

May 12, 2014

Mayor Joe Fontana City of London P.O. Box 5035 London, ON Canada N6A 4L9

Dear Mayor Fontana and London City Council

Re: Board of Health Report No. 026-14

On April 24th, 2014, the Middlesex-London Board of Health endorsed the attached report. In essence, the Board's discussion emphasised and reflected the importance that any change made to the alcohol retail and regulation system must take into consideration the known adverse economic, health and societal impact to the community. As identified in the attached letter from the Association of Local Public Health Agencies, a health in all policy must be considered and stakeholder consultation must be part of any provincial alcohol expansion decisions.

Consuming alcohol in accordance with the National Low Risk Drinking Guidelines promotes both a culture of moderation and the choice to live a healthy lifestyle while offering some benefits for those 45 years and older. These benefits can include a reduced risk for ischemic stroke, heart disease and diabetes, but as the amount of alcohol regularly consumed in a day increases, so does the risk of a wide range of other physical and mental illnesses, including a number of cancers, liver disease, cardiovascular disease, stroke, and depression. In 2010 it was estimated by Cancer Care Ontario, that 1,000 new cases of cancer diagnosed in Ontario (equivalent to about 2% of all new cancer cases) can be attributed to alcohol. In the same year, the Middlesex-London Community Health Status Resource reported that 33.4% of the population 19 and older in Middlesex-London reported exceeding the Low Risk Drinking Guidelines which is statistically higher than the provincial average.

It is imperative that whenever decision are made to broaden the alcohol retail system that all governments, municipal, provincial and national, consider the economic, health and social impact that alcohol has on our communities. A pilot project allowing for the sale of VQA wine in farmer's markets included stakeholder consultation along with specific legislated guidelines and the allowance for municipalities to opt out. The Ministry has committed to monitoring and evaluating VQA wine sales. It is important to note that the province has taken the initial steps to ensure that public safety is taken into consideration, but further monitoring of these projects needs to occur to balance their economic benefits with the health and social consequences of increased alcohol availability.

However, the Board of Health is concerned with the LCBO expansion of 10 express kiosks within grocery stores across Ontario. Stakeholder consultation was neglected and thus concerns related to increased availability of alcohol and health not considered as part of this expansion. Our current alcohol retail system strikes a balance between consumer access, selection and service and the need to minimize alcohol-related harms. The sale of alcohol is best conducted in retail establishments which has the checks and balances in place to address the sale of alcohol in a socially responsible manner. This approach to alcohol sales regulation and policy prioritize the public's health and considers the societal cost associated with alcohol consumption.

The Middlesex-London Health Unit Board of Health agree, as identified in the two attached letters, that the decisions about how alcohol is regulated and sold must be made within the broader context of its known and measurable harms, negative economic impacts and most importantly, risks to the public's health. Therefore, it would be appreciated that our associated municipalities also keep these known harms in the forefront when making decisions for their community.

Sincerely,

Christopher Mackie MD, MHSc, CCFP, FRCPC

Medical Officer of Health and CEO

Middlesex-London Health Unit

MIDDLESEX-LONDON HEALTH

MIDDLESEX-LONDON HEALTH UNIT

REPORT NO. 026-14

TO: Chair and Members of the Board of Health

FROM: Christopher Mackie, Medical Officer of Health

DATE: 2014 April 24

EXPANSION OF ALCOHOL SALES IN ONTARIO

Recommendations:

It is recommended that the Board of Health:

- a. Forward a copy of this report and appendices to the municipalities of Middlesex County and the City of London; and
- b. Send a letter to the Minister of Finance endorsing the Centre for Addiction and Mental Health (CAMH)/Ontario Public Health Association (OPHA) recommendations to proceed cautiously with the sale of VQA wines within Farmer's markets; and
- c. Indicate to the Minister of Finance that the Board shares the concerns expressed by the Association of Local Public Health Agencies (alPHa) regarding the addition of LCBO Express kiosks in grocery stores.

