

MPA 30

Bil Iechyd y Cyhoedd (Isafbris am Alcohol) (Cymru)

Public Health (Minimum Price for Alcohol) (Wales) Bill

Ymateb gan Alcohol Focus Scotland

Response from Alcohol Focus Scotland



ALCOHOL FOCUS SCOTLAND RESPONSE TO HEALTH, SOCIAL CARE AND SPORT COMMITTEE'S CONSULTATION ON THE PUBLIC HEALTH (MINIMUM PRICE FOR ALCOHOL) (WALES) BILL

Alcohol Focus Scotland (AFS) is Scotland's national charity working to prevent and reduce alcohol harm. We aim to reduce the impact of alcohol in Scotland - and beyond - through the implementation of effective alcohol control policies and legislation. We have been at the forefront of the campaign to introduce minimum unit pricing in Scotland for the last decade.

1.1 AFS welcomes the opportunity to respond to this consultation. Our comments in relation to the general principles of the Bill, barriers to implementation and any unintended consequences of the Bill are below.

2. The general principles of the Bill and the extent to which it will contribute to improving and protecting the health and well-being of the population of Wales.

2.1 AFS welcomes and supports this legislation. We have long advocated supported minimum unit pricing for alcohol.

2.2 The international evidence is clear that low alcohol prices drive consumption and harm. The World Health Organization, therefore, recommends minimum unit pricing (MUP) as an intervention to prevent and reduce non-communicable diseases.¹ As a highly effective and cost-effective measure, MUP it will significantly improve and protect the health and well-being of the people of Wales.

¹ World Health Organization, "' Best Buys' And Other Recommended Interventions for the Prevention and Control of Noncommunicable Diseases", May 2017. Available at: http://who.int/ncds/management/WHO_Appendix_BestBuys.pdf

2.3 Introducing this measure at this time is especially important, given the recent announcement from the Welsh government that alcohol deaths in Wales increased by 9% in 2016 compared with 2015.²

2.4 Committee members will be aware of the work Sheffield University has done on behalf of the Welsh government to estimate the impact of minimum unit pricing in Wales on population health. This work is referenced in the Explanatory Memorandum for the bill. To summarise some of the Sheffield team's key findings, once the full effects of the policy are in place, MUP in Wales is estimated to lead to:

- 53 fewer deaths a year
- 1,400 fewer hospital admissions a year
- £131 million a year saved in healthcare costs
- £882 million in savings to society overall each year

2.5 Reductions in drinking will predominantly occur amongst high-risk drinkers, with moderate drinkers barely noticing the difference. According to Sheffield University's analysis, under a 50p MUP moderate drinkers will spend just £2.37 a year more on alcohol, and consume just 6.4 fewer units a year.³

2.6 It should also be recognised that alcohol harm affects not only the drinker but their families and communities, through family breakdown, neglect and violent crime. Reductions in alcohol consumption as a result of MUP will, therefore, improve the lives of many thousands of people in Wales.

3. Any potential barriers to the implementation of the provisions and whether the Bill takes account of them

3.1 The Welsh government will need to ensure that local authorities are adequately trained and supported to carry out enforcement work in relation to this legislation.

4. Whether there are any unintended consequences arising from the Bill

4.1 One consequence of MUP, though not necessarily an unintended one, is that more people may seek help from substance misuse services. An increase in demand could place existing services under further pressure, and it is crucial that treatment services are adequately funded to meet this demand.

4.2 A number of negative consequences of the Bill have been suggested, and we summarise these below, and give our response to each.

² Welsh government (14 November 2017), 'Increase in alcohol-related deaths in Wales – new report shows'. Available at <http://gov.wales/newsroom/health-and-social-services/2017/item/?lang=en>

³ Sheffield University (2014), Model-based appraisal of minimum unit pricing for alcohol in Wales. Available at <http://gov.wales/docs/caecd/research/2014/141208-model-based-appraisal-minimum-unit-price-alcohol-en.pdf>

4.3 A common criticism of MUP is that it is a 'tax on the poor', and that it will place financial pressure on lower income groups who, like most people, enjoy having a drink, and who are already struggling financially.

