



# 2008 Audit of Compliance with The Portman Group's Code of Practice on the Naming, Packaging and Promotion of Alcoholic Drinks

PIPC ref: POR090126

2009 Post-Adjudication Review Report

28 January 2009

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# 1 Introduction

As the social responsibility organisation for alcoholic drinks producers, the Portman Group has developed a Code of Practice on the Naming, Packaging and Promotion of Alcoholic Drinks which is now regarded as the principle vehicle for supporting the responsible promotion of alcoholic drinks in the UK. The Code (as it is called in this document) is designed to help producers avoid irresponsible promotion of their products. It also provides mechanisms by which complaints about such promotion can be lodged, and changes made to the naming, packaging and promotion practices judged non-compliant.

From 1996, the date of inception of the Code, through to the end of 2007, some 150 complaints had been received under the Code, though the rate of complaint had declined during this period and had averaged only seven per year over the three years to 2007. This relatively low number was generally taken to reflect high levels of compliance with the Code. However some critics claimed that it actually reflected low level of Code awareness and concerns had also been raised about the Portman Group's independence from the drinks industry.

In light of the above, the Portman Group sought an independent audit of compliance with the Code which was intended to:

- Measure levels of compliance with the Code
- Reveal if there were any particular product sectors in which problems are more pronounced
- Demonstrate that the Portman Group is proactive in seeking out and reporting potential Code breaches
- Generate complaints, if there were any, to be considered by the Independent Complaints Panel
- Strengthen Government's and other stakeholders' confidence in industry self-regulation.

The Portman Group invited PIPC to undertake this audit, submit potentially non compliant products to the Panel, and undertake a review of this whole process once the Panel's decisions had been made. This report represents the end review aspect of this work.

## **2 Method**

### **2.1 PIPC's Approach to the Work**

To achieve these results, PIPC proposed to undertake the work using a five stage approach as follows:

- Mobilisation
- Development of Evaluation Methodology
- Sampling
- Sample Evaluation
- Reporting.

Each of these is described in more detail below.

#### ***2.1.1: Mobilisation***

At the outset of the work, PIPC mobilised its team of five dedicated consultants and met with the Portman Group to review the proposed study methodology, sampling methodology and schedule. A team with high levels of personal expertise in audit, statistical analysis and alcohol-related issues was recommended to ensure that the approach taken to the work was robust and thorough.

#### ***2.1.2: Development of Evaluation Methodology***

Following mobilisation, the PIPC team returned to the Portman Group for training in the Code of Practice to gain an understanding of the current methods used to evaluate compliance with the Code. Minor refinements were made to the evaluation approach on the basis of this learning. PIPC also sought feedback from Alcohol Concern.

#### ***2.1.3: Sampling***

On agreement of the sampling and evaluation methodology (see below), a field team of two staff (for Health and Safety purposes) was sent out to each location selected via the sampling methodology (see 2.2). Relevant products (selected by the methodology) were purchased, photographed and catalogued as per the Portman Group's specification.

An interim evaluation of product compliance was made at the end of each sampling day, and communicated to the project manager, along with any identified risks, issues or observations about the audit process. After every 40 products purchased, the selection was boxed up and bubble wrapped then shipped to the PIPC offices for pre-evaluation storage.

#### ***2.1.4: Evaluation***

On return to the PIPC offices, the team evaluated each of the products purchased for compliance with each of the Rules for Naming, Packaging and Promotion (reproduced in Section 4), in accordance with the approach referred to in Section 2.1.2 above.

#### ***2.1.5: Reporting***

The study findings are presented in this report, which is an update of the March 2009 Final Report. These findings include:

- a detailed description of how the methodology was applied in practice
- a description of the evaluation/assessment process
- a results summary that provides the key metrics of audit total compliance rate and audit compliance rate by product sector, to include the final assessment by the Portman Group's Independent Complaints Panel.
- a set of schedules which contain:
  - product-specific details of the cases of potential non-compliance identified by PIPC, with each case's associated adjudication
  - referrals to industry or regulatory processes outside of the Code
  - a full list of all products sampled during the audit

## **2.2 PIPC's Sampling Methodology**

The audit required heterogeneous sets of products and outlets to be sampled and evaluated in a consistent, statistically robust and independent manner. PIPC therefore designed an approach to obtain samples of 40 products from two premises within each of the 12 major UK regions (resulting in some 480 products overall) with a further 20 products to be obtained based on a weighted internet selection process. Any null samples from the premises selection were to be substituted by additional internet samples. The methodology, which was refined with the Portman Group at the outset of the work, has three key elements as follows:

- Identification of Premises;
- Selection of Products; and
- Internet Selection.

Each of these is discussed further below.

### **2.2.1 Identification of Premises**

To ensure an appropriate spread of samples from across the UK (and allow for "regional" products within the overall sample) PIPC visited all of the UK administrative regions, namely:

- East Midlands
- East of England
- Greater London
- North East England
- North West England
- South East England
- South West England
- West Midlands
- Yorkshire and the Humber
- Scotland
- Wales
- Northern Ireland.

Within each region, the field team then randomly identify two point-of-sale premises based on the following variables:

- Location within a region: Within each region, the exact location from which the sampling took place was identified based on the town/city with largest population.
- Premises type: Within the selected authority, two premises types were randomly selected using Excel RAND function from the following:

- supermarkets;
  - grocers/convenience stores;
  - off-licences; and
  - pubs/clubs (on trade).
- Premises weighting. A weighting was applied to selection of premises, in order to give greater focus to those premises where the packaging and labelling were more commonly part of the sales proposition i.e. off-trade as opposed to on-trade where cans, bottles and barrels are less visible or completely invisible. At the Portman Group's request, the weighting was applied as follows:
    - 22/72 (or 0.3055) probability of selecting each of the first three (off-trade) premises types
    - 6/72 (or 0.0833) probability of selecting the on-trade premises.
  - Specific premises. A web search was then carried out on YELL.com against the two criteria of "located in" (input name of town/city) and "search" (input the premises types as pre-selected above). The first premises to be listed were used as the study sites, once a phone call was made to confirm eligibility as follows:
    - Premises with fewer than 10 alcoholic products in each category were not eligible.
    - Premises which did not provide confirmation of their eligibility, or did not respond to the initial phone call, were not eligible
    - Clubs or pubs which did offer alcohol, but not as "take outs" (i.e. could be stored by PIPC for 6 months, as required by the Portman Group) were not eligible.

### **2.2.2 Selection of Products**

At each premises 20 products were sampled, split into four categories, based on those used by the Office of National Statistics and in approximate proportions to the market value of the product groups as reported by the ONS in:

<http://www.statistics.gov.uk/StatBase/Expodata/Spreadsheets/D9759.xls>

The ONS product category split of beer:wine:spirits (9:7:4) was revised and reweighted at the request of the Portman Group to 9:5:4:2 beer/cider:wine:spirits:RTDs. RTD is the industry term for Ready To Drink, or pre-mixed drinks, often popularly referred to as "alcopops".

The reason for this change is that, having looked at past upheld complaints under the Code it was clear to the Portman Group that RTDs are highly represented, hence the focus on that sector as a break-out category. However, the Portman Group was unable to say the same about cider. The proposal to put cider alongside beer, rather than wine (as the ONS does), was based on the judgement that it is more similar in terms of strength and nature to beer than to either wine or spirits. Furthermore, certain surveys will group beer and cider together for monitoring purposes, for example the Smoking, Drinking and Drug Use among Young People in England surveys undertaken by the Office for National Statistics (see link below).

<http://tinyurl.com/2r8f8f>

During the confirmation phone call described in the section on selection of premises (above), the field team identified the spread of prices between lowest value and highest value items (within each product sector sampling category) available at the premises. Using Excel RAND function, a

set of prices between the lowest and highest available in that premises was generated.

The team then visited the premises and selected the items within each category with prices closest to the randomly generated prices. A running list of products was retained by the team. Where the methodology indicated selection of a product already on the list, the next available (unlisted) product, by closeness of price to the original, randomly generated price point, was substituted.

