

Hon. Doug Ford, Premier of Ontario  
Office of the Premier  
Legislative Building  
Queen's Park  
Toronto ON M7A 1A1

May 13, 2024

**Re: AN ONTARIO ALCOHOL STRATEGY IS URGENTLY NEEDED**

Dear Premier Ford,

We are calling on the Government of Ontario to develop and implement a comprehensive alcohol strategy in collaboration with a multi-disciplinary panel of experts, including local public health, community-based organizations, and people with lived experience.

Alcohol is more harmful to our health than previously known. Even at small amounts of drinking, alcohol can harm individuals in a number of ways, and is associated with a variety of health harms, both acute and chronic.<sup>1</sup>

Ontario does not have a coordinated action plan for policy interventions to reduce the harms from alcohol use. Implementing a comprehensive strategy will reduce alcohol-related harm through evidence-based policies in the areas of pricing and taxation, physical availability, alcohol distribution system, impaired driving, marketing controls, treatment, and accountability through monitoring and reporting. The call for an Ontario alcohol strategy has been made previously by leading organizations serving our communities, and most recently by the Chief Medical Officer of Health's Annual Report (March 28, 2024).

We would like to draw your attention to the following reasons why an alcohol strategy and action plan is so urgently needed:

- Alcohol is widely consumed in Ontario, causing a variety of harms to consumers, their families and communities.
- Alcohol costs more than \$7 billion annually, which is greater than the costs of harms from tobacco and opioids combined – further adding to government debt.
- Implementing a well-designed provincial alcohol strategy would help Ontario regain its reputation as a national alcohol policy leader.
- The Government of Ontario has a duty to support healthy and safe communities. The Government of Ontario's own [Roadmap to Wellness](#) has identified the need for investments in substance use services, from prevention to intensive treatment.

The need to build and fund an alcohol strategy with a whole-of-government approach that puts health, safety and fiscal responsibility before commercial interests is urgent. People in Ontario are experiencing significant harms from alcohol use and the financial costs to the province are staggering. Immediate action is required to develop and implement responsible, evidence-based policies to reduce harms from alcohol use.

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<sup>1</sup> [https://www.ccsa.ca/sites/default/files/2023-01/CCSA\\_Canadas\\_Guidance\\_on\\_Alcohol\\_and\\_Health\\_Final\\_Report\\_en.pdf](https://www.ccsa.ca/sites/default/files/2023-01/CCSA_Canadas_Guidance_on_Alcohol_and_Health_Final_Report_en.pdf)

Further information and evidence supporting the above statements can be found in the attached evidence brief, *The Need for a Provincial Alcohol Strategy in Ontario*.

Yours truly,



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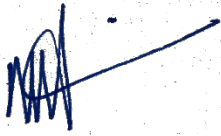
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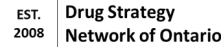
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Hon. Stan Cho, Minister of Long-Term Care

Hon. Prabmeet Singh Sarkaria, Minister of Transportation

Hon. Michael S. Kerzner, Solicitor General of Ontario

Dr. Kieran Moore, Chief Medical Officer of Health and Assistant Deputy Minister



# The Need for a Provincial Alcohol Strategy in Ontario

## Evidence Brief

Alcohol is more harmful to our health than previously known. Even at small amounts of drinking, alcohol can harm individuals in a number of ways, and is associated with a variety of acute and chronic health harms. Ontario does not have a coordinated action plan for reducing harms from alcohol use. There is an urgent need to build and fund an alcohol strategy with a whole-of-government approach that puts health, safety and fiscal responsibility before commercial interests. The call for an Ontario alcohol strategy has been made previously by leading organizations serving our communities, and most recently by the Chief Medical Officer of Health's Annual Report.

Alcohol is costing the province more than what it receives in revenue from sales. In Ontario, alcohol led to 6,202 deaths, 319,580 hospital admissions and 38,043 years of productive life lost in 2020. Costs of harms from alcohol is more than \$7 billion annually, further adding to government debt. A fiscally responsible approach that will reduce harms and improve safety is needed, especially when the healthcare system is struggling to meet demands. Recently proposed policy changes by Ontario will introduce up to 8,500 new stores, including convenience stores, where alcohol can be purchased by January 2026, an increase of up to 400%. Governments have a duty to support healthy and safe communities, including socially responsible pricing of alcoholic beverages, limits on the number of retail outlets and hours of sale, and alcohol advertising controls. Implementing a well-designed provincial alcohol strategy would help Ontario regain its reputation as a national alcohol policy leader.

