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May 27, 2022

Licence Appeal Tribunal
15 Grosvenor Street, Ground Floor
Toronto, ON M7A 2G6

RE: LAT File 13345/LLA 7-Eleven Canada Inc; 622 Upper Wellington Street, Hamilton

To whom it may concern,

On behalf of the Board of Trustees at Hamilton-Wentworth District School Board (HWDSB), I wish to oppose the appeal by 7-Eleven to sell alcohol at its convenience stores at 622 Upper Wellington Street in Hamilton (LAT File 13345/LLA 7-Eleven Canada Inc; 622 Upper Wellington Street, Hamilton).

HWDSB strongly objects to the sale of alcohol at neighbourhood convenience stores. We support our civic partner, the City of Hamilton, which has officially objected to this application ([approved direction here](#)) and will be challenging 7-Eleven at the upcoming LAT hearing on June 16 and 17, 2022.

We are concerned by the proximity of this 7-Eleven site to Queensdale Elementary School (62 Queensdale Avenue, 850 meters away) and St. Peter & Paul Elementary School (49 Fennel Avenue East, 800 meters away). Students from both schools visit this site during school breaks, lunches and after school hours.

As captured in research and Canada's Chief Public Health Officer's Report on alcohol consumption in Canada (Taylor, 2015; NIAAA, May 2021), alcohol has widespread effects on risky behaviour that can lead to serious, negative consequences including violence, substance abuse, crime, accidents and even death.

Public Health data also clearly indicates that our youth are at particular risk of health and social harms related to alcohol consumption, and that preventative measures should be taken to reduce underage drinking (City of Hamilton Public Health Services, Mental Health and Harm Reduction Program Team, 2017). The NIAAA (May, 2021) highlights the importance of policy-level interventions that make alcohol more difficult to access to reduce underage drinking and the associated short and long-term risks.

We respectfully submit that the sale of alcohol in community convenience stores is a highly problematic policy direction, with documented risks:

1. It will increase availability of alcohol in the community and youth exposure to alcohol, which will lead to increased risk of underage drinking in impacted neighbourhoods along with the

associated health risks for our youth (City of Hamilton Public Health Services, Mental Health and Harm Reduction Program Team, 2017).

2. Increased retail accessibility of alcohol in convenience stores has additional risks relating to limited staff and lower levels of staff training that result in increased likelihood of selling alcohol to inebriated customers.
3. Based on data from extensive analysis in Perth, Australia, retail on-site alcohol access leads to increased risk of alcohol-associated motor accidents in the community (Hobday, 2017).

Alcohol already results in many challenges in our communities, and our youth are particularly at risk with increased rates of underage alcohol consumption. Our Hamilton community is also facing a road safety crisis that has claimed the lives of too many pedestrians. We do not want intoxication at a local corner store to add to the tragedies we have already witnessed in Hamilton.

We strongly oppose the application and recommend denial of the appeal. If the appeal is granted, against the policy strategies recommended to mitigate risks related to alcohol use, we ask for specific restrictive conditions on this operation, including:

- Restrict the sale of alcohol during school and after school hours until at least 5 p.m.
- Permit the sale of only beer, wine and coolers, not hard alcohol.
- Limit in-store alcohol consumption to two servings per person in one visit.
- Clearly designate a serving/consumption zone, with staff and video monitoring both inside and outside to monitor serving, patron behaviour and potential drinking and driving offences.
- Restrict underage patrons in the serving/consumption zone.
- Exterior signs informing the public of alcohol sale, and a contact for public complaints.
- Increased staffing requirements during alcohol sale hours.

HWDSB serves about 50,000 children and youth each day, and we care deeply about our communities.

Thank you for considering our views and for sharing our desire to keep students safe.

Sincerely,



Dawn Danko
Chair, Hamilton-Wentworth District School Board

CC:
Alcohol and Gaming Commission of Ontario
City of Hamilton

HWDSB

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References:

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Hobday, M. (2017). *The effect of alcohol availability on road crashes at varying distances from the Central Business District in Perth, Australia from 2005-2015*. Curtin-Monash Accident Research Centre. Retrieved from <https://www.wa.gov.au/system/files/2021-08/The-effect-of-alcohol-availability-on-road-crashes-at-varying-distances-from-the-CBD-in-Perth%2C-Australian-from-2005-to-2015-%282016%29.pdf>

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Taylor, G. (2016). *The Chief Public Health Officer's Report on the state of public health in Canada, 2015: Alcohol Consumption in Canada*. Public Health Agency of Canada. Retrieved from <https://www.canada.ca/en/public-health/services/publications/chief-public-health-officer-reports-state-public-health-canada/2015-alcohol-consumption-canada.html#a5>