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Llywodraeth Cymru
Welsh Government

Welsh Government
Consultation – Summary of Responses

Consultation on the Proposed Level of the
Minimum Unit Price for Alcohol

February 2019

Mae'r ddogfen yma hefyd ar gael yn Gymraeg.
This document is also available in Welsh.

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Introduction

The Public Health (Minimum Price for Alcohol) (Wales) Act 2018 (the Act) gives effect to the Welsh Government's determination to provide a legislative basis for addressing some of the long-standing and specific health concerns around the effects of excess alcohol consumption in Wales. The Act makes provision for the minimum price for which alcohol is to be sold or supplied in Wales by certain persons and makes it an offence for alcohol to be sold or supplied by alcohol retailers from qualifying premises below that price.¹ When it is brought into force, it will put in place a series of offences and penalties relating to the new system and provides additional powers and duties for local authorities to enable them to enforce the legislation.

The Act provides a formula for calculating the applicable minimum price for alcohol by multiplying the percentage strength of the alcohol, its volume and the minimum unit price, allowing us to specifically target the sale and supply of that low-cost and high-strength alcohol. The Act provides that the minimum unit price for the purposes of the Act will be specified in regulations.

Ahead of laying the regulations before the National Assembly for Wales for its consideration, the Welsh Government issued a 12 week consultation (28 September to 21 December 2018) on its preferred level of a 50p minimum unit price – to gather views from individuals, businesses, public bodies and other stakeholders. As part of this consultation, draft regulations were also published, accompanied by a draft Explanatory Memorandum and Regulatory Impact Assessment.

A total of 148 consultation responses were received. This document provides a summary of the key themes and issues raised in the written responses.

¹ These terms have a specific meaning for the purposes of the Act, as set out in sections 3 and 4 of the Act.

Policy context

The level of alcohol consumption in Wales has led (and continues to lead) to a range of health and social harms, particularly for those people who drink excessively. In 2017, there were 540 alcohol-related deaths in Wales, an increase from 504 in 2016 and 463 in 2015. In 2017-18, there were also just under 55,000 alcohol-attributable hospital admissions in Wales.² Analysis by the University of Sheffield has estimated that alcohol costs the NHS £159m a year in Wales.³

The Welsh Government has long been clear that a pricing intervention must be a key component of any comprehensive strategy to tackle alcohol misuse, not least because the affordability of alcohol has increased significantly over the past two decades.

The Welsh Government has twice consulted about the principle of introducing a minimum price for alcohol in Wales – in 2014 as part of the Public Health White Paper⁴ and in 2015 on a draft Public Health (Minimum Price for Alcohol) (Wales) Bill.⁵ The Public Health (Minimum Price for Alcohol) (Wales) Bill introduced to the National Assembly for Wales in October 2017 and was approved by the Assembly in June 2018. The Bill received Royal Assent in August 2018.

The Public Health (Minimum Price for Alcohol) (Wales) Act 2018 reflects a firm commitment to further improving and protecting the health of the population of Wales and forms part of a wider and continuing programme of work to tackle alcohol-related harm. The ultimate objective of minimum pricing is to tackle alcohol-related harm, including alcohol-attributable hospital admissions and alcohol-related deaths in Wales, by reducing alcohol consumption in hazardous and harmful drinkers. In particular, it is targeted at protecting the health of hazardous and harmful drinkers (including young people) who tend to consume greater quantities of low-cost and high-alcohol content products.

² Public Health Wales (2018) Data Mining Wales: The annual profile for substance misuse 2017-18. NHS Wales.

³ Angus, C., Holmes, J., Brennan, A. and Meier, P. (2018) Model-based appraisal of the comparative impact of Minimum Unit Pricing and taxation policies in Wales: Final report. Cardiff: Welsh Government.

⁴ 2014 Consultation on the Public Health White Paper Listening to you: Your health matters. <https://gov.wales/betaconsultations/healthsocialcare/white-paper/?lang=en>

⁵ 2015 Consultation on the Draft Public Health (Minimum Price for Alcohol) (Wales) Bill. <https://gov.wales/betaconsultations/healthsocialcare/alcohol/?lang=en>

About the consultation

The 12 week consultation on the Welsh Government's preferred level of the minimum unit price for alcohol was launched on 28 September 2018 and closed on 21 December 2018. The full text of the consultation is available at:

<https://beta.gov.wales/setting-minimum-unit-price-alcohol>

The consultation was intended to gain views from a range of stakeholders to inform the level of the minimum unit price to be specified in regulations, for the purposes of the Public Health (Minimum Price for Alcohol) (Wales) Act 2018. The consultation was not about the principle of minimum unit pricing, as the Welsh Government has consulted twice before (in 2014 and 2015) on this matter.

Based on analysis by the University of Sheffield on the impacts of minimum unit pricing published in November 2017 and February 2018⁶ (plus the wider evidence base set out in the Explanatory Memorandum and Regulatory Impact Assessment for the Bill)⁷ the consultation on the preferred level of the minimum unit price noted the following:

“Taking into account a range of factors, the Welsh Government considers a 50p minimum unit price would be a proportionate response to tackling the health risks of excessive alcohol consumption and strikes a reasonable balance between the anticipated public health and social benefits and intervention in the market.”⁸

The consultation was published on the Welsh Government website. Information on the consultation documents and how to respond was widely distributed and shared via social media. Information was also shared with the NHS Equalities Leads, Welsh Government Equalities Networks, the Children's Commissioner, the Older People's Commissioner, the Future Generations' Commissioner, the End Child Poverty Network, Alcohol Brief Intervention Practitioners and Public Health Wales Alcohol Leads. Articles were also included in the Chief Medical Officer's Newsletter and the Department for Health and Social Services Newsletter.

⁶ An Interim Report on the impacts of a 50p Minimum Unit Price was published in November 2017. A full report on the impacts of different levels of MUP ranging from 35p to 70p in five pence increments was published in February 2018. These reports can be accessed here:

<https://gov.wales/statistics-and-research/research-likely-impact-public-attitudes-towards-minimum-unit-price-alcohol/?lang=en>

⁷ The Explanatory Memorandum and RIA for the Bill were last updated in June 2018. The latest version can be accessed here: <http://www.assembly.wales/laid%20documents/pri-ld11577-em/pri-ld11577-em-e.pdf>

⁸ Welsh Government Consultation Document (September 2018) Minimum Unit Pricing for Alcohol. <https://beta.gov.wales/setting-minimum-unit-price-alcohol>

The consultation was also promoted using the Welsh Government (Substance Misuse) Mobile Digital Advertising Van. A digital advert was used on the van, which was driven to different locations across Wales in November and December 2018 (until the close of the consultation), with the view to sharing information on the consultation and encouraging people to respond. The consultation was also highlighted by the Minister for Health and Social Services on social media (for example, during Alcohol Awareness Week in November) and at specific events (for example, at an event organised by the British Liver Trust on 14 November). Officials also attended the Public Health Wales Conference on 8 and 9 November and shared information with over 120 delegates – and also attended a Drink Wise Age Well event, to promote the consultation.

