PRODUCT STEWARDSHIP CODE
Acknowledgements
Product Stewardship Code Task Force 03

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Introduction

History of Responsible Care®
In December 2009, the Gulf Petrochemicals and Chemicals Association (GPCA) Board of Directors formally adopted the Chemical Industry’s initiative called ‘Responsible Care®’.

Responsible Care was created in 1984 by the Canadian Chemical Producers’ Association, with the clear intent of establishing the following goals:
• Improved chemical processes
• Enhanced practices and procedures
• Reduction of every kind of waste, accident, incident, and emission
• Reliable communication and dialogue
• Heightened public scrutiny and input

Responsible Care® has become an obligation of membership in GPCA Member Companies. A central idea behind Responsible Care® is that implementing it will never be complete. It is not a program that provides a checklist of activities for member companies to implement. It will be improved continually in light of new information, new technology, new expectations, and a constant reassessment of performance and objectives. Responsible Care® is a way of doing business.

Management Codes
Responsible Care® is underpinned by GPCA through the implementation of a number of Management Codes as indicated below.

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<tr>
<th>Management Code</th>
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<td>Community Awareness and Emergency Response (CAER)</td>
<td>GPCA-RC-C01</td>
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<td>Distribution</td>
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<td>Process Safety</td>
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<tr>
<td>Environmental Protection</td>
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Each of the above Codes includes technical processes called Management Practices. The Management Practices provide specific technical requirements and guidance for Companies to fulfil their responsibilities in terms of Responsible Care® and can be used as a self-assessment tool.
**Objective – Product Stewardship Code**
The purpose of the Product Stewardship Code is to make health, safety and environmental protection an integral part of designing, manufacturing, marketing, distributing, using, recycling and disposing of our products. The Code provides guidance as well as a means to measure continuous improvement in the practice of product stewardship.

The scope of the Code covers all stages of a product’s life. Successful implementation is a shared responsibility. Everyone involved with the product has responsibilities to address society’s interest in a healthy environment and in products that can be used safely. All employers are responsible for providing a safe workplace, and all who use and handle products must follow safe and environmentally sound practices.

The Code recognizes that each company must exercise independent judgment and discretion to successfully apply the Code to its products, customers and business.

This Code is composed of Management Practices as indicated in Table 1 – Product Stewardship Management Practices. Individually, each Practice describes an activity or approach to implementing the requirements of this Code.

The implementation of Product Stewardship Code will help in fulfilling the requirements of the Responsible Care® management system specification RC 14001. Notably, the implementation will help in closing gaps related to Product Stewardship requirements of the specification, particularly those requiring a system to facilitate the flow of hazard information to all elements of the value chain.
Wherever possible these Management Practices should be included in the member company’s existing programs which address the Hazard Communication related requirements. More so, these practices should be incorporated into the existing programs in such a way that these are part of the regular management review cycle.

Chapter 2 includes the Management Practices along with guidance, suggested activities / examples and self-assessment notes which can be used as a self-assessment tool to assist member companies identify gaps and an effective implementation plan to address those gaps.
CHAPTER TWO

Management Practices, Guidance, Suggested Activities / Examples and Self-assessment

Management Practice: ST-1

Leadership by senior management through policy development, participation, communications and resource commitments to establish and maintain an effective Product Stewardship program

1.0 Guidance
The objective of this Management Practice is to set the driving force for the Product Stewardship Code. To this end, senior management must first adopt a policy that reflects the company’s vision of product stewardship. This policy should state clearly how senior management expects product stewardship to be managed within the company.

To be effective, the policy should emphasize that product stewardship, like quality and EHS&S, must be woven into the company’s culture. It also should be clear that the commitment is an ongoing, long-term part of the company’s operations and business.

1.1 Suggested Activities / Examples

Example No. 1
Establish a formal corporate Product Stewardship policy that describes your company’s Product Stewardship philosophy and mission or integrate Product Stewardship program needs into existing policies such as Health, Safety and Environmental policies.

Example No. 2
Benchmark and collect information on other companies’ Product Stewardship policies in preparation for your own company’s policy development. Distribute the policy to key internal stakeholders and gather feedback during development. Seek approval of the final policy draft from the corporate board of directors.

Example No. 3
Communicate policy to all employees to make them understand their responsibilities, management’s expectations for employees, the role they play in incorporating the Product Stewardship Code and to listen and respond to employee’s feedback and address their concerns. Display policy(s) with other important company policies and review policy(s) periodically, as appropriate. Develop guidelines to help each business group or corporate functional area implement the policy.

