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From:
Sent: 13 June 2013 22:21
To: Pubs Consultation Responses
Subject: Question of PUBCO reform - submissions requested

Dept. of Business Innovation and Skills
 3rd Floor, Orchard 2
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 Westminster
 London
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Minister:

As a consumer, I'm suggesting NO ADDITIONAL REGULATION.

On the basis of reports of low income of certain publicans, CAMRA is arguing for more regulation in the pub industry.

As the government sector expands, wealth is removed from the private sector. Lower pay, fewer full-time jobs and higher unemployment will be a part of it. New, additional regulation that costs businesses more money just aggravates the condition. The only way private sector salaries can increase in weak economies such as we've experienced is if governments take a smaller portion of the pie. Publicans don't have a right to higher salaries, or the right to a salary at all, for that matter, any more than the rest of us. Nor do they deserve regulation to augment their salaries.

The projected cost of BIS' "powerful" new regulator will be a powerful 900k-1.2M a year, according to your report. This incremental cost will fall upon the PUBCOs and the consumers will end up footing the bill. At the same time, further pub closures are to be expected since you've just raised the cost curve for the PUBCOs: Bye, bye marginal pubs.

Taxpayers will likely also bear part of the added regulatory cost, somehow. They always do.

CAMRA/BIS proposes taking money away from the PUBCO in its commercial agreement with publicans and at the same time adding new regulatory costs to the PUBCO business - a double whammy to the bottom line: I think we'll get MORE pub closings and HIGHER beer prices.

The OFT said additional regulation was not warranted. The OFT did not support CAMRA's claim "that the actions of pub-owning companies lead to higher retail prices in tied pubs." OFT did find beer prices would be higher due to higher rent in urban locations. If OFT thinks there's no action needed here, why don't we accept their decision? Taxpayers pay for that organization to impartially decide these

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sorts of issues. If we don't believe that they're competent, or if we feel they're ineffective, why do we keep funding them? OFT should be closed, if this is the case, and the savings returned to taxpayers.

The CAMRA push for more intervention in this instance seems to ignore the likely reasons for the pub closures.

Pub closures are highlighted as a major reason to act both by CAMRA and BIS, yet no one talks about the pub openings.

The PUBCO I'm sitting in right now, which by the way offers a better Internet connection than the local library, and

brings in excellent new ales every week, is opening new pubs all over. The other pub I frequent, a little further away but

still within easy walking distance, has its own brewery. It is wonderful!

This is where the real innovation is.

Wouldn't it be a shame if proposed regulation came into effect raising the price of a pint and the little guys took it as a cue to

raise their prices, as well? (Although I understand the smaller companies are not included in your proposed legislation, these people are not ignorant of the price structure in the marketplace and would naturally raise prices,

given the opportunity - just human nature.)

We should be talking about a beer duty up 35 pct. in 5 years, or beer taxes representing 32-38 pct. of the price of a pint, today

(one source; others higher). We read of Britain paying a disproportionate amount of beer tax - paying 40 pct. of the

total EU tax bill whilst drinking only 13 pct. of the beer. The British Beer & Pub Assoc. reports that the number of barrels

consumed is the lowest in a decade. No wonder pubs are closing.

"The power to tax is the power to destroy."

-- Daniel Webster (1782-1852)

I'd say various British politicians have proven that one over the years. (I hope this present CAMRA action doesn't divert attention

from the central issue: years of punitive and confiscatory taxation on beer drinkers.)

We don't need a 'powerful' new regulator. We need a tax 'roll-back'.

Let's just leave this PUBCO debate, finally, and get back to the real issue. Let's focus on reducing the beer taxes and

duties and stop penalizing the ale and beer drinkers. (Yes I know the escalator has been removed but somehow my pint is

still costing me more,)

Thank-you.

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Problems with the online survey:

I started the online form but found it did not support the option of "DO NOTHING" throughout the survey. The questions seemed to lead toward a conclusion of "MORE GOVERNMENT INVOLVEMENT". I felt the survey was 'leading'. There was supposed to be a link at the bottom of the form for non-conforming opinions, but I didn't see it. So I wrote this e-mail.

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