

**DIRECT IMPORT GUIDE**

**FOR**

**PRODUCT SUPPLIERS**

**Version Date : 1/13/25**

**For more information follow the link below.**

<https://cvssuppliers.com/document-library/import>

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**CVS IMPORT/QA DEPARTMENT CONTACT LIST**

|  |  |  |
| --- | --- | --- |
| **Name/Title** | **E-mail Address**  | **Contact for:** |
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| **Debby Dutch** Product Advisor, Store Brands Quality Assurance | Debby.Dutch@cvshealth.com | Import Product Testing  |

**CVS CONSOLIDATION TERMS AND SHIPMENT WINDOW**

CONSOLIDATION

Yusen Logistics is CVS’ designated Freight Forwarder / Logistics Provider for all origin points and performs the following:

* Receives all cargo according to CVS Purchase Order specifications
* Verify required export and import documents
* Issue all Forwarders Cargo Receipts (FCR)
* Arrange for all Ocean Bills of Lading
* CVS requires that all cargo be delivered at the supplier’s expense to the consolidation point servicing the port specified in the Open Account Transaction as specified by Yusen Logistics. A complete list of Yusen FOB consolidation point contacts are listed on page 11. Shipment booking should be placed with Yusen Logistics through its e-booking platform and must be made at least 14 days prior to Early Ship Date. For the registration form and e-booking procedure, please go to Yusen Logistics e-booking website: [https://ebookprod001.yvp.yusen-logistics.com/us](https://protect-usb.mimecast.com/s/bLycC8Xr70IY8G90y8PtnL1xa?domain=ebookprod001.yvp.yusen-logistics.com)

**FACTORY LOAD**

Factory load requests must be for product with the same destination (e.g., La Habra, Patterson, Kearny, Pooler, Virginia Beach, Long Beach and Honolulu).

* Purchase orders for the following DCs may be combined, as all are destined to Long Beach, CA: Kansas City, MO, Indianapolis IN, Novi MI, Ennis TX, Conroe/Houston TX and Tolleson, AZ.
* Purchase orders for the following DCs may be combined, as all are destined to Pooler, GA:

Orlando FL, North Augusta/Beech Island SC and Vero Beach FL.

* Purchase orders for the following DCs may be combined, as all are destined to Kearny, NJ:

Woonsocket/North Smithfield RI, Lumberton NJ and Chemung/Waverly NY.

* Purchase orders for the following DCs may be combined, as all are destined to Virginia Beach, VA:

Knoxville/Louden TN, Somerset PA and Fredericksburg VA

* If a supplier is unable to fulfill the below equipment criteria, then the freight must be delivered to Yusen for consolidation. Exceptions to this policy must be routed through the CVS Import Department.

|  |  |  |  |
| --- | --- | --- | --- |
| **EQUIPMENT TYPE** | **MINIMUM CBM** | **DESIRED CBM** | **MAXIMUM WEIGHT** |
| 45’ High Cube Container | 76 | 77 | 42,500 pounds |
| 40’ High Cube Container | 67 | 68 | 43,000 pounds |
| 40’ Standard Container | 58 | 59 | 43,000 pounds |

**CVS SHIPMENT WINDOW**

The CVS Purchase Order and Open Account Transaction specify the parameters of CVS product shipment window. Adherence to the pre-defined shipment window is critical to our mutual success. Acceptance of a purchase order means acceptance of the ship window. Shipment is considered delivered when goods and clean documents are accepted as reflected by the FCR

transaction date. **The CVS one-week import shipment window is defined as below**:

|  |  |  |  |
| --- | --- | --- | --- |
| **FIELD** | **DEFINITION** | **TIMING** | ACTION |
| ESD | **E**arly **S**hip **D**ate | Day 1 of 7 | First day cargo and documentation may be delivered |
| FDD | **F**actory **D**elivery **D**ate | Day 4 of 7 | Preferred date of cargo and documentation delivery |
| LSD | **L**ast **S**hip **D**ate | Day 7 of 7 | Last date cargo and documentation must be delivered to avoid penalty |

**FCR PENALTY CLAUSE**

Shipments with FCR Transaction Dates past the Last Ship Date will be subject to the below penalties:

|  |  |
| --- | --- |
| **FCR COMPLETION DATE** | **PENALTY LEVEL** |
| 1-7 Days after Last Ship Date | **3 %** Penalty deduction from the Open Account Transaction |
| 8-14 Days after Last Ship Date | **5 %** Penalty deduction from the Open Account Transaction |
| 15-21 Days after Last Ship Date | **7 %** Penalty deduction from the Open Account Transaction |

**CUSTOMS & COMMERCIAL DOCUMENT REQUIREMENTS**

**UNDERSTANDING CUSTOMS & BORDER PROTECTION (CBP) REQUIREMENTS**

CVS Pharmacy Inc. has a legal obligation to provide accurate and complete documentation to Customs and Border Protection (CBP), among other partnering government agencies for its imported merchandise.

Customs published an informal compliance publication to assist importers and shippers understand the requirements and responsibilities involved in the importation process. It is titled, “What Every Member of the Trade Community Should Know About: Reasonable Care (A Checklist for Compliance)” and can be found at the below link: (may be necessary to copy and paste link): <https://www.cbp.gov/document/publications/reasonable-care>

**COMMERCIAL DOCUMENT REQUIREMENTS**

The accuracy and completeness of information contained on a commercial invoice and packing list are imperative to meet the Reasonable Care guidelines and legal obligations. The supplier is responsible for generating accurate and compliant commercial documents. Below is an adapted summary of the general invoice requirements for CBP purposes, as well as other CVS specific requirements. A copy of the actual Customs Regulation (19 CFR 141.86) can be found at the below link (may be necessary to copy and paste links):

<http://edocket.access.gpo.gov/cfr_2004/aprqtr/pdf/19cfr141.86.pdf>

**Customs Requirements**

Seller name and address Purchasers name and address

Actual manufacturer’s name and address Port of Entry

Country of Origin Carton marks and numbers

Detailed description of the merchandise Itemization of values

Purchase price in U.S. dollars Quantities in weights and measures

Terms of sale

Assists or extraneous payments to acquire the merchandise

Discounts or adjustments to the price after purchase order generation

**CVS Additional Requirements**

One commercial invoice per supplier Notify party of the B/L should be:

Delineate all items and purchase orders Geodis USA, LLC

Open Account Transaction Number 5101 S Broad St

General Conformity Certificate (GCC) by item Philadelphia, PA 19112

**DUTY ASSESSMENT COMPLIANCE**

CVS holds the supplier responsible to submit accurate product duty rates and corresponding HTS numbers. Inaccurate duty rates / HTS numbers that result in a higher duty payment may result in a request for a reduction of the FOB or a supplier charge-back for the difference between actual duty **rate paid verses** the supplier quoted duty rate.

