



## CONSULTATION ON DELIVERING THE GOVERNMENT'S POLICIES TO CUT ALCOHOL FUELLED CRIME AND ANTI-SOCIAL BEHAVIOUR

**Response from Alcohol Focus Scotland  
February 2013**

### About Alcohol Focus Scotland

Alcohol Focus Scotland (AFS) is Scotland's national alcohol charity. We advocate for evidence-based policy interventions to reduce the burden of alcohol-related harm and we work to provide accurate and accessible information about alcohol to policy-makers, practitioners, the media, and the general public. Alcohol Focus Scotland is happy for the information contained in this response to be made publicly available.

### Response to specific consultation questions

**The Government wants to ensure that the chosen minimum price level is targeted and proportionate, whilst achieving a significant reduction of harm.**

#### Consultation Question 1:

**Do you agree that this MUP level would achieve these aims? (Please select one option)**

Yes

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No

☐

Don't know

☐

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

Minimum unit pricing is an effective, proportionate and targeted approach to reduce harm that will have a particular impact on younger and heavier drinkers who are most sensitive to changes in price.

It is critical that the minimum price is set at a level that the best available evidence indicates will be effective in achieving a significant reduction in alcohol-related harm.

Peer reviewed modelling work carried out by the University of Sheffield in 2009 indicates that setting a minimum unit price of 50p would have significantly greater benefits than 45p. A minimum price of 50p would save 3,060 lives (more than 1000 more than at 45p); 97,700 hospital admissions (31,500 more than at 45p); reduce absences at work by 442,300 days (more than 176,000 at 45p); reduce crimes by 45,000 (18,000 more than at 45p).

Moreover, experience and evidence from the introduction of minimum pricing in some Canadian provinces (Stockwell et al 2012) has shown that decreases in consumption have been proportional to price. Those provinces which set a higher minimum price achieved greater reductions in consumption.

In 2012 the Scottish Government passed the Alcohol (Minimum Pricing) (Scotland) Act and agreed to set the minimum unit price at the level of 50p. The Westminster Government setting a minimum price of 50p would therefore ensure consistency across the country, thus reducing concerns expressed by some of the potential for cross-border trading.

**Consultation Question 2:****Should other factors or evidence be considered when setting a minimum unit price for alcohol?****(Please select one option)**

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Don't know	<input type="checkbox"/>
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*If yes please specify in the box below (keeping your views to a maximum of 200 words)*

It is critical that a mechanism is put in place to review and set the minimum unit price in relation to the overall affordability of alcohol. The original modelling work for England carried out by the University of Sheffield was published in 2009. Since then inflationary increases mean that the benefits which were stated at a level of 50p per unit would today require the minimum price to be set at 54p to have the same effect. Therefore to ensure on-going and sustainable effectiveness, any new legislation must include a robust and independent mechanism to review and adjust the minimum price so it continues to be set proportionately to levels of affordability. Such a mechanism would ensure that the price would be set at a level at which significant health and other benefits continue to be realised.

**Consultation Question 3:****How do you think the level of minimum unit price set by the Government should be adjusted over time? (Please select one option)**

Do nothing – the minimum unit price should not be adjusted	<input type="checkbox"/>
The minimum unit price should be automatically be updated in line with inflation each year	<input checked="" type="checkbox"/>
The minimum unit price should be reviewed after a set period	<input type="checkbox"/>
Don't know	<input type="checkbox"/>

**Consultation 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?****(Please select one option)**

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Don't know	<input type="checkbox"/>
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*If Yes please specify in the box below (keeping your views to a maximum of 100 words)*

The harm alcohol causes to people other than the drinker is a significant concern. Others who would benefit include:

- Children: an estimated 30% of children live with an adult binge drinker, 22% with a hazardous drinker and 2.5% with a harmful drinker (Children's Commissioner 2012)
- Families: alcohol is a contributory factor in around 40% of domestic abuse incidents (Home Office 2010)
- Communities: by reducing crime, social disorder and helping to improve the safety of community spaces including town and city centres.
- Emergency services: reducing alcohol-fuelled assaults on emergency services staff, as well as time and money saved dealing with the effects of excessive alcohol misuse.

