

The Annual Code Report 2011

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; SHS Drinks (formerly Beverage Brands (UK) Ltd); 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, Henry Ashworth



As the watchdog for the alcohol industry, we are determined that the UK has a rigorous framework of self-regulation to ensure alcohol products are marketed responsibly and only to adults.

The UK's self-regulating approach to alcohol marketing is regarded as the gold standard and is used as a benchmark for other European countries. We are pleased that the strength of this self-regulation has been recently recognised in the Coalition Government's Alcohol Strategy, which acknowledges the role of the Portman Group in responsible alcohol marketing and pledges to work with us to take irresponsibly marketed products off the shelves.

As an industry though, responsible alcohol producers want to go further. The Portman Group's commitment to the Government's Responsibility Deal is the kind of bold, proactive approach that we want to adopt. It shows that alcohol producers are committed to marketing their products responsibly. As part of the Deal, we are reviewing our Code of Practice to identify and tackle any regulatory gaps and to create a more robust set of marketing rules. Additionally, we have committed to develop a Code explicitly focused on responsible sponsorship. We launched a public consultation in October 2011, held a series of expert workshops and detailed workstreams which will feed into the new rules, coming into force in May 2013.

Another important part of our role is to prevent irresponsible products from coming onto the market in the first place. We do this by offering a free, fast and confidential advisory service. Over the course of this year, the Code Advice team have issued over 500 pieces of advice to drinks producers on how to ensure their products comply with the Code. The Code Advice team also provide Code training to the industry and

external agency staff on the application of the rules and will step up their efforts in this regard in preparation for the new Code launch.

I want to build on this success and ensure the whole industry is aware of our Code Advisory Service and is making full use of our expertise. This is a real opportunity to lower the frequency of products having to be taken directly off the shelves – an expensive and time-consuming process for all parties involved.

We are also proactive in identifying products already on the market that could fall foul of the Code. For example, when the new Code is launched, we will commission an independent audit of the drinks market to identify any potentially problematic products. We will work with those producers to remedy any issues in advance of the new Code being launched in Spring 2013.

I am confident that, in the course the coming year, the Portman Group will lead a real step-change in the way in which the alcohol industry self-regulates the marketing of its products. We will work closely with government, industry partners and local communities alike to champion alcohol social responsibility in new and innovative ways.

Finally, I would like to extend my thanks to Sir Richard Tilt and all our independent panel members who ensure each complaint is considered so thoroughly.

A handwritten signature in black ink, appearing to read 'Henry Ashworth'.

Henry Ashworth
Chief Executive, Portman Group
May 2012

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



It has been a year of intense scrutiny for the alcohol industry with political and media interest in the issues of immoderate consumption of alcohol and the potential societal and health consequences. If anything, public attitudes seem to be shifting towards greater acceptance of controls with work now going on aimed at introducing minimum unit pricing.

The Complaints Panel has continued in my view to operate successfully albeit with a continuing low level of complaints. As I said in last year's report it is difficult to be sure whether this is an indication of a system working well and achieving its objectives or a system that is not well enough known by the general public and I would urge the Portman Group to continue to run national awareness campaigns from time to time. On the other hand we have seen a continuation of an increase in the use of the Advisory Service by producers and this is very much to be welcomed.

Three of this year's cases merit comment:

- Kronenbourg which was a landmark for us since it related to marketing material on a third party website
- Corona Extra which was about a drinks promotion and the notion of sharing and was not upheld
- Stiffy's where the Panel decided it would not be bound by its own decision eight years earlier because it felt there had been a shift in attitudes and that it should be responsive to such changes

Looking ahead to this year the main story is the conclusion of the year long consultation on the Code which will result in the publication of a new Code. It will no doubt be another challenging year with no sign of the current concentration on alcohol issues abating at all. The outcome of the Leveson Inquiry will also be of interest to all self-regulatory bodies. The Panel will continue to work to ensure high compliance levels and responsible marketing.

The Panel remains in good heart. Two new members, Jane Keightley and Ron Finlay were appointed as a result of the open competition and have already made an excellent contribution to Panel deliberations.