Example No. 4
Form committees or task forces, where appropriate, to determine organizational changes that are required to manage Product Stewardship requirements.

Example No. 5
Create a Corporate or Business Level(s) Stewardship organization with well-defined roles. Establish levels of authority for making Product Stewardship related decisions. Establish a global team, if required, to optimize interactions with regional authorities and customers. Emphasize hiring
professionals with Product Stewardship expertise or with the required backgrounds to quickly learn necessary content. Clearly define Product Stewardship responsibilities in job descriptions.

**Example No. 6**
Commit adequate resources to sustain continual improvement in Product Stewardship.

**Example No. 7**
Senior management regularly attends meetings that discuss key Product Stewardship activities as well as to participate in review and comment on key company Product Stewardship goals, progress and performance, and review relevant legal issues or concerns with legal counsel.

**Example No. 8**
Establish procedures for incorporating Product Stewardship considerations into the evaluation of business decisions. Periodically review these guidelines and procedures.

### 1.2 Self-assessment

- Has the company senior management endorsed a written Product Stewardship policy and published clear directions and expectations for the implementation of policy?
- Are these expectations translated into specific overall objectives for each significant area (Life Cycle Stages)?
- Are the agreed Product Stewardship plans endorsed formally by the senior management and communicated widely?
- Are regular reports prepared on progress towards the individual and team goals of the Product Stewardship plan, at a frequency appropriate to the product risk and need for improvement?
- Are self-assessments on Product Stewardship Code compliance completed and forwarded to GPCA annually by the due date?
- Does the company provide required or requested data in public reporting of industry performance?
- Are the procedures and records of the implementation necessary to meet the requirements of this Code in place?

**Management Practice: ST-2**

Clear accountability of goals and responsibilities for implementing Product Stewardship throughout the organization. Measure performance against these goals and ensure continuous improvement.

### 1.0 Guidance

One of the key ways senior management can convey the importance of product stewardship is by establishing it as a priority in business planning and individual performance planning. The objective is to develop a process that will result in continuous improvement through goals that are well-defined, achievable and measurable. Similarly, individual responsibilities should be clear and consistent.

### 1.1 Suggested Activities / Examples

**Example No. 1**
Define specific, measurable, agreed upon, realistic and time-based (SMART) goals and objectives of major Product Stewardship programs. Define goals, short-term and long-term, for measuring external customer response to Product Stewardship related needs and establish systems or processes to support them.
Example No. 2

Develop key performance indicators on action plans that can trigger management commitment as well as individuals / departments who have Product Stewardship responsibilities. Ensure performance to Product Stewardship objectives and continuous improvement are tied to key responsible parties and compensation criteria.

Example No. 3
Develop a classification scheme for Product Stewardship related incidents and implement a reporting, recording and analysis process.

Example No. 4
Establish a performance measurement and reporting mechanism that allows monitoring and review of the progress of Product Stewardship programs implementation against goals for internal and external communications throughout the year. Develop a monthly or quarterly monitoring scheme, e.g., internal audits, appraisals to review progress of the various Product Stewardship programs and commitments. Performance can be communicated in key messages on intranet / website, newsletters, bulletin boards, company’s annual report and/or sustainability report etc.

1.2 Self-assessment
• Is there a process for management to set goals, e.g., energy efficiency, education for employees, product safe handling training for customers etc.?
• Do job descriptions (or equivalent), where appropriate, include responsibilities for contributing towards Product Stewardship programs throughout the company?
• Is an overall coordinator / champion appointed for Product Stewardship established and, if practicable, a network of ‘product stewards’ or equivalent for each significant business sector as appropriate (based on product risk, size and complexity of the business)?
• Does a regular assessment (at least every two years) take place on the extent of implementation of the agreed systems and procedures for Product Stewardship? This could be part of an overall review of an integrated management system, but must place specific emphasis on Product Stewardship.
• Are the results of these assessments reported to the appropriate level of senior management?
• Is a system in place for assessment of system, reporting findings and appropriate corrective action?

Management Practice: ST-3
Commitment of resources necessary to implement and maintain Product Stewardship programs

1.0 Guidance
The commitment of resources, both human and financial, is a critical signal that management can send to demonstrate its commitment to Product Stewardship practices and is a vital component for some implementation activities. Undoubtedly, resources will vary from company to company. However, in all cases, the commitment of resources should be consistent with Product Stewardship implementation plans and sufficient to support continuous improvement.

