

Destruction of Beer in Cellars to Reduce Risk of Environmental Damage

Introduction

The process of destruction of beer in cellars is intended to ensure that pubs are prepared for re-opening when safe to do so by allowing stock that has become unsaleable due to the COVID-19 closures to be replaced.

Beer can be destroyed in a pub only where the container can be emptied to a foul (wastewater) sewer. Most modern sites, where the cellar is at ground level, will have sluice sinks either in the cellar or in an adjacent cleaners cupboard, these should all be connected to the foul drainage system and would be an ideal disposal point.

In older sites, where the cellar is below ground level, the cellar sump pump systems cannot be relied on as many discharge to surface water systems that drain directly to the environment. At these sites beer could be disposed of via the main pot wash sinks, kitchen sinks or other waste outlets ***only if these are connected to the foul sewer system.***

Sewer System:	Disposes of:	Transferred to:
Foul (wastewater) Sewer	Toilet, bath, shower, kitchen sink, washing machine, dishwasher, etc	Local sewage treatment works
Surface Water Sewer	Rainwater from roof, driveway, patio, roads, etc	Local watercourse

Do not dispose of beer down any drain outside the premise or to a soakaway.

Pubs Not Connected to the Foul Sewer

Where pubs feed an on-site or local waste treatment plant it will not be possible to destroy beer and alternative arrangements must be made for retrieval of beer containers.

Under the Environmental Permitting Regulations 2016 it is an offence to cause or knowingly permit a discharge of polluting matter without an environmental permit that authorises the discharge. This includes discharges made to a surface water drain that connects to surface water such as rivers or streams.

Waste water treatment plants can easily be overwhelmed by additional polluting load such as beer and it is likely to be an offence under the Regulations if discharge results in pollution to the environment as a result of a waste water treatment plant being overwhelmed.

If beer can be recovered, other types of disposal; for example to treatment by anaerobic digestion, composting or direct to land are alternative waste management activities may be considered and are regulated by the Environment Agency.

Notification of Destruction

If duty is to be reclaimed, permission must first be sought from the owning brewer before any beer can be destroyed. Once this has been granted the local water wholesaler will then need to

be notified to allow them to communicate any specific conditions for destruction that are required to protect the local sewage infrastructure.

As part of this notification, wholesalers will require accurate records as follows:

- The total volume of liquid to be destroyed
- The type of liquid i.e. beer or cider
- The location (pub name and address) of emptying

The following, and expectations from applicants, have been confirmed with BBPA by the water industry:

- Permission should be sought direct from the water wholesaler who will accept:
 - Bulk submissions based on postcode areas
 - Individual submissions from licensees
 - The WaterUK postcode [search](#)¹ can be used to easily identify the local wholesaler and relevant contact details can be found within the Annex for this document.
- There will be **no fees** for destruction
- There is **no need to complete any forms or permit applications**
- Wholesalers commit to looking at applications as a priority:
 - Applications will only be refused where operational or environmental conditions prevent their approval

These are significant concessions to usual practice, whereby applications must be made via water retailers with additional forms completed and charges up to £1,500. It should also be noted that some wholesalers may have produced Regulatory Position Statements for this activity, which may avoid further notifications altogether in *some* circumstances. These should be available via their individual websites and direct links can be found within the Annex for this document.

Water Industry Act 1991

Companies and/or individuals undertaking to destroy beer in cellars are reminded that it is an offence under s.111 of the Water Industry Act 1991 to discharge anything to a sewer which will adversely impact on the sewerage network or water recycling centre treatment processes. Any discharge not covered by a permit or consent is subject to this part of the Act.

Any questions or concerns regarding the environmental considerations with regards to destruction of beer from cellars and which are not clear from this protocol should be addressed to the local water wholesaler.

Further BBPA Activity

The BBPA is continuing to seek further agreements from the water wholesalers for:

- De-minimis volumes for destruction where possible
- Agreement that notifications will be processed within 72hrs

This document will be updated as necessary to reflect further changes and based on the above.

¹ <https://www.water.org.uk/advice-for-customers/find-your-supplier/> (sewerage services supplier).

Annex 1 - UK Water Wholesalers

Wholesaler	Method of control	Method of Notification	Bulk application using Postcodes	Details required	Contact details	Link to RPS if applicable
UU	Notification for all discharges	Direct contact or Retailer	Yes	Address with full postcode, Contact name & number, Volume, Proposed start and end date of discharge	Wastebeerapplication@uuplc.co.uk	
AW	RPS for opened kegs / casks Notification via application for unopened casks / kegs.	Direct contact or Retailer	Yes	Address with full postcode, Contact name & number, Volume, Proposed start and end date of discharge	TradeEffluent@anglianwater.co.uk	Anglian Water RPS
YW	Notification for all discharges	Direct contact or Retailer	Yes	Address with full postcode, Contact name & number, Volume, Proposed start and end date of discharge	andrew.cottam@yorkshirewater.co.uk daniel.rowe@yorkshirewater.co.uk	
Severn Trent	Notification for all discharges	Direct contact or Retailer	Yes	Address with full postcode, Contact name & number, Volume, Proposed start and end date of discharge	trade.effluent@severntrent.co.uk	Severn Trent
Scottish Water	Notification for all discharges	Complete application and submit via Retailer or Scottish Water direct	Yes	Address with full postcode, Contact name & number, Volume, Proposed start and end date of discharge	teq@scottishwater.co.uk	Scottish Water RPS
NWL	Notification for all discharges	Direct contact or Retailer	Yes	Address with full postcode, Contact name & number, Volume, Proposed start and end date of discharge	trade.effluent@nwl.co.uk	
Southern	Notification for all discharges	Direct contact or Retailer	Yes	Address with full postcode, Contact name & number, Volume, Proposed start and end date of discharge	trade.effluent@southernwater.co.uk	
Southwest	Notification for all discharges	Direct contact or Retailer	yes	Address with full postcode, Contact name & number, Volume, Proposed start and end date of discharge	TradeEffluent@southwestwater.co.uk	
Thames	Notification for all discharges	Notification for unopened casks	Yes	Address with full postcode, Contact name & number, Volume, Proposed start and end date of discharge	Trade.effluent@thameswater.co.uk	
Dwyr	Notification for all discharges	Direct contact	Yes	Address with full postcode, Contact name & number, Volume, Proposed start and end date of discharge	Trade.Effluent@dwrcymru.com	
NI	Notification for all discharges (Currently seeking approval within business for a RPS covering open casks)	Direct contact	Yes	Address with full postcode, Contact name & number, Volume, Proposed start and end date of discharge	Trade-effluent@niwater.com	Will provide link if RPS is approved
Wessex	Notification for all discharges	Direct contact	Yes	Address with full postcode, Contact name & number, Volume, Proposed start and end date of discharge	Wessex Water website	