Key Points

- Availability of alcohol is related to amount of consumption and in turn the number of alcohol related harms and deaths.
- The costs of alcohol-related morbidity and mortality exceed the government revenue generated from alcohol sales by \$500 Million.
- The provincial government has approved the sale of Vintner's Quality Alliance (VQA) Ontario wines at farmer's markets on a pilot basis for two years; municipalities have the option to opt out of this pilot through local bylaws.
- The provincial government has also announced that 10 LCBO Express outlets will be opened in grocery stores across the province.

Background

After tobacco, alcohol is the leading cause of illness in high-income countries. In 2011, 19% of Canadians reported consuming sufficient alcohol to have chronic health effects such as liver damage, and 13% of Canadians reported binge-drinking to levels associated with acute effects such as alcohol poisoning.

On December 16th, 2013, Premier Wynne announced the renewal of Ontario's Wine and Grape Strategy to continue to support Ontario's wine industry. Changes were made to the *Liquor License Act* to permit a pilot project allowing the sale of VQA wines at farmer's markets across Ontario. The preliminary project proposal recognizes the need to carefully consider potential negative impacts and contains several safeguards, including an opportunity for municipalities and farmer's markets to 'opt out' of the pilot project if they choose. The Centre for Addiction and Mental Health (CAMH) and the Ontario Public Health Association (OPHA), in their March 21, 2014, joint submission to the Ministry of the Attorney General (Appendix A), commended the government on this balanced approach and made recommendations for further safeguards.

On April 1st, 2014, Premier Wynne announced that 10 LCBO Express outlets will be opened in in grocery stores across the province. London has been selected as a designated site for one kiosk. The Association of Local Public Health Agencies (alPHa) expressed serious concerns (Appendix B) about this decision and the lack of consultation with public health organizations.

Public Health Implications of Increased Alcohol Availability

Current research indicates that increasing the availability of alcohol increases the amount of consumption and in turn the number of alcohol related harms and deaths from both chronic disease and acute health hazards. While alcohol sales generate revenue for the province, alcohol-attributable health and social costs due to increased morbidity and mortality, law enforcement demands and lost productivity exceed the generated revenue by approximately \$500 million.

Alcohol and substance misuse prevention is a key component of the Ontario Public Health Standards. The 2011-13 Accountability Agreements between public health units and the Ministry of Health and Long Term Care include "% of adults exceeding the Low Risk Alcohol Drinking Guidelines" as a performance indicator. To meet this performance indicator, public health units work to promote a culture of moderation and to minimize excessive alcohol consumption. In 2009/10 the proportion of those aged 19 and older, in Middlesex-London who exceeded the low risk drinking guidelines was 33.4%, which was significantly higher than the proportion for Ontario as a whole, at 28.0%.

Access to Alcohol

Research has demonstrated that when availability restrictions are in place, alcohol use and associated problems decrease. Regulating the availability of alcohol is among the most effective ways to control harm and costs at a population health level. At this time, residents living in the City of London and Middlesex County have access to approximately 51 retailers (Appendix C) that offer an assortment of VQA wines, spirits and beer. They are as follows:

- 16 LCBO stores (over 500 VQA wines available),
- 5 Agency stores (licenced by AGCO and supported by the LCBO),
- 13 Independent wine stores,
- 17 Beer Stores.

The province of Ontario has 1,200 alcohol retailers serving 13.3 million people - approximately 1 store for every 11,000 people. In comparison, the 51 alcohol retailers in Middlesex-London serve 366,151 people - approximately 1 store for every 7,200 people. The Middlesex-London region has a higher alcohol outlet density than the province as a whole. Selling VQA wine at local farmer's markets will increase alcohol outlet density, resulting in greater alcohol availability (See Appendices D and E).

Different Settings and Product Mixes

The risks associated with the misuse of alcohol differ between the types of locations where alcohol is sold. Off-premise retailers, such as the LCBO, The Beer Store, and wine outlets, tend to be associated with violent crimes and assaults due to increased consumption of alcohol in the home. On-premise outlets such as bars, nightclubs, and restaurants, are associated with increased binge drinking, underage drinking, and drinking and driving incidents.

There is limited research regarding farmer's markets and wine-only alcohol outlets. It is unclear whether the data relating alcohol outlet density to harms associated with problem drinking would apply in the same way to this setting and product mix. However, there is ample reason to be cautious with the introduction of new alcohol outlets in a community that is already over-served relative to the Ontario average. The recommendations in this report aim to balance this lack of specific evidence with the need for caution.

