

PORTMAN GROUP RESPONSE TO

Department and Health and Social Care: Advancing our health – prevention in the 2020s consultation

Executive Summary

- The Portman Group welcomes and fully supports the Department of Health and Social Care's (DHSC) aim to tackle the causes of preventable ill health, and we are committed to playing our part in helping to reduce the harms related to alcohol and promoting responsible drinking.
- The majority of drinkers in England drink responsibly within the Chief Medical Officers' lower risk guidelines, therefore interventions should be targeted at those who drink at the most harmful rate and place the greatest burden on healthcare resources.
- This will involve promoting efforts to spot problem alcohol use earlier and ensure better take-up and retention of existing addiction recovery services.
- Lessons can be learned from Walsall Healthcare NHS Trust's successful 'Managing Complex Patients Project', which featured a tailored multi-agency approach to tackle the underlying causes of problem drinkers, reduce alcohol-related admissions and save substantial healthcare costs.
- The Portman Group welcome DHSC's recognition of the potential of the low and no alcohol category to give consumers a wider array of choice of lower-strength products to help them practice responsible drinking.
- We also welcome the Department's intention to review the evidence on low and no product descriptors and believe that an update to the current system will help boost the category by giving consumers greater clarity and consistency around what they are buying, especially increasing the alcohol-free descriptor threshold from 0.05% ABV to 0.5% ABV in line with other European countries and the Licensing Act 2003.

The Portman Group

The Portman Group (PG) is the responsibility body for drinks producers in the UK.

Our role is to:

- Lead on best practice on alcohol social responsibility through the actions of our member companies;
- Regulate the promotion and packaging of alcoholic drinks sold or marketed in the UK through our Code of Practice (the 'Code');
- Challenge and encourage the industry to market its products responsibly.

The Portman Group is a not-for-profit organisation funded by eight member companies¹ who represent every sector of drinks production and collectively account for more than half the UK alcohol market.

The Portman Group welcomes and fully supports the Department of Health and Social Care's (DHSC) aim to tackle the causes of preventable ill health, and we are committed to helping reduce the harms related to alcohol and promoting responsible drinking. As such, we would welcome proportionate and evidence-led policy proposals targeted at those

¹ AB InBev, Bacardi Brown-Forman Brands, Carlsberg, Diageo, Heineken, Mast-Jagermeister UK Ltd, Molson Coors, Pernod Ricard

drinking at the most harmful levels and helping to promote lower-alcohol alternatives as part of a package to tackle alcohol-related harm.

Focusing prevention efforts on those who are drinking at the most harmful rates

1. As the DHSC already recognise in their paper, statistics show that the majority of people in England who choose to drink do so responsibly, with 74% drinking below the Chief Medical Officers' lower-risk drinking guidelines (excluding the 19% of adults who do not drink).² Further statistics show a general ongoing decline in alcohol consumption and irresponsible habits such as binge drinking across the overall population, as consumers drink less often and less to excess.³
2. We therefore believe that DHSC is right to highlight those drinkers who persistently drink at the most harmful levels and that interventions should be targeted at this minority, who are the most likely to develop health concerns and make repeat visitations to hospitals, putting a strain on healthcare resources.
3. These interventions should ensure that problem alcohol-use is spotted earlier and that those identified at risk are provided with appropriate interventions, ranging from health information, brief interventions with medical providers to access to addiction recovery services. Interventions should also tackle the complexities underlying their drinking as part of a multi-agency co-ordination.
4. Portman Group members, as well as the industry at large, are committed to continuing to fund and support the independent charity the Drinkaware Trust, which is working to reduce high risk drinking through targeted initiatives, such as the 'Drink Free Days' campaign focused on the over 45 age group.

