Fife has chosen to submit one partnership response to the Scottish Parliament’s Health and Sport Committee call for written evidence on the general principles of the Alcohol etc. (Scotland) Bill.

Fife Health and Wellbeing Alliance is the community planning partnership with strategic responsibility for improving health and wellbeing in Fife and is accountable to Fife’s community planning partnership - the Fife Partnership. (Lead partner agencies on the Fife Partnership are Fife Council, NHS Fife, Fife Constabulary, Scottish Enterprise, Skills Development Scotland, Fife’s further & higher education sector, CVS Fife, the Scottish Government and SEStran (South East of Scotland Transport Partnership)

Following consultation within key community planning organisations, the Fife Health and Wellbeing Alliance offers these views on the Alcohol etc (Scotland) Bill on behalf of the Fife Partnership.

Supporting evidence for many of the views formed has already been highlighted in the explanatory notes and other documents published to accompany the Bill and there is no need to replicate these further at this stage.

The advantages and disadvantages of establishing a minimum alcohol sales price based on a unit price of alcohol

The advantage of unit minimum pricing is that it is evidence based, relatively simple to apply and ensures that the price is passed on to customers.

The level at which a minimum price should be set

On health grounds it is felt that a minimum unit price needs to be at least 40 pence to have a significant impact: lower minimum prices tend to cause switching from one type of drink to another, with little effect on overall consumption. There is also support within the area of licensing standards for a higher level of 50 pence a unit in order to have an even greater impact.

The rationale behind the use of minimum pricing as an effective tool to address all types of problem drinking

The rationale is the price elasticity of alcohol: as alcohol becomes pricier, consumption falls. The model based appraisal of alcohol minimum pricing indicates that a total ban on off-trade discounting combined with a 40p minimum unit price would reduce consumption by an estimated 5.4%.

Under minimum pricing and discount removal all drinkers would spend more because percentage fall in consumption is less than percentage price
increase. These policies would disproportionately affect those buying the most alcohol: a 40p minimum price combined with an off-trade discount ban moderate, hazardous and harmful drinkers would spend an average of £0.21, £1.12 and £2.63 more per week respectively.

Minimum pricing and discount removal are thus effective in reducing population consumption and resulting harm, especially for hazardous or harmful drinkers. It is also likely to affect consumption disproportionately in people on lower incomes and would thus help to address alcohol-related health inequalities (table 1).

### Table 1: Directly Standardized Mortality Rate per 100,000 of Alcohol-related Premature Deaths for Fife residents aged 15-74 years for the Least and Most Deprived Quintiles, April 2002- March 2009

<table>
<thead>
<tr>
<th></th>
<th>5-Year Composite Financial Year of Death Registration</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>2002-7</td>
</tr>
<tr>
<td></td>
<td>No.</td>
</tr>
<tr>
<td><strong>NHS Fife 20% Least</strong></td>
<td></td>
</tr>
<tr>
<td>Deprived</td>
<td>Alcohol</td>
</tr>
<tr>
<td></td>
<td>Alcoholic Liver Disease</td>
</tr>
<tr>
<td><strong>NHS Fife 20% Most</strong></td>
<td></td>
</tr>
<tr>
<td>Deprived</td>
<td>Alcohol</td>
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<tr>
<td></td>
<td>Alcoholic Liver Disease</td>
</tr>
</tbody>
</table>

Source: Registrar General Scotland

**Possible alternatives to the introduction of a minimum alcohol sales price as an effective means of addressing the public health issues surrounding levels of alcohol consumption in Scotland.**

Price restriction is the most effective means of controlling consumption at a population level. Other methods, for example education and awareness, are far less effective in influencing behaviour. However minimum pricing needs to be implemented in conjunction with other measures, for example controlling the current extent of alcohol advertising and promotion aimed at young people which we know influences their perceptions, encourages alcohol consumption and increases the likelihood of heavy drinking.