**QUANTITY OF MERCHANDISE RECEIVED - OVERAGES**

If CVS receives a quantity of merchandise greater than the quantity ordered pursuant to 19 U.S.C. § 1499(a)(3) and 19 C.F.R. §141.4 and that merchandise was not specified on the seller’s invoice or included on the U.S. Customs entry, CVS has an obligation to declare the additional merchandise, file the appropriate revised entry documents for the overage and pay the additional duties, fees, and taxes thereon to CBP accordingly.  CVS will not reimburse any payment to our suppliers for erroneous overages.

 **PRODUCT & CARTON MARKINGS**

**COUNTRY OF ORIGIN MARKING**

Federal Regulations mandate that every article imported into the United States must be marked in a conspicuous place as legibly, indelibly, and permanently as the nature of the article will permit in such a manner as to indicate to the ultimate purchaser in the United States the English name of the articles country of origin.

**CARTON SIZE**

Cartons must comply with the below size/weight requirement unless approved by the Import Department.

|  |  |
| --- | --- |
| **MINIMUM CASE DIMENSIONS**  | **MAXIMUM CASE DIMENSIONS**  |
| 3″ H x 8″ W x 8″ L – (.11 Cubic Feet)  | 28″ H x 20″ W x 30″ L – (9.7 Cubic Feet)  |
| Minimum Case Weight = 3 pounds  | Maximum Case Weight = 50 pounds  |

**OUTER CARTON MARKINGS**

Outer carton must be marked with the CVS item number found on the purchase order, item description, event, po case pack and the origin information. All **seasonal merchandise** requires a **color label eight inches long by five inches wide, printed directly on all four sides of a carton (containing event code, event category and store set up date.) Shown in the EDI “PO Comments” field** or as large as possible for smaller cartons. **PO Comments supersede the below dates.**

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **SEASON (EVENT) \*\*\*\*** | **LETTERING for ODD numbered years**  | **LETTERING for EVEN numbered years**  | **Store Set Up Date** | **LABEL COLOR - PMS #**  |
| **Valentine**  | **VA**  | **VL**  | **12/29/2024** | **Pink - PMS #232** |
| **Spring / Lawn & Garden** | **SP**  | **LG** | **2/15/25 3/16/25** | **Yellow - PMS Process Yellow**  |
| **Easter**  | **EA**  | **ES**  | **2/15/2025** | **Yellow - PMS Process Yellow**  |
| **Summer** | **SM**  | **SU**  | **4/21/25 5/18/25 6/15/25** | **Blue - PMS #2935**  |
| **Back to School**  | **BS** | **BT** | **7/20/2025** | **Orange -PMS #021**  |
| **Fall Décor / Thanksgiving**  | **TK**  | **FD**  | **8/24/2025** | **Brown - PMS #463**  |
| **Halloween**  | **HA**  | **HW**  | **7/20/25 8/24/25** | **Black - PMS Process Black**  |
| **Fall and Winter**  | **FL** | **FW** |  **8/24/25 9/28/25 11/30/25** | **No Fill** |
| **Christmas Toys, PGM, Plush, Books & Accessories**  | **XM**  | **XC**  | **8/24/25 9/28/25 11/1/25** | **Green - PMS #7482**  |
| **Christmas** | **XM** |  **XC**  | **11/1/2025** | **Red - PMS #199** |
| **Christmas - Wrap, Boxes, Bows, Ribbon, Bags** | **XM** |  **XC** | **11/1/25 11/16/25 12/8/25** | **Red - PMS #199** |
|  |  |  |  |  |
| **\*\*\*\*** All seasonal events are not listed. For seasonal events not listed - label color is "No Fill".  |
| Events shown above may have more set dates than noted, review the EDI "po comment" field for correct event code, event category and set date per order. **NOTE:** If you currently do not receive the po comment from your EDI provider - you must contact them to fulfill this requirement.  |

**CARTON MARKING EXAMPLES**

**Sample carton markings for all DCs:**

RIGHT AND LEFT SIDE

**XM**

**Plush**

**SET DATE**

**00/00/00**

FRONT AND BACK EXAMPLE

 CVS item # 777555 Contents Plush dog w hat Gross Weight 10lb. Dimensions 10"x12"x8"

**XM Plush**

**SET DATE**

**00/00/00**

CVS/pharmacy

Item # 777555

Contents Plush Dog w Hat

Event XM

\*Case Pack / Inner Pack 24 / 4

Country of Origin / FOB China / SHA

**\*Note:** **Displays** are to be noted as case pack “1” (no inner pack mark) as reflected on the EDI purchase order.

Outer carton of **display merchandise** must be marked with the CVS display number found on the purchase order, not the CVS content numbers.

If there is no inner just list “case pack”.

**CORRUGATE INNER PACK MARKINGS**

All corrugate inner packs require the same sku and seasonal information that is

printed on the master carton.

Mark the CVS six digit item number and number of pieces within the inner package

and include the colored event marking as shown on the outer carton

**XM plush**

**SET 00/00/00**

FRONT AND BACK EXAMPLE

**XM Plush SET 00/00/00**

CVS Item # 777555

Inner Pack 4

RIGHT AND LEFT SIDE

**VERIFICATION**

Prior to issuance of a Forwarders Cargo Receipt, Yusen will verify the application and accuracy of carton markings in accordance with the published standard and the specific CVS Purchase Order.

**CORRUGATE PACKAGING AND PALLET REQUIREMENTS**

Minimum standards for corrugate quality for cartons entering the CVS supply chain must be followed. Understanding that cartons are handled many times by numerous parties on their journey to our stores, it is our goal to ensure the product inside the carton arrives in pristine, saleable condition.

While we reference specific requirements below, it is important to understand that CVS does not intend to implement QA testing of corrugate at this point in time. We do intend to work closely with our suppliers, global forwarder, distribution centers and stores to ensure corrugate quality is consistent with our expectations. Should corrugate quality fail to meet expectations, CVS reserves the right to have the supplier submit future shipments for QA testing, and / or impose a penalty.

