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About this Consultation

This consultation paper is directed to the following businesses, individuals, and associations in Ontario’s beverage alcohol industry: wine manufacturers, beer manufacturers, spirits manufacturers, liquor delivery services, manufacturers’ representatives, and ferment-on-premise operators. It is also directed to the various government bodies, social health and responsibility groups, industry associations and any other stakeholder groups whose mandate relates to the liquor manufacturing and distribution sectors.

The issues that are canvassed in this paper fall exclusively within the existing regulatory mandate of the Alcohol and Gaming Commission of Ontario (AGCO) and therefore do not contemplate changes to legislation or regulations. This consultation is an opportunity for you to provide input and share ideas on the steps we can take together to reduce the administrative burden on businesses, remove barriers to jobs and economic growth, and create a safe, fair and competitive regulatory environment for Ontario’s beverage alcohol industry.

Throughout this paper, a number of specific ideas for reforms to AGCO processes and policies are proposed and a number of related questions are posed for your feedback. Some ideas and questions will be applicable to your organization. Others may not. We are eager to hear from all who will be affected.

The issues described in this paper and the ideas proposed are not meant to be exhaustive. The AGCO hopes they will prompt an enthusiastic discussion about how businesses and individuals in Ontario’s liquor manufacturing and distribution sectors believe the system of oversight can be improved.

This document has been distributed to a number of businesses, government agencies and stakeholders. It is also posted on the AGCO’s website at www.agco.on.ca.

You can provide your written submissions directly to the AGCO by no later than September 20, 2013 in any of the following ways:

- E-mail your written submission to the AGCO at the following dedicated e-mail address:
  consultation@agco.ca
- Fax your written submission to the AGCO at the following number: (416) 326-8054
- Mail your written submission to the attention of Brent McCurdy, Director of Corporate Affairs, at the following address:
  Alcohol and Gaming Commission of Ontario
  90 Sheppard Avenue East, Suite 200
  Toronto, Ontario  M2N 0A4

The AGCO will also be holding in-person discussions with businesses, agencies and stakeholders to canvass these opportunities for reform and implementation details on a more in-depth basis.

Please note that participant information collected as part of this consultation will not be made publicly available, except as may be required by the Freedom of Information and Protection of Privacy Act, but the AGCO may publicly release a summary of submissions received. Individuals and organizations may, however, make their own comments and submissions available to the public.
1. Supporting Business, Protecting the Public Interest

“Open for Business” in Ontario

Across Ontario, every sector of the economy has confronted challenges in recent years. Among these challenges is an increase in the day-to-day cost of running a business and a shift in Ontario’s competitiveness.

To address these challenges, the government has been working with employers in Ontario to create better government-to-business services, while maintaining effective regulatory oversight. Most notably, the government launched “Open for Business”, a plan to build a more modern, results-driven regulatory environment and develop a more open and responsive working relationship between government and business.

In fulfilling its mandate, the Alcohol and Gaming Commission of Ontario (AGCO) is committed to doing its part to help reduce administrative burden and costs for businesses in the beverage alcohol sector and to support a more competitive economic climate for Ontario’s liquor manufacturing and distribution sectors. Our top priority will always be protection of the public interest, which means we will continually work to maintain safe, livable communities and strenghthen Ontario’s business environment in support of new investment and innovation.

Ontario’s Growing Wine, Beer and Spirits Industry

Ontario’s wine, beer and spirits industries are thriving because of the individuals and businesses that are dedicating their entrepreneurial talent to support continued development and growth of top quality Ontario products for domestic and international markets. Despite a challenging economic environment in recent years, Ontario’s wineries, breweries, and distilleries have taken risks, made investments, grown their businesses, and created jobs.

For example, the number of manufacturers’ licences for grape and fruit wine producers has increased from just a handful two decades ago to over 220 today. New licences continue to be issued every year. Today, the wine industry generates annual sales in the hundreds of millions of dollars, provides jobs for Ontario workers and attracts tourists to our province from around the world.

Ontario’s brewery sector is likewise experiencing a proliferation of new business start-ups. Over the past decade, there has been a sharp increase in the number of breweries in the province, which are contributing to the sector’s overall growth and paying wages to Ontario workers.

Ontario’s distillery industry also continues to occupy an important position in the provincial economy. Ontario’s distilleries generate jobs across the province and purchase large volumes of Ontario-produced grain and agricultural inputs every year.

