views of your members? Please explain in the box below keeping your response to a maximum of 100 words.

No Response

Q5. Please indicate in which region you or your organisation is based. Please select one option from the menu below.

Yorkshire and the Humber

Score

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Q6. If you are responding as a member of the public, what is your gender? Please select one option.

No Response

Score

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Q7. If you are responding as a member of the public, what is your age? Please select one option.

No Response

Score

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Page Score

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Page 2: A minimum unit price for alcohol

Q8. In the alcohol strategy, the government committed to introducing a minimum unit price for alcohol in England and Wales. This consultation will contribute to the debate on the most appropriate price per unit and the mechanism by which, once set, minimum unit pricing would remain effective. It is also an opportunity for interested parties to raise other issues around minimum unit pricing. The purpose of minimum unit pricing is to reduce alcohol consumption, particularly by the most hazardous and harmful drinkers who tend to show a preference for the cheapest alcohol products. By doing so the government estimates there will be a reduction in the associated crime and health harms, especially the numbers of hospital admissions, alcohol-related deaths and alcohol-related crimes. Minimum unit pricing is not intended disproportionately to affect responsible drinkers or particular social groups but to reduce the availability of alcohol sold at very low or heavily discounted prices. More information (including the definitions of hazardous and harmful drinkers) is available in the full consultation document and the impact assessment. Do you want to answer questions on minimum unit pricing? Please select one option.

Yes

Score

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Page Score

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Page 3: A minimum unit price for alcohol

Q9. The impact of minimum unit pricing will depend on the price per unit of alcohol. The government wants to ensure that the chosen price level is targeted and proportionate, whilst achieving a significant reduction of harm. The government is therefore consulting on the introduction of a recommended minimum unit price of 45p. The government estimates a reduction in consumption across all product types of 3.3 per cent, a reduction in crime of 5,240 per year, a reduction in 24,600 alcohol-related hospital admissions and 714 fewer deaths per year after ten years. Do you agree that this minimum unit price level would achieve these aims? Please select one option.

No

If you think another level would be preferable, please set out your views on why this might be in the box below (keeping your views to a maximum of 200 words):

We do not believe that a minimum unit price is a fair, targeted or proportionate way to tackle harmful alcohol consumption. No other country has successfully implemented a minimum unit price (Canada is not a comparable example) and we are concerned that the Government is basing its policy on an outdated statistical model, which the Adam Smith Institute recently concluded is "entirely speculative." What is clear is that a 45p MUP will make alcohol more expensive for the vast majority of responsible consumers and will hit the poorest hardest. It is unfair to penalise the 78% of consumers who drink within

NHS guidelines in an attempt to change the behaviour of a minority, who in all likelihood will simply forgo spending in other areas. When alcohol consumption is already in steady and sustained decline and household budgets are under enormous strain, the Government should focus on targeted interventions rather than blanket measures which restrict the affordability of alcohol for all. We do not argue for inaction. Morrisons is taking a range of measures to foster a culture of responsible drinking. This includes clear information for drinkers, participation in collaborative community initiatives, an expanding range of lower alcohol products, and an industry-leading approach to preventing under-age sales. We are signed up to all of the relevant alcohol pledges as part of the Government's Responsibility Deal and are delivering on these commitments.

Score

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Q10. Should other factors or evidence be considered when setting a minimum unit price for alcohol? Please select one option.

Yes

If yes, please specify these in the box below (keeping your views to a maximum of 200 words):

