

**Testimony on Section 3 of H.942 – Unit Pricing Requirements  
Submitted by Maggie Lenz  
On behalf of Vermont Retail & Grocers Association (VRGA)**

Chair Ingalls and Members of the Committee,

Section 3 of H.942 proposes to require retailers to display both total price and unit price for most consumer commodities sold in-store, along with standardized requirements for shelf tag formatting, placement, and price visibility at checkout.

VRGA members support clear and transparent pricing for consumers. However, convenience stores should not be included in this requirement. Convenience stores are not designed for comparison shopping in the way traditional grocery stores are. Their model is based on speed, limited selection, and immediate access. Unit pricing does not provide meaningful value in that context, but it would create significant operational burden.

For convenience stores, implementation would be particularly challenging. These businesses operate with limited staff and high product turnover that make standardized shelf tagging more difficult. The cost of updating systems, re-tagging inventory, and maintaining ongoing compliance as products and promotions change would be substantial. These are not one-time costs. They would require continuous staff time and oversight in a retail format that is not structured to absorb that level of administrative work..

VRGA supports a clear exemption for convenience stores. We understand that square footage has not been a preferred approach for defining carve-outs. As an alternative, we propose using an industry-standard definition of “convenience stores” based on the North American Industry Classification System and exempting those establishments from this provision.

We are also open to working with the Agency of Agriculture and the Senate Committee on Agriculture on other clear and administrable frameworks to define appropriate exemptions.

Thank you,

Maggie Lenz