

We welcome the opportunity to respond to the Home Office consultation 'Delivering the Government's policies to cut alcohol fuelled crime and anti-social behaviour'.

Consumed responsibly, alcohol can be enjoyed as part of a healthy balanced lifestyle and the majority of our customers buy it as part of the weekly family shop. However, we know our customers are concerned about excessive drinking and its impact on health and society. Tesco shares this concern.

Tackling a societal problem requires a co-ordinated approach with everyone participating – individuals, government, health professionals, schools, police, manufacturers, the on and the off trade. As an alcohol retailer we too have a responsibility and our customers expect us to play our part. We do this through:

### **Selling alcohol responsibly**

Tesco clearly communicates to customers that alcohol is a product for adults and we have strong systems in place to ensure we do not sell to underage customers through 'Challenge 25'.

### **Giving our customers the information they need to make responsible choices**

Tesco was the first supermarket to introduce labels showing the units of alcohol in our own-brand alcohol and over 90% of our own brand lines now have front of pack unit information.

### **Supporting industry-wide initiatives**

Recognising that we cannot tackle alcohol misuse alone, we participate in the Campaign for Smarter Drinking and are the lead retail partner with Drinkaware's consumer campaign 'Why let the good times go bad?'

### **Increasing our range of lower alcohol products**

We have signed up to all relevant Public Health Responsibility Deal pledges, including pledging to play our part with the rest of the industry to remove one billion units from the market annually from 2015 onwards. We will increase our range of low and mid strength beers, grow our offer of lower alcohol wines and reduce the ABV (alcohol by volume) of beer and cider where possible.

### **Helping to tackle problem drinking in local communities**

We are involved in 31 Community Alcohol Partnerships throughout the UK where we work collaboratively with local agencies and offer our industry leading training on responsible alcohol sales to small independent traders.

We have set out our thoughts on the specific parts of the consultation in more detail below.

### **Minimum Unit Pricing**

We have been consistent in our support for constructive engagement with government on minimum unit pricing since 2010. It remains our view that, if the measures have the desired effect of helping to reduce harmful drinking, then it is

worthwhile, regardless of the impact on sales. This reflects our view that, while it is too simplistic to apportion responsibility for problem drinking to the price of alcohol alone, we do recognise there has been considerable and legitimate debate about the correlation between the price of alcohol and its consumption.

We believe that the level of a minimum price is a matter for government to decide, although it is important that any price does not penalise the majority of responsible customers. Additionally, as a national business with stores across the UK, we would welcome co-ordination in applying the same minimum price across England, Scotland, Wales and Northern Ireland. This would make the operation and implementation of the measure less burdensome for retailers delivering the policy, for example in the changes we would need to make to IT systems and customer communications, and would enable consistent monitoring of the measure's impact, including on cross border trade.

As the impact of a minimum unit price in the UK is as yet unknown, we believe that a sunset clause should apply to allow the opportunity to review its impact. This is in place in the Scottish legislation.

### **Promotions**

Our customer data show that customers use promotions to offset future purchases, to trade up to premium brands, or to try something new. The buying patterns of our customers therefore do not support the view that promotions cause a spike in consumption.

Analysis conducted by NHS Scotland on the introduction of a quantity discounts ban, in place since October 2011, also suggests that a ban does not have a significant impact on sales. The small reduction in off-trade alcohol sales in Scotland since the introduction of the quantity discount ban (0.5%) is mirrored in England and Wales where no ban was introduced.

Taking into account our customer data and the evidence from Scotland, we do not therefore see a case for introducing an additional ban on multibuy promotions. In addition, with a minimum unit price in place, there would be no need for a ban.

### **Tackling alcohol misuse in communities**

We are committed to tackling problem drinking in the communities we serve which is why we are strong supporters of CAPs. We believe Community Alcohol Partnerships deliver extremely effective local approaches to tackling anti-social drinking, and have been particularly effective in discouraging under age sales.

