

Dear Sirs,

We are grateful for having the opportunity to submit views on the Government's alcohol strategy (<http://www.homeoffice.gov.uk/publications/about-us/consultations/alcohol-consultation/>)

The Spanish Wine Federation (FEV) is a private organization that represents the Spanish winery industry grouping 800 wineries, directly or through the main regional or sectorial associations. Since its creation in 1978, the FEV has been working on behalf of the whole wine sector and especially for the wineries as a basic part of this sector. Nowadays, it has become the first national reference in the wine field and a main driving force and representative of it all in Spain and internationally. We must also point out the active work done by the FEV in the implementation of the European Wine in Moderation Programme: a real compromise from the sector that promotes the responsible consumption of wine, committed by the EU wine sector (represented by CEEV) to the European Alcohol and Health Forum in the framework of the EU Strategy to support Member States in reducing alcohol related harm -COM(2006) 625 final-

While we welcome your targeting of harmful drinking, FEV believes that Minimum Unit Pricing (MUP) policy:

- represents an illegal barrier to trade that breaches the functioning of the internal market, incompatible with the EU law –EU Treaty and the Common Agricultural Policy rules-, as well as with international trade rules –bilateral and multilateral agreements, and is not justified, appropriate nor proportionate to achieve the pursued objective;
- discriminates between companies in the market;
- conflicts with EU CAP / wine policy objectives, namely “to reach a market balance”, and “to increase the competitiveness of EU wine producers”;
- does not address the harmful drinking problem it sets out to solve;
- does negatively affect the vast majority of people who do not abuse alcohol in any way;
- will set a potentially dangerous precedent for non-EU countries to block European products from entering their markets.

FEV fully supports the comments regarding Minimum Unit Pricing made by both the Wine and Spirits Trade Association and the Scotch Whisky Association in their own submissions to this consultation.

Also we respectfully ask the UK Government to take into full consideration the detailed opinion issued by the European Commission on the same proposal submitted by Scotland to refrain from using price policy instruments to address alcohol-related harm.

Many thanks indeed for your kind attention. We remain at your disposal for any further request or details.

Yours faithfully,