

## Alcohol strategy consultation

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### Page 1: About you

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Q1. Please select if you would like your response or personal details to be treated as confidential.

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*No Response*

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Q2. Which of the following best describes you or the professional interest you represent? Please select one option from the menu below.

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Public health body (eg Primary Care Trust, Local Health Board, Director of Public Health)

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**Please specify which organisation, licensing authority or police force you represent in the box below:**

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Public Health Directorate, NHS Bristol, [REDACTED]

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Q3. If you are responding on behalf of an organisation or interest group, please write in the box below the number of members in your group or organisation.

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*No Response*

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Q4. How did you obtain the views of your members? Please explain in the box below keeping your response to a maximum of 100 words.

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Consultations between Public Health alcohol lead, Public Health Substance Misuse Strategic lead, Director of Public Health and Head of Bristol City Council Licensing

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Q5. Please indicate in which region you or your organisation is based. Please select one option from the menu below.

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South West England

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Q6. If you are responding as a member of the public, what is your gender? Please select one option.

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No Response

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Q7. If you are responding as a member of the public, what is your age? Please select one option.

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No Response

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## Page 2: A minimum unit price for alcohol

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Q8. In the alcohol strategy, the government committed to introducing a minimum unit price for alcohol in England and Wales. This consultation will contribute to the debate on the most appropriate price per unit and the mechanism by which, once set, minimum unit pricing would remain effective. It is also an opportunity for interested parties to raise other issues around minimum unit pricing. The purpose of minimum unit pricing is to reduce alcohol consumption, particularly by the most hazardous and harmful drinkers who tend to show a preference for the cheapest alcohol products. By doing so the government estimates there will be a reduction in the associated crime and health harms, especially the numbers of hospital admissions, alcohol-related deaths and alcohol-related crimes. Minimum unit pricing is not intended disproportionately to affect responsible drinkers or particular social groups but to reduce the availability of alcohol sold at very low or heavily discounted prices. More information (including the definitions of hazardous and harmful drinkers) is available in the full consultation document and the impact assessment. Do you want to answer questions on minimum unit pricing? Please select one option.

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Yes

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## Page 3: A minimum unit price for alcohol

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Q9. The impact of minimum unit pricing will depend on the price per unit of alcohol. The government wants to ensure that the chosen price level is targeted and proportionate, whilst achieving a significant reduction of harm. The government is therefore consulting on the introduction of a recommended minimum unit price of 45p. The government estimates a reduction in consumption across all product types of 3.3 per cent, a reduction in crime of 5,240 per year, a reduction in 24,600 alcohol-related hospital admissions and 714 fewer deaths per year after ten years. Do you agree that this minimum unit price level would achieve these aims? Please select one option.

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Yes

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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):***

There is evidence of reasonable quality to suggest that the introduction of a minimum unit price (MUP) for alcohol will reduce alcohol-related harm, the proposals should therefore reduce harm from alcohol. However the level at which such a MUP is set would appear to be critically important, with the health benefits rising sharply at a 70p/unit level.

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Q10. Should other factors or evidence be considered when setting a minimum unit price for alcohol?  
Please select one option.

Yes

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

MUP should not be seen as a 'silver bullet' but as part of a package of measures, including training of bar staff, better enforcement of existing legislation, and community education. As a minimum the MUP should be protected against inflation. However, the largest health benefit is achieved at a higher level than the proposed 45p/unit. We suggest starting at 55p minimum price per unit rising to 65p then 75p over a three year period in order to achieve the greatest health gain. This will allow time for the impact of the measure to be assessed, and associated campaigns to be effective; therefore it should also be reviewed after a set period.

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Q11. The government wishes to maintain the effectiveness of minimum unit pricing and is therefore proposing to adjust the minimum unit price level over time. How do you think the level of minimum unit price set by the government should be adjusted over time? Please select one option.

The minimum unit price should be reviewed after a set period

Score

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Q12. 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

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

Severely dependent drinkers will not be able to afford alcohol and may go into withdrawal. Bristol street drinkers drink between 100 and 400 units/ w (exceptionally 700 unit/w). At 45p/unit that will cost them £45 - £180 (exceptionally £315). They will run out of dole money and alcohol in a couple of days, and then they could develop DT's, start fitting, etc (risking brain damage and death). Primary care use, ED attendance and hospital admissions for emergency detoxs will increase. Street drinkers often choose alcohol over food, so we can expect an increase in malnutrition in the cohort as well.

