

Sean P. Webster  
Vice President - Public Affairs



243 Consumers Road  
North York, ON M2J 4W8  
Direct Line: 416-490-2687  
e-mail: sewebster@shoppersdrugmart.ca

Members of the Economic Development Committee Toronto City Hall  
100 Queen Street West  
Toronto, Ontario

**Attention: Ms. Merle MacDonald, Committee Administrator**

October 12, 2012

Dear Councilors,

Thank you for the opportunity to provide comments to the Economic Development Committee regarding the October 4, 2012 Staff Report on Holiday Shopping in Toronto (Staff Report).

Earlier this summer several Shoppers Drug Mart Pharmacist-Owners attended the City of Toronto's Retail Holiday Shopping public consultation meetings. In addition to participating in these consultations, Shoppers Drug Mart also provided a written submission to the consultation coordinator, a written submission to City Staff, and more recently several Pharmacist-Owners have met with their local Councilors to discuss this issue.

The focus of our comments have not been on the merits of holiday shopping, but out of concern that Council recognize the value of ensuring access to pharmacy services for Torontonians throughout the year. Our recommendation is that, regardless of what the Economic Development Committee decides with respect to retail holiday shopping, the arbitrary 7500 square foot limitation on pharmacies should be removed so that patients, wherever they reside in the City, can access the services of a pharmacist when they need them. It is our view that there is no public policy benefit for arbitrarily reducing access to pharmacy services on statutory holidays.

We also wish to respectfully correct some of the data that is referenced in the report.

#### **Pharmacies that are less than or greater than 7500 square feet**

When holiday shopping was first regulated by the province almost twenty-five years ago, there was a recognition that pharmacies should be permitted to open on statutory holidays. In the original provincial legislation, a threshold of 7500 square feet was established, as the vast majority of pharmacies at that time were below this threshold.

Much has changed in the last quarter century, so too has the average footprint of many pharmacies. The Staff Report includes data from the Ryerson University Centre for the Study of Commercial Activity (CSCA) which notes that information is available for the size of 453 of the 555 pharmacies within the City of Toronto. The report notes that of those pharmacies for which data is available that 75% (approximately 340) have square footage that is less than 7,500 square feet and that **"50 pharmacies, or about 11% of all pharmacies in Toronto, are over 10,000 square feet"**. Unfortunately this data is not consistent with our own situation. Of the 135 Shoppers Drug Mart pharmacies within the City of Toronto, 88 have sales areas greater than 7500 square feet, **62 of which are greater than 10,000 square feet**, which is 12 more than indicated in the Staff Report. As Shoppers Drug Mart is not the only

pharmacy chain with locations that have sales areas greater than 10,000 square feet within the City of Toronto, one could safely surmise that the actual number is significantly larger than that referenced in the Staff Report.

### **What services do pharmacies provide?**

Pharmacies provide a great deal of support to the health care system, reducing the strain on hospitals and providing continuity of care to patients 365 days a year. Many attendees at the public consultation meetings agreed that enabling pharmacies to stay open on holidays without a restriction on size is important to ensuring that the public can continue to access this essential healthcare service.

In 2011, on statutory holidays Toronto residents required prescription services over 82,000 times. They also required a wide range of other health services including counseling on over-the-counter medications, medication management and methadone treatment.

Providing health care assistance is more than just dispensing prescriptions; it is about supporting all aspects of a patient's health. From administering flu shots, advising parents with a sick child, to providing diabetes management counselling or prescription management counselling, pharmacists provide crucial access to a variety of prescription and non-prescription services.

It is also important to consider that provincial legislation provides protections for employees with respect to working on statutory holidays under the *Employment Standards Act* (2000). Accordingly, all employees in Shoppers Drug Mart stores have the option of working on statutory holidays on an entirely voluntary basis. Our experience is that many employees choose to work on statutory holidays because of the additional benefits of extra holiday pay, and in many cases because they do not share the religious occasion being observed.

In summary, regardless of what the Economic Development Committee decides with respect to retail holiday shopping, the arbitrary 7500 square foot limitation on pharmacies should be removed from Toronto's existing bylaw so that patients, whenever and wherever they reside in the city, can access the services of a pharmacist. There is no public policy benefit for arbitrarily reducing access to pharmacy services on statutory holidays.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'S. Webster', with a long horizontal flourish extending to the right.

Sean Webster  
Vice President of Public Affairs  
Shoppers Drug Mart