David Poley left as Chief Executive at the end of the year and the Panel wishes him well in future endeavours. In his place we welcomed Henry Ashworth who has quickly settled to a good working relationship with the Panel. As always many thanks from me to Panel members for their individual contributions and to the Secretariat who support us so well.

A handwritten signature in black ink that reads "Richard Tilt".

Sir Richard Tilt
Chairman of the Panel

May 2012



Asda Premium Strong Cider

Company: Asda Stores Ltd

Final Decision: **3 March 2011**

COMPLAINT SUMMARY

“The ASDA cider I found in the supermarket has STRONG written in bold capital letters across the label. This is the predominant word on the packaging and seems to me to flaunt the Code... It seems to contravene the Code’s point about glamourising its alcoholic strength.”

COMPLAINANT

Member of the public

DECISION

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

The company said that they had reviewed the label in light of the complaint and acknowledged that it overly glamorised the alcoholic strength. They therefore undertook appropriately to re-label the product at the first opportunity.

The Panel noted that the word 'Strong' appeared in very bold font across the front label and therefore considered that alcoholic strength was being promoted as the dominant theme. Accordingly, it found the packaging in breach of Code paragraph 3.2 (a).

DECISION

The company had already agreed to amend the label. No further action needed.



Kronenbourg 1664 Spotify Promotion

Company: Heineken UK

Final Decision: 4 July 2011

COMPLAINT SUMMARY

"In an advert played between songs on Spotify, Kronenbourg are encouraging listeners to click on their link to their playlist of slowed down tracks. It seems inappropriate to me that the track "Too Drunk to Fuck" is included in this list as it promotes irresponsible drinking."

COMPLAINANT

Member of the public

DECISION

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

The company explained that Spotify was a music streaming website which offered brands the opportunity to present consumers with themed 'playlists' with a common creative theme or music genre. They said the current Kronenbourg 1664 marketing campaign centred on the idea of 'slow the pace', linking relaxed moderate consumption with music that had been uncharacteristically slowed down from its normal pace. The company's marketing agency, BBH, had bought banner advertising space on Spotify and these banners directed consumers to the Kronenbourg 1664 'slowed down' playlist. BBH confirmed that it had compiled the playlist, including 'Too Drunk to Fuck' by Nouvelle Vague, from a list of tracks compiled by bloggers and online influencers on the basis that the chosen tracks most clearly and strongly met with their creative specification. BBH

acknowledged that it did not take sufficient care and attention to consider the suitability of the song title or lyrics. The company said that when the matter was brought to their attention they accepted that the track was inappropriate and their agency immediately removed it from the playlist. The company said they had since agreed more rigorous approval procedures to ensure that a similar error was not repeated. They maintained that they had not deliberately attempted to promote irresponsible or immoderate consumption and that the track had appeared as an error of judgement. The campaign was no longer active.

The Panel noted that this was the first time it had ever had to consider a complaint about internet content under a drinks producer's control but on a third-party's website. The Panel considered that its consideration of the complaint demonstrated that the Code was sufficiently flexible to take account of emerging technologies. The Panel, while acknowledging that the company had not deliberately set out to promote irresponsible or immoderate consumption, nonetheless considered that the track name referenced drinking to excess and this in turn associated the brand with immoderate consumption. Accordingly, it found the promotion in breach of Code paragraph 3.2(f).

ACTION BY COMPANY

The company had already agreed to stop the promotion. No further action needed.



Cell Drinks

Company: Cell Drinks

Final Decision: **25 August 2011**

COMPLAINT SUMMARY

“The use of pouch-style packaging... is most comparable to a children’s drink.”

COMPLAINANT

Member of the public

DECISION

Under Code paragraph 3.2(h) **NOT UPHELD**

Under Code paragraph 3.2(j) **NOT UPHELD**

The company explained that throughout the development process of the product it had worked closely with the Portman Group Advisory Service and made changes to the product packaging in accordance with the advice received. It acknowledged that pouch-style packaging was still relatively new to the alcoholic drinks market but said that a number of other companies were now using the same format, not least because of its environmental advantages. The company pointed out that there were many other examples of packaging styles, including 330ml cans and 2 litre plastic bottles, which had been used for soft drinks but which had been adopted by the alcoholic drinks market. The company asserted that it had worked hard to ensure the packaging did not appeal to under-18s and purposely had not used imagery or bright colours which it believed could appeal to that sector; it had also ensured the alcoholic nature was clearly communicated on its packaging.

