

Stockport Clinical Commissioning Group Response to consultation on delivering the Government's policies to cut alcohol fuelled crime and anti-social behaviour: February 2013

Consultation Question 1:		
Do you agree that this MUP level would achieve these aims? (Please select one option):		
Yes ✓	No	Don't know
If you think another level would be preferable, please set out your views on why this might be in the box below (keeping your views to a maximum of 200 words).		
<p>Evidence strongly suggests setting the minimum unit price level at 50p (at 2009 prices. It should be noted that due to inflation since the SchARR (University of Sheffield) model in 2009 (1), this figure is now equivalent to 54p). This would achieve far better outcomes than the proposed 45p price level.</p> <p>The SchARR model - the only UK independently peer reviewed evidence base for minimum unit pricing, found that, after 10 years a 50p price level would save:</p> <ul style="list-style-type: none"> ○ 3,060 lives, 1,020 more than 45p level; ○ 97,700 hospital admissions, 31,500 more than 45p level; ○ 442,300 days absent from work, 176,000 more than 45p level; ○ 42,500 crimes, 18,400 more than 45p price level. <p>These are significant savings of lives, benefits for society and the economy and only cost the moderate drinker 6p per week more than a 45p minimum price level.</p> <p>It should also be noted that all 24 Directors of Public Health across the North West of England support a minimum unit price of at least 50p (2).</p>		
Consultation Question 2:		
Should other factors or evidence be considered when setting a minimum unit price for alcohol? (Please select one option):		
Yes ✓	No	Don't know
If yes, then please specify these in the box below (keeping your views to a maximum of 200 words).		
<ul style="list-style-type: none"> ○ Pubs, bars and other on-trade premises will greatly benefit from a minimum price as it would reduce the differential in prices retailed in the off-trade and on-trade. Evidence suggests that this would result in a shift of drinking patterns to on-trade premises which is a safer, regulated environment to consume alcohol and positive for community pubs. This is important as CAMRA (3) reports that 16 pubs are closing every week. ○ Inflation since the SchARR model was published in 2009 means that 50p is now valued at 54p. Minimum unit pricing's success should be measured against revised levels when this policy is implemented. ○ The Scottish Government is proposing a minimum unit price of 50p creating a potentially serious cross border issues if the price level is 45p in the North West. This may encourage people to visit England to purchase and consume alcohol. ○ The price level should be regularly revised to ensure that alcohol doesn't become more affordable. <p>Additional money earned by retailers should be recouped by the Treasury and directed to local services which reduce alcohol harm.</p>		

Consultation Question 3:		
How do you think the level of minimum unit price set by the Government should be adjusted over time? (Please select one option):		
Do nothing – the minimum unit price should not be adjusted.		
The minimum unit price should be automatically updated in line with inflation each year.		✓
The minimum unit price should be reviewed after a set period.		
Don't know.		
Consultation Question 4:		
The aim of minimum unit pricing is to reduce the consumption of harmful ¹³ and hazardous ¹⁴ drinkers, while minimising the impact on responsible ¹⁵ drinkers. Do you think that there are any other people, organisations or groups that could be particularly affected by a minimum unit price for alcohol? (Please select one option):		
Yes ✓	No	Don't know
If Yes please specify in the box below (keeping your views to a maximum of 100 words).		
<ul style="list-style-type: none"> ○ Children and young people would be better protected from alcohol harms by reducing access to pocket-money priced alcohol. ○ Alcohol would be de-normalised for children, to whom alcohol has become an everyday commodity. ○ Drinkers and non-drinkers would benefit. Alcohol harm costs the North West more than £3billion/year (4). ○ 43% of people in the North West are afraid to enter town centres at night (5) – reduction in harm would reduce crime and the fear of crime. ○ Frontline workers would benefit from less drunken violence (6). ○ There would be a positive effect on offenders - 63% of male offenders are problem drinkers (7). 		
Consultation Question 5:		
Do you think there should be a ban on multi-buy promotions involving alcohol in the off-trade? (Please select one option):		
Yes ✓	No	Don't know
Consultation Question 6:		
Are there any further offers which should be included in a ban on multi-buy promotions? (Please select one option):		
Yes ✓	No	Don't know
If yes, please specify in the box below (keeping your views to a maximum of 100 words).		
<ul style="list-style-type: none"> ○ As a general principle, the purchase of any goods should not be linked to the purchase of alcohol at a lower than normal sale price. ○ Buying goods and getting alcohol discounted or free which would fall below a minimum unit price of 50p. ○ Multi-buy promotions in on-trade premises should end to be consistent with the off-trade. ○ There should be consistency of price per volume of a product regardless of the size or quantity of packaging that alcohol is sold in. ○ Loyalty point schemes and money off coupons which are in anyway linked to alcohol. 		