Conclusion

Although these changes in the availability of alcohol may appear to be relatively minor, expansion in the availability of alcohol has the potential to lead to negative public health consequences and must therefore be carefully considered. It is notable that the VQA farmer's market project was followed shortly thereafter by the announcement that LCBO Express kiosks will be opening in grocery stores. This may indicate that the provincial government will expand availability in more significant ways in the near future.

Endorsing the recommendations made by CAMH and OPHA in their submission of March 21, 2014, would demonstrate the Health Unit's support for a careful and measured approach to balancing the economic benefits of the VQA project with the health and social consequences associated with increased alcohol availability. In addition, showing that the Health Unit shares the concerns expressed by The Association of Local Public Health Agencies (alPHa) re-enforces MLHU's position that alcohol is no ordinary commodity and decisions about how it is regulated, promoted and sold must be made carefully with due consideration of its known and measureable societal harms.

Christopher Mackie, MD, MHSc, CCFP, FRCPC Medical Officer of Health

This report addresses the following requirement(s) of the Ontario Public Health Standards: *Prevention of Injury and Substance Misuse and Chronic Diseases and Injuries*





Submission to the Ministry of the Attorney General: Proposed regulatory amendments to the Liquor Licence Act

March 21, 2014

In high-income countries such as Canada, alcohol is a leading contributor to disease, disability and mortality with substantial social costs involving health care, law enforcement, family, community, and work-place disruptions. Alcohol is a causal factor in more than 60 types of diseases and is a component cause in 200 others, including cardiovascular diseases, various cancers, liver diseases, and mental health problems. Alcohol use during pregnancy is a leading preventable cause of brain damage and birth defects among newborns. It is also a significant cause of injuries as well as fatalities from impaired driving, violence, and suicide.

In Ontario, alcohol is responsible for the highest rate of substance-attributable morbidity and mortality after tobacco. While alcohol sales do generate revenue for the province, alcohol-attributable costs such as health care, law enforcement, and lost productivity due to short- and long-term disability and premature mortality exceed the generated revenue by approximately \$500 million annually.

We appreciate the provincial government's recognition that alcohol sales must be carefully regulated, as illustrated by the government's resistance to calls for sales of alcohol in convenience stores. However, the plan to allow the sale of VQA wines at farmers' markets across the province is cause for concern, as it involves increased access to alcohol and selling a highly regulated product in what is essentially an unregulated market place where there is considerably less monitoring and control.

We strongly believe that the sale of locally produced wine is best conducted through the LCBO, which has the checks and balances in place to address the sale of alcohol in a socially responsible manner. However, if this pilot program does proceed, health and safety concerns should be paramount. We commend the government for including the following elements in its preliminary plan, and recommend that they be included in the final regulations:

- Restrict the pilot to VQA wines for a defined period of two years.
- Require that staff involved in the sale and service of VQA wines at farmers' markets hold an approved server training certificate (e.g. Smart Serve).
- In order to limit the volume and geographic scope of sales, do not allow wineries to warehouse products
 on site at the markets. This will help prevent these wine booths from operating as standalone retail
 outlets, which would lead to a considerable increase in outlet density given the number of farmers
 markets in Ontario.
- Allow municipalities and farmers' markets to opt out of this pilot. Farmers' markets selling wine should furthermore comply with any municipal alcohol policies that may be in place.
- Carefully validate winery requests to sell at particular farmers' markets to prevent the rise of "pop-ups" calling themselves a farmers' market but mainly selling alcohol.

We also offer the following recommendations:

Availability:

- 1. Hours of operation for VQA wine sales at farmers' markets should be consistent with the hours of on-site winery retail stores.
- 2. Tastings at farmers' markets, if permitted, should be required to comply with current sampling regulations.

Policies and regulations that control the availability of alcohol are very important in achieving public health and safety goals. Evidence shows that controls on hours and days of sale effectively limit alcohol consumption and related harms. Since licenses to sell in farmers' markets will serve as extensions of onsite winery retail store (WRS) licenses, we strongly recommend that existing controls on WRS hours of operation and sampling be applied to VQA wine sales at farmers' markets.

