



ALL-PARTY PARLIAMENTARY BEER GROUP

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SU/DoH Consultation,
Room 4.6,
Admiralty Arch,
The Mall,
London,
SW1A 2WH

21st January 2003

Dear Sirs/Mesdames,

National Alcohol Harm Strategy Consultation

I write on behalf of the Officers of the All-Party Parliamentary Beer Group and at the specific invitation of the Minister, Hazel Blears MP. Please accept our apologies for the late submission, which as you will be aware was kindly authorised by Carol Sweetenham's office on the 15th January.

This Group, which takes a close interest in and supports the UK brewing and pubs industry, has some 330 or so members at Westminster and a sister group of some 60 UK MEPs in the European Parliament.

The Westminster Group has paid careful attention to the issue of the misuse of alcohol and its consequences since its formation ten years ago, as has the Brussels Club in the past six years or so.

In particular the groups have:-

- 1) encouraged the industry to extend the use of toughened glass where appropriate, given that in many cases its use can make a significant contribution to injury reduction, but recognising that the technology does not yet exist for the toughening of glasses with stems or of bottles.
- 2) closely followed the work of the Portman Group, particularly since the formation of the Ministerial Group on Underage Drinking, chaired by George Howarth MP

Honorary Secretary: Robert Humphreys

Pentre Farm, Pentre, Bucknell, Shropshire SY7 0BU
Telephone: 01547 520724 Facsimile: 01547 520728
Email: humphreysr@parliament.uk

VAT REG NO. 645 01 39 57

when he was at the Home Office, following ministerial and parliamentary concern over the naming, labelling and marketing of FABS (alcopops). At that time the Group's officers held a number of meetings with Home Office ministers on the matter. The Portman's Group's Director, Jean Coussins, has been invited to report on the Group's work to meetings at Westminster and in Brussels, including a presentation on the new Third Code of Practice only two months ago. The Group has been impressed with the effectiveness of the self-regulatory regime established by the Portman Group and by the workings of its independent complaints panel. Lord Condon, who chairs this Panel, attended the last meeting referred to above. The Group believes that this approach is fast, economical and effective and should continue to enjoy the Government's support.

- 3) noted with approval the development of pub-watch schemes and the national pub-watch initiative. These informal networks appear to the Group to deliver substantial benefits locally where they are adequately resourced and managed, but at a national level the picture appears somewhat patchy. The encouragement of a more consistent standard would no doubt deliver enhanced results. There may also be a case for legal enforceability to be enhanced in relation to the activities of these schemes, which the Group suggests should be considered.
- 4) given careful consideration to the issue of the legal drinking age during the deliberations of the Group's Licensing Law Reform Panel, whose work is more fully described below. The Panel was not entirely persuaded that the present main threshold of eighteen years was extrinsically justified, and in its deliberations contemplated other alternative approaches, particularly in the light of evidence taken from other European countries which were within the remit of the study. Ultimately, though, the Panel concluded, as indeed did the Home Office in its subsequent White Paper, that a reduction in the legal age might be too politically difficult if introduced in combination with so many other significant changes. While this reservation may still hold true, the Group suggests that research into the potential contribution that lowering of the legal age could make to the problems under consideration here should be commissioned by the Government.
- 5) taken a direct interest in the promotion of a single national proof-of-age card in order to assist licensees and their staff in discharging their legal responsibilities, whatever the age point might actually be. This Group has encouraged successive governments to establish an official scheme and has played a leading role in promoting the development of the PASS scheme as a second-best option. This is being given a ministerial launch on the 22nd January, and the Group believes it should significantly reduce the ease with which young people can presently obtain forged proof-of-age cards as well as contribute substantially to the primary objective, as above.
- 6) taken a close interest in world-wide research and European performance in relation to effective strategies to reduce the problem of drunken driving. In particular the Group has arranged presentations and discussions at Westminster

and in the European Parliament, as well as meetings with ministers and commissioners, involving some of the World's leading experts.

