

IMPROVING  
SCOTLAND'S  
HEALTH



# Minimum Unit Pricing of Alcohol

**Consultation Report:  
Analysis of Responses**



Scottish Government  
Riaghaltas na h-Alba  
gov.scot

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# 1. Executive summary

The purpose of this report is to provide a summary to the analysis of the responses to the Scottish Government's consultation (<https://consult.gov.scot/alcohol-policy/minimum-unit-pricing/>) on the preferred minimum unit price of 50 pence per unit of alcohol. The reasons for introducing a minimum unit price of 50 pence are set out in the consultation document.

A total of 130 responses were received – 66 from organisations and 64 from individuals. Of the 130 responses, 70 (53.8%) commented on the Scottish Government's preferred minimum unit price of 50 pence. Of these 70, 48 were responses from organisations and 22 were from individuals.

- 52 (74.3%) of the respondents who commented on the proposed price of 50 pence per unit were supportive of this price.
- 12 (17.1%) of the respondents who commented on the proposed price of 50 pence per unit stated that the minimum unit price should be higher than 50 pence per unit.
- Four (5.7%) of the respondents who commented on the proposed price of 50 pence per unit stated that the minimum unit price should be lower than 50 pence per unit.
- Two (2.9%) commented on the price but were not explicit about whether or not they support the proposed price of 50 pence per unit.

Analysing the above, 64 (91.4%) of respondents who comment on the proposed price are either in favour of a 50 pence per unit price or a higher minimum unit price.

Of the 70 respondents who commented on the proposed price, 30 (42.9%) mentioned how the minimum unit price might be altered in the future. Of these 30, 21 (70.0%) wanted the proposed 50 pence minimum unit price to be reviewed after a period of time and then altered in relation to specific economic indices such as inflation. Conversely, nine of the 30 respondents (30.0%) stated that the proposed price of 50 pence per unit should remain for the full five year period.

The remainder of the responses did not comment on the proposed price specifically but instead provided comment on the principle of minimum unit pricing. The main themes emerging from these are provided within the report.

## 2. Introduction

The Scottish Parliament passed legislation in 2012 which allows the Scottish Ministers to introduce a system of minimum unit pricing for alcohol. The legislation was then challenged in court, and this delayed the implementation of this important public health policy. On 15 November 2017, the UK Supreme Court confirmed that the legislation which allows minimum unit pricing to be introduced is lawful.

The Scottish Government plans to introduce minimum unit pricing for alcohol on 1 May 2018. Before this is introduced, the Scottish Ministers ran a public consultation from 1 December 2017 to 26 January 2018 on the proposed price of 50 pence per unit. The preparation, evaluation and revision of food law requires a consultation to take place under EC Article 9 of Regulation 178/2002, and the fixing of a minimum unit price of 50 pence falls within this requirement. The consultation asked “*We invite comments on the proposed minimum price of 50 pence per unit which is set out in the draft Scottish Statutory Instrument at Annex A.*” The consultation was carried out through the Citizen Space online portal although some responses were received by email. Published responses will be available through the Citizen Space portal.

This report sets out the responses received to the consultation and provides an analysis of these. The findings presented summarise the views of those who participated in the consultation. Given that this was a self-selected group, these findings should not be seen as representing the views of the wider population. This report aims to provide a balanced account of the views submitted by respondents. However, the findings only provide a relatively high-level summary of a range of more detailed responses.

### 3. Analysis

There was only one open ended question in this consultation. Quantitative analysis of the responses was undertaken using frequency analysis. This categorised participants by sector/individual and their support of the suggested price. The results are presented in tables in the report. Qualitative, thematic analysis was used on all responses to identify key themes in response to the question. The analysis and report was completed by a Scottish Government analyst.

#### 3.1 Demographics

A total of 130 written responses were received as part of the consultation. Of these 130 responses, 64 (49.2%) were from individuals and 66 (50.8%) were from organisations. The respondents were asked “*We invite comments on the proposed minimum price of 50 pence per unit which is set out in the draft Scottish Statutory Instrument at Annex A.*” Many individual responses did not discuss the proposed price and instead indicated whether or not they were in support of the principle of minimum unit pricing.

In terms of types of organisations who responded, the table below summarises these. The majority of these organisations who responded are either public or third sector health bodies, 36 of 66 respondents (54.5%); with 21 of the 66 respondents (31.8%) from the alcohol industry and 8 (12.1%) from non-health public sector bodies.

