

Association of Directors of Public Health Yorkshire & Humber

Response to the Home Office and Department for Business and Trade Call for Evidence: Reforming the Licensing System

October 2025

Purpose and scope of call for evidence

The government invited views and evidence to inform the development of a “modern, proportionate and enabling licensing system”. This [call for evidence](#) built on the [Licensing Taskforce recommendations and the government’s response](#) and supports the government’s [commitment to reduce regulatory burdens by 25%](#) by the end of this Parliament.

About ADPH Yorkshire and Humber Network

The Association of Directors of Public Health Yorkshire and Humber Network (ADPH YH) is a professional network of Directors of Public Health and health system leaders from across Yorkshire and Humber. It exists to support the delivery of better public health outcomes in Yorkshire and Humber and is a regional sub-group of the UK-wide [Association of Directors of Public Health](#).

In March 2024, ADPH YH published a consensus statement on the commercial determinants of health, which are defined in the 2023 Lancet Series as ‘*the systems, practices, and pathways through which commercial actors drive health and equity*’.¹ We recognise the impact of commercial activities on our health and society and have made a joint commitment to counter harmful commercial practices which include industry engagement in young people’s education, widespread marketing of unhealthy products, or shaping policymaking in favour of industry interests over the public good. We have committed to take action through local levers as well as via opportunities to shape national policy and the system which facilitates these harmful practices.

Introduction to our response

Please note that this response was written before the ADPH Yorkshire and Humber work on communicating for impact about commercial influences was completed. There may therefore be opportunities to strengthen some of the phrasing to align with [best-practice framing guidance](#).

¹ Gilmore et al (2023) Defining and conceptualising the commercial determinants of health. [The Lancet 401:10383, 1194-1213](#).

Yorkshire and the Humber has some of the country's worst rates of alcohol-related deaths and hospital admissions for conditions caused wholly or in part by alcohol², and therefore stands to have among the most to lose by the introduction of policies which:

- Have been developed by companies who profit from alcohol sales, a direct conflict of interest with reducing alcohol-related harms
- Seek to prioritise business interests and make it more difficult for local areas to locally determine where, when and how alcohol is sold, which are key determinants of alcohol-related harms in our communities.

Companies selling alcohol should not set government policy

The Licensing Taskforce was launched by HM Treasury in April 2025, completed in May and reported in July 2025. The Taskforce was co-chaired by the CEO of Greene King pubs chain, with membership dominated by other alcohol and hospitality industry representatives. There was no Department for Health and Social Care representation. The [Government response](#) was published on the same day as the Taskforce report and committed to taking forward ten key recommendations.

Our response to the call for evidence therefore highlights the inherent conflicts of interest at play in the licensing reforms proposals; the alcohol industry has been given a leadership role in government policy, presenting significant risks to public health and thwarting efforts to address alcohol-related harms in effective and sustainable ways.

Local communities should have the power to shape their own neighbourhoods

The National Licensing Policy Framework proposals include adding an 'economic development' licensing objective and instating a requirement that licensing decisions are 'necessary and proportionate' to promoting licensing objectives.

The core purpose of licensing is to create guardrails for public protection in relation to products or services which can be harmful or present risks to our society. However, the Taskforce and proposed licensing reforms seek to fundamentally change the purpose of licensing without the scrutiny of full legislative reform. Moving the sole focus of our country's licensing objectives away from protecting the public would mean local residents' voices would carry less weight, meaning that companies could sell alcohol in more places or for more of the time even if the majority of local people don't want that to happen. Such a move in a democratic society deserves full scrutiny through our legislative processes.

Scope is potentially wider than pubs, restaurants and nightclubs

We note that although the call for evidence focuses on 'on trade' (e.g. pubs, restaurants, nightclubs) the Licensing Act 2003 itself also covers off-trade premises (supermarkets, corner shops etc), meaning that there is scope for proposals to affect regulation of alcohol sales much more widely.

