Campaign for Pubs

Promote, Support and Protect Pubs

Rt. Hon. Jonathan Reynolds MP
Secretary of State
Department of Business and Trade
Old Admiralty Building. Admiralty Place
London, SW1A 2DY

18th November 2024

Dear Jonathan,

10th Anniversary of the House of Commons vote in favour of a Market Rent Only option: Ten Lost Years

We are writing to you because this month sees the 10th Anniversary of the important vote in the House of Commons in favour of a Market Rent Only (free-of-tie with open market rent) option for tenants or the large pub companies. You yourself voted for this – ***and it has not been delivered***.

Ten years on, the sad reality is that the Pubs Code legislation (and the Pubs Code Adjudicator) has demonstrably failed. Tenants continue to face abusive and unfair treatment; tied product prices remain grossly excessive and exploitative; rents remain excessive; there is no genuine Market Rent Only (MRO) option as envisaged by Parliament; and those tenants who do manage against the odds to actually go free-of-tie are punished, discriminated against and routinely evicted, making a mockery of the then Government's promise that those tenants who do seek to or manage to go free-of-tie will not face detrimental treatment.

The Pubs Code has been a failure – and a deliberate one, on the part of the Conservative Government that reluctantly introduced it.

These are the key ways that it has failed:

- **MRO processes being routinely delayed by pubcos**, meaning instead of tenants being able to go MRO after 90 days, cases take 12-24 months. In some cases, tenants have given up and others haven't bothered trying, knowing they will not be able to achieve MRO before the end for their lease or knowing they can't afford the costs of trying.
- **Tenants considering going MRO are threatened** with punitive measures by their pubco regional representative.
- **Direct discrimination during the Covid-19 lockdowns** with MRO tenants told to pay full rent (despite having no trade) whilst rents were reduced for tied tenants.
- **MRO tenants evicted from their pubs or threatened with eviction,** with pubcos issuing spurious Section 25 notices to oust them.
- **Systematic Pubs Code avoidance** by some of the regulated pubcos by scrapping tenancies and moving towards so-called 'self-employed manager' models or franchises (most of which are not covered by the Code).
- **Continued operation of the exploitative gaming machine tie**, which the relevant House of Commons Select committee said should be abolished in both 2004 and again in 2009.
- **Global brewers have increased their dominance** in the tenanted pub sector, an outcome that is bad for consumers as well as tied publicans and is completely contrary to the intention of the Beer Orders of 1989 which was the last time competition was properly examined in the sector.

- **Small brewers are denied fair access to thousands of pubs** and are still too often forced to supply pubcos at well below market prices just to get listed, whilst the same beer is then on sold by the pubcos' to their own tenants at a huge, well above market price, mark-up.

We are calling on the Government to act to stop this abuse – and now, ten years on, to finally implement what the House of Commons voted for, as well as to go further and put in place wider reforms to finally stop the endemic abuse of the anachronistic beer tie.

The reality of the Tie – an outdated, distorted and abused model

There is a remarkable lack of understanding amongst politicians about what 'the tie' actually means. There is a widespread misconception that it refers to brewers wishing to sell their own beer in their own pubs. This is not what the tie means at all, so distorted and abused it has become.

Brewers of all sizes can (and do) operate managed houses – where they actually run the pub and the manager and staff are fully employed by them. In such cases the brewers, as owners of the business, are of course free to offer whatever beer (and all other products) they wish.

A tied pub is different. The tie in the UK is in fact a model that means that the tenant or lessee of a pub (a separate business, supposedly in partnership with the pub-owning company) is contractually obliged to purchase not only beer, but other products and in some cases services from their property landlord usually at a very substantially inflated price. The mark-up on tied prices, including beer, is often huge, commonly 80-100% above the price of buying direct on the open market.

Due to the highly dishonest lobbying by the most powerful players in the pub sector, politicians fall for the myth that 'the tie' is somehow vital for all UK breweries and beer. In fact, the vast majority of independent UK breweries do not operate a tied leasehold model and are themselves victims of the practice, because the tie, as operated by larger more powerful breweries and pub companies, closes off access to a huge part of the UK pub market, thus restricting competition and consumer choice.

