

The Annual Code Report 2008

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:

Bacardi-Martini; Beverage Brands (UK), Brown-Forman; Carlsberg UK; Coors Brewers UK; Diageo GB; Inbev UK; Pernod Ricard UK; and Scottish & Newcastle.

Foreword by the Portman Group Chief Executive, David Poley



2008 was an extremely challenging year for the drinks industry and the Portman Group. As scrutiny of the industry's social responsibility standards reached unprecedented levels, we went to great lengths to guarantee and promote the effectiveness of our Code.

Management consultants, PIPC, devised and implemented a rigorous audit of a randomly collected sample of 485 drinks' packaging against our Code. The audit process lasted for most of the year and sparked criticism from some quarters. Despite this, we believe it was worthwhile and that independent auditing should become a regular feature of our work.

The findings of the audit suggest that the overwhelming majority of drinks companies market their drinks in a socially responsible manner. PIPC considered that 93% of products were definitely compliant with the Code but they expressed reservations over the packaging of 32.

Producers of most of these drinks immediately volunteered to change their marketing to meet PIPC's concerns. In the case of ten products, however, the company opted to defend their marketing to the Independent Complaints Panel, the final arbiter of acceptability under the Code. Two of these products were ultimately found in breach of the Code.

The number of complaints made under Code remains low. Critics suggest this is because consumers do not know about our Code or how to complain. To address their concerns, we recently ran a series of national press ads and used direct mail to promote the Code.

Others take the view that a low number of complaints would be the logical outcome from the steps that we have taken to prevent potentially problematic products from hitting the shelves in the first place. In fact, our Code Advisory Service provided guidance on 250 drinks during the year, a record number, and furthermore offered unsolicited advice on several occasions.

One of the more unusual complaints over the year created some industry uncertainty. The Panel found in favour of Alcohol Concern by ruling that images uploaded by consumers on the WKD website were in breach of the Code. In the WKD case, the Panel decided that a company should apply the same strict

standards to "real situation" images on its website as it would to staged images in more conventional marketing. This means that, for example, companies should only display website images of consumers drinking alcohol if those consumers are, or look as if they are, over 25.

To clarify the situation, we issued an industry Help Note to give companies detailed, practical advice. However, the whole area of digital marketing is fraught with difficulty for brand-owners. Confusion can also occur because their products can sometimes be promoted in a totally inappropriate way by a third party. In many cases, the drinks company may be unable to prevent or even trace those responsible for such damaging brand associations.

Over the coming months we intend to publish a set of comprehensive guidelines to help companies navigate the digital minefield in a socially responsible way.

During the year, we continued to provide a strong voice for drinks producers, championing their social responsibility. It was pleasing that our good work was recognised by KPMG in its review of the industry's standards and that the International Harm Reduction Association named the Code among the fifty world-leading alcohol harm reduction initiatives.

Additionally, we argued hard to Government that there was no need to abolish our Code and replace it with a new mandatory Code for both retailers and producers. We argued that any perceived failings with retailers should be dealt with separately. It is pleasing that the Government has acknowledged the effectiveness of our work and decided to build new regulations around, rather than in place of, our Code.

And finally, I would like to thank Sir Richard Tilt and his Panel for their diligent approach to decision-making and my industrious team for their efforts.

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
February 2009

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



2008 was another year of close scrutiny of the alcohol industry by both the Government and the media. Mandatory regulation is now likely to be introduced for alcohol retailers but the Government seems likely to conclude that the Portman Group arrangements based on the Code and the Independent Panel are suitably robust in respect of alcohol producers.

This, I think, confirms the credibility of the Code and complaints procedure that the Portman Group has put in place. The Independent Panel plays an important part in this; both in dealing with potential individual breaches of the Code and in setting the overall standards for the industry. The Panel guards its independence fiercely and will continue to do so. All the Panel members are strong contributors from a variety of backgrounds who have a track record of reaching balanced and proportionate decisions.

In my report last year I welcomed the Portman Group's plan to carry out an independent audit of compliance with the Code. This was duly carried out by PIPC and the Portman Group has reported on it. In summary, it demonstrated a very good level of compliance. Under arrangements agreed with the Panel the auditors were able to refer any products they considered in breach to the Panel as a complaint. The producers were given four months to take corrective action before the Panel considered the complaint. In the event the Panel ultimately considered 10 such complaints.

As a result of this, the total number of complaints this year (21) was considerably higher than last year. The complaints ranged across the drink sectors, comprising beers (11), ciders (3), ready to drink products (6) and spirits (1). One of these complaints related to the product's website while the rest concerned naming and packaging. The Panel upheld 8 of the 21 complaints.

The website complaint prompted the Portman Group to write a help note for the industry on images of promotional staff and consumers in marketing material.

Towards the end of the year a number of complaints against products from two small Scottish breweries (Brewdog Ltd and Sinclair Breweries Ltd) attracted a good deal of publicity, much of it critical of the Portman Group and its Code. I think the Panel's decisions have made it clear that we will continue to take a balanced and reasoned approach based on the evidence before us.

I expect 2009 to be another challenging year and applaud the Portman Group for their recent Christmas press campaign to help raise awareness of the complaints process. The Panel will continue to support the Code to ensure compliance levels are high and marketing is responsible.

Finally thanks to all the Panel members and a particular thanks goes to Morven Proctor who has completed six years as a member, bringing very valuable experience of students in the higher education sector. As always we have been very well supported by the Portman Group secretariat.