We participate in 31 Community Alcohol Partnerships and believe their approach of bringing together key stakeholders in the community, from police and education authorities to trading standards and of course retailers themselves, is the most effective means of dealing with localised problems through targeted intervention. The use of CAPs means that the challenges in a particular community can be addressed on a bespoke basis.

There is a strong evidence base to support the CAP approach. In 2009, Kent County Council launched a pilot CAP in three areas - Edenbridge, Thanet and Canterbury. Independent evaluation by Kent University found that criminal damage was reduced by 43% in Edenbridge, 36% in Thanet and 16% in Canterbury. Public perception surveys also showed positive results on six identified measures: teenagers hanging around; people drunk and rowdy in public places; vandalism & graffiti; rubbish & litter; drugs; and anti-social behaviour.

In addition, London Metropolitan University conducted an evaluation of the Islington CAP, the first established in central London, in which Tesco was the lead retailer. The evaluators concluded that "there is considerable scope for rolling the initiative out across the borough as a whole. The experience is there, the training and promotional materials have been developed, and the lessons learnt can easily be transferred...the experience of the pilot project suggests that it is a good investment which may well lead to longer term savings across a wide variety of areas currently affected by youth alcohol consumption including crime, enforcement, health, and youth disengagement in general."

The evaluation showed that, at the start of the CAP, 58% felt that young people drinking and being rowdy in public places was a problem; this fell to 37% at the end of the CAP period. Calls about young people and alcohol to the Homes for Islington helpline fell by 58% during the CAP period. At the start of the CAP period, 37% of test purchases were failed by retailers; at the end of the CAP period all test purchases were passed.

We are concerned that a cumulative approach to licensing could restrict competition and choice for customers, particularly in more deprived areas. A decision not to grant an additional licence could give the unintended consequence of making a new grocery store financially unviable. This would mean that a community would lose out on convenient access to high quality foods and also the broader benefits of a new store – jobs, investment and regeneration.

With regards to the possible introduction of a cap on the number of licensed premises in an area, it is important to note that our stores are not only off licences. Alcohol is a relatively small part of our overall offer to customers (typically 10% of turnover) with our primary offer being high quality, good value food, including an extensive range of fresh fruit and vegetables. This is true of all our stores, including our smaller Express shops and our larger stores - which can draw customers from a wide geographical area.

Ministers may wish to consider whether stores that only sell alcohol should be treated separately from stores that have alcohol as a relatively low part of their overall customer offer. If government does decide to allow local authorities to pursue further cumulative impact zones, we would ask that there is clarity with regards to each zone's strategy, purpose and boundaries. We would also ask that government considers the action businesses are taking to help tackle alcohol misuse,

for example participating in CAPs or the PHRD, when setting out how cumulative impact licensing will work so that responsible retailers are not 'punished.'

### **Red Tape Challenge**

It is important that alcohol is sold responsibly. However, we welcome the government's commitment to reducing unnecessary bureaucracy. This provides an opportunity to examine processes to see whether they can be improved or streamlined, particularly in light of new technology.

Broadly, we would welcome more consistency across licensing boards. We find that some reviews by local licensing authorities can be avoided through early discussions with us to highlight any concerns or feedback about our processes. Some boards are extremely consultative and keen to do this whereas others progress straight to reviews. Encouraging boards to engage in constructive discussions with licensed premises earlier would save licensing authorities both time and cost. It would also mitigate against unnecessary licence reviews based on spurious data, which in our experience is possible. For example, some licensing boards and policing authorities link crime and disorder to thefts from our stores that are not alcohol related such as thefts of higher value items such as fresh meat or electrical.

More specifically, we would suggest that the Licensing Act 2003 is amended so that 'original' licences do not need to be submitted with different types of applications. To illustrate, as we need the original licence to complete variations of licences, we have to arrange for a copy of the licence to be certified by a solicitor, adding cost and bureaucracy. And, while we can submit applications through [www.gov.uk](http://www.gov.uk), we still need to send the 'original' licence back to each authority, eradicating the efficiency saving made through using the website.

We would be pleased to discuss any area of our response further with relevant officials.