

July 12, 2024

Strategic Opportunities Review Working Group
City of London
300 Dufferin Ave.
London, ON
N6A 4L9

RE: Proposal for Alcohol Sales in Municipal Facilities

Dear Members of the Strategic Opportunities Review Working Group,

Thank you for the opportunity to provide input as you consider the potential to license City of London facilities for the sale of alcohol as a revenue stream. Our public health approach to alcohol regulation aims to find a balance between alcohol availability and the enactment of measures to protect public health and safety. Yet, research has confirmed that expanding alcohol availability (e.g., increasing the number of outlets where alcohol can be purchased) results in increases in consumption and consequently increases in alcohol-related health and social harms (CAPE, 2023).

Please take into consideration the following when discussing whether to explore local expansion of alcohol sales at municipal facilities.

Alcohol is not a revenue generator

The costs of alcohol outweigh the revenue of sales. In 2020/21, alcohol cost Ontario taxpayers over \$7 billion in direct (e.g., healthcare, enforcement, social and legal systems) and indirect (e.g., lost productivity) costs (Naimi et al., 2023). Despite perceptions that alcohol is a large revenue generator, in 2020/21 alcohol generated just over \$5 billion in returns for Ontario, creating a nearly \$2 billion deficit (Naimi et al., 2023). When looking at the overall costs of substance use in Ontario, the greatest burden is alcohol (7.1 billion dollars) compared to other substances including tobacco (\$4.2 billion dollars), opioids (2.7 billion dollars) and cannabis (0.89 billion dollars) (CSUCH, 2023).

Increased access to alcohol increases harms

Alcohol harms include injuries (e.g., falls, collisions), suicide, violence (including intimate partner violence), crime, Fetal Alcohol Spectrum Disorder, and numerous chronic diseases including liver disease (CCSA, 2023). Alcohol is also a known carcinogen and causes at least seven different types of cancers including breast and colon cancer (CCSA, 2023).

In 2019-2020, 30% of Middlesex-London residents aged 12 years and older were drinking above what is considered a low risk level; 3 or more standard drinks in the past 7 days (PHO, 2023a).

Locally, we can see the impacts of alcohol in our health, social, and enforcement systems. In an average year in the Middlesex-London region, there is an estimated 154 deaths, 842 hospitalizations and 6,968 Emergency Room visits that are attributable to alcohol consumption among people 15 years and older (PHO, 2023b).

Restricting alcohol availability (e.g. through on-premise establishments, off-premise retail outlets, hours of operation, etc.) are evidence-based strategies to reduce alcohol harms.

Alcohol exposure increases youth use

Youth alcohol use is an ongoing concern. Alcohol negatively impacts the developing brain, educational attainment, and mental well-being, as well as increases the risk of injuries and risky behaviours (WHO, 2023). Environments where alcohol is widely accepted, available, and affordable are harmful to youth (WHO, 2023).

Youth frequent municipal facilities and youth are particularly vulnerable to alcohol advertising and promotion. The environment where youth live and play impacts their substance-use decisions now and in the future. Youth exposure to alcohol through outlets, marketing, product promotion, and visible use in public contributes to the normalization of alcohol and can increase youth use (CAPE, 2023). The WHO identifies outlet density, advertising, affordability, and exposure as main risk factors for alcohol use and harms in young people (WHO, 2023). Substance-free public spaces and activities support youth prevention, and positive adult-role modeling for youth.

We are already anticipating an increase in exposure to advertising and promotion to youth through the provincial expansion in alcohol retail outlets, where alcohol will be available in stores frequented by youth (e.g. convenience stores and grocery stores). Currently, there are no provincial restrictions with respect to density or proximity to sensitive land use areas (e.g., minimum separation distances between alcohol retailers, and/or between alcohol retailers and schools, recreation facilities, parks, or healthcare facilities).

Promoting community safety and well-being

Substance use was identified in the top five risks that require addressing to improve community safety and well-being in London (City of London, 2021). Identifying opportunities within the City of London to reduce alcohol harms aligns with creating safe and vibrant neighbourhoods and healthy and resilient people, as outlined in the Community Safety and Well-Being Plan. Increasing accessibility and promoting alcohol consumption would not align with community goals and can increase liability to the municipality.

In the 2023 Chief Medical Officer of Health of Ontario's annual report, "Balancing Act: An All-of-Society Approach to Substance Use and Harms" Dr Kieran Moore states "Our collective experiences during recent challenges, notably the COVID-19 pandemic, have showcased the resilience and strength of Ontario's communities. Today, we face another challenge – the rise in substance use and related harms, which threatens the health of Ontarians and the well-being of our communities. By working together, we can find that critical balance to an all-of-society approach that will lead to a healthier future for all Ontarians."

Together, we can work to establish a balance between access to alcohol and the deleterious effects of alcohol on the population's health.

Sincerely,



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Associate Medical Officer of Health

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