



Background

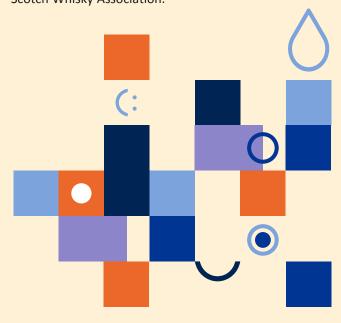
Whilst alcohol consumption has seen a small decline in Wales since its peak in 2004, as a nation we are still drinking too much, more than double the amount we were drinking in the 1950s. According to the Welsh Health Survey 2014, 40% of adults in Wales said they had drank more than the (then) recommended 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. 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.







Alcohol Concern Cymru Briefing

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 15.5p per unit. Those products on sale for lower than 25p per unit (less than half the proposed 50p per unit minimum price threshold) are listed in the table below:

Location	Product/Brand	Price per unit
Bangor	Premium Dry Cider	24p
Bangor	Taurus Cider	24p
Carmarthen	Autumn Harvest Perry	20p
Carmarthen	Crofters Cider	20p
Carmarthen	Diamond White Cider	20p
Mold	Woodgate Dry Cider	22p
Penarth	Country Manor Perry	22p
Penarth	Frosty Jack's Cider	22p
Pontypool	Tesco Apple Cider	23p
Rhyl	Frosty Jack's Cider	15.5p
Rhyl	Taurus Cider	20p

- As illustrated in the table, cider (and perry) represented all of those products at the very cheapest end of the scale. However, it is important to note that the researchers also found many examples of other alcohol types, including lagers, wines and spirits, on sale in the 25p-49p per unit price bracket. In total, 113 different alcoholic products were identified, in 18 stores, on sale for less than 50p per unit.
- Alcoholic beverages for sale at under 50p per unit were not restricted to discount retailers like Iceland and Home Bargains; the researchers also found examples at Sainsbury's supermarket and Marks and Spencer department store. Whilst deprivation was not a particular consideration when selecting the towns for inclusion in the study, the researchers had little problem in locating alcohol under the 50p threshold whether in economically deprived areas like Rhyl or in more affluent areas like Penarth.

Alcohol Concern Cymru Briefing





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 15.5p 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 28p per unit, Queen Margot whisky at 32p per unit, Country Manor perry at 22p 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% 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." 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



Alcohol Concern Cymru Briefing

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

found almost two-thirds (61%) said they bought more alcohol than they intended when shopping in the off-trade because of a promotion or special offer. In Scotland, a ban on multi-buy promotions, like buy-one-get-one-half-price, saw a decrease in off-trade alcohol sales at a much quicker rate than that observed in England and Wales (where there is no such restriction) during the same period.¹⁰

Legislation in Scotland also requires displays of alcohol for consumption away from the premises to be confined to a single area of the store. One recent study has shown that end-of-aisle displays alone can increase sales by up to 46%, with the effect being equivalent to a 9% decrease in price per litre, leading the researchers to conclude that prohibiting this marketing tactic "holds the possibility of encouraging healthier lifestyle choices." 11

The concluding point to note is that all of these additional measures - tax rises, voluntary agreements, and tougher rules on promotions - whilst they can work well, to varying degrees, in reducing alcohol harms, they will work *best* when

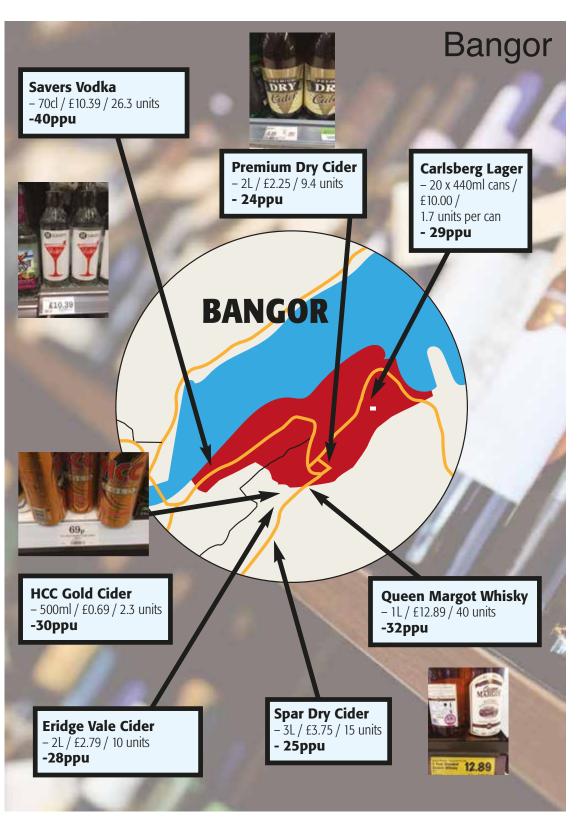
used in conjunction with MUP. This is why Alcohol Concern continues to campaign for a minimum unit price to be introduced in Wales, a targeted measure that will reduce the harms associated with alcohol misuse. The result would mean that many of the prices we found on our high streets in Wales, which are known to attract the heavier drinkers in society and cause the greatest harm, would be banished for good - improving health and, ultimately, saving lives.







