Phases 2 and 3 Review of the Licensing and Registration of Clubs (Amendment) Act (Northern Ireland) 2021

CAMRA Response

November 2026

Consultation response for organisations: Phases 2 and 3 Review of the Licensing and Registration of Clubs (Amendment) Act (Northern Ireland) 2021

Introduction

Thank you for the opportunity to respond to the Phase 2 and Phase 3 Review of the Licensing and Registration of Clubs (Amendment) Act (Northern Ireland) 2021.

CAMRA is a not-for-profit volunteer organisation representing pub-goers and beer and cider drinkers. We have members and branches across all parts of Northern Ireland and have been campaigning for pubs, pints and people since 1971.

We are happy for our consultation to be published. If there is anything that we can assist with or that you would like to discuss further please don't hesitate to get in touch on campaigns@camra.org.uk .

Response to consultation questions

1. This version of the survey is for members of organisations. Can you please confirm that you are responding as a member of an organisation?

A: Yes, as a member of an organisation

2. What type of organisation are you a member of?

Other: Consumer organisation

Sections 7 and 34 – Major Events

From 6 April 2022 the Department has the power to make a 'major event order'. A 'major event order' designates an event taking place in Northern Ireland, which the Department considers will attract significant public interest as a 'major event'. An order can temporarily extend the hours alcoholic drinks can be sold (including off-sales).

An order can apply to all licensed premises (or all licensed premises of a specified kind) in Northern Ireland as a whole or a specific area(s) or any place or premises for which an occasional licence has been granted, situated on the site where the major event is taking place. Off-sales are only permitted from the place or premises at which the event is taking place.

An order can also apply to all registered clubs in Northern Ireland as a whole or in specified areas.

To date, the Department has made three major event orders: for The Amgen Irish Open golf tournament, held at Royal County Down, Newcastle, in September 2024; The Open Championship, held at Royal Portrush in July 2025; and Fleadh Cheoil na hÉireann, held in Belfast in August 2026.

For the Amgen Irish Open and The Open Championship, licensing hours were extended to permit earlier opening of licensed premises from 10.00am to 11.30pm, Monday to Saturday, and from 10.00am to 12.30am on Sundays, for the duration of the events.

For the Fleadh Cheoil na hÉireann 2026, the hours alcohol could be served was extended to 1.00am for specified licensed premises, pop-up bars operating under occasional licences granted by a court, and registered clubs within a designated core area of Belfast.

The aim of this section was to provide flexibility in licensing arrangements during major events staged in Northern Ireland in recognition of the important part they play in developing the tourism industry.

Q3. Based on the experience(s) of your organisation, do you think the policy aims of this section have been met?

Partly

Please explain your answer:

Major event provisions have shown that there is a demand for flexibility in the licensing system which isn't provided for in the existing restrictive system or by the occasional licence regime.

However, not everyone that would liked to have benefited from major events has been able to, such as smaller, local and independent breweries and cider makers; or those looking to organise temporary events and festivals to coincide with major events.

In our view the Department should consider how smaller, local and independent businesses can benefit from major events showcasing local alcoholic products that locals and tourists alike are seeking out.

We also believe that the scope of these provisions should be widened to include smaller and more localised events to avoid the measures being overly restrictive, as demonstrated by the limited number of occasions on which the power has been exercised.

At the recent Fleadh existing liquor licenses were extended out into vacant buildings and so none of the 'pop up' venues were actually new or independent businesses, and no increase in the offer of venues or drinks available to consumers.

Section 9 – Places of public entertainment: inclusion of cinemas

From 6 April 2022 cinemas can now apply to the courts for a licence to sell alcoholic drinks. Drinks can be purchased 30 minutes before a film starts, during the film, and up to 30 minutes after a film ends between 11.30am to 11.00pm on weekdays, 12.30pm to 11.00pm on Sundays and 12.30pm to 10.00pm on Christmas day. There are currently seven cinemas in Northern Ireland licensed to sell alcoholic drinks.

