



WRITTEN EVIDENCE TO HEALTH AND SPORT COMMITTEE - IMPACT OF LEAVING THE EUROPEAN UNION ON HEALTH AND SOCIAL CARE IN SCOTLAND

Alcohol Focus Scotland (AFS) is the national charity working to prevent and reduce alcohol harm. We aim to reduce the impact of alcohol in Scotland through the implementation of effective alcohol control policies and legislation. AFS welcomes the opportunity to provide written evidence to the Health and Sport Committee on their inquiry into the impact of leaving the European Union on health and social care in Scotland.

1. How could the potential risks of Brexit for health and social care in Scotland be mitigated?

With the introduction of minimum unit pricing (MUP) for alcohol, Scotland has been recognised as a world leader, known internationally for our progressive and evidence-based approach to alcohol policy. It is crucial that Scottish alcohol policy continues to be based on the most current evidence and has a significant focus on prevention.

Membership of the European Union has been advantageous to Scotland in relation to alcohol policy. Resources provided for EU research and projects on alcohol have contributed to the evidence base on alcohol harm and policy and in particular improved comparison of UK and Scottish data with those of other countries.

There is the risk that the UK could be more vulnerable to the threat of alcohol industry lobbying, particularly in a hard Brexit focused on deregulation. This could take the form of an economic argument given the significance of the Scotch whisky industry to the balance of payments.¹ Large multinational alcohol companies may seek to argue that their economic contribution should outweigh their profound impact on health and society, particularly in the event of significant economic changes after leaving the UK. Given that the total cost of alcohol misuse to Scotland is estimated at £3.6 billion every year² – not to mention the misery caused to individuals, families and communities - this argument should be dismissed.

2. How could the potential benefits of Brexit for health and social care in Scotland be realised?

Alcohol misuse continues to be a major health, economic and social challenge for Scotland, costing around £267m to the NHS and £209m to social care services.³ In Scotland, 24 people die every week due to alcohol,⁴ and alcohol-related death rates are 54% higher than in England and Wales.⁵ In addition, excessive alcohol consumption is a major risk factor for non-communicable diseases (NCDs), which are Scotland's biggest killers.⁶ A detailed analysis of the burden of disease attributable to alcohol in Scotland will be available later this year.

As recognised by the World Health Organization (WHO)⁷ and the Christie Commission⁸, prevention of poor health represents a worthwhile investment across all government departments and should be given priority as a key contributor to a fairer and wealthier society.

Evidence-based action to prevent and reduce alcohol-related harms is proven to deliver improved outcomes and can reduce costs to public services without significant public investment. There are some potential benefits of Brexit for alcohol harm prevention in Scotland, such as the opportunity to introduce mandatory alcohol labelling, and volumetric alcohol taxation.

Firstly, increasing consumers' knowledge of the consequences and risks of alcohol consumption, and about the recommended guidelines for alcohol consumption, would contribute to changing attitudes towards alcohol and drinking. With the potential for high calorie content in alcoholic drinks to contribute to obesity (a large glass of wine has the same calories as a portion of fries), it is concerning that most people are unaware of the calorific content of alcohol. A survey commissioned by the Royal Society for Public Health showed that over 80% of people did not know, or underestimated, the number of calories in a large glass of wine.⁹ In addition, the Alcohol Health Alliance's review of alcohol labelling found that the vast majority of current alcohol labels are failing to communicate the alcohol guidelines and the harms associated with alcohol.¹⁰

The World Health Organization has proposed introducing a series of warning or information labels on all alcoholic beverage containers,¹¹ providing information both on ingredients and on the risks associated with alcohol consumption. However, EU regulation 1169/2011 on nutrition and food labelling currently exempts alcohol, meaning that there is no legal requirement for nutritional information to be displayed on alcoholic products in the EU or UK. Individual EU Member States can propose imposing additional labelling requirements on ingredients for all or certain alcoholic beverages, but the European Commission must be notified of and assess draft national rules on food labelling before their possible adoption.¹² It is unacceptable that consumers are provided with less information on the labels of products containing alcohol - a carcinogenic and addictive substance – than on a pint of milk.

Brexit would enable the introduction of mandatory health warnings and nutritional labelling on alcohol products. This would go some way towards ensuring that the public are aware of the health risks associated with alcohol consumption in order to make informed choices about their drinking.