3. Farmers' markets should limit the number or proportion of booths dedicated to VQA wine sales, and sales and sampling should be confined to a designated area.

Alcohol is not an ordinary commodity and should not be treated as other products. Currently, alcohol sales channels are kept separate from other goods in order to maintain a regulated market. This recommendation is meant to facilitate the regulation and control of sales and service of VQA wine products in a socially responsible manner.

Advertising:

4. VQA wine sales at farmers' markets should be expected to conform to existing rules around alcohol marketing and advertising.

The link between levels of exposure to alcohol advertising and alcohol consumption and related harms is well established. Existing rules in this area should apply – particularly constraints pertaining to advertising of price and multi-unit discounts such as 2-for-1 deals.

Evaluation:

5. The evaluation of this pilot should include public health indicators.

We applaud the government for stating its commitment to refraining from expanding or extending the pilot without a rigorous evaluation. It is important that public health indicators be included in these evaluation activities and that those with expertise in assessing the public health and safety implications of alcohol sales (for example Public Health Ontario and/or the Institute for Clinical Evaluative Sciences) be involved in planning and implementing any evaluation.

Our current alcohol retail system strikes a balance between consumer access, selection, and service on one hand and the need to minimize alcohol-related harm on the other. Government-owned and operated liquor control boards such as the LCBO provide an effective means of controlling alcohol consumption and alcohol-related harm. We believe that the sale of locally produced wine is best conducted through the LCBO, which has the checks and balances in place to address the sale of alcohol in a socially responsible manner. An approach to alcohol policy and regulation that prioritizes public health and considers the costs associated with alcohol consumption is critical to the health and well-being of Ontarians.

For more information, please contact:

JF Crépault Cathy Edwards

Senior Policy Analyst, CAMH Chair, OPHA's Alcohol Prevention Workgroup

416 535-8501 x32127 613 549-1232 x1508

The Centre for Addiction and Mental Health (CAMH) is Canada's largest mental health and addiction teaching hospital, as well as one of the world's leading research centres in this area. CAMH combines clinical care, research, education, policy development, and health promotion to transform the lives of people affected by mental health and addiction issues.

The Ontario Public Health Association is a not-for-profit, member-based organization formed in 1949 to provide an independent voice for citizens committed to improving the health of all Ontarians. Its mission is to provide leadership on issues affecting the public's health and to strengthen the impact of people who are active in public and community health throughout Ontario. OPHA does this through a variety of means including advocacy, capacity building, research and knowledge exchange and transfer. OPHA's membership represents many disciplines across multiple sectors.



alPHa's members are the public health units in Ontario.

alPHa Sections:

Boards of Health Section

Council of Ontario Medical Officers of Health (COMOH)

Affiliate Organizations:

ANDSOOHA - Public Health Nursing Management

Association of Ontario Public Health Business Administrators

Association of Public Health Epidemiologists in Ontario

Association of Supervisors of Public Health Inspectors of Ontario

Health Promotion Ontario

Ontario Association of Public Health Dentistry

Ontario Society of Nutrition Professionals in Public Health 2 Carlton Street, Suite 1306 Toronto, Ontario M5B 1J3 Tel: (416) 595-0006 Fax: (416) 595-0030 F-mail: info@alnhaweb.org

April 9 2014

Hon. Charles Sousa Minister of Finance Frost Bldg S, 7th Flr 7 Queen's Park Cres Toronto ON M7A1Y7

Dear Minister Sousa,

Re: LCBO Express Locations

On behalf of member Medical Officers of Health, Boards of Health, and Affiliate organizations of the Association of Local Public Health Agencies (alPHa), I am writing today to express our disappointment in your failure to consult with us prior to announcing your decision to invite requests for proposals from grocery stores to host LCBO Express stores.

We have clearly and on several occasions stated our position that any changes to the way beverage alcohol is sold in Ontario must be preceded by careful consultation with our members. Such changes can have a significant impact on health, and this needs to be a primary consideration, especially where increasing availability of alcohol is concerned.

