



**INDIANA ENVIRONMENTAL STEWARDSHIP PROGRAM
ANNUAL PERFORMANCE REPORT**

State Form 53475 (R3 / 1-11)
INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
ENVIRONMENTAL STEWARDSHIP PROGRAM

Indiana Department of Environmental Management
Office of Pollution Prevention and Technical Assistance
MC 64-00, Room IGCS W041
100 North Senate Avenue
Indianapolis, IN 46204-2251
Telephone: (800) 988-7901
FAX: (317) 233-5627
E-mail: esp@idem.IN.gov

Please use this form if you are a member of the Indiana Environmental Stewardship Program (ESP) to report on progress toward objectives and targets AND certify ESP requirements continue to be achieved. Indiana ESP facilities must submit an Annual Performance Report (APR) by April 1st of every year, for each calendar year in which the entity has been a member for at least three (3) full months. Section C of your APR should be signed by your ISO 14001:2004 EMS Lead Auditor. Your APR should be reviewed and signed by a senior manager at your facility prior to submittal. Once signed, e-mail the APR to IDEM at esp@idem.IN.gov. Please do not include any confidential business information in your annual performance report. Public access laws require IDEM to make the APR publicly available, which may include posting all portions of your report on the Indiana ESP Web site. If you have any questions, please contact IDEM at esp@idem.IN.gov or (800) 988-7901.

SECTION A FACILITY INFORMATION

Name of facility
Baxter Pharmaceutical Solutions LLC

Name of parent company (if applicable)
Baxter Healthcare

Street address (number and street)
927 South Curry Pike

City / State / ZIP code
Bloomington, IN 47403

Web site of Facility/Company
www.baxter.com

CONTACT INFORMATION

Name of Contact (Mr. / Mrs. / Ms. / Dr.)
Mr. Terry Heilman

Title
EHS Manager

Telephone number
812-355-5257

FAX number
812-355-2970

E-mail address
terry_heilman@baxter.com

Mailing address (if different from facility address)

City / State / ZIP Code

REPORTING PERIOD

Reporting period dates (month, day, year)
2012

1a. Is this the third Annual Performance Report of your membership term?
 Yes—If yes, answer question 1b.
 No—If no, skip to the "Change in Information" section of this report.

1b. Do you wish to renew your Indiana Environmental Stewardship Program membership?
 Yes—If yes, please complete all sections of this annual report.
 No—If no, please complete all sections of this annual report except for Section F.

CHANGE IN INFORMATION

In your ESP application and, perhaps, in previous annual performance reports, you described what your facility does or makes. Have there been any changes or additions to your facility's list of products or activities?
 Yes—If yes, please describe them:
 No

SECTION B PUBLIC OUTREACH AND PERFORMANCE REPORTING

Why do we need this information?
IDEM needs to know how environmental information was shared with the public.

What do you need to do?
Describe how the facility has shared and plans to share environmental information.

Please briefly describe the activities that your facility conducted during this reporting period to interact with the community on environmental issues and to report publicly on its environmental performance. **Green County Soil & Water Conservation-Financial contribution to assist getting 319 grant.**

Please indicate which of the following methods your facility plans to use to make its ESP Annual Performance Report available to the public. Please check as many as appropriate.
 Web site (<http://www.sustainability.baxter.com>) Open house Meetings Press releases Other Baxter Corporate Sustainability

SECTION C

ENVIRONMENTAL MANAGEMENT SYSTEM ASSESSMENT

Why do we need this information?

Facilities need to have implemented an EMS that meets certain criteria and use an ISO 14001:2004 EMS Lead Auditor at least every 36 months to assess the EMS.

What do you need to do?

Answer the following questions about your EMS.

1. What is the most recent date that an ISO 14001:2004 EMS Lead Auditor performed an EMS assessment at your facility? 4/30-5/3/2012

2. Is the date of the most recent EMS assessment performed by an ISO 14001:2004 EMS Lead Auditor within the past 36 months?

Yes—If yes, skip to Question 3.

No—If no, please have your ISO 14001:2004 EMS Lead Auditor complete and sign the following checklist, indicating whether or not your EMS meets the listed criteria for ESP membership:

Yes No Evidence of senior management support, commitment, and approval.

Yes No A written environmental policy directed toward compliance, pollution prevention, and continuous improvement.

Yes No Identification of the environmental aspects at the entity.