**Consultation Question 5:**

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

**(Please select one option)**

Yes

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No

☐

Don't know

☐**Consultation Question 6:**

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

**(Please select one option)**

Yes

☒

No

Don't know

If Yes please specify in the box below (keeping your views to a maximum of 100 words)

Alcohol is not an ordinary product – it is an addictive substance that causes more than 60 medical conditions. Alcohol Focus Scotland supports prohibiting:

- multi-buy or volume-based discounts in the on-trade as well as the off-trade
- money off or reductions to other products or services in conjunction with an alcohol sale
- loyalty or voucher points or other associated reward systems for alcohol purchases.

**Consultation Question 7:**

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

**(Please select one option)**

Yes

☒

No

Don't know

If Yes please specify in the box below (keeping your views to a maximum of 200 words)

Experience in Scotland shows that to ensure maximum effectiveness, the ban on multi-buy promotions must be implemented alongside minimum pricing and across the UK. When the ban came into effect in Scotland in October 2011, many of the major supermarkets sought to undermine the spirit of the legislation, firstly by encouraging online purchasing of alcohol from distribution centres in England and secondly by reducing the price of individual products. Indeed, figures published in The Grocer in November 2011 showed that in the first four weeks following the ban the number of individual products on price reduction promotions increased significantly, from 753 to 1,178. Whilst legal, these practices call into question the large supermarkets claims to be responsible retailers and reinforce the case for a ban on multi-buy promotions to be introduced in conjunction with minimum unit pricing.

Alcohol Focus Scotland feels consideration should also be given to restricting the overall number of discounts stores can offer. A report in The Telegraph in 2012 highlighted research which showed that 71% of alcohol sold in the UK was sold at a discount – this is significantly higher than in other European countries with the next closest being the Netherlands at 30%, and Germany at 19% and France at 22%.

**Consultation 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?

(Please select one option)

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Don't know	<input type="checkbox"/>
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If Yes please specify in the box below (keeping your views to a maximum of 100 words)

The aim of the ban, when used in conjunction with minimum unit pricing, is to reduce overall alcohol consumption. A wealth of evidence exists which shows that when consumption falls alcohol-related harms reduce correspondingly. This will have benefits to many other groups as described at Question 4.

Community pubs would also benefit from this measure. Cheap alcohol sold in supermarkets has contributed significantly towards the shift to home drinking patterns and to the decline of business in the on-trade.

**Consultation 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)?

Please state Yes/No/Don't know in each box

		Prevention of crime and disorder	Public Safety	Prevention of public nuisance	Protection of harm to children
A	Irresponsible promotions	Yes	Yes	Yes	Yes
B	Dispensing alcohol directly into the mouth	Yes	Yes	Yes	Yes
C	Mandatory provision of free tap water	Yes	Yes	Yes	Yes
D	Age verification policy	Yes	Yes	Yes	Yes
E	Mandatory provision of small measures	Yes	Yes	Yes	Yes

**Consultation Question 10:**

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

(Please select one option)

Yes	No <input checked="" type="checkbox"/>	Don't know
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If no please state what more could be done in the box below (keeping your views to a maximum of 100 words)

All promotions which encourage and/or reward drinking to excess should be prohibited. For pubs and clubs this should include:

- Price-based promotions.
- Happy hours or other promotions that cut prices during specified times.

- The sale of alcoholic drinks in areas other than bar areas e.g. shots or 'test tubes' sold by staff on the premises floor.
- Organised pub-crawls which encourage excessive consumption of alcohol within a short space of time.
- The sale of alcoholic drinks in large containers for direct consumption.

Similar measures have been implemented in Scotland since 2009 by the Licensing (Scotland) Act 2005.

**Consultation 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? (Please select one option)**

Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	Don't know <input type="checkbox"/>
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If Yes please specify in the box below (keeping your views to a maximum of 200 words)

Scotland successfully introduced mandatory training for licensing board members, licence-holder and staff of licensed premises in 2009. This training includes responsible operation of licensed premises, the effect of irresponsible operation on society and health among other topics with the aim of creating safer drinking environments and reducing alcohol harm. The UK Government should introduce similar mandatory training across the UK.

