

FDf Scotland Response to Transport Scotland Consultation on WPL

Question 2: Should the regulations specify a list of statutory consultees that local authorities are required to consult?

Yes.

All businesses within the proposed WPL “zone” should be notified of the consultation and given the opportunity to respond.

Question 3: When local authorities communicate information about new, amended, or revoked WPL schemes, what information should the notices contain?

The following would help businesses where a WPL is to be implemented:

- Information about alternative modes of transport for staff to be able to commute to work
- clear reasoning for the scheme being implemented,
- implementation period,
- contact details for WPL lead in the local authority,
- penalties/enforcement
- businesses support for implementation.

Question 4: When local authorities communicate information about new, amended, or revoked WPL schemes, where/how should notices be published?

Businesses need to be informed as early as possible. The Local Authority should contact all business rates payers to inform them of planned schemes, preferably at the consultation stage.

Question 6: Should the rationale and process for a local authority’s review of licensing decisions be wholly set out by the local authority?

Yes.

There needs to be a clear and transparent reasoning available to businesses to understand the rationale behind implementing a workplace parking levy in a particular area. The FDF members understand the pressures on parking in city centres and towns that are well served by public transport as well as the environmental impact. The FDF will publish a net-zero route map later this year which will look at how food and drink manufacturers can reduce their emissions including scope 2 and 3 emissions. Food and Drink manufacturers remain concerned about potential to implement WPLs in industrial areas where public transport is very limited or non-existent, a clear consultation process and rationale is vital for the WPL not to become just another tax on food and drink manufacturers.

Question 7: What circumstances/rationale do you consider reasonable for review or appeal of licensing decisions to take place?

Examples could include:

- **Lack of credible public transport options** available to access a particular business including at certain times of day/night.
- **Safety** Where a business has safety concerns about employees commuting to/from work
- **Environmental impact** To query the perceived environmental benefits set out by WPLs
- **Car parks that account for shift patterns:** Large manufacturing sites need to provide for shift changeover patterns. Therefore, at any one time, they may have a higher number of car parking spaces than the number of cars that will actually be parked during a shift.

Question F: What positive or negative impacts do you think the WPL proposals outlined within this consultation may have on:

- particular groups of people, with particular reference to ‘protected characteristics’ listed above
- people facing socioeconomic disadvantages
- people living in island communities

The FDF members are opposed to passing on any WPL costs to employees as a levy of £400 per year passed down to an employee could increase the average weekly transport cost for an individual by more than 11%. (Scottish Government cites ONS data for average spend on transport as £68.20)

Question 13: Do you think the WPL proposals outlined within this consultation are likely to increase, reduce or maintain the costs and burdens placed on business sectors? Please be as specific as possible in your reasoning.

If WPLs are implemented in areas where food and drink manufacturers are located it will be yet another financial burden on food and drink producers who are continuing to count the ever-rising costs from Brexit and covid-19. The WPL will most likely divert money from other investment in jobs/productivity: One of our members calculated implementation of the WPL could reduce their operating profit by more than 5% at a time when they are already under huge financial pressure.

Our members are opposed to passing on the cost of WPL to their employees as it could take the people on the lowest pay grades below the National Living Wage, which would make it an illegal deduction (even if it was deducted from their net pay).

Question 16: Do you think the WPL proposals outlined in this consultation are like to have an impact on the environment? If so, in what way? Please be as specific as possible in your reasoning.

No. We do not believe the workplace parking levy will enable a move from using private cars to public transport. We represent food and drink manufacturers across Scotland, including members on the Isle of Arran, Fochabers, Glenbervie, Banff, amongst many other rural locations. In these locations, there is little or no public transport available for production staff to travel to work.

Many staff already car share with colleagues to commute thus reducing the number of cars travelling to food and drink production sites across Scotland.

Most food and drink manufacturers operate 24/7 including night shifts and weekends. In most local authority areas, there is no public transport available after 11.30pm or before 7am and even less at the weekends. Manufacturers are located on industrial estates, mostly not located near housing. Due to limited public transport networks one member, located in the central belt stated that over 90% of their employees drive to work (with car sharing being very common pre-pandemic). Their production colleagues travel from neighbouring towns, where there are no practical public transport options.

Question 17: Do you have any other comments that you would like to add on the Scottish Government's WPL proposals outlined within this consultation?

Our recommendation would be that WPLs should not be introduced until a comprehensive transport network solution is in place. Additionally, the policy was introduced in pre-pandemic times and as such should be reviewed. Research suggests many people will not be returning to workplaces full time in Scotland and as such the need to implement WPLs across Scotland should be carefully considered.

It is likely that our food and drink producers will subsidise public transport links for other town/city centre located businesses and organisations. We believe it would make little difference to vehicle movements associated with our members operations due to:

- limited public transport from major population hubs,
- 24hr operations and multiple shift patterns making public transport more challenging
- For food production staff, working from home is, of course, not possible.

Greener Car spaces We suggest exemptions for WPL could be explored for parking spaces that are for car sharing also known as High Occupancy Vehicles as in the food and drink production sector, many people commute together and car share. Electrical vehicle charge spaces should also not be subject to WPL.

Transparency and accountability of investment and forward planning: We agree that, if a workplace levy is implemented, all funds raised must be ring-fenced for investment in transport schemes outlined in the council's transport plans. People and employers must directly benefit from the levy they are paying.

Working with owners of car parks to ease transition: if a levy is introduced, grants should be made available for sustainable travel initiatives for employees.

About us:

Food and Drink Federation (FDF) Scotland represents the food and drink manufacturing industry in Scotland. We are Scotland's largest manufacturing sector, accounting for 31 per cent of total manufacturing turnover¹. Our gross value added to the economy is £3.9 billion, representing 32 per cent of Scottish manufacturing value added². We have 1,385 food and drink manufacturing businesses, employing 47,000 people, which represents 26 per cent of

¹ Source: Scottish Annual Business Statistics.

² Source: Scottish Annual Business Statistics.

the Scottish manufacturing workforce³. In 2018, manufactured food and drink exports from Scotland increased by 8 per cent to £7.0billion⁴.

The following Associations actively work with the Food and Drink Federation:

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| ABIM | Association of Bakery Ingredient Manufacturers |
| BCA | British Coffee Association |
| BCUK | Breakfast Cereals UK |
| BOBMA | British Oats and Barley Millers Association |
| BSIA | British Starch Industry Association |
| BSNA | British Specialist Nutrition Association |
| CIMA | Cereal Ingredient Manufacturers' Association |
| EMMA | European Malt Product Manufacturers' Association |
| FCPPA | Frozen and Chilled Potato Processors Association |
| FOB | Federation of Bakers |
| GFIA | Gluten Free Industry Association |
| PPA | Potato Processors Association |
| SA | Salt Association |
| SNACMA | Snack, Nut and Crisp Manufacturers' Association |
| SSA | Seasoning and Spice Association |
| UKAPY | UK Association of Producers of Yeast |
| UKTIA | United Kingdom Tea & Infusions Association Ltd |

FDF also delivers specialist sector groups for members:

Biscuit, Cake, Chocolate and Confectionery Group (BCCC)
Frozen Food Group
Ice Cream Committee
Meat Group
Organic Group
Seafood Industry Alliance

³ Source: Scottish Annual Business Statistics.

⁴ Source: Exports Statistics Scotland. Figures include tobacco manufacturing.