



Ontario Society of Nutrition
Professionals in Public Health

La société ontarienne des professionnel(le)s
de la nutrition en santé publique

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To Whom It May Concern:

On behalf of the Ontario Society of Nutrition Professionals in Public Health (OSNPPH), we are writing to the Food Directorate to express our concerns about the introduction of caffeine and caffeine citrate in non-cola carbonate beverages (i.e. carbonated soft drinks) and to urge labelling regulations, should this change in current caffeine formulation regulations occur.

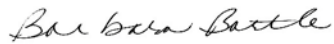
Currently Canadian adults consume the majority of their caffeine in coffee (60%), tea (30%), and carbonated beverages, chocolate products and medicines (10%). Canadian children consume their caffeine from cola drinks (55%), tea (30%), chocolate (14%) and the rest from sources such as medications. Caffeine is a stimulant and excessive intakes can lead to insomnia, headaches, irritability, dehydration and nervousness. For some, the effects of consuming caffeine can be more severe. Research has shown that too much caffeine for pregnant and breastfeeding women can harm the baby. Pregnant women who consume too much caffeine are at a higher risk of miscarriage and can give birth to babies with a lower birth rate. Children are also more sensitive to the effects of caffeine due to their smaller size. It is already all too easy to exceed recommended maximum intakes of caffeine given that caffeine, in its natural and added forms, can be found in many types of products.

Furthermore, we are also concerned that there is no regulatory provision for mandatory quantitative labelling of caffeine, such as a well defined statement identifying the specific amount of milligrams of caffeine per stated serving size (i.e. caffeine content: XX mg per stated serving size). Additionally, there is no requirement to identify the quantitative amount of caffeine in composite food containing ingredients that are natural sources of caffeine. Strong action such as change to labelling regulations to identify and quantify caffeine on food labels is necessary to help Canadians make informed decisions about their caffeine consumption and facilitate their ability to make the healthy choice the easiest and most logical one.

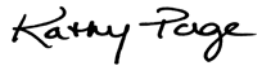
Including caffeine in all carbonated beverages (cola as well as non-cola varieties) creates the opportunity for Canadians, especially children, to increase their consumption of this stimulant that provides no nutritional value and could be harmful. OSNPPH urges tighter regulatory action prohibiting the introduction of caffeine to all non-cola carbonated beverages, and enhanced caffeine labelling to mandatory identification and quantification of caffeine in foods and beverages containing this substance.

Thank you for considering these recommendations.

Sincerely,

A handwritten signature in cursive script that reads "Barb Bartle".

Barb Bartle, RD
Co-Chair

A handwritten signature in cursive script that reads "Kathy Page".

Kathy Page, RD
Co-Chair