

Consultation Response – Sunderland Health and Wellbeing Board

The Government wants to ensure that the chosen minimum unit price level is targeted and proportionate, whilst achieving a significant reduction of harm

Consultation Question 1:

Do you agree that this MUP level would achieve these aims? (Please select one option)

Yes	<input checked="checked" type="checkbox"/>	No	<input type="checkbox"/>	Don't know	<input type="checkbox"/>
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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)

Whilst agreeing that MUP is a highly targeted and effective approach that would have greatest impact on younger and heavier drinkers, we'd urge Government to set a MUP between 50-60 based on:

- Sheffield's modelling work on numerous parameters found an MUP of 50p compared to 45p would save annually an additional 1,000 deaths; 31,000 alcohol-related hospital admissions; 18,000 crimes and would reduce consumption by a further 2.4%
- The previous Chief Medical Officer called for a 50p MUP of alcohol in 2009 which at today's value would be in excess of 50p
- The Faculty of Public Health supported the call for a MUP of 50p for alcohol in their "12 Steps to Better Health Manifesto" with 50p MUP being 'Step No. 1'
- The Association of North East Council's Leaders' and Elected Mayors' Group support MUP set at at least 50p
- Consideration needs to be given to cross-border purchases if a MUP below that proposed for Scotland (50p) is set, particularly in border areas in North of England
- We believe that a MUP, particularly set between 50-60p provides clarity and would be easier to enforce than alternative levels of MUP and different ways of raising price.

Consultation Question 2:

Should other factors or evidence be considered when setting a minimum unit price for alcohol? (Please select one option)

Yes	<input checked="checked" type="checkbox"/>	No	<input type="checkbox"/>	Don't know	<input type="checkbox"/>
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If yes please specify in the box below (keeping your views to a maximum of 200 words)

Factors

- MUP should be regularly reviewed to ensure alcohol does not become more affordable over time
- Avoid issue of cross-border purchases if MUP below that proposed for Scotland (50p) is set
- Introduce a mechanism for channelling increased monies received by retailers into reducing the problems caused by alcohol at local level
- Independent evaluations on effectiveness should be done to assess if the level has been set appropriately.

Evidence:

- The BMA support 50p MUP and 80% of GPs in the NE support MUP
- 70% of publicans in the North East (NE) support MUP and 82% state supermarket promotions are hitting their trade
- 18 pubs close each week in Britain. MUP would close the price difference between pubs and cheapest supermarket deals. Community pubs contribute £19 billion and 900,000 jobs to the economy. That contribution is being eroded by cheap off-licence sales alcohol
- 53% of people in the NE, support MUP
- 81% of people in the NE stated they were more likely to support MUP if it reduced drunk and rowdy behaviour– which evidence suggests it would
- 40% of child protection cases and 74% of child mistreatment cases in the UK are alcohol

related

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	<input type="checkbox"/>
The minimum unit price should be automatically be updated in line with inflation each year	<input checked="" type="checkbox"/>
The minimum unit price should be reviewed after a set period	<input type="checkbox"/>
Don't know	<input type="checkbox"/>

Consultation Question 4:

The aim of minimum unit pricing is to reduce the consumption of harmful and hazardous drinkers, while minimising the impact on responsible 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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	Don't know <input type="checkbox"/>
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If Yes please specify in the box below (keeping your views to a maximum of 100 words)

- Would help children through: Fewer drinking / consuming less; reduced risk taking behaviour; reduced exposure to parental alcohol misuse; safeguarded children (alcohol a factor in 40% of child protection cases)
- Help protect victims of domestic abuse - 40% incidents linked to alcohol
- Result in fewer victims of crime & reduced fear of crime
- Benefit frontline workers from time and money saved dealing with excessive alcohol misuse
- Benefit the economy - alcohol harm in Sunderland costs more than £133 million a year
- Benefit community pubs who find it difficult to compete with cheap off license sales

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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	Don't know <input type="checkbox"/>
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<p>Consultation Question 6:</p> <p>Are there any further offers which should be included in a ban on multi-buy promotions? (Please select one option)</p>			
Yes	<input checked="" type="checkbox"/>	No	Don't know
<p>If Yes please specify in the box below (keeping your views to a maximum of 100 words)</p> <p>We'd support ending multi-buy promotions in off and on trade as alcohol is addictive and should not be treated like just another product. Any incentive to purchase and consume more than intended and all promotions e.g. money-off or reductions to other products/services or voucher points, should be prohibited - should include packaging alcohol as part of a meal deal or offering free alcohol on flights or as part of first-class rail travel... There's a need to stop packaging and marketing alcohol in a way that attracts young people. It's often difficult to distinguish packaging of alcoholic and non-alcoholic drinks.</p>			

