

The Annual Code Report 2010

THE PORTMAN GROUP'S CODE OF PRACTICE
ON THE NAMING, PACKAGING AND PROMOTION OF ALCOHOLIC DRINKS

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Portman Group

The **Portman Group** was established in 1989 by the leading UK drinks producers. Its purpose is to encourage and champion the alcohol industry's commitment to social responsibility through its Code of Practice on the Naming, Packaging and Promotion of Alcoholic Drinks. It also represents its member companies' views on alcohol-related social issues.

Its full members are:

AB InBev UK; Bacardi Brown-Forman Brands UK; Beverage Brands UK; C & C Group plc; Carlsberg UK; Molson Coors Brewing Company UK; Diageo GB; Heineken UK; Pernod Ricard UK.

Foreword by the Portman Group Chief Executive, David Poley



The alcohol industry continued to come under intense scrutiny during 2010. In a year of political and economic upheaval, the role of alcohol in society has been a constant talking point. Reading the papers, one might be forgiven for thinking that the UK's drinking problem is worse than ever. The facts, however, paint a different picture.

The proportion of the population drinking excessively has been in decline for at least five years. As a result, overall consumption has been in decline over the same period. The most recent figures for the rate of alcohol-related deaths show a drop for the first time in nearly twenty years. There is still much work to be done but there is certainly reason for encouragement.

The industry, of course, is intent on playing its part in reducing alcohol-related harm. One of the ways in which it does this is through promoting its products responsibly. Our Code of Practice is of vital importance in this respect and helps to ensure that the industry's marketing is compatible with the public health message that alcohol should be consumed responsibly and in moderation.

Looking at this report, one might assume that my colleagues and I had a quiet time in 2010. It features only five complaints, the fewest in any year since the Code was introduced in 1996. This, however, does not tell the whole story.

The purpose of the self-regulatory system is to maintain high standards and this is not achieved simply through investigating complaints against alleged breaches of the Code. Instead, we seek to avoid any breaches from arising in the first place by operating an Advisory Service through which companies can obtain free, confidential guidance in advance of bringing out a new product or promotion. Last year saw our busiest year yet in the Advisory Service with over 500 requests for help, nearly 50% up on 2009 and over 100% up on 2008. There is no doubt that this activity is helping to

ensure that the overwhelming majority of drinks' marketing activity nowadays is responsible and thus to diminish the number of complaints which arise under the Code.

We are not complacent, however, and recognise it is important that the public is aware of the Code and how to complain. Greater awareness and vigilance among the public helps to strengthen the overall self-regulatory system. We therefore again undertook a national press advertising campaign last year to raise the profile of the Code. Further awareness-raising activity is planned in 2011, including in conjunction with the Advertising Standards Authority which is responsible for regulating all advertising for alcoholic drinks.

One of the key requirements for a successful self-regulatory system is regular review of the standards. We last reviewed our Code of Practice in 2006. We believe it is time we reviewed it again. In 2011, we shall therefore undertake an open consultation exercise to ensure our Code remains relevant, proportionate and fit-for-purpose. Please keep an eye open for this consultation and I urge you to let us have your views. We expect to issue a new edition of the Code in early 2012.

Finally, let me express thanks to my colleagues at the Portman Group who administer the Code and operate the Advisory Service so efficiently. And I should also like to thank Sir Richard Tilt and his colleagues on the Independent Complaints Panel for their diligence and wisdom in deciding on the outcome of Code complaints.

A handwritten signature in black ink that reads "DPoley". The signature is stylized and written in a cursive-like font.

David Poley
Chief Executive, Portman Group
March 2011

Report of the Chairman of the Independent Complaints Panel, Sir Richard Tilt



This, my fourth year as Chairman, has been an extremely quiet year for the Panel with only five complaints (on average there are 8–10 complaints a year). Four of the five complaints were related to products sold in small test-tubes. It is difficult to draw definite conclusions about the operation of the Code simply on the basis of numbers. On the one hand a small number may indicate that the Code is generally effective in ensuring that the vast majority of producers are behaving in a responsible way in terms of their marketing; but on the other hand it may simply be that the Code and its complaints procedure are not widely known amongst the general public. I incline towards the former explanation but I was nonetheless pleased to see another national advertising campaign towards the end of 2010 aimed at raising the profile of the complaints procedure and the Panel.

