



The Association of Directors of Public Health

Alcohol Structures Consultation

The Association of Directors of Public Health (ADPH) is the representative body for Directors of Public Health (DPH) in the UK. It seeks to improve and protect the health of the population through collating and presenting the views of DsPH; advising on public health policy and legislation at a local, regional, national and international level; facilitating a support network for DsPH; and providing opportunities for DsPH to develop professional practice.

The Association has a rich heritage, its origins dating back 160 years. It is a collaborative organisation working in partnership with others to maximise the voice for public health.

Introduction

ADPH welcomes the opportunity to respond to this consultation and would welcome any initiative introduced by the government to reduce alcohol related harm. We are a member of the Alcohol Health Alliance and our views on this topic are very closely aligned hence the similarity of the two submissions.

While we support the proposal for a new still cider and perry band, we believe that a minimum unit price (MUP) approach would be a more effective approach in addressing harm caused by alcohol, including higher strength alcohol. We would encourage a more holistic review of alcohol duty and unit pricing.

We support the findings of the recent evidence review of alcohol policy by Public Health England which concludes that reducing the affordability of alcohol through taxation and MUP is the most effective and cost effective way of reducing alcohol harms, including premature death.¹ The introduction of MUP was the number one policy priority for members in our most recent survey. 70% of DsPH who responded said this was in their top five priorities; this was also true in last year's survey when 100% of respondents put it in their top ten.

1. Do you agree that there is a case for a new still cider and perry band below 7.5% abv?

There is a strong case for introducing a new still cider and perry band below 7.5% ABV. Within the constraints of the current duty system this is likely to be an effective way of using tax to address the proliferation of cheap, high strength 'white' ciders that are often the choice for harmful, street and underage drinkers. An Alcohol Concern survey found that 50% of homeless white cider drinkers drink more than 3 litres a day, with 42% of respondents saying they have drunk it for more than 10 years.² 25% of alcohol treatment services patients in Glasgow and Edinburgh drink white cider, and of these 45% drink it exclusively.³

¹ Public Health England, 'The public health burden of alcohol: evidence review', December 2016:
<https://www.gov.uk/government/publications/the-public-health-burden-of-alcohol-evidence-review>

² Goodall, T. (2011). *White Cider and Street Drinkers: Recommendations to reduce harm*. London: Alcohol Concern.

³ Black, H. et al (2014) *White Cider Consumption and Heavy Drinkers: A Low-Cost Option but an Unknown price*. *Alcohol and Alcoholism* 49:6, pp675-80



According to Thames Reach, which works with rough sleepers in London, “Super-strength drinks have become one of the biggest causes of premature death of homeless people in the UK, and our figures indicate that super-strength drinks are doing more damage than both heroin and crack cocaine”. 78% of the deaths in Thames Reach hostels are attributed to high strength alcohol.⁴ White ciders have been consistently found to be among the top drinks chosen by young people who are known to have alcohol-related problems.⁵ According to Alcohol Concern cider is the most frequent type of drink consumed by children under 15 years old.⁶

Due to anomalies in the tax system these drinks are the cheapest products on the market on a per unit basis, with 3 litre bottles containing as much alcohol as 22 shots of vodka available for as little as £3.49. Studies of white cider drinkers have indicated 75-85% favour it for its low price.⁷

Cider of 7.5% ABV attracts the lowest level of duty of any alcohol product at any strength. For example, a 500ml can of cider at this strength generates 19p of duty, less than a third of the duty on a can of beer of equivalent size and strength (69p). Several ciders are produced at exactly this ABV to exploit the duty structure. A new duty band for high strength ciders between 5.5% and 7.5% and below would go some way to reducing these perverse incentives.

2. Where do you think the lower threshold should be set? Please provide evidence to support your answer. We would also welcome any evidence about reducing the alcohol content of ciders.

We believe that the lower threshold of the new duty band should be set at 5.5% ABV. It should primarily aim to raise the price of strong white cider rather than encourage strong cider producers to reformulate, as reformulation is likely to result only in modest changes to products and to levels of alcohol consumption. However, a new band of duty could simultaneously raise the price of some products, and encourage others to be reformulated. A wide band would increase the magnitude of reformulation and so deliver greater benefits.

