

# The new alcohol duty system

Consultation response from CAMRA, the  
Campaign for Real Ale



January 2022

## Executive Summary

Thank you for the opportunity to respond to this consultation. Our submission focusses on beer and cider duties, and the associated small producer reliefs for those categories.

- CAMRA broadly supports the proposed reforms to the alcohol duty system, and especially those that incentivise the consumption of beer, cider and perry in pubs and social clubs.
- We strongly support a new draught duty rate, commend the Government for this new approach to alcohol taxation, and urge them to:
  - a. increase the proposed differential between draught duty and general duty
  - b. introduce the new draught duty rate as soon as possible
- We believe that smaller producers of beer, cider, and perry are central to maintaining choice and diversity for consumers, as well as job creation and skills development in their sectors, but are increasingly disadvantaged due to the overt dominance of global brands in the UK on-trade.
- It is therefore vital that smaller brewers and cider producers can enjoy the benefits of the draught rate, so it must apply to containers that are 20-litre and above in size, rather than 40-litre as originally proposed.
- It is also imperative that the new small producer reliefs are regularly reviewed to ensure their value is maintained relative to the general duty rate, and to account for changes in the wider market that put small producers at a competitive disadvantage.
- Where appropriate, the duty system should also support minimum quality assurances for consumers: for example, by ensuring that all cider and perry produced in the UK has a minimum juice content of 50%.
- Finally, we believe that it is important that producers and consumers across the UK can benefit from the reforms to the duty system. We therefore urge the Government to reach an agreement for the new draught duty rate to apply in Northern Ireland.

## New draught duty rate

### Principle of a lower rate of duty for draught beers and ciders

CAMRA strongly supports lower duty rates for draught beers and ciders.

This is a bold reform to the duty system to allow for preferential rates of duty to be targeted at the on-trade only, and more specifically at pubs. We believe that a preferential rate of duty for beer sold in the on-trade is the most effective way to promote responsible drinking and support economic growth and job creation in the hospitality sector and its supply chain.

This will also promote a more sustainable way to consume beer and cider. Draught beers and ciders are served from reusable casks or kegs into a reusable glass, without the single use packaging and consequential waste management and recycling costs that are associated with the off-trade.

# The new alcohol duty system consultation response

## New draught duty rates

The table below shows the proposed draught duty rates relative to the proposed general duty rates.

Category and ABV	General duty rate	Draught duty rate	Differential (%)
Beer: 1.3-3.4%	£8.42	£8.00	-5%
Cider: 1.3-3.4%	£8.42	£8.00	-5%
Beer: 3.5-8.4%	£19.08	£18.13	-5%
Cider: 3.5-8.4%	£8.78	£8.34	-5%

Table 1 – new proposed draught and general duty rates

Our previous economic modelling, submitted to the Treasury, showed that the introduction of a new Draught Beer Duty rate could<sup>1</sup>:

- Result in £26.6m of additional expenditure on draught beer
- Pull consumption back to into pubs from the off-trade
- Create additional jobs in pubs.

Our modelling showed that the greatest benefits in job creation and pull in consumption from off channels to the on-trade were seen where the differential between general and draught duty was at least 10%.

We would like the Government to reduce the proposed draught duty rate further to increase the differential between draught and general duty, to see the maximum benefits of the new policy in terms of job creation, high street regeneration and support for pubs and social clubs.

## Qualification criteria

We strongly believe that new draught duty rate should apply to containers of 20-litre and above, that are designed to be connected to a pump or dispense system.

A pin, the smallest container typically connected to a dispense system in the UK on-trade, has a volume of 4.5-gallons, or around 20 litres.

It is also important that the qualifying criteria are based on the design of the container, rather than the final dispense method. This will allow for traditional gravity dispense to continue (where beer or cider is dispensed using a tap directly from the container, rather than connecting to a pump or other dispense system).

CAMRA carried out a survey of pubs and social clubs between 19 and 30 November 2021. Some questions focussed on the size of draught beer and cider containers that they typically stock, and their reasons for doing so.

This survey was promoted to pubs and social clubs across Great Britain and 395 respondents answered the section on draught containers.

---

<sup>1</sup> The Impact of Cutting Draught Beer Duty – Europe Economics for CAMRA (2020)

# The new alcohol duty system consultation response

Most respondents stated that their 'average' stocked draught container size was 9 gallon (approx. 40-litre) or 50-litre (see Figure 1 below).

