Alcohol etc. (Scotland) Bill

NHS Highland

NHS Highland welcomes the opportunity to respond to the consultation on the Alcohol Bill.

Alcohol related harm
Like elsewhere in the country alcohol causes significant detriment to the people of the Highlands each and every year through unnecessary preventable illness, death and social harm.

The 2008 Scottish Health Survey reports that in Highland over 27% drink over the weekly recommended guidelines for alcohol consumption among adults.

Deaths from alcohol related causes have increased significantly in Highland over the last 20 years.

In all hospital care settings in NHS Highland over 5 percent of total bed days can be attributed to a diagnosis that is directly related to alcohol. There has been a 13 percent increase in alcohol related standardised discharge rates from acute and general hospitals involving NHS Highland residents between 2001-02 and 2007-08. In 2007-08 there were 3,061 NHS Highland patients discharged from an acute or general hospital with diagnoses directly related to alcohol. The discharge rate of 919 per 100,000 is higher than in Scotland and has been consistently higher for several years.

Measures to tackle the problem of harmful drinking are therefore welcome and indeed essential to the well being of the Scottish people.

General comments
We welcome moves to begin a process to link price to strength of alcohol (units). The Scottish whisky industry has argued for a direct link between tax, price and strength to protect its export markets overseas. The introduction of minimum pricing here would begin such a link at home as an example to other countries.

We were encouraged by the recent supportive comments on minimum pricing by the English health committee.

Some years ago NHS Highland stopped the use of alcohol at any of its official meetings, receptions etc. This denormalisation of the availability of alcohol should be further considered for Scottish Civic life especially within the public sector. For example, the use of alcohol at lunch time meetings during a normal working day and the use of alcohol as free gifts, or prizes, at civic receptions.

Efforts to incentivise low alcohol drinks by low pricing should be maximised so that less harmful alternatives are easier and cheaper to obtain.

Responses to the consultation questions
We now consider each of the consultation questions in turn:
The advantages and disadvantages of establishing a minimum alcohol sales price based on a unit of alcohol;
From a public health perspective, there are no disadvantages of setting a minimum price on alcohol. Alcohol consumption in the UK has doubled over the last 40 years. The average consumption of alcohol in a population is directly linked to the amount of harm. Consumption is strongly linked to affordability. As price has fallen, consumption has risen. Alcohol is now 69% more affordable than thirty years ago. Tackling price and availability are the most effective alcohol policies. A minimum price per unit of alcohol sold would have a significant impact on alcohol consumption and reduce harm. Establishing a minimum price puts in place a process and embeds a principle that can be used to tailor future policy and price levels.

The price gap between on and off sales has also widened dramatically over the years with deep discounting, bulk purchase deals and below cost selling common place. The introduction of a minimum unit price will address this. In reducing access to cheap high strength alcohol, we reduce health harm for the individual, with a knock on effect for communities, society and the economy.

The current trends in Scotland are to drink more at home and to ‘pre-load’ (the practice of drinking large amounts of alcohol at home before going out to licensed premises to continue drinking), it is therefore necessary to apply this principle regarding minimum pricing equally across off and on-sales.

Many of the opponents to minimum pricing argue that it would not differentiate between cheaper brand alcohol more likely to be consumed in larger quantities by harmful drinkers and the more expensive drinks more likely to be consumed by moderate drinkers. However, research done in late 2009 looking at supermarket pricing of a vast array of alcoholic products showed that a minimum price of 40p would lead to little or no change on the price of most spirits and wine but would lead to a rise in the cost of strong ciders and beers. A few examples are given in the table at the end.

The level at which such a proposed minimum price should be set and the justification for that level;
We recommend that the minimum price per unit should be at least 40p. We believe that this would have a significant impact on reducing alcohol related harm in Highland not only for the individual but for the families, communities and wider society. We accept pragmatically that a 40p initial minimum price would be a major step forward but we note that increasing price to 50p or 60p would also have a significant impact on the affordability of the current ‘cheap / strong’ alcohol choices for young people, ensuring long term health benefits. This upper limit would result in a 12.9% reduction in consumption with the majority of the behaviour change seen in harmful drinkers. A change in the affordability will have a positive knock on effect on those who don’t consider themselves to be drinking to excess.
This thinking is echoed by the comprehensive research produced by the team at Sheffield University which modelled the effect of different levels of minimum pricing on alcohol consumption in Scotland. 40 pence per unit has a beneficial effect on consumption (-2.7 per cent), while at 50 pence and 60 pence, there are further significant changes in consumption (-7.2 per cent and 12.9 per cent respectively).

The researchers demonstrated that with this reduced consumption, there were also reductions in hospital admissions, alcohol related crimes, work absenteeism and chronic disease resulting from alcohol. The message is clear: the higher the price, the lower the consumption, and the lower the harm caused by drinking.

**The rationale behind the use of minimum pricing as an effective tool to address all types of problem drinking:**
We are supportive of other continuing efforts to reduce alcohol consumption. Minimum pricing can be most effective when implemented with a series of other measures. The other measures include bans on promotions and changes to the overall marketing of alcohol, improved screening and brief intervention programmes, improved access to treatment and support services, as well as health promotion and education. However, just as with smoking, the main health benefits will be achieved through effective legislation and fiscal measures. Minimum pricing would have an effect on alcohol consumption, where other measures have failed.