**Table 1.1 Types of organisation responding to the consultation**

<b>Type of Organisation</b>	<b>Number</b>
Public Sector Health Body	25 (37.9%)
Third Sector Health Body	11 (16.7%)
Industry Body	12 (18.2%)
Public Sector Body (non-Health)	8 (12.1%)
Producer	6 (9.1%)
Retailer	3 (4.5%)
Other	1 (1.5%)
Total	66 (100%)

## 3.2 Responses to the proposed 50p minimum unit price

Out of the 130 responses, 70 (53.8% of the total number of responses) commented on the preferred minimum unit price of 50 pence. This was broken down into 48 organisations and 22 individuals. Whilst some respondents confined their comments to a 50 pence minimum unit price, others suggested that the price should be either higher or lower than 50 pence. The detail is set out in the table below:

**Table 1.2 Responses commenting on the proposed 50 pence price**

	<b>Preferred 50 pence</b>	<b>Higher than 50 pence</b>	<b>Lower than 50 pence</b>	<b>Other*</b>	<b>Total</b>
<b>Organisations</b>	38 (79.2%)	6 (12.5%)	2 (4.2%)	2 (4.2%)	<b>48</b>
<b>Individuals</b>	14 (63.6%)	6 (27.3%)	2 (9.1%)	0 (0%)	<b>22</b>
<b>Total</b>	<b>52 (74.3%)</b>	<b>12 (17.1%)</b>	<b>4 (5.7%)</b>	<b>2 (2.9%)</b>	<b>70</b>

\*These responses commented on the proposed price but were not explicit as to their preferred level of price.

It is evident from the table above that the majority of the respondents who commented on the 50 pence minimum unit price were in support: 74.3% in total. Support for the proposed 50 pence minimum unit price was higher among organisations (79.2%) than individuals (63.6%).

## 3.3 Varying the minimum unit price

Of the 70 respondents who commented on the proposed price, 30 (42.9%) mentioned how the minimum unit price might be altered in the future.

Of these 30, 22 (73.3%) wanted the proposed 50 pence minimum unit price to be reviewed after a period of time and then altered in relation to specific economic indices such as inflation. Four (18.2%) of these 22 respondents mentioned that the minimum unit price should be reviewed no later than two years after implementation. The majority of the 22 respondents were from organisations and these were in the main public sector and third sector health organisations.

Conversely, nine of the 30 respondents (27.0%) stated that the proposed price of 50 pence per unit should remain for the full five year period. Those respondents prefer that the evaluation programme takes place over five years and any change in price is

considered at that juncture. These eight respondents were all from organisations, the majority of these being from the alcohol industry.

The free text nature of responses meant that the length, subject matter and content of responses varied greatly. Many of the respondents did also mention caveats or issues with regards to the principle of minimum unit pricing.

### **3.4 Themes mentioned on the principle of a minimum unit price**

Many of the respondents to the consultation mentioned specific queries, issues or concerns that they had with the principle of minimum unit pricing as a policy. These were not directly related to the proposed 50 pence per unit price but are reported on below for completeness. Many of these matters will be covered in the refreshed Business & Regulatory Impact Assessment and in the upcoming Guidance on Implementation, both of which will be available at [www.minimumunitpricing.scot](http://www.minimumunitpricing.scot).

These are detailed below:

- The wide ranging evidence base supporting minimum unit pricing was mentioned as being a factor in some respondents support of the principle of the policy as well as the proposed price of 50 pence per unit. There are three responses which are more critical of the evidence base and raise particular concerns. One of these respondents disputed aspects of the econometric modelling work undertaken by the University of Sheffield, thought that the proposed 50p per unit would have negative economic impacts and proposed an alternative mechanism of minimum pricing, based on banded rates according to strength.
- The importance of a robust and wide ranging evaluation programme for minimum unit pricing was raised. A number of respondents mentioned specific potential impacts that they considered the evaluation should look into such as the impact minimum unit pricing may have on the retail sector, on dependent drinkers and on alcohol-related harm.
- A number of respondents provided comment on the implementation of the policy and specifically a concern that the period of implementation might be too short to sufficiently prepare and implement the policy on 1 May 2018. These were mainly respondents from organisations who were thinking about how their own organisation/ members of their trade body was/were preparing for minimum unit pricing and the measures that would need to be put in place by 1 May 2018.
- Some responses mentioned the impact minimum unit pricing might have on the cost of living and on lower income households particularly. These respondents

considered that the increase in price for low-cost high strength alcohol would impact most on those who live in lower income households and that it is a measure targeted “at the poor”. A small number of respondents considered that minimum unit pricing constituted a “nanny state” or unfair tax and that those living in Scotland were at a disadvantage compared to those living in the rest of the UK. These were mainly responses from individuals. There was a concern that there may be additional cost implications associated with minimum unit pricing of alcohol, specifically illegal activities which may result as a consequence of increasing the price.

