



الرعاية المسؤولة
التزامنا نحو الاستدامة
RESPONSIBLE CARE®
OUR COMMITMENT TO SUSTAINABILITY



GULF PETROCHEMICALS
& CHEMICALS ASSOCIATION
الاتحاد الخليجي للبترولوكيماويات والكيماويات

1

COMMUNITY AWARENESS & EMERGENCY RESPONSE CODE

Document Number : GPCA-RC-C01

Re-issue Date: January 01, 2018

Revision Number: 01

Prepared / Reviewed by: RC Codes Subcommittee

Ownership: Responsible Care® GPCA, Director Responsible Care® GPCA

Approval: Dr. Abdul Wahab Al-Sadoun

Acknowledgements

Reviewed and Revised by

Responsible Care Codes Subcommittee

Name	Title	Company
Harold Chuck Wray	Team Leader	SADARA
Bashar Al Fardan	Member	FARABI
Kashif Rasheed	Sr. RC Specialist	GPCA

Originally Developed by

CAER Task Force 01

Original Issue: June 15, 2011

Alan Izzard	TF Leader	Borouge
Abdulrahman Bokari	Member	Sipchem
Jassim Darwish	Member	GPIC
Ali Al-Ghamdi	Member	Sabic
Chuck Wray	Member	Sipchem

Table of Contents

	Descriptions	Page No.
Chapter One		
	Introduction	4
	Codes of Management Practices Links to RC 14001:2015 Standard	6
Chapter Two		
	Management Practices (MP), Guidance, Suggested Activities / Examples and Self-assessment	
	Awareness for Employees	
CE-1	Ongoing Assessment of Views and Recommendations	8
CE-2	Communications Training	9
CE-3	Emergency Response Plan and EH&S Training	10
CE-4	Process for Responding to Employee Views and Recommendations	11
CE-5	Communications Effectiveness Evaluation	12
	Awareness for the Community	
CE-6	Ongoing Assessment of Views and Recommendations	14
CE-7	Outreach Program	15
CE-8	Continual Dialogue	16
CE-9	Principle of Openness	17
CE-10	Communications Effectiveness Evaluation	18
	Emergency Response and Preparedness	
CE-11	Risk Assessment	19
CE-12	Emergency Response Plan	20
CE-13	Communications Training	22
CE-14	Emergency Exercises/Drills	22
	Community Engagement and Learning	
CE-15	Sharing Emergency Response Planning Information	24
CE-16	Facility Tours	25
CE-17	Emergency Response Plan Coordination	26
CE-18	Community Emergency Response Planning	27
CE-19	Experience & Information Sharing	28
Chapter Three		
	References	29

CHAPTER ONE

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 the need to adopt a philosophy of continuous improvement. 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 license to operate.

Management Codes

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

Management Code	Document Number
Community Awareness and Emergency Response (CAER)	GPCA-RC-C01
Distribution	GPCA-RC-C02
Product Stewardship	GPCA-RC-C03
Security	GPCA-RC-C04
Health & Safety	GPCA-RC-C05
Process Safety	GPCA-RC-C06
Environmental Protection	GPCA-RC-C07

Each of the above Codes includes expectations, termed 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 - CAER Code

The objective of the Community Awareness and Emergency Response (CAER) Code is to assure emergency preparedness and to foster community's right-to-know. It demands a commitment to openness and community dialogue. The Code has two major components:

1. To assure that member facilities that manufacture, process, use, distribute or store hazardous materials initiate and maintain a community outreach program to openly communicate relevant, useful information responsive to the public's questions and concerns about safety, health, and the environment.
2. To help protect employees and communities by assuring that each facility has an emergency response program to respond rapidly and effectively to emergencies.

The community outreach component will communicate program activities and performance under all Codes and the Management Practices and will promote an open, ongoing dialogue with employees and the community. Information should be provided about such activities as waste minimization, emission reduction, health effects of chemicals, and efforts to ensure the safe transport of chemicals. The CAER Code broadens the facility-community dialogue to cover the full range of safety, health and environmental issues.

This Code is divided into the following four categories / elements:

1. Awareness for Employees.
2. Awareness for Community.
3. Emergency Response and Preparedness.
4. Community Engagement and Learning

Each category / element is composed of Management Practices as indicated in Table 1 – Community Awareness and Emergency Response Management Practices. Individually, each Practice describes an activity or approach to implementing the requirements of this Code.

Codes of Management Practices Links to RC 14001:2015 Standard

The implementation of CAER Code will also help in fulfilling the requirements of the Responsible Care® management system specification RC 14001. Notably, the implementation will help in closing gaps related to Community Awareness and Emergency Response requirements of the specification, particularly those requiring Community outreach programs and response plans for the communities.

