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# 24-month Review of the Introduction of Minimum Pricing for Alcohol in Wales

#### **Executive Summary**

# 1. Research aims and methodology

- 1.1 This report provides an interim analysis of the journey since the Welsh Government introduced a minimum price for alcohol (MPA). It is a synthesis document that offers an overall evaluation, of the implementation, early (24 month) impact and initial considerations of the introduction of MPA into Wales. It utilises a contribution analysis methodology.
- 1.2 In doing so this report has brought together a range of secondary and primary data material. This includes the interim reports from other Welsh evaluations of MPA, some additional new primary interview data and material from evaluations and reflections on the implementation of pricing policies in other jurisdictions, notably Scotland.
- 1.3 The overall aims of the Contribution Analysis study are: to assess the contribution (if any) that the introduction of MPA in Wales has made to any (measurable and observable) changes in alcohol related behavioural, consumption and retail outcomes. In doing so attention was paid to the following objectives:
  - Refining and evaluating contribution against a Theory of Change.
  - Providing a synthesis evaluation of other specific Welsh evaluations of MPA.
  - Analysing wider literature, other Welsh data sets and jurisdictional evaluations (notably Scotland)
  - Undertaking additional specific primary data collection to account for other possible contributions and explanations
- 1.4 It should be noted that as an overall synthesis report it collates messages across the whole population, and as such explores considerations for general population, moderate, hazardous, harmful, treatment seeking and dependent drinkers. In order to maintain a manageable volume and readability, it has deliberately not (overly) repeated detail that is elsewhere, concentrating instead on the key learning whilst signposting to the existing evidence trail.

# 2. Background and context

- 2.1 Minimum pricing for alcohol has become an increasingly established policy response across the globe. It sits within a diversity of policy frameworks that seek to regulate a legal market and address the known harms caused by excessive alcohol use. Managing alcohol affordability, is considered to be one of the key effective elements of a successful alcohol policy.
- 2.2 The Welsh Government MPA legislation focuses on such issues of affordability.

- 2.3 The background for the Welsh Government's introduction of a minimum pricing for alcohol (MPA) policy has been set out in detail in a number of previous reports<sup>1</sup>. The introduction of an MPA policy in Wales was subject to three stages of consultation in 2014, 2015 and 2018.
- 2.4 The Public Health (Minimum Price for Alcohol) (Wales) Bill was passed through the National Assembly in Wales in June 2018 and received Royal Assent, becoming an Act, on 9<sup>th</sup> August 2018. It set a minimum price for alcohol based on a unit of alcohol per 50ppu price. The legislation took effect on March 2<sup>nd</sup> 2020.
- 2.5 In setting a price of 50ppu the Welsh Government explicitly set out its policy to 'target alcohol consumption among hazardous and harmful drinkers, with the aim of delivering greater health benefits to those most at risk, while taking account of impacts on moderate drinkers and interference in the market'. In deciding on the 50ppu level, the Welsh Government were also mindful of the long running arguments and concluding considerations of the Scottish Government's legal battle to establish the legitimacy of its (50ppu) MUP policy.

# 3. Key findings

- 3.1 The report provides a comprehensive narrative of the introduction of MPA in Wales.
- 3.2 In doing so it provides a detailed summary of existing literature. It identifies the theory of change adopted by the Welsh Government for its' policy implementation. In outlining the detail of the contribution analysis methodology it also highlights an adaptation of this theory of change used by the evaluation team. The essential premise remains one that an increase in price leads to a reduction in purchasing and therefore consumption, which in turn leads to reduce harms.
- 3.3 The report provides; a synthesis of other evaluations of MPA in Wales to date, consideration of other relevant Welsh data sets, discussion of other possible factors influencing alcohol affordability and consumption and a summary of the evaluations for Scotland published to date. In drawing together these experiences and views it identifies six headline messages.

## **Key Message 1: Successful policy implementation**

- 3.4 There has been a very good level of compliance with the policy. Retailers report being well informed and comfortable in their implementation. Trading Standards Wales reported only six fines issued in response to 3,000 plus inspections, and price checks through a number of evaluations show minimum prices being consistently adopted. Although some of the respondents in the two research projects involving feedback from drinkers indicated the existence of some non-compliance, the overall picture would indicate this as the exception rather than the norm.
- 3.5 There have been clear observable price changes on specific products. Product checks and direct reporting indicate certain products have acquired new post 50ppu price points and some products as a consequence have disappeared or are rare to purchase. There has been some industry product reformulation, i.e. reduced aby or product size to increase product affordability.
- 3.6 The Welsh Government seized the opportunity before the Wales Act 2017 to implement the policy. This is in alignment with other non-English UK governments, other worldwide governments, and the World Health Organisation and as such should be applauded for this decision.

#### Key Message 2: Observable impacts thus far

3.7 Product changes/availability. More specifically the introduction of the policy raised the price of a number of previously especially cheap alcohol products, notably cider.