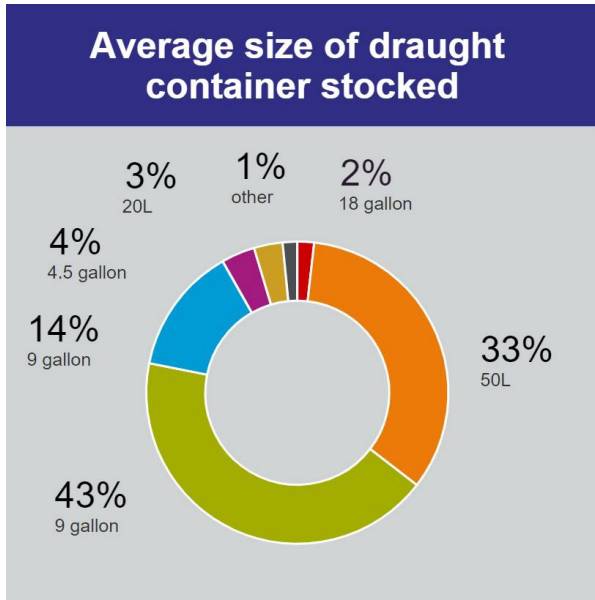


Figure 1: Average size of draught containers stocked by respondent (CAMRA, Nov 2021)

However, further investigation shows that taking the average draught container size is an oversimplification.

When asked to list the different sizes of draught container currently stocked, nearly as many respondents ticked options for 30-litre, 4.5-gallon, and 20-litre containers, as for 50-litre and 9-gallon (Figure 2 below).

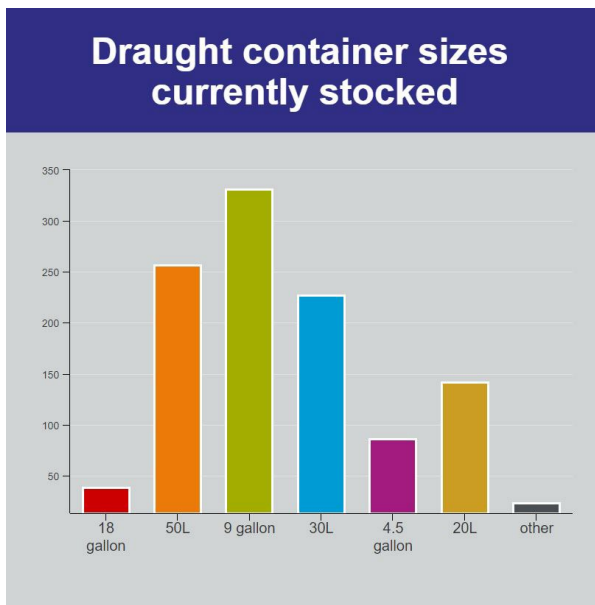


Figure 2: All draught containers currently stocked by respondent (CAMRA, Nov 2021)

From respondents' answers to the question why they stocked draught containers under 40-litre, we identified three key reasons why changes to the qualification criteria are needed:

# The new alcohol duty system consultation response

1. For consumers to have access to quality products – 34% of respondents stock smaller container sizes to maintain the quality of the draught products relative to demand (which is especially important for maintaining the reputation of cask beer)
2. For all brewers and cider producers to benefit equally – 46% of respondents stated that they could only purchase their preferred products in under 40-litre formats. Many stated that this was specifically relevant to small brewers and cider makers.
3. For licensed premises of all sizes and operations to benefit equally – 9% of respondents said their venue was unsuitable for use of 40-litre containers, whether due to cellar space or opening patterns.

We have appended a list of free text comments that we received in our survey. This data was aggregated to produce the chart below.

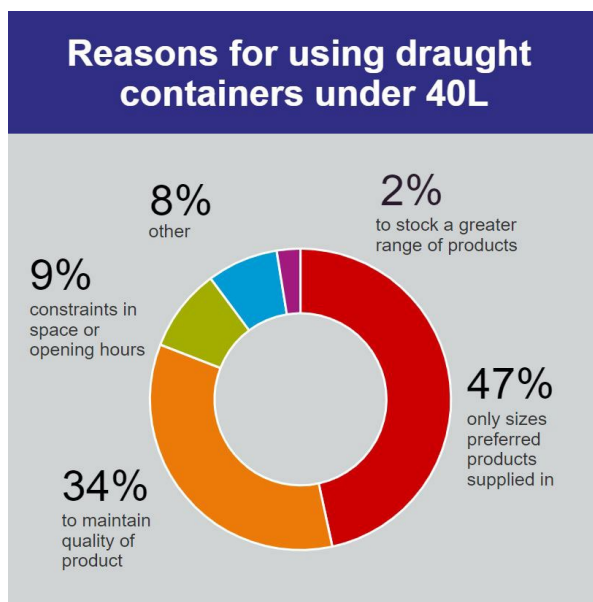


Figure 3: Reasons for using draught containers under 40-litre (CAMRA, Nov 2021)

We believe the evidence we have collected strongly supports calls for the draught duty rate to apply to containers of 20-litre and over. Excluding containers in the 20-litre to 40-litre range would primarily exclude the products of small brewers and cider producers from the benefits of the lower duty rate. This would present an unacceptable barrier to the on-trade market, which already is, in effect, foreclosed to many independent producers by the restrictive supply ties and exclusive purchasing agreements that are in place across the UK pub sector. It would also unfairly penalise pubs, social clubs and brewery taprooms with small cellar or storage arrangements or low turnover.

