

Scottish Episcopal Church

General Synod of the Scottish Episcopal Church
Scottish Charity No SC015962

General Synod Office
21 Grosvenor Crescent
Edinburgh EH12 5EE
Tel: 0131 225 6357
Fax: 0131 346 7247
email: office@scotland.anglican.org
website: www.scotland.anglican.org



Dr Richard Simpson MSP
Room MG-21
Scottish Parliament
Edinburgh
EH99 1SP
e-mail: Richard.Simpson.msp@scottish.parliament.uk

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Dear Sir

Shifting the Culture: Proposed Alcohol (Public Health and Criminal Justice) (Scotland) Bill

On behalf of the Church in Society Committee of the Scottish Episcopal Church, I write with a short submission in relation to the proposed Bill.

Representatives from a number of Christian denominations met to discuss the proposals set out in "Shifting the Culture". An ecumenical group then created the following statement:

Alcohol is no ordinary commodity. Churches since their earliest days have used wine historically, symbolically and with theological significance for occasions of celebration; however, we recognise that alcohol can be used abusively and as such, can cause damage to human relationships. A longstanding commitment to the wellbeing of the Scottish people leads us to recognise the importance of a holistic approach to tackling the harm caused by a culture of alcohol abuse in Scotland. We welcome the provisions of the Alcohol etc. (Scotland) Act 2010, and the proposals for Minimum Unit Pricing in the Alcohol (Minimum Pricing) (Scotland) Act 2012. Viewed together with the existing objectives as set out in the Licensing (Scotland) Act 2005, these measures demonstrate the leading role taken by Scotland in taking steps to reduce this harm, and we urge that further action in this area be placed above party political differences for the benefit of all in Scotland.

The Church in Society Committee of the Scottish Episcopal Church in its earlier submission (Dec 2012) supported the principle of minimum pricing for alcohol but within an overall strategy for the reduction of alcohol consumption. The Committee urged the Scottish Government to consider the wider issues to change the culture of drinking in Scotland. In this regard the contribution of "Shifting the Culture" is generally welcomed.

Questions and Responses

The Committee offers the following in response to the questions raised by the proposal.

Tightening Quantity Discount Ban in Alcohol etc. (Scotland) Act 2010

1) Do you think the further restriction on quantity discounting proposed would be beneficial? What disadvantages might there be? Do you think there is a case for going further?

Affordability and ready availability of alcohol are significant contributors to a culture of alcohol over-consumption in Scotland and have a significant effect on consumption patterns, especially amongst the young and those who consume the most alcohol. Popular “Alcopops” or blended juices with alcohol would not increase greatly in price with the minimum pricing initiatives per unit of alcohol, yet sales volumes may increase with quantity discounting. Consumers may also respond to a rise in the cost of alcohol by purchasing variations through quantity discounting leading to an increase in spending for stronger and more hazardous and harmful products.

Public Health Interest and Child Protection

2) Do you believe that Ministers should be required to issue guidance on these two licensing objectives?

3) Do you believe that Ministers should be required to report to the Parliament once per session, and what should such a report be required to cover?

Accountability is important and Scottish Ministers ought to state how the objectives are being fulfilled to the Scottish Parliament. The timing of reporting is a matter for those organising Parliamentary business, but consideration should be given to regular reporting with particular reference to public health interest, child protection and matters affecting vulnerable groups.

Restrictions on Alcohol Marketing

4) Do you believe that the proposed restrictions on advertising are proportionate or necessary?

5) Are there further measures you feel should be introduced?

Restricting advertising as described would be a welcomed. Guidelines on alcohol advertising are already in place, but further steps are required, with better enforcement, to prevent the unwary behaviour of consumers associating themselves with repetitive and dedicated advertising.

Caffeine Limit in Pre-Mixed Alcohol Products

6) Do you believe that there should be restrictions on caffeinated alcohol products? If so do you believe the proposed caffeine limit of 150mg/litre on pre-mixed products is appropriate?

Proposals for measures which seek to effect cultural and attitudinal change towards alcohol are welcome. Ways of reducing the consumption of caffeinated alcohol products are to be supported if evidence suggests such action would produce a comparable reduction to crime and public disorder or an advantageous gain to health and well-being, especially in the young.

Alcohol Education

7) Is there a role for further alcohol education and public information campaigns in changing alcohol culture?

8) Would it be beneficial for Ministers to be made directly accountable to the Parliament for their policy in this area, as proposed?

