



March 11, 2021

Alcohol and Gaming Commission of Ontario
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RE: Liquor Sales Licence Applications for 7-Eleven Canada, Inc.

To whom it may concern,

The Southwest Rethink Your Drinking Working Group (SWRYD) is submitting an objection to the 61 liquor sales licence applications made to the Ontario Alcohol and Gaming Commission of Ontario by 7-Eleven Canada, Inc. The SWRYD group is a collaborative effort among seven Southwestern Ontario Public Health Units to prevent and reduce harms related to alcohol use in our communities. Several concerns surrounding these liquor sales licence applications are included within this letter. The harms of increased access and use of alcohol are well documented and must be considered when reviewing licence applications for the convenience store setting.

The SWRYD group supports the recommendations made by the Provincial and Territorial Canadian Alcohol Policy Evaluation project regarding alcohol sales in corner stores. In a rigorous evaluation of current alcohol policies across Canada against evidence-based best practices known to reduce alcohol use and harms, it was recommended that Ontario should NOT proceed with announced plans to sell beer and wine in corner stores or increase the number of grocery outlets. Instead, Ontario should implement legislation to limit the density of drinking establishments and retail stores with restrictions on the number or location of outlets and establish policies to enhance safety in and around outlets.¹

Following the last substantial expansion of alcohol sales in Ontario in 2015, deregulation of alcohol sales in Ontario has already greatly increased access to alcohol and has disproportionately increased access to some of the most vulnerable residents in lower-socioeconomic status neighbourhoods.² Due to the mental, physical, and social harms directly related to alcohol, it is responsible for the highest amount of healthcare, lost-productivity, criminal justice, and other costs each year in Canada compared to all other substances.³ Since the start of the COVID-19 pandemic, social and economic conditions of the pandemic, and further deregulation and promotion of sales of alcohol have led to a substantial increase in alcohol drinking behavior. Policies that restrict alcohol outlet density are associated with decreases in alcohol consumption and harms from alcohol.⁴ Expanding the availability of alcohol to some convenience stores will have negative impacts on the health and safety of our communities.

The Health, Social, and Financial Burden of Alcohol Use

Due to the pervasive social acceptability of alcohol in Canadian society, the adverse effects of alcohol are not only tolerated, but denied or defended as harmless fun.^{5,6} According to the World Health Organization, out of a list of 26 risk factors, alcohol is the second leading global risk factor of death, disease, and disability.⁷ Alcohol use is known to cause more harm in developed nations, such as Canada, compared to developing ones.⁸ Alcohol consumption can result in a decrease in life expectancy by two years and is associated with diabetes, hypertension, heart disease, stroke, lower respiratory tract infections, and HIV. In addition, alcohol use is related to nearly 3000 cases of cancer each year in Ontario.⁹

Alcohol consumption is also linked to harms such as injury, trauma, and violence. Hundreds of Canadians die each year as a result of an alcohol-related collision. It is also related to injuries and trauma such as fires, falls, drownings as well as domestic violence and sexual abuse.¹⁰ Furthermore, alcohol consumption is closely tied to mental well-being and increases the risk of suicide. Soon after drinking alcohol, there is an increased risk of a suicide attempt by roughly seven times, and this risk increases to 37 times after the heavy drinking of alcohol.¹¹

Previous research on the health benefits from moderate alcohol consumption has been overestimated, while health risks have been underestimated.^{12,13} Recent research shows there is no safe level of alcohol consumption, and there are no health benefits arising from alcohol use.^{14,15} In fact, significant harms are associated with even low levels of alcohol consumption.¹⁶ While any amount of alcohol can cause harm, Canada has developed Low-Risk Drinking Guidelines (LRDG) to help Canadians moderate their alcohol consumption. Public Health Units often promote the LRDG to support a culture of moderation. There are many individual harms due to drinking alcohol, but the consequences experienced by society are often overlooked. Increased harmful drinking has significant social consequences, such as crime, unemployment, and absenteeism.¹⁷ Harmful drinking impacts more than just the drinker. Some of these harms include injuries related to assault, workplace incidents, motor vehicle collisions, family disruption, violence, abuse, and lost income.¹⁸ Each year in Ontario, approximately one-third of Ontarians experience harms caused by another individual's drinking.¹⁹

While alcohol sales may be seen as an economic driver, the costs associated with alcohol use far exceed revenues.²⁰ Annually, alcohol accounts for the highest amount of costs to Canada, compared to all other substances. In 2017, alcohol was the second leading cause of substance-related death, following tobacco. The number of alcohol deaths (18,320) was over double the amount from all other substances combined (8,872). Costs attributed directly to alcohol-related harms have been increasing year over year, and for 2017 are estimated to be \$16.6 billion: \$5.4 billion in health care costs, \$6.7 billion in indirect costs such as lost productivity, \$2.8 billion in criminal justice costs, and \$1.7 billion in other direct costs such as research and prevention, fire and damage to motor vehicles, and other workplace costs.²¹

Increased Use of Alcohol and Further Deregulation of Sales During the COVID-19 Pandemic

The recent deregulation of alcohol sales in Ontario as a response to the COVID-19 pandemic, and the social and economic conditions of the pandemic have led to an increase in drinking behavior for Ontarians, especially for those already struggling with addiction or mental health issues. National surveys have confirmed that the economic and social hardships created by the COVID-19 pandemic have negatively impacted mental health and increased levels of alcohol

use. At the end of March, 2020, a survey commissioned by the Canadian Centre on Substance Use and Addiction (CCSA) found that 25% of Canadians (aged 35–54) and 21% of Canadians (aged 18–34) say they have increased the amount of alcohol they drink since the start of the pandemic, due to a lack of regular schedule, boredom and stress.²² In another survey commissioned by the CCSA and the Mental Health Commission of Canada (MHCC) in the fall of 2020, respondents reported more mental health symptoms and increased substance use since March 2020. People with a history of mental health or substance use concerns were disproportionately impacted by stresses related to COVID-19. Around one third of those surveyed who drink alcohol reported drinking more since the start of the pandemic, and this rate increased to almost one half among respondents with a history of substance use disorders.²³ Allowing convenience stores to sell would only further increase alcohol access and use in this already difficult time.