Taxation as a means of controlling price is unlikely to have the same effect on alcohol availability and consumption. Despite alcohol taxation going up by 6% in 2008, supermarkets continued to sell heavily discounted alcohol by not passing on the tax increase to customers. The advantage of minimum pricing is that this option is not available to retailers.
**The advantages and disadvantages of introducing a social responsibility levy on pubs and clubs in Scotland**

Disagreement with the principle underpinning these specific recommendations was expressed in the response from NHS Fife representatives to the 2008 Scottish Government alcohol discussion document (this doesn’t apply to tobacco, take away foods or other retail products so why should it apply to alcohol). NHS Fife representatives retain that view. Apart from this disagreement in principle it should also be highlighted that there are currently powers in place to control and improve management of such premises and these should be used. The use of a levy is not likely to change the behaviour of premises managers or their patrons and would simply add an administrative burden on local authorities.

Although this is a partnership response it should be noted that Fife Constabulary do not share the above view on this point and are supportive of the ethos of a social responsibility fee. The difficulties of introducing such a levy are recognised and the complexity of both principles and issues should not be underestimated.

**The justification for empowering licensing boards to raise the legal alcohol purchase age in their area to 21**

Evidence suggests that raising the minimum legal drinking age reduces alcohol sales and problems among young drinkers, and because off-sales are a relatively uncontrolled means of buying particularly cheap drink the recommendation in the 2008 Scottish Government alcohol discussion document to raise the minimum legal age of purchase for off-sales to 21 was supported. This recommendation was removed following the consultation exercise and replaced with the weaker alternative for local discretionary powers. Strong support from the health perspective is offered for the current proposals on the grounds that they would be better than the status quo.

The police and licensing standards view in Fife also originally supported raising the legal alcohol purchase age to 21 years. The positive effects of running a short term ‘Under 21 Alcohol Ban’ initiative in Cupar, Fife have been recognised but the current police view is that they are not persuaded that this approach would have the desired long term effects. There is an underlying feeling that this proposal risks demonising and alienating law abiding 18 – 21 year olds and is formed from an existing cultural standpoint. The police view however is that support for this section should still be continued in order to allow Licensing Boards to impose a condition on a licence as a punitive measure against errant licence holders. Licensing standards feel that the outcome is no different whether the legal age is set by Licensing Boards or by the Government.

NB. The views of Fife Licensing Board have not been included in this partnership response due to the quasi-judicial nature of its function and the...
need for it to remain independent from the views and positions taken by other organisations and bodies.

It should be noted that there is full support for the requirement for licence holders to operate an age verification policy.

**The role of promotional offers and promotional material in encouraging people to purchase more alcohol than they intended**

Support is offered for these measures. Competition has driven down drinks prices through extended promotions, ‘buy-one-get-one-free’ offers and below-cost selling. This is prevalent in the off-trade, though big pub chains also offer high volume cheap selling. Supermarkets sell alcoholic drinks below cost as a loss-leader: in some supermarkets it’s possible to buy certain brands of cider for under 20 pence per unit. These practices encourage additional or impulse buying.

A total ban on off-trade discounting would reduce consumption by an estimated 3%: a total ban combined with a 40p minimum unit price would reduce consumption by an estimated 5.4%. This illustrates the benefit of combining different approaches and tools in the box to make an impact as evidenced in the Sheffield study.

There is strong agreement that there is a need to introduce restrictions on advertising and promotional material connected with the sale and supply of alcohol for both ‘on’ and ‘off’ sales.

**Any other aspects of this Bill**

*Premises licences: variation of conditions.* Licensing Standards feel this power would benefit Licensing Board’s, particularly when trends and problems have been identified which could be solved by establishing a licensing condition on target premises. The opportunity to take swift action with a minimum of administrative burden on local authorities is helpful and therefore supported.

Professor James McGoldrick  
Chair  
Fife Health and Wellbeing Alliance  
20 January 2010