



## **Alcohol Concern’s written evidence to the Health, Social Care and Sport Committee of the National Assembly for Wales on the Public Health (Minimum Price for Alcohol) (Wales) Bill**

### **General principles**

**1.0** Alcohol Concern strongly supports the principles of the Public Health (Minimum Price for Alcohol) (Wales) Bill. Despite a small decline in alcohol consumption in the UK over the last few years,<sup>1</sup> more needs to be done to reduce the avoidable harms resulting from alcohol misuse. Managing the price of alcohol is an important component of that work.

**1.1** A review of international evidence, published by Bangor and Glyndŵr Universities in 2011 came to the following very clear conclusion: “Within the international literature on reducing alcohol consumption and the harm related to alcohol, the finding with the strongest evidence base is that consumption of alcohol is highly sensitive to changes in price (or, to be more accurate, affordability). When the price of alcohol drops, more is consumed; when alcohol becomes more expensive, less is consumed. This effect is seen across the entire population that drinks alcohol”.<sup>2</sup>

**1.2** Historically, taxation has been the method used in the UK to adjust the price of alcohol. However:

- The duty system for alcohol in the UK is loaded with historical anomalies and does not relate closely to the alcoholic strength of drinks.<sup>3</sup> For example, even after the recent Budget announcement on cider duty comes into force in 2019, the duty on all ciders from 1.3% to 6.8% ABV will be the same<sup>4</sup>

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<sup>1</sup> British Beer and Pub Association (2017) *Statistical handbook 2017*, London, BBPA.

<sup>2</sup> Bailey, J. et al. (2011) *Achieving positive change in the drinking culture of Wales*, Wrexham, Glyndŵr University.

<sup>3</sup> op. cit. British Beer and Pub Association.

<sup>4</sup> HM Treasury (2017) *Autumn Budget 2017: duty on high strength ciders*, London, HM Treasury, online, available at:

- Research has shown that after rises in alcohol duty, some supermarkets pass more of the duty increases on to mid-range and top-end products, in order to keep their cheapest alcohol prices down;<sup>5</sup> and some drinks producers have said quite openly that they absorb some duty increases so as not to raise their prices for consumers.<sup>6</sup>

**1.3** A form of baseline price for alcohol in England and Wales was established in 2014 when the then Chancellor introduced legislation banning the sale of alcohol below the combined cost of excise duty and VAT. This was intended to prevent “businesses from selling alcohol at heavily discounted prices” and thereby reduce “excessive alcohol consumption and its associated impact on alcohol-related crime and health harms.”<sup>7</sup> However, the total of VAT and duty is a very low threshold, and it has been found that less than 1% of alcoholic drinks on sale have been affected by this measure.<sup>8</sup> Researchers have concluded that it has had “almost no impact on population consumption, spending and alcohol-related harms”.<sup>9</sup>

**1.4** Minimum unit pricing (MUP) is a more effective, fairer and more targeted method of regulating the price of alcohol, in that it correlates directly with the amount of pure alcohol (ethanol) in any container or serving of a drink, regardless of what type of drink it is (beer, cider, wine, spirit or mixed) and regardless of where it is sold (in a pub, club, restaurant or shop). By setting a baseline price below which a unit of alcohol (10ml of ethanol) cannot be sold, MUP will have the greatest impact on drinks sold at the lowest prices relative to their alcoholic strength – drinks which tend to be favoured by the heaviest drinkers.<sup>10, 11</sup> This will be most obvious in the case of white ciders, for which there is little or no demand apart from that from people who are dependent on alcohol.<sup>12, 13</sup> Conversely, MUP would have a minimal financial impact on people drinking moderately (within the UK Chief Medical Officers’ guidelines), for whom there would be a projected average increase in the cost of drinking of a few pounds per year (or a few pence per week).<sup>14</sup> As such, MUP very much

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[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/661438/duty\\_on\\_high\\_street\\_ciders.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/661438/duty_on_high_street_ciders.pdf) [accessed 22 November 2017].