- Omniplex (The Avenue), Castle Court, Belfast
- Movie House Cinema, Cityside, Belfast
- Cineworld, Odyssey Pavilion, Belfast
- Savoy Picture House, Cookstown
- Movie House Cinema, Maghera, Derry / Londonderry
- Brunswick Moviebowl, Derry / Londonderry
- Movie House Cinema, Coleraine

The aim of this section was to enhance the cinema experience and create choice for consumers that is available in cinemas in other parts of the UK.

Q4. Based on the experience(s) of your organisation, do you think the policy aims of this section have been met?

Yes

Please explain your answer:

Consumers now have choice to purchase an alcoholic drink in a cinema. The number of cinemas who have taken up the licence shows that there is a demand.

The Department should now go further and modernise liquor licensing laws, as recommended by the University of Stirling's independent report, so that all entertainment, arts and cultural venues are able to easily obtain a licence to support their business, diversity their offering and sale a range of alcoholic drinks to meet consumer demand without the need for specific, restrictive categories of liquor licence.

Section 10 – Licence for off-sales

From 6 April 2022 local producers of alcoholic drinks can apply to the courts for a licence to sell their products on an off-sales basis from their own premises, other licensed premises and unlicensed premises/places (such as markets and fairs) providing certain conditions have been met.

The aim of this section was to recognise the contribution local producers make to the food and drink culture and promote enterprise and tourism by allowing them to sell their products directly to the public.

Q5. Based on the experience(s) of your organisation, do you think the policy aims of this section have been met?

Partly

Please explain your answer:

We agree that the policy has been transformational for local independent breweries and cider producers allowing them to sell their products directly to the public for the first time, instead of having to rely on other retail or on-sales businesses.

There has been widespread take-up of this provision from local producers and direct sales are a vital part of their business model. For consumers, and for reasons we outline in response to Question 6, it is one of the only ways to access products from local, independent and small producers who are effectively frozen out of the on-sales market in Northern Ireland due to the effects of the surrender principle, as outlined in the University of Stirling's independent report.

Whilst consumers wish to see full, fair access to market in the on-sales market (and whilst CAMRA wishes to see policies implemented to encourage consumption in the regulated setting of a pub, social club or taproom instead of people drinking at

home), in the meantime direct sales from producers is vital to meeting consumer demand and ensuring at least some diversity in the local beer and cider market.

Having said that, we believe the policy has only been partly met because we believe some of the restrictions for off-sales outside of a producer's own premises are overly onerous and as a result there has not been a large take-up of these provisions.

We think the Department should implement policy changes in order to allow local independent producers to sell on an off-sales basis at any external event such as a farmers' market, local fair or similar events on the same basis as local food and soft drinks producers, without restrictions or conditions on the type of event and its intended purpose.

Section 11 – Local producers' premises: suitability for on-sales

From 1 June 2022, local producers of alcoholic drinks who have been granted a liquor licence can apply to the courts to sell their products for consumption on their premises (commonly known as a taproom). Taprooms are allowed to open between 4.00pm and 10.00pm up to 104 days per year, excluding Christmas day.

The aim of this section was to support local producers of alcoholic drinks to promote enterprise and tourism in Northern Ireland.

Q6. Based on the experience(s) of your organisation, do you think the policy aims of this section have been met?

No

Please explain your answer:

The policy has failed to allow a significant number of local, independent breweries and cider producers to expand and promote their business, fulfil the needs of tourists and locals alike, or to put local beer and cider on an even keel with the way local food and soft drink businesses are supported and can meet consumer demand.

This is because the producers' on-sales licence is excessively restrictive. This is for two reasons.

Firstly, the provision has exceptionally limited opening hours and opening times. Given the costs required to set up a taproom environment, including costs with other regulatory burdens such as planning and fire regulations, it is not cost effective if the business can only open for off-sales for 104 nights a year and for only 6 hours on those occasions.