<p>Consultation Question 7:</p> <p>Should other factors or evidence be considered when considering a ban on multi-buy promotions? (Please select one option)</p>			
Yes	<input checked="" type="checkbox"/>	No	Don't know
<p>If Yes please specify in the box below (keeping your views to a maximum of 200 words)</p> <ul style="list-style-type: none"> • Reductions in consumption levels would improve health inequalities as health harms have a greater impact on lower income groups. For example, alcohol related deaths are 45% higher in areas of high deprivation • Sheffield University research indicated a ban on multi-buy promotions would increase effectiveness of MUP (a 50p MUP plus an off trade discount ban would lead to further falls in consumption resulting in more lives saved, greater falls in hospital admissions, larger falls in alcohol related crimes and bigger falls in absence days and unemployment • Report (29/6/2012) by Prof. Nutt suggested alcohol is the most dangerous drug in the UK beating heroin and crack cocaine into 2nd/3rd place. Unlike illegal drugs, alcohol is as easy to access as regular grocery items. Worryingly, it's used as a loss leader by supermarkets • Cheap alcohol deals result in young people drinking more (Alcohol Concern and Balance Report 'Drinking to Get Drunk') found 16-17 year-olds saying price promotions 'attracted young people to drink more than they would have' • A joined up policy approach that addresses price and availability and quality and co-ordination of hospital and community services is coherent and evidence-based and will deliver better health and crime outcomes 			

<p>Consultation Question 8:</p> <p>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)</p>			
Yes	<input checked="" type="checkbox"/>	No	Don't know
<p>If Yes please specify in the box below (keeping your views to a maximum of 100 words)</p> <p>Lower income groups would benefit as alcohol related deaths 45% higher in high deprivation areas</p>			

and men 5x and women 3x more likely to die an alcohol related death than those in least deprived areas.

Community pubs would benefit as struggling to compete with cheap supermarket prices.

Front line services would benefit as multi-purchase deals encourage pre-loading - leads to more problems in night time economy.

Families would benefit as these deals encourage home drinking where excessive consumption is hidden and harder to control.

Public would benefit as would be discouraged from buying and drinking more alcohol than otherwise would have

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)?

Please state Yes/No/Don't know in each box

		Prevention of crime and disorder	Public Safety	Prevention of public nuisance	Protection of harm to children
A	Irresponsible promotions	Yes	Yes	Yes	Yes
B	Dispensing alcohol directly into the mouth	Yes	Yes	Yes	Yes
C	Mandatory provision of free tap water	Yes	Yes	Yes	Yes
D	Age verification policy	Yes	Yes	Yes	Yes
E	Mandatory provision of small measures	Yes	Yes	Yes	Yes

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 x	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)

Mandatory conditions need amending. Irresponsible promotions would be easier to enforce via a clause to 'demonstrate a significant risk to the licensing objectives'. Condition relating to the age verification policies should stipulate a written policy is advertised within the venue. Anything which encourages greater consumption than intended should **not** be allowed:

- Price-based promotions
- student 'drink bar dry'/pub crawls
- drinks sold in one large container for consumption from it
- mobile sales
- alcoholic drink cheaper than non-alcoholic
- sale of full bottles of spirits in on trade premises
- 35ml spirit and 250ml wine measure should be withdrawn

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) which could be tackled

through a mandatory licensing condition? (Please select one option)		
Yes X	No	Don't know
If Yes please specify in the box below (keeping your views to a maximum of 200 words)		
<p>Yes</p> <ul style="list-style-type: none"> • Age verification training – needs to be more robust • The need to keep a refusals book • Till prompts re age verification (i.e. Challenge 25) • Mandatory training to sell alcohol – needs to be very robust and should include training on how to refuse someone who is already drunk • Provision and promotion of lower strengths beers and wines • Larger stores to keep all alcohol in a single self-contained area within the store • Promotion - not simply provision - of small measures. The 35ml spirit measure should be withdrawn, leaving the 25ml single measure which equates to one unit of alcohol and is easy to track for those counting their alcohol intake. The 250ml wine measure should be withdrawn leaving 175ml as large and 125ml as small • Active promotion of soft drinks • Upselling should be prohibited • Point of sale information should be made compulsory stipulating units of alcohol and the recommended limits together with health harms. 		