In terms of the test-tube complaints the Panel has always been reluctant to rule against a product solely on the grounds of the shape or style of the container. Our initial view was that test-tubes ran the risk of encouraging ‘down-in-one’ consumption. We did

however on this occasion ask for some research to be conducted because it was not clear cut. We concluded in the end that there was not a breach of the Code, influenced partly by the fact that the tubes contained a very small amount of alcohol (0.3 of a unit).

Two members of the Panel have retired at the end of 2010 having completed six years on the Panel – Jon Eggleton and Nigel Long. I am very grateful to both of them for their thoughtful and helpful contributions. I am now in the process of appointing their replacements via open advertisement and competition for the first time.

May I conclude by thanking the Panel and the Secretariat for their work and support over the past year.

A handwritten signature in black ink that reads "Richard Tilt". The signature is written in a cursive, slightly slanted style.

Sir Richard Tilt
Chairman of the Panel
March 2011



Yegaar

Company: Mulligans (Dumfries) Ltd

Final Decision: **23 March 2010**

COMPLAINT SUMMARY

“We submit that Yegaar is not in compliance with the Portman Group’s Packaging Code in that nothing on the front label indicates that the product is of an alcoholic nature.

1. The front label contains no product descriptor nor any other indication that the product contains alcohol.
2. The front label does not show any indication of alcoholic strength.

We would further support our complaint by observing that the product descriptor on the back label describes a category unrecognised by the EC alcohol categories and that the alcoholic strength is not printed in accordance with UK packaging regulations and is hence again not reinforcing the alcoholic nature of the product. Other customary consumer indications of the alcoholic nature of the product such as health warnings are also omitted.”

COMPLAINANT

Cellar Trends Ltd

DECISION

Under Code paragraph 3.1 **UPHELD**

The company did not respond to the complaint.

The Panel noted that there was no indication on the front label as to the content of the bottle. It therefore considered that the packaging failed to make the alcoholic nature of the product clear as required by the Code. Accordingly, it found the packaging in breach of Code paragraph 3.1.

ACTION BY COMPANY

The company agreed to amend the label in line with advice from the Portman Group’s Advisory Service.



Quivers

Test Tube Products

Final Decision: 11 May 2010

COMPLAINT SUMMARY

"Alcohol Focus Scotland would like to complain about these drinks in relation to clauses 3.2 (f) and (g) of the Portman Group's Code of Practice which state that a drink, its packaging and any promotional activity should not encourage irresponsible or immoderate consumption or urge the consumer to drink rapidly or to 'down' a product in one.

All of these drinks are sold in test-tube packaging which means they are clearly designed to be downed in one go rather than sipped. The containers cannot be set down on a flat surface so the consumer has to drink it all at once.

It is the view of Alcohol Focus Scotland that these products do not promote a positive message of safe and responsible drinking and clearly breach the Portman Group's Code of Practice."

COMPLAINANT

Alcohol Focus Scotland

DECISION

Under Code paragraph 3.2(f) and 3.2(g)

NOT UPHELD

The company explained that their product was sold in 20ml containers, the lowest volume permissible in the UK, and had a strength of 14% ABV; this meant each tube contained just 0.28 of an alcohol unit. The company maintained that 20ml was no more than a mouthful, pointing out that this was the volume recommended in the instructions for a mouthwash product. They further claimed that one was likely to consume a greater volume of liquid in a typical mouthful of beer and that one would consume a greater volume of alcohol in a 8ml sip of whisky.

Notwithstanding the above, the company also maintained that consumers were not bound to drink the tube's content in one go. The tube was re-sealable and could be set down horizontally on a flat surface. The re-sealed product could also be placed in one's pocket or handbag which, they claimed, was an advantage in nightclubs because the majority of consumers would not have access to a table and might also be worried about leaving unattended drinks for fear of them being 'spiked'.

The company further maintained that their product was relatively expensive, working out as at least £5.72 per unit of alcohol. The company said that they were able to control the price because they only sold directly to the end-user in certain bars using their own well-trained staff.

The Panel asked the Portman Group to commission independent research into the way in which consumers tended to drink products in test-tube containers and their perceptions of such products. The company simultaneously commissioned its own research on this issue.