## Implementation

The pandemic has had a devastating impact on pubs, social clubs and the wider hospitality sector, and specifically on wet-led venues that were unfairly penalised through measures such as curfew and the 'substantial meal requirement' and then suffered a severe setback because of the Omicron variant and its effect on trading levels over the festive season last year.

# The new alcohol duty system consultation response

It is important that the Government recognises this and delivers wide ranging-reforms that help the pub trade thrive. Bringing forward the introduction of the draught duty rate would be one such measure to help the sector recover from the pandemic and thrive in future.

## A policy for the whole of the UK

We note the statement in the consultation document that:

*“The Government will continue to discuss the application of these reforms to Northern Ireland with the EU during the consultation period of the review.”*

As a UK-wide consumer group, we believe it is imperative that consumers and producers in Northern Ireland can reap the benefits of all the reforms to the duty system. We hope that the Government can reach agreement that the new draught duty rate will apply in Northern Ireland as soon as possible.

## Duty fraud

We do not believe that risk of duty fraud or diversion is significant enough to merit onerous safeguards.

A 2012 All-Party Parliamentary Beer Group inquiry into beer duty fraud suggested that most fraud relating to beer duty concerned beer sold through the off-trade in cans and, to a lesser extent, bottles. Fraud concerning beer in kegs and casks was found to be very limited in scope.

The most common type of fraud was abuse of the duty suspension system that allows wholesale alcohol to be moved around Europe before duty on it is paid. This has been partially tackled by the introduction of the AWRS.

Since then, the Treasury and HMRC have made significant strides forward in closing the tax gap for alcohol duties. However, CAMRA believes that additional funding should be allocated to HMRC to allow general beer diversion fraud to be tackled more effectively and increase duty receipts to the Treasury.

## **Beer duty**

### New general duty rate

It is widely recognised that lower strength products like beer are significantly more expensive to produce per unit of alcohol than high strength products like spirits. They also have greater distribution costs, owing to their higher water content.

However, there are still inconsistencies in proposed levels of taxation on beer relative to cider, despite both generally being produced at under 10% ABV, and especially the general and draught rates at 3.5-8.4% ABV (see Table 1).

Therefore, we believe it is more appropriate to set the general beer duty rate closer to the £8.78 per litre of pure alcohol at 3.5% to 8.4% for cider, than the currently proposed £19.08, with an equivalent adjustment to the draught duty rate.

## Lower strength duty band

It is widely recognised that the risks for overconsumption are greater with stronger drinks. Additionally, the strength of beer in the UK has been steadily declining. In 2000 the average beer had an ABV of 4.6%, compared to an average 3.9% in 2018.<sup>2</sup>

This makes beer easier for consumers to drink in moderation, and therefore less likely to be abused, and furthers the argument that beer should be treated differently from spirits or wine in the duty system, and that the duty system should encourage production of lower strength beers.

CAMRA strongly supports the Government's proposal to raise the upper threshold of the lower duty rates from 2.8% to 3.4% as this will encourage the production of a wider range of lower alcohol beers.

## **Cider and perry duty**

Where cider is mentioned in following paragraphs can also include perry.

### Minimum juice content

We believe that, where appropriate, the duty system should also promote minimum quality assurances for consumers.

Changing the definitions of alcohol categories for tax purposes can also help the Government achieve policy objectives in a more sophisticated and coherent way than the addition of extra tax bands (as has been seen in the past, leading to the complex and incoherent system that these new proposals seek to rectify).

Cider duty structures have changed several times over the last decade or so, owing mainly to the emergence of so called 'white' ciders that are characterised by a low juice content, high ABV and low cost per unit to the consumer. White ciders are recognised as the cause of significant alcohol harm and successive Governments have sought to reduce their consumption through changes to cider duty, and minimum juice content was introduced to force the reformulation of the cheapest products.

