

# **Response to Alcohol Strategy Consultation West Midlands Fire Service**

## **Consultation Question 1:**

**Do you agree that this MUP level would achieve these aims?**

WMFS supports the principle of a minimum unit price (MUP) and recognising the finding of the Sheffield Study (2008), feel that the level of 50p would be more effective in reducing alcohol consumption and thus reducing alcohol related anti-social behaviour (nuisance fires and secondary fires) and the number of Accidental Dwelling Fires (ADF) where alcohol & / or drugs are a factor.

WMFS believes that the MUP will have an impact on consumer awareness potentially reduce the number of ADF's where alcohol / drugs are a factor, the number of hospital admissions as well as some of the burden on the public purse.

## **Consultation Question 2:**

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

**Yes**

It is important to take into account the impact it will have on the most at risk and vulnerable groups, such as young binge drinkers, underage drinkers and harmful drinkers, together with the findings from the University of Sheffield (updated January 2012) on a model based on the population of Scotland. The findings identified that a price increase will largely affect harmful and hazardous drinkers more so than the moderate drinkers, who will have minimal affect.

## **Consultation 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 adjusted each year automatically in line with inflation.

## **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 there are any other people, organisations or groups that could be particularly affected by the minimum unit price of alcohol?**

The research by Sheffield University (2008) identified that the pricing policy would have an immediate impact on health, society and economy - especially reducing workplace absences and violent crime.

WMFS is anxious that the reduced availability of low cost alcohol may see an increase in other substance misuse. This could result in huge health and community safety issues, especially if there is an increase in the combined use of drugs and alcohol.

There will be an impact on retailers, mainly supermarkets and outlets that rely on cut-price sales as well the danger of an increase in counterfeit alcohol.

Between 01/04/09 – 31/12/12, WMFS attended 636 Accidental Dwelling Fires where alcohol/ drugs were a factor, but not necessarily the cause. Over the same period, there were 11 fatalities and 199 injuries were sustained.

**Consultation Question 5:**

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

WMFS would be supportive of a ban if it can be shown there is substantial evidence that purchase via a multi-buy promotion does increase overall consumption, however WMFS is not aware of such evidence.

Considerations should be given to other methods of discounting, which may deem a ban as ineffective in reducing consumption amongst the key groups.

**Consultation Question 6:**

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

See answer to Qu 5 above

**Consultation Question 7:**

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

See answer to Qu 5 above

**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 there are other groups that could be particularly affected by a ban on multi-buy promotions?**

**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 – see glossary)?**

WMFS does not have a view on particular mandatory licensing conditions but are supportive of any measure that reduces the negative impact of alcohol consumption especially with regard to community safety, anti-social behaviour and unintended injury

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

**Consultation Question 10:**

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

WMFS does not have a view on particular mandatory licensing conditions but are supportive of any measure that reduces the negative impact of alcohol consumption especially with regard to community safety, anti-social behaviour and unintended injury

**Consultation Question 11:**

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

WMFS does not have a view on particular mandatory licensing conditions but are supportive of any measure that reduces the negative impact of alcohol consumption especially with regard to community safety, anti-social behaviour and unintended injury

**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?**

WMFS does not have a view on particular mandatory licensing conditions but are supportive of any measure that reduces the negative impact of alcohol consumption especially with regard to community safety, anti-social behaviour and unintended injury

**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?**

Health based data is useful but is not without problems, such as geographical links to demographics and point of sale. Also, if the data is contained to a specific location / small geographical area, would it be an accurate representation of actual scale of the problems being addressed by wider public services.

The CIPs would need to be reflective of commonly agreed geographical boundaries and should include data such as

- Alcohol related dwelling fires – incidences , deaths, injuries, rescues
- hospital admissions,
- age variants,
- alcohol related medical conditions,
- alcohol related ASB, and crime
- domestic abuse
- GP referrals etc

Considered at the highest strategic level, embedding it into economic development and planning.

**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?**

Yes – CIPs should reflect alcohol related health harms, especially as the health impacts of alcohol consumption is not confined to a single locality and need to echo the issues across the population. Consideration should be given to implementing extra safeguards to the population wide approach.

**Consultation Question 15:**

**What impact do you think allowing consideration of data on alcohol-related health harms when introducing a CIP would have if it were used in your local area?**

WMFS would support in order to be able to link existing community safety and vulnerable people activities with wider health and wellbeing outcomes.

**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 meet certain qualification criteria for limited or incidental sales?**

WMFS does not have a particular view on this issue but are supportive of any measure that reduces the negative impact of alcohol consumption especially with regard to community safety, anti-social behaviour and unintended injury.

		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 (paragraph 9.5)			
B	The provision should be available to all businesses provided they meet certain Qualification criteria to be an Ancillary seller (paragraph 9.6)			
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 a special provision to reduce licensing burdens on ancillary sellers were to include a**

**list of certain types of business, do you think it should apply to the following:**

WMFS does not have a particular view on this issue but are supportive of any measure that reduces the negative impact of alcohol consumption especially with regard to community safety, anti-social behaviour and unintended injury.