**PACKAGING AND PALLET REQUIREMENTS**

* Must be designed and structured to ensure the following:
	+ Overseas shipping
	+ Long haul transportation from port to DC
	+ Structural integrity of stacked pallet not to be adversely affected by elevated temperature and/or high relative humidity (greater than 75%)
	+ If weight loaded it must be able to withstand 90 days without failure
* Stacking pallets require the following (though shipments are floor loaded in ocean containers -goods are palletized at transload and distribution centers for movement throughout the U.S. to CVS stores)
	+ Pallets with loads under or at 750lbs must be able to demonstrate structure by withstanding 1500lbs of weight on the bottom product layer without damage
	+ Pallets with loads over 750lbs must be able to demonstrate structure by withstanding 2500lbs of weight on the bottom product layer without damage
	+ No overhanging of boxes as these can create stress areas and become subject to load failure
	+ Pallet layers must stack flat; product cannot bow in the center of the carton after being taped shut
* Master Shipping Containers
	+ Moisture Resistant Adhesive (MRA) must be employed on all corrugate subjected to +75%RH during transit

It is the supplier’s responsibility for structural quality/integrity while their product is in the CVS supply chain.

**INVOICE AND PACKING LIST**

Yusen Logistics web applications for invoice and packing list generation are to be utilized for all shipments.

**CVS ITEM PRESENTATION**

CVS Pharmacy is pleased to announce that Li & Fung (LF) has become a global sourcing agent effective December 21st. The benefits of this strategic supply chain partnership are many, but in summary the goal is to enhance and strengthen CVS Pharmacy’s supply chain and ensure your continued success as our vendor partner.

For questions regarding Li & Fung, please reach out to the following individuals:

Suey Yuen, Senior Vice President Belinda Cheung, General Manager - Onboarding

Email: sueyyuen@lfsourcing.com Email: belindacheung@lfsourcing.com

Leo Ngai, Divisional Manager Andy Cheng, Head of Quality

Email: leongai@lifung.com Email: andycheng@lfsourcing.com

Satte Tsao, Head of Compliance

Email: sattetsao@lifung.com

**CVS DIRECT IMPORT PAYMENT PROCESS**

All direct import shipments are paid via Open Account Transactions (OATs) managed by The Bank of New York Mellon on behalf of CVS. All pertinent documents stipulated on OATs must be forwarded to BNY Mellon. Invoices should not be submitted to CVS via EDI transmission, nor mailed directly to CVS.

**Current terms for Open Accounts are sight + 60 days.** (Sight is defined as the day documents are received by BNY Mellon and deemed accurate and complete for payment.)

New suppliers are required to submit an Open Account Vendor Profile to CVS including primary and secondary contacts and banking information, prior to purchase order release - **to the CVS category manager**. **New suppliers that need to provide a profile for set up on Open Account, please forward to the CVS category manager with a cc to** **Denise Ehnes at:** Denise.Ehnes@cvshealth.com and Elaine Lamoureux at Elaine.Lamoureux@cvshealth.com

Subsequent OAT detail, instructions, and remittance advices will be e-mailed by BNY Mellon to the contacts listed on this form. Contacts listed in the Vendor Profile are the only parties that will be forwarded this information. The information listed on the cover letter submitted for presentations must mirror the information provided on the Vendor Form exactly, to avoid payment delays.

Suppliers with general questions about the CVS Open Account program can contact BNY Mellon using the email address: Trade.Inquiries@BNYMellon.com

***Note:***  BNY Mellon's pricing for processing open account transactions will be a flat fee plus courier fee for a maximum 20 POs per drawing/presentation, while each additional PO on top of the 20 POs will be charged at a per PO cost.  BNY will provide actual costs. A single drawing can comprise any number of document sets (invoices, packing lists, etc.), as long as those sets are accompanied by 1 cover letter indicating 1 OAT Reference No.

i.e. Sets of documents (FCRs, invoices, packing lists) may be presented for up to 20 purchases orders under one cover letter. Of course, document sets may be presented one or two POs at a time, however full charges apply for each presentation.

**MISQUOTATION OF CASE CUBE ON CVS NEW ITEM FORMS**

OVERSTATING CARTON DIMENSIONS

* Actual case cube is overstated (New Item Form Height x Width x Length is greater than actual shipped product Height x Width x Length)
* Item actual landed cost is less than estimated by supplier on quote sheet – (actual ocean freight less than ocean freight portion of Import New Item Sheet)
* Actual margin is greater than book margin – excess margin booked to purchase price variance – company numbers reflect accurate margin, margin by CM understated
* Case cube is used by CVS for several reasons: forecasting ocean equipment needs, forecasting space and manpower needs for the DCs, which all have a direct impact on ocean freight costs and shipment lead time

**SOLUTION** – Suppliers will be charged $500 USD per item shipment where the cube is incorrectly overstated on the new item form submitted to the Category Manager and used to create purchase orders. CVS will allow a range of up to 10% off before the penalty is enforced. Penalties will be per item shipment. CVS reserves the right to take additional steps, for repeat offenders.

For example: Supplier A submits an item with a case cube of 2 cubic feet, but item actually is 1.9 cubic feet - supplier will not be penalized (5% variance). Supplier B submits an item with a case cube of 2 cubic feet, but item is actually 1.5 cubic feet (25% variance) - supplier will be penalized $500 USD.

**Penalties assessed must be paid within 30 days.**

# UNDERSTATING CARTON DIMENSIONS

* Actual case cube is understated (New Item Form Height x Width x Length is less than actual shipped product Height x Width x Length)
* Items actual landed cost is more expensive than estimated by supplier on new item form – (actual ocean freight more expensive than ocean freight portion of Import New Item Form). This may make supplier A’s price look like a better deal than supplier B’s, until you see at a later date the actual landed cost of supplier A’s item was greater than supplier B’s, who quoted an accurate case cube for his item.
* Actual margin is less than book margin – margin shortfall booked to purchase price variance – company numbers reflect accurate margin, margin by CM over-stated.
* Case cube is used by CVS for several reasons: forecasting ocean equipment needs, forecasting space and manpower needs for the DCs, which all have a direct impact on ocean freight costs and shipment lead time

**SOLUTION** – Suppliers will be charged $500 USD per item where the cube is incorrectly understated on the new item form submitted to the Category Manager and used to create purchase orders. CVS will allow a range of up to 10% before the penalty is enforced. Additionally, the supplier will be charged for any incremental ocean freight charges CVS incurs above what it should have incurred if the carton dimensions were quoted accurately. Penalties will be per item shipment. CVS reserves the right to take additional steps, for repeat offenders.

