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Public Health Research, Education and  
Development (PHRED) Program

Charitable Registration  
Number 11924 8771 RR0001

September 22<sup>nd</sup>, 2010

The Honourable Deborah Matthews  
Minister of Health and Long-Term Care

The Honourable Margaret R. Best  
Minister of Health Promotion  
10<sup>th</sup> Floor, Hepburn Block  
80 Grosvenor Street  
Toronto, Ontario M7A 2C4

The Honourable Sandra Pupatello  
Minister of Economic Development and Trade  
8<sup>th</sup> Floor, Hearst Block  
900 Bay Street  
Toronto, Ontario M7A 2E1

Dear Honourable Ministers,

**Re: Protecting Ontario's alcohol and public health policies in negotiations on the proposed Canada-EU treaty**

As representatives of the Ontario Public Health Association (OPHA),<sup>1</sup> we are writing to express our concern that negotiations between Canada and the European Union (EU) towards a Comprehensive Economic and Trade Agreement (CETA), designed to be more far-reaching than NAFTA,<sup>1</sup> could threaten public health in Ontario. We are concerned that the proposed treaty could interfere with provincial governments' ability to implement policies that reduce the substantial social and economic harm caused by alcohol consumption. *We urge you to safeguard Ontario's alcohol policy flexibility so that it is not fettered by any new trade treaty provisions the current federal government may negotiate.* Ideally, beverage alcohol - and services and investments pertaining to beverage alcohol in Ontario - should be fully excluded from the application of the proposed Canada-EU treaty.

**Alcohol – a major public health issue**

While many of us derive pleasure from drinking alcohol, there is a growing recognition that alcohol is a drug that imposes a heavy, under-reported burden on public health and safety.

Fortunately, effective policies exist to address alcohol problems. Even in difficult financial circumstances, well-informed governments can implement policies that have been shown to be both effective and cost-efficient.<sup>1</sup> Generally, policies that increase alcohol consumption lead to higher levels of public harm, while policies that decrease consumption reduce harm.

One of the most effective ways to minimize alcohol-related harm is to maintain public alcohol retail distribution systems imbued with a strong duty of social responsibility.<sup>2</sup>

Regulating alcohol taxes and prices is another common and effective method for controlling alcohol-related health problems. Generally, increasing alcohol taxes reduces alcohol consumption and related harm, while increasing government revenues.<sup>3</sup>

The judicious implementation of these and other measures holds considerable promise for improving the health and social and economic well-being of Ontarians.

European CETA demands threaten health-based alcohol policy in Ontario

Unfortunately, the Canada-EU treaty negotiations threaten the activities and even the continued existence of Ontario's public alcohol monopoly (the Liquor Control Board of Ontario, LCBO) and could restrict Ontario's ability to implement pricing and other effective health-based alcohol policies. We have attached a backgrounder for your consideration that describes in some detail the rationale behind our concerns.

As Ministers of the Ontario Government, you have authority over many aspects of alcohol policy that are threatened by the Canada-EU negotiations even though they are within unquestioned provincial jurisdiction. As a first step toward addressing this serious issue, we recommend that you initiate a review of all European proposals and Canadian proposed offers to ensure that Ontario's ability to reduce alcohol-related harm remains unfettered. We also urge you to consult widely with regional Medical Officers of Health and other public health groups such as the Centre for Addiction and Mental Health and MADD Canada.

We would be grateful if you would meet with OPHA representatives at your earliest convenience to discuss how we could work together during this challenging period to promote health-based alcohol policy. We look forward to a positive response in relation to the issues outlined within this letter and the attached backgrounder.

Sincerely,



Liz Haugh  
President

c.c. Christine Elliott, MPP; Gerry Martiniuk, MPP; Peter Shurman, MPP; France Gélinas, MPP; Howard Hampton, MPP

## Endnotes

<sup>1</sup> The Ontario Public Health Association (OPHA), a not-for-profit organization formed in 1949, provides 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 the province. The OPHA Alcohol Workgroup advocates specifically for policies to reduce problems caused by alcohol consumption, the prevalence and gravity of which are similar to those caused by tobacco.

<sup>1</sup> European Commission, "Recommendation from the Commission to the Council in order to authorize the Commission to open negotiations for an economic integration agreement with Canada," Brussels, April 2, 2009.

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<sup>1</sup> Anderson, P., Chisholm, D., and Fuhr, D. (2009), Effectiveness and cost-effectiveness of policies and programmes to reduce the harm caused by alcohol, *Lancet* 373:2234-2246.

<sup>2</sup> Room, R. (2002) *Why Have a Retail Alcohol Monopoly?*, Paper presented at an International Seminar on Alcohol Retail Monopolies, Harrisburg, Pennsylvania, August 19-21, 2001.

See also:

Centre for Addition and Mental Health (2004) *Retail Alcohol Monopolies and Regulation: Preserving the Public Interest.*, available at:

[http://www.camh.net/Public\\_policy/Public\\_policy\\_papers/Retail%20Alcohol%20Monopolies%20Position%20Paper.pdf](http://www.camh.net/Public_policy/Public_policy_papers/Retail%20Alcohol%20Monopolies%20Position%20Paper.pdf), viewed 20 January 2010;

and

Ontario public health associations, *Alcohol and Public Health: The Implications of Changes to Ontario's Beverage Alcohol System*, submission to the Ontario Beverage Alcohol System Review Panel, 25 February 2005, available at

<http://www.faslink.org/OntarioBeverageAlcoholSystemReviewPublicHealthSubmission.pdf>, viewed 20 January 2010.

<sup>3</sup> Anderson et al., *supra*, endnote 8.