Several of the corporations that operate the tie don't even brew beer or make any product, yet simply exploit the legality of the tie to boost profits and bonuses, at the expense of pubs, publicans and customers. For them the tie has simply become a legal licence to extract more profit that is reasonable from tenanted pubs, leaving many tenants unable to make a living despite a decent turnover. This is not only bad for the individual small businesses and communities affected but for the wider UK economy. Of the six largest regulated companies operating the tied model, one actually has its headquarters in the Cayman Islands tax haven, one is owned by Hong Kong's largest 'real estate' company, one is owned by an American private equity investment fund and two are controlled by foreign global brewers. The tie, once justifiable when tenants of breweries received low rents for higher beer prices, has become one of the key vehicles for corporate abuse in the UK by companies who have bought pubs with no interest in them other than to exploit this archaic and much abused model for corporate and personal gain.

Two things need to happen:

1. **The Pubs Code and Pubs Code Adjudicator legislation must be reformed.** The Code must deliver access to a genuine market rent only option, which must apply to all tenants of the regulated pub companies (not just tied tenants) and to finally put a stop to the systematic unfairness that led to Parliament and the Coalition Government acting in the first place.

2. **There must be wider, simple reform of the tie, to stop the abuse altogether.** This means restricting the tie to brewers, on their own beer and ensuring that any tied product agreement with above market prices is compensated with a commensurately lower rent. This is what this Government must do, if it is committed to helping save our remaining pubs and to ending the ongoing exploitation of small businesses.

The Conservative Government watered down and neutered the legislation after the 2015 General Election. The Conservatives never wanted the legislation and the Pubs Code in the first place, so took the post-election opportunity to row back on promises made during the Coalition and deliver a Code that failed to tackle the unfair model and pretty much allowed business as usual. This was depressingly similar to when a previous Conservative Government had given in to lobbying demands and allowed a loophole in the Beer Orders that led directly to the creation of the standalone non-brewing pub companies in the first place.

The result is that the situation is now as bad as it ever was in the 1990s or before, with six large companies dominating the sector and controlling not only what beer is sold but also the price it is sold at. This is at the very least, clearly anti-competitive, yet the previous Conservative Government has not only done nothing about it, but has actively supported the status quo, putting in place a weak Code overseen with minimal enforcement by a weak Adjudicator, while allowing the regulated pubcos ample time to reposition their appalling business model (which has been achieved at the cost of driving countless small business tenants under and liquidating pubs in communities across the UK) and in almost every case take their headquarters off-shore.

There have been four damning reports by Parliamentary Select Committees, all of which exposed the exploitative practices of the large pub companies that operate tied leases and the fact that their lessees/tenants were not able to make a living despite having a decent level of turnover. The combination of excessive tied prices and high rents has kept thousands of tenant publicans in a position of permanent jeopardy and driven many to business failure, meaning the loss not only of their livelihood, but also their home, and often, hardly surprisingly, their health and wellbeing. As for the pubs, many have ultimately been sold off for alternative use/development, despite the fact that they would have been perfectly viable but for the exploitation of the tie.

It became clear that the Conservative Government deliberately and cynically introduced a weak Pubs Code that wouldn't actually stop the exploitation (and rebalance the risk and reward between pubco and tenant) and delivered an MRO process that was out of the reach of most tenants, precisely so they (and the regulated pubcos) could later argue that the legislation/Code isn't needed and that tenants don't want to go free-of-tie, which is nonsense. We said this at the time – and it is abundantly clear this is the current direction of travel. ***This Government must act to stop this.***

The Labour Party in opposition supported the introduction of the Pubs Code and voted for a genuine Market Rent Only option on 18th November 2024. **Now ten lost years later we urge the Labour Party, in Government for the first time since that historic vote, to take action, undo the cynical cronyism of the last Tory government and finally deliver what Parliament intended ten years ago.**

The flawed Pubs Code Legislation

The Pubs Code legislation is a fudge. It is not what was promised and simply does not work, and to make matters even worse we also have a weak Adjudicator who refuses to take any meaningful action to either address the shortcomings of the Code itself or tackle the clear and systematic ongoing exploitation of tenants.

The original legislation was based on two fundamental principles – that of "*fair and lawful dealing"*, and that "*no tied tenant should be worse off than if they were free of tie"*. Neither of these principles is being delivered. With regards to the latter phrase, it has been grossly (mis)interpreted as meaning that free-of-tie pubco tenants should not be better off than tied pubco tenants (of the same pubco) which is outrageous and absurd. It actually gives the pubcos licence to still take the same unreasonable amount from a newly free of tie pub's profits in the form of an above market rent. What the principle was always supposed to mean was that tied tenants should not be worse off than free-of-tie tenants paying a genuine market rent, based on genuine market conditions (for a freehouse), and certainly not a rent set by the pubco to offset the loss of their take from the tie.

