

**Cyflwynwyd yr ymateb i ymgynghoriad y [Pwyllgor Iechyd a Gofal Cymdeithasol ar Isafbris Uned am Alcohol yng Nghymru](#)**

**This response was submitted to the [Health and Social Care Committee](#) consultation on [Minimum unit pricing for alcohol in Wales](#)**

**MUP05 : Ymateb gan: Bwrdd Iechyd Aneurin Bevan | Response from: Aneurin Bevan University Health Board**

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<b>Title</b>	ABUHB response to the Welsh Parliament Health and Social Care Committee's short written enquiry into Minimum Unit Pricing in Wales <a href="#"><u>Minimum unit pricing for alcohol in Wales</u></a>
<b>Date</b>	14.04.2025
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### Public understanding of MUP

- ***Minimum unit pricing is a targeted health improvement measure which aims to reduce alcohol consumption among people drinking at harmful levels. How effectively has the purpose of the legislation been communicated to the general public and to businesses affected?***

Substance Use Services in Gwent worked hard to help people accessing their services understand Minimum Unit Pricing when it was introduced. They felt that the legislation in itself was clear to people working in the alcohol system and to the people most effected by the change, such as those delivering or accessing their services, and to retailers, such as off licenses. However, the legislation and its purpose were not perceived by the Alcohol Pathway Group to have been well communicated in general at the time or during the period since.

The information, which was delivered at the beginning of the legislation but hasn't been regularly communicated to the public since, focussed too much on the price increase of alcohol and too little on alcohol-related harms and the aim of reducing them. Reducing the financial costs of alcohol is not a commonly stated goal for people accessing alcohol support services in Gwent.

The information was also not considered to be clear enough, with services concerned that perceived counter messaging from the alcohol industry, as well as the timing of the Covid-19 pandemic, may have resulted in some confusion for the public. As the legislation was introduced at the same time as the start of the Covid-19 pandemic and its associated lockdowns and social distancing, there appeared to be a misunderstanding amongst some that the changes to alcohol pricing were part of the measures to help prevent the spread of infection.

### Impact of MUP

- **What impact has minimum unit pricing had on alcohol-related harm in Wales?**
- **What impact has the introduction of minimum pricing had on particular groups, including:**
  - **vulnerable and dependent drinkers**
  - **children and young people**
  - **low-income households**

- **What impact has the introduction of minimum pricing in Wales had on (i) retailers and (ii) local authorities?**
- **What impact has minimum unit pricing had on the need for alcohol treatment and support services?**
- **What impact has minimum unit pricing had on the risk of substituting alcohol for more dangerous and illegal substances?**

It is too early to assess the impact that Minimum Unit Pricing has had on alcohol harms in Wales. The Alcohol Pathways Group agreed causation cannot be made between the legislation and any differences, positive or negative, to alcohol related harms in Gwent. This is especially the case due to the timing of the Covid-19 pandemic, and the resulting effects this may have had on people's patterns of alcohol consumption and any associated harms. For example, modeling into the impact of changes in alcohol consumption during the COVID-19 pandemic on future alcohol-related harm in England estimated that, in the best-case scenario, there would be an additional 1,830 alcohol-specific deaths over 20 years in England, which rose to 25,192 deaths in the worst-case scenario<sup>1</sup>.

In Wales, the number of alcohol-specific deaths has increased year-on-year since 2019<sup>2</sup>. One of our Local Authority areas, Blaenau Gwent, continues to report the highest rate of alcohol-specific deaths in Wales (based on an age standardised rate over a 3-year rolling aggregate)<sup>3</sup>. While data shows alcohol specific and related hospital admissions have been reducing in Gwent<sup>4</sup>, anecdotal evidence from hospital staff suggests this may not be the case for alcohol-related hospital attendances that do not result in admission, as these are not perceived to have declined.

In Gwent, there has not been a decrease in the number of vulnerable or dependant drinkers accessing substance use services, however it has been noted they are no longer drinking the low cost, high strength white cider that the MUP legislation aimed to reduce.

There has been no noticeable impact of MUP on babies, children and young people in Gwent. The effects of MUP on alcohol consumption during pregnancy are unknown. The percentage of 11-16-year-olds in Gwent self-reporting drinking alcohol has reduced between 2021 and 2023<sup>5</sup>. However, the majority of young people supported by substance use services in Gwent do not obtain their alcohol by purchasing it from traditional retailers.

In Gwent, over 17% of those aged 16+ self-report an average weekly alcohol consumption above Chief Medical Officer guidelines of 14 units a week, with figures ranging from 15.2% in Newport to 25.4% in Monmouthshire<sup>6</sup>. Despite this, Monmouthshire, our Local Authority area with the lowest levels of deprivation remains the least affected in Gwent by alcohol specific and related harms. However, Public Health Wales notes that between 2023 – 2024, the proportion of all patients admitted to hospital for alcohol-specific conditions who lived in the 10 per cent of most deprived areas of Wales was 2.8 times higher than those from the least deprived areas<sup>7</sup>.