1.1 Suggested Activities / Examples
Example No. 1
Establish annual resource commitments and plans to meet overall yearly Product Stewardship
goals and objectives. Determine if advocacy plans are required and account for these needs.

**Example No. 2**
Ensure sufficient manpower, financial resources, IT and communication systems to implement and maintain Product Stewardship programs. Identify Product Stewardship training needs and allocate funding for these costs.

**Example No. 3**
Ensure that the proper systems, infrastructure or outsourcing plan is in place that meets current needs and can grow to meet future expectations, plans, and requirements.

### 1.2 Self-assessment
- Is there a process for management to determine appropriate level of resources (people and financial)?
- Does the senior management regularly assess, provide and document the resources necessary for employees, e.g., skills, training, and experience to implement Product Stewardship in accordance with policy and management directives, in proportion to product risk?
- Are product steward(s) identified and trained?

**Management Practice: ST-4**
Identify and maintain information on Health, Safety and Environmental hazards and reasonably foreseeable exposures from new and existing products

### 1.0 Guidance
Company should have an ongoing process to gather and review existing Health, Safety and Environmental (HSE) information to determine if it is accurate, current and complete. Sources of information may include published and unpublished internal reports, product use, customer feedback / surveys and sales and marketing personnel observations at customer’s site etc.

### 1.1 Suggested Activities / Examples

**Example No. 1**
Identify sources of information for new products, such as:
- Material Safety Data Sheets (MSDS) and labels of raw materials from suppliers.
- Governmental regulatory requirements.
  E.g., Organisation for Economic Cooperation and Development (OECD) / Screening Information Data Sets (SIDS) dossiers.
- Databases.
  E.g., Integrated Risk Information System (IRIS), European Chemical Substance Information System (ESIS).
- Reference books.

Identify types of tests to be conducted, such as toxicological, eco-toxicological, physical and chemical properties. Identify potential use and misuse of product as well as reasonably foreseeable exposures. Identify applicable legislations / standards requirements and restrictions. Be aware of public concerns, industry or company’s voluntary commitments and company’s standards. Work with relevant functions to generate the types of product tests and obtain data needed for HSE review. Develop a checklist of HSE information to be gathered to adequately characterize and
manage HSE aspects of product risks. Review and compile information gathered to ensure that it is accurate, current and complete.

Example No. 2
Communicate HSE information to employees, customers, distributors in the form of product Safety Data Sheets, product labels, bulletins, product manuals, safety wall charts, seminars, training, etc.

Example No. 3
Consider developing a centralised information database, e.g., SAP for managing HSE information gathered that can also serve as a platform for information sharing as well as a valuable resource. Control and monitor access to confidential information.

Example No. 4
For existing products, maintain awareness of new developments in the health, safety, and environmental field, e.g., applicable legislation by attending conferences and meetings, reading journals, and talking with peers inside and outside the company. Consider subscribing to external service providers that provide periodic updates of regulatory developments, scientific publications and findings, etc.

Example No. 5
Conduct surveys. Obtain feedback from employees, customers and distributors on the use and misuse of products, the HSE problems they may have encountered in handling, use or disposal of your products, including adverse effects, impacts, actual problems and near misses.

Example No. 6
Consider developing guidance for evaluating the significance of new HSE information. New HSE information may justify the revision of a Safety Data Sheet or product label, preparation of a new warning or even implementing a product recall. Previously prepared guidance can help instruct when such an activity is needed and may limit inefficient case-by-case responses. Update HSE information as necessary in databases and distribute new information to all stakeholders.

1.2 Self-assessment
- Do all existing products have information that is up-to-date and available, which includes the results of testing including animal or human toxicity, eco-toxicity and chemical and physical properties that affect exposure or environmental impact?
- Is exposure information established and maintained?
- Does a procedure or process exist for obtaining exposure information from end-user and manufacturing communities?
- Have all new products’ test results been determined before commercialisation, including animal or human toxicity, eco-toxicity and chemical and physical properties that affect exposure or environmental impact?

Management Practice: ST-5
System to characterize and re-evaluate risk for new and existing products based on health, safety and environmental hazards and reasonably foreseeable exposure information.
1.0 Guidance
Make use of HSE information gathered to characterize product risk (quantitative and qualitative). Re-evaluate risk if:
- New information becomes available, e.g., new markets, new uses or misuses.
- There are changes to:
  i. Production process
  ii. Product composition
  iii. Applicable regulations or standards.
Product risk characterization information will provide the basis for product Safety Data Sheets.