<sup>5</sup> Ally, A. K. et al. (2014) *Alcohol tax pass-through across the product and price range: do retailers treat cheap alcohol differently?*, *Addiction*, 109(12), pp1994-2002.

<sup>6</sup> Turney, E. (2010) *Magners absorbs cider duty hike*, *Morning Advertiser*, 26 March 2010.

<sup>7</sup> Home Office (March 2017) *Guidance on banning the sale of alcohol below the cost of duty plus VAT*, London, Home Office.

<sup>8</sup> Brennan, A. et al. (2014) *Potential benefits of minimum unit pricing for alcohol versus a ban on below cost selling in England 2014: modelling study*, *BMJ*, September 2014.

<sup>9</sup> Meng Y. et al. (2014) *Model-based appraisal of minimum unit pricing for alcohol in Wales: An adaptation of the Sheffield Alcohol Policy Model version 3*, Sheffield: SCHARR, University of Sheffield.

<sup>10</sup> Alcohol Concern (2015) *Alcohol brands consumed by young people in treatment 2015*, London, Alcohol Concern, 2015.

<sup>11</sup> Holmes, J. et al. (2014) *Effects of minimum unit pricing for alcohol on different income and socioeconomic groups: a modelling study*, *The Lancet*, 10 February 2014.

<sup>12</sup> Goodall, A. (2011) *White cider and street drinkers: recommendations to reduce harm*, London, Alcohol Concern.

<sup>13</sup> Chick, J. et al. (2016) *Alcohol pricing and purchasing among heavy drinkers in Edinburgh and Glasgow*, London, Alcohol Research UK.

<sup>14</sup> op. cit. Meng Y. et al.

accords with the Prudent Healthcare principles of doing only what is needed, no more, no less; and of reducing inappropriate variations in health outcomes using evidence-based practice.<sup>15</sup>

**1.5** MUP could also not be side-stepped by alcohol retailers in the way that the 2010 Scottish ban on multiple purchase discounts (such as three bottles for the price of two) has been, with “the industry appearing to have responded to the ban by replacing multi-buy with simple price reduction [on individual items].”<sup>16</sup>

## Unintended consequences

**2.0** Given that Wales and Scotland will be the first territories in the world to introduce MUP based solely on the alcoholic strength of drinks, there may be unforeseen or unintended consequences, as with any new policy or initiative. Alcohol Concern therefore advocates robust evaluation of the implementation of MUP in Wales and its effects (as will also be happening in Scotland as part of Monitoring and Evaluating Scotland’s Alcohol Strategy).<sup>17</sup> In both territories, this will provide a unique opportunity to carefully observe the impacts of MUP in a real-world environment. Similarly, the inclusion of a ‘sunset clause’ will mean that, should the anticipated reductions in harm not manifest within an agreed period, then the measure could be adjusted or reversed.

We have examined some of possible consequences of MUP below.

## Will MUP undermine local pubs?

**2.1** The impact of MUP will be felt almost entirely in the off-trade (off-licences and supermarkets) rather than the on-trade (pubs, clubs and restaurants). Field research by Alcohol Concern in Wales in October and November 2017 found many products on sale in shops well below the probable MUP threshold of 50p per unit. These included:

- 70cl of vodka or gin for £10.00: 38p per unit
- 70cl of fortified wine for £2.99: 27p per unit
- 3 litres of strong cider for £3.99: 18p per unit.<sup>18</sup>

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<sup>15</sup> Welsh Government (2015) *Prudent healthcare – setting out the prudent principles*, online, available at: <http://www.prudenthealthcare.org.uk/principles/> [accessed 16 November 2017].

<sup>16</sup> University of Cambridge press release (2013), *New study reveals that the ban on alcohol multi-buy promotions in Scotland did not reduce the amount of alcohol purchased*, online, available at: <http://www.cam.ac.uk/research/news/new-study-reveals-that-the-ban-on-alcohol-multi-buy-promotions-in-scotland-did-not-reduce-the-amount> [accessed 29 November 2017].