The sampling observed a ceiling price of £50 in order to keep within the Portman Group's sampling budget, avoiding unnecessary sampling of extremely expensive outliers (e.g. premium vintage wines).

### **2.2.3 Internet Selection**

In order to recognise the role of the internet as a sales channel in the UK, PIPC proposed that the final 20 products should be selected and bought online.

Using a standard search engine, the team undertook a Boolean search using the terms for product sector and "online" and "uk". Using the Excel RAND function a site was chosen from the first 1-100 displayed. Pages within the site were opened sequentially, via links on the home page, starting left menu pane, top to bottom, then right menu pane, top to bottom, then centre pane. At the first page encountered which contained a selection of products within the category, the random selection process was applied as for the physical premises i.e.

- Identify spread of prices for that product (sector).
- Randomly generate prices within that range.
- Select actual products with item prices closest to the randomly-generated prices.
- If the site didn't allow for selection using this process, another site was selected from the 100 displayed using the Excel RAND function and the process was repeated as above.

### 3 The Sampling Methodology in Practice

The application of the methodology by the field team and evaluation teams produced a specific sampling pattern described in the sections below.

#### 3.1 Actual Sampled Premises

Application of the weighted sampling methodology generated sample premises of the following types

- 8 supermarkets
- 8 off licences
- 9 grocer/convenience stores
- 1 pub

These are itemised, in the order they were visited by the field team, in the table below. Additional descriptive notes are provided for ease of follow-up and additional context.

**Table 1: Premises Sampling**

Location	Date	Premises Type	Notes
Belfast #1	25/01/08	Supermarket	A large supermarket chain outlet with a separate well-stocked alcoholic drinks section.
Belfast #2	25/01/08	Off-Licence	An average sized franchise outlet with large walk-in refrigeration for beer.
Cardiff #1	26/01/08	Grocer/ Convenience	An average sized suburban franchise outlet situated amongst high density housing. Standard of shop fitting poor.
Cardiff #2	26/01/08	Supermarket	An average sized suburban franchise outlet situated amongst medium density housing. Standard of shop fitting high.
Bristol #1	26/01/08	Grocer/ Convenience	A small independent outlet amongst high density housing with an average standard of shop fitting.
Bristol #2	26/01/08	Off-Licence	An average sized franchise outlet with a bias towards wine selling. Situated near a main thoroughfare in a suburban setting. High standard of shop fitting.
Birmingham #1	27/01/08	Grocer/ Convenience	An average sized franchise outlet with high standard of shop fittings. Situated at the heart of a housing estate in a suburban setting. Appearance of being family run.
Birmingham #2	27/01/08	Supermarket	A small independent outlet with a low standard of shop fitting. Situated on a busy urban thoroughfare amongst small, poorly maintained outlets.

Leicester #1	28/01/08	Off-Licence	A small independent outlet under recent new ownership with an average standard of shop fitting. In addition to being an off-licence, groceries were available. Situated on a busy thoroughfare in an urban setting.
Leicester #2	28/01/08	Grocer/ Convenience	An average sized outlet with a focus on selling alcoholic products and convenience foods (snacks etc). Medium standard of shop fitting. Situated at the edge of an average density urban residential estate.
Leeds #1	29/01/08	Supermarket	An average sized franchise outlet with a low standard of shop fitting and security shuttering on the exterior. Situated in a residential area amongst other small businesses. A large alcohol products section with a wide range of products. A 'bargain-bin' was present with out-of-date alcohol products available for a reduced price.
Leeds #2	29/01/08	Supermarket	An average sized chain outlet with a high standard of shop fitting. Situated in a residential suburban area, this outlet was the main focus of a small high-street.
Manchester #1	30/01/08	Grocer/ Convenience	A small franchise outlet in an urban setting amongst poor quality urban housing. A very low standard of shop fitting and limited range of products. Premises had recently changed hands.
Manchester #2	30/01/08	Off-Licence	Premises sampled to make up shortfall from first sampling location. A small off-licence with a very low standard of shop fitting and was situated in a poorly maintained urban environment.
Manchester #3	30/01/08	Grocer/ Convenience	An average sized franchise located in the city centre on a main thoroughfare. The standard of shop fitting was high.
Glasgow #1	01/02/08	Off-Licence	An average sized independent outlet with a very high standard of shop fitting and an extensive variety of products. Situated on a main thoroughfare just outside the city centre.
Glasgow #2	01/02/08	Grocer/ Convenience	An average sized franchise outlet with an average standard of shop fitting. Situated in an urban environment, but away from the main thoroughfare.
Newcastle-upon-Tyne #1	01/02/08	Pub	A large licensed premises with an average standard of bar fittings. Premises were situated on a back-street in the city centre. Very limited product range and refused to sell spirits for take-away.
Newcastle-upon-Tyne #2	01/02/08	Supermarket	An average sized franchise outlet with an average standard of shop fitting. Situated in an urban environment at the base of a high-rise housing development.

Peterborough #1	03/02/08	Supermarket	A small franchise outlet at the centre of a suburban village. Medium standard of shop fittings and small product range.
Peterborough #2	03/02/08	Supermarket	A small franchise outlet with an average standard of shop fitting. Situated in a semi-urban housing estate as part of an apartment complex.
Southampton #1	03/02/08	Off-Licence	An average sized independent outlet with a low standard of shop fitting. Appeared to be family run. An extensive grocery product range was available in addition to an extensive alcohol product range. Situated in an urban residential environment.
Southampton #2	03/02/08	Grocer/ Convenience	A small franchise outlet with an average standard of shop fitting. Situated in an urban residential environment. Limited product range.
Southampton #3	03/02/08	Grocer/ Convenience	Premises sampled to make up shortfall from first sampling location. Independent outlet with medium standard of shop fitting. Situated in an urban residential environment.
London #1	03/02/08	Off-Licence	A small independent outlet situated in an urban high street location. Medium standard of shop fitting and extensive product range.
London #2	03/02/08	Off-Licence	A small independent outlet situated in an urban environment on a main thoroughfare. Medium standard of shop fitting and extensive product range, including grocery items.

### 3.2 Actual Selection of Products

Overall, 485 Products were sampled, with 15 null samples:

- Spirits: 100
- Beers: 184
- Cider: 41
- RTDs: 35
- Wine: 125

### 3.3 Internet Selection

Physical premises provided 427 of these products, with the internet search generating the remaining 58. Null samples represented the remaining 15.

The following websites were generated via the methodology for the internet sampling:

- [www.DrinksDirect.co.uk](http://www.DrinksDirect.co.uk)
- [www.beerventures.co.uk](http://www.beerventures.co.uk)

### **3.4 Methodological Notes**

A number of non-material exceptions were generated within the sampling process and are described below.

#### **3.4.1 On-trade Sampling**

The only on-trade premises sampled was a karaoke themed bar in the city centre of Newcastle-upon-Tyne. It was sampled in the late afternoon and was almost empty of customers. The bar ran most of the length of the main area for trade, and served draught and bottled beers. A limited range of spirits was on offer, in addition to a limited range of RTDs and a very limited range of wines (both full and quarter bottles). The bar manager refused to sell spirits for take-away and all of the beers available were sampled at previous locations. Two different flavours of RTD were requested, but upon opening the bag provided by the bar to carry the drinks, it transpired that they had provided two identical RTDs.

An attempt was made to buy spirits over the counter at a nearby pub, but the manager there advised that no pub premises in Newcastle would supply spirits over the counter for take-away.

#### **3.4.2 Null samples**

Where the field team was unable to take an appropriate sample product at any of the premises a unique sample number was entered in the database and a “null” recorded, with a direct substitution deferred until the internet search element of the methodology could be applied.

In applying the internet search methodology, the field team applied a variety of (non-prejudicial) search terms to identify substitute RTDs, however after multiple attempts, a shortfall of 15 RTDs was still outstanding. These are therefore permanently recorded as null samples on the database.

As a consequence, the full complement of retained samples and the denominator against which all compliance rates are calculated is 485, rather than the 500 which the Portman Group had originally requested.

#### **3.4.3 Mis-samples**

There were three mis-samples.