As recently as last month, we were invited to provide our input to the decision to allow the sale of VQA wines at Ontario Farmers' Markets. In so doing, our Council of Ontario Medical Officers of Health (COMOH) expressed concern that while this decision meant only a small expansion of alcohol availability in a specific context, it could be used as an argument to expand the availability of beverage alcohol in other venues. It is clear that this concern was entirely valid, and we are dismayed that we were not similarly invited to comment on this decision, which has a much farther reaching impact on alcohol availability.

Our members strongly agree that alcohol is not an ordinary commodity, and decisions about how it is regulated, promoted and sold must be made within the broader context of its known and measurable societal harms, negative economic impacts and most importantly for us, risks to the public's health.

Direct health problems leading to chronic disease and death, as well as drunk driving and violence are the most obvious examples of the adverse impacts of alcohol use and abuse. It is well-established that access increases consumption, which in turn increases the numerous alcohol-related harms as well as societal costs to the Province related to such things as law enforcement and economic productivity.

The Ministry of Health and Long-Term Care (MOHLTC) clearly recognizes that alcohol consumption is an important public health issue. The Ontario Public Health Standards (OPHS) set out requirements that oblige our members to evaluate the impacts of alcohol consumption and develop health promotion and protection strategies to prevent them. The related 2011-2013 Accountability Agreements between our members and the Ministry include the % of adults exceeding the Low Risk Alcohol Drinking Guidelines as a performance indicator.

We have expressed our concerns in the past about using performance indicators that are substantially influenced by factors outside of the control of public health units, and the Province's decision to expand alcohol availability by allowing kiosks in grocery stores is a clear instance of this problem. It amounts to a situation where the Government's own actions are undermining what it expects us to achieve.

I have attached two of our alcohol-related resolutions and the text of COMOH's input to the VQA consultation to remind you of the seriousness of this issue. Decisions like this one are not matters of economics and convenience alone. They include an important public health dimension that needs to be part of any conversation involving the regulation of alcohol availability.

Sincerely,

Mary Johnson alPHa President.

Copy: Hon. Kathleen Wynne, Premier of Ontario

Hon. Deb Matthews, Minister of Health and Long-Term Care

Dr. Arlene King, Chief Medical Officer of Health

Kate Manson-Smith, Assistant Deputy Minister of Health and Long-Term Care (Health Promotion Division)

Roselle Martino, Executive Director, Public Health Division, Ministry of Health and Long-Term

Care

Sylvia Shedden, Director, Public Health Standards, Practice And Accountability Branch, Ministry Of Health And Long-Term Care

Encl.



ALPHA RESOLUTION A08-4.1

TITLE: Eliminate The Availability Of Alcohol Except In Liquor Control Board Outlets (LCBO) (i.e. Increase Point Of Sale Control)

WHEREAS There is a well-established association between easy access to alcohol and overall rates

of consumption and damage from alcohol; and

WHEREAS 73% of Ontarians disagree with the privatization of alcohol retail sales; and

WHEREAS 77% of Ontario adults want beer and liquor store hours to stay the same; 77% want

hours of sale in bars to stay the same; and 94% support government involvement in the

prevention of alcohol-related problems. (Anglin et al., 2004);

NOW THEREFORE BE IT RESOLVED THAT that the Association of Local Public Health Agencies (alPHa) petition the Ontario government to maintain its monopoly on off-premise liquor sales through the Liquor Control Board of Ontario;

AND FURTHER THAT alPHa petition the Ontario government to retain oversight of beverage alcohol at Ontario wineries, microbreweries and the Beer Store through the provisions of the Liquor License Act;

AND FURTHER THAT alPHa petition the Ontario Government to fully consult with health experts, including but not limited to alPHa, the Centre for Addiction and Mental Health and the Ontario Public Health Association before making any policy changes to the availability of beverage alcohol.



