



AGCO

Alcohol and Gaming
Commission of Ontario

Licence Line

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DAVID C. HAYSIE

From the Chair...

We begin the New Year with a major story on risk-based licensing which is now in effect across Ontario. This new compliance-focused process, originally launched in eleven municipalities in July 2008, will become effective province-wide on March 1, 2010. It applies to all liquor sales licence applications. Risk-based licensing is a move toward regulation based on compliance rather than focusing only on enforcement. It is intended to help licensees operate their establishments in a safe and responsible manner within Ontario's liquor licensing regime. Other elements of our compliance strategy include risk-based enforcement and monetary penalties.

More educational programs

Another major initiative undertaken by the AGCO in furtherance of our compliance strategy has been the development, over the past several months, of a wide range of new and updated educational/information materials together with a liquor sales licensee education and training program. Following a successful pilot project in the Ottawa area last summer, AGCO staff will conduct similar training sessions this year in various centres across the province. A series of new and updated educational materials will also be released (see story beginning on this page). This is part of the Commission's expanded public affairs program aimed at establishing a closer working relationship with our licensees and other stakeholders.

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Risk-based licensing extended across Ontario

From new licence applications, to transfers and changes, to liquor sales licence renewals, the AGCO has been rolling out the staged introduction of risk-based licensing since July 2008. With the completion of Phase One, which saw this new process apply only to licensees in eleven municipalities, risk-based licensing will be used by the AGCO to process all types of liquor licence applications right across the province beginning March 1, 2010. For those licensees not in Phase One communities, they will likely first encounter risk-based licensing during their next renewal period.

The idea behind risk-based licensing is fairly straightforward:

- There are some establishments which pose a greater risk to public safety, the public interest and/or non-compliance with the law because of their type of business, location, past history or experience.

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Risk-based licensing helps licensees stay compliant, focuses AGCO resources

Licensee, staff education program – to roll out across the province this spring

Following the successful launch in Ottawa last summer of an educational pilot project for liquor licensees and their staff, the AGCO will expand this free program province-wide beginning in spring 2010. Further details on where and when will be provided in the next edition of Licence Line. This information will also be posted on the AGCO website as it becomes available.

Continued on p. 8 See *Get in the Know*

Alcohol and Gaming Commission of Ontario
90 Sheppard Avenue East, Suite 200
Toronto, Ontario
M2N 0A4



Submitting a temporary extension application

The arrival of warmer weather in spring and summer brings an influx of temporary extension applications to the AGCO.

Temporary extensions are customarily requested by licensees to hold special events or to participate in a community festival. A temporary extension may be granted for a specific event but will not be granted to an applicant who is waiting for the issuance of a permanent liquor sales licence.

The Registrar of Alcohol and Gaming may approve a temporary physical extension (indoors or outdoors) of the premises to which a licence to sell liquor applies, for a period of fourteen days or less, if the extension is adjacent to the premises to which the licence applies. A licensee is eligible to receive a maximum of four extensions per calendar year.

To ensure an applications are processed as quickly as possible, please follow the checklist included with the required application, which can be found on our website at www.agco.on.ca/pdf/forms/3098B.e.pdf

Some helpful tips:

- One notification letter outlining the details of an event can be submitted to the AGCO indicating local building, fire, health and police departments have been notified accordingly (individual letters to these departments are not required).
- Applications must be signed by the licensee or a manager who has signing authority. The application cannot be signed by a transfer applicant. Only one signature is required from a director or officer of a corporation.
- Applications for temporary extensions to be held outdoors require a letter of non-objection from the local municipal clerk. While applications will be accepted without this letter, the temporary extension will not be issued until a non-objection letter from the municipal clerk is received.

For further information, refer to the AGCO web page noted above or call AGCO Customer Service at 1 800.522.2876 or 416.326.8700.

Movie theatres, bingo halls now eligible for liquor sales licences

Following the evaluation of a pilot project providing for the sale, service and consumption of alcohol in bingo halls and age-restricted movie theatres, the Ontario government has approved an amendment to Regulation 719 under the *Liquor Licence Act* (LLA) which permits these types of businesses to apply for a liquor sales licence on an ongoing basis.