The Panel noted from the Portman Group-commissioned independent research that it was highly likely that a test-tube drink would be consumed 'down-in-one' by the drinker. It also noted, however, that only a minority of drinkers cited the test-tube design as the cause of this drinking behaviour; drinkers were more likely to claim that they drank the product 'down-in-one' because of the small volume of liquid in the test-tube. The Panel also noted the company's arguments and the company-commissioned research findings which suggested that test-tube drinks made an insignificant contribution to alcohol misuse. The Panel acknowledged it had previously made decisions that implied a drink in a test-tube container would inevitably breach the Code for urging 'down-in-one'

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consumption (see 2009 decisions on *Rampant* and *Mwaah!*). In light of the fresh arguments and evidence that had been made available, however, and considering the relatively small quantity of alcohol contained in each test-tube, the Panel considered that this product was unlikely to cause harmful drinking behaviour and did not breach the spirit of Code in terms of urging 'down-in-one' consumption. Accordingly, the Panel did not find the product in breach of Code paragraph 3.2(g).

The Panel acknowledged that, in view of the low volume of alcohol in each container, the product's packaging could not be said to be encouraging immoderate consumption. Accordingly, the Panel did not find the product in breach of Code paragraph 3.2(f).

ACTION BY COMPANY

None needed.



Shoeyz Shots

Inatube Drinks

Final Decision: 11 May 2010

COMPLAINT SUMMARY

“Alcohol Focus Scotland would like to complain about these drinks in relation to clauses 3.2 (f) and (g) of the Portman Group’s Code of Practice which state that a drink, its packaging and any promotional activity should not encourage irresponsible or immoderate consumption or urge the consumer to drink rapidly or to ‘down’ a product in one.

All of these drinks are sold in test-tube packaging which means they are clearly designed to be downed in one go rather than sipped. The containers cannot be set down on a flat surface so the consumer has to drink it all at once.

It is the view of Alcohol Focus Scotland that these products do not promote a positive message of safe and responsible drinking and clearly breach the Portman Group’s Code of Practice.”

COMPLAINT SUMMARY

Alcohol Focus Scotland

DECISION

Under Code paragraph 3.2(f) and 3.2(g)

NOT UPHELD

The company explained that their product was sold in 20ml containers and had a strength of 14% ABV; this meant each tube contained just 0.28 of an alcohol unit. The company also maintained that consumers were not bound to drink the tube’s content in one go. The tube was re-sealable and could be set down horizontally on a flat surface or placed in a bag for later consumption. This also meant that the product was less vulnerable to ‘spiking’. Furthermore, the product was relatively expensive per unit of alcohol compared to other drinks and it was therefore not the drink of choice for immoderate or irresponsible consumers.

The Panel asked the Portman Group to commission independent research into the way in which consumers tended to drink products in test-tube containers and their perceptions of such products.

The Panel noted from the research that it was highly likely that a test-tube drink would be consumed ‘down-in-one’ by the drinker. It also noted, however, that only a minority of drinkers cited the test-tube design as the cause of this drinking behaviour; drinkers were more likely to claim that they drank the product ‘down-in-one’ because of the small volume of liquid in the test-tube. The Panel also noted the company’s arguments. The Panel acknowledged it had previously made decisions that implied a drink in a test-tube container would inevitably breach the Code for urging ‘down-in-one’ consumption (see 2009 decisions on *Rampant* and *Mwaah!*). In light of the fresh arguments and evidence that had been made available, however, and considering the relatively small quantity of alcohol contained in each test-tube, the Panel considered that this product was unlikely to cause harmful drinking behaviour and did not breach the spirit of Code in terms of urging ‘down-in-one’ consumption. Accordingly, the Panel did not find the product in breach of Code paragraph 3.2(g).

The Panel acknowledged that, in view of the low volume of alcohol in each container, the product’s packaging could not be said to be encouraging immoderate consumption. Accordingly, the Panel did not find the product in breach of Code paragraph 3.2(f).

ACTION BY COMPANY

None needed.



Shootaz

Tubular Drinks Co

Final Decision: 11 May 2010

COMPLAINT SUMMARY

“Alcohol Focus Scotland would like to complain about these drinks in relation to clauses 3.2 (f) and (g) of the Portman Group’s Code of Practice which state that a drink, its packaging and any promotional activity should not encourage irresponsible or immoderate consumption or urge the consumer to drink rapidly or to ‘down’ a product in one.