1.1 Suggested Activities / Examples

Example No. 1
Develop a procedure for product risk characterization that would define roles and responsibilities. Identify information required for product hazard identification, product toxicity / eco-toxicity assessment, product exposure assessment, creation of Hazard Ratings and Exposure Ratings tables, Risk Matrix and Risk Characterization methodology. Identify situations when re-evaluation is required and review the procedure where appropriate.

Example No. 2
Consider developing databases, e.g., applicable regulations, standards, toxicology, eco-toxicology assessment reports, to support product risk characterization needs.

Example No. 3
Conduct product risk characterization during product development stage. Form a multi-disciplinary team that should include Research & Development (R&D), HSE, Sales & Marketing staff to participate in product risk characterization. External experts may be included in the team as required. Evaluate the adequacy of information gathered to determine for example, whether additional tests are needed. Consider developing a checklist of questions to be answered that can be helpful. Assign Hazard Ratings and Exposure Ratings and determine risk level based on the Risk Matrix. Document the product risk characterization clearly so that it can be easily integrated into subsequent risk management activities, updating, and required disclosures.

Example No. 4
Train relevant staff, who would be involved in risk characterization, to be familiar with the methodology and to understand their roles and responsibilities.

Example No. 5
Product risk characterization should be re-evaluated periodically or whenever there is new information available, changes to production process, changes to product composition, changes to applicable regulations / standards, incidents related to product handling, use, transportation, disposal etc. as well as new markets and uses. Incorporate knowledge of current products and processes, and employee’s, customer’s and distributor’s feedback when conducting a re-evaluation. Record the basis for technical decisions made in process design and provides support in reviewing the basis for decisions. Before adopting product specifications or process changes, consider how they may alter product properties, use or quality.
1.2 Self-assessment

- Is there a process in place for hazard characterization and exposure assessment?
- Is there a procedure in place for conducting a HSE risk assessment based on hazard and exposure information?
- Is the procedure used on existing products and known uses?
- Is the procedure used on new products prior to commercialization?
- Do consultation processes take place between business, technical and HSE specialists for risk assessment, particularly during product planning and development?
- Are results of risk assessments documented and relevant outcomes communicated to stakeholders?
- Is a periodic assessment of the risk carried out, taking into account changes in processes or product use and emerging environmental and health science?

Management Practice: ST-6
Develop a system to identify, document and implement health, safety and environmental risk management actions

1.0 Guidance
Company should manage the risk involved in production and use of chemicals based on product risk characterization. Risk management actions to be weighed should be based on technical, ethical, societal and business issues surrounding the product. Risk actions taken can range from no action, providing Safety Data Sheets and/or labels, to reformulation or removal from market.

1.1 Suggested Activities / Examples

Example No. 1
Identify high risk items as determined from Product Risk Characterization as priority to look into possible measures to reduce risk to As Low As Reasonably Practicable (ALARP) levels. Propose and select Risk Management actions in the following order of hierarchy:
- Elimination; e.g., do not manufacture product, removal from market.
- Substitution; e.g., review composition of product to substitute hazardous component with a less hazardous component.
- Engineering controls; e.g., ventilation.
- Administrative controls; e.g., development of safe working procedures.
- Personal Protective Equipment; e.g., recommendations for goggles, gloves, etc.

Consider establishing exposure limits and guidelines or consistent risk threshold criteria. Benchmark against trends in similar industries.

Personnel involved in Product Risk Characterization should also be involved in discussion of Risk Management actions.

Example No. 2
Consider establishing task forces with R&D, HSE and manufacturing staff to focus on areas of special concern. Form a committee that can foster the product stewardship actions. Follow up on actions to and confirm satisfactory completion of actions.
Example No. 3
Communicate product risk information to employees, customers and other direct product receivers through training, provision of Safety Data Sheets, product labels etc.

Ask customers and distributors about their needs for additional information and guidance on proper product use or handling, e.g., their uncertainties of disposal methods or their safety expertise, etc. Train staff on appropriate responses to challenges from customers and the public.

Example No. 4
Determine legal reporting requirements (if any) for product as well as evaluate compliance with regulations / standards. Work with legal counsel, manufacturing and other areas to develop and execute strategies to address legal requirements.

Example No. 5
Document the analysis of risk management decisions with a risk assessment form. Document in a way that protects the trade secrets and propriety information. Consider use of a computerized system to assist in documentation. Assess this document as a part of an audit.

Example No. 6
Review risk management actions periodically or whenever there is new information available, changes to production process, changes to product composition, changes to applicable regulations / standards, incidents related to product handling, use, transportation and disposal etc. Incorporate knowledge of current products and processes and employee’s, customer’s and distributor’s feedback when conducting a review.