<sup>17</sup> See: <http://www.healthscotland.scot/health-topics/alcohol/monitoring-and-evaluating-scotlands-alcohol-strategy> [accessed 17 November 2017].

<sup>18</sup> Full survey findings available on request from Alcohol Concern Cymru.

Conversely, when we surveyed the price per unit of popular drinks sold in pubs and bars,<sup>19</sup> the cheapest drink we found was cider at 98p per unit, nearly twice the proposed 50p per unit threshold. The average prices we found for cider, lager and red wine in pubs were £1.36 per unit, £1.43 per unit and £1.53 per unit respectively.<sup>20</sup>

**2.2** Many publicans believe that MUP could be advantageous to them by redressing to some extent the price disparity between the on- and off-trades. An Alcohol Concern survey of publicans in Wales in 2012 found that 77% supported a 50p MUP, and that 94% believed that cheap alcohol in supermarkets and off-licences was damaging their trade.<sup>21</sup> More recently, UK-wide research has found that 83% of publicans believe supermarket alcohol is too cheap, and 73% think increasing its price should be a priority for politicians in tackling alcohol problems.<sup>22</sup> In 2010, the Rural Development Sub-Committee of the National Assembly concluded that “the availability of cheap alcohol in supermarkets...undermines those smaller producers seeking to develop and sell quality products, as well as threatening the future of community pubs”.<sup>23</sup>

## **Incentivising reductions in the alcoholic strength of drinks**

**2.3** One unintended but welcome consequence of MUP may be that it creates an incentive for producers to innovate by offering a greater range of less alcoholic drinks or by lowering the strength of some current brands, thereby providing more options for consumers who wish to moderate their consumption. A similar effect was observed following the 50% reduction in 2011 in the duty on beers of 2.8% ABV or less.<sup>24</sup> Within a year, sales of these products had reportedly risen by more than 40% nationwide.<sup>25</sup>

**2.4** To illustrate this possible impact of MUP on the strength of drinks: wine typically has an alcohol content of around 12% to 13%, meaning that a standard bottle contains 9 to 10 units of alcohol. If we take the example of a 12.5% Sauvignon Blanc currently on sale in a popular supermarket for £3.89,<sup>26</sup> this contains just over 9 units per bottle, and with a 50p

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<sup>19</sup> The drinks surveyed were Strongbow or Magners cider at 4.8% ABV, Heineken or San Miguel lager at 5% ABV, and Merlot wine at 12.5% to 13.5%.

<sup>20</sup> Full survey findings available on request from Alcohol Concern Cymru.

<sup>21</sup> Alcohol Concern (2012) *Minimum unit pricing and the pub*, Cardiff, Alcohol Concern.

<sup>22</sup> Institute of Alcohol Studies (2017) *Pubs quizzed: What publicans think about policy, public health and the changing trade*, London, IAS.

<sup>23</sup> National Assembly for Wales Rural Development Sub-Committee (2010) *The wine, beer, cider and spirits industries*, Cardiff, National Assembly for Wales.

<sup>24</sup> Leicester, A. (2011) *Alcohol pricing and taxation policies*. IFS Briefing Note BN124, London, Institute of Fiscal Studies.

<sup>25</sup> Roberts, G. (2012) *Low-alcohol beers show their true calibre*, The Independent on Sunday, 18 March 2012 online, available at: <http://www.independent.co.uk/life-style/food-and-drink/news/low-alcohol-beers-show-their-true-calibre-7576435.html> [accessed 17 November 2017].

