The Area Clinical Forum welcomes the opportunity to comment on the above Bill and would wish to comment as follows:

**Alcohol related health harm in Ayrshire and Arran**

In Ayrshire and Arran more than 150 deaths each year are directly attributable to alcohol (e.g. alcohol-related cirrhosis) with a similar number indirectly attributable (e.g. 20% of breast cancer deaths). Many partners and children suffer from the secondary effects of alcohol use through physical or psychological distress and damage. There are more than 4000 acute hospital discharges with a diagnosis directly attributable to alcohol.

These are heavy burdens for our society and our services to bear. We are also aware that the least affluent sections of the population are also the most likely to suffer from the adverse health effects of alcohol with a gradient of up to six times higher mortality and morbidity in the most deprived areas across Scotland. Our GPs have identified a five fold difference in the occurrence of alcohol abuse or alcohol dependence between the most and least affluent areas in Ayrshire and Arran.

The Area Clinical Forum believes that the alcohol consumption of the total population has risen to levels where widespread harm is being caused. Such alcohol related harm must be tackled using a package of measures with abolition of discounting and minimum pricing forming part of that package.

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

From a health perspective, the Ayrshire & Arran Area Clinical Forum does not see any disadvantages to establishing a minimum price based on a unit of alcohol. However, it would wish that such establishment be considered as part of a package of further measures effecting greater control on the availability and promotion of alcohol.

It further considers that increasing price is likely to have an impact on the practice of front- or pre-loading – purchasing alcohol from off-sales premises and consuming this at home or outdoors prior to attending on-trade licensed premises. Abolition of the price incentive to do so should also reduce the excessive drinking of young people, a large number of whom report drinking in this manner. The Forum would hope that such measures would also have an impact on alcohol fuelled violence in our town centres.

In the absence of powers to control price through taxation - the conventional manner in which this is executed with income generated being retained within Government spending - controls through minimum pricing appears sensible. It is recognised that minimum pricing per unit will result in increased revenue for
the retailer, which will offset any drop in sales and can be considered worthwhile for the greater societal benefit achieved through the overall reduction in consumption.

Price per unit is considered the most appropriate mechanism through which this can be delivered since it relates the strength of an alcoholic beverage to the cost. Evidence indicates that people drinking at harmful and dependent levels tend to purchase the alcohol that provides most units for least expenditure.

**The level at which such a proposed minimum price should be set and the justification for that level**

The Area Clinical Forum has no specific view on the level of a minimum price but considers it should be set so that there are significant increases in the prices of the lowest cost per unit types of alcohol. Any price which brings the purchasing cost of off-sales alcohol close to that of on-sales licensed premises is considered appropriate.

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

The Scottish Alcohol Needs Assessment indicated that one in four adults in the Ayrshire & Arran, Lanarkshire and Dumfries & Galloway area report drinking alcohol at levels known to be harmful to health and that one in 15 may be dependent on alcohol. Sales data indicate these as underestimates of consumption, with more than 60% of this alcohol being purchased from off-licensed premises. Simple actions like awareness raising in relation to units and recommended limits have been taking place for years and do not seem to have been effective. More radical action to reduce the amount of alcohol consumed by the whole population is required and an approach of minimum pricing is one potential way to do this.

**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**

The Area Clinical Forum considers that minimum pricing should form part of a package of measures. The efforts to change the cultures around drinking patterns, excessive consumption and associated behaviours (sexual activity, tobacco and illicit substance use, antisocial behaviour and crime) should be maintained, alongside additional measures such as minimum pricing and discounting bans for off-sales. Measures restricting availability of alcohol and reducing outlet density would also be welcomed as would increasing the taxation of alcohol and mandatory curbs on advertising and indirect promotions of alcohol.

**The advantages and disadvantages of introducing a social responsibility levy on pubs and clubs in Scotland**

The Area Clinical Forum does not wish to comment on this section.
The justification for empowering licensing boards to raise the legal alcohol purchase age in their area to 21

The Area Clinical Forum recognises that the majority of young people legally able to purchase alcohol do so responsibly, and that young people have a range of adult responsibilities at different ages. However, clinical staff see around 700 attendances of young people aged under 20 years at Ayrshire and Arran Accident and Emergency Departments each year with an alcohol-related presentation, approximately half of these being aged 17 to 19 years. A significant number of these require admission to a hospital ward for clinical care and the rate of alcohol-related discharges in Ayrshire & Arran for young people aged less than 21 years is higher than the Scottish average. The Area Clinical Forum would therefore support extra efforts to restrict sales to this group.

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

Promotional offers such as those that provide increased quantities for standard unit price (such as two for the price of one) appear designed to encourage people to purchase more than they would usually, be that for immediate or future consumption. In a highly competitive market, it is not realistic to expect retailers to reduce voluntarily their promotion of products aimed at increasing footfall into stores and therefore legislation may be required. Evidence indicates that abolishing such offers through banning discounting will contribute to a reduction in alcohol consumption.

Any other aspects of the Bill

The Area Clinical Forum would wish tighter controls over the advertising of alcohol products, more in line with the controls in place for tobacco. Alcohol is not an essential food group and should be treated as a drug rather than as a food commodity. The Forum would also wish to encourage action to control better the sales of ‘fortified’ alcoholic beverages in which caffeine is used as a stimulant alongside the depressant effects of alcohol. Such a combination, which seems particularly problematic with younger drinkers, is already relatively costly and is unlikely to be captured by minimum pricing.

In summary, the NHS Ayrshire & Arran Area Clinical Forum supports the general principles of the proposed Bill. It is of the view that the appropriate use of alcohol is everybody’s responsibility. However, it is concerned with the need to ensure non-stigmatisation of people with harmful or dependent use.

Stuart Hislop
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20 January 2010