



**The Response of CARDAS to the
Scottish Government Consultation:
Changing Scotland's Relationship
with Alcohol**

August 2008

submission

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INTRODUCTION

CARDAS

The Coalition Against Raising the Drinking Age in Scotland (CARDAS) is a coalition of local and national youth and student representative organisations in Scotland. We aim to provide a youth and student perspective on the Scottish Government's strategic approach to tackling alcohol misuse.

Our membership includes NUS Scotland, the Scottish Youth Parliament, NUSSL, and Northern Services, along with a broad range of local student representative organisations from across Scotland.

See *Annex D – Full list of CARDAS members* for our full membership list

Support for the consultation

We fully support the Scottish Government's ambition to tackle alcohol misuse and alcohol-related problems in order to create a healthier, wealthier, safer and more successful Scotland. The cost of alcohol misuse to our country is clear, and our actions must be tough and radical to meet the challenge and tackle the heart of the problem.

In releasing this strategy the Scottish Government have opened up a wide-ranging debate that has engaged people of all ages, backgrounds, and from all communities and places across Scotland, to think seriously about how we can free ourselves of a burden that is 'undermining our potential as individuals, families, communities, and as a country'.

Alcohol misuse affects the lives of everyone in Scotland, and we all have a part to play in changing Scotland's relationship with alcohol by challenging current unhealthy societal attitudes towards misuse; and developing a positive drinking culture in the long term. Whilst, in the short term we need to implement measures to prevent misuse and reduce alcohol-related problems in the here and now.

We support a combination approach of working towards the long-term objective of changing the drinking culture, whilst introducing measures to educate the public, tackle the irresponsible promotion of alcohol, better enforce current laws, and seeking to take some of the weight of the financial burden off of the taxpayer. We aim to support these goals with the measures we have laid out in this consultation response.

We do not agree with every proposal that the Scottish Government have put forward, most notably the proposal to raise the minimum purchase age for off-sales alcohol purchases from 18 to 21, which we believe is at best ineffective, and at worst counterproductive – and a clear infringement on the rights of responsible adults.

But we do welcome the fact that the Scottish Government are thinking radically about how we tackle alcohol misuse as a country, and we believe it is right to put ideas out in a public forum for debate and discussion, as long as the Scottish Government follow through on their pledge to be a government that truly listens.

We hope that this partnership approach continues in the implementation of any proposals taken forward, and know that our youth and student communities want to continue to engage fully in efforts to tackle alcohol misuse in Scotland.

CONSULTATION RESPONSE

Section 1 - Reduced Consumption

Irresponsible promotions and below-cost selling

Proposals on which the Scottish Government invites views:

- We invite views on whether regulations should be made under the Licensing (Scotland) Act 2005, to:
 - a) Put an end to off-sales premises supplying alcohol free of charge on the purchase of one or more of the product, or of any other product, whether alcohol or not.
 - b) Put an end to off-sales premises supplying alcohol at a reduced price on the purchase of one or more of the product, or of any other product, whether alcohol or not.
 - c) Prevent the sale of alcohol as a loss-leader

Also, that these measures should, subject to Parliamentary agreement, take effect from 1 September 2009 as conditions of the premises license. A breach of the conditions would result in action being taken by the Licensing Board and could result in a license being suspended for

CARDAS summary response

- CARDAS supports proposals to prevent the sale of alcohol as a loss leader, and end promotions offering free alcohol or quantity discount for bulk buying.

CARDAS believes that discounting of alcohol through bulk buying encourages people to buy and consume more alcohol than they might have otherwise intended – leading to alcohol-related harm.

Further, the lack of any minimum pricing scheme combined with the lack of regulations against selling alcohol as a loss leader and giving quantity discounts, has meant that retailers across the on and off trade have engaged in a price war to entice customers, which has inevitably led to irresponsibly low pricing.

We welcomed the measures introduced with the Licensing (Scotland) Act 2005 to clamp down on irresponsible promotions on licensed premises, as outlined in the consultation document. This effectively prevents irresponsible promotions in the on-trade that encourage people to drink more than they might have otherwise intended, like 'happy hours' or quantity discount for bulk buying.

We would like to see the spirit of these measures extended to off sales, including regulations introduced to curb the sale of alcohol as a loss leader, and to end promotions offering free alcohol or quantity discount for bulk buying. We support the Scottish Government in pursuing these ends.

Minimum retail pricing

Proposals on which the Scottish Government invites views:

- We invite views on the proposed principles on which a minimum pricing scheme for alcohol products should be established.

CARDAS summary response

- CARDAS supports the introduction of a minimum pricing scheme for alcohol products across the on and off trade based on alcoholic strength.
- CARDAS believes a minimum price of 35 pence per unit would be sufficient to eradicate irresponsible pricing but not so high as to unfairly penalise responsible drinkers on lower incomes.
- When implemented the Scottish Government must monitor the effects of the policy, show through clear evidence whether or not it is working, and review the continuation of minimum pricing based upon recognition of its impact.

CARDAS agrees with the introduction of a minimum pricing scheme for alcohol products based on the following principles:

- a) The minimum price of an alcoholic product should be based on its alcoholic strength

CARDAS agrees that there is evidence, as outlined in the consultation document¹, to suggest that cheaper alcohol leads to increased consumption. Estimates by the Academy of Medical Sciences suggest a 10% rise in alcohol price would save the lives of 479 Scottish men and 265 women every year.²

We believe a minimum pricing scheme directly linking product strength to retail price could be beneficial in reducing demand and consumption.

CARDAS is concerned with the ever increasing strength of alcohol products, which we feel encourages increased consumption of alcohol unknowingly. We believe that any form of minimum pricing should reflect the potential harm that the drink could cause to the individual in terms of health and risk-taking behaviour. Therefore any minimum price should be based on alcohol strength. We hope that introducing minimum pricing may incentivise producers to develop lower strength products.

- b) The minimum prices should apply equally to all premises selling alcohol across the on and off trade

Minimum pricing needs to be introduced equally across the on and off trade so as to ensure irresponsible pricing is irradiated wherever it is in place.

- c) The minimum price should be high enough to tackle irresponsible pricing, but not so high as to unfairly penalise responsible drinkers on lower incomes

Whilst we understand any form of minimum pricing is likely to affect those on lower incomes, and realise that this is part of the point of the scheme, we feel that such a move should be focused on eliminating irresponsibly cheap pricing rather than raising the price of all alcohol to a level that would seriously affect responsible drinkers that happen to be on a lower income e.g. pensioners, low income families and those on student support.

We believe a figure of around 35p per unit would eliminate irresponsible pricing of problem products such as cider, cheap wine, and own-brand spirits, whilst not penalising those who drink responsibly on a lower income. For instance, a 2 litre bottle of cider at 5.3%abv would cost a minimum of £3.71 compared to an average current cost of approximately £2.80, while a 70cl bottle of spirits at 40%abv would cost a minimum of £9.80 which would force an increase in particular supermarket own brand products.

- d) The Scottish Government must show evidence that minimum pricing is working

The introduction of minimum retail pricing will be seen by many as a move that penalises responsible drinkers and could damage business and the Scottish economy.

Retailers have put forward reasonable arguments against the introduction of minimum pricing;

- That there is insufficient evidence of a clear link between price, consumption and misuse
- That irresponsible attitudes towards alcohol are the problem, and not affordability
- That it is wrong to prevent those on low incomes from purchasing alcohol due to artificially inflated prices
- That it is not in the interest of the consumer, and might be against competition law, for the Scottish Government to intervene in the market in this way
- That is unclear what results the Scottish Government are seeking to achieve from such a move i.e. what will success look like? And conversely what will be deemed unsuccessful? How will this be measured and monitored?

Whilst we support the Scottish Government in introducing minimum pricing based on the above principles, we also believe that it is only right that the Scottish Government prove that it is a policy that is working, when implemented, to significantly reduce alcohol misuse and harm. We call upon the Scottish Government to monitor the effects of minimum pricing on alcohol misuse, and provide clear

evidence as to whether or not it is working. We believe the Scottish Government should seek to regularly review the continuation of the policy in light of its impact.

Promoting choice in standard measures of alcohol

CARDAS summary response

- CARDAS supports the introduction of smaller standard measures of wine at 125ml and spirits at 25ml
- CARDAS calls for mandatory and clear unit information to be presented on drinks menus

CARDAS fully supports the introduction of legislation to require licensed premises to automatically sell standard measures of wine at 125ml and spirits at 25ml, unless the customer specifically asks for a larger measure.

We are particularly concerned that through irresponsible promotions and an increase in the measures and strength of alcoholic products, such as wine, people are being encouraged to buy and consume more alcohol than they might have otherwise intended when going to a licensed premise. This can lead to excessive consumption and under-estimation on the number of units being consumed – a particular concern for drivers.

As outlined in the consultation document, a standard measure glass of wine used to be 125ml, but wine is increasingly being served at 175ml as standard and 250ml as large, with some retailers no longer even offering a 125ml glass option. On top of this the average strength of wine is now 12-14%abv with beer and lager often at 5%abv.

CARDAS believes that offering a lesser measure as standard will make people more aware of how much they are drinking and will hopefully encourage people to consume less. We would also like to see licensed premises offering a greater range of soft drinks and low alcohol alternatives, to give consumers more choice.

CARDAS support's Alcohol Focus Scotland's call for the on-trade to have unit information on drinks menus including wine lists; enabling people to see precisely how many units they are consuming.

Section 2 – Supporting Families and Communities

Information for parents

CARDAS summary response

- CARDAS welcomes the focus on parents and carers and encourages the Scottish government to offer improved advice and support in teaching children about responsible drinking through what we say and do.

CARDAS welcomes a focus on parents and carers - who we believe are crucial to changing the culture of drinking in Scotland, by ensuring that young people are introduced to alcohol responsibly in a safe and controlled family environment.

We would like to see parents and carers offered advice and support on introducing young people to alcohol responsibly, and teaching children about the effects of alcohol and alcohol misuse. This could include freely available literature and targeted publicity campaigns, as well as input into alcohol education at school, and the inclusion of alcohol issues in national parenting projects.

CARDAS believes that parents and carers should encourage their children to drink responsibly from their early teenage years by setting a good example of responsible drinking and by occasionally offering teenagers a glass of wine or beer with meals so as to encourage better drinking practices.

Alcohol Education

Proposals on which the Scottish Government invites views:

- Whilst the Scottish Government is not explicitly inviting views on substance misuse education in schools, CARDAS would like to input our views on the proposals outlined.

CARDAS summary response:

- CARDAS calls on the Scottish Government to set a mandatory standard of alcohol education in schools and introduce quality controls to ensure effective delivery

CARDAS believes that schools have a valuable role to play in providing young people with the information they need to drink responsibly. We fully support the principle that young people must have access to reliable information about alcohol, alcohol misuse and its effects.

We call upon the Scottish Government to establish and ensure an adequate and mandatory level of alcohol education across schools in the context of *Curriculum for Excellence* as a crucial part of any strategy to change Scotland's relationship with alcohol. Whilst many schools have some level of education concerning alcohol we believe that the quality and consistency of this education is patchy at best. CARDAS calls upon the Scottish Government to introduce quality controls to ensure alcohol education is delivered effectively and consistently.

CARDAS does not believe that the focus of alcohol education should purely concern the dangers of alcohol misuse. We dislike the notion of 'substance misuse education'. Whilst we think this is an important component, we would also like education to focus on how to drink responsibly, why some people abstain from drinking, and information about the general effects and health effects so young people know what alcohol does to you and how it does it,

We also believe that the form of the teaching is vital – lecturing pupils and demonising alcohol is unlikely to prove beneficial to tackling alcohol misuse and could create a counter-productive reaction. Consideration should be given to using the wealth of expertise on alcohol available across Scotland to support alcohol education in schools by introducing the services of alcohol industry experts, health professionals, voluntary and community workers with expert knowledge in alcohol issues to be invited into schools to assist teachers with alcohol education.

Alcohol education should begin from an early age and continue throughout schooling to maximise impact and avoid irresponsible attitudes towards alcohol from having already been established and

embedded at the commencement of alcohol education. This could initially involve more subtle and appropriate means of introducing alcohol issues to younger children at a Primary level through educational books such as *Rory*. An exploration of alcohol issues would then be reinforced throughout later schooling.

Alternatives to alcohol

Proposals on which the Scottish Government invites views:

- Whilst the Scottish Government is not explicitly inviting views on alternatives to alcohol, CARDAS would like to input our views on the proposals outlined.

CARDAS summary response:

- CARDAS calls on the Scottish Government and Local Authorities to deliver and develop alternative activities for young people to prevent alcohol misuse

CARDAS believes that supplying alternatives to alcohol for young people is vital to tackling underage drinking and unhealthy alcohol consumption patterns, and that a lack of other things to do is often a major contributing factor to alcohol misuse and anti-social behaviour.

When you consider most towns across Scotland the facilities available to young people – and people of all ages – are often either underwhelming or focussed around consuming alcohol. Clubs, bars, and pubs, are a mainstay of Scottish entertainment, and even many other facilities such as cinemas and bowling complexes now often have bars. It is therefore not surprising that young people turn to alcohol for entertainment, especially when it is a main focus of entertainment for adults. Furthermore, because underage people cannot drink in bars, pubs or clubs, they turn to parks, the streets, and other more dangerous places, increasing the risk of harm and alcohol related problems.

CARDAS believes that it is unreasonable to expect young people not to misuse alcohol and to hang around on the streets and in parks when there is very little else for them to do in some communities.

We support current models of good practice in the community such as the Fife Bluelight scheme, the Pulse Initiative, the Moray Council Midnight Football League, and the work done by Scottish Sport Futures, as well as student-led initiatives like Children's Holiday Venture. We call upon the Scottish Government and Local Authorities to play their part in generating and supporting these targeted initiatives, alongside the development of more general facilities and events such as alcohol-free youth cafes, club nights, youth clubs, sports facilities and youth activities programmes. We would also like to see more opportunities for young people to take part in programmes and activities that enable them to gain skills and undertake personal development. Most importantly, we believe that young people need to be consulted on the sorts of activities and facilities they would like to see made available in their area.

Finally, CARDAS fully supports moves to stimulate young people to remain in education, employment or training post-school, which we believe is not only vital to the success of Scotland and the self

esteem of the individual, but will also help tackle alcohol misuse spurred on by lack of self esteem and social deprivation.

Raising the minimum purchase age

CARDAS summary response

- CARDAS strongly believes that the minimum age for off-sales alcohol purchases should not be raised from 18 to 21 in Scotland, and urges the Scottish Government to drop this proposal.
- CARDAS calls on the Scottish Government to put an end to all current schemes – and prevent any such future schemes - that discriminate against anyone who is above the current minimum age for alcohol purchases in the provision of goods, facilities and services on the grounds of their age.

