Alcohol (Minimum Pricing) (Scotland) Bill

The International Coalition Against Prohibition (TICAP) welcomes the opportunity to make a written response to the Alcohol (Minimum Pricing) (Scotland) Bill as introduced into the Scottish Parliament by the Scottish Government on 31st October 2011.

It has to be made clear from the start that there is no International Evidence that shows that any form of minimum pricing will impact on the reduction of alcohol consumption. The single study carried out in Australia that recommended such legislation was never enacted and therefore no factual evidence can show that such measures are of any real value.

Any attempt to introduce Minimum Pricing is in actual fact a way to introduce further taxation measures on the products and consumers, such measures have been proven not to have the desired effect in reducing alcohol consumption. One need only look towards Scandinavia where alcohol had been excessively taxed, yet the prevalence of alcohol misuse remains visible.

The International Centre for Alcohol Policies has created a Briefing Paper to cover Taxation of Beverage Alcohol (1) and I urge this Committee to study the findings within the paper. It must also be highlighted that the Scottish Government’s own Director of Health Policies, Godfrey Robson (2) accepts that pricing does have a role to play, it is not a substantial part of the solution and his views are further developed within a paper entitled ‘If Alcohol Prices Increase, Will it Reduce Binge Drinking’ (3).

This organisation has also taken time to research the subject of ‘Binge Drinking’ (4) again I urge this Committee to read and understand their findings on the subject. where they go as far as offering policy options that can and should be considered by the Scottish Government. 

Let us look at the proposal of Minimum Pricing as presented by the Scottish Government and apply it to the brand that is singled out by many to be the biggest problem to drinking habits in Scotland namely Buckfast Tonic Wine (5). By applying the 40p per alcohol unit on this particular product it is found that the purchase price remains virtually the same, we must therefore assume that this legislation is not about health or pricing but about further control of the people without due consideration of the scientific facts.

In recent times much has been reported on the subject of alcohol misuse, at the same time certain facts have emerged that have not been reported and as a result Corrupted Alcohol Science (6) has emerged and is explained in detail by Dr John Luik Senior Fellow of The Democracy Institute, Washington DC & London.
Dr Luik and his colleague Dr Patrick Basham, founding director of the Democracy Institute and an adjunct scholar with Cato Institute’s Center for Representative Government. go even further when they debate the issues associated with Alcohol Advertising Bans (7), again I would urge everyone to read this document.

Accepting that Scotland has perceived issues with regard to Alcohol Consumption, there are many other ways to deal with the problem that would not impact on the sensible social drinker, the Drinks Manufacturer or Hospitality Sectors.

1. The Drinks Manufacturers, not Part Public Funded Pressure Groups, must take the lead role in presenting solutions to the perceived alcohol problems.

2. They can further develop educational programmes as initiated by the Portman Group / Drinkaware Campaign (8) thus presenting safe drinking messages within their global advertising.

3. The Drinks Manufacturers could be encouraged to set up a Charitable Foundation to help fund rehabilitation for those who desire help.

4. The International Centre for Alcohol Policies (9) (ICAP) must be invited to present real and meaningful long-term solutions as they are already advisors to the World Health Organisation.

ICAP published a book called Working Together to Reduce Harmful Drinking (10) is intended to contribute to the World Health Organization’s (WHO) global strategy to reduce the harmful use of alcohol. It explores areas where alcohol producers’ technical competence can and does make a positive contribution to reducing harmful drinking and where industry input has been welcomed by WHO. The book describes each of these areas: producing beer, wine, and spirits; addressing the availability of noncommercial beverages; pricing, marketing, and selling beverage alcohol; encouraging responsible choices; and working with others. The final chapter sets out views of how alcohol producers can contribute to reducing harmful drinking in countries where they are present.

The messages recurring throughout the book are that reasonable regulation provides the context for good alcohol policy, excessive regulation often leads to unintended negative consequences, leading producers have a proud record of making positive contributions to implementing effective alcohol policies—but there are opportunities to do much more.

The book is directed toward a broad readership and will be of interest to policy-makers involved in healthcare but also finance, agriculture, justice, tourism and culture; public health and social policy specialists; health advocates; and beverage alcohol industry members, including those in the supply chain from farming to advertising, hospitality sectors, and retail.
There is also a possible issue regarding the legal aspect of legislating on Minimum Pricing as precedence was set on the 24\textsuperscript{th} January 1978 as the result of a Legal Challenge \cite{11} in the Dutch Courts that ruled the setting of a Minimum Price to be illegal. TICAP expects that the Scottish Government will argue that such actions are taken on Health grounds; this must now be proven by the scientific method as recommended by the World Health Organization who stated in April 2011 that health professionals “to be independent and guided by scientific evidence.”

