



Association of Directors of Public Health – response to consultation on the Alcohol Strategy and delivering the Government’s policies to cut alcohol fuelled crime and anti-social behaviour

The Association of Directors of Public Health (ADPH) is the representative body for Directors of Public Health (DsPH) in the UK. It seeks to improve and protect the health of the population through DPH development, sharing good practice, and policy and advocacy programmes. www.adph.org.uk

ADPH has a strong track record of collaboration with other stakeholders in public health, including those working within the NHS, local authorities and other sectors.

Overview

The Association of Directors of Public Health believes that:

- a reduction in alcohol consumption at population level is needed, with UK government strategies, legislation and regulation to reduce alcohol-related harm;
- there should be greater consideration of public health and levels of alcohol-related harm when processing licensing applications;
- national policies should support partnership working to ensure implementation of existing laws on sales of alcohol including to those underage, supported by the introduction of education on alcohol-related issues at a younger age;
- a minimum unit price for alcohol of *50p (at 2009 prices) is required, with no alcohol sold at less than *50p per unit (index linked). In a survey conducted by ADPH in December 2009, 83% of Directors of Public Health said that lobbying for a minimum price of *50p per unit of alcohol was one of their top priorities. [*It should be noted that due to inflation since the ¹SchARR (University of Sheffield) model in 2009, this figure is now equivalent to 54p];
- detrimental cross border issues will arise if the minimum unit price for alcohol in England is set at 45p whilst the Scottish Government is proposing a 50p minimum unit price. A price differential will encourage people to visit England to purchase and consume alcohol, potentially negating the effectiveness of the minimum unit pricing policy;
- the minimum unit price level should be kept under review in relation to changes in the evidence base for alcohol related harm - if evidence shows greater impact at higher prices the unit price should be increased accordingly;
- measures should be developed that narrow the gap between the on-trade and supermarkets/other off-trade;
- the Public Health Outcomes Framework should give more support to outcome-focused delivery in relation to alcohol related harm.

ADPH response to specific consultation questions

Consultation Question 1:

Do you agree that this MUP level would achieve these aims?

Yes

No

Don't Know

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).

Evidence strongly suggests setting the minimum unit price level at *50p (*at 2009 prices – now equivalent to 54p). This would achieve far better outcomes than the proposed 45p price level.

The ¹SchARR model, which is the only UK independently peer reviewed evidence base for minimum unit pricing, found that, after 10 years a *50p price level would save:

- **3,060 lives**, 1,020 more than 45p level;
- **97,700 hospital admissions**, 31,500 more than 45p level;
- **442,300 days absent from work**, 176,000 more than 45p level;
- **42,500 crimes**, 18,400 more than 45p price level.

These are significant savings of lives, for society and the economy and only cost the moderate drinker 6p per week more than a 45p minimum price level.

In a survey conducted by ADPH in December 2009, 83% of Directors of Public Health said that lobbying for a minimum price of *50p per unit of alcohol was one of their top priorities.

*[at 2009 prices. It should be noted that due to inflation since the SchARR (University of Sheffield) model in 2009, this figure is now equivalent to 54p].

Consultation Question 2:

Should other factors or evidence be considered when setting a minimum unit price for alcohol?

Yes

✓

No

Don't Know

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

- Pubs, bars and other on-trade premises will greatly benefit from a minimum price as it would reduce the differential in prices retailed in the off-trade and on-trade. Evidence suggests that this would result in a shift of drinking patterns to on-trade premises which is a safer, regulated environment to consume alcohol and positive for community pubs.
- Inflation since the ¹SchARR model was published in 2009 means that 50p is now valued at 54p. Minimum unit pricing's success should be measured against revised levels when this policy is implemented.
- Because dependent drinking is concentrated in deprived areas and minimum pricing will reduce the heaviest drinking, then there is a likely positive impact on health inequalities¹.
- The Scottish Government is proposing a 50p minimum unit price creating serious cross border issues if the price is 45p in England. Setting the level at 45p will create a price differential which will encourage people to visit England to purchase and consume alcohol, potentially negating the effectiveness of the minimum unit pricing policy.
- The price level should be regularly revised to ensure that alcohol doesn't get more affordable.
- Additional money earned by retailers should be recouped by the Treasury and directed to local services which reduce alcohol harm.