The economic foundation of Ontario’s beverage alcohol sector is strong. Entrepreneurs in the local wine, beer, and spirits industries have demonstrated that they are committed to growing their businesses and are ready to take advantage of new opportunities in the global economy. At the AGCO, we are similarly ready to focus our efforts on modernizing our policies to better protect the public interest by fostering an even more favourable environment for growth while maintaining effective regulatory oversight.
Modernizing the Regulation of Ontario’s Liquor Industry

In recent years, the government has taken a series of important steps to modernize the regulation of Ontario’s beverage alcohol industry. By implementing government initiatives and closely collaborating with government, business and social responsibility groups, the AGCO’s new regulatory approach is showing positive results.

For example, in 2007, the government made a series of reforms to reduce the regulatory burden on licensed establishments and permit the AGCO to better target licensing- and enforcement-related resources on high-risk businesses. A few short years later, liquor violations in Ontario are down dramatically and the administrative burden on bars, restaurants and other licensed establishments is reduced. More recently, in 2011, the AGCO implemented changes to eliminate unnecessary barriers for special events, festivals and licensed establishments, while updating and strengthening the enforcement tools available to law enforcement.

Now, the AGCO is embarking on the next stage of regulatory modernization in Ontario’s beverage alcohol industry. Through this consultation, we intend to identify ways to create a smarter, faster and more focused regulatory environment for Ontario’s liquor manufacturing and distribution sectors. We want to work with you to identify new opportunities for the AGCO to modernize its policies to reduce the administrative burden, enhance opportunities for Ontario-based businesses, simplify regulatory rules, and promote compliance with Ontario’s liquor laws and policies.
2. Reducing the Administrative Burden

Licence Rationalization for Wine, Beer, and Spirits Manufacturers

Currently, manufacturers of wine, beer and spirits in Ontario are eligible to obtain a variety of licences and authorizations from the AGCO to run different parts of their business. The range of licences and authorizations include manufacturers’ licences, retail store authorizations, liquor sales licences (“tied houses”), and limited liquor sales licences (“by the glass”).

Manufacturers have told us that the existing requirement to obtain multiple approvals from the AGCO to run different parts of their business – and the different rules, renewal periods and requirements – cause unnecessary expense and operational difficulties. For instance, at a number of Ontario wineries and breweries today, the existing licensing regime prevents a customer from taking a drink purchased in one licenced area (i.e. a by the glass beverage) to another licenced area on the same premises (i.e. a tied house).

While today’s system of licences and authorizations has been created over the years with the intention of increasing business opportunities for manufacturers, we have heard that each well-intentioned and beneficial change has contributed to an increasingly complex and layered system.

Consultation Questions

Q1. What steps could the AGCO take to better consolidate manufacturers’ licences and synchronize renewal periods?

Q2. What challenges could consolidation efforts face and/or what areas should remain separate?

Use of Risk-Based Principles in the Licensing Process

In recent years, the AGCO has been shifting to a regulatory approach that focuses less on prescriptive rules and more on the identification and management of risk and the promotion of compliance by licensees. This new “risk-based” model is intended to provide flexibility in business operations, while encouraging good business practices among licensees and allowing the AGCO to focus its resources where they will have the greatest impact.

For instance, the AGCO’s risk-based licensing regime for liquor sales licensees (i.e. bars, clubs, restaurants, etc.) is working to minimize prescriptive rules and focus on identifying the risks posed by individual licensees, applicants and their premises. Further, the risk-based licensing regime seeks to mitigate those risks, when necessary, by imposing conditions and/or requiring licensees or applicants to submit certain types of risk mitigation plans. Because conditions can be imposed on higher risk licences, the rules for the vast majority of the industry are increasingly becoming less prescriptive.

While a legislative amendment would likely be required to permit risk-based licensing in most of the licence types being considered in this review, the AGCO could incorporate aspects of its risk-based approach through amendments to its policies and procedures. Risk principles could, for instance, be incorporated into the licence application and renewal processes. Streamlined processes could be developed for those applicants with minimal risk factors, especially for licence renewals. For example, if a
Licensee’s business has not changed over the licence period, there have been no changes in the licensee’s ownership structure and no licence infractions have been incurred, the renewal process could consist of a written assurance that no material changes in the business have occurred since the last application/renewal.

Consultation Questions
Q3. In your view, how could the AGCO’s application and renewal processes be streamlined?
Q4. What specific areas of licensing would most benefit from the adoption of risk-based principles?