<sup>26</sup> See: <https://www.lidl.co.uk/en/White-Wine-3659.htm?articleId=1384> [accessed 17 November 2017].

per unit MUP could not be sold for less than £4.69. However, by reducing the alcoholic strength from 12.5% to 10%, the unit content would be reduced to 7½ units and the minimum price at 50p per unit would therefore be £3.75, i.e. less than its current price. Given the incremental increase in the alcoholic strengths of wines over the past 10 to 20 years, this may be a very welcome development.<sup>27</sup> The Scottish Government has already suggested of its own MUP measure that “it is possible that its introduction will incentivise producers to produce lower strength alcohol products as these would retail more cheaply”.<sup>28</sup>

## **Cross-border alcohol shopping**

**2.5** It is sometimes suggested that MUP in Wales will push consumers who live close to the border with England to purchase their alcohol there. Cross-border food and drink shopping already occurs, of course, where it is more convenient for consumers; but any additional or particular cross-border alcohol shopping will depend on people’s willingness and ability to travel, and the price differential compared to the costs of transport. With regards to their own MUP measure, the Scottish Government has concluded that “for most Scots, purchasing in England would incur both a time and travel cost...likely to outweigh any savings on the price of alcohol”.<sup>29</sup> Similarly, in instances where shoppers have travelled from the Republic of Ireland to Northern Ireland to take advantage of cheaper alcohol, it has been found that the motivation was cheaper groceries overall, not alcohol in particular.<sup>30</sup> (The comparison with Northern Ireland is probably the most relevant here, since, like Wales, it is a relatively small country with a relatively long border with the adjoining territory; the border between Scotland and England is comparatively short and quite some distance from Scotland’s major centres of population).

**2.6** In 2011, researchers at Bangor and Glyndŵr Universities reviewed international evidence on cross-border alcohol purchases in various territories and concluded that “overall, the evidence on availability does not uniformly suggest that reducing availability in one area simply leads to people travelling to less restrictive areas” and that “a significant proportion of the population choose to drink less rather than to travel to purchase alcohol”.<sup>31</sup> Research by Cardiff and Swansea Universities in 2016 found a strong link

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<sup>27</sup> Alston, J.M. et al. (2011) *Too much of a good thing? Causes and consequences of increases in sugar content of California wine grapes*, Journal of Wine Economics, Vol. 6, No. 2, Autumn 2011.

<sup>28</sup> Scottish Government (2012) *Final business and regulatory impact assessment for minimum price per unit of alcohol as contained in Alcohol (Minimum Pricing) (Scotland) Bill*, Edinburgh, Scottish Government.

<sup>29</sup> *ibid.*

<sup>30</sup> *ibid.*

<sup>31</sup> *op. cit.* Bailey, J. et al.

between people's alcohol consumption habits and the distance to their nearest alcohol outlet, suggesting a reluctance to travel more than a few minutes to purchase alcohol.<sup>32</sup>

**2.7** References are sometimes made to the Sunday Closing (Wales) Act 1881, which kept pubs in some parts of Wales closed on Sundays until 1991. Although the attempts to evade this measure have entered into folklore – what one Archbishop of Wales memorably described as the “Sunday trek across the English border for drinking purposes”<sup>33</sup> – the vast majority of evasion of this Act involved use of the loophole allowing drinking on private premises, rather than travelling to purchase alcohol.<sup>34</sup>

## **Cross-border online sales**

**2.8** The Explanatory Memorandum to the Bill states that “online and mobile businesses licensed in Wales will need to ensure they are charging in line with the MUP when supplying to customers in Wales” but that “online and mobile businesses licensed in England will not be covered by the legislation when supplying to customers in England or Wales”.<sup>35</sup> However, it is worth noting that the Home Office's 2015 guidance on the Licensing Act 2003 states that, legally, a sale of alcohol takes place at the point at which the alcohol is “appropriated to the contract (i.e. the place where it is identified and specifically set apart for delivery to the purchaser)” rather than the place where payment is made.<sup>36</sup> This means that even if a Welsh customer purchases alcohol at below the MUP via an internet server outside Wales (as many retailers' servers will be) that order could not be packed and dispatched from any supermarket or warehouse in Wales.