RC 14001 Responsible Care® Elements		Community Awareness & Emergency Response Management Practices																			
		CE-1	CE-2	CE-3	CE-4	CE-5	CE-6	CE-7	CE-8	CE-9	CE-10	CE-11	CE-12	CE-13	CE-14	CE-15	CE-16	CE-17	CE-18	CE-19	
4.1	Understanding the organization and its context						X														
4.2	Understanding the needs and expectations of interested parties	X			X		X												X		
4.3	Determining the scope of the EHS&S management system																				
4.4	EHS&S management system																				
5.1	Leadership and commitment																				
5.2	Policy									X											
5.3	Organizational roles, responsibilities and authorities			X														X			
6.1	Actions to address risks and opportunities																				
6.1.2	EHS&S aspects									X		X						X			
6.1.3	Compliance obligations (Legal & Other Requirements)																	X			
6.2	EHS&S objectives and planning to achieve them																				
6.2.2	Planning actions to achieve EHS&S objectives																				
7.1	Resources			X														X			
7.2	Competence		X	X										X				X			
7.3	Awareness		X											X				X			
7.4	Communication	X	X	X	X	X	X	X	X	X	X		X	X			X	X	X	X	X
7.5	Documented Information												X	X			X		X	X	
8.1	Operational planning and control																			X	
8.2	Emergency preparedness and response			X	X		X	X				X	X	X	X			X	X	X	X
9.1	Monitoring, measurement, analysis and evaluation	X		X	X	X	X			X	X				X						
9.1.2	Evaluation of compliance																				
9.2	Internal audit																				
9.3	Management Review					X	X		X				X								
10.2	Nonconformity and corrective action											X									
10.3	Continual Improvement					X															

Table 1: Community Awareness and Emergency Response Management Practices

Wherever possible these Management Practices should be included in the member company's existing programs which address the community outreach and emergency response program 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 questions that should be used in conjunction with the GPCA self-assessment tool to assist member companies identify gaps and create an effective implementation plan to address those gaps.

CHAPTER TWO

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

AWARENESS - FOR EMPLOYEES

CE-1: Ongoing Assessment of Views and Recommendations

An ongoing assessment of employee views and recommendations about the organization.

1.0 Guidance

Your employees are one of your most valuable resources in developing your CAER program. They are very important links to the community, as well as critical participants in emergency response situations. Therefore, it is essential that you assess your employees' views and recommendations to address them effectively and to ensure that they can be effective participants in the CAER process.

The best way to assess the kinds of views and recommendations provided by your employees is to ask them. Depending on the size of your facility, some methods of assessment are easier to use than others. More importantly, your assessment efforts are likely to evolve over time. Opinions, questions, concerns, views, and recommendations change with time, as significant events take place and employee turnover occurs. This is far more cost effective to be sure your efforts accurately address the community's or employees' interest, rather than committing excessive time and money into activities that do not get to the heart of the issues of concern. An accurate understanding of your employees' views and recommendations will enable you to develop more effective outreach programs, and the interactive process during assessment activities will strengthen your rapport with employees and build a more trusting relationship.

1.1 Suggested Activities / Examples

Example No.1

Gather information from employees individually through surveys or interviews. Choose questions for the survey that demand a descriptive response (not just a 'yes' or 'no' answer), and conduct the survey so the results reflect a cross-section of your workforce.

1.2 Self-assessment

- Is there a proactive system to gather information and listen to employee concerns and opinions on EHS&S, CAER, Responsible Care®, and other operational or business issues?
 - Is there a mechanism for measuring concerns that supports an easy, non-threatening way for employees to express feelings?
 - Is there a process ensuring dialogue is ongoing and there is a systematic method to respond to and effectively address the identified concerns?
-

CE-2: Communications Training

Communications training for key facility and company personnel who communicate with employees and the public regarding environment, health and safety issues

1.0 Guidance

A Leader has many responsibilities in keeping a facility operating properly. They may feel uncomfortable at the thought of being the appointed spokesperson, coordinator, liaison, and educator of the community. Keep in mind that the responsibility for community awareness activities doesn't have to rest completely with facility management. With minimal cost, great improvements in your facility or organization's communication efforts can be achieved by having in-house training for people who communicate directly with employees and the public. By improving the communication skills of key staff and widening the network of individuals who disseminate and gather information, you will not only reach more people, you will improve the quality, consistency, and accuracy of your communication efforts.

Good communication doesn't mean writing or speaking well only, it also means listening well. Effective training workshops and techniques will help your staff team to improve their speaking, writing, and presentation skills then communicate information more effectively. In addition, good training workshops will help employees become sensitive and perceptive listeners to understand the needs and recommendations of employees and the public. In turn, with a more accurate understanding of employee and public concern, you can implement more effective communication activities.

