

## Submission to Health Canada

### Proposed Amendments to Restrict the Amount of Alcohol in Single-serve Containers of Flavoured Purified Alcohol

Thank-you for this opportunity to provide feedback on the proposed amendments to the Food and Drug Regulations (FDR) to restrict the amount of alcohol in single-serve containers of flavoured purified alcohol.

In the words of Health Canada (HC):

“Flavoured purified alcoholic beverages are formulated, packaged, and marketed in a manner that can appeal to a younger segment of the drinking population. The taste of alcohol is masked and the added sweet and fruity flavours make these alcoholic beverages taste comparable to soft drinks.

The combination of the affordability, sweet taste, high alcohol, and single-serve format can facilitate unintentional overconsumption. **One container could be perceived as one drink** while containing up to 4 standard drinks of alcohol\*. These products have been implicated in hospitalizations and one death within the past year.”

The stated intention is to help protect Canadians, particularly youth, from unintentional overconsumption.

Families for Addiction Recovery (FAR) agrees with HC that most adults, and particularly youth, will believe that one container contains one standard drink. For this reason, FAR’s position continues to be that single serve containers should contain a maximum of 1 standard drink, not 1.5 as proposed by HC.

HC has provided three rationales for providing a maximum of 1.5 instead of 1 standard drinks per single-serve container:

- 1. Manufacturers can still make products with less than 1.5 standard drinks per single-serve container.**

HC is regulating these beverages because the industry, left to their own accord, were willing to have a single serve container contain up to 4 standard drinks. It is clear that the industry will manufacture products at the upper limit. That the possibility exists that some may voluntarily make products that contain less than 1.5 standard drinks is irrelevant.

- 2. There are currently many single-serve products (eg. beers, ciders and coolers) on the market that contain up to 1.5 standard drinks per container.**

HC is regulating flavoured purified alcohol because these products are different than beers, ciders and coolers. They are potentially much more dangerous because they have been deliberately altered to be stripped of the flavor and smell of alcohol which would make someone aware, particularly alcohol naïve youth, that they are consuming alcohol. Beers, ciders and coolers still generally taste like alcohol, not like soft drinks or Kool-Aid. Further, just because people may currently be making the mistake of believing that beers, ciders and coolers contain one standard drink is not a good reason to continue this deception to flavoured purified alcohol.

**3. A person could consume one drink and still be under the Lower Risk Drinking Guidelines (LRDG).**

How does this address HC's concern about unintended overconsumption? If HC wants to avoid unintended overconsumption and truly believes that people will perceive that one single serve container contains one standard drink, then the only way to do that is to have one single serve container contain one standard drink. Why is a deception of "just 50%" okay?

Surely the point is that adults, let alone youth, are currently being deceived in to believing they are consuming less than they are? If a woman is trying to follow the LRDG so she has 2 of these drinks a day, she is actually consuming 3 drinks a day, an unintended overconsumption of one drink, or 50%, per day. Over a year that's 365 extra drinks.

Further, the "Safer Drinking Tips" in the LRDG suggest drinking slowly and having no more than 2 drinks in 3 hours. Under the proposed amendments to the FDR this would mean 1 drink every three hours because 2 drinks will equal 3 drinks.

To summarize, when does  $1 = 1.5$ ? Only when HC is protecting our youth from the alcohol industry.

Angie Hamilton  
Executive Director  
[Families for Addiction Recovery](#)