

Memorandum

To: IBWA Bottler Members and Candidate Bottlers
From: Bob Hirst - Vice President, Education, Science, and Technical Relations
Claire Crane – Program Coordinator
Date: December, 2014
Re: 2015 IBWA Bottled Water Facility Inspections

The International Bottled Water Association's 2015 annual plant inspection program is about to begin. The program is designed to assist you in determining how well your bottling operation complies with all applicable federal and state regulations, as well as IBWA Bottled Water Code of Practice requirements for bottled water production and sale. Once again in 2015, annual plant inspections are based on conformance with your plant's HACCP plan as well as FDA- and IBWA-mandated good manufacturing practices (GMP) requirements. Details are provided later in this memorandum.

IMPORTANT: PLEASE READ THIS MEMORANDUM CAREFULLY AND COMPLETELY. THERE IS NEW INFORMATION YOU NEED TO KNOW ABOUT NEW AUDIT CONTRACTORS. IT IS ALSO CRITICAL THAT YOU COMPLETE AND FORWARD A BOTTLER INFORMATION FORM (BIF) OR CANDIDATE BOTTLER INFORMATION FORM (CBIF) FOR EVERY PLANT YOU OPERATE. SOME MEMBERS WHO DID NOT SUBMIT THEM IN 2014 PAID FOR A SECOND INSPECTION DUE TO UNKNOWN PLANT CLOSURES, UNREPORTED CHANGES IN PERSONNEL, AND THE AUDIT COMPANY'S INABILITY TO REACH THE PROPER COMPANY REPRESENTATIVE FOR THE 2-DAY ADVANCE NOTICE. BIFs AND CBIFs ARE DUE AT IBWA BY JANUARY 31, 2015.

ACTION NEEDED:

Please complete the attached two-page 2015 Bottler Information Form (BIF) or Candidate Bottler Information Form (CBIF) for every plant to be scheduled for a Tier 1 inspection and fax them to Claire Crane at IBWA at (703) 683-4074, or email scanned copies to Claire at ccrane@bottledwater.org. To facilitate the scheduling of your Tier 1 inspection, **it is advisable to return this form to IBWA before January 31, 2015.** If you operate more than one bottling facility, please duplicate the form and return ONE FORM FOR EACH PLANT. If a form is not received for each plant, the audit contractor may not be able to schedule the necessary inspections in 2015.

IMPORTANT NOTES:

1. Your annual IBWA dues do not cover the base inspection fee provided in the inspection contracts. You must add the applicable inspection fee(s) to your dues payment.
2. Your annual inspection fee covers ONE TRIP to your facility by the audit company. The fee does NOT cover the cost of a second visit to your facility(ies) if the first inspection is canceled. Members are billable for a rescheduled inspection, and will incur another audit fee plus the auditors' travel expenses for subsequent visits after a canceled audit.

SIGNIFICANT CHANGES TO 2015 INSPECTION PROGRAM

At the time of writing, IBWA staff was in negotiations with three (3) audit companies to provide Tier 1 audit services to IBWA member and candidates facilities: EAGLE Certification Group, Eurofins Scientific, Inc., and NSF International. EAGLE and Eurofins have been offered 3-year term contracts for January 1, 2015 through December 31, 2017. Due to performance issues, the IBWA Audit Program Evaluation Team, IBWA Technical Committee, and IBWA Board of Directors approved NSF for a 1-year probationary contract, with an option for a 2-year extension pending performance improvements in 2015. See page 4 for contract 2015 audit fees for each of the 3 companies.

Once again in 2015, IBWA staff is tasked with monitoring member facilities that fail their annual audit for 2 or more consecutive years. In summary, the IBWA bylaws provide for the following:

1. If a member facility has passed the two previous inspections, but fails the current year inspection, current protocols for filing a corrective action plan with the audit contractor shall be followed. The audit contractor shall notify IBWA staff only of the facility's failure and the acceptability of its corrective action.
2. Six (6) months following the initial notice of deficiency(ies), the audit company will verify that corrective action(s) have been fully implemented. Verification will be in the form of a records review (documents, photographs, equipment receipts, etc.). If at that time the member facility has not implemented corrective action(s) and the cited deficiency(ies) continue to exist, or the facility continues to be out of compliance with FDA regulations and/or their in-house HACCP plan, the audit contractor shall notify IBWA staff of such failure, and shall provide IBWA with details of the deficiency(ies) and any corrective action information submitted by the member facility to the audit contractor. IBWA shall place the member facility in a probationary status until such time as corrective action(s) is(are) fully implemented and verified by the audit contractor, once again by a records review as described above. Staff shall coordinate with the audit contractor to provide any needed assistance to the member facility to help bring the facility back into compliance.
3. If a member facility fails the annual inspection for a second consecutive year, the audit contractor shall notify IBWA staff of such failure, and shall provide IBWA with details of the items failed and any corrective action submitted by the member facility to the audit contractor. The President shall then inform the Executive Committee of the facility's repeated inspection failures, with a recommendation to act on the facility's IBWA membership status until such time as the facility is again audited by an IBWA-approved audit company and the audit company reports that the facility is in full compliance with FDA and IBWA standards and requirements, as required by the existing IBWA bylaws.