On the introduction of the newest duty band for cider (between 6.9% and 7.5% ABV) the then Chancellor of the Exchequer, the Rt Hon Phillip Hammond MP said:

*"This means that some drinks, like.....high-strength white cider will see a small increase in their rates because they are currently undertaxed, given their strength. That is the right thing to do, and it will help to end the era of cheap, high-strength drinks which can harm public health and enable problem drinking."*

However, the main consequences of the new duty band were:

- a reduction in pack size of some white ciders,
- a general reduction in ABV from 7.5% to 6.8%,
- a subsequent price reduction for the consumer,

---

<sup>2</sup> BBPA Statistical Handbook 2019/ HMRC

# The new alcohol duty system consultation response

- and a higher rate of duty for small cider makers for whom many products naturally sit between 6.9 % ABV and 7.5%, but who were not the intended target of this new duty band.

We believe that minimum juice content is the correct mechanism for the Government to use to tackle the continuing issue of white ciders without either impacting unfairly on small producers who make high quality, high price point, products or complicating the duty system with additional tax bands.

CAMRA would therefore like the Government to make an amendment to the definition of cider for tax purposes to raise the minimum juice content of cider from the current 35% to at least 50%. This would:

- Provide consumers with confidence that any cider or perry they purchase contains at least 50% apple or pear juice.
- Complement the new small producer relief by providing increased competition in the marketplace for smaller producers making cider with a higher juice content and at higher production cost than global producers.
- Require reformulation to increase the quality and price of most cheaply formulated ciders – a key aspect of improving the value perception, and the quality, of cider and perry.
- Provide environmental benefit through a renewed demand for the several thousand acres of orchards bearing tannin-rich apples that are being currently wound down owing to a lack of demand.

## Small Producer Reliefs

### Expanded small producer reliefs

80% of Britain's 500+ cider makers are currently small producers<sup>3</sup>, and their businesses represent an integral part of rural culture and maintaining biodiversity through their orchards. These producers typically make less than £10,000 per year in sales and provide consumers with a choice of artisan products in a market that is dominated by very large cider producers that operate on a global scale.

We are extremely supportive of the expanded small producer relief to allow these small producers to expand and thrive.

### Production thresholds

We have welcomed the Government's response to the Small Brewers' Relief technical consultation, which confirmed that:

- The lower taper threshold for the relief would start at 2,500 rather than 2,100 hectolitres
- The upper threshold of the taper would increase from 60,000 to 100,000 hectolitres

We believe that the 100,000-hectolitres threshold is a more appropriate production volume to capture UK-based and independently owned small brewers. We still believe that this should be extended to brewers that produce up to 200,000

---

<sup>3</sup> National Association of Cider Makers

# The new alcohol duty system consultation response

hectolitres, as was allowed for under EU Directives that governed previous duty structures. Those brewers still suffer competitive disadvantage based on size relative to their global counterparts.

The 70-hectolitres duty exemption for the smallest of cider makers is vital for preserving the traditional 'farm gate' cider industry, and we welcome the Government's confirmation that this will be retained. We believe this is the appropriate production threshold above which the small producer scheme for cider and perry makers should begin.

## Calculating production in litres of pure alcohol

CAMRA does not hold specific data on the average strength of beer or cider produced relative to overall production volumes.

We would urge the Government to work closely with the Society of Independent Brewers and regional cidemakers' associations to ensure that appropriate average ABVs are used to convert hectolitres of finished product into hectolitres of pure alcohol for the purpose of the new small producer reliefs.

## Uprating of small producer reliefs

We recognise that the Government intends to convert Small Brewers' Relief from a percentage to a cash value and deliver the new small producers' reliefs in the same way.

CAMRA opposed the conversion to a cash basis due to our concerns that the relief rate could become disconnected from the general duty rate over time and therefore lessen in value relative to the costs of production and to inflation.

It is imperative that the new small producer reliefs are regularly reviewed to ensure their value is maintained relative to the general duty rate, and to account for changes in the wider market that put small producers at a competitive disadvantage, especially in relation to global drinks manufacturers.

## **About CAMRA**

CAMRA is a UK-wide consumer and campaigning group representing around 160,000 beer and cider drinkers. We campaign for choice in quality beer and cider and thriving pubs and social clubs in every community.

## **Contact**

Ellie Hudspith – CAMRA Senior Campaigns Manager

[ellie.hudspith@camra.org.uk](mailto:ellie.hudspith@camra.org.uk) / 07538177662

# The new alcohol duty system consultation response

## Appendix – free text responses on reasons for purchasing draught products in containers under 40-litres

The table below contains free text answers given to the question “If you typically order draught beer and/or cider in containers of less than 40 litres (i.e. a 30 litre keg, 4.5 gallon pin, or 20 litre ‘bag in box’), can you tell us why you do so?”

We have corrected typos and some spelling and grammatical errors and expanded commonly used abbreviations for consistency.