**2.9** When the Scottish Government introduced a ban in 2010 on multiple-purchase discounts, Tesco announced that they would side-step the measure by using distribution centres in England.<sup>37</sup> However, it is not clear to what extent this actually happens, and no other retailers appear to have followed suit. Both Tesco and Sainsbury's operate their online service from the local shops, and in the case of Tesco this is what allows them to offer same-day delivery to 98% of UK addresses.<sup>38, 39</sup> Shifting from this distribution model in order to circumvent MUP in Wales would incur substantial extra costs, and seems unlikely to occur.

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<sup>32</sup> Fone, D. et al. (2016) *Change in alcohol outlet density and alcohol-related harm to population health (CHALICE): a comprehensive record-linked database study in Wales*, Public Health Research 4(3),1.10.3310/phr04030

<sup>33</sup> Morris A.E. (1961) *The Christian use of alcoholic beverages*, Risca, Starling Press.

<sup>34</sup> Alcohol Concern (2010) *A drinking nation? Wales and alcohol*, Cardiff, Alcohol Concern.

<sup>35</sup> Welsh Government (2015) *Draft Public Health (Minimum Price for Alcohol (Wales) Bill): Explanatory Memorandum incorporating the Regulatory Impact Assessment and Explanatory Notes*, Cardiff, Welsh Government.

<sup>36</sup> Home Office (2017) *Revised guidance issued under section 182 of the Licensing Act*, London, Home Office.

<sup>37</sup> BBC Scotland Online (2011) *Online loopholes in Scottish alcohol bill*, online, available at: <http://www.bbc.co.uk/news/uk-scotland-15123533> [accessed 17 November 2017].

<sup>38</sup> Withers, I. (2017) *Tesco launches same day delivery across the UK*, Daily Telegraph, 24 July 2017.

<sup>39</sup> See: <https://www.tesco.com/wine/help/default.aspx?name=deliveryoptions> [accessed 1 December 2017]

## Home brewing

**2.10** Although home brewing has been mentioned as a possible means to evade MUP,<sup>40</sup> it is unlikely to become anything other than the minority pursuit it currently is,<sup>41</sup> given the time, expense and effort it involves. Our own research indicates that the cheapest home brewing ingredients would allow the production of 40 pints of beer at a price of around 13p per unit (around ¼ of the likely MUP) but an that initial capital investment of around £48 is needed for equipment (taking the cost of the first batch to 66p per unit) and each batch of beer will take 3 to 4 weeks to be drinkable.<sup>42</sup>

## Illicit alcohol sales

**2.11** The extent and importance of illicit (untaxed) alcohol sales in the UK has been emphasised by some sections of the alcohol industry, although there appear to be some commercial motivations behind this. The Wine and Spirit Trade Association (WSTA) highlight illicit sales in the context of campaigning for reducing the excise duty on their members' products, claiming that current duty rates "create an incentive for duty fraud".<sup>43</sup> Although the British Beer and Pub Association (BBPA) state that "the problem [of illicit alcohol] is being overestimated", they also blame any illicit sales that are occurring on "the huge, and growing discrepancy in rates of beer duty between the UK and neighbouring countries",<sup>44</sup> again as part of a broader campaign for duty reductions for their members.<sup>45</sup>

**2.12** On the specific question of MUP, the Scottish Government has said that it does not consider its proposed 50p baseline price is likely to incentivise illicit sales.<sup>46</sup> Even if MUP could be said to provide such an incentive, it is worth remembering that the fact a particular criminal activity is rendered attractive by the costs of producing and selling a product via legitimate channels is not generally regarded as a reason in itself for decriminalising that activity. HMRC, the UK Border Force and other agencies have an extensive range of sanctions they can apply to penalise those involved in the transport and sale of illicit alcohol, including seizure of goods and substantial fines; and since April 2017 it has been an offence for a retailer to buy alcohol from an unapproved source.<sup>47</sup>

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<sup>40</sup> McDonald, L. (2010) *Price-fixing is the wrong way to tackle binge drinking*, IEA blog, 13 August 2010, online, available at: <https://iea.org.uk/blog/price-fixing-is-the-wrong-way-to-tackle-binge-drinking> [accessed 21 November 2017].