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
February 2009



Dorothy Goodbody's Wholesome Stout

Wye Valley Brewery

Final Decision: 25th February 2008

COMPLAINT SUMMARY

"In my view the drawing of a young woman, whose dress is pulled back to reveal her thighs (whilst also hinting at a lack of undergarments) is sexually suggestive and contravenes both the spirit and letter of 3.2(d)."

COMPLAINANT

Alcohol Concern

DECISION

Under Code paragraph 3.2(d) **NOT UPHOLD**

The company said that the label image, featuring a drawing of a young woman, was intended to capture the spirit of fun and innocence of 1950's rural Herefordshire. They believed the young woman was sitting down holding her knees in an innocent fashion and the complainant's suggestion that she might not be wearing any underwear indicated that the complainant's imagination had got the better of them.

The Panel considered that the woman's pose and expression were mildly sexually provocative and that the image was therefore slightly saucy, in the style of a seaside postcard. It also considered that the name "Goodbody" had a mild sexual connotation. It noted, however, that the name also had relevance to the nature of the drink. It saw no reason to assume that the young woman was not wearing any underwear. Overall, it considered that because the image was only a drawing rather than a real person and the sexual connotations were so mild, the label did not suggest any association with sexual success. Accordingly, it did not find the product in breach of Code paragraph 3.2(d).

ACTION BY COMPANY

None needed.



'Mugshots' section of WKD website

Beverage Brands (UK)

Final Decision: 28th March 2008

COMPLAINT SUMMARY

"I write to draw your attention to the 'Mugshots' section of the WKD website. This online facility allows people who have attended one of the events WKD sponsors in multiple cities to see if they have been featured, and crucially, to send that photo to their online networks. Invariably, those in featured photographs are holding a WKD product. In my view this facility contravenes both 3.2d (sexual success) and 3.2e (social success)."

COMPLAINANT

Alcohol Concern

DECISION

Under Code paragraphs 3.2(d), 3.2(e), 3.2(f) and 3.2(i)

UPHELD

The company said they strived to ensure all their communications, including digital, were responsible. To this end they had voluntarily developed both a company Code of Conduct and, specifically, a company Digital Code of Conduct that went beyond the requirements placed on them by other regulations, such as the Portman Group's Code. They said all images displayed on the website were pre-vetted by the marketing team to ensure that they were decent and responsible. They pointed out that the photographs highlighted by the complainant featured male and female promotional staff as well as consumers. They asserted that all promotional staff were issued with the company Code of Conduct and were briefed on the importance of social responsibility, including the importance of not approaching customers who appeared drunk or underage. They denied that there was any sexual success link between the promotional staff and the consumer but argued that the images instead portrayed fun and enjoyment. They acknowledged that some of the photographs showed groups of friends but argued that this was how their consumers tended to socialise; they thus disputed that showing a photo of friends implied that drinking could lead to social success, particularly as not everyone in the photographs was shown drinking.

The Panel noted the company's comments but was nonetheless concerned about several aspects of the various photographs highlighted by the complainant.

The Panel noted that the promotional staff were young and attractive. It also noted there was physical contact between the promotional staff and the consumer; for example, they sometimes had their arms around one another or, in one case, a female promoter was sitting on a male consumer's knee. In some cases, the consumers were responding in suggestive ways, for example by putting their tongue out towards the promotional staff member. The Panel considered that by offering consumers the opportunity to be closely associated in a photograph with attractive promotional staff, the promotional activity and subsequent display on the website was suggesting an association between the product and sexual success. It therefore found the website in breach of Code paragraph 3.2(d).

The Panel also noted that several of the photographs showed groups posing for the camera while drinking WKD. In some cases, these groups would be huddled together and/or would be 'playing up' for the camera with funny faces and poses. The Panel considered that the invitation to pose for a photograph in a licensed venue was likely to cause this reaction. It was concerned, however, that the effect was to imply close bonding, popularity and a good time, all very closely linked to the WKD brand. While it was acceptable to portray drinking as sociable, the Panel considered that some of the photographs, because of the above elements, went further and suggested that consumption of WKD could lead to social success and popularity. Accordingly, it found the website in breach of Code paragraph 3.2(e).

The Panel further noted that while there was no definite indication of drunkenness in the photographs, there were ambiguous images which might indicate drunkenness. For example, in one of the photographs, a young man was shown standing with his arm around a friend and his head slumped forward. In other

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photographs, there were people displaying a lack of inhibition. The Panel acknowledged that this might be inspired by a desire to 'play up' for the camera rather than caused by excessive drinking but nonetheless considered that the ambiguity meant some photographs encouraged immoderate consumption. It therefore found the website in breach of Code paragraph 3.2(f).

Finally, the Panel noted that Code paragraph 3.2(i) requires that a drink's packaging and promotional material should not incorporate images of people who are, or look as if they are, under the age of 25 (unless there is no suggestion that they have just consumed, are consuming or are about to consume alcohol). This rule is to protect the industry against accusations that it is in any way seeking to appeal to under-18s. While the Panel had previously considered this rule

in the context of models used on packaging or in promotional material, it saw no reason why it should not apply also to images of 'real' people. The Panel noted that many of the people in the photographs appeared to be under the age of 25. While the Panel did not object under the spirit of the Code to the employment of promotional staff aged under 25 (provided that they were aged over 18), it considered that displaying images of customers apparently aged under 25 in promotional material was in breach of the Code. It therefore found the website in breach of Code paragraph 3.2(i).

ACTION BY COMPANY

In light of the Panel's decision, the company agreed to remove the 'Mugshots' section from the website.



