About CAMRA

Thank you for the opportunity to respond to this consultation.

CAMRA is a not-for-profit, volunteer-led organisation representing consumers. We have thousands of members in branches covering every part of Wales and over 140,000 members across the UK. We have been campaigning for pubs, pints and people since 1971.

If you have any questions about this submission or you would like to discuss our response, please do not hesitate to contact us on campaigns@camra.org.uk.

Response to consultation questions

**Question 1: Do you think minimum unit pricing should continue in Wales?**

CAMRA does not currently have a position on whether or not minimum unit pricing should continue in Wales.

However, we seek to ensure that a policy of minimum unit pricing operates in a proportionate and targeted way to prevent unnecessarily distorting the market or affecting those who consume alcohol moderately.

MUP does have the potential to help reduce the differential in prices between the on-trade and the off-trade, potentially encouraging consumers to drink in the regulated environment of their local pubs or social clubs, which is something CAMRA wants to see.

We realise that minimum unit pricing on its own is not enough to make pubgoing more attractive and financially viable. We acknowledge that many of the policy levers that would encourage moderate consumption in the regulated setting of the community pub currently lie with the UK Government, including on reducing costs for the pubs, social clubs and breweries through taxation and regulation.

However, we do believe that the Welsh Government should use every power at its disposal to support community pubs. If the Welsh Government decide to continue with a policy of minimum unit pricing, then they should set the unit price at an appropriate level to support pubgoing and regulated consumption in the on-trade rather than unregulated consumption of cheaper supermarket alcohol at home.

The Welsh Government’s publication *New modelling of alcohol pricing policies, alcohol consumption and harm in Wales: an adaptation of the Sheffield Tobacco and Alcohol Policy Model v2.6.0* shows that increasing minimum unit pricing to 65p would see a £14 million reduction in revenues for the on-trade. We strongly believe that any decision to increase the minimum unit price must be accompanied by other measures from the Welsh Government to support the beer and pubs sector deal with this reduction in revenues and to prevent further pub closures, which would force people to drink in the off-trade instead. This should include introducing a permanent lower business rates multiplier for pubs, social clubs and breweries in recognition of their community value.

The Welsh Government should make sure that any such review goes beyond just the public health impacts of the policy.  Research commissioned by CAMRA in the Friends on Tap report by Professor Robin Dunbar of the University of Oxford has found that people who regularly visit a local pub are happier, have more close friends and feel more engaged with their wider community. These wellbeing benefits should be reflected in Welsh Government policy, including on minimum unit pricing.

Introduction of minimum unit pricing will mean greater profits for retailers, primarily off-trade retailers and supermarkets in particular. The Welsh Government should continue to assess the scale of this increase in profits for retailers and consider how other policy measures could be used to promote responsible consumption in the on-trade without giving artificial increases to profits for large retailers like supermarkets.

In addition, we believe that the Welsh Government should consider the cumulative impact of its policies on the beer and pubs sector and factor this into any decisions on minimum unit pricing.

When a Deposit Return Scheme is introduced on cans and bottles, the combination of deposits and minimum unit pricing could see lower strength products like beer adversely affected compared to higher strength products. This needs to be thought through very carefully.

**Question 2: If minimum unit pricing continues, do you agree with a new level being set at 65p per unit?**

It is CAMRA policy that where minimum unit pricing is in operation it should be set at no more than 50p per unit and should not be increased by more than the rate of the Consumer Prices Index.

A minimum price set any higher than 50p per unit will be likely to impinge upon the on-trade and on those who drink responsibly – neither of which should be targets for this policy.

We anticipate that a minimum price of no more than 50p per unit will reduce the differential in prices between the on-trade and the off-trade, potentially encouraging consumers to drink in the regulated environment of the on-trade. However, an alternative scenario would be that consumers economise on visiting the pub so that they can afford to pay higher off-trade alcohol prices.

In Scotland where the minimum unit price was increased to 65p in 2024, there has started to be an impact for consumers on the price of some low ABV beers including traditional cask beers in pubs and social clubs. This should be considered before the minimum price is increased so that the Welsh Government can avoid the scenario where consumers economise on visiting the pub so that they can afford to pay higher prices for drinking at home.

**Question 3: What are your views on the likely impact of minimum unit pricing continuing and the price per unit increasing to 65p on particular groups of people, particularly those with protected characteristics under the Equality Act 2010? What effects do you think there would be?**

Increasing the minimum unit price beyond 50p is likely to impact on those who drink responsibly and those who drink in the regulated setting of the community pub or social club. We do not believe that these groups are the intended targets of this policy.

The Welsh Government’s publication *New modelling of alcohol pricing policies, alcohol consumption and harm in Wales: an adaptation of the Sheffield Tobacco and Alcohol Policy Model v2.6.0* shows that harmful drinkers purchase a fifth of their alcohol in the on-trade and four-fifths in the off-trade.

We believe that the Welsh Government should be encouraging the consumption of lower ABV drinks such as cask beer in the regulated setting of a pub or social club. The Welsh Government should avoid any decision which would lead to consumers moving away from consuming alcohol in the on-trade in order to afford higher prices in the off-trade.

We do not have any evidence that increasing the minimum unit price would impact specifically on those with protected characteristics under the Equality Act 2010.

**Question 4: What, in your opinion, would be the** **likely effects of the minimum unit pricing continuing and the price per unit increasing to 65p on the Welsh language? We are particularly interested in any** **likely effects on opportunities to use the Welsh language and on not treating the Welsh language less favourably than English.**

CAMRA does not have a view about how proposals would impact on the Welsh language.

**Question 5: In your opinion, could the proposals be formulated or changed so as to:**

* **have positive effects or more positive effects on using the Welsh language and on not treating the Welsh language less favourably than English**
* **mitigate any negative effects on using the Welsh language and on not treating the Welsh language less favourably than English?**

CAMRA does not have a view about how proposals would impact on the Welsh language.