² [OHID Fingertips Alcohol Profile](#)

Which sections we answered

Our response focuses on questions 7-11 on the Licensing Taskforce's recommendation that government "*establish a National Licensing Policy Framework*" and the impacts of the proposals on crime, public health, equality (questions 52-57 for us – question numbers may differ depending on your response to whether or not your organisation is a license-holder). However, the mandatory multiple-choice questions were also completed in line with the Alcohol Health Alliance guidance.

Local public health team responses

Alcohol Health Alliance have advised ***the more public health responses the better***, so we encouraged local authority Public Health teams to also submit local responses, possibly working with Licensing and Planning colleagues and other partners if capacity allowed. We encouraged colleagues to focus on key public health messages where time was limited.

Acknowledgements

This response draws heavily on a briefing from Fresh-Balance in the North-East and was also informed by draft responses from ADPH and Local Health and Global Profits.

The Alcohol Health Alliance's template was also referred to and drawn from when it became available in the later stages of drafting.

Question 7: Do you agree or disagree with the overarching objective of a consistent, transparent licensing system which empowers local authorities while promoting economic growth, cultural development, public safety and community wellbeing?

- ☐ Agree
- ☒ **Disagree**
- ☐ Don't know
- ☐ Prefer not to say

Explanation:

We do not agree to fundamentally changing the purpose of licensing away from a sole focus on public protection

The core purpose of licensing is to create guardrails for public protection in relation to products or services which can be harmful or present risks to our society, as is the case for alcohol. However, the Taskforce and proposed licensing reforms of making economic growth a licensing objective in a national framework seek to fundamentally change the purpose of licensing without the scrutiny of full legislative reform. Moving the sole focus of our country's licensing objectives away from protecting the public would mean local residents' voices would carry less weight, and that companies could be able to sell alcohol in more places or for more of the time even if the majority of local people don't want that to happen. Such a move in a democratic society deserves full scrutiny through our legislative processes.

Companies selling alcohol should not shape government policy on protecting the public from alcohol-related harms

The Licensing Taskforce was co-chaired by an alcohol industry representative without any Department for Health and Social Care representation. The alcohol industry has therefore been given a leadership role in shaping government policy, a conflict of interest which presents significant risks to public health and thwarts efforts to address alcohol-related harms in effective and sustainable ways.

Question 8: Do you agree or disagree that promoting economic growth should be a statutory licensing objective alongside the existing public safety objectives? A statutory objective is one that is defined in law and that licensing authorities are required to consider.

- ☐ Agree
- ☒ **Disagree**
- ☐ Don't know
- ☐ Prefer not to say

No free-text box for explanation

Question 9: Do you think that the licensing regime should treat on-trade and off-trade premises differently in any respects in order to allow the differing challenges and opportunities they pose to be addressed?

- ☐ **Yes**
- ☐ No
- ☐ Don't know
- ☐ Prefer not to say

Explanation:

Not answered

Question 10: What priority themes should be included in a National Licensing Policy Framework?

- ☐ Public safety and Crime Prevention
- ☐ Economic Growth and Reducing Business Burdens
- ☐ Culture & Community Cohesion
- ☐ **Community Health and Wellbeing**
- ☐ Supporting Growth, Highstreets and Night-Time Economies

List any other themes for inclusion:

Public health

We do not support the proposal to introduce a National Licensing Policy Framework. The Licensing Act is clear that its objective is to protect the public. This is accompanied by statutory guidance, which is reviewed regularly. The framework by which local licensing authorities should make decisions is already set out in this legislation and statutory guidance. Any priorities for licensing decisions should reflect the licensing objectives. If these priorities are to be amended, this should be done via full legislative reform and scrutiny. This process would also ensure that any changes or expansions to licensing objectives are in keeping with the overarching aims of The Licensing Act, and complement (rather than conflict) with all of its existing elements.

Question 11: How could the government assess whether national guidance is working effectively? Please suggest ways we could measure if national guidance is making a positive difference.

- ☐ Growth in the size of the sector and number of businesses
- ☐ **Lower rates of crime and ASB**
- ☐ **Lower rates of alcohol-related harm**
- ☐ Fewer people appeal decisions
- ☐ Other **(please tell us below)**

Comment:

Licensing has a protective purpose and its effectiveness should therefore be measured on this basis.

