

**NORTHERN IRELAND ASSEMBLY
COMMITTEE FOR COMMUNITIES**

**CALL FOR EVIDENCE AND VIEWS ON THE LICENSING AND
REGISTRATION OF CLUBS (AMENDMENT) BILL**

Please note that in most cases your written submissions will be published on our website and may be quoted in the Committee's report or in Committee meetings (which are public and broadcast).

If you would like to request that what you tell us is published without your name, please contact the Clerk at the following email address: Committee.Communities@niassembly.gov.uk or by calling 028 9052 1939.

We will consider all requests for information to be treated anonymously.

Please provide comment on any or all parts of the template. If you do not agree with a particular clause, please consider suggesting how it should be amended to meet its objective.

Please indicate if you are providing a submission:

- as an individual
- on behalf of an organisation or business

SUBMISSION FROM: CAMRA NI, the Campaign for Real Ale

If you are responding on behalf of an organisation or business, please tell us briefly how it relates to the subject matter of the Bill:

CAMRA, the Campaign for Real Ale, is a consumer organisation campaigning to improve customer choice and to promote the social, community and public health benefits of well-run pubs. We have over 180,000 members across the UK and have been campaigning in Northern Ireland for over 35 years.

1. The Policy Objectives of the Bill

The policy objectives of the Bill are *“to introduce a balanced package of measures to update the law in respect of the retail sale of alcoholic drinks and to make it more responsive to the current social and economic environment”*.

1. What are your views on the overall policy objectives? Do you think that the Bill will meet those objectives? If not, why not?

The provisions in the Bill are a big step in the right direction, but some elements of the Bill fall short of meeting the overall policy objectives.

To be fully responsive to the current social and economic environment the Bill needs to go further in several key areas - particularly to meet current and future demand from local consumers and tourists.

Improving consumer choice, boosting tourism, and allowing small local breweries to expand by allowing consumption on-site:

- The Bill as it stands does not go far enough as it limits on-site consumption for the holder of a producer's licence to a sample following a premises tour.
- This will not allow consumers to enjoy a wide range of locally produced beers in a taproom setting which are not generally available elsewhere due to the stranglehold of large, global brewing and pub-owning businesses on most taps and packaged drinks on offer in the majority of pubs in Northern Ireland.
- Local consumers deserve choice and the ability to responsibly enjoy locally produced and speciality beer and cider in a producer's taproom setting without having to pay for and go on a premises tour every time.
- The legislation must also allow revenue growth in experiential tourism and growth in alcohol producers offering top quality alcohol products where the focus is on taste comparison. high quality over quantity, and targeted at a premium market
- Northern Ireland's growing reputation for high-quality locally produced food and drink would also be enhanced if the Bill were extended to allow for taprooms. This would help to make Northern Ireland a destination for high-quality cask and craft beers.
- We believe that more diversity, choice and competition in the beer and pubs sector will have a positive impact on producers, consumers, and tourism.
- Brewery taprooms operate very successfully in the rest of the United Kingdom and in most other parts of Europe and the world.
- Indeed, in jurisdictions like Sydney, Australia, where consumption on-site was limited to samples legislation has had to be updated to allow for taprooms to meet growing demand for beer tourism.
- The Republic of Ireland's legislation allowing consumption on-site after a premises tour has only led to a handful of breweries applying for a licence as the requirement for consumption to follow a tour is not an attractive prospect for local consumers and lots of tourists.

Improving consumer choice and addressing access to market issues through wholesale reform of the licensing system:

- The Bill also fails to consider wholesale reform to the licensing system which stifles consumer choice, prevents competition, makes it difficult for individuals and small businesses to enter the beer and pubs sector and had led to a loss of community pubs across Northern Ireland.
- For legislation to meet the policy objective of updating the law in respect of the retail sale of alcohol drinks, and to make it more responsible to social and economic needs, we believe that the licensing system in the round - including the surrender principle - needs to be examined with a view to reform.
- The surrender principle makes it difficult for smaller and specialist pubs and venues to enter the market, limiting consumer choice and stifling local business.
- In addition, the current licensing regime has seen a reduction in the number of pubs, as when licences are surrendered they are often purchased by large supermarkets. This had led to pub closures and reduces the opportunity for pubs to act a social hub for communities (particularly in rural areas).
- CAMRA believes that liquor licensing legislation should encourage the responsible consumption of alcohol the regulated, supervised setting of a community pub rather than encouraging the consumption of cheaper supermarket alcohol at home.
- We do not think that this can be achieved with examining the case for wholesale reform of the licensing regime and the surrender principle.