1.2 Self-assessment
- Are systems in place for identifying and keeping up to date on legal requirements in all countries in which business is conducted?
- Do company representatives actively participate in industry processes to assist in developing appropriate new laws?
- Do company representatives participate actively in industry and technical forums to keep up to date on best practices and share experiences?
- Are the risk management actions appropriate to the product risk identified, including but not limited to the following?
  i. New products
  ii. New distribution channels or markets
  iii. New intended use
  iv. Sales into a new / different market segment
  v. Change in product ingredients or formulation
  vi. New or changed production process
  vii. New safety, health or environmental information
  viii. Change in legal requirements
  ix. Discontinuing sale of product.
- Are risk management actions documented, implemented and reviewed?
- Is information provided in a convenient and usable form including Safety Data Sheets (SDS) and labels?
- Are SDS prepared and updated consistent with legal requirements and relating to the best available information?
• Are product packaging and labels reviewed periodically for consistency with the SDS and with legislative requirements?

**Management Practice: ST-7**

Design, develop and improve products and processes with a system to identify health, safety and environmental impacts throughout the product lifecycle

**1.0 Guidance**

The health, safety and environmental attributes of the product throughout its entire lifecycle should be addressed at the beginning, during the concept and design (or redesign) phases. Re-evaluation should occur on a periodic basis or whenever changes to the product or process are contemplated. Insights and contributions from employees in all functional areas that may affect health, safety and the environment should be incorporated into the review. These functional areas include R&D, Manufacturing, Distribution, Sales & Marketing and Product Stewardship.

The need for proper energy and natural resource utilization should also be addressed, as they are important considerations for reducing potential adverse environmental impacts and achieving sustainable development.

**1.1 Suggested Activities / Examples**

**Example No. 1**

Establish and document a process to review and evaluate product and process design at key stages of development for new and for existing products. Form a multi-disciplinary team to conduct Life Cycle Analysis (LCA) of products to identify potential health, safety and environmental impacts and possible risk reduction opportunities. Team members should have representatives from R&D, Procurement, Sales & Marketing, Manufacturing, Distribution, HSE and Product Stewardship. Develop a questionnaire or checklist of questions and propose a series of activities for each stage of product development. Make a decision at the end of each stage whether to proceed to the next stage or to modify the product or processes and repeat the current stage or to terminate further activity with respect to the product or process change.

**Example No. 2**

During product conception, gather HSE information of raw materials, intermediates and product, as well as the intended use / users of product, potential production volume and targeted markets. Make preliminary HSE assessments against customer’s requirements and company’s policy as well as regulatory compliance assessments, e.g., chemical notification / permits. Public concerns (if any) should also be taken into consideration during the design of products and processes. Identify any HSE, regulatory, societal, issues, concerns, requirements and effects associated with the new product throughout the product’s life cycle. Conduct training for R&D, Manufacturing, Sales & Marketing staff to design products and processes to underscore Product Stewardship objectives.

**Example No. 3**

During product process development, gather more HSE information of raw materials, intermediates and product, e.g., physical / chemical properties data, toxicological, eco-toxicological data. Make HSE assessments, e.g., manufacturing, storage, distribution issues and considerations, product risk characterization and risk management actions as well as regulatory compliance assessments, such as restrictions on use of certain chemical substances. Prepare product HSE documents such as
Safety Data Sheets, product labels. Systematically analyse each process waste, i.e., routine scrutiny of opportunities to reduce energy consumption, recycle by-products, or reduce environmental impacts resulting from processing. Design specifically to minimize waste, by-products and emissions resulting from use of the product or make product or process modifications to reduce or eliminate by-products and wastes. Consider potential health, safety and environmental impacts as important criteria when selecting production equipment and determining the best practices to manufacture the product. Consider the need for Product Stewardship training for employees and/or customers.

Example No. 4
After product has been commercialized, educate and train customers regarding regulations as well as safe and effective product use, recycling and disposal. Evaluate ability and willingness of contract manufacturers, distributors and customers to use products appropriately, according to the degree of product risk. Monitor and evaluate product’s health, safety and/or environmental impacts, e.g., potential emissions, human exposures and identify impact reduction through life cycle evaluation of raw materials, processes and products. Establish systems to anticipate and respond to significant changes throughout the product’s commercial lifetime, e.g., market change, customer applications, process, manufacturing sites and regulations. Review and update product risk characterization and risk management actions as appropriate. Review product HSE documents such as Safety Data Sheets periodically and modify product labels as required. Inspect and maintain product-manufacturing operations so that production equipment will operate as designed under original specifications and do not pose health, safety, and environmental risks by the production of unanticipated by-products or contaminants.

