

Hi Kevin

Thank you for contacting Asda seeking further guidance on how we operate Click & Collect Remote Lockers, and our contention that they should be exempt from proposals to prohibit the sale of alcohol from 'vending machines'. We very much appreciate the Committee taking time to consider this issue thoroughly.

As a committed responsible retailer of alcohol, Asda follows a process which we believe takes all reasonable practicable steps to ensure the sale of beers, wines and spirits from our Remote Lockers is not abused. I should add that Asda currently does not have Remote Lockers in Northern Ireland, but nevertheless this is worthy of consideration to future proof the proposed changes to the legislation.

The following is the Asda validation process for online sales which are delivered to the customer via Remote Lockers:

- When setting up an account with Asda.com, customers must register their credit card and are prompted to enter a date of birth when they set up their account;
- We ask the user to tick a box to confirm they are 18 before they can shop ;
- In order to prevent under 18's registering, we do not accept Visa Electron, which is the only type of card an under 18 can obtain;
- When a customer has placed an online order for collection at a locker and has age sensitive products in the basket, they are asked to enter their date of birth as part of the checkout process;
- We also ask for the CVV code each time a customer checks out to maintain this age/card verification check;
- An encrypted DOB is sent to the locker as part of the pre-advice which validates the order numbers that need to be placed in the lockers;
- When a customer arrives and enters their order number on the Remote Locker panel, they are prompted again to enter their DOB – this is the DOB they entered when they checked out;
- If the customer enters their DOB wrong 3 times the order is locked;
- The only way the order can then be accessed is by an Asda colleague using a super user card and doing a face to face age verification.

We also note that the proposed amendment, specifically Clause 11(2), is aimed at the Prohibition on self-service and sales by **vending machines**. We believe there is a clear differentiation between our controlled use of Remote Lockers, and Vending Machines which by definition are instant, with the customer making an unsupervised purchase on impulse. In these circumstances, unlike Remote Lockers, there is no control whatsoever over who can use them as they are, by their lack of controls, able to be used by anyone passing by. We can understand how with vending machines there are clearly issues around age verification for alcohol sales and such a system could be abused by any individual.

By contrast, our Remote Lockers are not instant purchase and have a number of safeguarding checks in place over who can use them (as listed above) including age verification at account setup, card CVV check on each purchase, DOB encryption sent to the lockers when age restricted items are ordered, plus they will always take place at a different time to the purchase. On collection we ask the customer to enter the DOB which must match the DOB in the system –all in contrast to vending machines. Additionally all **Asda** sites where lockers are present are covered by CCTV which is an additional assurance.

While we accept that it would be theoretically possible to 'cheat' the Remote Locker system, it is nowhere near as easy as putting money in a vending machine. It would instead take an amount of pre-planning and calculated action by an individual to gain access to the lockers in order to get alcohol and unfortunately there are many easier ways to obtain alcohol non-legitimately. Retailers such as Asda cannot be held responsible for the actions of individuals hell bent on cheating the system given the steps that we carry out to establish age and transaction security. Instead we believe our Remote Lockers are there as a convenient way for our legitimate customers to pick up their shopping. We have all reasonable checks in place and believe they are physically and procedurally different to vending machines – hence our request that they are exempted from the clause seeking to prohibit sale of alcohol from 'vending machines'.

I hope this is helpful.

Best regards

Joe

**Joe McDonald**

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