

Ciaran Conroy (Finance)

From: [REDACTED]
Sent: 04 November 2016 23:19
To: FINANCE SSD.TAX
Subject: Public Consultation on proposed Sugar Tax

Dear Sir

Firstly, let me congratulate you on trying to tackle the issue of public obesity and the part sugar drinks play in same.

However I don't believe a tax is the way to go for the following reasons;

- 1) A tax will be complicated to implement and collect.
- 2) A tax won't reduce the sweet tooth of people.
- 3) A tax will financially hit the poorer in society most.
- 4) A tax won't put off those buying drinks who can afford the tax.
- 5) A tax will make soft drinks more expensive in pubs making the designated driver initiative harder to

achieve.

So my suggestion is to reduce the amount of sugar in the drinks over a period of time thereby reducing peoples sweet tooth threshold and at the same time avoid all the above draw backs and industry push back. This can be achieved as follows;

- I) Get all importers / producers to submit to government the amount of sugar in their product.
- II) Pass a law requiring those importers to apply for a licence to distribute in Ireland. As part of the terms of this licence they must undertake to reduce the sugar content by 1% in year 1, 2.5% in year 2 and 5% in year three and each subsequent year until the amount of sugar in the product is 50% of the original amount.
- III) Include in the law a fine large enough to make breaking the law not worthwhile. €50m for first conviction, €100m for second conviction and total sales ban for third conviction.
- IV) Make sure the law doesn't allow for the substitution of sweeteners for the sugar. Remember the purpose is to reduce peoples sugar tolerance not just avoid sugar.
- V) Introduce a random sampling regime from shops, bars, restaurants run by the government to test that the companies are complying.

I believe this approach will not penalise the poor, tackle the true cause of the problem being our sweet tooth and be easier to implement and police. Also I believe that industry won't push back as it won't cost them customers as all drinks will be dropping by the same level each year, the producers will be saving money on their ingredients and the public will get the benefit without rebelling as the reduction will be slow and gradual. This approach could be rolled out on a product by product basis to give an overall reduction in sweetness levels in our diets. Also as importers and local producers will be affected equally no one sector will get a competitive advantage. In addition the drink with the highest sugar content currently available could form the maximum acceptable for new entrants but again the licence would force them to comply with the same rules and start reducing the sugar content immediately even though they would be starting from a lower base to begin with.

Regards