



Scottish Health Action on Alcohol Problems (SHAAP) response to HM Revenue and Customs consultation on Soft Drink Industry Levy

October 2016

Scottish Health Action on Alcohol Problems (SHAAP) welcomes the opportunity to comment on the new Soft Drink Levy. SHAAP provides the authoritative medical and clinical voice on the need to reduce the impact of alcohol related harm on the health and wellbeing of people in Scotland and the evidence-based approaches to achieve this.

SHAAP was set up in 2006 by the Scottish Medical Royal Colleges through their Scottish Intercollegiate Group (SIGA). As a partnership, it is governed by a Steering Group made up of members of the Royal Colleges.

SHAAP works in partnership with a range of organisations in Scotland and beyond. Key partners include Alcohol Focus Scotland, the British Medical Association (BMA), the Scottish Alcohol Research Network (SARN), the Alcohol Health Alliance, the Institute of Alcohol Studies, Eurocare and the European Public Health Alliance (EPHA).

Question 11

We seek evidence and views from respondents on the types of added-sugar alcohol products that may be captured by the levy, and the appropriate approach to these products in the levy legislation

We broadly welcome and are pleased to note the inclusion of high sugar, low alcohol products as part of the Levy proposals. This will be important for regulating the sugar content of these products.

Alcohol and the harms it causes are a major cost to society. Excessive alcohol consumption causes harm to communities, families, public services, the economy and individual health and wellbeing. In Scotland in 2016, average per adult weekly consumption was 20.8 units¹, 3.4 units more than the weekly per adult average in England and Wales. This higher level of consumption is estimated to cost Scotland over £2 billion every year². A move towards lower strength alcohol products has been put forward as a potential solution. The Scottish Government, in their Alcohol Strategy, suggest that the introduction of Minimum Unit Pricing for alcohol could incentivise producers to produce lower

¹NHS Health Scotland (2016) Monitoring and Evaluating Scotland's Alcohol Strategy, Alcohol consumption and price in Scotland 2015 <http://www.healthscotland.com/uploads/documents/27345-00.%20Alcohol%20consumption%20and%20price%20in%20Scotland%202015%20-%20May2016.pdf>

² <http://www.shaap.org.uk/health-costs.html>

strength alcohol products³. Therefore, the Levy should be set at a level which does not discourage a shift in consumption patterns to lower strength alcohol products, as an alternative to higher strength, more damaging products.

We question whether a Levy for soft drinks is an appropriate mechanism to regulate products containing alcohol. We are concerned that the inclusion of such products under a Soft Drinks Levy will result in these products being viewed as soft drinks rather than as products containing alcohol. This includes products such as shandies and caffeinated pre-mixed alcohol (energy) drinks. Although containing a minimal amount of alcohol, the products nevertheless still do contain alcohol. Such products are heavily branded and marketed to appeal to young people, and often are difficult to distinguish from similar products which do not contain any alcohol⁴. Such products are often sweeter and so are likely to be more attractive to children. We call for the current regulation permitting the sale of 0.5% and less alcohol content products to under 18s to be changed. The sale of products containing any alcohol should not be permitted to minors.

We are also concerned about the contribution of these products to growing levels of (childhood) obesity and the burden of disease caused by these additional calories. Newly published research by Cancer Research UK highlights high levels of childhood and adult obesity in Scotland. In 2014/15, 15% of primary school pupils were classified as overweight or obese, and Scotland has one of the heaviest populations in Europe⁵. Given the high sugar content in many of these low-alcohol products, we believe these products should be subject to a Levy or additional taxation to minimise the harmful effects of the additional sugar in the products.

Contact

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For more information about SHAAP, please visit <http://www.shaap.org.uk/>

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/224075/alcohol-strategy.pdf

³ Scottish Government (2008) Changing Scotland's relationship with alcohol: a discussion paper on our strategic approach <http://www.gov.scot/resource/doc/227785/0061677.pdf>

⁴ <https://www.ncadd.org/about-addiction/alcohol/alcohol-energy-drinks>

⁵ http://www.heraldscotland.com/news/14793706.83_000_children_started_primary_school_overweight_in_last_decade_report_reveals/