

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

6<sup>th</sup> June 2013

I feel compelled to write and express my concerns regarding the potential implications of the government consultation into the relationship between pub companies and their licensees. The consultation is biased in its structure, and there is a grave danger that it could lead to ill-considered legislation that will change the industry for the worse and lead to an acceleration of pub closures. As such I urge you to look at this consultation on behalf of all your constituents that may be affected by any ensuing legislation.

I work as a Business Development Manager for Admiral Taverns, which owns 1,050 pubs across England and Wales. Admiral was recently awarded the prestigious award of Leased and Tenanted Pub Company of the year by the Publican's Morning Advertiser trade newspaper, an award which recognised the views of our licensees gathered confidentially by an independent market research company which demonstrated that the vast majority of our licensees would recommend us to another licensee as a good business to work with. This endorsement of our business seems to be in marked contrast to some of the assertions made in the consultation document, which in my view contains many inaccuracies and is prejudiced towards the views of a relatively small but vocal minority.

I do recognise that there have been issues between the very large pub companies and their licensees in the past which are being addressed through the implementation of an industry voluntary framework code. As a result real improvements have been made through the introduction of meaningful checks and balances with all companies being held to account through an independent industry adjudicator. I do not believe that statutory intervention is appropriate until such time as the voluntary framework has been given the proper time to be fully implemented and embraced. Admiral Taverns as a business have never had a licensee complain about us to the independent self-regulatory adjudicator and neither have we had any rents appealed for external arbitration or adjudication, so I am completely bemused as to why BIS seems to be targeting Admiral Taverns for such action.

Beyond the recommendation of a statutory code some of the other recommendations would pose a serious threat to the viability of a number of my pubs and change the emphasis of the relationship that we have with our licensees – from one of partnership and support to that of commercial landlord and tenant. I do not believe that this would be in the interests of our licensees or the wider pub sector which is already reeling under the weight of over regulation and onerous taxation, although the recent small beer duty reduction was of course very welcome.

I therefore ask you to liaise with your colleagues and ensure that the consultation process is more balanced, focusing on the facts and real evidence, rather than myth, hearsay and the opinions of a relatively small and unrepresentative group. Finally, should you feel it appropriate, I would be very happy to meet with you at one of our pubs, with one of our licensees to outline our concerns and the flaws in the consultation process?

Yours sincerely

Business Development Manager – Admiral Taverns