In addition, emails were sent to over 100 individuals and organisations, which included the Chairs of Area Planning Boards (APBs), APB Regional Leads, substance misuse service providers, service user organisations, members of the Welsh Government Alcohol Industry Network, members of the British-Irish Council, Trading Standards, Local Authority Chief Executives – as well as members of the public who signed up for updates / responded to the previous consultation on the draft Bill.

During the consultation period, meetings were also held with stakeholders, service providers, Area Planning Boards, local authorities, the Welsh Heads of Trading Standards, retailers and representatives from the alcohol industry. Three engagement meetings were held with service users (in Gwent, RCT and Cardiff and the Vale) and Children in Wales ran two workshops with children and young people (in north and south Wales). A list of all stakeholder meetings and a summary of the key themes to emerge from this engagement is included as part of this summary.

About this summary of consultation responses

This document provides a summary of the consultation responses received through:

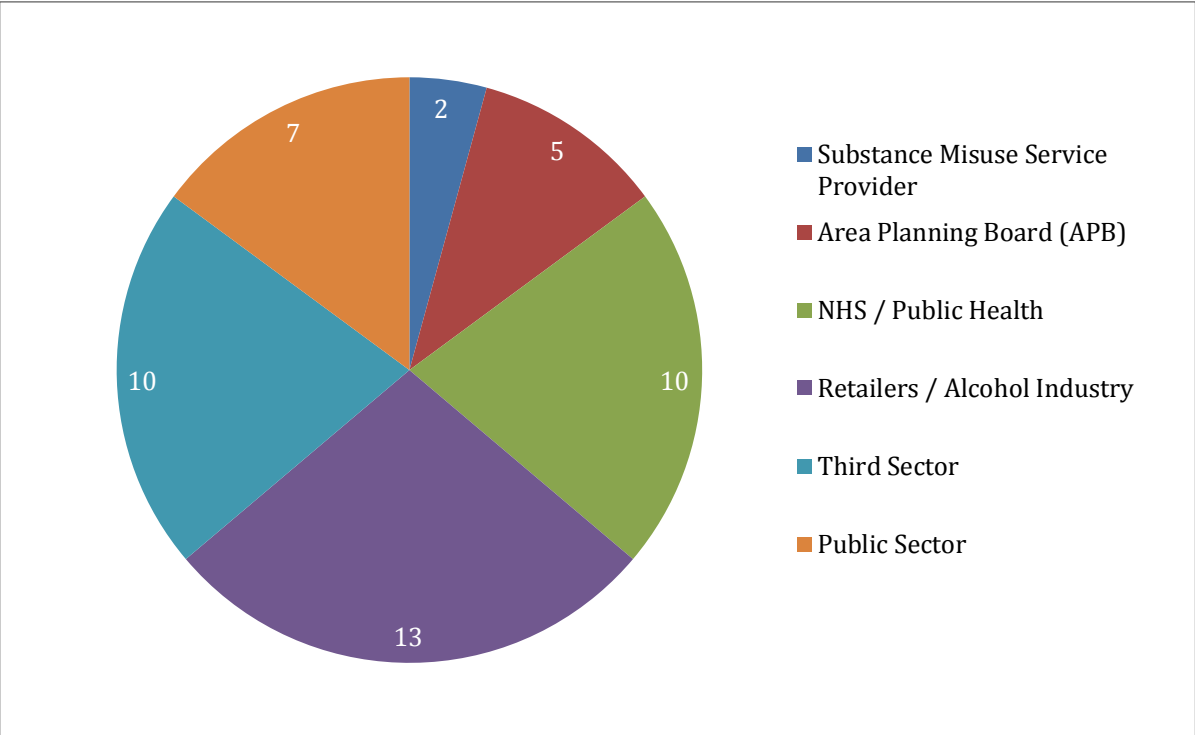
- The online consultation.
- Paper copies or alternative electronic copies of the consultation.
- Meetings and events with stakeholders.

Consultation responses

In total, **148 responses** were received.

- 118 of these were received as online consultation responses, while the other 30 were received as hand-written or typed consultation forms.
- 61 respondents selected to remain anonymous.
- 47 responses were identified as a response from an organisation, while 101 were identified as being from an individual.
- Figure 1 below provides a breakdown of the organisations which responded to the consultation.

Figure 1: Organisations responding to the consultation



Analysis of the consultation responses – Methodology

A thematic analysis of the 148 responses was undertaken. This categorised the opinions, comments, statements and issues raised by respondents into overarching themes, for each of the consultation questions. Themes outside the scope of the main consultation questions were also identified – which mainly related to the principle of minimum pricing for alcohol, as opposed to the specific level of the minimum unit price to be specified in regulations. The themes identified in the responses relating to the principle of minimum pricing have also been summarised.

Summary of consultation responses

Underpinning the consultation on the preferred level of the MUP for alcohol were two key questions:

Question 1: We invite comments on the draft regulations included in annex one which set out the proposed minimum unit price of 50p.

Question 2: If you believe a different level of a minimum unit price should be set, please set out your reasons and any research and evidence to support your view.

Of the 148 responses, 95 commented on the Welsh Government's preferred minimum unit price of 50p. Some commented specifically on the level as part of consultation question 1, while others did in response to consultation question 2 and question 5.

- Of those 95 respondents who commented specifically on the proposed level of the MUP of 50p, 43 were responses from organisations and 52 were from individuals.
- 58 (61%) of the respondents who commented on the proposed price of 50p per unit were supportive of the Welsh Government's preferred level.
- 9 (9%) of the respondents who commented on the proposed price of 50p per unit stated that the minimum unit price should be higher than 50p per unit.
- 13 (14%) of the respondents who commented on the proposed price of 50p per unit stated that the minimum unit price should be lower than 50p per unit. Five of these specifically stated that the level of the MUP should be zero.
- 15 (16%) of respondents commented on the price but were not explicit about whether or not they support the proposed price of 50p per unit.
- Out of the 148 responses, 55 stated that there should be no minimum unit price introduced for alcohol.
- A small number of responses stated it would not be appropriate for them to comment specifically on the level of the MUP (or said they did not have a view). This included a

small number of Third Sector organisations and those representing retailers / the alcohol industry.

Questions 1 and 2:

Key themes from responses supporting a 50p MUP

When commenting on the preferred level of the MUP, a number of key themes emerged from the responses of those supporting a 50p MUP. Particular reference was made to the research carried out by the University of Sheffield and the **anticipated health gains** of introducing a 50p MUP, whilst also recognising the need for balance and proportionality, in terms of interference in the market. Responses commented that a 50p MUP was “a fair price” / “a sensible place to start” / “a good place to start” / “a reasonable price to set” – and that “there is an overall logic to the proposals”.

Anticipated health gains and the need for proportionality:

“...We believe that the case for imposing a minimum unit price is overwhelming and that an initial level of 50p strikes the right balance by driving improvements in public health while taking account of impacts on moderate drinkers and interference in the market.”