Additionally there should be mandatory licensing conditions to cover the following:

- Non-alcoholic drinks should be sold at cheaper prices than the cheapest alcoholic drink,
- Free water should be visible and easily accessible to customers,
- Smaller measures of alcoholic drinks should be actively promoted.

**Consultation 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? (Please select one option)**

Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	Don't know <input type="checkbox"/>
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If no please explain why you think the current approach is not the best approach in the box below (keeping your views to a maximum of 100 words)

Mandatory licensing conditions should be extended to address irresponsible promotions in off-sales. Across the UK, off-trade sales of alcohol are greater than on-trade sales with a majority of people consuming alcohol at home. The Licensing (Scotland) 2005 Act introduced a restriction on the place of display in the off-trade. Further conditions were introduced for the off-trade by the Alcohol etc. (Scotland) Act 2010 including:

- Ban on quantity discounts.
- Restrictions on alcohol display and promotions in off-sales.
- Mandatory Challenge 25 age verification policy.

Alcohol Focus Scotland would encourage the Government to apply similar restrictions to tackle off-trade alcohol sales as a key contributor to alcohol related harm in the UK.

**Consultation Question 13:**

**What sources of evidence on alcohol-related health harm could be used to support the introduction of a cumulative impact policy (CIP) if it were possible for a CIP to include consideration of health?**

Please specify in the box below (keeping your views to a maximum of 200 words)

Alcohol Focus Scotland would encourage the UK Government to follow Scotland's lead in introducing protecting and improving public health as a fifth licensing objective, rather than tying it specifically to Cumulative Impact Policies (CIP). This would allow licensing boards to give full consideration to the impact of alcohol-related harm and how this links to the overall availability of alcohol across the area they serve. There is a variety of sources of evidence which could be used:

- Alcohol-related hospital admissions
- Alcohol-related deaths
- Chronic liver disease deaths and hospital admissions
- Alcohol-related brain damage
- Proportion of individuals who are alcohol dependent
- Alcohol-related ambulance call-outs
- Alcohol-related A&E attendances
- Alcohol Brief Interventions

It should be noted that some useful and vital data will not be available at neighbourhood level, rather intermediate datazone, local authority or health board level data will need to be considered.

**Consultation Question 14:**

**Do you think any aspects of the current cumulative impact policy process would need to be amended to allow consideration of data on alcohol-related health harms? (Please select one option)**

Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	Don't know <input type="checkbox"/>
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If yes please specify which aspects in the box below (keeping your views to a maximum of 200 words)

In order for health data to be used effectively it may be necessary to consider the data at intermediate datazone, district-wide, local authority or health board level. This further strengthens the argument for introducing protecting and improving public health as a fifth licensing objective rather than tying it specifically to CIPs as neighbourhood level data may be less robust.

Based on experience of the use of health data in recent licensing decisions in Scotland, we would recommend the provision of guidance to licensing board members and public health officials on the preparation, presentation and interpretation of such data. This tends to be a new area of consideration and influence for both sets of stakeholders so guidance would be essential to support the process.

**Consultation Question 15:**

**What impact do you think allowing consideration of data on alcohol-related health harms when introducing a cumulative impact policy would have if it were used in your local area? Please specify in the box below, keeping your views to a maximum of 200 words. Please provide evidence to support your response.**

There is clear evidence that availability, consumption and harm are linked ([WHO 2010](#)). Harm from alcohol goes beyond public drunkenness and anti-social behaviour. The increased proportion of alcohol sold from the off-trade has fuelled a change in drinking patterns, with a majority of people now drinking at home. Licensing authorities must therefore now consider the overall availability of alcohol in their area when analysing alcohol harm. Health data provides an essential component to the development of alcohol harm profiling across larger areas or communities.

Scottish licensing boards have a responsibility to regulate the availability of alcohol and standards of sale in the licensed trade. The process is supported by the development of a statement of licensing policy, which must seek to promote the licensing objectives. Health data has contributed positively to this process, particularly in the last two years.

