

Submitted to Alcohol: Minimum Unit Pricing (MUP): Continuation and Future Pricing: Consultation
Submitted on 2023-11-22 15:48:56

Ministerial Foreword

Questions

1 Do you think Minimum Unit Pricing (MUP) should continue?

Not Answered

2 If MUP continues, do you agree with the proposed Minimum Unit Price of 65 pence?

Not Answered

3 We invite comments on the Scottish Ministers' proposal to continue MUP, and the proposed Minimum Unit Price of 65 pence.

Comment below:

The IoL favours and supports licensing policy which is evidence led, probative and proportionate.

The IoL is aware that there have been public claims of there being strong evidence showing that MUP reduced deaths and hospital admissions directly caused by alcohol consumption, but these claims appear worthy of further scrutiny and consideration.

Of the many relevant studies within the portfolio, only one study found that the policy had positively impacted these health outcomes. However, the claims made in that study are based on theoretical modelling, rather than reality, when compared to trends in England during the same period.

As a result, the study does not provide evidence that the introduction of MUP 'saved lives'. Instead it provides a theoretical illustration of what might have happened had MUP not been introduced. It is disconcerting to note that the number of alcohol attributable deaths in Scotland has risen.

All of the other studies relevant to this area found no evidence to support the hypotheses that the introduction of MUP would reduce alcohol-related health harms.

We accept that the nature of MUP and the potential for outcomes across a range of areas may mean that the effectiveness of the policy cannot be reliably assessed using the traditional methods of observing and assessing an experiment. However, the theory-based approach detailed in the Public Health Scotland (PHS) report does not take account of the majority of evidence. Rather than looking at all of the evidence as a whole and drawing conclusions based on the strongest indicators, the PHS report would appear to have selected the evidence that best supports the theorised outcomes, even when that evidence is in the minority or has fundamental flaws in its ability to prove the purported impacts.

For the reasons stated, our conclusion is that the perceived benefits of MUP on which the policy is founded do not appear to have been realised, on a proper analysis of the research published by the Scottish Government.

We should be clear that the IoL has no fundamental opposition to MUP per se and would not wish to comment on what level is an appropriate level for a minimum price to be set at. It may be appropriate to revisit taxation of specific alcohol types as an alternative to MUP

We are supportive of a strong, robust licensing policy based on the concomitance of the available evidence. It is only through robust and probative policy that good law can be made and on our reading of the Scottish Government and PHS reports, the claim that MUP has been a success is questionable.

About you

What is your name?

Name:
Sue Nelson

Are you responding as an individual or an organisation?

Organisation

What is your organisation?

Organisation:
The Institute of Licensing

If you are responding on behalf of an organisation, please tell us the type of organisation for which you are providing a response.

Other

If other, please share the type of organisation in the box provided:

The Institute of Licensing (IoL) is the professional body for licensing practitioners across the UK. Our membership comprises regulatory (local authority and police) industry and private practice professionals across Scotland, England, Wales and Northern Ireland.

Further information about your organisation's response

Please add any additional context:

The Institute of Licensing (IoL) is pleased to take the opportunity to respond to this consultation and has done so in consultation with its members within Scotland, utilising a mixed group of experienced member practitioners from regulatory and private practice.

The IoL would be happy to engage with the Scottish Government in discussing proposals and options in relation to MUP and any other licensing matter.

The Scottish Government would like your permission to publish your consultation response. Please indicate your publishing preference:

Publish response with name

Do you consent to Scottish Government contacting you again in relation to this consultation exercise?

Yes

What is your email address?

Email:
sue@instituteoflicensing.org

I confirm that I have read the privacy policy and consent to the data I provide being used as set out in the policy.

I consent

Evaluation

Please help us improve our consultations by answering the questions below. (Responses to the evaluation will not be published.)

Matrix 1 - How satisfied were you with this consultation?:

Neither satisfied nor dissatisfied

Please enter comments here.:

Matrix 1 - How would you rate your satisfaction with using this platform (Citizen Space) to respond to this consultation?:

Neither satisfied nor dissatisfied

Please enter comments here.: