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2011 May 10

The Honourable Chris Bentley
Ministry of the Attorney General
720 Bay Street, 7th Floor
Toronto, ON M7A 2S9

Dear Minister Bentley:

In February 2011, you announced that the Ontario government would be exploring changes to the alcohol regulatory system, the Liquor Licence Act (LLA) of Ontario in the areas of licensing and enforcement. It has been stated that "the proposed changes will remove unnecessary barriers and restrictions that are expected to improve the tourism industry and local economy".

Unfortunately from a public health perspective, the removal of such barriers and restrictions may lead to some significant health consequences.

Alcohol policies play a vital role in the health and safety of our community. If weakened they can lead to increased health risks and harm. The most significant problems with the proposed changes to the Ontario LLA are that they promote alcohol, increases access to alcohol, and stimulate alcohol sales. There is an abundance of research evidence that reports restricting access to alcohol is part of a comprehensive strategy to improve and maintain health and reduce the risk for alcohol-related diseases and injuries.

In addition, the proposal undermines the 2008 Ontario Public Health Standards and ignores alcohol strategies that guide health experts, researchers, planners, and stakeholders to develop healthy public policies, increase community capacity, and create or enhance supportive environments.

The proposed changes also have the potential to increase alcohol access and binge drinking among youth in our community. In Canada a significant portion of youth ages 15 and over are drinking excessively.¹ In Ontario, approximately 62% of students have been drinking in the past year, or to put it differently, over 500,000 underage youth in Ontario have consumed alcohol.² Research has also found that hazardous/harmful drinking is reported in Ontario by approximately 16% of students. By relaxing alcohol regulations, the issues of youth access and binge drinking have the potential to increase and may lead to other negative impacts on family-oriented events.

1 Adlaf, E.M., & Paglia-Boak, A. (2005). Drug use among Ontario students No. 16. Toronto, Ontario, Canada: Centre for Addiction and Mental Health.

2 Statistics Canada. (2007). Age Groups (14) and Sex (3) for the Population of Canada, Provinces, Territories, Census Divisions and Census Subdivisions, 2006 Census - 100% Data. Retrieved September 2007, from <http://www12.statcan.ca/english/census/index.cfm>

Public Health Unit's across the province are working with their Boards of Health to develop responses in opposition to many elements of the proposed changes to the LLA.

At the April 21, 2011 Board of Directors meeting, the Board considered the above information and approved the following resolution;

"WHEREAS restricting access to alcohol is part of a comprehensive strategy to improve and maintain health and reduce the risk for alcohol-related diseases and injuries; and

WHEREAS increasing access to alcohol has been shown to increase consumption which in turn increases the risk for injury (e.g., crashes, fights, falls, alcohol-poisoning); and

WHEREAS youth in Ontario (grades 9-12) have concerning levels of alcohol consumption with 69.4% having drunk in the past year, 32.9% binge drinking (5 or more drinks), and 27.5% of students reporting drinking at a hazardous level (OSDUHS Report); and

WHEREAS a significant portion of Ontarians are drinking alcohol (81.5%), exceeding the low risk drinking guidelines (23.4%), consuming 5 or more drinks on a single occasion weekly (11.2%), and reporting hazardous or harmful drinking (15.6%) (CAMH Monitor); and

WHEREAS the World Health Organization (WHO, 2011) has indicated that alcohol is the world's third largest risk factor for disease burden and that the harmful use of alcohol results in approximately 2.5 million deaths each year; and

WHEREAS alcohol is associated with increased levels of health and social costs in Ontario and is causally related to over 65 medical conditions;

NOW THEREFORE BE IT RESOLVED that the Board of the Windsor-Essex County Health Unit recommends that the Association of Local Public Health Agencies (ALPHA) and the Ontario Public Health Association (OPHA) petition the Ontario government to maintain the current requirements of Liquor Licence Act (LLA) of Ontario until a formal review and analysis of proposed changes is completed

Letter to The Honourable Chris Bentley
2011 May 10
Page 3

AND FURTHER the Board of the Windsor-Essex County Health Unit encourages the Association of Local Public Health Agencies (alPHa) and the Ontario Public Health Association (OPHA) to petition for a formal review and analysis of the health and economic effects of alcohol in Ontario and for the development of a renewed provincial Alcohol Strategy.”

Sincerely,

ORIGINAL SIGNED BY

Gary McNamara, Chair
Board of Directors

GM:rs

cc: Premier McGuinty
Minister of Health Promotion and Sport
Minister of Health and Long-Term Care
Chief Medical Officer of Health
alPHa
Ontario Public Health Association
Ontario Boards of Health

