

Cytûn (Churches Together in Wales)
Response to the Committee consultation on the Public Health (Minimum Price for Alcohol) (Wales) Bill

1. Introduction

1.1 Cytûn (Churches Together in Wales) brings together the main Christian denominations of Wales, and a number of other Christian organisations, to work together on matters of common concern. The 17 member denominations have around 165,000 adult members in every community across Wales, and regular contact with many more adults, children and young people. A full list of member churches and organisations can be found at:

<http://www.cytun.cymru/us.html>

1.2 We would welcome the opportunity to be involved further in the work of the Committee. Any queries should be directed to the Revd Gethin Rhys, National Assembly Policy Officer for Cytûn, at [REDACTED]. This response may be published in full.

2. The general principles of the Bill

2.1 Christian churches in Wales have a lengthy history of encouraging and supporting legislation designed to limit the irresponsible sale of alcohol, beginning with one of the first Wales-specific pieces of legislation in modern times, the Sunday Closing (Wales) Act 1881. Although some Christians are motivated by a belief in total abstinence from alcohol, most support such measures as ways of curbing irresponsible use, rather than preventing all use, of alcohol.

2.2 While the 1881 Act targeted public houses, in more recent years the Christian churches have established more positive relationships with those who own and run pubs and clubs licensed for alcohol consumption on the premises, notably through the work of Street Pastors, Street Angels and NightLight groups in many parts of Wales, working to reduce the harm caused by excessive alcohol consumption in the night-time economy. These groups are also often involved in their local Community Safety Partnerships. The experience of these groups is that alcohol consumption in on-licensed premises is much less harmful than alcohol bought at off-licensed premises, which is then consumed in the street or on private premises where there is no supervision or support available. The monitoring of customer behaviour by licensees and door staff, and the work of the police in monitoring the premises, as well as the work of CSPs and our own volunteers, have all helped to reduce the harm caused by alcohol consumption in on-licensed premises. Cytûn was pleased to draw on the experience of Street Pastors and similar Christian groups to contribute to the developing of the Welsh Government's Framework for Managing the Night-time Economy in Wales¹ We note that pubs and clubs will be little affected by the new legislation, and welcome the possible effect of displacing some sales from off- to on-licences, and reducing the prevalence of "pre-loading" cheap alcohol before going to a club, meaning that customers may be less likely to arrive already intoxicated.

2.3 Our member church, the Salvation Army, has long supported setting a minimum price for alcohol, and has submitted a separate response to you and provided oral evidence on

¹ <http://gov.wales/topics/people-and-communities/communities/safety/substancemisuse/availability/night/?lang=en>

December 13. Two member churches, the United Reformed Church and the Methodist Church, have submitted a joint response, and the Presbyterian Church of Wales has also responded. All these responses support the general principles of the Bill. This response does not seek to repeat the detailed arguments contained therein.

2.4 Following extensive consultation through the church and society officers of our member churches and organisations, we are not aware of any members of Cytûn who would oppose the principles of this legislation.

2.5 A number of specialist charities founded by or linked to our member churches also support the principles of the Bill. For example, Quaker Action on Alcohol and Drugs, which is closely linked to Cytûn member the Society of Friends in Wales, says:

*The affordability of alcohol has dropped significantly relative to income in the last thirty years, whilst alcohol-related health problems have risen. The Chief Medical Officer, Royal College of Physicians, Alcohol Concern and many health bodies that have united in the Alcohol Health Alliance, have all concluded that a minimum price per unit of alcohol would be one of the most effective ways of reducing harm. We accept this evidence and support minimum unit pricing.*²

3. Potential barriers to the implementation of the provisions and any unintended consequences.

3.1 **Cross-border issues.** It appears to us inevitable that the introduction of a minimum unit price for alcohol in Wales without such a measure being introduced in England will result in some displacement of sales to off-licences on the English side of the border (as the 1881 Act increased the patronage of public houses on the ‘wet’ sides of county borders on Sundays). We note the Welsh Government’s assessment that this effect will be small, as in most cases the cost of reaching such premises will be greater than the saving effected by so doing, but we are aware that some small village shops in villages in Wales very close to the border fear that their sales will reduce and their viability may be threatened. We would certainly regret the loss of such valued small shops in such communities, but hope that the long lead-in time to this legislation, and the possibility of similar legislation following in England, will mean that businesses can plan to diversify their sales to ameliorate any such effects.

3.2 **Internet and postal sales.** While the legislation attempts to cover orders made over the internet and by phone (Explanatory Memorandum para 286), our understanding is that the legislation can only apply where both the supplier and the customer are based in Wales. This is likely to lead to some displacement of sales to suppliers licensed outside Wales, who can then deliver to customers in Wales. Unlike cross-border sales involving additional travel (3.1), there will not necessarily be any additional cost to the Welsh consumer in accessing cheap alcohol through such sources. There will also be some administrative costs to any such businesses which are licensed in Wales in needing to operate two pricing systems, depending on the location of each customer. We are aware that the powers of the National Assembly are limited in this regard, but would encourage the Assembly to use its ingenuity to see if the legislation can be tightened up to cover this issue.

3.3 Some members of our churches have expressed concern that the effect of this measure will be regressive, i.e. poorer drinkers will be affected far more proportionate to their income/wealth than richer drinkers. Churches have consistently been concerned about taxation being regressive (as alcohol duty and VAT are), but we are generally more relaxed about pricing mechanisms being regressive. For example, we support the 5p carrier bag charge and actively promote the Fairtrade movement, which increases prices in order to ensure a fair income for producers. Many of our member churches therefore support the real Living Wage, enabling

² <http://qaad.org/public-issues-alcohol-2/> accessed 13.12.17

its recipients to make informed choices in their purchases rather than always having to buy the cheapest product.

3.4 We note also the counter-argument to that in 3.3 put forward by our member, The Salvation Army, in its written response (section 2):

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, ..., 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.

We note that figures 5 and 6 in the Government's Explanatory Memorandum corroborate this view.

4. The financial implications of the Bill

4.1 We note the view expressed in Part 2 of the Explanatory Memorandum that costs to Welsh Government and costs of enforcement on Local Government will be relatively low. There should be some longer term savings if the harm from alcohol consumption is reduced, although these will be difficult to measure and will be felt in different budgets to the costs.

4.2 We would emphasise that, at a time of financial stringency, every effort should be made not to meet such additional costs as will arise by reducing expenditure on other measures which also mitigate harmful alcohol consumption – e.g. local authorities should not find resources to enforce the new legislation by reducing resource in regulating other licensed premises or by reducing their commitment to Community Safety Partnerships (see para 2.2).

4.3 In line with the oral evidence provided by the Salvation Army on December 13, we would therefore urge continued investment by Welsh Government and local government in public education on the abuse of alcohol and other substances, and regarding the importance of the choices that young people, especially, make. Programmes of rehabilitation for those dependent on alcohol should remain fully accessible regardless of income. Alcohol abuse is related to such fundamentals as poverty and poor education, so strategies like Prosperity for All and the continued observance of the principles of the Well Being Future Generations (Wales) Act will play a vital role in underpinning the objectives of minimum pricing.

5. The appropriateness of the powers in the Bill for Welsh Ministers to make subordinate legislation

5.1 We support the delegation of powers to Welsh Ministers to set the minimum unit price rather than include it on the face of the Bill in order that the effects of inflation, and experience of operating the minimum unit price in Wales and other jurisdictions (notably Scotland), can be taken into account without needing to amend the primary legislation.

5.2 We consider that the other delegated powers are appropriate.

15th December 2017.




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