<sup>41</sup> According to one 2014 estimate, "up to 14,000" people in the UK "dip their toe in occasionally" into the hobby, i.e. around 25 in every 10,000 adult drinkers. See: Lee, A. (2014) *Small beer...big business*, Daily Express, 7 July 2014.

<sup>42</sup> Information from the Wilko and Love Brewing websites [accessed 17 November 2017].

<sup>43</sup> See: <http://www.wsta.co.uk/what-we-do/policy?id=256> [accessed 17 November 2017].

<sup>44</sup> See: <http://www.beerandpub.com/dutyfraud> [accessed 17 November 2017].

<sup>45</sup> See: <http://www.beerandpub.com/campaigns/pub-jobs> [accessed 22 November 2017].

<sup>46</sup> op. cit. Scottish Government.

<sup>47</sup> HM Revenue & Customs (2016) *The HMRC alcohol strategy: modernising alcohol taxes to tackle fraud and*

## Increasing supermarket profits at the expense of consumers

**2.13** Given that MUP will drive up the price of some drinks (as it is intended to do), one possible consequence could be that it produces a ‘windfall’ of additional revenue for retailers. However, any such increase is questionable given the tendency of alcohol price increases to drive down sales.<sup>48</sup> It is also worth asking why the major supermarkets, as represented by the British Retail Consortium, have been so persistent in their opposition to MUP if they thought it could be commercially advantageous to them.<sup>49</sup> Should that opposition prove to have been misplaced from a business point of view, with off-trade retail revenues growing as a result of MUP, a portion of this new revenue would be taken by HM Treasury in the form of VAT and excise duty, as at present,<sup>50</sup> and we would advocate a dialogue between the Welsh Government and HM Treasury as to how these new monies might be redirected to provide assistance to those affected by alcohol problems.

## Increasing the cost of bulk alcohol purchases

**2.14** As noted, above MUP will have the greatest impact on the drinks sold at the lowest prices relative to their alcoholic strength, for a number of which there is little or no demand apart aside from amongst alcohol-dependent drinkers.<sup>51, 52</sup> Alcohol Concern’s own research in Wales indicates that there will be less impact on the prices of the drinks brands favoured by most consumers, most of which are sold above the likely MUP of 50p per unit, or only slightly below it.<sup>53</sup> However, MUP is likely to have an impact when such brands are made available with bulk-purchase discounts (‘multi-buy’ deals). For example:

- We found Isla Negra Merlot on sale in Tesco in November 2017 for £5.00 a bottle, or 53p per unit. However, taking advantage of an offer of 25% off when buying 6 or more bottles took the price down to 40p per unit<sup>54</sup>
- Similarly, Captain Morgan Spiced Rum was on sale in Morrisons at £17 for 70cl, or 69p per unit. The offer of 2 bottles for £22 took the price down to 45p per unit.<sup>55</sup>

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*reduce burdens on alcohol businesses*, London, HMRC.

<sup>48</sup> op. cit. Bailey, J. et al.

<sup>49</sup> Talking Retail (2009) *Retailers slam minimum pricing*, Talking Retail, 30 September 2009, online available at: <https://www.talkingretail.com/news/industry-news/retailers-slam-minimum-pricing-30-09-2009/> [accessed 21 November 2017].

<sup>50</sup> See: <https://www.gov.uk/government/publications/alcohol-duty-rate-changes/alcohol-duty-rate-changes> [accessed 17 November 2017].

<sup>51</sup> op cit. Goodall, A.

<sup>52</sup> op cit. Chick, J. et al.

<sup>53</sup> Full survey findings available on request from Alcohol Concern Cymru.

<sup>54</sup> See: <https://www.tesco.com/groceries/en-GB/products/252954913> [accessed 20 November 2017].