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Page Score

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## Page 4: A ban on multi-buy promotions in the off-trade

Q13. The government is consulting on introducing a ban on multi-buy promotions in the off-trade (e.g. shops and off-licences) as part of its wider strategy to reduce excessive alcohol consumption, and alongside the introduction of a minimum unit price. A ban on multi-buy promotions would therefore not apply to pubs, clubs, bars or restaurants. The term 'multi-buy promotions' refers to alcohol promotions that offer a discount for buying multiple items. The aim of a ban would be to stop promotions that encourage people to buy more than they otherwise would, making it cheaper (per item) to purchase more than one of a product than to purchase a single item. As well as being part of a wider strategy to reduce consumption and tackle irresponsible alcohol sales, a ban on multi-buy promotions would also contribute

to the government's aim of encouraging people to be aware of how much they drink and the risks of excessive drinking, so that they can make informed choices. The aim of this consultation is to assess support for such a ban and contribute to our understanding of the impact a ban on multi-buy promotions may have. The types of promotion it is proposed that a ban would include, are: two for the price of one, three for the price of two, buy one get one free, buy six and get 20 per cent off, 24 cans of lager costing less than 24 times the cost of a single can of lager in the shop, a case of wine sold cheaper than the individual price at which the same bottles are sold in the shop, 3 for £10 where each bottle costs more than £3.33. More information is available in the full consultation document and the impact assessment. Do you want to answer questions on a ban on multi-buy promotions in the off-trade? Please select one option.

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Yes

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## Page 5: A ban on multi-buy promotions in the off-trade

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Q14. Do you think there should be a ban on multi-buy promotions involving alcohol in the off-trade? Please select one option.

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Yes

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Q15. Are there any further offers which should be included in a ban on multi-buy promotions? Please select one option.

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Yes

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

The legislation should provide (eg via provision for Orders in Council) for the ingenuity of the industry and retailers to invent ways of subverting its intentions.

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Q16. Should other factors or evidence be taken into account when considering a ban on multi-buy promotions? Please select one option.

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Yes

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

In the same way that consumers are now shielded from open display of 'adult' magazines, alcohol should not be displayed alongside everyday groceries, but kept in an 'adults-only' section of larger stores, or behind the counter in smaller shops.

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Q17. 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.

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Don't know

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## Page 6: Reviewing the mandatory licensing conditions

Q18. In its response to the 'Rebalancing the Licensing Act' consultation in 2010, the government committed to review the impact of the current mandatory licensing conditions. More recently, the alcohol strategy made a commitment to review these mandatory licensing conditions to ensure they are sufficiently targeting problems such as irresponsible promotions in pubs and clubs. The government has also committed to consult on whether these mandatory licensing conditions should, where relevant, apply to both the on- and off-trade. This consultation forms part of that review, and will contribute to the government's understanding of how these mandatory conditions are perceived. The five mandatory licensing conditions currently set out in regulations in relation to the supply of alcohol are: a ban on irresponsible promotionsa ban on dispensing alcohol by one person directly into the mouth of anothera requirement to provide free tap water on request to customersa requirement to have an age verification policy to prevent the sale of alcohol to persons under 18 years of age, anda requirement to make available to customers small measures such as half pints or beer or cider or 125ml glasses of wine More information is available in the full consultation document. An explanation of each of these terms can be found on page 20 of the consultation document, in the glossary at the end. Do you want to answer questions on reviewing the mandatory licensing conditions? Please select one option.

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Yes

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## Page 7: Reviewing the mandatory licensing conditions

Q19. Do you think each of the mandatory licensing conditions is effective in promoting the licensing objectives? For more information on the licensing objectives please see the glossary at the end of the full consultation document. Please select one option (Yes, No, Don't know) from each drop down menu.

	Prevention of crime and disorder	Public safety	Prevention of public nuisance	Protection of children from harm
Irresponsible promotions	Yes	Don't know	Don't know	Yes
Dispensing alcohol directly into the mouth	Yes	Yes	Yes	No
Mandatory provision of free tap water	Yes	Yes	Yes	No
Age verification policy	Yes	Yes	Yes	Yes
Mandatory provision of small measures	Yes	Yes	Yes	No
Score				
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Q20. Do you think that the mandatory licensing conditions do enough to target irresponsible promotions

in pubs and clubs? Please select one option.

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Don't know

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Q21. Are there other issues related to the licensing objectives which could be tackled through a mandatory licensing condition? Please select one option.

