

January 15, 2014

Honorable Kathleen Wynne
Premier - Minister's Office
Legislative Building
Room 281,
Queen's Park
Toronto, ON M7A 1A1

Dear Premier Wynne:

Re: Regulation of Wine Outlet expansion into Farmers Markets

As the Chair of the Board of Health for the Simcoe Muskoka District Health Unit, I am writing in response to your recent announcement to allow for VQA wines to be sold at farmers' markets. The Board of Health has communicated to the provincial government its concerns regarding the potential for increased harm to the health of the public with the increased availability in alcohol that would occur with proposed changes to provincial alcohol controls in recent years. Allowing the sale of wine in farmers' markets would result in such an increase in the availability and consumption of alcohol and thus of alcohol related harms in Ontario. Research has demonstrated that increased consumption and harm from alcohol is associated with accessibility to alcohol as determined by the number of retail outlets and vendors per capita, hours and days of sale, and type of retailing system. Government retailing systems such as the Liquor Control Board of Ontario (LCBO) have been shown to be significantly more effective in controlling access to alcohol and are more effective in preventing sales to minors and to intoxicated patrons thereby curtailing alcohol related harms.

The expansion of the sale of wine at farmers markets would erode alcohol control policies put in place to mitigate alcohol related harms in Ontario. This privatization of alcohol sales would set a precedent for the further expansion of the sale of other alcohol products in other venues across Ontario. In addition to increasing the availability of alcohol and eroding evidence-based policy, it would further normalize alcohol as an innocuous and common product for members of the general public including children and youth attending farmers markets to purchase local fresh produce. [Alcohol is no ordinary commodity](#) and should not be treated as such.

Following tobacco, alcohol is responsible for the second highest rate of death and disease in Canada. It contributes to injuries including fatalities from impaired driving, and to a range of chronic diseases. Its' negative impact on public safety and community well-being is well documented including homicides, suicides, assaults, fires, drowning's, and falls. The annual cost of health care, law enforcement, corrections, prevention, lost productivity, and related problems is estimated to be \$5.3 billion in Ontario which exceeds revenues by more than \$456 million. (Gerald Thomas Canadian Centre on Substance Abuse2002).

Over the past several years the Board of Health for the Simcoe Muskoka District Health Unit has communicated its concerns regarding the impact that alcohol has on our communities and has called upon the provincial government for the following:

- In September 2013 the Board of Health communicated to the Premier on the need for a collaborative approach to alcohol control that would look at engaging key ministerial stakeholders in addressing the impacts of alcohol through a health and economic lens. We also recommended that the mandate of the Alcohol and Gaming Commission of Ontario be broadened to explicitly include the protection of the public's health in addition to the protection of public interest.

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- In April 2011 a letter was sent to the Attorney General recommending that a formal review of the health and economic impact of alcohol in Ontario be done and that a provincial Alcohol Strategy be developed. We also recommended that all proposed changes to the Liquor Licence Act be deferred until the formal review has been completed.
- In Oct 2011 a letter to the premiers' office was sent opposing the semi privatization of alcohol sales, including any plans to sell beer and wine in convenience stores.
- In April 2010 a letter was sent advocating for continued full public ownership of LCBO outlets, as a means of protecting the health and safety of Simcoe Muskoka residents and other Ontarians.

As an organization we support the moderate consumption of alcohol within Canada's Low Risk Drinking Guidelines. We also support the availability of safe and nutritious locally grown fresh produce through venues including farmers' markets. However the provision of alcohol within these venues would be contrary to the best interests of the health of the public. The sale of locally produced wine is best accomplished through the LCBO which has the checks and balances in place to address the sale of alcohol in a socially responsible manner.

Sincerely,

ORIGINAL SIGNED BY

Barry Ward
Chair, Board of Health

- c. The Honourable Deb Matthews, Minister of Health and Long-Term Care
The Honourable John Gerretsen, Attorney General
Dr. Arlene King, Chief Medical Officer of Health, Ministry of Health and Long-Term Care
Kate Manson-Smith, Assistant Deputy Minister, Health Promotion
Ontario Boards of Health
Linda Stewart, Executive Director, Association of Local Public Health Agencies
Ontario Public Health Association
Simcoe Muskoka Members of Provincial Parliament of Ontario
North Simcoe Muskoka and Central Local Health Integration Network

References:

1. The Global Status Report on Alcohol and Health (2011) World Health Organization. Retrieved Sept. 16, 2013 from: http://www.who.int/substance_abuse/publications/global_alcohol_report/en/index.html
2. Rehm, J., Baliunas, D., Brochu, S., Fischer, B., Gram, W., Patra, J., Popova, S., Samocinska-Ham, A., Taylor, B. (2006). The Cost of Substance Abuse in Canada 2002 – Highlights. Canadian Centre on Substance Abuse. Retrieved Sept. 16, 2013 from: <http://www.ccsa.ca/2006%20CCSA%20Documents/ccsa-011332-2006.pdf>
3. **Alcohol: No Ordinary Commodity – a summary of the second edition** (2010) Society for the Study of Addiction. *Addiction*, **105**, 769–779.
4. Reducing Alcohol Related Harm in Canada: Toward a Culture of Moderation, 2007, The National Alcohol Strategy Working Group. www.ccsa.ca/2007%20CCSA%20Documents/ccsa-023876-2007.pdf