Alcohol (Minimum Pricing) (Scotland) Bill

South Ayrshire Alcohol and Drug Partnership

1. Introduction

1.1 The South Ayrshire Alcohol and Drug Partnership (ADP) is grateful for the opportunity to comment on the above Bill.

We note that the main purpose of the Bill is to introduce a minimum price of alcohol below which alcohol must not be sold on licensed premises. The minimum price will be set according to strength of alcohol, the volume of the alcohol and the minimum price per unit.

We further note that responses have been invited on:

- the advantages and disadvantages of establishing a minimum alcohol sales price based on a unit of alcohol;
- the level at which such a proposed minimum price should be set and the justification for that level; and
- any other aspects of the Bill.

2. South Ayrshire Alcohol and Drug Partnership response

2.1 Alcohol Related Harm in Ayrshire

In Ayrshire and Arran, more than 150 people die each year directly as a result of alcohol such as through alcohol-related cirrhosis, with a similar number indirectly attributable. For example, 20% of breast cancer deaths are linked to alcohol. There are more than 4000 acute hospital discharges with a diagnosis directly attributable to alcohol, more than 1000 of which are in South Ayrshire.

There is clear evidence that health related harms and deaths occur up to seven times more frequently in people from the most deprived communities than in those from more affluent areas. In Ayrshire and Arran, our GPs have identified a five fold difference in the occurrence of alcohol abuse or alcohol dependence between the most and least affluent areas.

In South Ayrshire, drinking in public remains a high priority for Strathclyde Police and in 2008/09 accounted for 23% of all disorder crimes. Youth Disorder remains one of the most common complaints with undergraduate drinking and rowdy behaviour accounting for 62% of all cases reported.

The South Ayrshire ADP is aware that minimum pricing has not been tested widely, however, given this picture and scale of the problem we face, we are of the belief that any effort aimed at reducing consumption
across the population is worthy of consideration. We also recognise the international evidence that tackling price can help effectively address the problems associated with alcohol misuse as part of a wider package of measures. We are therefore supportive of the Bill.

The South Ayrshire Community Planning Partnership Board, at its meeting of 29 November 2011, gave its endorsement to the ADP’s position.

2.2 The Advantages and Disadvantages of Establishing a Minimum Alcohol Sales Price Based on a Unit of Alcohol

South Ayrshire ADP is in favour of establishing a minimum sales price for alcohol as an integral part of further measures effecting greater control on the availability and promotion of alcohol.

We are convinced that there is sufficient evidence to indicate that the consumption of alcohol is directly related to its price and that the societal costs of alcohol, in terms of the damage to health, social harm and criminal justice elements, have now reached such significant levels that more measures to control consumption are required.

Further, we are encouraged by emerging evidence from Canada which demonstrates a link between price and consumption in areas undertaking minimum pricing schemes. Preliminary findings from the evaluation carried out by Professor Tim Stockwell at the Centre for Addictions Research in British Columbia indicates that there was a reduction in consumption which was consistent with the price set in the two provinces included in the study (i.e. the greater the increase in price the greater the reduction in consumption).

In the absence of powers to control price through taxation - the conventional manner in which this is executed with income generated being retained within Government spending - controls through minimum pricing appear sensible. It is recognised that minimum pricing per unit will result in increased revenue for the retailer, which will offset any drop in sales and can be considered worthwhile for the greater societal benefit achieved through the overall reduction in consumption.

Price per unit is considered by South Ayrshire ADP to be the most appropriate mechanism through which this can be delivered since it relates the strength of an alcoholic beverage to the cost. We would also advocate that the price should be index linked to ensure that minimum pricing keeps up with inflation.

Evidence indicates that people drinking at harmful and dependent levels tend to purchase the alcohol that provides most units for least expenditure and therefore will benefit most from an increase in unit pricing. Minimum pricing is also likely to impact positively on young
people who also favour cheaper drinks. In addition, a reduction in the frequency of front or pre-loading is likely, since the younger drinkers who tend to indulge in this practice will not have the same price incentive to purchase from off sales premises and commence drinking at home or outdoors before concluding the drinking session intoxicated within an on-trade licensed premises. This evidence is also supported by Professor Stockwell’s findings.

2.3 The Level at Which Such a Proposed Minimum Price Should be Set and the Justification For That Level

The South Ayrshire ADP is of the view that there requires to be a significant increase in the price of the lowest cost per unit types of alcohol in order to have a significant impact on consumption and ultimately health and social outcomes.

Research indicates that the average price of alcohol is £1.31 per unit in bars, pubs, clubs, restaurants and hotels and 43p per unit in the off-trade. However, more concerning is that, in the off-trade, 59% of vodka is sold at less than 35p per unit and 26% of cider sold at less than 20p per unit.

The ADP recognises the work currently being undertaken by the University of Sheffield to update its modelling work on minimum pricing in line with 2010 Scottish Health Survey findings. However it is our view that, in order to achieve the greatest reduction in consumption, the cost per unit of off-sales alcohol requires to be brought as close to that of on-sales licensed premises as possible.

2.9 Any Other Aspects of the Bill

Efforts to raise awareness in relation to units and recommended limits have had little effect in reducing consumption or in keeping consumption levels within recommended limits. More radical action to reduce the amount of alcohol consumed by the whole population is required and the South Ayrshire ADP is supportive of the Scottish Government in its efforts to introduce minimum pricing is one potential way of achieving this.

There is a need, however to continue to see this Bill as a part of a wider set of measures to address alcohol harm.

Central to this is cultural change around drinking patterns, excessive consumption and associated behaviours (sexual activity, tobacco and illicit substance use, antisocial behaviour and crime). There is a need to reinforce a collective sense of responsibility for changing Scotland’s alcohol culture beyond the drinks industry and licence trade in order to change underlying cultural norms. The power of community involvement and activism in bringing about ownership and lasting change in our communities and the need to acknowledge, develop and
grow the skills, knowledge and assets of communities to take this forward requires to be a central element in the Scottish Government’s strategy and is an underpinning ethos of South Ayrshire’s Alcohol and Drugs Strategy.

In addition, evidence from the World Health Organisation (2003) also demonstrates that restricting availability of alcohol through age restrictions and reducing outlet density would also be effective measures and this requires to be a key priority.

There are also a number of opportunities that do not currently sit within The Scottish Parliament’s remit to legislate. These include the power of taxation of alcohol and the control of its advertising and promotion and, in particular, a reduction in indirect advertisement through the restriction and tighter control of alcohol product placement in the media. The South Ayrshire ADP would urge the Scottish Parliament to press the UK Government to act to address these areas where there is good evidence that raising taxes and applying mandatory restrictions on advertising reduces consumption of alcohol.

The Licensing (Scotland) Act 2005 has already enhanced the controls on alcohol in on-sales premises through amendments to promotions, tighter controls on licensing hours and mandatory server training. This was welcomed as evidence indicates that those with effective stewarding and server training in place will have fewer problems. Current powers are also available to Licensing Boards and Police in relation to known premises associated with frequent disturbances.

In principle, the ADP is supportive of the introduction of a Social Responsibility Levy provided for in the Alcohol etc (Scotland) Bill. However, as off-sales have not been constrained by legislation there is a risk that by placing too great an emphasis on the social responsibility of pubs and clubs this will result in them unfairly being held responsible for behaviour resulting from pre/front loading of alcohol purchased from off licence premises.

As part of a wider package of measures such as these, it is our view that action on minimum pricing will have a significant impact on reducing consumption and ultimately alcohol related harm in our communities.

Faye Murfet
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