West Lothian Licensing Forum (WLLF) welcomes moves to change Scotland’s relationship with alcohol and supports much of what is proposed in this Bill, with and understanding that the measures set out in the Bill are seen to be part of a wider approach to tackling alcohol misuse, as proposed in Changing Scotland’s Relationship with Alcohol: A Framework for Action. WLLF share the approach outlined in the Framework for Action, which states: ‘alcohol misuse is a complex issue involving a multitude of factors, including socio-economic, cultural, educations, community-based, health-related, or linked to individual behaviours and choices. This means there is no ‘miracle cure’ or ‘one size fits all’ solution.’ WLLF Believes that there is sufficient evidence to support the view that as alcohol becomes more affordable, consumption increases, and that as the price increases consumption goes down.

Alcohol related deaths account for 1 person every 3 hours in Scotland. 1 The scale of the problem requires radical action and strong leadership. The Alcohol (Scotland) Bill recognises that alcohol abuse requires to be tackled at a population level via a comprehensive package of measures that are targeted both at problem drinkers and at the wider population. Moderate drinkers effectively subsidise harmful and hazardous drinkers, the current policy of low alcohol prices means that responsible drinkers are subsidising the behaviour of the 25 % of the population drinking harmfully2.

Our views on the advantages and disadvantages of minimum pricing

Advantages
The WLLF acknowledges the evidence of the harmful effects of excessive alcohol consumption. The benefits of minimum pricing are wide ranging across different sectors of our society, these include heavy drinkers and their families, price sensitivity is most apparent here and if the drinker is drinking less, families and the drinker will both benefit. Many in the trade support minimum pricing, as cheap off trade alcohol is now recognised by many in the trade as their biggest threat.

The University of Aberdeen has shown that what is lost in volume of sales will be replaced by the increase in profits. Small retailers will be on a level playing field with supermarkets.

Minimum pricing may be seen as an insufficient measure if applied alone. It would have more of an impact as part of a package of other measures such as a properly constructed national education programme about the effects of alcohol on society with special emphasis on the dangers of irresponsible alcohol consumption. Implementing a minimum price may assist public

1 Alcohol Attributable Mortality and Morbidity-Alcohol Population Attributable Fractions for Scotland, ISD, 2009
2 Prof Anne Ludbrook (2008) Minimum Pricing of Alcohol – An Economic Perspective
services with the expected aim of reducing alcohol fuelled anti social behaviour and have a less detrimental impact on the NHS.

**Disadvantages**

As acknowledged by the Scottish Government the Sheffield Report predicts that all minimum price scenarios modelled result in increased revenue for the alcohol industry (off and on trade). The Competition Assessment suggests the possibility that retained profits are passed on to consumers through lower prices/higher quality on other products. However, this is not the only effect. Another possible outcome is that higher revenues increase the incentives for retailer to sell more alcohol. This is recognised in the recent House of Commons Health Select Committee.

Introducing a minimum price for alcohol may not persuade long-term problem drinkers or those who drink to get drunk to change their behaviour. The policy is designed to make everyone drink less, moderate and problem drinkers alike. The cheapest drinks tend to be favoured not only by those who drink excessively but also by those with less disposable income.

We note, however, that in peer reviewing the University of Sheffield study, CEBR disputed the reliability of the price elasticities employed and therefore the validity of Sheffield's findings, in their research the University of Sheffield authors assume a steady state, estimating the possible impact of minimum pricing without consideration of other key factors, they do not, for example take account of the potential increase in illegal imports, a likely consequence of any market distortion through the introduction of minimum unit price.

Our views on the level at which such a proposed minimum price should be set and the justification for that level

WLLF would expect minimum pricing to be set at the level at which the greatest health benefits would be felt by greatest number of people. This level should be set and subsequently varied by the Scottish Ministers subject to the control of the Scottish Parliament.

Minimum pricing may go some way in reducing Scotland’s overall levels of alcohol consumption. However, redefining the cultural norm in Scotland will require a whole population approach which supports and encourages more responsible drinking, as well as increasing awareness and understanding, in order to empower and enable individuals to make more positive choices.

The University of Sheffield research in 2008 indicates that setting a price of 50p per unit would result in a significant reduction of alcohol related harms whilst ensuring that alcohol remains affordable for moderate drinkers. Alcohol

3 Competition Assessment paragraphs 30 and 32
4 First Report of Sessions, 2009 on Alcohol (HC151-1)
http://www.publications.parliament.uk/P9/CM200910/CMSELECT/CMHEALTH/151/151i.PDF
consumption would be reduced across all population groups with the most significant reduction in harmful drinkers (10.3%). Concurrent with the obvious health benefit to the people of Scotland would be a significant reduction of alcohol fuelled crime and disorder with a consequential improvement in the safety of our communities. The 50p price per unit is also in line with the recommendations of the Chief Medical Officer, Sir Liam Donaldson made in his Annual Report on the State of the Nations Health 2008 and supported by Professor Ian Gilmore, Chairman of the Royal College of Physicians.

The recent research quoted above, also examined the ‘Effect on Consumption and Harm’ of a 50p per unit cost. This study showed that a minimum price of 50p would reduce consumption on average by 6.9%. Consumption in the 11-18 year old groups would drop by 7.3%. 18-24 hazardous drinkers would be reduce consumption by 3%, harmful drinkers by 10.3% and moderate drinkers by 3.5%. This study demonstrated what has been advocated by Members of the Medical Profession and students in Alcohol Policy and Public Health for many years, that alcohol price directly affects consumption across all types of drinking.

Other aspects of the Bill

The Scottish Government has stated that the estimates decrease in alcohol sales would be more than offset by unit price increase, leading to overall increases in revenue from alcohol sales. While WLLF appreciates this rationale, the benefits of minimum pricing would be maximised if a proportion of the resulting monies were reinvested in alcohol related services and initiatives.

Scottish Parliament could lobby Westminster to increase taxation on selected products, e.g. cider, where the duty paid per litre is 26p compared to 65p for a similar volume and strength of beer, Westminster could reduce the levy on lower strength beer and increase it on higher strength brews to encourage the alcohol industry to shift production from higher to lower strength beers. This would give drinkers an incentive to drink lower strength alcohol, which could reduce alcohol related harm. This approach has been tried in Australia, where 40% of the beer market now has an alcohol content of less than 3.8%, and alcohol consumption has decreased by 24% since 1980.

West Lothian Licensing Forum

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7 Stockwell T, Working with the Alcohol Industry on Alcohol Policy – should we sometimes sit at the same table ?, Addition, 102, pp 1-3