We believe that the impact of MUP on responsible consumers has been considerably underestimated in the impact assessment. We would challenge two statements in particular. The first is that "there is expected to be a limited impact on responsible consumers". In reality, moderate consumers of cheaper alcohol will be hit hard in the pocket. To illustrate this point, a couple who share three £3.69 bottles of 13% ABV wine a week (within NHS guidelines) will pay £109 more over the course of a year under the Government's plans. This compares with the extra £7 the consultation document estimates responsible drinkers will have to pay. The second statement we would challenge is that "evidence suggests that low income consumers tend not to purchase off-trade alcohol". This is not our experience. While richer households are more likely to purchase alcohol, research shows that more than 75% of households with incomes under £10,000 buy off-trade alcohol. As lower income households pay less for alcohol, they will be disproportionately affected by a 45p MUP. According to recent analysis by the Centre for Economic and Business Research, the poorest 20% of households will pay 90% of the estimated extra annual cost of this policy, while the richest 10% will pay less than 2% of the bill. Another factor which should be given serious consideration is the potential for higher prices to force customers to look elsewhere for alcohol. For some consumers this could mean crossing to France. It could also prompt an increase in illicit trade. The UK already loses more revenue from the cross-border movement of alcohol than any other EU state, while seizures of counterfeit alcohol by Trading Standards increased five-fold between 2008/09 and 2010/11. It is hard to see how MUP will do anything other than exacerbate these trends.

Score

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Q11. The government wishes to maintain the effectiveness of minimum unit pricing and is therefore proposing to adjust the minimum unit price level over time. How do you think the level of minimum unit price set by the government should be adjusted over time? Please select one option.

The minimum unit price should be reviewed after a set period

Score

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Q12. The aim of minimum unit pricing is to reduce the consumption of harmful and hazardous drinkers, while minimising the impact on responsible drinkers. Do you think that there are any other people, organisations or groups that could be particularly affected by a minimum unit price for alcohol? Please select one option.

Yes

If yes, please specify in the box below (keeping your views to a maximum of 100 words):

As set out above, we are concerned that MUP will penalise responsible drinkers and hit the poorest hardest. We do not believe that responsible drinkers should pay more because of the actions of a minority of hardened drinkers who are likely to carry the price increase or forgo spending in other areas. There is also a considerable risk that own brand alcohol will be disproportionately affected by a minimum unit price as its competitive advantage on price will be undermined. Reducing the price differential

between own brands and branded products will in all likelihood force some smaller producers out of business, reducing consumer choice and putting jobs at risk.

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Page 4: A ban on multi-buy promotions in the off-trade

Q13. The government is consulting on introducing a ban on multi-buy promotions in the off-trade (e.g. shops and off-licences) as part of its wider strategy to reduce excessive alcohol consumption, and alongside the introduction of a minimum unit price. A ban on multi-buy promotions would therefore not apply to pubs, clubs, bars or restaurants. The term 'multi-buy promotions' refers to alcohol promotions that offer a discount for buying multiple items. The aim of a ban would be to stop promotions that encourage people to buy more than they otherwise would, making it cheaper (per item) to purchase more than one of a product than to purchase a single item. As well as being part of a wider strategy to reduce consumption and tackle irresponsible alcohol sales, a ban on multi-buy promotions would also contribute to the government's aim of encouraging people to be aware of how much they drink and the risks of excessive drinking, so that they can make informed choices. The aim of this consultation is to assess support for such a ban and contribute to our understanding of the impact a ban on multi-buy promotions may have. The types of promotion it is proposed that a ban would include, are: two for the price of one, three for the price of two, buy one get one free, buy six and get 20 per cent off, 24 cans of lager costing less than 24 times the cost of a single can of lager in the shop, a case of wine sold cheaper than the individual price at which the same bottles are sold in the shop, 3 for £10 where each bottle costs more than £3.33. More information is available in the full consultation document and the impact assessment. Do you want to answer questions on a ban on multi-buy promotions in the off-trade? Please select one option.

Yes

Score

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Page Score

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Page 5: A ban on multi-buy promotions in the off-trade

Q14. Do you think there should be a ban on multi-buy promotions involving alcohol in the off-trade? Please select one option.

No

Score

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Q15. Are there any further offers which should be included in a ban on multi-buy promotions? Please select one option.

No

Score

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Q16. Should other factors or evidence be taken into account when considering a ban on multi-buy promotions? Please select one option.