Future proofing:

- We believe that the legislation needs to, wherever possible, allow for changes to the legislation to be made by secondary legislation so that local drinks producers and pub-goers, beer and cider drinkers and tourists are not in a situation where businesses and consumer choice are stifled and cannot react to trends and demands whilst they wait for primary legislation.
- At the moment the proposals for a producer's licence to only allow samples following a tour or to sell at a limited number of external events and markets means is unlikely to stand the test of time and allow local brewing businesses to grow, adapt and expand to changing tastes and demands from locals and tourists alike.

2. Easter Opening Hours and Additional Permitted Opening Hours

What are your views on the provisions in the Bill on:

(2a) The removal of restrictions at Easter [Clauses [1](#) & [23](#)]?

CAMRA NI supports extending normal late opening to the Thursday before Good Friday and on Easter Sunday. We support removing the current restrictions on Good Friday. We think normal late opening should be permitted on the Saturday before Easter Sunday.

CAMRA NI believe that reforming Easter licensing hours is vital for local pub businesses and in order to bring benefits to the tourism sector over Easter weekend.

(2b) Additional permitted hours for certain licensed premises [[Clause 2](#)]?

- We support the provisions in the Bill on extended hours.
- CAMRA maintains that there are major social, cultural and health reasons for promoting responsible drinking in pubs and clubs, where the sale and consumption of alcohol is supervised in a community setting.
- The social and community value of pubs is now well-documented, and indeed the United Kingdom Government is seeking to preserve pubs as a social institution through favourable policy initiatives.
- We therefore believe the Department for Communities should support positive action to support pubs and to increase the proportion of alcohol consumed in responsible environments and community settings in the on-trade – including by extending permitted hours.
- CAMRA's policy position is that responsible licensees should be free to open any hours that he/she chooses. Licensing authorities acting on complaints should have powers to control the opening hours of premises causing proven public nuisance or disorder.

(2c) PSNI authorisation for additional permitted hours for smaller pubs [[Clause 4](#)]?

- CAMRA is in favour of permitted hours for smaller pubs, believing that these small businesses increase consumer choice and that they should be given a level playing field with larger pubs, businesses, and chains.

- We are not in favour of any extra PSNI authorisation, or other regulatory burdens, for smaller pubs compared to their larger competitors.

3. “Drinking-up Time” and the Alignment of Alcohol and Entertainment Licences

The Bill contains provisions to extend the current “drinking up” time in licensed premises and private members’ clubs from 30 minutes to 1 hour [**Cl**auses **5** & **24**].

The Department for Communities states that the aim is to discourage customers from drinking too quickly and to allow a more gradual departure from premises at closing time, especially from large venues.

(3a) What are your views on the extension of “drinking-up” time?

CAMRA believes it would be sensible to support extending drinking-up time from 30 minutes to an hour in order to encourage a gradual dispersal of customers to minimise disruption.

(3b) What impact do you think it would have on alcohol consumption towards closing time and during ‘drinking up’ time?

We are confident that responsible pubs & responsible licensees will continue to encourage responsible drinking towards last orders and closing time in order to prevent any problems during drinking-up time.

(3c) What impact do you think it would have on issues such as anti-social behaviour and crowd dispersal?

Staggered closing times would help with any anti-social behaviour and crowd dispersal issues. Co-ordinated thinking between licensees and with other resources like taxis and public transport is needed to ensure a joined-up approach, rather than the onus solely being on pub operators.

(3d) Do you have any comments on the proposals to align closing time for liquor and entertainment licences [Cl**ause **3**]?**

CAMRA would support giving the licensee the choice over whether to allow entertainment after drinking up time if they want to.

4. Supporting Tourism, Special Events and Small Producers

(4a) Do you think that the provisions contained within the Bill will have a positive impact on hospitality and/or tourism and in Northern Ireland? If so, how?

The current law is a real barrier to the expansion of the food and drink industry in Northern Ireland. However, the provisions in this Bill will not have a significant impact on the ability of drinks producers to expand the tourism and hospitality offer unless the Bill is amended.