CARDAS strongly believes that the minimum age for off-sales alcohol purchases should not be raised from 18 to 21 in Scotland, and urges the Scottish Government to drop this proposal.

In this section of the consultation response we will outline the following:

- a) That raising the minimum purchase age would not be beneficial to tackling alcohol misuse or alcohol-related problems in Scotland
 - b) That raising the minimum purchase age is likely to prove counterproductive and actually worsen alcohol misuse and alcohol-related problems in Scotland
 - c) That raising the minimum purchase age contributes to the demonization of young people, and infringes on the rights and responsibilities of young adults, in contradiction with the age of majority.
 - d) That public opinion is against raising the minimum purchase age
- 1) **The case has not been made for raising the minimum purchase age**

CARDAS does not believe that a sufficient case has been made for raising the minimum off-sales alcohol purchase age from 18 to 21. Whilst we agree that alcohol misuse is clearly a significant problem in Scotland, we do not see how raising the minimum purchase age will help to tackle what is fundamentally a cultural problem concerning our societal attitudes towards drinking alcohol. Alcohol misuse and alcohol-related problems are not rooted in a particular age group, as the Cabinet Secretary for Health and Wellbeing, Nicola Sturgeon argues, it is a problem that affects *“people across all sections of society, of all ages”*³

In the consultation document it is argued that the primary purpose of raising the minimum purchase age would be to *“reduce alcohol-related harm amongst the 18-21 age group”*⁴ *“reduce excessive consumption among young people”*⁵, and *“generally reduce the amount of alcohol purchased by young people”*⁶, with a secondary purpose to *“reduce access to alcohol by under 18s.”*⁷ It is also implied that such a move is intended to delay the onset of drinking, reduce the opportunity for those

aged under 18 to purchase alcohol by proxy through 18 to 21 year olds, and encourage drinking among 18 to 21 year olds in more 'controlled', 'moderated' and supervised settings.⁸

Whilst we believe these are laudable goals, we do not accept the premise that raising the minimum purchase age will reduce alcohol misuse⁹, alcohol-related problems¹⁰, or access to alcohol by under 18s. Instead we believe that the evidence suggests that raising the minimum purchase age is likely to be counterproductive; worsening alcohol misuse and alcohol-related problems, with no significant affect on access to alcohol by under-18s.

CARDAS does not agree that the evidence-base laid out in the consultation document is particularly strong or that it supports the case for raising the minimum purchase age, and would highlight that much of the evidence used actually backs the case for keeping the minimum purchase age at 18 when examined at in any detail.

The Armadale under-21 alcohol ban

CARDAS believes the evidence shows that the six-week Armadale trial ban on under-21s purchasing alcohol in off-sales was relatively unsuccessful, and given this and the number of variables affecting the results of the trial, we believe that it is unreasonable for the Scottish Government to use the trial or similar trials to support a case for raising the minimum purchase age across Scotland. If anything we believe that the results of the trial prove it is not worth pursuing the proposal to increase the minimum purchase age.

See *Annex A – The Armadale under-21 alcohol ban* for our full analysis of the Armadale trial.

CARDAS is also concerned that the sole focus of the Armadale trial ban appeared to be on alcohol-related crime and anti-social behaviour, rather than tackling alcohol-misuse and alcohol-related harm and health effects.

We believe that concerns about anti-social behaviour should be focused on targeting the root causes of this behaviour – which we do not believe is purely alcohol-related. This is evident by the very fact that it is only a minority of those who drink alcohol and get intoxicated that engage in these sorts of behaviours. Most 18 to 21 year olds do not take part in criminal acts, engage in violence, vandalism or other anti-social acts even if they do drink to excess and get 'drunk'.

We believe that alcohol can relax people's inhibitions and fuel anti-social behaviour patterns, but crucially only those largely already present. For these reasons we believe that anti-social behaviour is often the sign of a more deep-rooted problem than simply drinking irresponsibly.

CARDAS calls upon the Scottish Government to look into the root causes of violent, criminal and other anti-social behaviour – rather than changing the minimum purchase age which we believe is unlikely to be a long-term solution. Given the results of the Armadale trial and the conclusions drawn

by Lothian and Borders police into the trial, we do not even accept that raising the minimum purchase age would act as an effective short-term barrier.

Evidence from other countries

CARDAS does not accept the implication in the consultation document that the evidence from other countries supports the case for raising the minimum purchase age in Scotland.

We believe that the evidence from abroad suggests that raising the minimum purchase age does not tackle alcohol misuse, or alcohol-related problems. If anything the evidence shows that such a move is counterproductive to this cause, and creates a reactance effect encouraging and increasing irresponsible patterns of alcohol consumption among young people, such as binge drinking. This is perhaps why so few of the countries around the world have a minimum off-sales alcohol purchase age above 18, and why the vast majority have one of 18 or below. It would be odd if the Scottish Government were to pursue such a proposal against the grain of international evidence, and at a time when even states within the USA are actively pursuing proposals to reduce the purchase age to 18 because 21 has not worked.¹¹

See *Annex B – Evidence from other countries* for our analysis of the lessons that need to be learnt from other countries.

Delaying the onset of drinking

The consultation document points to suggestions that “*delaying the onset of drinking may also be important in reducing the risk of alcohol problems and dependence in later life*”¹² and outlines evidence that underage people are currently drinking regularly, irresponsibly and with the intention of getting drunk.

CARDAS agrees that irresponsible drinking by underage people is the cause of a significant number of alcohol problems and may increase the risk of problems and dependence in later life. However, we do not see that raising the minimum purchase age is a logical or sensible response to tackling underage drinking or attempting to delay the onset of drinking.

Raising the minimum purchase age in off-sales will not delay the onset of drinking for those aged 18 and over, who would still be able to drink in on-sales premises. Aside from which, studies have shown that there is no significant difference in rates of alcohol abuse between those who start drinking at 18, 19, 20 or 21.¹³ CARDAS therefore does not believe that it is necessary or desirable to delay the onset of drinking from 18 to 21, and thinks that this could be counterproductive to attempts to normalise responsible drinking.

More significantly, raising the minimum purchase age will not tackle drinking by those who are currently underage. CARDAS believes that we need to tackle underage drinking, and we have

outlined how we think this should be done in this consultation response, but creating a higher drinking age is not the solution, and it is only going to result in higher levels of underage drinking in Scotland if another age group are banned. Notably, In the USA raising the minimum purchase age did not prevent underage drinking and was counterproductive to the aims of the alcohol policy, in that it actually worsened alcohol misuse and alcohol-related problems.¹⁴

Few people think it is desirable for thirteen year olds to be intoxicated wandering the streets with bottles of cider – but it happens currently¹⁵. Indeed, as the consultation document highlights, in a study 40% of 15 year olds and 15% of 13 year olds reported drinking alcohol in the previous week.¹⁶ Whilst, the Edinburgh Study of Youth Transitions and Crime found of approximately 4,300 15 year olds involved, 84% admitted to drinking alcohol¹⁷ with 42% drinking at least once a week.¹⁸ The very fact that we have underage drinking suggests that we are not able to enforce existing laws, and that raising the off-sales purchase age to 21 is unlikely to prevent under 21s from getting hold of alcohol, anymore than a minimum purchase age of 18 currently prevents under 18s from doing so.

Rather than creating new laws to increase the minimum purchase age we believe that the current purchase age should be enforced, and that other measures to change the drinking culture and reduce alcohol-related problems – as outlined in this consultation response – should be implemented instead.

Reducing the opportunity for those aged under 18 to purchase alcohol by proxy through 18-21 year olds

In the consultation document it is suggested that raising the minimum purchase age will “*reduce the opportunity for those aged under 18 to purchase alcohol by proxy through 18-21 year olds.*”¹⁹

CARDAS agrees that the move may well reduce the number of 18 to 21 year olds purchasing alcohol on behalf of persons under 18. However, we believe that this is the same kind of logic that would suggest locking everyone up in jail is a good means of preventing crime. It might do the job, but is it a fair way to solve the problem?

In our experience it is often parents, carers and relatives over the age of 21 that purchase alcohol for underage persons. We believe that 18 to 21 year olds are unlikely to be associating with young teenagers, and are even less likely to be acting as agents for them. This will of course happen in some instances, but it is a minority occurrence, and it does not make sense to restrict the rights of the sensible majority for the actions of an irresponsible minority. Rather we should be seeking to enforce the current law and clamp down on proxy sales for underage people.

Encouraging 18 to 21 year olds to drink in ‘controlled’ ‘moderated’ and supervised conditions

In the consultation document it is claimed that “*on-sales premises offer a more controlled drinking environment than off-sales, therefore, the behaviour of 18-21 year olds is more likely to be moderated. Also unsupervised settings are associated with increased drunkenness and risk of harm amongst underage drinkers.*”²⁰

CARDAS agrees that responsible drinking should be introduced under supervision at a young age, ideally in a family setting with positive role-models. For instance, we believe that parents and carers should be allowed to give their older teenage children a glass of wine or beer at dinner – thus encouraging responsible drinking and setting a good example.

However, at the age of 18 you are an adult and can think for yourself. Most young adults drink responsibly, and to suggest that adults require supervision when drinking veers on the side of patronising, especially when you consider all of the other serious and significant things you are responsible for deciding and expected to do at the age of 18.

Some might argue that young people do drink in dangerous situations, and that raising the off-sales purchase age would allow 18 to 21 year olds to drink in a safer environment such as pubs, bars and clubs. However, CARDAS would argue that the majority of 18 to 21 year olds are unlikely to be drinking in dangerous situations such as outside on the streets, in parks, near railway lines and so on. We believe that this is more of an issue for those under the age of 18 who cannot legally go to pubs and clubs – and if they choose to drink – are forced to drink in these unsupervised and often unsafe areas.

It is also important to remember that not everyone wants to drink in a space dedicated to the consumption of alcohol. For instance, many young adults might choose to share a bottle of wine with their friends and family over dinner, or some bottles of beer whilst watching sport, or undertaking other activities at home.

2) **Age is not the issue – we need to change the drinking culture**

CARDAS disagrees with the focus on the minimum purchase age because we do not believe that it helps to tackle the root cause of Scotland's alcohol problem, which is fundamentally a broader cultural issue caused by our societal attitudes towards alcohol and alcohol misuse.

Fiddling around with the minimum purchase age will do nothing to change the drinking culture in Scotland, because alcohol misuse is not a problem that is age-specific as the consultation document notes, excessive consumption is *“not limited to particular sections of society but is common across different age and socio-economic groups.”*²¹

Over the past few decades alcohol misuse and related problems have got significantly worse. For instance, deaths directly related to alcohol have more than tripled over the past 25 years and consumption has increased by over 23% in the last 10 years.²² The minimum purchase age has however, remained consistent over this period, suggesting that alcohol problems have gotten worse for other reasons unconnected to the minimum purchase age.

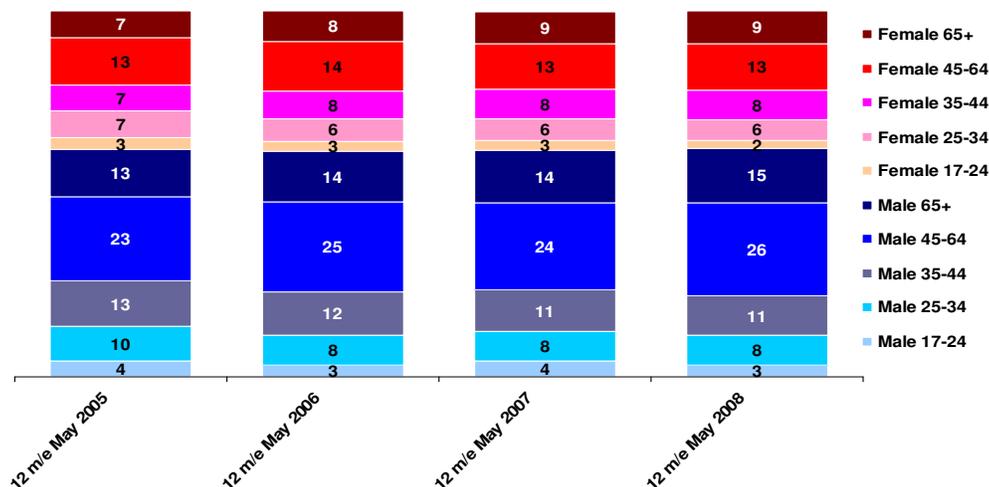
Furthermore, studies show that the notion of 18 to 21 year olds being the greatest consumers of alcohol is actually a misconception. See for instance, the TNS Worldpanel Alcohol Consumer Profile

of UK Shoppers²³ below, which shows that over the past four years 17 to 24 year old men account for only 3.5% of consumption and 17 to 24 year old women account for under 3%, while the age group consuming the most alcohol were those aged between 45 and 64.

Alcohol Consumer Profile (UK Shoppers)

Men account for the majority of alcohol consumption – especially 45+ year olds

Consumer Profiles – Drink %



tns worldpanel Data: TNS Worldpanel Usage – Total Consumption 12 m/e May 2008 © Worldpanel™ division of TNS 2008 14

Similarly, the latest ONS Omnibus Survey of UK adults' drinking behaviour and knowledge found that those most likely to have bought alcohol from a supermarket were people aged 25 or above, and those in managerial or professional occupations.²⁴

There is also a common misconception that 18 to 21 year olds are the age group doing the most alcohol related harm and causing the most alcohol related problems. An audit of fifteen mainland emergency departments over 10 days in October and November 2005 showed that the majority of alcohol related attendances were by men and women aged 20 to 29.²⁵

Criminalising 18 to 21 year olds won't change our ingrained societal attitudes towards drinking; it won't stop binge drinking, it won't stop 'drinking to get drunk', and it certainly won't stop underage drinking.

What we need to do is change our relationship with alcohol as a society, and challenge the cultural and social norms that are currently having a significant impact on our drinking behaviours.²⁶ It is not right that drinking to excess and public drunkenness are often viewed as acceptable in our society, and portrayed positively in books, magazines, television and film.

Evidence from abroad²⁷ shows that alcohol misuse and alcohol-related problems are not effectively tackled by raising the minimum purchase age, and that there is no clear link between the minimum purchase age and rates of alcohol misuse and alcohol-related problems, other than the evidence that shows when the minimum purchase age is increased irresponsible drinking gets worse.

