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# Consultation

In response to the Home Office  
consultation seeking views on the  
Government's revised Alcohol Strategy



*6<sup>th</sup> of February 2013*



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Averroes is a think-tank and legal advocacy organisation which aims to principally engage in legal and political processes to directly affect positive change for wider society. In particular, Averroes seeks to reflect the opinion of British Muslims in matters of public policy.

We have formulated our response to the Government's Alcohol Strategy consultation through engaging with key stakeholders within the British Muslim community and grass roots Muslim community organisations on the issues addressed in this consultation.

We will respond to 3 of the 5 areas open for discussion in the Government's Alcohol Strategy Consultation. These include:

1. Minimum unit pricing
2. Multi-Buy promotions in the off-trade
3. Reviewing mandatory licensing conditions

## **Questions On Minimum Unit Pricing**

### **Question 1**

*The impact of minimum unit pricing will depend on the price per unit of alcohol. The government wants to ensure that the chosen price level is targeted and proportionate, whilst achieving a significant reduction of harm. The government is therefore consulting on the introduction of a recommended minimum unit price of 45p.*

*Do you agree that this minimum unit price level would achieve these aims?*

**YES**

*If you think another level would be preferable, please set out your views on why this might be (keeping your views to a maximum of 200 words):*

We suggest setting the minimum price of alcohol at 50p per unit. We believe that setting such a price must be done after considering the scientific evidence on the issue and to our knowledge, the SchARR<sup>1</sup> study is the only independent, peer-reviewed piece of research examining the issue of minimum pricing at a level of 50p. Comparing their figures to that of the Government, we can conclude that over a 10 year period minimum unit pricing at 50p would result in:

1. 31,500 fewer hospital admissions
2. 176,000 less absent days from work secondary to alcohol
3. 18,400 fewer crimes
4. 1,020 more lives saved

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<sup>1</sup> Purshouse, R. et al. (2009) 'Modelling to assess the effectiveness and cost-effectiveness of public health related strategies and intervention to reduce alcohol attributable harm in England using the Sheffield Alcohol Policy Model version 2.0'



The economic impact of this would be as follows:

1. £1.6bn savings in direct health costs
2. £408m savings in direct crime costs
3. £5.6bn savings in work-related costs
4. £2.1bn in QALY gains
5. Total savings of £9.7bn

The economic and public health benefits from a minimum unit price of 50p are clear, and we feel that this level is in the interest of the wider British public.

### Question 2

*Should other factors or evidence be considered when setting a minimum unit price for alcohol?*

**YES**

*If yes, then please specify these*

The principle issue to consider would be the experience of other countries. In current proposals, Scotland is considering setting a minimum price of 50p. Should England go on to set a level of 45p, this would have the potential on putting unnecessary pressure in the north of the country, where people from Scotland may have the tendency to visit England to acquire cheaper alcohol. This may adversely affect the public health benefits of minimum pricing in these areas.

Although no other country has enforced a minimum unit price for alcohol, eight out of ten provinces in Canada have some sort of minimum pricing scheme on alcohol sales, and analysis of these schemes by academics at the University of Victoria<sup>2</sup> concluded that they resulted in a rapid fall in consumption, alcohol related crime and hospital admissions. Furthermore, there was a reduction in alcohol related chronic illnesses over a two to four year period.

Minimum pricing of Alcohol will also lessen the disparity between pricing of alcohol in on-trade premises and the off-trade. This is particularly important, as it will encourage people to consume alcohol in pubs and bars, where safer drinking is encouraged in a regulated environment.

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<sup>2</sup> Stockwell T et al. The raising of minimum alcohol prices in Saskatchewan, Canada: impacts on consumption and implications for public health. Am J Public Health. 2012 Dec;102(12):e103-10



Question 3

*How do you think the level of minimum unit price set by the Government should be adjusted over time?*

The minimum unit price should be updated in line with inflation on an annual basis.

Question 4

*The aim of minimum unit pricing is to reduce the consumption of harmful and hazardous drinkers, while minimising the impact on responsible drinkers.*

*Do you think that there are any other people, organisations or groups that could be particularly affected by a minimum unit price for alcohol?*

**YES**

*If yes, please specify in the box below*

Through our engagement with key stakeholders within the British Muslim Community and Muslim community groups, we feel that the measures proposed will have a positive effect in decreasing hate crime (including Anti-Muslim Hate Crime<sup>3</sup>), some of which is known to be associated with alcohol abuse. We also feel that women and children will benefit from the proposals, as we anticipate that stricter controls on alcohol pricing and subsequent decreased consumption will decrease the incidence of domestic abuse.

**Questions on Multi-Buy Promotions**

Question 5:

*Do you think there should be a ban on multi-buy promotions involving alcohol in the off-trade?*

**YES**

Question 6

*Are there any further offers which should be included in a ban on multi-buy promotions?*

**YES**

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<sup>3</sup> Islamophobia and Anti-Muslim Hate Crime, An Introduction to a 10 year Europe Wide Research Project. European Muslim Research Centre, University of Exeter.



*If yes, please specify in the box below (keeping your views to a maximum of 100 words).*

It may be possible for vendors of alcohol to circumvent the minimum pricing strategy through the use of offers. Examples of offers we feel that should be banned include:

1. The ability to purchase alcohol through supermarket loyalty schemes
2. The association of purchasing free alcohol with another supermarket item
3. Alcohol should be excluded from discount couponing.