Example No. 5
During post commercialization, gather and evaluate feedback on employee’s, customer’s and distributor’s suggestions for improvement in product and process design. Make modifications to the product and/or process, as appropriate. Sales & Marketing staff can hold meetings with customers to discuss product improvements or modifications under consideration. Consider HSE impacts on the process and on end product composition resulting from changes in processes. Review specifications to consider whether minor components that could pose health, safety, and environmental impacts are included in the specifications. Determine if there are any new uses / misuses for the product and take steps to stop or prevent misuses that could result in potential harm to humans or the environment. Review and update product risk characterization and risk management actions as appropriate based on new information obtained, e.g., new hazard data, new uses / misuses etc. Provide additional guidance and training, as appropriate. Identify new marketing opportunities and potential concerns. New company standards for product and container design could be developed in an attempt to minimize adverse impacts. Establish waste reduction programs to systematically analyse each process waste. For example, a review program could routinely scrutinize opportunities to reduce energy consumption, recycle by-products, or reduce environmental impacts resulting from processing. Establish a review system for evaluating the net impact of proposed product or process modifications. Look for product or process modifications to reduce or eliminate by-products or wastes.

Example No. 6
Consider working with management to put an incentive system in place for employee suggestions for product improvements.
1.2 Self-assessment

- Are business groups directly involved with Product Stewardship in reducing HSE impacts (including the use of energy and natural resources) during product and packaging design and development, including manufacturing and waste management processes for new and improved products?
- Are processes in place for review of HSE impacts as part of a decision on commercialization?
- Are business and technical groups aware of the need for and current level of compliance with the Manufacturing Process Safety, Employee Health and Safety and Environmental Protection Codes, particularly for high-risk products?

Management Practice: ST-8

Educate and train employees as well as to have an employee information feedback system

1.0 Guidance

All employees who are involved with products must have the education and training necessary to understand product (and packaging) hazards, proper use, handling, reuse, recycling and disposal procedures.

A feedback system must exist for employees to report new uses, misuses, adverse effects and other Product Stewardship concerns.

Timely feedback of health, safety or environmental information or concerns into the risk characterization process (Management Practices 4 and 5) is essential as this feedback may change the risk management actions (Management Practice 6).
1.1 Suggested Activities / Examples

Example No. 1
Establish education and training programs tailored to specific job functions. Training needs can be identified with the aid of a training matrix. An example is shown in the table below:

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<tr>
<th>Training Programs</th>
<th>Functional Group</th>
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<tbody>
<tr>
<td></td>
<td>R&amp;D</td>
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<tr>
<td>Product and Process Design</td>
<td>X</td>
</tr>
<tr>
<td>Product Risk Characterization</td>
<td>X</td>
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<tr>
<td>Product Risk Management</td>
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<td>Product Hazards / Risks</td>
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<td>Product Use(s) / Misuse(s)</td>
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<td>Product Storage &amp; Handling</td>
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<tr>
<td>Product Recycling / Disposal</td>
<td>X</td>
</tr>
<tr>
<td>Product Applicable Regulations</td>
<td>X</td>
</tr>
<tr>
<td>Product Feedback System</td>
<td>X</td>
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Training should be part of new employee orientation and should become a basic job requirement for the employee. Support from Human Resource, Training and Communications Departments may be required. Refresher training should be conducted at appropriate intervals or when new information becomes available. Knowledge gained from training could be passed onto customers through Sales & Marketing staff and/or Product Steward. Feedback from employees can be sought during training programs.

Example No. 2
Develop mechanisms and opportunities for feedback from employees for reporting new uses, misuses, adverse effects, reasonably foreseeable exposures, handling, recycling/disposal methods etc.; in particular, employees who have contact with customers, i.e., Sales & Marketing staff. Sales & Marketing staff can observe product use and provide feedback on new uses or any possible misuses of products and to solicit customer feedback on product use during customer visits. They can also inquire whether customer’s employees are receiving and understanding information and
recommendations provided by your company with respect to product risks, storage and handling. A set of questions to be asked can be prepared to assist Sales & Marketing staff.

