



Production of Hand Sanitizer and Sanitizer by BC Manufacturers during COVID-19

Approved By:	Chief Financial Officer
Date First Approved:	April 2020
Date of Last Review:	September 2021
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1.0 Purpose

To outline the BC Liquor Distribution Branch (LDB)'s requirements regarding the production of alcohol-based hand sanitizer and sanitizer by licensed BC liquor manufacturers in the context of the provincial public health emergency related to COVID-19.

2.0 Scope

This policy applies to all licensed liquor manufacturers in BC, including wineries, breweries and distilleries.

3.0 Policy

3.1 General

- Pursuant to directives issued by the Liquor and Cannabis Regulation Branch (LCRB), BC liquor manufacturers are authorized to produce and donate or sell alcohol-based hand sanitizer and sanitizer in response to the provincial public health emergency related to COVID-19. This is in place as long as authorized by the LCRB.
- BC liquor manufacturers must be able to fully account and maintain records for all alcohol used in the production of hand sanitizer and sanitizer at their facility.
 - Craft distilleries are required to report their neutral grain spirit (NGS) inventory levels to the LDB (via email at regemail@bclddb.com) in litres, including amounts purchased, amounts used in production of sanitizer or hand sanitizer, and amounts remaining in inventory, on a monthly basis while this policy remains in effect.
 - If requested by the LDB, records should clearly indicate the supplier of the alcohol used in the production of hand sanitizer and sanitizer, the volume of alcohol produced/received and whether all of the alcohol was used. If all of the alcohol was not used, the records should clearly indicate whether the excess was destroyed or used for another purpose.
 - This is only required for BC liquor manufacturers involved in producing hand sanitizer and sanitizer; if a BC liquor manufacturer is solely packaging hand sanitizer and sanitizer that has been produced by another liquor manufacturer, the manufacturer that is packaging does not have to track the alcohol in the hand sanitizer and sanitizer that they packaged. That is the responsibility of the liquor manufacturer that produced the hand sanitizer and sanitizer.
- Alcohol used in the production of hand sanitizer and sanitizer is exempt from the provincial wholesale mark-up.

- Any BC liquor manufacturer that plans to produce hand sanitizer and sanitizer must notify the LDB via email at regemail@bcldb.com.
- All BC liquor manufacturers involved in the production of hand sanitizer and sanitizer are responsible for meeting all other non-liquor requirements required by other entities relating to health and safety, local government business licensing and insurance requirements.

3.2 Manufacturer-specific requirements

- If permitted by way of amendment to their sales agreement with the LDB, designated craft distilleries may procure NGS or other alcohol strictly for the production of hand sanitizer and sanitizer.
 - The NGS/alcohol that is procured for the purpose of producing hand sanitizer and sanitizer must not otherwise be used to produce any alcohol beverage products, in compliance with the LDB's Craft Distillery policy.
 - Designated craft distilleries must immediately dispose of any leftover NGS/alcohol once the LCRB's authorization to produce hand sanitizer and sanitizer is over.
- Any craft distillery that chooses to use sugar in distilling for hand sanitizer and sanitizer production is permitted to do so. It is expected that the inventory and its use is accounted for, and that the sugar is not fermented to produce any alcohol beverage products.
- A distillery (craft or commercial) can procure kegged beer from a brewery to distill this alcohol to make it into hand sanitizer and sanitizer. It is expected that both the brewery and distillery accounts for this movement in inventory. This would include any alcohol that has already been packaged into a keg format or bulk alcohol.
- BC craft distilleries that procure NGS/alcohol for the purpose of producing hand sanitizer and sanitizer must immediately dispose of any leftover NGS/alcohol once the LCRB's authorization to produce hand sanitizer and sanitizer is over.
- BC breweries that procure NGS/alcohol for the purpose of producing hand sanitizer and sanitizer must immediately dispose of any leftover NGS/alcohol once the LCRB's authorization to produce hand sanitizer and sanitizer is over.
- BC wineries that procure NGS/alcohol for the purpose of producing hand sanitizer and sanitizer may keep any leftover NGS/alcohol once the LCRB's authorization to produce hand sanitizer and sanitizer is over, for future use in fortifying wine product.

4.0 References

[LCRB Policy Directive No 20-08](#)
[LCRB Policy Directive No 20-09](#)
[LCRB Policy Directive No 20-10](#)
[LCRB Policy Directive No 21-19](#)