Welsh Heads of Trading Standards (#122)

“...Hywel Dda University Health Board (UHB) welcomes and supports the introduction of a minimum unit price (MUP) for alcohol. There is compelling evidence that introducing a MUP in Wales would reduce alcohol related harms. MUP is strongly evidence based to impact upon the most hazardous and harmful drinkers in our population, and the extensive modelling conducted demonstrates that at 50p per unit significant improvements in health and wellbeing would be achieved.” **Hywel Dda University Health Board (#130)**

“...The Gwent Area Planning Board (APB) agrees with the proposed minimum unit price of 50p to achieve the impact and health gains modelled by the University of Sheffield at this price point. The APB fully supports the legislation as part of a range of initiatives to help reduce the effects of harmful and hazardous drinking.” **Gwent Area Planning Board (#58)**

“...The modelling undertaken by Sheffield University forms the basis of a robust case for setting the minimum unit price of alcohol at 50p per unit. Working through the Regulatory Impact Assessment findings for setting the minimum price, we agree with the conclusion that the 50p per unit level is a proportionate response to tackling the health risks of excessive alcohol consumption. Further, we agree that this level would strike the right balance between the anticipated public health and social benefits and intervention.” **Vale of Glamorgan Shared Regulatory Services (#111)**

“...the University of Sheffield showed that minimum unit pricing provides the biggest health benefits for harmful drinkers in the poorest sections of society. In turn this would contribute substantially to a reduction of health inequalities. As a result Tenovus Cancer Care strongly supports the proposed minimum unit price of 50p and believe this policy will deliver clear benefits, not just in the prevention of certain types of cancer, but also by relieving strains on other sections of the NHS in Wales” **Tenovus Cancer Care (#107)**

Another key theme to emerge was the importance of **consistency and parity with the level of the MUP in Scotland**. This was emphasised in responses from retailers, networks representing retailers and the alcohol industry, Third Sector organisations, as well as by public health stakeholders and health boards, local authorities and APBs.

Support for consistency and parity with Scotland:

“...the rate in Wales should be aligned with the rate set in Scotland. This would prevent unhealthy competition between retailers at both sides of the border. It would also set a clear framework for shopkeepers and consumers.” **National Federation of Retail Newsagents (#118)**

“...The Welsh Government’s proposal to set the minimum unit price at 50p will enable us to confirm and progress the necessary actions speedily. Any other minimum unit price would require to commit time and resources to conducting additional analysis, potentially slowing our implementation...Wales and Scotland may not share a border but there are still benefits to maintaining as much consistency as possible across all nations in the UK where minimum unit pricing is in effect.” **The Co-op (#59)**

“...Alongside tackling alcohol-related harms and health inequalities, this price will help to provide consistency for retailers operating in both Wales and Scotland and targets hazardous and harmful drinkers, rather than those who drink more moderately.” **Royal Society for Public Health (#108)**

“...On balance, the Directors of Public Health Group consider that the estimated impact on health and health inequalities of a 50p minimum unit price is acceptable...In addition, it is appropriate for Wales to operate in line with other parts of the UK.” **Directors of Public Health Group (#135)**

“...the Welsh Government aims to monitor the impact of a 50p MUP policy in Scotland and therefore it would be sensible to set the same price. A different price across the countries of the UK would be particularly damaging and very costly to business.” **WSTA (#43)**

Although supportive of a 50p MUP – responses also highlighted the potential unintended consequences of minimum pricing for alcohol and the need for ongoing monitoring and evaluation. In particular, calls were made for the evaluation plan to be in place before MUP comes into force, setting out the key indicators against which the policy will be assessed (a point also made by those not commenting on the level / not supportive of MUP).

The potential unintended consequences of MUP identified in responses are further highlighted in the section on the principle of minimum pricing.

Supportive of a 50p MUP – but concern expressed over potential unintended consequences and negative impacts...

“A price beyond 50p would risk penalising moderate drinkers still further, and could have other unintended consequences. For instance: A) The greater the price differential between Wales and England, the higher the likelihood of cross border, or even illicit, trade becomes. B) Many retailers have expressed concerns about operating different pricing structures in Wales, Scotland and England. The additional costs of doing so could be passed on to consumers.” **Pernod Ricard UK (#125)**

Support for ongoing monitoring and evaluation to assess possible unintended consequences...

“...The impact of this legislation will need to be closely monitored not only with regard for population health effects but with consideration for the potential increased demand on substance misuse and wider health and care services...Welsh Government should develop a clear monitoring framework to assess the wider impacts of MUP on the population as a whole as well as those most affected by alcohol misuse.” **Hywel Dda University Health Board (#130)**

“...The impact of this legislation will need to be closely monitored not only with regard for population health effects but with consideration for the potential increased demand on substance misuse and wider services.” **Directors of Public Health Group (#135)**

“...Cwm Taf Regional Collaborative Committee broadly supports the minimum unit price of 50 pence per unit. However we would like it to be noted that close monitoring of the impact of this pricing policy on harmful drinkers is necessary to ensure that additional financial hardship is mitigated and appropriate support is in place for these incredibly vulnerable members of our communities.” **Cwm Taf Regional Collaborative Committee (#144)**

Aneurin Bevan Gwent Public Health Team (#109) requested that “transparent monitoring of the impacts of MUP, and good practice from across Wales, is systematically shared”.

“...it is appropriate for Wales to set the same minimum price [as Scotland] but ensure that close monitoring of this impact is undertaken.” **Torfaen CBC (#100)**

“...We believe it is appropriate for Wales to set the same minimum price, but also ensure that close monitoring of this impact is undertaken, both for the population and for the services which may have increased demand put upon them by the introduction of this legislation.” **Cardiff and Vale University Health Board (#113)**

“Although at a population level, MUP will have a positive impact, within Health Board areas we have responsibility to consider the needs of individuals as well as the wider community. Alcohol dependency is a complex issue and often associated with other health problems, particularly mental health issues and difficult life circumstances...We know that MUP will impact disproportionately on our low income harmful and hazardous drinkers, particularly in regard to the most vulnerable groups within our communities...Despite estimated benefits we cannot assume that increasing costs will always reduce levels of alcohol consumption and there needs to be recognition of the danger that some individuals will switch to alternative substances or simply spend a greater proportion of their income, compromising on essential spends such as food. We need to monitor and if needed resource additional capacity with substance misuse and wider support services.” **Directors of Public Health Group (#135)**. Similar points were also made by **Torfaen CBC (#100)**.

“We would like to suggest commissioning a review of the effect of the legislation on people with specific characteristics, e.g. children and young people, families, pregnant women, and also research the relationship between alcohol and domestic violence. The hope is that this would focus the review on the groups most vulnerable to harm. This would all come under ‘The possibility of commissioning other work’.” **Presbyterian Church of Wales (#148)**

Key themes from responses supporting a higher MUP

Amongst the consultation responses supporting a higher MUP, the key issue raised was that the Welsh Government had already consulted on a 50p MUP in 2015 and so the preferred level should now be higher. Some responses also commented on the public health benefits of a higher MUP – and the greater anticipated reduction in alcohol-related deaths and hospital admissions, from an MUP above 50p. A number of responses also commented on needing to take inflation into account, since the Welsh Government consulted on minimum pricing as part of the Public Health White Paper in 2014 and on the draft Public Health (Minimum Price for Alcohol) (Wales) Bill in 2015. It was also suggested that a higher MUP could also have more of an impact on cultural change and reducing consumption amongst children and young people.

