

March 23, 2011

The Honourable Chris Bentley
Ministry of the Attorney General
McMurtry-Scott Building
720 Bay Street, 11th Floor
Toronto, ON, M7A 2S9

Dear Minister Bentley,

Thank you for the opportunity to provide comments on the proposed changes to Ontario's alcohol regulation system and Liquor Licence Act (LLA) announced by the Ministry of the Attorney General on February 23.

As Medical Officer of Health for Ottawa Public Health, I have serious concerns regarding the proposed changes, including the removal of restricted areas for alcohol beverages at fairs, festivals and other events and the extension of alcohol serving hours at special events from 1 a.m. to 2 a.m. I ask that you not proceed with the proposed amendments.

The proposed changes present the potential for substantial negative impacts on the personal health of many individuals in our community in relation to the misuse of alcohol. Along with the health impacts - which arguably are largely unrecognized and underappreciated - the proposed changes also pose significant risks to the social fabric of our community.

Alcohol is no ordinary commodity, as the author Thomas Babor has noted. Regulating the physical availability of alcohol, including sales and service, is one of the top 10 best practice policy recommendations to reduce its harmful effects. Alcohol is a major risk factor contributing to disease, disability and mortality in Canada and the world, as noted in a 2009 study published in *The Lancet*. Alcohol use contributes to 23% of injuries in North America and is a contributing factor leading to a vast array of other diseases, including liver cirrhosis, neuropsychiatric conditions and several cancers.

The health impacts related to alcohol in our community come with significant costs to people's lives, our community and the economy as a whole. Between 2003 and 2008, 44 people died on Ottawa roads and highways in alcohol-related motor vehicle collisions. Another 127 people in Ottawa were seriously injured during the same period as a result of alcohol-related traffic collisions. The proposed expansion of alcohol sales hours brings the risk of increased injuries in Ontario communities. A 2008 study published in the *Journal of Studies on Alcohol and Drugs* showed the one-hour increase of alcohol service hours in Ontario in 1996 led to a significant increase in injuries admitted to regional trauma units.

.../2



Along with the inestimable human toll, alcohol also incurs notable economic costs in Ontario. The provincial government and taxpayers spend more on the harms linked to alcohol than it recovers on alcohol sales. Each year, there is a \$456-million deficit, due to enforcement and health care costs, as indicated by Gerald Thomas, senior research and policy analyst at the Canadian Centre on Substance Abuse in September 2010. The proposed LLA changes also have the potential of burdening municipalities with increased enforcement costs and impacts for other municipally-funded services including fire, ambulance and public works.

There are profound concerns, too, among our municipal and community partners regarding the proposed changes to the LLA. Ottawa's Police Services Chief has expressed his concerns regarding the impact of the proposed changes on enforcement at fairs and festivals and increased alcohol access to underage minors. At the March 18, 2011 consultation session in Ottawa hosted by the Ministry of the Attorney General, many rural fair organizers in the Ottawa area expressed concern about the negative impacts on family-oriented events if alcohol regulations are relaxed.

The proposed LLA changes pose a serious public health risk leading to increased access to alcohol for children and youth. In Ottawa, alcohol is the most commonly used drug used by youth, with 57% of Ottawa high school students drinking alcohol in the past year, according to a 2009 Centre for Addiction and Mental Health (CAMH) study. One in four Ottawa high school students reports binge drinking during the previous month and 11% of students report being injured or injuring someone as a result of their drinking in the 12 months before the survey. The provincial government's proposed changes have the potential to contribute to the problem of binge drinking among youth in our community.

The proposed LLA changes give all community partners an opportunity to reflect on the societal impact of alcohol access. Research shows that children and youth model adult behaviour related to alcohol. A 2009 CAMH study found children in families who were exposed to inappropriate consumption were at an increased risk of misusing alcohol themselves. Increasing access to alcohol through extended service hours and relaxed restrictions at public events poses real and serious risks for the future misuse of alcohol by children and youth.

Lastly, the proposed LLA changes are also in direct opposition to the healthy policy recommendations regarding alcohol use as mandated by the Ministry of Health and Long-Term Care (MOHLTC) and the Ministry of Health Promotion and Sport (MHPS). Provincial public health units are mandated by the MOHLTC to uphold the 2008 Ontario Public Health Standards which require boards of health to work with municipalities and community partners to develop healthy policies and programs that address alcohol use. The MHPS also provides funding to local health units, including Ottawa Public Health, to implement policies in key priority areas including alcohol and substance misuse. The proposed changes to the LLA by the Ministry of the Attorney General weakens existing healthy public policy in Ontario.

I appreciate the opportunity to provide input on this important issue with you.

Sincerely,

Isra Levy, MB BCh, MSc, FRCPC, FACPM
Medical Officer of Health

cc: Dr. Arlene King, Chief Medical Officer of Health
Allison Stuart, Assistant Deputy Minister, Ministry of Health and Long-Term Care
Jean Lam, Assistant Deputy Minister, Ministry of Health Promotion and Sport

