



City of Hamilton Report for Consideration

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| To: | Chair and Members Public Health Sub-Committee |
| Date: | April 28, 2025 |
| Report No: | BOH25008 |
| Subject/Title: | Municipal Alcohol Policy Update 2025 |
| Ward(s) Affected: | (City Wide) |

Recommendations

- 1) That the revised Municipal Alcohol Policy (2025), attached as Appendix “A” to Report BOH25008, **BE APPROVED**.

Key Facts

- The purpose of the report is to provide an overview of the changes to the revised Municipal Alcohol Policy (2025);
- This report is written in response to direction received from the Board of Health on December 2, 2019, to provide recommendations for updating the Municipal Alcohol Policy (2011);
- The existing Municipal Alcohol Policy, last updated in 2011, required updating to reflect the current evidence on the harms associated with alcohol use, strategies to reduce alcohol-related harms, and changes to alcohol legislation and policy; and,
- Updates to the Municipal Alcohol Policy (2025) reflect these changes and prioritize the public health and safety of residents, event patrons, and City staff.

Financial Considerations

Not Applicable.

Background

At its meeting on December 2, 2019 the Board of Health approved the initiation of a review of the Municipal Alcohol Policy (2011), including the formation of a Workgroup made up of relevant municipal departments, and also directed Public Health Services to report back to the Board of Health with recommended updates to the Municipal Alcohol Policy (2011) by Q3 2020. This activity was put on hold in 2020 due to Public Health Services' role in the COVID-19 Response, and was reprioritized in 2023.

Analysis

What is a Municipal Alcohol Policy?

A municipal alcohol policy is a tool that aligns with provincial liquor laws and supports municipalities by outlining safe and appropriate use of alcohol on municipal properties. Municipal alcohol policies provide terms and conditions for the sale, service, and consumption of alcohol at events held on municipal properties and can provide a centralized framework for local alcohol policies. Municipal alcohol policies are part of a comprehensive, evidenced-based approach to alcohol policy, strengthening provincial regulation while tailoring policy to the local context. Municipal alcohol policies demonstrate a community's commitment to safety and well-being and minimize City liability.

Review of the 2011 Municipal Alcohol Policy:

In October 2023, the Municipal Alcohol Policy Work Group, led by Public Health Services and Recreation, with representation from Planning and Economic Development, Public Works, and Corporate Services, was formed to evaluate, plan, and revise the 2011 Municipal Alcohol Policy. The proposed revisions to the 2011 Municipal Alcohol Policy (attached as Appendix "A" to Report BOH25008) include a prioritization of the health and safety of the public and reflect evidence-based strategies to reduce alcohol-related harms. The policy was influenced and informed by several important contextual factors, including:

- **New Evidence of the Harms Associated with Alcohol Use:**

Alcohol is often associated with relaxation and celebration, but also has significant costs to individuals and society. Recent research shows that even small amounts of alcohol can harm health. Beyond the well-established risks of alcohol consumption – such as violence, motor vehicle crashes, injury, and death – new evidence shows that even low-to-moderate drinking is associated with conditions such as heart disease, stroke, and seven types of cancer.¹

- **Impact of Alcohol Locally:**

In Hamilton, alcohol is a commonly used substance and is a major cause of

¹ Paradis, C., Butt, P., Shield, K., Poole, N., Wells, S., Naimi, T., Sherk, A., & the Low-Risk Alcohol Drinking Guidelines Scientific Expert Panels. (2023). Canada's Guidance on Alcohol and Health: Final Report. Ottawa, Ont.: Canadian Centre on Substance Use and Addiction.

morbidity and mortality. In an average year, it's estimated that alcohol causes 208 deaths, 1,073 hospitalizations, and 9,123 emergency department visits among Hamilton residents.²

- **Changing Provincial Legislation and Alcohol Policy Landscape:**

Over the last decade, there has been a gradual shift in Ontario away from alcohol policies that have been proven to reduce the harms associated with alcohol consumption. In 2019, the *Liquor Licence Act* was replaced with the *Liquor Licence and Control Act*, which has implications for events with alcohol held on municipal property. The *Liquor Licence and Control Act* extended alcohol service hours, lowered retail prices, allowed alcohol-only events (i.e., food is no longer required), changed physical barrier requirements, and the created a new category of Special Occasion Permits for Tailgate Events. These changes increase the accessibility of alcohol and negate evidence-based strategies designed to reduce the risks of alcohol over consumption. Additionally, recent efforts to modernize alcohol availability in Ontario – such as alcohol sales in gas stations, convenience stores, and grocery stores, reduced taxation, and relaxed delivery regulations – further expand access to alcohol in the community, increasing the potential for harm. Research consistently shows that increasing the availability of alcohol is associated with higher rates of alcohol consumption and alcohol-related harm, including accidents, injuries, violence, crime, and chronic health conditions.^{3,4}

Maintaining an evidence-based Municipal Alcohol Policy is an opportunity for the municipality to maintain and strengthen local alcohol policy and improve public health and safety in Hamilton.

