I am writing to you in your capacity as Convener of the Health and Sport Committee on behalf of the British Hospitality Association to express our concerns about the Alcohol etc (Scotland) Bill, which includes proposals for the introduction of a minimum pricing per unit of alcohol.

The British Hospitality Association (BHA) represents more than 3000 establishments in Scotland alone and has been representing the hotel, restaurant and catering industry for over 100 years. We represent all sections of the industry – individually owned hotels, restaurants and catering operations as well as group-owned properties, clubs and motorway service areas. As a sector, we are one of Scotland’s largest employers.

The sector is concerned that further regulations at this stage, particularly without consultation or understanding of the implications, could have a negative impact on the hospitality sector in Scotland. Rural hotels and restaurants in particular often act as the local licensed premises and many of our hotels across Scotland operate bars within them. We are therefore concerned that proposals for minimum pricing could have an adverse affect on their sales. Moreover, the changes to the promotion and sale of alcohol will affect an industry which has already suffered from significant changes to licensing arrangements over the past six months.

The BHA has further concerns about the bill’s provisions for the further regulation of glass sizes. As we represent some of Scotland’s premier hotels and restaurants, you will understand why many of our members believe that some of these regulations should not apply in their establishments. Many of the clients to these establishments appreciate the ambiance and knowledge of alcoholic drinks offered by staff and we feel that the imposition of further regulations on glass sizes would have a negative effect and distract from the appreciation of the drinks on offer and their consumption.

Sections 10 and 11 of the bill introduce the ability for Minister’s to introduce a social responsibility levy to cover the costs of dealing with alcohol related problems. The BHA has concerns about this section and how it could be imposed on our members. As we have stated, most of our members are hotels and restaurants and are not a contributing factor to alcohol related problems in Scottish communities and therefore believe that a social responsibility clause should not apply to the sector.

Whilst we recognise the need to address irresponsible alcohol consumption, we believe that minimum pricing, should be given further consideration as it could
affect jobs, particularly in rural areas. Our members are concerned that once minimum pricing is introduced, successive governments could raise the minimum level to higher levels and thus further reduce the profitability of the sector.

The BHA would be grateful if these issues could be considered by the Health and Sport Committee.

Debbie Taylor
Chairman
BHA Scotland Committee
20 January 2010