3) Raising the purchase age could actually increase alcohol misuse and alcohol-related problems

A fundamental worry with any increase in the minimum off-sales purchase age is that it causes a reactance effect and turns alcohol into more of a forbidden fruit; increasing the desirability of alcohol amongst young people and worsening levels of alcohol misuse and alcohol-related problems, as it has done in the USA.²⁸

In any prohibition culture – even one specific to off-sales – we believe that alcohol tends to become a forbidden fruit; an iconic badge of rebellion against authority, and thus all the more appealing. The consumption of alcohol can be seen as a goal in itself.

More worryingly, prohibition can lead to the sorts of drinking patterns we want to avoid – episodic heavy drinking. Prohibition can destroy moderation, instead promoting great excess and abusive drinking, as people tend to consume alcohol in huge quantities on occasions when they can obtain it.

4) Raising the purchase age infringes on the rights of responsible adults

There is no given age at which people are automatically guaranteed to make sensible decisions about their lives and their actions, but, almost universally, by the age of 18 people are generally considered to be capable of thinking for themselves and making their own reasoned and responsible judgements.

CARDAS believes that it is disappointing that the Scottish Government believes that adults under 21 years old are not able to take responsibility for their own actions and enjoy alcohol sensibly in the privacy of their own homes

In Scotland, by the age of 18 you can vote and decide Scotland's future, get a job and pay taxes, get married and have children, join the army and fight on the front line, go to university and get a degree, own a car and drive, gamble and win a million pounds in the lottery, serve on a jury and agree a legally binding contract, obtain a pilot's licence and fly an aircraft, own a business and be an employer, undertake a sport professionally and represent your country in the Olympics, take out a mortgage and buy a house, own a personal license²⁹ and authorise the sale of alcohol, buy fireworks and smoke, get a tattoo and have piercings, join the police and get a promotion, and make many other serious and responsible decisions about your life, your actions, and your role as a citizen in our country.

If the Scottish Government were to raise the minimum off-sales alcohol purchase age to 21, then you would still be deemed responsible enough to do all of the above at 18, but you wouldn't be able to

make a decision about whether or not you buy a bottle of wine to share with your family over a quiet dinner at home, or some bottles of lager to drink with your friends whilst watching sport.

If the Scottish Government does not believe that 18 year olds are capable of making sensible decisions about purchasing and consuming alcohol from an off-sales premise then we seriously need to re-evaluate our standards for what is an acceptable level of decision-making for an 18 year old to be undertaking. It would be quite extraordinary for anyone to suggest that deciding to join the army and put your life on the line for your country required less capability to make sensible, reasoned and responsible decisions than deciding to buy a bottle of wine from a supermarket. Similarly, many of the other rights and responsibilities that you gain by the age of 18 arguably require a higher level of reason and responsibility than choosing to purchase and consume alcohol from a shop.

Perhaps most bizarrely, if the minimum purchase age were to be raised, at 18 you would be able to own a bar, have a personal license and authorise the sale of alcohol in your bar, but would not be able to purchase alcohol from an off-sales retailer.

The Scottish Government recently launched a campaign³⁰ to stamp out age-related discrimination urging Scots to look past the age and see the person, yet this proposal would specifically and deliberately discriminate against one group of adults on the basis of age. This comes at the same time as other minimum age restrictions appear to be in the process of being lowered – for instance, there is much support for a reduction in the voting age from 18 to 16, and proposals are underway that could reduce the age of becoming an MP from 21 to 18. This suggests that younger people are now more capable of making serious decisions rather than less capable as raising the purchase age implies.

CARDAS believes that the majority of young adults in Scotland are capable of drinking responsibly, and do not engage in drink fuelled anti-social behaviour, or supply alcohol to underage persons. We believe it is unreasonable for the Scottish Government to - by implication - suggest that a 21 year old is naturally more qualified to make sensible choices about drinking than an 18, 19 or 20 year old.

Furthermore, this choice of age seems completely arbitrary and would inevitably create confusion and a feeling of injustice when most other activities become legal at 18, if not before. The Scottish Government should consider whether it is necessary to punish a responsible majority of adults for the actions of a minority.

5) Public opinion is against raising the purchase age

Not only is raising the purchase age bad policy, but it is also a that is widely unpopular with the majority of Scots, and deeply unpopular with young adults in particular.

Through our campaign activity we have heard the views of thousands of Scots across the country, from Glasgow to Shetland, Dundee to Ayr. Scots of all ages have told us that they think the minimum

purchase age should remain at 18, but more significantly for the Scottish Government young people are especially passionate about protecting their rights and responsibilities.

Should this proposal be pursued, we do not doubt that young people across Scotland will send a message to the Scottish Government at the next Scottish Parliamentary elections, that they do not appreciate being patronised and they will not allow their rights being infringed upon.

As evidence of this we would cite the following examples:

- In an ongoing e-petition on the Scottish Parliament website³¹, as of the 27th August 2008, over 2100 people had signed the e-petition calling on the Scottish Parliament to urge the Scottish Government to *'drop its proposal to raise the age for off-sales alcohol purchases from 18 to 21'*.
- In a similar ongoing e-petition on the Scottish Parliament website³², as of the 25th August 2008 627 people had signed the e-petition calling on the Scottish Parliament to urge the Scottish Government to *'reconsider its plans to raise the age for off-sales alcohol purchases from 18 to 21'*.
- As of 21st August 2008, a protest group on the social networking website 'Facebook' called *'Don't raise the drinking age'*³³ - referring specifically to the Scottish Government proposal to raise the minimum purchase age - had 2,984 members.
- As of 21st August 2008, a similar protest group on the social networking website 'Facebook' called *'If they raise the drinking age to 21 in Scotland....I'm leaving'*³⁴ - had 1,050 members.
- In an ongoing poll on the Alcohol Focus Scotland website³⁵, of the 652 people who had responded as of 21st August 2008 to a poll question asking *'Should the purchase age of alcohol be raised to 21?'* a majority of 58% answered 'no' compared to a minority of 42% who answered 'yes'.
- In an ongoing poll on the BBC website³⁶, of the 26,896 people who had responded as of 21st August 2008 to a poll question asking *'Should the legal drinking age be raised to 21?'*, a majority of 53.10% answered 'no' compared to a minority of 44.27% who answered 'yes'.

In addition to these examples we also have a paper petition, with thousands of signatures from people of all ages and locations across Scotland, calling on the Scottish Parliament to urge the Scottish Government to *'reconsider its plans to raise the age for off-sales alcohol purchases from 18 to 21'*. This petition will be submitted by the 9th September 2008 for the Scottish Parliament Public Petitions Committee to consider.

It is interesting that the proposal to raise the minimum purchase age has received little public support even from alcohol-related charities such as Alcohol Focus Scotland, who state *"despite being quoted*

*in the press as calling for the legal drinking age to be raised to 21, Alcohol Focus Scotland believes that the current age of 18 is appropriate, but with stricter enforcement than we have at the moment.*³⁷

Similarly, Dr Maggie Watts, public health consultant and chairperson of the Ayrshire and Arran Alcohol and Drug Action team argues, *“Alcohol is a legal substance. What we need to do is make sure that people know how to use it safely. If you are able to get married at 16 or enlist to die for your country at 16, at what point do you say this is a toxic substance – you can’t have it?”*³⁸

Improving enforcement

Proposals on which the Scottish Government invites views:

- Whilst the Scottish Government is not explicitly inviting views on how we can improve the enforcement of the current minimum purchase age for alcohol, CARDAS would like to input our views on this matter.

CARDAS summary response

- CARDAS calls for the introduction of a mandatory Challenge 21 scheme to be introduced in all alcohol-selling premises as part of the conditions of license.
- CARDAS calls for the Scottish Government to facilitate the development of a national proof of age card that is recognised as appropriate proof of age identification in all licensed premises in Scotland – forming a recognised, forge-safe, alternative to carrying a passport or driver's license as ID.
- CARDAS calls for increased use of test purchasing and other such schemes to crack down on licensed premises that sell alcohol to anyone under the minimum purchase age.
- CARDAS calls for better publicised and enforced penalties for those licensed premises and individuals involved in selling to - and buying alcohol for – anyone under the minimum alcohol purchase age.
- CARDAS calls for measure to be introduced to clamp down on organisations promoting and organising irresponsible 'binge tours'

As is outlined in the consultation document the current minimum purchase age is not being enforced in a way that prevents underage purchase and consumption of alcohol.

CARDAS calls on the Scottish Government to implement the following five measures to tackle alcohol misuse and alcohol-related problems amongst young people:

Make challenge 21 mandatory

CARDAS believes that underage drinking and purchase of alcohol by underage persons would be limited if all alcohol retailers in the on and off trade were to implement a mandatory Challenge 21 scheme. The scheme is currently in operation by many retailers but there are many gaps, and we believe that this is allowing underage persons who look over 18 to purchase alcohol. In some cases we believe that a minority of irresponsible retailers knowingly sell to underage persons.

CARDAS is therefore calling on the Scottish Government to make the Challenge 21 scheme – or something similar – mandatory as a condition of license for all retailers. Whilst we realise that there is no clear definition of what someone looks like when they are 21 or over, we believe that the principal

of ID-ing anyone that a retailer believes to be or look under-21 would help eliminate many underage illegal purchases. The three year age buffer would also help to prevent those people who look 18 or over, but who are actually underage from purchasing.

Introduce a national proof of age card

CARDAS believes that effective enforcement of the existing minimum purchase age would be supported by the introduction of a Scotland-wide, nationally-recognised proof of age card, which would support the efforts of a mandatory Challenge 21 scheme.

This suggestion was included in the report of the Nicholson Committee which stated that the Scottish Government should '*arrange for the introduction of a national proof-of age card which would certify that the holder is of an age when he or she is entitled to purchase or to be supplied with alcoholic liquor in licensed premises. So far as is practicable that card should be incapable of forgery, and it should be readily available, free of charge, at various places such as post offices, universities, and the like. Licensees and their staff should be entitled to refuse to serve a young person who cannot produce that proof-of-age card, but as appropriate they should be entitled to rely on any other official document such as a passport*³⁹.

We do not believe that such a card should be mandatory for young adults to own or carry, but we do think that it offers the opportunity for young people to be able to easily identify their age in a forge-proof manner that doesn't involve carrying around an expensive passport or a driving license.

Many of the members of our coalition have policy against ID cards, and we would like to make it explicitly clear that we are not suggesting support for a mandatory ID card scheme or anything tantamount to such a scheme. We would only support a proof of age card that was voluntary and that carried only minimal and necessary data for the purpose of identifying a person's age. Similarly, we would only support such a scheme if any database of information relating to the scheme was kept to an absolute minimum if it is required at all.

We believe that the current system of on and off-trade outlets accepting a variety of proof of age cards is confusing to customers and retailers and can be subject to forgery. We would like a national proof of age card scheme to have the backing and support of the Scottish Government, and ideally to be the sole government-backed, nationally accepted form of ID for proof of age other than the passport or drivers license, in order to prevent confusion.

Increase use of test purchasing

CARDAS supports test purchasing schemes as an effective means of catching out the minority of retailers who do not follow acceptable procedures and sell alcohol to underage persons. Scottish Government statistics released in August 2008 showed that pubs and off-licences accused of selling drinks to underage people increased from 357 in 2006 to 810 last year⁴⁰. While the Edinburgh Study of Youth Transitions and Crime, found that 33% of the 4,300 young people aged around 15 involved reported purchasing alcohol underage from a small licensed grocer.⁴¹

We call on the Scottish Government and local police forces to continue the roll-out of test purchasing across Scotland and encourage firm action against any retailers who fail to meet their obligations to prevent sales to those persons who are underage.

We believe that responsible retailers are not opposed to test purchasing schemes – for instance, we are aware that the Scottish Grocers Federation support test purchasing schemes. It is only those who do not have appropriate procedures in place, and those who break the law, that need to be concerned. Strathclyde police recently announced figures showing almost a fifth of licensees in the Strathclyde area have been caught out selling alcohol to underage customers since they began their test purchasing rollout in December 2007. The 79 alcohol retailers caught out were fined between £400 and £500 each and a number had their license suspended for three months.⁴²

We also call on the Scottish Government to work with alcohol retailers across the on and off trade to improve internal test purchasing and mystery shopper schemes, and develop refusal register logs to help target problem hot spots.

Publicise and enforce penalties for underage purchasing

CARDAS welcomed the requirement in the Licensing (Scotland) Act 2005 that *“all premises must display a notice where alcohol is sold which sets out the offences relating to the purchase of alcohol by and /or for a person under the age of 18”*⁴³

Whilst we think this is a good first step we would like to see greater awareness of the penalties for selling to, and purchasing alcohol for underage persons. We believe there should be more publicity of these penalties in the media as well as in licensed premises.

We believe there is a perception in society that supplying alcohol to underage persons is acceptable. If we want to stamp out underage drinking then this perception needs to be changed.

Following the example of Lothian and Borders Police in West Lothian we would like to initiatives rolled out across Scotland that seek to clamp down on the purchase of alcohol for underage persons, such as intelligence-led operations like ‘Operation Realtime’ and deterrent operations like ‘Operation Floorsweep’⁴⁴.

Clamp down on ‘binge tours’

CARDAS calls on the Scottish Government to put in place measures to clamp down on the increasing trend of irresponsible ‘binge tours’ being organised and targeted at students and young people in Scotland.

For years the student population in Scotland have been unfairly labelled as binge-drinking ‘wasters’. We believe that the reality of life as a 21st century student in Scotland is very different to the

perception that has come from those who might have studied at a time when irresponsible drinking was more of an everyday reality in the student community.

CARDAS is not suggesting that students are somehow immune to the culture of binge-drinking and alcohol misuse that inflicts Scotland. There is clearly a problem amongst the student community as with most other communities in Scotland. However, things have significantly changed for the better.

Traditionally students' unions in Scotland have licensed bars, and the income from these bars is used to help run the union and provide student welfare and representation services. Students' Unions have a duty of care to provide services which are not detrimental to the health and safety of their members, and, therefore, unions are usually safe and welcoming places for students to enjoy a quiet drink. The old ways of promoting irresponsibly cheap drinks promotions, and binge-focused freshers' weeks have been shunned by responsible students' unions.

In 21st century Scotland more than ever before student life is about making the most of the wealth of extra-curricular opportunities available. Students' association's support this through increasingly diverse activities including hundreds of societies, charities and sporting activities.

However, a recent and growing trend has hit Scotland, where external organisations, usually based in England are organising and promoting 'binge tours' to students. Examples of such events and organisations include Student Night Out (sometimes referred to as Duck'd)⁴⁵ and Carnage.⁴⁶ Such events are often centred around selling t-shirts or tickets to large groups of students that enable them to get discounts on entry and alcohol on what we view as irresponsible pub crawls.