Level of the MUP should be higher than 50p

“...The MUP should be greater than 50 pence to take account of inflation since the time of the earlier Sheffield modelling work, the APoSM Report and the subsequent decision of the Welsh Government to introduce MUP. Furthermore, since that time there has been a consistent increase in public concern about excessive alcohol consumption which means that bolder action is required, and will be accepted by the majority of citizens...The main reason is that it seems obvious that the increase in prices due to inflation since the time of the modelling and the subsequent decision to introduce MUP at the 50p level should be reflected in the initial MUP which is set. Further, given that the Act provides for inflation-related increases in future, it seems perverse not to start with an inflation-adjusted price. As the latest Sheffield report says: 'in general, policy effects are larger for higher minimum prices.' (p11). The report explores the effects of different pricing levels and while 'higher MUP levels have an increasing impact on moderate drinkers', 'higher MUP thresholds lead to greater overall reductions in consumption and that the greatest increases in effect with each increase in the threshold occur in the heaviest drinkers' (p37). Surely this is highly desirable positive effect?” **Individual response (#26)**

“...We would like to recommend an MUP for Wales of no less than 60p. The principle of MUP is to contribute to reductions in the consumption of the cheapest, high strength drinks favoured primarily by harmful drinkers. However, setting the MUP at this higher level would strengthen the message that the Welsh Government is determined to prevent alcohol related harms, and to address strenuously their immediate and longer-term impact, whatever people’s current levels of drinking may be...When MUP is implemented in 2019, it will be six years since 50p was first suggested by the Welsh Government. Over that time, inflation has narrowed the range of drinks sold under this unit price, and this will continue following implementation. Setting the MUP at 60p or above will help to maintain this impact over a longer period, prior to the first internal review in 2021.” **Quaker Action on Alcohol and Drugs (#131)**

Key themes from responses supporting a lower MUP

Amongst the consultation responses supporting a lower MUP, the key issue raised was the potential impact of MUP on moderate drinkers and concerns over impacts on retailers, the Welsh economy and tourism. Amongst some responses, calls were made for the level of the MUP to be zero. One response also noted that if MUP was introduced in Wales, then the level should be lower than that specified in Scotland, so as to provide a “different benchmark to consider” (see below).

Level of the MUP should be lower than 50p

“...We believe that for the first two years the actual MUP should be set at zero until such time as there are early indications of the impacts - direct and indirect (unintended consequences) - arising from the Scottish MUP scheme. Current trends are suggesting that consumers are moving away from lower strength products to products with higher %ABVs. Furthermore figures from the recent NHS Health Survey for England shows that the number of people drinking over 14 units a week has fallen since 2011. Also 60% of the population are drinking at low risk levels. This would suggest that targeted help for higher risk drinkers would be most appropriate.” **National Association of Cider Makers (#146)**

Key themes from responses not supportive of MUP

Amongst the responses not supportive of a 50p MUP (or minimum pricing in general), a number of key themes emerged. In particular, concerns were raised over the impacts of a 50p MUP on households living in poverty. In particular, a number of responses highlighted the impacts of introducing an MUP for alcohol on household budgets. Specific concerns were raised that introducing a MUP for alcohol will have unintended consequences for families with children, if parents choose to continue drinking and have to pay more for alcohol, and could therefore less money for food and fuel and potential increases in debt. The concept of being punished for being a moderate drinker was a particularly strong theme to emerge, with a number of respondents commenting on MUP being an example of the “nanny state”. Those not supportive of a 50p MUP questioned the policy rationale and evidence base on using price as a lever to reduce hazardous and harmful drinking and raised particular concerns over whether dependent drinkers would reduce consumption following an increase in the price of alcohol.

There should be no MUP for alcohol

“...Minimum pricing is going to adversely affect the poorest and most vulnerable in society, without having any real effect on alcohol consumption in the majority of the population. The only age group where alcohol consumption particularly risky drinking is increasing, is in the over 50s who in general are less likely to be influenced by price increases.” **Individual response (#77)**

“...Shame on you. Once again the rich are unaffected as their behaviour/habits won't change - they can afford any increase. People like me and my family who work hard, can rarely afford pub prices but like a drink at home are once again marginalised and punished by oppressive government control.” **Individual response (#42)**

The principle of minimum pricing for alcohol

Although the consultation was focussed on the preferred level of the MUP – the majority of responses also commented on the principle of minimum pricing for alcohol. In particular, responses highlighted the potential unintended consequences of introducing a minimum pricing for alcohol and there was strong support for ongoing monitoring and evaluation. Responses specifically highlighted potential impacts and unintended consequences for vulnerable groups, including dependent drinkers, people who are homeless, people living in poverty and low income households; potential impacts on crime – including shop-lifting and the sale of illegal and illicit alcohol; a possible increase in the number of people switching from alcohol to other substances; impacts on cross border shopping; and the potential for negative impacts on retailers and the Welsh economy.

Key themes to emerge from the responses discussing the principle of minimum pricing included:

- **Support for the principle of minimum pricing for alcohol as part of an overall approach to reduce harm:** Responses commented on the role and contribution that MUP can play in helping to reduce alcohol related harm. Children in Wales (#119) commented: Intervening to manage the cost of alcohol in an attempt to better protect individuals, and achieve improved current and future health outcomes for children, young people and their families is an intervention which Children in Wales are very much prepared to support. At the same time there was recognition that minimum pricing must sit alongside other interventions to reduce alcohol-related harm.
- **Increase in demand for services:** A substantial number of responses commented on the potential increase in the number of people seeking support from substance misuse services. Calls made for these services to be properly resourced. One response, for example, noted: "...the impact of the minimum unit price may encourage some people to want to stop drinking and so increase the demand for alcohol cessation services in the short term. The risk if this is not properly funded is that people may try to stop drinking without appropriate support which could result in less chance of success and also additional costs to health and unplanned secondary care emergency admissions. We would like there to be an awareness campaign to commence ahead of the minimum unit price coming in and supported with additional funding for alcohol services for at least a period of 12 months." (Cardiff Third Sector Council #123)
- **Impacts on dependent drinkers:** For a number of respondents, MUP is unlikely to have an impact on dependent drinkers or alcoholics and is unlikely to have an impact on addressing the real issues associated with alcoholism.
- **Potential risk for people to switch to other substances.** A number of responses expressed concern over the potential risk of people switching from alcohol to other

substances as the price of alcohol increase under minimum pricing, particularly when alcohol is used to self-medicate in relation to mental health issues. It was noted that this could in turn increase demands on law enforcement and for other substance misuse services.

