



Quaker Action on Alcohol and Drugs

Registered Charity No: 1059310
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Director: Helena Chambers
21, Church Street,
Tewkesbury
Gloucestershire GL20 9PD
Telephone: 01684 299247
E- mail: helenagaad@hotmail.com
Website: www.qaad.org.uk

RESPONSE TO THE REVIEW OF ALCOHOL TAXATION LED BY THE HOME OFFICE AND HMRC

Quaker Action on Alcohol and Drugs (QAAD) is a listed group of the Religious Society of Friends (Quakers). QAAD is an independent national charity that has a concern with the use and misuse of all drugs, legal, illegal and prescribed, and with gambling. QAAD offers prevention and information services for Quakers, including for young Quakers. We also contribute to public debates and consultations on matters relating to our concern and experience. Trustees give their time to QAAD freely, and bring voluntary and statutory experience from settings that include prevention, treatment, medical services and criminal justice. QAAD does not represent the Religious Society of Friends as a whole, but the views we express are grounded in our Quaker principles.

Introductory comments

- We welcome the fact that this review is taking place,, and particularly that the relationship between price, affordability, and alcohol-related harm is being acknowledged.
- Approximately half of violent crime is estimated to be related to alcohol misuse.
- At present interventions to address alcohol misuse in prisons and in the criminal justice system as a whole are very poorly developed. Those with alcohol problems as a major or contributory factor are at risk of further offending on release.
- At the 'lesser' but much more widespread level of disorder and nuisance, a significant part of the policing effort is tied up by people who are intoxicated. At key times these may present in such numbers that existing laws on disorder cannot be enforced. Local Authority budgets are strained to deal with the clean-up.
- Harms are not confined to crime and disorder, or to a small minority of people. 26% of adults drink over recommended health limits ('Safe, Sensible, Social' NHS consultation paper, p 12), whilst the NHS bill is now estimated to be £2.7 billion annually.
- The affordability of alcohol doubled between 1970 and 2001 (Prime Minister's Strategy Unit, 2003) whilst recent estimates suggest it is 69% more affordable than it was in 1980. The tax regimen must rebalance if harms are to fall.
- Price is a particularly critical influence on young people's drinking (Bellis et al,¹), including on early teenagers, whom the Chief Medical Officer has recommended should not drink at all. While deaths from cirrhosis appear to have stabilised recently (after a

¹ Bellis, M et al (2007) Predictors of risky alcohol consumption in schoolchildren and their implications for preventing alcohol-related harm *Substance Abuse Treatment, Prevention, and Policy* **2**:15

69% rise in men during the years between 1987 and 2001 in England and Wales²) rates amongst people of middle years escalated sharply between 1991 and 2007³.

- We hope that the human costs of over-consumption - not all of which can be quantified - will be considered within the equation. (Childline, for example, is receiving 100 calls a week from children adversely affected by their parents' drinking.)

The aim of taxation

- The system of tax and excise duty on alcohol has grown up with trade and revenue raising as the prime drivers. Now that the relationship between price, affordability, consumption and harm is attested by a wealth of international research, policy aims need to be reconfigured.
- Public health and well-being should be the prime consideration of the tax regime, with the aim of harm prevention (rather than of generating revenue to deal with the aftermaths).
- The tax regimen needs to embody and reinforce health messages about responsible drinking by relating a unit of alcohol to the price that is paid for it.
- A tax regimen that fails to address what the consumer actually pays (through such practices as deep discounting) will not be effective in terms of public health goals.
- The system needs to affect on and off trade outlets.

Proposals

- The cumulative effect of the evidence that has been widely rehearsed elsewhere leads to a system of minimum pricing per unit of alcohol. This is accepted by NICE, the Royal College of Physicians, the British Medical Association.
- This would be the most effective control of elasticity. It would also affect alcohol equally in all the forms that it is sold, and militate against the 'switching' of drinks that can occur if the costs of some forms of alcohol rise, whilst others remain cheaper as regards their alcohol content.
- We would welcome a tax on spirits that raised the price from the very low levels that are available in some outlets to bring the cost up to something in the region of 50p per unit. However, this would need to be part of a wider system to be effective.
- Minimum pricing is the only policy that provides an integrated system which will work coherently across all drinks over all outlets.
- One of the significant factors in recent years is that alcoholic drinks have tended to become stronger. The bandings for the taxation of cider, beer and wine are wide, with the majority of alcoholic drinks falling within a single key category (8-15% proof for wine, for example). From a health perspective, two small glasses of 14% wine would bring a woman over the recommended daily maximum of 2-3 units, whilst a 10% wine would place her within it. High strength ciders, beers, and lagers are twice as strong as more moderate brews.
- Consideration should be given to changing taxation bandings into smaller classifications, either in terms of a sliding scale, or finer categories (for example, 10-12% and 13-15% for

² Leon, D and McCambridge, J Liver Cirrhosis mortality rates in Britain from 1950 to 2002 The Lancet, Vol 367, Issue 9504

³ Office of National Statistics, quoted in 'Future proof,' Coghill, Miller and Plant, 2009

wine) with higher duties being applied to the higher strength drinks and incentivising lower levels for lower alcohol drinks. The same principle could be applied to ciders, beers and to 'Ready to Drink' mixers. This would influence personal decisions about consumption, and provide an economic driver for production to shift to lower alcohol drinks.

- Whilst there has been some discussion about not selling alcohol below cost price, the large sums spent on advertising and promoting alcohol are usually not to be included. A levy on alcohol promotions would be one way of addressing this.

Concluding remarks

Previous policy approaches to alcohol have been weakened by a piecemeal and inconsistent approach between government departments. We hope that the coalition government will accept the challenge of developing a taxation system that gives an economic basis for an integrated approach based on public health.