**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:**
While other measures will contribute there is no effective alternative to minimum pricing. It is true to say that an increase in pricing may be achieved through increased taxation so we would be supportive of such measures as well. This would also allow additional revenue to be used for the support and treatment of problems caused through alcohol misuse. It is likely that this measure would mainly impact on those who drink heavily. However, the rate of alcohol duty is set by the UK Treasury, and so outwith the scope of this bill.

**The advantages and disadvantages of introducing a social responsibility levy on pubs and clubs in Scotland:**
The general application of such a fee, without reference to the effect on monitoring and policing of licensed premises, is likely to alienate those licensees who are operating their premises responsibly and without any adverse affects. The levying of the fee must be on a targeted basis and aimed at those premises whose serving of alcohol practice results in increased activity for enforcement services. The criteria for becoming eligible for additional fees must be based on the record of the premises concerned, together with the impact of the sale and supply of alcohol on community safety.

Off-sales also have a social responsibility when engaged in selling potentially harmful products, heavily discounted and bulk purchase promotions could be
seen as a failure to acknowledge their responsibility to their customers in terms of their health.

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

Consideration needs to be given to the overall impact of imposing such restrictions, particularly in areas where access to alternative off-sales may be close by. We agree in principle that off-sales provision of alcohol to young adults requires greater attention to insure that responsible alcohol consumption messages are instilled in the next generation of adult consumers.

There is little evidence to suggest that raising the alcohol purchase age to 21 would encourage a more responsible or less harmful drinking culture. Many states in the USA have a “21” policy, but teenagers aged 12 to 20 years drink 11% of all alcohol consumed in the US, and more than 90% of this alcohol is consumed in the form of binge drinks. This is a similar pattern to Scotland and the other home nations’ problems with teenage drinking. More research is needed to model the effects of raising the drinking age to 21 on public health, but some useful recommendations were made recently by the English Chief Medical Officer Sir Liam Donaldson who pinpointed the problem of underage drinking as one of easy availability, lack of adult supervision, and cheap prices: “Alcohol consumption, including heavy and regular drinking, is positively associated with the amount of spending money young people have available to them.”

In other words, minimum pricing controls would positively impact upon underage drinking. Promotional offers that encourage the consumption of spirits at so-called “pocket money” pricing provide the ingredients for teenage binge drinking.

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

Promotional offers such as “buy one get one free” or “three for the price of two” or £10 for all you can drink explicitly encourage a culture of bulk purchasing and in turn drinking more than a person originally intended. An end to bulk purchase alcohol deals would encourage a more moderate and responsible drinking culture. The Sheffield study reports that combined with minimum pricing this would have a further additional impact on people’s consumption (-2.1 per cent at 40 pence, -1.4. per cent at 60 pence).

There is a need to ensure this measure applies to all supermarkets as well as smaller off-licenses. Treating the display of alcohol in the same way as cigarettes and pharmaceutical products would impact positive change in buyer mind set.

Garry Coutts
Chair
NHS Highland
19 January 2010
<table>
<thead>
<tr>
<th>Product</th>
<th>Lowest Price (Excluding Offers)</th>
<th>Alcoholic Units</th>
<th>Floor price at minimum price of 40p per unit</th>
<th>Change</th>
</tr>
</thead>
<tbody>
<tr>
<td>The Famous Grouse 700ml</td>
<td>£12.00</td>
<td>28</td>
<td>£11.20</td>
<td><strong>No change</strong> (already £0.80 above)</td>
</tr>
<tr>
<td>Glenmorangie Single Malt 10 y/o 700ml</td>
<td>£28.49</td>
<td>28</td>
<td>£11.20</td>
<td><strong>No change</strong> (already £17.29 above)</td>
</tr>
<tr>
<td>Gordon's Special Dry London Gin 700ml</td>
<td>£12.49</td>
<td>26.25</td>
<td>£10.50</td>
<td><strong>No change</strong> (already £1.99 above)</td>
</tr>
<tr>
<td>Guinness Draught 10x440ml 4.1% vol</td>
<td>£10.04</td>
<td>18.04</td>
<td>£7.22</td>
<td><strong>No change</strong> (already £2.82 above)</td>
</tr>
<tr>
<td>Jacob's Creek Sauvignon Blanc 12.5% vol</td>
<td>£5.48</td>
<td>9.375</td>
<td>£3.75</td>
<td><strong>No change</strong> (already £1.73 above)</td>
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<tr>
<td>Diamond White 2 litre (7.5% vol)</td>
<td>£3.07</td>
<td>15</td>
<td>£6.00</td>
<td><strong>+£2.93 (95.4%)</strong></td>
</tr>
<tr>
<td>Own Brand Strong Dry Cider 3 litre 5.5% vol</td>
<td>£2.78</td>
<td>16.5</td>
<td>£6.60</td>
<td><strong>+£3.82 (137.4%)</strong></td>
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<tr>
<td>Value Lager 4x440ml 3% vol</td>
<td>91p</td>
<td>5.28</td>
<td>£2.11</td>
<td><strong>+£1.20 (131.9%)</strong></td>
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Prices at 28th October 2009 [www.mysupermarket.co.uk](http://www.mysupermarket.co.uk)