We are extremely concerned about the health and welfare of students that are targeted to attend such events, which we believe encourage binge drinking and go against any responsible drinking messages that are promoted by students unions and other bodies.

Whilst such 'binge tours' have been widely condemned by the student movement, and most students' unions have banned such promoters from campuses, there is little that the student movement can do to stop events going ahead or limit such activity further.

We believe that these kinds of events have a detrimental and damaging effect on the health, wealth and safety of students and only serve to further an irresponsible drinking culture in Scotland. CARDAS calls on the Scottish Government to implement measures to stop this growing trend in its tracks, and we offer our full support in doing this.

Social Responsibility Fee

Proposals on which the Scottish Government invites views:

- Whilst the Scottish Government is not explicitly inviting views on how we can improve the enforcement of the current minimum purchase age for alcohol, CARDAS would like to input our views on this matter.

CARDAS summary response

- CARDAS broadly supports the principle of a 'social responsibility fee', but with some reservations as to its implementation
- CARDAS believes that if a social responsibility fee is to be introduced:
 - 1) Any such fee must apply to all alcohol retailers across the on and off-trade, including, but not limited to, specific problematic premises
 - 2) That the fee levied should ideally be linked to alcohol by volume sold, or if this is not practical, by alcohol sales turnover
 - 3) That there should be a system of discounts and/or exemptions based upon positive contributions to the community/society
- Above all else CARDAS believes that it is the duty of the individual to consume alcohol responsibly, and that alcohol retailers and general taxation should not be responsible for shouldering the full financial burden to society. CARDAS therefore calls for measures to be implemented to ensure that those individuals who misuse alcohol and bring about associated costs to society - e.g. in policing and health resources - bear more of the financial burden.

CARDAS believes that everyone has an individual responsibility to drink responsibly and that retailers have a duty to sell responsibly.

We are seriously concerned that, according to the consultation document, the estimated cost to the taxpayer of dealing with alcohol misuse each year is £2.25 billion, or approximately £500 per adult in Scotland. Aside from the other negative effects on the health, safety and success of Scotland, the financial impact is significant enough to warrant tough action to tackle alcohol misuse.

We agree with the principle that the taxpayer should not bear the full financial burden of costs incurred through alcohol misuse, and broadly support the principle of a social responsibility fee, but with some reservations.

CARDAS believes that if the Scottish Government does introduce a social responsibility fee we need to be clear about why this is being done. It is not enough to say that this fee will go towards offsetting the cost of the effects of irresponsible selling if alcohol retailers that sell responsibly are still required

to pay it. By charging responsible alcohol retailers a fee we are saying that those who profit from the responsible sale of alcohol must still cover the costs of alcohol misuse on the basis that they are profiting from the sale of a legal substance that can cause harm when misused by individuals. This is essentially a tax on the selling of alcohol. Whilst we do not disagree with this policy per se, we believe it is important to recognise that this is not just about irresponsible selling, but rather all selling regardless.

It is also important to recognise that any such Social Responsibility Fee would be unlikely to cover the full costs of alcohol misuse in Scotland. If the estimated cost of alcohol misuse is £2.25 billion, and given that in December 2005 there were 17,187 liquor licences in force⁴⁷, each license holder would need to be charged around £145,500 to cover the full costs, which is clearly an unreasonable sum to charge. So, even if a social responsibility fee were to be introduced it is very likely that the taxpayer would still be carrying the overwhelming majority of the financial burden of alcohol misuse.

A social responsibility fee could however conceivably raise funds to go towards tackling some of the root causes of alcohol misuse such as social deprivation, providing alternatives to drinking for young people, and funding improved alcohol education or treatment. We would like to see any funds raised from a social responsibility fee ring-fenced to go to such projects that seek to tackle or treat alcohol misuse.

If a social responsibility fee to be introduced we believe it should be done on the following basis:

CARDAS believes that the fee should apply to all alcohol retailers across the on and off-trade, including, but not limited to, specific problematic premises. We feel that this would be the fairest and most effective system of contribution.

We think it right that any fee levied should ideally be linked to the volume of alcohol sold by the retailer as this is perhaps the fairest way of considering the contribution made to the alcohol problem by each retailer, by working on the principle of those who sell more alcohol, pay more. If this is not practical a system linked to alcohol sales turnover would at least work on the basis of those who profit more, pay more.

CARDAS believes that there should be a system of discounts and/or exemptions based upon positive contributions to the community/society. We would like to see some kind of recognition under such a scheme of discounts/exemptions for those alcohol retailers that actively promote responsible drinking and undertake responsible selling. For instance, many students' unions are involved in the Best Bar None scheme⁴⁸ aiming to improve the operations of licensed premises in order to reduce alcohol-related crime and disorder, and prevent the harmful effects of binge drinking. Other students' unions, have undertaken education and awareness-raising work targeted at students to discourage irresponsible drinking, for instance, Heriot Watt University Students' Association's (HWUSA) '*Boozy Betty*' campaign⁴⁹ which was backed by local drug and alcohol groups and received press attention recently⁵⁰

We would also like to see recognition for those retailers that promote alternatives to alcohol or useful community services such as the blue light discos in Fife, or the multitude of students' unions that offer non-alcohol orientated space for societies and sports groups, for example Edinburgh University Students' Association (EUSA) who use the profits and resources from their licensed premises to support over 200 social societies ranging from welfare support groups like Nightline to community work groups like Children's Holiday venture. These non-profit driven, non-alcohol centred activities provide an alternative to drinking, and offer beneficial activities and support to communities within Scotland such as children from deprived areas, LGBT students, mature students, religious groups and groups that further the aims of good causes such as fair trade, Amnesty International, Oxfam and others.

Finally, we would like to see measures implemented to ensure that those individuals who misuse alcohol and in doing so bring about associated costs to society - e.g. in policing and health resources - bear more of the financial burden. We believe that ultimately it is the individual's responsibility to drink responsibly and whilst we support the notion of a social responsibility fee, we feel there needs to be more emphasis on individual responsibility through fines and other means.

Section 3 – Positive Attitudes, Positive Choices

Continue to roll out targeted awareness-raising campaigns

Proposals on which the Scottish Government invites views:

- Whilst the Scottish Government is not explicitly inviting views on awareness raising campaigns, CARDAS would like to input our views on the proposals outlined.

CARDAS summary response

- CARDAS fully supports the continued roll-out of targeted awareness-raising campaigns and more general hard-hitting publicity campaigns
- CARDAS calls on the Scottish Government to provide funding for awareness raising measures delivered through youth and student organisations

CARDAS realises that education alone is not going to solve Scotland's alcohol problem⁵¹, however we believe that awareness raising campaigns can be useful in conjunction with a wider strategy. CARDAS supports alcohol awareness raising events such as the national alcohol awareness week and promotional materials that educate people as to the full effects of alcohol and alcohol misuse.

CARDAS would also like to see a continuation of hard-hitting media campaigns by the government encouraging responsible drinking and raising awareness about the negative effects of alcohol misuse. This could be targeted on issues of widespread concern including health concerns such as the effects of alcohol on weight, skin, and health in general, and the negative social effects of alcohol such as the social perceptions of those who misuse alcohol.

If we expect people to make informed choices about their use of alcohol, then we need to supply clear, reliable and targeted information that makes an impact. As the consultation document outlines, currently people are unaware of the full effects of alcohol, for instance, *"only a minority of us know the recommended daily alcohol guidelines, while just 15% can correctly estimate the number of units in a bottle of wine, and only around half of us know the number of units in a pint of beer."*⁶²

CARDAS therefore supports the development of a health improvement social marketing strategy, and we welcome the use of positive messages about the health benefits of changing behaviour.

In addition CARDAS calls on the Scottish Government to provide funding for awareness raising campaigns not only through ADATs, but also youth and student organisations such as students unions and national youth organisations that have direct contact with young people and a firm understanding of what messages might resonate with young people.

Improve alcohol product labelling

Proposals on which the Scottish Government invites views:

- Whilst the Scottish Government is not explicitly inviting views on alcohol product labelling, CARDAS would like to input our views on the proposals outlined.

CARDAS summary response

- CARDAS supports further measures to improve the information delivered on alcohol product labelling in order to raise awareness and reduce alcohol misuse

CARDAS welcomes any attempts by the Scottish Government to ensure alcohol product labelling contains clear and reliable information on the impact of consuming alcohol, so that people know what they are drinking.

CARDAS would like to see a mandatory set level of information to be supplied on alcohol product labelling in addition to current European legislation; such as unit content of the product and of average servings, recommended sensible drinking guidelines, ingredient and nutritional information as well as some level of information or message on alcohol misuse including warning labels. Specific messages pertaining to at risk groups such as pregnant women would also be desirable.

We fully support attempts to implement one system of product labelling across the UK in discussion with the UK Government, yet would also support action on product labelling at a Scottish level.

Restrictions on alcohol advertising

Proposals on which the Scottish Government invites views:

- Whilst the Scottish Government is not explicitly inviting views on restrictions on alcohol advertising, CARDAS would like to input our views on the proposals outlined.

CARDAS summary response

- CARDAS supports a ban on televised alcohol advertising before the 9pm watershed and in cinemas for films with a certificate below age 18.

CARDAS would like to see further restrictions placed upon advertising that glamorises irresponsible drinking, irresponsible promotions and pricing.

CARDAS believes that alcohol should not be advertised in a way that targets underage people. We support the Scottish Government and the British Medical Association in looking to implement a ban on alcohol advertising before the 9pm watershed and in cinemas for films with a certificate below age 18.

Promotional material in licensed premises

Proposals on which the Scottish Government invites views:

- We invite views on whether regulations should be made, under the Licensing (Scotland) Act 2005, to extend the existing regulations to:
 - a) Prevent the display on licensed premises of promotional material relating to alcohol in a way visible to persons outside the premises.
 - b) Prevent the use on licensed premises of any special display designed to promote sales of alcohol for consumption off the premises.
 - c) Prevent on licensed premises any other promotional activity to induce the sale of alcohol for consumption off the premises

CARDAS summary response

- CARDAS supports measures to restrict alcohol advertising that glamorises alcohol misuse, irresponsible promotions and pricing.
- CARDAS is not convinced of the necessity or desirability of implementing action to further restrict the use of promotional materials within licensed premises

CARDAS would question the usefulness of further restrictions on promotional materials within licensed premises.

Whilst we agree with restricting materials that glamorise alcohol misuse, irresponsible promotions and pricing, we feel that this can be achieved through other means such as banning irresponsible promotions and introducing minimum retail pricing.

The consultation document states that alcohol in itself is not considered a 'bad thing per se', and the Scottish Government do not wish to 'demonise' alcohol.⁵³ However, this proposal seems to be doing exactly that by effectively banning alcohol advertising.

If the Scottish Government is proposing to ban alcohol advertising outright then that policy should be proposed and that debate should be had. As it stands, this proposal appears to be a backdoor approach to banning alcohol advertising, which we feel would be better suited to a wider and more open discussion.

Separate alcohol checkouts

Proposals on which the Scottish Government invites views:

- We invite views on the desirability of creating separate checkouts for alcohol sales to help emphasise that alcohol is not an ordinary commodity.
- The particular criteria that should be applied in determining which types of premises should be subject to any such arrangements
- Whether there should be a requirement for alcohol checkout staff to be at least 18 years old.

CARDAS summary response

- CARDAS remains unconvinced as to the usefulness and desirability of introducing separate alcohol checkouts, and believes that given the potential for counterproductive and negative side effects, such a move should be based on clear evidence rather than speculative arguments.
- CARDAS does not believe it is necessary for alcohol checkout staff to be at least 18 years old, and would strongly object to a requirement of staff being at least 21 years old were the minimum purchase age to be increased.

Whilst not being against the idea per se, CARDAS remains unconvinced as to the usefulness and desirability of introducing new regulations to require that alcohol must be purchased through an 'alcohol only' checkout or checkouts in off-sales premises. We believe there are arguments in favour of creating separate alcohol sales checkouts, but similarly there are also arguments and practical problems against such a move. Crucially, other than arguments based on speculative theories there appears to be no clear evidence-base to suggest that such a move would or would not help tackle alcohol misuse.

Creating separate checkouts for alcohol sales might make alcohol seem like less of an 'ordinary commodity' to shoppers and it might be beneficial to create such a distinction given the risks associated with alcohol misuse. However, such a move could also be counterproductive by creating more of a forbidden fruit effect; making alcohol seem more exciting and more of a draw. It may also have the undesirable effect of demonising alcohol, as something that is fundamentally bad in itself.

We agree with the Scottish Government that creating separate alcohol checkouts would probably go some way to preventing impulse buying; by forcing shoppers to make a conscious decision if they want to browse or purchase alcoholic products – although CARDAS does not believe that impulse buying of alcoholic products is necessarily a bad thing in itself; rather misuse of it is, and introducing separate checkouts is unlikely to change the way alcohol is consumed in this regard. There is also a risk that due to the inconvenience of having to purchase alcohol at a separate checkout shoppers might bulk buy, which could potentially lead to excessive consumption and binge drinking.

There are also some clear practical problems that will need to be considered should regulations be introduced to create separate alcohol checkouts, these include:

- a) the cost of creating and staffing separate checkouts
- b) the impracticality for shoppers having to purchase alcohol and groceries at separate checkouts e.g. having to queue twice in busy stores
- c) lack of space due to the size or layout of the store
- d) the volume of alcohol sales versus other products – e.g. for stores that primarily sell alcohol there would be little point in creating a separate checkout, whereas stores that sell a relatively small volume of alcohol - i.e. gift shops - may have to stop selling altogether were they forced to create and staff a separate checkout.

Don't raise the required age of alcohol sales staff

CARDAS does not believe that it is necessary or beneficial to introduce a requirement for alcohol checkout staff to be at least 18 years old. We have yet to see a convincing case that setting such a requirement would help to tackle alcohol misuse in Scotland. CARDAS believes checkout staff need to be well-trained in the issues surrounding alcohol sales, however, we believe that it is perfectly possible to train those who are 16 or 17 to an appropriate level, and to prevent underage sales with such training – especially if added supervision from older staff is in place as an extra precaution.

We would also strongly object to any requirement for alcohol sales staff to be at least 21 – as some are suggesting – if the minimum purchase age were to be increased. 18, 19 and 20 year olds are adults and are perfectly capable of being appropriately trained in issues surrounding alcohol sales. We would also point to the potential damaging impact such a requirement could have on the availability of jobs for those under 21, many of whom currently work in the off-trade and on-trade. If such a move were applicable to the off-trade but not the on-trade this could create a perceived logical flaw and bias in the requirement.

