



March 17, 2017

Toronto Board of Health  
10th floor, West Tower, City Hall  
100 Queen Street West  
Toronto, ON M5H 2N2  
Sent by email: [boh@toronto.ca](mailto:boh@toronto.ca)

Re: HL18.1 Municipal Alcohol Policy Update on Alcohol and Caffeinated Energy Drinks, and  
HL18.2 Caffeinated Energy Drinks: Feasibility of Restricting Sales and Marketing to Youth in Toronto

Dear Board members,

Dietitians of Canada (DC) applauds your consideration of items HL18.1 and HL18.2 regarding restriction of energy drink sales and urges you to adopt the recommendations of the Acting Medical Officer of Health. As a pan-Canadian health professional organization, representing almost 6000 members, DC advances health through food and nutrition, providing evidence-based food and nutrition information, supporting easier access to adequate, safe and healthy food and promoting professional best practices.

Since 2011, DC has responded with concern to Health Canada public consultations regarding the proposed approach to managing caffeinated energy drinks (CEDs) in the marketplace, following previous submissions to Health Canada on related topics of discretionary fortification of foods with vitamins and minerals, caffeinated non-cola drinks, and natural health products, as well as our [position paper on Nutrition and Athletic Performance](#). In our [publicly available reports](#), DC has stated that we do not support consumption of CEDs, given the potential for unwanted health effects from excessive intakes of caffeine, sugar and other ingredients in these products. In our view, there is no public health rationale to support the availability of CEDs in Canada. DC supported the 2010 recommendations of the Expert Panel. We note that the maximum amount of 180 mg caffeine per single-serve container exceeds the maximum daily caffeine limit for all children and adolescents weighing less than 72kg (158 lbs). Acknowledging that sales of CEDs are targeted to teenagers and young adults, DC has recommended that the cautionary

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statement, “Not recommended for...”, explicitly name *teenagers* (in addition to “children”) to mitigate potential risks associated with the overconsumption of these beverages, believing that such a statement would not, in our opinion, be understood by members of the public, parents or teens, to include individuals of adolescent age. DC also supported the labelling requirement for the statement “Do not mix with alcohol” on CED containers.

The recommendations under consideration by the Toronto Board of Health are, in our opinion, proactive for health protection, as an adjunct to current weaknesses in labelling and education about potential harm related to CED consumption, especially for teens. We are fully supportive of the contents and conclusion of the excellent evidence review presented in Attachment 2: [Caffeinated Energy Drinks Technical Report on Public Health Concerns and Regulation in Canada](#), prepared by Toronto Public Health (February 16, 2017). The precautionary recommendations before the Board are an important way for local government “to increase awareness of Health Canada’s caution statement not to mix energy drinks with alcohol among event organizers and workers” and “not selling caffeinated energy drinks to individuals under the age of majority”.

Dietitians of Canada commends you, the Board of Health, in your consideration of using municipal strategies to take action for reduction of risk and harm, by reducing the impact of sales and marketing strategies of CEDs in the City of Toronto. We urge you to adopt the recommendations before you, for the protection of vulnerable citizens in your City and potentially, as an example which other cities in Canada will also adopt.

Sincerely,



Pat Vanderkooy, MSc, RD  
Manager, Public Affairs

cc. Marsha Sharp, CEO, Dietitians of Canada  
Jennifer Buccino, Regional Executive Director - Northwest and Central Ontario, Dietitians of Canada  
Glenn De Baeremaeker, City Councillor, Toronto  
Jann Houston, Director, Strategic Support, Toronto Public Health  
Loren Vanderlinden, Manager of Healthy Living Team, Toronto Public Health