I have numbered the specific points on the call for evidence from 1 to 7 and commented briefly on each. My main area of research interest is in relation to point 5 (the ‘levy’). For brevity I have limited referencing to my own relevant work.

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

Advantages:

i. The resultant drop in consumption by those who currently consume very cheap alcohol is likely to reduce the burden on the health service (e.g. reduce mortality).

ii. Though less clear cut the measure is also likely to reduce some all too common types of alcohol-related violence in Scotland (e.g. in domestic settings).

iii. The measure may save jobs / businesses in the ‘drinks and hospitality’ industry (e.g. the ‘on-trade’ sector and smaller local ‘off-sales’), which are currently under-threat from the major super-markets’ practice of deep-discounting alcohol products.

Disadvantages:

i. This could become the thin end of a ‘backdoor prohibition’ wedge.

ii. Extra financial burden placed on problem drinker’s families etc.

iii. Semantics – ‘Fair pricing’ would have been a better term for this measure, one which its opponents would find more difficult to build moral arguments against (without changing the actual substance / efficacy of the policy itself).

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

The minimum price could be set (initially) at the level of current ‘on-trade’ prices, with the objective of encouraging more ‘on’ rather than ‘off-trade’ consumption.

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

This is a public health measure. Such measures work by affecting a very large number of people, even if only in a small way. Under what is known as the ‘preventative paradox’ ordinary social drinkers (because of their greater numbers in society) cause more problems and incur greater costs (e.g. to the
NHS) than the much smaller number of identified ‘problem drinkers’ or known offenders.

4. 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

Realistic alternatives may not be politically viable, such as teaching Young People how to drink in moderation by including rather than excluding them from ‘on-trade’ premises (point 6.). If a safer alternative to alcohol exits, then it is already illegal.

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

Disadvantages

It is not possible to attribute harm to individual sectors (i.e. the ‘on’ or ‘off-trade’) let alone individual premises. I have tried to do this in various research projects looking at disorder associated with pubs, nightclubs and off-licenses, and in every case the movement of consumers throughout a single drinking session made this task impossible. These studies implications for this proposal are summarised below.

In the ‘pub study’ (Forsyth et al, 2005) it was clear that some drinkers moved between premises as the evening wore on (i.e. ‘pub crawls’), others had clearly been drinking before they entered observed premises (suggesting ‘pre-loading’) and many pub-goers subsequently moved on to nightclubs after ‘closing time’.

At the time, nightclub operators in Scotland claimed that they were being unfairly blamed for the consequences of pub ‘happy hour’ drinkers, who would turn up at their venues intoxicated, and be (correctly) refused entry by the door stewards, resulting in a police incident leaving a ‘black-mark’ against their premise’s name. For these reasons I decided to investigate the late night (club) sector in my next project.

In the ‘nightclub study’ (Forsyth, 2006) more evidence of the above was observed, but for confirmation, this research purposively investigated practices relating to the concept of ‘pre-loading’ by interviewing patrons. From these interviews it was clear that ‘pre-loading’ (also known as ‘front-loading’) was the norm before nightclub attendance. The only people who did not drink before entering nightclubs appeared to be either non-Scots or employees in the Night-Time Economy themselves (e.g. pub staff, transport etc.). ‘Front-loading’ was found to involve both ‘off-trade’ and ‘on-trade’ alcohol. It could take place at home (some interviewees saw this as the most enjoyable part of the night) or in alfresco settings (some drank en route to licensed premises). It could also take place in pubs, sometimes in multiple venues and from multiple sources throughout the evening. Usually (but not always) this was done in advance of other alcohol being consumed inside the destination nightclub.
However, rather than being merely driven by cheaper prices from the ‘off-trade’ sector, it was apparent that consumers behaviour was governed by the structure (length of duration) of the Night-Time Economy (Forsyth, 2009). Put simply if the ‘on-trade’ closed at 11PM there would be less ‘front-loading’ but more ‘back-loading’ (late-night drinking at private ‘after-parties) from the ‘off-trade’.

