Public Health (Minimum Price for Alcohol) (Wales) Bill Consultation Response

On behalf of The Methodist Church and the United Reformed Church

Introduction

The Methodist Church in Britain and the United Reformed Church together represent around 250,000 Christians in the UK. We have a significant presence in Wales and submit this consultation response on behalf of our Churches and their members there. The United Reformed Church National Synod of Wales/Eglwys Ddiwygiedig Unedig Synod Cenedlaethol Cymru comprises 92 congregations with 2,600 members and adherents. The Methodist Church in Wales/Yr Eglwys Fethodistaidd yng Nghrymu comprises two Districts, the Wales Synod and Synod Cymru, which have a combined total of nearly 260 churches and chapels spread across 16 circuits.

Christians have historically been, and continue to be, concerned around the dangers of alcohol misuse, and the damaging effects that hazardous drinking can have on individuals, families, communities and broader society. Where in the past some Churches have promoted total abstinence from alcohol, our Church bodies encourage a responsible and moderate approach. As a result, we welcome Government policies that protect all people, especially those who are most vulnerable, from the damaging effects of hazardous levels of drinking.

Consultation Response

1. We welcome this consultation into introducing minimum unit pricing (MUP) in Wales. The Methodist Church and the United Reformed Church support the introduction of this important policy. We have publicly supported minimum unit pricing since the UK Government first explored the policy in 2011, and are encouraged by this progress towards introduction of MUP in Wales. We welcomed the Supreme Court's ruling allowing the introduction of MUP in Scotland, and hope that the outcome from this consultation will lead to further progress across the rest of the United Kingdom, starting with the National Assembly for Wales.

General Principles

2. We commend the general principles within this Bill. There is strong evidence that the UK has developed problems linked to alcohol consumption, and Wales is no exception. Alcohol is linked to 29 deaths every week in Wales,[1] and NHS services are already strained by the short and long-term health impacts of alcohol misuse. There is a need for the Government to respond to this harmful level of drinking.
3. As this Bill's Explanatory Memorandum demonstrates, the price of alcohol is linked to its consumption. The evidence strongly points to the fact that introducing a minimum price per unit of alcohol will save lives, reduce hospital admissions and reduce the costs to wider society. Although the Bill proposes that the minimum price per unit will be specified in regulations, it is important that the right price is chosen in order to maximise the effect of the policy.
4. Section 22 of the Bill proposes a six-year 'sunset clause'. If this trial period is to show the effects of minimum unit pricing clearly, we propose that the minimum unit price should be no less than

[1] http://www2.nphs.wales.nhs.uk:8080/PubHObservatoryProjDocs.nsf/85c50756737f79ac80256f2700534ea3/d7ead329fc08591480257d7200326f03/$FILE/AlcoholAndHealthInWales2014_v2a.pdf

45p.[2] The most recent research suggests that a minimum unit price of 60p will produce the most desirable outcomes.[3] With a 60p minimum unit price, we would expect to see significant results before the sunset provision takes effect.

5. Although the Explanatory Memorandum states that there is no consensus over the responsiveness of harmful and hazardous drinkers to the price of alcohol, we cite the prominent simulation of minimum unit pricing, Sheffield University's *Sheffield Alcohol Policy Model* (SAPM) 2013, the conclusion of which states: 'Somewhat larger impacts would be experienced by hazardous drinkers, and the main substantial effects would be experienced amongst harmful drinkers'.[4]

6. Our Churches work actively towards a society which protects the vulnerable, encourages behaviour that is healthy and allows individuals and communities to flourish. Minimum unit pricing is a particularly effective policy because of the projection that 90% of those whose lives are saved will come from the lowest income groups.[5] These are groups where hazardous drinking is not only related to health and social problems, but also to poverty.

7. It is important to note that this policy will not indiscriminately target those in the lowest income group, but rather only those who are hazardous drinkers. It will not work, however, to target those who drink excessively in licensed premises or who drink hazardous levels of more highly priced alcohol. It should, therefore, sit within a suite of policies that encourage a healthier approach to alcohol consumption across the whole of the population.

Barriers

8. The decision of the Supreme Court on 15 November 2017 to allow the introduction of minimum unit pricing in Scotland ended the legal challenge posed by the alcohol industry. With this development, Scotland will become the first country in the world to introduce universal minimum unit pricing. This is an encouragement to Wales to become the first country in the world to follow suit.
9. The Explanatory Memorandum sets out the difficulty of introducing MUP in communities next to the border with England as consumers could travel across the border to purchase cheaper alcohol from English retailers. We commend the work that the National Assembly has undertaken to ensure that the use of Welsh-registered debit and credit cards used to purchase alcohol in England is monitored in order to track any changes that MUP may provoke. Of course, our Churches continue to call for MUP in England, which would remove this potential barrier to effective introduction of the policy.

Financial Implications

10. The Explanatory Memorandum concludes that MUP is more effective than taxation in reducing problematic drinking. We point out the additional benefit to any increase in public revenue offered by increased taxation, would be balanced with the decreased pressure on social spending that minimum unit pricing will offer. A 2003 Cabinet Office report cited £21 billion as the cost of alcohol abuse to public revenue per annum in England and Wales,[6] although this has been widely cited as a conservative estimate.[7] The introduction of minimum unit pricing in

[2] https://www.sheffield.ac.uk/polopoly_fs/1.291621!/file/julyreport.pdf
[3] http://www.thelancet.com/pdfs/journals/lancet/PIIS0140-6736(16)32420-5.pdf
[4] https://www.sheffield.ac.uk/polopoly_fs/1.565373!/file/Scotland_report_2016.pdf
[5] http://dx.doi.org/10.1371/journal.pmed.1001963
[6] http://alcoholresearchuk.org/wp-content/uploads/2014/01/strategy-unit-alcohol-costs-2003.pdf
[7] Bhattacharya, A. (2016), Which cost of alcohol? What should we compare it against?, Addiction doi:10.1111/add.13335; Full Fact (2012), Does Britain lose £21 billion to alcohol abuse each year?

British Columbia, Canada, has shown a reduction of health-related costs within two years of introduction.[8] We expect to see the same in Wales. The cost to emergency services, the police force, and social services of alcohol misuse should also be expected to fall with the introduction of MUP, as well as the decreased productivity associated with excessive alcohol consumption.[9]

Conclusions

11. To conclude, our Churches continue to call for the introduction of minimum unit pricing as an effective policy which can save lives, reduce costs to the public, and target particularly hazardous drinkers. Our Church members also express an expectation that this policy will work towards making our town centres feel safer through reduced alcohol abuse. We endorse this Bill and look forward with anticipation to the National Assembly for Wales' decision. For the most effective outcomes, we recommend a floor price of no less than 45p and ideally nearer 60p. To quote a letter our churches, alongside other faith groups and charities, wrote to David Cameron in 2012, calling for minimum unit pricing to be introduced in England and Wales: 'There are various factors involved in problem drinking, but numerous studies have shown that price is the key determinant. Unless you include strong action on per unit pricing, other measures such as a ban on below-cost sales, a special tax on strong beers or a voluntary code for advertising are likely to be inadequate.'

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[8] http://ajph.aphapublications.org/doi/abs/10.2105/AJPH.2013.301289

[9] http://www.ias.org.uk/uploads/pdf/Factsheets/FS%20economic%20impacts%20042016%20webres.pdf