**Penalties assessed must be paid within 30 days.**

|  |  |  |  |
| --- | --- | --- | --- |
|  |  |  |  |



|  |
| --- |
| **CVS FREIGHT RATES BY CUBIC FOOT** |
| **Effective for direct import items presented or purchased in 2025, shipping (FDD) from March 1, 2025 - February 28, 2026** |
|   |  |   |   |   |   |
|   |   | **ORIGIN** |  **Full Container Rates (FCL)**  |   |  |
|   |   | **Yantian** | **$4.15** |   |  |
|   |   | **Hong Kong** | **$4.15** |   |  |
|   |   | **Ningbo** | **$4.15** |   |  |
|   |   | **Shanghai** | **$4.15** |   |  |
|   |   | **Xiamen** | **$4.18** |   |  |
|   |   | **Qingdao** | **$4.19** |   |  |
|   |   |  |  |   |  |
|   |   | **India,** Nhava Sheva, Mangalore | **$4.46** |   |  |
|   |   | **Indonesia,** Jakarta - Surabaya | **$4.42** |   |  |
|   |   | **Korea,** Busan | **$4.17** |   |  |
|   |   | **Malaysia,** Port Klang | **$4.27** |   |  |
|   |   | **Taiwan,** Kaohsiung | **$4.31** |   |  |
|   |   | **Thailand,** Bangkok - Laem Chabang | **$4.30** |   |  |
|   |   | **Vietnam,** Haiphong - Ho Chi Minh **-** Cai Mep | **$4.33** |   |  |
|   |   | **Bangladesh,** Chittagong | **$4.54** |   |  |
|   |   | **Cambodia,** Sihanoukville | **$4.42** |   |  |
|   |   | **Philippines,** Manila | **$4.40** |   |  |
|   |   |   |   |   |  |
|   | **Miscellaneous Rate for 2025 is .019 X FOB**  |   |  |
|   |   |  |  |  |   |
|   |   |   |   |   |   |
| Note: Eligble China ports have changed. If an origin being considered for quotation is not on this list, please contact **Steve Genereux - Director Inbound Transportation -** stephen.genereux@cvshealth.com, **Brian Pearce** - Lead Director of DI Supply Chain and Customs Compliance or Elaine Lamoureux - elaine.lamoureux@cvshealth.com - include initial volume and order frequency. |
|  |  |  |  |  |  |

**PRE-TICKETING**

**PRE-TICKETS OR HANG TAGS**

The category manager will determine if pre-pricing is required and provide the information, requirements and other guidance as needed.”

**PRODUCT MARKINGS FOR PRIVATE LABEL MERCHANDISE**

The following distribution statement as shown must be printed on all store brand merchandise that is shipped to CVS. Each individual item must be marked.

Distributed by: **CVS** Woonsocket, RI 02895

**CVS UPC/EAN REQUIREMENTS**

1. CVS UPC/EAN Policy requires our suppliers to mark each item with a UPC/EAN bar code in compliance with all UCC Standards.
2. UPC/EAN should appear on the back, bottom or side panel. Front panel as a last option must be approved by the category manager.
3. Bar code background and foreground must be of contrasting colors.
4. UPC/EAN must be scan-able within a maximum of two attempts.

**CVS ETHICAL SOURCING AND CTPAT COMPLIANCE PROGRAM**

The objective of our Ethical Sourcing and CTPAT Compliance Program is to ensure our supplier partners share our commitment and values to upholding the highest level of ethical standards and integrity wherever our products are manufactured globally.

This program primarily consists of two types of audits that are required:

* **Social Compliance** (including but not limited to full Social Compliance and/or Surface), focusing on local law and international standards relating to human rights concerns.
* **Security** focusing on CTPAT requirements.

**Factory Audit Process:**

* Within five (5) business days of receiving a Purchase Order (PO), suppliers are responsible for registering their primary factory (-ies), Tier 1, and Tier 5 subcontractors on <https://smartapps.ul.com/>. The supplier can expect an email communication from the UL Solution Support Team outlining the Factory Registration Instructions.

Below are our subcontractor definitions:

* + **Tier 1** - Producing finished merchandise where substantial manufacturing occurs to render the product a finished item, including major components and/or individual products packaged together as part of a kit.
	+ **Tier 5** - Packing facility (the facility that puts the product into the final point of purchase packaging containing any CVS branded logos, distributed by CVS statements, distributed by Advanced Healthcare statements or any other references to CVS).
* UL Solutions will schedule and conduct the required audit. **Note:** CVS will consider accepting RSWA, ICTI, RBA, WRAP, BSCI, SA8000, UL Facility Security Template, and GSV audit reports in lieu of an initial CVS audit if they meet our acceptance criteria. We do not accept SMETA or SCAN at this time. For more information, please contact Ethical.Sourcing@cvshealth.com.
* Within 5 business days after the audit, UL Solutions will send the supplier and factory a report package, which will include the necessary information to book with our freight forwarder, Yusen Logistics. Factories need to receive a passing grade for each audit type to be authorized to ship. The shipping approval for Social Compliance & Security is outlined as follows:

|  |  |
| --- | --- |
| Social Compliance AUDIT GRADE | SHIPPING APPROVAL |
| Access Fully Denied | Item(s) **NOT** allowed to ship. |
| Zero Tolerance | Item(s) **NOT** allowed to ship. |
| Alert Notification | Item(s) **NOT** allowed to ship. |
| Critical  | Item(s) **NOT** allowed to ship. |
| High Risk  | Item(s) allowed to ship unless the factory has received three (3) consecutive High Risk grades per the CVS Pharmacy, Inc. Repeated Poor Performance Policy. |
| Intermediate Risk  | Item(s) allowed to ship. |
| Low Risk | Item(s) allowed to ship. |
| Security AUDIT GRADE | **SHIPPING APPROVAL** |
| Access Fully Denied | Item(s) **NOT** allowed to ship. |
| Zero Tolerance | Item(s) **NOT** allowed to ship. |
| Alert Notification | Item(s) **NOT** allowed to ship. |
| Needs Improvement | Item(s) allowed to ship unless the factory has received three (3) consecutive Needs Improvement grades per the CVS Pharmacy, Inc. Repeated Poor Performance Policy. |
| Subject to Improvement | Item(s) allowed to ship. |
| Preferred  | Item(s) allowed to ship. |

* Supplier/factory will be required to provide a Corrective Action and Preventative Action (CAPA) plan within 30 business days.
* Suppliers are responsible for all factory audit charges (paid directly to UL Solutions), including travel expenses. After the audit is conducted, UL Solutions will email an invoice within 48 hours communicating the payment details including the audit costs to the supplier.