Streamlining of Audits

Currently in Ontario, various types of liquor licensees are subject to annual audits by multiple government agencies and organizations to ensure compliance with regulatory requirements in such areas as provincial and federal taxation, alcohol content and quality, retail sales, and inventory.

In the wine sector, for example, several different agencies and organizations collect audit-related information from wineries each year, including the AGCO, the LCBO, the Ontario Ministry of Finance, the Canada Revenue Agency and the Vintners Quality Alliance of Ontario (VQAO). While the LCBO conducts audits on behalf of the AGCO and the VQAO, the majority of these audits and inspections are generally conducted separately by each individual organization.

Representatives from the liquor manufacturing industry have told us that there are opportunities to better rationalize and streamline the multiple audit and inspection requirements for manufacturers and other licensees.

Consultation Questions
Q5. What current audit and inspections requirements falling under the jurisdiction of the AGCO can be rationalized or eliminated?
Q6. From your perspective, are there opportunities to coordinate audits across the various organizations?
3. Removing Barriers to Job Creation and Economic Growth

Modernizing Retail Store Authorizations

In Ontario, the majority of wineries, breweries, and distilleries are authorized to operate “on-site retail stores” at which manufacturers are able to offer their products for sale to the public. Additionally, several of Ontario’s wine manufacturers are permitted to sell their wines at off-site winery retail stores across Ontario.

In 2001, the responsibility for authorizing and regulating manufacturer retail stores was transferred from the LCBO to the AGCO. At the time, the AGCO adopted existing LCBO policies governing the eligibility and operation of manufacturer retail stores, including rules governing the sale of non-liquor products (“ancillary items”) at stores. While a number of piecemeal changes have been made to the AGCO’s manufacturer retail store policies over the years, a comprehensive review of the policies has not taken place since they were transferred from the LCBO over a decade ago.

The AGCO has heard from manufacturers and stakeholders across the industry that a number of these long-standing manufacturer retail store policies currently work in a way that impedes innovative retail opportunities and limits flexibility in business operations. While cognizant of the policy constraints and limitations that flow from Canada’s trade obligations, industry representatives have told us that some of the current rules have created unnecessary barriers to business growth and job creation and should be modified where permissible.

A summary of the relevant policies governing the operation of manufacturer retail stores are provided in the appendices to this Consultation Paper.

Consultation Questions

Q7. How could the AGCO’s retail store policies be amended in order to remove barriers to job creation and economic growth, while continuing to protect public safety and respecting trade obligations?
Q8. How could the AGCO establish greater consistency and simplicity between and within its winery, brewery and distillery retail store policies?
Q9. What role should the AGCO play with respect to “ancillary items” going forward?

Updating the Advertising Rules for Manufacturers, Manufacturers’ Representatives, Liquor Delivery Services and Ferment-on-Premise Operators

Under Ontario’s Liquor Licence Act, certain classes of liquor licensees are permitted to advertise in accordance with criteria that are set out in law and related AGCO Advertising Guidelines. These advertising rules are primarily focused on protecting the public from advertising practices that are contrary to the public interest, such as those that directly or indirectly promote underage drinking.

The regulations provide different rules for two groups of licensees and there are separate AGCO Advertising Guidelines for each group. Ferment-on-premise operators, liquor delivery services and special occasion permit holders are permitted to advertise in
a limited fashion without prior approval from the AGCO, but must obtain prior approval from the Registrar for most advertising activities. On the other hand, liquor sales licensees (i.e. bars, clubs and restaurants), manufacturers and manufacturers’ representatives do not need prior approval from the AGCO to advertise, but must follow the rules set by the regulations and Advertising Guidelines.

In addition, the Advertising Guidelines pertaining to liquor sales licensees, manufacturers and manufacturers’ representatives establish special rules regarding “promotional activities” and “manufacturers’ inducements”. For example, beverage alcohol manufacturers in Ontario are not permitted to offer a gift unless it has a value of no more than 20% of the retail value of the drink with which it is included, up to a maximum of $5.00. In addition, the rules prohibit manufacturers from providing liquor sales licensees with an extensive list of “items” that are currently characterized in Ontario as constituting “financial or material inducements”.

Several industry stakeholders have suggested that the AGCO should review the current system of regulating manufacturers’ promotions and inducements.


