



Re: Self-Checkout Legislation - Senate Bill 2342

Date: 03/24/2026

To the Honorable Members of the Rhode Island General Assembly:

I respectfully submit this letter on behalf of Shaw's and Star Market to articulate our concerns regarding Senate Bill 2342, which seeks to impose restrictions on the implementation and use of self-checkout (SCO) systems within retail establishments. As stakeholders deeply invested in the well-being of Rhode Island's communities and economy, we believe the enactment of this legislation would inflict considerable operational and financial difficulties, meriting your thoughtful reconsideration.

#### Industry Perspective: Legislative Precedent and Autonomy of Private Enterprises

Senate Bill 2342 constitutes a disquieting legislative precedent, as it enables government intervention in determining how, when, and where private businesses deploy their personnel. The compulsory scheduling of additional cashiers, irrespective of actual business necessities, undermines the flexibility required to address evolving consumer demands and fluctuating market conditions. Such regulation threatens to suppress innovation and efficiency, which are indispensable for the continued competitiveness of the retail sector.

#### Operational Challenges: Mandated Staffing Absent Business Justification

The stipulation to increase cashier staffing—regardless of current customer traffic or transaction volume—would present significant hardships for grocery retailers. This requirement disregards the practical realities of store operations and could result in unnecessary labor expenditures, thereby jeopardizing the sustainability of businesses. The obligation to retain excess staff without demonstrable need is inefficient and untenable from a business perspective.

#### Checkout Data: Utilization of SCO, E-Commerce, and Staffed Registers

Presently, data indicates that between 60% and 65% of our transactions are processed via self-checkout (SCO) systems, with an additional 10% or more through digital unattended grocery E-Commerce, primarily our Drive-Up and Go platforms. Only approximately 25% of customers utilize traditional staffed registers. This distribution highlights the importance of maintaining adaptive service models to accommodate a broad spectrum of consumer preferences, thereby enhancing the overall shopping experience and most importantly convenience. The capacity to calibrate staffing and checkout modalities in response to these trends is paramount for operational efficiency.

#### Staffing Implications: No Reduction in Headcount, Increased Support Staffing

Contrary to the premise that SCO implementation diminishes employment, headcount has not been reduced as a result of self-checkout adoption. In fact, staffing has increased with the introduction of E-Commerce platforms, as labor resources have shifted to support essential activities such as fulfilling shopping orders and facilitating deliveries to customers' vehicles. This reallocation of labor underscores the synergistic relationship between technological advancement and workforce expansion within the grocery sector.

#### Conclusion: Request for Reconsideration

In light of the aforementioned concerns, I respectfully urge the Rhode Island General Assembly to reconsider Senate Bill 2342 and its far-reaching implications for grocery retailers and their personnel. Shaw's and Star Market remain steadfast in its commitment to serving Rhode Island's communities and fostering economic vitality, and we look forward to continued collaboration toward policies that encourage innovation and responsible growth.

Thank you for your attention to this matter of significant importance.

Sincerely,

A handwritten signature in black ink, appearing to read "Jim O'Leary".

Jim O'Leary  
Vice President of Retail Operations, Shaw's and Star Market

CC: Scott Bromberg, President & CEO, RI Food Dealers Association