1.1 Suggested Activities / Examples

Example No.1

Conduct dry-run sessions with employees. You and your employees can never be too ready for questions that will be thrown at you in a public or employee meeting, but you should try. Use techniques, such as practice brainstorm questions and answer sessions with the Organization spokesperson being suitably tested. Practice responding to tough questions, using props and equipment, and rehearsing roles. You cannot be an expert in every field. You should study difficult questions and take time to gather necessary information to respond adequately to all questions.

Example No.2

Offer training workshops on communicating with the public, media, officials, and organizations. Company public affairs and communication specialists can share their skills and experiences with technical staff, engineers, and leaders.

1.2 Self-assessment

- Is there a process to identify key personnel and their training requirements, e.g. communication skills, outreach skills, media training etc.?
 - Is there an effective employee and community communications program including EHS&S topics?
 - Is there a system to ensure that the key personnel remain current through periodic refresher training and/or practical proficiency demonstration?
-

CE-3: Emergency Response Plan and EH&S Training

Effective education of employees about the facility's emergency response plan and environment, health and safety programs

1.0 Guidance

Organizations do not want to experience crisis or emergency situations, but within the industry it is difficult to eliminate the potential risks that may occur at a facility. Your employees will be your best resource during a crisis, and they must be aware and educated on the proper response if they desire to be effective participants.

Effective education of your employees shall involve more than posting signs on the wall. Education at its best involves an interactive hands-on process. Your education efforts shall provide an opportunity for both leaders and employees to function effectively in a team.

Employees are a valuable resource at your facility. They are the ones at the front line, and you'll find them offering productive suggestions for improving your facility's emergency response plans and EHS&S programs.

Being organized is essential if you are going to be successful in your outreach efforts with the community. How do you expect to convince the community that your plans and programs are safe and effective if your own employees don't understand or feel uncomfortable with your facility's emergency response plan and EHS&S programs?

1.1 Suggested Activities / Examples

Example No.1

Conduct meetings or training with employees in large or small groups. With adequate training, employees will be able to respond to an emergency without having to ponder a course of action. Integrate emergency response training with other facility's training programs.

Have employees train each other. Long-term employees have valuable knowledge about the facility and experience with EHS&S programs that can be shared with newer employees. Some of your employees may have been through real emergencies already.

Example No.2

Instructional videos can be purchased, rented, or created professionally or by employees. Videos can help describe emergency response plans, EHSS procedures and controls especially in cases where there are literacy or other communication barriers. Videos with effective graphics can help overcome language barriers as well.

1.2 Self-assessment

- Are specific education and training needs identified for targeted employee groups as well as for the employee population in general?
 - Are periodic education and training sessions conducted for target groups addressing the need for refresher training?
 - Is there a system implemented to ensure that key personnel remain current through periodic refresher training and/or practical proficiency demonstration?
-

- Are contractors and vendors involved in relevant educational training?
- Is there a mechanism for documenting this type of education?

CE-4: Process for Responding to Employee Views and Recommendations

Establish a process to enable the organization to respond to employees' views and recommendations and involve them in community outreach efforts

1.0 Guidance

Probably the best way to respond effectively to employee views and recommendations about your facility's operations is to create constant and consistent two-way channels of communication. Establishing such an ongoing dialogue with your employees will help to build a constructive rapport and will increase trust and understanding. Employees will become more aware of the issues of concern your facility faces and the plans in place to address those recommendations. Furthermore, working collectively with employees in decision making will help these decisions being more readily acceptable.

Having an ongoing dialogue with your employees also will help in conducting community outreach programs. Well-informed and aware employees will make very effective spokespeople. Your employees mostly live in the same communities you need to communicate with. They can provide useful insights into the dynamics of the community and can assist in developing and implementing aspects of your community outreach program.

It is important not to overlook what employees can contribute in the way of suggestions for new methods and procedures for facility operations and ideas for company and community outreach, education, and emergency preparedness.

1.1 Suggested Activities / Examples

Example No.1

Conduct informal or formal employee meetings and/or discussions, or bag-lunch information and discussion programs. Meetings provide employees with direct access to leaders and are a mechanism for responding to employees' views and recommendations. Have leadership and employees trade turns running each meeting and choosing the topics for discussion so that employees take ownership in the process.

Example No.2

Establish information areas or appoint specific individuals for dispensing information to employees. Establish enough information areas or appoint sufficient employees as information resources so the entire facility has access to a source of information. Maintain and update the information areas and train employees in communication techniques.

Example No.3

Develop employee task forces / groups for specific issues of interest or concern. For particularly difficult questions or important concerns requiring lengthy discussion or remedies, groups of interested or affected employees can be formed to answer questions or assist managers in developing solutions.

