



Arbenigwyr mewn Busnes  
Experts in Business

MPA 25  
Bil Iechyd y Cyhoedd (Isafbris am Alcohol) (Cymru)  
Public Health (Minimum Price for Alcohol) (Wales) Bill  
Ymateb gan Ffederasiwn Busnesau Bach  
Response from Federation of Small Businesses

14th December 2017

Dai Lloyd AM  
Chair, Health and Social Care Committee  
National Assembly for Wales  
Cardiff Bay  
CF99 1NA

Dear Dai

**RE: Public Health (Minimum Price of Alcohol) (Wales) Bill**

FSB Wales welcomes the opportunity to comment on the Health and Social Care Committee's consideration of the Public Health (Minimum Price of Alcohol) (Wales) Bill.

FSB Wales is not best placed to comment on the potential health and social impacts of the Bill to introduce a minimum unit price for alcohol (MUP). As such, we have no fixed view on the principles that relate to the introduction of a MUP policy. Our comments therefore relate only to the implementation of the policy and the potential impact this may have on smaller retailers.

One key concern for us relates to how the Bill will be implemented in the future. We know from previous research around regulatory policy in Wales that public protection and trading standards departments at local authorities have experienced significant levels of cuts to their budget as a result of being unprotected areas of spend. Indeed, we note that the evidence provided by the WLGA to the committee suggests that *"it is regrettable, that as Local Authority regulatory services continue to be cut, it is no longer realistic to expect proactive, consistent enforcement activity across Wales."*

FSB Wales has in the past called for a much stronger statement of direction from Welsh Government in relation to regulatory policy through our report *Better Regulation for Wales*. Our concern is that as the regulatory responsibility grows on local authorities as the result of Welsh Government legislation, there is a lack of emphasis on how that regulation is going to be delivered. This in turn results in patchy or poorly focused regulatory enforcement that doesn't have the capacity to educate and advise firms at risk of non-compliance.

It is notable that the only local authority currently pursuing a better regulation agenda through the UK Government's *Better Business for All* scheme is Denbighshire. Whilst we would encourage all local authorities to follow Denbighshire's example, Welsh Government clearly has a role to play in showing leadership and direction in this area.

In relation to the specific regulatory requirements that would be brought in by the Bill, FSB Wales agrees with other contributors including the WLGA that the best way to ensure good implementation of this policy is to ensure that there is a well-resourced communication campaign to ensure that those businesses required are aware of their responsibilities in terms of implementation.



Arbenigwyr mewn Busnes  
Experts in Business

Furthermore, sufficient resource should be available through public protection departments to provide the correct level of advice and support for smaller firms that may have questions about how they go about implementing MUP in their business.

I hope you find our comments of interest as you scrutinise the Public Health (Minimum Price of Alcohol) (Wales) Bill.

Yours sincerely

**Janet Jones**  
**Wales Policy Chair**  
**Federation of Small Businesses Wales**