April 1, 2020

RE: Revised and New Policy Directive for Hand Sanitizer Manufacturing and Packaging

In support of ongoing efforts during the COVID-19 pandemic, the BC Liquor and Cannabis Regulation Branch (LCRB) has put in place time-limited measures to support the production of essential health and safety products, specifically hand sanitizer manufacturing and packaging.

While existing distillery licensees in BC have in place the necessary requirements and infrastructure to take immediate advantage of the opportunity, the LCRB is authorizing brewery licence holders, winery licence holders and distillery licensees to use their licenced facility to manufacture and/or package alcohol-based hand sanitizer. Manufacturers are responsible for compliance with all applicable requirements, including those imposed by Health Canada. Licensees can donate or sell the hand sanitizer they have manufactured. This directive does NOT permit the holder of a brewery or winery licence to distill spirits.

However, due to the highly flammable and combustible nature of the base product, interested manufacturers are strongly encouraged to investigate and understand what is required starting with Health Canada’s guide on interim expedited licensing and application and the WHO Recommended Handrub Formulations.

As important in considering hand sanitizer manufacturing and packaging is the ability to comply with non-liquor requirements relating to health and safety, local government business licensing and insurance requirements including the Office of the Fire Commissioner BC Fire Code.

For further details of the new BC LCRB policies in effect until July 15, 2020 please see the following:

**BC LCRB Policy Directive 20-09 – Breweries and Wineries, manufacture packaging and sale of hand sanitizer**
(Authorize breweries/wineries to manufacture or package, sell or donate hand sanitizer)

**BC LCRB Policy Directive 20-08 – Breweries and Wineries, manufacture packaging and sale of hand sanitizer**
(Clarifies that distillery licensees have authorization to use their establishments to manufacture and/or package alcohol-based hand sanitizer and are responsible for compliance with all applicable requirements, including those imposed by Health Canada)

**BC Liquor Distribution Branch (LDB) Requirements for the Production of Hand Sanitizer**
(For all licensed BC liquor manufacturers (including Breweries, Land-based Wineries, Commercial Wineries, Craft Distilleries and Commercial Distilleries)

Further information regarding liquor and cannabis control and licensing in British Columbia is available on the Liquor and Cannabis Regulation Branch website.

Further information regarding LDB Finance Wholesale, Regulatory and Compliance, please contact: regemail@bcldb.com