Consumption on-site:

- Whilst some local brewers and cider makers would welcome the ability to sell their products to take away after a brewery tour, this would **not** make a significant difference in their ability to grow their businesses, access local markets and employ more people.
- The Bill also needs to go further by allowing producers to sell their own products from consumption on their own premises.
- Local consumers want to enjoy a range of locally produced, high quality and high price point drinks in a taproom setting.
- There is also a clear demand from tourists to be able to sample and buy high-quality, high price-point alcoholic drinks that have been produced locally. They are unable to under the current liquor licensing regime.
- Operating taprooms would also enable local breweries and cider producers to expand, grow their businesses and employ more people
- Building brand awareness through taprooms would also help to ensure local brands and local beers become more well-known and are subsequently stocked in more pubs
- The legislation in the Republic of Ireland linking on-site consumption to a paid-for premises tour has not led to many small beer and cider producers opening a taproom as the legislation is complex and opportunities to offer unique experiences are limited. We are aware of only three breweries who have applied for a licence under the Intoxicating Liquor (Breweries and Distilleries) Act 2018.
- Given the importance attached to supporting and buying local food produce from Northern Ireland, it would be beneficial for liquor licensing legislation to be amended so that more people can support local businesses and buy local beer and cider in taproom settings - and subsequently in more pubs - rather than the vast majority of sales going to large multi-national brewing companies.

Giving local producers a fair crack of the whip and access to local markets:

- NI's local drinks producers are being hampered by anti-competitive licensing laws which disadvantage them on an all-island basis and compared to their competitors in the UK market.
- Local breweries and cider producers need a level playing field with their counterparts in Great Britain and the ability to access more markets than the direct sales provisions in the Bill provide for.
- All-island tourism initiatives are being hampered by anti-competitive laws which are disadvantaging local drinks producers compared to their competitors
- Whilst more and more national and local food and drink events are being organised as part of tourism strategies, local producers are often unable to sell due to licensing restrictions.
- Where producers are able to attend, having to sell through a middleman and having to meet conditions and costs imposed by the licence holder means that it is often not financially viable for small producers to attend and sell at local events and markets.
- As local beer and cider producers often are not present at food and drink festivals, international buyers and those looking to invest in Northern Ireland often do not meet local producers, adding to the problems they face in trying to expand their businesses.
- However, the provisions in the Bill to sell at events and markets are too restrictive, making it difficult for smaller producers to be able to sell at regular markets and events in village and town centres without a lengthy application and approval process which may put many small businesses off from doing so.
- We believe that the Bill should be less restrictive in stipulating which events local producers can sell at; and the bureaucratic process of having to apply for permission from the Department and PSNI.

(4b) What are your views on the proposals relating to permitted hours for special events [Clauses 6 & 25]?

CAMRA supports alternative permitted hours for events, with appropriate controls and conditions in place.

- The power to extend permitted hours at designated events would give consumers more choice and should make sure that local businesses in the pub sector can benefit from extra custom.

- Breweries, cider producers and consumers have told us that the existing licensing regime has not been flexible enough to ensure that local businesses can sell their produce at events, and that licensed premises are not able to meet demands.
- Examples include: the BBC Good Food Show in 2016 and 2017 where local breweries and cider producers were unable to sell their products directly to consumers at the show; the 2011 MTV music awards; the 148th Royal Open at Portrush in July 2019 where local producers were unable to secure a taproom licence to sell their product directly to the public; and Hillsborough Castle and Gardens Food Festival where local producers found it difficult to be able to sell to the public.
- CAMRA wholeheartedly supports moves to allow the sale of alcoholic drinks for consumption off the premises at a “special event” – as long as this would allow local brewers and cider producers in Northern Ireland to be able to sell high quality local produce from stalls, at markets and at events.
- This would increase the availability of local beers and ciders to local consumers and visitors and help local businesses to build their reputation and expand.

(4c) What are your views on the provisions of the Bill that are aimed at supporting small local producers of beer, cider and spirits [Clause 8]? What impact do you envisage this could have on tourism? Do you feel that the regulatory framework, as outlined in the Bill, is sufficiently robust?

Whilst creating a new category of licence for local producers is welcome, in order to properly benefit tourism, jobs, the economy and consumer choice the Bill needs to go further.

