

Saskatchewan Liquor & Gaming Authority

Beverage Alcohol Quality Assurance Policy

Effective September 24, 2018

Contents

1.0	Purpose	3
2.0	Quality Standards	3
3.0	Certificates of Analysis.....	3
3.1.	Core Listed Products	3
3.2.	Acceptable Certificates of Analysis	4
3.3.	Special Order Products	4
3.4.	Holiday/Seasonal Gift Packs or Limited-Quantity Allocations.....	5
3.5.	Cost of Testing/CoA	5
3.6.	Response to Quality Concerns	5
4.0	Product Recall	6
4.1.	Class 1 Recall	6
4.2.	Class 2 Recall	7
4.3.	Claims	8
5.0	Policy Review	8
6.0	Contacts.....	8
7.0	Revision History	8

1.0 Purpose

The Saskatchewan Liquor and Gaming Authority (SLGA) Beverage Alcohol Quality Assurance Policy (QA Policy) seeks to provide assurance to the general public that beverage alcohol products made available in Saskatchewan are authentic, compliant with applicable regulations and generally safe for consumption.

2.0 Quality Standards

Suppliers are responsible for delivering products that fully comply with all aspects of the quality standards specified by Federal and Provincial regulatory bodies, including but not limited to the following:

- Food and Drug Regulation: https://laws.justice.gc.ca/eng/regulations/c.r.c.,_c._870/index.html
- Health Canada: <https://www.canada.ca/en/health-canada/services/food-nutrition/food-safety/chemical-contaminants/maximum-levels-chemical-contaminants-foods.html>
- Health Canada list of permitted food additives: <https://www.canada.ca/en/health-canada/services/food-nutrition/food-safety/food-additives/lists-permitted.html>. Note that preservatives and additives not listed for a specific use are not permitted for that use. Also note that the terms “unstandardized foods” and “unstandardized beverages” used in the various tables also include unstandardized alcoholic beverages.
- Health Canada maximum residue limits for pesticides: <http://pr-rp.hc-sc.gc.ca/mrl-lrm/index-eng.php>
- Health Canada list of permitted sweeteners: <https://www.canada.ca/en/health-canada/services/food-nutrition/food-safety/food-additives/lists-permitted/9-sweeteners.html>
- CFIA labelling requirements for alcoholic beverages: <http://www.inspection.gc.ca/food/requirements-and-guidance/labelling/industry/alcohol/eng/1392909001375/1392909133296?chap=0>

3.0 Certificates of Analysis

3.1. Core Listed Products

Certificates of Analysis (CoA) are required for Core-listed products distributed through the SLGA DC. A valid CoA must be submitted to SLGA for each Core-listed product; different formats of the same product will be covered under one CoA. One CoA of the supplier’s choosing will be required for each mixer/variety pack.

Products selected for new listings will not be ordered until SLGA has a valid CoA on file; in the prolonged absence of a CoA, SLGA reserves the right to deny the product listing.

Each year, SLGA will select up to 2% of Core-listed products that will require an updated CoA. SLGA will notify the supplier when their product has been selected and an updated CoA is required.

CoAs should be emailed to listings@slga.gov.sk.ca.

3.2. Acceptable Certificates of Analysis

CoAs from other jurisdictions are acceptable, including:

- Canadian Vintners Alliance (VQA)**;
- Liquor Control Board of Ontario (LCBO);
- Société des alcools du Québec (SAQ);

**VQA certificates will be accepted only for VQA-certified products. Non-VQA products must be tested at an ISO/IEC 17025 accredited lab.

Currently, the only known accredited lab in Saskatchewan is:

- [Prairie Tide Analytics](#)

CoAs from independent labs are acceptable if the lab is ISO/IEC 17025 accredited in the analysis of alcoholic beverages. When providing a CoA from an independent lab, SLGA also requires a certificate of accreditation from the lab.

CoAs for newly-listed product must have been issued within the last 2 years. CoAs must be in English.

3.3. Special Order Products

Special Order product(s) are exempt from the QA Policy and do not require a CoA.

PERSONAL USE

Consumers and clubs ordering Special Order products for personal consumption will be advised that Special Order products are not part of SLGA's core listed products, and may not have been tested and may not meet QA standards; consumers and club members are required to acknowledge in writing the potential risk associated with Special Order products. In submitting such orders, consumers and clubs acknowledge the following:

1. The potential risk that product may not be fit for consumption; and
2. May not meet federal and provincial statutory and regulatory requirements.