Consultation Question 3:

How do you think the level of minimum unit price set by the Government should be adjusted over time?

Do nothing – the minimum unit price should not be adjusted.

The minimum unit price should be automatically updated in line with inflation each year.

✓

The minimum unit price should be reviewed after a set period.

Don't know.

Consultation Question 4:

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?

Yes ✓

No

Don't Know

If Yes please specify in the box below (keeping your views to a maximum of 100 words).

- Children and young people would be more protected from alcohol harms by reducing access to pocket-money priced alcohol.
- Alcohol would be de-normalised for children, to whom alcohol has become an everyday commodity.
- Frontline workers would benefit from less drunken violence.
- There would be a positive effect on offenders, as 63% are problem drinkers.

Consultation Question 5:

Do you think there should be a ban on multi-buy promotions involving alcohol in the off-trade?

Yes ✓

No

Don't Know

Consultation Question 6:

Are there any further offers which should be included in a ban on multi-buy promotions?

Yes ✓

No

Don't Know

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

- As a general principle, the purchase of any goods should not be linked to the purchase of alcohol at a lower than normal sale price.
- Buying goods and getting alcohol discounted or free which would fall below a minimum unit price of *50p.
- Multi-buy promotions in on-trade premises should end to be consistent with the off-trade.
- There should be a consistency of price per volume of a product regardless of the size or quantity of packaging that alcohol is sold in.
- Loyalty point schemes and money off coupons which are in anyway linked to alcohol.

Consultation Question 7:

Should other factors or evidence be considered when considering a ban on multi-buy promotions?

Yes ✓	No	Don't Know
----------	----	------------

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

- There is a far greater impact of the multi-buy ban policy when enforced alongside a minimum unit price of *50p (at 2009 prices).
- Marketing of alcohol should be legislated for ensuring that it does not circumvent the spirit and intention of this legislation.
- An Alcohol Concern and Balance report of 16-24 year olds found that promotions encouraged more drinking. A multi-buy ban would protect more children and young people.
- Multi-buy promotions encourage people to buy more alcohol than they intend resulting in easier access to alcohol in the home environment. We already know that children access alcohol from the home more than any other place, so a ban would reduce the access to alcohol for children.
- Trading Standards needs a strengthened operation to monitor and enforce a multi-buy ban effectively as it is unlikely that relying on consumers policing the ban will be effective enough.
- In the ²Chief Medical Officer's 2009 report to Parliament, alcohol was named as the most dangerous drug in the UK. Unlike illegal drugs, it is easily accessible and costs as little as 12p/unit.
- Reduced consumption would improve health inequalities as lower income groups suffer greater health harms.

Consultation Question 8:

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?

Yes ✓	No	Don't Know
----------	----	------------

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

There should be a consistency in approach, therefore we would not want to differentiate between groups, however:

- Pubs could benefit as people are less likely to preload on alcohol bought from off-licence premises and shift their consumption of alcohol to on-licence premises.
- Young people will benefit from reduced access and availability of alcohol in the home environment.
- Some of these measures may only be effective alongside minimum unit pricing.
- Public services, such as the NHS, would benefit, as less people would binge drink and pre-load and result in a lower burden upon services.

Consultation Question 9: Do you think each of the mandatory licensing conditions is effective in promoting the licensing objectives (crime prevention / public safety / public nuisance / prevention of harm to children)? Please state Yes / No / Don't know in each box:					
		Prevention of crime and disorder	Public safety	Prevention of public nuisance	Protection of harm from children
A	Irresponsible promotions	Yes	Yes	Yes	No
B	Dispensing alcohol directly into the mouth	Yes	Yes	Yes	No
C	Mandatory provision of free tap water	Yes	Yes	Yes	No
D	Age verification policy	Yes	Yes	Yes	Yes
E	Mandatory provision of small measures	Yes	Yes	Yes	Yes

Consultation Question 10: Do you think that the mandatory licensing conditions do enough to target irresponsible promotions in pubs and clubs?		
Yes	No ✓	Don't Know
<p>If no, please specify in the box below (keeping your views to a maximum of 100 words):</p> <ul style="list-style-type: none"> ○ Remove the 'glamorisation' test for promotions and ban all irresponsible promotions. ○ Remove the 'need to demonstrate a link with crime and disorder' clause relating to irresponsible promotions as it is too restrictive. ○ The unit content of all drinks should be clearly visible at the point of sale so customers know what they are drinking. ○ Age verification schemes should be a minimum 'check 25', have a written policy and include mandatory signage on premises. ○ Licensees should train and re-train their staff to be accredited to a national standard for the safe and responsible retailing of alcohol. 		

