

MPA 27

Bil Iechyd y Cyhoedd (Isafbris am Alcohol) (Cymru)

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

Ymateb gan John Holloway

Response from John Holloway

Public Health (Minimum Price for Alcohol) Wales Bill - Explanatory Memorandum

Comments and observations by John Holloway, [REDACTED], [REDACTED], [REDACTED]

EMail: [REDACTED]

Case Studies

In paragraph 275 it states the Average extra costs will be £2.37 per annum for moderate drinkers and £32 per annum for Moderate drinkers.

I thought I would test this against my own and my mothers consumption, we are both moderate drinkers and always have been so here are two case studies.

John

Drinkers a can of beer (Fosters 440ml 4% Alcohol 1.8units) a day (with his evening meal), he buys this in packs of 20 usual price £14 per pack, maybe less than this on the run up to rugby days and Bank holidays. (Current price £11 per pack in Asda Cwmbach)

These packs will now increase to £18. $£14 / 20 \text{ cans} = 70\text{p a can now}$, MUP price ($1.8 * 0.50\text{p}$) 90p. So each day John will have to pay an extra £0.20p a day £1.40 a week and **a staggering £72.80 per annum.**

Johns Mum (aged 85)

Has a small glass of Sherry before dinner she drinks Asda own brand Pale Sherry and buys one litre every 3 weeks from this she gets 20 glasses (50ml each) the bottle is 17.5 units so her consumption is 5.8 units a week well below the government guideline of 14 units

The bottle now costs her £7.15 with MUP this will rise to £8.75 an extra 53p a week **or £27 a year.**

This figures are massively at variance with the figures in paragraph 279, as neither of us are "in poverty" the prediction is we incur an extra cost of £2.44 each per annum.

I've thought about this long and hard perhaps we are atypical but I don't think my local Asda has allocated 12 linear metres for large packs of beer just in case I decide to go on a spending spree.

What seems to be missing from the document is any allowance for moderate drinkers, sensibly, taking advantage of cheap deals. In fact there is no explanation of how these extra costs are arrived at.

Measuring The Effectiveness of MuP

The legislation provides for a full? review in 5 years . However certain benefits that related to Acute Alcohol Problems should become evident within a year (or sooner) From the memorandum these are

Violent Acts

Work Absences

Public Disorder

Emergency Hospital Admissions

The Sheffield Model sets out very specific expected reductions in the above area , therefore tracking the expected against the actual should give a very early indication of the effectiveness (or otherwise) of the implementation of MUP . Clearly alcohol abuse is a major problem and if MUP does not deliver as expected then other avenues need to be explored - five years plus time to decide on a new approach is just too long.

I would like to see a full annual report measuring expected against actuals, including problems associated with Chronic Alcohol problems although clearly the effective on this group will take longer to show through.

Extra Income to Retailers

The people of Wales are being forced to donate £0.25 Billion to retailers over 10 years. I find this most unpalatable.

Although not part of this proposal my suggestion is:-

The major retailers are asked to join a scheme where any excess profit created by MUP is donated to respected established charities that deal with problems caused by Alcohol abuse. They would be able to put a sticker on any products saying £x of this purchase will be donated to "Good Causes helping people (and their Families) deal with Alcohol problems ". Plus a table of donations could be published every month.

I would suggest this scheme could be investigated with the aim of introducing it say 12 months after MUP is introduced.

Document Bias / Lack of Investigation

Internet Shopping

Paragraph 238 - bizarre comment these people don't need to buy online when there is no price differential. They don't buy on line NOW but with a substantial price difference this may change. The whole proposal is about changing habits!

The whole process of internet shopping is not discussed in detail in the document - In view of the way this could derail the whole proposal it merits some investigation. I don't claim to be an expert on this subject , but here are my observations.

If you order alcohol from a company with an English address MUP does not apply - that company could have a warehouse in Wales from which it supplies those orders. Additionally local pickup is becoming more prevalent with corner shops serving as distribution outlets for online orders - pick up locally and pay locally.

All you need is an English Address that you notionally order from.

Cross Border Shopping

In the 80s, 90s and early 2000s there was massive cross channel trade South of England / France (mostly Calais) in cheap alcohol - van loads of cheap french booze were imported. In the end, as HRMC were reputedly down £4 billion per annum, a "for personal consumption" only rule was introduced with inspections at the arrival point.

I'm amazed there is no discussion of this in the Memorandum.

The situation in Wales is simpler for the importers as there are no customs posts between England and Wales so load up your van with Frosty Jacks in England and sell on in Wales. Perfectly legal provided you are "shopping for a friend".

Lower Quality Products

Blatant Bias in Paragraph 365:- this mentions a price gap between "Lower Quality products and Higher quality or branded products"

This is an expression of opinion not a fact and is trying to instil the view that lower priced products are inferior (and therefore should be avoided) which is not the case Own branded products are in many cases better or equal to branded products. (a quick search on the internet will support this view).

Responses to Previous Consultation

Bias in Paragraphs 176 to 180

Negative responses are attributed to the "alcohol retail and" there is no such qualification to the positive responses documented in Paragraph 178. *Presumably some from Religious Groups and others that oppose any alcohol consumption?*

Illicit Alcohol

Unsubstantiated Comment in Paragraph 229

Third sentence beginning. "The Welsh Government does not consider..." this is just an opinion accredited to no one in particular, who exactly in "The Welsh Government" is being referred to and where is this opinion documented. In fact the whole paragraph is decidedly woolly - failing to cite any evidence.

Callous Attitude

Paragraph 362 - If it's the only local shop in a village that goes out of business then this could have a serious effect on the community.