Yes No Prioritization of the environmental aspects and a determination of those aspects deemed significant considering, at the minimum, environmental impacts and applicable laws and regulations.

Yes No Established priorities, and environmental objectives and targets for continuous improvement in environmental performance and for ensuring compliance with applicable environmental laws, regulations, and permit conditions. Objectives and targets must go beyond current legal requirements and specify the environmental media, types of pollution to be prevented or reduced, implementation activities, and projected time frames.

Yes No An established community outreach mechanism that includes identifying and responding to community concerns; informing the community of important matters that affect the community; and reporting on the EMS, including reporting to the public on the environmental policy and significant aspects.

Yes No Incorporation of environmental and pollution prevention planning in the development of new products, processes, and services and modifications of existing processes.

Yes No Evidence of clear responsibility for implementation, training, monitoring, EMS maintenance, taking corrective action, and ensuring compliance with applicable environmental laws, regulations, and permit conditions.

Yes No Documentation of the implementation procedures and the results of implementation.

Yes No Appropriate written EMS procedures.

Yes No An annual evaluation of the EMS with written results provided to senior management and affected employees.

*** SEE ATTACHED BAXTER GROUP CERTIFICATE INCLUDING BLOOMINGTON, CLOSING PRESENTATION WITH AUDIT TEAM MEMBERS, AND**

SLIDE THAT THE FACILITY REMAINS IN GOOD STANDING.

Signature of ISO 14001:2004 EMS Lead Auditor

Date (month, day, year)

3. Were any deficiencies found during the most recent EMS assessment?

No—If no, skip to Question 4.

Yes—If yes, describe any deficiencies found and the corrective action taken to address each deficiency:

4. Name, title, and organization of ISO 14001:2004 EMS Lead Auditor that conducted the most recent EMS assessment: ERM CVS

5. What type of protocol was used to perform the independent EMS assessment?

ISO 14001:2004 Certified audit

Responsible Care EMS audit

Responsible Care 14001 audit

ESP Independent Assessment Protocol

Other (please specify):

6. Is the EMS certified to a recognized standard?

Yes—If yes, what standard does the EMS follow (please provide a copy of the most recent certificate)?

ISO 14001:2004

Responsible Care EMS

Responsible Care 14001

No.

7. When was the last Senior Management review of your EMS completed?

Month / Year: December 2012

Who headed the review (name and title)? Sjoerd "Hank" Osinga, Director of Engineering

8. When did your facility last conduct an internal or corporate environmental compliance audit? Do not include inspections or site visits by regulatory organizations.
 Scope of the compliance audit: Compliance and ISO/OHSAS Standards
 Month(s) / Year(s): May 2012
 Who conducted the audit(s) (e.g., facility staff, corporate, third party)? Corporate & Third Party

9. Explain the emergencies experienced within the facility during the past year. Were the applicable emergency and contingency plans detailed in the EMS effective? What changes, if any, have been made to your facility's emergency or contingency plans?
 None

10. Has your facility corrected all instances of potential environmental non-compliance and EMS non-conformance identified during your audits and other assessments?
 Yes—If yes, briefly summarize corrective actions taken and other improvements made as a result of your EMS assessment(s) or compliance audit(s).
All basic issues were fully addressed and closed. The audit identified a need to strengthen the safety culture, which has begun.
 No—If no, please explain your plans to correct these instances. No such instances identified.

11. (Optional) Please provide a narrative summary of progress made toward EMS objectives and targets other than those reported as an Environmental Performance Initiative in Section E. You may limit the summary to environmental aspects that are significant and towards which progress has been made during the last calendar year. Attach additional sheets as necessary.

Environmental aspect	Progress made this year (e.g., quantitative or qualitative improvements, activities conducted)

SECTION D ADDITIONAL INFORMATION

Why do we need this information?
 This information will help IDEM to effectively manage the Environmental Stewardship Program.

What do you need to do?
 Answer the questions as completely as possible.

1. In addition to ESP, please list environmental awards received or voluntary programs participated in during the past twelve months.
 N/A

2. Has your facility taken advantage of any ESP incentives? If so, please describe the implementation process and list additional benefits IDEM should consider.
 N/A

3. If your facility was not registered to the ISO 14001 standard prior to becoming an ESP member, has ESP helped you to pursue registration? If so, how has ESP been instrumental in achieving registration?
 N/A

SECTION E ENVIRONMENTAL IMPROVEMENT INITIATIVE RESULTS

Why do we need this information?
 Facilities need to share the results of the environmental improvement initiative that was pursued during the reporting period.

