

Dear Senator,

As your constituent and a local business-owner, I am asking you to engage with me on the *Public Health (Alcohol) Bill 2015* (PHAB). I have serious concerns about the proposal in Section 20 of the Bill on structural separation. If implemented as currently proposed, the measure will cause untold damage to my business and livelihood. It poorly researched proposal, which will have far-reaching negative consequences on businesses and communities like my own.

A law on structural separation will require retailers to implement one of two measures. Alcohol products must solely be displayed in either a designated area not visible from the outside, or in a dark cabinet, with correlating advertising restrictions. Refitting stores to accommodate this law in the prescribed timeframe of one year will cause upheaval and have significant cost implications for *all* retailers. It goes without saying, however, that smaller retailers will bear the brunt of the fallout.

In spite of this, no evidence exists to show that structural separation will make any difference in terms of achieving a reduction in harmful drinking, in accordance with the PHAB's stated aim. The Government is seeking to enact legislation that will not achieve its goal and hammer small shops around the country in the process. No empirical or peer-tested research justifies this stringent measure.

Both proposed measures are nothing short of draconian. Under the first proposal, retailers will effectively be required to create a 'store within a store' for the sale of alcohol. To meet criteria, they will be obliged to erect a barrier of at least seven feet high to block the visibility of alcohol from the outside. This is an excessive and overblown proposal, with additional implications around staffing, health and safety, security and disability access. Mounting incremental overheads will likely result in a need to increase retail prices. This could, in turn, drive customers to larger retailers, who can afford to absorb the extra costs and pay the difference themselves.

Under the alternative proposal, retailers must store alcohol products in a closed storage unit (or units), which does not adjoin any other types of product. This proposal seems to be targeted at smaller stores that are unable to facilitate a physical barrier and visibility requirements, mainly affecting stores with wine-only licences. Not only is it an overreaction to require retailers to hide alcohol behind darkened doors but it is thoroughly impractical to boot. Once again, it will only serve to curb the shopping experience of the consumer, to the benefit bigger businesses and brands. The measure is an insult to the vast majority of customers and retailers like myself, who consume and sell alcohol responsibly.

In a nutshell, this is an anti-small business law. It *won't* hurt big retailers but it *will* hurt me. The likes of Tesco, Dunnes, Lidl and Aldi can afford to swallow additional costs and keep their prices down. Meanwhile, smaller shops - the cornerstone of our communities - will be hammered under current proposals.

I ask you, as my local Senator, to engage in dialogue and debate on these issues. I hope that you will work with the relevant stakeholders to ensure that a balance is struck between addressing misuse and safeguarding jobs in our community.

Yours sincerely,