

Alcohol strategy consultation

User Details - 5456247

Date Started: 04/02/2013 15:18:16

Date Ended: 06/02/2013 15:19:00

Time taken: 48 hrs, 0 mins, 44 secs

IP Address: n/a

Unique ID: n/a

Page 1: About you

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

No Response

Score

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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.

Voluntary and community organisation

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

This submission is on behalf of the Baptist Union of Great Britain, the Methodist Church and the United Reformed Church. These three Christian denominations work together on social justice issues as the Joint Public Issues Team www.jointpublicissues.org.uk

Score

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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.

500000

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.

Our churches have extensive experience of helping victims of alcohol misuse and campaigning for the effective regulation of the alcohol industry. We are not 'anti alcohol' but believe that there is a responsibility on individuals and the industry to ensure that the potential harm caused by problem drinking is limited. Our understanding has been shaped by this history of engagement and our denominations have made various corporate statements. A recent report by the Methodist Church summarising these viewpoints is http://www.methodist.org.uk/downloads/pi_onetoomany_1009.pdf

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

No Response

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

No Response

Score

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

No Response

Score

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Page Score

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Page 2: A minimum unit price for alcohol

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.

Yes

Score

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Page Score

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Page 3: A minimum unit price for alcohol

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.

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):

MUP at 45p or more is a targeted measure, as it will particularly affect the drinking choices of those who use dangerously cheap and strong alcohol. Alternative suggestions, such as a general rise in duty on alcohol, are far less targeted and open to the charge of penalising the average responsible drinker. It is important to realise that MUP specifically targets problem drinking that leads to serious health harms, especially among young, heavy drinkers. MUP at 45p would have some effect on problem drinking, but 50p would be more effective while remaining proportionate. As referenced in the Alcohol Health Alliance's response to this consultation, a MUP of 50p has the potential to prevent 31,000 alcohol-related hospital admissions, 1,000 deaths and 18,000 crimes. Likewise, the research conducted by SCHARR found that after 10 years a 45p MUP would save 2040 lives but 50p would save 3060.

Score

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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):

Scotland is already working to introduce MUP at 50p and Northern Ireland and the Republic of Ireland are working towards a cross-border alcohol strategy. It is logical that all nations in the UK set a consistent price - to disincentivise illicit cross-border trade - to underline each nation's commitment to put their alcohol strategy on a firm evidence-base informed by medical research. The authoritative research on the effect of MUP at different levels, as applicable to England and Wales, was conducted in 2008. Since then prices have risen so the required MUP needs to be revised upwards. Sections of the alcohol industry have suggested that a 'sunset clause' be introduced. But it is important that sufficient time is allowed for MUP to be implemented and for studies to be carried out. It would be a serious mistake to introduce a MUP that was too low (and therefore less effective), with a short sunset clause. We would strongly suggest that if a sunset clause is introduced, it should be no shorter than 10 years to allow medical and other evidence to be evaluated.

Score

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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 automatically be updated in line with inflation each year

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):

MUP will have positive impacts on: Communities: many town centres become no go areas due to alcohol-related violence. Those on low incomes: the harm caused by problem drinking hits disadvantaged communities hardest due to higher alcohol-related death rates and the financial impact of alcohol addiction. Children: alcohol misuse is implicated in the parental abuse and neglect of children. In addition, parents model drinking behaviours to children and young people are sensitive to pricing mechanisms at a formative time in their drinking habits. Frontline workers: problem drinking leads to violence against police and medical staff and disproportionate burdens on resources.

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Page Score

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.

Yes

Score

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Page Score

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

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

Yes

Score

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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.

Yes

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

Incentives which businesses offer to consume excessive alcohol, or to encourage consumers to purchase more than they would otherwise want or need, should be unacceptable. There are various ways this can be done in addition to multi-buy deals, such as through reward schemes using vouchers or cards

Score

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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.

Yes

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

Minimum unit pricing and a multibuy ban are both welcome policies because they address distortions that have entered the alcohol market. MUP targets the harm caused by particularly cheap, strong alcohol that is a danger to hazardous and harmful drinkers. Multibuy discounts affect the ability of supermarkets to use alcohol as part of competition which in turn supports a binge drinking culture. Banning multibuy promotions should be seen as an addition to MUP at the correct level, not a compensation for a MUP level that is too low. The specific reasons it should be introduced as well as MUP are: -multibuy and loss-leader deals promote drinking culture. Balance NE and Alcohol Concern's 2012 report 'Binge' showed that 16-17 year olds, a particularly vulnerable group, believe promotions encourage greater levels of drinking -as quoted in the Alcohol Health Alliance's submission, a 2012 update for Scotland of the original SCHARR modelling in support of MUP showed that a multibuy ban would save further lives, and lead to additional falls in hospital admissions, alcohol-related crimes and work absences.

