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Health Promotion Ontario

Ontario Association of Public
Health Dentistry

*Charitable Registration
Number 11924 8771 RR0001*

May 27, 2015

Dear Sir or Madam,

RE: VQA Wines at Farmers' Markets

The recent introduction of a pilot program allowing the sale of VQA wines in farmers' markets may have economic benefits but there is more at stake that needs to be considered. We wanted to alert you to the potential harms and share with you the attached information for municipalities and farmers' markets on strategies to minimize the risks associated with this pilot program.

Both the Ontario Public Health Association and the Alcohol Management in Municipalities (AMM) Working Group, a collaborative of several public health units, share a desire to promote local foods and to support local farmers and businesses. At the same time, we have concerns regarding the negative health impacts of making alcohol more readily available.

While alcohol production, sale and service in Ontario appear to have financial and social benefits, alcohol is no ordinary commodity. Alcohol consumption is a causal factor in at least 60 types of diseases and injuries and a contributing factor in 200 others. The negative consequences of alcohol misuse impact not only drinkers but those around them. At least one out of three Ontarians report experiencing disruption or harm due to drinking by others. Currently in Ontario, total alcohol-related costs due to healthcare and enforcement costs actually exceed provincial alcohol revenues.

From a public health standpoint, we are concerned about the potential repercussions of greater access to alcohol and the further normalization of alcohol consumption. The pilot project allows municipalities to opt out of the program, however we recognize that municipalities and farmers' markets will have competing priorities when making this decision. That is why we have written to municipalities and farmers' markets asking them to consider implementing harm reduction strategies (attached) that can help reduce the likelihood of liability and second-hand effects of alcohol; protect children and youth; and ensure continued success and enjoyment of the outdoor market experience.

Like your farmers' market, we envision Ontario communities as vibrant, prosperous, healthy and safe places for individuals and families. Working together to find a balance between these competing demands will ensure that we can all live in healthy communities.

Thank you for considering our request. Please feel free to contact us or [visit our website](#) for more information on [alcohol availability](#), [alcohol advertising](#), [alcohol pricing](#) and its impact on health.

Sincerely,



Pegeen Walsh
Executive Director
Ontario Public Health Association

Sale of VQA Wines at Farmers Markets: Strategies for Reducing the Potential Harms

1. Limit Alcohol Availability

Rationale:

Research has repeatedly demonstrated that as alcohol becomes more available in a community, levels of drinking and alcohol-related harms increase. Evidence shows that controls on hours, days and locations of sale can effectively limit and prevent these impacts.

Actions you can take:

- Make hours of operation of any VQA stalls no less restrictive than those in place for the on-site retail premises of vintners, where sales currently are not allowed to begin until 9:00 am. Place conditions on the timing at which sales and/or sampling occur to reflect the specific nature of the market and its surrounding community.
- Limit the number or proportion of booths dedicated to VQA wine sales to ensure the focus of the market is not on alcohol. Furthermore, municipal staff should be given the discretion to decide which farmers' markets on municipal property might be appropriate (or inappropriate) for participation in the VQA pilot. In addition, staff may set a limit on the numbers (or proportion) of stalls allowed to provide alcohol samples.
- The legislation stipulates that wineries must store their products in the location covered by their license. They are not allowed to warehouse products on site at (or nearby) the market. The Alcohol and Gaming Commission of Ontario should be notified if lack of compliance is indicated. This may require the deployment of municipal staff for compliance checking if the market is on municipal property.

2. Ensure the Responsible Sale and Promotion of Alcohol to Protect Children and Youth and to Encourage Moderate Drinking

Rationale:

Exposure to advertising shapes youths' attitudes to alcohol, influences the age an adolescent starts drinking, and leads to heavier drinking amongst those who already drink. Additionally, maintaining a certain level of pricing is one of the most effective means to reduce alcohol consumption in the general population and minimize alcohol-related harm.

Actions you can take:

- Consider the demographics and nature of the various farmers' markets. Where there is a high attendance of youth and young children, consider opting out of selling alcohol at these venues.

- Where VQA wine vendors are included at a farmers' market, alcohol sale and sampling should be confined to a designated area.
- VQA wine sales at farmers' markets should conform to existing rules around alcohol marketing and advertising.ⁱ

3. Foster Safety and Reduce Liability

Rationale:

Depending on the location, organizing groups and/or municipalities can be held liable should there be an alcohol-related incident arising from the sale and/or sampling of alcohol. The insurance provider may require additional risk-reduction measures. Keeping VQA wine sales and sampling separate from other goods may facilitate the regulation and control of alcohol. Information and/or signs posted about low-risk drinking allow consumers to make informed decisions about alcohol.

Actions you can take:

- Tastings at farmers' markets, if permitted, should be required to comply with appropriate sampling guidelines. Consider additional measures including: ensuring food is available and sample portion sizes are minimal (i.e., less than 60 ml/2 oz. for wine); limiting the number of samples per customer; not allowing customers to take samples outside the designated area for sampling at the stall; charging a nominal fee for samples on a cost recovery basis; posting/providing information on the low-risk alcohol drinking guidelinesⁱⁱ and the risks of alcohol during pregnancy.ⁱⁱⁱ Organizers of farmers' markets may want to consider establishing sampling guidelines as has been done by the Toronto Farmers' Market Network.^{iv}
- As a matter of course, licensed wineries must ensure that the workers hold an approved server training certificate (e.g. Smart Serve). Market organizers could make it a requirement that the winery provide proof that staff is Smart Serve trained.
- Farmers' markets on municipal property should ensure that they comply with any municipal alcohol policies that may already be in place.
- Participating wineries could be required to include messaging (e.g., through posters) regarding drinking and driving and preventing alcohol consumption during pregnancy.

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 and transfer. Our membership represents many disciplines from across multiple sectors.

More about the Alcohol Management in Municipalities Working Group

The Alcohol Management in Municipalities working group is a public health collaborative consisting of a number of health units from across Ontario. Our objective is to work with community stakeholders to engage and support municipalities in developing and strengthening interventions to reduce alcohol-related harm at the local level.

ⁱ Alcohol and Gaming Commission of Ontario (2011). Liquor advertising guidelines: liquor sales licensees and manufacturers.
http://www.agco.on.ca/pdfs/en/guides/3099_a.pdf

ⁱⁱ For more information on the guidelines, visit: <http://www.ccsa.ca/Resource%20Library/2012-Canada-Low-Risk-Alcohol-Drinking-Guidelines-Brochure-en.pdf>

ⁱⁱⁱ See http://www.agco.on.ca/pdfs/en/warnsign_clr.pdf.

^{iv} As posted on the City of Toronto website for the July 2, 2014 Executive Committee meeting—Attachment 3. See <http://app.toronto.ca/tmmis/viewAgendaItemHistory.do?item=2014.EX43.12>.