

# Public Health (Minimum Price for Alcohol) (Wales) Bill



Response from The Salvation Army to the Welsh Government's Health and Sports Committee's call for a response on the Public Health (Minimum Price for Alcohol) (Wales) Bill

11 December 2017

## Introduction

The Salvation Army has worked with women and men with problematic substance use since it was founded in the nineteenth-century - and we continue to do so today, offering aftercare and rehabilitation services, psycho-social support, education and training amongst other things. It is in our day-to-day work that we witness first-hand the devastating effect drugs and alcohol dependency can have on individuals, as well as their friends and families.

For this reason we welcome the introduction of this Bill and would like to reiterate our support for a policy of minimum unit pricing (MUP), making the following points:

### 1. The advantages of establishing a minimum alcohol sales price based on a unit of alcohol

There are multiple advantages of introducing MUP, not least as a means of reducing the social harm associated with excessive drinking. Indeed, as a recent study by Sheffield University<sup>1</sup> has highlighted:

- There is a link between the price and availability of alcohol and societal problems: namely, that as alcohol becomes more affordable the number of alcohol-related deaths and hospital admissions increases;
- The number of alcohol-related hospital admissions and deaths increases as levels of social deprivation rise.

We would also add that, as well as coming at a significant financial and human cost, harmful drinking has a further impact on other areas, such as levels of crime and family trauma.

Much to our concern, further studies have cited examples of alcohol being available for as little as 14p per unit and that two cans of 'own brand' lager can be purchased for less than the price of branded Cola.<sup>2</sup> An appropriately set minimum unit price will effectively remove 'cheap' alcohol from the market, which tends to be purchased by harmful drinkers (including young, underage drinkers), with evidence suggesting that the alcohol consumption of the heaviest drinkers will also be affected by price.<sup>3</sup> This research, along with other academic studies, shows that a policy of MUP could not be more warranted.

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<sup>1</sup> Model-based Appraisal of the comparative impact of Minimum Unit pricing and taxing policies in Wales: Interim report - an update to the 50p MUP example (Cardiff: Welsh Government 2017)

<sup>2</sup> *The Four Steps to Alcohol Misuse*, Alcohol Focus Scotland, Scotland Health Action on Alcohol Problems, Balance, the North East Alcohol Office and Our Life (November 2011)

<sup>3</sup> Model-based Appraisal of the comparative impact of Minimum Unit pricing and taxing policies in Wales

## **2. The disadvantages of establishing a minimum alcohol sales price based on a unit of alcohol**

It has been argued previously that MUP would be against European legislation and that, if passed into law, such a policy will be challenged by the alcohol industry and result in protracted legal battles. However, as the Scottish example has recently shown, such rulings can be overcome - paving the way for the Welsh Government to push on with addressing the practice of selling low cost alcohol and tackling alcohol-related problems.

It has also been postulated that MUP will adversely impact the poorest communities in Wales. The Sheffield University study confirms this will indeed be the case (especially for those drinking harmfully and hazardously).<sup>4</sup> However, through our work with those who are most marginalised and excluded from society, we also know that it is these groups who are most disproportionately affected by alcohol misuse. Indeed, the same study goes on to explain that, according to the Welsh Index of Deprivation (WIMD), those from the most deprived communities are much more likely to be admitted to hospital, or die, as a result of harmful drinking than their better off counterparts. We therefore welcome any intervention that makes a significant difference to the health of a population group which has been difficult to engage in recent years and who, with the introduction of MUP, would have the most health benefits to gain.

## **3. The level at which such a proposed minimum price should be set and the justification for that level.**

This is a matter for experts to decide; however it is important that the minimum price set is sufficiently high so as to have an impact on purchasing behaviour. Research by Sheffield University has produced a convincing model measuring the potential impact of MUP on a variety of population groups. The findings indicate that:

- Setting a level of 50p per unit would result in a significant reduction in alcohol-related harms, whilst ensuring alcohol remains affordable for moderate drinkers;
- Alcohol consumption would be reduced across all population groups, with the most significant reduction noticed amongst harmful drinkers from the most deprived areas (a relative change of -25.6%)<sup>5</sup>

Alongside the obvious public health benefits for our population, there would also likely be a significant reduction in alcohol-fuelled crime and disorder, thus improving the safety of our communities. We therefore support a starting position of 50p per unit and would recommend that the MUP is set by secondary legislation, in order that Ministers are able to vary the price as circumstances change.

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<sup>4</sup> Model-based Appraisal of the comparative impact of Minimum Unit pricing and taxing policies in Wales

<sup>5</sup> Ibid

#### 4. The rationale behind the use of minimum pricing as an effective tool.

There is a significant body of research on the relationship between the price of alcohol and consumption levels. In one such piece of research the authors concluded:

*“...price affects drinking of all types of beverages, and across the population of drinkers from light drinkers to heavy drinkers. We know of no other preventive intervention to reduce drinking that has the numbers of studies and consistency of effects seen in the literature on alcohol taxes and prices”.*<sup>6</sup>

Further evidence suggests that consumers of alcohol increase their drinking when prices are low, and decrease their consumption when prices rise.<sup>7</sup> Therefore, public health can be protected and improved with the introduction of such a policy lever. This Bill presents a window of opportunity to do just that.

## Conclusion

The introduction of MUP would have untold benefits for both our society and economy. Whilst we accept that the introduction of MUP will not, in itself, resolve Wales’ alcohol-related problems, it is at least a step in the right direction. We see MUP as part of *a range of measures* aimed at improving the health and wellbeing of the Welsh people. And so we will continue to challenge the Welsh Government to invest in social programmes, to support families and create attitudinal change, which will together encourage positive choices about the role of alcohol in our lives.

The problem of alcohol misuse is not unique to Wales. It is a global issue. It is, therefore, positive to see the Welsh Government in the vanguard of countries that are developing innovative national policies to address this seemingly intractable problem. Addressing the price and availability of alcohol through legislation are consistently recognised as effective, public health interventions and we would encourage others to similarly follow suit.

We welcome the opportunity to feed into this consultation and look forward to engaging with further discussions on this matter.

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<sup>6</sup> Wagenaar, AC, Salios, MJ, Komoro, KA, 'Effects of beverage alcohol price and tax levels on drinking: a meta-analysis of 1003 estimates from 112 studies, *Addiction*, 104, 179-190, society for the study of addiction' (2009)

<sup>7</sup> Barbor, T.F., Caetano, R., Casswell, S., Edwards, G., Giesbrecht, N., Graham, K., Grube, J., Grunewald, P., Hill, L., Holder, H., Homel, R., Osterberg, E., Rehm, J., Room, R., & Rossow, I. 'Alcohol: No Ordinary Commodity – Research and Public Policy' (Oxford and London; Oxford University Press, 2003)