Example No.4

Involve employees in outreach by hosting community outreach programs. Employees that participate as hosts at outreach events for the community are more likely to take ownership and pride in the facility. Try to identify the concerns and interests of the community, using appropriate community communication techniques during employee meetings or through newsletter communications. Ask employees what community outreach activities they would enjoy participating in.

1.2 Self-assessment

- Is there a proactive system established to gather information and listen to employee concerns and opinions on EHS&S and other operational issues?
- Is there ongoing dialogue with employees, as well as a system to respond to and effectively address concerns and issues they have identified?
- Are community outreach programs developed including training for employees to be Spokespersons / Coordinators?
- Are employees encouraged to seek opportunities and is active support provided for employee involvement in community outreach?

CE-5: Communications Effectiveness Evaluation

A regular evaluation of the effectiveness of the ongoing employee communications efforts

1.0 Guidance

Successful employee communication efforts can mean different things for different member organizations. You have to decide what full implementation of each CAER Management Practice means for your facility and whether your efforts meet the spirit and intent of each management practice.

The first step in the evaluation process comes long before your CAER activities are implemented. Evaluation is not a task that is attached to the end of a program; evaluation must be an ongoing and integral part of your CAER program. Each step of your outreach efforts contributes to the success of your program, and each step should undergo some form of evaluation.

Before you begin to plan your employee outreach activities, you must first define your desired outcomes, expected results and objectives as specifically as possible. This enables you to better evaluate the effectiveness of your activities after they are implemented. The more specific your goals are the more thorough the process will be.

There are two basic types of evaluation, Process Evaluation and Outcome Evaluation.

Process Evaluation

Process evaluation is meant to track how well communication activities are working, examining the procedures, tasks, and administrative and organizational aspects of implementing the activities.

Outcome Evaluation

Performing an evaluation of your achievements is used to measure how effective the program is and to determine whether you have accomplished your objectives. It goes beyond the process evaluation to examine not just information about the quantity of your activities, e.g., the number of

people who received your facility newsletter, but also the value of your communication activities and feedback performance measurements, e.g., whether your employees teamed, acted, or made a change as a result of your activities.

Every formal evaluation, whether process or outcome must contain certain basic elements:

- A statement of communication objectives.
- A definition of the data / information to be collected; methodology of collecting the information; the instrument / materials to collect the data.
- The actual process of collecting the data.
- Data analysis.
- Reporting.

1.1 Suggested Activities / Examples

Example No.1

Track activities. Evaluating your employee outreach processes might include tracking:

- The volume of enquiries and the number and quality of the opportunities available to employees for submitting enquiries or communicating concerns to management.
- The quality of response systems and how well they function by reviewing responses for accuracy and appropriateness.
- Interim changes in employee awareness, knowledge, attitudes, or actions by conducting focus groups or individual interviews with employees.

Example No.2

Implement a before-and-after comparison of employee understanding and concerns through surveys, polls, focus groups, or interviews. Estimating the value of your efforts usually involves some means of before-and-after comparison, such as a comparison of employees' awareness or attitudes before and after one or more communications activities. This can be done by observing, e.g., analyzing behavior changes after EHS&S communication training, or through more in-depth research such as interviews, surveys, polls, or focus groups with employees.

Use your employees as a resource for evaluation. From your perspective, your outreach and education efforts have been successful, but what do the recipients think? Your employees are your best resource for understanding whether your efforts were effective, and how you can improve your employee outreach program.

1.2 Self-assessment

- Is there a mechanism implemented for collecting employees' opinions on communication plans, methods, and messages including seeking their recommendations for improvement?
 - Is the communication program reviewed and modified based on feedback and recommendations received from employees?
-

AWARENESS FOR COMMUNITY

CE-6: Ongoing Assessment of Views and Recommendations

An ongoing assessment process of community views and recommendations relating to the organization

1.0 Guidance

The more you understand about your target audiences in the community and your workplace, the easier it is to develop an outreach and communications program that truly responds to their concerns. You need an ongoing accurate gauge of community opinions to ensure that potential problems and concerns are addressed before they become crises.

Assessing the community's concerns and interests is the most frequently overlooked step in community outreach programs. This results in programs that fail to be successful; the programs don't respond to the real concerns of the community and instead communicate what the facility management thinks is important. It is far more cost-effective to be sure your efforts accurately address the community's concerns, rather than pouring time and money into activities that do not get to the heart of the issues of concern to the community. There is no substitute for asking people for their opinion.

1.1 Suggested Activities / Examples

Example No.1

Conduct surveys in person. A survey seeks a random sample of a target audience, and can be conducted by an interviewer or by mail. Open-ended questions provide a wider range of information. The key to a good survey questionnaire is deciding exactly what information is needed and crafting the questions carefully.