The first mis-sample was made in Cardiff when a bottle of cider was mistaken for an RTD. At that location there were no other RTDs available that had not been sampled previously, and so, the integrity of the sampling methodology was not affected. The sample was left in the database for transparency.

The second mis-sample made was an 'alcohol free' beer purchase in Leeds. It was sampled in error.

The third and final mis-sample made was in Newcastle-upon-Tyne, where, as mentioned above, two distinct flavours of RTD were requested, but after leaving the premises, two identical RTDs were found to have been supplied. The database contains one entry for RTDs at the Newcastle site, the second mis-sampled RTD was labelled as such.

## 4 The Evaluation and Assessment Process

The sample was evaluated against the 11 Code of Practice criteria (reproduced below):

### The Portman Group Code of Practice

- 3.1 The alcoholic nature of a drink should be communicated on its packaging with absolute clarity.
- 3.2 A drink, its packaging and any promotional material or activity should not in any direct or indirect way:
- (a) have the alcoholic strength, relatively high alcohol content, or the intoxicating effect, as a dominant theme;
  - (b) suggest any association with bravado, or with violent, aggressive, dangerous or antisocial behaviour (though sponsorship of activities which may be dangerous after alcohol consumption, such as motor racing or yachting, is not in itself in breach of this clause);
  - (c) suggest any association with, acceptance of, or allusion to, illicit drugs;
  - (d) suggest any association with sexual success;
  - (e) suggest that consumption of the drink can lead to social success or popularity;
  - (f) encourage illegal, irresponsible or immoderate consumption, such as drink-driving, binge-drinking or drunkenness;
  - (g) urge the consumer to drink rapidly or to “down” a product in one;
  - (h) have a particular appeal to under 18s (in the case of sponsorship, those under 18 years of age should not comprise more than 25% of the participants, audience or spectators);
  - (i) incorporate images of people who are, or look as if they are, under twenty-five years of age, unless there is no suggestion that they have just consumed, are consuming or are about to consume alcohol;
  - (j) suggest that the product can enhance mental or physical capabilities.

A number of products were assessed as potentially non-compliant by the PIPC audit team. The assessment was then refined in a 3-stage process.

### 4.1 Stage 1 – Alternative Referral

Of this group, a subset of products was assessed to be potentially in breach of basic labelling requirements under the Food Labelling Regulations (1996). As such these were referred to the relevant regulatory body as the appropriate mechanism for addressing the particular issue and these were not subsequently treated as potentially non compliant for the purposes of this assessment. These are described in Schedule B.

Additionally a smaller subset of products, for a disparate set of reasons (geographical origin, ambiguity of packaging status etc), was tackled through a separate, non-referral process. These are described in Schedule C.

## **4.2 Stage 2 – Engagement by the Portman Group secretariat**

The remaining potentially non-compliant products were then earmarked for referral to the adjudication process of the Independent Complaints Panel. The Portman Group Advisory Service contacted the producers of these products, alerting them to PIPC's observations and offering advice on how the packaging could be amended to comply with the Code.

Producers were given four months to undertake remedial changes to the name or packaging of the product to prevent the referral.

## **4.3 Stage 3 – Independent Complaints Panel adjudication**

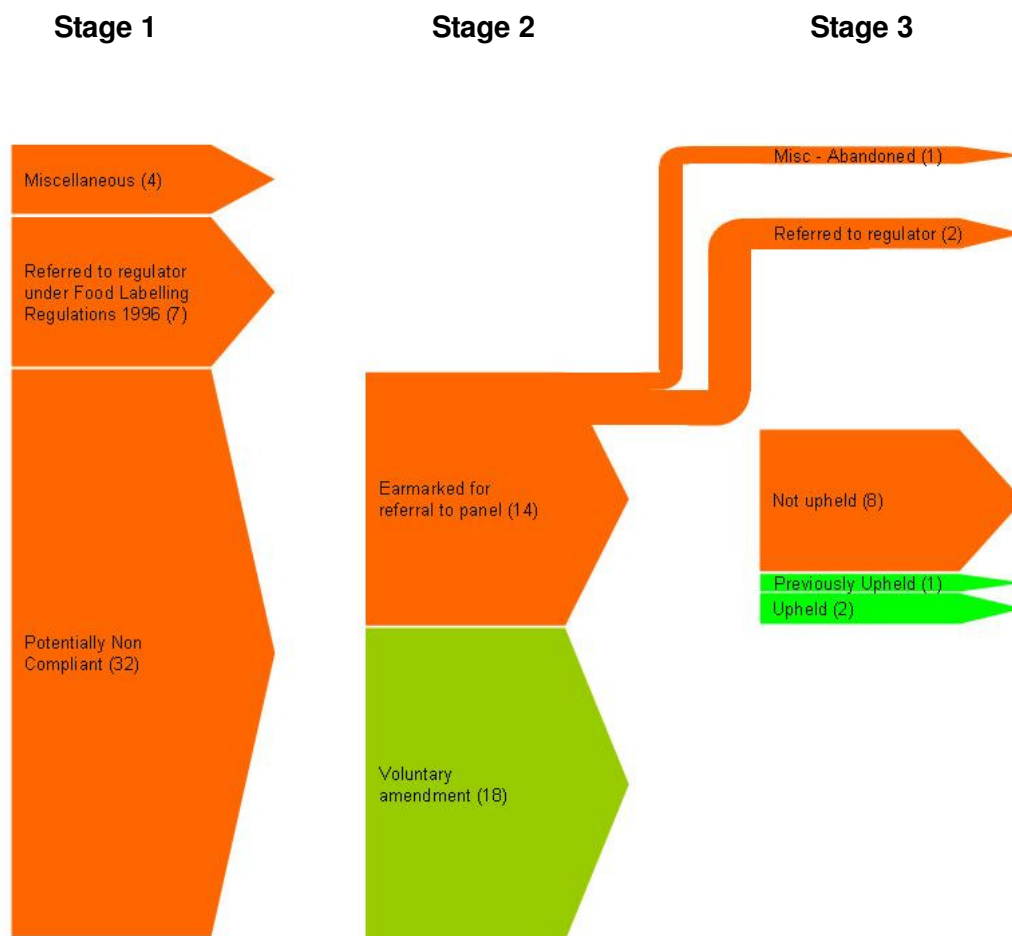
Four months later, PIPC consulted with The Portman Group to determine each company's actions in response to PIPC's observations.

Where PIPC was satisfied that the producer had taken appropriate remedial actions the file was closed.

The products to which, in PIPC's view, insufficient or inappropriate remedial changes had been made, were put forward as formal complaints to the Portman Group's Independent Complaints Panel for formal adjudication of compliance with the Code.

## 5 The Evaluation Results

The three stage process of audit evaluation is illustrated below, including the absolute numbers of products handled during each stage



### 5.1 Audit Compliance

Based on the above figures, the Code of Practice compliance rates are calculated as follows:

Numerator = the total number of products sampled less (the number of products voluntarily amended plus the number of products adjudicated as non-compliant by the Complaints Panel) =  $485 - (18 + 3) = 464$

Denominator = the total number of products sampled = 485

#### 5.1.2 Compliance – overall

The results of the assessment suggests a background compliance rate of 464/485, or just over 95.6%. If we treat the formal Panel adjudication stage as our measure of compliance, i.e. if the impact of the Portman Group's Advisory Service is factored in, the compliance rate is increased to 482/485 or 99.4%.

In addition, many products have embraced the best practice guidance covering information on units labelling and promotion - of the products sampled, 64 included a reference to the drinkaware website, a rate of 13.2%. There were also many samples that included a warning against drinking in pregnancy.

The most common Code issue, as assessed at stages 2 and 3, is 3.1 – “the alcoholic nature of a drink should be communicated on its packaging with absolute clarity”. The next most frequent Code issue, as assessed at stages 2 and 3, is (jointly) undue emphasis on the strength or intoxicating effects of the product (3.2a) and the appeal to underage drinkers (3.2h).

### **5.1.3 Compliance – by product sector**

The background compliance rate, by product sector, as assessed at stages 2 and 3, is as follows:

- Spirits 97%
- Beers 95%
- Ciders 95%
- RTDs 89%
- Wines 100%

## Schedule A – Products Identified in Stage 1 as Potentially Non-Compliant

The table below details PIPC’s observations on each product initially identified as Potentially Non-Compliant in Stage 1 and indicates the final outcome in Stages 2 and 3.

