

From

Sent: 03 February 2013 18:49

To: Alcohol Consultation

Subject: Response to Alcohol Consultation

Dear Sirs,

The English Association of Self Catering Operators is the national trade association for the providers of self-catering holiday homes in England. We have responded to the consultation using the online form and the purpose of this e-mail is simply to amplify some key points.

EASCO is only involved in the topic of ancillary sales and the deregulation of them. The other subjects in the consultation are for others to answer.

Firstly, we do not believe that there should be any regulation of the sale of small amounts of alcohol as an ancillary supply to accommodation. In our case owners of holiday homes wish to provide a bottle of wine in a welcome pack, amounting in most cases to no more than a few dozen bottles of wine per year. Currently, without a licence, this could in theory result in a prison sentence. This egregious provision must be changed, as it criminalises an activity that scarcely anyone would regard as even antisocial, still less criminal, and it brings the law into disrepute. Whilst the proposal to make such small-scale supplies lawful under an "Ancillary Sales Notice", are welcome and we support them, we don't think even that more limited form of regulation is necessary or desirable, where the sale of alcohol is on a very small scale and genuinely ancillary to a holiday accommodation business.

Secondly we want to emphasise that for the change to have any value at all the ASN must be available without the need for personal licence holder or a premises licence. Either of those requirements would destroy the benefit of this change. A personal licence involves the cost and time involved in attending a formal training course, to learn what would mostly be irrelevant material for a self caterer. A premises licence involves a fee, a set of plans for which a survey is required, and a complex application. The ASM should be modelled on the successful Temporary Event Notice procedure established under the 2003 Act and there should be no additional requirements.

Tourism benefits everyone in the UK through its economic impact, especially in rural and coastal areas and in some of our great cities. Whilst the deregulation of small-scale ancillary alcohol supply is a small step to make it easier for owners to add value to a service and enhance our tourism offer, it is a step in the right direction.

We have seen some evidence of resistance to deregulation on the part of police and licensing officers who are instinctively conservative in their approach. Such conservatism should not be allowed to stand in the way of reform. The small-scale ancillary supply of alcohol does not pose any threat to public order, or any possibility of increased criminality and is no more in need of control than the sale of kitchen knives, which have far more potential for criminal misuse. No rational arguments have been advanced for the concept of such small-scale supply being regulated and such resistance is purely based on the historic fact that it has been in the past and irrational resistance to change. If HM Government is serious about reducing "red tape" then this

deregulation should proceed to the maximum extent.

