

# LCBO

## *Safe Food for Canadians Regulations* Traceability and Lot Code requirements: Frequently Asked Questions

This document has been created to support the industry with the application of product traceability and lot code requirements of the *Safe Food for Canadians Regulation* (SFCR) when doing business with LCBO.

### Section A - Traceability

**The *Safe Food for Canadians Regulations* require that food businesses track the movement of their food in the supply chain – forward to the immediate customer and back to the immediate supplier. These requirements apply to a broad scope of food businesses.**

Food is described broadly as anything sold or represented as food and drink for consumption, which includes beverage alcohol drinks.

#### **1) What is Traceability?**

Traceability is the ability to track the movement of a food or a food commodity, one step back and one step forward in the supply chain. Under the *Safe Food for Canadians Regulations*, traceability requirements apply to food businesses that:

- import food
- export food
- distribute or send food products across provincial or territorial borders
- manufacture, process, treat, preserve, grade, store, package or label food to be exported or sent across provincial or territorial boundaries
- sell food to consumers at retail, which would need to be traced one step back but not forward to the consumer

#### **2) What are Traceability requirements under the SFCR?**

The *Safe Food for Canadians Regulations* set out traceability requirements for food products including beverage alcohol. This new regulation requires that all prepackaged consumer selling units must bear a lot code, and products sold must have traceability records one step forward and one step back in the supply chain.

Traceability documentation must:

- **identify the food** (common name, name and address of the manufacturer, and lot code or other unique identifier);
- **trace the food one step back** to the immediate supplier, including the date of transaction;
- **trace the food one step forward** to the immediate customer, including the date of transaction; and
- if applicable, **identify and trace back the ingredients** used to make the food.

Traceability documentation must be available in English or French. For more details on the traceability requirements, please visit [CFIA's Traceability for Food](#) webpage.

**3) What traceability requirements are applicable in a Direct Delivery program (i.e. upon receiving a Purchase Order, Supplier/Vendor and/or Agent delivers products directly to the LCBO Retail Store or LCBO Wholesale client)?**

When the product doesn't flow through the LCBO warehouse and is delivered directly to the LCBO Retail Store or Wholesale client (e.g., grocery), the Supplier/Vendor and/or Agent is required to maintain and provide accurate Traceability documentation to the LCBO within 5 hours from the request for such records.

**4) What are the traceability requirements for products shipped through a 3rd Party Distributor/Consolidator/Co-Packer?**

All Suppliers are required to ensure that their 3<sup>rd</sup> Party Distributors/Consolidators/Co-Packers maintain accurate Traceability documentation. Supplier must provide accurate traceability documentation to the LCBO within 5 hours from the request for such records.

**5) What are the traceability requirements for Food Value-Adds product?**

Food Value Add products are also subject to regulatory requirements pertaining to product composition, labeling and traceability. The LCBO updated the framework supporting the Value-Add program to incorporate specific requirements for food products to ensure compliance with the SFCR.

Food Value-Add submissions that are considered for the Promotional Program require to undergo an Attestation and Traceability information disclosure. Suppliers are required to complete a Food Product Value-Add Questionnaire where the Agent/Vendor provides required information related to product composition, labeling and traceability. Vendors must be aware that Traceability documentation must be provided to the LCBO within 5 hours from the request for such records.

**6) How long do I need to keep Traceability documentation?**

Records pertaining to traceability must be kept a minimum of 2 years following the sale of the product to another person or sold at retail. Suppliers/Vendors need to make sure that the traceability documents are accessible in Canada.

## Section B - Lot Code

### 7) What is a lot code?

**Lot code** refers to a code that can be used to identify a lot that was manufactured, prepared, produced, stored, graded, packaged or labeled, under the same conditions. A lot code can be numeric, alphabetic, or alphanumeric.

### 8) Do these changes affect all product categories or only certain ones?

LCBO requires all beverage alcohol to have a lot code regardless of product category or sales channel. This also applies to all food items, including non-alcoholic beverages.

### 9) Why do I need a lot code?

A lot code is required as part of the traceability requirement detailed in the Safe Food for Canadians Regulation (SFCR) that came into force in January 2019. The regulation became enforceable as of July 15, 2020.

More details about the lot code requirements can be found at CFIA's [Food safety for industry](#) page; the full Safe Food for Canadians Regulation can be found [here](#).

### 10) When is the deadline for products to bear a lot code in market?

Product that has been packaged and labelled on or after July 15, 2020 is required to meet the new lot code labelling requirements.

Beverage alcohol that has been packaged and labelled prior to July 15, 2020 and does not meet the new lot code labelling requirements will be permitted to be sold at retail. All other traceability requirements still apply.

### 11) What are the requirements for lot code legibility?

The regulation is not prescriptive in the requirements for legibility. The regulation does require that lot codes must be clearly and prominently shown and readily discernible and legible to the purchaser under the customary conditions of purchase and use. Best practice would be to have lot codes shown in characters that are at least 1.6 mm (1/16 inch) in height.

### 12) Is laser etching acceptable for lot codes?

Laser etching is acceptable as long as the legibility requirements are met.

### 13) Is it acceptable to print the lot code on the foil capsules or must it be on the label or bottle?

It is an industry best practice not to place lot codes on an element of the product that is removable such as the foil capsule. Having the lot code available on the bottle after consumption of the product helps with the identification/traceability of quality issues. However, this is not a

requirement and vendors must weigh the risk to their business if a quality issue is identified and the lot cannot be traced in the event a recall action is initiated.

**14) Are there requirements as to where the lot code can be on the selling unit?**

The product code marking may appear anywhere on the consumer unit as long as legibility requirements are met; best practice would be that the lot code should be easily identifiable by the consumer and should not be on or under removable components of the selling unit (i.e. cap or foil wrap).

