



Registering Products in Growlers

Approved By:	Director, Wholesale Supply Chain
Date First Approved:	October 2019
Date of Last Review:	October 2019
Contact:	Manager, Vendor Relations

1.0 Purpose

To provide a definition of Growlers and clarify how manufacturers register liquor products sold in Growlers with the Liquor Distribution Branch (LDB).

2.0 Scope

This policy applies to all BC manufacturers of beer, wine or cider selling product in Growlers that are filled in front of the customer.

3.0 Definitions

Growlers	Sanitary glass, stainless steel or ceramic containers that are brought by customers or sold by manufacturers and filled by an employee in front of the customer for the customer to transport product off-site, with the intention that the Growler will be re-used multiple times.
----------	---

4.0 Policy

4.1 General

- The *Liquor Distribution Act* requires that all liquor products sold in BC must be registered with the LDB.
- BC manufacturers of beer, wine or cider may sell product in a Growler that is filled in front of the customer. Growlers may be filled from a keg, a tap (i.e., a tap connected directly to a tank in the manufacturing site), or, for beer products only, a pipeline to the manufacturing site.
 - These manufacturers must have an onsite store endorsement or, if they are a brew pub, an off-premises sales endorsement.
- Growlers that are filled in front of the customers are intended to be re-used multiple times and therefore are not included in the container recycling program, which includes a container recycling fee in the wholesale cost.
 - In order to provide an incentive for customers to reuse Growlers, manufacturers that sell Growlers must charge customers a material fee (such as \$5 or more) for the Growler.
- Growlers must be one of the following standard sizes: 500 ml, 0.95 L (32 US fl oz), 1 L, 1.89L (64 US fl oz), 2 L, 3.79 L (128 US fl oz) or 4 L.
- The LDB classifies Growlers as packaged liquor products for calculating wholesale mark-up.



4.2 Registering Growlers that are filled in front of the customer

- If Growlers are filled from a keg or a pipeline that already has a Stock Keeping Unit (SKU) registered for the product, a new SKU does not need to be registered for filling Growlers. The product is already considered registered under the keg or pipeline.
- If Growlers are filled from a tank (i.e. a tap connected directly to a tank in the manufacturing site), a separate SKU must be registered for each variety of beer carried, as the product is not already registered in the tank. Each size of Growler accepted by the manufacturer must be registered (this excludes products with generic seasonal SKUs).
 - Refer to the *LDB's Generic Seasonal SKUs* policy for the rules on registering product under generic seasonal SKUs.
- All products including Growler refills must comply with the Canadian Food Inspection Agency Labelling Requirements for Alcoholic Beverages, the *Safe Food for Canadians Regulations* as well as the LDB's *Social Responsibility Criteria for Registration of Liquor Products* policy for brand names, text, images, labels and packaging, and any other component of the product deemed relevant.
 - When product is sold in a Growler that the customer brought with them, required labelling could be affixed to the Growler on a sticker or a tag.

4.3 Wines in Growlers

- Wine manufacturers are required to comply with Canadian Food Inspection Agency Standardized Container Sizes for Wine. The *Wines of Marked Quality Regulation* sets standards for BC VQA wine. Wine sold in Growlers would not qualify as BC VQA.

5.0 References

[BC Wine Authority Wines of Marked Quality Regulation](#)
[Canadian Food Inspection Agency Labelling Requirements for Alcoholic Beverages](#)
[Canadian Food Inspection Agency Standardized Container Sizes for Wine](#)
[Registration Process Guide for BC Manufacturers Wine and Spirits](#)
[Registration Process Guide for BC Beer Manufacturers](#)
[Safe Food for Canadians Regulations](#)
[Social Responsibility Criteria for Registration of Liquor Products](#) (access to the [LDB Vendor Website](#) required)