West Dunbartonshire licensing board gave full consideration to health data alongside crime and community data in the development of their policy. Using a scoring system, they considered alcohol-related harm at intermediate datazone level. The health data in particular contributed to the resulting overprovision statement which declared a majority of West Dunbartonshire as overprovided for. The licensing board is now enabled to refuse licensing applications on the basis of overprovision as a method of protecting and improving the health of their community.

**Consultation Question 16:**

**Should special provision to reduce the burdens on ancillary sellers be limited to specific types of business, and/or be available to all types of business providing they met key criteria for limited or incidental sales? (Please select one option in each row)**

	<b>Alcohol Focus Scotland do not agree with these proposals and so have chosen not to answer this question – please see Question 18 for details of objections.</b>	Yes	No	Don't know
A	The provision should be limited to a specific list of certain types of business and the kinds of sales they make			
B	The provision should be available to all businesses providing they meet certain qualification criteria to be an ancillary seller			
C	The provision should be available to both a specific list of premises and more widely to organisations meeting the prescribed definition of an ancillary seller, that is both options A and B			

**Consultation Question 17:**

**If special provision to reduce licensing burdens on ancillary sellers were to include a list of certain types of premises, do you think it should apply to the following? (Please select one option in each row)**

		Yes	No	Don't know
A	Accommodation providers, providing alcohol alongside accommodation as part of the contract –		X	
B	Hair and beauty salons providing alcohol alongside a hair or beauty treatment		X	
C	The provision should be available to both a specific list of premises and more widely to organisations meeting the prescribed definition of an ancillary seller, that is both options A and B		X	
D	Florists providing alcohol alongside the purchase of flowers		X	
E	Regular charitable events providing alcohol as part of the wider occasion		X	

**Consultation Question 18:**

**Do you have any suggestions for other types of businesses to which such special provision could apply without impacting adversely on one or more of the licensing objectives? Please write your suggestion in the box below, keeping your views to a maximum of 200 words)**

Over the last 30 years a combination of deregulation and liberalisation of licensing laws and aggressive marketing has led to alcohol becoming more available and more affordable than at any other time in recent history. This deregulation has fuelled consumption, and as consumption has increased, so too has the health and social harm caused by alcohol. In England and Wales over one hundred people die every week from alcohol-related liver disease and alcohol is associated with 1 in 4 deaths among young people aged 15 to 24.

**Therefore, Alcohol Focus Scotland strongly disagree with the proposed further liberalisation of existing licensing laws to reduce the burden on any business to make it easier to sell alcohol.**

Alcohol is not an ordinary commodity and should not be treated as such by any business wishing to sell or provide alcohol to customers.

Reducing existing licensing requirements for ancillary sellers would serve to reinforce the normalisation of the consumption of alcohol through increased availability. The WHO (2012) states that, 'An increased density of alcohol outlets is associated with increased levels of alcohol consumption among young people, increased levels of assault, and other harm such as homicide, child abuse and neglect, self-inflicted injury and, with less consistent evidence, road traffic accidents.'

In addition, research in Scotland in 2012 suggested a link between increased alcohol use in young people in relation to the density and proximity of off-trade outlets.



**Consultation Question 19:**

The aim of a new 'ancillary seller' status is to reduce burdens on businesses where the sale of alcohol is only a small part of their business and occurs alongside the provision of a wider product or service, while minimising loopholes for irresponsible businesses and maintaining the effectiveness of enforcement (see paragraphs 9.2 and 9.3). Do you think that the qualification criteria proposed in paragraph 9.6 meet this aim? (Please select one option)

Yes

No ☒

Don't know

If no please describe the changes you would make in the box below (keeping your views to a maximum of 200 words)

As outlined at Question 18 this proposal would serve to reinforce the current culture, created by years of deregulation and liberalisation, of alcohol being a normal part of everyday life. Moves to further deregulate the licensing system in this way would therefore give serious cause for concern in terms of the impact on health and social harm.