alPHa RESOLUTION A12-4

TITLE: Alcohol Pricing and LCBO Revenue Generation

WHEREAS the Liquor Control Board of Ontario (LCBO) will be implementing a number of measures

to deliver \$100 million per year in additional net revenue to the Province; and

WHEREAS research has clearly established an association between easy access to alcohol (either

through low prices or physical availability) and overall rates of consumption and damage

from alcohol (Barbor et al., 2010); and

WHEREAS Ontario has a significant portion of the population drinking alcohol (79.1%), exceeding

the low risk drinking guidelines (27.4%), consuming 5 or more drinks on a single occasion weekly (9%), and reporting hazardous or harmful drinking (16.7%) (CAMH

Monitor, 2009); and

WHEREAS the low cost of alcohol from do-it-yourself brewing and winemaking facilities can

potentially lead to individuals inexpensively producing and consuming harmful levels of

alcohol (Recommendations for a National Alcohol Strategy, 2007); and

WHEREAS it has been established that increasing alcohol pricing can achieve the financial goal of

increased revenues while realizing the health benefits of reduced alcohol consumption. Saskatchewan increased minimum prices and saw a decline in alcohol consumption of 135,000 litres of absolute alcohol and a revenue increase of \$9.4 million last year (G.

Thomas, CCSA, 2012); and

WHEREAS increased alcohol sales will reduce overall provincial revenues since direct costs from

alcohol-related healthcare and enforcement already leave Ontario with a \$456 million

annual deficit (G. Thomas, CCSA, 2012); and

WHEREAS billions of dollars are spent each year in Canada on indirect costs associated with alcohol

use (illness, disability, and death) including lost productivity in the workplace and home

(The Costs of Substance Abuse in Canada, 2002);

NOW THEREFORE BE IT RESOLVED that the Association of Local Public Health Agencies (alPHa) urgently request that the Premier of Ontario (Dalton McGuinty), the Minister of Health and Long-Term Care (Deb Matthews), the Office of the Attorney General (John Gerretsen), the Minister of Finance (Dwight Duncan), and the Chief Medical Officer of Health (Arlene King), only consider revenue generation from increased pricing on alcohol, not fostering increased alcohol sales. Furthermore, the leader of opposition parties NDP (Andrea Horvath) and PC (Tim Hudak) should be copied on this communication.



COMOH Submission – Regulatory Registry

Liquor Licence Act Regulation: VQA Wine Sales in Farmers' Markets

Ministry of the Attorney General

Regulation Number: R.R.O. 1990, Regualtion 720 under the Liquor

Licence Act

Feedback on proposed regulatory amendments to allow a pilot program for the sale of VQA wine at farmers' markets, by occasional extensions of on-site winery retail stores; submitted electronically March 20, 2014.

As the Chair of the Council of Ontario Medical Officers of Health (COMOH), I am writing to provide the COMOH's feedback on the Premier's proposal to allow the sale of VQA wines at farmers' markets commencing May 1, 2014. This proposal was discussed at our February 2014 meeting during which COMOH supported a balanced position reflecting known public health principles related to alcohol consumption with the recognition that VQA wines and farmers' markets are an important part of Ontario's agriculture sector and economy.

A number of concerns were raised by COMOH members:

- 1. The sale of alcohol to minors must continue to be well controlled. We are pleased to see that that the Alcohol and Gaming Commission of Ontario (AGCO) will develop educational materials for wineries wishing to sell VQA wine at farmers' markets and that wineries will be required to staff farmers' markets with employees who have been SmartServe trained. However, these are minimum requirements for the safe sale of alcohol. COMOH strongly supports that the same vigilance be required of the AGCO in not allowing sales to those under 19 as is currently required of retail outlets of the LCBO.
- 2. Research has demonstrated that consumption and harm from alcohol is related to alcohol accessibility as measured by the number of retail outlets and vendors per capita, hours and day of sale, and type of retailing system. Therefore, since the proposed change would increase the number of retail outlets and type of retailing system, COMOH is not supportive of extending the hours for retail sales and sampling to 6am from 9am. Allowing retail sales at a farmers market starting at 9am equates to the provision of an alternate venue for purchase; whereas extending the hours of retail sale to 6am is the addition of hours of sale. These two concepts are very different.
- 3. COMOH expects that this alternative venue for the purchase of alcohol is limited to only VQA wines and to farmers markets. Our concern is that this initiative does not become an argument to promote more widespread alcohol sales at such locations as corner stores and gas stations. We are very much opposed to such further expansion. Alcohol is not an ordinary commodity and should not be treated as such.
- 4. Alcohol is responsible for the second highest rate of death and disease in Canada following tobacco. Its negative impacts on public safety and community well-being are well documented including homicides, suicides, assaults, fires, drownings, and falls. The huge human and health care costs associated with alcohol consumption are recognized by the Ministry of Health and