Please be advised that this program is intended to HELP a member facility to return to full compliance with FDA regulations, IBWA's Code of Practice, and the facility's HACCP plan.

Next, although not yet implemented at the beginning of the year in 2015, FDA's implementation of the **Food Safety Modernization Act** through publication of proposed rules in 2013 and beyond will have some impact on IBWA's inspection program. The first rules, including one on preventive measures (HACCP and CGMPs), were published in 2013, and a supplemental proposed rule was published in September, 2014. Once the final rules become available, IBWA staff and the Audit Program Evaluation Team (APET) will review them and modify the IBWA audit checklist, Audit Handbook, and Plant Technical Reference Manual as necessary. The proposed rule for preventive controls incorporates updated rules for current Good Manufacturing Practices (CGMPs). These too will be incorporated into IBWA's inspection checklist and handbook. We anticipate the final rule's impacts on the IBWA inspection program to begin with the 2016 or 2017 inspection year.

- Perhaps the single most significant change that is already effective under FSMA is fees that allow FDA to charge food processors for re-inspection of facilities that are found to be deficient during the routine first inspection. IBWA has investigated the impact of those fees on bottled water companies and advises members that they can be substantial. For example, IBWA has estimated that a single re-inspection of a bottled water plant may cost that plant's owners in excess of \$20,000, including permitted charges for travel expenses and an hourly rate of \$221 for every FDA full time employee involved in the re-inspection. FDA could send as many as 3 to 5 employees for the re-inspection. In addition, if the deficiency is serious, warranting a recall of product, FDA is now permitted to charge fees associated with their costs incurred in recalling the product.

How can a member avoid these significant new fees? IBWA urges members to do the following:

1. Educate yourself about FSMA and its potential impacts on your business. IBWA provides articles in the Bottled Water Reporter and the weekly News Splash. We also present live seminars at state/regional association meetings, standalone seminars around the country, and at our annual business conference in November. Seminars on FSMA will continue to be presented in 2015.
2. Conduct SELF AUDITS of your facility(ies) on a regular basis. Making self audits a part of your routine quality assurance program help assure that when the FDA or state inspectors come through your door, you have already found and mitigated any serious deficiencies. IBWA's Audit Handbook and our audit checklists (found in the appendix section of the handbook) are available to you. If you do not have a copy, contact Claire Crane at ccrane@bottledwater.org for a copy.

IBWA entered into two new contracts for Tier 1 audit services beginning January 1, 2015 for a term of three years. We are also contracting on a probationary basis with NSF International for one year, pending a performance review in late-2015. 2015 is the first year of the new contract term. The three companies providing annual audit services in 2015 are EAGLE Certification Group, Eurofins Scientific, Inc., and NSF International. See Appendix C in this document for more information about each company.

Please be advised of a continuation in 2015 of a change in policy regarding submission of bottler information forms, aka "BIFs." In the past (prior to 2011), IBWA refrained from authorizing an audit until we received a completed BIF form from each facility to be audited, even if we had received payment for the audit from the bottler member. However, we had significant difficulties obtaining these forms from many facilities. The lack of a BIF form to serve as IBWA's authorization for the audit often resulted in audits not being completed, completed very late in the year, or spilling over into the next audit year. Beginning in 2011, IBWA used receipt of payment for the audit as full authorization to proceed with the annual audit(s) of your plants. We still request that each facility submit a BIF to make the process most accommodating to all, but in the absence of a BIF after 30 days of receipt of payment, will be considered authorization by the member for the plant audit. Of course, if you wish to block certain dates due to construction activity or other plant shutdowns, please continue to complete the BIF and note such on the form, and submit to IBWA as soon as possible. As always, we will pass that information on to the audit contractor.

In 2010, IBWA introduced a new two-tier inspection program that continues with the traditional inspection program that you have known, now called **TIER 1**. The addition to the program, called **TIER 2**, is open to any IBWA member bottler who achieves certification under a Global Food Safety Initiative (GFSI) certification program, such as Safe Quality Food (SQF) or British Retailers Consortium (BRC). IBWA has screened GFSI audit service companies and has approved nine of them for IBWA Tier 2 audits:

AIB International

Bureau Veritas Certification North America, Inc.

EAGLE Certification Group

Eurofins Scientific, Inc.

Intertek

NSF International

Silliker Global Certification Services Pty Ltd

Societe Generale de Surveillance (SGS)

Steritech

More information regarding these companies, including contact information, is provided on page 10 of this document. Please be aware that these companies have agreed to incorporate IBWA's audit requirements into their GFSI-based audits, and therefore are the only companies that may be used for Tier 2 audits.

