

**Changing Scotland's relationship  
with alcohol: a discussion paper on  
our strategic approach**



**CAMPAIGN  
FOR  
REAL ALE**

**A Submission from CAMRA,  
The Campaign for Real Ale**

**September 2008**

## **1.0 Executive Summary**

- 1.1 An effective alcohol harm reduction strategy should only consist of measures that can be proven to target those whose drinking puts them at high risk and harms wider society. CAMRA, The Campaign for Real Ale will not support untargeted measures that impact on the vast majority for whom alcohol is a positive part of their lives.
- 1.2 Well run community pubs provide a safe and supervised environment for people to enjoy a drink and social etiquette encourages people to drink sensibly.
- 1.3 CAMRA strongly supports the proposal to introduce a minimum retail price per unit of alcohol provided that the minimum price is around 35p to 40p per unit. The minimum price should be linked to RPI inflation to ensure that the minimum price retains its value.
- 1.4 If a Social Responsibility Fee is to be introduced it must fully apply to the off trade and Local Authorities must be given the freedom to exempt well run community pubs from paying the fee.
- 1.5 While not specifically objecting to an increase in the minimum purchase age in the off trade, CAMRA is concerned that such a move may create a precedent for increasing the minimum purchase age in the on trade in the future, a move that CAMRA would not support.

## **2.0 Introduction**

- 2.1 CAMRA, The Campaign for Real Ale is a consumer organisation that seeks to promote real ale, well run pubs and the interests of consumers. CAMRA has over 93,000 individual members in the UK, over 2,800 of whom live in Scotland.
- 2.2 CAMRA works to promote and improve the image, quality, availability and variety of real ale. Real ale is a product that can be enjoyed responsibly as part of a healthy lifestyle. As a distinctive product, primarily sold in public houses, real ale is not a major contributor to the problem of alcohol misuse or alcohol related disorder or nuisance.
- 2.3 CAMRA works hard to promote and protect well run community pubs and believes such pubs play a vital role in encouraging the sensible consumption of alcohol. The key to tackling alcohol misuse is increasing the proportion of alcohol consumed in well run community pubs. Well run community pubs provide a safe and supervised environment for people to enjoy a drink and social etiquette encourages people to drink sensibly. Community pubs also play a key role in fostering community activity and engagement and provide an affordable night out for a huge range of people.
- 2.4 Excessive alcohol consumption and public disorder linked to drunkenness are unacceptable and need to be tackled through targeted measures. A targeted approach would identify those who abuse alcohol and through a combination of education, medical intervention and legislative action persuade these people to reduce their alcohol consumption.
- 2.5 CAMRA will support measures that can be proven to target those whose drinking puts them at high risk and harms wider society. As a consumer organisation CAMRA will not support untargeted measures that will impact on the vast majority of people who drink without putting themselves at high risk and for whom alcohol is a positive part of their lives.
- 2.6 People should be expected to exercise personal responsibility for their alcohol consumption and behaviour. The Government can encourage people to take this greater self responsibility by providing objective information; removing the price incentive for people to drink in unregulated environments and ensuring existing laws are effectively enforced.

### **3.0 Reducing Alcohol Consumption**

- 3.1 An alcohol strategy with the primary objective of reducing overall alcohol consumption will not necessarily assist in controlling the drinking of those at high risk of harming themselves and wider society. Such a strategy risks alienating the vast majority of people who choose to drink responsibly. The primary aim of any alcohol strategy should be to reduce alcohol related harm rather than simply reduce overall alcohol consumption.
- 3.2 It is misleading to suggest that the level of average alcohol consumption is directly linked to the level of alcohol related harm. The level of average alcohol consumption is heavily influenced by demographic and societal change. The increase in average alcohol consumption since the 1950's is partly a result of an increase in the number of women who drink along with a fall in the proportion of the population below drinking age. During the 1990s there was only a slight increase in overall weekly alcohol consumption among men but a much more marked one among women.<sup>1</sup>
- 3.3 The National Statistics General Household Survey records a decline since 2002 in the proportion of men drinking more than 21 units a week and in the proportion of women drinking more than 14 units.<sup>2</sup> This fall occurred despite the average UK consumption remaining static between 2002 and 2006.<sup>3</sup> This demonstrates that a reduction in the number of people drinking above recommended limits can be achieved without the need for a corresponding fall in overall alcohol consumption.
- 3.4 The overall level of alcohol consumption in Scotland is significantly lower than in the rest of the UK. In Scotland the average weekly consumption of alcohol was only 11.6 units compared to 13.5 units in Wales and 13.7 units in England.<sup>4</sup>

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<sup>1</sup> General Household Survey 2006 – Smoking and drinking among adults 2006. p.52