Question 7

*Should other factors or evidence be considered when considering a ban on multi-buy promotions?*

**YES**

*If yes, please specify in the box below (keeping your views to a maximum of 200 words).*

We feel it is extremely important that minimum unit pricing and a ban on multi-buy promotions should be introduced together. By failing to ban multi-buy promotions it will be easily possible to circumvent minimum unit pricing. In addition, the SchARR study concluded that a ban on multi-buy promotion would have maximum impact only if implemented with minimum unit pricing.

We feel that there also should be some legislation pertaining to the way in which alcohol is marketed. In particular, the marketing strategies should not go against the spirit and essence of what is being proposed. This will require monitoring through Trading Standards, to ensure the measures are being enforced and that marketing strategies are in 'agreement' with this.

Finally, we believe the efficacy of these measures would be heightened with a high impact public health campaign to educate the public on the dangers of excess alcohol intake.

Question 8

*The aim of a ban on multi-buy promotions is to stop promotions that encourage people to buy more than they otherwise would, helping people to be aware of how much they drink, and to tackle irresponsible alcohol sales. Do you think that there are any other groups that could be particularly affected by a ban on multi-buy promotions?*

**YES**

*If yes, please specify in the box below (keeping your views to a maximum of 100 words).*

We believe the following groups will be particularly affected by a ban on multi-buy offers:



1. Members of deprived communities, who are at risk of drinking excessively if it is easily available at a cheap price<sup>4</sup>
2. Younger people will also benefit from reduced access and availability of cheap alcohol
3. Pubs are likely to benefit from this strategy, as people will be encouraged to drink on licenced premises. This will subsequently lead to safer drinking behaviour.

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## Questions of Mandatory Licensing Conditions

### Question 9

*Do you think each of the mandatory licensing conditions is effective in promoting the licensing objectives (crime prevention / public safety / public nuisance / prevention of harm to children)?*

	Prevention of Crime and Disorder	Public Safety	Prevention of Public Nuisance	Protection of Harm from Children
Responsible Promotion	Yes	Yes	Yes	No
Dispensing alcohol directly into the mouth	Yes	Yes	Yes	No
Mandatory provision of free tap water	Yes	Yes	Yes	No
Age verification policy	Yes	Yes	Yes	Yes
Mandatory provision of small measures	Yes	Yes	Yes	Yes

### Question 10

*Do you think that the mandatory licensing conditions do enough to target irresponsible promotions in pubs and clubs?*

**NO**

*please specify in the box below*

We feel the issue of marketing and promotion needs to be taken extremely seriously. Under current guidance, marketing material will be banned if it glamourises alcohol. We feel this should be extended to a ban on all drinks promotions which are deemed to be irresponsible.

From our experience and engagement with physicians, many people are unable to calculate their weekly alcohol unit intake. This is clearly illustrated by the fact that 41% of men and 34% of women drink above the recommended limit of alcohol without realising<sup>5</sup>. This is

<sup>4</sup> Harrison L and Gardiner E, Do the rich really die young? Alcohol-related mortality and social class in Great Britain, 1988-1994. Addiction 1999, vol. 94 (12) pp 1871-1880



problematic, as it means people are unable to measure their weekly intake with the maximum recommended levels (which are quantified in units). We therefore feel that unit content of all alcoholic beverages should be clearly marked, so people can track their intake accurately.

Epidemiological evidence clearly shows a correlation between anti-social behaviour and excessive alcohol intake in younger people<sup>6</sup>. Age verification schemes must therefore be strictly enforced and we believe the minimum age for drinking should be increased to prevent selling of alcohol to those under the age of 21. Moreover, a 'check 25' scheme should be enforced, where all those under the age of 25 should be expected to verify their age. This must be enforced in conjunction with mandatory signage to inform patrons of this policy, and adequate training of staff.

#### Question 11

*Are there other issues related to the licensing objectives (prevention of crime and disorder / public safety / prevention of public nuisance / protection of children from harm) which could be tackled through a mandatory licensing condition?*

**YES**

*If yes, please specify in the box below*

We believe there are a number of measures which could be enforced to encourage safer drinking behavior. These include:

1. Soft drinks should be priced cheaper than the cheapest alcoholic drink.
2. The ban on irresponsible drink promotions should be extended to the off trade.
3. Happy hours which encourage people to drink relatively large amounts of alcohol within a short space of time should be banned.
4. Ladies nights (where discounted or free drinks are offered to ladies) should be banned as they promote excessive alcohol intake
5. Organised pub crawls should be banned as they promote large volume drinking, leading to drunken and anti-social behaviour.

#### Question 12

*Do you think the current approach, with five mandatory licensing conditions applying to the on-trade and only one of those to the off-trade, is appropriate?*

**NO**

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<sup>5</sup> Alcohol Concern, How Much is Too Much?

<sup>6</sup>Consultation on Children, Young People and Alcohol, Department for Children, Schools and Families.



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*please specify in the box below*

We believe there needs to greater parity with the licensing conditions between the on-trade and the off-trade. It must be remembered that the ultimate aim of this legislation is to promote safe drinking behavior which is in the interest of the British public, so there must be agreement in the principle of legislation applying to the on-trade and off-trade. For example, we believe the ban on irresponsible drinks promotions should be extended to cover off-trade licensed premises to create a consistency across the on- and off-trades.

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