Consultation Questions

Q10. How, if at all, could the advertising rules for ferment-on-premise operators, liquor delivery services operators and manufacturers be changed?
Q11. Should the manufacturers’ promotion rules be changed? If so, how?
Q12. In your view, how could the Advertising Guidelines’ current restrictions on inducements by manufacturers be updated?
Q13. In your view, how should the Advertising Guidelines be enforced?

Updating the Sampling Guidelines for Manufacturers and Manufacturers’ Representatives

The AGCO is responsible for administering rules regarding the offering of drink samples by manufacturers and manufacturers’ representatives for promotional or other purposes. The AGCO’s Sampling Guidelines for Liquor Manufacturers set out rules that permit, in limited circumstances, manufacturers and manufacturers’ representatives to provide samples to patrons of manufacturers’ retail stores, licensed establishments (i.e. bars, clubs and restaurants) and in other circumstances.

These guidelines have been updated from time to time, but a full-scale review with a view to providing greater clarity and better targeting of the risks associated with sampling activities has not been undertaken.

Some stakeholders have indicated that there are a number of overly prescriptive and inconsistent rules in the Sampling Guidelines that should be reviewed. For example, some have questioned whether it continues to make sense that a “closed sample” of a beverage alcohol product, such as a packaged single container of beer, can be provided on the street as part of a
promotional campaign, but cannot be provided in a retail store setting.

The AGCO’s sampling guidelines for manufacturers and manufacturers’ representatives can be reviewed at http://www.agco.on.ca/pdfs/en/guides/1224_a.pdf.

**Consultation Questions**

Q14. What amendments could be made to the AGCO’s Sampling Guidelines to support greater flexibility for your business, while ensuring the public interest is protected?

**Supporting New Start-Ups in the Beverage Alcohol Industry**

In recent years, a number of entrepreneurs have entered the Ontario beverage alcohol manufacturing industry by means of unique contractual relationships with well-established licensed manufacturers. Most commonly, start-up businesses are entering into agreements with licensed manufacturers to either oversee production while contracting out the production process to the licensed manufacturer or, alternatively, to rent space and equipment in the experienced manufacturer’s production facility so that the start-up business can directly undertake the production process. The start-up business’s products are then marketed and sold under a different brand than the licensed manufacturer, sometimes under a separate manufacturer’s licence.

These contractual relationships are typically attractive to entrepreneurs with limited resources to invest in the significant start-up capital required to open a full-fledged manufacturing facility. Through this model, start-ups can refine their product and develop a customer base before investing in capital equipment and facilities.

**Consultation Questions**

Q15. In your view, how could the AGCO better support businesses in Ontario’s beverage alcohol industry that opt to produce their products in conjunction with other licensed manufacturers?
4. Creating a Safe, Fair and Competitive Regulatory Environment

In addition to the specific consultation items discussed in the preceding sections, the AGCO is interested in receiving your ideas and viewpoints on other opportunities to create an even safer, fairer and more competitive regulatory environment for Ontario’s beverage alcohol industry and to enhance Ontario-based business and trade opportunities.

Each of the consultation items identified in this paper result from feedback and advice that has been provided to the AGCO from manufacturers, partner agencies and other industry stakeholders. We recognize, however, that there are additional regulatory issues and ideas that, if acted upon, could serve to support economic growth and development at Ontario’s liquor manufacturing and delivery sectors.

The AGCO and its partner agencies have heard concerns and received advice in several areas not expressly discussed in this consultation paper, including the enforcement of minimum and uniform pricing of retail liquor and oversight of beer delivery to liquor sales licensees.

Consultation Question

Q16. What other specific opportunities exist to improve the regulatory environment for wine, beer and spirits manufacturers, liquor delivery services, manufacturer’s representatives, and ferment-on-premise operators?
Appendix 1

