



## **ACS Submission: Consultation on setting the minimum price of alcohol beyond 2026**

ACS (the Association of Convenience Stores) welcomes the opportunity to respond to the Welsh Government's consultation on setting the minimum price of alcohol beyond 2026. ACS is a trade association representing over 3,064 convenience stores in Wales which provide employment for 26,000 people and make a valuable contribution to local communities. Our members include the Co-Op, One Stop, Nisa Local, Costcutter and thousands of independent retailers.

We acknowledge the Welsh Government's objective to tackle alcohol-related harm and as a sector we are committed to working with the Welsh Government to ensure the responsible retailing of alcohol. We have demonstrated a robust record of compliance with the regulatory requirements placed on retailers selling alcohol, and appreciate that this has been recognised by the independent evaluation reports commissioned by the Welsh Government which acknowledges the high levels of compliance shown by retailers when selling alcohol at minimum pricing levels.

We and our members are also actively involved in a number of voluntary initiatives that prevent alcohol related harm, including being founding members of Community Alcohol Partnerships, an initiative which encourages partnership working between retailers, local enforcement authorities and communities to prevent underage sales. There are currently over 300 community alcohol partnerships across the UK, many of which engage with our retail members to tackle alcohol related harm issues in local communities. We are also a founding board member of the Proof Age Standards Scheme (PASS).

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

Yes.

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

Unsure.

ACS has not conducted any analysis that could indicate the right minimum unit price for alcohol in the future. The introduction of MUP Wales in 2020 at 50pence per unit (PPU) had limited impact on convenience retailers as alcohol sold in convenience stores was above the 50ppu MUP rate.

Based on feedback from our members, the main impact of MUP since 2020 are small changes in the range of alcohol products sold in stores. As anticipated, the range of higher strength alcohol products has been most impacted by MUP, as customers have shifted their purchasing behaviours to other alcohol products.

We acknowledge the independent evaluations commissioned by the Welsh government which suggest the implementation of MUP has resulted in shifts in consumer preferences towards other alcoholic beverages and led to a reduction in strong, cheap alcohol sales. The Welsh Government should take a cautious approach to increasing MUP rate and it must be kept under constant review. Harmful alcohol consumption is a complex issue that is best dealt with by treating the individual not blunt population level interventions.

If the Welsh Government decides to continue and increase minimum unit pricing, it needs to ensure changes to the policy is effectively implemented by working with retailers on the following issues:

### **Fair implementation periods and timing**

- ACS acknowledges in the consultation it states that if the Welsh Government decide to continue MUP and increase it there is a stated ambition to lay draft regulations early 2026 and for the regulations to come in effect after March 2026.
- We would highlight that the Welsh Government also intends to implement restrictions on the promotion and location of products high in fat, salt and sugar on March 26<sup>th</sup> 2026 and there will also be new UK-wide restrictions on the unit pricing of products from 6<sup>th</sup> April 2026 for stores with floor space above 3,000 square feet.
- Feedback we have received from members who impacted by these changes have raised concerns regarding the expected policy timeline to implement these changes to their ranged lines and for colleagues to ticket shelf edge labels to be displayed in store. Stores during this period will not only be implementing pricing changes at the time but contending with promotional and store refitting changes too which will inevitably place strain on workforce capability and IT systems.
- It is also concerning that if the Welsh Government continue implementing MUP and raise it, we are hypothetically 7 months away from the regulations coming in effect and yet we are still in the consultation period.
- Whichever decision is made, ACS would urge the Welsh Government to engage as proactively as possible with the business community to ensure it can prepare and implement necessary changes.

### **Cross-Border Impact**

- We would highlight further concerns raised by members regarding changes in consumer behaviour resulting from increases to the minimum unit price (MUP), particularly for customers living near the Welsh–English border. Members suggest that raising MUP could create a competitive disadvantage for stores in Wales located close to the border, as customers may be incentivised to cross into England where MUP does not apply if the potential savings are significant.
- We would also welcome clarity on the position of online retailers delivering into Wales. For example, is it currently legal for an online seller to offer alcohol below the minimum unit price provided that the product is dispatched from outside Wales? These are the types of questions our members have and could be addressed when new guidance is issued and communicated.

### **Government lead public awareness campaigns**

- Government must lead communications activity, in partnership with industry, to ensure customers understand changes and that retailers are increasing prices in line with government policy.

#### **Updated guidance for retailers**

- If the Welsh Government decides to continue with MUP and increases it to 65p, new and updated guidance must be produced as soon as practically possible to help retailers understand how changes to the policy will impact the unit price of alcohol products they sell and how they can calculate the minimum unit price of an impacted alcohol drink.

**For further information on this submission please contact [daniel.askew@acs.org.uk](mailto:daniel.askew@acs.org.uk)**