All of these drinks are sold in test-tube packaging which means they are clearly designed to be downed in one go rather than sipped. The containers cannot be set down on a flat surface so the consumer has to drink it all at once.

It is the view of Alcohol Focus Scotland that these products do not promote a positive message of safe and responsible drinking and clearly breach the Portman Group’s Code of Practice.”

COMPLAINANT

Alcohol Focus Scotland

DECISION

Under Code paragraph 3.2(f) and 3.2(g)

NOT UPHELD

Under Code paragraph 3.2(j) **UPHELD**

The company said that they had been producing test-tube cocktails since 1991. They claimed that test-tube drinks were no more likely to encourage ‘down-in-one’ drinking than many other shot-style spirit drinks that were more widely available. They disputed that the rounded bottom design meant that consumers were bound to drink the contents in one go and pointed out that, if a consumer wished, they could re-seal the container and lay it flat, or in a pocket, until they wanted another sip. They maintained that test-tube drinks had a relatively high price and limited distribution and that the problem of irresponsible or “binge” drinking was largely driven by cheap, widely available drinks in conventional packaging.

The Panel asked the Portman Group to commission independent research into the way in which consumers tended to drink products in test-tube containers and their perceptions of such products.

The Panel noted from the research that it was highly likely that a test-tube drink would be consumed ‘down-in-one’ by the drinker. It also noted, however, that only a minority of drinkers cited the test-tube design as the cause of this drinking behaviour; drinkers were more likely to claim that they drank the product ‘down-in-one’ because of the small volume of liquid in the test-tube. The Panel also noted the company’s arguments. The Panel acknowledged it had previously made decisions that implied a drink in a test-tube container would inevitably breach the Code for urging ‘down-in-one’ consumption (see 2009 decisions on *Rampant* and *Mwaah!*). In light of the fresh arguments and evidence that had been made available, however, and considering the relatively small quantity of alcohol contained in each test-tube (20ml at 15% ABV which equals 0.3 of a unit), the Panel considered that this product was unlikely to cause harmful drinking behaviour and did not breach the spirit of Code in terms of urging ‘down-in-one’ consumption. Accordingly, the Panel did not find the product in breach of Code paragraph 3.2(g).

The Panel acknowledged that, in view of the low volume of alcohol in each container, the product’s packaging could not be said to be encouraging immoderate consumption. Accordingly, the Panel did not find the product in breach of Code paragraph 3.2(f).

The Panel noted, however, that one of the variants in the Shootaz range was described as “Energy flavour”. It considered that this implied that the product could enhance mental or physical performance and accordingly found the product in breach of Code paragraph 3.2(j).

ACTION BY COMPANY

The company agreed to withdraw the “Energy flavour” version of their product.



Shot in a Tube

Shooters UK

Final Decision: 11 May 2010

COMPLAINT SUMMARY

“Alcohol Focus Scotland would like to complain about these drinks in relation to clauses 3.2 (f) and (g) of the Portman Group’s Code of Practice which state that a drink, its packaging and any promotional activity should not encourage irresponsible or immoderate consumption or urge the consumer to drink rapidly or to ‘down’ a product in one.

All of these drinks are sold in test-tube packaging which means they are clearly designed to be downed in one go rather than sipped. The containers cannot be set down on a flat surface so the consumer has to drink it all at once.

It is the view of Alcohol Focus Scotland that these products do not promote a positive message of safe and responsible drinking and clearly breach the Portman Group’s Code of Practice.”

COMPLAINANT

Alcohol Focus Scotland

DECISION

Code paragraph 3.2(f) and 3.2(g) **NOT UPHELD**

The company said that they had worked very closely with the Portman Group’s Advisory Service to try and ensure their product complied with the Code. They explained that each of their test-tube drinks contained just 0.28 of an alcohol unit, the tube could be re-sealed and they did not promote ‘down-in-one’ drinking. They disputed the complainant’s assertion that the test-tube packaging was irresponsible and considered that there were other products on the market that were more open to criticism in this regard.