Consultation Question 11: Are there other issues related to the licensing objectives (prevention of crime and disorder / public safety / prevention of public nuisance / protection of children from harm) which could be tackled through a mandatory licensing condition?		
Yes ✓	No	Don't Know

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

- A proportionate seating and standing ratio should be dictated by the capacity of the premises.
- Soft drinks should be priced cheaper than the cheapest alcoholic drink to remove the incentive for people to drink alcoholic drinks.
- Beer should be decanted from bottles at the bar. As there are more bottle related incidents involving beer bottles than glasses, the removal of beer bottles from the drinking environment will provide a safer drinking environment.
- A ban on irresponsible drinks promotions should be applied to the off-trade.
- Loyalty point schemes for the purchase of alcohol which encourages increased consumption should be banned.
- Offering shots of spirits away from the bar area (e.g. table to table selling of shots of pre-poured vodka) should be banned.
- Happy hours should be banned as they sell discounted alcohol.
- Organised commercial pub crawls should be banned as they encourage the consumption of excess alcohol in a short space of time which leads to drunkenness and anti-social behaviour.
- Ladies nights, (where there are discounted or free drinks) should be banned as they encourage excessive consumption of alcohol.
- Drinking games should be banned.

Consultation Question 12:

Do you think the current approach, with five mandatory licensing conditions applying to the on-trade and only one of those to the off-trade, is appropriate?

Yes	No ✓	Don't Know
-----	---------	------------

If no, please specify in the box below (keeping your views to a maximum of 100 words):

There should be as many or as few mandatory licensing conditions as deemed appropriate by the Government. This should include extending the ban on irresponsible drinks promotions to cover off-trade licensed premises to create a consistency across the on- and off-trades.

Supermarket alcohol sales now account for 70% of off-trade sales and can sell alcohol at discounted prices. Stopping irresponsible promotions would also help to tackle pre-loading and binge drinking of alcohol purchased from the off-trade. People who have pre-loaded are more likely to be a victim or perpetrator of crime.

Consultation Question 13:

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.

A robust Joint Strategic Needs Assessment would provide consistency in approach, we recommend that it would include:

- Accident and Emergency data
- Ambulance data
- Paramedic data

- GP data
- Urgent care/walk in centre data
- Treatment data including specialist treatment
- Demand/unmet demand for alcohol treatment
- Alcohol related mortality (including suicides and self harm)
- Mental health and wellbeing indices
- Foetal Alcohol Spectrum Disorders data
- CEM Home Office monitoring data on violence
- Trauma and Injury Intelligence Group data
- Other hospital admissions data NI39 e.g. specific (drunkenness) and non specific (cancers)
- Map out premises and correlate alcohol related admissions
- Domestic abuse data including child protection issues

Public health should be a licensing objective in its own right and not tied to CIPs, this would not be disproportionate as suggested in the impact assessment, and would play a role in the economic development and health of an authority area. Experience from Scotland suggests that public health should be taken into consideration across the whole authority area rather than at smaller scale when assessing the over-provision of alcohol to take into account all points of sale.

Consultation Question 14:

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 ✓	No	Don't Know
----------	----	------------

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

Currently only the police can object to licence applications due to a Cumulative Impact Policies (CIP). We believe that all responsible authorities should be able to object to the application therefore widening the process to consider health data and the impact on health harms. For example if there is a health harm issue but no crime issue, health bodies may object on the grounds of a CIP.

As noted in question 13, public health and assessment of over-provision of alcohol should be considered across the authority area as consideration at ward level can be too insignificant and not take into account sales from neighbouring wards.

