

24 May 2013

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

Dear Sir/Madam,

I write with respect to the Governments recent consultation document on a proposed statutory code for pub companies and tenants.

I make specific reference to Part 5 of Annex A, where I believe the honesty and integrity of the Business Development Manager has been brought into question. I have been a BDM for some years and the relationship I have with tenants has always been exemplary and my role has always been executed with the utmost professionalism.

I note that it is the Governments criteria to make each company employ a Compliance Officer to monitor the CPD of each BDM but would draw your attention to the parallel drawn within the education system where you 'The Government' use unpaid volunteers to undertake this work in the form of School Governors, why is it one rule for the private industry and another for Government?

Over the years I have undertaken a number of industry training courses which range from finance and marketing to health and safety and product knowledge always in line with the needs of the tenant and I do not see the benefit in auditing and reporting on these.

Also under part 5 (e) for us to lay down what each tenant can expect is not a tenable scenario as everyone is an individual with individual needs and everyone is different.

The voluntary code of practice had a serious impact on the way we operate and I believe when implemented rigorously is beneficial to both the brewery and the tenant.

Over the last couple of decades where the Government has intervened in the licensed trade no good has come to effect the current status quo and I refer to both the beer orders and the smoking ban.

If the Government does wish to intervene I would suggest a closer look at business rates, utility suppliers and VAT. All these bills have risen experientially over the recent years and is now a much larger and unmanageable percentage of the tenants turnover. Times are challenging enough in this current economical climate without levying a statutory code of conduct on our industry at this time.

Yours faithfully

Shepherd Neame Ltd