Alcohol (Minimum Pricing) (Scotland) Bill
Scottish Association for Mental Health (SAMH)

1. SAMH

SAMH is a mental health charity which provides an independent voice on all matters of relevance to people with mental health and related problems and delivers direct support to 3000 people through over eighty services across Scotland. SAMH provides direct line-management to respect me (Scotland’s anti-bullying service) and ‘see me’ (Scotland’s anti-stigma campaign).

2. General Comments

SAMH responded to the previous consultation on ‘Changing Scotland's Relationship with Alcohol’ and the 'Alcohol Etc. (Scotland) Bill'. As a health promoting organisation, we support the introduction of minimum pricing for alcohol and urge politicians of all parties to back the Alcohol (Minimum Pricing) (Scotland) Bill.

However, we also wish to reiterate that minimum pricing should only be seen as part of a wider approach to tackling alcohol misuse. The regulatory measures proposed by this Bill could be very effective, but only if implemented as part of a broader approach which meaningfully addresses the underlying causes and consequences of alcohol misuse.

3. Specific Comments

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

SAMH has been providing specialist services to people with Alcohol Related Brain Damage (ARBD) for a number of years and has considerable expertise in this field. ARBD is a term used to describe the physical injury to the brain sustained as a result of excessive or long-term alcohol consumption. Alcohol can have a profound impact on individuals, families, and our society as a whole, yet few people acknowledge - or are even aware of - how much alcohol they consume and the links between alcohol and mental health.

The introduction of minimum pricing is clearly a divisive and highly emotive issue. We have considered our position on alcohol in light of the experiences of our staff and the people who use our services, as well as the available evidence from around the world pertaining to the correlation between price and alcohol consumption. SAMH believes that there is sufficiently compelling evidence to support the view that as alcohol becomes more affordable, consumption increases, and that as the price increases consumption goes down. Introducing minimum pricing for alcohol could therefore produce substantial social, economic and health benefits for Scotland.
SAMH supports the view that minimum pricing targets alcohol that is sold cheaply and that cheaper alcohol tends to be purchased more by harmful drinkers than moderate drinkers. Therefore, a minimum pricing policy could be seen as a targeted approach. Often the most damaging effects of alcohol are concentrated amongst our most deprived individuals and communities, where alcohol and drugs may be used to temporarily escape personal and social problems. It is also amongst these individuals and communities where mental health problems are to be found in the greatest severity and abundance.

A recent inquiry into suicide by people with mental Illness in Scotland uncovered strong links between alcohol and suicide, with more than half of the people who died by suicide identified by inquiry having a history of alcohol misuse.\(^1\) This finding is supported by other retrospective postmortem studies which have found that a substantial proportion (up to 56%) of people who completed suicide met the criteria for alcohol abuse or dependence.\(^2\)

We are clear that minimum pricing by itself will not resolve Scotland’s damaging relationship with alcohol. Some SAMH staff, working with people who would be considered harmful drinkers, have told us that minimum pricing may reduce overall consumption, but they believe it would be insufficient to reduce the alcohol intake of harmful drinkers to within guideline levels. However, any reduction from such high levels of consumption would be positive. It is also the case that minimum pricing may have little effect on the more moderate, but still at-risk drinkers. Regulatory responses to different alcohol products therefore require to be continually reviewed and measures should also target those products which are favored by harmful drinkers.

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

Transparent evidence should underpin all policy and practice aimed at addressing alcohol misuse in Scotland. SAMH would expect minimum pricing to be set at the level at which the greatest health benefits would be felt by greatest number of people, with particular consideration to patterns of alcohol consumption in Scotland.

- **Other aspects of the Bill**

The introduction of minimum pricing may result in overall increases in revenue from alcohol sales. As such, SAMH believes that a proportion of the resulting monies should be reinvested in alcohol related services and initiatives. There remains a need for investment to support significant improvements in both prevention and treatment services, as well as broader initiatives to transform Scotland’s relationship with alcohol.

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\(^1\) The University of Manchester: The National Confidential Inquiry into Suicide and Homicide by People with Mental Illness: Annual Report: England, Wales, and Scotland, 2011

4. Conclusion

There are strong links between poverty, deprivation, widening inequalities, suicide and problem alcohol use but the picture is complex. It may involve factors such as housing, mental health problems and poor employment opportunities, which are further compounded by a lack of resources.

As such, there can be no one response to alcohol. While regulatory measures will help to reduce alcohol related harm, they will do nothing to address the underlying causes of alcohol consumption unless taken as part of an overarching and comprehensive strategy. Changing Scotland’s relationship with alcohol will require the utilisation of all the mechanisms available to policy makers: controls on availability and marketing, improvements in services, and increased education and awareness.

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