Kestrel Super

Wells & Young's Brewing Company

Final Decision: 8th July 2008

COMPLAINT SUMMARY

"Anyone consuming the content of a can of 500ml super-strength lager is drinking 4.5 units of alcohol and is exceeding the government's suggested safe-drinking limits. Our contention is therefore that, by producing alcohol of this strength in 500ml cans, the producers are infringing the Code of Practice under 3.2(f) by encouraging immoderate consumption and encouraging binge drinking and drunkenness. Clearly, the fact that the cans are not re-sealable indicates that the expectation is that the contents of the can must be drunk within a limited time-period and cannot be stored to be consumed at a later date. Furthermore, the reality is these drinks are not shared between people and are almost always drunk by a single individual."

COMPLAINANT

Thames Reach

DECISION

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

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

The company maintained that the product was brewed to be enjoyed in moderation. They asserted that, in the end, drinking behaviour was an issue of personal responsibility; if someone was drinking irresponsibly, changing the strength of a drink or size of its container would not address the cause of their misuse and thus was unlikely to change their behaviour.

The Panel noted that the government's advice on sensible drinking was expressed as guidelines rather than strict limits and that these guidelines stated that men should not regularly exceed 3 to 4 units of alcohol a day. The Panel further noted that lower guidelines existed for women. The Panel considered that the phrasing of the government's advice raised questions

over the rationality of treating four units of alcohol as a threshold of responsibility. The Panel further noted that a number of drinks containers had considerably more than four units of alcohol, for example bottles of wine and large plastic bottles of cider, and often these containers were not easily re-sealable and/or their contents might degrade if not consumed in two or three days. The Panel considered it was difficult to make a reasonable and objective distinction on responsibility grounds between a can of strong lager and these other types of drinks container. While acknowledging the complainant's concern, the Panel concluded that using the Code to restrict container size in this way was inappropriate and liable to lead to inconsistencies. The Panel therefore decided to not uphold the complaint under Code paragraph 3.2(f).

The Panel, however, expressed concern over the way in which the product's packaging placed emphasis on its alcoholic strength. It noted that the word "Super" was prominently displayed across the front of the can immediately above the word "strength" so that the two were read in conjunction with one another. It further noted that the description "very strong lager" featured on the front of the can. In addition, it noted that references to strength appeared, albeit with less prominence, in several other places on the can. It considered that these textual references were reinforced by the prominent, stern image of a kestrel on the can's front. The Panel considered that these textual references and the image, in combination, served to make strength the dominant theme of the packaging. It accordingly found the product in breach of Code paragraph 3.2(a).

ACTION BY COMPANY

The company agreed to consult the Portman Group's Advisory Service for guidance on appropriate changes to the packaging.



Carlsberg Special Brew

Carlsberg UK

Final Decision: 8th July 2008

COMPLAINT SUMMARY

"Anyone consuming the content of a can of 500ml super-strength lager is drinking 4.5 units of alcohol and is exceeding the government's suggested safe-drinking limits. Our contention is therefore that, by producing alcohol of this strength in 500ml cans, the producers are infringing the Code of Practice under 3.2(f) by encouraging immoderate consumption and encouraging binge drinking and drunkenness. Clearly, the fact that the cans are not re-sealable indicates that the expectation is that the contents of the can must be drunk within a limited time-period and cannot be stored to be consumed at a later date. Furthermore, the reality is these drinks are not shared between people and are almost always drunk by a single individual."

COMPLAINANT

Thames Reach

DECISION

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

The company pointed out that the government's advice on sensible drinking was expressed as guidelines rather than strict limits and that these guidelines stated that men should not regularly exceed 3 to 4 units of alcohol a day. They also pointed out that lower guidelines existed for women and argued that this cast even more doubt on the wisdom of using the government guidelines to determine packaging size. The company considered that the complaint was

based on the assumption that consumers' drinking behaviour was controlled by pack size, pack type and its ease of re-sealing; they disputed that this was the case. They asserted that containers with less alcohol were often drunk in multiples resulting in excess consumption. They further noted that a number of drinks containers had considerably more than four units of alcohol and in some cases, corked bottles of wine for example, these containers were not designed to be re-sealed. They pointed out that their packaging clearly indicated that the product contained 4.5 units of alcohol to enable consumers to make informed decisions about their drinking behaviour. They disputed that the intent of the Code was to regulate well-established packaging sizes.

The Panel agreed that the phrasing of the government's advice raised questions over the rationality of treating four units of alcohol as a threshold of responsibility. They also considered it was difficult to make a reasonable and objective distinction on responsibility grounds between a can of strong lager and other types of drinks container holding in excess of four units. While acknowledging the complainant's concern, the Panel concluded that using the Code to restrict container size in this way was inappropriate and liable to lead to inconsistencies. The Panel therefore decided to not uphold the complaint.

ACTION BY COMPANY

None needed.



Tennent's Super

Inbev UK

Final Decision: 8th July 2008

COMPLAINT SUMMARY

"Anyone consuming the content of a can of 500ml super-strength lager is drinking 4.5 units of alcohol and is exceeding the government's suggested safe-drinking limits. Our contention is therefore that, by producing alcohol of this strength in 500ml cans, the producers are infringing the Code of Practice under 3.2(f) by encouraging immoderate consumption and encouraging binge drinking and drunkenness. Clearly, the fact that the cans are not re-sealable indicates that the expectation is that the contents of the can must be drunk within a limited time-period and cannot be stored to be consumed at a later date. Furthermore, the reality is these drinks are not shared between people and are almost always drunk by a single individual."

COMPLAINANT

Thames Reach

DECISION

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

The company informed the Panel that they had already announced that, after careful consideration, they had decided to discontinue producing the product in 500ml cans and were about to move to 440ml cans instead. They believed that this addressed the complainant's concern.

