

MPA 41

Bil Iechyd y Cyhoedd (Isafbris am Alcohol) (Cymru)

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

Ymateb gan Fforwm Iechyd y DU

Response from UK Health Forum



**UK Health Forum Response to the Health, Social Care and Sport Committee's consultation on the  
Public Health (Minimum Price for Alcohol) (Wales) Bill**

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## About the UK Health Forum

The UK Health Forum (UKHF), a registered charity, is both a UK forum and an international centre for the prevention of non-communicable diseases (NCDs) including coronary heart disease, stroke, cancer, diabetes, chronic kidney disease and dementia through a focus on up-stream measures targeted at the four shared modifiable risk factors of poor nutrition, physical inactivity, tobacco use and alcohol misuse. UKHF undertakes policy research and advocacy to support action by government, the public sector and commercial operators. As an alliance, the UKHF is uniquely placed to develop and promote consensus-based healthy public policy and to coordinate public health advocacy.

UKHF welcomes the opportunity to respond to the Health, Social Care and Sport Committee's consultation on the Public Health (Minimum Price for Alcohol) (Wales) Bill. Our comments on the general principles, barriers to implementation and any unintended consequences of the Bill are answered below.

### Answers to questions:

#### **1) Comment on the general principles of the Bill and the extent to which it will contribute to improving and protecting the health and well-being of the population of Wales**

- The UK Health Forum welcomes and supports this legislation. We have long supported Minimum Unit Pricing (MUP) for alcohol
- MUP is one of the most effective and cost-effective measures to reduce alcohol-related harm and it will improve and protect the health and well-being of the population of Wales significantly
- Introducing this measure at this time is especially important, given the recent announcement from the Welsh government that alcohol deaths in Wales increased by 9% in 2016 compared with 2015<sup>1</sup>
- Committee members will be aware of the work Sheffield University has done on behalf of the Welsh government to estimate the impact of MUP in Wales on population health. This work is referenced in the Explanatory Memorandum for the Bill. To summarise some of the Sheffield team's key findings, once the full effects of the policy are in place, MUP in Wales is estimated to lead to:
  - 53 fewer deaths a year
  - 1,400 fewer hospital admissions a year
  - £131 million a year saved in healthcare costs
  - £882 million in savings to society overall each year

At the same time, reductions in drinking will predominantly occur amongst high-risk drinkers, with moderate drinkers barely noticing the difference. According to Sheffield University's

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<sup>1</sup> Welsh government (14 November 2017), 'Increase in alcohol-related deaths in Wales – new report shows'. Available at <http://gov.wales/newsroom/health-and-social-services/2017/item/?lang=en>

analysis, under a 50p MUP, moderate drinkers will spend just £2.37 a year more on alcohol, and consume 6.4 fewer units a year.<sup>2</sup>

- Drinking alcohol regularly can increase the risk of seven different types of cancer. These include: Oral/Mouth cancer, Pharyngeal cancer (upper throat), Oesophageal cancer (food pipe), Laryngeal cancer (voice box), Breast cancer, Bowel cancer, and Liver cancer.

The incidence of alcohol related cancers is rising. For example, according to Cancer Research UK, the incidence of oral cancers in the U.K increased by 68% in the last 20 years.<sup>3</sup> In Wales alone, 2,766 people were diagnosed with oral cancer between 2013 and 2015.<sup>4</sup>

The introduction of MUP of alcohol would ultimately reduce excessive consumption and have a positive impact on the number of cancer cases attributed to alcohol that are presented in Wales.

- MUP would also have positive impacts on other aspects of society. It would reduce dangerous, excessive, 24 hour drinking episodes with important implications for occupational and public safety.
- In addition, among the positive economic effects, fewer days would be lost from work absences, and there would be less disruption from anti-social behavior at cultural and sporting events and on public transport services.