We are concerned by the suggestion that fewer appeal decisions could be a measure of success.

Questions 12-51

Only the mandatory multiple-choice questions were answered in this section, by necessity to submit our response. Our answers largely mirrored those of the Alcohol Health Alliance template:

Question 12: Do you agree or disagree that there should be an amnesty for licensing conditions as described above?

- ☐ Agree
- ☒ **Disagree**
- ☐ Don't know
- ☐ Prefer not to say

Question 18: Do you consider the costs associated with publishing statutory notices in local media are sufficiently transparent?

- ☐ Yes
- ☐ No
- ☒ **Don't know**
- ☐ Prefer not to say

Question 20: Are you answering on behalf of a business who has or has had a pavement licence or traded outdoors?

- ☐ Yes
- ☒ **No**
- ☐ Don't know
- ☐ Prefer not to say

Question 21: How long do you think pavement licences should be valid for? Pavement licences let businesses like cafes put tables and chairs on the street. How long should these licences last before needing renewal?

- ☐ 1 year
- ☒ **2-3 years**
- ☐ 5 years
- ☐ Permanent (with occasional reviews)
- ☐ Other (please tell us below)

Comment: (text box)

Question 23: Should alcohol in open containers (e.g. a drink poured in a glass) in pavement licence areas be treated as on-sales?

- ☒ **Yes**
- ☐ No
- ☐ Don't know
- ☐ Prefer not to say

Question 24: Is guidance necessary to support best practice in outdoor trading?

- ☒ **Yes**
- ☐ No
- ☐ Don't know
- ☐ Prefer not to say

Comment:

Guidance is important but should not be considered a replacement for specific conditions for outdoor sale at licensed premises.

Question 25: Do you support increasing the annual maximum number of TENs per licensed premises?

- ☐ Yes
- ☒ **No**
- ☐ Don't know
- ☐ Prefer not to say

Question 26: Do you agree or disagree with increasing the annual maximum number of TENs to 20 events over 26 days (the same limit that applied during Covid)?

- ☐ Agree
- ☒ **Disagree**
- ☐ Don't know
- ☐ Prefer not to say

Question 28: Do you agree or disagree with retaining the 24 hour gap between temporary events at licensed premises?

- ☒ **Agree**
- ☐ Disagree
- ☐ Don't know
- ☐ Prefer not to say

Question 30: Do you agree or disagree that conditions placed on premises licences should automatically transfer to TENs granted to those premises? Conditions placed on premises licences currently do not automatically apply to TENs. This question asks whether you think they should in future.

- ☒ **Agree**

- ☐ Disagree
- ☐ Don't know
- ☐ Prefer not to say

Question 31: Do you agree or disagree that blanket policies should be subject to regular review or sunset clauses?

- ☐ Agree
- ☒ **Disagree**
- ☐ Don't know
- ☐ Prefer not to say

Comment box / If there were regular reviews, what timeframe would be appropriate?

This question is misleading. There are no blanket policies preventing longer trading hours at licensed premises. Through 'core hours policies', some Statements of Licensing Policy offer guidance to applicants as to what types of applications licensing authorities generally grant and which types of application require more in-depth consideration. Such judgements are based upon the criteria set out in the licensing policy statement as to how decisions on later hours will be made. This is always on a case-by-case basis, to best promote the licensing objectives.

The guidelines in Statements of Licensing Policy are based on local evidence and consultation, and are already reviewed and subject to consultation every five years.

Question 33: Does the local authority area you operate in have any special licensing policies — for example, core hours, late-night levy schemes or other locally applied conditions?

This question asks whether you live or work in an area with special licencing policies. Please tell us if any special policies apply in your local area.

- ☒ **Yes**
- ☐ No
- ☐ Don't know
- ☐ Prefer not to say

If you answered 'yes', how has it affected your business or community? (text box)

The taskforce proposals undermine important efforts by licensing authorities to protect the public and reduce harm caused by alcohol. Statements of Licensing Policy enable local authorities to produce guidance that meets the needs of their local community and that responds to local challenges.