The Panel noted that the government's advice on sensible drinking was expressed as guidelines rather than strict limits and that these guidelines stated that men should not regularly exceed 3 to 4 units of alcohol a day. The Panel further noted that lower guidelines existed for women. The Panel considered that the phrasing of the government's advice raised questions over the rationality of treating four units of alcohol as a threshold of responsibility. The Panel further noted that a number of drinks containers had considerably more than four units of alcohol, for example bottles of wine and large plastic bottles of cider, and often these containers were not easily re-sealable and/or their contents might degrade if not consumed in two or three days. The Panel considered it was difficult to make a reasonable and objective distinction on responsibility grounds between a can of strong lager and these other types of drinks container. While acknowledging the complainant's concern, the Panel concluded that using the Code to restrict container size in this way was inappropriate and liable to lead to inconsistencies. The Panel therefore decided to not uphold the complaint. The Panel nonetheless welcomed the voluntary action of the company to reduce the can size to 440ml.

ACTION BY COMPANY

None needed.



Skol Super

Carlsberg UK

Final Decision: 8th July 2008

COMPLAINT SUMMARY

"Anyone consuming the content of a can of 500ml super-strength lager is drinking 4.5 units of alcohol and is exceeding the government's suggested safe-drinking limits. Our contention is therefore that, by producing alcohol of this strength in 500ml cans, the producers are infringing the Code of Practice under 3.2(f) by encouraging immoderate consumption and encouraging binge drinking and drunkenness. Clearly, the fact that the cans are not re-sealable indicates that the expectation is that the contents of the can must be drunk within a limited time-period and cannot be stored to be consumed at a later date. Furthermore, the reality is these drinks are not shared between people and are almost always drunk by a single individual."

COMPLAINANT

Thames Reach

DECISION

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

The company pointed out that the government's advice on sensible drinking was expressed as guidelines rather than strict limits and that these guidelines stated that men should not regularly exceed 3 to 4 units of alcohol a day. They also pointed out that lower guidelines existed for women and argued that this cast even more doubt on the wisdom of using the government guidelines to determine packaging size. The company considered that the complaint was

based on the assumption that consumers' drinking behaviour was controlled by pack size, pack type and its ease of re-sealing; they disputed that this was the case. They asserted that containers with less alcohol were often drunk in multiples resulting in excess consumption. They further noted that a number of drinks containers had considerably more than four units of alcohol and in some cases, corked bottles of wine for example, these containers were not designed to be re-sealed. They pointed out that their packaging clearly indicated that the product contained 4.5 units of alcohol to enable consumers to make informed decisions about their drinking behaviour. They disputed that the intent of the Code was to regulate well-established packaging sizes.

The Panel agreed that the phrasing of the government's advice raised questions over the rationality of treating four units of alcohol as a threshold of responsibility. They also considered it was difficult to make a reasonable and objective distinction on responsibility grounds between a can of strong lager and other types of drinks container holding in excess of four units. While acknowledging the complainant's concern, the Panel concluded that using the Code to restrict container size in this way was inappropriate and liable to lead to inconsistencies. The Panel therefore decided to not uphold the complaint.

ACTION BY COMPANY

None needed.



Mega White Cider

The Original Cider Company

Final Decision: 25th July 2008

COMPLAINT SUMMARY

"The prominence of MEGA and the emphasis on 'High Strength' would be caught by the Code."

COMPLAINANT

National Association of Cider Makers

DECISION

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

The company said that the brand had been on the market for a number of years without attracting complaint. They offered to delete the words "Mega strength" from the label and add the words "drink responsibly".

The Panel did not object to the brand name "Mega White" but considered that the references to "mega strength" made the product's alcoholic strength the dominant theme of the packaging. Accordingly, it decided to uphold the complaint under Code paragraph 3.2(a) but welcomed the remedial action proposed by the company.

ACTION BY COMPANY

The company agreed to remove references to "mega strength" from the drink's packaging and to add responsibility information.



Blackout Cider

The Original Cider Company

Final Decision: **25th July 2008**

COMPLAINT SUMMARY

"This product is in clear breach of section 3.2(a) for the above reasons re: 'the intoxicating effect'."

COMPLAINANT

National Association of Cider Makers

DECISION

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

The company said that the brand had been on the market for a number of years without attracting complaint. They stated that the brand name was created to celebrate the eclipse of the sun, hence the picture of the sun on the label. Their preferred brand

name of Eclipse had already been registered as a trademark by another company and they therefore had chosen Blackout as an alternative.

The Panel considered that, particularly in the context of a relatively strong cider, the name Blackout carried strong connotations of the drink's potential effect on the consumer, i.e. alcohol-induced unconsciousness, and was therefore very unwise. Accordingly, it decided to uphold the complaint under Code paragraph 3.2(a).

ACTION BY COMPANY

The company said it would re-launch the product under a new brand name.



Moonshine White Cider

The Original Cider Company

Final Decision: 25th July 2008

COMPLAINT SUMMARY

"This would be caught by failure to comply with the spirit of the Code, enshrined in Section 1.6 of the Code which seeks to ensure that alcohol is promoted in a socially responsible manner."

COMPLAINANT

National Association of Cider Makers

DECISION

Code Paragraphs: 3.2(a) 3.2(f) **NOT UPHELD**

The company said that the brand had been on the market for a number of years without attracting complaint. They asserted that Moonshine was another word for moonlight. They offered to delete the words "extra strong" from the label and add the words "drink responsibly".

The Panel considered that the brand name was a clear reference to illegally produced alcohol. It considered, however, that this did not necessarily imply that the alcohol was especially strong, nor that the packaging, even before the company's offered amendments, placed undue emphasis on alcoholic strength. Accordingly, it decided to not uphold the complaint under Code paragraph 3.2(a).

