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Alliance for Healthier Communities

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Office of Legislative and Regulatory Modernization
Policy, Planning and International Affairs Directorate
Health Products and Food Branch, Health Canada
11 Holland Avenue, Ottawa, Ontario, K1A 0K9

RE: Proposed restrictions to flavoured purified alcohol

The Ontario Public Health Association (OPHA) appreciates the opportunity to comment on Health Canada's proposed regulations to restrict the amount of alcohol in single-serve "flavored purified alcohol" beverages. OPHA commends Health Canada for engaging key stakeholders to consult on this issue given the potential negative health impacts of these products.

In this submission, we outline the importance of protecting our youth from alcohol-related harms. We also offer recommendations on the proposed regulations of flavored purified alcohol beverages to ensure a comprehensive and evidence-informed approach to promoting health and safety of youth.

Protecting Canadian Youth

Flavored purified alcoholic beverages have been implicated in multiple cases of hospitalization and in one death within the last year. Reflecting on these cases, which have prompted the development of regulations regarding these products, we would like to reiterate why our youth are especially vulnerable to alcohol-related harms.

According to the [Canadian Centre on Substance Use and Addictions \(CCSA\)](#), most young people do not drink in moderation on a regular basis, but rather alternate between periods of abstinence and binge drinking, in addition to exhibiting other risky consumption patterns. Highly sweetened beverages are particularly appealing to youth as the sugar masks the taste of alcohol, enticing youth to drink more and thus increasing their risk of overconsumption. Youth who lack experience with alcohol use are at greater risk for alcohol-related harms.

In addition, youth who regularly consume alcohol above the low-risk drinking guidelines increase their risk of developing chronic illness, including cancer. Consuming alcohol above the low-risk guidelines can also negatively impact youths' developing brains. The adolescent brain continues to develop into early adulthood

and youth who consume alcohol are doing so at a time when strategy and planning skills are still developing. Alcohol use can have harmful effects on the health and safety of adolescent youth.

With respect to alcohol-related behaviors, research presented in [Public Health Ontario's report on alcohol marketing](#) suggests that alcohol marketing normalizes and influences youth and young adults' perceptions around alcohol consumption. A [2017 PAHO report on alcohol marketing](#) found that the more advertisements youth are exposed to, the more likely they are to start drinking earlier and to drink more excessively. As a result, it is imperative to also consider marketing of this new class of alcohol beverages, particularly with respect to a younger demographic.

Recommendations

OPHA acknowledges the proposed regulations as a solid foundation for limiting overconsumption of alcohol and thereby minimizing alcohol-related harms among youth. OPHA urges your government to build upon the current regulations to develop a comprehensive, evidence-informed approach to protecting youth from the potential dangers of flavored purified alcohol beverages.

OPHA recommends that the regulations regarding flavored purified alcohol beverages be expanded beyond the alcohol limit to include measures such as:

1. Standard alcohol labelling for this new class of beverages including standard drink labelling, health warning labelling and nutrition labelling;
2. Volumetric excise taxes across all beverage types and strengths at a level that will effectively deter overconsumption; and
3. Alignment with Canada's Food Guide recommendations around sweetness and artificial flavors.

For more details and rationale behind each of the above recommendations, please refer to **Appendix A**.

Conclusion

As youth are particularly susceptible to alcohol-related harms, the regulation of highly sweetened alcoholic beverages such as flavored purified alcoholic beverages can have significant implications on their health and safety. Comprehensive regulation of such alcohol products could support a national alcohol strategy committed to protecting Canadians from a range of health and social alcohol-related harms. OPHA welcomes the opportunity for further consultation with Health Canada regarding the regulation of flavored purified alcohol beverages. Please feel free to contact Cathy Edwards (Cathy.Edwards@kflaph.ca), Co-chair of OPHA's Alcohol Workgroup, with any questions.

Thank you for your consideration.

Sincerely,



Karen Ellis-Scharfenberg
President, OPHA

Appendix A

Based on the proposed regulations and existing evidence of alcohol consumption in youth, OPHA proposes the following recommendations for the regulation of flavored purified alcohol beverages.

1. OPHA urges your government to consider standard alcohol labelling for this new class of beverages, including standard drink labelling, health warning labelling and nutrition labelling.