Yes

If yes, please specify in the box below (keeping your views to a maximum of 200 words):

The Government should consider why customers take advantage of multi-buy promotions. It is not for immediate consumption but to be enjoyed over a period of time or for entertaining. This is why multi-buy promotions increase in number around major sporting events and public holidays: because customers want to stock up in the most cost-effective way before hosting a social gathering. Research we conducted previously in Scotland supports this. 86% of our shoppers said they bought alcohol on promotion to stock up or have on hand to drink later. 68% said that the alcohol was for a social occasion or party when the alcohol would be shared with other people. We find simplistic the assertion that this policy will "remove the incentives for customers to buy more alcohol than they really want". In reality customers are much savvier than the consultation implies and will take advantage of promotions when they are available and consume them over longer periods. The consultation proposes to remove multi-buy promotions but has produced no evidence which demonstrates a link between these deals and problems of crime and anti-social behaviour. Early evidence from Scotland where a ban on quantity discounts has been in force since October 2011 does not support its introduction elsewhere in the UK. According to NHS Scotland: "There has been no obvious change in weekly trends of off-trade alcohol sales per adult in Scotland in the period of 2011 after the introduction of the quantity discount ban, or during the first part of 2012, compared with trends in previous years or in England & Wales."

Score

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Q17. The aim of a ban on multi-buy promotions is to stop promotions that encourage people to buy more than they otherwise would, helping people to be aware of how much they drink, and to tackle irresponsible alcohol sales. Do you think that there are any other groups that could be particularly affected by a ban on multi-buy promotions? Please select one option.

Yes

If yes, please specify in the box below (keeping your views to a maximum of 100 words):

Banning multi-buy promotions would penalise the majority of consumers who drink responsibly at a time when value in household spending matters the most. Morrisons does not have promotions which offer "free" alcohol (e.g. buy one get one free) because we do not believe that this would be consistent with our commitment to responsible retailing. We do offer quantity discounts, for example when purchasing multiple bottles of wine or a second case of beer, which are welcomed by customers on tight budgets. Customers will usually take advantage of a promotion when it is available and then store it at home and drink it over a longer period, often with family and friends. The majority of responsible consumers should not be denied the opportunity to save money on larger purchases in this way, particularly in the absence of any evidence to suggest that this will be effective in achieving the Government's aims. The Government should also consider the potential use of store loyalty schemes to reward customers for alcohol purchases, which would effectively circumvent the impact of minimum pricing or restrictions on promotions, and create an uneven playing field for retailers.

Score

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Page Score

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Page 6: Reviewing the mandatory licensing conditions

Q18. In its response to the 'Rebalancing the Licensing Act' consultation in 2010, the government committed to review the impact of the current mandatory licensing conditions. More recently, the alcohol strategy made a commitment to review these mandatory licensing conditions to ensure they are sufficiently targeting problems such as irresponsible promotions in pubs and clubs. The government has also committed to consult on whether these mandatory licensing conditions should, where relevant, apply to both the on- and off-trade. This consultation forms part of that review, and will contribute to the government's understanding of how these mandatory conditions are perceived. The five mandatory licensing conditions currently set out in regulations in relation to the supply of alcohol are: a ban on irresponsible promotions a ban on dispensing alcohol by one person directly into the mouth of another a requirement to provide free tap water on request to customers a requirement to have an age verification policy to prevent the sale of alcohol to persons under 18 years of age, and a requirement to make

available to customers small measures such as half pints or beer or cider or 125ml glasses of wine More information is available in the full consultation document. An explanation of each of these terms can be found on page 20 of the consultation document, in the glossary at the end. Do you want to answer questions on reviewing the mandatory licensing conditions? Please select one option.

Yes

Score

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Page Score

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Page 7: Reviewing the mandatory licensing conditions

Q19. Do you think each of the mandatory licensing conditions is effective in promoting the licensing objectives? For more information on the licensing objectives please see the glossary at the end of the full consultation document. Please select one option (Yes, No, Don't know) from each drop down menu.

	Prevention of crime and disorder	Public safety	Prevention of public nuisance	Protection of children from harm
Irresponsible promotions	-	-	-	-
Dispensing alcohol directly into the mouth	-	-	-	-
Mandatory provision of free tap water	-	-	-	-
Age verification policy	Yes	Yes	Yes	Yes
Mandatory provision of small measures	-	-	-	-

Score

0

Q20. Do you think that the mandatory licensing conditions do enough to target irresponsible promotions in pubs and clubs? Please select one option.