**Consultation Question 20:**

Do you think that these proposals would significantly reduce the burdens on ancillary sellers?(Please select one option in each row)

	<b>Again we disagree with these proposals and so have chosen not to answer this question.</b>	Yes	No	Don't know
A	Allow premises making ancillary sales to request in their premises licence application that the requirement for a personal licence holder be removed			
B	Introduce a new light touch form of authorisation for premises making ancillary sales – an 'ASN' but retain the need for a personal licence holder			
C	Introduce a new light touch form of authorisation for premises making ancillary sales – an 'ASN' but with no requirement for a personal licence holder			

**Consultation Question 21:**

Do you think that the following proposals would impact adversely on one or more of the licensing objectives? (Please select one option in each row)

		Yes	No	Don't know
A	Allow premises making ancillary sales to request in their premises licence application that the requirement for a personal licence holder be removed	X		
B	Introduce a new light touch form of authorisation for premises making ancillary sales – an 'ASN' but retain the need for a personal licence holder	X		
C	Introduce a new light touch form of authorisation for premises making ancillary sales – an 'ASN' but with no requirement for a personal licence holder	X		

**Consultation Question 22:**

**What other issues or options do you think should be considered when taking forward proposals for a lighter touch authorisation? (please specify in the box below keeping your views to a maximum of 200 words)**

As described at Questions 18 and 19, Alcohol Focus Scotland would strongly disagree with proposals for lighter touch authorisation. It is critical that evidence-based measures are implemented to begin to reduce the historically high levels of alcohol harm which are being experienced across the UK. A joint brief produced in 2011 by the World Economic Forum and the World Health Organisation concluded that the three 'best buys' available to governments in terms of alcohol policy to reduce harm, were action to reduce the affordability, the availability and the marketing of alcohol. Further, the AMPHORA project, a 5 year pan-European project which analysed effective alcohol policy, concluded in 2012 that evidence to reduce the availability of alcohol in a whole variety of ways was compelling, commenting:

"When alcohol becomes easier to get, more alcohol is consumed and more harm results; when alcohol becomes more difficult to get, less is consumed and less harm results. So, reducing the number of alcohol outlets, and the days and hours of alcohol sales, saves lives."

The evidence for the need to tighten regulation is clear and the benefits of the reduced alcohol consumption on the health and well-being of society should take precedent over reducing the perceived burden on business in relation to applying for a licence.

**Consultation Question 23:**

**Do you agree that licensing authorities should have the power to allow organisers of community events involving licensable activities to notify them through a locally determined notification process? (Please select one option)**

Yes	No <input checked="" type="checkbox"/>	Don't know
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**Consultation Question 24:**

**What impact do you think a locally determined notification would have on organisers of community events? (Please select one option in each row)**

		Yes	No	Don't know
A	Reduce the burden		<input checked="" type="checkbox"/>	
B	Increase the burden	<input checked="" type="checkbox"/>		

**Consultation Question 25:**

**Should the number of TENs which can be given in respect of individual premises be increased? (Please select one option)**

Yes	No <input checked="" type="checkbox"/>	Don't know
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**Consultation Question 26:**

<b>If yes, please select one option to indicate which you would prefer:</b>	
15	n/a
18	n/a
Don't know	n/a

<b>Consultation Question 27:</b> <b>Do you think that licensing authorities should have local discretion around late night refreshment in each of the following ways? (Please select one option in each row)</b>				
		Yes	No	Don't know
A	Determining that premises in certain areas are exempt		X	
B	Determining that certain areas are exempt in their local area		X	

<b>Consultation Question 28:</b> <b>Do you agree that motorway service areas should receive a nationally prescribed exemption from regulations for the provision of late night refreshment? (Please select one option)</b>				
		Yes	No	Don't know
A	Motorway services should receive a nationally prescribed exemption from regulations for the provision of late night refreshment	X		

<b>Consultation Question 29:</b> <b>Please describe any other types of premises to which you think a nationally prescribed exemption should apply (keeping your views to a maximum of 100 words)</b>	
None	

<b>Consultation Question 30:</b> <b>Do you agree with each of the following proposals? (Please select one option in each row)</b>				
		Yes	No	Don't know
A	Remove the requirements to advertise licensing applications in local newspapers		X	
B	Remove the centrally imposed prohibition on the sale of alcohol at MSA's for the on and off trade		X	
C	Remove the centrally imposed prohibition on the sale of alcohol at MSA's but only in respect of overnight accommodation – "lodges"		X	
D	Remove or simplify requirements to renew personal licences under the 2003 Act		X	