Example No.2

Conduct public meetings. These events provide an opportunity for one-on-one contact, gathering feedback from the community directly, and providing an opportunity for the community to express their concerns and ask views.

Example No.3

Analyze the content of media. Study the news coverage of your organization and related issues by reading newspapers and other periodicals. This will help you measure the amount and type of coverage particular issues are getting.

Example No.4

Use your employees as a resource. Employees interact with other members of the community every day. They can be the company's best information resource and bring back community comments and views. Meet with employees informally in small groups to learn what the community thinks about your organization.

1.2 Self-assessment

- Is there an appropriate, proactive system initiated to obtain a cross-section of community opinions, questions, and concerns about EHS&S and other operational issues?
- Is dialogue ongoing that ensures a systematic method to respond to and effectively address these concerns and questions?

CE-7: Outreach Program

An outreach program to educate responders, government officials, the media, other businesses and the community about the facility's emergency response program and risks to the community associated with the facility

1.0 Guidance

An emergency response plan will be much more effective if the public knows what to do, where to get more information, and how to participate effectively. Your job will be easier if the community knows what goes on inside your facility, what safety measures are in place, and what emergency preparedness measures have been taken.

People want to know not only what risks your facility poses to the community, but what control measures are being taken. They want to know what is being done to prevent an accident and how a facility is preparing for the possibility, not just how unlikely an accident is. People want to know what is being done to reduce toxic emissions and discharges, not just how much is being emitted. Begin your outreach program by identifying your target audience. Trying to reach everyone with one message or strategy may dilute your message so that it is meaningful to few rather than many people. Once you identify your audience, be sure your communication materials and activities speak to the specific concerns of each audience. As you implement the activities for assessing community concern in Management Practice 6, the specific concerns of each audience will become clear.

1.1 Suggested Activities / Examples

Example No.1

Set up an ambassador program. An ambassador program identifies employees willing to act as spokesperson(s) for the company outside of the facility. Spokesperson's lecture at schools, give presentations at clubs and organizations, and staff booths at fairs and conferences.

Example No.2

Conduct special tours for students. Offer tours to local schools. Young people have a strong impact on the awareness of their parents, and can provide you with a means to educating families in the community. It is a chance to interest young people in the industry, and increase their interest in science and technology.

Example No.3

Establish exchange programs or internships. Having youth work within the facility will ensure a greater level of learning for the student, and will provide your staff with greater insight on the perceptions and understanding that youth have about your facility and its operations. Students will in turn share information with their friends and families, and this is an excellent way to identify future prospects for employment. The younger the group, the more important it is to keep the tour moving and keep them active, in order to capture their interest. Booklets, guides, or any hand-

outs are appealing to students. It helps if you prepare information in advance for teachers so they can introduce concepts and issues in advance of the tour, prime the interest of the students, and prepare them so they learn even more.

Take time to prepare very specific job descriptions for interns or exchange programs. It is important that their responsibilities are thought through in detail to be sure they have enough to do, and to ensure that there is staff available to oversee their involvement.

1.2 Self-assessment

- Has a focused outreach plan been developed and implemented with program elements to reach local target audiences?
- Are spokesperson(s) designated with an established mechanism for them to obtain feedback from target audiences?

CE-8: Continual Dialogue

A continuing dialogue with the local community to respond to views and recommendations about environment, health and safety, and other issues

1.0 Guidance

Many of the methods and techniques described for the outreach program also can be used to stimulate a continuing dialogue with local citizens. The major difference is that having a dialogue means creating two-way channels of communication and achieving constructive community involvement. To establish a dialogue, information must be flowing back and forth. A dialogue means give-and-take; information is received, considered, and responded to.

Dialogue is a two-way activity based on mutual respect, trust, and open information exchange. The public wants to be heard as well as informed, and the facility/organization must consider taking its ideas and options to the community before it makes decisions. This means that the community may be presented with a series of solutions to a problem under consideration by the facility, and allowed to give its feedback. Effective dialogue will help develop a company-community partnership.

Different methods are appropriate for different audiences. For example, classroom presentations may be best for school children, while call-in radio talk shows or mail surveys may be the best way to reach homeowners. The frequency of messages and the variety of methods with which they are communicated improve the chances for successful dialogue. A number of facilities have found it helpful to bring together a planning team from various job functions to identify methods for developing and maintaining a dialogue with the public. This group brainstorms about what the facility's goals and objectives should be for community outreach. Refer to the activities in the outreach program and think about how the same methods can be used for developing a dialogue with your targeted audiences. Additional activities are described below.

1.1 Suggested Activities / Examples

Example No.1

Develop a task force / group, particularly for communities with a high level of concern. There are many different types of citizen ongoing discussion and problem-solving panels, and all can serve as a mechanism for dialogue between an organization and its community and for informing and

educating the community about facility activities.

