

### **RCPCH response to the consultation on alcohol strategy**

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

Yes. A minimum unit price for alcohol, based on strength, is a targeted and proportionate means to reduce consumption by harmful drinkers. This approach has the largest effects on the cheapest and strongest drinks, therefore hitting the young and heavy drinkers hardest. Because children who are exposed to alcohol encourages drinking at an earlier age and can lead to heavier drinking as an adult, it is important to protect children and young people from easily accessible alcohol.

Research from the University of Sheffield suggests that a MUP of 50p would reduce consumption by 7.3% in each drinker aged 11 to 18, and prevent over 3,000 alcohol-related deaths each year in England.<sup>1</sup> This would have no effect on most drinks served at pubs, bars and restaurants, but would successfully target and protect young drinkers and excessive drinkers by increasing the price of the cheapest and strongest alcohol. Meanwhile, the moderate drinker would only see about a 28p difference in spending per week.

Furthermore, the former CMO Sir Liam Donaldson stated in 2009 that 50p would be the best and most appropriate level for a MUP, comparing to both 40p and 70p and stressing the impacts that 50p would have on reducing death, hospital admissions, crime, sick days and health-related costs.<sup>2</sup>

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

Yes, other factors and evidence should be considered.

An international study has shown that a minimum unit price works. The introduction of minimum unit pricing reduced overall alcohol consumption, particularly of high versus low alcohol content varieties of each beverage type, whilst the value of the alcohol sold increased, and there was a greater effect on off-licence than on-licence sales.<sup>3</sup>

Also, 7 out of 10 16- to 24-year-olds surveyed in 2012 said that both price and the way in which alcohol is promoted encourages excessive consumption, as it is often cheaper to buy a 3-litre bottle of cider than a ticket to the cinema. This supports evidence that alcohol

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<sup>1</sup> University of Sheffield (2008) "Independent review of the effects of alcohol pricing and promotion"

[http://www.shef.ac.uk/polopoly\\_fs/1.95621!/file/PartB.pdf](http://www.shef.ac.uk/polopoly_fs/1.95621!/file/PartB.pdf)

<sup>2</sup> Department of Health (2009) "CMO Annual Report 2008"

[http://www.dh.gov.uk/prod\\_consum\\_dh/groups/dh\\_digitalassets/documents/digitalasset/dh\\_096231.pdf](http://www.dh.gov.uk/prod_consum_dh/groups/dh_digitalassets/documents/digitalasset/dh_096231.pdf)

<sup>3</sup> Stockwell T., Zhao J., Giesbrecht N. et al. (2012) "The raising of minimum alcohol prices in Saskatchewan, Canada: impacts on consumption and implications for public health", *American Journal of Public Health*: 2012, 102(12) pp. e103–e110 [http://findings.org.uk/docs/Stockwell\\_T\\_14\\_findings.pdf](http://findings.org.uk/docs/Stockwell_T_14_findings.pdf)

today is 44% more affordable, in relative terms, than in 1980 (reflecting a 25% increase in off-licences).<sup>4</sup>

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

Do nothing – the minimum unit price should not be adjusted.	
The minimum unit price should be automatically updated in line with inflation each year.	
<b>The minimum unit price should be reviewed after a set period.</b>	The minimum price should reflect inflation and any changes in the market, but review of this may not need to be as frequently as once each year.
Don't know.	

### 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, there are various groups and individuals who may be affected by a MUP for alcohol. Besides the harmful and hazardous drinkers whose drinking is affected by the minimum unit price, the most significant group to see change is children and young people. Alcohol Concern has said that a recent survey shows that approximately half of those aged 11 to 15 have already tried alcohol, and that the amount consumed by those who drink by this age has doubled since 1990. It is clear from this and the abovementioned research that the increased number of off-licences and lack of such price controls is contributing to the large numbers of underage drinkers.

In 2007-08, it was found that underage alcohol-related hospital admissions, A&E attendances and ambulance service call outs cost health services almost £19 million, showing that under-18 alcohol-related hospital admissions increased by nearly 1/3 between 2002 and 2007. It was then estimated that in 2009, ambulances responded to over 16,300 alcohol-related call-outs.<sup>5</sup> This shows that a reduction in consumption, from the introduction of a MUP, would drastically reduce costs to the NHS and other health services, as well as make communities safer.

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

Yes.

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

In addition to multi-buy promotions, it might be useful to consider bans on vouchers or other selling promotions for alcohol.