Tier 1 Inspections

As discussed above, IBWA is contracting with three (3) audit services companies in 2015. During this new contract, IBWA bottler members and candidate bottlers may select EAGLE Certification Group, Eurofins Scientific, Inc., or NSF International

(NSF) for Tier 1 inspections. If a member company has multiple facilities, they may select any of the three vendors for each of those facilities. In addition, if a bottler decides to change vendors each year, they are free to do so. Bottlers will select their inspection vendor(s) at the time they renew their memberships for 2015. The vendor selection will be included on the renewal form and the bottler information form (BIF).

The membership renewal form accommodates all three vendors. Once again with membership renewals in 2015, the IBWA dues amount is separate from the cost of the inspection.

TIER 1 INSPECTION FEES FOR 2015

The inspection fees, payable by members to IBWA and, in turn, paid by IBWA directly to the inspection vendors, are as follows:

EAGLE Certification Group	\$1,500.00
Eurofins Scientific, Inc.	\$1,400.00
NSF International:	\$1,795.00

NOTE: The amount above is for the annual inspection ONLY. Membership dues will be IN ADDITION TO the above amounts.

These are prices for Tier 1 inspections only. Tier 2 audit costs are negotiated directly by the member company with the Tier 2 audit provider. Please contact that provider for a cost estimate. If you have any questions, please contact Bob Hirst (bhirst@bottledwater.org) or Claire Crane (ccrane@bottledwater.org).

IMPORTANT: Space is provided on the first page of the BIF to indicate events that could affect scheduling of the 2015 inspection. Please note that an inspection may be conducted during these periods if bottling operations are still occurring.

THE IBWA HACCP INSPECTION PROGRAM

The International Bottled Water Association (IBWA) requires, as a condition of membership, that bottlers submit to an annual inspection of their facilities. Since 1984, the annual inspection has focused on requirements of 21 CFR Parts 110, 129, and 165 as well as the IBWA Bottled Water Code of Practice ("Model Code"). The inspections have been conducted by a third party organization contracted by IBWA. The primary purpose for the annual inspections has been to verify compliance with GMP and other requirements specified in the above regulations. Beginning in 2002, the Hazard Analysis and Critical Control Point (HACCP) approach to food safety was implemented by IBWA, and annual inspections now include a review of each member company's HACCP program, as well as GMP compliance. IBWA's voluntary implementation of HACCP in the bottled water industry is based partially on HACCP regulatory requirements set by the Codex Alimentarius Commission, the U.S. Department of Agriculture and FDA.

THE IBWA AUDIT HANDBOOK (TIER 1 ONLY)

A Tier 1 inspection handbook was prepared for you, the IBWA member, to assist you in preparing for your plant's annual HACCP inspection. IBWA has also provided the handbook to its inspection contractors to assist them in interpreting FDA and IBWA requirements and their application to bottled water facilities. The handbook also serves to provide you with the means to conduct self inspections, an important part of any plant's HACCP program. Self inspections help prepare you and your facility for inspections by IBWA's contractor as well as government representatives. As new FSMA rules are finalized, the handbook and audit checklists will be updated.

When IBWA's inspectors note nonconformances (previously known as "deficiencies") during your inspection, you should implement any necessary corrective action to return your plant into conformance/compliance with your HACCP plan and any applicable regulatory requirements.

Preparing for an Inspection

As was mentioned earlier, the best method to prepare for any HACCP inspection is to conduct a series of self inspections of your facility(ies). Meet with your quality assurance and production staffs and with your HACCP team on a regular basis. It is important, whenever feasible, to prepare more than one individual in the company for the inspection. If, when the

inspector arrives, no one is available to work with the inspector, and the inspector is turned away at the door, it may be a costly error as your company will be charged for any rescheduled inspections. It is critically important to train two or more company employees in handling the inspection, including the HACCP plan and location of all supporting records that will be requested during the inspection.

All materials necessary to conduct your own self inspection are included in this handbook, including an inspection checklist, item-by-item discussion, and applicable regulations.

Tier 1 Inspection Program Administration

The inspection is designed to be carried out in a constructive, consultative manner. *This is not a regulatory inspection*; the inspector is not authorized to shut down your operations. However, if a serious food safety or operational matter is brought to your attention during or after the inspection, you should take immediate steps to correct the nonconformance(s).

The inspection checklist form (copy included in the *IBWA Audit Handbook*) includes approximately 90 items. Of those 90 items, 26 are directly linked to your HACCP program; 16 are linked to HACCP-related GMPs; 43 are GMP requirements as mandated by FDA and IBWA; and 5 are requirements for membership in IBWA.

The inspector will generally start with a review of your plant's HACCP plan. He/she will usually tour the plant to verify the process flow diagram, then return to an office area to continue review of the HACCP plan and associated records. Upon completion of the plan and record review, the inspector will proceed into the plant to verify information presented in the HACCP plan and to conduct the GMP portion of the inspection. When completed, the inspector will return to the office for report generation and debriefing with the plant representatives.