Ensuring efforts are targeted, local and multi-agency

5. We believe that these interventions targeted at the most harmful drinkers are best implemented at the local level, and we would highlight the best practice lessons which can be learned from Walsall Healthcare NHS Trust's 'Managing Complex Patients Project', and how this can be replicated across the country in order to make better use of existing resources and tackle alcohol misuse.
6. The Project began in 2014 after the Trust identified 11 'frequent flyer' patients, who accounted for 499 alcohol-related hospital admissions over previous 12 months. Of this group, 7 had recognised alcohol abuse problems and 3 were of no fixed abode. To lower admissions and costs the Trust put together integrated care plans for the patients in co-operation with multiple health, social and lifestyle providers, which had previously been working in isolation from one another. Over the first phase of the project, the Trust was able to achieve an 81% reduction in A&E admissions, 65% reduction in hospital admissions and £75,012 in financial savings.⁴
7. After the successful initial trial, the four cohort phases implemented by the Trust covering 50 patients has so far resulted in £336,862 of savings, with £110,740 saved in A&E attendances and £226,122 saved by the reduction in bed stays. The Trust are currently in the process of initiating a fifth cohort.⁵

	A&E admissions	Bed days
Cohort 1 – 11 Patients (comparing 2014 to 2017)	73% reduction	89% reduction
Cohort 2 – 14 patients (comparing 2015 to 2017)	79% reduction	88% reduction
Cohort 3 – 13 patients (comparing 2016 to 2017)	54% reduction	68% reduction
Cohort 4 – 12 patients (comparing 2017/18 – 2018/19)	61% reduction	74% reduction

² <https://digital.nhs.uk/data-and-information/publications/statistical/health-survey-for-england/2017>

³ <https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/drugusealcoholandsmoking/datasets/adultdrinkinghabits> / <http://apps.who.int/gho/data/node.main.GISAH?lang=en>

⁴ <https://twitter.com/PortmanGroup/status/844876247641526272>

⁵ Latest figures kindly provided by Daniel Hodgkiss – Patient Safety Manager for Medicine and Long Term Conditions at Walsall Healthcare NHS Trust

8. We believe that the roll out of Alcohol Care Teams in hospitals with the highest number of alcohol-related admissions is an important step to reducing readmissions and tackling underlying issues and would like these more widely available and joined up with other services along the Walsall Model.

Increasing the availability of low and no alcohol products

9. We welcome DHSC's recognition of the potential of the low and no alcohol category to give consumers a wider array of choice of lower-strength products to help them drink responsibly. Our member companies share DHSC's desire to see this category grow "further and faster" and this is reflected in the substantial investments made to increase the range of products on the market and their widespread availability.⁶
10. We are keen to work in partnership with DHSC to achieve its goal of delivering a significant increase in the availability of alcohol-free and low-alcohol products by 2025 and to help the UK become a global leader in the low and no category.
11. We also welcome DHSC's intention to review the evidence on low and no product descriptors and believe that an update to the current system will help boost the category by giving consumers greater clarity and consistency around what they are buying.
12. Our own research and experience show that both consumers and producers find the current low alcohol descriptors confusing.
13. For example, a 2018 YouGov poll⁷ commissioned by the Portman Group found that:
- a. When consumers were asked if it would be clearer to have one term to define a category containing no more than 0.5% ABV, 68% answered that one term would be clearer.
 - b. 84% of consumers polled were not familiar with the descriptor 'de-alcoholised', and 75% found the term confusing.
 - c. 65% think it is important that consumers are made aware if a product had once contained alcohol, even if it had been removed from the final product.
14. Therefore, our specific asks to introduce greater consistency and clarity for low and no alcohol product descriptors are:
- a. **Alcohol free:** Raising the 'alcohol free' threshold from 0.05% ABV to 0.5% ABV to bring the UK in line with other European countries and the definition of 'alcohol' in the 2003 Licensing Act.
 - b. **Low alcohol:** Introducing a minimum strength of above 0.5% ABV to the category of 'low alcohol', to go up to and include 1.2% ABV.
 - c. **Removing the term 'de-alcoholised'**, as our previous research has shown that consumers find this confusing. Products should still communicate if alcohol has been extracted from the final product, but need not do so through the descriptor on the front label.
 - d. The term **non-alcoholic** is already widely used and should be permitted broader use to apply to all products below 0.5% ABV.
 - e. Products above 1.2% are required by law to display ABV. We would encourage all producers to include ABV for products below 1.2% to help consumers understand what they are purchasing.
 - f. We would encourage the UK Government to seek UK-wide agreement on low and no descriptors, to avoid more confusion and inconsistency across the devolved nations.
15. In support of raising the alcohol-free threshold to 0.5% it is worth understanding how alcohol is metabolised. It is well documented that the average person breaks down alcohol at a rate of approximately one unit per hour,

⁶ Examples of Portman Group member company investments to increase the availability of low and no alcohol products can be found in the Annex.