Prior to the introduction of MUP, there were concerns that the legislation would increase the risk of people substituting alcohol for more dangerous substances. However, in general, services in Gwent have not found this to be the case and do not feel MUP has increased the sale or consumption of

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<sup>1</sup> [Modeling the impact of changes in alcohol consumption during the COVID-19 pandemic on future alcohol-related harm in England. - Drugs and Alcohol](#)

[Alcohol-specific deaths in England and Wales by local authority - Office for National Statistics](#)

<sup>3</sup> [Alcohol-specific deaths in England and Wales by local authority - Office for National Statistics](#)

<sup>4</sup> [Data Mining Annual Profile Template](#)

<sup>5</sup> [Children's Health & Well-being Dashboard](#)

<sup>6</sup> [PHOF Reporting Tool](#)

<sup>7</sup> [Data Mining Annual Profile Template](#)

home-brewed alcohol. While there are always exceptions, for example the consumption of publicly available hand sanitiser instead of alcohol as it is free, these are extreme cases and cannot be linked to the introduction of Minimum Unit Pricing.

In terms of the impact the introduction of minimum pricing in Wales had on (i) retailers and (ii) local authorities, the reduction in the sale of cheap, white cider has already been noted. However, the Alcohol Pathways Group felt that, with the help of industry/retail marketing and promotion strategies, there has been a shift in consumer preferences from these products, to higher priced/'premium' ones, rather than a reduction in overall sales. This reflects findings in the evaluation of MUP in Scotland, which noted a reduction in purchasing of high-strength ciders but an increase in the promotion and purchasing of 'premium' spirits<sup>8</sup>.

Those accessing support with alcohol from services in Gwent are often drinking alcohol at home or in outdoor areas, rather than at their local licensed premises. Since the introduction of MUP, the retail landscape for alcohol has changed and there is increased 'off-trade' availability and accessibility, for example due to online deliveries available 24/7. Regarding 'on-trade', there has been a rise in popularity of alcohol promotion such as bottomless brunches, and the Alcohol Pathways Group are concerned that such offers' adherence to MUP may be difficult to assess and enforce.

#### **Future of MUP in Wales**

- **Should minimum unit pricing continue in Wales? Why?**
- **Should the current minimum unit price of 50p be reviewed? Why?**
- **Minimum unit pricing is intended as one of a range of policy approaches to tackling alcohol-related harm. Do any other approaches need to be considered/strengthened in order to reduce alcohol-related harm in Wales?**

We are supportive of Minimum Unit Pricing continuing in Wales and raising the price at least in line with inflation.

While it is too soon to measure the local impact of Minimum Unit Pricing, the link between reduced affordability with reduced alcohol consumption is well-established. The World Health Organisation (WHO) recognises alcohol pricing policies as the most effective and cost-effective measures to decrease alcohol consumption and related harms, which includes those to health and wider society<sup>9</sup>. It also noted that for the benefits of MUP to be achieved, the MUP threshold needs to be set at a level which actually affects the prices faced by consumers.

An evaluation of MUP in Scotland<sup>10</sup>, which introduced the legislation before Wales, found it reduced deaths and hospital admissions concerning alcohol, especially amongst men and those living in the most deprived area. An additional public health benefit was a statistically significant reduction in sugar from alcohol consumption. However, the evaluation found some evidence of negative consequences for those with alcohol dependence on low incomes, such as increased financial strain among some economically vulnerable individuals with alcohol dependence who maintained consumption, and some who reduced spend on food.

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<sup>8</sup> [Evaluating the impact of minimum unit pricing for alcohol in Scotland: Final report](#)

<sup>9</sup> [9789289058094-eng.pdf](#)

<sup>10</sup> [Evaluating the impact of minimum unit pricing for alcohol in Scotland: Final report](#)

In Gwent, we are therefore supportive of a level which has a positive impact on population health outcomes, while mitigating for any harmful consequences that the price may have on the those most economically vulnerable.

Public Health Wales labels MUP as one of the “Best Buys” for reducing alcohol consumption, harms and socioeconomic costs<sup>11</sup>. However, it notes additional “Best Buys” are needed, which include limiting alcohol availability (e.g., through reduced outlet density or hours of sale) and stricter regulation of alcohol advertising.

In Gwent, we strongly believe Minimum Unit Pricing should be used as part of a wider policy and regulatory framework to reduce alcohol consumption and related harms, which includes reducing not only the affordability, but also the accessibility and availability of alcohol. This will include the need to consider how to ensure online orders are not delivered to those underage or already under the influence of alcohol. It will also need to consider the effects of the commercial determinants of health, the role of the alcohol industry, and alcohol advertising, even when these are related to no or low alcohol versions of popular alcohol brands.

Many people accessing alcohol services in Gwent have encountered trauma or adverse experiences in their past, resulting in current complex, co-occurring health and social care needs. As such, to reduce alcohol harms, the wider determinants which influence health and wellbeing must also be improved and a whole life-course approach taken.

Alongside preventative policy to positively influence whole-population health, timely and high-quality treatment and recovery services will still be required for people with alcohol dependence, as well as support for their concerned others. In Gwent, we believe that in order to develop a whole-system approach to reducing alcohol-related-harms, an updated national substance use strategy is required. It should ensure cross government commitments; clear roles and responsibilities; and appropriate resource and direction for the planning and commissioning of substance use prevention, early identification and support services.

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<sup>11</sup> [icc.gig.cymru/pynciau/camddefnyddio-sylweddau-cyffuriau-ac-alcohol/tystiolaeth/alcohol/ffeil-docs-alcohol/a-guide-to-public-health-and-alcohol-licensing/](http://icc.gig.cymru/pynciau/camddefnyddio-sylweddau-cyffuriau-ac-alcohol/tystiolaeth/alcohol/ffeil-docs-alcohol/a-guide-to-public-health-and-alcohol-licensing/)