

NON-ORGANIC PRODUCT DECLARATION

USDA National Organic Program Compliance of Non-organic Ingredient or Processing Aid

Product: VITIBEN®

Manufacturer: Bentonite Performance Minerals LLC

Indicate whether the three statements for "All Products" are True or False. Then find the type of product that applies (citric acid, color, flavor, etc.), and indicate whether the statements are True or False for that product type.

The product indicated above conforms to the following criteria:

	True	False
<input type="checkbox"/> All Products		
1. No genetically engineered micro-organisms were used in production.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2. This product has not been irradiated.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
3. Sewage sludge was not used in production of the product or ingredients.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/> Citric Acid		
• Produced by microbial fermentation of carbohydrate substance.	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/> Colors		
• Derived from non-synthetic* source(s) only.	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/> Flavors		
• Derived from non-synthetic* source(s) only.	<input type="checkbox"/>	<input type="checkbox"/>
• No synthetic solvents or carrier systems were used in production.	<input type="checkbox"/>	<input type="checkbox"/>
• Does not contain any artificial preservative(s).	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/> Enzymes		
• Derived from edible, nontoxic plants, nonpathogenic fungi, or nonpathogenic bacteria.	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/> Yeasts		
• This yeast is non-synthetic*.	<input type="checkbox"/>	<input type="checkbox"/>
• No growth on petrochemical substrate and/or sulfite waste liquor.	<input type="checkbox"/>	<input type="checkbox"/>

The above statements regarding the above-named product produced by my company are true to the best of my knowledge, and are based on information provided by our supplier or vendor.

Charles Vandy Technical Director
 Name (please print) Title/Department

[Signature] 3/31/2011
 Signature Date

*Nonsynthetic (natural). A substance that is derived from mineral, plant, or animal matter and does not undergo a synthetic process as defined in section 6502(21) of the Act (7 U.S.C. 6502(21)). For the purposes of this part, nonsynthetic is used as a synonym for natural as the term is used in the Act.

*Synthetic. A substance that is formulated or manufactured by a chemical process or by a process that chemically changes a substance extracted from naturally occurring plant, animal, or mineral sources, except that such term shall not apply to substances created by naturally occurring biological processes.



April 1, 2011

Dear Customers and Stakeholders:

Bentonite Performance Minerals LLC produces natural sodium bentonite products located in the State of Wyoming to specifications accepted at purchase by its customers (see attached). Among these products, BPM produces a leading wine clarifier called VITIBEN®. BPM confirms the following about VITIBEN®:

1. This product is manufactured without the addition of any gluten containing additives; i.e., it is completely gluten-free at its point of sale
2. There are no organic additives of any type added to VITIBEN® during its manufacture by BPM
3. BPM is ISO 9002 certified and API certified. Both of these 3rd party certifications require 3rd party annual audits to maintain the certifications, and I hereby confirm that BPM is in good-standing with both organizations.

Feel free to contact me with any questions on this matter.

Respectfully,



Charles R. Landis, Ph.D.
Technical Director
Halliburton Industrial Drilling Products
3000 North Sam Houston Parkway East
Houston, TX 77032-3219
281-871-7915 (o)
281-871-5936 (f)
charles.landis@halliburton.com



April 1, 2011

Dear Customers and Stakeholders:

Bentonite Performance Minerals LLC produces natural sodium bentonite products located in the State of Wyoming to specifications accepted at purchase by its customers (see attached). Among these products, BPM produces a leading wine clarifier called VITIBEN®. BPM confirms the following about VITIBEN® as it relates to major food allergen reporting. As classified to the Section 201 and as amended in section 102(b) a major food allergen is defined as:

(1) Section 201 of the Federal Food, Drug, and Cosmetic Act (21 U.S.C. 321) (as amended by section 102(b)) is amended to define the term 'major food allergen' as the following:

1. `(1) Milk, egg, fish (e.g., bass, flounder, or cod), Crustacean shellfish (e.g., crab, lobster, or shrimp), tree nuts (e.g., almonds, pecans, or walnuts), wheat, peanuts, and soybeans.
2. `(2) A food ingredient that contains protein derived from a food specified in paragraph (1), except the following:
 1. `(A) Any highly refined oil derived from a food specified in paragraph (1) and any ingredient derived from such highly refined oil.
 2. `(B) A food ingredient that is exempt under paragraph (6) or (7) of section 403(w)."

In my role as Technical Director for Bentonite Performance Minerals LLC, I can confirm that VITIBEN® is not manufactured with or does not contain any of these components.

Feel free to contact me with any questions on this matter.

Respectfully,



Charles R. Landis, Ph.D.

Technical Director

3000 North Sam Houston Parkway East

Houston, TX 77032-3219

281-871-7915 (o)

charles.landis@halliburton.com



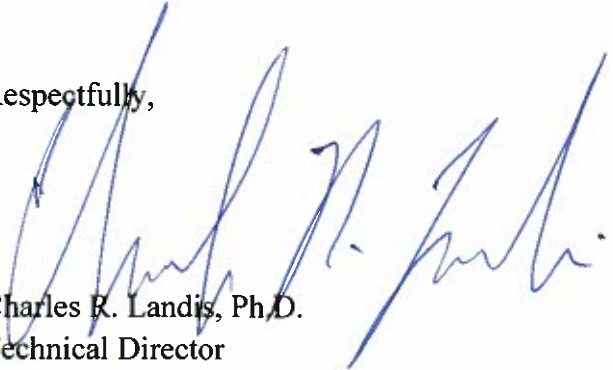
April 1, 2011

Dear Sir or Madam:

Bentonite Performance Minerals (BPM) LLC produces a natural sodium Bentonite product called VITIBEN® for beverage clarification, including wine clarification. I certify that the manufacturing process at the BPM manufacturing facilities does **not** include any exposure to irradiation other than natural sunlight. VITIBEN® is **not** irradiated in any form by mechanical or spectroscopic means by BPM and never has been in the past.

