

Cyflwynwyd yr ymateb i ymgynghoriad y [Pwyllgor Iechyd a Gofal Cymdeithasol](#) ar [Isafbris Uned am Alcohol yng Nghymru](#)

This response was submitted to the [Health and Social Care Committee](#) consultation on [Minimum unit pricing for alcohol in Wales](#)

**MUP14 : Ymateb gan: Cymdeithas Llywodraeth Leol Cymru | Response from: Welsh Local Government Association**

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## Health and Social Care Committee Written Inquiry: Minimum unit pricing for alcohol in Wales

### Introduction

To inform the Health and Social Care Committee's written inquiry on the operation and effectiveness of Minimum Unit Price (MUP) for Alcohol.

This response provides a written response to the matters listed as being of interest and within the scope of the Health and Social Care Committee Inquiry.

We welcome the opportunity to provide written evidence to the Committee in regard to such an important topic, which reaches beyond the health and social care arena.

### Introduction to the WLGA

**Welsh Local Government Association:** We are the Welsh Local Government Association (WLGA); a politically led cross-party organisation that seeks to give local government a strong voice at a national level. We represent the interests of local government and promote local democracy in Wales.

The 22 councils in Wales are our members and the three fire and rescue authorities and three national park authorities are associate members.

We believe that the ideas that change people's lives, happen locally.

Communities are at their best when they feel connected to their council through local democracy. By championing, facilitating, and achieving these connections, we can build a vibrant local democracy that allows communities to thrive.

**Our ultimate goal** is to promote, protect, support and develop democratic local government and the interests of councils in Wales.

### We'll achieve our vision by

- Promoting the role and prominence of councillors and council leaders
- Ensuring maximum local discretion in legislation or statutory guidance
- Championing and securing long-term and sustainable funding for councils
- Promoting sector-led improvement
- Encouraging a vibrant local democracy, promoting greater diversity
- Supporting councils to effectively manage their workforce.



## WLGA response

### Public understanding of MUP

- 1. *Minimum unit pricing is a targeted health improvement measure which aims to reduce alcohol consumption among people drinking at harmful levels. How effectively has the purpose of the legislation been communicated to the general public and to businesses affected?***

The launch of the Minimum unit pricing was shared effectively when the Public Health (Minimum Price for Alcohol) (Wales) Act 2018 was passed, but the implementation on 2 March 2020 was potentially overshadowed by the impending Covid-19 pandemic, with the first UK lockdown occurring three weeks later.

The purpose of reducing problematic alcohol consumption and the harmful impact of cheap, high alcohol content drinks was widely publicised through the media and local substance abuse services, however with the impacts of the pandemic and more importantly the cost of living crisis the messaging is either not as strong or is no longer relevant to many people. The wider implications of the cost of living crisis on individual and family finances, increased levels of poverty and the housing and homelessness crisis all of which add to stress and pressure that people are under may have overtaken the narrative.

### Impact of MUP

- 2. *What impact has minimum unit pricing had on alcohol-related harm in Wales?***

The WLGA notes that independent research has been carried out and reports published that focus on retailers, drinkers and those who provide and use specialist services.

- 3. *What impact has the introduction of minimum pricing had on particular groups, including:***

- a. *vulnerable and dependent drinkers***  
Please see the evidence in the reports.

There may have been early results for vulnerable and dependent drinkers, but the evidence from a council perspective was overshadowed by the covid-19 pandemic and the actions and responses needed. The pandemic didn't just impact on people's ability to move around as easily as before but also impacted on local community groups and services which were prepared to react to a potential increase in demand and instead had to plan to change within the guidelines. The reduced choice of movement meant that alongside shortages of essentials being reported, there were also reports by news outlets of [increases in alcohol sales](#).

The effectiveness of MUP has not particularly been observed within councils, but this may be due to other challenges taking focus and attention, and the housing and cost-of-living crisis making it difficult to identify specific impacts, as we deliver holistically for individuals, families and communities across Wales.



## **b. children and young people**

We refer to our previous reference to the independent reports where there is limited information regarding children and young people. In preparation for implementation there were concerns expressed about the possible negative impact of MUP for children if families prioritised spending on alcohol over other bills. The evidence within the reports “*suggest these perceived concerns are unsubstantiated*”. This is supported by research for the Scottish Government following their implementation of a MUP.

There may already be a culture shift within children and young people away from just alcohol, with cocktails of alcohol and drugs being one potential outlet. A few instances linked to the possible addiction and behaviour to high energy caffeine drinks have been seen in schools and youth services, and the increase in vapes and vaping is a growing issue and concern with little legislation to support those trying to alleviate the issues.

Children are increasingly raising concerns and showing anxiety around finances and housing, which has been highlighted by the Children’s Commissioner for Wales in her [Spotlight report: How housing and homelessness affects children and young people in Wales](#). This is exacerbated for young carers with 56% stating that the cost-of-living is either always or usually affecting them and their family according to the Carers Trust in 2023 in their [Being a Young Carer is Not a Choice](#) report.

It is difficult to provide any clarity on the impact on children and young people specifically related to MUP when we are aware of the increases in mental health issues linked to the pandemic. Increased anxiety, concern around housing and homelessness, the additional challenges faced by young carers, and the increased number of children living in poverty to name but a few. All of which contending against the backdrop of a cost of living crisis impacting on everyday costs and adding to children, young people and their families concerns. We suggest that there needs to be a more holistic view taken, bringing all of the variable factors that impact on a child together and delivering person-centred support that is responsive to any Adverse Childhood Experiences (ACEs).

