

5th June 2013

Pubs Consultation
Consumer & Competition Policy
Dept. for Business, Innovation
& Skills
3rd Floor
Orchard 2
1, Victoria Street
Westminster
SW1H 0ET

Dear Sirs,
Ref. Statutory Code governing Pub Companies & Brewers
operating Leased & Tenanted Pubs

My name is _____ and I am
employed as a Regional Surveyor by Admiral
Taverns. I write to air my concerns regarding the
consultation on a statutory code governing Pub
Companies and Brewers operating leased and
tenanted pubs. I am very concerned that the
consultation is biased in its structure and feel that
it could lead to unnecessary legislation being
brought in that could lead to even more pubs closing.
Admiral Taverns own just over 1000 pubs across
England and Wales. My own area runs from _____

_____ I work with
licensees and undertake repair and refurbishment
projects across the region. I have worked for other
pub companies in my career and can honestly
state that I am very proud to work for Admiral. We
work with our tenants; we talk to them, listen to

their concerns and try to come up with a solution that works for both parties. We recently won a very coveted award of Leased and Tenanted Pub Company of the Year awarded by the Publican's Morning Advertiser trade newspaper. This award acknowledged the views of our licensees the majority of whom would recommend us to other people as a good company to take a pub with. Admittedly we have never had a rent referred to PIRRs or to a legal settlement. Nor have we had a licensee complaint referred to PICAS so we do not fear a statutory code per se. However the proposed costs are likely to be many times that of the current self-regulatory scheme. These extra costs will need to be funded and I have a grave concern that these extra costs will fall to the pub industry as another tax. PIRRs and PICAS are staffed by independent industry experts, ex-licensees, surveyors etc and they are overseen by a governing Board which has a majority representation of licensee representative bodies such as the BII and FLVA. The current scheme is working very well - to use the old phrase "if it's not broke, don't fix it". I am aware that some of the very large pub companies and their licensees, in the past, have had issues but through the implementation of an industry voluntary framework code, real improvement have been made. The voluntary approach provides meaningful checks and balances, with companies being held to account. I do not believe that statutory intervention is appropriate the voluntary framework needs to be given the proper time to be

fully implemented and embraced. I am totally bemused why BIS is targetting us for such action. Some of the other recommendations would pose a serious threat to the viability of some of our pubs and would also change the relationship with our licensees from one of partnership and support to that of a commercial landlord and tenant scenario. I saw this in the early 1990's as a result of the Beer Orders where brewers were broken up and their pubs and licensees who previously benefited from being brewery tenants moved into the world of commercial leases where no support was given at all.

Please be very careful not to implement something that is not needed and which could be disastrous for our industry.

Yours faithfully