# KEY CONSIDERATIONS

## Alcohol is widely consumed in Ontario, causing a variety of harms.

About 8 of 10 Ontarians report drinking alcohol in the past year, and 48% report drinking above what is considered low-risk (i.e., more than 2 drinks a week).<sup>1,2,3</sup> The number of people drinking alcohol in amounts that increase risk to health is estimated to be much higher than the self-reported number. Alcohol consumption was higher in Ontario on a per-capita basis than in other provinces during the COVID-19 pandemic.<sup>4</sup>

Even at small amounts, alcohol use can impact individuals in a number of ways. It is associated with a variety of health harms, both acute and chronic.<sup>5</sup> It is known to play a causal role in more than 200 disease and injury conditions, including liver cirrhosis, cardiovascular disease, alcohol use disorder and at least nine cancers.<sup>6,7</sup> In Ontario, alcohol led to 6,202 deaths, 319,580 hospital admissions and 38,043 years of productive life lost in 2020.<sup>8,9</sup> The urgent need for action at the provincial level to reduce harms from alcohol use is supported by the recommendations on alcohol in the Chief Medical Officer of Health of Ontario's (CMOH) 2023 Annual Report.<sup>4</sup>



About a third of Ontarians experience harm as a result of someone else's drinking in any given year, which highlights the "secondhand" effects of alcohol.<sup>10,11</sup> Alcohol-attributable criminal justice costs were an estimated \$1.53 billion for 2020.<sup>7</sup> Nationally, alcohol use also accounts for nearly 40% of all criminal justice costs related to substance use, due to its role in violent and non-violent crime and impaired driving.<sup>4</sup> When the network of private alcohol outlets was expanded in British Columbia, there was an increase in overall alcohol consumption and alcohol-caused harm, including mortality.<sup>12,13</sup> In both B.C. and Alberta, private alcohol retailers may be less likely than government-owned retail locations to curtail sales to underage persons. In Alberta, the privatization of alcohol sales was linked to higher mortality rates from suicide as well as property crimes like break-ins.<sup>14</sup>

As of January 2024, there were 2,135 off-premise retail outlets – LCBO, Beer Store, wine shops and supermarket outlets – selling alcohol in Ontario.<sup>15</sup> A study comparing the number of emergency visits attributable to alcohol in the two years before alcohol was introduced into grocery stores (2013 and 2014) in Ontario with the number of emergency visits attributable to alcohol in the two years post (2016 and 2017) revealed that the number of visits had increased by more than 24,000.<sup>16</sup>



Recently proposed policy changes in Ontario will likely lead to increased alcohol-related harm. By January 2026, the government will introduce up to 8,500 new stores (including convenience stores) where alcohol can be purchased, an increase of up to 400%.<sup>17</sup> It is also possible that prices will decrease. Based on what we know from decades of research and from recent history with alcohol expansion in Ontario, we can expect to see an increase in alcohol-related harms as a result.<sup>6,18,19</sup> This change will further strain an already overstretched healthcare system. In fact, every year we are likely to see thousands of added hospitalizations and hundreds of alcohol-attributable deaths.

### **The growing deficit from alcohol will add to government debt.**

Ontario loses \$0.33 for every drink sold.<sup>20</sup> Alcohol is costing the province more than what it receives in revenue from sales. Although Ontario generated \$5.1 billion in revenue from alcohol sales in 2020, direct costs were about \$7.1 billion, which is a net deficit of \$2 billion.<sup>5,21</sup> With privatization, the government will lose further on sales revenues generated previously by the Liquor Control Board of Ontario.<sup>9,12,22,23</sup> Without a comprehensive alcohol strategy that takes these factors into account, it's likely that this deficit from alcohol will continue to grow.



## Implementing a well-designed provincial alcohol strategy would help Ontario regain its reputation as a national alcohol policy leader.

Ontario has historically recognized that alcohol is not an ordinary product and placed a degree of control over its production and distribution to mitigate harm. Ontario used to be a national leader in many alcohol policy areas, with many promising practices in place, such as restrictions in the number of alcohol retail outlets and hours of operation, but we are rapidly losing ground.<sup>11</sup> The Canadian Alcohol Policy Evaluation Project (2023), which compares multiple policy domains across all provinces and territories, gives Ontario a failing grade overall, including for the lack of a standalone alcohol strategy.<sup>6</sup>

Recent developments suggest a heavy focus on commercial and industry interests eroding effective, well-researched controls that protect people and communities. Ontario has often stated a commitment to ensuring a socially responsible approach to alcohol, but it is falling short by not having an alcohol strategy to fulfill its commitments. Furthermore, the current policy-making process does not appear to include an assessment of the impact to health and safety, and costs associated with alcohol-harms before policy changes are made. The Government of Ontario's own [Roadmap to Wellness](#) has identified the need for investments in substance use services, from prevention to intensive treatment.<sup>24</sup>

## Governments have a duty to support healthy and safe communities.

Research clearly shows that policy tools designed to influence alcohol consumption levels and patterns can reduce the burden of death, disease, disability, and social disruption from alcohol.<sup>9</sup> Among the most effective interventions are socially responsible pricing of alcoholic beverages, limits on the number of retail outlets and hours of sale, and advertising/ marketing controls. These interventions are among the key recommendations by the CMOH in the 2023 annual report. These types of policies have been consistently shown to help reduce alcohol-related problems when implemented alongside more targeted interventions such as in-store signage and government health and safety campaigns which provide critical information that allow consumers to make informed choices about alcohol consumption.