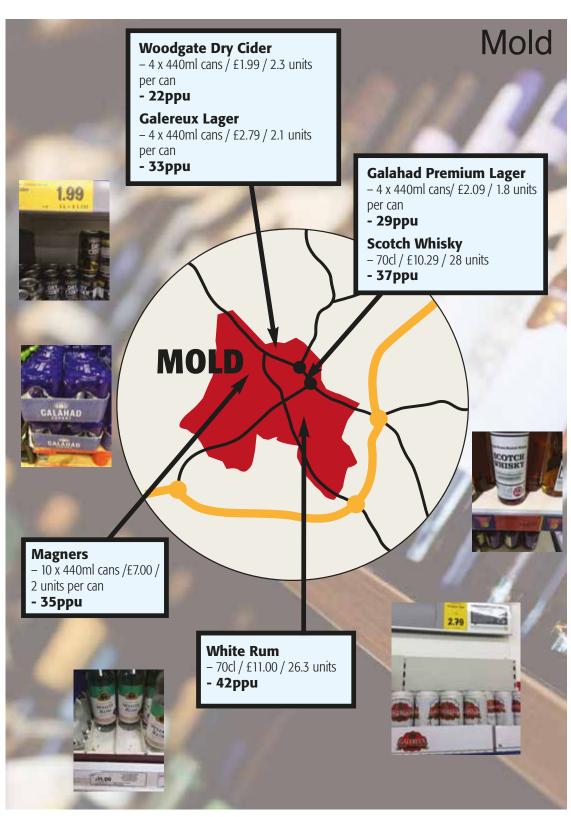




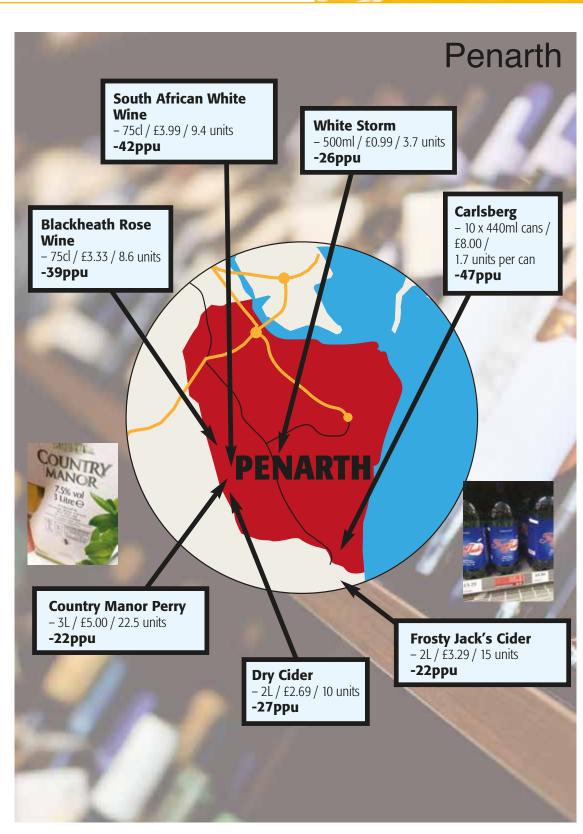




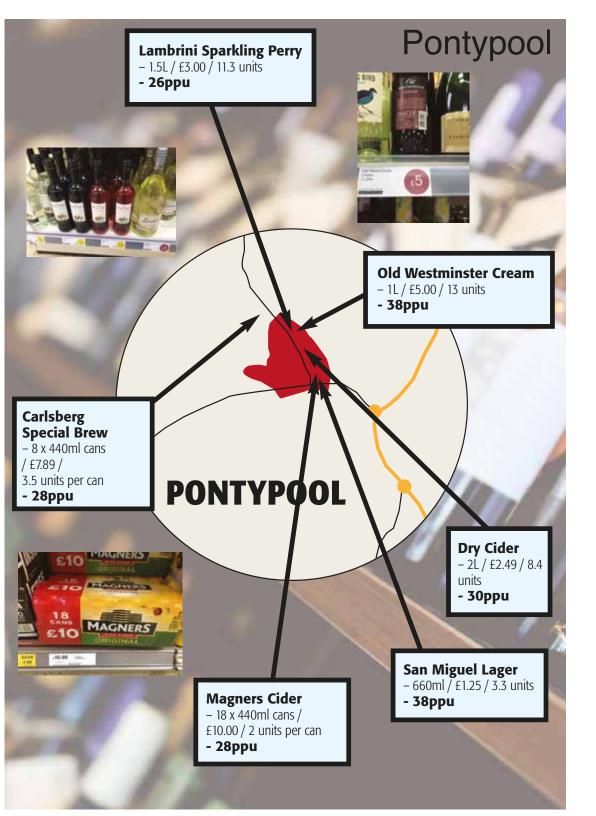




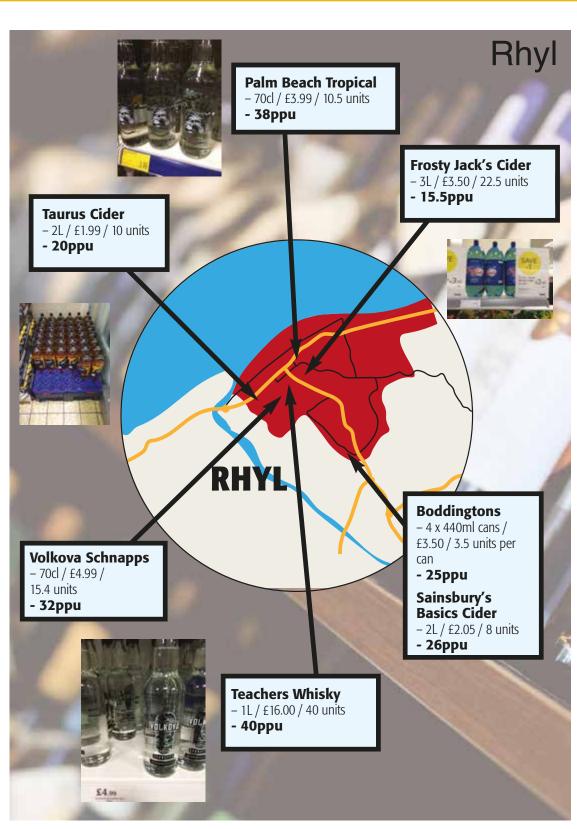












References

- See http://gov.wales/statistics-and-research/ welsh-health-survey/?lang=en [Accessed 26/02/2016].
- 2. Public Health Wales (2014) *Alcohol in Wales* 2014, Cardiff, Public Health Wales NHS Trust.
- 3. Health and Social Care Information Centre (2015), *Statistics on Alcohol England 2015*, London, HSCIC.
- 4. University of Sheffield (2014) *Model-based* appraisal of minimum unit pricing for alcohol in Wales, online, available from http://gov.wales/docs/caecd/research/2014/141208-model-based-appraisal-minimum-unit-price-alcohol-en.pdf [Accessed 24/02/2016].
- 5. Brennan, A. et al. (2014) Potential benefits of minimum unit pricing for alcohol versus a ban on below cost selling in England 2014: modelling study, British Medical Journal, doi: http://dx.doi.org/10.1136/bmj.g5452.
- 6. See https://www.gov.uk/government/collections/high-strength-alcohol-schemes-and-competition-law [Accessed 26/02/2016].

- See http://www.morningadvertiser.co.uk/Legal/ Legislation/Welsh-Government-to-push-aheadwith-alcohol-minimum-pricing-policy [Accessed 26/02/2016].
