



Alcohol Focus Scotland response to WHO

Alcohol Focus Scotland is supportive of the WHO report “Strategies to reduce the harmful use of alcohol”, March 2008, which we believe contains the major policy and strategy options for reducing alcohol related harm.

AFS believes it is important to draw on the many imaginative proposals which have proven to have a positive impact in other countries. In Scotland, the scale of alcohol related harm has reached unprecedented levels, demanding tough action and the adoption of some of the strategies from other countries as preferred approaches in this country.

There is a substantial body of international evidence which shows that raising the price of alcohol is one of the most effective policy tools for tackling alcohol misuse. Although no single approach will provide an instant solution to the problems related to alcohol consumption, the evidence illustrates that tackling price *will* make a contribution to reducing consumption and ultimately reducing harm to the people of Scotland.

A balance has to be struck between protecting and improving the nation’s health and welfare and individual rights. Pricing strategies do increase the cost of alcohol for everyone, so, while arguably disadvantaging some, it also reduces harm to others such as older people, dependant drinkers and people living in disadvantaged circumstances.

Question 1: What are your views on effective strategies to reduce alcohol-related harm?

Question 2: From a global perspective, what are the best ways to reduce problems related to harmful use of alcohol?

AFS believes we can all learn from evidence of successful initiatives and policy of other countries on alcohol control, reduced consumption, tougher drink driving laws, brief interventions, etc.

1) Legislation

Licensing Legislation must contain a principle which states quite clearly that alcohol should be sold in such a way that it protects public health. By introducing such a principle this measure clearly places greater responsibility on producers and retailers to make a contribution to reducing alcohol related harm.

2) Price of alcohol

There is strong evidence from across the world that levels of alcohol consumption are closely linked to the retail price of alcoholic beverages. As alcohol becomes more affordable, consumption increases.¹

2.1) Promotions and Loss Leading

Alcohol Focus Scotland supports the Scottish Government’s proposal to end promotions offering free alcohol or quantity discount for bulk buying. The UK Competition Commission identified that

¹ *Changing Scotland’s relationship with alcohol*: a discussion paper on our strategic approach. June 2008

alcohol is more aggressively discounted than other products, encouraging bulk purchase and increasing overall consumption. This use of alcohol as a special incentive has been a significant factor in increasing rates of harm. There is some evidence to suggest that point of purchase promotions, are likely to affect the overall consumption of under-age drinkers, binge drinkers and regular drinkers.²

For the responsible sale of alcohol which is a legal drug, the practice of selling alcohol so cheaply that children can easily afford it, and bulk buying to drive sales is totally unacceptable. We believe that it should be illegal to sell alcohol as a loss-leader.

2.2) Minimum pricing and cheap promotions

We believe that discounting encourages people to buy more alcohol than they intend and that they return more frequently than they plan to. This suggests they drink more alcohol and more quickly than usual, and measures should be in place to reduce the likelihood of such behaviours. Setting a minimum cost per unit of alcohol is a fair way to reduce the price incentive of some products which, in one bottle, can contain the maximum *weekly* recommended limit for a man.

Minimum pricing schemes should provide incentives to producers to develop lower strength products rather than the current practice of producing higher strength products.

We believe the basic principles of a minimum pricing scheme should be:

- that the price should have a relationship with the alcoholic strength
- that the prices should apply equally to all premises selling alcohol;
- that prices should be set independently of those involved in the production, distribution, retail or any other activity connected with the sale alcoholic products.

3) Standard measures of alcohol: Legislation should require licensed premises to automatically sell measures of 125ml for wine and 25ml for spirits, unless the customer asks for a larger glass size. This sends a clear message on the importance of glass size and will help to de-normalise 'super size' measures.

It has been our concern that many alcohol products have increased in strength over time, particularly beers and wines. The strength of an average wine is now 12-14%abv and beer and lager is commonly 5%. However unit calculations have not followed suit and this creates confusion and under-estimation on the number of units consumed by people.