Example No.2

Host special events related to issues that interest the community other than your organization. Working side-by-side with the community on issues of mutual interest is an opportunity for dialogue on neutral ground, where the focus is an issue of concern other than your organization. As an integral part of the community, it is essential that your organization express its concern for other aspects of community life. Host activities such as recycling days, sponsor or issue a grant for local community organization activities, or develop ongoing educational programs with local schools.

1.2 Self-assessment

- Is a goal-oriented community relations plan developed and implemented which includes an appropriate, continuing dialogue process to obtain a cross-section of community questions and concerns about site operations and impact on the community?
- Is there a system developed to effectively address and respond to the issues, concerns, and questions identified through the dialogue process?

CE-9: Principle of Openness

A principle of openness that provides convenient ways for interested persons to become familiar with the facility, its operations, and products, and its efforts to protect environment, health and safety.

1.0 Guidance

Establishing a policy of openness will help you build relationships and trust with your community. By conducting your activities in an open manner, you will make it much easier for community members to contact you to get questions answered and to express concerns. Further, such a policy will increase the likelihood that community members will learn more about the extent of your operations, the products you produce, and the emergency preparedness plans you have in place to protect public health and the environment.

A phrase frequently used by the Responsible Care® members is 'Track us, don't trust us.' This phrase recognizes that trust will take a long time for some members of the public. However, the phrase reinforces the fact that you are committed to openness and providing ways for the public to track you, and understand what your organization is doing to protect their environment, health and safety.

1.1 Suggested Activities / Examples

Example No.1

Identify a public information contact and make that person known to the community. The thought of calling a large organization to ask a question can be very intimidating. Many would be skeptical that their views would not be considered important enough to respond to. This is one of the reasons developing a dialogue, implementing outreach activities, and establishing an 'open' relationship with the community can be so difficult. Appoint staff people in your organization as the contact points for the community. Make sure these people are visible in the community, publicize their role, and make sure you remind the community of their availability on a regular basis.

Example No.2

Consider activities used for public education and dialogue as techniques for conducting a policy of

openness. To have an open policy you must do more than just open the door for receiving requests and comments, you must be able to respond readily to incoming inquiries. Preparing for responses may include having fact sheets available on request or distributed on a regular basis; providing tours to interested groups on request; sending a spokesperson to speak to a local group or neighborhood meeting; and establishing a community advisory task force / group to facilitate requests.

1.2 Self-assessment

- Is an information contact identified who articulates a principle of 'openness', when communicating information about its operations and programs to interested persons?
- Is access to the community provided using public education and open dialogue techniques (facility tours or open house events)?
- Is an information package developed and maintained for distribution to interested persons?

CE-10: Communications Effectiveness Evaluation

A regular evaluation of the effectiveness of the ongoing community communications efforts.

1.0 Guidance

Similar to Communications Effectiveness Evaluation for employees, successful community communications efforts means different things for different member facilities. You have to decide what full implementation of each CAER management practice means for your organization and whether your efforts meet the spirit and intent of each management practice. You will find that the suggestions in the following pages for evaluating community communication efforts are very similar to this chapter's suggestions for evaluating employee communication efforts.

Developing an effective internal evaluation process forces you to clearly define your goals and objectives and plan your program and activities more thoroughly. Before beginning to plan your program and activities, your desired outcome and objective, should be described as specifically as possible. This enables you to better evaluate the effectiveness of your activities after they are implemented. The more specific your goals are the more thorough the process will be.

Evaluation is not a task that is tacked onto the end of a program. There must be an ongoing and integral part of your CAER efforts. Each step of your outreach efforts contributes to the success of your program and each step should undergo some type of evaluation.

There are two basic types of evaluation:

1. Process evaluation.

Process evaluation is meant to track how well communication activities are working. It examines the procedures, tasks, and administrative and organizational aspects of implementing the activities.

2. Outcome evaluation.

Outcome evaluation is used to measure how effective the program is and to determine whether you have accomplished your objectives. This goes beyond the process evaluation to examine not just information about the quantity of your activities, e.g., the number of people who received your facility newsletter, but also the value of your communication activities, e.g., whether your employees teamed, acted, or affected a change as a result of your activities.

1.1 Suggested Activities / Examples

Example No.1

Tracking activities and evaluating your community outreach processes might include:

- Tracking or monitoring the volume of inquiries.
- Tracking the quality of response systems and how well they function by reviewing survey responses for accuracy and appropriateness.
- Tracking interim changes in audience awareness, knowledge, attitudes, or actions by conducting focus groups reviews with members of the community.

