

# **Product Recalls for Saskatchewan (SK)** **Craft Alcohol Producers**

Effective September 1, 2020

# Policy

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- It is the responsibility of all Saskatchewan (SK) Craft Alcohol Producers to initiate recalls on products they have manufactured. A product recall is initiated when the product is determined to have one or more of the following:
  - A safety issue (Examples: contamination; alcohol by volume outside of acceptable tolerance);
  - A packaging or labeling issue (Examples: unstable packaging; not adhering to labeling requirements for alcohol beverages);
- SK Craft Alcohol Producers are to have their own product recall procedures, detailing how they will address a product recall in compliance with this policy.
- SK Craft Alcohol Producers are to report all product recalls to SLGA.
- SK Craft Alcohol Producers who sell their product through the SLGA Distribution Centre or through a SLGA approved Specialty Liquor Warehouse should refer to Section 6 of the SLGA Beverage Alcohol Quality Assurance Policy for details on that Product Recall process.

## Definitions

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- Product Recall: When beverage alcohol product is removed from the market due to a problem with the product.

## Recall Process

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- A problem with an alcohol product that requires a recall could be identified through a variety of means, such as by the SK Craft Alcohol Producer, a Retail Store Permittee (RSP), a Commercial Permittee (CP), the public, SLGA or another source.
  - If SLGA becomes aware that a SK Craft Alcohol Producer's product requires a recall prior to the SK Craft Alcohol Producer becoming aware, SLGA will contact the producer to identify the problem and request that the SK Craft Alcohol Producer initiate a voluntary product recall. If the SK Craft Alcohol Producer does not initiate the product recall in a manner satisfactory to SLGA, then SLGA will proceed with issuing the product recall as SLGA deems necessary.
- When a SK Craft Alcohol Producer intends to proceed with a voluntary product recall, the following process must be followed:

### Step 1: Isolate Affected Product

- The SK Craft Alcohol Producer is required to isolate inventory of affected product that is in their possession and immediately halt distribution of affected product until next steps are determined.

### Step 2: Notification to SLGA

- The SK Craft Alcohol Producer is to send an email to [craftinquiries@slga.gov.sk.ca](mailto:craftinquiries@slga.gov.sk.ca) to advise SLGA that a product recall has been initiated. The SK Craft Alcohol Producer is required to provide SLGA with the following information:
  - Detailed description of the product including name, unit size, year, and any other relevant details;
  - Affected production lot numbers or batch codes;
  - Purchase order or delivery information;
  - Location of distributed product;
  - The root cause of the problem;

- How the problem has been contained and remedied; and
- Any other information considered to be relevant by SLGA.
  - Note: If some of this is not immediately available at the time the SK Craft Alcohol Producer initially emails SLGA, then the information must be provided as it becomes available.
- The SK Craft Alcohol Producer may request guidance from SLGA on how best to proceed if they are unsure whether a recall is required or if they are unsure how to effectively initiate the product recall, if required.
- The SK Craft Alcohol Producer must notify the Canadian Food Inspection Agency's (CFIA) Area Recall Coordinator of the product recall. The CFIA requires a distribution list along with addresses and phone numbers of the accounts affected.
- CFIA Area Recall Coordinator contact information can be found at: <https://www.inspection.gc.ca/food-safety-for-industry/archived-food-guidance/safe-food-production-systems/food-recall-and-emergency-response/cfia-notification/eng/1300377749580/1300378289195>

### Step 3: Product Recall

- The SK Craft Alcohol Producer's voluntary recall notice to its retail and commercial customers shall contain:
  - Instructions for RSPs, CPs and SLGA Distribution Centre to count and isolate their inventory and report back on their quantities to the SK Craft Alcohol Producer while they wait for remediation instructions from the SK Craft Alcohol Producer; and
  - Instructions for disposal and refund for affected product.
    - Refer to Appendix A for a suggested recall notice template.
- If SLGA determines, in consultation with the SK Craft Alcohol Producer, that the product recall requires a public warning, then SLGA and/or the applicable agency such as the CFIA, will issue a public notice, outlining the associated health risk involved. SLGA may consult with any other agency it deems necessary, including the CFIA and the SK Ministry of Health.
  - If a public notice is issued, the SK Craft Alcohol Producer is required to instruct RSPs and CPs to accept returns and issue refunds of the recalled product, provided proof of purchase is provided. The SK Craft Alcohol Producer is required to refund RSPs and CPs for returns they have accepted as a result.
- If the SK Craft Alcohol Producer does not initiate the product recall in a manner satisfactory to SLGA, then SLGA will proceed with issuing the product recall as SLGA deems necessary.

### Step 4: Investigation (if considered necessary by SLGA)

- Depending on the circumstances, SLGA may determine that a wider investigation is required.
- SLGA will contact the SK Craft Alcohol Producer to discuss the product recall in greater detail.
- Where necessary, SLGA will involve the CFIA, the SK Ministry of Health and any other provincial or federal agency deemed necessary to evaluate the seriousness of an issue and the appropriate action to take.
- Based on the results of the investigation, SLGA will determine the most appropriate action in consultation with the SK Craft Alcohol Producer.
- SLGA may require the SK Craft Alcohol Producer to send samples of product to an SLGA-approved laboratory for testing.
  - SLGA may direct the SK Craft Alcohol Producer on which products are to be sent away for testing.
  - The SK Craft Alcohol Producer is required to provide the results of the testing to SLGA.
  - If SLGA sends sample product away for testing to a SLGA approved laboratory, any failed tests may be billed back to the SK Craft Alcohol Producer.

### **Step 5: Follow-up (if considered necessary by SLGA)**

- SLGA will continue to work with the SK Craft Alcohol Producer to ensure that any problems that led to the product recall are resolved.
  - Depending on the circumstances, SLGA may take any regulatory action it deems to be appropriate. This may include placing restrictions on the SK Craft Alcohol Producer's manufacturing permit until associated problems have been resolved to the satisfaction of SLGA.
- Once problems associated with the recall have been resolved to the satisfaction of SLGA, the SK Craft Alcohol Producer will be given permission for the type of product to re-enter the market. Whether the actual recalled product can be corrected and released for sale will depend on the particular circumstances of the product recall.
- SLGA may increase oversight of the SK Craft Alcohol Producer for a period of time. This may include additional site visits, product testing and review of the SK Craft Alcohol Producer's policies and procedures.

### **Record Retention:**

- Records associated with the product recall must be retained for at least 2 years.

# Appendix A

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Sample Voluntary Recall Notification:

To All Affected Retail Store Permittee (RSPs); Commercial Permittees (CPs); & SK Craft Alcohol Producers:

An issue has been identified with Item *(insert item name, item number and product description here)*. Please remove from your shelves as soon as possible and await further instruction.

RSPs: Please communicate with any Commercial Permittees you deal with to ensure they are aware of the recall and are removing the affected product.

There has been an issue with *(state issue here and special handling instructions if required)*.

For items with the lot code *(enter lot code here)* please complete a claim and submit to *(enter email address here)*. A claim form is attached for your convenience. All customer returns, including Commercial Permittees, should be honoured. A claim will need to be completed for any returns with this lot code. Please attach a picture to your claim with the lot code easily viewable and **await disposition instructions**. The product lot code can be found *(insert where here)* on the *(front/back side)* of the bottle.

If you have any questions, please contact me at *(enter phone number here)*, or email your questions to *(enter email address here)*.

Thanks,

*(enter name of SK Craft Alcohol Producer here)*