**Example No. 3**
Product Steward meets as needed with HSE, R&D, Sales & Marketing and Distribution staff as a means to obtain and relay employee feedback. Maintain awareness and understanding of what all the job functions are doing to meet product stewardship goals through such meetings. Use these meetings as an opportunity to educate staff on products, to determine further needs and to keep them informed about customer feedback.

**Example No. 4**
Gather feedback from employees and prepare communication materials in the form of videos, circulars, memos, articles in company’s internal newsletter, bulletin boards etc. to be disseminated to all concerned parties. Employees who are aware of public’s or external organizations’ perception of product should also channel their feedback through the system.

**1.2 Self-assessment**
- Are employees trained on potential hazards in the product or manufacturing process during new or modified product development and start-up?
- Are key personnel trained in the overall product risk management system?
- Do routine training programs for all products and processes include handling, recycling and disposal of products and product wastes?
- Does a feedback mechanism exist within the company for reporting new uses, misuses, adverse effects and other Product Stewardship concerns?

**Management Practice: ST-9**
Use contract manufacturers who have sound health, safety and environmental practices for the specific operations under contract

**1.0 Guidance**
Companies are responsible for assessing the capabilities of each contract manufacturer and for supplementing their expertise with enough guidance to promote proper handling (including storage), use and disposal; according to the degree of product risk.

If contract manufacturers are unwilling to implement appropriate controls, a company may decide to cease doing business with them.

**1.1 Suggested Activities / Examples**

**Example No. 1**
Participate in the selection process of potential contract manufacturers by reviewing health, safety and environmental practices related to the service under contract and evaluate the results and influence the selection of contract manufacturers.

Your company may have an existing procedure for the selection of on-site contractors that could be modified for this purpose.
Example No. 2
Provide health, safety and environmental related information of product(s) as well as technical assistance and expertise on HSE matters to contract manufacturers, according to the product risk level through meetings, workshops, procedural and product documents etc.

Example No. 3
Conduct periodic reviews of current contract manufacturers on their health, safety and environmental capabilities and performance through site visits of the contract manufacturers’ facilities and/or surveys as well as to review procedures and ensure adherence to health, safety and environmental standards related to the contracted service that should be included as a requirement in contracts with manufacturers. Such reviews can also help in the (re)selection of contract manufacturers and to improve their performance, as well as the achievement of appropriate health, safety and environmental standards.

1.2 Self-assessment
• Are the background knowledge, facilities and procedures of contractors assessed based on the risk of the business before entering into an agreement with them, in order to confirm their preparedness to apply proper emphasis on HSE issues, involving company products?
• Does a process exist for reviewing and improving HSE performance of contract manufacturers?
• Is a program based on product risk established and implemented which defines the required information and support to be given to contract manufacturers?
• Are periodic reviews of current contract manufacturers being conducted?

Management Practice: ST-10
Company shall provide appropriate health, safety and environmental information and guidance on their products to the suppliers

1.0 Guidance
The objective of this Management Practice is to extend Product Stewardship practices to suppliers. Where appropriate, health, safety and environmental factors should be an integral part of the procurement process, including product exchange.

1.1 Suggested Activities / Examples
Example No. 1
Establish a checklist to evaluate suppliers’ performance to be used as part of the selection process as well as a system for periodic review of suppliers’ performance. Evaluate suppliers’ performance in providing Safety Data Sheets and any other useful HSE information and to check for compliance against relevant regulations / standards as well as if material contains any banned or restricted substances. This can be done through a questionnaire which is sent to the supplier to be completed and evaluated by Product Stewardship. Develop a matrix to organize information on the people and practices of each product supplier.

Example No. 2
Train existing suppliers about the new criteria used in suppliers’ selection. Provide guidance materials to help suppliers meet company standards.
Example No. 3
Develop procedures to evaluate products shipped to be sure that the suppliers comply with the contract terms. Develop schedule for shipments to minimize safety hazards during transport and onsite storage. Develop standards for container design to help minimize product hazards.

1.2 Self-assessment
• Does a process exist to require suppliers of products to provide HSE information on their products?
• Does a process exist to incorporate HSE principles into procurement decisions?
• Is there a feedback mechanism in place to communicate new HSE information to suppliers?
• Are evaluation procedures in place to verify that suppliers are complying with contract terms?
• Is there a shipment schedule in place that identifies safety measures to minimise hazards during transportation and storage?

Management Practice: ST-11
Company shall provide health, safety and environmental information to distributors. Distributors perform a broad range of functions, from repackaging the original product to reformulating it into a new product with new health, safety and environmental characteristics.