Product	Producer	Compliance Code Rule(s)	Assessed reasons for potential non-compliance	Outcome
TVX Party Pack	Intercontinental Brands (ICB) Ltd	3.1	On the outer packaging there is no indication that the bottles enclosed contain alcohol, and the orientation of bottles inside the pack prevents the ABV% from being easily seen. The description also references it as a party pack which, alongside the multi-coloured nature of the liquids could lead to it being confused with soft drinks.	Amended voluntarily (Stage 2)
Belarus Ice Iron Brew	Belarus Bottling Company Ltd	3.1 and 3.2h	The colour and presentation of the bottle does not stand out clearly as an alcoholic drink and could be confused with non-alcoholic Irn-Bru, which is a soft drink of particular appeal to under 18s.	Amended voluntarily (Stage 2)
Stryke	Nisa-Today's (Holdings) Ltd	3.2b	The product contains imagery of daggers and snakes on both sides of the can. Along with the name of the product, this suggests violence or anti-social behaviour	Amended voluntarily (Stage 2)
Strongbow Super Extra Strong	Scottish & Newcastle (UK)	3.2a and 3.2b	The multiple references to the word "strong", supplemented by "super" makes strength a dominant theme. The main image on the label implies bravado or aggression and was not in line with more common stylised archer branding used on other Strongbow products.	Amended voluntarily (Stage 2)
Snowball, Lemon Advocaat and Lime	Constellation Europe Ltd	3.1	The alcoholic nature of the product is not clear as advocaat is considered unlikely to be universally recognised as an alcoholic product. The product is considered more likely to be identified as a soft drink by referring to the contents as lemonade and lime and using language which refers to the taste using the childlike terms "tasty and tingling".	Amended voluntarily (Stage 2)
Lech	Miller Brands (UK) Ltd	3.1 and 3.2j	The product contains relatively limited English text, which prevents the alcoholic nature of the product from being communicated with absolute clarity. In the evaluators' view, canned products in particular need to be explicit as increasingly energy drinks are produced in similar sized cans. Of the relatively limited English on the can, the tagline "make things happen" suggests consumption of the product gives the drinker capabilities which they would not otherwise have.	Amended voluntarily (Stage 2)
Bacardi Breezer Pineapple	Bacardi-Martini Ltd	3.1	Resembles a fruit drink in this large bottle and there is no explicit mention of alcohol on the front. It is questionable whether potential consumers would recognise that Bacardi is an alcoholic drink rather than a brand name under which alcoholic and non-alcoholic products are marketed.	Amended voluntarily (Stage 2)
Bacardi Breezer Bursting Blueberry	Bacardi-Martini Ltd	3.1	The product looks like a fruit drink with the emphasis on "half sugar" and no explicit information that it contains alcohol. The half sugar emphasis may send the message that it is a health drink or diet product.	Amended voluntarily (Stage 2)

Crest Super Premium	Wells & Young's Brewing Company	3.2a	The strength of this product is a dominant theme in the wording.	Amended voluntarily (Stage 2)
Godfrey's Butterscotch Schnapps	Passionate Spirits	3.1 and 3.2h	The name of the product associates the product with sweets - which has a particular appeal to under 18s. The labelling does not explicitly indicate that the product contains alcohol. It is questionable whether potential consumers would recognise schnapps is an alcoholic drink rather than a brand name under which alcoholic and non-alcoholic products are marketed. Indeed, the shape and angle of "Schnapps" wording is very similar to Schweppes - a non-alcoholic brand.	Amended voluntarily (Stage 2)
Aftershock Shooter Liqueur	Beam Global Spirits & Wine	3.2g	The description on the bottle refers to it as a "shooter" - i.e. to be downed in one. Encouraging consumers to drink rapidly is explicitly prohibited under the Code.	Amended voluntarily (Stage 2)
Jagermeister	Cellar Trends	3.1 and 3.2g	On the back of the bottle there is a reference to taking this product as a shooter, which encourages rapid drinking. It is also questionable whether potential consumers would recognise that herb liqueur is an alcoholic drink.	Amended voluntarily (Stage 2)
Pulse	Merrydown plc	3.2j	This product is contained in a green plastic bottle often associated with carbonated water. Both the name and the image of a pulse line, with reference to rhythm suggest a healthy active lifestyle and imply enhanced mental or physical benefits.	Amended voluntarily (Stage 2)
Zlaty hrad	Van Pur S.A	3.1	Most written information on the can is in an east European language, and insufficient English is present to confirm it is an alcohol product. In the evaluators' view, canned products in particular need to be explicit as, increasingly, energy drinks are produced in similar sized cans.	Amended voluntarily (Stage 2)
Pheasant Plucker	The Original Cider Company Limited	3.2h	This product has a dominant cartoon image on the bottle. The name, cartoon and the rhyme could have a particular appeal to under 18s.	Amended voluntarily (Stage 2)
1488 Whisky Ale	VC2 Brands	3.2f	Information on the back of the product recommends that this product be drunk with a chaser, potentially encouraging immoderate drinking.	Amended voluntarily (Stage 2)
Otter Claus	Otter Brewery Ltd	3.2f	The label encourages irresponsible drinking by asking "how many bottles can you drink and still say it?" on the side.	Amended voluntarily (Stage 2)
Kestrel Super Strength Lager	Wells & Young's Brewing Company Ltd	3.2a	The can has strength as a dominant theme in its imagery of a bird of prey and use of strength-focused language.	Amended as part of separate complaint

Product	Producer	Compliance Code Rule(s)	Potentially Non-Compliant	Outcome
Skull Splitter	Sinclair Breweries Ltd	3.2b	The name "Skull Splitter" implies both violence and also the impact the strength may have on the drinker. Additionally there is a picture which could be seen to reinforce the aggressive theme.	Referred to ICP - Not upheld (Stage 3)
Rip Tide	Brewdog Ltd	3.2b	The product is described as a "twisted merciless stout" associating its consumption with anti-social behaviour.	Referred to ICP - Not Upheld (Stage 3)
Hop Rocker	Brewdog Ltd	3.2j	Description of the product includes "nourishing food stuff" and "magic is still there to be extracted from this drink" implying it could enhance mental or physical capabilities.	Referred to ICP - Not upheld (Stage 3)
Hogsback Old Tongham Tasty	Hogs Back Brewery Ltd	3.2f	Text on the side of the label reads "go over the top", which can be interpreted as encouraging immoderate consumption.	Referred to ICP - Not Upheld (Stage 3)
Punk IPA	Brewdog Ltd	3.2b	This product is described on the label as an "aggressive beer" thus associating its consumption with anti-social behaviour.	Referred to ICP - Not upheld (Stage 3)
Hogsback Brewster's Bundle	Hogs Back Brewery Ltd	3.2h	The front label has a prominent image of a cartoon baby which could appeal to under 18s.	Referred to ICP - Not Upheld (Stage 3)
Monte Alban	Constellation Europe Ltd	3.1	Most written information on the bottle is in Spanish, and insufficient English is present to confirm it is an alcohol product, aside from a detachable label.	Referred to ICP - Not upheld (Stage 3)
Red Square Reloaded	Halewood International Ltd	3.2c and 3.2e	The labelling describes this drink as "Ibiza in a bottle" which has strong associations with a socially successful lifestyle for younger people. In addition, the word "loaded" or "reloaded" are terms used for drinking to excess or types of drug using methods.	Referred to ICP - Not upheld (Stage 3). NB: "Ibiza in a Bottle" amended prior to case referral
Delirium Tremens	James Clay & Sons (Importer)	3.2a	The name of the beer emphasises its intoxicating effect i.e. after having drunk this product the person could experience the DT's (shakes). The images on the label also have reference to hallucinations that often are associated with the withdrawal from alcohol and hallucinations linked with intoxication (pink elephants). However, it is understood that the Independent Complaints Panel have already reviewed this product and found it to be in breach of the Code.	Product previously upheld - sample in breach of Retailer Alert Bulletin. Product removed from sale by the retailer
Big Beastie	Inverhouse Distillers	3.2h	The striking colours of the bottle and the spider and web imagery is childlike and is considered to have a particular appeal to under 18s.	Referred to ICP – Upheld
Red Star Plus	Intercontinental Brands (ICB) Ltd	3.1	There is no mention of alcohol on the front of this product and the language on the labelling makes it difficult to also confirm it is an alcohol product.	Referred to ICP – Upheld

## **Schedule B - Food Labelling Standards Referrals**

Seven samples were initially identified as potentially non-compliant under Code section 3.2f. Further discussion of these products indicated that the complete absence of English means that they are in breach of the Food Labelling Regulations (1996). All the following products were brought to the attention of the Food Standards Agency rather than tackled under the Code of Practice.