3. In volume terms, how does the still cider market breakdown by strength in 0.1% abv increments?

While we do not have access to a detailed market breakdown we do know from NHS Scotland’s Monitoring and Evaluating Scotland’s Alcohol Strategy (MESAS) project that ‘strong cider’ accounted for 18% of all cider sales in England, and 21% of all sales in Scotland in 2015.

The precise definition of this category is not publicly available, but from context it seems likely to be 7.5%

⁴ Thames Reach (2017), Calls for high-strength cider duty increase. Available here: <http://www.thamesreach.org.uk/news-and-views/calls-for-high-strength-cider-duty-increase/>

⁵ See, for example: Alcohol Concern (2015). *Alcohol brands consumed by young people in treatment 2015*. Available at http://www.alcoholconcern.org.uk/wp-content/uploads/2015/06/Alcohol-Brands_Young-People.pdf; Alcohol Concern (2013). *Alcohol brands consumed by under-18s in contact with young people’s drug and alcohol services*; Alcohol Concern (2012). *Alcohol brand consumption by ‘at risk’ underage drinkers: consumptive behaviours of under-18s in contact with Drug and Alcohol Services*.

⁶ Alcohol Concern (2015), op. cit., p3.

⁷ Black et al (2014) op. cit.



ABV and above. The MESAS data draws on the best available market research sources.

4. We would welcome evidence on the impacts a new still cider and perry band could have. This includes, but is not limited to, the impacts on: (1) businesses, (2) consumers, and on (3) public health.

Harmful alcohol consumption comes at a major cost to public health and wider society. It accounts for over a million hospital admissions⁸ and 23,000 deaths⁹ in England each year, and accounts for 10% of the total UK burden of death and disease.¹⁰ Public Health England recently found that 167,000 years of working life were lost to alcohol in 2015, more than the ten most frequent types of cancer combined.¹¹ This comes at a social cost that has been estimated between £21 billion and £52 billion.¹²

Raising the price of alcohol is widely recognised as one of the most effective ways to address alcohol harm.¹³ The new duty rate should push up the price of the cheapest products on the market, with the consequence that the most harmful drinkers will be able to purchase and consume less for their money. This should reduce death and illness from alcohol and associated social harms.

Targeting higher bands of duty on the strongest alcohol has worked in the past. The current top band for ciders is credited with shrinking the market for products above 7.5% from 20% in 1996 to less than 2% today.¹⁴ Similarly, the market for super-strength beer and lager in England and Wales declined by 23% in the two years following the introduction of a new, higher duty band for such products in 2011.¹⁵

While a new band of cider duty could significantly reduce harmful drinking, it would be unlikely to have much effect on the vast majority of consumers. As noted above, relatively few mainstream ciders are stronger than 5.5% ABV – over 80% of the cider sold in the UK would be completely unaffected.¹⁶ Because mainstream high strength ciders are much more expensive than white ciders, a duty increase would have a smaller impact on the final retail price, since duty comprises a much smaller proportion of the total price.

5. Would a new band for still wine above 5.5% up to 8.5% abv encourage innovation in the lower strength wine market?

Previous steps to encourage lower strength alcohol through the duty system have met with modest success. For example, sales of low and no alcohol beer rose by 33% in England and Wales between 2010

⁸ HSCIC (2016), *Statistics on Alcohol England, 2016*.

⁹ Institute of Alcohol Studies (2016), The health impacts of alcohol. Available at: <http://www.ias.org.uk/Alcohol-knowledge-centre/Health-impacts.aspx>

¹⁰ Balakrishnan R et al (2009): the burden of alcohol-related ill health in the United Kingdom, *Journal of Public Health* 31:3, pp366-373.

¹¹ Public Health England (2016), The Public Health Burden of Alcohol and the Effectiveness and Cost-Effectiveness of Alcohol Control Policies: An evidence review, p40.