- **Impacts on children and families living in poverty:** One of the key criticisms of minimum pricing was the impacts on families living in poverty and its potential disproportionate impacts on household budgets. Linked to this, are the potential impacts for children and young people living in those families if parents continue to consume the same amount of alcohol but at a higher price. Although some responses recognised the greater health gains and the potential for MUP to reduce health inequalities, individual responses tended to focus on how minimum pricing was a “punitive measure” or a “tax on the poor” designed to disadvantage the poorest in society and which disproportionately affects lower income households; has a significant negative impact on the cost of living for low income households; has a disproportionate impact on consumer welfare losses on the poorest; and will reduce family resources available for essentials (such as food, clothing, heating) and non-essentials (including recreation and eating out).
- **Misconception that MUP is a tax:** There was a misconception amongst some responses that the revenue raised from MUP would go to the Welsh Government or the UK Government. Some respondents commented that this additional revenue should be invested into substance misuse services, education and prevention. Calls were also made for more information on where the money raised by minimum pricing would go.
- **Cross border impacts:** Concern was expressed amongst some responses over the impacts of MUP on cross border shopping and the extent to which this would undermine the public health impacts of the legislation and have a negative effect on retailers based in Wales, particularly amongst areas in North East Wales and those with a close border with England. MUP could prompt customers to purchase their alcohol across the border in England which could then directly impact Welsh businesses. Some responses commented that these cross border impacts could be higher than those seen in Scotland.
- **Impacts on retailers:** A number of responses identified specific issues likely to impact on retailers. This included unintended consequences and business considerations. The NFRN (#118) commented that “MUP will create a more levelled playing field for independent retailers. The growing presence of supermarket chains in local areas has led to a decline in the retail sector, as independents have to contend with unachievable price cuts driving them out of business”. However, some members of the NFRN were also concerned that MUP will “drive people away from convenience stores in Wales” particularly given the length of the border between Wales and England and also concerns over how “drop in sales and the inability to sell alcohol at discounted pricing near-date or damaged products could threaten the survival of the smallest businesses.” Concerns were also raised by some members that larger retailers and on-line retailers may find ways to bypass MUP regulations (e.g. NFRN #118). Others commented on the

risk of anti-social behaviour: shoplifting and verbal and physical abuse against retail staff and also the need for sanctions against those selling illicit alcohol.

- **Rationale for introducing an MUP:** Some responses questioned the need and rationale for introducing MUP given that levels of consumption of alcohol are already falling and that there have also been declines in alcohol-related violence and alcohol-related hospital admissions.
- **Alternatives to MUP:** Some responses (particularly retailers and the alcohol industry) suggested alternatives to the introduction of a 50p MUP and included a specific focus on introducing “price bands” for different types of drinks, more in line with minimum pricing introduced in Canada. For example – Molson Coors UK and Ireland (#129) asked the Welsh Government to consider adopting a banded minimum unit price that targets strong alcohol – rather than a flat price applied to all beverages, which they believe is a more targeted policy and will deliver a better policy outcome.

Potential Unintended Consequences

The consultation response from Cymorth (#139) focussed specifically on the potential unintended consequences of introducing an MUP for alcohol and how these need to be “managed carefully”. The Cymorth response notes that wider members of Cymorth have raised concerns about potential rent arrears and evictions as people who are alcohol dependent prioritise money for alcohol over other essentials such as rent; the risk of switching to other substances (with the response highlighting their support for the Welsh Government research commissioned on this issue); concerns over cross border smuggling and exploitation and in particular the risk that county lines activity may easily translate to similar activity concerning alcohol once a minimum unit price is introduced, with the potential for some vulnerable people to be exploited by criminal gangs who deal in cross-border smuggling; the risk of unintended withdrawal and a rise in referrals amongst those who are alcohol dependent; and concerns that certain vulnerable groups will be disproportionately affected by MUP including (but not limited to) people who are homeless, or vulnerably housed, people sleeping rough, people with learning disabilities, survivors of domestic abuse, and more.

Cymorth state the following in their response: “Very real and concerted efforts need to be made to ensure these groups of the most vulnerable on the margins of society, who are structurally disadvantaged and isolated, are not forgotten about, and that the issue that affect them more than other groups are monitored for unforeseen impacts.” **Cymorth (#139)**

Torfaen CBC (#100): Harmful drinkers often have complex needs and therefore they will require additional support to change their behavior; there is a lack of understanding around how low income drinkers experience greater levels of harm; behavior change is

complex, but even more so when addiction is involved; and that there is a risk of increased harm experienced by low income harmful drinkers as a result of MUP. Calls were made for additional resources for local services, which may see an increase in demand following the introduction of an MUP.

Similar points were made by the Aneurin Bevan Gwent Public Health Team (ABGPHT – #109), the Cardiff and Vale Area Planning Board Alcohol Group (#112), the Cardiff and Vale University Health Board (#113) and Hywel Dda University Health Board (#130).

Cardiff Third Sector Council (#123): “Parents may currently be managing to balance their bills and provide food, clothing and heating for their child or children, without anyone being aware of an alcohol dependency. The increase in cost could result in choices having to be made between alcohol and providing basic needs for the children. This could result in a detrimental impact – for example, on the children's academic progress, so not just impacting them now but in the future as well, or result in an increase in neglect safeguarding cases. To ensure the child's rights are honoured there should be additional funding and support for education, in school counselling services, safeguarding and for organisations that work with the whole family to try to holistically address any issues and reduce the impact and ACE's that could result from the legislation...If there are not concurrent steps to reduce excessive consumption of alcohol and other harmful substances, this increases the risk that people will switch from alcohol to other substances which may be cheaper but are readily available, such as Synthetic cannabinoids, mda and opiates, or decide that it is more economical to make their own, which is unregulated and which is of unknown strength and the risks to health that could come with it. This could increase the demand on law enforcement and for other substance misuse services.”

Plans for Implementation

Although the consultation concerned the level of the MUP to be specified in regulations, a number of stakeholders also commented issues relating to implementation – with specific suggestions made around communications, guidance and work to be undertaken to prepare for implementation. Calls were made for the Welsh Government to share information on when the draft regulations would come into force as early as possible. As the WSTA (#43) commented: “It would be helpful for the industry and many of our members if we could be notified as soon as practical as to when these regulations will come into force. This will allow our members time to prepare for any changes they need to make.”

A number of responses commented on the lead in time for MUP and the importance of allowing sufficient time for those affected by the legislation to prepare for implementation. Calls were made for a longer lead in period (between when the regulations specifying the level of the MUP are passed and when MUP comes into force) than that provided in

Scotland. Several responses also commented on plans for the enforcement of the legislation and the need for inspection and enforcement activity to be appropriately resourced.

Resources to support implementation – enforcement and inspection

“...As enforcement of the legislation is to be the responsibility of local authorities, such as ourselves, TCBC would strongly encourage Welsh Government to ensure that each local authority has the capacity and resources to undertake this duty and that this foresighted legislation does not become an additional burden.” **Torfaen County Borough Council (#100)**. See also: **Aneurin Bevan Gwent Public Health Team (#109)**.

“...We welcome the introduction of minimum pricing to address the impacts of excessive levels of alcohol consumption on health, services, crime and disorder. We note that some funding has been made available to support the Enforcement Officers based in the Local Authorities to enable them to check compliance by shop owners. We are concerned that the amount of funding is too low and does not include provision for additional funding for other services which may be impacted especially in the short term.” **Cardiff Third Sector Council (#123)**

Time to prepare for implementation

Pernod Ricard UK (#125): “The Scottish Government’s preferred price level was announced on 1st March 2018, and enshrined into law on 25th April, for implementation on 1st May. This condensed timescale posed a challenge for many retailers. For instance, anecdotally, we heard of some having to discount price-marked stock, to ensure it was cleared from their shelves ahead of 1st May. A longer implementation period in Wales would therefore be welcomed by the industry.”

