

## Response ID ANON-6WZM-PKRJ-B

Submitted to Choice on units of measurement: markings and sales  
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### About you

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What is your organisation (if relevant)?

Organisation:  
UK Metric Association

Are you happy for your response to be published?

Yes

### Questions for everyone

1a Are there any specific areas of consumer transactions that should be a priority for allowing a choice in units of measurement, and why?

No

Please explain why:

None.

There is no rational justification for allowing "choice", any more than there would have been for allowing choice between decimal currency and pounds, shillings and pence.

Allowing choice to consumers is not an option, and allowing choice to traders is in effect diminishing choice for consumers because, for example, in certain places those who prefer to buy in metric will be deprived of the opportunity to do so. It will reduce the ability to make price comparisons and will therefore make it more likely that consumers will be cheated. The principle of having standard weights and measures throughout the country has been accepted since the Magna Carta. There is no benefit in having dual units.

1b Are there any specific areas that you think should be excluded from a choice in units of measurement, and why?

Yes

Please explain why:

All, for the reasons stated above.

There is a particular problem where traders can cheat the consumer by making prices look lower when they are not. An example is carpets sold by the square yard, which creates an illusion of cheapness compared to pricing by square metres.

1c If an item is sold in imperial measures, should there be a requirement for a metric equivalent alongside it?

Yes

Please explain further if you wish:

Yes.

Currently, the only goods that are sold in imperial measures are draught beer and cider, and doorstep delivered milk. All other goods are sold in metric measures. Because the option for supplementary indications in imperial units already exists, there is no reason to create confusion by allowing some goods to be sold in imperial units.

### Questions for business

2 What would be the consequences of your business having the freedom to sell products in imperial measures, if you wished?

Please respond here:

This is a badly phrased question. It also makes an incorrect assumption.

Such few businesses as wish to sell in imperial measures have the right to do so, the only requirement is that they add an equally prominent metric equivalent, which is clearly in the interests of the consumer.

The Confederation of British Industry wrote to the Secretary of State for Trade and Industry in 1970:

"After five years intensive preparation industry is now irrevocably committed to metrication. Millions of pounds worth of the new and replacement equipment purchased by industry in recent years is designed to produce to metric standards; thousands of man hours have gone into planning and implementing conversion programmes. Progress is well up to schedule. The impetus of change is growing rapidly. There can be no turning back. Metrication provides big advantages, not only to industry but to the economy as a whole. It is simple both to teach and to use. It offers great scope for rationalisation and variety reduction in factory, warehouse and shop. It offers greater export opportunities in an increasingly metric world. It will greatly cause the harmonisation of international standards, increasingly important for the removal of barriers to trade. The sooner these advantages can be realised to offset the inevitable costs of change, the better. To delay is to get the worst of both worlds."

Many of the key professional organisations have already declared strong opposition to the current proposals. These include the British retail Consortium, the British weighing Federation, the National Consumer Federation, The Chartered Trading Standards Institute, and indeed the National Market Traders Federation, as well as major retailers such as Asda and John Lewis.

### Questions for consumers

3a If you had a choice, would you want to purchase items (i) in imperial units? (ii) in imperial units alongside a metric equivalent?

Not Answered

Please explain further if you wish:

Neither of these. (iii) in metric units, which is the status quo in the UK and most of the rest of the world. In the longer term, we would also argue for (iv) the removal of optional supplementary indications in imperial, as this will help to reduce all remaining possibility of confusion regarding measures used for trade. There is no rational justification for rolling back on this. This has been UK government policy since 1965, and there is no reason for that to change.

It is false to say that the proposals increase choice for consumers. If traders are given the choice to omit parallel metric markings as in (i) above, the consequence for consumers is that their choice to buy in metric has been taken away. There is therefore a diminution rather than an enhancement of choice. This will be a particular problem for people under 50, and of course for those visiting or moving from other countries, of whom there are many. 6 million EU nationals living in the UK have applied for settled status.