Movie theatres

Previously, movie theatres could only hold a liquor sales licence for a lounge or concourse area. Patrons could not take their drinks with them into the theatre itself. Under the amendment, movie theatres may permit patrons who are 19 years of age or older to take their drinks into the theatre if:

- the theatre has a valid liquor sales licence,
- the areas where alcohol is served, including auditoriums, are physically separated and clearly distinguished from non-licensed areas, and
- if admission to the licensed auditorium is restricted to those 19 years of age or older.

Currently, Alberta is the only other province that has similar regulations in place.

Bingo halls

Bingo hall owners operating under the bingo revenue model may apply for a liquor sales licence which will allow them to serve alcohol to patrons in areas where bingo is being played.

As with any liquor sales licence, movie theatres and bingo halls are required to sell and serve alcohol in compliance with the LLA and Regulations, and staff and management must receive **Smart Serve** certification.

Continued from p.1 *Chair's column*

Other important news

We also include in this Edition a number of other articles which we trust will be useful to those interested in the beverage alcohol business. These items cover the application process for a temporary licence expansion, licensing for bingo halls and movie theatres, and important news about our ongoing commitment to improve and expand the AGCO website. It is our intention to make this internet site more easily usable, and a helpful instrument for liquor and gaming information and news.

Ministerial change

I would like to welcome our new Minister for Consumer Services, the **Honourable Sophia Aggelonitis**, MPP for Hamilton Mountain. We at the commission look forward to working closely with her in making sure Ontario's liquor and gaming laws are kept modern and effective.

David C. Gavrie
Chair

Board profiles

This continues the series of short profiles on members of the Board of the AGCO. These members are appointed to the Board of the AGCO by the Ontario government. They can be appointed as full-time or part time members. The Board has a quasi-judicial function. It holds hearings and conducts appeals when necessary on certain matters that arise relating to liquor and gaming legislation, regulation and registration. There are currently fourteen members of the Board, including the Chair.



Jacqueline R. Castel began her career in gaming with the Ontario government, where she was involved in designing, setting up and ultimately administering the regulatory framework governing casinos. Ms. Castel has served as General Counsel/Corporate Secretary of Casino Niagara and as Vice President, Legal and Administration, for Casino Rama. At both Casino Niagara and Casino Rama, she designed, administered and oversaw effective programs for complying with all gaming, currency reporting and privacy legislation. She has assisted the governments of Ontario, Nova Scotia and New Brunswick in drafting their casino gaming legislation. Ms. Castel has published a text, Gaming Control Law in

Ontario, which she updates annually. She has written, published and spoken extensively on topics of regulatory compliance, gaming law, and currency reporting legislation and is regarded as an expert in these areas. Ms. Castel holds an Honours B.A. in international relations (1988) from the University of Toronto and a re (1991) from the University of Toronto Faculty of Law.



Brian J. Ford is the former Chief of Police of the Regional Municipality of Ottawa-Carleton and the City of Ottawa. He holds a Masters Degree in Public Administration from Queen’s University, a Bachelor of Arts Degree from Carleton University, and is a graduate of the Federal Bureau of Investigation (USA) National Executive Institute. Mr. Ford is a Member of the Order of St. John’s, holds the Canadian Police Exemplary Service Medal and Bar, and Canada’s 125 Medal. He was the President of the Criminal Intelligence Service of Ontario and Chair of the Law Amendments Committee of the Canadian Association of Chiefs of Police. Mr. Ford is heavily involved in his community and is now serving as the past President of The Youth Services Bureau of Ottawa. ■

■

New minister appointed



Premier Dalton McGuinty has appointed **Sophia Aggelonitis**, MPP (Hamilton Mountain) as **Minister of Consumer Services**. Ms. Aggelonitis was Parliamentary Assistant to the Minister of Economic Development and Trade (Small Business). Following her election to the Ontario Legislature in 2007, she became Parliamentary Assistant to the Minister of Small Business and Consumer Services. Prior to holding elected office, Ms. Aggelonitis was a small business owner and a member of the Hamilton Chamber of Commerce where she served a term as president. Ms. Aggelonitis was a member of the Hamilton AM Rotary Club, and a board member of the Bob Kemp Hospice, Theatre Aquarius, Canadian Club of Hamilton and Phoenix Place.