Feel free to contact me with any questions on this matter.

Respectfully,



Charles R. Landis, Ph.D.
Technical Director

Halliburton Industrial Drilling Products
3000 North Sam Houston Parkway East
Houston, TX 77032-3219
281-871-7915 (o)
281-871-5936 (f)
charles.landis@halliburton.com



BENTONITE

Performance Minerals LLC

3000 N. Sam Houston Parkway E
Houston, Texas 77032

(281) 871-7900
Fax (281) 871-7940

Website: www.bentonite.com

Dear Valued Customer and Stakeholder:

This letter documents the status of VITIBEN® as Generally Regarded As Safe (GRAS) as outlined below by the Food and Drug Administration (FDA) in Chapter I, Part 184, paragraph 1155. It is also identified as a processing aid with this GRAS classification (as below). For your records, the FDA statement in its current form known to me is accurate in its complete form for your reference. I further declare that Bentonite Performance Minerals LLC does not add gluten or any organic compounds to the VITIBEN® product at its manufacturing plant in Wyoming.

CHAPTER I--FOOD AND DRUG ADMINISTRATION, DEPARTMENT OF HEALTH AND HUMAN SERVICES (CONTINUED)

PART 184 DIRECT FOOD SUBSTANCES AFFIRMED AS GENERALLY RECOGNIZED AS SAFE--Table of Contents

Subpart B_Listing of Specific Substances Affirmed as GRAS

Sec. 184.1155 Bentonite.

(a) Bentonite ($Al_2O_3 \cdot 4SiO_2 \cdot nH_2O$, CAS Reg. No. 1302-0978-099) is principally a colloidal hydrated aluminum silicate. Bentonite contains varying quantities of iron, alkalies, and alkaline earths in the commercial products. Depending on the cations present, natural deposits of bentonite range in color from white to gray, yellow, green, or blue. Bentonite's fine particles provide large total surface area and, hence, pronounced adsorptive capability.

(b) FDA is developing food-grade specifications for bentonite in cooperation with the National Academy of Sciences. In the interim, the ingredient must be of a suitable purity for its intended use.

(c) In accordance with Sec. 184.1(b)(1), the ingredient is used in food with no limitation other than current good manufacturing practice. The affirmation of this ingredient as generally recognized as safe (GRAS) as a direct human food ingredient is based upon the following current good manufacturing practice conditions of use:

[[Page 50]]

(1) The ingredient is used as a processing aid as defined in Sec. 170.3(o)(24) of this chapter.

(2) The ingredient is used in food at levels not to exceed current good manufacturing practice. Current good manufacturing practice results in no significant residue in foods.

ISO 9001:2000 Registered QMS

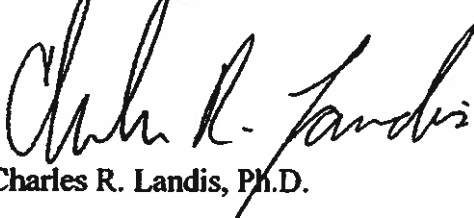


(d) Prior sanctions for this ingredient different from the uses established in this section do not exist or have been waived.

[47 FR 43367, Oct. 1, 1982]

This letter affirms that the natural sodium bentonite, "Wyoming", bentonite produced by Bentonite Performance Minerals LLC at its Colony and Lovell, Wyoming manufacturing facilities is not genetically modified or biologically engineered in any manner.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Charles R. Landis". The signature is written in a cursive, flowing style.

Charles R. Landis, Ph.D.

Technical Director

Bentonite Performance Minerals LLC

3000 North Sam Houston Pkwy East

Houston, TX 77032



CERTIFICATE OF REGISTRATION

This is to certify that

BENTONITE Performance Minerals LLC

554 US Highway 212, Colony, Wyoming 57717 USA

operates a

Quality Management System

which complies with the requirements of

ISO 9001:2008

for the following scope of registration

The registration covers the Quality Management System for the mining, processing and manufacturing of bentonite products.

Certificate No: CERT-0044643
File No: 800178
Issue Date: March 24, 2010

Original Certification Date: December 14, 1995
Current Certification Date: April 28, 2010
Certificate Expiry Date: April 27, 2013

Chris Jouppi
President,
QMI-SAI Canada Limited

Alex Ezrakhovich
General Manager,
SAI Global Certification Services Pty Ltd



ISO 9001

Registered by:
SAI Global Certification Services Pty Ltd, 286 Sussex Street, Sydney NSW 2000 Australia with QMI-SAI Canada Limited, 20 Carlson Court, Suite 100,
Toronto, Ontario M9W 7K6 Canada (SAI GLOBAL). This registration is subject to the SAI Global Terms and Conditions for Certification. While all due care
and skill was exercised in carrying out this assessment, SAI Global accepts responsibility only for proven negligence. This certificate remains the property
of SAI Global and must be returned to them upon request.
To verify that this certificate is current, please refer to the SAI Global On-Line Certification Register www.qmi-saiglobal.com/qmi_companies/

 **SAI GLOBAL**
INFORM. INSPIRE. IMPROVE.