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Re: Additional comments from Sunderland City Council on the Alcohol Consultation.

Dear Sir / Madam

As we're sure you're aware, alcohol is having a devastating impact across the North East of England and we see the cost this is having upon our communities on a daily basis. The Government's Alcohol Strategy is a real opportunity to make significant progress in tackling alcohol misuse in our region.

Every day we see the effect alcohol harm is having on individuals, families and communities across our region:

- The North East of England has the highest rate of alcohol-related alcohol admissions in England,
- We have the highest rate of under 18s in alcohol treatment in England
- The region experiences the highest under 18 alcohol specific hospital admissions in England
- We suffer from the highest rate of male alcohol related deaths in England
- Around half of violent crime is related to alcohol
- Almost 40% of domestic abuse linked to alcohol
- Around half of all violent incidents take place at the weekend when binge drinking is most prevalent
- Over a third of frontline police officers in the region have been injured four or more times by drunken members of the public, according to a recent survey

Our children suffer from the wide availability and heavy promotion of cheap alcohol. Something like 40% of child protection cases and three-quarters of child mistreatment cases have a link to alcohol. Even non-drinkers are paying the price of alcohol harm, as dealing with the problem costs.

In Sunderland, the impact of alcohol-related issues is £133.34 million a year – split by:

- £31.18 million in costs to the NHS
- £38.01 million in crime and licensing costs
- £54.22 million in costs to the workplace and wider economy
- £9.93 million in social services costs

It is time to turn the tide of alcohol harm.

Proposal to introduce a minimum unit price

We welcome the Government's continued commitment to introduce a minimum price per unit of alcohol. It is a highly targeted and effective approach that would have the greatest impact on younger and heavier drinkers. However, we believe that this

measure does not go far enough and needs to be set at an effective and realistic level – no lower than 50p per unit.

The University of Sheffield has modelled the effects of MUP on a number of parameters. A MUP of 50p compared to a MUP of 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%. Do we really value life so cheaply that we'd sacrifice a thousand lives for the sake of 5p extra per unit?

The previous Chief Medical Officer called for a 50p MUP of alcohol in 2009. A 50p MUP is also supported by a range of organisations and businesses including the Association of North East Council's Leaders' and Elected Mayors' Group and the British Medical Association. Recent surveys carried out in the North East also indicate that MUP has the support of the police, GPs and the majority of the general public.

Proposal to end multi-buy promotions

There needs to be a change in mindset and the view reinforced that excessive drinking is socially unacceptable. Plans to introduce a ban on multi-buy discount deals are to be welcomed as they encourage people to purchase and consume more than intended. But it should also cover the on trade. In a recent report from Alcohol Concern and Balance, the North East Alcohol Office ('Drinking to Get Drunk – Influences on young adult drinking behaviours') it was noted that a North East focus group of 16 and 17 year olds felt that promotions such as 'Buy One Get One Free' attracted young people to drink more than they would and to 'drink to get drunk'.

The mandatory licensing conditions

The mandatory licensing conditions, which target problems such as irresponsible promotions in pubs and clubs, are having some effect but don't go far enough. Anything which encourages greater levels of consumption than intended should not be allowed, including:

- Price-based promotions
- Other incentives, e.g. meal deals or voucher schemes
- Student 'drink the bar dry' promotions
- Organised pub crawls associated with students
- Drinks sold in one large container for consumption from that container, e.g. 'goldfish bowls'
- Mobile sales, e.g. shots sold from a tray or dispensed from a tank at your table
- offering an alcoholic drink cheaper than one without alcohol, i.e. vodka and coke vs coke alone
- The sale of bottles of spirits in on trade premises

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.

Health as a licensing objective

**Re: Additional comments from Sunderland City Council on the Alcohol Consultation.
5th February 2013**

We welcome the proposal that health becomes a new alcohol licensing objective, but it should be given equal weight with the other licensing objectives. Local people need to be given greater control over the density of premises and availability of alcohol in their communities. Given their new responsibilities, public health and wellbeing in its widest sense should be a fundamental consideration when it comes to evaluating everything a local authority does.

Reducing red tape

There is no single answer to effectively eradicating alcohol misuse and a combination of measures is needed to tackle the problem. The MUP has the potential to be an important tool alongside a wider range of approaches from pricing and unit measures to education, marketing controls and stricter licensing. Prevention is key and there needs to be a major cultural shift around alcohol.

The proposals set out in this section of the consultation will only increase the availability of alcohol and further cement our pro-alcohol culture. It will lead to increased personal and social harm. It will worsen health inequalities. It will say to our children that alcohol has to be a central part of adult life. They must not be allowed to go ahead.

This consultation is a real opportunity to make significant progress in tackling alcohol misuse and we would urge the Government to take note of the independent evidence base and public health, police and other frontline professionals and reduce the affordability and availability of alcohol for the benefit of all of us.

We would like you to consider these additional views alongside our on-line responses to the consultation.