The Alcohol and Gaming Commission of Ontario (AGCO) reports to the Minister of Consumer Services. ■

Moving a licensed establishment to a new municipal location

- Q. What is the procedure/policy for moving a liquor licensed establishment and liquor inventory from one location in a municipality to another address?**
- A.** Under the *Liquor Licence Act*, a liquor licence is approved for a specific location. Therefore, a new liquor licence application would have to be made for the new location—and the liquor licence for the existing or old location would have to be surrendered. A current liquor licence cannot legally be automatically transferred from one address or municipal location to another. A new liquor licence number is required.
- Q. Can liquor inventory from the old address be automatically transferred to a location with a new liquor licence?**
- A.** No. Approval for such a transfer must be acquired from the Liquor Control Board of Ontario (LCBO). The licensee must be able to indicate to the LCBO (through invoices for liquor purchased) that all of the liquor in the inventory has been purchased legally from the LCBO, the Beer Store or a licensed winery. Usually, this can be done via a paper transfer approved by the LCBO. Unopened liquor that isn’t supported by an invoice may be returned to the LCBO for credit. ■

Top-to-bottom redesigned AGCO website to be launched this spring



The AGCO will soon be launching its new website that will make liquor and gaming information much easier to find and use. With input from users across the province, the new site will feature improved navigation and graphics, a “Top Ten Topics” section, enhanced search functions, more information and accessibility features.

A key addition to the site is a “Services for you” section, where individualized “shortcuts” for key stakeholder groups, including liquor sales licensees, ferment-on-premise licensees, liquor delivery services and manufacturers, will assist in quickly and easily accessing information. ■

Decision Summary

The following establishments were recently brought before the Board of the AGCO for disciplinary action. The list represents only those licensees that received suspensions of 14 days or more and revocations for the period beginning **November 11, 2009** ending **January 31, 2010**. Sanctions for similar infractions may vary in length according to the specifics of each case. Details about all Board decisions are now available on **QUICKLAW**.

ESTABLISHMENT	INFRACTION	SANCTION
Albert’s Hotel, Timmins	Permitted narcotics on premises	34 days ¹
Ci Vediamo Ristorante, Toronto	Obstructing an inspection; failure to facilitate inspection	30 days ²
Express Delivery (LDS), Sudbury	Serving minors; failure to inspect identification; past conduct; licensee did not comply with order form requirements; licensee did not deliver the liquor to a person at the residential address listed in the purchase order; licensee did not obtain a proper receipt at the time of delivery; licensee completed delivery of liquor without obtaining a signed receipt; contracted out the delivery of liquor	Revoked
Fluid Lounge and Restaurant, Toronto	Permitted narcotics on premises	28 days
Hooley’s Restaurant, Ottawa	Liquor sold to person who appears to be intoxicated; permitted drunkenness	14 days
Shoeless Joe’s Stouffville, Stouffville	Not financially responsible in conducting its business due to <i>Retail Sales Tax Act</i>	Revoked
Spearmint Rhino Gentlemen’s Club, Etobicoke	Permitted drunkenness	17 days

The following is a list of sanctions where the licensee did not request a hearing and received suspensions of 14 days or more and revocations for the period beginning **November 11, 2009** ending **January 31, 2010**. Any omissions will be reflected in our next edition. Sanctions for similar infractions may vary in length according to the specifics of each case.

Brando’s On Market, Brantford	Permitted drunkenness, quarrelsome, violent and disorderly conduct; licensee failed to ensure reasonable measures taken to deter disorderly conduct, or minimize the harm caused from it, in the vicinity of the licensed establishment; overcrowding; service outside prescribed hours—did not contest	14 days
Chopin Restaurant, Toronto	Permitted drunkenness; failure to clear signs of service; obstructing an inspection; failure to facilitate inspection—did not contest	22 days
Habesha Lounge, Toronto	Permitted drunkenness and disorderly conduct; permitted narcotics on premises; licensee failed to ensure reasonable measures taken to deter disorderly conduct, or minimize the harm caused from it, in the vicinity of the licensed establishment; obstructing an inspection; failure to facilitate inspection; service outside prescribed hours; failure to clear signs of service—did not contest	45 days
Kelly’s Welcome Irish Pub and Restaurant, Manotick	Permitted drunkenness; overcrowding; permitted removal of liquor from premises; liquor not purchased under licence—did not contest	18 days

¹ Decision released October 2, 2009 ordering a further 10 day suspension – from January 6 to January 16, 2010 – to the 24 days already served under an interim suspension from March 6 to March 30, 2009.

