NHS Health Scotland welcomes and shares the vision that Government has set out in *Changing Scotland’s relationship with alcohol: a discussion paper on our strategic approach* of a Scotland where moderate, responsible drinking is the norm. We are delighted to see that the proposed actions in the discussion paper reflect the evidence for change that NHS Health Scotland has presented to Government.

We agree with Government that Scotland’s relationship with alcohol is undermining our potential as a country and welcome the clear assessment of the nature and scale of alcohol related harm in Scotland and the recognition that there is need for considerable action if we are to change this situation. However, much work is required to ensure the fullest possible public and professional understanding of, and support for, the range of Government measures proposed.

Alcohol adversely impacts on individuals, families and communities in numerous ways and the case Government has presented in the consultation document for a comprehensive, whole population and multi-faceted approach in order to effectively address this situation is compelling. It is encouraging to see Government’s proposed strategic approach underpinned by a series of radical evidence-informed proposals and informed by learning from wider international policy development and implementation experience. The proposed move away from a more narrowly focussed strategic approach focussing on younger drinkers and binge drinking is welcome.

More specifically we wish to make the follow points in relation to the key strategic themes and actions outlined in the consultation document:

**Reducing consumption**

We are pleased to see recognition of the strong evidence of the close relationship between consumption and alcohol-related harm and we are supportive of the range of measures designed to reduce alcohol consumption in Scotland.

The proposed action to end the promotion and loss-leading of alcoholic drinks in licensed premises is important and extending the measures in the new licensing act to off-sales is particularly welcome. The plans to introduce a minimum retails price based on the strength of alcoholic drinks, applied consistently across premises is an important measure. However, this would need to be set high enough to have the desired effect of reducing consumption but not so high that it encourages illegal trade.

In relation to the proposal to raise the minimum purchase age to 21 for off-sales purchases, there is evidence from the US that raising to 21 the age of legal sale of alcohol from all outlets can reduce alcohol related harm. There is very limited evidence for the effects of raising the age for off-sales only. Such a measure does appear to set a precedent for treating 18-21s differently and it will clearly be unpopular in that age group with the potential for unintended consequences. Given the shortage of evidence, we therefore recommend more extensive piloting of the measure in one or more suitable areas of the country before making a final decision on national implementation. We believe
that the views of young people should be taken into account in relation to this proposed measure. However, until such times as new legislation is introduced it is vital that existing legislation is rigorously enforced.

We are delighted that Government recognise that there is currently over provision in relation to the number of licensed premises and off-sales outlets on Scotland. A continuation of this situation will only continue to fuel our already high levels of consumption. We are pleased that public health considerations are to play an important part in licensing decisions as part of the new Licensing (Scotland) Act.

Supporting families and communities
Protecting children and young people from alcohol related harm is clearly an important priority for future alcohol strategy in Scotland and the consultation document outlines an important range of initiatives. Parents and guardians have a key role and we are supportive of efforts to better inform and support parents and guardians.

The proposed social responsibility fee for some alcohol retailers is a measure we support and one which we believe will help some parts of the alcohol industry to gain a greater understanding of the range of consequences of their actions and business decisions.

Positive attitudes, positive choices
Changing Scotland’s drinking cultures and relationship with alcohol is vital if Government’s vision of a Scotland where moderate, responsible drinking is the norm is to be achieved. Action on a number of different levels will clearly be required in order to achieve this. A debate which engages the public, as well professional audiences, on what a responsible drinking culture in Scotland will look like we believe will help build support for the change required in Scotland.

NHS Health Scotland, along with our key partners, believe that public and professional understanding of guidance in relation to responsible drinking limits and the concept of units of alcohol is an important issue which requires to be clarified. A simple, clear message promoted to public and professional audiences is essential if the public and professional audiences are to develop a better understanding of responsible drinking. NHS Health Scotland would welcome the opportunity to work closely with Government to clarify the responsible drinking message and associated information and to stimulate debate and inform public opinion. The development and implementation of a social marketing strategy has an important contribution to make in this regard and Health Scotland feel that we have considerable knowledge and expertise in this area and an opportunity to contribute to this component of the strategic approach is one which we would welcome.

We recognise that the alcohol industry in Scotland is complex and includes producers, retailers and the hospitality industry. However, we wish to see all the component parts of the alcohol industry demonstrate that they are serious about contributing to a new population approach to reducing alcohol consumption and related harm in Scotland and ensuring that the marketing and sale of alcohol is undertaken in a responsible manner and within the law. A challenge for the alcohol industry is to clearly outline how they plan to contribute to Government’s vision of a Scotland which has a healthier relationship with alcohol.

Government’s proposed radical new strategic approach will of course be a key challenge right across Scottish society. In order to ensure that alcohol and alcohol related harm is
genuinely everyone’s business sectors such as the health service; local government; the formal and informal education sectors; the community and voluntary sector and private industry will benefit from reviewing current and determining future contributions to the alcohol agenda in Scotland.

One specific area where tougher Government action would be welcome is in relation to alcohol industry sponsorship of sporting and cultural activity in Scotland. A continuation of alcohol industry support for sporting and cultural activity is inconsistent with the approach outlined in the consultation paper and has the potential to undermine much of the benefit that will be accrued by the range of measures outlined. It is important that where there are policy issues which Scotland does not have sole responsibility for, such as alcohol advertising, price and product labelling, that Scottish Government continue to discuss these with Westminster Government and European Commission colleagues and advocate for change consistent with the aim of reducing consumption and ensuring that alcohol is sold and marketed in a responsible way.

We are pleased to see that the important contribution of the workplace in managing alcohol related harm effectively is recognised. The Scottish Centre for Healthy Working Lives (SCHWL) continues to play a crucial role in assisting public and private sector employers to develop and implement effective alcohol policies and we trust Government will continue to recognise and support their important work.

Whilst we are strongly supportive of a population approach to change we hope that diversity in the population is also recognised and the information and support needs of populations such as students and older people will be an integral part of Government’s new strategic approach and initiatives aimed at these audiences can be informed with current good practice.

We strongly support the introduction of separate checkouts for the purchase of alcohol as over time this will help to first denormalise and second reposition Scotland’s relationship with alcohol.

**Improved support and treatment**

The strong emphasis on the need for improved support and treatment for those affected by alcohol related harm is welcome. It is important that a range of effective treatment options are in place for individuals and family members affected by alcohol.

However, it needs to be recognised that treatment and support services will therefore require to be adequately resourced over a long period of time. Government emphasis on the delivery of alcohol brief interventions in a range of healthcare settings is likely over time to identify a greater number of individuals drinking in a harmful and hazardous way. However, it is likely that screening will also identify more dependent drinkers, many of whom may benefit from specialist treatment and support services. In order to support service commissioners to make best use of the resources at their disposal guidance from Government on evidence based treatment models and approaches as part of the Reforming delivery agenda may be helpful.

An important overarching aspect of the consultation document is the strong emphasis on minimising the considerable burden of alcohol related harm for those living Scotland’s most deprived communities. This is welcome and we assume
that a full equality impact assessment of the proposed strategic approach will be undertaken before implementation commences.

NHS Health Scotland is well placed to continue and expand its significant contribution to Government’s vision of a flourishing Scotland which has a more balanced and healthier relationship with alcohol and looks forward to working closely with Government to support the ongoing implementation of future alcohol strategy for Scotland and the development of a comprehensive evaluation framework related to the strategy.

NHS Health Scotland
September 2008