- NI’s small, independent breweries and cider producers also need the ability to sell their own products at a taproom on their own premises (for consumption on site).
- Whilst some local brewers and cider makers would welcome the ability to sell their products to take away after a brewery tour, this would **not** make a significant difference in their ability to grow their businesses, access local markets and employ more people.
- Breweries should be allowed to open taprooms selling their own beers for consumption on site. This would deliver increased business sustainability for fledging new brewers; a boost for our tourism sector; and make it easier for consumers to access tasty and distinctive local brews.

Impact on jobs:

- Many local brewers would like to expand their businesses and employ more people but are unable to do so due to restrictive licensing laws and their inability to access markets through direct sales.
- The Society of Independent Brewers (SIBA)'s 2019 *British Craft Beer Report 2019* found that on average 4.5 full-time and 1.6 part-time staff are employed by SIBA member breweries, with 37% of employees living in the same town or village as their employer brewery, with nearly another 30% living within five miles.
- CAMRA believe that with changes to liquor licensing legislation, brewers and cider producers in Northern Ireland would be able to grow their businesses, sell more of their produce and create more jobs just as their counterparts in Great Britain have been able to.

Impact on tourism:

- The current law is a real barrier to the expansion of the experiential food and drink offer in Northern Ireland.
- There is a clear demand from tourists to be able to sample and buy high-quality, high price-point alcoholic drinks that have been produced locally. They are unable to do that whilst breweries are unable to sell their own products on the premises in a tap room setting.
- Consumers are increasingly seeking different experiences and quality and small independent breweries that hold events and sell beer directly to the public are well placed to respond to these trends. Limiting interaction with tourists to a tour and a sample is too restrictive.
- Taprooms operate successfully in all other parts of these islands, and across the world, in tandem with existing pubs.
- They are increasingly popular with tourists looking to sample high-quality, distinctive, and locally produced drinks.
- Taprooms are a community setting where the sale and responsible consumption of alcohol is supervised. The products that these brewers are producing are high quality, local produce with a high price point as part of a visitor experience.

Fair access to market for local producers:

- The current anti-competitive nature of NI's beer and pubs sectors means that small and local brewers and cider makers cannot sell their products in the vast majority of local pubs.
- This is because pubs are often locked into contracts, loans or informal agreements with global brewers that restrict them from selling locally brewed

beers. This prevents new businesses selling their products as permanent or guest beers. Small and independent brewers and cider makers are therefore at a huge disadvantage compared to their competitors in other parts of these islands.

- As a result, small businesses need other routes to market and the ability to sell their products directly from shops or taprooms on their premises - where it is safe and suitable to do so.
- This is why a small change to this Bill is vital to allowing other routes to market for locally produced beer and ciders and to increase consumer choice.
- We believe that fair competition in the beer and pubs market would deliver benefits for consumers and is to be welcomed.
- It is illogical for some pub businesses to simultaneously argue that there is little or no demand for locally produced craft beer and that allowing brewers to open a taproom selling only their own produce would be competition for their pubs.

5. Children and Young People (under the age of 18)

The Bill contains a number of provisions directly relevant to children and young people. The Committee is keen to hear your views on the provisions of the Bill relating to children and young people and the proposed additional safeguarding measures, where relevant.

What are your views on:

(5a) The removal of the requirement of a licensed premises or registered club to hold a children's certificate [Clauses 10 & 26**]?**

CAMRA supports licence holders not having the expense of having to apply for a physical children's certificate.

CAMRA believe accompanied children should be allowed in pubs, clubs and taprooms provided suitable facilities are available. There should be no requirement in law that the premises should require a children's certificate that places restrictions on where children may be present or until what time.

CAMRA believe that the emphasis should be on the publican's decision whether to admit children, and the responsible adult's judgement whether the pub is suitable for the child.

If this position cannot be realised under licensing laws, then CAMRA would support licence holders not having the expense of having to apply for a physical children's certificate.

(5b) Permitting certain premises to hold underage functions; the conditions that must be met; the permitted opening hours; and, proposed enforcement action [Clauses 11 & 27]?

CAMRA believe accompanied children should be allowed in pubs and clubs provided suitable facilities are available, based on the licensee's decision whether to admit children, and the responsible adult's judgement whether the venue is suitable for the child.

(5c) Permitting the attendance of young people to remain on licensed premises to attend a private function (e.g. a wedding reception) and the proposed conditions that must be met [Clauses 12 & 28]?

