



Registered Nurses' Association of Ontario  
L'Association des infirmières et infirmiers  
autorisés de l'Ontario

Hon. Victor Fedeli  
Minister of Finance  
Frost Building South, 7th Floor  
7 Queen's Park Cres.  
Toronto, ON M7A 1Y7

Hon. Christine Elliott  
Minister of Health and Long-Term Care  
College Park 777 Bay St., 5<sup>th</sup> Floor  
Toronto, ON M7A 2J3

April 25, 2019

**Re: Alcohol policy: Choose health and safety over increasing sales, access and convenience**

Dear Minister Fedeli and Minister Elliott,

The Registered Nurses' Association of Ontario (RNAO) is concerned that the government's reform of alcohol policy to "modernize" alcohol sales<sup>1 2</sup> is a danger to health and safety. RNAO agrees with the title of your *2019 Ontario Budget: Protecting What Matters Most*<sup>3</sup> and believes that what matters most is protecting the health and safety of the people of Ontario.

The research is clear and convincing: alcohol is a leading cause of death, disease and disability globally<sup>4</sup> and in Canada.<sup>5</sup> It is not just alcohol poisoning, alcohol use disorder, and motor vehicle crashes that put people at risk. There is a causal relationship between alcohol consumption and more than 200 health conditions.<sup>6</sup> Alcohol is a class 1 carcinogen so the World Health Organization (WHO) and the Canadian Cancer Society warn there is "no safe limit of alcohol consumption when it comes to cancer prevention."<sup>7</sup> In Canada in 2015-2016, there were more people hospitalized for causes directly attributable to alcohol than for heart attacks.<sup>8</sup> Not only the individual using alcohol is impacted by its use. One in three Ontarians experience harm due to someone else's drinking.<sup>9</sup>

Increasing availability of alcohol is linked with increased consumption and increased health and social harms. Before the last government introduced changes to increase access, 75 per cent of Ontarians already lived within a ten minute commute of an alcohol retail outlet.<sup>10</sup> At that time, RNAO argued in the media<sup>11</sup> and to the government<sup>12</sup> that public policy was moving in the wrong direction. The preliminary research has confirmed fears about the impact of allowing beer, wine, and cider sales in grocery stores, permitting wine and cider to be sold at local farmers' markets, and enabling the Liquor Control Board of Ontario (LCBO) to launch and expand its e-commerce platform with delivery options.

Between 2014 (pre-deregulation) and 2016-2017 (post-deregulation), alcohol-attributed emergency department (ED) visits increased 17.8 per cent, over twice the rate of increase for all ED visits.<sup>13</sup> Increased hours of operation and number of alcohol outlets were positively associated with higher rates of alcohol-attributable ED visits.<sup>14</sup>

In addition to driving negative health and safety outcomes, alcohol policy in Ontario also has economic implications. In 2014, the estimated cost of alcohol use in Ontario was \$5.3 billion/year,<sup>15</sup> which is well above the revenue accruing to the provincial government from alcohol. The annual costs directly attributed to alcohol-related harms include health care, law enforcement, corrections, lost productivity due to short- and long-term disability, and premature mortality.<sup>16</sup>

Public policy interventions to reduce harm from alcohol are well established. A recent national evaluation of alcohol policies across all the provinces and territories gave Canada an overall failing grade of F.<sup>17 18</sup> When comparing harm reduction policies for alcohol across jurisdictions for 2017, Ontario ranked the highest (or relative best) at C while Alberta received D and Québec received D-.<sup>19</sup> These grades are congruent with Ontario having the fewest alcohol retail outlets per capita in Canada (2.4 per 10,000 people), Alberta having 6.4 per 10,000 people, and Québec having 12.2 per 10,000 people.<sup>20</sup>

Alberta and Québec are not models to replicate from a health perspective. Both of those jurisdictions have higher alcohol sales (absolute volume for total per capita sales) and higher heavy drinking by self-report than Ontario.<sup>21</sup> While Ontario and Québec had similar age-standardized rates for hospitalizations entirely caused by alcohol at 195 per 100,000 and 183 per 100,000 respectively, Alberta's was significantly higher at 327 per 100,000.<sup>22</sup>

RNAO is not arguing for prohibition. We are urging the adoption of an evidence-based approach to reduce the harms that alcohol causes to individuals, families, and communities. Alcohol is not an ordinary commodity<sup>23</sup> and must not be treated as such. The Ontario budget 2019 says the "government is committed to respecting adult consumers by trusting them to make responsible choices that work for them." This philosophy works well for selling vegetables. It does not work for selling nuclear weapons, people as slaves, and alcohol.