Long-Term Care (MOHLTC) and by local boards of health. As part of their financial and accountability agreements, local boards of health must report annually to the MOHLTC on the rates of adherence to low-risk drinking guidelines. Notwithstanding competing pressures and priorities, government policies should strive to work in concert to support the health of all Ontarians.

We are grateful for the opportunity to provide comment. Even though timelines are tight, we would also be pleased to provide public health input to the development of educational materials.

Appendix C

Current VQA wine retailers in Middlesex County and London Ontario

#	Address	City	State	Postal Code	Name
1	71 York	London	ON	N6A1A6	LCBO
2	85 Wellington Road	London	ON	N6C4M7	LCBO
3	301 Oxford Street West	London	ON	N6H1S6	LCBO
4	900 Oxford Street East	London	ON	N5Y5A1	LCBO
5	3050 Wonderland Road				
	South	London	ON	N6L1A6	LCBO
6	1225 Wonderland road				
	North	London	ON	N6G2V9	LCBO
7	1073 Wellington South	London	ON	N6E1W4	LCBO
8	109 Fanshawe Park Road	London	ON	N5X 3W1	LCBO
9	1240 Commissioner's Road	London	ON	N6K 1C7	LCBO
10	348 Clark Road	London	ON	N5W 6G4	LCBO
11	2490 Main Street	London	ON	N6P 1R2	LCBO
12	4349 Hamilton Road	Dorchester	ON	N0L 1G3	LCBO
13	196 Main Street	Lucan	ON	N0M 2J0	LCBO
14	70 Carroll Street	Strathroy	ON	N7G 4G2	LCBO
15	264 Main Street	Parkhill	ON	N0M 2K0	LCBO
16	228 Currie Street	Glencoe	ON	NOL 1M0	LCBO
17	157 Main Street	Ailsa Craig	ON	NOM 1A0	Agency Store
18	21933 Melbourne Road	Melbourne	ON	NOL 1TO	Agency Store
19	22482 Adelaide Road	Mount Brydges	ON	N0L 1W0	Agency Store
20	22789 Hagarty Road	Newbury	ON	N0L1Z0	Agency Store
21	184 King Street	Thorndale	ON	N0M 2P0	Agency Store
22	1080 Adelaide street North	London	ON	N5Y 2N1	Wine Rack
23	1280 Fanshawe Park Road	20114011	011	1,0121,1	VI IIIO ZUMOIE
	West	London	ON	N6G 5B1	Wine Rack
24	155 Clarke Side Road	London	ON	N5W 5C9	Wine Rack
25	1275 Highbury Ave.	London	ON	N5Y 1A8	Wine Rack
26	1205 Oxford Street west	London	ON	N6H 1V8	Wine Rack
27	825 Oxford Street east	London	ON	N5Y 3J8	Wine Rack
28	743 Richmond Street	London	ON	N6A 5C7	Wine Rack
29	626 Victoria	Strathroy	ON	N7G 3C1	Wine Rack
30	395 Wellington Street	London	ON	N6C 5Z6	Wine Shop
31	1030 Adelaide Street North	London	ON	ON N5Y	Wine Shop
32	1244 Commissioners Road	London	ON	N6K 1C7	Wine Shop
33	3040 Wonderland Road	Zondon	311	1,011 10,	., me snop
55	South	London	ON	N6L 1A6	Wine Shop
34	1595 Adelaide Street north	London	ON	N5X 4E8	Colio Estate
Craft	1270 Haciardo Succe north	Zondon		11021 120	Bellamere
winery	1260 Gainsborough Rd	London	ON	N6H 5K8	Winery
Craft				1.011 0110	Carolinian
winery	4823 Dundas St.	Dorchester	ON	N0M 2P0	Winery