The tie is only justified if the significantly higher tied prices are compensated with a lower than market rent, yet this is not how the pubcos operate the tie. The current lack of a genuine Market Rent Only option allows the pubcos to continue to demand an unreasonably high proportion of pub profits from their tenanted pubs, whether the tenant is tied or free-of-tie (and also to impose other unfair terms).

The reality of this principle needs to be clarified (in legislation and/or through a clear statement by the Adjudicator) so that the distinction between an MRO agreement and a tied agreement is clear and meaningful – which means it must be benchmarked against an independently-assessed open market rent.

The principle that the tied tenant must be no worse of that a free-of-tie tenant MUST be defined *in law* as no worse off than a free-of-tie tenant paying an independently-assessed market rent.

<u>No Genuine Market Rent Only Option</u>

There is no right to a genuine Market Rent Only option in the Pubs Code. The Market Rent Only (MRO) option is not what Parliament voted for and not what Ministers promised. The Pubs Code has completely failed to grant the simple right to go MRO/FOT, as envisaged and as promised by Ministers to Parliament, without pubcos being able to thwart tenants or delay MRO for months/years (*which they do in every single case).*

The *genuine* Market Rent Only option – as proposed by predecessor Committees (then referred to as the 'free-of-tie (FOT) option with open market rent review' or 'genuine free-of-tie option') means the right to opt to move to an independently assessed market rent, on current trading conditions, with no product or service ties. There should be no other changes to the terms of a tenancy or lease.
The original Market Rent Only clause also stipulated a limited period of 90 days from the date of triggering the right, at which point an independently assessed market rent would be payable (with no product and service ties being in place). This stipulation did not survive the drafting process however, and instead the Code allows the pubco to insist on going to arbitration (which isn't necessary and shouldn't be allowed), and instead of taking 90 days can take 2 years, with significant costs to tenants, and with the result that most give up while others are scared off starting in first place.

This is not at all what the so-called 'MRO option' in the legislation and Code was supposed to be. The amendment passed by the House of Commons was replaced and watered down by the Government, and the final version that ended up in the Pubs Code is not a genuine Market Rent Only option at all. This has been acknowledged by the PCA Fiona Dickie in a meeting.

The so-called Market Rent Only option in the legislation actually just means (under certain circumstances) that a tied lessee/tenant can ask to go free-of-tie and is then presented with a figure of what the pub company thinks the free-of-tie rent should be. When a tenant triggers the process,

pubcos make a so-called 'MRO offer' which in reality is the rent figure they want to charge, to offset their loss of the share of profit from not being able to overcharge on product through tied pricing. Following this offer, a free-of-tie rent (not a market rent) is negotiated or arbitrated – and other terms of the lease are changed, often including the length.

This is clearly not the same thing as the genuine Market Rent Only option and not what the Select Committee had called for, nor what publicans, pub-goers and the Fair Deal for Your Local campaign called for.

Even where tenants get to the stage where they can refer to an Independent Assessor, pubcos then insist on arbitration (something that was never envisaged as a necessary part of the free-of-tie option with open market rent aka a genuine MRO option). Rather than having the right to pay the independently assessed market rent from 90 days after triggering the option, pubcos delay the process often for as much as eighteen months or two years, meaning many tenants simply give up.

Despite the Code stating that pubcos are prohibited from treating tenants who opt for MRO unfairly (with 'detrimental terms') that happens in ALL cases. MRO tenants are put onto advance quarterly rent payments (with a commensurate increase in the up-front deposit payable to and held by their pubco) and are forced to sign a completely new - and nearly always shorter - lease (*when MRO could and should be delivered via a quick and simple deed of variation, simply changing the rent to a market rent and ending all product and service ties*). This has been ignored by both Adjudicators.