Association of Convenience Stores (#126): “The introduction of minimum unit pricing will have implications not just on changes to pricing systems but also staff training, amendments to existing promotions, and the use of vouchers. Delivering these changes will have different effects on different retailers depending on their business models. For multiple retailers, with central administration systems, changes to pricing and promotions will be easier as they already have structure in place to deliver this. However, they will still incur costs to deliver price changes and alcohol range decisions will have to be made quickly. Equally, independent convenience stores will have to invest in additional staff and administrative time to deliver pricing changes and ensure compliance, which is recognised in the Regulatory Impact Statement. Therefore, we welcome that the Welsh Government is already engaging with retailers on the introduction of minimum unit pricing in Wales and encourage the Welsh Government to take into consideration the experience of the

implementation of minimum unit pricing in Scotland to ensure a smooth transitional period for retailers in Wales.”

The **Association of Convenience Stores (#126)** also commented: “We welcome that the Welsh Government are already consulting on the level of the minimum unit price in Wales and engaging with retailers ahead of the introduction of minimum unit pricing in Summer 2019. This will ensure that retailers have enough time to prepare their businesses ahead of the regulations coming into effect. For the implementation of minimum unit pricing in Scotland, retailers had less than four months from when the minimum unit price level was confirmed to its introduction. Such a short timeframe meant that it was challenging for retailers to prepare for the regulations.”

Reviewing the level of the MUP

Although the consultation was focussed specifically on the level of the MUP to be specified in the regulations, responses also commented on plans for monitoring outcomes and reviewing the level. For some, while there was support for a 50p MUP, it was suggested that the level should be reviewed on an ongoing basis to ensure it was delivering anticipated health benefits. A number of responses from the NHS, public health stakeholders, APBs and public sector organisations specifically commented that the MUP should be regularly reviewed and should rise in line with inflation. Some responses suggested that the level of the MUP should be reviewed on annual basis and should rise in line with inflation, to ensure it remains effective over time. Other responses welcomed the internal review planned by Welsh Government after two years of implementation, while some commented on the need for review after three years. By contrast, a number of responses from retailers and the alcohol industry called for the level of the MUP to remain at 50p for five years.

A number of responses also commented on how Scottish Government and Welsh Government plans for reviewing the level of the MUP and associated timings are not currently aligned, which could cause issues.

Reviewing the level of the MUP

“...It should be acknowledged, then, that whilst MUP must be set at a level that is proportionate, the probable effectiveness of a 50p MUP will have declined since 2013, and likely declined further still by the time of the evaluation of the measure 5 years post-implementation. Whatever threshold is decided upon by the Welsh Government, this evaluation (and any interim reviews) must include an assessment about the impact of inflation on the effectiveness of the measure.” **Alcohol Change UK (#91)**

“...it is important that there is a mechanism put in place to review the level of MUP regularly and ensure that it rises with inflation so that it remains effective.” **Royal Society**

for Public Health (#108)

“...It will be important to review the position at regular points to ensure the price is current and reflective of the market when taking into account inflation etc., as well as the outcomes outlined within the proposal are having the benefits that the regulations set out to achieve.” **Powys APB (#137)**

“...Due to inflation, the Welsh Government must review the MUP limit on a frequent basis with a view to increase it if necessary. It is vital that the Welsh Government co-ordinates its MUP limit with other governments in the UK to limit potential cross-border issues and confusion for consumers.” **Cancer Research UK (#132)**

“...The group believe that 50p per unit is a reasonable minimum price to set, due to the evidence base which demonstrates the substantial impact on hazardous and harmful drinking that it is likely to have at this level. However, we would recommend that the model implemented in Scotland is carefully monitored prior to implementation to see the impact it is having before a final decision is made. We would also like to see the price reviewed regularly to ensure it is still appropriate.” **Cardiff and Vale Area Planning Board Alcohol Group (#112)**

“...SRS welcomes the commitment given by Welsh Government to carry out an internal review of the minimum unit price two years after the legislation comes into force.” **Shared Regulatory Services in the Vale of Glamorgan (#111)**

“...The Sheffield study predicts that health benefits increase with price and, it may be desirable to raise the minimum unit price in future to gain greater health benefits. However, it is prudent to establish the principle of a minimum unit price first and to examine the impacts of the minimum unit price set at a moderate 50p to avoid any extreme unexpected consequences. WHOTS, therefore, welcomes Welsh Government’s decision to review the level of the minimum unit price after 2 years and, at the end of a five-year period, to lay before the National Assembly and publish a report on the operation and effect of the Act during that period. This will ensure that the consequences of the minimum unit price are fully understood before it is continued or increased.” **Welsh Heads of Trading Standards (#122)**

“...We support the commitment for the Welsh Government to undertake a review after the first two years to examine the impact the legislation has had in achieving its desired aims. This review should also take into account future developments in respect of knowledge and understanding; expert advice and external publications on this matter.” **Children in Wales (#119)**

“...We accept that the proposed 50p level is appropriate for now; however, we believe that the level of MUP needs to be regularly re-evaluated and procedures put in place to uprate it and ensure it will remain effective over time...Inflation and income growth mean that the impact of MUP at 50p will decline over time, and, indeed, already has declined

since the Welsh Government first stated their support for a MUP at 50p in 2013...In many countries, the effectiveness of alcohol tax in reducing harm has been undermined because they have failed to keep up with inflation and income growth – it is imperative that the same does not happen to MUP in Wales. Therefore, the Welsh Government should put procedures in place to ensure the level of MUP is regularly reviewed and adjusted to ensure it stays effective." **Alcohol Health Alliance UK (#138)**

"...ABGPHT recommend that this level is regularly reviewed – every 3 years, at a minimum. ABGPHT recommend that the level is re-examined after considering inflationary rises, the impact of the introduction of MUP and any emerging evidence from across the UK." **Aneurin Bevan Gwent Public Health Team (#109)**

"...it is prudent to establish the principle of a minimum unit price first and to examine the impacts of the minimum unit price set at a moderate 50p to avoid any extreme unexpected consequences. Ceredigion County Council, therefore, welcomes Welsh Government's decision to review the level of the minimum unit price after 2 years and, at the end of a five-year period, to lay before the National Assembly and publish a report on the operation and effect of the Act during that period. This will ensure that the consequences of the minimum unit price are fully understood before it is continued or increased." **Ceredigion County Council (#141)**

"...The price set should remain fixed throughout the five-year period to allow a meaningful evaluation of the impacts." **The British Beer and Pub Association (#121)**

"...The agreed minimum unit pricing mechanism in Wales should not be increased throughout the five-year period to allow a meaningful evaluation of the impacts and unintended consequences. At the end of a five-year period the stated published report on the 'operation and effect of the Act during that period' should include a full and independent evaluation of Minimum Unit Pricing in Wales." **Molson Coors UK and Ireland (#129)**

Question 3:

We would like to know your views on the effects that this proposal would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

Over 40 responses to the consultation provided no response to this consultation question. In addition, over 40 responses stated that MUP would have no effect or impact on the Welsh language. In particular, 30 responses who answered this consultation question queried how MUP would affect the Welsh Language and / or questioned the relevance of

this question to the consultation. However, a smaller number of responses stated that while they had no specific views on the effects of the proposal upon the Welsh language, they welcomed its consideration. A small number of responses stated that the impact of MUP would be neutral.