The Panel further considered that though the brand name clearly alluded to illegally produced alcohol, this did not encourage illegal or immoderate consumption. Accordingly, it decided to not uphold the complaint under 3.2(f).

ACTION BY COMPANY

None needed.



Red Square Reloaded

Halewood International Ltd

Final Decision: 22nd August 2008

COMPLAINANT

"The product is really badly labelled and it is very hard to see that there is alcohol in it."

COMPLAINANT

Member of the public, London

DECISION

Under Code paragraph 3.1 **UPHELD**

The company maintained that the packaging featured clear and explicit references to vodka as well as implicit references to the alcoholic content such as a statement that the product was not for sale to under-18s.

The Panel noted these references but considered that they were mostly in fairly small print on the side of the packaging. It considered that the alcoholic nature should be displayed more prominently and was concerned that consumers might mistake the product for a soft drink. It therefore upheld the complaint under Code paragraph 3.1.

ACTION BY COMPANY

The company agreed to amend the product's packaging to communicate its alcoholic nature more clearly.



O.T.T. (Old Tongham Tasty)

Hogsback Brewery

Final Decision: 12th September 2008

COMPLAINANT

"Text on the side of the label reads "go over the top", which can be interpreted as encouraging immoderate consumption."

COMPLAINANT

PIPC (following audit of Code compliance)

DECISION

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

The company said that OTT, as well as standing for Old Tongham Tasty, was commonly used as an abbreviation for the expression "over the top"; the label statement "Go over the top" was a reference to this.

They maintained, however, that the phrase in this context was simply a reference to the full taste of the beer rather than an incitement to irresponsible drinking behaviour. The Panel noted that the phrase featured with no great prominence on the side of the bottle and considered that there was nothing else on the label that implied immoderate or irresponsible consumption. It considered that the use of the phrase was unlikely to encourage irresponsible consumption and accordingly did not uphold the complaint.

ACTION BY COMPANY

None needed.



Brewster's Bundle

Hogsback Brewery

Final Decision: 12th September 2008

COMPLAINT SUMMARY

"The front label has a prominent image of a cartoon baby which could appeal to under-18s."

COMPLAINANT

PIPC (following audit of Code compliance)

DECISION

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

The company explained that the product was produced to commemorate the birth of the lady brewer's baby. They doubted that the cartoon image

of the baby would appeal to under-18s. The Panel concurred that the image, in context, was unlikely to have a particular appeal to this age group and accordingly did not uphold the complaint.

ACTION BY COMPANY

None needed.



ShotPak

Pouch Group (imported by Chilling Rocks Beverages Ltd)

Final Decision: 13th October 2008

COMPLAINT SUMMARY

"The name of this product suggests it is a "shot" which I understood is generally expected to be either a 25ml or 35ml quantity of alcoholic drink ... The packaging would need to set out very clearly the number of units in the drink."

"This product contains a 'double measure' which appears likely to be more than two units. It is also, the point is made below, designed to be drunk in one go. For women, it is likely that drinking two of these products in one two hour period would of itself constitute binge drinking."

"A "shot" is generally understood to be a quantity of drink that is drunk in one go, so the name "ShotPak" is in itself not helpful. In addition, the nature of the packaging makes it harder to handle than a bottle. It is notable that the other main type of drinks packaged in this way – fruit juices for children's lunch boxes – are designed to be drunk in one go."

"It also appears that the product is targeted especially at younger people ... The only drink product I can think of which is packaged the same way are some pouches of fruit juice which young people have in packed lunch boxes."

COMPLAINANT

Sally Keeble MP

DECISION

Under Code paragraph 3.1, 3.2(f), 3.2(g) and 3.2(h)
UPHELD

The company explained that they were importing the product from the USA. The product was packaged in 50ml sachets and these, in turn, were packaged in boxes of six sachets. There were two formats. First, there was a pre-mixed vodka version with an ABV of 17% marketed primarily as "ShotPak". This came in four flavours named Apple Sour, Lemon Drop, Purple

Hooter and Kamikaze. Secondly, there was a full-strength spirit version with an ABV of 40% marketed primarily as "STR8UP" but also featuring "ShotPak" branding. This also came in four varieties: vodka, rum, tequila and whisky. The box of six sachets was intended to retail at £14.95.

The company maintained that the packaging made the alcoholic nature clear. The Panel, however, was concerned that the novel packaging meant that consumers would not expect the sachets to contain alcohol. It was particularly concerned that, in respect of the pre-mixed version, the sachets featured images of fruit that might reinforce the impression that this was a soft drink. In view of these factors, it considered that the alcoholic nature needed to be made clearer and accordingly found the packaging in breach of Code paragraph 3.1.

The company denied that the packaging urged the consumer to drink rapidly or down-in-one. They stated that the sachet could stand up on its base and did not therefore need to be consumed all at once. They further maintained that the term "shot" simply denoted a measurement of drink, in this case 50ml. The Panel noted that the product was marketed as "The shot without a glass", thus encouraging the consumer to consume directly from the sachet. It noted the sachet could not be re-sealed once opened and considered that the soft packaging did not lend itself easily to being set down. It considered that it would be difficult for the consumer to do anything other than down the contents in one go and that, in this context, the names "ShotPak" and "STR8UP" were likely to be seen as encouraging that style of consumption. It considered that the nature of the packaging in combination with the textual references meant that overall the packaging was therefore urging rapid or down-in-one consumption and accordingly found it in breach of Code paragraph 3.2(g).