No Response

Score

0

Q21. Are there other issues related to the licensing objectives which could be tackled through a mandatory licensing condition? Please select one option.

No

Score

0

Q22. Do you think that the current approach, with five mandatory licensing conditions applying to the on-trade and only one of those to the off-trade, is appropriate? Please select one option.

Yes

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Page Score

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Page 8: Health as a licensing objective for cumulative impact policies

Q23. We want to ensure that licensing authorities are able to take alcohol-related health harms into consideration when making decisions about cumulative impact policies (CIPs) which can be used to manage problems linked to the density of premises in specific areas. A CIP introduces a rebuttable presumption that all new licence applications and variations in that area will normally be refused if the licensing authority receives a relevant representation stating that the application will add to the cumulative impact. However each application must still be considered on its own merits and the licensing authority may still grant the application if it is satisfied that the application will not contribute to the cumulative impact. We are proposing that licensing authorities will be able to take evidence of alcohol-related health harm into account in deciding whether to introduce a CIP and the extent of that CIP. This would be a discretionary power and not an obligation. We expect that those areas with the highest levels of alcohol-related health harm, or fast rising levels of harm from alcohol, will be most likely to use this power. It will allow local health bodies to fully contribute to local decision making and mean licensing authorities can restrict the number of licensed premises in the local area on the basis of robust local evidence. More information is available in the full consultation document and impact assessment. Do you want to answer questions on health as a licensing objective for cumulative impact policies? Please select one option.

Yes

Score

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Page Score

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Page 9: Health as a licensing objective for cumulative impact policies

Q24. What sources of evidence on alcohol-related health harm could be used to support the introduction of a cumulative impact policy (CIP) if it were possible for a CIP to include consideration of health? Please specify in the box below (keeping your views to a maximum of 200 words):

We do not support the proposal to include health as a licensing objective for CIP because it could penalise responsible retailers like Morrisons on the basis of unreliable evidence and despite the operation of strong policies to prevent under-age sales and promote sensible drinking.

It is not evident that sufficiently robust data exists which can tie specific health harms to a particular licensed premises or group of premises. The effectiveness of this policy relies on the existence of such data. Moreover, as alcohol-related health problems such as liver disease are likely to have developed over a number of years it would be wrong to link them to licensing in a local area, particularly as overall and excessive consumption of alcohol is in decline. It is also hard to see how larger supermarkets which attract customers from wide geographical areas can be linked to health outcomes in any given locality.

Another concern surrounds the likelihood of considerable variation in how local authorities would approach health as a licensing objective for CIP. As we set out in response to Q33, inconsistency in local authority approaches creates uncertainty for national businesses and makes the development of uniform policies extremely challenging.

Q25. Do you think any aspects of the current cumulative impact policy process would need to be amended to allow consideration of data on alcohol-related health harms? Please select one option.

No Response

If yes, please specify which aspects in the box below (keeping your views to a maximum of 200 words):

As we have stated in answer to the previous question, we do not support the inclusion of health as a licensing objective for CIP. If the Government does decide to proceed with the proposal we believe licensing authorities should take full account of the steps that retailers like Morrisons are taking to help customers drink responsibly and reduce their chances of health harms. For example, we have signed up to all of the relevant pledges on alcohol as part of the Government's Public Health Responsibility Deal, including clear labelling of units, support for the Drinkaware Trust and participation in Community Alcohol Partnerships (CAP). We believe it would show a lack of joined-up government for the Home Office to introduce a measure on the grounds of health which impacts companies that are actively supporting the Department of Health's main public health policy.

Score

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Q26. What impact do you think allowing consideration of data on alcohol-related health harms when introducing a cumulative impact policy would have if it were used in your local area? Please specify your answer in the box below, providing evidence to support your response (keeping your views to a maximum of 200 words):

A cumulative impact policy (CIP) that prevents responsible companies from opening stores is counter-productive and puts investment in towns and cities at risk.