The Scottish Government Health Secretary claims that Minimum Pricing has been a success in Canada. TICAP raises concerns with regard to the strength of the evidence that the Health Secretary refers to and seek further scientific proof of the claim. We note that the Canadian delegation \cite{12} who gave evidence to the Health and Sports Committee on the 23\textsuperscript{rd} March 2010 concurred with that of the ICAP proposals that pricing was only a small part of the overall package to be considered.

The International Coalition Against Prohibition believes that where Lifestyle Choice is concerned it is the duty of Government to \textbf{Educate not Legislate}. We will now refer to a Dutch Study recently reported:

\textbf{Long-Term Effects of a Parent and Student Intervention on Alcohol Use in Adolescents}:\cite{13}

In this Dutch study, promoting parental rule setting and classroom alcohol education together nearly halved the proportion of adolescents who went on to drink heavily. Rarely have such strong and sustained drinking prevention impacts been recorded from these types of interventions.

TICAP also demands that the highest level of Scientific Integrity must be initiated within the legislative process and in partnership with global scientists has created

\textbf{The Brussels Declaration on Scientific Integrity} \cite{14} is a statement of ethical and scientific principles calling for the return to the Scientific Method as the guiding qualifier for the definition of a study as scientific. It demands the setting of exacting standards for the gathering of data in epidemiological studies, the mandatory specification of the margins of error in all studies, and the public and legal rejection of expert opinions based on studies and data where the margin of error is not or cannot be specified. It demands the restoration of the concept of threshold, and calls for the rejection by governments and regulatory bodies of any scientific work that does not meet those standards. It calls for the proscription of the use of unqualified studies as the basis for public policy, regulations, obligations and prohibitions and calls for the dismantling of policies, laws, bylaws and regulations that are based on such studies while causing upheaval in the economy, the destruction of our liberty, and impoverishment through excessive administration costs. It demands a return to an overall ethical approach to science, and to prudent public policy conservatism in the absence of
conclusive experimental proof; we therefore call upon all Cross-Party Politicians to endorse this important document of global significance.

TICAP also acknowledges the appointment of Prof. Anne Glover, Chief Scientific Advisor to the Scottish Government into a similar role within the European Union (15) and would expect her to uphold the principals of Scientific Integrity within the legislative process as an invitation has been extended to her to endorse the above document on behalf of the scientific community throughout all EU Member States.

Bill Gibson MLJ
Chairman
The International Coalition Against Prohibition
12 December 2011

References

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(2) Godfrey Robson
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(3) If Alcohol Prices Increase, Will it Reduce Binge Drinking
http://www.icap.org/LinkClick.aspx?fileticket=1frYkVgqw%3d&tabid=246

(4) Binge’ Drinking

(5) Buckfast Tonic Wine
http://en.wikipedia.org/wiki/Buckfast_Tonic_Wine

(6) Corrupted Alcohol Science
http://brusselsdeclaration.org/download/Luik_Alcohol.pdf

(7) Alcohol Advertising Bans

(8) Portman Group / Drinkaware Campaign
http://www.alcoholissues.co.uk/portman-group-drinkaware.html

(9) The International Centre for Alcohol Policies
http://www.icap.org/

(10) Working Together to Reduce Harmful Drinking
http://www.icap.org/Publications/WorkingTogether

(11) Ministère public du Kingdom of the Netherlands v Jacobus Philippus van Tiggele. 24th January 1978 Minimum prices of gin. - Case 82/77

(12) Canadian Evidence to the Health and Sports Committee
http://archive.scottish.parliament.uk/s3/committees/hs/or-10/he10-1002.htm#Col2991

(13) Long-Term Effects of a Parent and Student Intervention on Alcohol Use in Adolescents:

(14) The Brussels Declaration on Scientific Integrity
http://www.brusselsdeclaration.org

(15) Professor Anne Glover appointed Chief Scientific Adviser for Europe
http://www.scottishscience.org.uk/article/professor-anne-glover-appointed-chief-scientific-adviser-europe