

29<sup>th</sup> March 2012

Mr Kenny Harrison  
Argyll and Bute Council  
Kilmory  
Lochgilphead  
Argyll  
PA31 8RT

Dear Mr Harrison

### **Re Discussion of the Rethinking Alcohol Licensing Report**

I have been passed a copy of the document pack discussed at the last Forum meeting on the 24<sup>th</sup> of January 2012. I note that the *Re-thinking Alcohol Licensing* report was discussed at the meeting and it is also recorded in the minutes that this was discussed at the previous meeting on 26<sup>th</sup> October 2011.

While I am delighted that the *Re-thinking Alcohol Licensing* report has been the subject of discussion at the Argyll and Bute Licensing Forum, I am concerned that it appears there may have been some misunderstanding or misrepresentation concerning the report. The October minutes record the following:

*Alcohol Focus Scotland had circulated copies of the report "Re-thinking Alcohol Licensing" to all key stakeholders including Local Licensing Forums. The document contained key recommendations for Licensing Boards, Licensing Forums and Local Authorities that related to the five licensing objectives contained within the Licensing Scotland Act.*

*The Forum had a lengthy discussion on whether it would be appropriate to draft a response to this document at this stage or to wait to see if any of the recommendations contained within the report would mean a change in licensing legislation further in the process. The Forum discussed the culture of drinking in Scotland and whether the introduction of curfews and the staggering of venue closing times would be effective in reducing problems of crowds at closing times. They also discussed initiatives such as serving soft drinks and coffee 1 hour before closing time.*

I would like to clarify that the *Re-thinking Alcohol Licensing* report is concerned with the links between licensing and the significant rise in the consumption of alcohol from the 1960s onwards and the associated rise of alcohol-related harms. The report notes that:

*"In Scotland, greater availability of alcohol through more and bigger-capacity licensed outlets, longer licensing hours and increased affordability and marketing, have been associated with a substantial rise in alcohol consumption and harm. Over the past two decades Scotland has had one of the fastest growing liver cirrhosis mortality rates in the world"*

The report is clear about the evidence concerning the effects of increasing availability.

*“Empirical evidence shows that increasing access to alcohol, through more outlets and longer trading hours, is linked to a range of alcohol-related harms and in certain circumstances, levels and patterns of consumption. ...Overall, the weight of evidence supports the conclusion that restrictions on the availability of alcohol can contribute to a reduction in alcohol-related problems.”*

It is, therefore, surprising that discussion of the report should lead to a discussion on the possibility of extending licensing hours. The report is clear that greater availability of alcohol, through greater numbers of premises and longer opening hours, is a significant contributor to the current levels of consumption and harm.

The report goes on to recommend that Licensing Boards consider the overall effects of the licensed premises in their area on the levels harm and that they assess for overprovision over larger areas by considering the range of evidence available.

The report, therefore, does not contain any support for the idea of extending licensed hours - indeed it suggests the opposite.

I trust that you will take the clarifications I have made into consideration in any further discussion of this matter.

Yours sincerely

Mary Ellmers  
Head of Training & Development

cc Charles Reppke, Head of Governance and Law, Argyll and Bute Council