<sup>55</sup> See: [https://groceries.morrisons.com/webshop/product/Captain-Morgans-Spiced-Rum/119524011?from=offer\\_details&param=1003264065&parentContainer=PROMO](https://groceries.morrisons.com/webshop/product/Captain-Morgans-Spiced-Rum/119524011?from=offer_details&param=1003264065&parentContainer=PROMO) [accessed 20 November 2017].



**2.15** The British Retail Consortium has previously stated that large purchases of alcohol sold at a discount by supermarkets are “for enjoying at home with family and friends over a long period”,<sup>56</sup> although they have not so far been able to provide any evidence for this. There is some evidence from other sectors that multiple purchase discounts encourage consumers to make one single large purchase instead of a series of smaller ones. However, such discounts are also routinely used to entice customers to buy more than they initially intended.<sup>57</sup> One Australian study found that consumers who took advantage of point-of-sale alcohol promotions purchased a greater quantity of alcohol than those who did not, and that 40% of customers who took advantage of such promotions said that they had bought a specific quantity of alcohol because of the promotion.<sup>58</sup> Similarly, research undertaken for HMRC in 2013 found that “promotions on less expensive wine and less expensive beer tend to lead to an increase in the total units [of alcohol] purchased” and that “for spirits, the application of individual promotions always led to an increase in the total units purchased”.<sup>59</sup>

**2.16** Given what we know about the importance of ease of availability and convenience in people’s drinking habits, it follows that having a larger stock of alcohol already bought and stored at home is likely to lead to higher consumption. As one participant in research by Greenwich University in 2009 put it, “You can relax more at home...You can just go and get yourself a drink. You sit down and you are pretty much there for the rest of the night.”<sup>60</sup>

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<sup>56</sup> British Retail Consortium (2014) *Policies and issues: food – alcohol*, online, available at: [http://www.brc.org.uk/brc\\_policy\\_content.asp?iCat=46&iSubCat=654&spolicy=Food&sSubPolicy=Alcohol](http://www.brc.org.uk/brc_policy_content.asp?iCat=46&iSubCat=654&spolicy=Food&sSubPolicy=Alcohol) [accessed 20 August 2014].

<sup>57</sup> Mohammed, R. (2013) *When it’s wise to offer volume discounts*, Harvard Business Review, 25 October 2013.

<sup>58</sup> Jones S.C. et al. (2015) *The influence of price-related point-of-sale promotions on bottle shop purchases of young adults*, Drug and Alcohol Review, 2015;34(2):170–6, cited in Public Health England (2016) *The public health burden of alcohol and the effectiveness and cost-effectiveness of alcohol control policies: An evidence review*, London, Public Health England.

<sup>59</sup> Rohr, C. et al. (2013) *Consumers’ responsiveness to alcohol multi-buy sales promotions: results from a stated preference choice experiment*, London, HMRC.

<sup>60</sup> Foster, J. (2009) *Why do people drink at home? An exploration of the perceptions of adult home consumption practices*, London, Greenwich University.

## Impacts on dependent drinkers

**2.17** Legitimate concerns have been expressed about the possible effects of MUP on alcohol-dependent drinkers; for example, that it could drive them to steal alcohol (or steal in order to buy alcohol), to consume other potentially dangerous alcohols (such as methanol), or to substitute other substances for alcohol.

**2.18** It is worth clarifying to start with some of the confusion of terms that has grown up in the public discourse around MUP, in which various supposed types of drinkers have been conflated. Terms such as ‘hardened drinkers’, ‘addicts’, ‘alcoholics’, and ‘binge drinkers’ are used largely interchangeably to refer to people whom the observer believes have little or no wish or ability to control their drinking. In reality, these terms encompass a range of people who may consume very different amounts of alcohol, over different periods of time, and for very different reasons; and who may have varying degrees of control over their drinking behaviour.