What do you need to do?
 Summarize your facility's progress on achieving the initiative you identified in the application or last year's APR.

Category: <u>Energy</u>	Baseline Quantity	Future Goal Quantity	Current Quantity	Cost Savings
Indicator: <u>KWH/MUOP</u>				
Calendar year	2011	2012	2012	
Actual quantity (per year)	34,064,119	33,042,200	33,159,281	
Normalized quantity (per year)	289,905 KWH/MUOP	281,208 KWH/MUOP	335,536 KWH/MUOP	
Basis for your normalizing factor (e.g., gallons of paint produced)	Million Units of Production - vials, syringes, cartridges			
Measurement unit (e.g., pounds)	Kilowatt Hours			
Briefly describe how you achieved improvements for this environmental initiative or, if relevant, any circumstances that delayed progress. <u>Variation in production demand significantly impacted energy usage in the Q4 2012 and continued into Q1 2013.</u>				
Please list any state, U.S. EPA, or other partnership programs to which you are reporting this data (e.g., Energy Star, Project XL). <u>N/A</u>				
(Optional) If your facility has experienced continued results for environmental improvement initiatives pursued in past years of ESP membership, please share those results here. <u>N/A</u>				

SECTION F

ENVIRONMENTAL IMPROVEMENT INITIATIVE

Why do we need this information?

Facilities need to show they are committed to improving their environmental performance.

What do you need to do?

Refer to the Environmental Performance Table and answer the following questions.

1. Select the appropriate boxes in the following table to indicate the **category** and **indicator(s)** that represents the environmental improvement initiative selected by your facility. For the category and indicator selected, list the **baseline year** (e.g., 2009) and the **future year** (e.g., 2010). Next, list the **baseline annual quantity** (e.g., 5 tons) and **future annual quantity** (e.g., 2 tons) you are committing to achieve by the end of the future year.

Category	Indicator	Baseline Year 20__12__	Future Year 20__13__	Unit
<input type="checkbox"/> Material Procurement	<input type="checkbox"/> Recycled content			Pounds, tons
	<input type="checkbox"/> Hazardous/toxic components			Pounds, tons
<input type="checkbox"/> Suppliers' Environmental Performance	<input type="checkbox"/> Specify indicator: _____			As specified for the particular indicator
	<input type="checkbox"/> Materials used			Pounds, tons
<input type="checkbox"/> Material Use	<input type="checkbox"/> Hazardous materials used			Pounds, tons
	<input type="checkbox"/> Ozone depleting substances used			CFC-11 equivalent pounds
	<input type="checkbox"/> Total packaging materials used			Pounds, tons
	<input checked="" type="checkbox"/> Water Use	<input checked="" type="checkbox"/> Total water used	59,490 KGAL	59,359 KGAL
<input type="checkbox"/> Energy Use	<input type="checkbox"/> Electricity			kWh / MWh, Btu / MMBtu
	<input type="checkbox"/> Steam			kWh / MWh, gallons, ft ³
	<input type="checkbox"/> Natural gas			Btu / MMBtu
	<input type="checkbox"/> Diesel			Gallons
	<input type="checkbox"/> Propane / LPG			Btu / MMBtu, gallons
	<input type="checkbox"/> Gasoline			Gallons
	<input type="checkbox"/> Solar			kWh / MWh
	<input type="checkbox"/> Wind			kWh / MWh
	<input type="checkbox"/> Landfill gas			Btu / MMBtu
	<input type="checkbox"/> Combined heat and power			kWh / MWh, Btu / MMBtu
	<input type="checkbox"/> Other: _____			_____
<input type="checkbox"/> Land and Habitat	<input type="checkbox"/> Land and habitat conservation			Square feet, acres
	<input type="checkbox"/> Community land revitalization			Square feet, acres
<input type="checkbox"/> Air Emissions	<input type="checkbox"/> Total GHGs			MTCO ₂ E
	<input type="checkbox"/> VOCs			Pounds, tons
	<input type="checkbox"/> NO _x , SO _x , PM _{2.5} , PM ₁₀ , or CO			Pounds, tons
	<input type="checkbox"/> Air toxics			Pounds, tons
	<input type="checkbox"/> Odor			European Odour Units
	<input type="checkbox"/> Radiation			Curies, Becquerels
	<input type="checkbox"/> Dust			Pounds, tons
<input type="checkbox"/> Discharges to Water	<input type="checkbox"/> COD or BOD			Pounds, tons
	<input type="checkbox"/> Toxics			Pounds, tons
	<input type="checkbox"/> Total suspended solids			Pounds, tons
	<input type="checkbox"/> Nutrients			Pounds, tons of N or P
	<input type="checkbox"/> Sediment from runoff			Pounds, tons
	<input type="checkbox"/> Pathogens			MPN/ml, CFU/ml
<input type="checkbox"/> Non-hazardous Waste <input type="checkbox"/> Hazardous Waste	<input type="checkbox"/> Landfill			Pounds, tons
	<input type="checkbox"/> Incineration			Pounds, tons
	<input type="checkbox"/> Reused/recycled off-site			Pounds, tons, gallons
	<input type="checkbox"/> Other: _____			Pounds, tons, gallons
<input type="checkbox"/> Noise	<input type="checkbox"/> Noise			dBA
<input type="checkbox"/> Vibration	<input type="checkbox"/> Vibration			Inches per second
<input type="checkbox"/> Products	<input type="checkbox"/> Expected lifetime energy use			kWh / MWh, Btu / MMBtu
	<input type="checkbox"/> Expected lifetime water use			Gallons
	<input type="checkbox"/> Expected lifetime waste to air, water, or land from product use			Pounds, tons
	<input type="checkbox"/> Waste to air, water, or land from disposal or recovery			Pounds, tons

