Alcohol etc. (Scotland) Bill

NHS Greater Glasgow and Clyde

Excess alcohol consumption has a profound effect on the population of NHS Greater Glasgow and Clyde (NHSGGC). In 2007 the standardised alcohol related mortality rate in NHSGGC was 56 per 100,000 population compared to 35 per 100,000 population in Scotland for the same period.\(^1\) The Office of National Statistics data indicate that the NHSGGC health board area has the top four local authority areas in the UK in the ranking of deaths from alcohol for males (Glasgow, Inverclyde, West Dunbartonshire and Renfrewshire) and two of the four top areas for in the ranking of deaths from alcohol for women for the period 1998-2004.

NHS Greater Glasgow and Clyde welcomes the opportunity to respond to the important proposals outlined in the Alcohol Etc. (Scotland) Bill.

We consider each of the consultation questions.

1. **Advantages and disadvantages of establishing a minimum price**

   From a health perspective there are no disadvantages in setting a minimum price per unit of alcohol. Tackling price and availability are the most effective alcohol policies aimed at reducing consumption. Alcohol consumption is profoundly influenced by price. In the UK between 1980 and 2007 alcohol has become 69% more affordable and alcohol consumption has increased as the price of alcohol relative to income has declined\(^2\). This is illustrated in figure 1.

   ![Figure 1. Price of Alcohol and Consumption](image)

Alcohol consumption has been shown to be causally related to over 60 different medical conditions, causing morbidity and premature mortality. In the majority of cases there is a dose response relationship, the risk increasing with the amount of alcohol consumed. As alcohol has become more affordable, consumption increased by 2 litres of pure alcohol per annum from 1980 to 2007 and alcohol related death increased by more than 100%. In fact,

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1 ISD Scotland Alcohol statistics 2009
2 (www.shaap.org.uk) (Ludbrook A. Minimum Pricing of Alcohol-An Economic Perspective)
trends in alcohol related deaths are almost an exact copy of the trends in increased alcohol consumption, as shown in figures 2 and 3.

Figure 2: Alcohol Consumption  
Figure 3: Alcohol Related Deaths in Scotland

A minimum price per unit of alcohol sold would reduce the alcohol consumption and reduce alcohol related harm and will actually protect people who are most susceptible to alcohol related harm who are most likely to buy the cheapest alcohol.

2. The level at which such a proposed minimum price should be set and the justification for that level
We strongly support the principle of minimum pricing, set at a level that would have the highest impact on reducing consumption and therefore minimising harm. Research produced by the team at Sheffield University which modelled the effect of different levels of minimum pricing on alcohol consumption in Scotland indicates increasing impact on consumption with increases in price. 40 pence per unit has a very small effect on consumption (-2.7 per cent), while at 50 pence and 60 pence, there is significant changes in consumption (-7.2 per cent and 12.9 per cent respectively). The higher the price, the lower the consumption, and the lower the harm caused by drinking. 3

3. Rationale behind the use of minimum pricing as an effective tool to address all types of problem drinking
Increasing the price of alcohol has a higher effect on particular types of drinkers: young drinkers and heavy drinkers are especially responsive to price as are those living in conditions of socioeconomic deprivation.

Children and young people:
The low price of alcohol is contributing to alcohol related harm in our young people. School surveys conducted in Glasgow City, Renfrewshire and West Dunbartonshire have revealed that the proportion of secondary school age children who drink alcohol regularly in these areas are 53%, 60%, and 64% respectively, and of those who drink regularly 27% in Glasgow and, 22% are

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in Renfrewshire are drunk at least once a week and in West Dunbartonshire 23% are drunk at least once or twice a month.\textsuperscript{4} Regular drinkers in Glasgow schools reported that 33.5% spend at least £5 a week on alcohol, 13% spend £11 a week or more and 3.1% spend more than £20 a week.\textsuperscript{5} £5 will buy over 16 units of alcohol if the unit price is 30p a unit. There is also a potential approach that the minimum price per unit might be at a higher level for products particularly targeted at young people, including “alco pop” style drinks,

**Binge Drinkers**

In NHS GGC 65% of males and 51% of females binge drink. Binge drinking is particularly common among younger adults (75% of males and 61% of females under 45 years binge drink).\textsuperscript{6} In recent years, younger adults have increasingly tended to consume alcohol at home prior to going out and cheap alcohol sold in supermarkets and other off-sales premises are fuelling this practice.

**People living in circumstances of relative deprivation**

In NHSGGC thirty two percent of the local drinkers exceeded the weekly recommended limits, ranging from 37% in men to 25% in women. There was little difference in the proportion exceeding weekly limits between residents living in the 15% most deprived areas compared to those living in the more affluent areas for both males and females. Despite the relatively similar levels of excess alcohol consumption, illness and death associated with excess alcohol consumption is experienced disproportionately by our most deprived communities. This is illustrated by examination of the occurrence on Wernicke Korsakoff Syndrome, a form of alcohol related brain damage which causes memory impairment and can render the individual incapable of independent living. Figure 4 illustrates that this condition is far more common in our most deprived communities.

![Figure 4](image)

\textsuperscript{4} An Unequal Struggle for Health DPH report 2009
\textsuperscript{5} Health and Wellbeing of S1 to S4 pupils in New Learning Community Schools in Glasgow City, May 2008
4. Possible alternatives to the introduction of minimum price of alcohol

We believe that there is no effective alternative to minimum pricing within the powers of the Scottish Government. Other measures, such as tax increases, ban on discounts, prevention of sales at below tax and duty, stricter enforcement of licensing legislation would be insufficient to achieve meaningful reductions in alcohol consumption.

**Tax Increases** are unlikely to be effective as currently vendors are prepared to absorb the additional tax to entice shoppers into the store.

**Discount Ban and the Role of Promotional Offers:** a total ban on discounts would have only a small impact on total alcohol consumption (estimated to result in a 3% decrease in overall consumption).

5. The advantages and disadvantages of introducing a social responsibility levy on pubs and clubs in Scotland;

We support the principle of introducing a social responsibility levy. The problem with is measure is the possible difficulty in enforcing them. However should they come into force we must make sure that the money generated is used to reduce anti-social behaviour.

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

We support the proposals that local licensing boards can raise the age to 21 - it could allow targeting of areas with know problems of underage sales and could also allow some comparisons. It could also be an important symbolic action to show the harm alcohol can do although the problem with underage drinking as one of easy availability, lack of adult supervision, and cheap prices.

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

Promotional offers and promotional material explicitly encourage a culture of purchasing and in turn drinking more than a person originally intended. However, when combined with minimum pricing it would have an additional impact on people’s consumption estimated to result in a further 3% decrease in overall consumption.\(^7\)

8. Any other aspects of the Bill

No other comments.

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