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The company disputed that the packaging encouraged illegal, irresponsible or immoderate consumption. They said that the product's portability made it suitable, for example, for people going to the beach or attending sporting events. The Panel considered that the product's portability and ease of concealment meant that it might appeal to people who wanted to drink surreptitiously or to smuggle alcohol into places where drinking wasn't allowed, for example schools, but considered it was unreasonable to object to the packaging format on these grounds alone. The Panel considered, however, that the packaging was urging down-in-one consumption (see above) and was concerned that, given the full-strength version contained two units of alcohol per pouch, this could quickly lead to drunkenness. The Panel therefore considered that the packaging did encourage irresponsible and immoderate consumption and accordingly found it in breach of Code paragraph 3.2(f).

The company said that the product was aimed at people aged 25–45 and was priced accordingly. They stated that the packaging format offered various advantages, including in terms of portability and the environment. The Panel, however, was concerned that the sachets were similar in format to those that contained soft drinks aimed at children. It also

considered that the ease of concealment would appeal to under-18s who wanted to drink in prohibited situations. While the Panel considered that these concerns did not necessarily prohibit this packaging format altogether under the Code, it considered that this appeal to under-18s was exacerbated in the case of the pre-mixed versions by the colourful packaging and attractive-sounding flavour names such as Purple Hooter and Lemon Drop. In the case of the full-strength version, it considered this appeal was exacerbated by the use of the text-style abbreviation in the name "STR8UP". It therefore found that the packaging appealed particularly to under-18s and accordingly found the product in breach of Code paragraph 3.2(h).

Finally, the Panel noted that one of the pre-mixed sachets was named "Kamikaze". The Panel considered that this carried implications of self-destruction and would be seen as an invitation to drink excessively. It accordingly regarded this flavour name, in itself, as in breach of Code paragraph 3.2(f).

ACTION BY COMPANY

The company agreed to consult the Portman Group's Advisory Service for guidance on appropriate changes to the packaging.



Red Square Reloaded

Halewood International Ltd

Final Decision: 5th December 2008

COMPLAINT SUMMARY

"The word 'loaded' or 'reloaded' are terms used for drinking to excess or types of drug using methods."

COMPLAINANT

PIPC (following audit of Code compliance)

DECISION

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

The company said that the name of the product had changed from Red Square Energising to Red Square Reloaded eight years ago following a change in the Portman Group's Code. Advice had been sought on the name at the time from the Portman Group's Advisory Service. The company denied that the word "reloaded" carried connotations of drinking to

excess or of illicit drugs. They submitted the details of both quantitative research among 18–24 year old consumers and lexicographical research which they had commissioned and the results of which supported their case. They furthermore cited various examples of the usage of the word "reloaded" obtained through internet searches and which differed significantly from the interpretation that had been put on the word by the complainant.

The Panel considered that the brand name was unlikely to be seen by consumers as referring to excessive drinking or illicit drug use. It accordingly did not uphold the complaint.

ACTION BY COMPANY

None needed.



Monte Alban

Constellation Spirits Inc (trading as Barton Brands Ltd)

Final Decision: **5th December 2008**

COMPLAINT SUMMARY

"Most written information on the bottle is in Spanish, and insufficient English is present to confirm it is an alcohol product, aside from a detachable label."

COMPLAINANT

PIPC (following audit of Code compliance)

DECISION

Under Code paragraph 3.1 **NOT UPHOLD**

The company said that, after reviewing the product's packaging in light of the complaint, they had decided to make certain changes to make the alcoholic nature clearer. These changes were to revise the format and positioning of the statement of alcoholic strength on the front label and to include the caption "Contains alcohol" on the back label. These changes would be in effect by the end of December 2008.

The Panel noted the company's action. It considered, however, that the original label (i.e. the version that was subject to the complaint) already made the product's alcoholic nature sufficiently clear in that, although the textual references to alcohol were not particularly prominent, the overall design and presentation of the drink was very suggestive that it contained alcohol. It nonetheless welcomed the company's action to reinforce this message. It accordingly did not find the product's packaging in breach of Code paragraph 3.1.

ACTION BY COMPANY

None needed.



Skull Splitter

Sinclair Breweries Ltd

Final Decision: 5th December 2008

COMPLAINT SUMMARY

"The name 'Skull Splitter' implies both violence and also the impact the strength may have on the drinker. Additionally there is a picture which could be seen to reinforce the aggressive theme."

COMPLAINANT

PIPC (following audit of Code compliance)

DECISION

Under Code paragraph 3.2(a) and 3.2(b)

NOT UPHeld

The company said that the brand had been in existence since the creation of the Orkney Brewery almost twenty years ago. The brand took its name from Thorfinn Einarsson, the 7th Viking Earl of Orkney, whose nickname was Skull Splitter; this was explained on the product's back label. They maintained that the product was marketed responsibly to real ale connoisseurs and there was no evidence of the product ever being associated with harmful consumption. They submitted various press articles and letters they had received from third parties which expressed support

for their brand and urged rejection of the complaint since news of the complaint investigation had leaked.

The Panel noted that the label featured the brand name "Skull Splitter" below an image of an aggressive-looking Viking leaning on an axe. It understood the complainant's concern that this was inappropriately associating the product with violence and aggression and furthermore was emphasising the strength and intoxicating effect of the drink which, at 8.5% ABV, was relatively strong. The Panel, however, noted that the name and image were not gratuitous but had a relevance to the company's heritage. It further considered that the historical theme of the label meant that the name and image were not likely to conjure up associations with modern day violence and aggression in the minds of the public. In light of this, and in the context of the nature of the product, the Panel concluded that the product's name and packaging were not in breach of the spirit of the Code. It accordingly did not uphold the complaint.