Consultation Question 7:					
Should other factors or evidence be considered when considering a ban on multi-buy promotions? (Please select one option):					
Yes ✓		No		Don't know	
If yes, please specify in the box below (keeping your views to a maximum of 200 words).					
<ul style="list-style-type: none"> ○ There is a far greater impact of the multi-buy ban policy when enforced alongside a minimum unit price of 50p (at 2009 prices) (1). ○ Marketing of alcohol should be controlled through legislation, ensuring that it does not circumvent the spirit and intention of this legislation. ○ An Alcohol Concern and Balance report of 16-24 year olds (8) found that promotions encouraged more drinking. A multi-buy ban would protect more children and young people. ○ Multi-buy promotions encourage people to buy more alcohol than they intend resulting in easier access to alcohol in the home environment. We already know that children access alcohol from the home more than any other place (9), so a ban would reduce the access to alcohol for children. ○ Trading Standards needs a strengthened operation to monitor and enforce a multi-buy ban effectively as it is unlikely that relying on consumers policing the ban will be effective enough. ○ In a report to Parliament (10), alcohol was named as the most dangerous drug in the UK. Unlike illegal drugs, it is easily accessible and costs as little as 12p/unit (11). ○ Reduced consumption would reduce health inequalities as lower income groups suffer greater health harms (12). 					
Consultation Question 8:					
The aim of a ban on multi-buy promotions is to stop promotions that encourage people to buy more than they otherwise would, helping people to be aware of how much they drink, and to tackle irresponsible alcohol sales. Do you think that there are any other groups that could be particularly affected by a ban on multi-buy promotions? (Please select one option):					
Yes ✓		No		Don't know	
If yes please specify in the box below (keeping your views to a maximum of 100 words).					
<ul style="list-style-type: none"> ○ There should be a consistency in approach, therefore we would not want to differentiate between groups, however: ○ Pubs could benefit as people are less likely to preload on alcohol bought from off-licence premises and shift their consumption of alcohol to on-licence premises. ○ Young people will benefit from reduced access and availability of alcohol in the home environment. ○ Some of these measures may only be effective alongside minimum unit pricing. ○ Public services, such as the NHS, would benefit, as less people would binge drink and preload and result in a lower burden on services (13). 					
Consultation Question 9:					
Do you think each of the mandatory licensing conditions is effective in promoting the licensing objectives (crime prevention / public safety / public nuisance / prevention of harm to children - see glossary)? Please state Yes / No / Don't know in each box:					
		Prevention of crime &	Public safety	Prevention of public	Protection of harm from children

		disorder		nuisance	
A	Irresponsible promotions (see condition 7.3 i)	No	No	No	No
B	Dispensing alcohol directly into the mouth (see condition 7.3 ii)	Yes	Yes	Yes	No
C	Mandatory provision of free tap water (see condition 7.3 iii)	No	No	No	No
D	Age verification policy (see condition 7.3 iv)	No	No	No	No
E	Mandatory provision of small measures (see condition 7.3 v)	No	No	No	No

Consultation Question 10:

Do you think that the mandatory licensing conditions do enough to target irresponsible promotions in pubs and clubs? (Please select one option):

Yes	No ✓	Don't know
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If no, please state what more could be done in the box below (keeping your views to a maximum of 100 words).

- Conditions not clearly defined and are unenforceable. Need redrafting to improve enforceability
- Introduce discretion to develop local definitions of mandatory conditions to improve enforceability
- Remove 'need to demonstrate a link with crime and disorder' clause relating to irresponsible promotions.
- Unit content of all drinks should be clearly visible at the point of sale.
- Age verification schemes should be a minimum 'check 25', have a written policy and include mandatory signage on premises.
- Licensees should train and re-train their staff to be accredited to a national standard for the safe and responsible retailing of alcohol.

