



The Scottish Women's Convention

Response to the Scottish Government Health
and Sports Committee Consultation re:

Alcohol Etc. (Scotland) Bill

January 2010

Introduction

The purpose of the Scottish Women's Convention (SWC) is to communicate and consult with women in Scotland to influence public policy. Through the Convention's policy work, round table and celebratory events the SWC strives to have contact with women and relevant organisations. The SWC aims to provide an effective way of consulting with a diverse range of women in Scotland.

The Scottish Women's Convention has a network of over 300,000 women from relevant organisations throughout Scotland.

The following is the SWC submission to the Scottish Government Health and Sports Committee 20th January 2010 re:

Alcohol Etc. (Scotland) Bill

The Consultation invites comments on the following:

1. The advantages and disadvantages of establishing a minimum alcohol sales price based on a unit of alcohol.
2. The level at which such a proposed minimum price should be set and the justification for that level.
3. The rationale behind the use of minimum pricing as an effective tool to address all types of problem drinking.
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.
5. The advantages and disadvantages of introducing a social responsibility levy on pubs and clubs in Scotland.
6. The justification for empowering licensing boards to raise the legal alcohol purchase age in their area to 21.
7. The role of promotional offers and promotional material in encouraging people to purchase more alcohol than they intended.
8. Any other aspects of the Bill.

Background

The Scottish Government considers that the Alcohol (Scotland) Bill published by Nicola Sturgeon MSP, Cabinet Secretary for Health and Wellbeing, on the 26th November 2009 will help reduce alcohol consumption in Scotland.

The Scottish Government argues that each of the measures set out should be seen as a part of the wider tactical approach to addressing the issues of alcohol misuse set out in *Changing Scotland's Relationship with Alcohol: A Framework for Action*.¹

The main purposes of the Bill are to-

- Introduce a minimum sales price for a unit of alcohol;
- Introduce a restriction for off-sales on supply of alcoholic drinks free of charge or at a reduced price;
- Make provision in law with respect to the sale of alcohol to under 21s;
- Restrict the location of drinks promotions in off-sales premises;
- Introduce a requirement for licence holders to operate an age verification policy;
- Make provision in law for a social responsibility levy on licence holders.

Responses communicated in the media from the public, businesses and other stakeholders suggest the most controversial aspect included within the Bill is the proposal to introduce a minimum price for alcohol. The Scottish Government believe that this measure will help reduce consumption and have provided evidence to support this position.

SWC Response

Recent independent research suggests that the misuse of alcohol is estimated to cost the Scottish Government a total of between £2.48 billion and £4.64 billion - with a mid-point estimate of £3.56 billion². The Scottish Ambulance Service has estimated that 68% of weekend night calls are alcohol related.³ Statistics also confirm 1:20 female hospital discharges are alcohol attributable and 1:4 Scottish women are exceeding safe daily limits for alcohol.⁴

The SWC acknowledge that the relationship between alcohol and domestic violence is a controversial and sensitive subject. We support the view that there is no evidence that alcohol alone causes domestic violence; nonetheless, there is evidence that where violence exists, alcohol is often present.

Using the above statistics as an illustration there is little doubt that alcohol misuse is a major health, economic and social challenge for Scotland. The SWC therefore welcomes Scottish Government commitment to tackle this issue as outlined in the Framework for Action – *Changing Scotland's Relationship with Alcohol*.

It is clear from the reporting of reactions to the Alcohol (Scotland) Bill that the most controversial aspect is the proposal to introduce a minimum price for alcohol in Scotland.

¹ <http://www.scotland.gov.uk/Publications/2009/03/04144703/0>

² http://www.alcoholinformation.isdscotland.org/alcohol_misuse/1395.html#6607

³ <http://news.stv.tv/scotland/128096-ambulance-crews-reveal-alcohol-costs/>

⁴ <http://www.isdscotland.org/isd/5964.html>

Alcohol consumption in Scotland is a topic that has been discussed by women at a number of SWC Roadshows and other consultative events. Women have expressed a number of views or concerns regarding the culture of drinking in Scotland and the continued high levels of alcohol misuse. There was widespread agreement in the regions we visited that this should be a Scottish Government priority due to the social and economic consequences incurred by the misuse of alcohol.

Conversely, the value of introducing a minimum pricing policy did not provoke the same level of consensus or consistency of opinion among the women. The most persistent view was that it would be unlikely to have a widespread impact in reducing the intake of those drinking at dangerous or hazardous levels and only a limited effect on violent behaviour as a result of consumption.

Women are familiar with publicity surrounding the question of minimum pricing but many feel confused about the many levels of pricing, alcohol units and drinks comparison being used to illustrate the effect on the consumer. Advantages get lost in the myriad of information used by different stakeholders. It is generally agreed that establishing the benefits would be difficult without detail of the minimum price being established in the first instance. As it stands the Bill only set out an enabling power rather than express detail of a minimum price.

For example, the impact would vary quite widely between minimums set at 40 pence or 60 pence. Women said at the lower end it would have no real impact on habitual or hazardous drinkers as the price rise was not sufficiently significant to deter those people intent on drinking. Equally, it was believed that set at the high end it would unfairly and unreasonably punish those with a sensible and moderate relationship with alcohol.

Feedback confirmed women generally felt that focusing on a minimum price to manage consumption was not a strategy most suited to challenging Scotland's social habits or relationship with alcohol. The SWC found there was a strong belief among participants that this method of addressing alcohol issues assumed hazardous drinking was predominant amongst those who live in areas of social and economic exclusion.