## **2) Comment on any potential barriers to the implementation of the provisions and whether the Bill takes account of them**

- There may be costs associated with the enforcement of the Act by local authorities, at a time when local authorities are under tight financial pressures.
- The Welsh government will need to ensure that local authorities have sufficient funds and support in order to carry out their enforcement work.
- The implementation of MUP should include a mechanism to ensure any windfall gained is re-invested into additional public health work.

## **3) Comment on whether there are any unintended consequences arising from the Bill**

- One consequence of MUP, though not necessarily an unintended one, is that more people may seek help from substance misuse services. An increase in demand could place existing services under further pressure, and it is crucial that this is considered. Treatment services should be funded adequately to meet this demand.

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<sup>2</sup> Sheffield University (2014), Model-based appraisal of minimum unit pricing for alcohol in Wales. Available at <http://gov.wales/docs/caecd/research/2014/141208-model-based-appraisal-minimum-unit-price-alcohol-en.pdf>

<sup>3</sup> Cancer Research UK (2017) Available at <http://www.cancerresearchuk.org/health-professional/cancer-statistics/statistics-by-cancer-type/oral-cancer/incidence#heading-Two>

<sup>4</sup> Welsh Cancer Intelligence and Surveillance Unit (2017) Available at <http://www.wcisu.wales.nhs.uk/dashboard-data>

A number of negative consequences of the Bill have been suggested, and we summarise these below, and give our thoughts on each:

- Concern has been expressed that MUP could lead to increases in dependent drinkers committing crime in order to consume alcohol, or that dependent drinkers may choose to consume harmful alcohol substitutes such as methylated spirits in order to become intoxicated.

A study of dependent drinkers' behaviour following an increase in the price of alcohol found that these effects were very uncommon.<sup>5</sup> A review of the negative impacts of MUP has concluded that, 'unintended negative consequences from MUP are minor in comparison with the substantial health, social and economic benefits the policy creates.'<sup>6</sup>

- Another criticism of MUP has been that it has a disproportionately negative impact on those from low-income households.

Whilst the impact of MUP on high-income drinkers is likely to be less than that felt by low-income drinkers, moderate drinkers at all income levels will barely notice the difference in costs, and we believe the health benefits of MUP outweigh this concern. Those from the lowest incomes stand to benefit the most from MUP, with an estimated 8 out of 10 lives saved coming from the lowest income groups,<sup>7</sup> and of all price-related alcohol policies, MUP reduces health inequalities the most.<sup>8</sup>

- Another concern is that MUP may lead to increased profits for some alcohol producers and retailers in the off-trade, due to the increased prices of the cheapest products. Increased profits could then be spent on activity (e.g. alcohol marketing) which are linked with alcohol harm.

We believe that, on balance, the large benefits of MUP in terms of people's health significantly outweigh this potential consequence. In addition, ensuring that any windfall gains from MUP are reinvested in additional public health activities will further help to address these concerns.

- Concern has also been expressed that MUP would negatively affect pubs.

Assuming the MUP is set at 50p, pub prices will be left unchanged. For example, with a 50p MUP, a pint of average strength beer could not be sold for less than around £1, but this is well below the cost of average beer prices.

MUP could actually be good for pubs, as it would increase the low prices of supermarket alcohol which have led more people to drink at home rather than in pubs.

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<sup>5</sup> Falkner, C. et al. (2016) The effect of alcohol price on dependent drinkers' alcohol consumption, *New Zealand Medical Journal* 128: 1427,9-17

<sup>6</sup> Stockwell, T. & Thomas, G. (2013) Is alcohol too cheap in the UK? The case for setting a Minimum Unit price for alcohol. London: Institute of Alcohol Studies

<sup>7</sup> Holmes, J. et al. (2014) '[Effects of minimum unit pricing for alcohol on different income and socioeconomic groups: a modelling study](#)', *The Lancet*, 383 (9929), 1655-64

<sup>8</sup> Meier, P. M. et al. (2016) Estimated Effects of Different Alcohol Taxation and Price Policies on Health Inequalities: A Mathematical Modelling Study. *PLOS One*. Vol: 13 Iss: 2