Secondly, the restriction to only selling your own produce limits the appeal of such taprooms to both locals and tourists alike. It discourages groups of people attending such a taproom if, for example, a brewery business cannot sell other products such as cider or spirits to cater for everyone's needs. Local producers are also keen to support other independent businesses. In other jurisdictions independent breweries and cider producers often sell each other's products in their own taprooms but this is prohibited under the overly restrictive provisions under this legislation.

We believe the very small take-up of the producers' licence on-sales provision is evidence of the need for further reform of this section of the Act in order to full

support local, independent producers and allow them to expand, meet consumer demand and ensure fair access to local, independent beer and cider from Northern Ireland.

There is an extremely low level of market diversity in the types of licenced premises in Northern Ireland, as evidenced by the restrictive number of licence categories and the impact of the restrictive and anti-competitive liquor licensing regime, including the surrender principle.

It is simply too expensive for small, local independent breweries and cider producers to open a viable, full-time taproom under the existing liquor licensing regime.

The current market and liquor licensing regime consists of extremely large public houses with an extremely poor diversity of choice of beer and cider, meaning the vast majority of pubs save the same brands of beer from global, multinational brewing companies. 95% of beer consumed here is not produced in Northern Ireland.

The surrender principle stifles choice of beer and cider styles and products from local and independent producers, due to restrictive tie agreements with global brewers that are a direct result of the surrender principle. This leads to a stranglehold of large, global brewing and pub-owning businesses on most taps and packaged drinks on offer in the majority of pubs in Northern Ireland.

The market as it stands prevents revenue growth in experiential tourism and growth in alcohol producers offering top quality alcohol products where the focus is on taste comparison of high quality, innovate products. Instead, the system encourages large pubs focused on quantity.

The existing market also deprives consumers of having access to a wide range of venues, including specialist pubs, micropubs, wine bars and brewery taprooms which are thriving in Great Britain and across Europe.

For these reasons, it is vital that the Department considers expanding the opening days, opening hours and products available under the producers' licence to better assist local businesses and provide access to independent, locally-produced beer and cider.

In the longer term we believe that fundamental reform of the restrictive and anti-competitive liquor licensing system, including the surrender principle, is absolutely vital, as recommended by the independent review by the University of Stirling.

Section 12 – Requirement for off-licence

From 6 April 2022, where a sale of alcoholic drinks takes place in any way other than in person, the place of dispatch in Northern Ireland must be licensed to sell alcoholic drinks for off-sales, and the person making the sale, personally or by an employee, is the holder of the licence.

If the person making the delivery is not a licence holder (or an employee of the licence holder) they must make the delivery without delay and also have with them a receipt from the licence holder for the purchase of the alcoholic drink(s).

Before the law changed, there was no provision for the remote sale of alcoholic drinks, and the aim of this section was to ensure online alcohol purchases remain regulated and traceable and to address concerns around delivery of alcoholic drinks to young people.

Q7. Based on the experience(s) of your organisation, do you think the policy aims of this section have been met?

Don't know

Please explain your answer:

We do not have any evidence on whether or not the policy objectives are being achieved in practice, but we are in favour of the legislation providing a framework for the remote sale of alcohol to prevent underage consumption.

Sections 13 and 35 – Removal of requirement for children's certificates etc.

From 6 April 2022, licensed premises and registered clubs no longer need to apply to the court for, and display a children's certificate, to allow under 18s in areas of the premises which contain a bar or are used mainly or exclusively for the consumption of alcoholic drinks.

Further changes are included to ensure all safeguards remain in place before young people under 18 are allowed in areas of the premises which contain a bar or used mainly or exclusively for the consumption of alcoholic drinks. These include, that meals and beverages suitable for a young person must be available, a young person must be accompanied by an adult and sit away from the bar, and a young person must leave the premises by 9.00pm (9.30pm if having a meal purchased before 9.00pm).