001	Mostly it's how it comes. One or two of the craft beers is due to lower sales – allows us to keep a greater range
002	Allows us to give more choice
003	To have very regular changing products, i.e. something different every time a customer visits.
004	allows us to regularly change what is on offer to bring the customers more variety
005	Give a larger range without endangering quality. so can change more often
006	Key keg is selling almost as much as cask in my pub. Sales of cask ale have declined significantly this year. So that means more 30 & 20 litre containers. Cider sales have also steadily declined over the years so I'd never buy this in anything other than a 20-litre bag in box
007	We use a distributor for Heineken products, they can only get cider in 30-litre kegs size available
008	Cider in 20 litres as that's what the cider makers supply.
009	as we generally stock from smaller independent breweries, they tend to offer smaller kegs
010	the size the brewery supply
011	Guinness 30-litre, quality control. Shipyard American IPA, only size available.
012	The size the beer comes in
013	Ciders are 20-litre bag in box. Some ales are 4.5-gallon. Some Stout Kegs are 30-litre
014	Real cider comes mainly in 20-litre bag in box. 4.5-gallon pins allow more variety of beer.
015	We have over 12 real/still ciders. They are packaged in 10-litre & 20-litre boxes
016	30-litre keg is the most common vessel size for craft keg.
017	This is what the local breweries supply.
018	Most craft beer offered in 30-litre kegs
019	The market prefers keg beer. Most breweries sell it in 30s. I buy it in 50s where available, because it's better margins.
020	Poretti only 30-litre. Cask 4.5-gallon useful when a 9 wouldn't sell, stouts usually.
021	Most kegs from independent breweries are 30-litre or less
022	Most microbreweries supply keg beers in 30-litre and 20-litre kegs. Most cider comes in 20-litre bag in box. Larger volumes ( <i>reduce</i> ) variety as they would last longer.
023	Only available in this size
024	Cider bag in box 10-litre
025	Certain products breweries only supply in these sizes
026	Brewery supply only 30-litre, and shelf life
027	That's what our local breweries supply in

## The new alcohol duty system consultation response

028 All independent cider producers we have used sell in 20 or 10 litre bag in boxes and the same with independent breweries who sell in 30-litre kegs. We only buy from small independent suppliers.

029 Craft keg are 30-litre / Cider 20-litre bag in box

030 Mainly 20-litre for our ciders as this is the container size. 50-litre or 30-litre for our beers and firkins for our cask ale (*note: a firkin = 9 gallons or ±40 litres*)

031 hand pump cider in 20-litre boxes – small independent. Rest handpumps in 9 gallon

032 Kegged beer from small independent breweries predominantly comes in 30-litre kegs and sometimes 20-litre kegs depending on strength and style

033 30-litre as they are the only sizes offered in those particular products by the PubCo.

034 Guest kegs are usually 30/20-litre if stronger. Customers like the guests to change regularly and the tub size reflects this. You don't want a guest beer on too long. Bag in box is always 20-litre. Industry standard.

035 certain products or breweries supply this way

036 This is reflection of the independent breweries we use in the north west and afar

037 The only size available from certain suppliers

038 30-litre is the typical keg size from independent breweries.

039 Craft beer and cider only supplied in those sizes

040 As it is supplied that way. 50-litre guest keg may sell too slowly – prefer 30-litre

041 Old Rosie only comes in 20-litre bag in box

042 This is the most common keg size for craft beer

043 That's the standard size.

044 To guarantee quality independently produced products I have to buy the smaller containers that these breweries and cider makers supply them in.

045 Most of our keg and keykeg products come in 30-, 20- and 12-litre containers partly due to abv and partly as they are quick changing guest products. They are not available in larger sizes. Same for 20-litre cider bag in boxes

046 All cask beer supplied in 9 gallon containers

047 a lot of guest craft beer comes in 30-litre kegs and cider on hand pump comes in a 20-litre bag in box

048 Most local breweries sell keg beer especially in smaller containers than 40-litre

049 Draught still ciders are 20-litre bag in box. Devon Rock and Mena Dhu only supplied in 30-litre

050 It's how the industry works.

051 Most of our 30-litre stock is our own beer (in firkins). Commercial brands (Stowford, Birra Moretti...) come in larger containers. Guinness is purchased in 30-litre containers because we sell only a very small amount.