The introduction of a responsible retailer to an area not only brings jobs, investment and greater customer choice. Morrisons can make a positive contribution to alcohol-related problems, for example through the development of Community Alcohol Partnerships which involve retailers, local authorities and police to tackle alcohol-related anti-social behaviour, and by sharing age verification training with smaller shops which often lack the necessary resources.

A more restrictive CIP based on health harms is likely to inhibit grocery development and prevent local areas sharing in the benefits that responsible retailers bring.

Page Score

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Page 10: Freeing up responsible businesses

Q27. The government has committed to consult on giving licensing authorities greater freedom to take decisions that reflect the needs of their local community. Following the government's Red Tape Challenge in 2011, three areas of reform were specified: alcohol licensing for certain types of premises providing minimal alcohol sales, temporary event notices (TENs) and the licensing of late night refreshment. This section asks for views on these proposals and suggests further ways to reduce burdens on business. The proposals set out here can be seen alongside work undertaken by the Department for Culture, Media and Sport to remove unnecessary red tape from regulated entertainment. More information on each of these areas for reform is available in the full consultation document. There are five subjects covered in this section. They are: ancillary sales of alcohol, occasional provision of licensable activities at community events, an extension of the temporary event notice limit at individual premises, late night refreshment, and further proposals to reduce burdens on business. Do you want to answer questions on freeing up responsible businesses? Please select one option.

Yes

Score

0

Page Score

Page 11: Freeing up responsible businesses

Q28. Ancillary sales of alcohol For many businesses, the sale of alcohol is only a small part of, or incidental to, their wider activities, and occurs alongside the provision of another product or service (which this consultation refers to as an 'ancillary sale'). For example, a guesthouse might wish to provide wine to its guests with an evening meal or a complimentary bottle of wine in a guest's room, while a hairdresser might wish to offer clients a glass of wine. Should special provision to reduce the burdens on ancillary sellers be limited to specific types of business, and/or be available to all types of business, providing they meet certain qualification criteria for limited or incidental sales? Please select one option in each row.

No Response

Score

0

Q29. If special provisions to reduce licensing burdens on ancillary sellers were to include a list of certain types of business, do you think it should apply to the following? Please select one option in each row.

No Response

Score

0

Q30. Do you have any suggestions for other types of businesses to which such special provision could apply without impacting adversely on one or more of the licensing objectives? Please write your suggestions in the box below, keeping your views to a maximum of 200 words:

No Response

Q31. The aim of a new 'ancillary seller' status is to reduce burdens on businesses where the sale of alcohol is only a small part of their business and occurs alongside the provision of a wider product or service, while minimising loopholes for irresponsible businesses and maintaining the effectiveness of enforcement. Alternatively, a second option is to broaden the definition of 'ancillary sales' to include all businesses (and/or not for profit activities) through the use of a general set of qualification criteria, for example, to the effect that: alcohol must be sold or supplied as a small part or proportion of a sales transaction or contract for a wider service, and the amount of alcohol that could be supplied as part of that contract cannot exceed a prescribed amount Do you think that the qualification criteria proposed meet this aim?

No Response

Score

0

Q32. Do you think that these proposals would significantly reduce the burdens on ancillary sellers? Please select one option in each row.

No Response

Score

0

Q33. Do you think these proposals would impact adversely on one or more of the licensing objectives? Please select one option.

No Response

Score

0

Q34. What other issues or options do you think should be considered when taking forward proposals for a lighter touch authorisation? Please specify in the box below keeping your response to a maximum of 200 words:

No Response

Page Score

0

Page 12: Freeing up responsible businesses

Q35. Do you agree that licensing authorities should have the power to allow organisers of community events involving licensable activities to notify them through a locally determined notification process? Please select one option.

No Response

Score

0

Q36. What impact do you think a locally determined notification would have on organisers of community events? Please select one option in each row.

No Response

Score

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Page Score

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Page 13: Freeing up responsible businesses

Q37. Should the number of TENs which can be given in respect of individual premises be increased? Please select one option.

