

Liquor licensing consultation

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Liquor licensing laws in Northern Ireland - consultation

To Whom It May Concern

The British Medical Association (BMA) is an apolitical independent trade union and professional association representing doctors and medical students from all branches of medicine across the UK. Our mission is we look after doctors so they can look after you.

BMA believes the overarching objective of alcohol policy should be to reduce the total volume of alcohol across the population of the UK and that a comprehensive approach is required, involving a range of measures. Population measures are required to tackle the main drivers of alcohol consumption – accessibility and availability – as well as to address key influences such as alcohol marketing.

We welcome this opportunity to respond to the consultation on liquor licensing laws in Northern Ireland. We have limited our response to those areas applicable to expertise and general comments.

Availability of alcohol

A key driver of consumption is the availability of alcohol – the hours in the day it can be purchased as well as the number of outlets selling alcohol. There is comprehensive evidence that the more widely alcohol is available, the higher the levels of consumption and harm. Despite this, licensing legislation across the UK has been increasingly liberalised.

We believe that this highlights the need for a new approach to licensing, and this review provides the opportunity for the department to do this in Northern Ireland. The approach should be focused on reducing alcohol consumption and harm at a population level. Broadly this would focus on an overall

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reduction in licensing hours for on and off-licensed premises, as well as the total number of premises selling alcohol.

Licensing authorities need to consider the impact of licensing decisions on the health and wellbeing of the local population and should have the power to control the total availability of alcohol in their local area. This should be achieved by making public health a core objective and statutory obligation of licensing. While this is the case in Scotland, similar arrangements do not exist in Northern Ireland and we believe this consultation represents an opportune time to consider them.

Permitted hours/additional hours

Availability is a key driver in the consumption of alcohol, the number of hours it is available is a key component in that. There is comprehensive evidence that the more widely alcohol is available, the higher the levels of consumption and harm.

We believe that considering this evidence the department should carefully consider the potential impact of the increase in permitted/additional hours on the health of the population.

Restrictions on advertising in supermarkets and off-sales

Changes to licensing laws in the rest of the UK have focused on consumption in licensed premises, we welcome that this consultation addresses issues relating to off-sales and supermarkets too.

The discounting of alcohol in supermarkets has become a key driver of alcohol-related harm. Reduced price alcohol is a feature of this section of supermarkets, with a wide range of special offers that promote buying more alcohol. There are also a number of sales promotion strategies used to encourage consumers to purchase products – these include multi-buy promotions, end-of-aisle displays, in-pack premiums and special features. There is good evidence that these marketing techniques are effective. For example, end-of-aisle displays have been shown to increase sales of beer by 23%, wine by 33% and spirits by 46%.

In Scotland, price promotions based on bulk purchasing have been prohibited since October 2011. We believe this is a first step in changing attitudes to alcohol and removing incentives for consumers to purchase more alcohol than they intend.

We agree that restrictions should be placed on the alcohol advertisements in supermarkets and off-sales. However, we believe the department should consider going further than this and consider prohibiting promotions based on bulk purchasing of alcohol, as implemented in Scotland.

Codes of practice

BMA has been critical of industry led self-regulation, with evidence showing that this approach is flawed. Departmental approval of a code of practice would be an improvement, particularly if it could affect the granting/renewal of a liquor licence however the department need to be ready and willing to use their powers of enforcement.

However, our firm preference remains the implementation of a mandatory, independently regulated approach.

Self-service/Remote sales of alcoholic drinks

BMA believes that in those areas where innovations, such as self-service stations and remote sales of alcohol, are not covered by existing regulation/legislation it essential the department acts.

Access to alcohol using these methods is not subject to direct supervision, meaning premises cannot monitor consumption and those who would otherwise be refused service for a range of reasons can continue to access alcohol.

Additionally, these methods are likely to make access to alcohol easier for those aged under 18.

Minimum unit pricing

Whilst outside the scope of this consultation, and the department for communities, the BMA would once again like to put on record our call for the introduction of minimum unit pricing of alcohol. Evidence shows that minimum-unit pricing targets harmful drinkers, thus reducing health inequalities.

As differing pieces of alcohol policy fall across departments in Northern Ireland we believe that DfC should work with their colleagues in the department of health to progress this issue. Ideally, this would mean it would be ready to be actioned immediately by a minister when they are in place.

We would like to thank the department for progressing this important issue and for the opportunity to comment on the proposals. Should you have any questions relating to our response or if you would like to discuss it further with us please contact Jenna Maghie, senior policy executive via jmaghie@bma.org.uk or (028) 9026 9666.

Yours sincerely



Dr Tom Black
Chair of Northern Ireland Council