**Product: Zubr**

**Product: Tyskie**

**Product: Jenlain Bière de Noel**

**Product : Leffe Radieuse**

**Product: Peroni – Gran Riserva**

**Product: Piraat**

**Product: Mahou**

After consultation with the Portman Group's advisory service, in the third stage of evaluation the can of Zywiec and the sampled Peroni Red bottle were added to this list.

**Product: Zywiec**

**Product: Peroni Red**

## Schedule C - Miscellaneous Referrals

Four products were initially identified as requiring specific treatment outside the Code of Practice through a variety of mechanisms:

**Product: Corona beer box**

**Compliance Code: 3.1**

This product was sold as a sealed box of 24 Coronas. There is no indication of the strength of the product on the outside of the box. The product has been stated in several languages, but does not clearly state the product is alcohol, relying only on the brand name.

PIPC recommends that the Portman Group clarify the position of secondary packaging under relevant alcohol marketing legislation as well as the COP and take appropriate referral measures.

**Product: Lone Star**

**Compliance Code: 3.1**

There is no clear indication of alcohol content on this item.

As it appears to be an unlicensed overseas import PIPC recommends that the Portman Group take this issue up with the appropriate government agency.

**Product: Dooley's Original Toffee and Vodka**

**Compliance Code: 3.2h**

The plastic wrapping on the bottle is reminiscent of children's confectionery such as Cadburys Creme Egg. The colour coding and the emphasis on toffee is considered likely to appeal to the under 18's.

However, it is understood that the Portman Group's independent complaints panel have already reviewed this product and found it to be compliant with the COP. PIPC recommends that no referral be made on this product.

**Product: Bundaberg Rum**

**Compliance Code: 3.1**

On the back label there is a comment about standard drinks. As this is a product from overseas the units were calculated to be different to UK units, potentially causing UK consumers to underestimate their unit intake.

This information is misleading to the consumer, however, PIPC recommends that the issue is taken forward by the Portman Group outside of the Code of Practice audit.

After consultation with the Portman Group's Advisory Service, in the third stage of evaluation, PIPC added Lucky Nites to this group in recognition of the Advisory Service's inability to find the overseas manufacturer of the product, following a global search which suggested the company had gone out of business.

**Product: Lucky Nites**

**Compliance Code: 3.2d and 3.2e**

The wording 'Lucky Nites' implies the product can aid social popularity (or indeed, sexual success)

## Schedule D – Full Database of sampled products

Red	Wine
White	Spirits
Blue	RTD
Yellow	Beer/Cider

City	Name of Product
Belfast	1698 Celebration Ale (50cl)
Glasgow	Absinth Fruko Schultz (70cl)
Leicester	Absinthion De Luxe (50cl)
Leeds	Absolut Vodka (70cl)
Newcastle Upon Tyne	Aftershock Shooter Liqueur (20cl)
Glasgow	Alize Gold Passion (70cl)
Peterborough	Alpa Premium Soave (75cl)
Internet Substitution	Amaretto Villa Luisa (70cl)
Leicester	Amber Harvest Strong Dry Cider (300cl)
Manchester	Andes Peaks Merlot 2004 (75cl)
Glasgow	Antares (75cl)
Southampton	Appletons Rum
Manchester	Aranzo Reserva 1997 (75cl)
Belfast	Archers Schnapps (70cl)
Leeds	Aruba Lime The Cream of the Caribbean (27.5cl)
London	Asahi Beer (33cl)
Belfast	Aspall Organic Suffolk Cyder (50cl)
Belfast	Bacardi Breezer (27.5cl)
Birmingham	Bacardi Breezer Bursting Blueberry Half Sugar (275 ml)
Belfast	Bacardi Breezer Half Sugar Pomegranate (70cl)
Leeds	Bacardi Breezer Tropical Orange (4 x 27.5cl)
Birmingham	Bacardi Breezer Tropical Pineapple (70cl)
Peterborough	Bacardi Breezer Watermelon (27.5cl)
Birmingham	Baileys The Original Irish Cream (100cl)
Leeds	Banrock Station Ball Island 2005 Dry White (75cl)
Southampton	Barnstormer (200cl)

Leeds	Baron Von Ritter Rheinhessen Liebfraumilch Qualitätswein bA 2006 (150cl)
Belfast	Barton & Guestier Chateaufeuf du Pape 2005 (70cl)
London	Bass shandy (33cl)
Internet Substitution	Batemans 'Dark Lord' Bitter (50cl)
Internet Substitution	Batemans 'Victory Ale'
Internet	Bath Ales 'Dark Hare' (50cl)
Internet	Bath Ales 'Gem' (50cl)
London	Beaujolais Jean P'Robert (75cl)
Belfast	Beaune Theurons (75cl)
Leeds	Becks Alcohol Free (6 x 27.5cl)
Leicester	Becks Beer (20 x 27.5cl)
Belfast	Belarus Ice Iron Brew (66cl)
Bristol	Bell's Blended Scotch Whisky, Aged 8 Years
Internet	Belvedere Citrus Vodka (70cl)
London	Berberana Temperanillo 2004 (75cl)
Bristol	Big Beastie The Ultimate Vodka drink (70cl)
Manchester	Bishops Finger Kentish Strong Ale
Internet Substitution	Black Bottle Scotch Whisky (70cl)
Leeds	Black Tower Pinot Grigio (75cl)
Manchester	Blackthorn Cider (27.5cl)
Cardiff	Blackthorn Cider (50cl)
Cardiff	Blackthorn Ice Cold filtered Cider (225cl)
Bristol	Blossom Hill White Zinfandel 2006 (75cl)
Leicester	Boddingtons Draught (18 x 44cl)
Cardiff	Boddingtons Draught Bitter (44cl)
Manchester	Bollinger Le Grand Annee 1997 (75cl)
Birmingham	Bollinger Special Cuvee (75cl)
Internet Substitution	Bombay Sapphire Distilled London Dry Gin (70cl)
Southampton	Boru Orange Vodka (50cl)
Glasgow	Bowmore Islay Single Malt Whiskey 12 year (70cl)
Bristol	Brahma Cerveja do Brasil (4 x 33cl)
Birmingham	Breaker Strong Lager, Extra Smooth
Internet Substitution	Brewdog 'Hop Rocker'
Internet Substitution	Brewdog 'Punk IPA'
Internet Substitution	Brewdog 'Riptide'
Internet Substitution	Bridge of Allan 'Ben Nevis 80/ Ale'