**Countries Requiring Incremental Due Diligence:**

The countries listed below are considered High Risk and require special approval from the CVS Executive Director of Quality Assurance in order to be considered. If they are approved for consideration, they will need to undergo our standard audits, as well an additional due diligence audit. Please note that this list is subject to change at any time, without notice, at the discretion of CVS Pharmacy, Inc.

• Bangladesh

• Cambodia

• Ethiopia

• Haiti

• Ivory Coast (Cote d’Ivoire)

• Jordan

• Malaysia

• Myanmar

• Pakistan

• Uzbekistan

• Disputed borders between countries

**Zero Tolerance**

If any of the Zero Tolerance findings listed are identified during an audit, the factory will be immediately placed on Probation. When this occurs, all PO’s will be cancelled, the factory will not be authorized to ship or produce for CVS Pharmacy, Inc., and if applicable, there may also be impacts to inventory. Additionally, the associated supplier will be fined, and assigned a strike, which could lead to a reduction or cancellation of business.

|  |  |
| --- | --- |
| Child Labor | The hiring of workers in a factory who are below the minimum age requirement based on country local law, or the age of 16 (whichever is higher). |
| Forced, Prison Labor, Human Trafficking | The use of employees who are imprisoned, bonded, or indentured either to the factory itself or to a broker. This includes the presence of North Korean workers. (i.e., employees utilized in a manner not in accordance with International Labor Convention 29 ). |
| Abuse and Harassment  | There is evidence of either sexual, psychological, physical, verbal harassment, abuse, intimidation and/or bullying occurring at the factory.  |
| Life Threatening Conditions  | There are permanently blocked or locked emergency evacuation pathways/ aisles to exit/ doors/ stairways. |
| Bribery | There is evidence of the factory bribing or attempting to bribe the auditing team or CVS Pharmacy, Inc. staff in any manner. |
| Confirmed falsified audit report and/or business license | There is evidence of the factory submitting falsified audit reports or business license to circumvent the requirements of the social and/or security audit. |
| Intentional nondisclosure of finished goods subcontracting | The factory is using a subcontractor to manufacture finished goods (Tier 1, Tier 5) without first having disclosed the subcontractor to CVS Pharmacy, Inc.  |

**Alert Notifications**

Alert Notification findings are serious findings cited during an audit that can lead to factory probation. CVS Pharmacy, Inc. allows the supplier and factory the opportunity to remediate these findings, provided it is done so immediately. The following audit findings are Alert Notifications:

* + Temporarily Blocked Emergency Evacuation Exits and/or Pathways (not corrected during the audit)
	+ Locked Emergency Exits
	+ Passport Retention
	+ Missing Business License
	+ Non-disclosure of subcontracting (Tier 1, Tier 5 subcontractors)
	+ Discrimination with regard to age, gender, minority status and/or other protected classes and upholds the right to freedom of organization. Workers should not be subjected to medical testing that could lead to discrimination (e.g. pregnancy testing of female workers)

**NOTE:** Ablocked emergency exit(s) may be corrected at the time of the audit. If corrected, the finding will not impact the final audit grade. However, the correction of the finding will still be noted in the final audit report.

The Alert Notification process is as follows:

* Within 24 hours the Supplier must agree to remediate the finding
* Within 48 hours the Supplier must provide evidence that the finding has been remediated
* UL Solutions will conduct an unannounced verification audit within 30 days to ensure that this is not a reoccurring issue

The factory is not authorized to ship until all of the above actions have taken place.

For a copy of our Supplier Manual, or additional information regarding the Ethical Sourcing & CTPAT Compliance Program, please contact Ethical.Sourcing@cvshealth.com.

**CVS Direct Import Product Assurance Testing Program**

Product testing supports the commitment of CVS to offer quality products to its customers. CVS has partnered with Bureau Veritas Consumer Products Services, Inc. (BV), SGS Consumer Testing Services (SGS) and UL Solutions (UL) for categories noted below, to establish a comprehensive testing program to monitor and ensure compliance with all applicable regulations as well as industry and corporate quality standards.

As a part of this program, **all products, in the form of final production samples, must be tested prior to purchase at BV, SGS or UL exclusively, unless approved by CVS**.  Other reports may be reviewed/considered by CVS QA in lieu of BV/SGS/UL in certain situations such as critical business disruption, missing FDD due to lab turnaround times, etc.  Reports must include all CVS protocol requirements to be considered for potential acceptance (See additional information regarding the transfer of certain testing results on page 5)

**ALL CVS Store Brand items with the “CVS Logo” on packaging and 50428 UPC should be tested at UL Solutions**

**ALL Non-Store Brand items should be tested by Bureau Veritas (BV) or SGS except for the following FDA Regulated categories:**

* Food, human or pet
* Over the counter (OTC) drugs
* Cosmetics including bath & fragrance products
* Dietary supplements
* Medical Devices requiring a listing number

**Overall CVS program questions should be directed to the following contacts**

|  |  |  |  |
| --- | --- | --- | --- |
|  | **Bureau Veritas US** | **Bureau Veritas Overseas** |  |
|  | Lucy Feng, Key Account Manager - Lucy.Feng@bureauveritas.com | Hon Wong, Global Program Manager -Hon.Wong@bureauveritas.com |  |
|  |   |   |  |
|  | **SGS US** | **SGS Overseas**  |  |
|  | Chantel Grimmer, Key Account Manager – Chantel.Grimmer@sgs.com | Patrick Liu, Regional Key Account Manager – Patrick.Liu@sgs.com |  |
|  |   |   |  |
|  | **UL Solutions US**  | **UL Solutions Overseas** |  |
|  | Kerri Greenberg, Client Specialist, Kerri.Greenberg@cvshealth.com | Lillian Li, Key Account Manager, Lillian.Li@ul.com |  |
|  | **CVS QA DIRECT IMPORT TESTNG CONTACT** | Debby Dutch, Direct Import Testing Manager, Debby.Dutch@cvshealth.com |  |

**Sample Submission Process**

All suppliers must complete a “CVS Test Request Form” (TRF) and include it with test samples sent to testing labs. A separate TRF must be filled out for **each** CVS item number. Testing will not begin without complete TRF information. If items are purchased in a display, the display number **must** be referenced on the TRF along with all respective content numbers.

