

Consultation:

We invite comments on the proposed minimum price of 50 pence per unit which is set out in the draft Scottish Statutory Instrument at Annex A.

Thank you for the opportunity to comment on the introduction of a minimum unit price of alcohol of 50 pence. We would like to take the opportunity to congratulate again the Scottish Government for pursuing this policy despite fierce opposition by the alcohol industry.

The Scottish Health Survey 2016 continues to show that that alcohol misuse is widespread in the Scottish population and affects men, women and children. Further work has established that harmful drinkers, who comprised 5.4% of the Scottish population consume 29.4% of alcohol, while hazardous drinkers who comprises 19.1 % of the Scottish population consume 41.5% of alcohol in Scotland.¹ Alcohol misuse is a driver of inequalities as 8 times more alcohol related hospital admissions and 6 times more alcohol related deaths occur in the most deprived quintile compared to the least deprived quintile. Part of the explanation for this is due to the fact that unlike moderate drinkers in the most deprived quintile who consume less alcohol compared to the rest of the population in Scotland, harmful drinkers consume more (4500 units per years V 3350) ¹. Minimum unit pricing would thus reduce health inequalities by reducing alcohol intake in the most deprived quintile of our population.

Another major concern that the introduction of a minimum unit price would help to address is the prevention of alcohol consumption by children and young people below the legal purchase age for alcohol. In 2008 31% of 15 year olds on Scotland were regularly consuming alcohol and alcohol misuse resulted involvement with the police and experimentation with illicit drugs.²

Both children and young people and harmful drinkers favour high strength, low cost alcohol. Court findings ruled that MUP was not disproportionate in that its introduction would target cheap alcohol favoured by hazardous and harmful drinkers.³ It would protect children and young people who are not legally permitted to drink alcohol but who, due to their limited resources, purchase high strength, low cost alcohol. On the other hand moderate drinkers would be minimally affected by this policy.

The MESAS report 2017 report found that the average amount paid for off-sales alcohol has increases slowly from 50p per unit in 2012 to 53p per unit in 2016. Throughout this period the average price of alcohol in the on trade has increased from £1.53 to £1.79, a 16.9% increase.⁴ Taking inflation into account it is likely that the relative increase in price of alcohol in the on sales

sector has resulted in alcohol becoming less affordable, while that in the off-sales sector, with its average price increase of 6% over this period, has become relatively more affordable. A minimum price of 50 pence will have a lesser impact in 2018 than it would have had had the measure been introduced in 2012.

The modelling work carried out by the Sheffield team in 2016 showed that the impact on moderate drinkers overall of a 50p minimum unit price would be £2/year, but for harmful drinkers this is estimated to be £6/year. The modelling estimates that there is a relatively steep increase in the cost of alcohol across all categories of drinker if the price per unit were set at 60p/unit (£8, £50 and £55 respectively for moderate, hazardous and harmful drinkers).¹ However, it does not specifically mention the impact of inflation and whether an increase in the MUP in line with inflation would be beneficial. Evidence indicates that the introduction of a MUP at 50p per unit will still be beneficial in 2018 and MUP should be introduced without delay. Once MUP has been introduced, there should be a commitment to revisit the level of MUP to ensure that it achieves its aim of reducing alcohol harm and its effects are not eroded due to inflation.

Scottish Government is also advised that the introduction of minimum unit pricing on its own is insufficient to prevent all alcohol problems in our population, but would be most effective when included in a comprehensive alcohol strategy similar to Changing Scotland's Relationship with Alcohol which combined a range of measures to encourage the development of a healthier relationship with alcohol⁵. These measures should be in line with the advice developed by the World Health Organisation and effectively target areas that will reduce population related harm. Two areas where further work would be beneficial and deserve closer attention are licensing and availability of alcohol and advertising. Given the limited impact that licensing has had on reducing the level of alcohol on our high streets and the fact that 95% of licensing applications have been granted since 2011/12, the widespread availability of alcohol could undermine the introduction of minimum unit pricing⁶. A second area that deserves closer inspection and action is the widespread advertising, sponsorship and exposure of the whole population, but particularly children and young people to alcohol advertising. Social media, which is used by children and young people more than their parents', is awash with alcohol advertising. Thus raising the price but continuing exposure to alcohol through sponsorship and advertising will diminish the impact of this measure.

Therefore it is important to consider the specific measures that the government intend to take in conjunction with minimum unit pricing to achieve the maximum benefit from this hard won victory.

References

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