

The Regulation of trading on Sundays in Guernsey – a public consultation document

Purpose and type of consultation

This public consultation document and opinion questionnaire consists of four parts:

1. An introduction, including a brief explanation as to why the Commerce and Employment Department (C&E) is undertaking this work.
2. A brief description of different methods of regulating trading on Sundays.
3. A brief explanation of the requirements of the law together with an explanation of some difficulties which have arisen since the Ordinance was enacted.
4. The response questionnaire.

Opinions are sought from the public at large, retailers, the parishes and other interested individuals or groups. Whilst it is preferred that responses are provided to all the questions, responses to a select number of questions will still be welcomed.

Further information on Sunday trading in Guernsey is available at
www.gov.gg/sundaytrading

Contacts

Further information:

Sunday Trading Consultation
Commerce and Employment Department
Raymond Falla House
P O Box 459
Longue Rue
St Martin
Guernsey

How to contact us

Telephone: (01481) 234567
Email: ts@commerce.gov.gg

How to Respond

Electronic Responses

The easiest way for many to respond to this consultation is to fill in the on-line questionnaire at www.surveymonkey.com/s/sundaytradingconsultation.

Hard Copy Responses

Alternatively you may print out the questionnaire from survey monkey or complete the questionnaire at the end of this document (print out/detach : pages 13 to 18) fill in by hand and return either: post as hard copy / or scanned attachment by email.

PLEASE SEND COMMENTS TO

Sunday Trading Consultation Commerce and Employment Department FREEPOST GU245 Guernsey GY1 5SS	Telephone: (01481) 234567 Email: ts@commerce.gov.gg Fax: (01481) 235015
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Your views will help formulate policy as the Department progresses to the next stage of work on this topic.

The Department wishes to thank you in advance for taking the time to read and respond to this consultation.

Part 1 - Introduction

The present situation

The Sunday Trading Ordinance, 2002 (the current law) resulted from certain key positions of the States at that time. These were:

- There was no enthusiasm on the part of the States for major changes to the legislation existing at that time but anomalies needed to be addressed and a consistent approach developed throughout the Island.
- The emphasis needed to shift from categories of goods to categories of shops.
- In relation to food shops in particular, the emphasis should be to provide reasonable access to small scale shopping for basic provisions on a convenience basis — but not for full scale weekly shopping for the family.
- An outlet which is open for whatever reason on a Sunday should be permitted to sell the full range of its goods.
- The Douzaines should continue to play a key role alongside the then Board of Industry (now Commerce and Employment) in administering Sunday Trading arrangements.
- There should be special recognition of the trading position of certain places of visitor interest, given the States commitment to support the tourist economy.

Why is the Department now consulting on Sunday trading regulation?

The topic of trading on Sundays is often an emotive one, with strong and polarised views being expressed from businesses and the public at large. In the lead-up to the introduction of the Sunday Trading Ordinance, 2002 the States debated the topic of trading on Sundays no less than seven times, including two Requêtees proposing total deregulation. There have been four further debates involving Sunday trading since the 2002 Ordinance was approved by the States. The debates in the Assembly sometimes reflected the strong feelings mentioned earlier. Most people will hold an opinion on whether shops should be permitted to open on Sundays and similarly it is a matter of personal choice as to whether one wishes to visit any shop which might be open.

In 2012 a Requête brought by Deputy Mike Hadley sought to establish a trial period of twelve months during which the Ordinance would be suspended (i.e. it would not be enforced). That Requête was unsuccessful but during the debate the Minister (Deputy Kevin Stewart) gave an assurance to States Members that the Commerce and Employment Department would undertake a review of the regulation of trading on Sundays with a view to reporting back to the States during the term of this current Assembly (i.e. prior to the General Election in April 2016).

Part 2 - Different methods of regulating trading on Sundays

If the States wishes to regulate trading on Sundays there are many different ways of doing so and several different factors which could be incorporated into any new scheme. Your views are sought on which of the following factors should feature in any future regulation of trading on Sundays.

