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Pubs Consultation
Consumer and Competition Policy
Department of BIS
3rd Floor, Oxford 2
Victoria Street
Westminster
SW1H 0ET

7 June 2013

To Whom it may concern

RE: Consultation on a statutory code governing pub companies and brewers operating leased and tenanted pubs.

I felt compelled to write to you in order to express my deepest concerns regarding the possible implications of the consultation process into the relationships between pub companies and their licensees. I feel the consultation is very one sided in its claims and recommendations and there is a grave danger that that it could lead to ill-considered legislation that will have great consequences for an already under pressure pub industry.

Due to this I would like to urge you to review the consultation process and any legislation that can lead from this.

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I am a very proud employee of Admiral Taverns, which own 1050 pubs across England and Wales. Admiral Taverns was recently awarded the prestigious award of "Leased and Licensed Pub Company of the year Award" by the Morning Advertiser trade newspaper. Achieving this award was an incredibly proud moment and also a reflection of the views of our licensees. Views were gathered by an independent market research company and it came as no surprise that ~~our~~ the vast majority of our licensees would recommend us to other licensees and a great business to work with. On a personal note, as part of the support team actively involved in daily support to our licensees, these views are continuously present on a daily basis. This testimony and endorsement of our licensees seems to be very much the opposite of some of the assertions made in the consultation document. The only conclusion I can make to this is that the document contains many inaccuracies about the real relationship between us and our licensees and is very prejudiced towards the views of a small but vocal minority.

I am well aware that in the past there have been issues between the very large pub companies and their licensees. The recently implemented industry voluntary framework code allows for important ^{and} meaningful checks that allow for a balance to be achieved with pub companies being held to account. The voluntary framework has only been in place for a very short time and I don't believe has been given enough time to be truly embraced and implemented, therefore statutory intervention at this time is completely inappropriate. Our relationship with our licensees is very much one of a partnership and as a business we have never had a licensee complain about us to the self-regulatory adjudicator and we've never had any rents appealed for external arbitration or adjudication.

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This does leave me with a great question mark as to why the BIS seems to be targeting us for such action.

In addition to the recommendations of a statutory code, some of the other recommendations would pose a real danger to the viability of some of our pubs. This would also in no doubt change the relationship with our licensees to a cold tenant and landlord relationship. The pub industry is already suffering under over regulation and incredibly high taxes (although the small reduction in beer duty was very welcome) I do fear that the recommendations would cause even more harm.

As someone with a true passion for the great tradition of the British pub, I do also have a great concern for the future of this great pub industry if this consultation process does not undergo a review. I therefore urge you to ensure that this consultation process is balanced and that the focus is on the right facts and based on real evidence instead of myth, hearsay and the opinions of a very small and unrepresented group.

Yours Sincerely