

MPA 23

Bil Iechyd y Cyhoedd (Isafbris am Alcohol) (Cymru)
Public Health (Minimum Price for Alcohol) (Wales) Bill
Ymateb gan Sefydliad Iechyd y Geg
Response from Oral Health Foundation



**Oral Health Foundation Response to the Health, Social Care and Sport Committee's consultation
on the Public Health (Minimum Price for Alcohol) (Wales) Bill**

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About the Oral Health Foundation

The Oral Health Foundation is the leading national charity working to improve oral health. Our goal is to improve people's lives by reducing the harm caused by oral diseases – many of which are entirely preventable. Established more than 45 years ago, we continue to provide expert, independent and impartial advice on all aspects of oral health to those who need it most. We work closely with Government, dental and health professionals, manufacturers, the dental trade, national and local agencies and the public, to achieve our mission of addressing the inequalities which exist in oral health, changing people's lives for the better.

The Oral Health Foundation welcomes the opportunity to respond to the Health, Social Care and Sport Committee's consultation on the Public Health (Minimum Price for Alcohol) (Wales) Bill. Our comments on the general principles, barriers to implementation and any unintended consequences of the Bill are answered below.

Answers to questions:

1) Comment on the general principles of the Bill and the extent to which it will contribute to improving and protecting the health and well-being of the population of Wales

- The Oral Health Foundation welcomes and supports this legislation. We have long supported Minimum Unit Pricing (MUP) for alcohol.
- MUP is one of the most effective and cost-effective measures to reduce alcohol-related harm and it will improve and protect the health and well-being of the population of Wales significantly.
- Introducing this measure at this time is especially important, given the recent announcement from the Welsh government that alcohol related deaths in Wales increased by 9% in 2016 compared with 2015¹.
- The latest statistics from Wales show that between 2013-2015 there were 2,766 people in Wales diagnosed with oral cancer². Alcohol is classified as a leading cause of oral cancer. An estimated 30% of oral cancers are linked to excessive alcohol consumption³. The Oral Health Foundation believes that the introduction of MUP for alcohol would ultimately reduce excessive consumption and have a direct impact on the number of oral cancer cases presented in Wales.
- Excessive alcohol consumption also impacts on oral health in several ways. Drinking hazardously is not only a risk factor for sustaining oro-facial injuries, either through falls, road traffic accidents or violence, but alcohol and lifestyles closely associated with alcohol misuse can also have detrimental effects on the dentition: dental erosion, dental caries and periodontal disease.

¹ Welsh government (14 November 2017), 'Increase in alcohol-related deaths in Wales – new report shows'. Available at <http://gov.wales/newsroom/health-and-social-services/2017/item/?lang=en>

² Public Health Wales, Cancer Incidence in Wales: Dashboard & Data. Available at <http://www.wcisu.wales.nhs.uk/dashboard-data>

³ Parkin DM. Cancers attributable to consumption of alcohol in the UK in 2010. Br J Cancer 2011; 105 (S2):S14-S18).

The Oral Health Foundation firmly believe tackling alcohol misuse will be greatly beneficial to the population of Wales.

- Committee members will be aware of the work Sheffield University has done on behalf of the Welsh government to estimate the impact of MUP in Wales on population health. This work is referenced in the Explanatory Memorandum for the Bill. To summarise some of the Sheffield team's key findings, once the full effects of the policy are in place, MUP in Wales is estimated to lead to:

- 53 fewer deaths a year
- 1,400 fewer hospital admissions a year
- £131 million a year saved in healthcare costs
- £882 million in savings to society overall each year

At the same time, reductions in drinking will predominantly occur amongst high-risk drinkers, with moderate drinkers barely noticing the difference. According to Sheffield University's analysis, under a 50p MUP, moderate drinkers will spend just £2.37 a year more on alcohol, and consume just 6.4 fewer units a year⁴

2) Comment on any potential barriers to the implementation of the provisions and whether the Bill takes account of them

- We would draw attention to the fact that there will be costs associated with the enforcement of the Act by local authorities, at a time when local authorities are under tight financial pressures
- The Welsh government will need to ensure that local authorities have sufficient funds and support in order to carry out their enforcement work
- The implementation of MUP should include a mechanism to ensure any windfall gained is re-invested into additional public health work

3) Comment on whether there are any unintended consequences arising from the Bill

- One consequence of MUP, though not necessarily an unintended one, is that more people may seek help from substance misuse services. An increase in demand could place existing services under further pressure, and it is crucial that this is considered. Treatment services should be funded adequately to meet this demand

A number of negative consequences of the Bill have been suggested, and we summarise these below, and give our thoughts on each

- Concern has been expressed that MUP could lead to increases in dependent drinkers committing crime in order to consume alcohol, or that dependent drinkers may choose to consume harmful alcohol substitutes such as methylated spirits in order to become intoxicated

⁴ Sheffield University (2014), Model-based appraisal of minimum unit pricing for alcohol in Wales. Available at <http://gov.wales/docs/caecd/research/2014/141208-model-based-appraisal-minimum-unit-price-alcohol-en.pdf>

A study of dependent drinkers' behaviour following an increase in the price of alcohol found that these effects were very uncommon.⁵ A review of the negative impacts of MUP has concluded that, 'unintended negative consequences from MUP are minor in comparison with the substantial health, social and economic benefits the policy creates'⁶

- Another criticism of MUP has been that it has a disproportionately negative impact on those from low-income households

Whilst the impact of MUP on high-income drinkers is likely to be less than that felt by low-income drinkers, moderate drinkers at all income levels will barely notice the difference in costs, and we believe the health benefits of MUP outweigh this concern. Those from the lowest incomes stand to benefit the most from MUP, with an estimated 8 out of 10 lives saved coming from the lowest income groups,⁷ and of all price-related alcohol policies, MUP reduces health inequalities the most⁸

- Another concern is that MUP may lead to increased profits for some alcohol producers and retailers in the off-trade, due to the increased prices of the cheapest products. Increased profits could then be spent on activity (e.g. alcohol marketing) which are linked with alcohol harm

We believe that, on balance, the large benefits of MUP in terms of people's health significantly outweigh this potential consequence

- Concern has also been expressed that MUP would negatively affect pubs

Assuming the MUP is set at 50p, pub prices will be left unchanged. For example, with a 50p MUP, a pint of average strength beer could not be sold for less than around £1, but this is well below the cost of average beer prices.

MUP could actually be of benefit for pubs, as it would increase the low prices of supermarket alcohol which have led more people to drink at home rather than in pubs

⁵ Falkner, C. et al (2016), The effect of alcohol price on dependent drinkers' alcohol consumption, *New Zealand Medical Journal* 128: 1427, pp9-17.

⁶ Stockwell, T. & Thomas, G. (2013), Is alcohol too cheap in the UK? The case for setting a Minimum Unit price for alcohol. London: Institute of Alcohol Studies.

⁷ Holmes, J., et al. (2014) '[Effects of minimum unit pricing for alcohol on different income and socioeconomic groups: a modelling study](#)', *The Lancet*, 383 (9929), 1655-64.

⁸ Meier, P. M., et al., 2016. *Estimated Effects of Different Alcohol Taxation and Price Policies on Health Inequalities: A Mathematical Modelling Study*. PLOS One. Vol: 13 Iss: 2.