CAMRA believe accompanied children should be allowed in pubs and clubs provided suitable facilities are available, based on the licensee's decision whether to admit children, and the responsible adult's judgement whether the venue is suitable for the child.

(5d) The strengthening of the current law around the delivery of alcohol [Clauses 9] and the delivery of alcohol to young people [Clause 13]?

CAMRA NI support moves to prevent under 18s being able to access alcohol through the likes of click and collect lockers.

(5e) The prohibition on self-service and sale of alcohol by vending machines [Clauses 15 & 30]?

We would not have a problem with self-service alcoholic drinks where there is sufficient licensee supervision and with appropriate controls and conditions in place. For example, the ability to pour your own drink whilst being supervised in a pub or bar.

(5f) Permitting children and young people to be present in a sporting club to 11:00pm during the summer months (1 June to 31 August) [Clause 29]?

We believe that sporting clubs should be community and family-friendly venues, and that children should be allowed to be present if the licensee is happy for them to be and subject to the responsible adult's judgement whether the club is suitable for the child.

(5g) Permitting children and young people to attend an awards ceremony in a sporting club one night per calendar year (until 11pm) [Clause 29]?

N/A

(5h) Overall, do you feel the measures are adequate to protect children and young people from alcohol related harm? If not, why not?

We do not see anything in this Bill that would increase the ability for those under 18 to gain access to alcohol.

6. Alcohol Consumption and Alcohol-Related Harm

The Bill proposes to address certain aspects of alcohol consumption and related harm, for example:

- **Introducing a number of restrictions on off-sales drinks promotions in supermarkets [Clause 16];**
- **Regulating the delivery of alcoholic drinks to young people [Clause 13];**
- **Prohibiting the awarding or redemption of loyalty or bonus points for the purchase of alcohol in licensed premises [Clause 17]; and**
- **Prohibiting the sale of alcohol by way of self-service or vending machine (with certain exceptions) [Clauses 15 & 30].**

(6a) What impact do you think these measures will have on reducing alcohol consumption and preventing alcohol-related harm?

- CAMRA wants to increase the proportion of alcohol consumed in a socially controlled environment of a well-run pub as opposed to unregulated consumption of cheaper supermarket alcohol at home.
- We believe that the measures in this Bill would not deliver wholesale reform of the licensing system that is needed to reduce pub closures at the expense of off-licences. Reform of the surrender principle would make it viable for smaller, local and community pubs to open.
- Increasing opportunities for supervised, regulated and responsible consumption of alcohol in local, community pubs would reduce unsupervised drinking at home and alcohol-related harm. It would also realise the benefits of pub-going on people's mental wellbeing, helping to tackle loneliness and social isolation.
- We support regulation of the content and presentation of alcohol advertising, and condemn irresponsible alcohol promotion, particularly those targeted at 18–25-year-old drinkers.
- CAMRA opposes price controls within the brewing industry as we believe that competition is the key to protecting the consumer interest. However, the use of alcohol as a loss leader within the off trade is anti-competitive and needs to

be addressed. CAMRA therefore supports action to prevent the sale of alcohol as a loss leader.

- CAMRA would be concerned if this legislation prevented the ability for our own real ale discount scheme or any other membership benefit or voucher scheme to be operated by responsible licensees under the provisions in Clause 17.

(6b) Do you have any other comments in relation to any other aspect of the Bill in relation to alcohol consumption and alcohol-related harm?

N/A

7. Regulation, Enforcement, Offences and Penalties

(7a) The Bill proposes to allow statutory approval for voluntary industry-led codes of practice in relation to the sale and supply of alcohol in licensed premises and registered clubs [Clauses 19 & 32]. Do you feel these are an effective means of helping to regulate the industry? If not, what alternatives would you suggest?

- The Portman Group operates codes of practice on naming, packaging, promotion of and sponsorship by alcoholic drinks in the UK. There may not be a need for additional codes of practice.
- If the Department was given the ability to draw up codes of practice on drinks promotions any codes must be drawn up in consultation with consumers, small pub businesses and local brewers and cider makers.
- It would not be acceptable for big international businesses and their representatives, trade bodies or private companies acting in this capacity to have undue influence over any codes of conduct on alcohol pricing and promotion in Northern Ireland which would apply to everyone in the sector.