² Four suspension days served from October 27-31, 2009 the remaining 26 suspension days were served from January 2 to January 28, 2010.

Decision Summary continued from page 5

ESTABLISHMENT	INFRACTION	SANCTION
Legendz Eatery & Niteclub, Kingston	Serving minors; failure to inspect identification; permitted drunkenness—did not contest	14 days
Parkers Pier Ltd., Port Colborne	Permitted drunkenness; permitted narcotics on premises; liquor sold to person who appears to be intoxicated—did not contest	14 days
Roxy Tap & Grill, Wallaceburg	Permitted drunkenness; permitted removal of liquor from premises—did not contest	20 days
Second Beer Bar and Restaurant, Toronto	Illegal liquor; liquor not purchased under licence; failure to clear signs of service; permitted unlawful gambling; failure to post sign in a conspicuous place concerning suspension—did not contest	30 days
Wine Depot, London	The licensee failed to ensure that the customer combined or mixed beer wort, wine juice, wine juice concentrate or other juice or juice concentrate with the customer’s other ingredients; provided services contrary to the regulations; failed to ensure customer labeled and packed his/her own beer or wine; failed to ensure customer removed product; produced on the licensed premises liquor for sale or exchange; kept for sale or exchange, offered for sale or exchange, sold or exchanged beer or wine on the licensed premises; gave liquor to person on licensed premises; stored or permitted the storage on the licensed premises of beer or wine that has been placed in containers; failed to provide and prepare an invoice setting out the required information; failed to ensure that each carboy being used for making beer or wine had attached to it the required tag; beer or wine consumed on premise contrary to regulation—did not contest	40 days

ATTENTION ALL LICENSEES—We want to hear from you!

Licence Line is a publication intended to provide practical and timely information to liquor licensees and interested parties in Ontario’s beverage alcohol industry relating to licensing, regulation and enforcement under the **Liquor Licence Act** and its Regulations.

The publication is free of charge and mailed to liquor licensees and others, generally on a quarterly schedule.

To ensure Licence Line continues to print helpful and useful material, the Editor is requesting licensees and other

interested parties to send along ideas for stories you feel would be beneficial in explaining the liquor laws of Ontario, and that may help you to better operate your licensed establishment.

Please address all correspondence to:
The Editor, Licence Line
Alcohol and Gaming Commission of Ontario
90 Sheppard Avenue East, Suite 200
Toronto, Ontario M2N OA4
or by e-mail to: editor@agco.on.ca

AGCO website has lots of information

If you are looking for general information on beverage alcohol, how to apply for a liquor sales licence or other liquor licensing matters, please visit our website at www.agco.on.ca. You can download and fill out on screen, liquor-related forms such as liquor licence applications, renewals, transfers, etc.



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Welcome to Alcohol and Gaming Commission of Ontario web site

AGCO

Continued from p.1 **Risk-based licensing**

- Through risk-based licensing, the AGCO can strategically focus more of their resources on these establishments, while at the same time moving toward regulation based on compliance by licensees rather than enforcement.

From a licensee’s perspective, the introduction of risk-based licensing has very little impact on the application process. The only element that will be unfamiliar is the addition of a one page Establishment Description form, which is required to accompany each application type. This form provides the AGCO with additional information about the establishment, such as the type of business and hours of operation, in order to better understand the nature of the licensee’s business.