- Some respondents raised the additional revenue that may be generated by minimum unit pricing, who would receive this and how it would be spent. A number of these respondents thought this would be to the benefit of larger retailers. Most of the respondents who mentioned this stated that they would like this revenue to be used to fund the NHS or health services in general. This was raised by both individual respondents and those from organisations.
- Respondents commented that minimum unit pricing would not, in general, reduce the alcohol consumption of dependent drinkers nor those who drink to harmful or hazardous levels. Some stated that individuals will continue to buy the same volume of alcohol but will spend less on other household essentials such as food. Other respondents raised concerns that those who drink to harmful levels who can no longer afford this will turn to a different substance or alternatively to financial crime in order to sustain their alcohol consumption. These were mainly responses from individuals.
- Education and raising awareness of alcohol-related harms is mentioned by a small number respondents, both those from individuals and organisations. These respondents considered that education of young people, advertising and public awareness campaigns should be used in conjunction with minimum unit pricing.
- Some respondents highlighted that minimum unit pricing may lead to an increased demand for alcohol treatment and recovery services. These mentioned the impact that a minimum unit price might have on dependent drinkers. Respondents hoped that the introduction of minimum unit pricing might provide an opportunity to increase awareness of addiction issues as well as treatment and recovery services.
- The growth of cross-border shopping, online sales and illicit trading and the impact that this may have on the Scottish economy was raised by a number of respondents. Some respondents considered that minimum unit pricing provided a motivation for those buying low-cost alcohol to travel to England or to buy alcohol online which would be despatched from England. Neither of these would

be subject to minimum unit pricing. Some of these respondents queried whether minimum unit pricing may lead to an increase in financial crimes such as theft. This was raised by both individual respondents and those from organisations.

**How to access background or source data**

The data collected for this social research publication:

are available via the Citizen Space online portal at:

<https://consult.gov.scot/alcohol-policy/minimum-unit-pricing/>

## 4. Conclusion

The consultation invited comments on the Scottish Government's preferred minimum unit price of 50 pence. Out of the total number of responses of 130, 70 responded to the proposed price directly. Of these 70, 52 (74.3%) indicated that they are in favour of the 50 pence minimum unit price. Sixty-four of the 70 respondents (91.4%) who commented on the proposed price are either in favour of a 50 pence per unit minimum price or a higher minimum unit price.

Many respondents commented on issues concerning the principle of minimum unit pricing as a policy, but that was not what was being consulted upon. The principle of minimum unit pricing was consulted upon previously:

<http://www.gov.scot/Publications/2009/02/24154414/0>

Of those respondents commenting on the principle of minimum unit pricing, the main themes identified were:

- Evidence base;
- Evaluation;
- Implementation;
- Impact on cost of living / lower income households;
- Increased revenue to the alcohol industry;
- Impact on harmful drinkers;
- Education / awareness;
- Treatment and recovery services;
- Cross border / illicit sales / online sales.

Many of these matters are covered in the refreshed Business & Regulatory Impact Assessment which covers the impact the policy will have on many of the above groups and sectors. The Scottish Government will be issuing guidance on the implementation of minimum pricing at 50 pence per unit, and this has been produced in conjunction with those involved in the process including retailers, wholesalers, producers, Licensing Standards Officers, Police Scotland. Both of these documents will be available at [www.minimumunitpricing.scot](http://www.minimumunitpricing.scot).

Taking account of a range of factors, including the responses to this consultation, the Scottish Government concludes that a minimum unit price of 50 pence per unit provides a proportionate response to tackling alcohol misuse, as it strikes a reasonable balance between public health and social benefits and intervention in the market. Scottish Ministers will now proceed to propose to the Scottish Parliament that a minimum price of 50 pence per unit is introduced from 1 May 2018.



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