

Alcohol Promotion Consultation Questionnaire

This consultation seeks views on proposals to address harmful drinking by making changes to licensing legislation to prohibit or restrict irresponsible alcohol promotions.

The Department is keen to hear from everyone who will be affected by the changes, including consumers of alcohol, trade associations, criminal justice workers or those who run or work in pubs, clubs, supermarkets or other outlets selling alcohol.

This consultation runs for eight weeks from 11 October to 6 December 2010.

While we cannot accept responses by telephone, general enquiry calls may be made on 028 9082 9521.

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Q1. Which of the following do you believe are 'irresponsible promotion of alcohol (please tick yes or no for each)

	YES this IS irresponsible promotion of alcohol	NO this is NOT irresponsible promotion of alcohol
providing an alcoholic drink free or cut-price on purchase of one or more drinks (whether alcoholic or not);	✓	<input type="checkbox"/>
providing an alcohol drink(s) free or cut-price on purchase of that particular drink – two for one;	✓	<input type="checkbox"/>
providing an unlimited supply of alcohol for a fixed charge (including any entrance fee) e.g. “all you can drink for £10”, “pay your entry fee then drink for free until 10pm”;	✓	<input type="checkbox"/>
encouraging a person to buy or drink a larger measure of alcohol than they would otherwise have intended;	✓	<input type="checkbox"/>
encouraging specific groups to drink for free or at a discount e.g. “women drink for free”, “half price drinks for under 25s”, discount nights for students or cheap drinks for fans of a specific sporting team;	✓	<input type="checkbox"/>
relating to an alcoholic drink which is likely to appeal largely to under 18s;	Unclear	<input type="checkbox"/>
basing a promotion on the strength of any alcohol;	<input type="checkbox"/>	✓
rewarding or encouraging drinking alcohol quickly, that is, drinking games;	✓	<input type="checkbox"/>
offering alcohol as a reward or prize - unless the alcohol is in a sealed container and consumed off the premises;	✓	<input type="checkbox"/>
the supply of alcohol on licensed premises at a reduced price during a limited period on any day (“happy hours”); and	✓	<input type="checkbox"/>
providing two or more alcoholic products in a package at a reduced price.	✓	<input type="checkbox"/>
dispensing alcohol directly by one person into the mouth	Unclear	<input type="checkbox"/>

of another (other than where that other person is unable to drink without assistance by reason of disability);

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Q1a: Are there any other activities you would consider as being "irresponsible promotion of alcohol"? if yes please state these below:

Sponsorship is a form of alcohol promotion not addressed within the consultation. The sponsorship of youth events and/or groups by alcohol companies including music festivals, sports events, student groups, sports teams etc, most particularly those groups whose members are under 18.

Providing vouchers for free alcohol in the post or on websites.

Online promotion of alcohol on social networking sites etc.

The use of loyalty cards and bonus points from the purchase of alcohol towards acquiring another product or service. Similarly the use of loyalty cards or bonus points arising from the purchase of products or services that can be used towards the purchase of alcohol.

Providing free alcohol- branded merchandise (t-shirts, headgear, electronic equipment) with the consumption of a certain amount of alcohol.

Supermarket and off-licence promotions selling alcohol at below cost prices.

Q2. The Department for Social Development is considering introducing new powers which will allow the control of alcohol promotions which may encourage excessive alcohol consumption.

Would you agree with such regulation?

Yes

Please comment further:

IPH welcomes the commitment to develop legislation to discourage excessive alcohol consumption and thereby tackle the substantial health and social harms caused by our current pattern of alcohol consumption.

In particular we welcome that the Minister for Social Development and his Department has grasped the opportunity to bring Northern Ireland legislation in line with corresponding law in Ireland (notably the recent Intoxicating Liquor Act 2008) and indeed across the UK. Harmonised policies will benefit population health on the island and strengthen all-island policy overall. It is

our hope that the development of this legislation will facilitate the implementation of the Intoxicating Liquor Act whose provisions were put on hold pending further North/South discussions and consideration of issues relating to cross-border trade and smuggling .

We also welcome this consultation as a significant development towards the delivery of the vision set out in the *New Strategic Direction on Alcohol and Drugs 2006-2011* and the *Young People's Drinking Action Plan*.

We are delighted to follow on from IPH comments made in the consultation of alcohol labelling in the UK in March 2010.

We welcome the commitment made in this consultation document to afford further consideration to issues of minimum pricing and below cost selling of alcohol which has a significant cross-border dimension. As the issues of pricing and promotions are closely interlinked, most notably in times of economic recession, this would form a natural part of the development of policy on promotions.