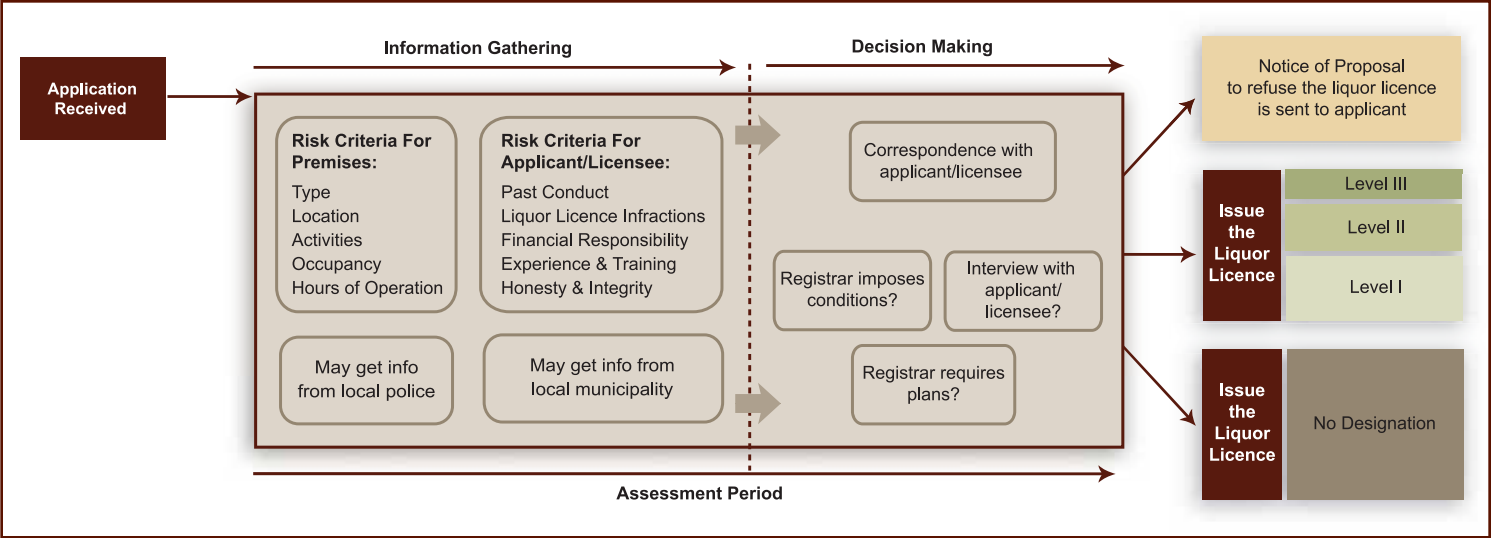
For the vast majority of liquor sales licensees who operate in accordance with the *Liquor Licence Act* and Regulations, these operators will see no change in the way their licences are administered.

Overall, risk-based licensing is intended to be helpful to liquor licensees as it assists them in operating their establishments in a safe and responsible way, and in compliance with the *Liquor Licence Act* and its Regulations.

criteria to assess the risk(s) posed to public safety and public interest, and of non-compliance with the law.

Licensees/ applicants are evaluated under the criteria of *past conduct, liquor-related infractions, honesty and integrity, financial responsibility, and training and experience*. The premises themselves are evaluated under the criteria of type, location, occupancy, activities and hours of operation.

2. After reviewing all the available information on both the licensee/ applicant and the establishment, the Registrar assesses the risks and determines if the licence should have a Level I, Level II or Level III risk designation, or no designation.
- The majority of establishments (approximately 75% of all licences in Ontario) will not receive a designation and will see no change in the way that their licences are administered. If the Registrar believes that no conditions need to be placed on a licence, or if a licensee has taken steps on his/ her own to recognize and manage any risks, then the Registrar will most likely assess the licence as having no designation.



How does risk-based licensing work?

There are four key principles behind risk-based licensing:

1. To identify persons or places that pose specific risks to public safety;
2. To mitigate risks and ensure compliance with the *Liquor Licence Act* through the entire lifecycle of a liquor licence;
3. To find ways of reducing the administrative burden for those who pose a lower risk; and
4. To focus more AGCO resources on those establishments less likely to be in compliance with the *Liquor Licence Act* and Regulations.