The TRF (Test Request Form) **requires** the following information:

* Sample Description
* Supplier Name and contact name and address
* CVS Item No.
* Display # (as applicable)
* Sample Quantity
* Purchase Order (PO) Numbers
* Country of Origin
* Corrective Action Taken (For retests)
* Order Quantity (For retests)
* Original Test Report Number (For retests)

Samples submitted to the CVS designated testing lab should be **final** **packaged** **product,** representative of merchandise being shipped to CVS. If final packaging is not complete, one of the following alternatives may be submitted: mockup artwork or exact replica (must be actual size). Failure to provide either will result in the item being placed on hold by the respective laboratory.

While samples should be submitted no earlier than **eight (8) weeks prior** to the specified ship date, it is necessary to submit samples at least **four (4) weeks prior to the FDD** listed on purchase orders. During certain (peak) times of the year, samples submitted too close to the FDD for standard testing will have expedited premium testing performed by the lab at the submitter’s expense.

The availability of rush testing during peak season is limited. Peak season generally runs from June through August. All test labs will do their best to accommodate all rush submissions but may not always be able to do so. You are encouraged to submit with as much advanced planning as possible, paying special attention to your FDD.

Suppliers should submit samples to the appropriate laboratory address. Please refer to CVS protocols for the specific sample size required for your product*.* Protocols can be obtained on-line from test lab website.

|  |  |  |
| --- | --- | --- |
| **Bureau Veritas**  | **SGS** | **UL** |
| To access proper test request form, visit [https://www.bvonesource.com/wps/portal](https://protect-us.mimecast.com/s/P4gPCxkwl4FJ4m3ZNCgrkcV?domain=urldefense.com). Any questions can be sent to hon.wong@bureauveritas.com | To access proper test request form, please contact the SGS contact – Patrick.Liu@sgs.com | To access proper test request form, please contact the UL Overseas contact –Lillian.Li@ul.com |

**SAMPLE COLLECTIONS OF TOYS / JUVENILE OR FDA PRODUCTS**

All items age graded 12 and under by CPSC definition, (including **all** toys), and FDA products can no longer be submitted to testing labs directly by suppliers. Products falling into those categories will require samples to be collected by the respective lab once production reaches at least 25% of the entire CVS order. Exceptions will be judged on a case-by-case basis if 25% of production is physically too large to store at the factory and/or testing must be completed sooner. Sample collection requests should be made at least one week in advance. Sample collection fees will be built into the cost of product testing paid by the supplier. You may contact the respective lab contact to ascertain the additional cost of the sample collection.

**SAMPLE SIZES**

**Initial Testing –**

* 12 samples per style (for items appropriate for children under 3 years of age).
* 12 samples per style (Christmas Stockings)
* 3 samples per style (for items appropriate for children 3 years of age and over).

**All samples are to be tested according to either the appropriate age grade as determined by testing lab or the labeled age grade, whichever is more stringent.**

**Assortments – Toys/Juvenile Products**

To keep sample sizes for these items reasonable, the following compositing procedure for assortments has been developed. An assortment is defined as one CVS Item Number that contains more than one color or style. Use the below table for determination of the number of pieces required for testing based on the number of color/styles in an assortment and children’s age.

|  |  |
| --- | --- |
|   | **Total Sample Size** |
| Number of color/styles in an assortment | Assortments appropriately age labeled for **children less than three years** of age | Assortments appropriately age labeled for **children three years of age and over and are identical in size and shape but vary in color** | Assortments appropriately age labeled for **children three years of age and over which vary in shape and/or size** |
| 1 | 12 pcs | 3 pcs | 3 pcs |
| 2 | 12 (6 pcs per color/style) | 3 (1-2 pcs per color) | 6 (3 pcs per style) |
|  3 | 12 (4 pcs per color/style) | 3 (1 pc per color) | 9 (3 pcs per style) |
| 4 | 12 (3 pcs per color/style) | 4 (1 pc per color) | 12 (3 pcs per style) |
| 5 | 15 (3 pcs per color/style) | 5 (1 pc per color) | 15 (3 pcs per style) |
| 6 | 18 (3 pcs per color/style) | 6 (1 pc per color) | 18 (3 pcs per style) |

**A minimum of three samples per shape and/or size in the assortment is required for** **testing.**

Our testing labs are authorized to request up to 12 samples or individual components as needed from the manufacturers to complete testing, such as lead analyses. The supplier may choose to submit production samples or individual components to satisfy the request. Should 12 samples not be sufficient to conduct the analysis, the technical report will then state “Insufficient surface coating was present on the received sample(s). Consequently, the lead content analysis on surface coatings according to 16 CFR 1303, “Ban of lead-containing paint and certain consumer products bearing lead-containing paint”, was not conducted.”

**Chemical Testing for Heavy Metals:**

Products that are subject to chemical analyses for lead and other heavy metals per regulatory requirements, for example 16 CFR 1303 for lead in surface paint or coatings, total of up to 12 samples or individual components may be required. For such products, the supplier may choose to submit production samples or individual components used for making the final product. In the event, 12 samples are not sufficient to conduct analysis; the test report will state “Insufficient surface coating was present on the received sample(s). Consequently, the lead content analysis on the surface coatings according to 16 CFR 1303, “Ban of lead-containing paint and certain consumer products bearing lead-containing paint”, was not conducted”.

**TESTING FREQUENCY:**

All merchandise being shipped to CVS **must be QA tested once every six months**. When the submission passes all testing, a Certificate of Compliance (COC) valid for six months from the date of issuance will be issued, unless the product is a Children’s item, then the Certificate of Compliance (COC) will only be valid for 45 days.