Consultation Question 11:

Are there other issues related to the licensing objectives (prevention of crime and disorder / public safety / prevention of public nuisance / protection of children from harm - see glossary) which could be tackled through a mandatory licensing condition? (Please select one option):

Yes ✓	No	Don't know
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If yes, please specify in the box below (keeping your views to a maximum of 200 words).

- A ban on irresponsible drinks promotions should be applied to the off-trade.
- Need to ensure off-trade licensees are held as accountable for the sale of alcohol as on-trade. In many areas there is a direct correlation between hotspots of alcohol related anti-social behaviour and high density of off-licences.
- Restrictions on irresponsible promotions should prohibit heavily discounting of drinks which appeal to young people, such as ready-to-drink 'alcopops' or 'shot' liqueurs.
- A proportionate seating and standing ratio should be introduced, based on the capacity of the premises.
- Soft drinks should be priced cheaper than the cheapest alcoholic drink

- Beer should be decanted from bottles at the bar.
- Loyalty point schemes for the purchase of alcohol should be banned.
- Offering shots of spirits away from the bar area (e.g. table to table selling of shots of pre-poured vodka) should be banned.
- Happy hours and 'ladies nights' (offering discounted or free drinks) should be banned as they encourage excessive alcohol consumption
- Organised commercial pub crawls and drinking games should be banned as they encourage the consumption of excess alcohol in a short space of time which leads to drunkenness and anti-social behaviour (14).

Consultation Question 12:

Do you think the current approach, with five mandatory licensing conditions applying to the on trade and only one of those to the off-trade, is appropriate? (Please select one option):

Yes

No ✓

Don't know

If no, please explain why you think the current approach is not the best approach in the box below (keeping your views to a maximum of 100 words).

There is increasing evidence that pre-loading of alcohol supplied from off sales contributes to problems associated with on sales premises and town and city centres. Mandatory conditions should equally be applicable to off sales where appropriate.

There should be as many or as few mandatory licensing conditions as deemed appropriate by the Government. This should include extending the ban on irresponsible drinks promotions to cover off-trade licensed premises to create a consistency across the on- and off-trades.

Supermarket alcohol sales now account for 70% of off-trade sales (15, 16) and can sell alcohol at discounted prices. Stopping irresponsible promotions would also help to tackle pre-loading and binge drinking of alcohol purchased from the off-trade. People who have pre-loaded are more likely to be a victim or perpetrator of crime (16).

Consultation Question 13:

What sources of evidence on alcohol-related health harm could be used to support the introduction of a cumulative impact policy (CIP) if it were possible for a CIP to include consideration of health? (Please specify in the box below, keeping your views to a maximum of 200 words):

A robust Joint Strategic Needs Assessment would provide consistency in approach, we recommend that it would include:

- Accident and Emergency data
- Ambulance and Paramedic data
- GP/Urgent care/walk in centre data
- Alcohol treatment services data
- Demand/unmet demand for alcohol treatment
- Alcohol related mortality (including suicides and self harm)
- Mental health and wellbeing indices
- Foetal Alcohol Spectrum Disorders data
- Home Office monitoring data on violence
- Trauma and Injury Intelligence Group data from the North West Public Health Observatory
- Other hospital admissions data (NI39): alcohol specific and attributable
- Mapping of licensed premises and correlate alcohol related admissions

- Domestic abuse data, including child protection issues

Public health should be a licensing objective in its own right and not limited to CIPs. This would not be disproportionate, as suggested in the impact assessment, and would play a role in the economic development and health of an authority area. Experience from Scotland suggests that public health should be taken into consideration across the whole authority area rather than at smaller scale when assessing the over-provision of alcohol to take into account all points of sale.

Consultation Question 14:

Do you think any aspects of the current cumulative impact policy process would need to be amended to allow consideration of data on alcohol-related health harms? (Please select one option):

Yes ✓	No	Don't know
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If yes, please specify which aspects in the box below, keeping your views to a maximum of 200 words.

Currently only the police can object to licence applications due to a Cumulative Impact Policies (CIP). We believe that all responsible authorities should be able to object to the application therefore widening the process to consider health data and the impact on health harms. For example if there is a health harm issue but no crime issue, health bodies may object on the grounds of a CIP.

As noted in question 13, public health and assessment of over-provision of alcohol should be considered across the authority area as consideration at ward level could be insufficient and not take into account sales from neighbouring wards.