On-site Winery Retail Store Policies

1. The winery must have a valid manufacturer’s licence issued by the Registrar.
2. Must be located on the same parcel of land as the winery’s production site.
3. On-site winery retail stores must be located on a parcel of land with at least 5-acres of planted fruit.
4. 100% of total grape wine production from grapes grown within Ontario.
5. All wine made available for sale in the winery retail store must be Ontario wine.
6. The wine to be sold in the store must be made by the winery at that production site.
7. Only one on-site retail store authorization may be issued per licensed winery.
8. Wineries located outside of Designated Viticultural Areas (DVAs) must produce at least 50% of its total wine production from grapes grown within the boundaries of its territorial division.
9. Permitted to open Monday to Sunday 9am to 11pm.
10. Any store being relocated must be open and operational in the new location within 6 months. In some circumstances, both the old and new retail store locations may be open concurrently for a period of up to 7 days.
11. Permitted to deliver to individuals/the public without charging a delivery fee. Permitted to deliver to individuals/the public via third party common carrier.
12. For fruit wineries:
   » The winery must produce a minimum of 80% of its total wine production from fruit (not including grapes).
   » If the winery produces apple wine, it must make each of its brands of such wine from at least 70% Ontario apples or the concentrated juice thereof.
   » If the applicant produces wine from fruit other than grapes or apples, it must make each of its brands of such wine from 100% Ontario fruit or the concentrated juice thereof.
13. For honey wineries,
   » The winery must own/lease and operate a minimum of 100 bee colonies and possess at all times, a valid Beekeepers Certificate of Registration issued by the Provincial Apiarist under the Bees Act.
Appendix 2

Off-site Winery Retail Store Policies

1. The winery must have a valid manufacturer's licence issued by the Registrar.
2. The wine to be sold in the store must be made by the winery.
3. Manufacturer must have continually held a manufacturer’s licence since before 1993.
4. Any store being relocated must be open and operational in the new location within 6 months.
5. Monday to Saturday 9am to 11pm, Sunday 11am to 6pm.
6. Cannot open on New Year’s Day, Good Friday, Easter Sunday or Christmas Day.
Appendix 3

Winery Retail Stores Gift or Souvenir Packages

Subject to the approval of the Registrar, a manufacturer of Ontario wine (as defined under the *Liquor Licence Act*) may sell Ontario wine made by other manufacturers of Ontario wine as part of a gift or souvenir package. Requests for approval must be made in writing to the Registrar. The Registrar’s decision to grant or deny approval is made subject to the following terms and conditions:

1. Only one type of gift or souvenir package may be sold in all of the manufacturer’s retail stores at any given time.
2. In addition to the manufacturer’s own wine, the gift or souvenir package may contain wine made by no more than two (2) other Ontario wine manufacturers.
3. The gift or souvenir package shall contain no more than two (2) bottles of each of the other Ontario wine manufacturers’ wines, and each bottle shall contain no more than 1.5 litres.
4. The volume of each of the other manufacturer’s wines may not exceed the volume of the manufacturer’s own wine.
5. The gift or souvenir package may contain no more than four (4) bottles of wine and at no time may the total volume of the gift pack exceed six (6) litres.
6. The Ontario wine made by the other manufacturer(s) must be 100% Ontario wine in accordance with the definition of Ontario wine under the *Liquor Licence Act*.
7. The gift or souvenir package must contain wine made by the manufacturer selling the package and such wine must have been made in accordance with the *Wine Content and Labeling Act*.
8. The gift or souvenir package must be marketed, assembled, displayed, priced and sold as a single selling unit.
9. The manufacturer shall notify the Registrar in writing when it ceases to sell the approved gift pack. On receipt of such notice by the Registrar, the manufacturer’s approval to sell the gift pack shall become void.
Appendix 4

Distillery Retail Store Policies

1. The distillery must have a valid manufacturer’s licence issued by the Registrar.
2. Must be located on the same parcel of land as the distillery’s production site.
3. Only one on-site retail store authorization may be issued per licensed distillery.
4. Any spirits and/or spirit products which are sold in the distillery retail store must be brands which are owned by the distillery that holds the distillery retail store authorization.
5. Must have a minimum batch still capacity of 5,000 litres, or a minimum continuous still capacity of 150 litres per hour of absolute alcohol at their production site.
6. Must make a minimum of 50% of the volume of spirits and/or spirit products to be sold in the distillery retail store on an annual basis at the production site. The remaining 50% of the volume of spirits and/or spirit products to be sold in the distillery retail store must be distilled, blended, aged or bottled by the distillery at the production site.
7. Must enter into an agreement with the LCBO respecting the sale of its products to the LCBO and the subsequent sale of such products to the public on behalf of the LCBO.
8. Permitted to open Monday to Sunday 9am to 11pm.
9. Any store being relocated must be open and operational in the new location within 6 months. In some circumstances, both the old and new retail store locations may be open concurrently for a period of up to 7 days.
10. Permitted to deliver to individuals/the public without charging a delivery fee.
Appendix 5

