

**National Assembly for Wales / Cynulliad Cenedlaethol Cymru**  
**[Health and Social Care Committee / Y Pwyllgor Iechyd a Gofal](#)**  
**[Cymdeithasol](#)**

**[Inquiry into alcohol and substance misuse / Ymchwiliad i](#)**  
**[gamddefnyddio alcohol a sylweddau](#)**

**Evidence from The Association of Convenience Stores – ASM 25 /**  
**Tystiolaeth gan Cymdeithas Siopau Cyfleustra – ASM 25**



**National Assembly of Wales**

**Health and Social Care Committee inquiry into Alcohol and Substance abuse**

**Introduction**

1. ACS (the Association of Convenience Stores) welcomes the opportunity to respond to Health and Social Care Committee's inquiry into alcohol and substance misuse. ACS represents 33,500 local shops across the UK including the Co-operative Group, Spar UK, Nisa Retail, Costcutter and thousands of independent retailers. In Wales there are 3,219 convenience stores that account for 24,530 jobs<sup>1</sup>.
2. Retailers have a considerable interest in the regulatory and voluntary framework surrounding the sale of alcohol. Alcohol sales in the UK convenience market, on average, account for 12.8% of total sales<sup>2</sup>. Retailers take their responsibility for the sale of alcohol very seriously and have proactively worked with the Welsh Government to create both a regulatory and voluntary framework to deliver responsible retailing and marketing of alcohol products.

**Health Data on Positive Action**

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<sup>1</sup> ACS Local Shop Report Wales 2014

<sup>2</sup> ACS Local Shop Report 2014

3. We hope that the committee recognise that evidence from a large number of sources shows that significant progress has been made in preventing alcohol harm across Wales and the UK in last 10 years. Consumption levels across the UK population have dropped significantly<sup>3</sup> between 2005 and 2012. The percentage of those drinking over the recommended guidelines on their heaviest drinking day has also fallen between 2005 and 2012. Men dropped from 41% to 34% and the women from 34% to 26%.<sup>4</sup>
4. National policies on preventing alcohol harms must be proportionate and build upon the successes that have already been achieved. We understand that retailers have an important role to play in encouraging this change too, and we have been working through the UK's Government Responsibility Deal Alcohol Network to achieve this. One of the pledges of the responsibility deal has already reached its target to reduce the number of alcohol units in the market 1 billion by the end of 2015. It reached its target ahead of the goal in December 2014 with 1.3 billion units pledged to be removed from sale<sup>5</sup> through product reformation and range reviews.

### **Industry Action to Prevent Alcohol Harm to children**

5. The industry has also taken proactive action to prevent young people from accessing alcohol. The off-trade has led the way in introduction age verification schemes such as 'Challenge 25' and partnership schemes such as Community Alcohol Partnerships. This has helped to significantly reduce the number of young people consuming alcohol; the Health and Social Care Information Centre identifies the number of 11-15 year olds that reported drinking alcohol in the past week has fallen from 25% in 2003 and 12% in 2011 to 9% in 2013<sup>6</sup>.

### *Age Verification Policy*

6. Retailers have been heavily engaged with a number of age verification schemes including 'Challenge 25'. Polling of ACS members in 2012 showed

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<sup>3</sup> [ONS: Drinking Habits Amongst Adults 2012](#)

<sup>4</sup> [Portman Group: Trends in Alcohol – A compilation of data from across the UK](#)

<sup>5</sup> [Responsibility Deal: Monitoring the number of units of alcohol sold – Second interim report 2013 data](#)

<sup>6</sup> [HSCIC Smoking, drinking and drug use among young people in England in 2013](#)

that 70% of retailers had an age verification policy in store and it was found that more than a quarter of retailers refused age restricted sales more than ten times a week<sup>7</sup>. The policy ensures that anyone that looks under 25 is challenged for proof of age. It is made up of several components including training, display of signage, staff support, record keeping and guidance and clarity on acceptable forms of ID. ServeLegal, an independent test purchasing company, found in 2014 that convenience stores had an 82% pass rate<sup>8</sup>.

7. The success of preventing underage sales in the off trade has resulted in an increase in proxy purchasing where family members or others buy alcohol on behalf of young people. Data shows that young people are more likely to access alcohol by buying from friends (53%) or someone other than family or friends (34%)<sup>9</sup>. We believe more action is needed to tackle proxy purchasing and educate adults about the risks and penalties associated with this. ACS commissioned research by the think tank Demos that made a number of policy recommendations including tougher penalties for proxy purchasing and naming and shaming parents/ siblings<sup>10</sup>.