It was suggested that while the effects can be more obvious in these communities this can be the result of multiple deprivation rather than one singular cause. Many felt that minimum pricing would not improve unhealthy and unsocial drinking habits in wealthier socially inclusive households but would unfairly discriminate against those with lower incomes who enjoy moderate drinking.

There was an acceptance that the minimum price strategy put forward by the Scottish Government hoped to tackle the high alcohol, poor quality "pocket money price" beers and ciders available in supermarkets and other off license stores, particularly as these are attractive to underage drinkers. A significant number who drink this type of alcohol are underage and should not be able to purchase alcohol of any kind. For this reason the SWC are unclear how setting a minimum price will provide any advantages in overcoming the continuing problem of underage drinking.

Consultation with young women under the age of 18 confirms that in some cases they do undoubtedly drink alcohol because it is “cheap”. By far the more compelling reason is that they are bored. Many lack the local affordable facilities that offer alternatives to drinking.

Many of the women consulted by the SWC asked why the Scottish Government, through a minimum pricing strategy, is focusing on the consumer in an attempt to avert drinkers from low cost, high strength alcohol brands. They questioned why the Government is not instead challenging the licensing or authority that allows companies to produce inferior, high potency, cheap brands of alcohol and permits their availability on the market.

The SWC have noted particular concerns that the anticipated increase in the cost of these brands, should a minimum price be introduced, will result in improving profits for producers and retailers. There would be no opportunity to target the increased income towards alcohol education, treatment or policing for enforcement activity.

Suggestions put forward as alternatives to minimum pricing include a ban on sales of alcohol below cost and targeted recovery of a portion of costs from those who repeatedly engage the emergency services as a result of binge or hazardous drinking activities.

It is the view of the SWC that until a minimum price figure is set many of the advantages referred to by the Scottish Government are speculative and it is therefore difficult to take a policy position on minimum pricing at this time. We suggest that further assessment be undertaken by the Scottish Government to clarify the necessity for minimum pricing as part of a wider strategy to curb alcohol abuse in Scotland.

The SWC can see the advantages of introducing a social responsibility levy on pubs and clubs in Scotland. Revenue raised by the charge would hopefully be used by local authorities to contribute to the cost of dealing with the adverse effects of the operation of these businesses, for example cleaning or extra policing.

It is important that the conditions attached to a social responsibility levy are understood between local and central government and the drinks industry. The SWC believe anti-social behaviours stemming from alcohol misuse are frequently due to the industry failing to adopt and apply consistently its own voluntary social responsibility standards. We strongly believe this should be an issue the Scottish Government must confront the drinks industry about if the drinking culture in Scotland is to improve.

Women have also told us they think it would be unfair if the burden of paying this levy is passed on to responsible drinkers through increased on-sale costs in these pubs and clubs.

Women have been mainly positive in relation to giving licencing boards the power to raise the legal alcohol purchase age to 21 years in a designated area or over a number of premises within their control. A number of women were aware of pilot schemes which suggested such action resulted in a reduction in anti-social behaviour and criminal activity. Nevertheless there were also caveats to their approval of this type of local empowerment. It was generally felt that explicit guidance must be provided by central government authorities on what conditions should apply before exercising this power.

Monitoring should be regular to ensure consistency of approach and application. Women told the SWC it was essential that this power should not be used or seen as a means of social engineering.

The SWC strongly support the need to address the issue of promotional offers and promotional material in encouraging people to purchase more alcohol than they intended. In our consultations with women this was an issue which most women immediately referred to as a contributing factor in Scotland's unhealthy relationship with alcohol.

Any strategy used to reduce alcohol consumption through price must also look at below cost selling (this would apply to high cost brands that do not fall below the minimum threshold). The Scottish Government must be prepared to challenge supermarkets and other outlets offering these deals. Retailers would be unlikely to use these marketing practices if they led to lower profits as their purpose is to increase volume of sales of these and other products with higher profit margins. Any loss incurred by below costs sales will be made up by the customer in some way. The Scottish Government should be asking these large supermarket chains the question - if minimum pricing was introduced will the supermarket respond to the change by reducing prices on other healthier food items instead of pocketing the profit?

The SWC recognise through consultation with women on issues of alcohol abuse that there is no simple link that joins problems with solutions. The majority of women have told us they believe that those with severe or habitual alcohol issues will be unlikely to be "price sensitive" and will seek alternative sources or means of maintaining supply at an affordable price. Others have suggested that focusing on a price/consumption approach to the issues will allow other root causes of alcohol misuse to flourish, namely market influences and Scotland's ambivalent attitudes towards their drinking culture.

Women have told the SWC they want attention paid by policymakers to the influence of advertising and the sometimes irresponsible promotion of alcohol. Advertising is often targeted at a younger market and can align alcohol with seductive or socially positive environments. This is a strong but potentially misleading portrayal of the reality of where and how many young people begin or continue their association with alcohol.

Most women have said that early and continued education on alcohol must be a core strategy to halt the cultural identity Scotland has developed as a nation where drinking is perceived as a national pastime.

We are right to have to pride in our whisky traditions, hospitality and celebrations but this must be balanced with educating society in recognising that Scotland has a dangerous relationship with alcohol.

If you require further information or additional copies of this report please contact

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All SWC reports and consultation responses can be accessed on our website
<http://www.scottishwomensconvention.org/what-we-do.asp>



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