

# Health Networks

## Alcohol Consultation Response

January 2013

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"/>
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>Alcohol harm reduction is a key priority for our Network and we agree that a minimum unit price is a targeted and proportionate approach in helping to reduce those harms. MUP set at an adequate level will impact most on higher risk and younger drinkers without affecting lower risk drinkers. We believe that a MUP of 50p would be the optimum price per unit as, according to the University of Sheffield, it would save an extra 1,000 deaths; 31,000 alcohol-related hospital admissions; and would reduce consumption by a further 2.4% a year in comparison to 45p yet would still have very little impact on responsible drinkers.</p> <p>The Faculty of Public Health supports the MUP of 50p as does the Director of Public Health for County Durham.</p> <p style="text-align: right;">(words: )</p>		

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"/>
If yes please specify in the box below (keeping your views to a maximum of 200 words)		
<p><b><u>Factors</u></b></p> <ul style="list-style-type: none"><li>• The North-East proximity to Scotland where MUP of 50p is to be introduced.</li><li>• Additional revenue made through the MUP needs to be effectively channelled into local areas to help further reduce alcohol harms.</li><li>• The correlation between affordability and consumption - MUP should be set at no less than 50p per unit, and regularly reviewed to ensure alcohol does not become more affordable over time.</li></ul> <p><b><u>Evidence:</u></b></p> <ul style="list-style-type: none"><li>• We estimate between 38% and 65% of the population in County Durham is drinking at harmful levels. Targeted action at a population level needs to be taken to turn back this tide.</li><li>• County Durham has the 13<sup>th</sup> highest rate of under-18 alcohol specific hospital admissions in England. Evidence from Sheffield University indicates that a minimum unit price set at 50p</li></ul>		

- would result in larger reductions in alcohol consumption amongst this group.
- Alcohol is costing the economy in County Durham over £189 million a year

(words: )

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 ☒ No ☐ Don't know ☐

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

A 50p MUP would:

- delay the age young people start to drink,
- reduce consumption for young people who drink,
- reduce alcohol-related risk taking behaviour amongst young people and its consequences,
- reduce alcohol consumption in the home reducing the number of young people exposed to parental alcohol use, misuse and child protection proceedings,
- help to turn the tide on domestic abuse – over 40% of cases currently are linked to alcohol,
- save local services time and money in dealing with excessive alcohol use and misuse.

(words: )

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)

We would support an end to multi-buy promotions in both the off **and on** trade. Alcohol is an addictive drug and should treat as such.

Any incentive to purchase or consume more than intended whether on or off license – such as money off or reductions to other products or services or voucher points, or buy two glasses get the rest of the bottle free, two measures for £1.50 – should be prohibited. This should include packaging alcohol as part of a “meal deal” or offering free alcohol on flights or as part of first-class rail travel.

(words: 95)

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 <input checked="checked" type="checkbox"/>
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If Yes please specify in the box below (keeping your views to a maximum of 200 words)

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 <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 100 words)

Young people – improved health, school attainment and reduced risk of becoming a victim or perpetrator of crime/ASB.

People living in deprived areas - men are five times, and women three times, more likely to die from an alcohol related cause than those in the least deprived areas.

Families - multi-buy deals encourage home drinking where excessive consumption is hidden and harder to control.

Emergency Services - cheap deals encourage pre-loading which leads to problems in the night time economy.

(words: 79)

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
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A	Irresponsible promotions				
B	Dispensing alcohol directly into the mouth				
C	Mandatory provision of free tap water				
D	Age verification policy				
E	Mandatory provision of small measures				

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)

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	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)

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
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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)

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)

We believe that public health should be a licensing objective in its own right and not tied to CIPs. We do not accept that it would be disproportionate because the alcohol industry is already taking action as part of the Responsibility Deal as previous agreements, such as alcohol labelling have come to little effect.

Available data includes:

- Accident and Emergency data
- Ambulance data
- Alcohol specific hospital admissions

- Alcohol attributable hospital admissions
- Under 18 admissions
- Liver and other alcohol related deaths
- Alcohol Treatment Service data
- Domestic abuse, sexual violence and child protection data
- Health Inequalities data
- Local data sources, e.g. residents' surveys.

We acknowledge that it is difficult to tie public health data to a specific licensed premise, particularly an off licence which is why we feel that public health data should be utilised to establish Licensing Policy per se and not be restricted to CIPs.

Furthermore, public health should be a consideration at the highest level in local authorities, playing a central role in planning and economic development.

(Words: 178)

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)

The evidential basis for a CIP would need to be expanded to enable consideration of public health issues as a basis for a CIP. Without a specific licensing objective in relation to public health we would encourage the Government to see public health as a public safety issue and enable health data to be used alongside other data (not specifically linked to crime and disorder) to determine where/whether a CIP would be appropriate for a certain area.

We would also encourage in any future guidance on CIPs explicit allowance of inclusion of the off-license trade within a CIP and not just sale for consumption on the premises.

(Words: 107)

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.

We believe that alcohol-related health harm data should be used in all licensing decisions not just that of a CIP. Introducing a public health data to support a CIP would enable licensing decisions to be made taking into account the full impact of alcohol related harm and health inequalities in an area. It would ensure that Licensing Committees are able to consider not only the perceived benefits for culture and leisure that alcohol brings but also the health inequalities and disadvantages alcohol brings to communities and enable them to make a full evidence based assessment on the necessity of any new licence.

We believe that it would help to limit the availability of alcohol where it is most needed, particularly to young people. We know from Alcohol Concern's report 'One On Every Corner' availability of alcohol to young people is an indicator of harm.

(Words: 144)

<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 –			
B	Hair and beauty salons providing alcohol alongside a hair or beauty treatment			
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			
D	Florists providing alcohol alongside the purchase of flowers			
E	Regular charitable events providing alcohol as part of the wider occasion			

<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 suggestion in the box below, keeping your views to a maximum of 200 words)</p>

<p>Consultation Question 19:</p> <p>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)</p>		
Yes	No	Don't know
<p>If no please describe the changes you would make in the box below (keeping your views to a maximum of 200 words)</p>		

<p>Consultation Question 20:</p> <p>Do you think that these proposals would significantly reduce the burdens on ancillary sellers?(Please select one option in each row)</p>
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		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			

<p>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)</p>				
		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			

<p>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)</p>

<p>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)</p>		
Yes	No X	Don't know

<p>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)</p>				
		Yes	No	Don't know
A	Reduce the burden			
B	Increase the burden			

<p>Consultation Question 25: Should the number of TENs which can be given in respect of individual premises be increased?</p>
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(Please select one option)		
Yes	No	Don't know

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)	

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			
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 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 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			
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 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)

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

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 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>		