Support better training requirements for alcohol sales staff

CARDAS welcomed the mandatory requirement in the Licensing (Scotland) Act 2005, under the conditions set out in the Licensing (Training of Staff) (Scotland) Regulations 2007, for all staff that sell or serve alcohol for consumption on licensed premises to receive a set minimum level of training, and for records to be kept on the premises of that training which can be inspected by the Licensing Standards Officer⁵⁴. If this is not currently the case in the off-trade we would like to see a similar mandatory training requirement introduced for staff that sell alcohol in off-sales premises.

ANNEX A – THE ARMADALE UNDER-21 ALCOHOL BAN

In the consultation document it is claimed⁵⁵ initial results from the Armadale trial “*have been very positive*” with the number of calls about vandalism apparently having ‘halved’ and the number of assaults having “*decreased by 57%*”.

CARDAS believes that the evidence in fact shows that the trial ban on 18 to 21 year olds purchasing alcohol in off-sales in Armadale was, if anything, unsuccessful, but that the results are subject to so many variables that they cannot reasonably be used to support any case for the proposal to raise the minimum purchase age across Scotland.

Our core criticisms of the results of the Armadale trial being used as evidence to support the proposal are as follows:

1) The evidence actually shows the trial was unsuccessful

The official report into the trial; *Armadale Under 21 Alcohol Ban*⁵⁶ released by Lothian and Borders Police shows that despite all of the hype in the media about the supposed ‘success’ of the trial, the trial actually resulted in an insignificant change in alcohol-related anti-social behaviour and in the case of minor assaults, things actually got worse during the trial, with a small increase in the average number of incidents taking place.

Given these results and the existence of numerous potential variables that could have affected the situation in Armadale, CARDAS would argue that it is not possible to extrapolate from the results that such a move would be successful if rolled out across Scotland. Furthermore, we would argue that if the trial proves anything it is that such a move is not worthwhile as a measure employed to tackle alcohol-fuelled anti-social behaviour or alcohol misuse, especially given the negative side-effects of such a move; such as infringing on the rights of 18 to 21 year olds.

The results

The official report into the Armadale trial focuses on the potential effects the ban had on youth disorder calls to the police, incidents of vandalism, and incidents of minor assault.

Youth disorder calls

	Before SNT arrival	After SNT arrival	During trial	After trial
Period	03/08/07 to 10/11/07	16/11/07 to 22/03/08	28/03/08 to 03/05/08	09/05/08 to 31/05/08
Total no. of weeks	15	19	6	4
Total no. of calls	161	104	22	16

Total no. of calls specifically referring to alcohol use	46	26	5	4
Average no. of calls per week	11	5	4	4
Average no. of calls specifically referring to alcohol use per week	3	1.37	0.83	1

In the case of youth disorder the only results in the official report released by Lothian and Borders Police related to the number of calls made to the police about youth disorder, rather than the number of incidents.

CARDAS would like to see the effect the trial had on actual incidents of youth disorder and the nature of these incidents, rather than simply the possible effect the ban might have had on calls reporting youth disorder. We would also like to see evidence of a clear link between any change in the number or nature of incidents and the ban.

As it stands there is no clear link between the ban and any change in the number of calls to police about youth disorder, or indeed any change to the number or nature of incidents.

The official figures released show that even if the ban were responsible for any effect on the number of calls to the police about youth disorder the effect was minor. During the trial the average number of calls to the police was reduced by 1, from 5 a week before the trial to 4 a week during it, with a reduction of 0.54 calls per week specifically referring to alcohol use. The number of calls after the trial ended remained the same at an average of 4 per week, with a slight increase of 0.17 calls per week specifically referring to alcohol use.

The figures do not reveal whether the number of calls changed because of increased awareness or a perceived feeling of safety because of the scheme. They also do not reveal the nature of the calls, for instance were any of the calls 'false alarms'? And how serious were the incidents involved?

In summary, CARDAS does not believe that there was a significant change in the number of calls to police about youth disorder, and due to the variables it is impossible to say whether the minor difference was related to the ban.

Vandalism incidents

	Before SNT arrival	After SNT arrival	During trial	After trial
Period	03/08/07 to 10/11/07	16/11/07 to 22/03/08	28/03/08 to 03/05/08	09/05/08 to 31/05/08
Total no. of weeks	15	19	6	4

Total no. of incidents	50	48	9	11
Average no. of incidents per week	3.3	2.5	1.5	2.75

As with youth disorder, the number of vandalism incidents recorded does not appear to have been significantly affected by the trial ban. Before the trial the average number of incidents per week was 2.5, this reduced by an average of 1 incident a week to 1.5 during the trial, and rose back to 2.75 incidents after the trial ended.

The figures do not reveal whether the incidents before, during or after the trial ban related to alcohol misuse, they also don't reveal how serious the incidents were or whether there was a clear link from the changes to the ban.

In summary, and as with the youth disorder figures, CARDAS does not believe that there was a significant change in the number of vandalism incidents, and due to the variables it is impossible to say whether the minor difference was related to the ban.

Minor assault incidents

	Before SNT arrival	After SNT arrival	During trial	After trial
Period	03/08/07 to 10/11/07	16/11/07 to 22/03/08	28/03/08 to 03/05/08	09/05/08 to 31/05/08
Total no. of weeks	15	19	6	4
Total no. of incidents	9	8	6	2
Average no. of incidents per week	0.6	0.4	0.5	0.5

The recorded changes to incidents of minor assaults are even more insignificant than the figures for youth disorder and vandalism. The average number of incidents per week were 0.4 before the trial, 0.5 during the trial, and 0.5 after the trial. Worrying, not only does this show there was no significant change, but the minor change recorded shows that the rates of minor assaults actually increased during the trial, showing if anything the ban had a counterproductive effect on tackling minor assaults.

The figures do not reveal whether the incidents before, during or after the trial ban related to alcohol misuse, they also don't reveal how serious the incidents were or whether there was a clear link from the changes to the ban.

In summary, and as with the youth disorder and vandalism figures, CARDAS does not believe that there was a significant change in the number of minor assault incidents, and due to the variables it is impossible to say whether the minor difference was related to the ban.

2) The trial was too short

The trial only lasted six weeks between 28/03/08 and 03/05/08. CARDAS does not believe that a six week trial is sufficient in these circumstances. Any results taken from a six week trial are subject to such a number of variables that they become almost worthless. We believe the trial was unsuccessful, but were it to have shown more positive results there would still be fundamental questions as to whether the move actually represented a long-term solution to alcohol misuse and alcohol-fuelled anti-social behaviour or merely a short-term barrier, that could easily be overcome.

3) The trial only took place two days a week

The Armadale trial took place on a Friday and Saturday evening between 5.00pm and 10.00pm. CARDAS believes that such a trial is not comparable to raising the minimum purchase age from 18 to 21 all day, every day, and 365 days a year, the outcomes of which are unknown.

4) Armadale cannot be compared with the whole of Scotland

Any trial taking place in one specific area in Scotland is unlikely to be representative of how such a scheme might work out when rolled out across the whole of Scotland – with its many different local cultures and contexts. For instance, an under 21 ban in Armadale is probably likely to have different outcomes to one undertaken in Aberdeen, Edinburgh, or Glasgow. Similarly a trial in Inverness may result in different outcomes to one in Dumfries or Orkney.

One example of a potential difference is that Armadale and the villages of Westfield and Blackridge are surrounded by rural farmland creating a natural geographical boundary to displacement – and Lothian and Borders Police admit that it “undoubtedly assisted in the prevention of significant displacement”. If rolled out in other localities displacement of problem individuals from one town/city to another might be more of an issue.

5) Extra awareness and police resourcing could have introduced a positive bias in the trial

It is unclear as to whether there were increased police resources during the trial ban that might have affected the outcomes of the trial. If extra resourcing were in place we would be concerned about any positive bias this might have introduced into the trial in reducing anti-social behaviour in a manner unrelated to the ban specifically. We are also aware that an increased awareness of the issues for off-license retailers and a potential increased feeling of safety due to the publicity of the scheme may have had some effects in reducing incidents and calls to the police.

As Chief Inspector J. Baird of Lothian and Borders Police recognises in the official report into the Armadale Under 21 ban when referring to the ban in the context of other schemes already being run,

“as they all ran in parallel it is not practicable, particularly with the low numbers of calls and reported crimes, to identify what operation had what effect.”⁵⁷

6) There is no evidence of any other positive effects on tackling alcohol misuse

According to the consultation document it is argued that the primary purpose of raising the minimum purchase age would be to “*reduce alcohol-related harm amongst the 18-21 age group*”⁵⁸ “*reduce excessive consumption among young people*”⁵⁹, “*generally reduce the amount of alcohol purchased by young people*”⁶⁰, with a secondary purpose to “*reduce access to alcohol by under 18s*”⁶¹

CARDAS has not seen any evidence to suggest that the trial ban had any effect on furthering these aims. Notably, these aims are not mentioned in the Lothian and Borders Police report, or in section 90 of the consultation document in which the scheme is discussed.

Conclusion

CARDAS believes that the evidence shows the Armadale trial ban was relatively unsuccessful, and given this and the number of variables affecting the results of the trial, we believe that it is unreasonable for the Scottish Government to use the trial or similar trials to support a case for raising the off-sales minimum alcohol purchase age from 18 to 21 across Scotland. If anything we believe that the results of the trial show it is not worth pursuing the proposal to increase the minimum purchase age.

ANNEX B – EVIDENCE FROM OTHER COUNTRIES

In the consultation document it is claimed that “evidence from other countries, mainly the US, suggests that raising the minimum legal drinking age reduces alcohol sales and problems among young drinkers.”⁶²

CARDAS is open to the prospect that raising the legal drinking age may have lowered alcohol sales among young drinkers in other countries. However, we do not believe that raising the minimum alcohol purchase age in off-sales will have a significant impact on reducing alcohol sales among young people in Scotland – especially given that any reduction from such a move is likely to be offset by an increase in alcohol sales in the on-trade where the minimum purchase age would remain at 18.

Neither are we convinced that any reduction in sales in other countries is purely a result of raising the legal drinking age rather than other factors such as general declines in consumption. Importantly, a reduction in sales to young people does not necessarily translate to a reduction in consumption or a change in drinking patterns among young people.

There is also a fundamental question as to the desirability of reducing alcohol sales, given that, when approached responsibly consuming alcohol is not a bad thing, we believe that alcohol sales among young people of the legal purchase age should not be seen as a bad thing per se either. In the Forward to the consultation document the Cabinet Secretary for Health and Wellbeing states that the Scottish Government are “not anti alcohol” but “anti alcohol misuse”⁶³, CARDAS would argue that aiming to reduce general alcohol sales among young people over the legal purchase age seems inherently ‘anti alcohol’.

Most importantly CARDAS does not agree with the assessment that the evidence from other countries shows that raising the minimum legal drinking age, or the minimum off-sales purchase age, will reduce alcohol problems and alcohol related harm among young drinkers. In contrast, we believe that evidence from other countries actually shows that the rate of alcohol problems and alcohol related harm is often lower in those countries with lower drinking ages and can remain unchanged or worsen in countries that raise their minimum purchase age.

Minimum alcohol purchase age around the world

The minimum alcohol purchase age around the world ranges from no minimum to 21.⁶⁴

According to the 2004 WHO report⁶⁵ on alcohol policies around the world, 92.2% of countries had a minimum purchase age of 18 or below (63.2% at 18, 0.9% at 17, 12.3% at 16, 0.9% at 15 and 14.9% at no minimum) while only 3.5% had a minimum purchase age of 21. Other countries had a minimum purchase age of 19 (2.6%) or 20 (1.8%). The only countries in the world to have a minimum alcohol purchase age of 21 were Indonesia, Micronesia, Palau, and the USA.

Minimum purchase age on-sales vs. off-sales

The consultation document claims that “*in some countries the minimum age of purchase differs between off and on sales, or by the type of alcohol product being purchased*”⁶⁶ and points to Sweden and Norway as evidence of this. The inclusion of this statement in the consultation document suggests by implication that this fact supports the Scottish Government’s case for raising the minimum off-sales alcohol purchase age from 18 to 21 in Scotland.

CARDAS does not believe that this is the case; rather we believe that the evidence internationally suggests that there is little precedent for such a policy around the world.

In 2004⁶⁷, 90.4% of countries had no differences between their on-sales minimum purchase age and their off-sales minimum purchase age (notably, Norway was one of these countries, where the difference in minimum purchase age for spirits compared to beer and wine products was the same in on and off sales).

Where there was a difference in purchase age between on and off sales, in the majority of cases the minimum purchase age in off-sales was actually lower than the minimum purchase age in place in on-sales. 7.9% of countries had a lower minimum purchase age in off-sales than on-sales (these included Bosnia, Croatia, Denmark, Greece, Israel, Lao PDR, Luxembourg, Malta and Malaysia). Only 1.75% of countries had a higher minimum purchase age in off-sales compared to on-sales (Finland and Sweden). Furthermore, in Finland the higher off-sales minimum alcohol purchase age was only applicable to spirits (a minimum purchase age of 20 versus 18 for all other off-sales alcohol products and all on-sales alcohol products).

Off-sales minimum purchase age beer & wine vs. spirits

In some countries the sale of spirits in off-sales has a higher minimum purchase age than beer and wine products – largely due to the alcoholic strength of spirits products. In 2004⁶⁸ this was true for 5.3% of countries including Austria, Germany, the Netherlands and Switzerland, which all had a minimum purchase age of 16 for beer and wine compared to 18 for spirits, and Finland and Norway which had a minimum purchase age of 18 for beer and wine compared to 20 for spirits.

The vast majority of countries (89.5%) had a minimum off-sales purchase age for spirits of 18 or below (61.4% were 18, 6.1% were 16, 1.8% were 15, and 20.2% had no minimum purchase age). In comparison, only 10.5% had a minimum off-sales purchase age for spirits of 19 or above (2.6% were 19, 4.4% were 20, and 3.5% were 21).

Relationship between the minimum off-sales purchase age and alcohol problems

Around the world rates of alcohol misuse, and alcohol-related problems vary, and CARDAS has seen no evidence to suggest there is a clear link between the minimum off-sales purchase age and the rate or extent of alcohol misuse and related problems. Neither have we seen any evidence in the consultation document or otherwise to suggest that the introduction of a higher minimum off-sales purchase age has a specifically positive effect on reducing alcohol misuse and related problems.

If anything we believe that the evidence suggests that lower alcohol purchase ages result in less alcohol-related problems, and higher alcohol purchase ages actually worsen alcohol-related problems.

