

MPA 46

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

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

Ymateb gan Eglwys Bresbyteraidd Cymru

Response from Presbyterian Church of Wales

## **Response to the consultation on the Minimum Pricing of Alcohol**

Presbyterian Church of Wales. 15th December 2017

### **Question 1**

We are in favour of the plan to introduce minimum alcohol pricing.

We are also of the opinion that the legislation would help strengthen the present steps that are being taken by the Welsh Government to reduce the consumption of alcohol.

### **Question 2**

We are satisfied that the evidence presented in the Explanatory Memorandum in favour of the aims listed in the question.

### **Question 3**

We agree that setting a minimum price for alcohol for Wales would lessen the strain on the NHS in Wales.

#### Crime

Setting a minimum price for alcohol would be an important step towards further lowering of the annual incidence of crimes believed to be committed under the influence of alcohol, especially violent crimes. In 2014-2015 the Crime Survey for England and Wales reported that victims believed that 47% of violent crimes had been committed under the influence of alcohol.

<http://www.ias.org.uk/Alcohol-knowledge-centre/Crime-and-social-impacts/Factsheets/Alcohol-related-crime-in-the-UK-what-do-we-know.aspx>

Recent evidence from New Zealand shows that people who suffer from Foetal Alcohol Spectrum Disorders are 19 more likely to go to prison for offending.

<http://www.ias.org.uk/What-we-do/Publication-archive/The-Globe/Issue-1-2013/Children-with-Foetal-Alcohol-Spectrum-Disorder-19-times-more-likely-to-end-up-in-prison.aspx>

### **Question 4. Impact Assessment/Equality and Question 5 on Children and Young People**

We believe that introducing a minimum price for alcohol contributes to the Welsh Government's strategy to improve the health and well-being of the following groups, but that not enough attention was given to this in the Impact Assessment by the Welsh Government in the consultation document.

## Marriage, families and children

Alcoholism can lead to marital breakdown and family breakdown. Regarding the effect on families, we would like to see attention given to the effect of alcohol on family breakdown where the parents are still in the care of their parents, but also the effect of alcoholism on the annual number of children in Wales who are taken into the care system, to be adopted or fostered.

There should also be an emphasis on information and policy on the effect of alcohol on domestic violence, in light of the national strategy for preventing domestic violence which is set out in the Violence Against Women, Domestic Abuse and Sexual Violence Act (Wales) 2015.

## Preventing Visual Impairment and Hearing Impairment

Visual Impairment can occur because of Foetal Alcohol Syndrome. This should be noted in the Impact Assessment on people with Visual Impairment, as setting a minimum price for alcohol could lead to fewer cases of FAS. The same is true for Learning Difficulties and Hearing Impairment. For example, this year new evidence from Japan was published showing that Hearing Impairment could be caused by pregnant mothers drinking alcohol.

<https://www.ncbi.nlm.nih.gov/pubmed/15223541>

<https://academic.oup.com/alcalc/advance-article-abstract/doi/10.1093/alcalc/agx092/4626776?redirectedFrom=fulltext>

## Ethnicity and religion

Introducing a minimum price for alcohol would help with regard to improving relations between people of different ethnic and religious backgrounds, as there is evidence that people, especially young people, of ethnic and religious minorities, especially those who practise their religion, are less likely to drink alcohol and drink to excess. At the moment the culture of socialising centred on alcohol excludes very many people of different backgrounds. Here is a survey of the evidence on drinking, ethnicity and religion in the UK (up to 2010).

[http://eprints.mdx.ac.uk/7951/1/Hurcombe-ethnicity-alcohol-literature-review-full\\_0.pdf](http://eprints.mdx.ac.uk/7951/1/Hurcombe-ethnicity-alcohol-literature-review-full_0.pdf)

### **Question 7 (Section 1)**

The formula and example is easy to understand.

### **Question 8 (Section 2)**

We agree that retailers who sell from a shop in Wales for a price lower than the minimum price should be found guilty of committing an offence. We believe that subsections 3 and 4 are fair.

### **Question 9 (Section 3 a 4)**

There aren't other places that need to be listed.

### **Question 10 (Section 5)**

We are of the view that the section covers the transactions sufficiently to ensure that alcohol is not supplied at a price below the Minimum Price for Alcohol.

**Question 11 (Sections 6 a 7)**

These penalties are fair enough.

**Question 12 (Section 8 a 9)**

We are of the view that the provisions in section 8 will ensure the relevant aims are met.

We believe that the minimum price unit should be enforced by local authorities.

Regarding section 8(3)(a) and (b), we agree that an authorised officer is needed. We would like to know what are the Welsh Government's plans for a job description for such an officer. Would the post-holder be working from the field of social work, or also visiting local schools to do work preventing alcohol abuse?

**Question 13 (section 11-13)**

We agree with the suggestion made here.

**Question 14 (section 15 a 16)**

We are of the view that section 15 gives appropriate powers to authorised officers.

We agree with section 16.

**Question 15 – Schedule to the Bill**

We are satisfied with the contents of the Schedule.

**Question 16**

Monitoring the effect of the intended law

We agree with the aim of monitoring the effect of the proposed law through collecting annual data by Public Health Wales and other bodies. We wonder whether it is possible to produce data on the effect of parental alcoholism on children, and on alcoholism among individuals on domestic violence and violence against women.

We would also like to recommend adding annual data on the crimes believed to be caused by the effect of alcohol from Welsh police forces, crime surveys such as the Crime Survey for England and Wales and the Crown Prosecution Service.