The application of risk-based licensing can occur at any point in the life-cycle of a liquor licence, and is a three step process:

1. After an application is received for a new licence, transfer, change or renewal, an assessment takes place. During the initial application review, the Registrar of Alcohol and Gaming (“the Registrar”) uses AGCO Board-approved

- If the Registrar believes that there is a greater degree of risk associated with a particular establishment and the licensee/ applicant may need more assistance and support to remain compliant with the *Liquor Licence Act* (for example, by placing conditions on the licence or by increasing the frequency of AGCO inspectors visiting the establishment), then the establishment will be designated at Level I, Level II or Level III. Only about 25% of liquor licences in Ontario will receive a risk designation, and the majority of these will fall into the Level I category.

3. If the Registrar designates an establishment at Level I, Level II or Level III, certain conditions may be attached (from among those approved by the AGCO Board for this purpose) to the liquor licence to help address any identified risks.

Licensees assessed as “no designation” or at Level I may see some administrative relief by the AGCO. In contrast, a licensee receiving a Level III designation will most likely

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experience more stringent conditions placed on the licence as well as more frequent visits by AGCO inspectors.

During the lifetime of a licence, the Registrar can reassess the risk posed by the licensee and adjust the risk level either up or down depending on the individual circumstances. A review can occur either because the licensee requests a redesignation, or because the Registrar becomes aware that there has been a change in circumstances and there should be a review to determine whether or not a redesignation is appropriate. At each of these times the Registrar may add, remove or amend one or more conditions.

Conditions may be imposed, plans required

Conditions may be put on a licence by the Registrar to help manage the risks assessed by the licensee or the premises and to help the licensee stay compliant with the *Liquor Licence Act* and its Regulations. The conditions attached to a licence under risk-based licensing are not “one size fits all” but are chosen to meet the individual circumstances of each licensee and are selected from a list of conditions approved by the AGCO Board for this purpose. Some of these conditions include:

- The holder of the licence shall sell and serve liquor only in containers that are approved by the Registrar of Alcohol and Gaming.
- The holder of the licence shall sell and serve liquor only during the hours specified by the Registrar of Alcohol and Gaming.
- The holder of the licence shall not provide or permit music or other forms of entertainment in outdoor areas.
- The holder of the licence shall ensure that no person under the age of 19 years enters the premises.
- The holder of the licence shall not sell or serve and shall not permit consumption of liquor after XY o’clock on the patio or other outdoor areas.

For a full list of conditions, please visit the AGCO website at www.agco.on.ca/en/b.alcohol/b11.2.conditions.html

A licensee designated as Level I, Level II or Level III may also be required to submit a plan (Safety and Security Plan, Compliance Plan, Nuisance Mitigation Plan, Patron Control Plan or Management Control Plan) to help comply with liquor licence laws and protect public safety. The Registrar may provide standards or guidelines to assist licensees in preparing these plans. ■



Questions & Answers about risk-based licensing

Q. How and when can conditions be removed?

A. Under risk-based licensing, if a condition is placed on a licence by the Registrar, then the Registrar may remove the condition. If a risk no longer exists or the licensee can show that the establishment is or will be operated responsibly without the need for the condition, then the Registrar may consider that and remove the condition.

If a condition is placed on a licence by the AGCO Board as a result of a hearing, this condition can only be removed by the Board.

Q. What happens if I sell my business and transfer the liquor licence?

A. Under risk-based licensing, risk levels and conditions are not “inherited” when a liquor licence is transferred.

Before a licence is transferred, a new risk assessment is done on the proposed licensee and his/her proposed establishment. While some things about a premises won’t change (for example, it is still in the same neighbourhood), the new owner might change the type of business (for example, a sports bar becomes a fine dining establishment or vice versa) and that might mean different types of risk. The new owner will also have a different background than the person transferring the licence, which could lead to different risks being identified.

Q. How will risk-based licensing affect a renewal, change or new liquor licence application?

A. Under risk-based licensing, for each type of liquor licence application a risk assessment of both the applicant and the establishment will be carried out using criteria approved by the AGCO Board.

A letter will then be sent to the licensee/applicant inviting him/her to provide comments on the proposed risk level and conditions. The licensee/applicant will have a set time to provide comments, following which the Registrar will finalize the risk levels and conditions, and issue the licence.

Some applicants for new liquor licences may not be required to place an advertisement in the local newspaper inviting the public’s comments on the proposed licence. As well, the minimum notification period for new liquor licence applications has been reduced from 30 days to 7 days, although the notification period for some new applications may be required to be longer (up to 30 days).