The inspector should encourage you to ask questions during the inspection. Don't be afraid to ask questions; remember, this is a constructive, consultative event! You should take your own notes during the inspection, including the inspector's suggestions and recommendations as well as issues that you may wish to discuss during the debriefing. If you have any questions that cannot be answered by the inspector, you should contact IBWA's Vice President of Education, Science, and Technical Relations at (703) 647-4611 for assistance. Issues that require further consideration may be referred to the IBWA Audit Program Evaluation Team (APET).

After the inspection is completed, the inspector will conduct a debriefing session. At that time, a list of nonconformances will be provided to the plant's representatives. The inspector will provide Corrective Action Report (CAR) forms with a brief explanation of each nonconformance and space for the company's root cause analysis and corrective action. The company has up to ten (10) business days to complete the forms and submit them to the audit contractor to comply with the terms of the inspection program.

There are two types of nonconformances employed in the IBWA inspection program:

HACCP, GMP, and IBWA Membership Major Nonconformances

Major nonconformances (Mj) are generally equivalent to "critical deficiencies" under the former GMP inspection program. IBWA and its third party inspection contractor have determined that these items are directly related to compliance with your HACCP plan or to food safety. Items cited as "Mj" must be corrected as soon as possible. The plant is required to perform a root cause analysis of the problem and record the results of that analysis on the Corrective and Preventive Action Report form (CAR-1) provided by the inspector. When the root cause is determined, the plant is required to BRIEFLY, but as specifically as possible, explain on the form what corrective action has been, or will be, implemented. Mail or fax a copy of the CAR-1 form to **the audit contractor** within 10 business days after the date of the plant inspection.

HACCP and GMP Minor Nonconformances

Minor nonconformances (Mn) are generally other GMP and administrative items for which corrective action is necessary. Corrective action for items cited as "Mn" are not required to be reported to the audit services company.

While HACCP inspections are intended to focus on more of a "black and white" approach to "conformance" or "nonconformance" with a plant's HACCP plan and GMPs, every effort will be made to accommodate concerns over variability in interpretation of the requirements. However, that accommodation will be focused more on the IBWA Audit Program Evaluation Team (APET), whose function it is to rule on areas of dispute. APET will generally concentrate on issues

that affect the industry as opposed to rulings on individual plant matters. For example, APET is more likely to become involved in rulings on where weekly source samples may be collected rather than the condition of a source water tanker at a specific facility.

As has been the case since 2005, IBWA's technical staff no longer receives your plant's audit report or other materials, such as annual water quality analysis reports and labels. The IBWA Board of Directors established this policy as a means of protecting the privacy of your audit reports. If, however, you wish IBWA staff to be involved in a discussion of your report, you may, at your option, forward a copy of your report to staff. In addition, a formal procedure for appealing audit findings reported by the auditors has been established and published. A copy of that procedure follows this memorandum. In brief, the procedure provides a pathway for IBWA members to appeal audit findings directly to the audit contractor – another means of protecting private information. If a satisfactory resolution to your appeal is not achieved, you may then contact Bob Hirst or Claire Crane at IBWA to appeal the finding through the IBWA Audit Program Evaluation Team (APET). APET is charged with overseeing the audit contract and resolving any "gray areas" or other audit program issues.

IBWA HACCP inspection reports are not assigned a numerical score. Rather, they are evaluated on the basis of "conformance" or "nonconformance" with the plant's HACCP plan and regulatory GMPs. However, IBWA employs a system that continues to recognize plants that demonstrate "Excellence in Manufacturing" and acknowledges those who are in compliance with GMP requirements and their HACCP plans. In order to qualify for certificates, the following guidelines have been established:

Excellence in Manufacturing

If a plant's inspection findings exhibit no major nonconformances and three (3) or fewer minor nonconformances, the plant will be awarded a certificate for "Excellence in Manufacturing." A list of all plants awarded the certificate will be published at the end of each inspection year.

Certificate of Compliance

If a plant's inspection findings exhibit no major nonconformances and from four (4) to ten (10) minor nonconformances, the plant will be awarded a "Certificate of Compliance." The certificate acknowledges that the plant is in compliance with its HACCP plan. A list of all plants awarded the certificate will be published at the end of each inspection year.

If you have any questions regarding the BIF form, the inspection program, regulatory compliance, or HACCP, please contact Claire Crane or Bob Hirst at (703) 683-5213. We look forward to another successful year of inspections in 2015!

APPENDIX A
INTERNATIONAL BOTTLED WATER ASSOCIATION
POLICY AND PROCEDURE
IBWA BOTTLED WATER PLANT INSPECTION PROGRAM
APPEAL OF INSPECTION FINDINGS

OBJECTIVE

The IBWA Bottled Water Plant Inspection Program was established to provide consultative services to IBWA member bottled water plants. It is also a requirement of IBWA membership that each domestic member plant be inspected by IBWA's third party inspection contractors, and that direct international bottler members be inspected annually by an IBWA-approved inspection agency. On occasion, a member plant may wish to appeal one or more of the inspector's findings. Through this policy and procedure, IBWA is establishing a structured and standardized means for appealing those inspection findings.

