Alcohol (Minimum Pricing) (Scotland) Bill

Highland Council

Highland Council welcomes the opportunity to provide evidence for the Committee’s consideration of the bill. This response was debated at Council on 15th December, received support from across the Council and was approved unanimously.

Alcohol is an integral part of Highland life with an industry that contributes to our economic development. In some remote and rural areas, a distillery or brewery may be the biggest or only employer. The whisky industry in particular contributes not only to the economy but also helps to attract tourists to the Highlands. However, we’ve seen over the years that the more affordable, available and acceptable alcohol has become, the more people consume resulting in increased levels of harm that impact on the quality of life across the Highlands. Many people in Highland are drinking above the recommended weekly limit, 35.2% of men and 21.1% of women. According to revised alcohol consumption levels reported in the Scottish Health Survey, a higher proportion of Highland men are drinking above the recommended weekly limit than the national average. More men in Highland (34 per 100,000) also die an alcohol related death than the national average (30 per 100,000). Over the past 10 years, the rate of hospital admission as a result of harmful alcohol use has increased in Highland, as it has done across Scotland. Rates of harm are in excess of the Scottish average and the difference between the two has widened over the past 10 years.

We are also concerned that a higher percentage of 15 year olds in Highland (88%) have drunk alcohol than the Scottish average (78%). Our own lifestyle survey of school pupils worryingly shows 8% of primary 7 pupils as having drunk alcohol in the previous week. This reflects a tendency for social attitudes in Highland to view underage drinking as a ‘right of passage’ where it is almost expected that young people will establish drinking patterns well before turning eighteen. We are concerned there is not enough awareness of the potentially detrimental effects on a young person’s mental and physical development or the increased risk of developing dependency problems later in life when drinking is established at an early age. The affordability and availability of alcohol has also resulted in it becoming increasingly acceptable for parents to model hazardous and harmful drinking to children and young people in many households across Highland.

Alcohol Concern estimates that between 80,000 – 100,000 children are likely to be living in families where one or both parents are dependent on alcohol. We do not currently have an estimate of the numbers of children affected in Highland, but are aware the numbers are likely to be substantial and that the needs of many of the children are for the most part, unmet. We are concerned that chronic alcohol dependency can result in considerable time and attention being focused on consuming alcohol as opposed to parenting. This can mean that children are left unsupervised or that their basic needs for food, warmth and shelter may all be compromised. Children within such families may also
be at high risk of maltreatment, neglect or abuse. Whole population measures such as minimum pricing are therefore very welcome and indeed essential to the health and well being of Scottish people, particularly future generations. We believe it will have a protective effect on vulnerable populations whilst also reducing the overall level of alcohol problems.

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

Highland Council supports the principle of minimum pricing for alcohol but should be used in conjunction with other measures. We welcome the fact that the proposed legislation applies both to off-sales and on-sales premises which will help to counter the practice of drinking large amounts of alcohol at home before going out to licensed premises to continue drinking, which we find to be a common practice.

The level at which a proposed minimum price should be set

There is a risk that the increase in retail price which would result from a minimum price for alcohol would serve to encourage the introduction of an illegal market in alcohol or in counterfeiting because of the higher value of the goods. We note that senior police officers across all eight forces in Scotland have indicated that there is no evidence of an issue with illegal alcohol sales. To prevent an issue arising, we believe that the minimum price should be set at a level which would yield the greatest decrease in hazardous and harmful drinking whilst protecting against such adverse developments. Our view is that the ideal price would be 60p per unit, or 40p as a minimum.

According to the University of Sheffield’s research, a level of 40p would yield a reduction in consumption of 2.3% (5.1% in combination with the existing controls of discounting), whilst 60p would yield much higher benefits of 12.3% and 13.7% respectively. The cost impacts on hazardous and harmful drinkers of a 40p level would be £37 and £85 per year, whilst at 60p these rise to £96 and £162 which would be more likely to drive a change in behaviour. The value of health impacts over 10 years would be £236m for a 40p level and considerably higher at £1331m for 60p with similar ratios for crime and employment costs.

Other aspects of the Bill

In addition to the introduction of a minimum price, we would wish to see a continued emphasis placed on enforcement of existing legislation and on education at a whole-population level. We would also welcome measures to introduce separate access for alcohol in premises where other products are sold, to emphasise the fact that it is not just another commodity but one with very harmful consequences when misused. In our view, any additional revenue which results from the introduction of a minimum price should be used to fund measures to prevent alcohol misuse.
The proposed amendment to Schedule 3 to The Licensing (Scotland) Act 2005 forms the basis of determining the alcoholic strength of a drink supplied. We feel that some clarification is needed regarding how the quantity of any product will be determined. It may be that the quantity as declared on the bottle, can or the measure is to be used, but we feel this would benefit from being clarified in the legislation to avoid the possibility of troublesome legal arguments in any court case. These quantity declarations are in fact liable to variation, even within legally (Weights & Measures Law) permitted parameters, and from experience in relation to the sale of alcoholic drinks into open measures (e.g. pints of beer; measures of spirits) can also vary significantly outwith these parameters (e.g. Short measures).

Alcoholic drinks other than gin, rum, whisky, vodka, brandy, wine (other than fortified wine), beer and cider, or any cocktail including two or more of these drinks are not legally required to be sold by total volume or to contain any specified quantity of any constituent alcoholic or non-alcoholic drink. We feel that some consideration of the method for determining the price per unit of alcohol charged in these circumstances is needed. The sale of a single component drink in a glass could potentially be measured, but for evidential purposes this would suggest the involvement of a Trading Standards Officer. This would obviously not be possible after a mixer or ice has been added.

The Council welcomes the proposal that any additional costs involved in introducing and monitoring any new regime should not fall on Local Authorities. Any initial set up cost involving business advice to Licence Holders must be set at a realistic and meaningful level. If fees are to be increased to cover the additional workload of Licensing Standards Officers then such increases should not be “across the board” increases but be targeted at those premises which cause the increased workload. To do otherwise would be unfair on those premises which have not or should not require increased advice from LSOs.