All tenants seeking to take (or actually taking) the MRO option routinely face detrimental terms and treatment once they have committed to that route (with many finding themselves victims of 'Section 25' no-fault commercial evictions at the earliest opportunity), They also faced disgraceful discrimination during the pandemic in terms of full rent demands compared with generous discounts for tied industry colleagues. The regulated pubcos continued to charge MRO tenants very high, and indeed in a great many cases, FULL rent during lockdown. This was absolutely disgraceful – and clearly discriminatory given the very significant discounts extended to tied tenants – yet, despite there being absolutely no contractual basis or defensible justification for this, the Pubs Code Adjudicator did nothing. We wrote to the BEIS Secretary of State about this at the time. In addition, the PCA did nothing when tenants could/should in our view have been able to access MRO, we wrote to the PCA regarding this.

The Pubs Code legislation needs to be urgently revisited so that the meddling of the Government at the time can be unpicked and remedied. The records still exist as to what was originally proposed and promised, and those records clearly show what should have been delivered by the seismic result of the Vote in November 2014.

We need the genuine MRO option that was promised, and we need the process to be as swift and straightforward as originally planned. This means the right for pub tenants to go free-of-tie, on an independently assessed rent (not set by the pub-owning company - and with no link to the amount currently being taken by the pub-owning company) within 90 days of triggering the process (and with the new rent payable from that day) and with NO other changes to the lease terms or length. This would finally stop the chronic and ongoing overcharging of pub tenants by the large pub companies.

We also want to see the Pubs Code legislation reformed so that it applies – as was originally envisaged - to companies that have 500 more pubs (on any arrangement). The legislation needs to apply to tied and free-of-tie pubs, as well as 'franchises' and 'self-employed management' models (which are in truth simply thinly-veiled Code-avoidance models). The right to be treated fairly and not to face discrimination is vital for tenants that opt to go MRO/FOT and this must be properly enshrined

in the Code. All tenants of all companies owning 500 more pubs should have the right to independent rent assessments, to stop unreasonable rents being charged.

We also want to see the Pubs Code legislation changed to allow all tied tenants of the large companies to ask for a full breakdown of tied profit being made by their pub-owning company (incl*uding the prices being paid by the company for product they purchase*) and for all rent assessments to include a parallel tied and free-of-tie assessment (with the latter being based on an independently-assessed market rent).

Abuse of Section 25 Notices and phoney franchises and 'self-employed' pub models

The abuse of hostile Section 25 (no-fault eviction) notices is rife. They are now routinely used to evict long term MRO tenants on the basis that the pubco want pub back 'for their own occupation' as a managed pub. This claim however simply masks the true objective which is to evict FOT tenants and reinstate a new tenant on terms which will deliver a return to the pubco in line with former tied profit margins. Many tenants have been thwarted in applying for MRO, due to the serving of a Section 25, and many other tenants are now facing Section 25 notices because they have successfully secured a Free of Tie deal and the pubco wants to evict them in order to reimpose their own restrictive and profiteering terms. We wrote to the Select Committee about this in March 2022.

To achieve this end all the regulated companies have now put in place a new phoney franchise/self-employed management style of tenancy which they are attempting to pass off as a managed model in order to justify no-fault evictions on the fake basis that they are taking the property back for their "own occupation". Such deals were not a feature of the industry until the Pubs Code became a reality, and as such it is totally obvious that they have only been developed in reaction to the Code as a blatant means of Code-avoidance.

Under such a deal the operator is self-employed and employs their own team and pays their own taxes out of a turnover share. They are not in any real sense an employee manager of the property owner (who, remember, has claimed to now be running their own business from the reclaimed property), but instead a self-employed operator in an Uber-style arrangement. These are almost certainly in breach of IR35 legislation and should be investigated. At least one judge has in fact indicated that such models are open to civil legal challenge as a possible 'sham' contract, but the pubcos have continued regardless, apparently confident that the costs and risks involved will continue to put such a legal challenge far out of reach for most tenants.

The government is rightly committed to ending the scourge of no-fault evictions in the domestic rental sector, they must follow suit to protect publicans from being unfairly forced out of their homes and communities (whilst also being also deprived of their livelihoods).

The increasing dominance of big brewers and the impact on small brewers

The increasing dominance of pubcos especially Star (Heineken) raises grave concerns in terms of healthy competition. The fact that the legislation and Code is so weak and watered down allows all pubcos to continue taking more than is fair or reasonable from pubs' profits, but it has also allowed the big brewers to increase their dominant market share in the on-trade to the great detriment of local independent breweries who are being denied ever-more access to potential local pub outlets. These local brewers therefore desperately need more pubs to be free houses/Free of Tie pubs and far fewer of them to be tied outlets.

