

## Background

Whilst alcohol consumption has seen a small decline in Wales since its peak in 2004, as a nation we are still drinking too much, more than double the amount we were drinking in the 1950s. According to the Welsh Health Survey 2014, ${ }^{1} 40 \%$ of adults in Wales said they had drank more than the (then) recommended guidelines in the past week, including nearly a quarter who reported binge drinking, significantly increasing their risk of developing alcohol-related conditions including, liver disease and cancer of the breast, mouth and throat.

As a consequence, our health system in Wales has been put under enormous pressure: according to a report by the Public Health Wales Observatory, Welsh hospitals handle as many as 1,000 admissions related to alcohol each week and which represent "only the tip of an iceberg which includes many more presentations at emergency departments, ambulance requests and GP appointments, all resulting from alcohol". ${ }^{2}$

The overall rise in consumption and associated harms has been largely driven by the growing affordability of alcohol, now $54 \%$ more affordable than it was 35 years ago when compared with average household income. ${ }^{3}$

Most of this cheap alcohol is sold in the off-trade (such as supermarkets and off-licences), where alcohol is routinely offered at reduced prices to attract people into stores. Typically, it is heavier drinkers who favour low price alcohol most, meaning that it is the cheapest alcohol on the market that is bought and consumed in the greatest quantities, and therefore causes the greatest harm.

Alcohol Concern has been campaigning for several years for a minimum unit price to be introduced in Wales, which would set a baseline price below which alcohol could not be sold. Modelling work undertaken by the Sheffield Alcohol Research Group for the Welsh Government has concluded that minimum unit pricing (MUP) would be effective in reducing alcohol harms, and the costs associated with those harms, without unduly impacting moderate drinkers. ${ }^{4}$ The Welsh Government's Draft Public Health (Minimum Price for Alcohol) (Wales) Bill proposes the introduction of a 50p per unit minimum price, but much is thought to depend on the outcome of similar plans in Scotland where the legality of MUP is being challenged in the courts by the Scotch Whisky Association.


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## The study

Alcohol Concern Cymru first called for a minimum unit price for Wales in 2009. Seven years on, we were keen to get a better picture of the extent of, and manner in which, cheap alcohol is being sold on Welsh high streets. We commissioned an independent company to undertake research across Wales to get a snapshot picture of where, how and what brands of alcohol are being sold in the offtrade under the 50p per unit threshold proposed by the Welsh Government.

The research was carried out in six urban areas in Wales, namely Bangor, Carmarthen, Mold, Penarth, Pontypool and Rhyl. These were selected simply because they provide a cross-section of typical, midsized towns and cities from all corners of Wales, with which most people will be familiar. Researchers were tasked with physically visiting supermarkets and other off-trade retailers located in the identified areas to find examples of alcohol being sold below the 50p per unit threshold. The individual price, alcohol content (units/abv), drink type, brand name, retailer name, location and date found were all recorded, and photographic evidence captured where practical. The fieldwork was undertaken during January 2016 and all recorded data presented to Alcohol Concern Cymru in February 2016.

## Findings

- Numerous examples of alcoholic beverages for sale at less than 50p per unit were found at all six locations. The lowest price per unit was found in Rhyl, where a 3 litre bottle of Frosty Jack's cider was on sale for $£ 3.50$, equating to just 15.5 p per unit. Those products on sale for lower than 25 p per unit (less than half the proposed 50p per unit minimum price threshold) are listed in the table below:

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## Discussion

As the debate about the legality of MUP rumbles on, the issue of cheap alcohol and the harm that it causes has not gone away. For people who want it, cheap alcohol is widely available in Wales in the off-trade, and in a variety of guises. The most extreme example our study found was the sale of Frosty Jack's cider for 15.5 p per unit, meaning that 14 units - the upper weekly limit of what the UK Chief Medical Officer guidelines suggests represent low risk drinking - could be purchased for just $£ 2.17$. But there were many other examples, some familiar brands and others less so: Carlsberg lager at 29p per unit, Magners cider at 28 p per unit, Queen Margot whisky at 32 p per unit, Country Manor perry at 22 p per unit and Blackheath wine at 39p per unit, to name a few.