POLICY

It is the policy of the International Bottled Water Association that all U.S domestic and direct international bottler members participate in the annual Bottled Water Plant Inspection Program. IBWA understands that there are occasions when a bottler disagrees with an inspector's finding(s). IBWA contracts with an independent, third party inspection agency to provide inspections services of IBWA's member plants. It is therefore NOT the policy of IBWA to "reverse" inspection findings and modify inspection reports. IBWA will serve as an arbiter in some cases to assist in resolving conflicts between the member and the inspection agency. In most cases, it is preferred that the member consult directly with the inspection agency to resolve conflicts.

Some conflicts lead to appeals of inspection findings. To provide members a means for appealing those findings, IBWA is establishing a formal process, described in the following sections.

PROCEDURE FOR U.S. DOMESTIC BOTTLERS

When a U.S. domestic bottler member disagrees with an inspection finding, the first course of action should be to complete and submit an inspection appeal form directly to the audit contractor. The contractor will in turn consult with the inspector who conducted the inspection and filed the disputed finding(s).

In the event that the conflict cannot be resolved, the bottler may appeal the finding(s) to IBWA. This can be accomplished by sending a copy of the inspection appeal form (copy attached to this policy and procedure document) providing details about the disputed inspection item, and submitting it to designated IBWA technical staff. Upon receipt, IBWA's technical staff will review the appeal. Staff will first review the IBWA *Inspection Handbook* to determine if there is an applicable ruling on the situation surrounding the appealed inspection item. This will include review of any gray areas ruled upon by the IBWA Inspection Program Evaluation Team (APET). If the appealed item has already been addressed by the *Inspection Handbook* or APET, the bottler will be notified in writing of that ruling. If the appealed item has NOT been addressed previously by the Inspection Handbook or APET, the bottler will be notified that the appeal is being forwarded to the third party agency and APET for review, consideration and possible ruling. These types of appeals are commonly referred to as "gray area" items. IBWA technical staff will distribute the appeal to all members of APET, with all identification of the member bottler removed, with a request that they return their opinions on the matter. In many cases, IBWA technical staff and APET members will schedule a conference call to discuss groups of appeals. Such conference calls may also involve a representative of the third party, independent inspection agency. Upon receiving a ruling from APET, IBWA technical staff will notify the bottler. If corrective action is required to correct any major nonconformances, staff will request such from the bottler.

When an appeal results in a change in an inspection report, audit contractor staff will issue a revised inspection report. The corrected report will be sent directly to the bottler by the contractor.

It is the intent of this policy to address all appeals expeditiously. Therefore, once filed with the audit contractor, the contractor will have 10 business days to review the appeal and respond to the bottler with a finding. When the appeal is filed with IBWA's technical staff, they will distribute the appeal anonymously to APET. APET will have 10 business days from the date of receipt of the appeal by IBWA's staff to review the appeal and respond to IBWA technical staff with a ruling on the issue. APET's rulings will require a minimum of 4 votes for approval. IBWA staff will respond to the bottler with the final APET ruling no later than 30 days after the date the bottler's appeal was filed.

DIRECT INTERNATIONAL BOTTLER MEMBERS

The same policy and procedure applies to direct international member plants. However, when reviewed by APET, they will take into consideration any local regulations that may have led to the nonconformance being cited by the inspector. When completing an appeal form or submitting the appeal on company letterhead, direct international bottler members are requested to submit evidence of such local regulations with the appeal form.

Document prepared by: Bob Hirst, IBWA

Document reviewed by: Bob Hirst, IBWA

IBWA Audit Program Evaluation Team

NSF International

Date: January 26, 2004

Revision 6.0, December 6, 2007

IBWA BOTTLED WATER PLANT INSPECTION PROGRAM

Appeal of Inspection Findings

Name: _____ Company: _____

Plant Location: City: _____ State: _____

Inspection Date: __/__/__ Inspector Name: _____

Inspection Agency/Company: _____

Inspection Form Item No. Appealed: _____

Inspector's Comments: _____

Reason for Appeal: _____

Inspection Form Item No. Appealed: _____

Inspector's Comments: _____

Reason for Appeal: _____

APPENDIX B

2015 IBWA TIER 2 AUDIT PROGRAM LIST OF IBWA-APPROVED TIER 2 AUDIT PROVIDERS

AIB International
1213 Bakers Way
Manhattan, KS 66505
Phone: (785) 537-4750
auditservices@aibonline.org
www.aibonline.org

Mr. Tony Petrucci
Food Business Development Manager
Bureau Veritas Certification North America, Inc.
390 Benmar Drive, Suite 100
Houston, TX 77060
Phone: (215) 432-1182
tony.petrucci@us.bureauveritas.com
www.us.bureauveritas.com/wps/wcm/connect/bv_usnew/Local/Footer/Home/

Mr. Ben Marchant
EAGLE Certification Group
123 Webster St., Suite 300
Dayton, OH 45402
800.795.3641 or 937.293.2000 | fax 937.293.0220
benjamin.marchant@eaglecertificationgroup.com
www.eaglecertificationgroup.com