Any COC Extension Dates will need to be addressed with the following CVS QA Contact for product to continue to ship. CVS QA Contact – debby.dutch@cvshealth.com

CVS reserves the right to request additional testing under circumstances such as, but not limited to the following:

* A new manufacturing site
* Introduction of new regulations or standards
* Amendments to existing regulations or standards
* Changes in the country of origin
* Multiple production runs
* Extended production schedules

**CONSUMER PROTECTION SAFETY IMPROVEMENT ACT (CPSIA) / GENERAL CONFORMITY CERTIFICATE (GCC)**

CPSIA legislation requires every manufacturer to submit a certificate stating their product complies with all applicable safety rules/bans/requirements. This document must:

* be in English and list full product description
* list name, address and phone number of the manufacturer
* list the date and place product was manufactured, and date and place of testing
* provide contact information of individual storing records
* list each applicable rule, standard, and/or ban

Certificates must accompany the product through the distribution chain and must be available to the CPSC during inspections.

Under CPSIA, all children’s products must also be permanently marked (tracking label) enabling the consumer to ascertain the manufacturer, location, batch and date of production of each item. Hang tags and adhesive labels are not allowed. For children’s products as well as non-children’s products with an applicable rule, ban or standard enforced by the CPSC, full protocol testing is required for the first set of purchase orders (POs). The “first set” includes CVS purchase orders for California (Patterson and La Habra) which usually are shipped two weeks later than the other POs. **All initial testing certificates will be valid for 45 days.**

Our labs will assist you in preparing necessary documents. Unless you have a written exemption from the CPSC, CVS requires full compliance to CPSIA.

**RE-TESTS**

If any item fails initial testing, a letter will be sent along with the fail test report, informing the supplier and/or manufacturer that they must notify the test lab to arrange for a sample collection for the retest. For a retest, the supplier must submit a Corrective Action Plan to the lab for review and approval. The same number of samples as initially tested from the production lot is required, unless otherwise authorized by CVS.

Manufacturers are responsible for informing the testing lab, via the space provided on the Test Request Form, if the submission is a retest. The previous test lab technical report number, the CAP and the total order quantity should be included on the Test Request Form. A complete evaluation of the mechanical or chemical properties of the sample in which the previous failure occurred will be conducted during a retest.

Testing labs will only conduct the sample collection after **90% completion** of the manufactured or reworked merchandise. Additionally, a statement “Testing Lab Sampling is required for a retest” will be noted on the report.

For labeling only failures, two fully packaged samples will be required for a retest.

**FACTORY INSPECTIONS & STORE AUDITS**

CVS reserves the right to initiate factory site inspections and sample collections in the event that a supplier’s level of quality is falling below CVS standards. Additionally, CVS reserves the right to initiate domestic store audits to verify corrective action taken on failed merchandise. All costs associated with this process will be invoiced to the supplier.

**TRANSFER OF RESULTS**

The supplier may request transfer of certain test results for applicable relevant products from one lab when submitting samples to another test lab. For example, a supplier may request SGS lab to accept transfer of valid results from a previous BVCPS test report as long as those tests fall within **only** the categories below and are accompanied by appropriate documentation. In addition, the supplier should provide a letter of guarantee on company letterhead indicating that the product in testing is representative (same materials/process/facility etc.) to the item being sold to CVS.  The below timeframes will vary based on documentation in question, therefore, any questions on accepting test reports across labs should be discussed with CVS before accepting.

**All transfers from labs other than BV or SGS must be authorized by CVS.**

* LHAMA Review (valid for 5 years)
* TRA Review applicable to cosmetics, health & beauty products, toys (valid for 1 year)
* USP 51 (valid for 5 years)
* USP 61 (valid for 2 years)
* FCC (valid for 3 years)
* FDA (valid for 1 year)

The submitted documentation required may include a letter of declaration or copy of the test report stating that above tests were done with PASS results. The declaration letter or test report must be accompanied with the copy of the original toxicologist’s report providing the name and signature, ID # of the toxicologist, and list of ingredients or sample identification for which the transfer of results is requested (not required for FCC).

If the submitted Pass test report or the supporting documentation is determined to be incomplete based on the CVS Import Testing Program requirements, the test lab receiving the samples will inform the supplier and proceed to conduct the additional testing required to issue a valid COC. If necessary, additional samples will be requested. Once the additional testing is completed, the test lab will issue a new COC to the supplier.

**HOLD PROCEDURES**

Samples will be placed on “Hold” and testing will not be initiated under certain conditions including, but not limited to the following:

* If test lab does not receive the correct number of samples.
* If the Test Request Form is missing or incomplete
* If the supplier has a delinquent account reflecting outstanding balances with test lab beyond 30 days

When samples are placed on “Hold”, the testing lab will notify the supplier within one business day. If no response, then the testing lab will include the CVS QA Direct Import contact Debby.Dutch@cvshealth.com on any further email communication. If applicable, the manufacturers will then be responsible for supplying the lab with the additional samples or information required to initiate testing.

If an item is placed on hold due to missing EDI information, CVS will provide the testing lab with the information within one business day.

Testing will be initiated the day samples are released from “Hold” status. Test results will be available to CVS and the manufacturer within 24 hours of testing completion.

**Testing delays due to ‘on hold’ conditions caused by suppliers will not warrant an extension of the shipping window**.

**TURNAROUND TIME**

The turnaround time is noted on the last page of the protocol. Suppliers should not contact CVS or the test lab for results unless the due date has passed. Suppliers will be notified of test results by test lab on the report due date.

Test results in the form of a Certificate of Compliance (COC) or the Test Report will be available within six to seven business days after samples are either received at the laboratory or are taken off “Hold” status. The turnaround time may be extended for certain testing such as electrical and microbiological testing.

In the event “Rush Service” is requested, CVS and the manufacturer will receive results at the designated “Rush Service” turnaround time. Rush service levels include Next Two Days, Next Day and Same Day. Should same day service be required, the samples must be received at the laboratory before 10:00a.m. The supplier will be notified if a requested “Rush Service” cannot be honored by test lab. All Packaging/Labeling re-tests require Next 2 Day Rush Services at a minimum.

**REPORTS**

Test documentation in the form of a COC or a Test Report will be available within 24 hours of notification of the final test results. The COC or Test Report will be distributed as instructed by the supplier on the Test Request Form. **No booking of shipping appointments will be accepted without a valid COC by CVS’s freight forwarder Yusen Logistics.**

**INVOICING**

Suppliers are responsible for all testing charges incurred for samples submitted under the CVS Import Testing Program. New suppliers may be required to prepay for their initial submission. The testing lab will invoice the supplier at the conclusion of testing for each submission.