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 X	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)		
<p>Alcohol harm problems increasingly associated with cheap alcohol sold from off licence premises. Evidence consistently points to more alcohol being purchased from supermarkets and consumed at home where domestic abuse and child protection can be hidden. Pre-loading is an issue with almost one in two publicans in North East seeing customers arriving drunk because of cheap supermarket offers. People who've pre-loaded before they go out into the night-time economy are more likely to be a victim or perpetrator of crime. Irresponsible promotions could both be applied to off trade together with practices highlighted in our question 10 response.</p>		

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)		
<p>Data considered should be:</p> <ul style="list-style-type: none"> • A&E and ambulance data • Alcohol specific and attributable hospital admissions (adult and U18) • Liver and other alcohol related deaths • Domestic abuse and child protection data • Alcohol related crime figures • Local data • Residents' surveys • Opportunity costs – e.g. cost of alcohol related health harms to the NHS in Sunderland is £31.1 Million p.a. This is more than the cost of a new emergency department and a new CT and MRI scanner 		

Public health should be a licensing objective in its own right and not tied to CIPs. We don't accept the rationale on p7 of the relevant impact assessment stating it would be disproportionate because the alcohol industry is already taking action as part of the Responsibility Deal. Alcohol industry efforts to promote unit information are small and sporadic when compared to the weight of pro alcohol marketing. North East public's awareness of alcohol units has been falling for the last three years.

Public health data should be used to underpin over-provision policies covering entire local authority areas (not tied to a particular location) to ensure overall availability of alcohol is taken into account.

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 X

No

Don't know

If yes please specify which aspects in the box below (keeping your views to a maximum of 200 words)

There is a concern that although the stats from a PCT wide perspective may look compelling, once reduced to neighbourhood / ward size the figure may be small and too easily dismissed. It would be more practical for a public health objective to be linked to local authority-wide saturation policies as this is the level at which data becomes meaningful. It also reflects experience in areas such as West Dumbartonshire. This gives local politicians the opportunity to take control of the availability of alcohol in their council areas, helping to fulfil their new public health responsibility.

The CIP needs to be stricter including looking at the broader area e.g. city level. Cumulative effect is difficult to prove. Responsible authorities should not have to prove an existing problem. CIP are not sufficiently robust in their current form and should be made more robust in advance of adding the health harms evidence. The current presumption is that if someone applies for a license it will be granted. This needs to be change so that the presumption instead is that a license won't be granted unless the applicant can justify why additional licensed premises in the area are needed and justified.

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.

Introducing a public health objective, particularly to support over-provision or saturation policies at the city/borough-wide level, would enable licensing decisions to be made taking into account the full impact of alcohol harm within that council's boundaries. It would enable local authorities to control the availability of alcohol in their area – and we know from the World Health Organisation that availability affects the level of harm.

Fewer premises within a particular area would reduce the need for competitive pricing. It would limit the availability of alcohol at a local level to young people, which we know from Alcohol Concern's report 'One On Every Corner' is an indicator of harm. It would evidence the hidden harm (domestic violence, safeguarding, child protection) of alcohol consumption in terms of home drinking. Finally, through sources such as A&E data, it would help to record the level of alcohol-related assaults reporting to A&E, many of which are not reported to and recorded by the police. The good practice from the Cardiff Model alcohol-related violence data sharing needs to be a national standard.

<p>Consultation Question 16:</p> <p>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 met key criteria for limited or incidental sales? (Please select one option in each row)</p>				
		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			
B	The provision should be available to all businesses providing they meet certain qualification criteria to be an ancillary seller			
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			

<p>Consultation Question 17:</p> <p>If special provision to reduce licensing burdens on ancillary sellers were to include a list of certain types of premises, do you think it should apply to the following? (Please select one option in each row)</p>				
		Yes	No	Don't know
A	Accommodation providers, providing alcohol alongside accommodation as part of the contract –		X	
B	Hair and beauty salons providing alcohol alongside a hair or beauty treatment		X	
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		X	
D	Florists providing alcohol alongside the purchase of flowers		X	
E	Regular charitable events providing alcohol as part of the wider occasion		X	