- 7) noted and encouraged the involvement of the pub industry in crime and disorder partnerships up and down the country. It appears to the Group that the industry can and should be encouraged to make a significant contribution to problem assessment and reduction through this mechanism, although informal evidence suggests that the most effective results are achieved where the industry's representatives are treated as full participants rather than merely seen as present to contribute only in respect of alcohol problems on the partnerships' agendas. The Government endorsed the industry's involvement in this project, and might usefully reinforce this to local authorities.
- 8) repeatedly raised, and especially with Treasury ministers, the extent to which beer trafficking from the Continent, induced by the substantial excise duty rate difference between the UK and its neighbours, can and does contribute to the unsupervised consumption of alcohol by the very young in particular. It is the Group's view that this particular problem is most damaging for the youngest drinkers, for whom the obtaining of alcohol through subterfuge from legally operated premises is most difficult, whereas evidence presented on many occasions to the Group strongly indicates that a number of traffickers have no compunction about sale to the well under-age. An early record of the Group's concerns in this area, and some of the evidence taken at that time, may be found in the Group's report on the whole matter of excise duty differences and their consequences, "Parliamentary Beer Club* Beer Tax Enquiry", (HMSO, 1995, ISBN 0 11 701592 X). The Group especially applauds the work of the British Institute of Innkeeping in researching and publicising these problems.
- 9) taken a very close interest in licensing law reform, not least as a means to the reduction of alcohol-related harm. At the instigation of the Home Office the Group has undertaken substantial research, including a major project to look at lessons which could be learned from Scotland and from other European Member States in relation to drink-related problems, and especially disorder and nuisance, for the benefit of the regime in England and Wales. The Group's report to the Home Office on this research (published October 1999), a copy of which was sent to the Department of Health at the time, recommends a raft of changes many of which were included in the eventual Home Office White Paper and are in the DCMS Bill presently before Parliament. In particular it recommended the abolition of fixed or zoned closing hours, and the encouragement of family use of licensed premises, as potentially significant contributors both to reducing alcohol-related nuisance and crime caused by adult drinkers now, and to better educating the young in the sensible use of alcohol in their turn.
- 10) followed world-wide research into the health benefits and dangers associated with different levels of alcohol consumption.
- 11) given its enthusiastic endorsement to the "Pub is the Hub" scheme run by Business in the Community and backed by HRH the Prince of Wales, which is devoted to

helping struggling rural pubs survive given their crucial importance at the heart of their communities.

- 12) encouraged dialogue, co-operation and collaboration at all levels between the brewing and pub industry and the agencies and communities with which it should have contact in relation to alcohol misuse.
- 13) received a presentation on the Manchester “City Safe” project, when it was especially concerned by the correlation demonstrated between the increase of relevant reported crime and changes in the type and size of licensed premises in the area.

Concerns

The Group shares the concerns expressed in the consultation document that a number of the now well-established trends in alcohol consumption, especially amongst the young, demand careful consideration and planned action. The well-established health benefits of regular modest consumption, the huge social and community benefits which the consumption of alcohol on licensed premises delivers, and the very significant employment and revenue contributions which the industry makes must nonetheless be balanced against substantial social and health costs.

At the heart of many of the problems set out in the consultation paper, though, are changing social trends in attitudes, behaviour patterns and expectations. The disinhibiting effects of alcohol can magnify such changes without being their cause.

It is therefore right to take the broadest view of society’s expectations and needs, and to exercise caution over any inclination to constrain the harmless pleasure of the majority in order to curb the excesses of the few. To illustrate the point in a trivial example, consider the case of the imposition of the use of plastic vessels in place of glass.

Another concern is that to be effective, public service messages must be plausible, as well as compelling and simple. The safe drinking messages delivered in recent years have often lost sight of this principle, and when even the moderate drinker fails to relate to the message, then the cognitive dissonance for the heavier drinker is likely to render it useless. The old weekly figures bore little relation to drinkers’ real experience, and there is a great risk that the present use of units may do the same, especially where recommended figures are too low. The real target group may be too far removed from the message for it to work.

On the question of simplicity, the Portman Group’s 2f3m4 message really cannot be given high marks.

Summary

The Group believes that

Public service messages should be plausible and simple

The Portman Group's educational and regulatory work is excellent and should be continued

Pub watch schemes should be given more attention and support

A single national proof-of-age card should in due course be introduced by the Government

Measures more specifically targeted at regular heavy drink drivers are needed and that current research on ignition interlock devices is welcome

Licensed premises are among the best places for the young to learn sensible drinking and are generally safe environments

The tax incentive for beer traffickers should be eliminated

Generalised terminal hours should be abolished to sweep away "flash points"

The trend to ever larger pubs used by narrower age groups should be further researched and possibly resisted

Family use of pubs should become the norm

The beer and pub industry's collaborative approach to other agencies is already impressive and should be further encouraged

The industry's record on the promotion of the sensible use of its products is generally excellent and should be further encouraged

I trust this is helpful. The Group's officers are extremely interested in these matters and would be pleased to be of further assistance if required.

Honorary Secretary: Robert Humphreys

Pentre Farm, Pentre, Bucknell, Shropshire SY7 0BU
Telephone: 01547 520724 Facsimile: 01547 520728
Email: humphreysr@parliament.uk

VAT REG NO. 645 01 39 57

Yours sincerely,

Robert Humphreys

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Honorary Secretary

Cc Nigel Jones MP, Chairman
Nigel Evans MP, Vice Chairman
Jane Griffiths MP, Vice Chairman
John Grogan MP, Chairman, Licensing Law Reform Panel

* As the Group was then known

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