Consultation Question 15:

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 in the box below, keeping your views to a maximum of 200 words. Please provide evidence to support your response.

- In addition to the impact on controlling alcohol related crime the health data can impact upon all policy areas and licensing objectives giving stronger evidence and improving the all round data picture to set a baseline and allow for more informed decision making, e.g. alcohol related assaults reporting to A&E but not to the police.
- Including health data in consideration of a CIP would enable local links between alcohol and health harm to be better established.
- There will be a positive impact on people's mental health and wellbeing because there is less violence, improving healthiness of the population, increased life expectancy and increased economic

productivity.

- Where there is a saturation of licensed premises, for example in a city centre, competition drives down the price of alcohol which encourages additional consumption. An authority wide over-provision policy backed by public health would lessen 'competition by price' and so limit availability of alcohol to young people, which is an indicator of harm .
- The World Health Organisation has reported that availability effects levels of harm therefore Licensing Authorities should be able to control the availability of alcohol.

Consultation Question 16:

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
A.	The provision should be limited to a specific list of certain types of business and the kinds of sales they make.			<i>See below</i>
B.	The provision should be to all businesses providing they meet certain criteria to be an ancillary seller.		No	
C.	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 options A and B.		No	

As a matter of principle, we do not believe that there should be any reduction in the regulation of alcohol.

Consultation Question 17:

If special provision to reduce licensing burdens on ancillary sellers were to include a list of certain types of premises, do you think it should apply to the following? (Please select one option in each row):

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

Consultation Question 18:

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):

In principle, we disagree with the 'need to free up business' in relation to alcohol. It should not be treated as an everyday, ordinary product.

- Any sale of alcohol should be regulated. Therefore there are no types of premises for alcohol sales which should be unregulated. Unregulated alcohol sales would create a situation where the objectives of the Licensing Act 2003 would be unenforceable.
- The licensed sale of alcohol also protects and ensures a standard of 'due diligence' is adhered to by people selling alcohol.
- This proposal would create a third tier of licensed premises as it would create a category outside Early Morning Restriction Orders/Late Night Levy and CIPs. This would create confusion for consumers and enforcement officers and lead to increased costs for public sector organisations dealing with the harmful effects of alcohol.
- This extra category of licensed premises could be contributing to the harm of excessive alcohol consumption but would not contribute to the costs, for example through a Late Night Levy being applied to licensed premises.

Consultation Question 19:

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 (see paragraphs 9.2 and 9.3). Do you think that the qualification criteria proposed in paragraph 9.6 meet this aim? (Please select one option):

Yes

No ☒

Don't Know

If no, please specify in the box below (keeping your views to a maximum of 200 words).

We don't agree with the 'ancillary seller' status because there is no mechanism to police these businesses, and ensure that they retail alcohol responsibly.

The scheme would also take the sale of alcohol out of the remit of the four objectives of the Licensing Act 2003 and the proposed objective of 'Public Health' thus undermining the Licensing Act.

The 'ancillary sellers' of alcohol in the retail environment would not come under the same protection afforded by the Licensing Act or necessarily receive appropriate training therefore creating a three tier system which cannot be monitored, supported or enforced.

In addition people purchasing from an 'ancillary seller' need to understand they are purchasing from an unregulated 'ancillary seller' and are therefore not necessarily making a reputable or safe purchase, for example safeguarding underage sales.

This provision represents a real risk that alcohol becomes even more normalised, thus failing to take into account the negative impact it has on society in terms of health harms, crime and disorder and wider societal and economic issues. The provision may force other businesses who provide the same service (e.g. other hairdressers in the same locality) to introduce or increase the provision of alcohol in order to compete.

The opportunities to exploit loopholes in these provisions would be considerable. We are concerned about how a 'small part of', or 'occurs alongside' would be defined in this context, and whom and how premises would be investigated to ensure that they are still eligible to be classed as an ancillary seller.

The Impact Assessment highlights that it is not clear how popular Ancillary Sales Notices would be, raising the possibility that there will be a significant increase in the number of businesses who apply for and are granted an ASN. This leaves open the possibility that ASNs may be a significant challenge for inspection and enforcement authorities dealing with a large number of extra businesses on top of their responsibility for all licensed premises.