2. What activities or process changes do you plan to undertake at your facility to accomplish your initiative (e.g., technology changes in a particular process line, employee training)? Reduction in flushing activities by upgrade of control systems
3. Does this initiative address a significant aspect in your EMS?
 Yes
 No—If no, please explain why you believe this indicator should be included as an environmental improvement initiative:

CERTIFICATION AND PLEDGE

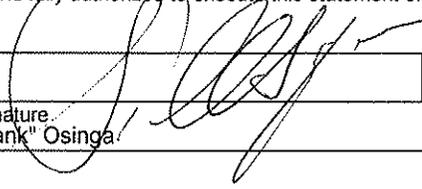
On behalf of (name of facility) Baxter Pharmaceutical solutions LLC

I certify that the information contained in this Annual Performance Report and attachments is accurate to the best of my knowledge and that this facility is, to the best of my knowledge and based on reasonable inquiry, currently in compliance with all applicable federal, state, and local environmental requirements, or has a corrective action program in place to attain compliance.

We, Baxter Pharmaceutical Solutions LLC, commit to maintaining the principles and goals outlined in our Environmental Management System for our facility's Indiana Environmental Stewardship Program status. We agree to strive for full compliance with all regulations promulgated by the U.S. EPA, state, or local jurisdictions. We agree to promote the Indiana Environmental Stewardship Program and to share our success stories with other facilities. We understand that the Annual Performance Report must be submitted to IDEM by April 1st of each year and that we must reapply to the Indiana Environmental Stewardship Program every three years.

I understand that the information provided in this Annual Performance Report will be public record. I am the senior facility manager or authorized facility signatory, and fully authorized to execute this statement on behalf of the corporation or other legal entity whose facility is submitting this Annual Performance Report.

Signature



Title
Director of Engineering

Date (month, day, year)
3/29/2013

Printed signature
Sjoerd "Hank" Osinga

ISO 14001

Certificate of Registration

ERM Certification and
Verification Services

2nd Floor
Exchequer Court
33 St. Mary Axe
London EC3A 8AA
Tel: +44 (0)20 3206 5281
Fax: +44 (0)20 3206 5442
Email post@ermcvs.com

This is to certify that

Baxter International Inc.

ERM CVS

located at

*Corporate Headquarters: One Baxter Parkway
Deerfield, Illinois 60015-4633*

Certificate Number: 326
Initial Issue Date: 04 August 2005
Reissue Date: 7 March 2012
Revision Date: 29 November 2012
Expiry Date: 3 August 2014
Version #:25
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has been registered to ISO 14001:2004 for

*Manufacturing, research and development of medical products and
associated administration, warehouse and distribution activities
(specific locations covered under this certificate are listed
on the attached addendum)*



This certificate is the property of ERM
Certification and Verification Services
Ltd and is issued subject to ERM CVS's
Standard Terms and Condition of
Business. Its validity may be confirmed
by contacting ERM CVS as set out
above.

