Alcohol etc. (Scotland) Bill

East Dunbartonshire Alcohol and Drug Partnership

Introduction

The East Dunbartonshire Alcohol and Drug Partnership welcomes the opportunity to comment on this important Bill. The Partnership recognises the wide ranging impact of alcohol misuse on individuals, families and communities and therefore the multi layered responses that are required. Analysis of the health, police, social work, criminal justice and economic costs of alcohol misuse to East Dunbartonshire are estimated in our joint alcohol policy at a cost of £24million a year. This was based on estimates from the total cost of alcohol misuse in Scotland as £2.25 billion in 2006-7; £500 per year for every adult living in Scotland (Scottish Government, May 08). Recent research by York Health Economics Consortium note that the mid point costs of alcohol misuse for 2007 comes to £3.5 billion, 7.5% of the cost of health service expenditure and 6.5% of social work expenditure (Scottish Government Research 2010).

Nevertheless, the Partnership is mindful of the importance of balancing individual choices and freedoms around alcohol use. Our response will focus on parts of the Bill that we support or dispute drawing on evidence based approach but being mindful of the balancing of individual choices.

Sections 1 and 2: Pricing of Alcohol

The Partnership is mindful of the controversy of this section of the Bill and of the arguments of the possible uneven impact on groups of the population of increasing the price of alcohol, nevertheless, it is supportive of the measure of minimum pricing of alcohol for two main reasons. Firstly, there is international evidence, cited as example in the explanatory notes for the Bill, linking price increase with decreasing alcohol misuse. Clearly, as the real price of alcohol has fallen in Scotland, the rate of alcohol use has risen in correlation to decreasing price. Secondly, the direct linking of price of alcohol to its unit strength rather than increasing price per se is an important acknowledgement of the impact of increasing strength of alcohol on health, crime and the social costs of alcohol misuse. It is recognised that increasing the minimum price per unit will impact on the cheapest, strongest drinks and will target changing drinking habits of the heavier drinkers.

The Partnership considered the issue of alternatives to increasing price per unit. Although alcohol policy on price needs to be co-ordinated with effective treatment responses and prevention and protection measures, the Partnership felt that price increase was the least restrictive measure to make significant in roads to Scotland’s alcohol consumption and resulting issues. Alternatives such as restricting availability could make further impacts on individual freedom.
The Partnership considered the possible negative impact of the policy on certain population groups. Some of the poorest people who are dependent drinkers may be disadvantaged by price increase and may make further sacrifices nutritionally.

The Partnership also felt that the Bill in general wasn’t focused on young people’s alcohol use and that fortified wines, in particular, will not be affected by the price increase. Further comments will be made in relation to young people later on in our submission.

In summary, the Partnership supports the minimum price increase but would like to see robust monitoring of the impact of the policy on alcohol use and impacts on health, social and crime costs. The Partnership is mindful of the recent UK Parliamentary Group on Alcohol suggesting a minimum price of 50p per unit to make significant impacts on health. It is suggested that a minimum price of 40p per unit however would make reasonable adjustment to alcohol use within the adult population whilst being possibly more acceptable to the general population.

There is a recognition that the rationale for this population level policy may be misunderstood and the link between population level drinking and alcohol related problems has not been well explained. The Partnership would hope to see the implementation of this policy linked with significant clear communication on the rationale and evidence base for this policy.

**Section 3: Restrictions on price of drinks at off sales**

The Partnership strongly supports limiting promotions within off sales that encourage discounted alcohol sales which have a link with excessive alcohol use, particularly within off sales. The Partnership therefore supports measures under this section. Given some of the loopholes of implementing such initiatives within the Licensing (Scotland) Act 2005, the Partnership would ask that the term “measures” is replaced by clearer terminology such as “alcohol in a liquid measure that is contained within any form of bottle, can, or container”.

**Section 8: Provision for raising the age of sale within local areas**

The Partnership understands the opposition especially from young people, to increasing the age at which young people can purchase alcohol to 21. There is however considerable evidence that delayed onset of first alcohol use has an impact on reducing alcohol related harm. Moreover, the Chief Medical Officer for England and Wales has recently pulled together international evidence suggesting that young people shouldn’t consume any alcohol until the age of 15. Changing the culture of alcohol use amongst young people needs to be nationally led and discussed out with the confines of this Bill. The Partnership believes that this section of the Bill is weak and has concerns that expecting a local licensing board "to have regard" to young people's alcohol use without guidance will lead to a mixed response from area to area. The
Partnership does welcome in principle the need for Boards to consult with young people.

In summary, the Partnership considers that because of the weakness of this section, the impact on the human rights of those aged between 18 and 21 and the responsibility placed on local areas to “have regard” to issues regarding young people, that this section cannot be supported in its format.

Section 10 and 11: Make provision for a Social Responsibility Fee

The Partnership found this a difficult area to come to conclusive decisions on. *In principle,* partners considered the costs of alcohol misuse on the Police, Health, Criminal Justice and Social Work/Care and ultimately the tax payer, to be an extensive and increasingly expensive burden for all concerned and we would therefore support the idea of the social responsibility fee in principle. The Partnership is aware however of the economic climate and the need to work in partnership with alcohol retailers.

In its current format, which is vague, it would be impossible to support such a proposal without further discussion and details.

Andy Martin
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