At the same time, the size of measures, particularly of wine, have hugely increased. Wine glass sizes now range from an historical common standard of 125 ml to 175 ml or 250 ml. This means that people are often drinking much more alcohol than they are aware of, not only because of larger glass sizes but also because of the increased alcohol strength of products.

4) Defined display areas

We believe retailers should only display alcohol within clearly defined aisles or areas. This acknowledges that alcohol is no ordinary commodity and not the same as other potentially less harmful products such as bread and milk. If customers have to go to a specific area to purchase alcohol, this will help them to make the 'psychological shift' that they are choosing a controlled

² Review of the Social Responsibility Standards for the production and sale of alcoholic drinks. Home Office, April 2008.

product. Currently, it is too easy to buy alcohol on impulse from the many points promoting it around the store.

5) Separate Alcohol Checkouts in supermarkets and other large retail outlets

Separate checkouts already exist for other controlled products like tobacco and pharmaceutical drugs. The big advantage of separate checkouts is that they would be staffed by people who are properly trained and it would be easier for staff to check a customer's ID.

We also believe there is an opportunity for shops and supermarkets to use their technology to print information on units and the sensible drinking guidelines on till receipts to help customers see how much they've purchased on that visit.

Definite benefits could be brought about by:

- only over-18's who have received training, should sell alcohol
- dedicated checkouts for alcohol and grocery sales
- Unit information should be provided on products and till receipts and illustrate what these mean in context of recommended limits.

6) Screening and brief interventions: The Scottish Government has recently invested money in a new programme for screening and briefing interventions, with GPs being the first point of contact. Training will be provided for all primary care health workers, this is based on evidence which suggests that brief interventions are a useful preventative tool in reducing alcohol related harm.

7) Awareness raising campaigns

AFS, whilst accepting that education and persuasion have limited effectiveness and can be costly to implement, takes the position that it can be effective when part of a wider policy context. We believe that alcohol awareness raising campaigns, events such as a national alcohol awareness week, can contribute, over time to changing drinking cultures.

8) Product labelling

Recently, there has been an increase in the number of products carrying unit information. However, some labelling e.g. bottles of wine, simply state the number of units contained typically within a 125ml glass. This is potentially misleading for two reasons; public awareness of what a 125ml glass actually contains is poor, and home poured measures tend to be larger than those poured in pubs and bars. Also, the amount contained in the bottle (as opposed to simply a glass) needs to be highlighted so that people are clear exactly how much they are drinking. Only 15% of people in Scotland can correctly estimate the number of units in a bottle of wine.³

Labelling needs to be meaningful and unambiguous, and should include information on how to reduce harm from excessive drinking as well as information on units.

9) Advertising

³ *Something to be ashamed of or part of our way of life?* Scottish Social Attitudes Survey 2007, Scottish Government

“Of all drugs, the use of alcohol has shown the greatest recent growth and causes the most widespread problems among young people in the UK today. It is also the least regulated and the most heavily marketed”⁴.

Advertising of alcoholic drinks has changed enormously in recent years – we are seeing a huge shift from TV and cinema advertising to more technologically advanced marketing through the internet and text/phone download facilities. This is a worrying development as many young people can be exposed to sophisticated advertising, simply by entering a date of birth on a website. This measure of restricting access using a date of birth entry is extremely weak.

However, given that adverts for many alcohol products can be accessed through non drinks industry websites (e.g. *Youtube*), with absolutely no measures in place to restrict access, it is now time to debate the need for a ban on alcohol advertising.

Measures should be put in place to ensure that when a company advertises a product or enters into sponsorship, there should be a reminder that alcohol is a drug, and that alcohol awareness resources must be available. It is also important that these resources are produced and verified by a body independent of the industry.

A recent study has claimed that athletes funded by the drinks industry were more likely to engage in binge drinking than those with no alcohol sponsor. Researchers said athletes felt obligated to drink the sponsor's product when free or discounted alcohol formed part of the deal. The joint study by the University of Manchester and the University of Newcastle in Australia questioned 1279 sportspeople in New Zealand. Alcohol industry sponsorship was reported by 47.8% of the athletes surveyed and of that figure 46.7% said they were given free or discounted alcohol.