The goods sold (the main factor in the current scheme)

It could be possible to regulate trading by having a list of goods which the States determines can be sold on a Sunday. An item not on the list could not then be sold. However such a list might well be extensive and might not be able to keep pace with new products coming to the market.

A variation to this approach would be to define different types of shops based upon the main types of goods found in each type of shop. For example, newsagents mainly sell newspapers, magazines and stationery. This approach avoids the need to maintain a definitive list of goods which may be sold but nevertheless does maintain a focus on the goods sold.

Relaxing the law at certain times of the year

Some shops have expressed a wish to be able to open on Sundays in the lead-up to Christmas. Other shops have expressed a wish to open on Sundays during the summer months where there is increased tourist activity.

A system could be introduced which allows special opening arrangements at specific times of the year, such as Sundays in the lead-up to Christmas or during the height of the tourist season.

The location of the shop

In some countries a shop's ability to open on Sundays depends upon where the shop is located, with greater freedom being given to shops in tourist or major retail areas, whilst those in rural areas are not able to open.

In Guernsey the distinction between tourist or retail areas and rural areas is not necessarily distinct but the location of the shop could still be a factor in future regulation. Shops located in certain specific areas (such as the town centre, adjacent to beaches or cliffs, or at tourist attractions) could be treated differently than shops elsewhere.

Restricting the opening hours

Rather than categories of shops and the need for a licence, all shops could be permitted to open on Sundays, but only for a limited number of hours. The States could specify the actual hours (e.g. shops may only be open between 10am and 6pm) or the States could, for example, set a maximum allowance of any four consecutive hours between 8am and 8pm. Alternatively, retailers could be given the opportunity to open, say, a maximum of 4 hours on a Sunday; freedom given to the retailer as to which hours he considers appropriate. Note that these are just examples of possible times and are not to be taken as the confirmed times.

At present, except for category E (pharmacies), shops with a licence can open all hours on a Sunday

The size of the shop

At present, certain categories of licence (B, G and M) can only be granted to small shops, defined as being those which do not exceed a floor area of 400 m² (around 1½ times the size of a tennis court). Other categories of licence have no such size restrictions, although in some cases the size of a shop

is a feature of the type of business operated. For example it is unlikely that a newsagent (category D) would ever approach 400 m² in floor area.

In the UK, small shops (defined there as not exceeding 280 m²) may open unlimited hours whilst the opening times of larger shops are restricted. Guernsey could also have a two tier approach to opening hours with larger shops being permitted to open, but with restricted hours, whilst their smaller competitors might have no such restrictions. Alternatively, the island could permit smaller shops (whatever area is considered appropriate by the States at the time and no matter what goods they sell) to open on Sundays whilst large shops would not be permitted to open at all. This type of approach would reflect an element of the States' original views, namely that convenience grocery shopping should be permitted, but not the family weekly shop.

Limiting the number of Sundays a shop can open during a year

It is often commented that retailers should be able to decide whether they wish to open on Sundays. Balancing this view with a wish to limit retailing on Sundays, the States could determine that retailers are permitted to open on, say, 26 Sundays in any year. There would be no limitations applied to other days of the week. Retailers would then be able to decide which Sundays were the most appropriate for them to open (e.g. a tourist attraction would probably wish to open during the spring/summer/autumn period but not during the winter).

Part 3: The requirements of the law and some difficulties which have arisen since the Ordinance was enacted

This part of the consultation document briefly explains the existing requirements which are set out in the Sunday Trading Ordinance, 2002 (which applies to Guernsey and Herm but not to Alderney or Sark). It also explores some of the administrative and enforcement difficulties identified over time.

More detailed information on Sunday trading in Guernsey may be viewed at www.gov.gg/sundaytrading

Summary of the main requirements of the law

The current Sunday trading regime commenced in 2003 when the Sunday Trading Ordinance, 2002 came into force.

Most shops intending to open on a Sunday require a “Sunday opening licence” issued by the parish where the shop is located. There are 13 basic categories of licence. Some shops are exempt from the need for a licence.