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

<sup>4</sup> Alcohol Concern (2012) "Cheaper to get drunk than go to the cinema say UK's young people"  
<http://www.alcoholconcern.org.uk/media-centre/press-releases/cheaper-to-get-drunk-than-go-to-the-cinema-say-uks-young-people>

<sup>5</sup> Alcohol Concern (2010) "Right time, right place: Alcohol-harm reduction strategies with children and young people"  
<http://www.alcoholconcern.org.uk/assets/files/Publications/Right%20time%20right%20place%2023%20October%202010.pdf>

Much evidence suggests that minimum unit pricing is only effective when combined with strict regulation and implementation of other factors such as multi-buy promotions. Banning multi-buy promotions is a good step in reducing excessive alcohol consumption. It is important that promotions like this go hand-in-hand with an MUP, that it is not one or the other. Tobacco in the US is a good example of this, as prices did not really reflect the adjustment of a MUP across different states, due to (amongst other things such as free market price fixations and different tax levels between states) the use of promotions.

Any evidence or rationale behind multi-buy promotions versus other promotions should also be considered. It is not clear whether getting rid of one would help if the other is still allowed; at the same time, getting rid of all promotions could have negative effects on the consumer / economy / jobs. However, these promotions frequently go hand-in-hand with other advertising and marketing schemes, which have been proven to affect alcohol consumption in children and young people.

**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. It is likely that children and young people are amongst those who will see the greatest effects of a ban on multi-buy promotions. Exposure to alcohol marketing has been shown to encourage children to drink at an earlier age and in greater quantities than they would without; without different promotions and advertising schemes, children and young people are less likely to consume harmful amounts of alcohol.

Low income drinkers who consume harmful levels of alcohol are also likely to benefit the most from the changes, and will see the greatest reduction in health harms, as poorer areas currently tend to see the most negative effects of harmful drinking in terms of hospital admissions, ambulance calls, etc.

**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)? Please state Yes / No / Don't know**

		Prevention of crime and disorder	Public safety	Prevention of public nuisance	Protection of harm from 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	Yes	Yes	Yes	Yes
D.	Age verification policy	Yes	Yes	Yes	Yes
E.	Mandatory provision of small measures	Yes	Yes	Yes	Yes

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

**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 - see glossary) which could be tackled through a mandatory licensing condition?**

Yes. In terms of the protection of children from harm, it is extremely important that underage drinking is prevented. Both on- and off-licences should ensure that the proper identification is provided at the purchase of alcohol, and that age restrictions are strictly adhered to and enforced. The allowance of clubs to admit underage individuals under the premise that they will not drink should also be stopped, or with strict regulations and enforcement put into place, to deter underage drinking.

**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?**

The off-trade conditions should not be diminished; rather, on-trade conditions could be added to the existing off-trade ones, as more could be done to prevent irresponsible promotions similar to multi-buy promotions in pubs and clubs.

**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?**

Data from the Public Health Observatories (Public Health England Knowledge Networks) could be used to consider health in CIP. The RCPCH welcomes CIP that considers health evidence, especially regarding this policy.

**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?**

**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 provide evidence to support your response.**

Evidence shows that multi-buy promotions contribute to an increase in the amount of alcohol bought and consumed by young people, with further studies suggesting that the more easily and readily available alcohol is, the greater the amount of alcohol-related harm. Implementing both a MUP and ban on multi-buys would help reduce excessive consumption. Overall, a decrease in consumption would lead to a reduction of alcohol-related incidents (injuries, accidents, etc.) and crime.

**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?**

		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 (see paragraph 9.5).	X		

B	The provision should be available to all businesses providing they meet certain qualification criteria to be an ancillary seller (see paragraph 9.6).	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		

**17. If 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?**

		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	Florists, providing alcohol alongside the purchase of flowers.		X	
D	Cultural organisations, such as theatres, cinemas and museums, providing alcohol alongside cultural events as part of the entry ticket.		X	
E	Regular charitable events, providing alcohol as part of the wider occasion.		X	

**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?**

**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?**

Yes. However, if the proposal is left very general, it may be open to interpretation and subjectivity. The definition of a 'small part or proportion of a sale transaction or contract for a wider service' should be considered.

**20. Do you think that these proposals would significantly reduce the burdens on ancillary sellers?**

		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 licence holder.			

**21. Do you think that the following proposals would impact adversely on one or more of the licensing objectives (see glossary)?**

		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 – with no requirement for a personal licence holder.	X		

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

**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.

**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		X	
B	Increase the burden	X		

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

No.

**26.If yes, please select one option to indicate which you would prefer: 15, 18, Don't know**

N/A

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

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

B	Determining that certain premises types are exempt in their local area.		X	
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**28. Do you agree that motorway service areas should receive a nationally prescribed exemption from regulations for the provision of late night refreshment?**

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

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

**30. Do you agree with each of the following proposals?**

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

**31. Do you think that each of the following would reduce the overall burdens on business?**

	Yes	No	Don't know
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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.			
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.			

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

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

**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?**

**34. Do you think that the Impact Assessments related to the consultation provide an accurate representation of the costs and benefits of the proposals?**

		Yes	No	Don't know
A	Minimum unit pricing.	X		
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 motorway service stations.			
I	Personal licences.			

**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.**