For instance, In France, in 2004, the minimum off-sales alcohol purchase age was 16⁶⁹, and binge drinking as a percentage of all drinking was 9% for males and 5% for females. In comparison the minimum off-sales purchase age was 18 in the UK and binge drinking as a percentage of all drinking was 40% for males and 22% for females.⁷⁰ Furthermore, over the past 20-30 years alcohol consumption in France has fallen, despite having a lower minimum alcohol purchase age,⁷¹ while alcohol consumption in the UK has more than doubled since 1950, and the UK has a higher minimum purchase age.⁷² If any link is to be drawn here it would not be that a higher minimum off-sales purchase age was beneficial to tackling alcohol misuse.

Evidence from the USA

The USA is perhaps the most significant of the few examples of countries with a minimum alcohol purchase age of 21.

Contrary to the suggestion made in the consultation document, CARDAS believes that the increase in the minimum purchase age from 18 to 21 has not worked in the USA, where there is still a major alcohol misuse problem among young people and the general population, which raising the minimum purchase age has done little to tackle. In some cases it appears that this policy has actually been counterproductive.

Alcohol misuse and related problems in the USA remain apparent

Despite a minimum purchase age of 21, alcohol misuse and related problems remain apparent in the USA, including among young people. The US still has massive problems with underage purchasing and consumption of alcohol, binge drinking, and alcohol-related crimes, anti-social behaviour and health problems⁷³. In essence, alcohol misuse is still negatively affecting the health, safety, wealth, and success of young people and the general population. It is recognized by many in the US that raising the minimum purchase age has not been a success, as Dr Roderick B. Park, former Chancellor of the University of Colorado, and vice Chancellor at Berkeley echoes, "It is clear that the minimum drinking age of 21 is not working."⁷⁴

Alcohol misuse remains the leading drug problem among young people. According to 'Monitoring the Future', the Federal Government's annual survey of drug use among 8th, 10th and 12th graders, more underage young people drink alcohol than smoke cigarettes or use illegal drugs.⁷⁵ While the average age at which a young person has their first drink has actually decreased to 14 since the minimum purchase age was raised and has held steady around this age⁷⁶ and when surveyed 51% of high school seniors and 26% of eighth-graders admitted drinking within the past 30 days.⁷⁷

The US 2006 National Survey on Drug Use and Health⁷⁸ showed that about 10.8 million persons aged 12 to 20 (nearly 30% of the age group) reported drinking alcohol in the past month, and approximately

7.2 million (19%) were binge drinkers (consuming five or more drinks at a sitting, usually defined as within two hours). 2.4 million (6.2%) were heavy drinkers. The report also showed that, of all those who had tried alcohol for the first time in the past 12 months, 89.2% were younger than 21. These figures are part of a long-term trend, for instance the US 2004 National Survey on Drug Use and Health reported similar results with 28.7% of youth aged 12 to 20 reported drinking alcohol and 19.6% reported binge drinking.⁷⁹

Alcohol misuse problems are affecting all groups of underage young people in the USA, and can be worse than those problems affecting those above the minimum purchase age. For instance, according to research undertaken by Ruth C. Engs, Professor of Applied Health Sciences, at Indiana University, Bloomington, the minimum purchase age of 21 is being flaunted, and a pattern of irresponsible drinking is readily seen among US university students. Professor Engs suggests that “those under the age of 21 are more likely to be heavy – sometimes called ‘binge’ – drinkers” with 22% of all students under 21 compared to 18% over 21 being heavy drinkers, and 34% of drinkers under 21 compared to 24% of drinkers over 21 being heavy drinkers.⁸⁰

This sort of alcohol misuse has devastating effects to the lives of young people and their families. For instance, the US Surgeon General estimates that approximately 5,000 people under 21 die from alcohol related injuries involving underage drinking each year.⁸¹

Alcohol misuse problems have got worse since the minimum purchase age was increased

Whilst less young people in America as a proportion of the population are drinking alcohol, this is part of a pattern in the general population of reduced consumption that emerged around 1980 (years before the increase in the minimum purchase age) and has continued since.⁸²

Worryingly however since the minimum purchase age was increased rates of alcohol misuse and related problems have increased. Now, when young people in America do drink alcohol, they tend to drink more abusively⁸³, for instance, 90% of the alcohol consumed by 18-20 year-olds is consumed when the individual is engaged in an episode of heavy drinking.⁸⁴ As Professor Ruth C. Engs argues, “Like national prohibition, it has been counterproductive. Raising the drinking age was much worse than doing nothing...more young people tend to drink abusively when they do consume. This change occurred after the increase in the drinking age.”⁸⁵ One of the most obvious and worrying examples of this is the reckless and dangerous growing trend of consuming 21 shots of hard liquor on your 21st birthday that is currently spreading across the USA.⁸⁶

While, in a study⁸⁷ of thousands of students at the same 56 colleges and universities taking place between 1982-3, 1984-5, and 1987-8 the conclusion drawn was that “*results revealed few changes in collegiate drinking patterns and problems attributable to the nationwide increase in the minimum age for alcohol purchase*” with the proportion of underage students who drank (81%) remaining higher than the proportion of legal age students who drank (75%), and the proportion of students categorized as heavy drinkers remaining constant, with 24.09% of underage students reporting heavy drinking compared to 15.9% of those above the minimum purchase age.⁸⁸

There has been a specific increase in problems relating to heavy and irresponsible drinking among college age youth. Recent studies report that 44% of college students had engaged in a night of binge drinking in the last two weeks⁸⁹ While a study lasting from 1982 until 1987 showed about 46% of students reported 'vomiting after drinking' jumping to over 50% after the law changed. Similarly significant increases were also found in other variables 'cutting class after drinking' jumped from 9% to almost 12%, 'missing class because of hangover' went from 26% to 28%, 'getting lower grades because of drinking' rose from 5% to 7% and 'been in a fight after drinking' increased from 12% to 17%.⁹⁰

Other studies have shown similar results indicating that an increase in the minimum purchase age for alcohol does not reduce alcohol misuse and related problems and can worsen these. For instance:

- A study of young people between the ages of 16 and 19 in Massachusetts and New York after Massachusetts raised its drinking age revealed that the average, self-reported daily alcohol consumption in Massachusetts did not decline in comparison with New York.⁹¹
- A comparison of college students in states that had maintained (for a period of at least ten years) a minimum drinking age of 21, with those states that had similarly maintained minimum drinking ages below 21 revealed few differences in drinking problems.⁹²
- A study of all 50 states and the district of Columbia found a "*positive relationship between the purchase age and single-vehicle fatalities.*" Thus single vehicle fatalities were found to be more frequent in those states with higher purchase ages.⁹³
- A study that examined college students' drinking behaviour before and after an increase in the minimum drinking age from 18 to 19 in New York State found the law to have no impact on under-age students' consumption rates, intoxication, drinking attitudes, or drinking problems. These findings were corroborated by other researchers at a different college in the same state.⁹⁴
- A longitudinal study of the effect of a one-year increase of the drinking age in the province of Ontario found that it had a minimum effect on consumption among 18 and 19 year old high school students and none among those who drank more than once a week or more.⁹⁵
- A similar study conducted among college students in the State University System of Florida to examine their behaviour before and after an increase in the drinking age from 19 to 21 showed whilst consumption reduced, alcohol-related problems increased significantly.⁹⁶
- Surveys at Arizona State University before and after that state raised the drinking age from 19 to 21 found no reduction in alcohol consumption.⁹⁷
- Finally, an examination of East Carolina University Students' Intentions regarding their behaviour following the passage of the 21 year age drinking law revealed only 6% intended

to stop drinking, 70% planned to change their location of drinking, 21% expected to use fake or borrowed ID to obtain alcohol, and 22% intended to use other drugs.⁹⁸

Alcohol sales are being targeted at young drinkers

It is also clear that the alcohol industry still consider there to be a market in the USA for underage sales, which suggests that underage people are getting hold of alcohol in significant amounts.

From 2001 to 2007, youth exposure to alcohol product advertising on television in the USA rose by 38%. The average number of television advertisements seen in a year by youth increased from 216 to 301. In 2007, approximately one out of every five alcohol product advertisements on television was on programming that youth ages 12 to 20 were more likely per capita to see than adults of the legal drinking age.⁹⁹

Furthermore, not only is alcohol being marketed to young people, but alcoholic products also appear to be being designed by the alcohol industry specifically targeted towards the youth market, as George Hacker, Director of the Alcohol Policies Project at the Center for Science in the Public Interest states, *"the trend has gone to developing products that are highly youth orientated."*¹⁰⁰

One example of this is the development of alcopops, which the California-based Marin Institute estimates have been tried by one third of teenage girls aged 12 to 18. The Marin Institute also claim that in 2007 47% of all alcopops sold in California were consumed by underage drinkers.¹⁰¹

A reduction in road traffic accidents does not necessarily relate to the minimum purchase age

In the consultation document the Scottish government note that studies show a reduction in road traffic accidents in the USA since the minimum purchase age was increased.¹⁰²

Whilst CARDAS believes that there may well have been a decrease in road traffic accidents in the USA over the period that the minimum alcohol purchase age has been increased. We believe that simply attributing this to the increase in the minimum alcohol purchase age his ignores the fact that there are many potential factors contributing to this decrease.

Not only did the pattern of decline in drink-driving and road traffic accidents begin in the early 1970s, years before the passage of the National Minimum Drinking Age Act¹⁰³ but there have also been numerous measures implemented before and since the minimum purchase age went up to 21 that are likely to have had a major effect on drink-driving and alcohol-related traffic accidents. For instance during the 1980s and 1990s, legislative changes (such as mandatory seatbelt laws, lower BAC limits, and stricter rules on automobile safety standards)¹⁰⁴, increased law enforcement, tougher persecution and punishment, and public education schemes were all introduced.

The decline in alcohol-related fatalities seen in the United States over the past two and a half decades is attributable to a combination of factors, including but not limited to safer vehicles, increased public awareness of the dangers of drink-driving, use of designated drivers, sobriety

checkpoints, zero-tolerance laws for young drivers, and altogether more stringent enforcement of alcohol-impaired driving laws have led to the reduction seen in rates of drink-driving and related deaths.

Why raising the minimum purchase age worsened alcohol misuse and related problems

One theory explaining the failure of raising the purchase age as a tool in the attempt to tackle alcohol misuse and related problems among young people in the USA, is reactance theory.

CARDAS would argue that attempting to prevent alcohol consumption by increasing the minimum purchase age only serves to create a reactance motivation among those affected, and thus leads to increased alcohol misuse as a result.

In a society that prohibits the purchase of alcohol by young adults, alcohol becomes more of a forbidden fruit and a badge of rebellion. It becomes more exciting and when underage people do get hold of, which they inevitably do, they tend to misuse it, as evidenced above.

Public calls for the minimum purchase age to be lowered

Given that over a period exceeding two decades the increase in the minimum purchase age has failed to tackle alcohol misuse, and has been counterproductive to this end in many respects, it is no wonder that a broad range of academics, health professionals, police and university chiefs, journalists and members of the public in the USA are calling for the purchase age to be lowered back down to 18.

A recent movement involving about a hundred of America's college Presidents - called the Amethyst Initiative - is calling on politicians to lower the drinking age to 18, arguing current laws encourage alcohol misuse on campus.¹⁰⁵ The former President of Middlebury College at Vermont; Professor John M. McCardell Jr who started the movement claims that *"the 21-year-old drinking age is bad social policy and terrible law... Our latter day prohibitionists have driven drinking behind closed doors and underground. This is the hard lesson of prohibition that each generation must relearn."*¹⁰⁶

This comes on top of a mass movement of young people in the USA who feel that their rights are being infringed upon. Public campaigns expressing the view that the minimum purchase age should be lowered include the Choose Responsibility campaign¹⁰⁷, the National Youth Rights Association's campaigning work,¹⁰⁸ and the many campaign groups with hundreds of thousands of members on social networking sites such as Facebook.¹⁰⁹

Notably, despite the risk of funding penalties from the federal government, these ongoing public campaigns appear to be having some significant effect with at least seven US states currently considering lowering the minimum purchase age, including Kentucky, Wisconsin, South Carolina, Missouri, South Dakota, Minnesota, and Vermont¹¹⁰

Case studies

CARDAS has asked international students studying in Scotland to tell us about their experiences with the minimum off-sales alcohol purchase age in their home countries. Below are a representative sample of the responses we received, and whilst we realise that these case studies represent the views of individuals, we still think they are useful indicators.

Chris Pesch, 20, Echternach, Luxembourg - studying at the University of Glasgow, Scotland

“I’m from Luxembourg and our legal drinking age is 16. But in most cases young people are slowly and carefully introduced to alcohol when they’re about 14 years old. I think we have much less problems with alcohol, because young people are shown that it’s a part of adult life and they learn what its consequences are. Furthermore, it seems ridiculous to think that when you’re 18 you’re old and responsible enough to go to Iraq and die in a war, but you’re not old enough to decide whether you want to drink or not. It’s a decision you make about your own body - and going to war demands more maturity than having a drink.”

Sebastian Reetz, 19, Bronxville, New York – studying at the University of St Andrews, Scotland

“I’m a St Andrews student from New York, It is very clear that the 21 year old drinking age in America is not working. Underage people drink anyway, there are a myriad of fake IDs available, stores are often very lenient with serving to underage persons, and because it is illegal, people drink too quickly and don’t recognize their limits. Consequently there is often dangerous binge drinking. Because of this problem, 100 prominent universities have recently proposed to lower the drinking age to 18 in the states.”

Caitlin Crowe, 19, San Francisco, California - studying at the University of Edinburgh, Scotland

“I am American, and the majority of my friends at home are under the age of 21. Especially in American universities, drinking is a huge part of youth culture for people ages 17-21, as well as for those who are older. Most of my friends use fake IDs, binge drink (some to the point of hospitalization), and drink whatever they can get their hands on (which is usually poor quality). Raising the minimum purchase age doesn’t prevent drinking among young people anywhere; it just makes it more “exciting” and leads to further danger and excess.”

Tommy Story, 20, Winter Park, Florida – studying at the University of St. Andrews, Scotland

“I’m from America where binge drinking is much more common. Just watch any American high school or college movie.”

Rob Burgess, 19, Mold, Wales - studying at the University of St. Andrews, Scotland

“I’m from Britain but in my experience (and I have been abroad a lot) the levels of excessive drinking in the UK are caused by a high drinking age. In France and Italy where the drinking age is lower, people don’t see getting a drink as so special and so getting drunk isn’t such big deal.”