A licence is valid from January to December each year (or until the end of December when issued part-way through a year) and has to be renewed at the end of each year if the trader wishes to continue to trade on Sundays. An application to the parish costs £25, whether or not a licence is issued.

In addition to the 13 basic categories of licence there are also special event licences and emergency licences.

Whether or not to issue a “Sunday opening licence” is determined by the Constables and Douzaine of each individual parish, having received comments on the application from the Commerce and Employment Department [C&E]. The intention behind C&Es involvement is to help ensure uniformity, island-wide.

A trader who is aggrieved they were refused a licence has a right of appeal. This is initially to the Sunday Trading Appeals Tribunal and subsequently to the Royal Court on a point of law.

Shop workers (working in a shop open for the serving of customers) are granted certain rights under the Employment Protection (Sunday Shop Working) (Guernsey) Law, 2001, including the right not to be dismissed and not to be selected for redundancy if they opt not to work on a Sunday.

When is a licence to trade on a Sunday required – what the law says

Under the 2002 Ordinance shops carrying on a retail trade or business (including stalls, kiosks and mobile vans) need a licence to open on a Sunday unless they are open solely for one of the exempt purposes below:

- Door to door delivery of newspapers, periodicals or magazines.
- Door to door delivery of dairy products.
- Door to door delivery of heating fuels.
- The sale by fishermen of freshly caught fish (including shellfish).
- The sale at a farm, growing property, allotment or similar place, of product produced thereon.
- The sale of meals and refreshments.
- The carrying on of the business of a hairdresser or barber.
- The provision of ATMs/automated cashpoints.
- The sale of tobacco, tobacco products and smokers' requisites.
- The sale of programmes and catalogues at theatres and places of amusement.

One of the particular principles of the Sunday trading legislation is that it does not just regulate the ability of a shop to make sales on a Sunday. Under the legislation, a shop covered by the Ordinance may not be open for the "serving of customers" without a licence. Customers can be served without any sales taking place; a sales assistant talking about products, shop opening times, the potential to place orders etc. would constitute serving customers, as would the arranging or taking of test drives in the case of motor vehicles.

The difficulties with this approach

The meaning of "serving of customers" is largely not understood, and it is believed some premises on the island are opening for the serving of customers without a licence because of this misunderstanding.

Sunday opening licence categories - what the law says

The 13 categories of Sunday opening licence specified in the Ordinance brought into force the resolutions made by the States, reflecting the views at the time regarding which types of shops should be able to open and which activities should be permitted:

- **Category A – Suppliers of victuals etc. to ships and aircraft.**
- **Category B – Small convenience grocery stores.** The floor area cannot be larger than 400 m² (about 1½ times the size of a tennis court). Petrol stations located on the same site can also open under the licence.
- **Category C – Fuel outlets.** Only fuel and lubricants can be sold on a Sunday.
- **Category D – Newsagents.**
- **Category E – Authorised pharmacist.** The shop may only open for a total of 1 hour each Sunday. There is no restriction in what goods can be sold and there is no charge for an application for a category E licence.
- **Category F – beach shops.** Those near a beach or a cliff and selling food or drinks, souvenirs or items likely to be used for recreational purposes.
- **Category G – small shops within a tourist or recreational area** designated under section 28 of the Ordinance with a floor area no larger than 400 m². Areas designated under section 28 are hotels or shopping or recreational complexes of special interest to tourists or other visitors.
- **Category H – shops within a place of particular interest** designated by the Constables and Douzaine under section 29 of the Ordinance. All items offered for sale (except food and drink) must have a close thematic connection with, or be likely to be of particular interest to tourists or

other visitors to, the area designated. Areas designated under section 29 of the Ordinance are art galleries or other premises or land which are of particular educational or historic interest.