Risks and Harms of Expanding Access to Alcohol

The physical availability of alcohol is strongly related to alcohol use and associated harms.²⁴ The evidence outlined below provides a strong rationale against increasing the availability of alcohol in places such as convenience stores.

Outlet Density

Policies that restrict alcohol outlet density are associated with decreases in alcohol consumption and harms from alcohol.²⁵ Expanding the availability of alcohol to some convenience stores will have negative impacts on the health and safety of our communities. Harms associated with higher outlet density include increases in impaired driving, violence, and health harms such as diabetes, hypertension, heart disease, stroke, lower respiratory tract infections, cancer, and HIV.²⁶ These harms have been found to disproportionately impact certain populations, including youth, young adults, and people with a low socioeconomic status (SES). Additionally, youth and young adults are an important target for the substance industry as they are considered a source for new and long-term users.

Many studies have shown the burden of alcohol-related mortality and morbidity falls most heavily on people of low SES and that alcohol outlets are often concentrated in low-SES neighbourhoods, which may further contribute to alcohol harms in these communities.²⁷ Following the last substantial expansion of alcohol sales in Ontario in 2015, there was a 15% increase in the number of alcohol outlets. Researchers found that lower-socioeconomic status neighbourhoods had more alcohol outlets within 1000 metres compared to other neighbourhoods.²⁸ Placing limits on number of alcohol outlets and the hours of operation in low-SES neighborhoods offers an opportunity to reduce alcohol-related health inequities.

Evidence from tobacco retailers shows that convenient geographic locations influence where people buy products; a Canadian survey showed one third of respondents indicated they would smoke less if they had to travel further to buy cigarettes. According to the Canadian Convenience Stores Association, proximity of a convenience store to a person's home and workplace is key to their sales.²⁹ Similarly, easy access to products provides cues to use substances and promotes purchases among experimental and occasional users as well as those trying to quit, and those who have already quit and at risk of a relapse.³⁰ The findings of these tobacco studies can be applied to alcohol sales and consumption and thus it is important to regulate the number and location of alcohol retailers.

Hours of Sale

Many convenience stores operate 24 hours a day and seven days a week. If alcohol is offered during all operating hours, it would be significantly increasing the availability of alcohol and could lead to serious harms. Evidence from Canada and abroad indicates that longer hours and increasing the number of days one can purchase alcohol increases the likelihood of alcohol-related harms such as impaired driving, injury, assaults, and disease as well as heavy drinking.³¹ When hours of sale are limited or reduced, there is decreased alcohol consumption and improved public safety by reducing assaults, disorder, violence, motor vehicle accidents, and hospitalizations.³²

Risk of Co-Use

Most convenience stores already sell harmful legal substance products, such as tobacco and vapour products. The co-location of these products for consumption and/or sale can lead to co-use of substances (e.g., use of tobacco and alcohol). Co-use of alcohol and tobacco products can lead to increased risk for impaired driving or increase in smoking-related lung disease.³³ The co-location can also signify to individuals that the co-use of alcohol or tobacco is condoned or even encouraged. In the Government of Canada's Framework for cannabis legalization, they strongly recommended that the legal substance of tobacco, alcohol, or cannabis not be co-located.³⁴

Exposure to Advertising and Promotion

Increases in private retail outlets, such as convenience stores, can mean more exposure through a point-of-sale promotion at stores as well as more impulse buys and cues to purchase alcohol.³⁵ The increased exposure to marketing, along with the expansion of retail outlets, perpetuates the normalization of alcohol, and increases rates of use and associated harms. Exposure to alcohol marketing is associated with earlier initiation of use as well as increased consumption and harm, especially among young people.³⁶ Promotion also influences social situations that normalize drinking, which contributes to the downplaying of alcohol risks and harms.³⁷ This is important as when a substance is normalized and socially acceptable, people are more likely to use it and pressure others to use it.³⁸

Capacity to Regulate and Monitor Compliance

Expanding locations where alcohol is served or sold will require increased monitoring for compliance and potential enforcement actions. If alcohol is available at certain convenience stores, the capacity of various enforcement agencies will need to be increased in order to effectively regulate, monitor, and inspect these additional locations. Evidence around the importance of monitoring compliance can be learned from tobacco and vapour products.

Conclusion

The Southwest Rethink Your Drinking Working Group strongly recommends against the ability to purchase and/or consume alcohol in convenience stores. The negative health, economic, and social costs of alcohol consumption are well documented, and confronting as well as mitigating the harms to encourage responsible use of alcohol will require leadership, persistence, and support at all levels.

Thank you for considering these concerns in your assessment of the 7-Eleven liquor licence applications in Ontario.

Sincerely,

The Southwest Rethink Your Drinking Working Group

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Encl.

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