Question 34: The Proximity Test. Paragraph 8.13 of the section 182 guidance states that any individual or business entitled to make representations may do so “regardless of their geographic proximity to the premises”. Should there be a requirement for individuals and businesses who make representations in favour or against a licence application to be in geographic proximity to the premises?

- ☐ Yes
- ☒ **No**
- ☐ Don't know
- ☐ Prefer not to say

Question 35: Objections. Paragraphs 9.4 to 9.10 of the s.182 guidance seek to prevent irrelevant, vexatious or frivolous representations. Does this mechanism successfully eliminate such representations?

- ☐ Yes
- ☐ No
- ☐ Don't know
- ☒ **Prefer not to say**

If you answered 'no' please comment on what more could be done to minimise such representations? (text box)

The law clearly stipulates that representations should not be irrelevant, vexatious or frivolous. If applied properly, this should prevent inappropriate representations from going forward. Currently, representations where relevance is unclear are given the 'benefit of the doubt' and taken forward to committee. This is an essential protection against unaccountable gatekeeping by unelected administrative officials and the Taskforce recommendation that it be removed should not be taken forward.

Question 36 below is misleading. We have therefore responded 'don't know' to ensure that our response is not counted as approving reforms not made clear in the question itself. Representations are already required to address the licensing objectives. Any representation that does not address itself to the licensing objectives is ignored as it is not deemed relevant. If the proposal is to significantly increase the nature and scale of evidence required for representations to be accepted, and for this decision to be devolved to unelected licensing officers, as proposed in the Taskforce report, then this should be made clear. As it stands, reforms concerning evidence thresholds should not be taken forward on the basis of responses to Q36, because the question does not indicate the actual nature and scale of the changes being proposed.

Question 37 is also misleading. It does not explain to respondents that there is currently a requirement for conditions to be 'appropriate and proportionate'. Nor does it explain that the word 'necessary' was removed from the s182 guidance in 2011 because it established an unworkable threshold, and prevented licensing authorities from applying reasonable conditions if they could not demonstrate they were absolutely necessary to promoting the objectives.

Question 36: Improve Evidential Standards. Should there be a requirement that representations opposing a licence present the case and evidence for harms to one or more of the licensing objectives? In other words, only representations stating that there is an objection concerning the licensing objectives would count.

- ☐ Yes
- ☐ No
- ☒ **Don't know**
- ☐ Prefer not to say

Question 37: Necessary and Proportionate Test. Should there be a test applied to examine whether licensing conditions are necessary and proportionate?

- ☐ Yes
- ☒ **No**
- ☐ Don't know
- ☐ Prefer not to say

Question 38: Do you agree or disagree that the decisions of a licensing officer should carry greater weight with the licensing committee?

This question asks whether a licensing officer should have the status of an 'independent arbiter' whose decisions carry greater weight than those of other parties.

- ☐ Agree
- ☒ **Disagree**
- ☐ Don't know
- ☐ Prefer not to say

Question 40: Do you support enabling longer-term or perpetual licences for recurring festivals and events?

- ☐ Yes
- ☐ No
- ☒ **Don't know**
- ☐ Prefer not to say

Question 41: Would evidence of a safe and successful event held in previous years be sufficient evidence in most cases for granting licence extensions for repeat events?

- ☐ Yes
- ☒ **No**
- ☐ Don't know
- ☐ Prefer not to say

Question 43: Should the licensing regime give greater weight to the Agent of Change principle?

- ☒ **Yes**
- ☐ No
- ☐ Don't know

- ☐ Prefer not to say

Question 47: Should there be a requirement for local authorities to consult with local businesses, enforcement agencies and local residents on the creation of zones?

- ☐ Yes
☐ No
☐ Don't know
☐ Prefer not to say

Question 51: Which, if any, of the Licensing Taskforce recommendations do you expect to place the most significant burden on licensing authorities' capacity and ability to fulfil their usual function?