- **Category I – a shop located within airport or harbour terminal buildings.**
- **Category J – mobile shops**, selling food or drinks, souvenirs or items likely to be used for outdoor recreational activities.
- **Category K – souvenir shops (cruise ships)**, selling food or drinks; souvenirs or items likely to be used for recreational purposes near the shop. Shops must be likely to be visited by cruise ship passengers and can only open on designated cruise ship Sundays.
- **Category L – plant and garden centres** predominantly selling living plants, flowers, fruit, vegetables, seeds and bulbs. Only goods listed in an appendix to the Ordinance may be sold on a Sunday, other goods may be sold Monday to Saturday.
- **Category M – miscellaneous small shops**, selling food or drinks, souvenirs, newspapers, magazines, books or items likely to be used for a recreational activity near a beach or cliff if the shop itself is near a beach or cliff. The floor area cannot be larger than 400 m².

The difficulties with this approach

Having several different categories can cause confusion when a shop is seeking a Sunday opening licence. Also, if a trader is seeking to establish a new shop they may be particularly confused as to whether they might be justified in applying for a licence.

Some retailers find the Ordinance confusing, particularly those where the administrative base or head office is not in Guernsey. It may be difficult for traders to know whether their business is covered by the Ordinance in the first place, and then whether their shop is eligible for a licence. Some retailers (especially new applicants) do not know which category of licence to apply for. The parish has to provide this information and advice.

Predominant range of goods - what the law says

For most licence categories shops are required to have a predominant range (i.e. more than half) of goods of a certain type. The required predominant range for each category is specified in the Ordinance. As an example, the predominant range for a small convenience grocery store (category B licence) is food, drinks, cleaning materials and toiletries. The reasoning behind requiring the assessment of the predominant range of goods is that if a shop is described as being a certain type, it mostly sells goods expected of that type of shop, e.g. a shop described as a newsagent would sell mostly those items a newsagent would be expected to stock.

Two parish inspectors assess the predominant range of goods of a shop when they visit as part of the application process.

The difficulties with this approach

The concept behind this approach was to capture the essence of the type of shops which were, in practice, opening on Sundays under previous legislation. This avoided having to create an extensive and exhaustive list of goods which the States considered appropriate to be on sale on Sundays (and if an item was not on such a list it would not be able to be sold).

It was also identified that retailing is and always will be a dynamic industry with ranges of goods coming in and out of popularity over time with some businesses broadening the range of goods on offer.

For many licence categories, parish inspectors are required to determine whether the predominant range of goods of the shop meets the criteria. What the predominant range of a shop is, and whether certain goods fit the criteria can be interpreted in different ways by different parish inspectors. This can lead to confusion amongst traders and difficulties if traders have premises in different parishes.

There are a number of inconsistencies that have arisen out of the system, especially in cases where several of the categories of licence allow any goods to be sold so long as the predominant range of goods meets the criteria. For example, small convenience grocery stores and garden centres can open and, in addition to their predominant range, can sell pet food or toys for animals. But there is no category which enables a dedicated pet shop to open. This may be seen to be unfair.

Plant and Garden Centres – what the law says

Category L applications are dealt with in a slightly different manner than other categories. The shop must have a predominant range of living plants, flowers, fruit, vegetables, seeds and bulbs and as with other categories this assessment is based upon the range of goods in the shop during the week, Monday to Friday. Additionally, and critically, only goods listed in an appendix to the Ordinance may be sold on a Sunday, whilst other goods not listed may only be sold Monday to Saturday.

Furthermore there is a restriction on the floor area which may be devoted to the sale of certain goods on Sundays. These goods are termed “giftware” in the Ordinance and include candles, picnic-ware, cards, calendars, arts and craft products and Christmas decorations and wrapping paper.

This approach moves away from the principle with most other categories that once a shop is granted a licence it may sell any other types of goods providing the predominant range of goods continues to meet the criteria. It came about because of concerns that plant and garden centres could develop into out of town retail centres and lead to an unwanted demise of the High Street and other similar retail areas.

The difficulties with this approach

It was originally identified that whilst the traditional style of plant centre (one predominantly selling plants, seeds or bulbs) still existed there was a move, especially outside the island, towards garden centres offering a much broader range of goods. Recognising that these developments could migrate to Guernsey the then Board of Industry consequently had great difficulty in setting out the criteria for plant and garden centres.

