

October 20, 2021

Mr. Pedro Eastmond
Clerk of Parliament
Parliament of Barbados
Trafalgar Street
Bridgetown
St. Michael

Dear Mr. Eastmond,

Re: Comments on National Vending Bill, 2021

The Barbados Chamber of Commerce and Industry (BCCI) wishes to thank the Barbados Parliament for sharing the correspondence dated October 1, 2021, regarding the National Vending Bill, 2021. The Chamber received this correspondence on Tuesday, October 12, 2021, and as such, required additional time to provide comments on the Bill. Given the importance of this Bill and the need for a careful review of same, the BCCI contacted the Parliament office to request an extension to the submission deadline date of Friday, October 15, 2021, and was informed that the Chamber could submit its written feedback on Wednesday, October 20, 2021.

The BCCI through its Retail and Distribution Committee, evaluated the National Vending Bill, 2021 and the below comments are shared for your consideration:

1. **Concern:** The Bill appears not to include an audit process for the allocation and monitoring of spots in Vending Zones. The Bill should also include provision for the monitoring of compliance once spots are allocated. Additionally, the Bill should clearly state how zones will be allocated whether based on a particular size per spot, type of products to be sold by the vendor or necessary facilities onsite at each location etc.
2. **Concern:** The Bill does not state the required size and dimensions of vending kiosks or stalls. Clarity is needed on whether vendors are allowed to have stalls of varying sizes.
3. **Concern:** Clarity is needed regarding the type of zones (clothing, vegetables, poultry and fish, etc.) to be established.
4. **Concern:** The Bill should highlight whether vendors are required to stay in the assigned spots at specified Vending Zones.
5. **Concern:** Vending Zones should be marked and numbered; this information should also be recorded on each vendor's license.



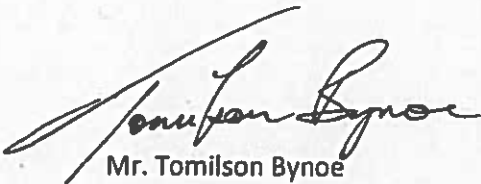
6. **Concern:** Clarity is needed regarding waste collection and disposal. The Bill should clearly state if vendors are required to remove all garbage produced by their stall or whether there would be a central waste collection and disposal facility at each Vending Zone.
7. **Recommendation:** There is need for clear guidelines, rules and a code of conduct that will govern vendors. Also, the Bill should clearly list what is considered as an infraction to the vending guidelines.
8. **Recommendation:** The Bill does not allow for a representative of the BCCI or any other commercial representatives to sit on the Tribunal. To ensure fair and adequate representation, the Bill should be amended to allow for such commercial representatives to be members of the Tribunal.
9. **Comment:** The Bill should clarify whether vending stalls or zones can be established in conflicting areas (e.g., can vendors be assigned to spots in close vicinity of store front competitors).

The BCCI takes this opportunity to thank the Government and Parliament of Barbados for affording the Chamber the opportunity to provide comments on the draft legislation.

We also take this time to highlight the importance of continued dialogue surrounding the Bill as such legislation has several implications for varying groups of society. In this regard, the Chamber looks forward to future opportunities to advance discuss on the legislation.

Yours respectfully,

BARBADOS CHAMBER OF COMMERCE & INDUSTRY



Mr. Tomilson Bynoe

Chair, BCCI Retail and Distribution Committee