In the years since Alcohol Concern Cymru first called for MUP in Wales, there have been a number of initiatives across the UK that have, with varying success, sought to curtail the sale of cheap alcohol. When the UK Government backtracked on plans to introduce MUP in England and Wales in July 2013,
instead it pledged an 'alternate minimum price', whereby the sale of alcohol below-cost (which means that the selling price to consumers could not be lower than tax payable on the product) would be outlawed. However, it has been shown that just $0.7 \%$ of all units on the market were affected by this policy, having a tiny impact on risky drinking behaviours. ${ }^{5}$

In addition, a growing number of off-licenses in England have entered into 'super strength' voluntary agreements with local authorities not to sell beer or ciders above $6.5 \% \mathrm{abv}$. An obvious flaw, of course, is that more determined consumers can acquire their alcohol from retailers that have not signed up to the agreement; nevertheless, such agreements have shown some positive signs of addressing street drinking issues. Perhaps unsurprisingly however, a number of alcohol producers have threatened legal action against local authorities for breach of competition law, and the Competition and Markets Authority has issued guidance that retailers can make an independent decision to join a scheme and stop selling high-strength alcohol, but only if they do not discuss this or agree to this in co-operation with other retailers. ${ }^{6}$

The Welsh Government remains keen on MUP for Wales which it acknowledges that, whilst not a silver bullet that can solve all of our problems with alcohol, "would have significant benefits on the health of the nation, reducing alcohol misuse and drink-related harm." ${ }^{7}$ However, as alluded to above, it is likely much depends on developments in Scotland regarding the legality of MUP as to whether Wales introduces the measure here. It is therefore worthwhile asking: if not MUP, then what?

It was noticeable from our findings that the very cheapest alcoholic beverages on sale in the off-trade are high strength ciders and perries. This is likely due in part to the current tax position whereby, due to an historical anomaly, cider duty is set at a much
lower rate than other alcoholic beverage types. One 'solution' would be to bring cider duty in line with the duty on beer, but there is unlikely much political appetite for this presently - Labour met with much industry resistance when it planned to raise cider duty by $10 \%$ in the run up to the 2010 General Election. ${ }^{8}$

Indeed, the current UK Government has overseen a number of freezes on, and cuts in, alcohol duty (taxation is a non-devolved issue) during the previous few years, and a reversal of this trend is not anticipated any time soon. Moreover, collaborative research from three universities in England has found that tax increases can lead to lower than expected price increases for cheaper products, because retailers absorb these tax increases rather than pass them on to their customers - in other words, cheap alcohol stays cheap, even with duty rises. ${ }^{9}$

Alcohol promotions in Wales which focus on low prices and encouraging impulse purchases need attention. A survey of drinkers in Wales in 2009

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Penarth
South African Whit
Wine
$-75 \mathrm{cl} / £ 3.99 / 9.4$ units
$-\mathbf{- 4 2 p p u}$


- 75cl / £3.33 / 8.6 units



## Country Manor Perry

- 3L / £5.00 / 22.5 units
-22ppu


## Dry Cider

Frosty Jack's Cider

- 2L / £3.29 / 15 units
-22ppu
- 2L / £2.69 / 10 units
-27ppu


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## Alcohol Concern

Alcohol Concern is the national charity on alcohol misuse campaigning for effective alcohol policy and improved services for people whose lives are affected by alcohol-related problems.
We are working at a national level to influence alcohol policy and champion best practice locally. We support professionals and organisations by providing expertise, information and guidance.
We are a challenging voice to the drinks industry and promote public awareness of alcohol issues.

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Published by Alcohol Concern,
on behalf of Alcohol Concern Cym ru,
8 Museum Place, Cardiff, CF103BG
Tel: 02920226746
Email: acwales@alcoholconcern.org.uk
Website: www.alcoholconcern.org.uk
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