Over recent years these type of businesses have continued to broaden their scope and the focus of serving the direct needs of the gardener (e.g. selling plants, seeds, bulbs, fertiliser, gardening tools etc.) has developed into offering a wider range of goods, typically including books, giftware, household wares, furniture and fashion-orientated clothing. A café facility may be provided; gardening orientated goods on sale almost occupying a second stage to the main event.

Garden retail centres in particular will typically change their main focus of business throughout the year, especially around Christmastime when a broad range of festive decorations (often for indoor use) may fill the shelves. A special dispensation, permitting an increased area for the sale of Christmas decorations and wrapping paper, is given to category L licence holders during the months of November, December and January to facilitate a change in focus. A significant change in the goods on offer can present particular difficulties for the parish inspectors seeking to judge the predominant range of goods in the shop, especially when inspecting around December-time, a time when licences are being sought for the following year.

Cruise liner Sundays – what the law says

Category K (souvenir shops (cruise ships)) allows certain shops to open on those Sundays which are declared as cruise liner Sundays by the Commerce and Employment Department’s Visit Guernsey section. The types of shops which can open with a category K licence are those which can be expected to be visited by cruise liner tourists or other visitors.

The difficulties with this approach

The current criteria have been felt by some as not being flexible enough to allow new initiatives aimed at supporting tourism and recreation.

Process for granting Sunday opening licences (categories A to M) - What the law says

Applications are submitted to the parish where the shop is located. Applications must be submitted at least 28 days before the licence is needed. Except for applications for an authorised pharmacist (category E), there is a fee of £25 per application.

Once an application is received by a parish, the shop is visited by two inspectors from that parish to determine whether they consider the shop meets the criteria to be granted a licence.

Parishes send completed application forms and inspectors' reports to the Commerce and Employment Department (C&E) where officers review the documentation and provide a comment to the parishes on any category A to M application. This helps ensure consistency of decision-making across all parishes.

The decision as to whether or not to grant a licence is taken by the Douzaine and Constables of a parish based on the inspectors' report and the comments provided by C&E.

The difficulties with this approach

This scheme is very reliant upon the assessment undertaken by the two parish inspectors. Whilst it can be safely assumed that they undertake their roles with due diligence, in some cases the Constable is only in post for two years and their knowledge and skill may be lost to the parish or may not be transferred to their successor. Additionally several parishes have few shops requiring licences and so deal with Sunday trading matters infrequently. It is therefore understandable that these parishes have only a limited detailed knowledge of the legislation and problems frequently arise with the renewal process at the end of each year, and also on some occasions when new licences are sought part way through a year.

As a consequence some traders can find it difficult to obtain consistent advice from some parishes, especially where they have similar shops in different parishes.

There is a significant amount of administrative work required on the part of the parishes and C&E to deal with the legislation.

While C&E has a role to ensure consistency it does not have any powers under the Ordinance to check whether individual parishes are carrying out their role appropriately, including whether inspections of shops are being carried out correctly and whether premises, once issued with a licence, are being monitored to ensure they remain within the law.

The legislation (and associated guidance) is readily accessible to parishes, traders and the public at large. But there are a number of subtle details that can be missed or misunderstood. C&E staff are often able to advise on these, but as the Department's role in the process comes fairly late difficulties do arise, especially if licences are required for set dates e.g. exhibitions.

The current legislation has no separate provision for renewals of licences so shops have to apply for a completely new licence each year. This procedure was established to ensure that every business had to receive at least one inspection a year with an associated assessment that it met the criteria for that category of licence. Practically, many parishes treat repeat applications as renewals and will make use of the previous years' information when considering the new application. Some will take a copy of the previous years' inspection report along and simply consider whether anything has changed. If no change can be seen, the exact same wording will be entered on the new form. There are a significant number of businesses who have been issued licences for a number of years and where there has been no change to their predominant range of goods or floor area. If there was a

shorter renewal process available to these businesses it would cut down on work for parishes and C&E and reduce inconvenience to the businesses.