For consumers or clubs refusing to acknowledge and accept such risks, SLGA may, at its discretion, refuse to order and/or import such product on behalf of consumers and clubs.

RETAIL STORE PERMITTEES AND COMMERCIAL PERMITTEES

Retail Store Permittees (RSPs) and Commercial Permittees (CPs) ordering Special Order products for commercial use are required to acknowledge and accept responsibility that Special Order products may not have been tested and may not meet QA standards. In submitting such orders, RSPs and CPs acknowledge the following:

1. The potential risk that product may not be fit for consumption;
2. May not be of merchantable quality; and,

3. May not meet federal and provincial statutory and regulatory requirements.

By submitting Special Order requests, RSPs and CPs assume responsibility for the quality and safety of the product and indemnify SLGA from and against, losses, damages, liabilities, actions, claims, costs, charges and expenses incurred by SLGA in respect of any threatened or commenced action or proceeding made by a party who purchased a Special Order product from a permittee.

In the event an RSP or CP refuses to acknowledge and accept the risk, SLGA may, at its discretion, refuse to order and/or import product on behalf of the RSP or CP.

3.4. Gift Packs / Limited-Quantity Allocations / Pre-Orders

Gift Packs, Allocation, and Pre-Order products are exempt from the QA policy and do not require a CoA.

Agents/suppliers of Holiday Gift Packs or Allocation products assume full responsibility for the safety of these beverage alcohol products, and for ensuring products meets applicable regulatory requirements, including packaging/labelling requirements. Agents/suppliers are required to indemnify SLGA against all losses, damages, liabilities, actions, claims, costs, charges and expenses arising from the product's lack of fitness for purpose, lack of merchantable quality, and/or lack of compliance with federal and provincial statutory and regulatory requirements.

3.5. Cost of Testing/CoA

The cost for testing of the beverage alcohol and/or obtaining a CoA is the responsibility of the agent/supplier.

SLGA reserves the right, in its sole discretion, to test samples of beverage alcohol product at any time. The cost of SLGA-initiated testing and all related shipping fees will be charged directly to the agent/supplier.

3.6. Response to Quality Concerns

In the event of an 'unacceptable' testing result, beverage alcohol products in the SLGA DC and RSP locations may be disposed of or shipped back to the agent/supplier, at the agent/supplier's expense.

In the event that chemical or quality issues arise with products distributed through the SLGA DC, including from a consumer complaint, SLGA will launch a full investigation of the product. Products that do not comply with testing requirements, organoleptic assessment, or packaging and labeling requirement will be treated in a manner appropriate to the type of defect or non-compliance, at SLGA's sole discretion.

One or more of the following actions may occur:

- Available stock at the DC is placed on hold and unavailable for ordering;
- Notice issued to RSPs and Commercial Permittees advising that stock be withdrawn from sale to the general public;
- Public recall;
- Corrective action to be taken by the agent/supplier to correct the deficiency.

Suppliers determined to be responsible for a defect or non-compliance will be responsible for all costs to correct a deficiency, or remove or dispose of impacted beverage alcohol product. These costs may include one or more of the following:

- A rebate to SLGA to reduce the SLGA wholesale price of the product;
- Correcting packaging or labeling deficiencies;
- Product returns from the DC to the supplier;
- Destruction of the product at the DC.

4.0 Product Recall

SLGA has two types of product recalls processes: Class 1 and Class 2. SLGA works with the National Quality Assurance Committee (NQAC) and the National Canadian Food Inspection Agency (CFIA) to determine the seriousness of an issue and the appropriate level of recall.

4.1. Class 1 Recall

A Class 1 recall involves a public notice to inform customers of a potentially serious quality or safety issue with one of its products. These types of recalls are very rare and occur on average about once every two years. Examples of Class 1 recalls include the presence of glass particles or a chemical contaminant that exceeds Canadian limits. All the other Canadian liquor jurisdictions are informed of all Class 1 recalls. In cases where the issue is started in another province, a member of the NQAC will notify the membership, to alert them of the situation. The Product Manager (Saskatchewan member of NQAC) will disseminate the information and enact the recall process.