Updates to the Municipal Alcohol Policy (2025):

The revised Municipal Alcohol Policy (2025) prioritizes public health and safety and integrates evidence-based practices to reduce alcohol consumption and related harms. Key updates include:

1. Revised Goals:

The goal of the Municipal Alcohol Policy (2025) has been updated to focus on

² Hamilton Public Health Services. Hamilton's Community Health Status Report. Hamilton: City of Hamilton; 2024.

³ Babor, T. F., Caetano, R., Casswell, S., Edwards, G., Giesbrecht, N., Graham, K., Grube, J. W., Hill, L., Holder, H. D., Homel, R., Livingston, M., Mäkelä, P., Österberg, E., Rehm, J., Room, R., & Rossow, I. (2023). *Alcohol: No ordinary commodity - Research and public policy* (3rd ed.). Oxford University Press.

⁴ Sherk, A., Stockwell, T., Chikritzhs, T., Andréasson, S., Angus, C., Gripenberg, J., & et al. (2018). Alcohol consumption and the physical availability of take-away alcohol: Systematic reviews and meta-analyses of the days and hours of sale and outlet density. *Journal of Studies on Alcohol and Drugs*, 79(1), 58-67.

<https://doi.org/10.15288/jsad.2018.79.58>

promoting healthy, safe, and enjoyable environments for both City staff and the public and supports the City's vision to be the best place to raise a child and age successfully. This is a departure from the operational goals of the previous Municipal Alcohol Policy (2011) that focused primarily on educating event organizers on their responsibilities for hosting an event and on advising event organizers and City staff on the processes and requirements for approving an event on City property. While these remain objectives of the revised policy, the new goals situate the Municipal Alcohol Policy (2025) as a tool to achieve corporate objectives and improve public health and safety.

2. Evidence-based measures to enhance public health and safety at events with alcohol:

The Municipal Alcohol Policy (2025) continues to incorporate evidence-based measures to enhance public health and safety at events with alcohol, as well as mitigate risks and liability for the City and the event organizer. These measures include:

- Maintaining the current policy's hours of alcohol sales that start at 11:00 a.m.;
- Maintaining and establishing new alcohol service requirements that promote low risk drinking, such as, requiring food to be available, prohibiting energy drinks, and requiring water and other non-alcoholic beverages to be sold for less than the cost of alcohol;
- Establishing a risk-based approach to evaluating events with alcohol that assesses event criteria and allows for additional event terms and conditions to mitigate risk. This approach aims to maintain lower requirements for low-risk events while allowing the higher-risk events to continue with appropriate controls to mitigate risk; and,
- Establishing a new clause that prohibits Tailgate Events on municipal properties. A Tailgate Event is a Public Event that is held in connection with and in proximity to a live professional, semi-professional, or post-secondary sporting event, and where attendees 19 years of age or older may bring their own alcohol for consumption within a permitted area. Tailgate Events pose an increased risk for both event organizers and municipalities due to the difficulty in monitoring alcohol service and consumption. This raises concerns for public health and safety, particularly the increased risk of underage drinking.

3. Clearer Definition of Roles and Responsibilities:

The Municipal Alcohol Policy (2025) has been updated to clarify the roles and responsibilities of all stakeholders, including event organizers, City staff, and the public regarding the sale, service, and consumption of alcohol on City property. This approach aims to enhance awareness and understanding of roles, and to enhance consistency in policy implementation across City departments. Emphasis is placed on ensuring event organizers are aware of their responsibilities when hosting events on City property, including compliance with

the *Liquor Licence and Control Act*, and the Municipal Alcohol Policy (2025).

4. Updated Designated Properties List

The Designated Properties List has been updated to include new municipal properties eligible for events with alcohol, such as rooms within Bernie Morelli Recreation Centre. It has also been updated to remove facilities where events with alcohol are not permitted, including municipal service centres such as Hamilton City Hall.