**2.19** Alcohol-dependent drinkers are in some senses a distinct group, in that they are people who have become physiologically dependent on alcohol as a result of long-term heavy use. They need to regularly consume alcohol in order to avoid physical withdrawal symptoms (which can occasionally cause death), and they should not stop drinking altogether without a medically supervised detox. The number of dependent drinkers in the population is estimated to be 1.4% of adults, or around 36,000 people in Wales.<sup>61</sup>

**2.20** It is possible for dependent drinkers to reduce their alcohol intake, and the experience of alcohol treatment services is that dependent drinkers do adjust their consumption according to supply,<sup>62</sup> but this is only true up to a point. We would therefore argue strongly that in order to be effective, and to avoid potentially dangerous consequences for dependent drinkers, MUP must be accompanied by adequate treatment services to enable people to exit a life of destructive drinking. This should include assertive outreach to engage with the most chaotic drinkers who may not show obvious motivation to drink less.<sup>63</sup> For drinkers who are not physiologically alcohol-dependent, reducing consumption is, perhaps, more straightforward, but we should never underestimate the difficulties faced by those seeking to change their ingrained drinking habits; and again, we will need to ensure that adequate support services are in place.

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<sup>61</sup> Pryce, R. et al. (2017) *Estimates of alcohol dependence in England based on APMS 2014, including estimates of children living in a household with an adult with alcohol dependence: prevalence, trends, and amenability to treatment*, Sheffield, University of Sheffield.

<sup>62</sup> Sherwood Forest Hospitals NHS Trust (2012) *Alcohol: how to reduce your intake safely*, Sutton in Ashfield, Sherwood Forest Hospitals NHS Trust.

<sup>63</sup> Ward, M. and Holmes, M. (2014) *Alcohol Concern’s Blue Light project: working with change-resistant drinkers*, London, Alcohol Concern.

**2.21** The availability of alternative substances to alcohol for alcohol misusers cannot be ignored. The UK Government has recently noted that new psychoactive substances (NPS) “continue to appear rapidly on the market” and that “use among certain groups is problematic, particularly among the homeless population and in prisons”, two populations in which alcohol misuse is also often a serious issue.<sup>64</sup> The Scottish Government has already expressed its intention to commission research into any possible displacement or substitution effects of MUP, including any increase in the use of illicit substances.<sup>65</sup>

**2.22** At present, the question of whether alcohol-dependent drinkers will turn to other substances, or to criminal behaviour in order to obtain alcohol, is as yet unanswered. Encouragingly, a recent analysis of patients with serious alcohol problems at two hospitals in Edinburgh found that whilst “cheapness was quoted commonly as a reason for beverage choice...stealing alcohol or drinking alcohol substitutes was only very rarely reported”. The researchers concluded that fears of such behaviour “may fit a caricature of the alcoholic” but that “a considerable shift in self-concept of this population would have to occur for substantial numbers to fulfil that stereotype”.<sup>66</sup> Similarly, a study in New Zealand of 115 dependent drinkers found that only 2 participants mentioned non-beverage alcohol (such as methylated spirits) as something they had actually consumed, and stealing alcohol was used as a strategy by just 9 people. The research team concluded that “as has been shown in other literature, there is minimal evidence in this group of accessing non-beverage alcohol or of criminal activity to access alcohol when it becomes unaffordable” and that “fears of such behaviours are not valid reasons for rejecting a minimum pricing regime”.<sup>67</sup>

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*Alcohol Concern is a trading name of Alcohol Research UK, registered charity no. 1140287, company no. 7462605.*

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<sup>64</sup> Home Office (2017) *2017 Drug strategy*, London, Home Office.

<sup>65</sup> op. cit. Scottish Government.

<sup>66</sup> Black, H., et al. (2011) *The price of a drink: levels of consumption and price paid per unit of alcohol by Edinburgh’s ill drinkers with a comparison to wider alcohol sales in Scotland*, *Addiction*, 106(4), 729-736.

<sup>67</sup> Faulkner, C. et al. (2015) *The effect of alcohol price on dependent drinkers’ alcohol consumption*, *New Zealand Medical Journal*, 18 December 2015, 128(1427):9-17.