### *Community Alcohol Partnerships*

8. Age verification schemes like 'Challenge 25' are only one part of a wider programme of activity supported by the industry to prevent young people accessing alcohol. Community Alcohol Partnerships (CAP)<sup>11</sup> bring together local retailers & licensees, trading standards, police, health services, education providers and other local stakeholders to tackle the problem of underage drinking and associated anti-social behaviour. This partnership approach should be taken across the UK. ACS is committed to working with partners to see more CAPs established in Wales, and we would welcome any support the Welsh Assembly Government could offer in promoting these effective partnerships.

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<sup>7</sup> ACS Voice of Local Shops May 2012 Data

<sup>8</sup> Serve Legal, Independent Test Purchasing Key Trends 2014 YTD

<sup>9</sup> [HSCIC Smoking, drinking and drug use among young people in England in 2012](#)

<sup>10</sup> Demos: [Sobering Up](#)

<sup>11</sup> [Community Alcohol Partnership](#)

9. ACS is a founding member and funder of CAP, and their work to prevent under age sales is unrivalled. We urge the committee to consider how they can promote the work of CAP in their recommendations to the Welsh Government. The development of more CAP programmes across Wales would be a positive step to preventing young people accessing alcohol.

### **Industry Action to Prevent Alcohol Harm to Street Drinkers**

10. We recognise concerns about the problem of street drinkers and the high strength alcohol products associated with this. Convenience stores have a role to play in preventing this form of alcohol harm, and almost half (43%) of convenience stores do not stock high strength lager and ciders in their stores<sup>12</sup>.
11. We have seen over the last 18 months the proliferation of local authority “Reducing the Strength” schemes, which attempt to partner with retailers in order to remove high strength alcohol products from their shelves. Analysis by the British Beer and Pub Association suggests there are 84 different Reducing the Strength Schemes now running across England and Wales. The industry has faced significant challenges keeping pace with the numbers of Reducing the Strengths Schemes and the varying quality and approach of different authorities to running these schemes.
12. The most effective schemes work with a range of partners including; retailers, police, local charities and health agencies to tackle the problem. Ipswich and Portsmouth are great examples of best practice of these schemes. However, some schemes lack focus and fail to engage retailers or recognise the competition risks they present for retailers. ACS believes if schemes are managed effectively they can reduce alcohol related harm. We welcome that the Competitions and Market Authority have published guidance to clarify the legal status of these schemes. We also welcome Local Government Authority’s guidance which discusses good practice in local schemes. We

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<sup>12</sup> ACS Voice of Local Shops November 2014 Data

would like to see more consistency on how these schemes are run throughout the UK.

### **Non-Duty Paid Alcohol**

13. We urge the Committee to also look at the problem of irresponsible retailers selling non duty paid alcohol and associated alcohol harm problems with these premises. Research from Portsmouth Council has shown a strong correlation between retail premises selling non-duty paid alcohol at low costs and breaching other licensing conditions. The audit of off trade premises by Portsmouth Council found that out of 156 stores, 28 stores were found to be selling products that the Portman Group had noted that are not for the UK market, which suggests possible links to duty fraud.
14. Targeting enforcement action against irresponsible retailers selling non-duty paid goods is likely to be more effective by removing not duty paid goods and cheap high strength product that is associated with street drinking. Local authorities already have the power to revoke licenses of premises selling non-duty paid alcohol and we would to see this used more frequently. ACS is working with HMRC by chairing the Joint Alcohol Anti-Fraud Taskforce Illicit Trade at Retail Level Working Group to encourage local authorities to use their existing licensing powers to remove licences from retailers involved with duty fraud.
15. Targeting retailers operating illegally would be a fairer, more effective way of addressing alcohol than any suggestion of implementing arbitrary limits on the number of premises selling alcohol, or imposing new regulatory restrictions on responsible retailers.

### **Health Policy Wales**

16. The Welsh Government is currently considering the development of its Public Health Bill and ACS' submission to the consultation is available here<sup>13</sup>. We welcome the opportunity to consult on future proposals we urge the

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<sup>13</sup> [ACS Response to Welsh Public Health Consultation](#)

committee and Welsh Government to engage with the retail industry on future proposals and recognise the significant progress that has already been made.

For further information on this submission please contact 