<p>Consultation Question 18:</p> <p>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? Please write your suggestions in the box below, keeping your views to a maximum of 200 words)</p>	
<p>An increased density of alcohol outlets is associated with increased alcohol consumption among young people, self-inflicted injury and, with less consistent evidence, road traffic accidents. (WHO)</p> <p>We profoundly disagree with the need for 'freeing up the burdens on businesses' to make it easier to sell alcohol. It will increase availability of alcohol and promote the normalisation of alcohol leading to increased personal and social harm and worsen health inequalities. 'Ancillary license' provisions directly contradict the Night Time Levy and Early Morning Restriction Orders in the Police Reform and Social Responsibility Act which give localities greater power to restrict the availability of alcohol in their area.</p> <p>Whilst it may reduce the burden on business, it will increase the costs and stresses on our public services, particularly front line staff at a time of stretched public sector resources. 60% of frontline police officers surveyed in the North East said estimated that dealing with alcohol related crime and disorder took up at least half of their time.</p> <p>There are significant dangers of loopholes should such changes be introduced. For example, would a taxi-firm running a dial-a-drink service qualify for an ancillary license? Would we see even more petrol stations selling alcohol?</p>	

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 X	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)

We'd query what is the legal definition of 'small part of, or incidental to'?

This provision would promote the proliferation of licensed premises. It represents a real risk of alcohol becomes even more normalised and made socially acceptable, thus failing to take into account the negative impact it has on society in terms of health harms, crime and disorder and wider societal and economic issues.

There is serious concern amongst police and local authority partners with regard to whom and how premises would be investigated to ensure that they are still eligible to be classed as an ancillary seller. At times of austerity and job cuts, why should a reduction in bureaucracy for businesses have to result in an increased workload and therefore increased cost for local authorities?

There needs to be a major cultural shift around alcohol through education for all ages to break the cycle of what is the societal norm around alcohol consumption – we need a new and better 'social norm'. Alcohol is too socially acceptable, accessible, available and affordable. Alcohol is now available at all times of day and night and in too many places and there needs to be stricter control of this.

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			
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			
C	Introduce a new light touch form of authorisation for premises making ancillary sales – an 'ASN' but with no requirement for a personal licence holder			

Consultation Question 21:

Do you think that the following proposals would impact adversely on one or more of the licensing objectives? (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	X		
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	X		

C	Introduce a new light touch form of authorisation for premises making ancillary sales – an ‘ASN’ but with no requirement for a personal licence holder	X		
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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)

There needs to be accountability for selling an addictive drug. Who would be responsible for ensuring alcohol is not sold to children or people who are already intoxicated; that significant and appropriate training is provided to staff; that the business is run in support of the licensing objectives?

Community premises are generally non-profit making whilst the proposed ancillary sellers are businesses. At a time when businesses are under pressure, there would be a temptation to make alcohol a more important part of their offer to customers.

Our partners have significant concerns that the legislation would provide loopholes for irresponsible businesses to abuse.

Removing the need to advertise contradicts the government’s consultation: Rebalancing the Licensing Act - on empowering individuals, families and local communities to shape and determine local licensing which resulted in the vicinity test being removed to encourage communities to participate in licensing at local level.

The proposal to withdraw the annual fee for ancillary sellers is a real concern to local authorities as licensing even with the licensing fees is not cost neutral. Again, the previous consultation introduced the ability to set fees to cover costs, yet with this proposal, a significant number of premises would be exempt.

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 X	Don’t know
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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			
B	Increase the burden			

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 X	Don’t know
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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		X	
B	Determining that certain areas are exempt in their local area		X	

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 services should receive a nationally prescribed exemption from regulations for the provision of late night refreshment	X		

Consultation Question 29: Please describe any other types of premises to which you think a nationally prescribed exemption should apply (keeping your views to a maximum of 100 words)	
None – the World Health Organisation states that one of the key ways to reduce alcohol harm is to control the availability of alcohol. Alcohol is more available than ever before. It is available 24 hours a day, seven days a week and dial a drink services mean it can even be delivered to your door. The suggestions laid out here risk compounding the errors made in trying to create a so called 'café/24 hour drinking culture'. The introduction of reducing burdens for ancillary sellers would exacerbate the availability and accessibility of alcohol.	

