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generally sold in large 2-3 litre bottles. This means it is not uncommon for people to either buy 3 litres as they feel this is more cost effective. Or, if they are trying to reduce their intake they struggle as they cannot buy smaller bottles and end up buying the larger size and inevitably consume the whole bottle.

Le *Frosty Jacks* and *Omega*, Brookfield
Diamond White and *White Star*.

1.2. Due to anomalies in the tax system, these drinks are the cheapest products on the market on a per unit basis, with 3 litre bottles containing as much alcohol as 22 shots of vodka available for as little as £3.49. As a result, they are overwhelmingly favoured by those seeking alcohol at the cheapest possible price – often, vulnerable people who are homeless and or underage drinkers, chronically dependent drinkers as well.

1.3. Over the past twenty years, white ciders have gained increasing prominence as services patients in Glasgow and Edinburgh drink white cider, and of these 45% drink it exclusively.¹ An Alcohol Concern survey has found that 50% of homeless white cider drinkers drink more than 3 litres a day, with 42% of respondents saying they have drunk it for more than 10 years².

Thames Reach³, which works with rough sleepers in London, suggest that super-strength drinks are doing more damage than both heroin and crack cocaine. The charity state that; 78% of the deaths in Thames Reach hostels are attributed to high strength alcohol and claim it is the biggest cause of premature death of homeless people in the UK.,

High strength cider plays a particularly damaging role in the consumption patterns of dependent them to maintain their level of consumption even through financial setbacks.⁴ Increasing the price of high-strength cider would to some extent remove this fallback, and so encourage dependent harmful drinkers to cut down when their money begins to run out. The size of cider bottles contributes to this harm – as one homele how much white cider some people do drink because after three, three litre

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1.4. White ciders, particularly *Frosty Jacks*, have been consistently found to be among the top drinks chosen by young people who are known to have alcohol-related problems.⁶ Young people select these products due to their cheapness,

¹ Black, H. et al (2014) *White Cider Consumption and Heavy Drinkers: A Low-Cost Option but an Unknown price*. Alcohol and Alcoholism 49:6, pp675-80

² Goodall, T. (2011). *White Cider and Street Drinkers: Recommendations to reduce harm*. London: Alcohol Concern.

³ Thames Reach (2017), Calls for high-strength cider duty increase. Available from: < <http://www.thamesreach.org.uk/news-and-views/calls-for-high-strength-cider-duty-increase/>> [Accessed 23 March 2017]

⁴ Black, H. et al, *op. cit.*

⁵ Goodall, T. *op.cit.*

⁶ See, for example: Alcohol Concern (2015). *Alcohol brands consumed by young people in treatment 2015*. Available at http://www.alcoholconcern.org.uk/wp-content/uploads/2015/06/Alcohol-Brands_Young-People.pdf; Alcohol Concern (2013).



committed to raising tax on white cider.¹¹ The Institute for Fiscal Studies has recommended action be taken on low levels of duty charged on strong¹² and has proposed that the optimal rate of cider duty (averaged across

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products, and encourage others to be reformulated. A wide band would potentially increase the scale of reformulation, and so deliver greater benefits.

- 2.2 Reformulation of strong white ciders should not be the main policy objective we feel this is likely to result only in modest changes to products and to levels of alcohol consumption. Raising the price of high strength cider, particularly if the increase were substantial, has the potential to radically alter the structure of the alcohol market. Since high strength cider is the cheapest product on the market by some distance, a meaningful increase in its price would significantly reduce the amount of alcohol that is affordable to dependent drinkers, and so reduce their consumption. A also more amenable to incremental monitoring and adjusting policy over successive Budgets, since it is easier to adjust duty rates than duty bands. The wider duty band would have the double benefit of tackling white cider, but also encouraging the reformulation of certain mainstream products.

A wider duty band would effectively target the most harmful products on the market with minimal effects on more mainstream products. The most popular ciders are typically 4-5% ABV although there are a small number of mainstream products that are in the 5-6% range, these should be close enough to the boundary to be encouraged to reformulate to lower strength by a wide band.

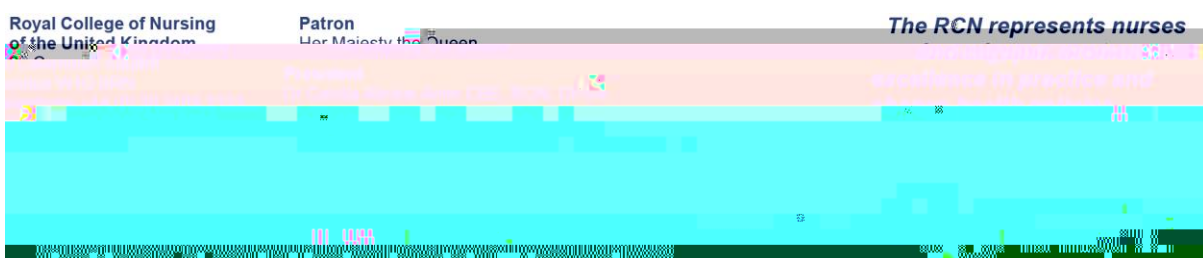
- 2.3 As important as setting the right threshold is ensuring that the duty rate is set appropriately. To significantly reduce white cider consumption, the duty rate must be significantly increased. A guide for setting a new white cider duty rate could be the current rate applied to beer of similar strength (as noted, 7.5% ABV cider duty is currently a third of beer duty).
- 2.4 As a general principle, we hope that the government will seek to ensure that products in higher strength duty bands are always charged a higher rate of duty than those in lower strength duty bands.

This principle has implications for the 7.5-8.5% duty band as well. 8.5% cider is currently taxed at 7.2p per unit. Should the new proposed rate of duty on 7.5% cider exceed this level, we would expect the duty on 8.5% cider also to rise, so as to ensure the top rate of duty remains the highest. It would clearly be counterproductive if the new band were to encourage the production of ciders over 7.5% ABV because increases in duty in this category did not keep up with reforms elsewhere.


3. In volume terms, how does the still cider market breakdown by strength in 0.1% abv increments?

- 3.1 Based on the analysis from


of all cider sales in England, and 21% of all sales in Scotland in 2015.




Moreover, because mainstream high strength ciders are much more expensive than white ciders, a duty increase would have a smaller impact




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believe there are insufficient lower (and non-alcoholic) drinks available to buy in shops and pubs.⁵¹ They also find that that 44% of drinkers would be interested in lower alcoholic drinks if they were noticeably cheaper than standard strength variants. Given that low alcohol wine is thought to be expensive to make,⁵² it is possible that the proposed new tax band could facilitate such a price differential

drinkers not increasing their consumption. The net health effects of a new band of duty on lower strength wine are ambiguous, but potentially positive.

10. If the government decides to introduce a new still wine band, should the new duty band also be applied to still made-wines?

Nothing to add.

11. What impacts would a new still made-wine band have?

Nothing to add.

12. Do you think introducing a new still wine and made-wine band could create adverse incentives for producers to increase their alcohol strength of some of their drinks? If so, how large an effect would you expect this to be?

Nothing to add.

13. Are there any other factors that the government should consider in relation to a new duty band for wine and made-wine?

13.1 Care would need to be taken around the labelling of wines within this duty band.

wines, would be potentially misleading to consumers who may mistakenly believe that they are drinking lower amounts of alcohol than the reality, and which could result in adverse health consequences, drink driving and so on. This is particularly relevant given that nearly 30% of regular wine drinkers in the UK are not aware of the alcohol level in their typical bottle of wine.⁵⁷

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⁵⁷ Wine Intelligence (2012), op. cit.