<sup>2</sup> *ibid*

<sup>3</sup> British Beer and Pub Association - Statistical Handbook 2007 p.36

<sup>4</sup> General Household Survey 2006 – Smoking and drinking among adults 2006. p.59

## 4.0 Irresponsible promotions and below cost selling

- 4.1 CAMRA strongly supports proposals to:
- prevent off-sales premises from supplying alcohol free of charge on the purchase of another product
  - prevent off-sales premises from supplying alcohol at a reduced price on purchase of another product
  - prevent the sale of alcohol as a loss leader
- 4.2 CAMRA also strongly supports the proposal to introduce a minimum retail price per unit of alcohol provided that the minimum price is around 35p to 40p per unit. The minimum price should be linked to RPI inflation to ensure that the minimum price retains its value.
- 4.3 Regulation of irresponsible alcohol price promotions meets the test of targeting those who are most likely to drink excessively putting themselves at high risk and harming wider society.
- 4.5 National Statistic's figures show that men who drink below recommended weekly limits are more likely to have visited a pub than they are to have purchased alcohol from the off trade. Men drinking above recommended weekly limits are more likely to have purchased alcohol from the off trade than to have visited a pub.<sup>5</sup>
- 4.6 Independent omnibus survey questions commissioned by CAMRA support the view that licensed premises are the most appropriate environment for the consumption of alcohol. 53% of all adults agreed with the statement that "Community pubs are the best place for adults to drink alcohol responsibly" and only 18% disagreed with the statement that "community pubs promote responsible drinking".<sup>6</sup>
- 4.7 Despite repeated public pressure many off sales premises, notably supermarkets, have continued to sell alcohol at huge discounts. The following supermarket promotions are examples of the hugely discounted prices available<sup>7</sup>:

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<sup>5</sup> Of men drinking between 11 – 21 units a week 54% report having visited a pub in the previous week compared to only 47% who brought alcohol from the off trade. Of men drinking 22 units a week or more 61% report having visited a pub but 72% report having brought alcohol from the off trade. - Eileen Goddard – Drinking: Adults behaviour and knowledge – omnibus survey report (National Statistics, 2008)

<sup>6</sup> CAMRA Tracking Omnibus Survey: July 2008 – CAPI OmniBus TNS

<sup>7</sup> Examples taken from advertising during August 2008

- Sainsbury's – Fosters – 3 cases for £20– **equivalent to 57.4 pence a pint or 25.28 pence per unit of alcohol**
- Asda – John Smiths Smooth – 3 cases for £20 – **equivalent to 57.4 pence a pint or 25.28 pence per unit of alcohol**
- Morrisons – 24 cans of Stella Artois for £15.47 – **equivalent to 77.9 pence a pint or 26.4 pence per unit of alcohol**
- Lidl – Carlsberg – 8 cans for £4.49 – **equivalent to 56.9 pence a pint or 26.3 pence per unit of alcohol**

4.8 Irresponsible price promotions cannot be addressed through self regulation due to competition law. This view is echoed by Tesco's Executive Director for Corporate and Legal Affairs, Lucy Neville-Rolfe, who is quoted as saying that:

“Competition law prevents businesses discussing anything to do with price with each other and imposes severe penalties on anyone who breaches it. The only safe solution is for the Government to initiate and lead these discussions and to bring forward legislative proposals which Tesco and others in our industry can support.”<sup>8</sup>

4.9 The increased affordability of alcohol, reflected in the smaller proportion of disposable income spent on alcohol, is being driven by the off trade rather than the on trade. The following key trends in the beer market illustrate this point:

- The percentage of beer consumed in community pubs has fallen from 87.7% in 1980 to 57.4% in 2006.<sup>9</sup>
- The price of beer sold in the off trade increased by only 39% between 1988 and 2007 compared to an increase in RPI inflation over the same period of 93%.<sup>10</sup>

4.10 On trade beer prices have increased above the rate of inflation over the last 20 years. Between 1988 and 2007 the cost of beer in community pubs increased by 141% compared to an RPI inflation increase of 93%.<sup>11</sup> As a result visiting the pub has become a less affordable activity for all those who rely on pensions or state benefits linked to RPI inflation and for lower paid workers who have been unable to secure above inflation pay rises.

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<sup>8</sup> Joe Sinclair - Tesco backs pricing call over binge drinking – The Independent Newspaper, 21st February 2008

<sup>9</sup> British Beer and Pub Association - Statistical Handbook 2007 p.20

<sup>10</sup> Calculated from figures published in William Davies (ed) – Focus on Consumer Prices Indices for July 2008 (National Statistics) sec. 4.1.