		Yes	No	Don't know
A	Accommodation providers, providing alcohol alongside accommodation as part of the contract			
B	Hair and beauty salons, providing alcohol alongside a hair or beauty treatment			
C	Florists, providing alcohol alongside the purchase of flowers			
D	Cultural organisations, such as theatres, cinemas and museums, providing alcohol alongside cultural events as part of the entry ticket			
E	Regular charitable events, providing alcohol as part of the wider occasion			

**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?**

No Comment

**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. Do you think that the qualification criteria proposed in paragraph 9.6 meet this aim?

WMFS does not have a particular view on this issue but are supportive of any measure that reduces the negative impact of alcohol consumption especially with regard to community safety, anti-social behaviour and unintended injury.

**Consultation Question 20:**

**Do you think that these proposals would significantly reduce the burdens on ancillary sellers:**

No Comment

		Yes	No	Don't know
A	Allow premises making ancillary sales to request in their premises license 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 – with no requirement for a personal license holder			

**Consultation Question 21:**

**Do you think that the following proposals would impact adversely on one or more of the licensing objectives:**

No Comment

		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 – with no requirement for a personal license holder			

**Consultation Question 22:**

**What other issues or options do you think should be considered when taking forward proposals for a lighter touch authorisation?**

**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?**

No Comment

**Consultation Question 24:**

**What impact do you think a locally determined notification would have on organisers of community events?**

		Yes	No	Don't know
A	Reduce the burden			
B	Increase the burden			

**Consultation Question 25:**

**Should the number of TENs which can be given in respect of individual premises be increased?**

No Comment

**Consultation Question 26:**

**If yes, please select the option you prefer:**

**Consultation Question 27:**

**Do you think that licensing authorities should have local discretion around late night refreshment in each of the following ways:**

WMFS does not have a particular view on this issue but are supportive of any measure that reduces the negative impact of alcohol consumption especially with regard to community safety, anti-social behaviour and unintended injury.

		Yes	No	Don't know
A	Determining that premises in certain areas are exempt.			
B	Determining that certain premises types are exempt			

	in their local area			
--	---------------------	--	--	--

**Consultation Question 28:**

**Do you agree that motorway service areas should receive a national prescribed exemption from the regulations for the provision of late night refreshment?**

WMFS would encourage any limitation on access to alcohol that could encourage drink driving.

		Yes	No	Don't know
A	Motorway service areas should receive a nationally prescribed exemption from regulations for the provision of late night refreshment	Yes		

**Consultation Question 29:**

**Please describe any other types of premises to which you think a nationally prescribed exemption should apply.**

No Comment

**Consultation Question 30:**

**Do you agree with each of the following proposals:**

WMFS does not have a particular view on this issue but are supportive of any measure that reduces the negative impact of alcohol consumption especially with regard to community safety, anti-social behaviour and unintended injury.

		Yes	No	Don't know
A	Remove requirements to advertise licensing applications in local newspapers	Yes		
B	Remove the centrally			

	imposed prohibition on the sale of alcohol at MSAs for the on and off-trade.			
C	Remove the centrally imposed prohibition on the sale of alcohol at MSAs but only in respect of overnight accommodation – 'lodges'.			
D	Remove or simplify requirements to renew personal licences under the 2003 Act.			

### Consultation Question 31:

#### Do you think that each of the following would reduce the overall burdens on business:

WMFS does not have a particular view on this issue but are supportive of any measure that reduces the negative impact of alcohol consumption especially with regard to community safety, anti-social behaviour and unintended injury.

		Yes	No	Don't know
A	Remove requirements to advertise licensing applications in local newspapers	Yes		
B	Remove the centrally imposed prohibition on the sale of alcohol at MSAs for the on and off-trade.			
C	Remove the centrally			

	imposed prohibition on the sale of alcohol at MSAs but only in respect of overnight accommodation – ‘lodges’.			
D	Remove or simplify requirements to renew personal licences under the 2003 Act.			

**Consultation Question 32:**

**Do you think that the following measures would impact adversely on one or more of the licensing objectives:**

WMFS does not have a particular view on this issue but are supportive of any measure that reduces the negative impact of alcohol consumption especially with regard to community safety, anti-social behaviour and unintended injury.

		Yes	No	Don't know
A	Remove requirements to advertise licensing applications in local newspapers			
B	Remove the centrally imposed prohibition on the sale of alcohol at MSAs for the on and off-trade.	Yes		
C	Remove the centrally imposed prohibition on the sale of alcohol at MSAs but only in respect of overnight accommodation – ‘lodges’.	Yes		
D	Remove or simplify	Yes		

	requirements to renew personal licences under the 2003 Act.			
--	---	--	--	--

**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 increase burdens on licensing authorities?

No Comment

**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:

No Comment

		Yes	No	Don't know
A	MUP			
B	Multi-buy promotions			
C	Health as a licensing objective for cumulative impact			
D	Ancillary sales of alcohol			
E	Temporary event notices			
F	Late night refreshment			
G	Removing the duty to advertise licence applications in a local newspaper			
H	Sales of alcohol at MSA			
I	Personal licences			

**Consultation Question 35:**

**Do you have any comments on the methodologies or assumptions used in the impact assessments:**

Yes	No	Don't know
-----	----	------------