

March 11, 2024

Board of Directors
Alberni-Clayoquot Regional District
3008 Fifth Ave.
Port Alberni BC V9Y 2E3
Email: administration@acrd.bc.ca

Dear Alberni-Clayoquot Regional District Board of Directors:

Re: Liquor License Expansion for Sproat Lake Landing

As Medical Health Officer for the region I recognize Alberni-Clayoquot Regional District as a significant partner in protecting and promoting the public's health and wellness. It is in this shared interest of public health and safety that I strongly recommend to not support the recent proposal before the Board of Directors to expand the liquor licensing at Sproat Lake Landing.

"THAT the Board of Directors support the application for a structural change to the Sproat Lake Landing Liquor Primary License to expand the licensing to two outdoor areas with a maximum site capacity of 386 persons and to resolve that the ACRD opts out of conducting a public input process."

Alcohol consumption in B.C. has risen over the past decade with further increases over the course of the Covid-19 pandemic. Consumption rates are directly related to resulting harms. In 2022 the BC average consumption of alcohol for those 15 years and older was 9.16 litres of absolute alcohol which is equivalent to 537 standard drinks. This is in contrast to the average consumption of alcohol of those 15 years and older within the ACRD for 2022 of 14.86 litres of absolute alcohol or 872 standard drinks.

Alcohol causes more health harms than any other substance in B.C., surpassing tobacco and opioids, and is responsible for more hospitalizations, emergency room visits, and paramedic services than any other substance. Alcohol is a leading cause of preventable deaths. In 2019 the rate of deaths related to alcohol consumption was one and half times higher in the ACRD compared to BC (50.1 deaths per 100,000 vs 33.6 deaths per 100,000)¹. This trend represents a significant burden to governments and society; alcohol related issues cost the B.C. public \$2.8 billion annually². Even moderate amounts of alcohol can have serious health and social consequences including 7 types of cancers, heart disease, liver disease and violence³.

Expanding the liquor license to 386 persons at Sproat Lake Landing has public health considerations and consequences that impact individuals and the surrounding community:

1. Contribution to the over-normalization of alcohol, including among children and youth.
 - Promoting alcohol as a habitual part of socialization and social connection
 - Potential to enable underage drinking


2. Consequences from intoxication, including injury and death from drownings, violence, and impaired driving.
 - Increasing risk for disruptive behaviour, violence, hazardous litter (e.g. broken glass), and vandalism
 - Increasing risk of drowning: According to BC Coroners Service, alcohol and/or drugs play a role in 38% of drowning fatalities⁴. For recreational boating among younger people, in their thirties, over one-half involve elevated Blood Alcohol Concentration (BAC) levels⁵.

Should this proposal to expand the maximum site capacity be supported by the Board of Directors I would recommend a process for public input. Additionally, if not already underway the development of a Municipal Alcohol Policy would be a beneficial local resource for managing drinking within the ACRD and guiding local government decision making.

In closing, I urge the Board of Directors to not support this proposal.

Thank you for your careful consideration of the health and social impacts of any liquor license expansion.

Yours in health,



Charmaine Enns, MD, MHSc, FRCPC
Medical Health Officer

CE/js

¹ Canadian Institute for Substance Use Research, University of Victoria

² Canadian Substance Use Costs and Harms Scientific Working Group. [Canadian substance use costs and harms 2007–2020](#). (Prepared by the Canadian Institute for Substance Use Research and the Canadian Centre on Substance Use and Addiction.) Ottawa, Ont.: Canadian Centre on Substance Use and Addiction; 2023.

³ Paradis C, Butt P, Shield K, Poole N, Wells S, Naimi T, Sherk A, the Low-Risk Alcohol Drinking Guidelines Scientific Expert Panels. [Canada's Guidance on Alcohol and Health: Final Report](#). Ottawa, Ont.: Canadian Centre on Substance Use and Addiction; 2023.

⁴ BC Coroners Service (July 14, 2023). Accidental Drowning Deaths, 2012 – 2022. Victoria: Ministry of Public Safety and Solicitor General. Page 1. Available at: [Statistical Reports on Deaths in British Columbia - Province of British Columbia \(gov.bc.ca\)](#)

⁵ Drowning Prevention Research Centre (2021). Recreational Boating-Related Fatalities in Canada, 2008-2-17. Toronto: DRPC. Page 14. Available at: <https://www.lifesaving.ca/cmsUploads/lifesaving/File/Recreational%20Boating%20Fatalities.pdf>