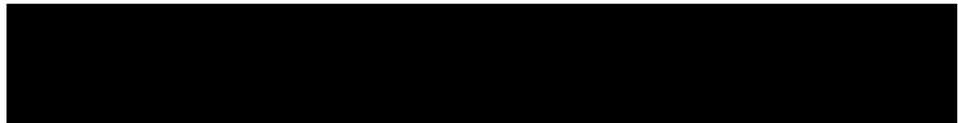


Greater Manchester Health & Wellbeing Interim Board draft response to 'A consultation on delivering the Government's policies to cut alcohol fuelled crime and anti-social behaviour'



The Association of Greater Manchester Authorities (AGMA), in partnership with the NHS and local alcohol industry partners have campaigned in favour of introduction minimum unit price for alcohol. Greater Manchester's work helped stimulate a national debate on this issue, while work proceeded to consider how minimum unit price might be implemented locally.

Throughout 2010-2012 the Greater Manchester Health Commission led a coalition of local organisations to raise the profile of alcohol related harm. Alcohol is one of the major lifestyle-related factors that causes poor health in the city region. Greater Manchester was disproportionately affected by alcohol related harm with six out of the 10 most affected boroughs in England being in Greater Manchester. Following a review of governance arrangements the Health Commission has been replaced by a Greater Manchester Health & Wellbeing Board. The new Board is pleased to see the Government's response to calls for a minimum unit price – but would stress this mechanism is only one way of reducing alcohol related harm amongst a broader package of measures.

Greater Manchester has worked closely with the private sector in campaigning on minimum unit price, most notably the local brewery JW Lees. This response has been shared with the Greater Manchester Local Enterprise Partnership and the Business Leadership Council. Advice from JW Lees concurs with the AGMA's view that 50p is the preferred minimum unit price.

It should be noted that due to inflation since the University of Sheffield's model in 2009, this figure is now equivalent to 54p. This would achieve far better outcomes than the proposed 45p price level.

A number of the questions in the consultation relate to technical questions regarding alcohol licensing, 'ancillary seller status' and cumulative impact policies (CIP). The Board has restricted its response to those questions where it has previously agreed a clear policy position.

This consultation response draws upon an outline response produced by Drinkwise Northwest.

Consultation Question 1:

Do you agree that this MUP level would achieve these aims?

Yes

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).

The GM Health & Wellbeing Board is fully supportive of MUP and strongly believes setting the minimum unit price level at 50p would achieve far better outcomes than proposed lower price levels. The ScHARR model (University of Sheffield, 2009), found that, after 10 years a 50p price level would save:

- 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.

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.

Although the Board and AGMA signed up to supporting a price of 50p, it should be recognised this is based on 2009 prices. In order to achieve the same benefits as the ScHARR modeling the relevant price would now be 54p.

Consultation Question 2:

Should other factors or evidence be considered when setting a minimum unit price for alcohol?

Yes

If yes, then please specify these in the box below (keeping your views to a maximum of 200 words).

- AGMA has worked closely with the alcohol industry in GM - public houses, bars and other on-trade premises will greatly benefit from the introduction of a minimum price as the differential in prices for alcohol retailed in the off-trade and on-trade would be reduced. We believe that this would result in a shift of drinking patterns to on-trade premises which is not only generally a safer and regulated environment to consume alcohol but also good for small community based businesses and family run pubs. This is particularly important at a time when The Campaign for Real Ale is reporting that 16 pubs every week are closing down.
- In the North West of England there will be serious cross border issues if the price level is set at 45p as the Scottish Government is proposing a minimum unit price of 50p. This will create a price differential which will encourage people to visit England to purchase and consume alcohol and potentially negate the effectiveness of the minimum unit pricing policy.
- Inflation since the ScHARR study was published in 2009 would mean that 50p is now valued at 54p, this means that minimum unit pricing should be measured in terms of success against revised levels from 2014 when this policy will be implemented.

Consultation Question 3:

How do you think the level of minimum unit price set by the Government should be adjusted over time?

The minimum unit price should be automatically updated in line with inflation each year.

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?

Yes

If Yes please specify in the box below (keeping your views to a maximum of 100 words).

- 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.
- 43% of people in the North West are afraid to enter town centres at night – reduction in harm would reduce crime and the fear of crime.
- Frontline workers would benefit from less drunken violence
- There would be a positive effect on offenders - 63% of male offenders are problem drinkers

Consultation Question 5:

Do you think there should be a ban on multi-buy promotions involving alcohol in the off-trade?

Yes

Consultation Question 6:

Are there any further offers which should be included in a ban on multi-buy promotions?

Yes

If yes, please specify in the box below (keeping your views to a maximum of 100 words).

- 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?

Yes

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

- The SchARR study found that there is a far greater impact of the multi-buy ban policy when enforced in concert with a minimum unit price policy. We believe that a multi-buy ban will be more effective if implemented with a 50p minimum unit price rather than at 45p.
- Marketing of alcohol should be legislated for, to ensure that it does not circumvent the spirit and intention of this legislation.
- A recent report by Alcohol Concern and Balance, the North East Alcohol Office (Binge!, November 2012) published the results of survey work of 16-24 year olds who said that promotions on alcohol products encouraged them to drink more. So a multi-buy ban would protect more children and young people from alcohol.
- Multi-buy promotions encourage people to buy more alcohol than they intend which means there is greater access to alcohol in the home environment. We already know that children access alcohol from the home more than any other place, 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.
- Reduced consumption would improve health inequalities as lower income groups suffer greater health harms.

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?

Yes

If yes, please specify in the box below (keeping your views to a maximum of 100 words).

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.

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)?

		Prevention of Crime And Disorder	Public Safety	Prevention of Public Nuisance	Protection of Harm From Children
A.	Responsible Promotion	YES	YES	YES	NO
B.	Dispensing Alcohol Directly Into The Mouth	YES	YES	YES	NO
C.	Mandatory Provision Of Free Tap Water	YES	YES	YES	NO
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?

No

If yes, please specify in the box below (keeping your views to a maximum of 100 words).

- Licensees should train and re-train their staff to be accredited to a national standard for the safe and responsible retailing of alcohol.
- Remove the 'glamourisation' test for promotions and ban all irresponsible promotions.
- Remove the 'need to demonstrate a link with crime and disorder' clause relating to irresponsible promotions as it is too restrictive.
- The unit content of all drinks should be clearly visible at the point of sale so customers know what they are drinking.
- Age verification schemes should be a minimum 'check 25', have a written policy and include mandatory signage on premises.

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?

Yes

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

- A proportionate seating and standing ratio should be dictated by the capacity of the premises.
- Soft drinks should be priced cheaper than the cheapest alcoholic drink thus removing a possible encouragement for people to drink alcoholic drinks if they are cheaper.
- A ban on irresponsible drinks promotions should be applied to the off-trade.
- Loyalty point schemes for the purchase of alcohol which encourages increased consumption 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 should be banned as they are schemes selling discounted alcohol.
- Organised commercial pub crawls should be banned as they encourage the consumption of excess alcohol in a short space of time in many premises which leads to drunkenness and anti-social behaviour.
- Ladies nights, (where there are discounted or free drinks based on a customers' sex) should be banned as they encourage excessive consumption of alcohol.

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

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 (The Cost of Alcohol to the North West Economy, Drink Wise North West, 2012). 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:

- Save 3,060 lives

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