Consultation Question 15:

What impact do you think allowing consideration of data on alcohol-related health harms when introducing a cumulative impact policy would have if it were used in your local area? Please specify in the box below, keeping your views to a maximum of 200 words. Please provide evidence to support your response.

- By preventing further increases in availability in areas where significant levels of alcohol-related health harm have been identified, CIPs can play an important part within the context of a broader strategy to address alcohol misuse. The World Health Organisation (18) has reported that availability effects levels of harm therefore Licensing Authorities should be able to control the availability of alcohol.
- Where there is over-provision of licensed premises, competition drives down the price of alcohol, which encourages additional consumption. An authority wide over-provision policy backed by public health could lessen 'competition by price' and so reduce consumption by young people in particular, which is an indicator of harm (17).
- In addition to the impact on controlling alcohol related crime and disorder, the health data can be used in other policy areas and licensing objectives, improving the overall data picture. For example, alcohol related assaults may be reported to A&E but not to the police.
- Including health data in consideration of a CIP would enable local links between alcohol and health harm to be better established.

Consultation Question 16:				
Should special provision to reduce the burdens on ancillary sellers be limited to specific types of business, and/or be available to all types of business providing they meet certain qualification criteria for limited or incidental sales? (Please select one option in each row):				
		Yes	No	Don't know
A	The provision should be limited to a specific list of certain types of business and the kinds of sales they make (see paragraph 9.5).		No	
B	The provision should be available to all businesses providing they meet certain qualification criteria to be an ancillary seller (see paragraph 9.6).	Yes		
C	The provision should be available to both a specific list of premises and more widely to organisations meeting the prescribed definition of an ancillary seller, that is, both options A and B.		No	

Consultation Question 17:				
If special provision to reduce licensing burdens on ancillary sellers were to include a list of certain types of business, do you think it should apply to the following? (Please select one option in each row):				
		Yes	No	Don't know
A	Accommodation providers, providing alcohol alongside accommodation as part of the contract.	Yes		
B	Hair and beauty salons, providing alcohol alongside a hair or beauty treatment.	Yes		
C	Florists, providing alcohol alongside the purchase of flowers.	Yes		
D	Cultural organisations, such as theatres, cinemas and museums, providing alcohol alongside cultural events as part of the entry ticket.	Yes		

E	Regular charitable events, providing alcohol as part of the wider occasion. ²³		No	
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Consultation Question 18:

Do you have any suggestions for other types of businesses to which such special provision could apply without impacting adversely on one or more of the licensing objectives (see glossary)? (Please write your suggestions in the box below, keeping your views to a maximum of 200 words):

- We are concerned about the normalisation of alcohol consumption in situations where it would not previously have been expected, such as hairdressers. It should not be treated as an everyday, ordinary product (19). However, if the government does introduce such reduced regulation, including 'charitable events' could provide a major loophole as almost any activity can be undertaken in the name of charity.
- There are no types of premises for alcohol sales which should be completely unregulated. Unregulated alcohol sales would create a situation where the objectives of the Licensing Act 2003 would be unenforceable.
- The licensed sale of alcohol also protects and ensures a standard of 'due diligence' is adhered to by people selling alcohol.
- This proposal would create a third tier of licensed premises and therefore consideration would have to be given to whether these should be included in Early Morning Restriction Orders/Late Night Levy and CIPs. If not there is a risk of confusion for businesses and enforcement officers and consequently increased costs for public sector organisations dealing with the harmful effects of alcohol.

Consultation Question 19:

The aim of a new 'ancillary seller' status is to reduce burdens on businesses where the sale of alcohol is only a small part of their business and occurs alongside the provision of a wider product or service, while minimising loopholes for irresponsible businesses and maintaining the effectiveness of enforcement (see paragraphs 9.2 and 9.3). Do you think that the qualification criteria proposed in paragraph 9.6 meet this aim? (Please select one option):

Yes	No <input checked="" type="checkbox"/>	Don't know
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If no, please describe the changes you would make in the box below (keeping your views to a maximum of 200 words).