(7b) The Bill contains provisions to permit a court, when determining an application for an occasional licence, to impose terms and conditions on the licence with consequences for non-compliance [Clause 18]. What are your views on this?

Festivals and events:

- Occasional licences have an important role to play in allowing events like Belfast Beer Festival to be held. We have concerns that if courts imposed

strict conditions under the existing occasional licensing regime then this would prevent important events and festivals from taking place.

- We would like the Committee to investigate the possibility of amending the legislation in order to create a system whereby an organisation can apply for an occasional licence in order to hold a festival or event that is of merit in terms of tourism and promoting local food and drink, without the need for an existing premises licence holder to use an occasional licence for this purpose.
- For example, in Scotland voluntary organisations can apply for an occasional licence to sell alcohol from unlicensed premises. Restrictions are in place to ensure licences are only for events connected with the voluntary organisation's activities; and licences are valid for no more than 14 days, with relevant conditions attached.
- A similar scheme would allow CAMRA NI to continue to run the Belfast Beer Festival which promotes the best local producers have to offer to tourists and locals alike.

Local producers:

- In addition, if changes or restrictions on the use of occasional licences are imposed but the Bill is not amended to allow holders of a producers licence to sell their own produce on their premises then local breweries and cider producers would find themselves worse off than they are at present.
- This is because producers currently use occasional licences in order to hold occasional taproom events.

(7c) What are your views on the measures in the Bill that would require a body corporate (licensee) to notify the courts and police of any change of directorship (within 28 days) [[Clause 20](#)]?

N/A

(7d) Throughout the Bill there are a number of new offences and/or penalties under The Licensing (NI) Order 1996, The Registration of Clubs (NI) Order 1996 and The Betting, Gaming, Lotteries and Amusements (NI) Order 1985. The Committee would welcome any comments you have in relation to these.

N/A

8. Resource Implications for Certain Organisations/Bodies

8. What do you think the resource implications will be for:

(a) The PSNI:

We have concerns that requiring approval from a senior PSNI officer in order for producers of alcoholic drinks to be able to sell at routine events, farmers markets, craft fayres etc. could place a burden on PSNI resources. We would encourage the Committee to examine these proposals and look at any alternative processes that would guarantee that only bona-fide drinks producers can sell at events without placing onerous conditions on the PSNI.

(b) Health and social services:

N/A

(c) Other organisations (please specify):

N/A

9. Registered Clubs

9. Do you have any additional comments on the provisions in the Bill which specifically relate to registered clubs [Clauses 22 to 32]?

N/A

10. Additional Information

(10a) Are there any other measures *not included* in the Bill that you think should be included and why?

Review of the surrender principle:

- CAMRA supports a wholesale review into the operation and effectiveness of the licensing system in Northern Ireland, particularly the future of the surrender principle and the costs involved for pubs, brewers, cider makers, other licence holders and consumers.

- CAMRA and our members would like to see widespread reform of Northern Ireland's licensing system in order to better support responsible consumers and to ensure fair competition between small local businesses and big international businesses.
- The current system where the vast majority of pubs are tied into buying beer from large international brewers seriously limits the ability of local brewers and cider makers to sell their products in most local pubs.
- This is why changes to the licensing legislation are vital to allowing other routes to market for locally produced beer and ciders and to increase consumer choice.
- CAMRA considers pubs to be an essential feature of both high streets and of (urban and rural) residential areas, providing community spaces, social amenities, jobs, and contributing to the local economy.
- Research conducted for CAMRA by Oxford University and published in our *Friends on Tap* report found that people who regularly go to the pub generally have more friends, are happier, and feel more connected to their local community than those who do not.
- Reforming licensing laws, reducing the cost of applying for a licence and ending the surrender principle would, therefore, lead to more sustainable and settled communities where people can continue to enjoy the various social benefits provided by well-run community pubs.
- Consumption of alcohol in a socially controlled environment is preferable to, and less likely to lead to misuse than, its consumption in isolation or in uncontrolled environments. CAMRA believe that the sale of alcohol should be adequately controlled and supervised, and that supervision and control for off-licences is often inadequate.
- It would, therefore, be preferable to reform Northern Ireland's licensing system in order to better promote and protect drinking in pubs and taprooms rather than encouraging people to drink larger quantities of cheaper alcohol bought from an off licence or supermarket and consumed at home.

(10b) Do you have any other comments you would like to make?

No

Thank you

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