

ED 18.6.33

Responsible
Community Retailing



Unit 217-466 Speers Rd., Oakville, ON L6K 3W9
(905) 845-9152 www.conveniencestores.ca

November 26, 2012

Dear City Councillor:

I am writing to you as Chief Executive Officer (CEO) of the Ontario Convenience Stores Association to express our serious concerns with Item ED 18.6 from the Economic Development Committee which proposes changes to the current Holiday Shopping restrictions on certain retail establishments and pharmacies. Specifically, recommendation #2 contained in the report before Council will exempt pharmacies up to 15,000 square feet (currently set at 7,500 square feet) from the requirement to close on statutory holidays. This change is in direct conflict with the original intent of the Retail Business Holidays Act (RBHA) and will be very detrimental to the over 2000 small family run convenience stores in Toronto which will be forced to compete with large, big-box pharmacies such as Shoppers Drug Mart on such holidays.

Currently, Toronto's Municipal Code allows pharmacies less than 7,500 square feet to remain open on statutory holidays. This is consistent with the provisions in the RBHA as it respects the need for pharmacies to be open to the public who may depend on them for prescription and non-prescription medication. However, over the years, significant channel blurring has occurred in the retail market and large big-box pharmacies more resemble a small grocery store or large convenience store. Their product offering includes many if not most of the items that convenience stores would sell and allowing them to open on statutory would only put them in direct competition with convenience stores on these days.

The convenience store industry has for many years had the right to open on statutory holidays to serve the public with last minute needed items on these days. Because of this history, these nine (9) days have become some of the biggest business days of the year for convenience stores. Allowing large big box pharmacies to open would be a very significant loss of business for our members. And, as such we are asking you to strongly reject committee recommendation #2. It is clear that it will serve no other benefit to the public other than generate more business for large big box pharmacies at the expense of small family owned convenience stores.

If you have any questions for me, or wish to arrange a meeting to discuss this further, I would invite you to call me at 905-845-9152.

Sincerely,

Dave Bryans

CEO

Ontario Convenience Stores Association (OCSA)