5. Expanded scope to create a centralized framework for municipal level alcohol policies:

The Municipal Alcohol Policy (2025) has been updated to incorporate additional municipal-level alcohol policies, including illegal alcohol consumption and alcohol advertising on City property. This update creates a comprehensive and centralized framework for municipal-level alcohol policies and ensures they are aligned with common goals and objectives.

- **Illegal alcohol consumption on City property:**

Illegal alcohol consumption on City property contributes to the normalization of alcohol use, making it appear routine and socially acceptable. This can lead to increased alcohol consumption, especially among youth. Illegal alcohol consumption on City property also presents a potential liability for the City and can pose risks to public health and safety, as consumption occurs without oversight or regulation.

To address these concerns, the Municipal Alcohol Policy (2025) has been updated to reinforce that consuming alcohol on City property without a licence or a permit is illegal. The revised policy defines illegal alcohol consumption and specifies areas where alcohol consumption is not permitted, including dressing rooms, recreation facilities, sports fields, municipal streets and parking lots, parks, beaches, and areas outside of the designated service area at events with alcohol.

The Municipal Alcohol Policy (2025) aligns with the RZone Respectful Environments Policy and Procedures, which outline clear steps for event organizers, City staff, and the public to respond to illegal alcohol consumption on City property.

- **Alcohol Advertising on City Property:**

There is well-established evidence linking alcohol advertising to alcohol consumption and related harms. Exposure to alcohol advertising increases acceptability and normalization of alcohol use, encourages early initiation of drinking, promotes high-risk behaviours such as binge-drinking, and increases alcohol consumption and related harms for all age

groups, but particularly among youth.^{5,6} To reduce the harms associated with alcohol advertising, the revised Municipal Alcohol Policy (2025) includes broader restrictions and guidelines than the previous version, which focused on limiting alcohol advertising at youth-focused events on City property. The revised policy has been updated to prohibit alcohol advertising on all City property, except at the following places and events:

- Events with Special Occasion Permits or Caterer's Endorsements not targeted to youth;
- Premier entertainment venues (e.g., Tim Horton's Field, FirstOntario Centre, FirstOntario Concert Hall, Hamilton Convention Centre); and,
- City Properties with an Alcohol and Gaming Commission of Ontario-issued Liquor Sales Licence.

Advertising at exempt locations and events must comply with the Alcohol and Gaming Commission of Ontario's liquor advertising policies and guidelines.

Municipal Alcohol Policy (2025) Implementation and Evaluation

The implementation of the revised Municipal Alcohol Policy (2025) will begin, following policy approval from Hamilton City Council. This process includes targeted communications to key stakeholders, such as event organizers and City staff, as well training for City staff involved in the policy's implementation. To allow adequate time for communications and training, and to minimize disruptions to events already planned under the Municipal Alcohol Policy (2011), enforcement of the revised policy will take effect on October 1, 2025.

An evaluation of the impacts and implementation of the Municipal Alcohol Policy (2025) will be conducted following policy implementation. The evaluation results will be used to inform ongoing improvements and future revisions of the policy.

Legal Implications/Legislated Requirements:

Legal and Risk Management Services has identified that the updated alcohol advertising restrictions in the Municipal Alcohol Policy (2025) could be viewed by potential advertisers as an infringement on freedom of expression under the Charter of Rights and Freedoms. The risk is perceived to be low.

Corporate Policy Implications:

The Municipal Alcohol Policy (2025) prohibits alcohol advertising on all City property with exceptions for events with Special Occasion Permits or Caterer's Endorsements that are not youth-focused, at premiere entertainment venues, and on City properties

⁵ Babor, T. F., Caetano, R., Casswell, S., Edwards, G., Giesbrecht, N., Graham, K., Grube, J. W., Hill, L., Holder, H. D., Homel, R., Livingston, M., Mäkelä, P., Österberg, E., Rehm, J., Room, R., & Rossow, I. (2023). *Alcohol: No ordinary commodity - Research and public policy* (3rd ed.). Oxford University Press.

⁶ Public Health Ontario, Giesbrecht, N., & Wettlaufer, A. (2016). *Focus on: Alcohol marketing*. Queen's Printer for Ontario.

with an Alcohol and Gaming Commission of Ontario-issued Liquor Sales Licence. This expands on the City's Policy for Commercial Advertising and Sponsorship (2008) which stipulates that "all advertising and sponsorships shall not, either directly or indirectly... (c) advertise the purchase of alcoholic beverages or promote the use of alcohol by those younger than the legal drinking age" to include a more encompassing approach that prohibits all alcohol advertisement on City property.