Standard Drink Labelling

- The proposed regulations mandate a maximum of 1.5 standard drinks per container of single-serve flavored purified alcoholic beverages, however, without accompanying standard alcohol labelling Canadians may be more susceptible to overconsumption.
- Given our knowledge of common youth consumption patterns, and the appeal of these particular beverages to youth, we encourage conveying information around the number of drinks per container to consumers.
- [PHO's report on standard alcohol labels](#) outlines experimental research conducted in Australia in the early 1990's which found that, compared to labels showing alcohol by volume (ABV), Standard Drinking Labels (SDLs) significantly improved the ability of drinkers to correctly identify the number of standard drinks in a given container. The research also showed that SDLs labels improved the ability of drinkers to correctly pour a standard drink in glasses of various sizes and with alcohol of varying strength.
- This research was replicated in Canada in 2014 where drinkers were asked to identify the number of standard drinks of various alcohol types in various container sizes using either ABV labels or SDLs. In the majority of cases, drinkers performed significantly better with the SDLs than with the ABV labels.
- 82.7% of drinkers in this Canadian study reported that they would support the introduction of SDLs in Canada.
- In countries such as Australia and New Zealand, SDLs are required on alcoholic beverages.

Health Warning Labelling

- The use of standard product labels to convey health-related information on food and beverages is now widespread in Canada, except in the case of alcoholic beverages. This is despite the fact that approximately 80% of the population reports drinking alcohol at least once in the past year, and that there is clear evidence linking drinking with significant harm and cost.
- In Canada, alcohol health warning labels are only mandated in the Yukon and Northwest Territories and apply only to mixed and non-standardized drinks.

Nutrition Labelling

- Nutrition information labels convey nutrition and other health-related information (e.g., calories) an evidence consistently shows a strong correlation between nutrition label use and healthier diet choices.
- According to the [WHO report on alcohol labelling](#) there is agreement in the literature that nutrition labelling may improve knowledge, raise awareness and initiate discussion regarding the harmful health consequences of alcohol.

2. OPHA maintains that your government implement volumetric excise taxes across all beverage types and strengths at a level that will effectively deter overconsumption.

- In an earlier collaborative [consultation](#) between OPHA, the Centre for Addiction and Mental Health (CAMH), University of Victoria and the Canadian Cancer Society, it was recommended that Health Canada implement volumetric excise taxes across all beverages types and strengths at a level that would effectively deter overconsumption.
- The price of alcohol directly influences the level of its consumption. Correspondingly, increases in alcohol prices are associated with reductions in alcohol-related harms at a population level. Studies continue to demonstrate that increasing alcohol prices and taxes lead to significant decreases in alcohol-related deaths, violence, and crime.
- Currently, only spirit-based products greater than 7% ABV are subject to a volumetric [excise tax](#); for all other products types and strengths, a flat tax per liter of beverage is applied. This creates price incentives for consumption of higher alcohol content beverages.
- Excise tax is one of the most effective and efficient strategies for influencing the final price of alcohol as it is the first tax to be added to the wholesale price of alcohol, and markups and retail sales taxes (e.g., GST, HST and PST) multiply its effects. For these reasons, the World Health Organization recommends increased prices through measures such as excise taxation as part of its [Global Strategy to Reduce Harmful Use of Alcohol](#).

3. OPHA recommends that your government consider aligning recommendations around sweetness and artificial flavors for this class of beverages with Canada's Food Guide recommendations.

- Given that these beverages have been defined as a distinct class and that a sweetness threshold is not currently being explored further, we recommend that Health Canada considers aligning its regulations with best practices from sources such as [Canada's Food Guide](#).
- The newly released Food Guide warns of the dangers of alcohol and encourages limiting the intake of sugar-sweetened beverages. The new guide states that alcoholic beverages can contribute to increased calories in the diet with little to no nutritive value. When alcohol is mixed with syrups, sugary drinks such as soft drinks and fruit-flavored drinks, or cream-based liquors, they can be a significant source of sodium, free sugars, or saturated fat. Artificial flavors also appeal to youth, and therefore, should also be limited in this new class of beverages.
- [Guideline #2](#) of Canada's Dietary Guidelines outlines the potential harms and risks associated with consuming sugar-sweetened beverages.

About OPHA

Created in 1949, the Ontario Public Health Association (OPHA) is a non-partisan, non-profit organization that brings together a broad spectrum of groups and individuals concerned about people's health. OPHA's members come from various backgrounds and sectors - from the various disciplines in public health, health care, academic, non-profit to the private sector. They are united by OPHA's mission of providing leadership on issues affecting the public's health and strengthening the impact of people, who are active in public and community health throughout Ontario. This mission is achieved through professional development, information and analysis on issues effecting community and public health, access to multidisciplinary networks, advocacy on health public policy and the provision of expertise and consultation.

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