



17 February 2006

Simon Richardson
Licensing Guidance Review Team
DCMS
2-4 Cockspur Street
London SW1Y 5DH

INITIAL REVIEW OF THE STATUTORY GUIDANCE ISSUED UNDER SECTION 182

The Association of Licensed Multiple Retailers welcomes the opportunity to contribute to this initial, informal review of the Guidance. We have contributed to a joint industry submission to this initial review, prepared by the BBPA, and fully endorse the comments contained within it.

We have, however, recently held a number of workshops with operators looking at issues arising from transition and the implementation of the new regime, and we wanted to ensure that the following issues were given due prominence.

- **Slip rule:** experiences during transition revealed that there is a need for licensing authorities to have some discretion to amend minor errors on applications or to vary statutory timeframes (with agreement). There is a high degree of consensus here both within the trade and the regulatory community on this issue.
- **DPS:** in addition to the points raised in the joint industry submission, a number of our members have reported that certain licensing authorities are requiring written notification of a deputy DPS. This creates a new role not envisaged by the Act or Guidance, and appears to be carried over from the old PEL regime.
- **Licensing Summaries:** the joint industry submission highlights the problems caused when no summaries have been sent out. Our members have also reported problems with overly long summaries – sometimes 5 pages – being sent out, with the expectation that all pages will be displayed at the premises. We understood that the intention was to have a one page summary of the key points being displayed with the detail being held by a custodian on the premises and available for inspection on request.

We are aware that there are other, more substantive issues of concern amongst operators and regulators alike and note that there will be a more extensive review later this year. We believe that this is a more appropriate time to consider detailed revisions, some of which may also involve amendments to the regulatory framework.

Nick Bish
Chief Executive