Q. How will risk-based licensing work with the liquor enforcement regime at the AGCO?

A. One of the key goals of the AGCO is to focus both licensing and enforcement resources on those licensees and establishments that pose a greater risk to public safety and that are less likely to comply with the law. The AGCO’s Investigation and Enforcement Branch has also developed a risk-based approach to compliance, and liquor inspectors will work closely with the AGCO’s Licensing and Registration Branch to share information about the status of liquor licences. ■

Continued from p.1 *Get in the Know:* Licensee education & information

The licensee educational sessions aim to provide a forum for staff and management training, including a question-and-answer period, to help licensed establishments remain in compliance with the *Liquor Licence Act* and Regulations. The sessions are divided into two parts:

- a one hour session for anyone involved in the sale and service of liquor including owners/managers, bartending, serving, and security staff. This part provides basic knowledge of Ontario's liquor laws required in the operation and day-to-day sale and service of liquor, followed by...
- a one hour session directed at owners/managers and focused on some of the more administrative-related topics relating to maintaining a liquor licence.

Attendees also receive the AGCO's new licensee information kit, which contains "plain language" reference material including the guides *You and the Liquor Laws* and *You and the Liquor Laws Plus*, Responsible Service Tip Sheets and AGCO inspector contact information. It also gives AGCO



inspectors and licensees a quick resource and reference tool for face-to-face meetings.

Participant feedback

To help the AGCO refine and meet the needs of licensees the program, all participants who attended the Ottawa pilot sessions were invited to answer a detailed survey using anonymous electronic voting or hand-written comment cards. Licensees who received an AGCO Information Kit through their local inspectors were provided a survey sheet.

Almost 300 people attended the seven general seminars. Some 73% of attendees were owners, licence holders or managers, and 79% had been in the industry for five years or more. The responses were very favourable with 89% saying they found the information useful and 83% saying they learned something. Of the attendees, 81% said they would recommend the session to others.

Kits were distributed to 153 licensed establishments, with 90% of recipients saying they reviewed the material and shared it with staff and 84% stating they found the information useful and easy to read.

AGCO booth at CRFA/Hostex Trade Show 2010 stocked with info and answers

The AGCO invites all liquor sales licensees and others interested in beverage alcohol policy and regulations to stop by the AGCO booth (#844) at the 2010 Canadian Restaurant and Foodservice Association Hostex Show at Toronto's Direct Energy Centre from March 7 to 9, 2010.

AGCO representatives will be at the booth throughout the show to answer liquor-related questions. Licensees can pick up a wide range of free AGCO educational materials designed to assist and provide information to stay compliant with relevant liquor laws and policies, and aid in staff training. These materials include:

- "You and the Liquor Laws"—A guide for **staff** of liquor sales licensed establishments which covers information on the responsible sale and service of alcohol.

- "You and the Liquor Laws Plus"—A guide for **owners and managers** of liquor sales licensed establishments which also features lots of information on administrative requirements.
- FASD (fetal alcohol spectrum disorder) poster (*Sandy's Law*).
- "Know the Liquor Laws" mini CD featuring the complete text of the *Liquor Licence Act* and Regulations.
- "Responsible Service Tip Sheets" covering a range of topical subjects on improving compliance at licensed establishments.

The CRFA/Hostex show is Canada's leading food and beverage industry event. The trade show attracts approximately 12,000 people and almost 1,000 exhibitors. The CRFA Show offers more of the latest foods, beverages, equipment, services and technology than any other event in the country.



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Licence Line is published by the Alcohol and Gaming Commission of Ontario to provide licensees and interested parties with information regarding alcohol legislation and related issues. Reader comments are welcome. This newsletter is available free of charge to all holders of a liquor sales licence in Ontario.

Editor, Licence Line
Alcohol and Gaming Commission of Ontario
90 Sheppard Avenue East, Suite 200
Toronto, Ontario M2N 0A4
editor@agco.on.ca

General Inquiries: 416.326.8700
Toll free in Ontario: 1 800.522.2876
General E-mail: customer.service@agco.ca
Internet address: <http://www.agco.on.ca>
Disponible en français