

# Alcohol strategy consultation

User Details - 5472638

Date Started: 06/02/2013 11:14:31

Date Ended: 06/02/2013 11:51:09

Time taken: 36 mins, 38 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

0

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

Licensing authority

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

Portsmouth City Council

Score

0

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.

No Response

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.

Undertook a workshop event hosted by the Safer Portsmouth Partnership (SPP) which involved responsible authorities, Members of the Licensing Authority and members of the SPP, including public health.

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

South East England

Score

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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

Score

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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 Score

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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.

Yes

Score

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Page Score

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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.

No

***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):***

During our consultation workshop the majority view was that a minimum price would not achieve the aims it was intended to. There was some agreement that a minimum price might have some limited impact on younger drinkers, but not others. There were concerns that a minimum price would encourage the illicit trade in alcohol. It might also see the re-emergence of the booze cruise, with people taking vans to the

continent to buy cheaper alcohol. A concern was also raised that a minimum price would lead to an increase in crime due to thefts of alcohol. A minimum price could push up the price of premium brands, who want to keep a differential with the lower quality drinks. Thus 'responsible' drinkers would be further punished. The only dissenting view, a minority view, came from officers with a 'health' remit, who felt a 50p per unit price would be more effective in reducing alcohol related harm, in line with the Sheffield research and the proposed MUP in Scotland.

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):**

The workshop felt that a more comprehensive approach was needed to tackle alcohol related harm, this should include: • A review and much stronger restrictions on the advertising of alcohol • Use of strong health awareness campaigns - such as the cancerous lung on smoking packaging. • Advertise Health initiatives that target everyone, not just younger binge drinkers • Consider availability and number of off-licences in certain areas

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 be reviewed after a set period

Score

0

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):**

The majority view was that people that would be unfairly impacted would be: • Responsible drinkers that are not affluent will have to pay more • The Lower paid • Those on benefits. There was a concern that a MUP could drive up crime, particularly thefts from shops and illicit sales of alcohol. Charities/events that serve alcohol as part of the event, would they have to pay higher prices to then sell on?

Score

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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.

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

0

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):***

This proposal had broad agreement, although it was felt that a minimum price would take care of the retailing of cheap alcohol, so this might not be necessary. It was felt that companies will find a way around this using other marketing tools (i.e. discount vouchers on future purchases) the workshop felt controls would need to be put in place to prevent companies from doing this. Any scheme which uses incentives for the purchase of alcohol. Loyalty Schemes offering (extra) points for alcohol purchases. Money off coupons for next purchase of 2 bottles/packs. Should discounts on alcohol be considered, as these could be used instead of multi-buys?

Score

0

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):***

Cost of enforcement – which authorities will be responsible? (limited resources in public sector) Ability to enforce - it may be too complex. Seek supermarkets to set their promotions set at HO level only, no local discretion or ability locally to offer discounts - this would help with enforcement. Put legislation in place to set prices across UK. How would this impact wholesalers / cash and carry stores? Many individuals can get cards to these stores, would this be a loophole?

Score

0

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):*

Community groups/ charities that sell at events - will this restrict their ability to buy cheaper in bulk?  
Students and low paid families Potential impact encouraging booze cruises , financial impact on spend within UK?

Score

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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 promotions a ban on dispensing alcohol by one person directly into the mouth of another a requirement to provide free tap water on request to customers a requirement to have an age verification policy to prevent the sale of alcohol to persons under 18 years of age, and a 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

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

Score

0

Q20. Do you think that the mandatory licensing conditions do enough to target irresponsible promotions in pubs and clubs? Please select one option.

Yes

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

General discussions within all groups acknowledged that whilst it is an offence to serve someone that is drunk, in practice it is very difficult to enforce this provision.

Score

0

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):***

It is our collective view that training, for all staff that sell alcohol should be mandatory. There should be a minimum standard of training (perhaps online) that staff should complete. This would include age verification, selling to drunks etc. Retailers should be able to evidence that their staff have completed this training, the training could meet a minimum agreed standard (by way of a Code of Practice) or perhaps validated through a short online test

Score

0

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.

Yes

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

Suggest additional condition = Training Minimum level should be completed as part of conditions

Score

0

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

0

## 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):

Data from hospitals could be used, this would include alcohol related hospital admissions and A&E attendances (including assault data), although hospitals would have to improve their data collection and recording systems to fully support this.

Health should be the 5th licensing objective.

In order to be effective and withstand legal challenge, data needs to be reliable and accurate as possible and close working relationships and buy-in / support from Public Health is essential.

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):***

Clear guidance would be needed for all parties to determine the data that could be used and how it could be used. Could health data on its own be used to determine a policy?

Score

0

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):

This will provide additional data and context for an authority to consider when making decisions about policy areas.

## 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

0

## 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.

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

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.

	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

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:

The majority view arising from the workshop was that any sale by retail of alcohol should be subject to regulatory control and that relaxation of the current position was not supported.

It was envisaged that a general criteria could be open to interpretation and potential creation of loopholes.

Can be seen as mixed message as regards relaxing controls over sales of alcohol when the government's current strategy is to tackle problems with the supply of alcohol.

Reduction of burden not sufficient grounds to remove licensing controls

The consensus view was that there should be no relaxation of policy in this area.

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

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

Our view was that this proposal leaves huge loopholes businesses will seek to manipulate and that it increases availability of alcohol without licensing objectives being applied. Such a change further normalises the consumption of alcohol on a regular basis, i.e. do we really need alcohol when getting a hair cut?

Score

0

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

<b>Allow premises making ancillary sales to request in their premises licence application that the requirement for a personal licence holder be removed</b>	X		
<b>Introduce a new, light-touch form of authorisation for premises making ancillary sales - an ASN but retaining the need for a personal licence holder</b>	X		
<b>Introduce a new, light touch form of authorisation for premises making ancillary sales - an ASN - with no requirement for a personal licence holder</b>	X		

Score

0

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
<b>Allow premises making ancillary sales to request in their premises licence application that the requirement for a personal licence holder be removed</b>	X		
<b>Introduce a new, light-touch form of authorisation for premises making ancillary sales - an ASN but retaining the need for a personal licence holder</b>	X		
<b>Introduce a new, light touch form of authorisation for premises making ancillary sales - an ASN - with no requirement for a personal licence holder</b>	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:

Are we normalising alcohol consumption in everyday situations when alcohol is not really required?  
What are the risks of loopholes?

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

Score

0

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
<b>Reduce the burden</b>	X		

Increase the burden

X

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

0

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.

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

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

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 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

0

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.)

Some of these changes may well reduce the burden on businesses, however they will significantly increase the burden on enforcement authorities. What provision is there to support these authorities with this increased burden?

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

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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).

*No Response*

Page Score

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## Scoring Summary

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