## **c. low income households**

The independent reports suggest that the MPU has had an impact on low income households and the choices they make.

Councils continue to work with individuals, families and communities to provide the best opportunities for income optimisation and to reduce costs. However, for those in poverty, the impact of the cost of living crisis and any housing and homelessness issues may exacerbate financial choices that are being made. It is therefore not possible for councils to provide additional evidence that any change in behaviour is linked specifically to the policy around MUP at this time.



**4. What impact has the introduction of minimum pricing in Wales had on retailers and local authorities:**

***i) retailers***

No comment.

***ii) local authorities***

The implementation and monitoring of MUP is delivered by councils through Trading Standards teams to ensure compliance. Officers report that the new regulatory burden has not impacted significantly on their daily functions. However, officers have been required to understand and interpret the new legislation sufficiently, in order to inspect and advise businesses and premises owners to ensure compliance.

Enforcement has been minimal, with just a few complaints received, and only one penalty notice issued. Officers have reported that the MUP calculator provided has been very helpful, which in turn reduces inspection time.

It is difficult to identify what impact MUP has had on other council services such as housing, community cohesion, community safety and social care due to the timing of the implementation. Council services were adjusted to deliver the needs of local communities in response to the pandemic, and then to respond to the cost of living and housing crisis.

**Future of MUP in Wales**

**5. Should minimum unit pricing continue in Wales? Why?**

Yes, we agree that the MUP should continue as part of a wider programme of healthy lifestyle promotion by Public Health Wales. The Cabinet Secretary for Health and Social Care stated at the Bevan Summit on the 26 March that he wants Wales to be the first Marmot Nation, continuing with MUP can be seen as part of supporting delivery.

The Health and Social Care committee have recently been receiving evidence on their inquiry into the *prevention of ill-health – obesity* part of which has included a focus on planning and the provision of cheap fast food in areas close to schools and in areas of poverty. Before the pandemic one of the approaches taken by Cardiff University to try to reduce excessive drinking by female students was to provide posters that showed the equivalent calorie intake from alcohol to a range of fast foods. Whilst it may not be the main focus for limiting alcohol intake levels, the calories can often be overlooked.

**6. Should the current minimum unit price of 50p be reviewed? Why?**

The level should be reviewed because with the cost of living prices are increasing on all products and therefore may not be having the same effect at the current level as it did in 2020. We would suggest that it may be appropriate to put in place a process for it to be automatically reviewed on a regular basis, possibly every other year, so it can be adjusted for inflation and other factors which may raise prices of alternatives above the MUP.



In Scotland, the MUP was increased to 65p per unit in September 2024, increasing it from 50p. There may be an opportunity for Wales to utilise the research and evidence used in Scotland to expedite the decision making process on any increase in Wales.

**7. *Minimum unit pricing is intended as one of a range of policy approaches to tackling alcohol-related harm. Do any other approaches need to be considered/strengthened in order to reduce alcohol-related harm in Wales?***

Alcohol-related harm does not occur or have impacts in isolation and can be the trigger or the response. For example, alcohol may lead to domestic abuse where the perpetrator's behaviour deteriorates with alcohol, but for the victim the domestic abuse may lead to alcohol consumption as part of their coping mechanisms. Similarly, people with mental health issues may drink alcohol to help manage or forget how they are feeling, but excessive alcohol may lead to behaviour and mood swings that declines the mental health of that individual.

It is important that we do not think of alcohol-related harm and services and support in isolation but as part of a holistic approach, that is person-centred and is built on a social model foundation. This allows not only the medical approach to be delivered but also any possible causes to be managed and alternative solutions sought in the future.

[Research into Adverse Childhood Experiences](#) (ACEs) has identified if children are subjected to four or more ACEs they are four times more likely to be a high-risk drinker as an adult. By responding to ACEs earlier with children and with young adults, this number can be reduced to the same or similar as those with less than four ACEs. Prevention and early intervention are important not just for harmful drinking but for a range of other life outcomes which will benefit individuals, families and communities.

**8. *What impact has minimum unit pricing had on the need for alcohol treatment and support services?***

There continues to be a need for alcohol treatment and support services across Wales. Given the other environmental issues already mentioned in this response it is difficult to identify the impact of MUP on alcohol treatment and support services in isolation. Combined however, it has potentially led to an increase in demand for not only alcohol and other substance misuse services. but has likely increased the complexity for other related services such as mental health and domestic abuse support and services.

**9. *What impact has minimum unit pricing had on the risk of substituting alcohol for more dangerous and illegal substances?***

The range of issues and possible impacts vary with the different trends. The increased consumption of a cocktail of alcohol and different illegal drugs being combined were identified before the MUP was introduced in 2020. And we do not feel this behaviour has subsided.

There remains a risk for 'moonshine' and more home brewing or alcohol making. However, some of the increase in people making their own alcohol at home was due to wanting a hobby during the pandemic restrictions which may have continued with the cost of living



crisis. Providing the making of alcohol is for their own consumption doing so is outside of regulations and is likely to vary in alcoholic strength.

There is increasing concern about the changing landscape of synthetic opioids such as Nitazines is also an emerging threat that needs to be taken into consideration. For example, we are aware that professionals working to identify the state of the drugs market recognise the change to cheap to produce bulk synthetic tablets as being readily available on the unregulated black market.

There is an increase of shoplifting across Wales, with alcohol being one of the items that has been targeted. It is difficult to know if this is linked to the MUP, cost of living crisis, poverty levels or in some instances part of organised crime. Whilst partaking in criminal activity such as theft is not the same as taking substances, it can be addictive and provide an adrenaline rush and 'high' of its own.