### **RNAO recommendations:**

1. Evidence-informed alcohol policy needs a whole-of-government approach led by the Ministry of Health and Long-Term Care rather than the Ministry of Finance.
2. Ontario needs a provincial alcohol strategy that prioritizes health and safety over other considerations such as promoting sales by increasing access, escalating convenience, and lowering prices.
3. A public health approach to alcohol includes the following approaches to mitigate harm:

- roll back privatization initiatives and establish a moratorium on further privatization of alcohol sales. Instead of increasing physical availability of alcohol by increasing density of outlets, extending hours for sales and consumption, and allowing over-concentration of alcohol outlets, strengthen LCBO and its government monopoly of retail sales;
- strengthen Ontario's minimum pricing structure by raising minimum prices, indexing alcohol prices to inflation, linking prices to alcohol content so that as alcohol content rises so does price, and close loopholes to the minimum price;
- implement WHO recommendations to ban alcohol advertising, promotion, and marketing. Immediately prohibit alcohol promotion targeted to youth, including scholarships, and sponsorship. Update advertising regulations so they apply to all forms of media including social, internet, radio, TV, and print.

Thank you for considering these recommendations which we urge you to implement. RNAO would be pleased to continue this conversation in support of public policies that will make our province a safer and healthier place for all Ontarians.

Warm regards,



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Chief Executive Officer, RNAO

Hon. Doug Ford, Premier  
Andrea Horwath, Leader, Official Opposition  
John Fraser, Interim Leader, Ontario Liberal Party  
Mike Schreiner, Leader, Green Party of Ontario  
Doug Downey, Parliamentary Assistant to the Minister of Finance  
Robin Martin, Parliamentary Assistant to the Minister of Health and Long-Term Care

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<sup>1</sup> Ministry of Finance (2018, Nov. 15). Backgrounder: Saving money, while improving choice and convenience for beer and wine consumers. <https://www.fin.gov.on.ca/fallstatement/2018/fes18-beer-and-wine-en.pdf>

<sup>2</sup> Ministry of Finance (2018, Dec. 13). Media release: Ontario launches consultations on alcohol choice and convenience. <https://news.ontario.ca/mof/en/2018/12/ontario-launches-consultations-on-alcohol-choice-convenience.html>

<sup>3</sup> Ministry of Finance (2019, April 11). *2019 Ontario Budget: Protecting What Matters Most*. Toronto: Author. <http://budget.ontario.ca/pdf/2019/2019-ontario-budget-en.pdf>