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Yes

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

1. Establishments where drinkers are forced to stand through lack of seating and tables are associated with higher levels of drinking, and incidence of violence. A minimum ratio of seats to customers should be considered. 2. Off trade should not sell alcohol between 10pm and 10 am. This would include home delivery. This would reduce the availability of alcohol (availability increases health harm at a population level) 3. Alcohol should be in a separate part of the off-trade from other goods (shops, supermarkets, etc) to reduce the use of product placement marketing of alcohol, for instance putting alcohol at the entrance to supermarkets can increase the amount sold. 4. Goods aimed at children (sweets and children's comics) should not be sold alongside alcohol in shops as this can increase the opportunity for children to shoplift alcohol and the proximity to their treats will encourage them to think that alcohol is an everyday adult treat.

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Q22. Do you think that 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.

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No

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***If no, please explain why you think the current approach is not the best approach (keeping your views to a maximum of 100 words):***

Additional conditions should be applied to the off-trade: 1. Off trade should not sell alcohol between 10pm and 10 am. This should include home delivery. 2. Alcohol should be in a separate part of the off-trade from other goods (shops, supermarkets, etc). 3. Alcohol should not be sold in the first section of supermarkets 4. Goods aimed at children (sweets and children's comics) should not be sold alongside alcohol. 5. In grocery shops which also sell alcohol, it should not be displayed alongside everyday goods, but kept in an 'adults-only' section of larger stores, or behind the counter in smaller shops.

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## Page 8: Health as a licensing objective for cumulative impact policies

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Q23. We want to ensure that licensing authorities are able to take alcohol-related health harms into consideration when making decisions about cumulative impact policies (CIPs) which can be used to manage problems linked to the density of premises in specific areas. A CIP introduces a rebuttable presumption that all new licence applications and variations in that area will normally be refused if the licensing authority receives a relevant representation stating that the application will add to the cumulative impact. However each application must still be considered on its own merits and the licensing authority may still grant the application if it is satisfied that the application will not contribute to the cumulative impact. We are proposing that licensing authorities will be able to take evidence of alcohol-related health harm into account in deciding whether to introduce a CIP and the extent of that CIP. This would be a discretionary power and not an obligation. We expect that those areas with the highest levels of alcohol-related health harm, or fast rising levels of harm from alcohol, will be most likely to use this power. It will

allow local health bodies to fully contribute to local decision making and mean licensing authorities can restrict the number of licensed premises in the local area on the basis of robust local evidence. More information is available in the full consultation document and impact assessment. Do you want to answer questions on health as a licensing objective for cumulative impact policies? Please select one option.

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Yes

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## Page 9: Health as a licensing objective for cumulative impact policies

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Q24. 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):

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The government should make it mandatory for hospitals to provide Emergency Department (ED) assault data to the crime reduction partnerships, as the data is useful (when properly collected). The provision is patchy over the country, due to a variety of reasons. There needs to be investment in IT in ED and countrywide training for ED staff in order to facilitate this.

Data on Alcohol specific hospital admissions in the local area would be useful when developing a CIP based on off-trade to reduce street drinking, for instance in an area with hostels or a housing estate with a street drinking problem.

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Q25. 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.

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Yes

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

If Public Health is to contribute to the evidential base for setting up a Cumulative Impact Areas then this must go into primary legislation not regulation. This is because at appeal the magistrate may just rely on the 4 licensing objectives in primary law.

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Q26. 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 your answer in the box below, providing evidence to support your response (keeping your views to a maximum of 200 words):

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1. The health data (assault) would not add much to the information already available from police data. It would simply triangulate it. However the gravitas of a consultant on Emergency Medicine presenting evidence would influence councillors.
2. On – trade: the health damage recorded in alcohol-related admissions is mainly long term damage – hypertension, cardiac arrhythmias – this is not linked to the night-time economy (assault injuries and drunkenness are). So precise use of types of alcohol related admissions would be necessary.
3. Customers in the city centre night-time economy come from far and wide, so using local alcohol-related admissions for city centre CIA's would not always be appropriate. In Bristol 30% of city centre customers come from outside Bristol.
4. Using local alcohol-specific admissions data in areas that suffered from street drinking would be effective. Many severely dependent drinkers would already have alcohol specific conditions (liver disease etc) that could be quickly worsened by local availability of cheaper strong alcohol.

5. The government should make it mandatory for hospitals to provide ED assault data to the CRP. Provision is patchy over the country due to a variety of reasons.

