

Submission to the Local Government and Transport Committee of the Scottish Parliament from the Scottish Association of Alcohol Action Teams

The Scottish Association of Alcohol Action Teams (SAAAT) is a voluntary association representing all Alcohol Action Teams (AATs) or their equivalents. AATs are multi-agency teams working at local level to reduce the harm caused by alcohol. The main aim of the Association is to represent local Action Teams as a body and provide a channel through which government (centrally and nationally) may obtain the views of the Association's membership on major policy areas or issues of collective concern.

We welcome the recommendations of the Licensing Scotland Bill 2005 and, in particular, the five licensing objectives, the rewording of the fourth objective on public health i.e. "protecting and improving public health", the introduction of premise licences that replace the 7 types of licences and the new personal licence. However, the SAAAT has concerns regarding the sale of alcohol from premises previously referred to as 'off-sales'.

These concerns focus on:

- ❖ the pricing of alcohol
- ❖ irresponsible drinks promotions relating to "off-sale" premises
- ❖ the sale of alcohol to young people (16/17 year olds)
- ❖ anti-social behaviour that occurs in the vicinity of shops licensed to sell alcohol
- ❖ the training of sales staff.

Pricing of alcohol

Under Schedule 3, paragraph 7.2 states that "the price at which any alcohol is sold on the premises must not be varied during the period of 48 hours with the time at which the price at which that or any other alcohol is sold on the premises was last fixed". However, the preceding paragraph confines that regulation to alcohol to be consumed on the premises and it will not be applicable to off-sales premises.

In recent years, there has been an increase in the amount of alcohol sold in off-licences from 26% to 40% of total alcohol sales. We recognise that there are several contributory factors for this shift; we consider that one of the strongest is the cost of alcohol. Many people now commence drinking alcohol before embarking on an evening out with one of the reasons for this being the high cost of alcohol in many pubs and clubs. Restricting the availability of promotions in on-licensed premises will be perceived as creating an even higher cost for alcohol and may cause a greater shift to off-sales.

Irresponsible drinks promotions

In our response to the consultation on the White Paper, the Association stated it would wish to recommend a condition which aimed to stop irresponsible promotions. This appears to have been taken on board for on-sales but nothing has been put in place to regulate off-sales. A particular concern is with high volume suppliers such as supermarkets, which can be considered to encourage excessive drinking through deep discounting of beer or wine. An example of this is of beer being sold for as little as 37p for a 330ml can of Pilsner (4.95% abv). By comparison, a 330ml of Coca Cola would retail between 40p and 45p. Other promotions include 50% discount on wines, offers such as 3 litres for the price of 2, or buy one get one free.

The Association would strongly urge the Committee to consider the application of price regulation to off-sales premises.

Sale of alcohol to young people and anti-social behaviour that occurs in the vicinity of shops licensed to sell alcohol

There is little research evidence to indicate that an increase in anti-social behaviour occurs in the vicinity of shops licensed to sell alcohol. However a trawl of local media and anecdotal information from residents of local communities provide illustrations of the types of problems that occur around these types of premises. These were recognised by the Daniels Committee.

In order to inform further the debate, the SAAAT has recently commissioned a literature review on the sale of alcohol in the community that seeks to clarify:

- ❖ the prevalence of selling to underage drinkers (aged under 18 years)
- ❖ the existence (or otherwise) of evidence that cut-price drinks promotions encourage harmful or hazardous drinking
- ❖ increased anti-social behaviour around off-licences
- ❖ evidence of the effects that an off-licence can have on the community in general
- ❖ evidence of effectiveness of training for off sales staff

We would be pleased to share the findings with the Committee.

It is the view of the Association that further research requires to be carried out in order to glean a wider view on this issue that cuts across all the licensing objectives.

Staff Training

In respect of training for those who sell alcohol in shops, there appears to be a variance in the uptake of training across the country.

A recent telephone survey of ServeWise Plus off-sales trainees revealed that staff consider the licensing law as irrelevant to sales in the community, and perceive alcohol as just another commodity in a way that does not require special attention.

Whilst the Bill recommends 'staff may not sell alcohol or serve alcohol for consumption on the premises unless they have been trained', this does not seem to apply to those employed in shops. In addition, the high number of temporary staff employed in off-sales and on-sales indicates that training of staff considered 'permanent' i.e. more than 4 months full time or part time employment, will not be sufficient to ensure adequate knowledge amongst serving staff at any one time.

Conclusion

We welcome the modernisation of licensing legislation but would urge the Committee to review the varying treatment of "on and off sales" of alcohol to ensure that the licensing objectives can be upheld fully.

20th April 2005