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Response of the Ontario Public Health Association to the consultation on proposed reforms to the Liquor Licence Act

The Ontario Public Health Association (OPHA) represents the interests of more than 3,000 community and public health practitioners across Ontario. The mission of OPHA 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. As such, we are pleased to provide input to the consultation on proposed changes to the Liquor Licence Act (LLA) with respect to **Regulation 719. Minimum Pricing**, and several other proposed changes.

Regulation 719

There is a large body of research literature that delineates the important role of pricing in preventing alcohol-related problems and costs (health care, legal/judicial and lost labour costs). According to this evidence, raising the price of alcohol works to moderate consumption levels. Thus a minimum floor price is essential. We encourage the Ministry of Government Services (MGS) to take this opportunity to make changes that have considerable support in the international research and policy community.

Beyond minimum pricing, OPHA strongly supports a pricing scheme linking cost to alcohol content, rather

than to the type of liquor (i.e. the price should not favour beer or wine). In this scenario, price would be linked to the amount of absolute alcohol in the beverage.

Experts in the field of substance misuse prevention in many countries (e.g. Australia) have focused advocacy efforts on the establishment of pricing schemes which take into account the quantity of alcohol in a beverage. Some refer to this as volumetric pricing.

As an example, lower alcohol beers would cost less than regular beer, and the highest price would apply to beer with the highest alcohol level. In the proposed minimum purchase price of \$2.00, this example would translate to \$2.00 for a low-alcohol beer, \$2.85 for a regular strength beverage, and \$3.90 for a stronger beverage. The base price of \$2.00 should be reviewed and adjusted periodically.

Other Proposed Changes Under the LLA

1. Gift Restrictions

The proposed actions in the gift restrictions section causes concern as this type of ruling can be easily abused by licensees. OPHA suggests that licensees not be allowed to purchase liquor for patrons under any circumstances.

The proposed signage is a positive measure. New regulations need to be supported with adequate enforcement measures to ensure licensees are complying and face penalties for non-compliance.

2. Sale of Wine/Beer by the Glass

The proposed actions in the sale of wine / beer by the glass should include a maximum number of drinks served per patron. In some jurisdictions, a 2- drink maximum per patron at wine and beer manufacturers' premises is enforced.

The OPHA is pleased to offer input on changes to the Liquor Licence Act and encourages the MGS to consult the Ontario Public Health system which is responsible for substance abuse prevention in communities that would be affected by the new policy measures.

Sincerely,

Dr. Garry Aslanyan
President