RESPONSE TO GLASGOW LICENSING BOARD CONSULTATION ON DRAFT POLICY ON THE USE OF PLASTIC AND/OR TOUGHENED GLASS IN PUBLIC HOUSE AND ENTERTAINMENT LICENSED PREMISES

About the Scottish Beer and Pub Association (SBPA)

The Scottish Beer and Pub Association was originally formed in 1906. Its members are Scotland's brewing and large pub companies representing the licensed trade industry in Scotland. The main aim of the Association is to contribute to the economic and social wellbeing of Scotland through employment, investment and training.

The SPBA's members include Scottish Brewers Ltd, Tennent Caledonian Breweries Ltd, Carlsberg U.K. (Scotland) Ltd, Belhaven Group plc, The Caledonian Brewing Company, Diageo Ltd, Broughton Ales, Scottish and Newcastle Pub Enterprises, The Spirit Group, Mitchells and Butlers, Enterprise Inns, Punch Taverns & Maclay Group.

Our parent association is the British Beer and Pub Association (BBPA). Our members account for 1,500 of the 5,200 licensed public houses in Scotland.

Position

The industry is in full support of policies designed to target and tackle the violent thugs who use glass as a weapon. We equally want to work with Licensing Boards to examine what further actions we can take in contributing fully to the active management and reduction of risk in this area. Whilst recognising that the issue is a very serious one the industry opposes a blanket ban on glass on the basis that it can not be justified in terms of cost or risk and is in our opinion a totally disproportionate response to the issue. We believe that the Board's suggestion of using plastic bottles or toughened glass is best used on a premises by premises basis where problems have been identified and this approach will assist in addressing the problem in these locations.

The Glasgow Position

SBPA notes the intention of Glasgow Licensing Board to replace 95 per cent of glasses and bottles in the city's city centre nightclubs with plastic or toughened glass containers by the end of the year. The Association welcomes the opportunity of responding to the Board's proposals to extend this policy to all entertainment licensed premises across the board area "later in the year (from June 2006)" with it being then applied "finally (from January 2007) to all public houses throughout the city."

We would however dissent from the Board's suggested approach as outlined in its consultation document.

We note the comment in the Board's consultation materials that the "Board has noted statistics indicating a growing number of 'glassing' attacks in the city," but we also note that none of these statistics are actually quoted in the Board's document which we feel is a major omission given that this is the central justification for the Board's preferred approach.

Risk-based Approach

Glass related violence is perpetrated by a small number of violent individuals. 15 million UK adults regularly enjoy a relaxing, sociable drink in pubs, bars and restaurants every week without any problem whatsoever. In Scotland there are over a million visits made every week by customers to pubs. It is the small minority that should be targeted rather than reducing the enjoyment of the vast majority of law-abiding people.

To put it in context, whilst the problem of "glassing" incidents is a serious one, according to a recent article in the Glasgow Evening Times, "In Glasgow, 7500 people were victims of knife crime last year. Knives are used in six out of 10 violent crimes - dozens of murders, hundreds of attempted murders and thousands of serious assaults - in the Strathclyde Police force area every year."

Figures from press articles, suggest that Glasgow is proceeding with its proposed policy on the basis of 81 "glassing" incidents in the city, equivalent to 1.5 incidents a week which given the hundreds of thousands of people who use the city centre at weekends represents a minimal risk to those seeking to enjoy an evening out.

To put this into perspective, this compares to a total of 74 glass-related crimes were reported between April 2004 and March 2005 in Edinburgh where the city's Licensing Board has used **an alternative voluntary approach** to target premises with a "glass free" initiative in response to identified problems. At the Revolution venue in Edinburgh, there were five "glassing" incidents reported in the venue during the 2004/5 period, which was a fall from the eight in the preceding twelve months. This was despite the venue being fully "glass free," with the suggestion that customers carried glass bottles onto the premises, despite stringent security measures, which illustrates that there will practical problems enforcing any policy in Glasgow.