Reducing alcohol-related harms include policies and strategies to prevent drinking and driving, enforcement of the minimum legal drinking age, as well as engaging clients in screening, brief intervention and referral activities in the primary care setting.<sup>9,25,26</sup> Planned changes to decrease public ownership of alcohol retail by allowing increased private interests in off-premise alcohol sales will weaken policies that have been in place to reduce harms.<sup>13</sup> Furthermore, it will make it even more challenging for persons with lived experience of alcohol use disorder to avoid inducements to buy alcohol.

The need for a fiscally responsible approach that will reduce harms and improve safety is particularly acute when the healthcare system is currently struggling to meet demands. The mortality rate is 5x higher for those presenting to emergency departments at least twice in one year for alcohol related reasons, compared to the average mortality rate in Canada.<sup>27,28</sup>

## A provincial alcohol strategy is needed, with a whole-of-government approach and in collaboration with health organizations.

Over the years, many voices from across Ontario’s health sector have called for a comprehensive alcohol strategy.<sup>29,30,31</sup> It is imperative that Ontario commits to an approach to alcohol policy that prioritizes health and safety and considers the costs associated with alcohol consumption. Such an approach is critical to our health and well-being. Our organizations believe that a provincial alcohol strategy is the best way to achieve this.

We look forward to collaborating with the Government of Ontario on the development and implementation of a comprehensive alcohol strategy to ensure that the approach prioritizes public health and harm reduction, reduces costs, and minimizes the negative impact to those most at risk and our communities.

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<sup>1</sup> Public Health Ontario. 2023. Burden of health conditions attributable to smoking and alcohol by public health unit in Ontario. Toronto, ON.

<sup>2</sup> Statistics Canada. 2024. Table 13-10-0096-11 Heavy drinking, by age group. Available from <https://doi.org/10.25318/1310009601-eng>

<sup>3</sup> Government of Canada. 2023. Canadian Alcohol and Drugs Survey (CADS): summary of results for 2019. Available from <https://www.canada.ca/en/health-canada/services/canadian-alcohol-drugs-survey/2019-summary.html>

<sup>4</sup> Government of Ontario. 2023 Annual Report of the Chief Medical Officer of Health of Ontario to the Legislative Assembly of Ontario. Balancing act: An all-of-society approach to substance use and harms. Available from <https://www.ontario.ca/files/2024-04/moh-cmoh-annual-report-2023-en-2024-04-02.pdf>

<sup>5</sup> Paradis C, Butt P, Shield K, Poole N, Wells S, et al. 2023. Canada’s Guidance on Alcohol and Health: Final Report. Ottawa, ON: Canadian Centre on Substance Use and Addiction

<sup>6</sup> Public Health Agency of Canada. 2015. The Chief Public Health Officer’s Report on the State of Public Health in Canada 2015: Alcohol Consumption in Canada. Available from <https://www.canada.ca/en/public-health/services/publications/chief-public-health-officer-reports-state-public-health-canada/2015-alcohol-consumption-canada.html>

<sup>7</sup> Babor TF, Caswell S, Graham K, Huckle H, Livingston M, et al., 2023. Alcohol: No ordinary commodity (3rd ed.). Oxford University Press.

<sup>8</sup> Canadian Substance Use Costs and Harms Scientific Working Group. 2023. Canadian substance use costs and harms 2007–2020. Ottawa: Canadian Centre on Substance Use and Addiction.

<sup>9</sup> Naimi T, Stockwell T, Giesbrecht N, Wettlaufer A, Vallance K, et al. 2023. Canadian Alcohol Policy Evaluation (CAPE) 3.0 Project. Policy domain results summary (provincial/territorial). Victoria, BC: University of Victoria, Canadian Institute for Substance Use Research.

<sup>10</sup> Giesbrecht N, Cukier S, Steeves D. 2010. Collateral damage from alcohol: implications of ‘second-hand effects of drinking’ for populations and health priorities. *Addiction*, 105(8), 1323–1325.

<sup>11</sup> Nayak MB, Patterson D, Wilsnack SC, Karriker-Jaffe KJ, & Greenfield TK. 2019. Alcohol’s secondhand harms in the United States: new data on prevalence and risk factors. *Journal of Studies on Alcohol and Drugs*, 80(3), 273-281.

<sup>12</sup> Stockwell T, Zhao J, MacDonald S, Pakula B, Gruenewald P, & Holder H. 2009. Changes in per capita alcohol sales during the partial privatization of British Columbia’s retail alcohol monopoly 2003–2008: a multi-level local area analysis. *Addiction*, 104(11), 1827–36.



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- <sup>20</sup> Naimi T, Stockwell T, Giesbrecht N, Wettlaufer A, Vallance K, et al. 2023. Canadian Alcohol Policy Evaluation 3.0: Results from Ontario. Victoria, BC: Canadian Institute for Substance Use Research, University of Victoria.
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- <sup>31</sup> Canadian Alcohol Policy Evaluation. 2023 [Canadian Alcohol Policy Evaluation \(CAPE\) 3.0: results from Ontario \(uvic.ca\)](https://www.ualberta.ca/~cape/)