



February 20, 2012

The Honourable Rich Coleman
Minister of Energy and Mines and Minister Responsible for Housing
Victoria, B.C.

VIA FAX: 250 356-2965

Dear Minister Coleman:

RE: Liquor rules in relation to movie theatres

I write to you in my role as President of the B.C. Civil Liberties Association. Our organization is interested in rights and freedoms, and in particular that government restrictions of otherwise lawful activities by adults that don't harm any other parties are only implemented if such measures are reasonably justified in a free and democratic society.

We have been advised by the Rio Theatre, as well as through media by the Vancouver International Film Festival, of serious issues and inconsistencies relating to the Liquor License and Control Act's regulations regarding licenses that permit the consumption of alcohol before, during, or after film-related events.

In particular, we note that movie theatres – even where admission is restricted to those 19 years of age or older – may not serve alcoholic beverages under special occasion licenses, or at all during the screening of movies under any license. Venues with liquor primary licenses may not show films as their primary business activity.

We understand that the primary justifications for this restriction are concerns about the passing of alcohol to underage children in a movie theatre, as the environment is dark and difficult to control. Assuming this is correct without commenting on the obvious exceptions to this rule made for concert venues in Vancouver, our organization has difficulty understanding why an event at a facility with a liquor primary or special occasion license, where admission is limited to those 19 years of age or older, could not serve alcohol regardless of the entertainment offered: movie, theatre, dance, art exhibition, DJ and dancing, wrestling, hockey, television programming, opera, rock bands, etc.

The singling out of movies for this bizarre rule that seems to have no logical connection to its intended purpose appears to promote certain types of entertainment over others as government policy. One would assume, for

example, that the government would be seeking to promote cultural film screenings. Both of the theatres that have raised this issue are independent film houses that show Canadian and independent movies or host international film festivals. When compared to the absence of restrictions placed on liquor primary venues one block away from the Vancouver International Film Festival, where special policing measures have been put into place given the nature of the entertainment options with alcohol offered on Granville Street, the restriction appears even more bizarre.

We congratulate you on your first steps towards reforming these rules, but we urge your government to prioritize modernizing the Liquor Control and Licensing Act and its regulations so that British Columbians may enjoy the drink of their choice with the entertainment of their choice at liquor primary or special occasion venues, without government interference.

Yours truly,

A handwritten signature in black ink, appearing to read "R. Holmes", with a long, sweeping flourish extending to the right.

Robert Holmes, Q.C.

President