Other responses identified potential effects of MUP on the Welsh language. For example, a small number of respondents highlighted potential negative impacts for rural pubs in Welsh speaking areas. Specific observations also were made in relation to MUP and a wider Welsh culture and protecting the health of the nation. A small number of responses also noted that MUP may have a positive impact on the Welsh Language if more people start going to the pub (for example – in response to the price of alcohol increasing in supermarkets). One response noted that availability of cheap alcohol in supermarkets is encouraging people to drink at home, as opposed to drinking in the pub. The introduction of an MUP could mean more people go to the pub, which could in turn have a positive impact on the Welsh Language.

More generally – responses recognised the importance of bilingual communications and supporting materials on MUP, as well as bilingual guidance for retailers and local authorities.

Effects of MUP on the Welsh Language

“...We have not identified any negative impact this policy will have on the Welsh Language, both in terms of opportunities for people to use the Welsh language or on treating the Welsh language less favourably than English. Communicating the legislative changes will require compliance with existing legislation, and expectations should be placed on businesses and private sector provider services operating in Wales to have due regard to the requirements for information to be available in the Welsh Language.”

Children in Wales (#119)

“...There will be no little impact to the Welsh language, but there might be negative attitudes towards the Welsh Government and Wales in general. Conversely, the effect may be a positive one.” **Individual response (#86)**

“...Culturally, I see this presenting a responsible aspect to Wales' public health policies. Decades ago Wales was a place where "you couldn't get a drink on a Sunday". Though not universally welcomed, this stance set Wales apart as a nation that sought to protect the health, wellbeing and social cohesion of its population. I believe the introduction of minimum pricing will again define this ambition.” **CAIS (#12)**

“Rural areas speak Welsh. Making it more expensive for people to drink will make Welsh speaking people move away. Which results in the local economy becoming worse!” **Individual response (#50)**

Support for bi-lingual materials and communications

“...Future awareness-raising work needed to be undertaken around the MUP policy in Wales, both in terms of the practicalities of its implementation and its overall purpose, and must meet the needs of both English and Welsh speakers... It will be important that retailers and consumers are made aware of the introduction of MUP and why the price of certain drinks will increase.” **Alcohol Change UK (#91)**

Question 4:

Please also explain how you believe the proposed policy could be formulated or changed so as to have:

- i) positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language; and**
- ii) no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.**

Over 65 responses provided no response to this consultation question. As with Question 3, some respondents queried the relevance of this question to a consultation on minimum unit pricing. A small number of responses stated that they had no specific views on how the policy could be changed to increase the positive effects on opportunities for people to use the Welsh language. Others highlighted similar points to those raised in relation to question 3, with a specific focus on the importance of bilingual communications and supporting materials and a Welsh language slogan representing the policy. As one respondent stated: “It is essential that we developed a vocabulary around minimum pricing which is accessible in the Welsh Language” (CAIS – #12).

Question 5:

We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

Over 70 responses did not include a specific response to this consultation question. Of those that did comment, the majority of the information provided related to the principle of minimum unit pricing and specific concerns or issues regarding the introduction of a minimum price for alcohol (which have been highlighted in the previous sections). To summarise, those responding to question 5 raised the potential impacts of MUP on low income households / drug use and switching / dependent drinkers and questions were

raised around whether MUP will actually work. Other commented on the potential increase in demand for substance misuse service and the importance of funding treatment services alongside MUP. Comments were also made in relation to the increases in revenue for retailers (as well as the misconception that MUP is a tax). Specific concerns were expressed that responsible drinkers would be affected by MUP; that other types of intervention were needed to address hazardous and harmful drinking; and calls were made for a wider public health campaign around the impacts of excessive alcohol consumption. A number of responses identified that MUP would adversely affect retailers and issues were also raised in relation to cross-border sales.

One of the key themes to emerge from the responses to consultation question 5 related to guidance on MUP. A number of responses made specific comments in relation to Welsh Government guidance and communications. For those supportive of MUP, comments were also made in relation to needing time to prepare for implementation and the importance of reviewing the level, as highlighted earlier in this document.

Guidance and Communications on MUP

Specific issues were raised in relation to guidance and support for Local Authorities. As **Monmouthshire Public Protection Department (#55)** stated: “In the RIA the success of enforcement of minimum pricing is compared to that of carrier bag legislation being very low. Carrier bags legislation has been relatively self-regulating and this may not be case for minimum pricing as it is not so obvious to the public. We ask that the proposed guidance is clear on expectation of enforcement actions by local authorities. The RIA states that the minimum pricing will apply to qualifying premises in Wales which operate an online or telephone delivery of alcohol when supplying to a person in Wales. Minimum pricing will not be in effect in England and we believe, as a bordering authority, there may be issues with cross border sales and movement of cheaper alcohol particularly once the bridge tolls are removed.”

Caerphilly CBC (#124) commented: “Effective communication and guidance for retailers of alcohol are key to ensuring compliance with the proposed legislation. Publicity in advance, guidance in an easy to understand format, required languages with examples particularly for the smaller independent retailers.”

The **Association of Convenience Stores (#126)** commented: “We would also welcome clarity on how minimum unit pricing will affect alcohol sold in linked promotions such as wine in a dinner meal deal, and whether minimum unit pricing will affect the use of money-off vouchers for purchases with alcohol. For example, if a customer had a £5 off voucher for their shop and used it for a purchase which includes alcohol? Or would the retailer need to ensure that the total sale amount did not fall below the minimum unit price? We hope that this is addressed in the Welsh Government’s guidance. The Welsh Government should also consider the guidance issued on linked promotions in the Scottish Government’s guidance to ensure that it is consistent.”

Calls also made for consumer focussed campaigns on MUP: “ACS believes it is vital that

the Welsh Government develops and implements a consumer-focused campaign to explain the implications of minimum unit pricing to customers and help them to better understand why alcohol prices will be affected. Any frustration resulting from a lack of customer awareness will inevitably be directed at shop staff – the Welsh Government should ensure that police forces in Wales are fully aware of the implementation timeframe to enable them to proactively support staff in the event of any minimum unit pricing-related incidents.” **Association of Convenience Stores (#126)**

Engagement events and meetings

During the 12 week consultation, a number of meetings and engagement events took place with a range of different stakeholders – see Table 1 below.

Table 1: Summary of engagement events and meetings

Event / Meeting	Date	Summary of views on the proposed level of the 50p minimum unit price
Retail of Alcohol Standards Group, Wine and Spirit Trade Association (WSTA): Attended by representatives from the WSTA, Community Alcohol Partnerships, Asda, Morrisons, Waitrose, Sainsbury's, Lidl, Home Bargains, Aldi and the Association of Convenience Stores.	10/10/18	Important to have consistency with the level of the MUP in Scotland.
Regional Leads Meeting: Area Planning Boards	16/10/18	Difficult to identify what the level of the MUP should be when the legislation has not yet been implemented. APBs to respond to the consultation individually.
Alcohol Change UK	18/10/18	Supportive of the principle of MUP.
British Beer and Pub Association and	18/10/18	BBPA: Written response received.