- ☐ National Licensing Policy Framework
☐ Licensing Condition Amnesty
☐ Remove Newspaper Advertising Requirement
☐ Outdoor Trading and Pavement Licences
☐ Increase TENs Entitlement
☐ Sunset Clause on Blanket Hours
☐ Arbitration, Evidence and Data Protocol
☐ Festivals and Events Licensing
☐ Agent of Change Principle
☐ None
☐ Don't know
☐ Prefer not to say

What measures would you suggest putting in place to mitigate any impact? (text box)

The proposals set out in the licensing taskforce report will undermine the licensing regime, fundamentally altering its purpose of public protection. This change in the purpose of the licensing regime is being proposed without adequate input from licensing authorities themselves, and without the scrutiny of full legislative reform.

The proposal to include a statutory objective of economic growth would introduce a conflict between the licensing objectives that will obstruct licensing authorities from fulfilling their function to protect the public.

Question 52: In your view what impact will the proposals for reform included in this Call for Evidence have on public safety or crime?

- ☐ Very positive
☐ Positive
☐ None
☐ Negative
☐ Very negative

- ☐ Don't know
- ☐ Prefer not to say

No free-text box for explanation

Question 53: Which, if any, of the reforms described in this Call for Evidence, in your view, pose public safety or crime concerns?

- ☐ **National Licensing Policy Framework** (only one option could be selected in the online survey)
- ☐ Licensing Condition Amnesty
- ☐ Remove Newspaper Advertising Requirement
- ☐ Outdoor Trading and Pavement Licences
- ☐ Increase TENs Entitlement
- ☐ Sunset Clause on Blanket Hours
- ☐ Arbitration, Evidence and Data Protocol
- ☐ Festivals and Events
- ☐ Licensing Agent of Change Principle
- ☐ None
- ☐ Don't know
- ☐ Prefer not to say

Explanation:

We are concerned that moving the sole focus of our country's licensing objectives away from protecting the public would dilute the weight that concerns around crime and disorder, including domestic abuse crime, can carry in licensing decisions, thereby risking public safety and increases in alcohol-related crime.

Although alcohol alone is not considered to be a cause of domestic abuse, there are many ways in which alcohol and domestic abuse are related. Local Police records in our region indicate that alcohol consumption was one of the main vulnerabilities associated with domestic abuse crime across North Yorkshire, recorded in 30% of domestic abuse cases³, which tallies with national records but is likely to be an underestimate of the involvement in alcohol in domestic abuse crimes due to varied recording methods. The reporting of domestic abuse incidents increases around the time of major sporting events; an increase in alcohol consumption have been one of the factors linked to this.

Please note the survey was structured that we could only select one option rather than all of the aspects that we are concerned by.

Question 54: In your view what impact will the proposals for reform included in this Call for Evidence have on public health?

- ☐ Very Positive
- ☐ Positive

³ North Yorkshire Police Operational Problem Profile Domestic Abuse 2024 Annual Report, supplied to City of York Council Public Health

- ☐ None
- ☐ Negative
- ☒ **Very Negative**
- ☐ Don't Know
- ☐ Prefer not to say

No free-text box for explanation

Question 55: Which, if any, of the reforms described in this Call for Evidence, in your view, pose public health concerns?

- ☒ **National Licensing Policy Framework**
- ☒ **Licensing Condition Amnesty**
- ☐ Remove Newspaper Advertising Requirement
- ☒ **Outdoor Trading and Pavement Licences**
- ☒ **Increase TENs Entitlement**
- ☒ **Sunset Clause on Blanket Hours**
- ☒ **Arbitration, Evidence and Data Protocol**
- ☒ **Festivals and Events**
- ☐ Licensing Agent of Change Principle
- ☐ None
- ☐ Don't know
- ☐ Prefer not to say

Explanation:

Local communities should have the power to shape their own neighbourhoods

It should be up to communities to decide whether or not they want a new outlet for alcohol in their neighbourhood. The National Licensing Policy Framework proposals include adding an 'economic development' licensing objective and instating a requirement that licensing decisions are 'necessary and proportionate' to promoting licensing objectives. Moving the sole focus of our country's licensing objectives away from protecting the public would mean local residents' voices would carry less weight. This means that companies could sell alcohol in more places or for more of the time even if the majority of local people don't want that to happen.