052 Supply options

053 What breweries pack it in.

054 Being a craft beer bar the majority of kegged beers available standardise on 30-litre kegs.

055 breweries supply in that size

056 That's how it comes

057 That is the only way for one of my beers

058 30-litre KeyKeg is common amongst craft breweries and the size works well for rotational stock

059 trad beer mainly comes in 9-gallons

060 Company who supplies cider only sell 20-litre bag in boxes or bottles

# The new alcohol duty system consultation response

061	only produced in 30-litre
062	breweries supply in these formats
063	certain products are only available this way
064	Most of the small independent breweries we use sell in 30-litre and 20-litre. This helps us with keeping the beer fresh for service and a quick turnaround to keep customer interest high.
065	3 products are only available in 30-litres maximum size
066	the way the brewer supplies this
067	Always at least 3 x 20-litre bag in box ciders available as that's all that is supplied by Stonegate to me
068	Per Week: 40- & 30-litre kegs of varying styles, because that's what independent breweries mainly use. Perhaps 4 x 20-litre kegs of strong or extreme beers. 6 x 20-litre bag in box cider. We are a 'destination venue' and customers visit from afar for our wide selection.
069	It is only supplied in the containers that I order, no choice
070	We source all of our beer from independent producers who typically package in 20-/30-litre kegs due to lower production of higher quality beers
071	Guinness always in a 30-litre, just buy it for a couple of regulars.
072	Most craft beer kegs come in 30-litre and we stock 3 lines
073	only supplied in that
074	All cider is in 20-litre bag in box
075	That's often just how they come. We may get 1 or 2 barrels and then change stock
076	30-litre keg is only available for neck oil and bones lager
077	It's how they are supplied to me
078	Some products only come in this size. But if we are putting on a beer such as mild that might not sell 9 gallons before it goes off we would try and purchase it in a pin. ( <i>note: a pin = 4.5 gallons or ±20 litres</i> )
079	Almost all craft beer comes in 30- or 20-litre
080	Box 20-litre cider and 20-litre special craft beer
081	We regularly order craft draught beers only available in 20- and 30-litre containers from the producers so there is no option to order larger container quantities and we also have limited storage space in our cellar so this does work for us.
082	Certain brewers and cider producers only do in smaller sizes
083	certain brewers only supply them in smaller containers
084	30-litre because that's what independent craft beer is supplied in mainly.
085	Most products come in that size container from those breweries, if they came in bigger containers like 11 gallons I would have them.
086	Only size available for that product
087	Chieftain IPA only available in 30-litre
088	Either because 30-litre size appropriate to volume throughput or product only available in 30-litre container.
089	Just what breweries offer
090	Most not available in larger size
091	Breweries commonly offer 30-litre or below. We choose this size to allow good rotation of products from multiple breweries.
092	30-litre for Guinness keep always fresh and IPA
093	Imported/made in that size
094	30-litre Guinness is quiet times due to best before date, 30-litre ice breaker as Brewery sends it like this, 10-gallon Stella is sold that way too

## The new alcohol duty system consultation response

095	We use small producers who use smaller kegs. We do sometimes get 50-litre of a lager type beer, but this just depends on the producer
096	The independent breweries that we buy kegs from (e.g. Cloudwater, Track, Verdant, Deya) typically use 30- or 20-litre kegs presumably because this is the maximum size that can be shipped by courier (as opposed to their own drays). Shelf life is not a factor with kegs. For cask beer, our stillage is designed to hold pins or firkins but nothing larger.
097	Not availability in larger sizes Shelf life
098	Most of the small independent breweries I stock don't use any bigger vessel than 30-litre
099	Just what breweries supply
100	It comes in that size from supplier or brewery
101	All our draught keg (except 2 House lines) come in 30- or 20-litre kegs, 50-litre is not an option, nor would we purchase in such sizes for guest lines. Occasionally buy 4.5-gallon pins for speciality style casks (sours, Belgian etc)
102	We source a lot of Belgian and German beer which tends to be provided only in 20-litre containers. Most cider, Belgian beer we serve on draught that we rotate, is often high in ABV, so also often comes in 20-litre
103	its the only size the product comes in
104	All our Real Cider is served from 20-litre bag in box. I do not know of any cider producer that sells Real Cider in larger containers.
105	Supplier preference
106	Generally all small independent brewers use 30-litre containers, only a few can offer a 50-litre container
107	Some only come in smaller sizes, e.g. traditional ciders, craft beers. We have used pins of real ale in the past to minimise the risk of wastage if footfall is low
108	30-litre are all that are offered through our Pubco (Punch) in some brands (Atlantic & Staropramen)
109	It's the only size they come in
110	Pretty much all still ciders come in 20-litre bag in box. We also have Poretti which only comes in a 30-litre keg.
111	Higher strength abv lines, craft beer independent breweries utilise smaller keg sizes, keeps the offer constantly changing so more options for customers who don't want to drink the same beer week in week out
112	20-litre cider it's the only one they do
113	All that's offered by the brewer
114	A lot of microbreweries are using key kegs only
115	Sometimes order pins due to lack of footfall
116	30-litre key keg has good shelf life, 20-litre cider as slow moving
117	The smaller containers allow us to support both smaller breweries from across the country and Europe and also keep a constant and ever changing choice of new and or fresh beers for our customers.
118	footfall
119	Keep beer as fresh as possible for my customers
120	Craft beer drinkers like the turnover in product so buy smaller vessels. Buy pins for cask for freshness.
121	We serve craft beer from independent breweries which is typically supplied in 30-litre, this helps keep beer fresher and allows us to turnover our beer regularly. Our customers enjoy trying new beers so it is important we are regularly changing to new beers. We also serve bag in box cider straight from the box which is supplied in 20-litre boxes.
122	Smaller bag in boxes from cider suppliers as footfall is low and allows us to rotate and offer a selection

