



September 22, 2011

Council, Hamilton, City of  
c/o Rose Caterini, City Clerk  
71 Main St. West  
Hamilton, Ontario L8P 4Y5

Dear Members of Council for the Hamilton, City of:

We are writing today, on behalf of MADD Canada, the Ontario Public Health Association and the Centre for Addiction and Mental Health to express our concerns about the current campaign to allow beer and wine to be sold at convenience stores.

In recent months, the Ontario Convenience Store Association has tried repeatedly to re-ignite the debate on the privatization of beer and wine sales. Our organizations strongly oppose allowing beer and wine to be sold in convenience stores.

Proponents of private alcohol sales would have us believe that selling beer and wine in convenience stores is no great gamble or risk. But does anyone truly believe purchasing alcohol is the same as purchasing a pack of gum or a carton of milk?

Alcohol is not an ordinary commodity and it should not be sold as one. It is linked with more than 65 medical conditions and is a contributing factor in injuries, impairments and deaths caused by illness, impaired driving, homicides, suicides, falls, drowning, assaults, fires and other adverse events that threaten public safety and community well-being. According to the National Alcohol Strategy, alcohol resulted in the deaths of an estimated 4,258 Canadians in 2002 and cost society \$14.6 billion in lost productivity and health care and law enforcements costs.

The strong links between privatized alcohol sales, increased consumption and increased alcohol-related harms to society are well-documented. A recent statistical analysis by Stockwell et al. (2009) documented a positive relationship between the number of private liquor outlets and alcohol sales using a unique data set from British Columbia. Since increases in overall sales have been correlated with increasing harms in the scientific literature, this development is troubling in terms of a potential worsening of alcohol-related health and social harms. Researchers at the Centre for Addiction and Mental Health showed that the privatization of the provincial alcohol monopoly in Alberta was associated with significant increases in that province's suicide mortality rates.

In Calgary, the number of liquor stores increased from 23 to nearly 300 between 1995 and 2003, following the privatization of alcohol sales in Alberta. During that same period, Calgary police reported a rise in impaired driving charges and family violence in areas of the city with the highest concentration of liquor stores.

Abandoning the current system in favour of a privatized or semi-privatized system puts the public at higher risk for a wide range of alcohol-related problems. As Sault Ste. Marie Police Chief Bob Davies indicated in a July 30, 2011 article in The Sault Star, putting booze in corner stores will encourage underage drinking. Chief Davies also doubts convenience store workers will scrutinize identification as closely as LCBO and Beer Store employees. Data from British Columbia clearly supports this concern. A 2008 report from the Provincial Health Officer (Kendall, P. [2008] Victoria, BC: Office of the Provincial Health Officer) outlined a compliance check of 831 Liquor Authority, rural agency, and private liquor stores using young-looking patrons of legal drinking age. The results revealed "significant differences in rates of compliance with age verification protocols across the various types of outlets, with government liquor stores performing substantially better than licensed private retail or agency stores in the province. Given the large increase in private and agency stores in recent years, this likely has important implications for youth access to alcohol in BC."

Privatization jeopardizes the social responsibility programming that is an integral part of the LCBO's operations. Its employees are trained in socially responsible service, know how to identify potential problems and know how to make appropriate judgement calls on issues related to age of customers and intoxication levels. Can we be sure that all convenience store staff will receive comprehensive training and ongoing guidance on such issues? A young clerk in a convenience store is arguably less likely to refuse service to a belligerent, intoxicated customer than a trained and experienced employee of an LCBO store.

Further, small businesses are faced with competitive pressures to ensure maximum sales. Refusal of sale would weigh more heavily and put a larger financial burden on a smaller retailer than a province-wide, publicly-owned network of stores. Regulations have been shown to be better enforced when the seller is not as financially dependent on maximizing profits.

Province-wide, there are approximately 1,000 LCBO and Beer Store retail sites. The estimated ratio of convenience stores to LCBO and Beer Store locations is 7 to 1. That means beer and wine would be sold at an additional 7,000 locations in communities throughout the province. This corresponds to a massive increase in alcohol availability, and substantial scientific research tells us that this will mean a large increase in alcohol-related problems, ranging from underage drinking and family violence to deaths from drunk driving, suicide and alcohol-related chronic disease. From your own community's perspective, consider the number of convenience stores in your municipality and what the outcome may be if they begin selling alcohol and beer. Consider the proximity of many of those stores to local high schools. Finally, consider the increased societal costs to police, health organizations and community groups which will have to monitor and address the negative impact associated with increased alcohol consumption and increased alcohol-related harms that result when access to alcohol is increased so significantly.

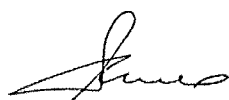
Provincial liquor boards such as the LCBO strike a fair and effective balance between consumers' access, selection and service, and the need to manage alcohol consumption and minimize alcohol-related harms and costs. Indeed, the World Health Organization and Canada's National Alcohol Strategy agree that liquor control board systems such as the LCBO provide an effective means of controlling alcohol consumption and alcohol-related harm in society.

Moreover, surveys by MADD Canada and the Centre for Addiction and Mental Health have shown that Ontarians are very satisfied with the LCBO and the social responsibility programs they operate, and that the majority is not in favour of selling beer and wine in convenience stores.

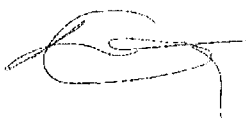
Governments, public health partners and community organizations worked very hard to restrict or remove tobacco products from convenience stores for the improved health of our communities and all Ontario residents. Replacing tobacco products on convenience store shelves with alcohol products would take us several steps backward in the health of Ontarians.

With all of these facts in mind, we ask you to consider passing a formal resolution, in support of our communities, to oppose any plan to put liquor, beer or wine into convenience stores. Please feel free to contact me at 1-800-665-6233, ext. 224 or [amurie@madd.ca](mailto:amurie@madd.ca) if you wish to discuss this further.

Sincerely,



Andrew Murie  
Chief Executive Officer  
MADD Canada



Siu Mee Cheng  
Executive Director  
Ontario Public Health Association



Dr. Catherine Zahn  
President and Chief Executive Officer  
Centre for Addiction and Mental Health

CC: Michel Perron, Chief Executive Officer  
Canadian Centre on Substance Abuse