Results of Consultations:

Extensive consultations were conducted to inform the revision of the Municipal Alcohol Policy (2025). The revised Municipal Alcohol Policy (2025) reflects the discussions had internally at the City of Hamilton and with external partners.

Alternatives

Should the Committee not wish to approve the staff recommendation in Report BOH25008, the Municipal Alcohol Policy (2011) will remain in effect.

Relationship to Council Strategic Priorities

The recommendations in this report support the following 2022-2026 Council Priorities, Outcomes, and Measures of Success:

2. Safe & Thriving Neighbourhoods
 - 2.2. Make sure people can safely and efficiently move around by foot, bike, transit or car
 - 2.3. Provide vibrant parks, recreation and public space
3. Responsiveness & Transparency
 - 3.1. Prioritize customer service and proactive communication

The revised Municipal Alcohol Policy (2025) aims to enhance healthy, safe, and enjoyable environments to support the City's vision to be the best place to raise a child and age successfully. This includes mitigating risks at events with alcohol on City property, including the promotion of safe transportation options, and ensuring healthy public spaces that can be enjoyed by everyone.

The Municipal Alcohol Policy (2025) also aims to ensure continued use of City property for events with alcohol and ensures event organizers are aware of their roles and responsibilities for hosting events.

Previous Reports Submitted

- [BOH19032](#) - **Municipal Alcohol to Reduce Harms Associated with Alcohol** Report in response to July 2019 Board of Health direction for Public Health Services to report back on municipal actions to reduce harms from alcohol consumption.

- [CS10025](#) – **Municipal Alcohol Policy**
Report to approve the Municipal Alcohol Policy and Operating Standards and Procedures.

Consultation

Municipal Alcohol Policy Work Group members and directors

The following individuals participated on the Municipal Alcohol Policy Work Group and/or were involved in the Municipal Alcohol Policy approval process:

City of Hamilton, Corporate Facilities and Energy Management, Public Works

- Dean Urciuoli, Supervisor Facilities and Technical Services, Corporate Facilities and Energy Management, Public Works
- Chris Herstek, Director Corporate Facilities and Energy Management, Corporate Facilities and Energy Management, Public Works

City of Hamilton, Environmental Services, Public Works

- Kara Bunn, Manager Cemeteries, Environmental Services, Public Works
- Cynthia Graham, Director Environmental Services, Environmental Services, Public Works

City of Hamilton, Legal and Risk Management Services, Corporate Services

- Gavin Chamberlain, Corporate Risk Compliance Officer, Legal and Risk Management Services, Corporate Services
- Kaush Parameswaran, Deputy City Solicitor, Legal and Risk Management Services, Corporate Services

City of Hamilton, Licensing and Bylaw Services, Planning and Economic Development

- Tiffany Gardner, Manager Licensing, Licensing and Bylaw Services, Planning and Economic Development
- Dan Smith, Director Licensing and Bylaw Services, Licensing and Bylaw Services, Planning and Economic Development
- Monica Ciriello, Director Licensing and Bylaw Services, Licensing and Bylaw Services, Planning and Economic Development

City of Hamilton, Recreation, Healthy and Safe Communities

- Dawn Walton, Manager Business Support, Recreation, Healthy and Safe Communities
- Steve Sevor, Director Recreation, Recreation, Healthy and Safe Communities

City of Hamilton, Tourism and Culture, Planning and Economic Development

- Kenda Capon, Supervisor Museum Operations – Heritage Sites, Tourism and Culture, Planning and Economic Development

- Ryan McHugh, Manager Tourism and Events, Tourism and Culture, Planning and Economic Development
- Lisa Abbott, Director Tourism and Culture, Tourism and Culture, Planning and Economic Development

City of Hamilton, City Manager's Office

- Michelle Lokun, Health Safety and Wellness Specialist, Human Resources, City Managers Office
- Brian MacDonald, Manager Corporate Partnerships, Digital and Innovation Office, City Managers Office
- Andy Zimmerman, Manager Social Medical Marketing and Creative Services, Communications and Strategy Initiatives, City Managers Office

Appendices and Schedules Attached

Appendix A: City of Hamilton Municipal Alcohol Policy & Operating Standards and Procedures

Prepared by: Robin Dozet, Health Strategy Specialist
Public Health Services, Epidemiology & Wellness Division,
Mental Well-Being and Substance Use

Submitted and recommended by: Julie Prieto, Director
Public Health Services, Epidemiology & Wellness Division