Internet Substitution	Bridge of Allan 'City of Stirling 80/- Ale' (50cl)
Internet Substitution	Bridge of Allan 'Glencoe Wild Oat Stout' (50cl)
Internet Substitution	Bridge of Allan 'Lomond Gold'
Internet Substitution	Bridge of Allan 'William Wallace Ale' (50cl)
Southampton	Broadoak Cider (200cl)
Southampton	Brothers Cider (50cl)
Southampton	Buckfast Tonic Wine (75cl)
Leeds	Bud Ice (33cl)
Leeds	Budweiser Budvar Czech Imported Lager ( 50cl)
Belfast	Budweiser King of Beers (24 x 20.7cl)
Leeds	Bulmers Original Cider
Southampton	Bundaberg (70cl)
Glasgow	Burnett's White Satin London Dry Gin (70cl)
Belfast	Bushmills Original Whiskey (75ml)
London	Cadet Claret (75cl)
Cardiff	Caffreys Genuine Draught (44cl)
Manchester	Campaneo Cabernet Sauvignon Rosado (75cl)
Bristol	Campo Dorado Crianza Rioja 2004 (70cl)
Cardiff	Campo Viejo Grand reserva 2000 (75cl)
Cardiff	Campo Viejo Reserva 2003 (75cl)
Peterborough	Cane Trader Rum (70cl)
Internet	Canti Chardonnay Pinot Grigio (75cl)
Belfast	Canti Negromaro Zinfandel 2006 (75cl)
Southampton	Carbon White Cider(100cl)
Belfast	Carling (12 x 44cl)
Leeds	Carling (4 x 30cl)
Manchester	Carling C2 Lager (50cl)
Manchester	Carling Premier Smooth Lager (44cl)
Belfast	Carlsberg (24 x 440cl)
Bristol	Carlsberg Edge (4 x 27.5cl)
Belfast	Carlsberg Export (20 x 27.5cl)
Bristol	Carlsberg Export (5 litre Keg)
Bristol	Carribbean Twist Mixed Mango (70cl)
Bristol	Carta Negra Ron Superior Rum (70cl)
Glasgow	Casa della Ermita 2006 (75cl)
Newcastle Upon Tyne	Casa Tecopilla Chilean Cabernet Sauvignon 2006 (75cl)

Glasgow	Castillo Viento Rioja (75cl)
Southampton	Castlemaine XXXX (44cl)
Leicester	Castlemaine XXXX (50cl)
Bristol	Castlemaine XXXX (8 x 44cl)
Bristol	Castllo De Liria 2001 (25cl)
Leicester	Charles Courbet Champagne Speciale Cuvee (75cl)
London	Chateau Bouscasse 2001 (75cl)
Glasgow	Cheetah Lager (33cl)
Southampton	Chekov Ice Lime (27.5cl)
Southampton	Chekov Ice Orange (27.5cl)
Southampton	Chianti 2006 (75cl)
London	Chimay Beer (33cl)
Birmingham	Chivas Regal Premium Scotch Whisky 12 years (70cl)
Bristol	Christian Dupree The Napolean Brandy (20cl)
London	Christoff Champagne (75cl)
Southampton	Classic Gold Cider (200cl)
Peterborough	Claymore Whisky (70cl)
Southampton	Cobra Beer (50cl)
Bristol	Cobra Premium Beer (4 x 33cl)
Leeds	Cobra Premium Beer (66cl)
London	Cockspur Fine Rum (70cl)
Leeds	Codorniu Vintage Cava
Southampton	Cointreau
Southampton	Concorde (75cl)
Belfast	Connemara Cask Strength Peated Single Malt Irish Whiskey (70cl)
Belfast	Coors Light (10 x 30cl)
Leicester	Corona Extra (24 x 33cl)
Leicester	Corona Extra (33cl)
Leicester	Courvosier Le Cognac de Napoleon (5cl)
Leicester	Crest Super Premium Lager (50cl)
Manchester	Crianza 2004 Ursa Maior (75cl)
Manchester	Cusquena Cervecas Imported Beer (33cl)
Leicester	DAB Original Dortmunder (4 x 44cl)
Internet Substitution	Dark Star 'Espresso' (50cl)
Bristol	De Brissar Champagne Brut Rose (75cl)
Peterborough	De Gramont French Spirit (70cl)

Peterborough	De Kuyper Cherry Brandy Liqueur (70cl)
Internet Substitution	DeKoninck 1833 (25cl)
Glasgow	Delirium Tremens (33cl)
Leicester	Desperado Beer (33cl)
Birmingham	Diamond White Strong Cider (50cl)
Cardiff	Dinet Peuvrel and Fils Carte Or (75cl)
London	Disaronno Originale (50cl)
London	Discovery Beer (50cl)
Newcastle Upon Tyne	Dooley's Original Toffee and Vodka (70cl)
Internet Substitution	Dorothy Goodbody's 'Country Ale' (50cl)
Glasgow	Double Dutch Lager (50cl)
Birmingham	Dragon Stout (28.4cl)
Manchester	Drambuie (75cl)
Manchester	Dutch Lager (44cl)
Southampton	Duval Leroy Champagne (75cl)
Internet	Duvel (33cl)
Peterborough	Echo Falls Sparkling White Zinfandel (75cl)
Southampton	Efes (33cl)
Internet	Egervin Bulls Blood 2003 (75cl)
Glasgow	Erdinger Weisbeir (50cl)
Glasgow	Estrella Damm (33cl)
Birmingham	Faustino V Reserva (75cl)
Birmingham	Faustino V Rioja (75cl)
Cardiff	Finest Brandy
Cardiff	Finest Reserve Scotch Whisky
London	Fonfotin Fleurie 2205 (75cl)
Belfast	Fosters (24 x 44cl)
Newcastle Upon Tyne	Foster's Export Premium Quality Lager (50cl)
Cardiff	Fosters Twist Premium Lager (4 x 33cl)
Cardiff	Freixenet Traditional Method Cava Medium Dry Cordon Negro (70cl)
Cardiff	Frosty Jacks Cider (300cl)
Glasgow	G Vine Gin de france (70cl)
Cardiff	Gallo Family Vineyards Cabernet Sauvignon 2006 (75cl)
Bristol	Georges Dubceuf Flueurie 2006 (75cl)
Leicester	Glenfiddich Special Reserve Single Malt (70cl)
Birmingham	Glen's Vodka (100cl)

Leeds	Godfrey's Butterscotch Schnapps Premium Blend (70cl)
Peterborough	Gold Label Very Strong Special Beer (33cl)
Bristol	Grand Bernadine French Brandy (35cl)
Birmingham	Grants Finest Scotch (100cl)
Cardiff	Grolsch Premium Lager (44cl)
Newcastle Upon Tyne	Grolsch Premium Lager (71cl)
Cardiff	Grolsh Premium Lager (8 x 30cl)
Manchester	Guinness Export Beer (32.5cl)
Belfast	Guinness Draft (18 x 44cl)
Birmingham	Guinness Foreign Extra (33cl)
Bristol	Guinness Original (4 x 44cl)
Leeds	Guinness Original (500ml)
London	Gulder Beer (33cl)
Internet Substitution	Hambleton Ales 'Nightmare' (50cl)
Birmingham	Hardy's Nottage Hill Cabernet Shiraz 2004 (75cl)
Peterborough	Hardy's Voyage Cabernet Sauvignon 2007 (75cl)
Belfast	Harp (12 x 44cl)
Peterborough	Hawkes View Merlot (75cl)
Bristol	Heineken Draught Keg (500cl)
Leeds	Heineken Premium Quality Lager Beer ( 65cl)
Belfast	Hennessy VS Cognac (70cl)
Manchester	Henri La Fontaine Chablis (75cl)
Birmingham	Hereford Orchard Farmhouse Dry Cider (250cl)
Leeds	High Commissioner Old Scotch Whisky (20cl)
Belfast	Hoegarden (33cl)
Internet Substitution	Hogsback 'Brewster's Bundle'
Internet Substitution	Hogsback 'Old Tongham Tasty'
Internet Substitution	Hogsback 'T.E.A' (50cl)
Internet	Hogsback 'Wobble in a Bottle' (27.5cl)
Leicester	Holsten Pils
Leicester	Holsten Pils (8 x 27.5cl)
Internet Substitution	Hook Norton '12 Days' (50cl)
Internet Substitution	Hook Norton 'Hooky Bitter' (50cl)
Leicester	HSL Super Strength Lager (50cl)
Bristol	Imperial Ice Vodka Beverage (70cl)
Peterborough	Imperial Stag Whisky (20cl)