The Panel asked the Portman Group to commission independent research into the way in which consumers tended to drink products in test-tube containers and their perceptions of such products.

The Panel noted from the research that it was highly likely that a test-tube drink would be consumed ‘down-in-one’ by the drinker. It also noted, however, that only a minority of drinkers cited the test-tube design as the cause of this drinking behaviour; drinkers were more likely to claim that they drank the product ‘down-in-one’ because of the small volume of liquid in the test-tube. The Panel also noted the company’s arguments. The Panel acknowledged it had previously made decisions that implied a drink in a test-tube container would inevitably breach the Code for urging ‘down-in-one’ consumption (see 2009 decisions on *Rampant* and *Mwaah!*). In light of the fresh arguments and evidence that had been made available, however, and considering the relatively small quantity of alcohol contained in each test-tube, the Panel considered that this product was unlikely to cause harmful drinking behaviour and did not breach the spirit of Code in terms of urging ‘down-in-one’ consumption. Accordingly, the Panel did not find the product in breach of Code paragraph 3.2(g).

The Panel acknowledged that, in view of the low volume of alcohol in each container, the product’s packaging could not be said to be encouraging immoderate consumption. Accordingly, the Panel did not find the product in breach of Code paragraph 3.2(f).

ACTION BY COMPANY

None needed.

Retailer Alert Bulletins

If a product's packaging or point-of-sale material is found in breach of the Code, the Portman Group takes compliance action by issuing a Retailer Alert Bulletin (RAB) asking licensees to de-stock the offending product/materials after a specified period, normally of three months. RABs are published in the licensed trade press and on the Portman Group's website and are sent to Code Signatories, police licensing officers, Trading Standards Officers, local licensing authorities and other interested parties nationwide.

PRODUCT	RAB ISSUED	COMPLIANCE DEADLINE
Yegaar	April 2010	16 June 2010

How to make a complaint under the Code

Details of the complaints process are given on our website www.portmangroup.org.uk and in our 'Guide to Complaints' leaflet, available free of charge from the Portman Group (address and telephone number below). Copies of the Code of Practice are also available from the same address on request.

The Portman Group's Code of Practice encourages drinks producers to market their products responsibly. A product might contravene the Code if its name, packaging or marketing:

- does not make it clear that it's an alcoholic drink;
- appeals particularly to under 18s;
- emphasises the alcoholic strength unduly;
- links the product with illicit drugs;
- associates the product with sexual success;
- suggests bravado, violence, dangerous or anti-social behaviour;
- makes you think that drinking it will help you become popular or successful;
- encourages illegal or irresponsible drinking, such as binge drinking or drink-driving;
- uses images of people who look and are under 25;
- suggests it can improve your mental or physical performance;
- urges consumers to drink rapidly or down their drinks in one.

The Code applies to a drink's packaging, (including its brand name) and also to point-of-sale activities and materials, brand websites, sponsorship, branded merchandise, press releases, advertorials and sampling.

If you wish to make a complaint under the Code, please write to the **Secretary to the Independent Complaints Panel** at the **Portman Group, 4th Floor, 20 Conduit Street, London W1S 2XW**.

If you would like to discuss any aspect of the complaints procedure, you are welcome to telephone **020 7290 1460** or email info@portmangroup.org.uk

The Independent Complaints Panel

The membership of the Independent Complaints Panel represents a diversity of background and experience and does not include any person employed by the Portman Group or by any of its member companies.

The Panel's procedures are set out in our 'Guide to Complaints' leaflet which is available from the Portman Group on 020 7290 1460. Each complaint is considered carefully on its own merits.



Sir Richard Tilt (Chairman)

Started his career in the Prison Service as Assistant Governor in 1966. He was Governor of a number of prisons including Bedford and Gartree. Appointed Director General of the Prison Service in 1995. Sir Richard retired from the Prison Service in 1999 and in the same year was appointed a Knight Bachelor.

From November 1999 – March 2000, he was Chairman of Kettering General Hospital NHS Trust, prior to taking up post as Chairman of Northamptonshire Health Authority in April 2000. In 2002 he was appointed chairman of Leicestershire, Northamptonshire and Rutland Strategic Health Authority. He was a member of the Sentencing Advisory Panel from 1999–2002.

