Alcohol (Minimum Pricing) (Scotland) Bill

Edinburgh Alcohol and Drug Partnership

1. Introduction

1.1. For the purpose of this response Edinburgh Alcohol and Drug Partnership (EADP) will contain its comments to those aspects of alcohol policy which specifically relate to the Edinburgh Alcohol and Drug Strategy 2011-2014 and its three high level objectives:

- Children, young people and adults’ health and wellbeing is not damaged by alcohol and drugs.
- Individuals and communities affected by alcohol and drugs are safer.
- More people achieve a sustained recovery from problem alcohol and drug use.

1.2. EADP’s response to the three aspects of the consultation on the Alcohol (Minimum Pricing) (Scotland) Bill (the Bill) is detailed in paragraphs 2 – 4 below.

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

2.1. Research has shown that as the price of alcohol has decreased, there has been a resultant increase in consumption. There is also an abundance of evidence to suggest that the introduction of a minimum price per unit of alcohol will make alcohol less affordable which reduces consumption over the whole population and thereby reduces alcohol related harm.

2.2. EADP supports the Bill’s intention to introduce a pricing mechanism for the sale of alcohol based on a minimum price per unit and in particular to address the sale of alcohol in the off-trade as a loss leader and at one third of the cost of the average price per unit in the on-trade sector. It is imperative however, that a minimum pricing policy is only one element of a comprehensive alcohol strategy.

2.3. It is clear in the explanatory notes supporting the Bill, that minimum pricing targets those alcoholic drinks which are inexpensive in relation to their strength, such as white cider and cheap spirits; these drinks are more likely to be consumed by harmful than moderate drinkers. It is widely recognised that some homeless street drinkers and young people use white ciders as a fast way to get drunk.

3. Whist evidence suggests that even for these drinkers there would be an overall reduction in consumption with a minimum pricing regime, EADP is concerned of the risks to those individuals who will look to
alternatives such as denatured alcohol or alcohol-based hand sanitizers. In the event of enactment, EADP encourages the Scottish Government to be proactive in ensuring an intelligence framework to:

- rapidly identify changes in the alcohol taking behaviour of at risk populations and
- monitor whether or not changes in alcohol pricing has any impact on other trends in substance misuse.

3.1. More broadly, in relation to young people and alcohol, EADP would commend the Scottish Government to promote risk taking behaviour approaches and encourage targeted work with at-risk populations.

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

4.1. In line with research evidence, EADP endorses a minimum pricing system. It is clearly indicated in Table 6 of the explanatory notes to the Bill, that the greater the price, the larger the health and employment benefits and the greater the reduction in alcohol related crime.

4.2. EADP would not wish to comment on the exact level at which a minimum price was set. Nonetheless, having considered the available evidence, EADP notes the projected impact of benefits to health, employment and crime rates and the financial value of harm reduction over a ten year period are particularly marked at or above a price of 45 per unit.

5. Any other aspects to the Bill

5.1. It is noted that the increase in revenue from minimum pricing benefits the alcohol industry and is not directed into prevention or treatment aspects of alcohol policy.

5.2. EADP would draw the Committee’s attention to the findings of Hagger et al in their report “The Cost of Alcohol: A Minimum Price per Unit of Alcohol”\(^1\), which found that, as well as a range of government policies to address excessive alcohol consumption, when asked for how the introduction of a minimum price might be made more acceptable, respondents felt that revenue generated by higher alcohol prices should be used to fund other interventions.

5.3. Given the increased revenue benefits to the alcohol industry from a minimum pricing regime, EADP is hopeful that the deliberations of the Scottish Government Alcohol Industry Partnership means that some of these increased revenues can be used to support the roll-out

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\(^1\) Martin S. Hagger, Adam J. Lonsdale, Rob Baggott, Gillian Penny, & Matthew Bowen. (2009) The Cost of Alcohol: The Advocacy for a Minimum Price per Unit in the UK, Alcohol Research UK
of a range of interventions in support of culture change activities in relation to Scotland’s relationship with alcohol.

5.4. Furthermore, as identified in paragraph 2.3 above, white cider is closely identified with street drinkers because of its relatively cheapness and high ABV, yet taxation on cider is significantly lower than on other alcoholic drinks. Research by Alcohol Concern\(^2\) has shown that in a comparison of the difference between total tax paid and the cost to the customer, relatively high margins can be maintained for white cider sales. This situation will mean even higher profits for the manufacturers and retailers should minimum pricing be introduced. EADP would commend further discussion with the Westminster parliament to ensure change in taxation levels for white cider products, to ensure that additional monies can be channeled to support the wider arena of alcohol policy.

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\(^2\) Goodall Tony (2011) White cider and street drinkers, Alcohol Concern UK