Camra		
National Meeting of the Directors of Public Protection in Wales	19/10/18	Directors encouraged to respond to the consultation.
National Federation of Retailer Newsagents	06/11/18	Members encouraged to respond to the consultation. Written response received.
Public Health Wales Annual Conference	08/11/18 and 09/11/18	Engaged with over 120 attendees to encourage organisations and individuals to respond to the consultation. Broad support for minimum unit pricing, but concerns raised regarding the impacts of introducing an MUP on those living in poverty and the “profit” from MUP going to retailers.
Substance Misuse Partnership Board	21/11/18	Members encouraged to respond to the consultation.
Children in Wales	22/11/18	Supportive of a 50p MUP.
Office of the Children’s Commissioner	28/11/18	Supportive of the principle of MUP.
Public Health Wales Alcohol Leads Meeting	27/11/18	Supportive of the principle of MUP. Health Boards have responded on an individual basis.
Welsh Heads of Trading Standards	30/11/18	Supportive of a 50p MUP. Written response received.
Third Sector Substance Misuse Network	05/12/18	Members encouraged to respond to the consultation.
Welsh Government Alcohol Industry Network	05/12/18	Members encouraged to respond to the consultation.
Welsh Heads of Trading Standards National Conference	11/12/12	Supportive of a 50p MUP. But concerns raised over potential impacts on the sale of illicit alcohol, bootlegging and cross-border sales.

AREA PLANNING BOARDS:		
Cwm Taf Area Planning Board	08/11/18	Supportive of a 50p MUP. Written response received.
Dyfed Area Planning Board	04/12/18	Supportive of the principle of MUP – but issues raised e.g. cross border shopping / impacts on dependent drinkers / impacts on households in poverty.
Cardiff and Vale Area Planning Board	05/12/18	Supportive of a 50p MUP. Written response received.
Gwent Area Planning Board	12/12/18	Supportive of a 50p MUP. Written response received.
Western Bay Area Planning Board	13/12/18	Supportive of the principle of MUP – but issues raised e.g. cross border shopping / impacts on dependent drinkers / impacts on households in poverty / potential impacts on services.
Powys Area Planning Board	12/12/18	Supportive of a 50p MUP. Written response received.
North Wales Area Planning Board	14/12/18	Supportive of the principle of MUP – but issues raised e.g. cross border shopping / impacts on dependent drinkers / impacts on households in poverty (particularly in light of the roll out of universal credit). Written response received.
Service Users		
Cardiff and Vale Service User Forum	16/11/18	Concerns raised over impacts on dependent drinkers, families living in poverty, the risks of switching (from alcohol to other substances) and the potential increase in the number of people seeking support from substance misuse services.
RCT and Merthyr User Forum	12/12/18	The majority of members of were not supportive of MUP. Concerns raised over impacts on dependent drinkers, families living in poverty, risks of switching and the potential increase in the number of people seeking support from substance misuse services. Calls made for greater investment into treatment support services and harm reduction.

Gwent User Forum	13/12/18	Some members were supportive of MUP but on the whole, were not supportive. Concerns raised over the risk of switching from alcohol to other substances and the potential for an increase in people accessing services. Calls made for more to be done in terms of alcohol labelling, in a similar way to cigarettes.
Workshops with young people		
Workshop with Young Wales, North Wales.	November	Key points from the discussions were submitted to the Welsh Government as part of the consultation. They included: Support for a 50p MUP as it will help lower health costs and potentially stop people from drinking. Recognition that MUP is more likely to affect the off-trade, rather than the on-trade.
Workshop with Young Wales, South Wales.	December	Key points from the discussions were submitted to the Welsh Government as part of the consultation. They included: Limited support for the introduction of an MUP for alcohol. The need for alternative actions and policies, including a focus on education, better support for people who are drinking and looking at the issue of availability.

Summary of the issues raised most frequently during meets and events with stakeholders:

- Important to ensure there is consistency with the level of the minimum unit price being implemented in Scotland.
- Important to learn lessons from the implementation of MUP in Scotland.
- Concerns raised regarding the potential impacts of MUP on those living in poverty and impacts on household budgets.

- Concerns raised in relation to the risk of switching from alcohol to other products and the potential for an increase in the sale of illicit alcohol.
- Concerns raised regarding impacts on dependent drinkers and how MUP would not make a difference and would not reduce consumption amongst those dependent on alcohol. MUP seen as a punitive measure designed to hit those most vulnerable the hardest.
- Concerns raised regarding the potential for an increase in the sale of illegal / illicit alcohol.
- Comments made in relation to cross border sales and how people would just travel to England to buy alcohol and how this could undermine the public health aims of the legislation.
- MUP needs to form part of a wider approach to addressing substance misuse and reducing alcohol related harm. There are other levers which could be used, including tackling availability, better labelling, prevention and early intervention, and better education and support for young people.
- Potential for an increase in the number of people seeking support following the introduction of an MUP. Substance misuse services need to be resourced to cope with this potential increase in demand.

Next steps statement

The Welsh Government remains of the view that the level of the MUP to be specified in regulations, for the purposes of the Public Health (Minimum Price for Alcohol) (Wales) Act 2018, should be 50p. The Welsh Government intends to lay regulations before the National Assembly for Wales later in 2019, specifying this level, for its consideration. Plans for implementation will continue.

Ahead of implementation, the Welsh Government will continue to work with retailers and other stakeholders – to finalise guidance, supporting documentation and communications to help people prepare. We will also continue to work closely with local authorities and the Welsh Heads of Trading Standards on plans for inspection and enforcement of the legislation. As highlighted in the Regulatory Impact Assessment for the draft regulations, a budget of £300k has been allocated for these purposes over three years.

We will also implement plans to evaluate the legislation, which is currently being commissioned. As highlighted in the Regulatory Impact Assessment for the draft regulations, a budget of £350k has been allocated for this purpose over five years.

We also recognise the importance of continuing to share and publicise the public health aims of the legislation – and intend to develop further communications on the policy rationale underpinning MUP and its aims to reduce hazardous and harmful drinking. As highlighted in the Regulatory Impact Assessment for the draft regulations, a budget of £100k has been allocated for this purpose.

Many responses to the consultation commented on the principle of minimum pricing and also raised concerns and issues regarding the potential unintended consequences of introducing a minimum unit price for alcohol, which we have noted. These concerns focused specifically on potential impacts on vulnerable groups, household budgets, the risk of switching and the potential increase in the number of people seeking support for services. We will continue to consider these potential issues – and have commissioned research to look at the risk of switching, which will report ahead of implementation. Furthermore, in December 2018, an extra £2.4million in funding was announced for 2019/20 for the seven Area Planning Boards who are responsible for commissioning local front line services.

Welsh Government has always said that minimum pricing forms part of a wider strategy and approach to reducing substance misuse. We will continue to use all available levers to reduce the harms caused by the excessive consumption of alcohol, as we develop and take forward a new Delivery Plan for Substance Misuse.