A competition review into the beer and pub sector is now seriously overdue, there hasn't been one since the Beer Orders 33 years ago despite the chronic problems that have so clearly beset the sector since that time

Small brewers also suffer in other ways under the pubco tied model. The large pub companies will only put small brewers on their tied price lists if they sell to them at very low prices, and increasingly they are insisting that small brewers are made to jump through arbitrary and costly 'compliance' hoops just to be accepted onto supply lists. Their beers, of course, are then marked up hugely to tied tenants.

There is a stark difference between what pubcos pay small breweries, which is always of course less that those brewery's actual (free trade) prices, and what they the pubco then charges their own tenants for that same beer (typically double what they have paid). This profiteering at the expense of both the small brewer and the publican tenant is all the more obscene when one understands the fact that the beer is delivered direct by the small brewer to the publican. The pubco does not even have any logistics to perform.

We are encouraged that this government has made clear their desire to increase market access for small brewers, and we hope this translates into real action in our sector following ten lost years of anti-competitive corporate dominance under a failed Pubs Code.

The failure of the Pubs Code Adjudicator

As is the case with the Pubs Code itself, the role of the Pubs Code Adjudicator was created as a direct result of tenant campaigning, to address the clear and proven imbalance between the pubcos and their tenants, and to address and remedy clear historic and enduring injustices.

However, far from being a champion for abused and downtrodden tenants, both Adjudicators to date have shown a marked lack of interest in the underlying principles of the Code or in dealing with the way tenants have been consistently thwarted from taking the MRO option.

Both Adjudicators have focused only on peripheral issues, not the fundamental ones, including above all the fact that tenants are being denied what was supposed to be their clear legal right - to go MRO and to be able to do so within 3-4 months. They have instead spent much time attending trade shows and other industry events, despite these not being somewhere tenants will even be, as they will be running their pubs!

There was also outrage from tenants about the extraordinary ruling by Fiona Dickie on gaming machines, which means that pubco tenants can only have gaming machines if they are tied. This is clearly not what was envisaged in the Pubs Code or by the Select Committee that had recommended a ban on the gaming machine tie. We wrote to the PCA about this in April 2022.

Consultations about the Code/PCA have been deeply flawed, restricted and frankly phoney, as explained in our response. The whole system has been set up to be weak, to continue the status quo and allow the ongoing and well documented abuse in the sector to continue

We need a genuine Adjudicator that will stop pubco abuse and has both the clear powers and remit to stamp out abuse by the regulated pub-owning companies, whether the tenants are tied, free-of-tie or operating a so-called 'franchise' or 'self-employed management' model. We need the entire role and purpose of the office of the Adjudicator to be reviewed. We need to ensure that we have an Adjudicator in position who has the powers and the will necessary to *actually adjudicate* (rather than simply arbitrate on a case-by-case basis as currently happens) in the face of clear continuing systematic misbehaviour by the pub companies.

We also need to see a situation where the Adjudicator is backed up and empowered by Ministers. This would be in stark contrast to the situation we have seen so far, whereby Ministers

and senior civil servants appear to have actively kept a continued clear distance from all the issues involved, and have used the existence of the PCA's office as a both smokescreen and a placatory front to justify continued inaction when it comes to truly helping pubs and their tenants.

We need a new empowered and impassioned Adjudicator who will actually argue for, secure implementation of and then fiercely uphold the original key principles of the Pubs Code legislation, who will stop the discriminatory treatment of tenants wishing to exercise their hard-won legal right to go Free-of-Tie, and who will actively support those tenants by ensuring they can achieve a genuine and fair Market Rent Only deal.

Wider reform of the Unfair Tied Pub System

The fact that such widespread abuse of the tie is still ongoing shows that stronger, more meaningful legislation is the only way to stop the excessive profit extraction to which the pub companies are seemingly addicted. Such profiteering prevents hard-working tenants from being able to earn a living and leads ultimately to the failure of the pub tenancy itself, not only driving the tenant out of their pub (and home) but also, quite needlessly, often leading to the eventual loss of the pub itself once it is put up for sale ('disposal') by the pubco as a 'development opportunity'.