1.0 Guidance
The objectives of this Management Practice are to:
• Encourage distributors to establish and implement proper health, safety and environmental practices involving our products.
• Work with distributors to help them achieve an appropriate level of performance on other aspects of their operations such as recycling, handling, storage, use, disposal, waste minimization and management and the transmittal of information to downstream users.

1.1 Suggested Activities / Examples
Example No. 1
Distributors are held to the same standards as for Product Stewardship responsibility and product compliance. Develop a procedure for informing distributors about the Product Stewardship Code and how your company is implementing the code.

Example No. 2
Evaluate your marketing and product information materials given to distributors for clarity of information on product hazards and procedures for proper handling, use and disposal of products. Establish a mechanism to identify useful information on common uses and potential misuses of products by distributors. Develop a system to evaluate distributors and consider terminating the business relationship with distributors who do not improve improper practices.

Example No. 3
Develop a mechanism to identify who is to receive which information and how often, who disseminates information, who is to prepare and review product communications and how often they are to be updated. Establish regular communication with distributors to assess customer satisfaction and/or problems with products.
Example No. 4
Develop procedures to address distribution risks to be applied to:
- Selection of transport modes.
- Selection of transport routes.
- Selection of carriers.
- Specification of minimum requirement for containers.
- Training of personnel.
- Emergency response preparedness.

1.2 Self-assessment
- Are background knowledge, facilities and procedures of distributors assessed based on the risk of the business before entering into an agreement with them, in order to confirm their preparedness to apply proper emphasis on HSE issues involving company products?
- Does a process exist to review and improve distributors’ performance?
- Is there a programme based on product risk established and implemented which defines the required information and support to be given to distributors?
- Is a feedback mechanism in place for addressing concerns and improper practices at a distributor?
- Does a process exist to determine if business with a distributor should continue?
- Are sales and marketing personnel actively involved in discussion and training to become familiar with emergency procedures and response plans, particularly those targeting their higher risk products?
- Do Emergency Response Plans define clear roles and responsibilities for those involved in the Product Stewardship process, particularly for incidents during distribution, off-site storage and at customer premises?
- Are Emergency Response Plans reviewed and updated on a regular basis to take account of any changes at any stage in the Product Stewardship process?

Management Practice: ST-12
Provide health, safety and environmental information to direct product distributors to foster proper use, handling, recycling, disposal and transmittal of appropriate information to downstream users

1.0 Guidance
The objective of this Management Practice is to encourage customers to establish proper health, safety and environmental practices involving our products by providing customers with information and other assistance where the product risk requires it.

1.1 Suggested Activities / Examples
Have Standard Operating Procedures (SOP) for managing customer compliance concerns and audits of production facilities.

Example No. 1
Develop a system with HSE, marketing and sales staff for tracking customer input about emerging trends or potential product problems. Assign technical staff to assist customers when problems arise with the company’s product. Develop formal procedures that address the mechanical aspects and analytic procedures required to make a product recall decision by collecting and reviewing customers’ complaints and conducting internal product evaluation.
Example No. 2
Educate customers and other direct product recipients about product stewardship and what it means to them. Have sales personnel inform and share regulations concerning products and provide the information necessary to customers to ensure their products comply with legislative requirements. Establish a channel of communication with customers to maintain an ongoing relationship to determine their needs for supplemental safety information or expertise and promote the sharing of HSE knowledge. Develop a system to ensure that the customers are able to implement appropriate safety measures.

Example No. 3
Develop system to audit customers to verify that they can handle the company’s hazardous products and to verify that customers understand product risk information. Consider working with customers to determine corrective action requirements, to develop action requirements and to develop a corrective action plan for the customer. Have SOP for managing customer compliance concerns and audits of production facilities.

1.0 Self-assessment
• Is a documented programme for communicating HSE information commensurate with product risk to customers and other direct product receivers implemented?
• Are customers encouraged to implement proper practices for the handling, use, recycling and disposal of company products consistent with the outcome of the assessment?
• Are business group customer contacts trained with respect to Product Stewardship?
• Are customers and other direct product recipients encouraged to transmit necessary information to downstream users commensurate with product risk?
• Does the Product Stewardship programme provide mechanism for customer support as appropriate?
• Is a process in place for company personnel in contact with product recipients to identify new existing product uses, concerns, etc.?
• Do the sales and marketing personnel, with appropriate technical support, regularly inspect, review and report on customer implementation of Product Stewardship requirements?
• Is a feedback mechanism in place for addressing concerns and improper practices at a customer’s premises?
• Does a process exist to determine if business with a customer should continue?