The advantages of metric units are numerous. They are the primary units which have been taught in school since 1974. They have long been in use in science, medicine, pharmacy, manufacturing, international trade, building, cookery and even sport. Metric units have a clear relationship to each other, so that it is exactly 10,000 km from the North Pole to the Equator, and a litre of water occupies a cube with dimensions of 10 cm and weighs precisely one kilogram. Because of these facts metric units are simple, coherent and intuitive. Furthermore converting between different units, such as from millimetres to kilometres, simply involves moving a decimal point. In contrast, converting between imperial units, e.g. ounces and tons or feet and miles, involves the use of multiple different illogical multipliers, some of which are not even integers. Even with the use of a calculator such units are very difficult to work with. An example of this is units of length, where the multipliers are 12, 3, 5.5, 40 and 8. To make matters worse, very few members of the public even know these multipliers, as was dramatically shown on a recent television interview with Lord Stephen Parkinson, who had been advocating the use of imperial units but thought that there were 14 ounces in a pound. Failure to use the correct multipliers is a source of error and, in some circumstances, of risk.

As far as the proposals relate to weight of produce, this is a category not covered by exemptions in current legislation. The current exemptions extend only to the use of the mile, yard and pint. Pounds and ounces are still in use for some occasional purposes, although grams are more prevalent among major retailers and in recipes. Imperial units such as the grain, pennyweight and hundredweight are no longer in use, and since 1981 the Imperial ton has been withdrawn in the UK in favour of the metric tonne. So even retailers who sell in imperial will have to convert to metric where large quantities are involved. There is no possibility of reintroducing the grain, pennyweight and hundredweight as few below the age of 60 understand them. Further, reverting to 2 different kinds of ton(ne) is a formula for disaster.

Food wholesale and livestock sales have been metric-only since the 1970s. For retailers to use imperial units in any way at all, creates extra work, and needless conversion calculations which can lead to errors.

3b Are you more likely to shop from businesses that sell in imperial units?

No

Please explain further if you wish:

Of course not. There is no reason to do so. We are not asked whether we would be more likely to shop in businesses that sell in metric units. This is indeed the case.

3c Do you foresee any costs or benefits to you from businesses being permitted to sell: (i) solely in imperial units? (ii) in imperial units alongside a less prominent metric equivalent?

(i) Solely in imperial units:

Significant costs and no benefits whatsoever. Either (i) or (ii) would involve a change from the system currently in use, the implementation of which was itself a complex process. . Very few businesses would voluntarily opt to do this. If it became a requirement to remove metric markings or to make them less prominent, it would have an impact on the packaging and labelling of products which would carry additional costs. The British Retail Consortium has come out strongly against the proposed change, and with good reason.

(ii) In imperial units alongside a less prominent metric equivalent?:

See above. Currently supermarkets etc display a metric equivalent with at least equal prominence. There is no reason for this to change. To make the metric equivalent less prominent would involve re-engineering the labelling process on shelving. It is current practice in sale of groceries to show price per 100g, so that price comparisons between different pack sizes and different brands are possible. This is what consumers are used to, it has been in place for many years and is widely understood. To cease this practice would be to remove an important element of consumer protection.

3d Do you have experience of buying solely in imperial units?

Yes

Please expand on your response if you wish:

The question is not relevant.

Some of the older members of our organisation can remember a time when imperial was the norm in the UK. However, even they would struggle to adapt to imperial measures because it is so long ago. Our younger members will find them mystifying as the primary units they were taught at school since 1974 were metric.

The other experience we would have had of buying in non-metric units would have been on visits to the USA. However this is perhaps deceptive, since many of the primary units used there are different from those used in the UK, including the fluid ounce, pint, gallon and ton.

Occasionally in the past we have come across alternative units when buying loose goods in France and Germany. The French pound ('Livre') and the German pound ('Pfund') is usually defined informally as 500 g. This compares with the UK pound ('lb') which is 454 g. Again, a source of confusion.

## Questions for trading standards

4 What potential impacts might there be on regulatory activity, including any costs or benefits?

Please respond here:

Solely negative. The CTSI, the professional organisation of trading standards officers has declared very clearly that it opposes this change. It is admitted, even by the consultation document, that abolition of metric units is not a possibility, therefore by definition the proposals involve the use of dual units. Therefore, some market traders, for example, will be working in pounds and others in kilograms. Inspectors will be unable to police such a system without buying in a great deal of new and expensive equipment. Their job will be made more difficult and staffing will need to be increased at a time of austerity and skills shortage. This would be a profoundly regressive step.

In addition, it will be to the disadvantage of consumers, who will find it more difficult to compare prices between different vendors, and conversely life will be made easier for those with an interest in defrauding them. Inspectors cannot possibly favour such a state of affairs.