Brewery Retail Store Policies

1. The brewery must have a valid manufacturer’s licence issued by the Registrar.
2. May only sell beer made by the brewery.
3. If the brewery produces less than 25,000 hectolitres of beer per year:
   » It is eligible to apply for one on-site brewery retail store; and
   » All products sold at the brewery retail store must be made by the manufacturer at the production site
     where the brewery retail store is located.
4. If the brewery produces 25,000 hectolitres of beer or more per year:
   » It is eligible to apply for authorization to operate two brewery retail stores, provided that each brewery
     retail store is located at a production site of the brewery; and
   » At least 50% of the beer sold in each store must be made by the brewery at the site of the retail store
     where it is being sold.
5. Where the brewery operates one on-site brewery retail store, the store must be located on the same parcel
   of land as the applicant’s main production site where the full brewing process takes place.
6. Where the brewery operates two on-site brewery retail stores:
   » One store must be located on the same premises as the applicant’s main production site where the full
     brewing process takes place; and
   » The second must be located at another production site of the applicant where the full brewing process
     takes place.
7. The applicant must make all of its products in Ontario using the full brewing process.
8. Permitted to open Monday to Sunday 9am to 11pm.
9. Permitted to deliver to individuals/the public without charging a delivery fee.

1 The full brewing process includes, without limitation, mashing, lautering, boiling, hop separation, fermentation and packaging.
Appendix 6

Manufacturer Retail Store Permitted Ancillary Items

Winery retail stores are permitted to sell:

1. Wine glasses, carafes and decanters;
2. Wine-related accessories such as cork-screws, stoppers, wine racks, ice buckets;
3. Gift-bags, boxes and baskets;
4. Carrier bags (recyclable/reusable) which may or may not display the manufacturer’s corporate logo/name or product identity;
5. Books on wine and wine-related recipe books;
6. Clothing which displays corporate logo/name or product identity such as baseball caps, hats, T-shirts, sweat tops and pants;
7. Cooler bags, umbrellas and other items which display corporate logo/name or product identity;
8. Gift certificates; and
9. Other items approved in writing by the Registrar.

Distillery retail stores are permitted to sell:

1. Glasses and decanters;
2. Accessories such as ice buckets;
3. Gift bags, boxes and baskets;
4. Carrier bags (recyclable/reusable) which may or may not display the manufacturer’s corporate logo/name or product identity;
5. Books on spirits and spirit-related recipe books;
6. Clothing which displays the manufacturer’s corporate name/logo or product identity such as baseball caps, hats, t-shirts, sweat tops and pants;
7. Accessories which display the manufacturer’s corporate name/logo or product identity such as umbrellas;
8. Gift certificates; and
9. Other items approved in writing by the Registrar.

Brewery retail stores are permitted to sell:

1. Beer glasses and steins;
2. Beer-related accessories, e.g., bottle openers, stoppers, ice buckets, cooler cups;
3. Gift bags, boxes and baskets;
4. Carrier bags (recyclable/reusable) which may or may not display the manufacturer’s corporate logo/name or product identity;

5. Books on beer and beer-related recipe books;

6. Clothing which displays the manufacturer’s corporate logo/name or product identity such as baseball caps, hats, T-shirts, sweat tops and pants;

7. Cooler bags, umbrellas and other items which display manufacturer's corporate logo/name or product identity;

8. Gift Certificates; and

9. Other items approved in writing by the Registrar.
Appendix 7

The Beer Store Ancillary Items

The Beer Store is also permitted to sell:

1. Shirts
2. Sweaters
3. Tank Tops
4. Shorts
5. Pants
6. Caps/Hats
7. Visors
8. Jackets
9. Vests
10. Slippers
11. Sandals
12. Night Shirts
13. Glasses
14. Steins/Mugs
15. Bar Ware
16. Aprons
17. Cups
18. Draught Supplies
19. Coolers
20. Beverage Holders
21. Flashlights
22. Car Sunshades
23. Ice
24. Reusable Ice
25. Sunglasses
26. Belts
27. Ties (Formerly Salt and Pepper Sets)
28. Suspenders
29. Earrings
30. Lighters
31. Playing Cards
32. Key Chains/ FOBS
33. Umbrellas
34. Signs
35. Clocks
36. Towels
37. Bags
38. Posters
39. Maps (Formerly Patio Lights)