ACTION BY COMPANY

None needed.



Punk IPA

Brewdog Ltd

Final Decision: 5th December 2008

COMPLAINT SUMMARY

"This product is described on the label as an "aggressive beer" thus associating its consumption with anti-social behaviour."

COMPLAINANT

PIPC (following audit of Code compliance)

DECISION

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

The company claimed that the phrase "this is an aggressive beer" described a flavour characteristic of the product, i.e. a dry bitterness which was aggressive on the pallet. The Panel considered that when the phrase was read in context it was clear that it referred to the taste of the product. The Panel accordingly did not find the product's packaging to be in breach of the spirit of the Code.

ACTION BY COMPANY

None needed.



Hop Rocker

Brewdog Ltd

Final Decision: 5th December 2008

COMPLAINT SUMMARY

"Description of the product includes "nourishing food stuff" and "magic is still there to be extracted from this drink" implying it could enhance mental or physical capabilities."

COMPLAINANT

PIPC (following audit of Code compliance)

DECISION

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

The company denied that the label carried the implication alleged by the complainant. The Panel noted that the challenged text was contained in a light-hearted description of the history of beer and of the company's aspirations. The Panel considered that, in this context, the text in question was unlikely to be taken literally. The Panel accordingly did not find the product's packaging to be in breach of the spirit of the Code.

ACTION BY COMPANY

None needed.



Riptide

Brewdog Ltd

Final Decision: 5th December 2008

COMPLAINT SUMMARY

"The product is described as a "twisted merciless stout" associating its consumption with anti-social behaviour."

COMPLAINANT

PIPC (following audit of Code compliance)

DECISION

Under Code paragraph 3.2(b) **NOT UPHOLD**

The company claimed that the name and label text were based on a pirate and nautical theme and that the description "twisted merciless stout" was in keeping with that pirate theme. The Panel considered that the term was likely to be seen as harmless hyperbole and not in breach of the spirit of the Code. The Panel accordingly did not uphold the complaint.

ACTION BY COMPANY

None needed.



Big Beastie

Inver House Distillers

Final Decision: 5th December 2008

COMPLAINT SUMMARY

"The striking colours of the bottle and the spider and web imagery is childlike and is considered to have a particular appeal to under 18s."

COMPLAINANT

PIPC (following audit of Code compliance)

DECISION

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

The company said that, after a similar complaint against this product's packaging had been upheld in 2006, they had liaised with the Portman Group's Advisory Service to amend the packaging. In February 2006, the company had received confirmation from the Advisory Service that, in its opinion, the amended packaging was compliant with the Code. This amended packaging was still in use. The company denied that this packaging would appeal particularly to under-18s and argued that many other wine and spirit

bottles adopted equally striking colours. They noted that neither the original nor the current complaint emanated from a member of the public despite the product's widespread distribution.

The Panel acknowledged the company's actions following the previous complaint. It nonetheless considered that the changes made were insufficient to overcome its concerns under the Code. It considered that the garish colours, coupled with the childish outline of a spider and its web, would still cause the product to appeal particularly to under-18s. It therefore found the product's packaging in breach of Code paragraph 3.2(h).

ACTION BY COMPANY

The company said that, in light of the Panel's decision, they would remove the product from sale voluntarily and that stock should be exhausted by the end of February 2009.



Red Star Plus

Intercontinental Brands (ICB) Ltd

Final Decision: 14th January 2009

COMPLAINT SUMMARY

"There is no mention of alcohol on the front of this product and the language on the labelling makes it difficult to also confirm it is an alcohol product."

COMPLAINANT

PIPC (following audit of Code compliance)

DECISION

Under Code paragraph 3.1 **UPHELD**

The company said that the product had been amended prior to the complaint being made so that the alcoholic strength statement of "4% vol" had been added to the neck and face labels. They furthermore stated that the product was primarily for export.

The Panel considered that, even after the amendment, the packaging did not make the product's alcoholic nature sufficiently clear. It accordingly upheld the complaint under Code paragraph 3.1.

ACTION BY COMPANY

The company agreed to amend the label in consultation with the Portman Group's Advisory Service.

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
Mega White	August 2008	26 September 2008
Kestrel Super	August 2008	26 September 2008
Blackout	August 2008	26 September 2008
Red Square Reloaded	August 2008	15 November 2008
ShotPak	October 2008	24 December 2008
Red Star Plus	February 2009	9 April 2009

How to make a complaint under the Code

Details of the complaints process are given 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 inappropriate images of people 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, 7-10 Chandos Street, London W1G 9DQ**.

If you would like to discuss any aspect of the complaints procedure, you are welcome to telephone **020 7907 3700**. Alternatively you can send an email to 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 7907 3700. 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

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.



Callum Jacobs

Head of Personal, Citizenship and Health Education and also teacher of sociology and psychology at Cophthall School, a comprehensive secondary school in Barnet, London. Worked with Barnet Local Education Authority producing drug education resources for schools. Currently works with young people, specialising in drug and alcohol education.



Nigel Long

Non-executive advisor to Naked (communications strategy company), Partners Andrews Aldridge (relationship marketing company) and Harringtons. Previously 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. After 10 years, and having successfully completed the merger of Partners BDDH and Euro RSCG (to create the UK's 6th largest ad agency), Nigel left in March 2004 and took a six month sabbatical.

Panel members continued overleaf...