4.4 The reality is that those in lower income groups suffer the greatest harms from alcohol consumption. **In Wales the proportion of all patients admitted for alcohol specific conditions who lived in the 10 per cent of most deprived areas was nearly 4 times higher than those from the least deprived areas.**⁴ Conversely, this means people in the most deprived areas have the most to gain from minimum unit pricing in terms of health benefits.

4.5 **All moderate drinkers, including those in poverty, are estimated to barely change their spending in response to MUP.** Sheffield University's modelling estimates that moderate drinkers who are not in poverty will spend an average of £2.44 more per year under a 50p MUP.⁵

4.6 In contrast, **moderate drinkers who are in poverty will see a smaller rise in their spending,** at an average of £2.15 per year under a 50p.⁶

4.7 High-risk drinkers (making up 5.7% of the Wales population) are estimated to spend an average of £32 more per year under a 50p MUP⁷, and this increase in spending is likely to be felt more by those on low incomes. However, these high-risk drinkers (who are consuming over 71 units of alcohol per week) would decrease their alcohol consumption by 13%, bringing numerous health benefits. We believe that, on balance, these health gains should outweigh other concerns.

4.8 Furthermore, we would highlight that since Sheffield University's modelling work for the Welsh government in 2014, research has suggested that in England, a 50p MUP would mean that **harmful drinkers in poverty will actually spend £88 less per year.**⁸ This is because harmful drinkers are predicted to drastically cut their drinking in response to MUP. We see no reason why this analysis would not apply to Wales.

4.9 Concern has been expressed that MUP could lead to increases in dependent drinkers committing crime in order to consume alcohol, or that dependent drinkers may choose to consume harmful alcohol substitutes such as methylated spirits in order to get drunk.

⁴ Public Health Wales and the Welsh Government, "Data mining Wales: The annual profile for substance misuse 2016-17", October 2017. Available at:

<http://gov.wales/docs/dhss/publications/171025data-miningen.pdf>

⁵ Ibid.

⁶ Ibid.

⁷ Ibid.

⁸ Meier, P. et al (2016), Estimated Effects of Different Alcohol Taxation and Price Policies on Health Inequalities: A Mathematical Modelling Study, *PLOS Medicine*. doi: <http://dx.doi.org/10.1371/journal.pmed.1001963>

4.10 However, a study of dependent drinkers' behaviour following an increase in the price of alcohol found that these effects were very uncommon.⁹ A review of the negative impacts of MUP has concluded that, 'unintended negative consequences from MUP are minor in comparison with the substantial health, social and economic benefits the policy creates.'¹⁰

4.11 Another concern is that MUP may lead to increased profits for some alcohol producers and retailers in the off-trade, due to the increased prices of the cheapest products. Increased profits could then be spent on activity (e.g. alcohol marketing) which are linked with alcohol harm. We believe that, on balance, the large benefits of MUP in terms of people's health significantly outweigh this potential consequence.

4.12 Finally, concern has been expressed that MUP would negatively affect pubs. However, assuming the MUP is set at 50p, pub prices will be left unchanged. For example, with a 50p MUP, a pint of average strength beer could not be sold for less than around £1, but this is well below the cost of average beer prices.

4.13 MUP could actually be good for pubs, as it will increase the price of cheap supermarket alcohol which has been able to undercut pub prices, and lead to more people deciding to drink at home. In addition, research done by the Institute of Alcohol Studies found that pub managers support minimum unit pricing by a margin of 2 to 1.¹¹

⁹ Falkner, C. et al (2016), The effect of alcohol price on dependent drinkers' alcohol consumption, *New Zealand Medical Journal* 128: 1427, pp9-17.

¹⁰ Stockwell, T. & Thomas, G. (2013), Is alcohol too cheap in the UK? The case for setting a Minimum Unit price for alcohol. London: Institute of Alcohol Studies.

¹¹ Institute of Alcohol Studies (2017), Pubs Quizzed: What Publicans Think About Policy, Public Health and the Changing Trade. Available at:
<http://www.ias.org.uk/uploads/pdf/IAS%20reports/rp26092017.pdf>