Signed on behalf of ERM CVS by:

Leigh Lloyd
Managing Director

ERM CVS is an independent member of
the world-wide Environmental
Resources Management Group of
Companies

Scope: Manufacturing of medical, biotech and pharmaceutical products			
Road 721, Km 0.3 Aibonito, Puerto Rico 00609	Baxter (India) Pvt. Ltd., Plot No. 69-72, Sidco Pharmaceutical Complex, Alathur – 603110, Kanchipuram District. Tamil Nadu, India	89 Centre Street Allston, Ontario, Canada L9R 1W7	Ing. Salvador Sanchez Colin No. 9, Parque Industrial Atlacomulco, Mexico C.P. 50450
927 South Curry Pike Drive Bloomington, IN 47402	Jevany-Bohumil, 281 63 Kostelec nad Cernymi lesy Bohumil, Czech Republic	Calle 36, No. 2C-22, Apartado Aero 2446, Cali, Colombia	Silangan Industrial Estate, Brgy. Canlubang 4028, Calamba City, Laguna, Philippines
Apdo. 1-7052 Ave. Las Americas Parque Industrial Cartago, Costa Rica	Moneen Road, Castlebar, Co Mayo, Ireland	911 North Davis Cleveland, Mississippi 38732	Avenida de los 50 metros No. 2 CIVAC, Jiutepec, Morelos, México CP 62578 Cuernavaca
Via Nuova Provinciale I-23034 Grosotto (SO), Italy	6 Jiao Yuan Road, Dong Ji Industrial District, GETDD, Guangzhou City, Guangdong Province, PR China	State Road 3, Km 142.5 Guayama, PR 00784	Kanstrasse 2, D-33790 Halle/Westfalen, Germany
Artur-Ladebeck-Str. 136 D-33647 Bielefeld Germany	1978 West Winton Avenue Hayward, CA 94545	17511 Armstrong Avenue Irvine, CA 92614	Road 144, Km 20.6 Jayuya, Puerto Rico 00664
Bldv. René Branquart, 80, B-7860 Lessines, Belgium	4501 Colorado Blvd. Los Angeles, CA 90039	A47 Industrial Estate Marsa HM R15, Malta	Eczacibasi-Baxter Hastane Urunleri Sanayi ve Ticaret A.S., Pirmal Keceli Bahcesi, Ayazaga, 34390 Istanbul, Turkey
Baxter (India) Pvt. Ltd., Plot No 183, Sector 5, IMT, Manesar, Gurgaon, Haryana – 122050, India	4584-1 Ohaza Kihara, Kiyotake-cho, Miyazaki-shi, Miyazaki-ken, 889-1601, Japan	Bieffe Medital Manufacturing Sarl, Km 11, Route de Chebbaou, Oued Ellil, 2021 Manouba, Tunisia	1900 N. Highway 201 Mountain Home, Arkansas 72653
Route de Pierre-à-Bot 111 2000 Neuchâtel, Switzerland	Via Giovan Batista Oliva, Loc. Ospedaletto I-56121 Pisa PI, Italy	Via della Chimica, 5 I-02010 Cittaducale (Rieti), Italy	Ctra. Biescas-Senegüé E-22666 Sabiñánigo (Huesca), Spain
Via dell' Osmannoro, 253, I-50019 Sesto Fiorentino (FI), Italy	388 Tingzhu Road, Jinshan District, Shanghai 201506, PR China	2, Woodlands Industrial Park D. Singapore 738750	27 Bai Yu Road, Suzhou Industrial Park, Suzhou City, Jiangsu Province, 215021, PR China
Foxford Road, Swinford, Co Mayo, Ireland	Caxton Way, Thetford Norfolk IP24 3SE United Kingdom	Baxter (India) Pvt. Ltd., B-15/2, MIDC Industrial area, Waluj, Aurangabad - 431 136 Maharastra, India	1700 Rancho Conejo Blvd. Thousand Oaks, CA 91320
Tiedong Road, Beichen District Tianjin 300402, PR China	1 Baxter Drive, Old Toongabbie New South Wales, 2146 Australia		Wojciechowska 42B str., Lublin 20704 Poland
UK Pharmacy Services-Thames Valley Unit Taurus Building, Unit B Peterley Road, Horspath Industrial Estate Cowley, Oxford, OX4 2TZ United Kingdom	UK Pharmacy Services-North West Unit Unit 1 Boundary Court Crossley Road, Heaton Chapel Stockport, SK4 5GA United Kingdom		UK Pharmacy Services-Mount Vernon c/o Mount Vernon Hospital Rickmansworth Road Northwood, HA6 2RN United Kingdom