A second potential opportunity offered by withdrawal from the European Union is the possibility for the UK to introduce volumetric taxation of alcohol. The structure of UK alcohol taxes is currently governed by European Directives that mean it is not possible to tax wine or cider proportionate to their strength. Moreover, no products can be marketed as 'wine' in the EU if they are below 8.5% ABV (with the exception of wine of Protected Designation of Origin), and current EU rules prohibit the use of technology to reduce the strength of wine by more than 2% ABV. This means that currently there is no tax incentive for wine and cider manufacturers to produce lower strength products within the relatively wide existing tax bands, instead creating a perverse set of incentives to favour stronger products. This is a large part of the reason that the Institute for Fiscal Studies has condemned the structure of alcohol duty as "a mess".¹³

As Britain renegotiates its trading relationship with the rest of the world, the Government should seek to ensure that it has greater freedom over the structure of alcohol taxes, and in particular reform cider and wine duties so as to disincentivise the production of strong products. At the same time, it should recognise the dangers of cheap, strong alcohol and so ensure that stronger product types are taxed at higher rates.

3) In what ways could future trade agreements impact on health and social care in Scotland?

As the UK renegotiates its trade relationship with the European Union and other countries, it is vital that the Government's capacity to make policies which reduce alcohol harm is not impeded. In a number of prominent cases, such as minimum unit pricing for alcohol and tobacco plain packaging, public health measures have been delayed and obstructed by corporate interests, at great cost to the taxpayer. Securing robust exemptions in future trade agreements, which allow governments to prioritise human health over trade liberalisation, is critical.

4) The Joint Ministerial Committee (EU Negotiations) has agreed a definition and principles to shape discussions within the UK on common frameworks including enabling the functioning of the UK internal market. What implications might this have for health and social care in Scotland and what are your views on how these common frameworks are agreed and governed?

No comment.

¹ Sherry, K. (28 April 2017). *Single malt exports pass £1bn as Scotch returns to growth*. The Spirits Business. Available from <https://www.thespiritsbusiness.com/2017/04/malt-sales-pass-1bn-as-scotch-whisky-returns-to-growth/>, accessed 16/01/2018.

² York Health Economics Consortium, University of York (2010). *The Societal Cost of Alcohol Misuse in Scotland for 2007*. Edinburgh: Scottish Government Social Research.

³ Ibid.

⁴ National Records of Scotland (2017). *Alcohol-Related Deaths in Scotland, 1970-2016*. Edinburgh: National Records of Scotland.

⁵ Giles, L., & Robinson, M. (2017). *Monitoring and Evaluating Scotland's Alcohol Strategy: Monitoring Report 2017*. Edinburgh: NHS Health Scotland.

⁶ National Records of Scotland chart cited in Scottish Government webpage 'Health of Scotland's population - Mortality Rates', page updated September 2016 <http://www.gov.scot/Topics/Statistics/Browse/Health/TrendMortalityRates> ; The Scottish Public Health Observatory (2017). *The Scottish Burden of Disease Study, 2015 Overview report*. Edinburgh: NHS Health Scotland.

⁷ World Health Organization (2000). *Global strategy for the prevention and control of noncommunicable diseases: Report by the Director-General*. http://apps.who.int/gb/archive/pdf_files/WHA53/ea14.pdf?ua=1

⁸ Scottish Government (2011), *Commission on the Future Delivery of Public Services*. APS Group Scotland. <http://www.gov.scot/resource/doc/352649/0118638.pdf>

⁹ Royal Society for Public Health (2014). *Increasing awareness of 'invisible' calories from alcohol*. London: RSPH. <file:///C:/Users/nicola.merrin/Downloads/alcohol%20calorie%20labelling%20position%20paper.pdf>

¹⁰ Alcohol Health Alliance (2017). *Right to Know: Are alcohol labels giving consumers the information they need?* London: Alcohol Health Alliance <http://ahauk.org/wp-content/uploads/2017/08/Right-to-Know-AHA-August-2017.pdf>

¹¹ World Health Organization (2010). *Global strategy to reduce the harmful use of alcohol*. Geneva: World Health Organization. http://www.who.int/substance_abuse/msbstrategy.pdf ; WHO regional Office for Europe (2012). *European action plan to reduce the harmful use of alcohol 2012–2020*. Copenhagen: WHO Regional Office for Europe http://www.euro.who.int/__data/assets/pdf_file/0008/178163/E96726.pdf

¹² European Commission (2017). *Report from the Commission to the European Parliament and The Council regarding the mandatory labelling of the list of ingredients and the nutrition declaration of alcoholic beverages*. Brussels: European Commission https://ec.europa.eu/food/sites/food/files/safety/docs/fs_labelling-nutrition_legis_alcohol-report_en.pdf

¹³ Houlder, V. (8 February 2016). *UK taxes on motoring and alcohol 'a mess', says IFS*. Financial Times. Available from: <https://www.ft.com/content/4969d122-ce80-11e5-831d-09f7778e7377>