Consultation Question 20:

Do you think that these proposals would significantly reduce the burdens on ancillary sellers?

		Yes	No	Don't Know
A.	Allow premises making ancillary sales to request in their premises licence application that the requirement for a personal licence holder be removed.			<i>See below</i>
B.	Introduce a new, light-touch form of authorisation for premises making ancillary sales - an 'ASN' but retain the need for a personal licence holder.			<i>See below</i>
C.	Introduce a new, light touch form of authorization for premises making ancillary sales – an ASN - with no requirement for a personal licence holder.			<i>See below</i>
As a matter of principle, we do not believe that there should be any reduction in the regulation of alcohol.				

Consultation Question 21:

Do you think that the following proposals would impact adversely on one or more of the licensing objectives?

		Yes	No	Don't Know
A.	Allow premises making ancillary sales to request in their premises licence application that the requirement for a personal licence holder be removed.	Yes		
B.	Introduce a new, light-touch form of authorisation for premises making ancillary sales an - 'ASN' but retain the need for a personal licence holder.	Yes		
C.	Introduce a new, light-touch form of authorization for premises making ancillary sales - an ASN - with no requirement for a personal licence holder.	Yes		

Consultation Question 22:

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 views to a maximum of 200 words):

We do not agree with any deregulation or unregulated sales of alcohol. The consumption of alcohol should be de-normalised in our society. This can be achieved through proper regulation which would help to reduce consumption with resulting benefits to the health and wellbeing of society.

Community premises are generally non-profit making whilst the proposed ancillary sellers are businesses. We

are concerned that the legislation would provide loopholes for irresponsible businesses to abuse.

Exempting ancillary sellers would undo the gains made through the Government's consultation Rebalancing the Licensing Act – which sought to empower individuals, families and local communities to shape and determine local licensing.

Consultation Question 23:

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?

Yes	No ✓	Don't Know
-----	------	------------

Consultation Question 24:

What impact do you think a locally determined notification would have on organisers of community events?

		Yes	No	Don't Know
A.	Reduce the burden.		No	
B.	Increase the burden.	Yes		

Consultation Question 25:

Should the number of TENs which can be given in respect of individual premises be increased?

Yes	No ✓	Don't Know
-----	------	------------

Consultation Question 26:

If yes, please indicate which option you would prefer:

15	N/A
18	N/A
Don't know	N/A

Consultation Question 27:
Do you think that licensing authorities should have local discretion around late night refreshment in each of the following ways?

		Yes	No	Don't Know
A.	Determining that premises in certain areas are exempt.		No	
B.	Determining that certain premises types are exempt in their local area.		No	

Consultation Question 28:

Do you agree that motorway service areas should receive a nationally prescribed exemption from regulations for the provision of late night refreshment?

		Yes	No	Don't Know
A.	Motorway service areas should receive a nationally prescribed exemption from regulations for the provision of late night refreshment.		No	

Consultation Question 29:

Please describe any other types of premises to which you think a nationally prescribed exemption should apply (keeping your views to a maximum of 100 words):

--

Consultation Question 30:

Do you agree with each of the following proposals?:

		Yes	No	Don't Know
A.	Remove requirements to advertise licensing application in local newspapers.		No	
B.	Remove the centrally imposed prohibition on the sale of alcohol at MSAs for the on and off-trade.		No	
C.	Remove the centrally imposed prohibition on the sale of alcohol at MSAs but only in respect of overnight accommodation – “lodges”.		No	
D.	Remove or simplify requirements to renew personal licences under the 2003 Act.		No	

Consultation Question 31:

Do you think that each of the following would reduce the overall burdens on business?:

		Yes	No	Don't Know
A.	Remove requirements to advertise licensing application in local newspapers.			<i>See below</i>
B.	Remove the centrally imposed prohibition on the sale of alcohol at MSAs for the on and off-trade.		No	
C.	Remove the centrally imposed prohibition on the sale of alcohol at MSAs but only in respect of overnight accommodation – “lodges”.		No	
D.	Remove or simplify requirements to renew personal licences under the 2003 Act.		No	

The question is constructed in such a way that seems to assume the outcome of the proposal to remove this requirement. We disagree with this proposal and believe that this will increase alcohol consumption which increases burdens to businesses.