In December 2000 Sir Richard was appointed as Social Fund Commissioner for Great Britain and Northern Ireland. He was appointed Chairman of the Social Security Advisory Committee with effect from 1 January 2005.



Jon Eggleton (until December 2010)

Appointed to the role of United Biscuits UK Marketing Director in December 2003. Previously 15 years' experience within the drinks industry, most recently as a plc main board Marketing Director at HP Bulmer until October 2003. Prior to Bulmers, 11 years at Diageo/Guinness in a variety of marketing roles in the UK and overseas as Director of Marketing for Guinness Asia Pacific.



Laura Hyrapetian

Graduated from Brighton and Sussex Medical School in July 2010 with Bachelor of Medicine Bachelor of Surgery and Bachelor of Science in Pharmacological Sciences. Currently working as a foundation year Doctor at St. Thomas' Hospital, Lambeth. Would like to specialise in Paediatrics or General Practice.



Fiona Lewis

Graduated from Warwick University with a Sociology and Social Policy degree in 2006. Has been a Sociology teacher at Woodhouse College, North Finchley since qualifying from the Institute of Education in 2007. Is also College Council Co-ordinator and jointly runs the Duke of Edinburgh Silver Award.



Nigel Long (until August 2010)

CEO of Naked Communications since 2006 and Head of International Agencies for Photon Group Ltd. Nigel has over 20 years' experience in the advertising industry including the creative agencies WCRS and Partners BDDH where he was Managing Director from 1995 and Chairman & CEO from 2001.



Barbara O'Donnell

Since 1997 Barbara has worked in the alcohol field in a variety of roles. She managed the Scottish Executive and Health Scotland's public education campaign, Drinkwise that sought to challenge attitudes towards alcohol consumption by taking responsibility for their own drinking behaviour. Also held the post of National Alcohol Liaison Officer for Scotland with a remit to administer the Scottish Association of Alcohol and Drug Action Teams and the dissemination of the Plan for Action on Alcohol Problems. Currently a member of the Education Core Group of the International Council on Alcohol & Addictions. Prior to working in the alcohol field she came from a teaching and training background.



Reverend Canon Professor Martyn Percy

Principal of Ripon College Cuddesdon, Oxford. Also visiting Professor of Theology and Ministry, Professor of Theological Education, King's College, London; Professorial Research Fellow, Heythrop College, London and Canon of Salisbury Cathedral. Since his ordination in 1990 he has occupied academic posts at Christ's and Sidney Sussex colleges, Cambridge, the University of Sheffield and Lincoln Theological Institute for the Study of Religion and Society. Martyn worked as Academic Advisor on the Spirit Zone project in the Millennium Dome and presently sits on the Church of England's Faith and Order Advisory Group.



Stephen Robinson

Currently the Director of Student Services for De Montfort University, which offers a wide range of advice and guidance to students. Previously 21 years within the public, private and Higher Education sector covering a wide range of disciplines primarily focusing on operations and customer services.

The Portman Group's Code Advisory Service

As part of its responsibility in operating the Code of Practice, the Portman Group offers a free, fast and confidential Advisory Service.

The service gives drinks producers, importers and retailers the opportunity to seek advice, in advance, about the packaging and below-the-line marketing of any pre-packaged alcoholic drink that is to be sold in the UK. This enables any concerns about any possible breaches of the Code to be discussed and dealt with at an early stage.

Seeking advice can help companies to avoid the expense and bad publicity of having to make changes in response to an upheld decision by the Panel in the event of a complaint.

Companies wishing to seek advice under the Code should contact us by telephone on **020 7290 1460** or by email on **advice@portmangroup.org.uk** with details of their plans.

Over 140 companies have signed up to the Portman Group Code of Practice to indicate their support for the Code and their willingness to abide by and, in the case of retailers, help enforce, the decisions of the Independent Complaints Panel.