Manchester	Imperial Vodka (20cl)
London	Irish Meadow (70cl)
Peterborough	Island Magic Rum (35cl)
Birmingham	J and B Old Scotch Whisky
Leicester	Jacobs Creek Cardonnay Pinot Noir Brut Cuvee (75cl)
Bristol	Jacob's Creek Chardonnay vintage 2005 (75cl)
Leicester	Jacobs Creek Sparkling Rose (75cl)
Newcastle Upon Tyne	Jagermeister 70cl)
Leeds	Jameson Irish Whiskey (70ml)
Glasgow	Jenlain Noel Biere (33cl)
Cardiff	John Smiths Original Bitter
Cardiff	Johnnie Walker Black Label Old Scotch Whisky Extra Special Aged 12 Years (70cl)
Leeds	Jose Cuervo Especial (50cl)
Leicester	Joseph Jones and Co Strong Ale (50cl)
Birmingham	JP Chenet Cinsault-Grenache (75cl)
Newcastle Upon Tyne	JP Chenet Colombard Chardonnayt (25cl)
Birmingham	K Cider (50cl)
Birmingham	Kestrel Super Stregth Very Strong Lager (50cl)
Belfast	Kilkenny Irish Beer Draft (50cl)
Glasgow	King Cobra Beer (75cl)
Leeds	Kingfisher Premium Lager Beer (12 x 66cl)
Leicester	Kirov Imperial Vodka (20cl)
Birmingham	Koppaberg Premium Cider (50cl)
Cardiff	Kronenbourg 1664 (4 x 30cl)
Cardiff	Kronenbourg 1664 (66cl)
Leeds	Kronenbourg Blanc White Beer (50cl)
Newcastle Upon Tyne	Kumala Colombard Chardonnay (75cl)
London	KWV Cabernet Sauvignon 2004 (75cl)
Internet	La Fee Absinth (50cl)
Cardiff	Lambrini Cherry Special Edition (75cl)
Glasgow	Lamot Pils Beer (50cl)
Belfast	Lan Rioja Reserva (150cl)
Bristol	Lanson Champagne Black Label Brut (75cl)
Belfast	Laurent Perrier Brut (75cl)
Newcastle Upon Tyne	LCL Pils Premium Lager (50cl)
Bristol	Le Montarlet Sancerre 2006 (75cl)

Southampton	Le Piat d'Or Medium White (75cl)
Manchester	Lech Premium (50cl)
Birmingham	Lech Premium (50cl)
Leeds	Leffe beer (75cl)
Internet	Leffe Radieuse (33cl)
Internet	Leffe Tripel (33cl)
Manchester	Legavulin Single Isle Malt Whiskey (70cl)
Newcastle Upon Tyne	Lelac Champagne Brut Rose (75cl)
Glasgow	Little creature Pale Ale (33cl)
London	Lobkowitz Beer (50cl)
Cardiff	London Gin Special Dry (35cl)
London	London Pride Ale (50cl)
Cardiff	London Silk Special Dry Gin (70cl)
Glasgow	Lone Star (35.5cl)
Leeds	Louis Daumont Champagne Reserve Brut (75cl)
London	Lowenbrau Original (50cl)
London	Lucky Nights
London	Luxardo Sambucca (70cl)
Southampton	Lynx Royal Lager (50cl)
Bristol	Lynx Super Lager (50cl)
Bristol	Magners Original Vintage Cider (75cl)
Internet Substitution	Mahou (33cl)
Leicester	Malibu Caribbean Rum with Coconut (70cl)
Leicester	Marcel Hubert Medium Dry Red (75cl)
Peterborough	Marques de Sardana Cava (75cl)
Birmingham	Marques des Caceres (75cl)
Cardiff	Marquis Duperray
Birmingham	Martell VS Fine Cognac (70cl)
Leeds	Martini Asti (75cl)
Southampton	Martini Extra Dry (75cl)
Cardiff	Masterpeace Cabernet by Andrew Peace 2005 (70cl)
Glasgow	Mateus Rose (75cl)
Belfast	McEwan's Export (50cl)
Leicester	Mercante Veneziano Pinot Grigio 2006 (75cl)
Southampton	Mercier Champagne (75cl)
Birmingham	Merrydown Vintage Premium Cider (100cl)

Belfast	Miller (20 x 44cl)
Belfast	Miller Draft (24 x 33cl)
Peterborough	Minervois (75cl)
London	Mixed Doubles Rum and Cola (20cl)
London	Moet & Chandon Brut Imperial (37.5cl)
Belfast	Moet & Chandon NV Rose Imperial (75cl)
Belfast	Moet and Chandon Grand Vintage Champagne 2000
Internet Substitution	Monte Alban Mezcal Con Gusano with Agave Worm (70cl)
Belfast	Morgan's Spiced Dark Rum
Leeds	Morland Old Speckled Hen (50cl)
Birmingham	Mudshake Strawberry Vodka mix (4x 27cl)
Manchester	Murphy's Draft (44cl)
Leeds	Namaqua Dry White Wine (300cl)
Manchester	Napoleon Dauphine (70cl)
Bristol	Natch Original Dry Cider (200cl)
Glasgow	Negra Modello (33cl)
Bristol	Newcastle Brown Ale (55cl)
Belfast	Nicolas Feuillate Brut (75cl)
Leeds	Nobilo Marlborough Sauvignon Blanc 2006 (75cl)
Internet Substitution	O'Hanlons 'Double Champion Goldblade Wheat Beer' (50cl)
Internet	O'Hanlons 'Original Port Stout'
Internet Substitution	O'Hanlons 'Royal Oak' (50cl)
Internet Substitution	O'Hanlons 'Thomas Hardy's Ale' (25cl)
Internet Substitution	O'Hanlons 'Yellowhammer' (50cl)
Leeds	Okocim Polish Beer ( 50cl)
Bristol	Old Pulteney Single Malt Scotch Whisky (70cl)
Bristol	Olde English Medium Dry Cider (200cl)
Leeds	Olde English Medium Dry Cider (50cl)
Southampton	Omega Cider
Cardiff	Oranjeboom Premium Lager (50cl)
Internet Substitution	Otter 'Claus' (50cl)
Internet Substitution	Otter 'Head' (50cl)
Southampton	Ouzo 12 (70cl)
Peterborough	Oyster Bay 2006 (75cl)
Bristol	Passoa, Passion Fruits
Glasgow	Paul Langier Champagne 1999 (75cl)

Manchester	Paul Masson California White (75cl)
Birmingham	Paul Reisder Champagne Brut (75)
Manchester	Pedigree Exceptional Premium Ale (50cl)
Bristol	Peeterman Artois Leuven
Leeds	Pernod
Internet Substitution	Peroni 'Gran Riserva'
Bristol	Peroni Nastro Azzuro (12 x 33cl)
Internet Substitution	Peroni 'Red' (33cl)
Glasgow	Perrier Jouet (75cl)
Leeds	Peter Lehman Barossa Shiraz Grenache 2003 (75cl)
Southampton	Pheasant Plucker Cider
Birmingham	Pink Lady Sparkling Perry (75cl)
Newcastle Upon Tyne	Pinot Grigio Blush Blue Hill Valley (75cl)
Belfast	Piper-Heidsieck Champagne (75cl)
Belfast	Piper-Heidsieck Rose Sauvage Champagne (75cl)
Internet Substitution	Piraat
Glasgow	Plantation Rum Trinidad (70cl)
Glasgow	Portuguese Rose (75cl)
London	Praga Lager (50cl)
Leicester	Prince Consort Special Reserve Dark Rum (70cl)
Leicester	Prince Consort White Rum (35cl)
Newcastle Upon Tyne	Pulse Extra Strong White Cider (100cl)
Internet Substitution	Quilmes
Internet	Ravenswood Sonoma County 2004 (75cl)
Internet Substitution	RCH 'Ale Mary' (50cl)
Internet Substitution	RCH 'Firebox'
Glasgow	Red Square Apple (70cl) 299
Glasgow	Red Square Pink (70cl) 299
Cardiff	Red Square Reloaded (70cl)
Leeds	Red Square Vodka (70cl)
Leicester	Red Star Plus (27.5cl)
Cardiff	Red Stripe Jamaica Lager Beer (6 x 48.4cl)
Leicester	Reef Orange and Passion Fruit Flavour (27.5cl)
Manchester	Remy Martin Finest Champagne Cognac (70cl)
London	Rene Rutat Champagne (75cl)
London	Reshnoff Imperial Vodka (70cl)