The Independent Complaints Panel



Barbara O'Donnell

Appointed National Alcohol Liaison Officer for Scotland in February 2002 with a remit to administer the Scottish Association of Alcohol Action Teams (now the Scottish Association of Alcohol and Drug Action Teams). Prior to this appointment Barbara managed the Scottish Executive and Health Scotland's public education campaign, Drinkwise, for five years. Currently a member of the Education Core Group of the International Council on Alcohol & Addictions.



Reverend Canon Professor Martin Percy

Principal of Ripon College Cuddesdon, Oxford. Also visiting Professor of Theology and Ministry, Hartford Seminary, Connecticut; Professor of Theological Education, King's College, London and Canon Theologian, Sheffield Cathedral. Since his ordination in 1990 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. 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.



Morven Proctor (until December 2008)

Welfare Advisor at Liverpool John Moores' University Student Union. Former Women's Officer, National Union of Students Scotland. Former Vice-President (Welfare), Stirling University Students' Association.



Angela Sarkis CBE

An independent consultant with wide experience of voluntary organisations, the public sector, faith communities and charitable trusts. A BBC Governor since October 2002. Chairs the National Council for Voluntary Organisations Diversity Project and is a member of the Home Office Active Community Unit Advisory Panel and the Vice-President of the African Caribbean Evangelical Alliance. Currently a non-executive director on the Home Office Correctional Services Board. Former Chief Executive of the Church Urban Fund 1996–2002.

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 7907 3700** 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
Adnams plc	Frederic Robinson Ltd	Merrydown plc
Alcohols Ltd	Fuller Smith & Turner plc	Miller Brands (UK) Ltd
Ampleforth Abbey Trading Ltd	G T News Ltd	Mitchells & Butlers plc
Arkell's Brewery Ltd	GBL International Ltd	Mitchells of Lancaster (Brewers) Ltd
ASDA Stores Ltd	George Bateman & Son Ltd	MOB Ltd
Association of Licensed Multiple Retailers	Gin & Vodka Association of Great Britain, The	National Association of Cider Makers, The
Avery's of Bristol Ltd	Gray & Sons (Chelmsford) Ltd	Nisa-Today's (Holdings) Ltd
Babco Europe Ltd	Greene King plc	Northern Ireland Drinks Industry Group
Bacardi Martini	Greenwich Distillers Ltd	Oddbins Ltd
Belhaven Brewery Co Ltd, The	H&A Prestige Packing Company Ltd	Palmer & Harvey McLane Ltd
Beverage Brands (UK) Ltd	Halewood International Ltd	Pernod Ricard UK
Black Sheep Brewery plc, The	Hall & Woodhouse Ltd	Punch Taverns
Blackwood Distillers	Harvey & Sons (Lewes) Ltd	Rank Group
Blavod Drinks Ltd	Hayman Ltd	Reformed Spirits Company, The
Booker plc	Heavitree Brewery plc, The	Refresh UK
British Beer & Pub Association	Hook Norton Brewery Co. Ltd	Rubicon Research Ltd
Brothers Drinks Co. Ltd	Hyde's Brewery Ltd	S A Brain & Co. Ltd
Brown Forman	Ian Macleod Distillers Ltd	Scotch Whisky Association, The
Bulmers Ltd	Icon Distillers UK	Scottish & Newcastle plc
Burn Stewart Distillers	InBev UK Ltd	Sharp's Brewery
Cains Beer Company plc	Intercontinental Brands (ICB) Ltd	Shepherd Neame Brewery Ltd
Caledonian Brewing Company Ltd, The	Inver House Distillers Ltd	Shooters UK Ltd
Carlsberg UK	J Chandler & Co (Buckfast) Ltd	Somerfield Stores Ltd
Castle Brands Spirits Group GB Ltd	JC & RH Palmer Ltd	Speyside Distillers Co Ltd
Charles Wells Ltd	JD Wetherspoon plc	St Austell Brewery Co. Ltd
Cobra Beer Ltd	Jim Beam Brands Distribution UK	Timothy Taylor & Co. Ltd
Cocktail Mania Ltd	John E Fells & Sons Ltd	Tesco Stores Ltd
Constellation Wines Europe 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	Vickery Wines Ltd
Coors Brewers Ltd	J Wray & Nephew (UK) Ltd	Wadworth & Co. Ltd
Costcutter Supermarkets Group Ltd	Kingsland Wines and Spirits	Waitrose Ltd
Daniel Batham & Son Ltd	Lanchester Wine Cellars Ltd	Wells & Youngs Ltd
Daniel Thwaites & Co. Ltd	Landmark Cash & Carry Ltd	Welsh Whisky Company Ltd, The
DB Wines Ltd	Laurel Pub Company	WH Brakspear & Sons plc
De Vere Group plc t/a G & J Greenall	London & Scottish International Ltd	Whiskynet
Diageo Great Britain	Maclay Group plc	Whitbread Group plc
Drinks Group, The	Majestic Wine Warehouses Ltd	Whitley Neill Ltd
Edrington Group, The	Marblehead Brand Development Ltd	Whittalls Wines Ltd
Ehrmanns Ltd	Marks and Spencer plc	Whyte & Mackay Ltd
Elgood & Sons Ltd	Marston's Inns and Taverns	William Grant & Sons Distillers Ltd
Enterprise Inns plc	Marston's plc	Wine and Spirit Trade Association, The
Everards Brewery Ltd	Marston's Pub Company	Wm Morrison plc
F&B Partnership Ltd, The	Martin Mccoll	Wye Valley Brewery
Felinfoel Brewery Co. Ltd, The	Matthew Clark Wholesale Ltd	Young & Co's Brewery plc
First Choice Wholesale Foods	Maxxium UK Ltd	
First Drinks Brands Ltd	McMullen & Sons Ltd	



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