The Panel noted that the company had made regular use of the Advisory Service and seemed to have taken on board all of the advice given. The Panel also acknowledged that alcoholic drinks were sold in a range of packaging akin to the packaging used for soft drinks. The Panel considered that the packaging made very clear that the product contained alcohol. Overall, it considered that the packaging was unlikely to appeal particularly to under-18s and it accordingly did not find the product in breach of Code paragraph 3.2(h).

The Panel then considered whether the brand variant ‘Reverb’, which on its packaging claimed to have a ‘high caffeine content’, suggested that the product could enhance mental or physical capabilities in breach of Code rule 3.2(j). The Panel, however, considered that the reference to the product’s high caffeine content was a necessary warning and was made in a purely factual way. The Panel also felt the name ‘Reverb’ was innocuous and did not suggest, either directly or indirectly, that the product could enhance mental or physical capabilities. Accordingly, it did not find the product in breach of Code paragraph 3.2(j).

ACTION BY COMPANY

No further action needed.



Corona Extra

Company: Molson Coors Brewing Company UK

Final Decision: **7 October 2011**

COMPLAINT SUMMARY

"I would like to draw your attention to a current Corona promotion offering the prize to win a Trip to Ibiza.

It is a promotion in bars and going right across the UK.

To enter for the chance to win, a person must purchase a BUCKET of 5 x Coronas and they receive a code on the handle of the bucket which they then text to see if they have won an instant prize or enter for the chance to win a trip to Ibiza

I find that asking someone to purchase 5 x bottles in 1 session for 1 chance to win, certainly goes against the responsible drinking guidelines and would welcome your thoughts on this issue.

Imagine if you wanted to enter more than once!!?"

COMPLAINANT

Member of the public

DECISION

Under Code paragraph 3.2(f) **NOT UPHELD**

The company explained that throughout the development process of the promotion its agency had worked closely with the Portman Group Advisory Service. It pointed out that all of the consumer-facing point-of-sale material communicated that consumers had to purchase a bucket of Corona 'to share' in order to participate in the promotion. The company asserted that the message that the holiday prize was for the individual entrant and three friends implicitly suggested that the bucket of beer was for sharing between four individuals, reinforcing the 'share' message.

The Panel noted that the company had made regular use of the Advisory Service and seemed to have taken on board most of the advice given. The Panel considered that the point-of-sale material made very clear that the bucket of five Coronas was for shared consumption. Accordingly, it did not find the promotion in breach of Code paragraph 3.2(f).

ACTION BY COMPANY

No further action needed.



Stiffy's Jaffa Cake/Stiffy's Kola Kubez

Company: Stiffy's Shots Ltd t/a VC2

Final Decision: 8 November 2011

COMPLAINT SUMMARY

"We believe these products may represent a significant breach of the Code... by virtue of their flavour, they have the potential for particular appeal to under-18s. Whilst we do not believe that flavoured alcoholic drinks are inherently improper in their potential appeal, cola flavoured drinks and jaffa cake biscuits are sweet confectionery products which typically appeal to an audience below the age of 18. To blend cola or jaffa cake flavours with a very strong alcoholic product such as vodka brings the potential for that flavour to have a wide appeal whilst masking the drink's strength.

We believe that the colours used on the packaging are deliberate, in that they are the same principle colours used on Coca Cola and jaffa cake products. The colours used are also extremely bright, giving the product the look and feel of a confectionery product. In addition, the look of the logo, the stylised text and deliberate mis-spelling on the cola flavoured drink appears designed to attract the attention of a younger audience.

Further, the brand name 'Stiffy's' brings with it undoubtedly equivocal connotations, either based on an overtly sexual reference, or a comment about the alcoholic strength of the drink. We believe the link to sexuality, and obvious attempt to glamorise the strength to represent a breach of the Code."

