

ENGAGEMENT PAPER

Liquor to Go

Purpose

The Liquor and Cannabis Regulation Branch, Ministry of Public Safety and Solicitor General invites interested parties to comment on the sale of liquor for off-site consumption with the purchase of a meal (known as "Liquor to Go"). This engagement paper provides a brief background and questionnaire to guide responses.

Contact Janet Donald Executive Director, Liquor and Cannabis Regulation Branch Janet.Donald@gov.bc.ca

Introduction

In 2020, the Liquor Control and Licensing Regulation (LCLR) was temporarily changed to allow Food Primary (FP) and Liquor Primary (LP) licensees to sell "Liquor to Go" with meals. The change was meant to help the hospitality industry during COVID-19 restrictions on in-house dining. FP (e.g., restaurants) and LP (e.g., bars, pubs, and nightclubs) licensees were limited to selling liquor for off-site consumption with the purchase of a meal for takeout or delivery to mitigate risks with overconsumption and competition for retail sales with liquor stores.

In 2021, Liquor to Go was made permanent to support the industry's long-term financial recovery from the pandemic.

The LCRB is now exploring changes to the Liquor to Go policy to ensure it continues to support the hospitality industry while balancing public health and safety.

For example, instead of authorizing Liquor to Go for all FPs and LPs, the LCRB is considering adding discretion for the General Manager, who oversees licensing. Discretion would help determine who should be eligible to sell liquor for takeout/delivery and what criteria should be applied in making the decision. This would allow Liquor to Go sales to continue and add requirements that support public health and safety.

We're looking for your feedback on the benefits and challenges of the Liquor to Go policy such as known public health and safety risks from the program, and additional requirements that may address the challenges and risks.

Who will the LCRB be engaging with?

Through this engagement, the LCRB wants to hear from:

- BC Alliance of Beverage Licensees (ABLE BC)
- BC Restaurant and Foodservices Association
- Restaurants Canada
- Business and Technical Advisory Panel (BTAP)
- FP and LP licensees (and their consultants)
- Indigenous Partners (all First Nations Rights and Title Holders, Modern Treaty Nations, and Métis community members through Métis Nation BC)
- Local governments (through the Union of BC Municipalities (UBCM) Liquor Policy Working Group)
- Ministry of Health

• Health Authorities

Background

Since the policy was implemented, the LCRB has observed ongoing challenges with compliance – particularly with the requirement that Liquor to Go be sold only in conjunction with a meal. There are also emerging concerns that FPs and LPs may be shifting to a retail-style model, emphasizing liquor sales for off-site consumption rather than their core focus on in-house food and beverage service.

This raises policy concerns, as there has been a moratorium on new liquor retail store licences since the 1990s to maintain a competitive but sustainable industry, while managing alcohol availability in the province. Evidence shows that increased access to alcohol is associated with higher levels of consumption and, in turn, greater alcohol-related harm and social costs.

Current Liquor to Go requirements

Authorization Process

There is no special licence or endorsement that authorizes Liquor to Go. All FP and LP licensees are eligible to sell Liquor to Go if they meet the requirements in the LCLR.

Requirements

- For both FPs and LPs, the sale of liquor must occur with the sale of a meal for off-site consumption.^{1, 2}
- In addition, FPs are authorized to sell Liquor to Go when the primary purpose of the business is the service of food.³ This is also a requirement for the FP licence class overall.
- Further requirements are outlined in the <u>FP Licence Terms and Conditions</u> <u>Handbook</u> (pages 20-22) and the <u>LP Licence Terms and Conditions</u> <u>Handbook</u> (pages 22-24), including packaging of single-serving drinks, hours

¹ LCLR section 9.1(2)

² LCLR section 16.1(2)

³ LCLR section 16.1(3)

of sale for takeout or delivery, and minimum prices. These additional requirements are the same for FP and LP licensees.

What liquor products can be sold?

When selling Liquor to Go, both FP and LP licensees may sell the following:

- Unopened beer, wine, cider, coolers, refreshment beverages, spirits and liqueurs (liquor packaged in the container that the manufacturer sold the product in); and
- Single-serving drinks containing liquor that are packaged by the licensee (including a glass of wine, cider, draft beer, mixed drinks, or an unmixed ounce of a spirit).

Questions

Comments focused on the questions outlined below are appreciated. Comments outside the scope of this paper may not be considered at this time.

Your comments are confidential and will not be shared in a manner that identifies you.

1. From your perspective, are there public health and safety impacts of the Liquor to Go policy and/or implementation?

2. Liquor to Go sales are currently regulated by rules on product types, singleserve packaging, hours of sale for takeout or delivery, and minimum pricing.

Which of the following changes do you think the LCRB should consider? (*Select all that apply*.)

□ Introduce volume limits (e.g., set a maximum volume of liquor that can be sold with a meal)

□ Introduce price limits based on a ratio between the liquor price and the meal price (e.g., the price of liquor cannot exceed three times the price of the meal)

□ Update the types of products that can be sold for Liquor to Go (e.g., single-serving drinks but not packaged products, or beer/wine but not spirits)

 \Box Other (specify below)

If you wish, you may provide more information about your selected answer(s):

3. Currently, all FP and LP licensees can sell Liquor to Go according to the policy (e.g., sell the liquor with a meal for off-site consumption). The LCRB is considering changes to the eligibility requirements.

What FPs and LPs should be eligible for Liquor to Go? (Select one.)

□ All FPs and LPs

□ Only FPs

□ Only LPs

 \Box I want to choose the types of establishments that are eligible

If you selected "I want to choose the types of establishments that are eligible," please select from the list below. (*Select all that apply*.)

□ Restaurants

- □ Cafés
- 🗆 Bistros
- 🗆 Pubs
- 🗆 Bars
- □ Lounges
- □ Nightclubs
- □ Members only clubs and legions
- □ Hotels
- □ Golf courses
- □ Stadiums
- □ Concert halls/live theatres
- □ Movie theatres
- □ Recreational facilities (e.g., curling, bowling alley and other types)
- □ Outdoor event venues

□ Other type of business where the primary focus is not beverage service (e.g., spas, art galleries, cooking schools)

□ Trains or motor vessels

□ Airports

□ Other (*please specify*):

How to participate

Please submit comments in writing to <u>LCRB.Outreach@gov.bc.ca</u> by **August 7**, **2025.**

When submitting your comments, please include:

- Full name of the person submitting
- Name of the business/organization and licence number, if applicable
- Nation, municipality or regional district
- Phone number, including area code and reply email address

If you wish to provide comments by mail, you can send them to: PO Box 9292 Stn Prov Govt Victoria, BC V8W 9|8

Collection Notice

By submitting a response to this engagement paper, I understand that my personal information is being collected pursuant to sections 26(c) and 26(e) of the *Freedom of Information and Protection of Privacy Act* for the purposes of sharing my views or the views of my organization in response to the questions outlined in the engagement paper for use in considering changes to Liquor to Go. Any questions about the collection, use, disclosure and storage of my Personal Information pursuant to this engagement should be directed to the Executive Director, Liquor and Cannabis Regulation Branch at PO Box 9292 STN PROV GOVT, Victoria, B.C., V8W 9J8, or by phone at 778-698-5050.

Thank you for taking the time to share your input and engage with the LCRB on this important topic.