Alcohol education and public information campaigns should be part of a range of measures to change current culture towards alcohol. The effectiveness of such campaigns may improve if alcohol is presented in a more positive and compelling way; a commodity to be used with learning and appreciation rather than simply presenting the unhealthy and unsocialable consequences of alcohol abuse.

Alcohol Discrimination Against Under-21 Year Olds in Off-Sales

9) Do you support a ban on Licensing Boards requiring off-licences to restrict sales on age-grounds along, or are there circumstances where this could be justifiable?

The minimum age for purchasing alcohol is currently 18. Raising the age limit specifically for alcohol consumption is an arbitrary proposal when considering the necessary right of adults to be treated on an equal basis with their peers. Education to enhance adult behaviour is more important than setting arbitrary age limits.

Community Involvement in Licensing Decisions

10) Do you believe that community neighbours should be consulted and their views taken into account when licences are being renewed or extended or when special licences are being issued?

11) Do you believe that the New Zealand model is an appropriate one to emulate, if not what changes should be made?

Community involvement in decisions affecting a local area is to be supported. There are already mechanisms for local involvement through Local Licensing Boards and Local Licensing Forums and these could be made effective without need for further legislation.

National Licensing Forum

12) Do you believe that there is a role for a National Licensing Forum in addition to the existing local forums? If so:

- Should it be funded through licensing fees or central Scottish Government funding?*
- What would its membership be, and who would appoint them?*
- To whom would it be accountable?*
- What would its functions be?*

Knowledge of this issue is limited to offer any further comment.

Alcohol Bottle Tagging

13) Is there sufficient evidence to justify legislation allowing Licensing Boards to make participation in a bottle tagging scheme a licence condition, or are current voluntary arrangements adequate?

Knowledge of this subject is limited to offer any further comment.

Alcohol Fine Diversion

14) Should Fine Diversion be made available, on a statutory basis, throughout Scotland, if the further pilot is successful?

Knowledge of this issue is limited to offer any further comment.

Alcohol Arrest Referral

15) Do you believe that Arrest Referral schemes for Alcohol (as well as Drugs) should be a statutory requirement within each Community Justice Authority area?

Knowledge of this issue is limited to offer any further comment.

Drinking Banning Orders

16) Should drinking banning orders be introduced in Scotland? If so should they be piloted in one Sheriffdom?

Knowledge of this issue is limited to offer any further comment.

Alcohol and Drug Treatment and Testing Orders (ADDTO)

17) Do you believe extending DTTOs to become ADTTOs would add value to the existing range of disposal? What differences of context between drugs and alcohol would need to be taken into account?

Knowledge of this subject is limited to offer any further comment.

Alcohol Offences Information Sharing

18) Do you believe that notifying a GP about a patient's conviction for an alcohol-related offence would be beneficial? Should it apply only in cases of conviction, or in other circumstances as well?

A patient should know that a GP can help with an alcohol problem, through educational and promotional material, in prison or elsewhere, but a GP cannot initiate a relationship.

General Questions

1) Do you support the general aim of the proposed Bill?

Yes / No / Undecided

Many of the proposals in this consultation can be supported; but a holistic approach to the issue is required. The consultation is limited with regard to the influence and treatment of poverty in Scotland, the historic social conditioning to alcohol particularly over the last century, and a broader examination of the rapid changes in the trade, marketing and consumption of alcohol especially to the individual. There has been a detrimental shift in the cultural and attitudinal approach to alcohol in Scotland, which could be improved upon by promoting responsible drinking in the context of better sociable, familial and communal settings.

2) Are there further legislative (or non-legislative) changes that you would recommend, beyond those outlined in this consultation, in order to further its general aims of tackling Scotland's culture of excessive alcohol consumption?

The concentration on legislative proposals within the consultation document may limit the scope of attending to the wider problem of Scotland's relationship to alcohol consumption. As indicated in the shared ecumenical statement, tackling alcohol misuse in Scotland is an issue that should transcend party political differences.

3) What is your assessment of the likely financial implications (if any) of the proposed Bill to you or your organisation? What (if any) other significant financial implications are likely to arise?

Knowledge in relation to this issue is limited to offer any further comment.

4) Is the proposed Bill likely to have any substantial positive or negative implications for equality? If it is likely to have a substantial negative implication, how might this be minimised or avoided?

Knowledge in relation to this issue is limited to offer any further comment.

Yours faithfully



Very Rev Ian Barcroft

Convener **Church and Society Committee**