CLASS 1 RECALL PROCESS

- The agent/supplier notifies SLGA that potentially serious quality or safety issue has occurred with one of their products. Agent/supplier provides product information, including affected lot numbers/batch codes.
- SLGA Product Manager notifies the DC to check inventory, isolate and put on hold any inventory that is affected, to prevent shipping it to RSPs.
- SLGA Product Manager notifies Customer Relations, who notifies all RSPs about the recall, asking them to check and isolate their inventory and to respond back with their quantities. RSPs are asked to notify their Commercial Permittees as well.

- The supplier and CFIA, advise NQAC and SLGA on the next recommended communication. Depending on the number of units shipped/sold and the severity of the quality issue will determine if a Class 1 recall is initiated.
- After the confirmation of inventory in Saskatchewan, and the determination of a Class 1 recall, SLGA Product Manager will work with Customer Relations on internal messaging and Communications Branch on external messaging. At that point, either the supplier or SLGA will initiate a public recall message. A standard message for inquiries will be communicated within the Supply Chain and Category Management Division. This will include the direction for customers and Commercial Permittees to return the product to the RSP the product was purchased from. The RSP will determine the affected product and hold returned product until claims process and disposition plan are communicated.
- SLGA Product Manager will work with the supplier to determine the best disposition plan, through RSPs and SLGA's DC. Once a disposition plan has been determined, this will be communicated through Customer Relations to all affected RSPs.
- The supplier and CFIA complete follow-ups with SLGA Product Manager, to obtain copies of communications and possible random location checks to safeguard in the future.

4.2. Class 2 Recall

A Class 2 recall involves product that does not pose a health risk, but is discontinued from sale due to quality reasons. Examples of Class 2 recalls include the presence of natural sediment or a product that is stale-dated.

CLASS 2 RECALL PROCESS

- The supplier (manufacturer, representative or agent) notifies SLGA of a non-serious quality control issue. They provide product information, including affected lot numbers/batch codes. In cases where the issue is noticed in an RSP by staff or a customer, they notify their Customer Relations representative who will then notify the SLGA Product Manager. In this case, SLGA Product Manager verifies with the DC that product is indeed affected. If available, the DC will provide the location of all affected product, and notify the supplier to confirm affected product, and receive lot numbers/batch codes.
- SLGA Product Manager notifies the DC to isolate and put on hold any inventory that is affected, so as to not continue shipping it to RSPs.
- SLGA Product Manager also notifies Customer Relations, who notify all RSPs about the recall, asking them to check and isolate their inventory and to respond back with their quantities. RSPs are asked to notify their Commercial Permittees as well.
- After the confirmation of inventory in Saskatchewan, and the determination of a Class 2 recall, SLGA Product Manager will work with Customer Relations on internal messaging and Communications Branch on external messaging, if necessary. A standard message for inquiries will be communicated within the Supply Chain and Category Management Division; this will include the direction to return the product to the RSP it was purchased

from. The RSP will determine the affected product and hold returned product for shipment and disposal.

- SLGA Product Manager will work with the supplier to determine the best disposition plan, through RSPs and SLGA's DC.

4.3. Claims

SLGA will communicate to all RSPs, details about affected product, including dates to return product and submit claims by. SLGA amalgamates claims and submits to Finance to charge-back the supplier and credit appropriate RSPs.

5.0 Policy Review

The SLGA QA Policy review will be conducted annually to ensure the effectiveness of the policy; necessary improvements will be incorporated into the updated version. The review will consider the result of internal audits, performance audits, feedback from agents/suppliers and SLGA clients.

6.0 Contacts

Questions concerning the QA Policy should be directed to:

Tara Mantyak – Manager, Category Strategy

tmantyak@slga.gov.sk.ca

Glen Raboud – Director, Supply Chain and Category Management

graboud@slga.gov.sk.ca

7.0 Revision History

Date	Revisions Made
September 24, 2018	Posted
November 2018	Edited: 3.2 Acceptable Certificates of Analysis/Laboratories Edited: font to improve spacing Added: Appendix A - FAQs
April 2021	Edited: 3.1 Core Listed Product: CoAs are now required only once per product; each year, some randomly-selected products will require a renewed CoA; mixer/variety packs now require only one CoA. Edited: 3.4: Added Pre-Orders Edited: improved formatting, word clarity

	Updated: 3.2 Acceptable Certificates of Analysis: added Prairie Tide Analytics to known accredited labs.
--	--