Dietitians of Canada agrees with Health Canada’s concern that there is need to regulate flavoured purified alcoholic beverages. “The beverages are often high in alcohol, sold in large single-serve containers, and formulated, packaged, and marketed in a manner that can appeal to a younger, more impressionable segment of the drinking population”.

The current recommendation in Canada Gazette 1 to which we direct our comments is: “Flavoured purified alcoholic beverages would be limited to a maximum of 1.5 standard drinks if they are sold in a container of a volume of 1000 mL or less. An exception to this limit will be made for those beverages sold in glass containers of a volume of 750 mL or more as these are understood to be multi-serve.”

The following are key points from Dietitians of Canada, recommended for change and improvement of the proposed regulations for flavoured purified alcoholic beverages:

1. Our primary concern is about the proposed maximum of 1.5 standard drinks allowed per container. **We strongly recommend that these single serving containers contain a maximum of 1.0 standard drink per container.** This is an amount that consumers will assume is present in a single serving container and it is common that people will consider consuming at least 2 containers in one special occasion.

This concern (about 1.5 standard drinks per container being too high) was clearly stated by several experts in Health Canada’s consultation with health stakeholders conducted before the release of Canada Gazette 1. There is NO articulated rationale from Health Canada to support the decision to ignore this collective advice of experts in mental health and alcohol consumption patterns of vulnerable populations. As well, the Report on Highly Sweetened Pre-Mixed Alcoholic Beverages of the Standing Committee on Health makes this point in Recommendation 1: “That

---


Health Canada restrict the alcohol content in highly sweetened pre-mixed alcoholic beverages to that of one standard serving of alcohol in Canada, or 13.5 grams or 17.05 millilitres pure of alcohol through the *Food and Drug Regulations*.

Additional rationale for our recommendation concerns females as the primary target audience for these drinks. At 1.5 standard drinks per container, consumption of only 2 cans would provide 3 standard drinks, which is the maximum in a special occasion and in excess of the maximum for usual consumption — “maximum 2.0 drinks most days”, as defined in Canada’s Low-Risk Alcohol Drinking Guidelines³. Furthermore, these drinks are also marketed as attractive to a younger consumer population — at 1.5 standard drinks in a container, consumption of 2 containers would automatically exceed the limit of “never more than 1–2 drinks at a time” for teens. As well, at 1.5 standard drinks per container, it would be very easy to exceed the low-risk guidance of “Have no more than 2 drinks in any 3 hours.” [Canada’s new Food Guide and Dietary Guidelines⁴ also contain warnings about alcohol: “There are health risks associated with alcohol consumption. Alcoholic beverages can contribute a lot of calories to the diet with little to no nutritive value. When alcohol is mixed with syrups, sugary drinks such as soft drinks and fruit-flavoured drinks, or cream-based liquors, they can be a significant source of sodium, free sugars, or saturated fat” and further discusses the economic and social costs of alcohol-related harm in Canada.]

The following are examples of the marketing for these drinks, provided as examples, demonstrating that these drinks are primarily marketed to female consumers, usually with representation of young adult females:

- [https://www.cosmopolitan.com/food-cocktails/g1681/fun-and-girlie-drinks/](https://www.cosmopolitan.com/food-cocktails/g1681/fun-and-girlie-drinks/)
- [https://qz.com/486704/this-is-how-men-and-women-drink-according-to-twitter/](https://qz.com/486704/this-is-how-men-and-women-drink-according-to-twitter/)

2. Furthermore, we recommend the specification of both the minimum and maximum sizes of single serving containers of these drinks, within a range of 250-600 mL per container, each containing not more than 1.0 standard drinks.

The volume of a container will impact the choice of volume to be consumed. If the amount of alcohol is standardized per container, it follows that a container of small volume (i.e., a shot, a “mini”) could contain a very high concentration of alcohol (more than a “strong drink”) and several containers could easily be consumed within an occasion of over a few hours. This would also limit the alcohol concentration within a range similar to or lower than many other cooler-type beverages available, e.g., 6.7% alc/vol in 250 mL to 3.0% alc/vol in 568 mL. For containers at/beyond the size of 600 mL, the current proposal, allowing up to 1.5 drinks per container is reasonable, since

---


the larger volume suggests more than one serving per container and the alcohol concentration would be limited (e.g., up to 3.6% alc/vol if sold in a 710 mL container).