Special event licences and Emergency Licences – what the law says

Special event licences are for individual “one-off” types of events, and are not for shops which wish to open regularly on a Sunday. These licences are valid only for the date(s) specified on the licence. If an event is repeated in subsequent months or years, a new special event licence will be required. A £25 fee must be paid in some cases, although charitable and similar events are exempt from fees.

Licences may only be issued for events which are promoted as being held to raise money for a charity or other qualifying organisations or to celebrate or commemorate an event or occasion of historic or cultural significance e.g. Liberation Day if it falls on a Sunday.

The Ordinance also allows for the issuing of Emergency Licences in certain circumstances such as a major storm, mass flooding, extended power cuts etc. No emergency Sunday opening licences have ever been issued.

Appeals & Tribunals – what the law says

Appeals can only be made against certain decisions and can only be made by someone who has a specific connection with the decision made, e.g. the applicant. Members of the public would not normally have a right of appeal against a decision.

All appeals are heard in the first instance by a Sunday Trading Appeals Tribunal. The tribunal can either decide to dismiss the appeal or to uphold the appeal and quash the decision being appealed against. If any party is unhappy with the outcome of a tribunal hearing based on a point of law there is a further right of appeal. A person found against by the tribunal cannot appeal to the Royal Court simply because they do not agree with the decision of the tribunal.

The difficulties with this approach

The Sunday Trading Appeals Panel is comprised of local members of the community, but they are not experts in, or familiar with, the intricacies of Sunday trading legislation. With only two appeals since the inception of the Ordinance, such expertise is unlikely ever to be gained from appeal hearings. On the other hand, staff at C&E have built up such knowledge and expertise but there is no legal requirement for the panel to consult any expert witnesses in the process of reaching their judgment.

There is also no process for Commerce and Employment to appeal any decision of the tribunal.

The cost of defending an appeal could become significant and a parish may not have sufficient funds available for this purpose. It is also considered unfair that one parish may be burdened with the cost of defending an appeal on a point of law which affects many or all parishes.

Enforcement & Monitoring – what the law says

Enforcement of the legislation ultimately rests with the Police, but parish officials monitor compliance and report apparent infringements to the Police.

Parishes have a responsibility to monitor traders and business premises within their parish to determine whether any enforcement action might be needed.

A parish may revoke or suspend a licence if there is a breach of the Ordinance.

Protection rights for employees – what the law says

Under Part IIA (Protection for Sunday Shop Workers) of the Employment Protection (Guernsey) Law, 1998*, shop workers (working in a shop which is open for the serving of customers) have the right:

- not to be dismissed
- not to be selected for redundancy
- not to suffer any other detriment for refusing, or proposing to refuse, to do work in or about a shop on a Sunday.

These rights apply irrespective of age, length of service or hours of work. However, they do not apply to those employed to work only on Sundays.

* Part IIA was inserted in the 1998 Law by the Employment Protection (Sunday Shop Working) (Guernsey) Law, 2001.

Part 4 – the Questionnaire

Thank you for reading this information, please now complete the questionnaire online at <https://www.surveymonkey.com/s/sundaytradingconsultation>.

Or by filling in the pages that follow by hand.

Part 4 Questionnaire

Section A: Preliminary Questions

1. Do you normally reside in or have business interests based in Guernsey?

Yes ☐

No ☐

2. Please tick which of the following you are responding as, or on behalf of.

Please tick only one:

☐ Member of the public

☐ Retail business

☐ Retail employee

☐ Parish official

☐ Other (please specify) _____

3. Please tick the box of the option you most agree with (tick only one box):

☐ i. the existing system should be kept as is, with amendments if necessary;

☐ ii. any shop should be allowed to open on any Sunday;

☐ iii. no shop should be allowed to open on any Sunday.

4. If you chose option i) for the above question (Q3), what, if any, amendments do you feel would be useful? (Please also see the following questions as these may cover some of your points.)

