



## Frequently Asked Questions on Traceability and Lot Code Requirements

### 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.

### 2) What are the Traceability requirements under the [Safe Food for Canadians Regulations](#) (SFCR)?

The Safe Food for Canadians Regulations set out traceability requirements for food products including beverage alcohol. This new regulation requires that all prepackaged 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.

### 3) What is a lot code?

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

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

A lot code is necessary to meet the federal traceability requirement outlined in the Safe Food for Canadians Regulation (SFCR).

### 5) Which product categories must adhere to these guidelines?

Regardless of the product category or sales channel, lot codes are a federal traceability requirement through the SFCR. All products listed at the Nova Scotia Liquor Corporation (NSLC) must adhere to these guidelines.

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

The regulation doesn't specify legibility requirements. It does, however, mandate that lot codes must be prominently displayed, easily discernible, and legible to the buyer under typical conditions of purchase and use.

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

Laser etching is acceptable if the legibility requirements are met.

**8) Can lot codes be placed on the bottle using an additional sticker?**

Yes, using stickers is acceptable if the legibility requirements are met.

**9) What is a selling unit?**

A single-selling unit can vary depending on the product and is based on the listed article. It could be a single-serve can, a six-pack, or a 750 ml bottle.

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

The product code marking is permitted anywhere on the individual unit for sale, provided it meets legibility requirements. Ideally, the lot code should be easily identifiable for the consumer and NSLC team as a best practice. It should not be on or under removable components of the selling unit (i.e. cap or foil wrap).

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

A lot code can be numeric, alphabetic, or alphanumeric. The industry best practice would be for a lot code, to begin with, one of the following:

- Lot number
- Lot No.
- Lot
- (L)

This would be followed by any sequence of numbers, letters, or both which would identify a lot that was manufactured, prepared, produced, stored, graded, packaged, or labeled, under the same conditions. The lot code can be applied anywhere on the selling unit as long as it is legible. Perennia can provide more guidance on lot code formatting options if needed.

**12) 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

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

No, the NSLC will not accept vintage year as a lot code. We recommend applying a lot code that is specific to the individual production or bottling run as many external factors can affect product quality. If one bottle was found to have an issue, the entire vintage year of that product could be in jeopardy.

**14) 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?**

While it is mandatory to include a lot code on the primary packaging (the selling unit), it is recommended to also include it on the secondary packaging (e.g., carton).

In the event of a recall, having the lot code prominently displayed on the outer carton facilitates efficient identification of affected products without compromising the integrity of individual items.

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

If a product is found to not have a lot code at the time of receipt in the distribution centre, the inventory will be set aside and quarantined until a lot code can be applied. If reasonable efforts are not made to resolve within a two-week period the product will be returned to the supplier.

If a lot code is not provided at the time of listing, the listing application will be returned to the supplier to complete and the process will be paused and the article will not be ordered. This could result in the loss of a listing if the lot code is not provided.

**16) What is the NSLC doing to ensure lot codes are on all selling units?**

The NSLC will be verifying lot codes are present at the time the inventory is received in the distribution centre.

**17) Who should I contact if I have additional questions?**

Please contact your relevant Category Manager with any questions on this process.

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Additional information on 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](#)

Questions on NSLC's Product testing program can be directed to Ash Joshy at [Product.testing@mynslc.com](mailto:Product.testing@mynslc.com)

If you have additional quality and food safety questions, or for more information about setting up a traceability program at your facility, you can reach out to [Perennia](#) at [innovation@perennia.ca](mailto:innovation@perennia.ca)

Questions about [Acadia Laboratory for Agri-food and Beverage](#) can be directed to [alab@acadiau.ca](mailto:alab@acadiau.ca)