- 8. See http://news.sky.com/story/771868/labour-forced-to-put-cider-tax-on-hold [Accessed 26/02/2016]
- 9. Ally, K. A. et al. (2014) Alcohol tax pass-through across the product and price range: do retailers treat cheap alcohol differently?, Society for the Study of Addiction, 109, pp1994-2002.
- 10. Robinson, M. et al. (2013) Monitoring and Evaluating Scotland's Alcohol Strategy: The impact of the Alcohol Act on off-trade alcohol sales in Scotland, Edinburgh, NHS Health Scotland.
- 11. Nakamura, R et al. (2014) Sales impact on displaying alcoholic and non-alcoholic beverages in end-of-aisle locations: An observational study, Social Science & Medicine, 108, pp68-73.

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.

Alcohol Concern Cymru Briefing

Published by Alcohol Concern, on behalf of Alcohol Concern Cymru, 8 Museum Place, Cardiff, CF10 3BG

Tel: 029 2022 6746

Email: acwales@alcoholconcern.org.uk Website: www.alcoholconcern.org.uk Copyright: Alcohol Concern March 2016 All rights reserved. No part of this publication may be produced, stored in a retrieval system, or transmitted by any means without the permission of the publishers and the convright holders.

Alcohol Concern is a registered charity no. 291705 and a company limited by guarantee registered in London no. 1908221.