- While the proposals would reduce burdens on such businesses, there is a risk that businesses will find loopholes, enabling inappropriate bypassing of licensing requirements, thereby reducing the effectiveness of regulation and enforcement
- Setting a limit on the amount of alcohol that may be supplied, as proposed, could provide an important safeguard, but consideration would have to be given to circumstances, such as whether the alcohol is to be consumed on or off the premises. For example, it may be reasonable for a bottle of wine to be delivered by a florist, but it would not be acceptable to provide a whole bottle for consumption by a customer at a hairdressers.
- It is recognised that premises such as these at present would not normally be a priority for monitoring and enforcement work by licensing officers and police.

Consultation Question 20:				
Do you think that these proposals would significantly reduce the burdens on ancillary sellers? (Please select one option in each row):				
		Yes	No	Don't know
A	Allow premises making ancillary sales to request in their premises licence application that the requirement for a personal licence holder be removed.	Yes		
B	Introduce a new, light-touch form of authorisation for premises making ancillary sales - an 'ASN' but retain the need for a personal licence holder.	Yes		
C	Introduce a new, light touch form of authorisation for premises making ancillary sales – an ASN - with no requirement for a personal licence holder.	Yes		

Consultation Question 21:				
Do you think that the following proposals would impact adversely on one or more of the licensing objectives (see glossary)? (Please select one option in each row):				
		Yes	No	Don't know
A	Allow premises making ancillary sales to request in their premises licence application that the requirement for a personal licence holder be removed.		No	
B	Introduce a new, light-touch form of authorisation for premises making ancillary sales an – 'ASN' but retain the need for a personal licence holder.		No	
C	Introduce a new, light touch form of authorisation for premises making ancillary sales – an ASN – with no requirement for a personal licence holder.		No	

Consultation Question 22: What other issues or options do you think should be considered when taking forward proposals for a lighter touch authorisation? (Please specify in the box below, keeping your views to a maximum of 200 words)?				
<ul style="list-style-type: none"> ○ There should be a facility to review the ancillary seller status and impose more restrictive requirements in respect of problem premises. ○ The 'ancillary sellers' of alcohol should be required to ensure that appropriate training is provided to staff, including for example, under-age sales, customers already intoxicated, drink driving legislation, alcohol units and health effects. 				
Consultation Question 23: Do you agree that licensing authorities should have the power to allow organisers of community events involving licensable activities to notify them through a locally determined notification process? (Please select one option):				
Yes		No ✓		Don't know
This would lead to an additional notification process being for community events and could lead to duplication. It may create inconsistency of approach and confusion, and local authorities would receive more enquiries about what their locally determined process entails				
Consultation Question 24: What impact do you think a locally determined notification would have on organisers of community events? (Please select one option in each row):				
		Yes	No	Don't know
A	Reduce the burden	Yes		
B	Increase the burden		No	
Consultation Question 25: Should the number of TENs which can be given in respect of individual premises be increased? (Please select one option):				
Yes		No ✓		Don't know
No. Current provisions allow for multiple applications. If this number were to be increased a premises could effectively operate throughout the year at weekends using TENs and thereby by-passing existing controls under the Licensing Act.				
Consultation Question 26: If yes, please select one option to indicate which you would prefer:				
15 18 Don't know				
Consultation Question 27: Do you think that licensing authorities should have local discretion around late night refreshment in each of the following ways? (Please select one option in each row):				
		Yes	No	Don't know
A	Determining that premises in certain areas are exempt.		No	
B	Determining that certain premises types are exempt in		No	

	their local area.			
Consultation Question 28:				
Do you agree that motorway service areas should receive a nationally prescribed exemption from regulations for the provision of late night refreshment? (Please select one option):				
		Yes	No	Don't know
A	Motorway service areas should receive a nationally prescribed exemption from regulations for the provision of late night refreshment.		No	
Consultation Question 29:				
Please describe in the box below any other types of premises to which you think a nationally prescribed exemption should apply (keeping your views to a maximum of 100 words):				
Accommodation - if you are serving to a guest of a patron and premises that are just serving hot food and hot drinks (non-alcoholic).				
Consultation Question 30:				
Do you agree with each of the following proposals? (Please select one option in each row):				
		Yes	No	Don't know
A	Remove requirements to advertise licensing applications in local newspapers.		No	
B	Remove the centrally imposed prohibition on the sale of alcohol at MSAs for the on and off-trade.		No	
C	Remove the centrally imposed prohibition on the sale of alcohol at MSAs but only in respect of overnight accommodation – "lodges".	Yes		
D	Remove or simplify requirements to renew personal licences under the 2003 Act.	Yes		
Consultation Question 31:				
Do you think that each of the following would reduce the overall burdens on business? (Please select one option in each row):				
		Yes	No	Don't know
A	Remove requirements to advertise licensing	Yes		

	applications in local newspapers.			
B	Remove the centrally imposed prohibition on the sale of alcohol at MSAs for the on and off-trade.	Yes		
C	Remove the centrally imposed prohibition on the sale of alcohol at MSAs but only in respect of overnight accommodation – “lodges”.	Yes		
D	Remove or simplify requirements to renew personal licences under the 2003 Act.	Yes		