COMPLAINANT

Molson Coors Brewing Company (UK) Ltd

DECISION

Under Code paragraph 3.2(a) and (h) **NOT UPHELD**
Under Code paragraph 3.2 (d) **UPHELD**

The company pointed out that the brand had been the subject of a complaint to the Portman Group in 2004. On that occasion, the Independent Complaints Panel had decided that the brand name in itself did not suggest an association with sexual success and that the brand packaging did not have a particular appeal to under-18s. The company said that in developing the brand since then it had made regular use of the Portman Group's Advisory Service and that the Advisory Service had raised no objection to the current bottle design in terms of colour, typeface, or the flavour name Kola Kubez. The company disputed that they had glamorised the strength of the drink and pointed out that, at 20% ABV, Stiffy's was approximately half the strength of vodka. They maintained, as they did in the 2004 complaint, that the brand name had been chosen because Stiffy was the nickname of a person involved in the development of the drink; it had not been chosen for its sexual connotations. The company argued at length that the packaging did not appeal particularly to under-18s. They claimed that kola kubez and jaffa cakes appealed to all ages, not just children and that it was clear from the relatively high price of the drink that they were not targeting under-18s. They submitted a number of other alcoholic drinks which, in their opinion, had names and/or packaging design elements that were more likely than their own product either to suggest sexual success or particularly appeal to under-18s.

The Panel first considered whether the brand name made the alcoholic strength a dominant theme. While acknowledging that a 'stiff' drink was understood to mean a strong drink, it considered that 'stiffy' did not have the same interpretation. It accordingly did not find the product in breach of Code paragraph 3.2(a).

The Panel then considered whether the brand name had associations with sexual success. It noted that the product had been subject to a similar complaint in 2004 and on that occasion the Panel had not upheld the complaint. The Panel, however, decided that, in view of the length of time that had since elapsed, it should not necessarily be bound by that precedent. The Panel considered it had to be responsive to changes in the prevailing climate in society and, in particular, to the more conservative attitudes that now existed towards alcohol promotion. The Panel noted that 'stiffy' was a common slang term for an erection and considered that the brand name therefore had strong sexual connotations; indeed, it noted that in the Panel's decision on the previous complaint the company had been criticised for playing on these connotations in some of its marketing activity. It therefore concluded that the brand name suggested an association with sexual success and accordingly found the product in breach of Code paragraph 3.2(d).

Finally, the Panel considered whether the product's packaging had a particular appeal to under-18s. It agreed with the company that Jaffa Cakes and Kola Kubez were popular with both adults and under-18s. The Panel acknowledged that the bottles were bright but considered that this alone did not lead the products to have a particular appeal to under-18s. Overall, it considered that the packaging was unlikely to appeal particularly to under-18s and it accordingly did not find the product in breach of Code paragraph 3.2(h).

ACTION BY COMPANY

The company, in consultation with the Portman Group's Advisory Service, has changed the brand name to Stivy's.

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
Stiffy's Jaffa Cake/Stiffy's Kola Kubez	November 2011	31 December 2011

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.



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.



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.



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.



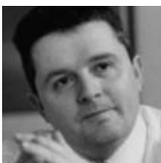
Jane Keightley

Jane Keightley has 16 years' marketing experience in the drinks industry, having held senior UK and global roles at International Distillers & Vintners UK and Diageo. Now freelance, she specialises in advising charities, corporate foundations and businesses on branding and communications strategies, including: The Diageo Foundation, The Princes Charities, Against Breast Cancer, Thrive, Street Kids International, The Alnwick Castle & Garden, CARE International UK, the British Hen Welfare Trust, Pub is The Hub and the Child Bereavement Charity.



Ron Finlay

Ron Finlay is a PR and public affairs consultant with a special interest in public health. He advised the Department of Health on its Know Your Limits alcohol campaign and has also worked in the fields of tobacco control and drug misuse. Over 25 years' experience in marketing and communications now running his own business. He has an MA in Economics and is a Fellow of the RSA.



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.

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



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