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 the requirements to advertise licensing applications in local newspapers		X	
B	Remove the centrally imposed prohibition on the sale of alcohol at MSA's for the on and off trade		X	
C	Remove the centrally imposed prohibition on the sale of alcohol at MSA's but only in respect of overnight accommodation – "lodges"		X	
D	Remove or simplify requirements to renew personal licences under the 2003 Act		X	

Consultation Question 31: Do you think that each of the following would reduce the overall burdens on business? (Please	
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select one option in each row)				
		Yes	No	Don't know
A	Remove the requirements to advertise licensing applications in local newspapers			
B	Remove the centrally imposed prohibition on the sale of alcohol at MSA's for the on and off trade			
C	Remove the centrally imposed prohibition on the sale of alcohol at MSA's but only in respect of overnight accommodation – "lodges"			
D	Remove or simplify requirements to renew personal licences under the 2003 Act			

Consultation Question 32: Do you think that the following measures would impact adversely on one or more of the licensing objectives? (Please select one option in each row)				
		Yes	No	Don't know
A	Remove the requirements to advertise licensing applications in local newspapers	X		
B	Remove the centrally imposed prohibition on the sale of alcohol at MSA's for the on and off trade	X		
C	Remove the centrally imposed prohibition on the sale of alcohol at MSA's but only in respect of overnight accommodation – "lodges"	X		
D	Remove or simplify requirements to renew personal licences under the 2003 Act	X		

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)				
<p>31 & 32 A - limits the ability to engage local communities, an ambition set out in 'Rebalancing the Licensing Act.</p> <p>31 & 32 B & C – send a negative mixed message about drinking and driving, increases availability, and underlines a pro-alcohol culture.</p> <p>31 & 32 D – the need for a personal license underlines the seriousness of selling alcohol and makes an individual directly responsible for the safe and responsible sale of alcohol. It should not be removed.</p>				

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		X	
B	Multi-buy promotions			
C	Health as an objective for cumulative impact		X	
D	Ancillary sales of alcohol		X	

E	Temporary Event Notices			
F	Late night refreshment			
G	Removing the duty to advertise licensing applications in local newspapers			
H	Sales of alcohol at motorway service stations			
I	Personal licences			

<p>Consultation Question 35:</p> <p>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.</p>		
Yes X	No	Don't know
<p>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).</p> <p>Impact Assessment: A minimum Unit Price for Alcohol</p> <p>Ref: p5: We believe the estimates are likely to under represent the costs associated with alcohol harm. For example, a report from the National Social Marketing Centre which includes wider social harm puts the economic cost at £55 billion. Balance's own work in this area includes social services related costs of £1.9 billion. From conversations with police officers from three constabularies in the North East, we believe it is also likely that the costs associated with crime and disorder are significantly higher than has been assumed. We believe alcohol-related crime is under recorded, as evidenced by a Balance survey of over 1,000 frontline officers in the North East of England which found that 60 per cent perceived alcohol related crime and disorder to take up at least half of their time.</p> <p>Ref p10: We are concerned that new methodology has been applied to work out the benefits delivered by a MUP at 45p. While we accept that the methodology should be updated to take account of inflation, no comparison has been provided for a MUP set at alternative levels such as 50p.</p> <p>There is also no rationale as to why the figure of 45p has been chosen. In its report on the Government's Alcohol Strategy the House of Commons Health Committee states that: "If the minimum unit price in England were to be fixed at a different level to that in Scotland, we would expect the evidence supporting that decision to be set out clearly."</p> <p>Impact Assessment: Health as an objective for cumulative impact</p> <p>Ref p7: In principle public health as an objective should be ranked alongside the other four licensing objectives and not tied to CIPs. The only argument for such a link is the practical one of being able to using meaningful public health data. We do not accept the rationale for the link made in the impact assessment. It is not disproportionate for the industry to promote sensible drinking and low and non-alcoholic drinks. In fact they should be forced to do so as their current corporate social responsibility programmes in this area are not working. Take the question of the awareness of units, which the document refers to as being promoted by the alcohol industry. In a Balance survey of over 1,800 members of the North East public, awareness of measuring alcohol in units was 87%, down from 92% in 2010. Awareness that there is a maximum recommended limit has fallen from 82% to 69% over the same period, with less than half of those interviewed being able to name the limits.</p> <p>Impact Assessment: Ancillary sellers</p> <p>Ref p 1, 2, 3: We are concerned that the potential benefits to business are insufficient to run the risk of increased alcohol-related health harms, a risk highlighted on also highlighted in the document.</p> <p>Ref p6: We are concerned that the section on "Minimal" sales is highly ambiguous and provides no reassurance that loopholes would not be created. Local decisions by licensing authorities are likely to be subject to legal challenge, an expensive process for local authorities, especially given the current economic climate.</p> <p>Ref p8: The document estimates that up to 9,116 new alcohol sales venues could be created after three years, a significant increase in the availability of alcohol. This figure is partly based on the take up of licenses by 'community premises'. While the figure has been increased from 4% to 6%, we believe that increase may be insufficient given the profit motive behind businesses which is not so present for community premises.</p>		