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Ontario Society of Physical Activity
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Ministry of the Attorney General
Agency and Tribunal Relations Branch
720 Bay Street, 3rd Floor
Toronto, ON M7A 2S9

RE: Reg. 719, Liquor License Act - Proposed Extension of Hours of Alcohol Sale and Service in Licensed Establishments, Beyond the Security Zone, in Certain Airports in Ontario

The Ontario Public Health Association (OPHA) appreciates the opportunity to comment on the proposal to extend the hours of alcohol sale and service in licensed establishments, beyond the security zone, in certain airports in Ontario. Upon careful review of the evidence, the OPHA advises that the government maintain the current permissible times of 9:00 a.m. to 2:00 a.m.

Should the government move forward with the proposed changes, the following should be considered to help reduce the harms associated with increased access to alcohol:

- Ensure that establishments and airports are adequately insured, based on an assessment of liability in authorizing alcohol service for the new times
- Ensure that airport security personnel, gate and in-air flight staff have the capacity to monitor and enforce any potential alcohol related issues at all hours
- Limit the availability of some types of alcohol during early hours; e.g. no sale of high alcohol beers (ABV of 5.6% or higher) or liquor shots between the hours of 2:00 - 9:00 a.m.
- Promote and increase awareness of Canada's Low-Risk Alcohol Drinking Guidelines, including engaging the licensed establishment to increase public awareness and understanding of responsible consumption, ideally in partnership with public health and other stakeholders
- Invest in the Alcohol and Gaming Commission of Ontario's capacity to monitor, enforce, conduct investigations and respond to complaints
- Collect data to assess the potential impact of this alcohol sales reform

Background

Research shows that extended hours of alcohol service are associated with increased alcohol consumption, increased alcohol-related harms^{1,1,1,1-15} and that increased availability contributes to the normalization of alcohol use. Passengers currently have the opportunity to consume alcohol in airport lounges and to continue drinking onboard aircrafts, leaving the potential for passengers to consume too much by the time the flight has departed. Extending the hours of service in airports provides additional opportunity for overconsumption.

In the United Kingdom, airline employees reported that alcohol was a contributing factor in 45% of all incidents of air rage among those reported to the government between 1999-2003¹⁶⁻¹⁸. In Canada and the United States, again alcohol was also the most common factor in reports of passenger misconduct¹⁹⁻²⁰. Intoxicated passengers can affect the safety of passengers and staff on board flights. Consuming alcohol has the potential to impair one's ability to evacuate an airplane safely in the event of an emergency, and intoxicated passengers may be less likely to wear a seatbelt. In cases where airplanes need to be diverted, there can be financial implications for airlines while negatively affecting the travel plans of passengers. Although airline crew are trained to handle intoxicated passengers and have policies to prevent any intoxicated passenger from boarding an aircraft, there are documented incidences where these policies do not always work and may leave staff with difficulties determining which passengers are permitted to fly. Due to these challenges, there have been talks of creating an industry standard to limit the number of drinks per passenger along with ways to enforce the policy²¹. Maintaining current alcohol service hours will prevent additional pressures on airports and airline staff.

Additional opportunities for alcohol consumption in airports followed by subsequent alcohol consumption on airplanes may pose risk to not only the passengers themselves but also the public. Alcohol consumption impairs quality of sleep²⁴, resulting in fatigued passengers arriving at their destination. Many passengers drive to their final destination after landing either by personal or rental vehicles which presents opportunities for collisions due to impaired or drowsy driving. In addition, evidence indicates a higher risk of ambulance calls for trauma in areas with highest density of on premise licensed alcohol establishments²² with alcohol-related violence most likely occurring between 22:00 and 2:00 hours²³. It has been suggested that EMS calls for injury and intoxication may be reduced by limiting the hours of operation of licensed alcohol establishments²². Maintaining current times for alcohol sales and service may prevent putting additional pressure on first responders as well as the healthcare system.

Sincerely,

OPHA's Alcohol Workgroup

More about the Ontario Public Health Association

OPHA has established a strong record of success as the voice of Public Health in Ontario. We are a member-based, not-for-profit association that has been advancing the public health agenda since 1949. OPHA provides leadership on issues affecting the public's health and strengthens the impact of those who are active in public and community health throughout Ontario. OPHA does this through a variety of means including advocacy, capacity building, research and knowledge exchange. Our membership represents many disciplines from across multiple sectors.

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