Some countries have adopted a ban on televised sporting events showing any advertising of alcoholic products and this does appear to be effective. This is supported by a recent report by the UK Home Office, evidence statement number 8: *“There is consistent evidence to suggest that exposure to **outdoor advertising**, or advertising in magazines and newspapers may increase the likelihood of young people starting to drink, the amount they drink, and the amount they drink on any one occasion.”*

There is an increasing body of international opinion that suggests that voluntary codes of self-regulation “are not always adhered to and are largely ineffective”.⁵

AFS believes that a % fee should be paid based on advertising expenditure by manufacturers towards health campaigns to illustrate the harmful effects of over-consumption.

AFS also believes that there should be a ban on alcohol advertising before the 9pm watershed.

10) Drink driving

Scotland is tied to the UK drink drive limit of 80mg per 100ml of blood limit. We strongly support the researched evidence which supports the need for a reduction in the UK limits to bring it in line with the rest of Europe at 50mg.

Effective drink driving policies rely on drivers recognising that they are likely to be caught. Random breath testing which is widely used in other countries is essential to achieve this.

⁴ *Pathways to Problems*. Advisory Council on the Misuse of Drugs- Sept 2006

⁵ Alcohol Misuse: tackling the UK epidemic. BMA Board of Science, Feb 2008.

Zero Tolerance for all new drivers who have held their license for less than a year. We also would like to see a review of reducing the limit even further for young drivers e.g. 10mg per 100ml of blood to help reduce the casualties and deaths on the roads.

11) Alcohol sales on transport

We believe that the availability of alcohol on certain forms of public transport requires to be reviewed.

Drunken behaviour at any time can be terrifying for people but within a confined space such as a plane or train, the impact on other travellers can be huge. Visible and obvious drunkenness can simply be viewed as a nuisance, but drunken behaviour is also risky behaviour, which create health and safety risks for all passengers and staff. We also believe that children are unnecessarily exposed to drunken behaviour and have a right to be protected from this.

We believe that at least the availability and consumption of alcohol should be restricted to specific areas and also restricted in amounts. This could easily be controlled with a simple system e.g. two drinks per passenger on production of travel tickets which are stamped, when an alcohol purchase is made.

This would also make it simpler for sellers of alcohol to know when to stop selling and serving alcohol to a person as all passengers are entitled to an equal, restricted amount.

Question 3: In what ways can you or your organization contribute to reduce harmful use of alcohol?

Alcohol Focus Scotland is the only national Scottish charity solely dedicated to raising awareness of, and reducing the significant health and social harm caused by alcohol. Our long term aim is to achieve culture change in Scotland where far fewer lives are affected by alcohol misuse, and moderate, responsible drinking is the norm.

We will achieve this by providing accurate information to the public and professionals, changing attitudes towards drunkenness, training people to recognise and help people overcome alcohol problems, influencing government and policy, and working in partnership with other organisations on specific projects.

Scotland's escalating problems with alcohol are truly shocking and this is completely at odds with a country that enjoys the benefits of many great resources (natural, historic, community, population, wealth). Our current relationship with alcohol undermines our potential as individuals, families, communities and as a country.

Alcohol Focus Scotland is aiming to create a Scotland:

- where moderate, responsible drinking is the norm, and drunkenness has become socially unacceptable
- where town and city centres are free from alcohol-fuelled disorder and violence
- where fewer families break up and have children taken into care because of parental drinking

- where people who do develop alcohol problems can access appropriate treatment and support quickly and effectively
- where all alcohol producers and retailers take their legal and social responsibilities seriously
- where significantly fewer Scots have their lives cut short by alcohol misuse

Alcohol Focus Scotland
166 Buchanan Street
Glasgow G1 2LW

Tel: 0141 572 6700

Email: enquiries@alcohol-focus-scotland.org.uk
www.alcohol-focus-scotland.org.uk

Registered Scottish Charity SC009538