Any change to the core purpose of licensing deserves proper scrutiny of legislative reform

The core purpose of licensing is to create guardrails for public protection in relation to products or services which can be harmful or present risks to our society. However, the Taskforce and proposed licensing reforms seek to fundamentally change the purpose of licensing without the scrutiny of full legislative reform. We are concerned that moving the sole focus of our country's licensing objectives away from protecting the public would dilute the weight that concerns for protection of the public, including children, would

carry in licensing decisions. Such a move in a democratic society deserves full scrutiny through our legislative processes.

The government is uniquely placed to set high standards for business in support of a flourishing society

Businesses that make, promote and sell alcohol play a major role in shaping our environments and how much harm alcohol causes across our society and economy. Without strong mechanisms to direct their activity, many companies will choose to market alcohol aggressively and divert public attention from the influence they have over our available options and the way people think about alcohol. Businesses that want to work in ways that are better for health have to go against the grain. The government is uniquely placed to set high standards in favour of business practices that support healthy lives, ultimately to create better environments for us to live, work and socialise and our children to grow up in, and an economically strong society.

Introducing an additional framework that takes the focus away from protecting the public and makes it more difficult for local areas to determine where, when and how alcohol is sold, is ultimately a risk to public health because the availability of alcohol is a key driver of alcohol-related harms in our communities and across our country. As well as creating price competition, widespread availability of alcohol in new places and at new times is pragmatically a significant source of normalisation and consumption. Together these things increase alcohol-related harms as wide-ranging as poor performance in the workplace due to poor sleep quality to people dying before their time from conditions caused wholly or in part due to alcohol.

Question 56: In reforming the licensing system to promote economic benefits, what measures can be taken to promote public health?

Include public health as a licensing objective alongside other effective population-level policies to reduce alcohol-related harm

To follow through on commitments to reduce alcohol-related harms, the Government must embed concern for public health in our licensing system and implement other population-level policies such as duties aligned with inflation, comprehensive advertising restrictions and introducing a minimum price per unit of alcohol, which will be more effective than initiatives focused on changing individual behaviour when alcohol companies put alcohol constantly in the spotlight in our neighbourhoods and on our screens.⁴ Public health should also be included as a licensing objective in legislation to better enable Directors of Public Health to fulfil their responsibility to protect the health and wellbeing of the population in their area.

Businesses that make, promote and sell alcohol play a major role in shaping our environments and how much harm alcohol causes across our society and economy. Without strong mechanisms to direct their activity, many companies will choose to

⁴ World Health Organisation (2024) [Tackling NCDs: best buys and other recommended interventions for the prevention and control of noncommunicable diseases, second edition](#)

market alcohol aggressively and divert public attention from the influence they have over our available options and the way people think about alcohol. Businesses that want to work in ways that are better for health have to go against the grain. The government is uniquely placed to set high standards in favour of business practices that support healthy lives, ultimately to create better environments for us to live, work and socialise and our children to grow up in, and a more economically strong society.

The UK public are supportive of such an approach. Recent nationally representative polling of over 2,000 adults (Feb-Mar 2025) shows that people want a level playing field when it comes to the choices they make about their own health. The public does not appear to see individual responsibility and support for government regulation as being in conflict with each other: 74% believe individuals are responsible for their health, but 70% also think the government should make healthy living easier and 73% believe it should protect people from harmful business practices.⁵ Separate polling (Nov 2024) also clearly demonstrates there is more support than opposition for population-level policies that would reduce alcohol-related harm, including minimum unit pricing and the banning of marketing of alcohol at sporting events.⁶

Acknowledge the inherent conflicts of interest of the alcohol industry and exclude from public policy development

There is an inherent conflict of interest for companies who derive significant proportions of their profits from alcohol production and sales, and public health. Analysis has revealed that alcohol sales revenues appear to be highly dependent on alcohol consumption at levels that pose a serious risk to health and wellbeing.⁷

Policymaking must therefore be protected from the vested interest of alcohol industry stakeholders so that public interests can be consistently prioritised. Evidence of harm from industry involvement in policy-making has been documented, including examples of delaying the introduction of effective policy measures and propagating industry-favourable narratives.^{8,9}

We are therefore concerned that in the absence of transparency about how conflicts of interest are managed, industry leadership in licensing reforms could pose a risk to public health through the weakening and delay of effective population-level interventions.