⁷ YouGov polling: All figures, unless otherwise stated, are from YouGov Plc. Total sample size was 2048 adults. Fieldwork was undertaken between 24th - 25th April 2018. The survey was carried out online. The figures have been weighted and are representative of all GB adults (aged 18+).

depending on factors such as weight, height and gender.⁸ At 0.5% ABV, it would be necessary to consume two litres of liquid within an hour (i.e. six standard beer bottles or 2.66 bottles of wine) to reach a total intake of one UK unit of alcohol; and, by the time enough liquid had been consumed to equate to one unit, the process of metabolising the alcohol already consumed would be underway. Drinking any liquid at this rate or faster would be physically difficult and potentially dangerous. The Government's Eatwell Guide recommends drinking 6-8 glasses of liquid a day, equivalent to just 1.2 litres.⁹ It is therefore reasonable to assume that an average individual would not, and could not, consume two litres of liquid per hour, which is what would be required for the alcohol to stay in the bloodstream.

16. The proposed definition of alcohol-free should also be considered in context of other specific groups who may be actively seeking to avoid alcohol such as pregnant women, recovering alcoholics, religious groups who cannot consume alcohol, and drivers. Any product that can ferment produces alcohol as it ripens/matures. Therefore, products like fruit juices, botanically brewed beverages, vinegar and leavened bread can contain a higher ABV than 0.05% - the current alcohol-free descriptor. The inconsistency applied to alcohol-free products in comparison to soft drinks and food stuffs demonstrates that there is a case for the definition threshold to be raised. There are botanically brewed products, such as lemonades, containing up to 0.5% ABV, and yet they do not have to describe themselves as an alcohol product. If the alcohol content of the lemonade in this scenario is deemed to be safe and/or suitable for certain groups, then it should follow that any product of no more than 0.5% ABV should be considered suitable and safe, including those described as alcohol-free at 0.5%.
17. Most products in this potential alcohol-free category, including soft drinks and food stuffs, can never be entirely free of all alcohol but in light of the way trace alcohol is metabolised, as outlined above, we consider that most consumers would consider this a reasonable definition if presented with all the information in context.
18. We believe there exists a deep issue with public understanding of the current alcohol descriptors. We believe that consumers would be receptive to the 'up to and including 0.5% ABV' alcohol-free definition if this were presented alongside the alcohol content of every day food stuffs, soft drinks, hygiene products and information on the rate at which the body metabolises alcohol at this level.

**Portman Group
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⁸ <https://www.drinkaware.co.uk/alcohol-facts/alcoholic-drinks-units/what-is-an-alcohol-unit/>

⁹ <https://www.nhs.uk/live-well/eat-well/the-eatwell-guide/>

Annex – Examples of Portman Group member company investments to make low and no alcohol products more accessible

- **Bacardi** has launched an alcohol-free sparkling drink under its popular Martini brand – ‘Martini 0.0% Dolce’.
- **Budweiser Brewing Group** has a commitment that no and low beer products will represent at least 20% of its global beer volumes by the end of 2025.
- **Carlsberg** aim to offer an alcohol-free alternative wherever its alcoholic options are sold by 2022.
- **Diageo** has invested in non-alcoholic drinks company Seedlip and launched an ultra-low Gordon’s Gin & Tonic flavoured drink in the UK.
- **Heineken** has partnered with Club Soda to support mindful drinking festivals and plan to roll out Heineken ® 0.0 draught beer to 1,500 pubs through its Blade countertop draught system.
- **Molson Coors** already offer UK consumers a range of no/low products and aims to offer these products in all countries in which it has a presence by 2025.
- **Pernod Ricard** has launched non-alcoholic premium drink Ceder’s in the UK, the company’s first non-alcoholic alternative to gin.