Ms. Crista Righi, Operations Manager
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US Food Division
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CristaRighi@eurofinsus.com
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Ms. Jacqueline Polacek
Intertek
134 N. LaSalle St.
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Phone: (630) 209-3258
audit.americas@intertek.com
www.intertek.com

Mr. Robert Prevendar, Global Managing Director, Supply Chain Food Safety
NSF International
P.O. Box 130140
789 N. Dixboro Road
Ann Arbor, MI 48113-0140, USA
Tel: 734-769-5362
prevendar@nsf.org
www.nsf.org

Ms. Dianne West
Silliker Global Certification Services Pty Ltd
900 Maple Road Homewood, IL 60430
Phone: (708) 957-7878
dianne.west@silliker.com
<http://www.merieuxnutrisciences.com/us/eng/silliker>

Mr. Mark Evers
SGS Systems & Services Certification (SSC)
Business Development Manager, Northeast Region
SGS U.S. Testing Company, Inc.
Meadows Office Complex, 201 Route 17 North
Rutherford, NJ 07070
Phone: 201.508.3011
Cell: 201.400.6048
Fax: 201.935.4555 or 201.508.3191
Email: mark.evers@sgs.com

Ms. Beth Cannon
Director of Certification Services
Steritech Group
7600 Little Avenue
Charlotte, NC 28226
Phone: 704.544.1900
www.steritech.com

APPENDIX C

***IBWA 2015 TIER 1 AUDIT CONTRACTORS
COMPANY INFORMATION***

SERVICES FOR IBWA MEMBERS

For every company, managing risks in the fields of quality, health, & safety are vital.

Eurofins, with years of experience in the water industry, is proud to partner with IBWA in offering Tier 1 and Tier 2 audits to their members. Eurofins has a diverse and expanded range of services including certifications, training, and analytical laboratory testing that will help you and your organization meet the growing requirements and face the food safety challenges in every day operation.

An audit with Eurofins verifies and validates that your food safety protocols are in compliance with market regulations, maximizes efficiencies, and promotes process optimization while minimizing risks for product recalls and food safety issues.

■ **FAIR & CONSISTENT AUDITS**

Our employed auditors are masters of their discipline, calibrated monthly, and trained to ensure you experience a fair, thorough, and consistent service that exceeds your quality expectations.

■ **EXPERTS IN WATER INDUSTRY**

Our technical team and auditors understand the water industry, inside and out, adding value to your company's investment with the IBWA program.

■ **COMPETITIVE PRICE**

Our goal is to provide quality service at a price that is cost-effective to you and your company.

■ **FULL SERVICE PROVIDER**

Save money and time through the convenience of dealing with one provider for testing, training, auditing, and certification.

■ **GLOBAL NETWORK**

Our global reach can help you navigate seamlessly through a dynamic and ever-changing worldwide market.

■ **PERSONALIZED CUSTOMER ATTENTION**

For a seamless transition, our personable and knowledgeable staff connect with you to ensure you receive the utmost qualitative care and information you need to be successful.

A decision to partner with Eurofins is a decision to demonstrate your commitment to high standards and product excellence and provides you with peace of mind through our value-added services and highly skilled industry experts. Expect the best!



Founded in 1994, EAGLE is an accredited certification body providing third-party audits against a wide range of ISO, GFSI and other industry specific standards. We employ over 100 auditors working with thousands of clients. Our commitment to helping clients improve productivity and reduce risk is the core of our business philosophy.

With EAGLE you get more than auditing services. Our clients benefit from personalized service with one point of contact to ensure familiarity with their business and provide a consistent audit schedule. Our number one objective is to add value to the audit through constructive feedback and opportunities for improvement.

EAGLE auditors know the specific requirements of the food and beverage industry. We draw our auditors from this industry and the team dedicated to the bottled water industry will be familiar to many of you.

Their expertise includes the requirements of GMP, GHP, HACCP and the CODEX Alimentarius as it applies to the bottled water industry. In addition, EAGLE has extensive knowledge of the public health impacts of bottling plant design, construction, operations, water treatment, bottling and packaging equipment, analytical requirements and the IBWA model code.

To strengthen the competency of our auditors, EAGLE conducts six annual calibration training sessions. This aligns all of our auditors' interpretation and offers our clients consistency with audit findings and outcomes. These calibrations are where innovation is fostered and new ideas are tested and challenged. Plus, every auditor is required to participate in competency training focusing on four key areas to ensure the audit is objective, complete and valuable. These areas include customer service, dependability and reliability, technical work effectiveness and work effectiveness.

EAGLE Certification Group includes EAGLE Registrations Inc. and EAGLE Food Registrations Inc.