¹² Burton, R. et al (2016), A rapid evidence review of the effectiveness and cost-effectiveness of alcohol control policies: an English perspective, *The Lancet* doi: [http://dx.doi.org/10.1016/S0140-6736\(16\)32420-5](http://dx.doi.org/10.1016/S0140-6736(16)32420-5)

¹³ World Health Organization (2013), *Global Action Plan for the prevention and control of noncommunicable diseases 2013-2020*

¹⁴ National Association of Cidermakers (2010) *A Response to the Alcohol Taxation Review*

¹⁵ NHS Health Scotland (2016), op. cit.

¹⁶ Ibid.



and 2012¹⁷, with further growth predicted¹⁸ apparently driven by the introduction of a lower rate of duty for beers between 1.2% and 2.8% ABV in October 2011. However, as of 2015, they still accounted for only 0.1% of the market.¹⁹

6. We would welcome evidence on non-tax barriers to the growth of the lower-strength wine market.

No comment.

7. We would welcome evidence on the current and future performance of the lower-strength wine and made-wine markets, including information on volumes sold.

MESAS data indicates that 0.5% of all wine sold in England and Wales (0.4% in Scotland) in 2015 was 'low alcohol', though the precise definition of this category is unclear.²⁰

We note that the volume of made wine between 1.2% and 5.5% sold has increased sharply in recent years, with the market growing by 117% between 2011/12 and 2015/16, compared to 18% for wine as a whole.²¹ This segment is increasingly significant, with made wine sales amounting to 2.5 million hectolitres a year, compared to 12.9 million for grape wine.²²

8. We would also welcome evidence on the practicalities of reformulation for wine and made-wine producers.

No comment.

9. The government would welcome evidence on the impacts of introducing a new band (on still wine) on: (1) businesses, (2) consumers, and (3) public health.

The effectiveness of encouraging lower strength alcohol as a policy for reducing alcohol-related harms is unproven but worth exploring. Its success depends, first, on consumers who switch from higher to lower strength products not increasing their volume consumption, though one recent academic review suggested that this phenomenon is "implausible and largely theoretical", with little evidence of it in randomised trials.²³

However, it also depends on lighter drinkers not increasing their consumption. There is also a danger that consumption of lower strength products is additive rather than substituting for higher strength products.

¹⁷ Ibid.

¹⁸ Hook, S. (2016), Tesco aims to be top for no/low alcohol, *Off-Licence News* (13 December). Available here: http://offlicencenews.co.uk/news/fullstory.php/aid/16239/Tesco_aims_to_be_top_for_no_low_alcohol.html

¹⁹ Ibid.

²⁰ NHS Health Scotland (2016), op. cit.

²¹ HM Revenue & Customs (2017), Alcohol Bulletin January 2017. Available here: <https://www.uktradeinfo.com/Statistics/Pages/TaxAndDutybulletins.aspx>

²² Ibid.

²³ Rehm, J. et al (2016), Evidence of reducing ethanol content in beverages to reduce harmful use of alcohol, *Lancet Gastroenterology & Hepatology* 1:1, pp78-83.



The net health effects of a new band of duty on lower strength wine are ambiguous, but potentially positive.

10. If the government decides to introduce a new still wine band, should the new duty band also be applied to still made-wines?

We would support application of the same principles, or a similar approach to cider.

11. What impacts would a new still made-wine band have?

No comment.

12. Do you think introducing a new still wine and made-wine band could create adverse incentives for producers to increase their alcohol strength of some of their drinks? If so, how large an effect would you expect this to be?

No comment.

13. Are there any other factors that the government should consider in relation to a new duty band for wine and made-wine?

Care would need to be taken around the labelling of wines within this duty band. Labelling of these products as “low” alcohol wines, rather than “lower” alcohol wines, would be potentially misleading to consumers who may mistakenly believe that they are drinking lower amounts of alcohol than the reality, and which could result in adverse health consequences, drink driving and so on. This is particularly relevant given that nearly 30% of regular wine drinkers in the UK are not aware of the alcohol level in their typical bottle of wine.²⁴

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²⁴ Wine Intelligence (2012), op. cit.