The International Coalition Against Prohibition (TICAP) welcomes the opportunity to make a written response to the Alcohol Etc. (Scotland) Bill (SP Bill 34) as introduced on the 25th November 2009.

**Minimum Pricing**

It has to be made clear from the start that there is no International Evidence that shows that any form of minimum pricing will impact on the reduction of alcohol consumption. The single study carried out in Australia that recommended such legislation was never enacted and therefore no factual evidence can show that such measures are of any real value.

Any attempt to introduce Minimum Pricing is in actual fact a way to introduce further taxation measures on the products and consumers, such measures have been proven not to have the desired effect in reducing alcohol consumption. One need only look towards Scandinavia where alcohol had been excessively taxed, yet the prevalence of alcohol misuse remains visible.

The International Centre for Alcohol Policies has created a Briefing Paper to cover Taxation of Beverage Alcohol (1) and I urge this Committee to study the findings within the paper. It must also be highlighted that the Scottish Government’s own Director of Health Policies, Godfrey Robson (2) accepts that pricing does have a role to play, it is not a substantial part of the solution and his views are further developed within a paper entitled ‘If Alcohol Prices Increase, Will it Reduce Binge Drinking’ (3).

This organisation has also taken time to research the subject of ‘Binge’ Drinking (4) again I urge this Committee to read and understand their findings on the subject. where they go as far as offering policy options that can and should be considered by the Scottish Government.

Let us look at the proposal of Minimum Pricing as presented by the Scottish Government and apply it to the brand that is singled out by many to be the biggest problem to drinking habits in Scotland namely Buckfast Tonic Wine (5). By applying the 40p per alcohol unit on this particular product it is found that the purchase price remains virtually the same, we must therefore assume that this legislation is not about health or pricing but about further control of the people without due consideration of the scientific facts.

In recent times much has been reported on the subject of alcohol misuse, at the same time certain facts have emerged that have not been reported and as a result Corrupted Alcohol Science (6) has emerged and is explained in detail by Dr John Luik Senior Fellow of The Democracy Institute, Washington DC & London.
Dr Luik and his colleague Dr Patrick Basham, founding director of the Democracy Institute and an adjunct scholar with Cato Institute’s Center for Representative Government, go even further when they debate the issues associated with Alcohol Advertising Bans (7), again I would urge everyone to read this document.

Accepting that Scotland has perceived issues with regard to Alcohol Consumption, there are many other ways to deal with the problem that would not impact on the sensible social drinker, the Drinks Manufacturer or Hospitality Sectors.

1. The Drinks Manufacturers must take the lead role in presenting solutions to the perceived alcohol problems.

2. They can further develop educational programmes as initiated by the Portman Group / Drinkaware Campaign (8) thus presenting safe drinking messages within their global advertising.

3. The Drinks Manufacturers could be encouraged to set up a Charitable Foundation to help fund rehabilitation for those who desire help.

4. The International Centre for Alcohol Policies (9) (ICAP) must be invited to present real and meaningful long-term solutions as they are already advising the World Health Organisation.

ICAP recently published a book called Working Together to Reduce Harmful Drinking (10) is intended to contribute to the World Health Organization’s (WHO) global strategy to reduce the harmful use of alcohol. It explores areas where alcohol producers’ technical competence can and does make a positive contribution to reducing harmful drinking and where industry input has been welcomed by WHO. The book describes each of these areas: producing beer, wine, and spirits; addressing availability of noncommercial beverages; pricing, marketing, and selling beverage alcohol; encouraging responsible choices; and working with others. The final chapter sets out views of how alcohol producers can contribute to reducing harmful drinking in countries where they are present.

The messages recurring throughout the book are that reasonable regulation provides the context for good alcohol policy, excessive regulation often leads to unintended negative consequences, leading producers have a proud record of making positive contributions to implementing effective alcohol policies—but there are opportunities to do much more.

The book is directed toward a broad readership and will be of interest to policy-makers involved in healthcare but also finance, agriculture, justice, tourism and culture; public health and social policy specialists; health advocates; and beverage alcohol industry members, including those in the supply chain from farming to advertising, hospitality sectors, and retail.
The International Coalition Against Prohibition believes that where Lifestyle Choice is concerned it is the duty of Government to **Educate not Legislate** and that the highest level of Scientific Integrity must be maintained within the legislative process.

**The Brussels Declaration on Scientific Integrity**\(^{(11)}\) is a statement of ethical and scientific principles calling for the return to the Scientific Method as the guiding qualifier for the definition of a study as scientific. It demands the setting of exacting standards for the gathering of data in epidemiological studies, the mandatory specification of the margins of error in all studies, and the public and legal rejection of expert opinions based on studies and data where the margin of error is not or cannot be specified. It demands the restoration of the concept of threshold, and calls for the rejection by governments and regulatory bodies of any scientific work that does not meet those standards. It calls for the proscription of the use of unqualified studies as the basis for public policy, regulations, obligations and prohibitions and calls for the dismantling of policies, laws, bylaws and regulations that are based on such studies while causing upheaval in the economy, the destruction of our liberty, and impoverishment through excessive administration costs. It demands a return to an overall ethical approach to science, and to prudent public policy conservatism in the absence of conclusive experimental proof; we therefore call upon all Cross-Party Politicians to endorse this important document of global significance.

Bill Gibson  
Director  
TICAP  
17 January 2010

Organisation Member of the Human Rights and Civil Liberties Cross-Party Group (Scottish Parliament)

[http://www.antiprohibition.org](http://www.antiprohibition.org)
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(3) If Alcohol Prices Increase, Will it Reduce Binge Drinking
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(4) Binge’ Drinking

(5) Buckfast Tonic Wine
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(6) Corrupted Alcohol Science
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