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14th June 2013

Dear Sirs

**RE : PUB COMPANIES AND TENANTS - A GOVERNMENT CONSULTATION**  
**Consultation beginning 22/04/2013, closing 14/06/2013**

Please find enclosed a further submission on the subject of Flow Monitoring. As you are aware, flow monitoring has been and still is a contentious topic within the industry.

Little has been achieved to resolve the differences of opinion on accuracy of Vianet's (formally Brulines) equipment installed in some 20,000 Public Houses to monitor tie compliance.

I have been working closely with [redacted] and they will be making a further submission related to Vianet (Brulines) and are awaiting further evidence for inclusion.

I hope that this document will assist you in your deliberations on a course of action for Flow Monitoring equipment.

Yours faithfully

### **Submission to BIS on Brulines**

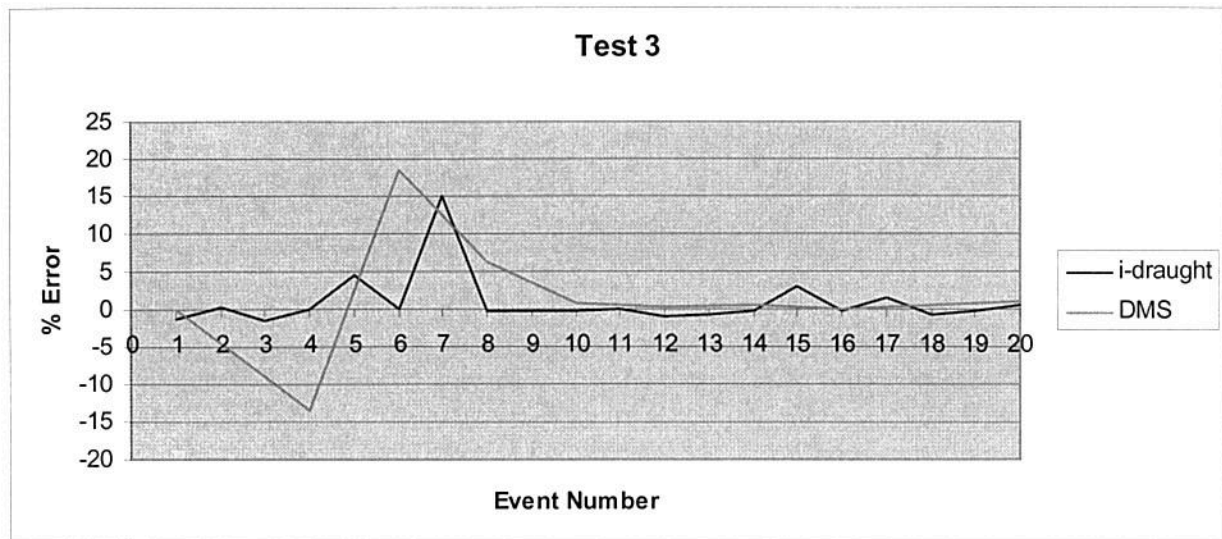
1. I am a \_\_\_\_\_ with many years experience in the design and operation of measurement systems. I have concerns in the use of the Brulines flow monitoring system by the pub companies and the potential for wrongful accusation of buying out of tie due to serious flaws in the system.
2. The committees recommendation in the follow up report 4<sup>th</sup> March 2010 was

***'that the Government, through the National Measurement Office, urgently clarifies the position of beer flow monitoring equipment in relation to the Weights and Measures Act 1985. Such equipment must be included under the Act for calibration and verification purposes.'***

The Governments response was:

***'Government is clear that the industry should voluntarily ensure that all such measuring equipment is calibrated by the National Measurements Office. However should the industry fail to do so within a reasonable time frame this will result in Government prescribing the equipment to ensure fairness.'***

3. In response to this, Brulines commissioned the National Measurement Office (NMO) to undertake tests on the i-draught and DMS versions of their flow monitoring equipment. These Brulines designed and commissioned tests, conducted at Brulines own facility, were not the voluntary calibration the Government was requesting.
4. The results of these tests were published by the NMO without any conclusions by the NMO. The results were analysed by Brulines and their own conclusions were published in their 'Comprehensive Guide To Flow Monitoring'. Brulines concluded in their analysis that the equipment is fit for purpose.
5. The NMO would not comment.
6. Brulines use a very simple method of calculating the error for each test. They sum the errors giving equal weight to each point. In this method a large negative error will be canceled by an equally large positive error giving a false impression of accuracy.
7. To give an example of this, the NMO Test 3, Brulines give the error for this test as -0.71% for both the i-draught and DMS systems. As can be seen from the graph of the percentage error the DMS system saw huge positive and negative errors.



The fact that these cancel each other may be coincidental, further testing should be done to confirm that a large negative is always cancelled out with a large positive as Brulines suggest is the case.

8.

9. The systems do not cope well with every day dispense occurrences, such as barrels running out, entrained gas and dispense from multiple fonts. It cannot even tell the direction of flow. Heavy reliance is placed by Brulines on their 'robust manual auditing' to rectify the failings of the systems. To date there has been no independent testing to support that this robust auditing process will recognise and correct the problems encountered in the NMO tests or its use in the field.
10. The NMO report of test results and Brulines own conclusions are the only evidence to support claims of accuracy and suitability for the purpose of monitoring tie compliance.
11. There are many reports of tests carried out by eminently qualified persons from companies such as TUVNEL, SGS and Trading Standards that conclude the system has many inherent flaws that lead to inaccuracies that are not acceptable for the purpose of monitoring tie compliance and the calculation of fines directly from the data.
12. It is clear that the industry has failed to comply within a reasonable time frame and the Government should prescribe the systems and subject them to defined accuracy criteria for fluid measurement systems and insist on their removal until such time they comply.