Nevertheless, the ‘off-trade’ was the source of most alcohol consumed by these night-clubbers (i.e. even amongst this ‘going-out’ population, home-drinking was most drinking). So I decided to look at the ‘off-trade’ sector in the third project.

Rather than looking at the city centre Night-Time Economy, the ‘off-sales’ study (Forsyth et al, 2007) investigated licensed corner shops in residential communities. There were two relevant strands to this: First interviews with shopkeepers / servers and second a survey of alcohol-related litter.

In the first instance shop servers spoke at length of the anti-social behaviour which they were subjected to on a frequent basis and the considerable attempts they made to prevent this (i.e. responsible service). For example one interviewee spoke of groups of youths who would wander from shop to shop throughout the evening. Thus a picture was painted which was at odds with that of ‘Daniels report’ (http://www.scotland.gov.uk/Publications/2004/02/18764/31731). Rather than being generators of alcohol-related anti-social behaviour these shops were also victims of it. Moreover they were also falling victim to supermarket deep-discounting (on all products, including alcohol) and had found themselves becoming dependent on what ‘Daniels’ called ‘suspect products’ (e.g. Buckfast tonic wine) which the majors did not stock, simply to keep their businesses viable. However, unlike the majors, these shops were serving their local communities (from cradle to grave) and interviewees wished to keep doing so, and doing so safely (Forsyth & Davidson, 2008).

In the second instance, rather than a ‘broken bottles effect’, where outlet provision predicts problems, alcohol-related litter was predicted by local area deprivation alone (like so many other alcohol problems in Scotland). For example there was an accumulation of alcohol detritus outside one of the unlicensed shops in the survey area. Had that shop been licensed it no doubt would have been branded as a ‘polluter’ who would have to ‘pay’ (Forsyth & Davidson, 2010).

What was also apparent was the large number of superstore trolleys abandoned in the survey area (sometimes alongside alcohol detritus) and various items supermarket own-brand alcohol litter. As there were no superstores within the study area, and as own-brands only make-up a proportion of alcohol sales, it seems reasonable to assume that many ‘off-trade’ alcohol-related problems originate from the major superstores, though the resultant disorder takes place elsewhere – be it outside a local community shop, in a pub or at a nightclub door, often hours later.
In conclusion, any ‘social responsibility levy’ should be applied on industry more generally, perhaps based on turnover or tied to ‘minimum pricing’ in some way.

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

While I agree in principle to staggered age of purchase between sectors (and agree that ‘on-trade’ access should be first in such a scenario), I would much rather that this legislation was pitched the other way round, so that the age of ‘on-trade’ purchase was dropped to 16 (and ‘off-trade’ retained at 18). This may seem radical, but ‘Young People’ (defined as 16 and 17 year-olds) can already order from a restricted list alcoholic beverages in a licensed premise (i.e. cider, perry, wine or beer) so long as it is an accompaniment to a full meal (not before or after the meal). This could be relaxed. A Young Person could be permitted to purchase such low ABV beverages ‘on-trade’ without a meal. The legislation could be framed such that the Young Person is only permitted to do so if they are in the company of responsible adult (say aged over-21, e.g. parent, work colleague or senior officer).

This argument is based on research we conducted at the Glasgow Centre for the Study of Violence with young ‘street drinkers’ (Galloway et al, 2007), which found them feeling excluded from both adult recreation (which tends to be on licensed premises) and youth recreation (which tends to be pitched for those aged under-16, i.e. below the age of consent – a more important age limit in their view).

Why lengthen the time that Scotland’s young adults have to learn dysfunctional immoderate drinking habits? The habits of youth, (be it what football team you support or what your formative drinking years entailed) are known to be predictive of the habits of a lifetime. We already have a situation where many (perhaps most) Young People in Scotland have extensive illicit, unsupervised, immoderate drinking histories before they reach 17 years 364 days of age (and yet the following day we expect them to unlearn that and buy a bottle of malt whisky to drink responsibly).

This proposal scapegoats Young People and deflects attention from the fact that these problems affect all adult age groups in Scotland. If a form of ‘minimum pricing’ was introduced it may reduce under-16s access to alcohol more effectively.

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

Please note that this phenomenon is not restricted to financial incentives.

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References