## The new alcohol duty system consultation response

123 Ciders are best kept and served from 20-litre bag in box
124 We stock lower runners in 30-litre kegs due to shelf life
125 Freshness, rotation, higher ABV products
126 Shelf life and footfall
127 Real ales as less in 9s
128 Shelf life of 3-5 days
129 At present serve pins of guest ales to ensure waste keep to minimum
130 Pre Covid we ran 3 ales at 9 gallons, with another beer from the brewery coming in as a guest. After Covid we have had to reduce to two ales due to footfall. Pins (4.5 gallons) would help us!!
131 Reflective of shelf-life
132 We order 4.5-gallon pins from small breweries to increase our turnover of guest beers and to try new beers so we lower the risk of losing beer if it doesn't sell as its not liked
133 Our tap room does not receive enough foot fall and larger containers are not suitable. Our cellar is not big enough to cope with larger containers.
134 To ensure that beer is always fresh and minimise wastage due to decreased footfall.
135 Footfall and variety
136 We order ciders in 20-litre for storage and range
137 30-litre kegs or 20-litre bag in box for cider are due to low turnover of product.
138 We order some cider in 30-litre bag in boxes because it suits our turnover and also allows us to vary what we sell easily
139 Need to ensure quality, not busy enough to stock beers in larger containers.
140 We're a rural pub so due to footfall
141 Bag in box draught cider. 30-litre off shore. Keeps better in smaller keg
142 footfall/demand
143 For cider it is not a huge seller and I want to keep it fresh. I would love to have pins but not all breweries do them. Will not accept larger containers
144 To allow more variety and still keep products fresh re turnover of those products. I would do more if I could get more
145 Low demand for cask means I stock 4.5-gallon to give myself flexibility and reduce wastage. I can always tap another if its popular.
146 size for turnover and quality of product
147 Reflective of foot fall and large choice of beers
148 4.5 pins used in winter to retain quality as we are a seasonal pub
149 Typically either to ensure quality or the product is niche, so small appeal & volume
150 We regularly order 30-litre kegs of keg beer and 20-litre bag in box ciders from independent small breweries, turnover is faster so beer/cider is fresher
151 Quick turn around and less waste
152 Shelf life
153 shelf life
154 I order pins on my guest beer hand pull for a better quality as with the current climate not sure how it will sell and if the government will implement new restrictions.
155 Pins/30-litre kegs ensure a good turnover of stock and consistently fresh beer.
156 We have recently started ordering 4.5-gallon casks due to less customers and throughput, so less wastage
157 9-gallon casks is best for us to sell within 3 days and 11-gallon for kegs
158 turnover of product

## The new alcohol duty system consultation response

159 Shelf-life
160 Freshness of product due to turnover
161 We don't have keg, cask only. 20-litre bag in box ciders for shelf life
162 I don't believe the supplier supplies it in a larger container but it has a short shelf life and doesn't always sell that quickly in the winter months
163 Smaller kegs to keep it fresh
164 condition
165 Availability, shelf life on Cask Ales
166 10-litre bag in box slow seller, convenient size
167 Shelf life
168 Only ale to keep it fresh as I can
169 Bag in a box cider as it is a slow seller and we need to avoid waste
170 It's reflective of footfall, however, it also offers quick turn around of all products
171 We have moved to pins due to falling real ale sales and this helps with wastage
172 To maintain quality, particularly during quieter times of the year. Some are only available in smaller sizes – the 30-litre keg – and it would be good if more brewers offered this.
173 Footfall
174 This is reflective of footfall in the venue, in and out of the season's as in a holiday area
175 Shelf life
176 We have low footfall – we are a sports club with a bar – so the small containers = better shelf life
177 We have 2 x 30-litre products. Guinness and Icebreaker IPA to maximise the quality for the footfall in these products
178 30-litre Guinness to keep the quality as it's a slow seller
179 for quieter periods to ensure less wastage
180 To keep the beer fresh, all our bag in box ciders are only 20-litres also
181 Cider usually supplied in 30-litre kegs, stronger beers (>6%) and some speciality beers often supplied in 4.5-gallon casks to reflect lower sales volumes
182 In the winter time when trade is slow.
183 Would prefer to offer two cask hand pull but not enough trade for bigger casks and can't get smaller
184 Availability, beer changes faster, freshness
185 To maintain quality
186 We have pins at present as the turnover is too low on real ale to risk a larger container
187 Certain stronger beers or test brews or even obscure flavoured beers won't sell if we have a 9 so having a pin is useful to save waste
188 Smaller gives better shelf life
189 Wastage
190 Small food-led pub with lower real ale demand pushes us towards Pins to ensure we turnover a full container in a maximum 4 day period. This in turn means we can work closely with local small-scale breweries and support the small business industry in preference to stocking mainstream brands which are generally only supplied in Firkins.
191 All 12 keg lines are 30-litre or less, to keep freshness of product and variety.
192 30-litre for Old Peculier keg as slow mover but constant
193 Throughput.
194 Some products that aren't as big a seller to keep as fresh as possible
195 we use 4.5-gallon and 30-litres as we need to products fresh

