



14 June 2013

Pubs Consultation  
Consumer and Competition Policy  
Department for Business, Innovation and Skills  
3<sup>rd</sup> Floor, Orchard 2  
1 Victoria Street,  
Westminster  
London SW1H 0ET

By email only: [pubs.consultation@bis.gsi.gov.uk](mailto:pubs.consultation@bis.gsi.gov.uk) (2 pages in total)

Dear Sirs,

**Pub Companies and Tenants: A government consultation  
April 2013**

Introduction

I am writing to you on behalf of Young & Co.'s Brewery, P.L.C. in response to the consultation.

Young's

We are a long-established business that has operated in Wandsworth, South West London for over 180 years. 75 of our pubs are tenanted operations, mainly located in London and the South East; they are operated by third parties (a mix of individuals and companies) who rent them from us and buy drink from us, but otherwise generally run the pubs for their own account. The vast majority of them are run on a traditional basis; that is to say, a tied non-assignable tenancy up to five years in length. The tie is a partial drinks tie.

Industry responses

We are members of both the Independent Family Brewers of Britain (IFBB) and the British Beer and Pub Association (BBPA). As such, we have seen their detailed responses to the consultation - we are supportive of them. We have not attached copies of the responses as we understand that others will be sending them to you directly. If you would like us to provide copies though, please let us know.

Self-regulation

From our perspective, further regulation of our relationships with our tenants would be disappointing. Our tenancy agreements already address the perceived industry issues. Further, we operate a legally binding BIIBAS-accredited code which is currently being updated to meet the latest requirements of the UK pub industry framework code of practice on how tied agreements should operate in the pub trade; this is expected to be accredited later this year.

We believe that others have also made a self-regulatory regime work and that they will be writing to you separately.

Conclusion

We believe that self-regulation is working both for us and our tenants and we therefore strongly oppose the idea of a Statutory Code being imposed.

If it was nevertheless still decided to proceed with a Statutory Code, we would support a threshold, below which such a code wouldn't be binding, of 500 tenanted and leased pubs (ie all managed houses would be excluded).

Yours faithfully  
for and on behalf of  
Young & Co.'s Brewery, P.L.C.

S.F. Goodyear  
**Chief Executive**