Louisa Low, 19, Houston, Texas – studying at the University of Glasgow, Scotland

“I was born in London, and then moved to Aberdeen, and I've been living in the US (Houston, TX) for five years now. As far as I can tell, the older drinking age in Texas only encourages more illegal or socially "taboo" behaviour. Where in the UK you would have drinks at your house, here, young people either a) get a fake ID to buy alcohol, risking prison time, b) steal alcohol, c) pay someone else to buy it for them, or d) do drugs. Yes, pot, coke, and E's are all illegal, but they are way easier and probably safer to come by here than alcohol. Also, I went to an international school. What I saw among my friends is that the Europeans or the ones who had lived for some time in Europe had a much better relationship with alcohol than the Americans. For the Americans drinking is a macho thing, and of course most of the kids who drank a lot also drove because their parents wouldn't expect their 17 year-old son to come home wasted that night.”

Kirsty Underwood, 18, St. Andrews – studying at the University of St. Andrews

“I'm dual nationality, British and American, and have spent my life growing up in different countries around the globe. In my opinion, raising the drinking age encourages the binge drinking culture which the government is desperate to avoid. The US has a serious problem with underage college students who go to keg parties and just cannot hold their alcohol, choose not to drink responsibly and just want to get wasted. Raising the age to 21 will just spread this attitude even further! To make things even more interesting, my mother was raised a Mormon in Utah so her parents wouldn't let her drink at all. This attitude in my opinion encourages rebellion and she did. By contrast, my parents' attitudes are much more relaxed, and going out for me has never been about getting wasted. I completely disagree with the proposal to raise the off-sales minimum purchase age because the government's attitude is completely naive. Simply by looking at the evidence from other countries, and the attitudes that other nations take to alcohol as a response to the drinking age, common sense dictates it should be lowered not raised.”

Conclusion

CARDAS believes that the evidence from abroad suggests that raising the minimum off-sales alcohol purchase age does not tackle alcohol misuse, harm or related problems. If anything the evidence shows that raising the minimum purchase age is counter-productive to this cause, and creates a reactance effect encouraging and increasing irresponsible patterns of alcohol consumption among young people such as binge drinking. This is perhaps why so few of the countries around the world have a minimum off-sales purchase age above 18, and why the vast majority have one of 18 or below. It would be odd if the Scottish Government were to pursue with such a proposal against the grain of international evidence, and at a time when states within the USA are actively pursuing proposals to reduce the purchase age to 18 because 21 has not worked.

ANNEX C – FULL LIST OF SUMMARY RESPONSES

Section 1 - Reduced Consumption

Irresponsible promotions and below-cost selling

- CARDAS supports proposals to prevent the sale of alcohol as a loss leader, and end promotions offering free alcohol or quantity discount for bulk buying.

Minimum retail pricing

- CARDAS supports the introduction of a minimum pricing scheme for alcohol products across the on and off trade based on alcoholic strength
- CARDAS believes a minimum price of 35 pence per unit would be sufficient to eradicate irresponsible pricing but not so high as to unfairly penalise responsible drinkers on lower incomes

Promoting choice in standard measures of alcohol

- CARDAS supports the introduction of smaller standard measures of wine at 125ml and spirits at 25ml
- CARDAS calls for mandatory and clear unit information to be presented on drinks menus

Section 2 – Supporting Families and Communities

Information for parents

- CARDAS welcomes the focus on parents and carers and encourages the Scottish government to offer improved advice and support in teaching children about responsible drinking through what we say and do.
- CARDAS calls on the Scottish Government to set a mandatory standard of alcohol education in schools
- CARDAS supports the continued roll-out of Hard-hitting publicity campaigns that put a focus on issues of widespread concern
- CARDAS calls on the Scottish Government to play their part in delivering and developing enticing alternative activities for young people

Raising the minimum purchase age

- CARDAS strongly believes that the minimum age for off-sales alcohol purchases should not be raised from 18 to 21 in Scotland, and urges the Scottish Government to drop this proposal.
- CARDAS calls on the Scottish Government to put an end to all current schemes – and prevent any such future schemes - that discriminate against anyone who is above the current minimum age for alcohol purchases in the provision of goods, facilities and services on the grounds of their age.

- CARDAS calls for the introduction of a mandatory Challenge 21 scheme to be introduced in all licensed premises as part of the conditions of the license.
- CARDAS calls for the Scottish Government to facilitate the development of a national proof of age card that is recognised as appropriate proof of age identification in all licensed premises in Scotland – forming a recognised, forge-safe, alternative to carrying a passport or driver’s license as ID.
- CARDAS calls for increased use of test purchasing and other such schemes to crack down on licensed premises that sell alcohol to anyone under the minimum purchase age.
- CARDAS calls for better publicised and enforced penalties for those licensed premises and individuals involved in selling to - and buying alcohol for – anyone under the minimum alcohol purchase age.
- CARDAS calls for measure to be introduced to clamp down on organisations promoting and organising irresponsible ‘binge tours’

Social responsibility fee

- CARDAS broadly supports the principle of a ‘social responsibility fee’, but with some reservations as to its implementation
- CARDAS believes that if a social responsibility fee is to be introduced:
 - 1) Any such fee must apply to all alcohol retailers across the on and off-trade, including, but not limited to, specific problematic premises
 - 2) That the fee levied should ideally be linked to alcohol by volume sold, or if this is not practical, by alcohol sales turnover to hit those
 - 3) That there should be a system of discounts and/or exemptions based upon positive contributions to the community/society
- CARDAS believes that it is the duty of the individual to consume alcohol responsibly, and that alcohol retailers and general taxation should not be responsible for shouldering the full financial burden to society. CARDAS therefore calls for measures to be implemented to ensure that those individuals who misuse alcohol and bring about associated costs to society - e.g. in policing and health resources - bear more of the financial burden.

Section 3 – Positive Attitudes, Positive Choices

Continue to roll out targeted awareness raising campaigns

- CARDAS fully supports the continued roll-out of targeted awareness-raising campaigns
- CARDAS calls on the Scottish Government to provide funding for awareness raising measures delivered through youth and student organisations

Improving alcohol product labelling

- CARDAS supports further measures to improve the information delivered on alcohol product labelling in order to raise awareness and reduce alcohol misuse

Restrictions on alcohol advertising

- CARDAS supports a ban on televised alcohol advertising before the 9pm watershed and in cinemas for films with a certificate below age 18.

Promotional material in licensed premises

- CARDAS supports measures to restrict alcohol advertising that glamorises alcohol misuse, irresponsible promotions and pricing.
- CARDAS is not convinced of the necessity or desirability of implementing action to further restrict the use of promotional materials within licensed premises

Separate alcohol checkouts

- CARDAS remains unconvinced as to the usefulness and desirability of introducing separate alcohol checkouts, and believes that given the potential for counterproductive and negative side effects, such a move should be based on clear evidence rather than speculative arguments.
- CARDAS does not believe it is necessary for alcohol checkout staff to be at least 18 years old, and would strongly object to a requirement of staff being at least 21 years old were the minimum purchase age to be increased.

ANNEX D – FULL LIST OF CARDAS MEMBERS

The Coalition Against Raising the Drinking Age in Scotland (CARDAS)

The Coalition Against Raising the Drinking Age in Scotland (CARDAS) is a coalition of local and national youth and student representative organisations in Scotland. We aim to provide a youth and student perspective on the Scottish Government's strategic approach to tackling alcohol misuse. Our membership includes:

National members

National Union of Students Scotland (NUS Scotland)

NUS Scotland is the primary national representative body for students in Scotland. It is a confederation of local student representative organisations in colleges and universities across the country. It is one of the largest student organisations in the world, representing over 80% of all the students in higher education and over 90% of students in further education. NUS Scotland provides research, representation, training and expert advice for individual students and students' unions.

<http://www.nus.org.uk>

The Scottish Youth Parliament

The Scottish Youth Parliament is a democratically elected youth organisation in Scotland, consisting of elected members aged between 14 and 25. The Scottish Youth Parliament aims to be an effective, open, honest, inclusive and broad-minded collective national voice for Scotland's young people. It aims to make a difference in society by increasing young people's participation; promoting a positive image of young people; connecting the processes of policy making and development with young people, and; being an independent and youth-led organisation free from influence, where young people can give their views to policy makers without hindrance, fear or barriers. The work of the SYP is centered around involving young people in the decision-making process, particularly in consulting with young people and campaigning for these views to be adopted by the relevant decision-makers.

<http://www.scottishyouthparliament.org.uk>

National Union of Students Services Ltd (NUSSL)

NUS Services is limited company dedicated to furthering the fortunes of both students and students' unions, by acting as a gateway to commercial companies who want to target the student market. It was formed in the 1970s as a purchasing consortium for students' unions across the UK, but has since grown and now supports most areas of students' unions commercial activity. NUSSL is owned by the National Union of Students and the 220+ participating Students' Unions.

<http://www.nussl.co.uk>

Northern Services

Northern Services is a students' union purchasing consortium, which came into being in 1985.

<http://www.northernservices.org.uk>

Local members

Aberdeen University Students' Association

Aberdeen University Students' Association (AUSA) provides representation and services for its 13,000+ students. It is run by students, for students, to enhance their experiences and enable students to enjoy and gain more from their university education.

<http://www.ausa.org.uk>

Dundee University Students' Association

Dundee University Students' Association (DUSA) is a charity (Reg. No. SC016047) run by students for students. Its purpose is to provide independent and professional advice, representation and welfare services. As well as providing safe and responsible social & recreational services and facilities for the student body.

<http://www.dusa.co.uk>

Edinburgh College of Art

Edinburgh College of Art Students' Union exists to defend, extend and promote the rights of its students. The SU is independent of the College and provides representation, support, advice and social activities for its 1600+ students.

<http://www.eca.ac.uk>

Edinburgh University Students' Association

Edinburgh University Students' Association (EUSA) is a charity (Reg. No. SC015800) that exists to secure a world-leading student experience at the University of Edinburgh. The Students' Association is run by students, for students and provides independent and professional advice, representation, and commercial services for its 25,000+ members.

<http://www.eusa.ed.ac.uk>

Glasgow School of Art Students' Association

The GSA Students' Association provides services for the exclusive benefit of its members. It is a forum for student opinions, an active social space, a network for creative development and an important venue for entertainment.

<http://www.theartschool.co.uk>

Glasgow University Students' Representative Council

Glasgow University Students' Representative Council exists to secure a world-leading student experience at the University of Glasgow. The SRC is run by students, for students and provides independent and professional advice and representation for its 25,000+ members.

<http://www.glasgowstudent.net>

Heriot-Watt University Students' Association

Heriot-Watt University Students' Association (HWUSA) exists to secure a world-leading student experience at Heriot-Watt University. The Students' Association is run by students, for students and provides independent and professional advice, representation, and commercial services for its 17,000+ members.

<http://www.hwusa.org>

Napier Students' Association

Napier Students' Association (NSA) exists to secure a world-leading student experience at Napier University. The Students' Association is run by students, for students and provides independent and professional advice, representation, and commercial services for its members.

<http://www.napierstudents.com/>

The Glasgow University Union

Founded in 1885, The Glasgow University Union is one of the two students' unions at the University of Glasgow. The Glasgow University Union provides a variety of commercial and community services for its members.

<http://www.thequu.com>

The Queen Margaret Union

Founded in 1890, The Queen Margaret Union is one of the two students' unions at the University of Glasgow. The Queen Margaret Union provides a variety of commercial and community services for its members.

<http://www.qmu.org.uk>

University of St Andrews Students' Association

The University of St Andrews Students' Association exists to secure a world-leading student experience at the University of St Andrews. The Students' Association is run by students, for students

and provides independent and professional advice, representation, and commercial services for Its 8,000+ members.

<http://www.yourunion.net>

University of Strathclyde Students' Association

The University of Strathclyde Students' Association (USSA) exists to secure a world-leading student experience at the University of Strathclyde. The Students' Association is run by students, for students and provides independent and professional advice, representation, and commercial services for Its 25,000+ members.

<http://www.strathstudents.com>

University of the West of Scotland Students' Association

The University of the West of Scotland University Students' Association (SAUWS) exists to secure a world-leading student experience at the University of the West of Scotland. The Students' Association is run by students, for students and provides independent and professional advice, representation, and commercial services for Its 18,000+ members.

<http://www.sauws.org.uk>

ANNEX E – ENDNOTES & REFERENCES

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- ¹ *Changing Scotland's relationship with alcohol: a discussion paper on our strategic approach*, Scottish Government, June 2008, p.10, sections 23-25
- ² *Calling time: the nation's drinking as a major health issue*, Academy of Medical Sciences, March 2004
- ³ 'Action to Tackle Scotland's Drink 'Time-Bomb'', Scottish Government press release, June 17, 2008
- ⁴ *Changing Scotland's relationship with alcohol: a discussion paper on our strategic approach*, Scottish Government, June 2008, p.26, section 89.
- ⁵ 'Action to Tackle Scotland's Drink 'Time-Bomb'', Scottish Government press release, June 17, 2008
- ⁶ *Changing Scotland's relationship with alcohol: a discussion paper on our strategic approach*, Scottish Government, June 2008, p.27, section 92.
- ⁷ *Changing Scotland's relationship with alcohol: a discussion paper on our strategic approach*, Scottish Government, June 2008, p.26, section 89.
- ⁸ *Changing Scotland's relationship with alcohol: a discussion paper on our strategic approach*, Scottish Government, June 2008, p.27, section 92.
- ⁹ See *Annex B: Evidence from other countries*
- ¹⁰ See *Annex A: The Armadale under-21 alcohol ban* , and, *Annex B: Evidence from other countries*
- ¹¹ See *Annex B: Evidence from other countries*
- ¹² *Changing Scotland's relationship with alcohol: a discussion paper on our strategic approach*, Scottish Government, June 2008, p.26, section 88.
- ¹³ Chassin, L., Pitts, S.C., & Prost, J. (2002). *Binge drinking trajectories from adolescence to emerging adulthood in a high-risk sample: Predictors and substance abuse outcomes*. *Journal of Consulting and Clinical Psychology*, 70(1), 67-78. DeWit, D.J. Adlaf, E.M., Offord, D.R. & Ogborne, A.C. (2000). *Age at first alcohol use: A risk factor for the development of alcohol disorders*. *American Journal of Psychiatry*, 157, 745-750.
- ¹⁴ See *Annex B: evidence from other countries*
- ¹⁵ See, for example:
<http://www.thecourier.co.uk/output/2008/08/04/newsstory11751233t0.asp>
- ¹⁶ *Scottish School Adolescent Lifestyle and Substance Use Survey (SALSUS) 2006: National Report*, Information Services Division, 2007