Newcastle Upon Tyne	River Crest California Red (75cl)
Peterborough	River Wild Red (75cl)
Glasgow	RL Seals Finest Aged Barbados Rum (70cl)
Manchester	Robert Mondavi Woodbridge 2004 (75cl)
Leicester	Rosemount Cabernet Sauvignon 2003 (75cl)
London	Ruddles County Ale (50cl)
Leicester	Russian Standard Vodka (70cl)
Cardiff	Rutherglen Estates Shiraz 2006 (70cl)
Southampton	Rutherglen Shiraz 2006 (75cl)
Glasgow	Salitos Beer (33cl)
Peterborough	San Andreas Tinto (75cl)
Birmingham	San Miguel International Premium Lager (100cl)
Bristol	San Miguel Premium Beer (12 x 30cl)
Belfast	Satzenbrau Premium Pils (44cl)
Newcastle Upon Tyne	Scandia Super 8 Lager (50cl)
Glasgow	Schofferhofer (50cl)
Newcastle Upon Tyne	Scrumpy Jack Premium English Cider (50cl)
Birmingham	Sierra Tequila Silver (70cl)
Birmingham	Skol (12 x 44cl)
Peterborough	Skol Super (50cl)
Glasgow	Skull Splitter (33cl)
Belfast	Smirnoff Blue Label (70cl)
Cardiff	Smirnoff Ice Vodka Mixed Drink, Premium Ice Triple Filtered (70cl)
Leicester	Smirnoff Premium Black Ice (70cl)
Leeds	Smirnoff Premium Ice (4 x 27.5cl)
Cardiff	Smirnoff Vodka Premium Vodka (20cl)
Belfast	Smithwicks (6 x 44cl)
Birmingham	Snowball, Lemon Advocaat and Lime (4 x 11.3cl)
Glasgow	Sonoma Zinfandel 2006 (75cl)
Manchester	Soplica Polska Vodka (70cl)
Newcastle Upon Tyne	Sound D&B (27.5cl)
Birmingham	Southern Comfort
Southampton	Southern Comfort (70cl)
Cardiff	Special Vat Medium Dry Cider
Internet Substitution	St. Peter's 'Fruit Beer – Grapefruit' (50cl)
Internet Substitution	St. Peter's 'Ruby Red Ale' (50cl)

London	Star (27cl)
Glasgow	Staropramen Beer (33cl)
Belfast	Stella Artois (15 x 33cl)
Cardiff	Stella Artois Premium Lager Beer (6 x 33cl)
Internet	Stewarts Cream of the Barley
Southampton	Stolichnaya Vodka (70cl)
Leicester	Stones Bitter (44cl)
Birmingham	Stowells Cabernet Merlot (300cl)
Leicester	Stowells Italian Rose
Manchester	Stowells Tempranillo (300cl)
Manchester	Strong Diamond White Cider (27.5cl)
Manchester	Strong Dry Cider (44cl)
Birmingham	Strongbow (200cl)
Cardiff	Strongbow (50cl)
Manchester	Strongbow Jacques Cider, Fruit des Bois (25cl)
Birmingham	Strongbow Jacques Cider, Fruit des Bois (75cl)
Leeds	Strongbow Sirrus (12 x 50cl)
Cardiff	Strongbow Sirrus Smooth Cider
Bristol	Strongbow Super Extra Strong Dry Cider (50cl)
Cardiff	Stryke 5 Strong Premium Lager (50cl)
Manchester	Superbock (33cl)
Glasgow	Sweetheart Stout
London	T J Rosas Tequila Cream (70cl)
Bristol	Taboo Blue Vodka, Pineapple and Tropical Juices
London	Talisker Whisky (70cl)
Internet	Tanqueray Export Strength (70cl)
London	Tattinger Champagne Prelude (75cl)
Cardiff	Teachers Highland Cream Blended Scotch Whisky (70cl)
Bristol	Tennent's Super Strong Lager (50cl)
Internet	Terrazas (de los Andes) Reserva Cabernet 2003
Leeds	Tesco Reserva Cava (75cl)
Leeds	Tetley's Smooth Flow (44cl)
Belfast	The Balvenie Single Malt (70cl)
Bristol	The Glenlivet Single Malt Scotch Whiskey 18 years (70cl)
Belfast	The Macallan Whiskey (70cl)
Manchester	The Original Diamond White Strong (27.5cl)

Manchester	The Post Stones Chardonnay 2007 (75cl)
Leicester	Theakston Old Peculiar Ale The Legend (50cl)
Manchester	Three Barrels French Brandy (70cl)
Manchester	Thwaites Lancaster Bomber (50cl)
Peterborough	Tia Lusso Cream Liqueur (70cl)
Leeds	Tia Maria
Manchester	Tiger Beer (33cl)
Glasgow	Tomatin Single Highland Malt Whiskey (70cl)
Bristol	Torres Sangre de Toro 2003 (75cl)
Newcastle Upon Tyne	Tralcio Blanco (75cl)
Internet Substitution	Tullibardine '1488 Whisky Ale' (50cl)
Southampton	Turner Road Cabernet Merlot 2005 (75cl)
Glasgow	Tusker (50cl)
Belfast	TVX
Manchester	Tyskie (50cl)
Birmingham	Tyskie (50cl)
Leeds	V Ice Vodka Ice Mix (70cl)
Glasgow	Valdivieso Cabernet Franc 2004 (75cl)
Newcastle Upon Tyne	Valencia Dry White Wine (75cl)
Newcastle Upon Tyne	Valencia Medium White Wine (75cl)
Southampton	Valencia Red (75cl)
Newcastle Upon Tyne	Valencia Sweet White Wine (75cl)
Internet	Van Loveren Blanc de Noir (Blush) 2007 (75cl)
Internet	VB Victoria Bitter
Bristol	Veuve Cliquot Ponsardin Champagne Brut (75cl)
Birmingham	Veuve Edouard Champagne Brut (75cl)
Newcastle Upon Tyne	VHF Fortified Vodka Orange (27.5ml)
Newcastle Upon Tyne	Viborg Lager (44cl)
Newcastle Upon Tyne	Viborg Pils Strong Lager (44cl)
Newcastle Upon Tyne	Viborg Super extra strong Lager (44cl)
Leicester	Villa Radiosa Pinot Grigio Rose (75cl)
Peterborough	Vino da Tavola (75cl)
Leicester	Vitners Collection White Zinfandel California (25cl)
Bristol	VK Vodka and Cherry Mix (27.5)
Peterborough	Voddy (70cl)
Newcastle Upon Tyne	Vodka Ice Blush (66cl)

Manchester	VS Vodka Iron Brew (70cl)
Newcastle Upon Tyne	Warninks Advocaat (70cl)
Glasgow	Warsteiner Premium Verum (50cl)
Southampton	Weatherby's Bitter (50cl)
Birmingham	Weston's Scrumpy Cider 200cl)
Bristol	White Ace White Cider (50cl)
Leeds	White Lightening (200cl)
London	White Star Cider (50cl)
Leicester	White Storm White Cider (200cl)
Cardiff	White, Product of Spain, Selected by Spar
Cardiff	Whyte and Mackay Glasgow Special blended Scotch Whisky (70cl)
Manchester	William Lawsons Scotch Whiskey (70cl)
Manchester	WKD Original blue (27.5cl)
Cardiff	WKD Original Vodka Iron Brew (70cl)
Leicester	WKD Original Vodka Red (70cl)
Leicester	Wolf Blass President's Selection, Cabernet Sauvignon South Australia 2004 (75cl)
Glasgow	Wolf Blass Red Label (75cl)
Internet	Wood 'Shropshire Lad' (50cl)
Birmingham	Woodpecker (200cl)
Cardiff	Worthingtons Cream Flow Draft Bitter
Southampton	Wray and Nephew Rum Cream (20cl)
Internet Substitution	Wye Valley 'The Best 4 x 4' (50cl)
Leeds	X premium (50cl)
Leicester	Zeppelin Strong White Cider (300cl)
Southampton	Zlaty hrad (50cl)
Birmingham	Zubr 1768 (50cl)
Leicester	Zywiec Polish Beer (50cl)