EAGLE Certification Group

123 Webster Street, Suite 300 | Dayton, OH 45402 | 937.293.2000 | 800.795.3641 | 937.293.0220 fax
info@eaglecertificationgroup.com | www.eaglecertificationgroup.com

NSF INTERNATIONAL

For more than 30 years, NSF and IBWA have been partners in helping to make the IBWA Plant Inspection Program a key influencer in assuring the high quality of bottled water produced by members and in setting the bar for other associations around the world. We look forward to continuing to play a key role in the program. Our experience in the bottled water industry in the U.S. and worldwide results in unmatched expertise in bottled water facilities, equipment, processes and sanitation.

Water is one of NSF's core businesses. As a not-for-profit third party and high profile member of the public health community, NSF has developed public standards, worked with the U.S. Food and Drug Administration on food and water safety, and serves as a Pan American Health Organization/World Health Organization Collaborating Center on Food Safety, Water Quality and Indoor Environment. We believe NSF offers the IBWA Audit Program added credibility and public acceptance.

In addition to the Tier 1 inspection program, NSF is also approved to offer the Tier 2 inspection for any IBWA members who wishes to have their plant inspection done in conjunction with their GFSI (Global Food Safety Initiative) certification scheme.

Auditor Qualification and Training

NSF auditors have food safety, environmental health or science backgrounds with specific training to perform bottled water inspections. The auditors share more than 350 years of professional experience and have performed thousands of bottled water audits.

NSF Accreditations

NSF's many accreditations include:

- Product certification: ISO 17065 from ANSI (American National Standards Institute)
- SQF and BRC from ANSI
- ISO 9001, ISO 14001 & FSSC 22000 from ANAB (ANSI-ASQ National Accreditation Board)
- Laboratory certifications: ISO/IEC 17025, NELAC and NELAP

NSF Online

NSF Online is a secure, Web-based management portal that enables clients to manage their audits, test reports, corrective actions and accounting information, while also providing valuable business intelligence and trend analysis data.

NSF Training and Education

As public health and safety standards evolve around the world, companies must make sure their employees receive essential education and training to stay ahead of the curve. NSF International understands the challenges businesses face, and provides timely and pertinent public health training and instruction for the global food industry at all levels to achieve positive results. Please go to www.nsf.org for more information.

NSF Support

NSF has designated key contacts for the IBWA Audit Program:

- Myla Estacio, Technical Manager, Beverage Quality (T: 1-734-913-5738 / E: mestacio@nsf.org)
- Anna Ciechanowski, Senior Project Manager, Beverage Quality – (T: 1-734-827-5623 / E: aciechanowski@nsf.org)
- Valbona Malo, Business Unit Manager, Beverage Quality (T: 1-734-769-8010 / E: malo@nsf.org)

APPENDIX D

2015 IBWA BOTTLER INFORMATION FORM 2015 IBWA CANDIDATE BOTTLER INFORMATION FORM

Please complete the attached two-page 2015 Bottler Information Form (BIF) or Candidate Bottler Information Form (CBIF) for every plant to be inspected and fax them to [Claire Crane](mailto:ccrane@bottledwater.org) at IBWA at (703) 683-4074, or email scanned copies to Claire at ccrane@bottledwater.org. To facilitate the scheduling of your inspection, **it is advisable to return this form to IBWA before January 31, 2015**. If you operate more than one bottling facility, please duplicate the form and return ONE FORM FOR EACH PLANT. If a form is not received for each plant, the audit contractor may not be able to schedule the necessary inspections in 2015. Please note also that inspection fees may be based on the date the BIF/CBIF is received by them.

IMPORTANT NOTES:

1. Your annual IBWA dues do not cover the base inspection fee provided in the inspection contracts. You must add the applicable inspection fee(s) to your dues payment.
2. Your annual inspection fee covers ONE TRIP to your facility by the audit company. The fee does NOT cover the cost of a second visit to your facility(ies) if the first inspection is canceled. Members are billable for a rescheduled inspection, and will incur another audit fee plus the auditors' travel expenses for subsequent visits after a canceled audit.

2015 IBWA BOTTLER INFORMATION FORM

Please complete the following form and return it to IBWA **by January 31, 2015**. This information will be used to update our records and schedule your facility for a 2015 plant inspection. **Complete one form, including Parts I-IV for each bottling plant.** Thank you for your immediate attention.

PART I. Please fill in the blanks with the correct information.

COMPANY NAME: _____

USPS STREET ADDRESS OF PLANT: _____ (Not a P.O. Box)

PHYSICAL ADDRESS OF PLANT: _____

CITY, STATE, ZIP: _____

TELEPHONE NUMBER: _____

PLANT CONTACT PERSON & EMAIL ADDRESS: _____

ALTERNATE CONTACT PERSON & EMAIL ADDRESS: _____

DAYS AND TIME BOTTLING IS PERFORMED: _____

(please specify)

TYPE OF INSPECTION IN 2015:

___ **IBWA TIER 1** (Standard IBWA Inspection) ___

Please select one Tier 1 audit contractor: EAGLE Certification Group ___ Eurofins Scientific Inc. ___ NSF International ___

___ **IBWA TIER 2** (GFSI-based audit with completed IBWA checklist) ___

IBWA-approved audit company selected for Tier 2 audit: _____

COMPLETE THE FOLLOWING FOR IBWA TIER 1 INSPECTIONS ONLY!

