

To: Health Canada

Re: Consultation on Sweetened Alcohol Beverages

Thank-you for the opportunity to provide input into changes in the Food and Drug Regulations to restrict the amount of alcohol in single-serve highly sweetened alcoholic beverages.

Families for Addiction Recovery (FAR) supports Health Canada's intention to restrict the amount of alcohol in a single-serve (non-resealable) container.

We have all kinds of laws to protect youth because their pre-frontal cortexes are not fully developed until their mid-twenties. Teenagers are known to be more impulsive and to take more risks than adults. Further, impulsivity and risk-taking are two personality traits that are common in persons who develop substance use disorder.

Youth may not read any warning label on these products and they are likely to assume, as would many adults, that a single-serve container contains one standard drink. For this reason, we recommend that the maximum percentage of alcohol allowed in single serve containers not exceed one standard drink.

If youth incorrectly assume that a single serve container contains a single serving, they are more likely to drive impaired, making this not only a safety issue for those youth but for the general public. In 2010 youth aged 16-25 represented 13.6% of the population, but they represented 33.4% of alcohol related traffic deaths. It is better to err on the side of safety.

The evidence provided by the Institut National de Sante Publique du Quebec in [Acute Alcohol Poisoning and Sweetened Alcoholic Beverages](#) is shocking and heartbreaking. The recommendations in that publication demand immediate action.

FAR, representing families whose children have struggled with addiction from early adolescence, would appreciate the opportunity to be involved in future consultations not only on the issue of sweetened alcoholic beverages, but with respect to the regulation of addictive substances in general.

In particular, we are interested in a public health approach to the regulation of all psychoactive substances instead of the commercialization (lax regulation) of alcohol and the criminalization (lack of regulation) of other substances which have the effect of maximizing harms in each case at the expense of people and families affected by addiction.

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