No Response

Score

0

Q38. If you answered yes, please select one option to indicate which you would prefer. Please select one option.

No Response

Score

0

Page Score

Page 14: Freeing up responsible businesses

Q39. Do you think that licensing authorities should have local discretion around late night refreshment in each of the following ways? Please select one option in each row.

	Yes	No	Don't know
Determining that premises in certain areas are exempt	X		
Determining that certain premises types are exempt in their local area	X		
Score			
0			

Q40. Do you agree that motorway service areas should receive a nationally prescribed exemption from regulations for the provision of late night refreshment? Please select one option.

Yes	
Score	
0	

Q41. Please describe in the box below any other types of premises to which you think a nationally prescribed exemption should apply (keeping your views to a maximum of 100 words).

No Response

Page Score	
0	

Page 15: Freeing up responsible businesses

Q42. Do you agree with each of the following proposals? Please select one option in each row.

	Yes	No	Don't know
Remove requirements to advertise licensing applications in local newspapers	X		
Remove the centrally imposed prohibition on the sale of alcohol at MSAs for the on and off-trade	X		
Remove the centrally imposed prohibition on the sale of alcohol at MSAs, but only in respect of overnight accommodation - lodges		X	
Remove or simplify requirements to renew personal licences under the 2003 Act	X		
Score			
0			

Q43. Do you think that each of the following would reduce the overall burdens on business? Please select one option in each row.

	Yes	No	Don't know
Remove requirements to advertise licensing applications in local newspapers	X		
Remove the centrally imposed prohibition on the sale of alcohol at MSAs for the on and off-trade	X		
Remove the centrally imposed prohibition on the sale of alcohol at MSAs, but only in respect of overnight accommodation - lodges		X	
Remove or simplify requirements to renew personal licences under the 2003 Act	X		

Score

0

Q44. Do you think that the following measures would impact adversely on one or more of the licensing objectives (see glossary)? Please select one option in each row.

	Yes	No	Don't know
Remove requirements to advertise licensing applications in local newspapers		X	
Remove the centrally imposed prohibition on the sale of alcohol at MSAs for the on and off-trade			X
Remove the centrally imposed prohibition on the sale of alcohol at MSAs, but only in respect of overnight accommodation - lodges			X
Remove or simplify requirements to renew personal licences under the 2003 Act		X	

Score

0

Q45. In addition to the suggestions outlined above, what other sections of or processes under the 2003 Act could in your view be removed or simplified in order to impact favourably on businesses without undermining the statutory licensing objectives or significantly increasing burdens on licensing authorities? (Please keep your views to a maximum of 200 words.)

Measures that promote consistency across all authorities would be of considerable benefit and would help to drive a high standard of compliance across the UK. Currently, practice across local authorities varies considerably and this creates uncertainty and additional costs for business. We believe greater standardisation would promote compliance, cut unnecessary red tape and reduce costs.

There are many different interpretations of the law around licensing which makes efficient, company-wide training problematic. For example, there is no consistency between local authorities over what constitutes a "substitution", a "minor" or a "major" variation of a premises licence. While we appreciate that local authorities need to be able to respond to issues unique to their area, promoting greater consistency and ensuring there is a more uniform approach would significantly reduce the burden on businesses.

We are currently participating in a pilot with the Better Regulation Delivery Office with a view to the extension of the Primary Authority Scheme to include the sale of alcohol. The scope of this pilot is limited and further consideration should be given to whether Primary Authority in the alcohol licensing system itself can be extended.

Page Score

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Page 16: Impact assessments

Q46. Impact assessments for the proposals in this consultation have been published alongside the full consultation document. Do you think that the impact assessments related to the consultation provide an accurate representation of the costs and benefits of the proposals? Please select one option in each row.

No Response

Score

0

Q47. Do you have any comments on the methodologies or assumptions used in the impact assessments? If yes, please specify in the box below, clearly referencing the impact assessment and page to which you refer (keeping your views to a maximum of 400 words).

No Response

Page Score

0

Scoring Summary

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