Score

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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.

Yes

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

All the groups mentioned in the answer to Q4 above would be benefit from banning multibuys, particularly -young people, as multibuy discounts give them strong incentives to 'pre-loading' -children of dependent parents. The Government's child poverty strategy assumes a link between poverty and alcohol dependence. We challenge the view that this is a simple causal link, as those in poverty drink significantly less than other economic groups. Nevertheless it is vital to protect children of problem drinkers in all income brackets from neglect and abuse.

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Page Score

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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.

Yes

Score

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Page Score

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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	Yes	Yes	Yes
Dispensing alcohol directly into the mouth	Yes	Yes	Yes	Yes
Mandatory provision of free tap water	Yes	Yes	Yes	Yes
Age verification policy	Yes	Yes	Yes	Yes
Mandatory provision of small measures	Yes	Yes	Yes	Yes

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.

No

If no, please state what more could be done in the box below (keeping your views to a maximum of 100 words):

For similar reasons to the call for a ban on multibuy discounts, promotions in pubs and clubs which encourage excessive consumption such as happy hours or discounts for buying larger drinks, are undesirable -they promote pubs and clubs as environments to get dangerously intoxicated -pricing strategies based on competition between rival establishments in local areas are likely to increase health harms and social disorder

Score

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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.

Yes

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

One of the changes in alcohol retail in recent years has been the trend to larger glass sizes and larger measures for spirits. Mandatory licensing conditions should ban: -Deals which encourage the purchasing of larger sized drinks -Other disincentives to responsible drinking like the excessive price of soft drinks and bottled water in many licensed establishments. Soft drinks and water should never be more expensive than the cheapest drinks in pubs/clubs

Score

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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.

No

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

We would argue that a ban on irresponsible promotions should apply to both the offtrade and the ontrade. It is also important to ensure that local communities have sufficient powers limit the harm caused by problem drinking. There is a strong case for including a public health responsibility in the mandatory licensing conditions if this does not appear elsewhere.

Score

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Page Score

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

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.

Yes

Score

0

Page Score

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

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):

Our churches are in sympathy with the recommendations made in the Alcohol Health Alliance on data relevant to a Joint Strategic Needs Assessment. Problem drinking causes numerous problems in local communities. A YouGov poll commissioned by the Methodist Church in 2011 found that 61% of respondents felt there was a problem with excessive alcohol consumption in their area. It is important that communities have the power to limit the number of outlets of potentially harmful businesses and their conditions of trade. The voluntary arrangements of the Responsibility Deal on their

own cannot be relied on to achieve this.

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.

Yes

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

Although saturation of licensed premises may adversely affect local communities in health and social terms, this will be harder to verify from locally-based public health data. Therefore, cumulative health impact should cover a broader geographical area. The Alcohol Health Alliance have identified a district or borough-wide scope. We would support this and add that regional assessment should be integrated with local alcohol strategies.

Score

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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):

No Response

Page Score

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Page 10: Freeing up responsible businesses

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.

Yes

Score

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Page Score

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Page 11: Freeing up responsible businesses

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.

No Response

Score

0

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.

No Response

Score

0

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:

No Response

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?

No Response

Score

0

Q32. Do you think that these proposals would significantly reduce the burdens on ancillary sellers? Please select one option in each row.

No Response

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			
0			

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:

Removing the need for a personal licence holder would remove a major incentive for businesses to display responsibility to local residents. The personal licence holder is the first point of contact for licensing issues and for police enquiries.
 Removing the need for a premises licence would be highly unwelcome to those who might be affected by or might wish to object to a licensing application.
 There may be areas where a lighter touch is appropriate, but this has not been established and the two options mentioned here do not warrant it.

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.

No Response

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.

No Response

Score
0

Page Score
0

Page 13: Freeing up responsible businesses

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

No

Score
0

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

No Response

Score

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Page Score

0

Page 14: Freeing up responsible businesses

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.

No Response

Score

0

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.

No Response

Score

0

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).

No Response

Page Score

0

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

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Q43. Do you think that each of the following would reduce the overall burdens on business? Please select one option in each row.

No Response

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.)

No Response

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.

No Response

Score

0

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).

No Response

Page Score

Scoring Summary

Pages	Total
1. About you	0
2. A minimum unit price for alcohol	0
3. A minimum unit price for alcohol	0
4. A ban on multi-buy promotions in the off-trade	0
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
13. Freeing up responsible businesses	0
14. Freeing up responsible businesses	0
15. Freeing up responsible businesses	0
16. Impact assessments	0
Total Survey Score:	0