**Consultation Question 31:**

**Do you think that each of the following would reduce the overall burdens on business? (Please select one option in each row)**

		Yes	No	Don't know
A	Remove the requirements to advertise licensing applications in local newspapers			<b>X</b>
B	Remove the centrally imposed prohibition on the sale of alcohol at MSA's for the on and off trade		<b>X</b>	
C	Remove the centrally imposed prohibition on the sale of alcohol at MSA's but only in respect of overnight accommodation – "lodges"		<b>X</b>	
D	Remove or simplify requirements to renew personal licences under the 2003 Act		<b>X</b>	

**Consultation Question 32:**

**Do you think that the following measures would impact adversely on one or more of the licensing objectives? (Please select one option in each row)**

		Yes	No	Don't know
A	Remove the requirements to advertise licensing applications in local newspapers	<b>X</b>		
B	Remove the centrally imposed prohibition on the sale of alcohol at MSA's for the on and off trade	<b>X</b>		
C	Remove the centrally imposed prohibition on the sale of alcohol at MSA's but only in respect of overnight accommodation – "lodges"	<b>X</b>		
D	Remove or simplify requirements to renew personal licences under the 2003 Act	<b>X</b>		

**Consultation Question 33:**

**In addition to the suggestions outlined above, what other sections of or processes under the 2003 Act could in your view be removed or simplified in order to impact favourably on businesses without undermining the statutory licensing objectives or significantly increasing burdens on licensing authorities? (Please specify in the box below keeping your views to a maximum of 200 words)**

There are no processes that could be removed or simplified without having an adverse effect on the licensing objectives or increasing the burden on responsible authorities or the local community.

**Consultation Question 34:**

**Do you think that the Impact Assessments related to the consultation provide an accurate representation of the costs and benefits of the proposals? (Please select one option in each row)**

		Yes	No	Don't know
A	Minimum unit pricing	X		
B	Multi-buy promotions			
C	Health as an objective for cumulative impact			
D	Ancillary sales of alcohol			
E	Temporary Event Notices			
F	Late night refreshment			
G	Removing the duty to advertise licensing applications in local newspapers			
H	Sales of alcohol at motorway service stations			
I	Personal licences			

**Consultation Question 35:**

**Do you have any comments on the methodologies or assumptions used in the impact assessments? If so please detail them, referencing clearly the impact assessment and page to which you refer.**

Yes X	No	Don't know
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If yes please specify in the box below, referencing clearly the impact assessment and page to which you refer (keeping your views to a maximum of 400 words).

**Impact Assessment: A Minimum Unit Price for Alcohol**

**Ref p10:** We are concerned that new methodology has been applied to work out the benefits delivered by a MUP at 45p. While we accept that the methodology should be updated to take account of inflation, no comparison has been provided for a MUP set at alternative levels such as 50p.

There is also no rationale as to why the figure of 45p has been chosen. In its report on the Government's Alcohol Strategy the House of Commons Health Committee (2012) states that: "If the minimum unit price in England were to be fixed at a different level to that in Scotland, we would expect the evidence supporting that decision to be set out clearly."

**Impact Assessment: Health as an objective for cumulative impact**

**Ref p7:** In principle public health as an objective should be ranked alongside the other four licensing objectives and not tied to CIPs. We do not accept the rationale for the link made in the impact assessment. It is not disproportionate for the industry to promote sensible drinking and low and non-alcoholic drinks.

**Impact Assessment: Ancillary sellers**

**Ref p1, 2, 3:** We are concerned that the potential benefits to business are insufficient to run the risk of increased alcohol-related health harms, a risk also highlighted in the document.

**Ref p6:** We are concerned that the section on "Minimal" sales is highly ambiguous and provides no reassurance that loopholes would not be created. Local decisions by licensing authorities are likely to be subject to legal challenge, an expensive process for local authorities, especially given the current economic climate.

**Ref p8:** The document estimates that up to 9,116 new alcohol sales venues could be created after three years, a significant increase in the availability of alcohol. This figure is partly based on the take up of licenses by 'community premises'. While the figure has been increased from 4% to 6%, we believe that increase may be insufficient given the profit motive behind businesses which is not so present for community premises.