So iniquitous has the beer tie become that pubcos must devote significant resources to the enforcement of tied terms, including investing heavily in flow-monitoring equipment in each pub cellar in order to record the amount of liquid dispensed on each tap and pump. This data is compared to the amount of liquid supplied through the tied supply arrangement and if there is a discrepancy the publican will face accusations of 'buying out' (i.e. buying direct from another supplier, for example from a local brewery at that brewery's genuine market price) and that publican will face harsh sanctions in the form of a huge (often four figure) fine. This intimidating situation illustrates how the beer tie (when abused for excessive profit) is not only a restraint of trade, but actually amounts to a legalised protection racket.

The tie - meaning restricted choice and marked-up prices on those beers that are contractually made available – is an anomaly in the business world. As such it is a privilege that should come with responsibility and should not be open to abuse. **The tie can only ever be realistically justified on beer that is brewed by a brewery that is also the freehold owner of the pub, and only if fixed rent is proportionately reduced to compensate for the higher prices.**

Non-brewing pubcos should simply be banned from operating the tie, as there is absolutely no justification for their use of it. It is an unjustifiable and anomalous loophole that they have consistently only ever abused in order to actively profiteer from both their suppliers and their tenants. Ultimately the resultant high prices adversely impact the customers of pubs in local communities across the UK, as does the lack of choice imposed by these restrictive tied arrangements.

It is also important to note that it is not only the large regulated pubcos are abusing and profiteering from the tie in this way, but also sadly smaller pub-owning companies that have chosen to operate a similar tied model, but who own fewer than 500 pubs and are therefore immune from the effects of Code as it stands. The tie must be reformed so that there is no abuse in any part of the sector.

The Gaming Machine Tie

The fact that pub owing companies have been allowed to operate a tie on fruit machines (and other gaming machines) - whereby they extract a considerable share of profit in return for no contribution whatsoever - is grotesque and should have been outlawed years ago, as recommended by Parliamentary Select Committees. It was one of the key issues in the development of the Pubs Code,

but as with so many other measures the Government at the time watered the relevant section down allowing the pubcos to continue to operate this disgraceful system.

Yet another failure by the Pubs Code Adjudicator has been the interpretation on this issue, which in effect gave the regulated pubcos carte blanche to continue to enforce the gaming machine tie, which is a disgrace. **There is a very simple action required. The gaming machine tie should simply be banned entirely.**

Dealing with rip-off rents

As well as the issues with the tie, the reality is that many owners in general (often faceless corporations, remote investment funds or uncaring property companies) simply use pub buildings as a cash cow by charging more rent than is reasonable or sustainable. They then also refuse to change these rents when trading conditions are adversely affected (as has happened with the impact of both the pandemic and the cost-of-living crisis). Some owners also insist on upward-only rent contracts, which force increases in rent, often substantial ones, regardless of the market conditions.

Action is needed on this, including a statutory right to a rent review for all pub businesses, including pub tenants/lessees, as well as a ban on "upward-only" rent review clauses in all pub leases so that it is possible to reduce rents in future rent reviews if trading conditions continue to make current rents unsustainable.

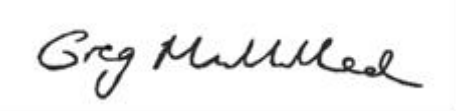
This situation was highlighted most starkly of all during the Covid lockdowns, when many unscrupulous pub building owners insisted on the pub business paying rent, despite their complete inability to trade (and the pub being rented with the purpose of trading as a pub). Insurance companies openly shirked their responsibilities, leading to mass challenges, and the rent arbitration process that was eventually put in place by the Government was frankly a cop out and a mess, and unsurprisingly proved a complete failure for a great many tenants, who will still be paying the price of terrible arbitration rulings, if indeed they are still trading at all.

Please stand up for pubs and publicans not pubcos – and give tenants a secure future

All those that supported the introduction of the Pubs Code and voted for the Market Rent Only option in 2014 need to understand that the reforms have failed because they were redrafted and watered down by a Government that didn't want to implement them in the first place, due to their close ties with the pub-owning companies.

Promises made to the House of Commons and to pub campaigners were broken, leading to ten lost years, and we call on this Government to now act to implement new reforms that actually work to stop the ongoing abuse of tenant publicans, and the associated damage to many pubs, to livelihoods and lives and to communities.

Yours sincerely,



Greg Mulholland
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Chair

Cc Rt. Hon. Liam Byrne MP, Chair of the Business and Trade Select Committee