The Industry applies a risk-based approach, e.g. plastic is used at concerts and large outdoor events. The industry is opposed to a blanket ban on glass. Pubs are tackling potential problems by good management, including staff training, effective door policies, regular glass collection and the use of toughened glass. he Industry agrees that venues with persistent violence problems should be dealt with firmly.

Supply Chain Issues

A ban on glass bottles would end the involvement of small regional brewers in packaging and destroy their contract packaging operations as they would not be able to invest the large amount of capital required to install new lines to package in plastic. The supply chain may not be capable of scale-up in the event of a sudden increase in PET demand

Shelf-life Concerns

A number of beers are packaged in PET. New materials have been successfully development to improve the barrier properties of PET to achieve the longer shelf life needed to maintain quality to meet both consumer and retail requirements. In general though, the achievable shelf life of beers packaged in plastic is shorter than beers packaged in glass.

Environmental Considerations

Although PET bottles are recyclable, the material is used for " low grade" purposes. Glass represents a totally recyclable form of packaging, and as such is more "environmentally friendly".

In a recent letter to the Chairman of the Glasgow Licensing Board, our parent association the BBPA, pointed out that "there are environmental impacts from the current use of plastic bottles – the fact that they are non-biodegradable and cause significant levels of pollution in their disposal and the fact that choosing to produce plastic bottles rather than glass increases

levels of toxic emissions by a factor of 100. In this context it is important to note that that **this year more than 1.2 million glass bottles will be used in Scotland's on trade alone. In addition, more than 1,192,000 pints of beer alone are served in glasses every day in Scotland – 435,000,000 a year – an indicator for the number of plastic glasses that would have to be produced and disposed of annually."**

It is suspected that there is currently insufficient infrastructure in the UK to cope with the volume of re-cycling if producers were to switch to PET bottles. Research findings are that the consumer strongly believes that using glass is better for the environment.

Costs

Polymer prices are increasing due to a combination of tight supply and high oil prices. Unfortunately, due to the technological demands of bottling in plastic, it not just a straightforward matter of replacing glass bottles with plastic bottles on existing bottling lines. It would require the replacement of existing bottling lines with entirely new equipment. Even a relatively small-scale line that would be needed by a small producer would necessitate an investment in excess of £4 million. Larger producers would face much higher costs. To give some idea of the costs of such equipment, one major brewer has just invested £10 million in a new glass bottling line in the UK.

Consumer Quality Perceptions

18 million pints of beer are served across the bar each day in the UK, and 4 million bottles of wine and ¾ million litres of spirits are sold each day. Research clearly shows that consumers believe that; packaging product in glass suggests both 'quality' and 'premiumness'; that consumers prefer to drink out of glass and that drink tastes better out of glass than plastic. Plastic is unpopular with consumers as they feel it is low grade and low quality.

There maybe constraints associated with toughened glass, for example, toughened glass cannot be produced with brand marks or nucleation sites (for gas-generation in the product), thus affecting quality and presentation.

Competition Issues

A ban on glass would introduce a barrier to market for many brewing companies and competition issues need to be considered. Some types of beer are conditioned in the bottle. Replacing all bottles with plastic would damage the bottle-conditioned market

Non-discriminatory

A policy to ban glass should not discriminate between products such a measure should apply to all drinks served from and in glass in all licensed businesses.

Summary

As we stated in the introduction to this response, Scotland's beer and pub industry is in full support of policies designed to target and tackle the violent thugs who use glass as a weapon. We equally want to work with Licensing Boards to examine what further actions we can take in contributing fully to the active management and reduction of risk in this area. Whilst recognising that the issue is a very serious one the industry opposes a blanket ban on glass on the basis that it can not be justified in terms of cost or risk and is in our opinion a totally disproportionate response to the issue for the reasons outlined in our response. We believe that the Board's suggestion of using plastic bottles or toughened glass is best used on a premises by premises basis where problems have been identified and this approach will assist in addressing the problem in these locations.