



Thursday, March 28, 2024

Economic and Community Development Committee
Toronto City Hall
100 Queen Street West
Toronto, ON M5H 2N2

Sent via email: ecdc@toronto.ca

Re: Item EC11.4, Economic and Community Development Committee - Meeting 11

Dear Councillors and City staff:

I am contacting you on behalf of the association for Canada's non-alcoholic beverage sector, the Canadian Beverage Association (CBA). This is in regard to the consideration of the Evaluation Findings for the Parks Pilot from 2023 (Item EC11.4) at the Economic and Community Development Committee Meeting on Thursday, March 28, 2024.

The CBA has a long history of collaboration with legislative and regulatory authorities to ensure the lawful marketing and safe consumption of our non-alcoholic beverage products of our members. We are committed to supporting the leadership of non-alcoholic beverage producers in driving Canada's beverage container circular economy and meeting regulatory obligations through proactive stakeholder education and policy development.

We know that Torontonians have enjoy local parks and consumed non-alcoholic beverages without a direct guidance or recommendation for decades, and we believe this should this continue. There should be no changes or recommendations related to consumption of no-alcoholic beverages in Toronto parks.

During the parks pilot program, there was specific signage that provided oversight on the rules and recommendations associated with consuming an alcohol beverage. With that said, the signage did include a statement to "Avoid mixing alcohol with other drugs or energy drinks." We believe that the consumption of non-alcoholic beverage should not be captured as it was not pertinent to the consumption of alcohol.

Further, we would like to share a reminder that on July 20, 2022, Health Canada published its Supplemented Food regulation (which energy drinks fall under). This provided an updated regulatory framework for energy drinks in Canada. This is the latest data that we would refer you to when developing policy related to potential recommendations.

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We would ask that City staff reference this information when and if making recommendations on the consumption of energy drinks. Specifically, Health Canada states that: "Health Canada acknowledges that there is currently limited evidence supporting a direct risk to health resulting from the co-consumption of CEDs and alcohol. As well, there is limited evidence that CED consumption causes risky behaviours or masks signs of alcohol-induced inebriation that could promote risky behaviour."¹

The CBA wanted to ensure City staff were made aware of Health Canada regulations for Supplemented Foods ahead of updating the policy related to park pilot program and consider this as part of a request to remove commentary on beverages that have been safely consumed in parks for decades.

Should you have any questions we are happy to set up a meeting to discuss this further or provide additional background information on these recent changes.

Sincerely



Ryan Singh
Director, Policy and Government Affairs
Canadian Beverage Association

¹ [Canada Gazette, Part II, Volume 156, Number 15](#)