Example No.2

Implement a before-and-after comparison of community understanding and concerns through surveys, polls, focus groups, or interviews. Estimating the value of your efforts usually involves some form of before-and-after comparison, such as a comparison of target audience awareness or attitudes before and after one or more communications activities. This can be done by observing, e.g., analyzing media content changes, or through more in-depth research such as interviews, surveys, polls, or focus groups with individuals from the targeted audience.

Example No.3

Establish a task force / group as a resource for evaluation. From your perspective, your outreach and education efforts have been successful, but what does the audience think? The community is your best resource for understanding whether your efforts were effective, and how you can improve your program.

Example No.4

Analyze media coverage for content. This can help you measure the amount and type of coverage a particular issue is getting, whether your media communications efforts are working, and what sort of information may be swaying public opinion. You can do this by reading newspapers and other periodicals.

1.2 Self-assessment

- Is there a method to judge community perceptions of performance and communications effectiveness?
- Is the communications program evaluated, including seeking continual improvement in response to community feedback?

EMERGENCY RESPONSE AND PREPAREDNESS

CE-11: Risk Assessment

An ongoing assessment of potential risks to employees and local communities resulting from accidents or other emergencies

1.0 Guidance

This management practice helps you establish an ongoing role for your facility and organization in assessing the risks to your employees and the communities resulting from accidents or other chemical emergencies. Risk assessments, hazards analysis, and safety audits are part of a successful emergency planning program. This practice also provides you with the factual basis and necessary documentation to establish priorities, focus planning and response efforts, and institute change. This is one of the key management practices that establishes the basis for an active role

for your organization in the Emergency Planning Authority (EPA), emergency planning process and an opportunity for continuing contact with the community.

1.1 Suggested Activities / Examples

Example No.1

Develop and apply risk assessment measures. No one knows the substances present, their physical and chemical properties, and the processes used at your facility better than you. Because of this knowledge, you are in the best position to identify potential risks, to alert local emergency planners and responders to these risks, and to work with them in the emergency planning process.

Example No.2

Conduct or review EHS&S audits, hazards analyses, etc. EHS&S audits, hazard analyses, and other forms of analysis are vital tools that you can use when evaluating possible accident and emergency scenarios. Although some forms of such analysis can be quite expensive and resource intensive, many times the major hazards or risks at a facility can be identified using more affordable methods.

1.2 Self-assessment

- Are site operations to identify potential risks reviewed to ensure that all reasonable and practical precautions are in place to prevent accident or emergency situations?
- Is a program developed that is directed towards preventing serious process related incidents that might affect plant personnel and offsite community?
- Are hazards associated with processes that could cause fire, explosions, and releases, both onsite and offsite identified and characterized. Is a thorough examination for exposures to personnel and property in the review incorporated?
- Is there a system established to review assessment studies, results, and mitigating responses, including worst-case emergency scenarios?

CE-12: Emergency Response Plan

A current, written facility emergency response plan which addresses, among other things, communications and the recovery needs of the community after an emergency

1.0 Guidance

It is important that you take the initiative in developing and maintaining a current emergency response plan. Effective emergency planning depends on keeping the emergency plan up-to-date with pertinent and current information. Together with the Risk Assessment Management Practice and Exercises/Drills Management Practice, this management practice sets the stage for a coordinated and effective emergency response plan that includes assisting communities in recovering from emergencies. In addition, it lays the basis for building a close relationship with government agencies through Management Practices for Emergency Plan Coordination and Community Emergency Response Planning.

Local regulations may contain requirements that when implemented will require you to make risk management planning information available to authorities and the public. The risk management plan should include information on how you manage risks posed by certain substances, an indication of what you are doing to minimize risks to the community, a program for preventing releases (including EHS&S precautions, maintenance, monitoring, and employee training) and an emergency release response program (including notifying the public and local responders, providing emergency health

care, and employee training).

Local regulations may require that prior to the commencement of emergency response operations; employees must develop and implement an emergency response plan that addresses a host of coordination and logistical issues. As a result of these requirements, this management practice will help you build a better relationship with the Government agencies.

1.1 Suggested Activities / Examples

Example No.1

Encourage your leadership to develop a corporate-wide emergency preparedness master plan as part of your overall crisis management efforts to guide preparation of facility-specific plans. Establishing clear and concise corporate-wide emergency preparedness planning standards, and emphasizing the importance of achieving them, will encourage individual facilities to quickly and effectively implement emergency planning activities.

Example No.2

Develop a crisis management plan and program for events involving products and operations. A crisis management plan ensures that all your personnel are identified and are ready to implement known procedures in the event of an accident or emergency. Without such a plan, valuable response time could be lost in the initial stages of an incident. In most cases, a crisis management plan develops an overall corporate strategy that includes emergency response planning.

