

# MANUFACTURER PERMITTEE BULLETIN #04

Issued June 2023

Manufacturing Permittee Bulletins are issued on an as needed basis. The information is primarily intended for a Saskatchewan Craft Manufacturer permittee.

## Policy Change – Contract Labelling

The following requirement of The Saskatchewan Alcohol Manufacturing Policy Manual is no longer required effective immediately in order to align Saskatchewan with Federal requirements. This bulletin serves as a notice until a revised manual is posted.

### Repealed:

Chapter III s19 Contract Manufacturing by Craft Alcohol Producers states:

e) *Labelling Requirements*

i) *The contractor must include their name and location on the label in a manner that clearly identifies them as the manufacturer.*

### Replaced with

Chapter III s19 Contract Manufacturing by Craft Alcohol Producers states:

e) *Labelling Requirements*

i) *The contractor must follow the Canadian Food and Inspection Agency requirements for labelling.*

### For reference, from the CFIA website:

- Canadian Food and Inspection Agency (CFIA) requires that the name and principal place of business be placed on the label for alcoholic beverages
- CFIA goes on to further define name and principal place of business as :  
**Name and principal place of business of the person by or for whom the food was manufactured, prepared, produced, stored, packaged or labelled.**

The phrase "by or for whom the food was manufactured, prepared, produced, stored, packaged or labelled" is not specifically defined in the Safe Food for Canadians Act nor in the Safe Food for Canadians Regulations.

To help you to understand this phrase, please consider the following:

- o 'by whom' refers to the person who manufactured, prepared, produced, stored, packaged or labelled  
For example, food business ABC prepares food. Therefore, the name and the principal place of business is that of ABC.
- o 'for whom' refers to a person who manufactured, prepared, produced, stored, packaged or labelled the food for someone else. For example, food business ABC prepares food for DEF. Therefore, the name and principal place of business is that of DEF.

For further information about the labelling change, contact Tiffany Eide at 1-306-787- 8637 or teide@slga.com.

1. <https://inspection.canada.ca/food-safety-for-industry/traceability/traceability/eng/1522294721005/1522294781171>

2. <https://inspection.canada.ca/food-safety-for-industry/toolkit-for-food-businesses/glossary-of-key-terms/eng/1430250286859/1430250287405#listn>