The aim of this section was to simplify regulation, cost and bureaucracy in relation to the accommodation of children in licensed premises and registered clubs.

Q8. Based on the experience(s) of your organisation, do you think the policy aims of this section have been met?

Yes

Please explain your answer:

We believe that accompanied children should be allowed in pubs and clubs if the facilities are suitable, if the licensee wishes to admit them, and if the adult responsible for them judges that the pub is suitable for the child.

This change has simplified the regulatory burden for businesses by removing the need to apply for a children's certificate.

Sections 14 and 36 – Underage functions

From 6 April 2022, certain licensed premises can apply to the court to hold a function designed to appeal to young people under the age of 18, e.g. a formal or a teen disco, in a certain part of their premises. Young people can attend an underage function up to 1.00am, and remain on the premises up to 1.30am, following the

function, subject to certain conditions being met, e.g. alcoholic drinks are not available.

Those premises are:

(a) any part of premises of a kind mentioned in Article 5(1)(a) of the Licensing Order which is structurally adapted, and used or intended to be used, for the purpose of providing persons frequenting the premises with a main table meal at midday or in the evening, or both;
(b) an hotel;
(c) a restaurant;
(d) a conference centre;
(e) a higher education institution;
(f) an indoor arena;
(g) an outdoor stadium.

Registered clubs can apply to the police to hold the same type of function on their premises for members and their guests.

The aim of these sections was to allow young people under the age of 18 to safely attend alcohol-free functions in licensed premises and registered clubs provided adequate safeguards are in place and make them more financially viable.

9. Based on the experience(s) of your organisation, do you think the policy aims of this section have been met?

Don't Know

Please explain your answer:

We do not have any direct evidence or experience on the holding of these types of events.

Sections 15 and 37 – Private functions

From 6 April 2022 under 18s can remain in licensed premises and registered clubs for private functions such as birthday parties, anniversary celebrations etc., after 9.00pm on licensed premises and registered clubs (9.30pm if they have purchased a meal before 9.00pm) or 10.00pm if in sporting club premises, provided certain conditions have been met.

The aim of these sections was to allow young people under the age of 18 to safely attend private functions in licensed premises / registered clubs provided adequate safeguards are in place to protect them and ensure a safe, family-friendly environment.

Q10. Based on the experience(s) of your organisation, do you think the policy aims of this section have been met?

Don't know

Please explain your answer:

We do not have any evidence of how this provision is working out in practice. However, we believe that children should be allowed to stay at functions such as family weddings beyond 9pm, as long as the licensee and the responsible adult agrees that the venue is suitable for the child.

Section 16 – Delivery of intoxicating liquor to young persons

From 6 April 2022 it became an offence for a licensee, or their employee, to make a home delivery of alcoholic drinks to any person under 18 years of age. From this date, in court proceedings a licensee (or employee), may rely on a defence of due diligence by demonstrating that, when delivering alcoholic drinks, they recorded details of any proof of age document they had requested in the delivery book or on an invoice.

The aim of this section was to stop delivery of alcoholic drinks to people under 18 years of age by placing a requirement in law for identification to be shown and recorded if there is any doubt the person to whom the alcoholic drinks are being delivered to is not 18 years of age or over.

Q11. Based on the experience(s) of your organisation, do you think the policy aims of this section have been met?

Don't Know

Please explain your answer:

We do not have any evidence on whether or not the policy objectives are being achieved in practice, but we are in favour of the legislation providing a framework for the remote sale of alcohol to prevent underage consumption.

Section 17 – Restaurants and guest houses: notice displaying licence conditions

From 6 April 2022, the law changed to make it a requirement for a restaurant and a guest house (which has a restaurant) to display a notice detailing the conditions in relation to the sale and consumption of alcoholic drinks on the premises.