<sup>&</sup>lt;sup>1</sup> Research into the potential for substance switching following the introduction of minimum pricing for alcohol in Wales (gov.wales); Assessing the Impact of Minimum Pricing for Alcohol on the Wider Population of Drinkers - Baseline (gov.wales)

- 3.8 Impact on consumption. For most no obvious impact, either not drinking at sufficient volume or product not affected at the 50ppu level.
- 3.9 For those often dependent drinkers looking to maintain affordability has predominantly been done by adapting pre-existing coping/purchasing/affordability behaviours, notably going without food, or not paying bills.
- 3.10 Some negative crime/health matters (most specific in small element of overall population, notably those who 'need' alcohol)
- 3.11 This is combined with a range of concern about availability of and impact on treatment services and addressing wider social and health inequalities.

#### Key message 3: General agreeability with the policy

- 3.12 The policy has been broadly welcomed. This is highlighted in many of the evaluations and reports and includes a positive response within all groups, e.g. drinkers, enforcement agencies, providers, and retailers. This is most often accompanied with agreed concern about the availability of cheap alcohol and protecting future generations.
- 3.13 Despite this there has been some opposition to the policy (notably among some providers and drinkers) and consistent pre- and post-MPA implementation concern expressed about the impact on those heavy drinkers with low incomes.

#### **Key Message 4: Strong resonance with Scottish evaluations**

3.14 The Welsh evaluation has some (positive) consistent echoing of messages resonant with Scottish evaluation outcomes. This should provide confidence in Welsh evaluations and any likely impacts of MPA.

## Key message 5: A cautious price

- 3.15 The relatively limited effects, both positive and negative, reflect the 50ppu price level and it being an initially cautious one. While it was the price level deliberately chosen for implementation, given it is based on an economic environment that has rapidly changed, many have been arguing that it now needs to be updated.
- 3.16 Any potential effect of the minimum price is eroded over time by factors such as inflation or rising cost of living.
- 3.17 The current socio-economic climate is a difficult one in which to raise the minimum price or a perceived additional living cost.

#### Key Message 6: MPA in Wales occupies a messy policy delivery and evaluation space

- 3.18 The specific nature of the devolution boundaries, define the extent to which the Welsh government can influence relevant socio-economic policy, and it also has less influence over other elements of overall alcohol policy i.e. advertising and licensing, as opposed to say Scotland.
- 3.19 MPA needs to be seen in the context of the elements of effective alcohol policy, notably effective treatment provision.
- 3.20 There are a multiplicity of possible contributing accounts for data outcomes and any observable impact of MPA.
- 3.21 It is clear that in particular COVID-19, and the emerging 'Cost of Living' crisis have become huge distracting influences

# 4. Early Considerations (recommendations)

- 4.1 Given this is an interim evaluation rather than a completed review, this report provides the following key considerations, rather than conclusive recommendations, for the Welsh Government to potentially act on
- 4.2 Maintain and support the current commitment to evaluation and monitoring of the MPA policy.
- 4.3 Actively consider a review of the current 50ppu price level. It seems likely that a price increase is required to maintain any of the impact of MPA observed so far. Any price increase will require well-crafted communication and implementation in the current economic context.
- 4.4 Continue to engage with Public Health Scotland, monitor its final outcome report. Continue to compare Scotlish findings with those of Wales. This comparative, when consistent, enables confidence in the Welsh evaluation suite.
- 4.5 Where necessary consider what other evaluations may be required, for example the impact of MPA on children, young people and families.
- 4.6 Reinforce communications about whom the policy is targeting. This may include the need for a relaunch of messaging about the policy. The Welsh Government has a number of other strategic responses for supporting the population of harmful drinkers who need treatment and related support. The messages about this need to be better understood and by consequence the messages about whom the intended Welsh target for MPA is too.
- 4.7 Given the expressed concern for and impact on dependent drinkers with low incomes of the MPA policy, it seems imperative that Welsh Government ensure delivery, resourcing and support of an effective treatment system, consistent with other policies/strategies, i.e. The Substance Misuse Delivery Plan.
- 4.8 Where possible, continue to mitigate on matters of poverty and social injustice, as it is increasingly clear that MPA impacts most heavily on those heavy drinkers with lower levels of income and experiencing poverty. In this regard, also consider how the next 'Substance Misuse' delivery plan does more to integrate the intersections of support for food, housing, income and other social security considerations, within those of direct treatment services. (Noting inequality and subsequent deprivation is such a critical factor in health outcomes).
- 4.9 We also offer the following recommendations for service/treatment providers: (a) better promote the policy of MPA and offer clear signposting to support services for help with budgeting, housing, food banks, relationship advice, counselling, referral into detox, and (b) be clear in offering explicit harm reduction advice re the potential harms of switching from one alcohol product to another and or to spirits or other substances.

Full Research Report: Report: Livingston, Madoc-Jones, Holloway, Perkins, Buhociu and Murray (2023). 24-month Review of the introduction of Minimum Pricing for Alcohol in Wales. Cardiff: Welsh Government, GSR report number 65/2023

Available at: <a href="https://www.gov.wales/minimum-pricing-alcohol-contribution-analysis">https://www.gov.wales/minimum-pricing-alcohol-contribution-analysis</a>

Views expressed in this report are those of the researchers and not necessarily those of the Welsh Government

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

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