Q3. Such new powers in relation to alcohol promotion may have impacts in other areas. DSD would welcome any comments or views you may have on the following or in any other areas which you may consider affected:

- Equality

				What are your reasons and how might any negative impact be minimised?
	Positive	Negative	None	
Religious Belief			x	
Political Opinion			x	
Racial Group			x	
Gender			?	See section on health impacts
Marital Status			x	
Age			x	

Persons with a disability or persons without			x	
Persons with dependents or persons without			x	
Sexual Orientation			x	

- Health

The serious consequences of alcohol-related ill-health in Northern Ireland are well described in the literature and in the consultation document. In Northern Ireland there are approximately 250 alcohol related deaths each year and the significant rise in alcohol-related admissions to hospitals in the past few years is ominous. At a time when departmental budgets are necessarily constrained, reducing unnecessary hospital admissions is imperative. There are approximately 20 alcohol related road deaths each year and in excess of 500 alcohol related road injuries each year. 60% of employers have reported problems due to alcohol misuse and overall the social cost to Northern Ireland industry as a consequence of alcohol related harm was estimated in 1997 to £238 million. More recently, the Minister for Health, Social Services and Public Safety has revealed that the cost of treating drug and alcohol addiction is over £7million.

Alcohol-related harm is strongly socially patterned, even when alcohol consumption is not. This apparent anomaly is often considered to reflect that poverty and disadvantage may amplify the negative effects of excessive alcohol consumption. Tackling excessive alcohol consumption through a variety of means including regulatory measures on promotion and pricing has the capacity to tackle health inequalities both in terms of the individual and indeed the negative effects experienced by their families and communities. In both jurisdictions the annual directly standardised mortality rate for deaths from alcohol abuse (including alcohol psychosis) in the lowest occupational class was significantly higher than the rate in the highest occupational class (280%) (*Inequalities in mortality 1989-1998. A report on all-Ireland mortality data, IPH, 2001*) Alcohol also plays an important part in deaths attributed to other diseases and to accidents and injuries.

Recent IPH work points to the dramatic rise in chronic disease including

mental illness, obesity-related illness, chronic liver disease, cardiovascular disease and stroke. Alcohol contributes to this alarming rise. Of particular concern is the role that alcohol may play in affecting the mental health of people recently affected by adverse socio-economic conditions caused by economic downturn including unemployment, poverty and debt. Evidence suggests that alcohol is often a factor in increasing levels in suicides.

Alcohol has differing health and social impacts for males and females. Consumption patterns and behaviours as well as patterns of alcohol-related harm and disease are strongly gendered. Reasons include genetic factors (rates of alcohol metabolism, pregnancy, interaction of alcohol with gender-related disease such as breast cancer etc.) and social, cultural and economic factors.

Regulations affecting the promotion of alcohol as set out in the consultation document are presumed to have comparable effects for men and women. However, we would recommend that the impact of the regulations on men and women be given additional consideration particularly in terms of gender-specific promotions (e.g. 'ladies night'), marketing of alcohol designed to appeal to young boys or girls, (e.g. use of gendered animation characters) and the specific response of men and women/ girls and boys to different types of promotion.

The proposal will not be subject to a Health Impact Assessment (HIA) and IPH acknowledges that the intention of the proposal is to prohibit or restrict irresponsible alcohol promotions which has been noted as a positive contribution in tackling alcohol-related harm. IPH would suggest that a HIA would support the proposal to ensure that any unintended impacts were identified and mitigated and any positive impacts for health could be maximised. The Department of Health in England undertook a HIA on the *Review of the National Alcohol Harm Reduction Strategy for England* in 2007 which identified a number of areas for action to support the proposal. This report may be found at <http://www.apho.org.uk/resource/item.aspx?RID=90191>. Further information on HIA may be found at www.publichealth.ie/hia and IPH would be happy to discuss the potential benefits of HIA with DSD in relation to this proposal.

- Human rights

No comment

- Financial implications

No comment

- Aspects of the regulatory impact process

IPH welcomes the use of regulatory impact assessment in the document. However, we would view the issues of price and promotions as interlinked, in fact inseparable, so the preferred option would be to address option 2 – introduce a ban on irresponsible alcohol promotions in combination with other pricing interventions, including minimum pricing and banning below-cost sales of alcohol.

There a number of issues to be addressed in pricing relating to competition law and retail, but perhaps a commitment should be made to address these within a maximum of 12 months of passing of legislation on promotions. Any consideration of pricing strategy will need to encompass cross-border trade and smuggling issues.

- Rural issues

No comment

- Any other issues/areas which you feel may be affected

The Freedom of Information Act 2000 gives the public access to any information held by a public authority, namely the Department in this case. This right of access to information includes information provided in response to a consultation. Your response, and all other responses to the consultation, may be disclosed on request. If you would like your response to be treated as confidential, please indicate below.

I would like my response to be treated as confidential No

Thank you for taking the time to provide your response to this consultation.

Responses should be sent to:-

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