The aim of this section was to ensure that anyone entering the premises was aware that sales of alcoholic drinks are supplementary to food service.

Q12. Based on the experience(s) of your organisation, do you think the policy aims of this section have been met?

Don't Know

Please explain your answer:

N/A

Section 22 – Occasional licences: conditions

From 6 April 2022, the law was updated to allow the police to attend a court hearing for an occasional licence and ask for specific conditions to be applied to that licence.

The aim of this section was to strengthen the control of temporary sales of alcoholic drinks.

Q13. Based on the experience(s) of your organisation, do you think the policy aims of this section have been met?

Partly

Please explain your answer:

The provision has met the policy objective. However, we do not believe that the occasional licence regime is fit for purpose and believe it must be reviewed.

The existing system prevents innovation and for a range of events to be held. This includes beer and cider festivals, which CAMRA volunteers promote and organise across Great Britain, but which is much more difficult to run or run viably in Northern Ireland. This prevents a diversity of beer styles and products being offered to consumers.

The occasional licencing system should be reformed to allow those running volunteer-led beer and cider festivals – as well as cultural events, charities, organisations and events – to easily apply for a temporary licence to serve alcohol.

Section 26 – Body corporate: change of directors

From 6 April 2022, the law was updated to make it a requirement for a body corporate licence holder to notify the police and courts of any change of directorship within 28 days.

The aim of this section was to ensure the police and courts are notified at any stage during the licensing period to allow for checks to be carried out to ensure all directors remain fit to hold a licence.

Q14. Based on the experience(s) of your organisation, do you think the policy aims of this section have been met?

Don't Know

Please explain your answer:

We do not have any relevant evidence on this matter.

Section 28 – Sporting clubs

From 6 April 2022, the law changed to allow the police to temporarily authorise an extension to the area of a sporting club which serves alcoholic drinks, for a function which is likely to attract more people than could be accommodated in the premises, up to 6 times per year.

The aim of this section was to allow sporting clubs to directly benefit from the supply of alcoholic drinks at occasional events which are directly related to the objectives of that club.

Q15. Based on the experience(s) of your organisation, do you think the policy aims of this section have been met?

Partly

Please explain your answer:

This provision has given sporting clubs more flexibility. However, as with occasional licences we believe further reform is needed to allow give clubs, and other premises, the flexibility they need to hold occasional events beyond an arbitrary limit of 6 times per year.

Section 38 – Young people prohibited from bars

From 6 April 2022, the law changed to allow young people under the age of 18 to remain in the bar area of a sporting club until 11.00pm during the summer months (1 May – 30 September). In non-summer months they can remain in the bar area of a sporting club up to 11.00pm, 3 times per calendar year, to attend prize-giving ceremonies.

The aim of this section was to allow young people under the age of 18 to safely take part in club-based summer activities and prize-giving events by extending the time they can remain on club premises, supporting youth participation while maintaining appropriate safeguards.

16. Based on the experience(s) of your organisation, do you think the policy aims of this section have been met?

Yes

Please use the text box below to explain your answer.

The provision allows those under 18 to remain in a bar area. However, we believe the Department should allow these decisions to be left to individual licensees instead of limiting the number of occasions.

Section 40 – Restrictions relating to advertisements

From 6 April 2022, the law changed to allow registered clubs to advertise any function outside of club premises, providing the advertisement clearly states that only members of the club and their guests could attend the function. Advertisements relating to functions where the proceeds are devoted to charitable or benevolent purposes are not required to include such a statement.

The aim of this section was to assist clubs to reach members who do not regularly attend their club, but who may wish to attend certain events to support their club.
17.

Based on the experience(s) of your organisation, do you think the policy aims of this section have been met?

Don't know

Please use the text box below to explain your answer.

We do not have any direct experience of how this provision has worked in practice, but we welcome the ability for clubs to advertise such functions and events outside of the club premises.