Consultation Question 32:

Do you think that the following measures would impact adversely on one or more of the licensing objectives (see glossary)? (Please select one option in each row):

		Yes	No	Don't know
A	Remove requirements to advertise licensing applications in local newspapers.		No	
B	Remove the centrally imposed prohibition on the sale of alcohol at MSAs for the on and off-trade.	Yes		
C	Remove the centrally imposed prohibition on the sale of alcohol at MSAs but only in respect of overnight accommodation – “lodges”.	Yes		
D	Remove or simplify requirements to renew personal licences under the 2003 Act.		No	

Consultation Question 33:				
In addition to the suggestions outlined above, what other sections of or processes under the 2003 Act could in your view be removed or simplified in order to impact favourably on businesses without undermining the statutory licensing objectives or significantly increasing burdens on licensing authorities? (Please specify in the box below keeping your views to a maximum of 200 words):				
None				
Consultation Question 34:				
Do you think that the Impact Assessments related to the consultation provide an accurate representation of the costs and benefits of the proposals? (Please select one option in each row):				
		Yes	No	Don't know
A	Minimum unit pricing.		No	
B	Multi-buy promotions.			Don't know
C	Health as a licensing objective for cumulative impact.			Don't know
D	Ancillary sales of alcohol.			Don't know
E	Temporary Event Notices.			Don't know
F	Late night refreshment.			Don't know
G	Removing the duty to advertise licence applications in a local newspaper.			Don't know
H	Sales of alcohol at motorway service stations.		No	
I	Personal licenses.			Don't know
Consultation Question 35:				
Do you have any comments on the methodologies or assumptions used in the impact assessments? If so, please detail them, referencing clearly the impact assessment and page to which you refer.				
Yes ✓		No		Don't know
If yes, please specify in the box below, referencing clearly the impact assessment and page to which you refer (keeping your views to a maximum of 400 words).				
We have not seen the methodologies used to support the conclusions for the effectiveness of a 45p minimum unit price in section 5 of the consultation. As this information is not available we have used as evidence the findings of the University of Sheffield's SchARR report (2009) as this				

is the only UK peer reviewed research into the effects of minimum unit pricing.

The cost of alcohol harm to North West England has been calculated to be more than £3 billion (4). These costs are unsustainable. We strongly support setting the minimum unit price level at 50p which would reduce these very high costs to society and public services. The SchARR report modelling has shown a 50p level annually would, after 10 years (1):

- Save 3,060 lives
- Reduction hospital admissions by 97,700
- Result in 442,300 fewer days absent from work
- Reduce crimes by 42,500

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3. CAMRA
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10. Prof Nutt, The Lancet, Volume 376, Issue 9752, Pages 1,558 – 1,565
11. Balance, Four Steps to Alcohol Misuse (2012)
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13. The Department of Health has updated the previous estimate of around £2.7 billion at 2006–07 prices, using the same methodology used in Statistics on Alcohol: England 2012, NHS Information Centre this figure is £3.5 billion
14. Home Office Know Your Limits Binge Drinking Campaign 2007/08
<http://www.alcoholpolicy.net/2008/06/home-office-lau.html>

15. LJMU, Blood alcohol levels and drunkenness amongst people visiting nightlife in the North West (2009)
<http://www.cph.org.uk/showPublication.aspx?pubid=617>
16. LJMU, Alcohol, nightlife and violence: the relative contributions of drinking before and during nights out to negative health and criminal justice outcomes (2008)
17. Alcohol Concern, One on every corner (2011)
<http://www.alcoholconcern.org.uk/assets/files/Publications/one-on-every-corner.pdf>
18. World Health Organisation, Global strategy to reduce the harmful use of alcohol (2010)
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