<sup>11</sup> ibid

## 5.0 Minimum Purchase Age

- 5.1 Whilst not specifically objecting to an increase in the minimum purchase age in the off trade CAMRA is concerned that such a move may create an unwelcome precedent for increasing the minimum purchase age in the on trade at some point in the future.
- 5.2 A study, undertaken by the Centre for Public Health, Liverpool John Moores University, found that over half of young people drink alcohol at home or at friends' houses before visiting a pub or club in order to cut the cost of a night out. This trend is known as pre-loading. Those who pre-loaded were four times more likely to consume over 20 units on a night out and two and a half times more likely to have been in a fight.<sup>12</sup> Increasing the minimum purchase age for off sales could inhibit the growth of pre loading by people aged 18-21 by making it more difficult for them to buy alcohol for consumption at home.
- 5.3 The impact of increasing the minimum purchase age for off trade sales is likely to be limited by those aged 18 – 21 asking parents or older friends or siblings to buy alcohol on their behalf. Given that drinking at 18 would remain lawful in pubs it is unlikely that there would be any stigma attached to buying alcohol on behalf of someone who is 18 - 21. It is possible that any growth in the amount of alcohol brought on behalf of others may make it easier for under 18's to get access to get alcohol through this route. Those aged 18 -21 would also have the option of traveling to England to buy alcohol or purchasing alcohol via mail order.
- 5.4 Despite concerns over enforcement there are benefits to increasing the minimum purchase age for off trade purchases as an attempt to encourage an end to pre-loading and the trend towards alcohol consumption in unsupervised environments. However, given that the key driver behind young people drinking at home is cost, this objective could be better achieved by focusing on measures to reduce the huge price differential between beer sold in the on trade compared to beer sold in the off trade.

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<sup>12</sup> Summary of research available at <http://www.addictionjournal.org/viewpressrelease.asp?pr=67>

## **6.0 Social Responsibility Fee**

- 6.1 CAMRA believes that allowing Local Authorities to impose a new levy on community pubs as an unfair tax on the vast majority who drink and behave responsibly. Community pubs will be forced to pass on the cost to consumers through a combination of higher prices and reduced investment.
- 6.2 It must be clearly set out in regulations that money raised by a Social Responsibility Fee is to be additional to existing funding and only for purposes of pursuing licensing objectives.
- 6.3 The burden of any Social Responsibility Fee will fall hardest on the on trade leading to a further increase in the differential between on trade and off trade prices, something which this consultation is trying to address. There is a real risk that large sections of the off trade will avoid paying the Social Responsibility Fee by virtue of being located in out of town locations and by arguing that alcohol sales are merely incidental to the sale of other products. To ensure community pubs with low turnovers are not disproportionately hit the fee could be based on alcohol volumes sold. If the Social Responsibility Fee is to have credibility it must ensure that both the on and off trade are impacted on equally.
- 6.4 Local Authorities must be given the option to exempt well run community pubs and community pubs from paying the Social Responsibility Fee. The following could be used as the basis of criteria to decide on exemptions for well run community pubs:
- Past compliance with licensing laws
  - Trouble free history
  - Mixed age of customers
  - Opening hours
  - Size

## 7.0 Other Issues

- 7.1 **Promotional Material.** While we would support a restriction on off trade premises displaying promotional material, relating to alcohol special offers, visible outside their premises we do not believe that this same restriction should apply to on trade premises. As currently worded, this proposal could prevent community pubs from advertising the fact that they serve locally brewed real ales, cider or UK wines. Consideration should be given to exempting on trade premises from this restriction. If this is not possible the restriction should be amended so as to prevent the promotion of specific brands but to allow generic promotions. It is important that community pubs are able to promote the fact that they serve real ale, locally brewed beers, and are accredited for the quality of their beer.
- 7.2 **Separate Alcohol Checkouts.** The proposal for separate alcohol checkouts in off trade premises would assist in avoiding the impulse purchase of alcohol for consumption at home or in another unsupervised environment. It would also enable staff selling alcohol in the off trade to achieve the same level of expertise and responsibility that is already demonstrated by the vast majority of those selling alcohol in the on trade. Combined with measures to prevent irresponsible off trade price promotions this will encourage people to give greater consideration to off trade alcohol purchase.

## **About CAMRA**

CAMRA, The Campaign for Real Ale is a not-for-profit independent voluntary consumer body which exists to promote and defend access to full-flavoured and distinctive beer and the best features of the British pub.

CAMRA was founded in 1971 and our membership is currently over 93,000.

CAMRA's mission is to act as the champion of the consumer in relation to the UK and European drinks industry. Its aims are as follows:

**Maintain consumer rights**

**Promote quality, choice and value for money**

**Support the public house as a focus of community life**

**And campaign for greater appreciation of traditional beers, ciders and perries as part of national heritage and culture**

The Campaign is funded by member subscriptions, sales of publications and products and proceeds from beer festivals. Other than revenue from advertising in our member's newspaper *Whats Brewing* and certain specific sponsorship, it is not funded in any way by the industry. Only individuals can join CAMRA.