## The new alcohol duty system consultation response

196	We are a small pub with a small cellar, but want to offer a regularly changing range of local beers/ciders. Hence the 9-gallon containers.
197	Most independent breweries will mainly offer 30-litre. This size is perfect for us to allow a quick rotation of products. Our venue is not suitable for storage of larger containers
198	Most independent breweries only sell in 30-litre kegs (steel or plastic). We only stock independent and small brewery products. Additionally, we cannot fit anything bigger than a 30-litre/9-gallon down our cellar steps.
199	20-litre bag in box fits in my fridge
200	We only open fri/sat/sun so can manage the quality of the beer in smaller quantities
201	We only buy from small local independent breweries and therefore only get firkins (9 gallons) or pins (4.5 gallons). Whilst coming out of lockdown and out of the restrictions we have had to buy 4.5-gallon pins as footfall was reduced. We certainly couldn't use containers of 40 litres due to the size of our venue, location and the shelf life of the products. As our venue along with other local pubs are too small unfortunately it is clear the help given on larger containers is only of use to larger breweries and serving larger group venues.
202	Most craft breweries only offer 30-litre kegs; most cider producers only offer 20-litre bag in boxes. Some cask breweries offer Pins which we utilise for stronger beers or at slower times of year. 50-litre kegs too large to handle, don't fit in our cellar, and mean the taps don't change quickly enough.
203	We currently only operate 4 days a week so for the last day of the weeks 4.5-gallon pins are ideal. Most of the breweries I use favour 30-litre key keg. Or 20-litre if it is a higher abv product. 50-litre products becoming more common.
204	limited cellar space therefore key kegs 30-, 20- & 10-litre. traditional bitter pins due to inconsistent trade and space
205	Cellar is down steps.
206	10-litre bag in box. Can fit it in the fridge behind the bar!!
207	Ensure we sell fresh products. Also very small cold cellar
208	Stock that sells slower and small venue so storage
209	Storage
210	Health and safety does not allow 22 gallons down our cellar, The 9-gallon firkin turns over nicely
211	To ensure freshness and due to only opening at weekends
212	For ease of carrying/movement. Not all my staff are able to handle containers larger than 30 litres. Also, to increase rotation on our guest lines for greater variety.
213	We buy sizes appropriate to the throughput of products. We have no space for larger containers
214	More choice for customers, shelf life, limited storage space, not much passing trade very much a destination pub
215	Small cellar restrictions
216	Buy cider in bag in box as a special. We are a small venue in a rural village so larger specials are not viable.
217	I always have 9 ciders on. Constantly on rotation. In my cellar/fridge at 12 degrees.
218	Ice breaker duo to low volume of sales
219	Suppliers are independent craft brewers
220	Higher percentage beers coming in smaller containers
221	Supplier preference Product durability for bag in box
222	We mainly use 30-litre as we rotate most of our keg lines
223	Nearly all keg beers we serve are in 30-litre kegs. Only vessels we buy that are larger are cask ale firkins

## The new alcohol duty system consultation response

224	Only if there are too many
225	Convenient bag in box ciders
226	New draft beers preferred in pin
227	Unsuitable for larger
228	Small breweries sometimes put draught ale in polypins. Occasionally during quiet months (Jan, Feb) we may request some 9-gallon casks to be split into 2 x 4.5-gallon polypins
229	We often get bag in box cider as we don't sell a lot of the guest cider.
230	Unsuitable
231	There has been a problem with supply of 50-litre kegs for months now. Sometimes have to take 2 x 30-litre instead.
232	I use the draught master system.
233	We use smaller containers to 'test' new guest ales for popularity
234	We use corny kegs filled by suppliers