10 International Ltd	First Drinks Brands Ltd	Meantime Brewing Company Ltd
AB InBev UK	First Quench Retailing	Merrydown plc
Adnams plc	Frederic Robinson Ltd	Miller Brands (UK) Ltd
Alcohols Ltd	Fuller Smith & Turner plc	Mitchells & Butlers plc
Ampleforth Abbey Trading Ltd	G T News Ltd	Mitchells of Lancaster (Brewers) Ltd
Arkell's Brewery Ltd	Global Brands Limited	Molson Coors Brewing Company UK
ASDA Stores Ltd	George Bateman & Son Ltd	National Association of Cider Makers, The
Association of Licensed Multiple Retailers	Gin & Vodka Association of Great Britain, The	Nisa-Today's (Holdings) Ltd
Avery's of Bristol Ltd	Gray & Sons (Chelmsford) Ltd	Northern Ireland Drinks Industry Group
Babco Europe Ltd	Greene King plc	Oddbins Ltd
Bacardi Brown-Forman Brands UK	Grupo Codorniu	Palmer & Harvey McLane Ltd
Beam Global Spirits & Wine	H&A Prestige Packing Company Ltd	Pernod Ricard UK
Beverage Brands (UK) Ltd	Halewood International Ltd	Proximo Spirits
Black Sheep Brewery plc, The	Hall & Woodhouse Ltd	Punch Taverns
Blavod Drinks Ltd	Harvey & Sons (Lewes) Ltd	Rank Group
Booker plc	Hayman Ltd	Reformed Spirits Company, The
British Beer & Pub Association	Heavitree Brewery plc, The	Rubicon Research Ltd
Brothers Drinks Co. Ltd	Heineken UK	S A Brain & Co. Ltd
Bulmers Ltd	Hi-Spirits Ltd	Scotch Whisky Association, The
Burn Stewart Distillers	Hook Norton Brewery Co. Ltd	Sharp's Brewery
C & C Group plc	Hyde's Brewery Ltd	Shepherd Neame Brewery Ltd
Cains Beer Company plc	Ian Macleod Distillers Ltd	Shooters UK Ltd
Caledonian Brewing Company Ltd, The	Icon Distillers UK	Somerfield Stores Ltd
Carlsberg UK	Intercontinental Brands (ICB) Ltd	Sovio Wines Ltd
Carnivale Brands	Inver House Distillers Ltd	Speyside Distillers Co Ltd
Castle Brands Spirits Group GB Ltd	J Chandler & Co (Buckfast) Ltd	St Austell Brewery Co. Ltd
Cellar Trends Ltd	JC & RH Palmer Ltd	Timothy Taylor & Co. Ltd
Charles Wells Ltd	JD Wetherspoon plc	Tesco Stores Ltd
Cobra Beer Ltd	John E Fells & Sons Ltd	Test Tube Products Ltd
Cocktail Mania Ltd	Joseph Holt plc	Universal Brand Ltd
Concha y Toro UK Ltd	J Sainsbury plc	Vertu Spirits Ltd
Constellation Wines Europe Ltd	JW Lees & Co (Brewers) Ltd	Vickery Wines Ltd
Continental Wine & Food Ltd	J Wray & Nephew (UK) Ltd	Wadworth & Co. Ltd
Co-operative Group, The	Kingsland Wines and Spirits	Waitrose Ltd
Costcutter Supermarkets Group Ltd	Lanchester Wine Cellars Ltd	Waverley TBS
Daniel Batham & Son Ltd	Landmark Cash & Carry Ltd	Wells & Youngs Ltd
Daniel Thwaites & Co. Ltd	London & Scottish International Ltd	Welsh Whisky Company Ltd, The
De Vere Group plc t/a G & J Greenall	Maclay Group plc	WH Brakspear & Sons plc
Diageo Great Britain	Majestic Wine Warehouses Ltd	Whiskynet
Edrington Group, The	Marblehead Brand Development Ltd	Whitbread Group plc
Ehrmanns Ltd	Marks and Spencer plc	Whittalls Wines Ltd
Elgood & Sons Ltd	Marston's Inns and Taverns	Whyte & Mackay Ltd
Enterprise Inns plc	Marston's plc	William Grant & Sons Distillers Ltd
Everards Brewery Ltd	Marston's Pub Company	Wine and Spirit Trade Association, The
F&B Partnership Ltd, The	Martin McColl	Wm Morrison plc
Federation of Wholesale Distributors, The	Matthew Clark Wholesale Ltd	Wye Valley Brewery
Felinfoel Brewery Co. Ltd, The	Maxxium UK Ltd	Young & Co's Brewery plc
First Choice Wholesale Foods	McMullen & Sons Ltd	

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