3. Regulation of the marketing format should be included, such that packaging of these drinks in a “4 pack” of single serving containers is not allowed.

Such packaging suggests an appropriate number of containers for one occasion of drink consumption (e.g., a party evening). We recommend that these single serving containers should only be sold as separate containers. Such a restriction would be in keeping with the Recommendations of the Report of the Standing Committee on Health⁵, in which they articulated several recommendations regarding Labelling and Packaging, Marketing and Branding – which we understand are global recommendations outside the scope of this regulation amendment.

Additional Recommendations – Outside the Scope of this Consultation:

We note the many recommendations in the Report of the Standing Committee on Health⁶, detailing “Restrictions on the Alcohol, Sugar and Caffeine Content in Highly Sweetened Pre-Mixed Alcoholic Beverages”. There is urgent need for the federal government to ensure that Canadian consumers have the information they need to make responsible choices when consuming alcohol. A mandatory Nutrition Facts table on the label of all containers of alcoholic beverages, including the # g alcohol in a serving, would provide such information, so that consumers would be able to see and compare the composition and total calories in the various alcoholic beverages they consume.

Consumers need information about the composition of beverages they consume. Many consumers do not understand the high caloric levels, primarily from sugars and alcohol, in the drinks they consume. Indeed, this is also an important consideration raised in the recently launched new Canada’s Food Guide⁷, which refers to the health risks associated with alcohol consumption: “Alcoholic beverages can contribute a lot of calories to the diet with little to no nutritive value. ... they can be a significant source of sodium, free sugars, or saturated fat.... If alcohol is consumed, Canada’s Low-Risk Alcohol Drinking Guidelines can be used ... guidelines set a limit, not a target. If all Canadian drinkers were consuming alcohol within the Guidelines, alcohol-related deaths could be reduced.”

---

⁶ Ibid. https://www.ourcommons.ca/Committees/en/HESA/StudyActivity?studyActivityId=10058427
Canada’s Low-Risk Alcohol Drinking Guidelines

Provided as reference (with bolded text to highlight points raised above):

Your limits: Reduce your long-term health risks by drinking no more than:

- 10 drinks a week for women, with no more than 2 drinks a day most days
- 15 drinks a week for men, with no more than 3 drinks a day most days
- Plan non-drinking days every week to avoid developing a habit.

Special occasions: Reduce your risk of injury and harm by drinking no more than 3 drinks (for women) or 4 drinks (for men) on any single occasion. Plan to drink in a safe environment. Stay within the weekly limits outlined above in Your limits.

Delay your drinking: Alcohol can harm the way the body and brain develop. Teens should speak with their parents about drinking. If they choose to drink, they should do so under parental guidance; never more than 1–2 drinks at a time, and never more than 1–2 times per week. They should plan ahead, follow local alcohol laws and consider the Safer drinking tips listed in this brochure. Youth in their late teens to age 24 years should never exceed the daily and weekly limits outlined in Your limits.

Safer drinking tips: Set limits for yourself and stick to them. Drink slowly. Have no more than 2 drinks in any 3 hours. For every drink of alcohol, have one non-alcoholic drink.

Additional references:

Canadian Centre on Substance Abuse
Current, accurate information on drugs and drugs trends in Canada

Health Canada: National Anti-Drug Strategy
Interactive web site with current information on substances and trends

National Institute on Drugs Abuse for Teens (NIDA for Teens)
Scientific facts about how drugs affect the brain and body
Rethink your drinking - http://www.rethinkyourdrinking.ca/

For further information:

Pat Vanderkooy, MSc, RD
Manager, Public Affairs
Dietitians of Canada
Tel: 226-203-7725
pat.vanderkooy@dietitians.ca
www.dietitians.ca