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Page Score

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## Page 10: Freeing up responsible businesses

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Q27. The government has committed to consult on giving licensing authorities greater freedom to take decisions that reflect the needs of their local community. Following the government's Red Tape Challenge in 2011, three areas of reform were specified: alcohol licensing for certain types of premises providing minimal alcohol sales, temporary event notices (TENs) and the licensing of late night refreshment. This section asks for views on these proposals and suggests further ways to reduce burdens on business. The proposals set out here can be seen alongside work undertaken by the Department for Culture, Media and Sport to remove unnecessary red tape from regulated entertainment. More information on each of these areas for reform is available in the full consultation document. There are five subjects covered in this section. They are: ancillary sales of alcohol, occasional provision of licensable activities at community events, an extension of the temporary event notice limit at individual premises, late night refreshment, and further proposals to reduce burdens on business. Do you want to answer questions on freeing up responsible businesses? Please select one option.

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Yes

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## Page 11: Freeing up responsible businesses

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Q28. Ancillary sales of alcohol For many businesses, the sale of alcohol is only a small part of, or incidental to, their wider activities, and occurs alongside the provision of another product or service (which this consultation refers to as an 'ancillary sale'). For example, a guesthouse might wish to provide wine to its guests with an evening meal or a complimentary bottle of wine in a guest's room, while a hairdresser might wish to offer clients a glass of wine. 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 meet certain qualification criteria for limited or incidental sales? Please select one option in each row.

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	Yes	No	Don't know
The provision should be limited to a specific list of certain types of business and the kinds of sales they make		X	
The provision should be available to all businesses providing they meet certain qualification criteria to be an ancillary seller		X	
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 the above options		X	

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Q29. If special provisions to reduce licensing burdens on ancillary sellers were to include a list of certain types of business, do you think it should apply to the following? Please select one option in each row.

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	Yes	No	Don't know
Accommodation providers, providing alcohol alongside accommodation as part of the contract		X	
Hair and beauty salons, providing alcohol alongside a hair or beauty treatment		X	
Florists, providing alcohol alongside the purchase of flowers		X	
Cultural organisations, such as theatres, cinemas and museums, providing alcohol alongside cultural events as part of the entry ticket		X	
Regular charitable events, providing alcohol as part of the wider occasion		X	

Score

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Q30. 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:

Ancillary sellers should not be selling alcohol in the first place. Do not allow it. There is a plethora of ancillary sellers already and it is totally inappropriate. The problem with relaxing the rules for (eg) hair salons, cinemas, charities etc, is that it provides loopholes for imaginative exploitation. Do not allow any special provision.

Q31. 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. Alternatively, a second option is to broaden the definition of 'ancillary sales' to include all businesses (and/or not for profit activities) through the use of a general set of qualification criteria, for example, to the effect that: alcohol must be sold or supplied as a small part or proportion of a sales transaction or contract for a wider service, and the amount of alcohol that could be supplied as part of that contract cannot exceed a prescribed amount. Do you think that the qualification criteria proposed meet this aim?

Don't know

**Please use the space below to provide further comments (keeping your views to a maximum of 200 words):**

This is a leading question, as we disagree with the whole premise of 'ancillary sellers'. See Q 22. Do not allow any special provision.

Score

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Q32. 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
Allow premises making ancillary sales to request in their premises licence application that the requirement for a personal licence holder be removed			X
Introduce a new, light-touch form of authorisation for premises making ancillary sales - an ASN but retaining the need for a personal licence holder			X
Introduce a new, light touch form of authorisation for premises making			X

**ancillary sales - an ASN - with no requirement for a personal licence holder**

Score

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Q33. Do you think these proposals would impact adversely on one or more of the licensing objectives?  
Please select one option.

Yes No Don't know

**Allow premises making ancillary sales to request in their premises licence application that the requirement for a personal licence holder be removed**

X

**Introduce a new, light-touch form of authorisation for premises making ancillary sales - an ASN but retaining the need for a personal licence holder**

X

**Introduce a new, light touch form of authorisation for premises making ancillary sales - an ASN - with no requirement for a personal licence holder**

X

Score

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Q34. 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 response to a maximum of 200 words:

The problem with allowing ancillary seller status is that it will:

1. Further 'normalise' the consumption of alcohol as ancillary to a host of commercial transactions.
2. Be corrupted as a loophole by people who want to sell alcohol in an irresponsible way.
3. Will greatly increase the burden on enforcement.

Page Score

0

## Page 12: Freeing up responsible businesses

Q35. 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

Score

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Q36. 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

**Reduce the burden**

X

**Increase the burden**

X

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Page Score

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## Page 13: Freeing up responsible businesses

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Q37. Should the number of TENs which can be given in respect of individual premises be increased?  
Please select one option.