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- <sup>4</sup> World Health Organization (2018). *Global status report on alcohol and health 2018*. Geneva: Author. <https://apps.who.int/iris/bitstream/handle/10665/274603/9789241565639-eng.pdf?ua=1>
- <sup>5</sup> Public Health Agency of Canada (PHAC) (2015). *The Chief Public Health Officer's report on the state of public health in Canada 2015: Alcohol consumption in Canada*. Ottawa: Author. <https://www.canada.ca/content/dam/canada/health-canada/migration/healthy-canadians/publications/departement-ministere/state-public-health-alcohol-2015-etat-sante-publique-alcool/alt/state-phac-alcohol-2015-etat-aspc-alcool-eng.pdf>
- <sup>6</sup> PHAC, 4.
- <sup>7</sup> PHAC, 6.
- <sup>8</sup> Canadian Institute for Health Information (CIHI) (2017). *Alcohol harm in Canada: Examining hospitalizations entirely caused by alcohol and strategies to reduce alcohol harm*. Ottawa: Author, 6. <https://www.cihi.ca/sites/default/files/document/report-alcohol-hospitalizations-en-web.pdf>
- <sup>9</sup> Ontario Public Health Association (2018). Infographic: Since we have been waiting for a provincial alcohol strategy. Toronto: Author. [https://opha.on.ca/getattachment/Events-News-and-Media/News/Provincial-Alcohol-Strategy/Alcohol-INFOGRAPHIC-\(1\).png.aspx](https://opha.on.ca/getattachment/Events-News-and-Media/News/Provincial-Alcohol-Strategy/Alcohol-INFOGRAPHIC-(1).png.aspx)
- <sup>10</sup> Giesbrecht, N. & Wettlaufer, A. (2013). *Reducing alcohol-related harms and costs in Ontario: A provincial summary report*. Toronto: Centre for Addiction and Mental Health, 5.
- <sup>11</sup> Grinspun, D. (2015, July 29). Op-ed: Taking off the beer goggles to put public health ahead of politics. *Hamilton Spectator*. <https://www.thespec.com/opinion-story/5764330-taking-off-the-beer-goggles-to-put-public-health-ahead-of-politics/>
- <sup>12</sup> Registered Nurses' Association of Ontario (2016, March 3). Letter to Premier Wynne: RNAO urges province to use public health evidence to inform a comprehensive provincial alcohol strategy. [https://rnao.ca/sites/rnao-ca/files/RNAO\\_to\\_Premier\\_alcohol\\_policy\\_march\\_3\\_2016\\_final.pdf](https://rnao.ca/sites/rnao-ca/files/RNAO_to_Premier_alcohol_policy_march_3_2016_final.pdf)
- <sup>13</sup> Myran, D., Chen, J., Giesbrecht, N. & Rees, V. (2019, March 29). The association between alcohol access and alcohol-attributable emergency department visits in Ontario, Canada. *Addiction*. doi: 10.1111/add.14597
- <sup>14</sup> Myran, Chen, Giesbrecht, & Rees.
- <sup>15</sup> Canadian Substance Use Costs and Harms Scientific Working Group (2018). *Canadian substance use costs and harms in the provinces and territories (2007-2014)*. Ottawa: Canadian Centre on Substance Use and Addiction, 20-21. <http://www.ccdus.ca/Resource%20Library/CSUCH-Canadian-Substance-Use-Costs-Harms-Provincial-Territorial-Report-2018-en.pdf>
- <sup>16</sup> Canadian Substance Use Costs and Harms Scientific Working Group, *Canadian substance use costs and harms, 2007-2014*. Ottawa: Canadian Centre on Substance Use and Addiction 1-4.
- <sup>17</sup> Canadian Institute for Substance Use Research (CISUR). (2019, Feb. 20). Media release: Canadian alcohol policy gets failing grade. Victoria: CISUR, University of Victoria. <https://www.uvic.ca/research/centres/cisur/about/news/current/canadian-alcohol-policy-gets-failing-grade.php>
- <sup>18</sup> Canadian Institute for Substance Use Research (2019). Canadian Alcohol Policy Evaluation (CAPE). Victoria: Canadian Institute for Substance Use Research, University of Victoria. <https://www.uvic.ca/research/centres/cisur/projects/active/projects/canadian-alcohol-policy-evaluation.php>
- <sup>19</sup> Stockwell, T., Wettlaufer, A., Vallance, K., et al. (2019). *Strategies to reduce alcohol-related harms and costs in Canada: A review of provincial and territorial policies*. Victoria: Canadian Institute for Substance Use Research, University of Victoria, 98. <https://www.uvic.ca/research/centres/cisur/assets/docs/report-cape-pt-en.pdf>
- <sup>20</sup> Ministry of Finance, *2019 Ontario Budget*, 83.
- <sup>21</sup> CIHI, 12.
- <sup>22</sup> CIHI, 14.
- <sup>23</sup> Babor, T., Caetano, R., Casswell, S. et al. (2010). *Alcohol: No Ordinary Commodity: Research and Public Policy*. New York: Oxford University Press.