

The ICBI, represents the majority of operating Irish microbreweries, and is one of a very limited number of trade organisations in Ireland which entirely represents the interests of genuine micro-and-small enterprises.

We welcome many of the measures being proposed by this Bill, including: the move to the district court for licence applications; the abolition of the licence extinguishment requirement, which we believe leads to anti-competitiveness in the market; the standardisation and extension of opening times to include the removal of Sunday trading restrictions, as well as the abolition of discriminatory wine licencing, which favours wine over our domestically-produced beer.

It is the belief of the ICBI members that the current licensing regime restricts competition and stifles innovation. The largest issue that Irish craft breweries have always faced is developing a route to market, particularly in the pub trade, a problem which has been seriously exacerbated by the onset of Covid restrictions, leaving many small breweries struggling to survive.

A significant de-regulation of the current licensing laws would lead to increased competition, as the existing barriers to entry to this sector are based on the cost and availability of licences. The current stagnation in the licensed drinks trade contrasts with the excitement of Ireland's food, café and wider hospitality sector, showing that new entrants in the market bring innovation, increased vibrancy, wider choice to consumers and an interesting, healthy and competitive market.

There is and always will be a place for the traditional Irish pub, not least due to the association for the tourism sector as well as its roots in the community, but, as a modern society we are changing and evolving, and this includes the settings in which we may want to consume both alcoholic and non-alcoholic drinks. ICBI members believe that the key to delivering on consumer demand is to open up the market to allow other non-traditional channels to serve Irish beer.

The proposed revised Producer's Retail Licence maintains the very restrictive opening hours and conditions in the existing licence. We would like to bring these hours in line with proposed off licence hours for both on and off premises consumption and to see the condition for ticketing and full tours removed.

Brewery and winery taprooms are a large part of the tourism industry in the UK, US, Canada and across Europe, and many of these small producers see visitors and sales from site as an essential part of their income and marketing strategy.

ICBI members would also like to see an easier monitoring and enforcement policy of licencing in place for the Gardaí and local authorities and would welcome such measure as mandatory training schemes for all staff selling alcohol, similar to existing schemes in countries including Australia and Canada.

The ICBI members recognise that de-regulation such as we might desire is not currently an option in the confines of the proposed Scheme of Sale of Alcohol Bill. Having outlined our position in relation to general restrictions of licensing laws as well as our stance that genuine manufacturers of craft beer should be able to easily sell their beer from their premises, we would finally like to re-emphasise a few more points from our submission to the committee:

- The proposed abolition of extinguishment requirement should also apply to off licences as checks and balances can be in place both in the granting but also possible revocation of a licence.
- Manufacturers of craft beer should be able to sell their own product at their premises under existing Manufacturer's Licence / proposed Producer's Licence. At minimum, this type of licence should extend to off sales. Manufacturers of beer should also be able to easily extend their licence to occasional community events such as local food markets. We propose opening hours for any special Producer's Licence be in line with other off licence hours.
- Though the ICBI continues to advocate that court appearances should not necessarily be required to gain a licence, the simplification and consolidation of the licence application process is welcome. The current process of application is unduly expensive; predominantly owing to the unnecessary requirement for legal representation and paid professional witnesses. We are hopeful that the requirements for these costly fees will be negated by the move to district court though.

Finally, the ICBI would like to express our thanks to the committee for inviting us to be a part of these proceedings.