

HEALTH AND SPORT COMMITTEE – CALL FOR WRITTEN EVIDENCE ON THE ALCOHOL ETC. (SCOTLAND) BILL

The advantages and disadvantages of establishing a minimum alcohol sales price based on a unit of alcohol

ADSW supports the proposal to introduce a minimum alcohol sales price based on a unit of alcohol.

Research shows a clear, direct partnership between the price and consumption of alcohol. We believe that minimum pricing will reduce the effects of alcohol related harm in the areas of health, crime and employment.

Minimum pricing will have minimal effects on moderate drinkers. Its biggest effects on actual price will be seen in e.g. the price of high alcohol ciders, multi-pack purchases and bargain basement offers. There is compelling evidence that shows when prices rise consumption falls. ADSW believes that minimum sales price based on a unit of alcohol will, over time, reduce the population mean alcohol consumption and will have its greatest effects on those groups in the population who are currently of most concern.

On a cautionary note, ADSW is concerned that this measure may produce unwanted consequences such as increased trafficking of cheap alcohol from the European mainland and possible loss of employment in the cheap-end alcohol production industry and would advise Government of these concerns.

The level at which such a proposed minimum price should be set and the justification for that level.

ADSW notes that the explanatory notes accompanying the Bill suggest a minimum price of forty pence per unit of alcohol. ADSW believes that this should be the absolute minimum but that greater benefits will be evidenced if a higher minimum price is set. Alcohol Focus Scotland have suggested that a price of between forty five pence and fifty five pence should be set and we would support this recommendation. If a minimum price can be set then it can be reviewed in light of changing circumstances. The Scottish Government should enshrine in law the authority to review and vary the minimum price set as evidence of its effectiveness is accumulated over time.

The rationale behind the use of minimum pricing as an effective tool to address all types of problem drinking.

Research suggests that there are about 1,172,000 hazardous and harmful drinkers in Scotland and ADSW believes that the introduction of minimum pricing will impact most upon this group. Further, we believe that there will be direct and positive effects for younger, inexperienced drinkers whose disposable income is, in a majority of cases, fixed. As previously mentioned, over time we would expect this measure to impact on the population mean alcohol consumption.

Possible alternatives to the introduction of a minimum alcohol sales price as an effective means of addressing the public health issues surrounding levels of alcohol consumption in Scotland

ADSW believes that there are no alternatives to minimum pricing that will so effectively address the public health issues surrounding alcohol consumption in Scotland. ADSW further believes that the Scottish Government should not be considering alternatives but should view minimum pricing as one of a necessary range of measures aimed at tackling alcohol misuse in Scotland. We suggest that public awareness campaigns targeted at both the whole population and target groups within the population should be ongoing and nationwide, that alcohol free activities should be promoted and incentivised, schools, parents and the media should be involved in a consistent and comprehensive delivery of alcohol related education and, there should be focused preventative campaigns targeting (e.g.) proxy purchase, street drinking, irresponsible promotions and illegal trafficking of cheap alcohol.

The advantages and disadvantages of introducing a social responsibility levy on pubs and clubs in Scotland.

ADSW agrees in principle with the proposal which links those who produce and sell alcohol for a profit with a contribution to the financial costs associated with clearing up our town centres and the police services and health services required to deal with the results of alcohol abuse. However, we also believe that the current proposals are impractical in their present form. Account needs to be taken of premises who offer a valuable community resource and who are responsible providers. The proximity of (e.g.) fast food outlets and taxi ranks is often a factor in public disorder and not solely licensed premises. We are also concerned that licensees may not call out emergency services or the police if this were to be connected to future charging. Should we be considering size of premises, length of opening times, late licenses etc? In general, we believe more detailed proposals need to be brought forward for consideration around this issue.

The justifications for empowering licensing boards to raise the legal alcohol purchase age in their area to 21.

ADSW believes that there are advantages and disadvantages with this proposal. Eighteen to twenty one year olds would be encouraged to drink in licensed premises where there are a mix of age groups and trained staff making it a more controlled and safer environment. The effects of pre-loading may be reduced and the incidence of agent purchasing may also be reduced. However, whilst we agree that the underlying principles of raising the legal purchase age in off-licenses to be sound, we do believe that there should be a consistency of approach at least within and across local authority areas and most probably Scotland wide. We envisage situations where young people would travel from area to area, across authority boundaries or national boundaries to purchase alcohol. ADSW urges the Scottish Government to consider a national scheme and not leave this to local area licensing boards.

The role of promotional offers and promotional materials in encouraging people to purchase more alcohol than they intended.

ADSW agrees that the promotional offers and materials currently available do act to encourage people to purchase and consume more than they had originally intended. The introduction of minimum pricing should have a positive effect on the use of promotional offers and should see an end to (e.g.) happy hours, two for one offers, deep discounting and other such ways of encouraging purchase. ADSW believes that the Scottish Government should commission a full review and evaluation of alcohol promotion in all forms of alcohol outlets and across the media. The lessons learned from the ban on tobacco advertising and should be included in the review and applied to alcohol where applicable.

Any other aspects of the bill

ADSW would wish to make the following comments:

- Irresponsible or cut price promotions should not be permitted in any form of licensing premises and as such Section 19 of the Bill requires greater clarity
- 'Tasting sessions' as referred to in the Bill should be subject to clear guidance, control and regulation.
- Government should consider what will happen to the potential 'extra' revenue generated by minimum pricing and discuss ways of returning this to local services dealing with alcohol and its effects rather than allowing it to go into the coffers of producers and vendors.