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No

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Q38. If you answered yes, please select one option to indicate which you would prefer. Please select one option.

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*No Response*

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## Page 14: Freeing up responsible businesses

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Q39. 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.

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	Yes	No	Don't know
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Determining that premises in certain areas are exempt		X	
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Determining that certain premises types are exempt in their local area		X	
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Q40. 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.

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No

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Q41. Please describe in the box below any other types of premises to which you think a nationally prescribed exemption should apply (keeping your views to a maximum of 100 words).

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No comment

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Page Score

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## Page 15: Freeing up responsible businesses

Q42. Do you agree with each of the following proposals? Please select one option in each row.

	Yes	No	Don't know
Remove requirements to advertise licensing applications in local newspapers		X	
Remove the centrally imposed prohibition on the sale of alcohol at MSAs for the on and off-trade		X	
Remove the centrally imposed prohibition on the sale of alcohol at MSAs, but only in respect of overnight accommodation - lodges	X		
Remove or simplify requirements to renew personal licences under the 2003 Act		X	
Score			
0			

Q43. 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
Remove requirements to advertise licensing applications in local newspapers			X
Remove the centrally imposed prohibition on the sale of alcohol at MSAs for the on and off-trade			X
Remove the centrally imposed prohibition on the sale of alcohol at MSAs, but only in respect of overnight accommodation - lodges			X
Remove or simplify requirements to renew personal licences under the 2003 Act			X
Score			
0			

Q44. Do you think that the following measures would impact adversely on one or more of the licensing objectives (see glossary)? Please select one option in each row.

	Yes	No	Don't know
Remove requirements to advertise licensing applications in local newspapers		X	
Remove the centrally imposed prohibition on the sale of alcohol at MSAs for the on and off-trade	X		
Remove the centrally imposed prohibition on the sale of alcohol at MSAs, but only in respect of overnight accommodation - lodges		X	
Remove or simplify requirements to renew personal licences under the 2003 Act	X		
Score			
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Q45. 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 keep your views to a maximum of 200 words.)

Alcohol should not be sold in motorway service areas at all.  
Alcohol should not be sold on trains at all.

Page Score

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## Page 16: Impact assessments

Q46. Impact assessments for the proposals in this consultation have been published alongside the full consultation document. 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
Minimum unit pricing		X	
Multi-buy promotions			X
Health as a licensing objective for cumulative impact			X
Ancillary sales of alcohol			X
Temporary event notices			X
Late night refreshment			X
Removing the duty to advertise licence applications in a local newspaper			X
Sales of alcohol at motorway service stations			X
Personal licences			X

Score

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Q47. Do you have any comments on the methodologies or assumptions used in the impact assessments? If yes, please specify in the box below, clearly referencing the impact assessment and page to which you refer (keeping your views to a maximum of 400 words).

The IA for minimum unit price for alcohol misses out the effect on severely dependent drinkers, and the resulting effect on specialist substance misuse services, primary and secondary care. Page 4 paragraph A2.

Severely dependent drinkers will not be able to afford alcohol and may go into withdrawal. Bristol street drinkers drink between 100 and 400 units/ w (exceptionally 700 unit/w). At 45p/unit that will cost them £45 - £180 (exceptionally £315). They will run out of dole money in a couple of days, and then they could develop Delirium Tremens, start fitting, etc (risking brain damage and death). Primary care use, ED attendance and hospital admissions for emergency detoxs will increase. Street drinkers often chose alcohol over food, getting their calories from alcohol instead so we can expect an increase in malnutrition in the cohort as well. The Department of Health must develop a strategy to address this as local specialist substance misuse services may well be overwhelmed in the short term.

This is not a reason not to bring in a minimum unit price, but the NHS must set out plans to assist the most vulnerable.

Page Score

## Scoring Summary

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5. A ban on multi-buy promotions in the off-trade	0
6. Reviewing the mandatory licensing conditions	0
7. Reviewing the mandatory licensing conditions	0
8. Health as a licensing objective for cumulative impact policies	0
9. Health as a licensing objective for cumulative impact policies	0
10. Freeing up responsible businesses	0
11. Freeing up responsible businesses	0
12. Freeing up responsible businesses	0
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14. Freeing up responsible businesses	0
15. Freeing up responsible businesses	0
16. Impact assessments	0
<b>Total Survey Score:</b>	0