Strong conflicts of interest protections need to be developed. Unhealthy commodity industry representatives should not direct policy development. There is a toolkit available

⁵ <https://www.publicfirst.co.uk/new-polling-for-action-on-smoking-and-health.html>

⁶ <https://www.health.org.uk/features-and-opinion/features/what-action-does-the-public-think-the-government-should-take-on>

⁷ Bhattacharya, A. *et al.* (2018) [How dependent is the alcohol industry on heavy drinking in England?](#)

⁸ McCambridge J, Hawkins B, Holden C (2013) Industry Use of Evidence to Influence Alcohol Policy: A Case Study of Submissions to the 2008 Scottish Government Consultation. [PLoS Med 10\(4\): e1001431](#)

⁹ Hawkins & McCambridge (2020) 'Tied up in a legal mess': The alcohol industry's use of litigation to oppose minimum alcohol pricing in Scotland. [Scottish Affairs 29:1](#)

to guide the production of such policies, which is recommended by the World Health Organisation.^{10,11}

Question 57: Does this call for evidence raise any equalities concerns such as disproportionate impacts on particular demographic groups?

- ☒ Yes
- ☐ No
- ☐ Don't Know
- ☐ Prefer not to say

Explanation:

Increasing alcohol availability will harm our poorest neighbourhoods the most

Anything that increases alcohol availability increases alcohol-related harms and is therefore a significant equalities concern because although alcohol-related harms are seen across society, they disproportionately affect people living in poorer neighbourhoods. In what has been termed the ‘alcohol paradox’, people who live in poorer areas who drink the same or lower levels of alcohol experience greater alcohol-related harm than people living in more affluent areas; this is particularly true for mortality from chronic liver disease.¹²

Furthermore, health harms from unhealthy commodity industry products are much higher when risk factors (such as high alcohol consumption with obesity or tobacco use) are combined, which is more common in disadvantaged groups^{13,14}. It therefore follows that the proposed changes will further harm people who are already the most disadvantaged and fighting hardest against environments that are most challenging to good health.

The government must conduct a full health and equalities impact assessment

To fully understand the implications of the proposed policy changes, the government should conduct a full independent health and equalities impact assessment and make the findings publicly available.

The government should implement policy reforms known to impact positively on equalities

In addition, we urge the government to implement licensing and wider policy reforms that will positively - rather than negatively - impact on equalities; as well as embedding public health as a licensing objective, the government should implement the success in

¹⁰ Good Governance Toolkit – Brook and Körner (2024) is available at:

<https://www.adph.org.uk/resources/good-governance-toolkit/>

¹¹ WHO (2024) Commercial Determinants of Noncommunicable Diseases in the WHO European Region. Available at: <https://iris.who.int/handle/10665/376957>

¹² PHE (2018) The Public Health Burden of Alcohol and the Effectiveness and Cost-Effectiveness of Alcohol Control Policies

¹³ <https://journals.plos.org/plosmedicine/article?id=10.1371/journal.pmed.0050012>

¹⁴ <https://ash.org.uk/resources/view/holding-us-back-tobacco-alcohol-and-unhealthy-food-and-drink>

reducing alcohol harm and associated inequalities without impacting industry performance in Scotland through introducing minimum unit pricing in England.^{15,16}

¹⁵ Frontier Economics (2023) [Minimum Unit Pricing: Impacts on the alcoholic drinks industry in Scotland](#)

¹⁶ SHAAP (2024) [Efficacy of Minimum Unit Pricing \(MUP\)](#)