1. Do you anticipate any major plant renovation or equipment changes in your plant which would impact the timing of an inspection in 2015?

Yes No

If yes, please give approximate date(s). _____

****NOTE:** If there is a change in the above date(s), you must notify IBWA immediately. **

2. Please give nature of renovations and/or equipment change below:

Plant Construction Equipment Installation

Plant Relocation Other _____

PART II. For source waters, please check the applicable treatment methods. If your answer is not listed, write in your answer in the space marked "other". See key below for codes.

SOURCE WATER	TREATMENT METHODS									
	AC	DI	DE	OZ	ME	RO	UV	AE	MI	Other (Specify)
SPRING										
ARTESIAN WELL										
WELL										
MUNICIPAL SYSTEM										
*OTHER										
*(SPECIFY OTHER SOURCE TYPE) _____										
For spring source, check method of collection.										
Borehole _____ Collection Box _____ Other _____										

KEY:AC=Activated Carbon; DI=Distillation; DE=Deionization; OZ=Ozonation; ME=Mechanical Filtration; RO=Reverse Osmosis; UV=Ultra Violet; AE=Aeration; MI=Micron Filtration

PART III. Check finished product disinfection method.

FINISHED PRODUCT	DISINFECTION		
	OZ	UV	OTHER (specify)
SPRING WATER			
ARTESAN WELL WATER			
PURIFIED WATER			
PURIFIED WATER WITH MINERALS ADDED			
OTHER: _____			

PART IV. Check product container size and type used for packaging.

PACKAGE SIZE	TYPE OF PACKAGE				
	POLYCARBONATE	PET	HDPE	GLASS	OTHER (specify)
5 GALLON					
3 GALLON					
2 1/2 GALLON					
1 GALLON					
1/2 GALLON					
20-25 OZ					
16.9 OZ (0.5 LITER)					
12 OZ					
8 OZ					
OTHER: _____					

2015 IBWA CANDIDATE BOTTLER INFORMATION FORM

Please complete the following form and return it to IBWA **by January 31, 2015**. This information will be used to update our records and schedule your facility for a 2015 plant inspection. **Complete one form, including Parts I-IV for each bottling plant.** Thank you for your immediate attention.

PART I. Please fill in the blanks with the correct information.

COMPANY NAME: _____

USPS STREET ADDRESS OF PLANT: _____ (Not a P.O. Box)

PHYSICAL ADDRESS OF PLANT: _____

CITY, STATE, ZIP: _____

TELEPHONE NUMBER: _____

PLANT CONTACT PERSON & EMAIL ADDRESS: _____

ALTERNATE CONTACT PERSON & EMAIL ADDRESS: _____

DAYS AND TIME BOTTLING IS PERFORMED: _____ (please specify)

PLEASE SELECT ONE CANDIDATE AUDIT CONTRACTOR:

EAGLE Certification Group ___ **Eurofins Scientific Inc.** ___ **NSF International** ___

COMPLETE THE FOLLOWING FOR IBWA TIER 1 INSPECTIONS ONLY!

1. Do you anticipate any major plant renovation or equipment changes in your plant which would impact the timing of an inspection in 2015?

Yes

No

If yes, please give approximate date(s). _____

****NOTE: If there is a change in the above date(s), you must notify IBWA immediately.****

2. Please give nature of renovations and/or equipment change below:

Plant Construction Equipment Installation

Plant Relocation Other _____

PART II. For source waters, please check the applicable treatment methods. If your answer is not listed, write in your answer in the space marked "other". See key below for codes.

SOURCE WATER	TREATMENT METHODS									
	AC	DI	DE	OZ	ME	RO	UV	AE	MI	Other (Specify)
SPRING										
ARTESIAN WELL										
WELL										
MUNICIPAL SYSTEM										
*OTHER										
*(SPECIFY OTHER SOURCE TYPE) _____										
For spring source, check method of collection.										
Borehole _____ Collection Box _____ Other _____										

KEY:AC=Activated Carbon; DI=Distillation; DE=Deionization; OZ=Ozonation; ME=Mechanical Filtration; RO=Reverse Osmosis; UV=Ultra Violet; AE=Aeration; MI=Micron Filtration

PART III. Check finished product disinfection method.

FINISHED PRODUCT	DISINFECTION		
	OZ	UV	OTHER (specify)
SPRING WATER			
ARTESAN WELL WATER			
PURIFIED WATER			
PURIFIED WATER WITH MINERALS ADDED			
OTHER: _____			

PART IV. Check product container size and type used for packaging.

PACKAGE SIZE	TYPE OF PACKAGE				
	POLYCARBONATE	PET	HDPE	GLASS	OTHER (specify)
5 GALLON					
3 GALLON					
2 1/2 GALLON					
1 GALLON					
1/2 GALLON					
20-25 OZ					
16.9 OZ (0.5 LITER)					
12 OZ					
8 OZ					
OTHER: _____					