Addendum to Baxter International Inc. ISO 14001:2004 Certificate #326, Version #25

Initial Issue Date: 04 August 2005

Reissue Date: 7 March 2012

Revision Date: 29 November 2012

Expiry Date: 3 August 2014

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Scope: Warehouse and distribution activities associated with the manufacturing, research and development of medical, biotech and pharmaceutical products			
33 Vestey Drive Mount Wellington Auckland, New Zealand	1 West Bank Road, Belfast Harbour Industrial Estate, Belfast BT3 9JL Northern Ireland	Vogelsangstraase 28 CH-8307 Effretikon, Switzerland	Höchstadt Warehouse and Technical Service Center Baxter Deutschland GmbH Am Aischpark 7+9 91315 Höchstadt a.d.Aisch Germany
Poligono Ind. El Cebadal Calle Misiones 11, E-35004 Las Palmas, Spain	BDCE S.A., Chemin de Papignies, 17b B-7860 Lessines, Belgium	6036 HWY 5 N Midway, AR 72651	Via Trentino 18/20 I-35043 Monselice PD, Italy
Salthouse Road Brackmills Industrial Estate Northampton, NN4 7UF UK	Sintra Business Park, Edificio 10, Zona Industrial da Abrunheira, P- 2710-089 Sintra, Portugal	Poligono Industrial Sector 14 C/Pouet de Camilo, 2 E-46394 Ribarroja del Turia Valencia, Spain	15903 Strathern Street Van Nuys, CA 91406
Scope: Research and development of medical, biotech and pharmaceutical products			
2-4 Boulevard d'Angleterre, B-1420 Braine l'Alleud, Belgium			
Scope: Warehouse, distribution and office activities associated with the manufacturing, research and development of medical, biotech and pharmaceutical products, which may include technical service operations		Scope: Manufacturing, research and development of medical, biotech and pharmaceutical products and associated warehouse and distribution activities	
7 Deansgrange Business Park, Blackrock, Co Dublin Ireland		Round Lake Technology Park 25212 W. Illinois Route 120 Round Lake, Illinois 60073	
Scope: Office activities associated with the manufacturing, research and development of medical, biotech and pharmaceutical products and associated warehouse and distribution activities			
Muellerenstrasse 3 CH 8604 Volketswil Switzerland			
Scope: Manufacturing, research and development of medical, biotech and pharmaceutical products			
Uferstr. 15 A-2304 Orth/Donau Austria		Industriustrasse 67 A-1221 Vienna, Austria	
Scope: Manufacturing of medical, biotech and pharmaceutical products and associated office activities		Scope: Manufacturing of medical, biotech and pharmaceutical products and associated warehouse and distribution activities	
Av. Eng. Eusebio Stevaux, 2555 Santo Amaro - CEP 04696-000 Sao Paulo, Brazil		Highway 221 North Marion, NC 28752	
Sales and marketing activities associated with medical, biotech and pharmaceutical products, which may include administration, technical services and/or field operations			
6 Avenue Louis-Pasteur B.P. 56, F-78311 Maurepas Cedex France		Piazzale dell'Industria 20 Rome 00144 Italy	

Bloomington, Indiana

Corporate EHS Audit

(Part of Ethics & Compliance – Legal Department)

April 30 – May 3, 2012

Audit Team

Philip Underhill

Jennifer Saba

Barry Bernstein

Mike Cycyota

Closing Presentation

**Facility remains in good standing in accordance with
Baxter's ISO 14001 and OHSAS 18001 group certificates**



Congratulations

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Acceptable Corrective and Preventive Action Plan. Report must be reviewed by ERM CVS in London. There may be questions and some communications to confirm this recommendation. Certificate or logo should not be used to indicate product conformity. You are required to inform ERM CVS of significant changes to management, activities, incidents, actions by regulators or others on the environment.