The general payment terms for both test labs are Net 30 days based on each supplier’s credit history. Should a supplier’s account become past due, samples will be placed on “Hold” status and both the supplier and CVS will be notified. CVS has agreed to assist the test labs in collecting payment from suppliers whose accounts are past due. The labs should contact the CVS QA Direct Import contact Debby Dutch at Debby.Dutch@cvshealth.com if further assistance is needed.

**CALIFORNIA PROPOSITION 65**

Suppliers are responsible for ensuring that their products meet CA Prop 65 requirements. CVS requires all products comply with all applicable Prop 65 settlement chemical content limits and will not accept products with California Prop 65 warning labeling unless labeling is required for all products regardless of formulation or measured chemical content. A complete list of the products and requirements can be obtained from the test lab by requesting the CA Prop 65 Supplemental Protocol. Additional information can be found on the CVS Supplier Portal.

**Related site links are listed below:**

California Attorney General:  <https://oag.ca.gov/prop65>

California Tableware Safety Information: <http://www.dhs.ca.gov/childlead/tableware/twregs.html>

California Code of Regulations: http://caselaw.lp.findlaw.com/cacodes/hsc.html (Note: go to chapter 9, look up Title Health and Safety Codes – Division 104, Part 3, Chapter 9, Sections 108850-108915)

California Flammability Requirements: <http://www.bhfti.ca.gov/industry/bulletin.shtm>l

California Proposition 65 Information, OEHHA:  <http://www.oehha.ca.gov>

Consumer Product Safety Commission: <http://www.cpsc.gov/businfo/reg1.html>

Code of Federal Regulations: <http://www.access.gpo.gov/nara/cfr/cfr-table-search.html#page1>

Federal Drug Administration: <http://www.fda.gov/ora/compliance_ref/cpg/cpgfod/>

Prop 65 Summary:  Proposition 65 - OEHHA (ca.gov)

**CVS & GOVERNMENT AGENCY REQUIREMENTS**

**CVS PHARMACY CTPAT REQUIREMENTS FOR PRODUCT SUPPLIERS**

The CVS Import Department sends out a copy of the CVS Pharmacy CTPAT Requirements For Product Suppliers to all new suppliers. The supplier is to agree to these requirements, sign and send back the last page of the document within seven business days.

The Agreement is to be signed only once unless:

* There are updates to your supply chain
* There are updates to the CTPAT program

The agreement states in part that the supplier:

“Agrees to develop and implement, within a framework consistent with the Customs Trade Partnership Against Terrorism (CTPAT) security criteria, a verifiable, documented program to enhance security procedures throughout its supply chain process, including, but not limited to, its manufacturing business partners. Where the Product Supplier does not exercise control of a production facility, transportation or distribution entity, or process in the supply chain, the Product Supplier agrees to communicate the CTPAT security criteria to its manufacturers and transportation/distribution service providers and, where practical, condition its relationships to those entities on the acceptance and implementation of the CTPAT security criteria.

“The Product Supplier agrees to communicate CVS Pharmacy, Inc.’s supply chain security and CTPAT procedures, and security criteria to its manufacturers in a documented and verifiable format that can be made available upon request, and it understands that failure to do so may jeopardize its business relationship with CVS Pharmacy, Inc.”

**FOOD AND DRUG ADMINISTRATION**

FDA is responsible for protecting the public health by assuring the safety, efficacy and security of human and veterinary drugs, biological products, medical devices, our nation’s food supply, cosmetics, and products that emit radiation. CVS will request additional information needed for FDA regulated items.

**US DEPARTMENT OF AGRICULTURE AND THE LACEY ACT**

The Lacey Act combats trafficking in “illegal” wildlife, fish, and plants. The 2008 Farm Bill (the Food, Conservation, and Energy Act of 2008), effective May 22, 2008, amended the Lacey Act by expanding the law banning commerce in illegally sourced plants and their products.

**Requirements:** The Lacey Act now, among other things, makes it unlawful to import certain plants and plant products. The Lacey Act requires a Plant and Plant Product Declaration form (PPQ 505) for all wooden/paper products that fall within the scope at the time of importation.

* Suppliers must submit a completed Plant and Plant Product Declaration Form with the commercial documents, or list the information on the commercial invoice by item

The PPQ 505 can be found at: <http://www.aphis.usda.gov/library/forms/pdf/ppq505.pdf>

The form must contain the following information:

1. The scientific name of the plant
2. Value of the importation
3. Quantity of the plant
4. The name of the country from where the plant was harvested.

For paper and paperboard with recycled content, the declaration must also include the percentage of recycled content. Declaration requirements and more information are located on the cvssuppliers.com website at:

<http://cvssuppliers.com/requirements/import-information> under “Lacey Act Info” and “Lacey Act Letter.”

**OZONE DEPLETING CHEMICALS**

The Internal Revenue Service (“IRS”) requires importers such as CVS to obtain specific documentation regarding the use of Ozone Depleting Chemicals (ODC) by its suppliers. CVS requests your cooperation in substantiating whether or not ODC were used to manufacture those certain products referenced within the Harmonized Tariff Schedule (“HTS”) numbers.

CVS will identify whether a supplier is providing products within certain HTS numbers. If and when such products are identified, the supplier will be contacted via a form letter. This letter will include the list of items sold to CVS and will address the IRS documentation requirements. The supplier must respond within 30 days from the date of the form letter. To further validate if ODC were or were not used in the manufacturing process, the following information will need to be provided:

* Identify the major cost component of each item and the name and country of the foreign manufacturer(s).
* Describe in detail the policy of the foreign manufacturer’s country, in response to the Montreal Protocol on Substances that Deplete the Ozone Layer, to encourage the reduction in production and use of ozone depleting chemicals. If the foreign manufacturer is not aware if their country’s policy, have them state that fact.
* Describe, in detail, the new alternative product of the replacement technology used instead of the ODC process. The description should include the type of equipment involved, the month and year the new technology was placed in service, and the name and address of the firm from whom the new technology was purchased.
* Provide documentation, including laboratory methodology, of any laboratory testing performed to verify the assertion that no ozone depleting chemicals are used in the manufacturing process, if applicable.
* English translation required for any response made in a foreign language.

Subsequent purchases of identified products made by CVS from the supplier MUST include all documentation as outlined above. Failure to comply with CVS requests for IRS documentation will result in review of CVS Supplier agreements and monetary consequence of applicable IRS Tax.