Consultation Question 32:

Do you think that the following measures would impact adversely on one or more of the licensing objectives?:

		Yes	No	Don't Know
A.	Remove requirements to advertise licensing application in local newspapers.	Yes		
B.	Remove the centrally imposed prohibition on the sale of alcohol at MSAs for the on and off-trade.	Yes		
C.	Remove the centrally imposed prohibition on the sale of alcohol at MSAs but only in respect of overnight accommodation – "lodges".	Yes		
D.	Remove or simplify requirements to renew personal licences under the 2003 Act.	Yes		

Consultation Question 33:

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 specify in the box below keeping your views to a maximum of 200 words):

There are no processes that could be removed or simplified without having an adverse effect on the licensing objectives or increasing the burden on responsible authorities or the local community.

Consultation Question 34:

Do you think that the Impact Assessments related to the consultation provide an accurate representation of the costs and benefits of the proposals?:

		Yes	No	Don't Know
A.	Minimum unit pricing.		No	
B.	Multi-buy promotions.			See below
C.	Health as a licensing objective for cumulative impact.			Don't know
D.	Ancillary sales of alcohol.			Don't know
E.	Temporary Events Notices.			Don't know
F.	Late night refreshment.			Don't know
G.	Removing the duty to advertise license applications in a local newspaper.			Don't know
H.	Sales of alcohol at motorway service stations.			Don't know
I.	Personal licenses.			Don't know

We do not feel there is sufficient information given to enable us to answer this question.

Consultation Question 35:

Do you have any comments on the methodologies or assumptions used in the impact assessments? If so please detail them, referencing clearly the impact assessment and page to which you refer.

Yes

✓

No

Don't Know

If yes, please specify in the box below, referencing clearly the impact assessment and page to which you refer (keeping your views to a maximum of 400 words).

Impact Assessment: A minimum Unit Price for Alcohol

Ref p10: We are concerned that new methodology has been applied to work out the benefits delivered by a MUP at 45p. While we accept that the methodology should be updated to take account of inflation, no comparison has been provided for a MUP set at alternative levels.

There is also no rationale as to why the figure of 45p has been chosen. In its report on the Government's Alcohol Strategy the House of Commons Health Committee states that: "If the minimum unit price in England were to be fixed at a different level to that in Scotland, we would expect the evidence supporting that decision to be set out clearly."

Impact Assessment: Health as an objective for cumulative impact

Ref p7: In principle public health as an objective should be ranked alongside the other four licensing objectives and not tied to CIPs. We do not accept the rationale for the link made in the impact assessment. It is not disproportionate for the industry to promote sensible drinking and low and non-alcoholic drinks.

Impact Assessment: Ancillary sellers

Ref p 1, 2, 3: We are concerned that the potential benefits to business are insufficient to run the risk of increased alcohol-related health harms, a risk highlighted on also highlighted in the document.

Ref p6: We are concerned that the section on "Minimal" sales is highly ambiguous and provides no reassurance that loopholes would not be created. Local decisions by licensing authorities are likely to be subject to legal challenge, an expensive process for local authorities, especially given the current economic climate.

Ref p8: The document estimates that up to 9,116 new alcohol sales venues could be created after three years, a significant increase in the availability of alcohol. This figure is partly based on the take up of licenses by 'community premises'. While the figure has been increased from 4% to 6%, we believe that increase may be insufficient given the profit motive behind businesses which is not so present for community premises.

**Association of Directors of Public Health
February 2013**

References:

¹ Meng, Y. et al. (2012) 'Model-based appraisal of alcohol minimum pricing and off-licensed trade discount bans in Scotland using the Sheffield Alcohol Policy Model (v.2): Second update based on newly available data' ScHARR, University of Sheffield

² Donaldson, L (2009) '150 years of the Annual Report of the Chief Medical Officer: On the state of public health 2008' http://www.dh.gov.uk/prod_consum_dh/groups/dh_digitalassets/documents/digitalasset/dh_096231.pdf