**15) What should a lot code look like?**

The industry best practice would be for a lot code to begin with one of the following: Lot number, Lot No., Lot, or (L) as this makes it clear to the retailers and the consumers which numbers on the bottle are the lot.

The vendor may use any sequence of numbers, letters or both as long as that code can be used to identify a lot that was manufactured, prepared, produced, stored, graded, packaged or labelled, under the same conditions.

**16) Can a lot number be expressed as a date on the selling unit?**

Yes, a lot code can be expressed as a date on the selling unit. Examples of types of dates that are commonly used as a lot code, are:

- Packaging date
- “Best before” date
- Freshness date

**17) Can a vintage year be used as a lot code?**

A food business will decide how best to assign a lot code that defines a quantity of food that was manufactured, prepared, produced, stored, graded, packaged or labeled, under the same conditions. According to CFIA, applying a “vintage year” would be considered compliant with meeting SFCR’s lot code requirements provided that it is identifying a defined quantity of food produced from grapes harvested in the identified “vintage year”. The following considerations should be kept in mind:

- CFIA uses lot code in combination with already required labelling specific requirements such as common name and principal place of business to assist in identifying a product subject to a food safety investigation or recall.
- The larger the scope of the lot code could mean the larger the scope of the food safety investigation or recall. In this case, if a food safety incident happened to occur with a particular vintage year of a particular product, the entire vintage year of that product could potentially be affected.

CFIA encourages food businesses to use a more specific lot code to help facilitate tracking a product more quickly in the marketplace in case there was a food safety investigation – knowing exactly when a problem occurred and which product(s) need(s) to be removed from the supply chain is critical. In

addition, the more specific the lot code, the easier it is for consumers to determine whether they have a recalled product in their home. A more specific defined lot code may also limit the economic impact of the recall on the food business involved.

**18) Some older vintage dated products may not have a lot code; will corrective stickers be required?**

Beverage alcohol that has been packaged and labelled prior to July 15, 2020 and does not meet the new lot code labelling requirements will be permitted to be sold at retail. All other traceability requirements still apply.

**19) For products that have a primary and secondary package, e.g. a bottle inside a carton/sleeve that represents the consumer selling unit, does the lot code have to appear on both the primary and secondary package?**

The best practice is to have a lot code on both the primary and secondary package, e.g. bottle and on the carton. This is to allow the lot code to be visible at time of purchase and time of use. In the event of a recall it would be a significant advantage to the vendor to have the lot code on the external carton, so that the carton will not be damaged to locate the lot in question on the bottle. Also, in the event of a product quality issue identified at the time of consumption it is beneficial to have the lot code available to the consumer on the bottle (in the eventuality that the outer carton is discarded).

At this time, it is acceptable to have a lot code on either the carton or the bottle.

**20) We have a mixed pack of various product flavours sold in a carton. Each can inside the carton will have a lot code printed on the can; does the carton require a lot code?**

It is best practice for the mixed pack carton to bear a lot code, as well as the individual units inside the pack. At this time, it is acceptable to have a lot code on either the carton or individual units inside the pack.

**21) Is it mandatory for the lot code to be on the shipping container (case) or is it acceptable to just have it on the bottle?**

All consumer prepackaged selling units must have a lot code. In addition, it is a recommended industry practice that the corresponding lot code is also applied to the shipping container. In the event of a recall or product inspection it would be a significant advantage to the vendor to have the lot code on the shipping container, so that the lot in question can be isolated as efficiently as possible.

**22) I have the lot number printed on all shipping containers (cases); do I also need to have a lot code on the bottle?**

As referenced in the question above, lot codes are recommended on the shipping container. However, as per the new *Safe Food for Canadians Regulations* all prepackaged consumer goods must have a lot code on the selling unit.

**23) May the lot code on the bottle have additional coding/digits then the lot code recorded on the shipping container?**

It would be allowable to have a code on the bottle which also includes supplementary information in addition to the lot code on shipping container.

An example of this would be:

On the shipping container it would be acceptable to show **LOT:191018**

Bottle: **LOT:191018 T15 14:27**

Where **LOT:191018**, would be the lot code, and T15 may be a tank and 14:27 a time stamp.

**24) Can I have a mix of lot codes within a shipping container (case)?**

LCBO requires all product selling units within a shipping container (case) to bear the same lot code. This facilitates the ability to segregate affected lots, in the most efficient and economical manner in the event of a quality investigation or product recall.

**25) Can I have a mix of lot codes on a pallet or within a PO?**

At this time LCBO will accept a mix of lot codes on a pallet or within a purchase order (PO). Wherever possible it is recommended to limit the number of unique lot codes that are within a pallet or PO. In the event of a quality investigation or product recall, this facilitates the ability to segregate affected lots in the most efficient and economical manner.

**26) What are the consequences for noncompliance?**

The traceability requirements for a lot code came into force as of July 15, 2020.

In April 2020 due to pandemic conditions, until further notice, CFIA advised that they will not prioritize compliance activities associated with the July 15, 2020 coming into force date for the manufactured food sector. However, suppliers are encouraged to continue their efforts on ensuring that traceability requirements are met.

At this time, LCBO will continue to issue warnings for missing lot code. Starting in 2022, corrective measures are planned to evolve to include corrective labelling and/or application of penalties for noncompliance.

---

Published on March 2022, to align with the Safe Food for Canadians Act & Regulations. In producing this document, some requirements may not have been included and some may be ambiguous. The LCBO takes no responsibility for any problems / errors resulting from using this document. It is the supplier responsibility to ensure that a product complies with all applicable Canadian laws, Canadian Association of Liquor Jurisdictions (CALJ) standards, and LCBO Product Packaging Standards and other LCBO operational and policy requirements.