If you chose option ii) or iii) in question 3, you may feel the rest of this survey is not relevant. However, it may be that the States will decide Sunday trading should remain regulated, therefore we would still welcome your opinions regarding the remaining questions.

Section B: How Sunday trading is regulated

5. Which, if any, of the following do you believe should be a factor in how Sunday trading is regulated?

Tick all options which you believe should be a factor:

- ☐ The goods sold (the current system)
- ☐ Relaxing the law at certain times of the year (e.g. the run up to Christmas or during the summer)
- ☐ The location of the shop (e.g. special arrangements for shops in the town or tourist attractions)
- ☐ Restricting the opening hours (e.g. any 4 hours between 8am and 8pm)
- ☐ The size of the shop
- ☐ Limiting the number of Sundays a shop can open during the year
- ☐ Other (please specify)

[illegible]

Section C Consumer Questions

This section must be completed from the perspective of a consumer. If you are completing this questionnaire as a retailer, you may consider the following three questions not to be applicable.

6. **How likely would you be to do more of your shopping on Sundays if more shops were open?**
- ☐ Very likely
 - ☐ Likely
 - ☐ Undecided/not applicable
 - ☐ Unlikely
 - ☐ Very unlikely
7. **Would you prefer shops to open later during the week rather than on Sundays?**
- ☐ Yes
 - ☐ No
 - ☐ Undecided/not applicable
8. **How likely would you be to shop less on the internet if more local shops were open on a Sunday?**
- ☐ Very likely
 - ☐ Likely
 - ☐ Undecided/not applicable
 - ☐ Unlikely
 - ☐ Very unlikely

Please go to section E

Section D: Retailer Questions

Please only answer these questions if you are completing the survey as a retailer.

9. Please indicate what type of retail business you are responding on behalf of:

10. Would you like to be able to open on a Sunday?

- ☐ Yes
- ☐ No
- ☐ Undecided

11. If there was total deregulation of Sunday trading (i.e. full commercial freedom), do you believe this would lead to economic benefit for your business?

- ☐ Yes
- ☐ No
- ☐ Undecided

12. Would you prefer to open your shop later during the week rather than on a Sunday?

- ☐ Yes
- ☐ No
- ☐ Undecided

Please go to section E

Section E: Other Questions about Sunday Trading

13. Do you consider that garden retail centres, offering a range of goods beyond those directly associated with gardening should be permitted to open on Sundays?
- ☐ Yes
- ☐ No
- ☐ Undecided
14. When a cruise liner is visiting the island on a Sunday, do you believe that a greater range of shops should be allowed to open than on other Sundays?
- ☐ Yes
- ☐ No
- ☐ Undecided
15. If so, do you believe that such arrangements should apply just to shops in St Peter Port?
- ☐ Yes
- ☐ No
- ☐ Undecided
16. Who do you believe should make the final decision to allow an individual shop to open on Sundays (either by granting a licence or through whatever other mechanism may be decided by the States)?
- ☐ The parish where the business is located
- ☐ A Department of the States
- ☐ Other (please specify) _____
17. Do you believe that the same rules on Sunday trading should apply in all parishes?
- ☐ Yes
- ☐ No
- ☐ Undecided

Section F: Any Other Comments

18. Do you have any other comments you wish to make about Sunday trading?

PLEASE SEND COMMENTS TO

Sunday Trading Consultation
Commerce and Employment Department
FREEPOST GU245
Guernsey
GY1 5SS

Telephone: (01481) 234567
Email: ts@commerce.gov.gg
Fax: (01481) 235015

Disclaimer*

Please note that consultation responses may be made public (sent to other interested parties on request, quoted in a published report, reported in the media, published on www.gov.gg, listed on a consultation summary etc.)

*Please indicate how the Department should treat your response, the options available include:

- ☐ I agree that my comments may be made public and attributed to me
- ☐ I agree that my comments may be made public but not attributed (i.e. anonymous)
- ☐ I don't want my comments made public

Name:	
Address:	

Supply of Name and address is optional