-
- ¹⁷ *Underage Drinking and the Illegal Purchase of Alcohol*, Scottish Executive Social Research, 2003, p.1.
- ¹⁸ *Underage Drinking and the Illegal Purchase of Alcohol*, Scottish Executive Social Research, 2003, p.5.
- ¹⁹ *Changing Scotland's relationship with alcohol: a discussion paper on our strategic approach*, Scottish Government, June 2008, p.27, section 92.
- ²⁰ *Changing Scotland's relationship with alcohol: a discussion paper on our strategic approach*, Scottish Government, June 2008, p.27, section 92.
- ²¹ *The Scottish Health Survey Volume 2: Adults*, Scottish Executive, 2005
- ²² *Understanding Alcohol Misuse in Scotland: Harmful Drinking, Final Report*, SEDAA, March 2008, p.11.
- ²³ Data from TNS Worldpanel, May 2008
- ²⁴ *Alcohol: Price, policy and public health: report on the findings of the expert workshop on price convened by SHAAP*, SHAAP, December 2007, p.35.
- ²⁵ *Understanding Alcohol Misuse in Scotland: Harmful Drinking, Final Report*, SEDAA, March 2008, p.17.
- ²⁶ See, for example: *Alcohol in Europe: A Public Health Perspective*, institute of Alcohol Studies, 2006
- ²⁷ See *Annex B: Evidence from other countries*
- ²⁸ See *Annex B: Evidence from other countries*
- ²⁹ See <http://www.infoscotland.com/licensingact/files/Licensing-Act-Briefing-Pack.pdf>
- ³⁰ See <http://www.scotland.gov.uk/News/Releases/2008/07/07081202>
- ³¹ See: http://epetitions.scottish.parliament.uk/view_petition.asp?PetitionID=253
- ³² See: http://epetitions.scottish.parliament.uk/view_petition.asp?PetitionID=251
- ³³ See: <http://www.new.facebook.com/group.php?gid=12655891242&ref=ts>
- ³⁴ See: <http://www.new.facebook.com/group.php?gid=26590025518&ref=ts>
- ³⁵ See: <http://www.alcohol-focus-scotland.org.uk/>
- ³⁶ See: http://newsvote.bbc.co.uk/1/hi/uk/6948419.stm?dynamic_vote=ON#vote_drinking_age
- ³⁷ See: www.alcohol-focus-scotland.org, (retrieved 8th April, 2008)

³⁸ See:

http://www.eveningtimes.co.uk/news/display.var.2138225.0.drinking_age_may_be_raised_to_21.php

³⁹ The Nicholson Committee Report on its Review of Liquor Licensing Law in Scotland:

<http://www.scotland.gov.uk/Resource/Doc/47133/0027021.pdf>

⁴⁰ Scottish Government Scottish Liquor Licensing Statistics, 2007:

<http://www.scotland.gov.uk/Resource/Doc/235171/0064525.pdf>

⁴¹ *Underage Drinking and the Illegal Purchase of Alcohol*, Scottish Executive Social Research, 2003, p.1.

⁴² 'One in five fail test purchasing', by Chris Fitzgerald, in Scottish Licensed Trade News (STLN), August 7 2008

⁴³ See: <http://www.infoscotland.com/licensingact/files/Licensing-Act-Briefing-Pack.pdf> p.7

⁴⁴ See: http://www.lbp.police.uk/press_release/articles/2008%5CJune%5C03%5C2.htm

⁴⁵ For information on 'student night out' please see either:

- The official website:

<http://www.uk-students.co.uk/>

- Or, the following promotional group on the social networking site 'Facebook':

<http://www.new.facebook.com/group.php?gid=10694325046&refurl=http%3A%2F%2Fwww.new.facebook.com%2Fs.php%3Fq%3Dduck%2527d%26n%3D-1%26sf%3Dt%26init%3Dq%26k%3D200000010>

⁴⁶ See: <http://www.carnageuk.com/>

⁴⁷ Alcohol Statistics Scotland 2007:

http://www.alcoholinformation.isdscotland.org/alcohol_misuse/files/Alcohol%20Bulletin.pdf

⁴⁸ See: <http://www.bbnuuk.com>

⁴⁹ An example of campaign materials from HWUSA's Boozy Betty campaign:

http://www.edinburgh.gov.uk/internet/Attachments/Internet/Business/Licensing/licences/Liquor/Affirmation_2/BoozyBettyPosterA414April08.pdf

⁵⁰ An example of local press coverage for the Boozy Betty campaign:

<http://edinburghnews.scotsman.com/topstories/Boozy-Betty-serves-up-lessons.3643876.jp>

⁵¹ *Alcohol Policy in the WHO European Region: current status and the way forward*, World Health Organisation Fact Sheet EURO/10/05, WHO, September 2005

-
- ⁵² *Changing Scotland's relationship with alcohol: a discussion paper on our strategic approach*, Scottish Government, June 2008, p.12, section 29.
- ⁵³ *Changing Scotland's relationship with alcohol: a discussion paper on our strategic approach*, Scottish Government, June 2008, p.1
- ⁵⁴ See: <http://www.infoscotland.com/licensingact/files/Licensing-Act-Briefing-Pack.pdf>
- ⁵⁵ *Changing Scotland's relationship with alcohol: a discussion paper on our strategic approach*, Scottish Government, June 2008, p.26, section 90.
- ⁵⁶ *Armadale Under 21 Alcohol Ban: A report on the result of the trial of restricting sale of alcohol to persons over the age of 21 in Armadale on Friday and Saturday nights between 28th March 2008 and 3rd May 2008*, Lothian and Borders Police, Chief Inspector J. Baird, July 2008
- ⁵⁷ *Armadale Under 21 Alcohol Ban: A report on the result of the trial of restricting sale of alcohol to persons over the age of 21 in Armadale on Friday and Saturday nights between 28th March 2008 and 3rd May 2008*, Lothian and Borders Police, Chief Inspector J. Baird, July 2008, p.5.
- ⁵⁸ *Changing Scotland's relationship with alcohol: a discussion paper on our strategic approach*, Scottish Government, June 2008, p.26, section 89.
- ⁵⁹ 'Action to Tackle Scotland's Drink 'Time-Bomb'', Scottish Government press release, June 17, 2008
- ⁶⁰ *Changing Scotland's relationship with alcohol: a discussion paper on our strategic approach*, Scottish Government, June 2008, p.27, section 92.
- ⁶¹ *Changing Scotland's relationship with alcohol: a discussion paper on our strategic approach*, Scottish Government, June 2008, p.26, section 89.
- ⁶² *Changing Scotland's relationship with alcohol: a discussion paper on our strategic approach*, Scottish Government, June 2008, p.26, section 87.
- ⁶³ *Changing Scotland's relationship with alcohol: a discussion paper on our strategic approach*, Scottish Government, June 2008, p.1.
- ⁶⁴ *Global status report: Alcohol policy*. (2004), World Health Organisation (WHO), (Geneva, Switzerland), 2004, Table 13, pp. 40-42
- ⁶⁵ *Global status report: Alcohol policy*. (2004), World Health Organisation (WHO), (Geneva, Switzerland), 2004, Table 13, pp. 40-42
- ⁶⁶ *Changing Scotland's relationship with alcohol: a discussion paper on our strategic approach*, Scottish Government, June 2008, p.25, section 86.

-
- ⁶⁷ *Global status report: Alcohol policy.* (2004), World Health Organisation (WHO), (Geneva, Switzerland) , 2004, Table 13, pp. 40-42
- ⁶⁸ *Global status report: Alcohol policy.* (2004), World Health Organisation (WHO), (Geneva, Switzerland), 2004, Table 13, pp. 40-42
- ⁶⁹ *Global status report: Alcohol policy.* (2004), World Health Organisation (WHO), (Geneva, Switzerland), 2004, Table 13, p. 41
- ⁷⁰ *Highlights on Health in France* (2004), World Health Organisation (WHO), 2004
- ⁷¹ *European health for all database* (HFA-DB), World Health Organisation
- ⁷² Tighe A. (Ed) (2007) *Statistical Handbook 2007*, Brewing Publications limited, 2007
- ⁷³ Wechsler, H., Lee, J.E., Kuo, M., Seibring, M., Nelson, T.F. & Lee, H. (2002). *Trends in college binge drinking during a period of increased prevention efforts: Findings from 4 Harvard School of Public Health College Alcohol Study surveys 1993-2001.* Journal of American College Health, 50(5), 203-217.
- ⁷⁴ See: <http://www2.potsdam.edu/hansondj/youthissues/1048680374.html>
- ⁷⁵ 'Marketing mania' by Jernigan, D. in *Multinational Monitor*, July/August 2008, p.24
- ⁷⁶ Johnston, L.D., O'Malley, P.M., Bachman, J.G. & Schulenberg, J.E. (December 21, 2006). *Decline in daily smoking by younger teens has ended.* University of Michigan News and Information Services: Ann Arbor, MI.
- ⁷⁷ United States, National Institutes of Health, National Institute on Drug Abuse, "Monitoring the Future Study, 1975 - 1996," 24 Oct. 1997, <http://165.112.78.61/NIDACapsules/NCMTFuture1.html> (25 Apr. 1998).
- ⁷⁸ *US 2006 National Survey on Drug Use and Health:*
<http://oas.samhsa.gov/nsduh/2k6nsduh/2k6Results.pdf>
- ⁷⁹ *US 2004 National Survey of Drug Use and Health*, Substance Abuse and Mental Health Services Administration (Office of Applied Studies) 2005
- ⁸⁰ 'Forbidden Fruit: or reasons why the drinking age should be lowered', in *Vermont Quarterly*, Winter 1999: 25 & 47, 1999.
- ⁸¹ 'Marketing mania' by Jernigan, D. in *Multinational Monitor*, July/August 2008, p.24
- ⁸² 'Forbidden Fruit: or reasons why the drinking age should be lowered', in *Vermont Quarterly*, Winter 1999: 25 & 47, 1999.

⁸³ 'Forbidden Fruit: or reasons why the drinking age should be lowered', in Vermont Quarterly, Winter 1999: 25 & 47, 1999.

⁸⁴ *Reducing Underage Drinking: A Collective Responsibility*. Institutes of Medicine, Washington: National Academies Press, 2003

⁸⁵ See: <http://www2.potsdam.edu/hansondj/youthissues/1053520190>

⁸⁶ See, for example:

- A news article from the USA referring to the 21-shot trend:

<http://media.www.districtchronicles.com/media/storage/paper263/news/2002/12/12/StudentLife/Students.Down.21.Shots.For.21st.Birthdays-341275.shtml>

- A Youtube video of a 21 year old downing 21 shots on their 21st birthday:
http://www.youtube.com/watch?v=1gm7O_C0Isk

⁸⁷ Engs, R. And Hanson, D. PhD. 'University Students' Drinking Patterns and Problems: Examining the Effects of Raising the Purchase Age' In *Public Health Reports*, November-December 1988, Vol. 103, No. 6.

⁸⁸ Engs, R. And Hanson, D. 'Reactance Theory: a Test with Collegiate Drinking', in *Psychological Reports*, 64:1083-1086, 1989

⁸⁹ Wechsler, H., Lee, J.E., Kuo, M. & Lee, H. (2000). *College binge drinking in the 1990s: A continuing problem (results of the Harvard School of Public Health 1999 College Alcohol Study)*. *Journal of American College Health*, 48(5), 199-210.

⁹⁰ 'Forbidden Fruit: or reasons why the drinking age should be lowered', in Vermont Quarterly, Winter 1999: 25 & 47, 1999.

⁹¹ See: <http://www2.potsdam.edu/hansondj/Youthissues/1046348726.html>

⁹² See: <http://www2.potsdam.edu/hansondj/Youthissues/1046348726.html>

⁹³ See: <http://www2.potsdam.edu/hansondj/Youthissues/1046348726.html>

⁹⁴ See: <http://www2.potsdam.edu/hansondj/Youthissues/1046348726.html>

⁹⁵ See: <http://www2.potsdam.edu/hansondj/Youthissues/1046348726.html>

⁹⁶ See: <http://www2.potsdam.edu/hansondj/Youthissues/1046348726.html>

⁹⁷ See: <http://www2.potsdam.edu/hansondj/Youthissues/1046348726.html>

⁹⁸ See: <http://www2.potsdam.edu/hansondj/Youthissues/1046348726.html>

⁹⁹ 'Marketing mania' by Jernigan, D. in *Multinational Monitor*, July/August 2008, p.23

¹⁰⁰ 'New Products for New Drinkers' by Wedekind, J. In *Multinational Monitor*, July/August 2008, p.25

¹⁰¹ 'New Products for New Drinkers' by Wedekind, J. In *Multinational Monitor*, July/August 2008, p.25

¹⁰² *Changing Scotland's relationship with alcohol: a discussion paper on our strategic approach*, Scottish Government, June 2008, p.26, section 87.

¹⁰³ National Highway Traffic Safety Administration (2005). Traffic safety facts: 2004 Data (DOT HS 809 905). Washington, DC: U.S. Department of Transportation. Retrieved May 1, 2006, from: <http://www.nrd.nhtsa.dot.gov/pdf/nrd-30/NCSA/TSF2004/809905.pdf>

¹⁰⁴ Glassbrenner, D. (2003). *Improving the Calculations of the Lives Saved by Safety Belts and Air Bags*, NHTSA Technical Report, DOT HS 809.

¹⁰⁵ See: <http://www.nysun.com/national/college-presidents-want-lower-drinking-age/84123/>

¹⁰⁶ See:

http://www.nytimes.com/2004/09/13/opinion/13mccardell.html?_r=1&n=Top%2fOpinion%2fEditorials%20and%20Op%2dEd%2fOp%2dEd%2fContributors&oref=slogin

¹⁰⁷ See: <http://www.chooseresponsibility.org>

¹⁰⁸ See: <http://www.youthrights.org/positionpapers.php#drinkingage>

¹⁰⁹ See, for example:

- 'Reduce the drinking age to 18' (122,541 members):

<http://www.new.facebook.com/group.php?gid=2207237471&refurl=http%3A%2F%2Fwww.new.facebook.com%2Fs.php%3Fref%3Dsearch%26init%3Dq%26q%3Ddrinking%2Bage>

- '10 Million people to lower the drinking age to 18' (115,592 members):

<http://www.new.facebook.com/group.php?gid=9285016286&refurl=http%3A%2F%2Fwww.new.facebook.com%2Fs.php%3Fref%3Dsearch%26init%3Dq%26q%3Ddrinking%2Bage>

¹¹⁰ See, for example:

<http://www.guardian.co.uk/world/2008/apr/18/usa>