Example No.3

Develop and maintain a regular schedule for reviewing the emergency plan. Effective emergency planning requires periodic review and evaluation to ensure the emergency plan is kept up-to-date with pertinent and current information. By establishing a schedule for review, the activity is anticipated, necessary information can be collected, and the emergency planners are prepared for the effort.

1.2 Self-assessment

- Is there a comprehensive, written emergency preparedness, response, and recovery plan developed and implemented that includes appropriate notification and communications processes?
- Is there an integrated emergency preparedness, response, and recovery plan with the community's plan, communicated as a joint plan to all affected parties?
- Is the emergency plan reviewed and updated at agreed intervals?

CE-13: Communications Training

An ongoing training program for those employees who have response or communications responsibilities in the event of an emergency

1.0 Guidance

Facility employees who have emergency response or communication responsibilities as well as other organization employees need to have up-to-date skills to respond effectively in the event of an emergency. Everyone occupying a position that is identified in the plan must have appropriate training. This management practice establishes a support mechanism to ensure that well developed plans can be executed in an actual emergency.

1.1 Suggested Activities / Examples

Example No.1

Ensure that adequate resources necessary to fulfil the training requirements are an integral part of the budget planning process and encourage corporate wide training within your organization. This will ensure that all facilities to be aware of overall corporate training policies and standards.

Example No.2

Provide training to facility leaders on the use of the company emergency response processes, e.g., incident command system. The incident command system would be the primary means of communication during an emergency. This includes communication between responders as well as communication with workers in areas away from the incident. This is critical that you as a facility manager are trained and able to use the incident command system at your facility.

Example No.3

Invite local responders to observe training and demonstrations by facility responders to build confidence in the facility's level of preparedness. By observing first-hand the level of training and preparedness maintained by facility response personnel, local responders will have higher confidence in the ability of your personnel to respond to an incident at the facility.

1.2 Self-assessment

- Are key emergency internal and external communication contacts identified?
- Is education and training identified for all personnel involved in emergency response and/or emergency communications?
- Do key contacts maintain their skills with periodic refresher courses (or through regular media / community briefing opportunities)?
- Are relevant communications experiences shared with other facilities' contacts?

CE-14: Emergency Exercises/Drills

Regular emergency exercises, to test operability of the written emergency response plan

1.0 Guidance

As a facility leader, more than a plan is necessary to ensure the success of an emergency planning program. By conducting exercises to test the emergency response plan, you can readily determine if the procedures in your plan will work in an emergency situation or if more effective or efficient mechanisms are needed.

1.1 Suggested Activities / Examples

Example No.1

Cooperate with local authorities, Mutual Aid Organizations (MAO) and responders in co-sponsoring table top exercises in preparation for field exercises and other more demanding tests of the plan. By co-sponsoring table top exercises, you give facility and local responder representatives an opportunity to work together, establish a rapport, and familiarize themselves with each other's emergency procedures prior to an Emergency Operating Simulation (EOS), drill, or field exercise, or an actual emergency incident.

Example No.2

Enlist responders from other facilities and the community as observers and evaluators of drills and

exercises. Many times a 'fresh pair of eyes' is needed to discover inconsistencies or gaps in an emergency plan. Enlisting observers who did not participate in the drafting of the plan will ensure an unbiased post exercise evaluation. In addition, including local responders and responders from other facilities will result in new input and potentially new methods for response. As a result, important issues can be identified and included in the revisions to the emergency response plan that was tested during the exercise.

Example No.3

Conduct periodic drills to test selected aspects of facility emergency response plans. Conducting periodic drills to test selected aspects of the facility emergency response plan will enable you to address readily identified deficiencies prior to testing the plan in a large-scale field exercise. In addition, periodic drills help key emergency response personnel be trained and ready to respond. Conduct a drill to test newly developed or revised site emergency response plans and newly formed response teams. Responding to an emergency incident using an emergency plan, whether during an exercise or real-world event, provides valuable knowledge and experience not available elsewhere. Therefore, it is very important to provide that experience by conducting drills to test new provisions in the plan.

Example No.4

Actively participate in local community drills and exercises. Just as it is important that local responders be familiar with facility emergency response procedures and capabilities, it also is important that the community as a whole have a relevant level of knowledge. Sponsoring community drills will introduce the community to facility personnel, establish contacts and working relationships, and familiarize them with emergency procedures.

Example No.5

Where applicable sponsor drills for local community – emergency response teams to enables you to share knowledge and expertise that may not be available to the local team. In addition to simply sharing knowledge, this activity encourages increased coordination and communication, builds a stronger working relationship between your facility and local response teams, and promotes a more prepared and effective response mechanism.

1.2 Self-assessment

- Does a system exist that plans, designs and conducts drills / exercises to test emergency preparedness and response capabilities and communications. Are these activities carried out jointly with external responders, whenever possible?
- Are drills/exercises held on all shifts based on Process Hazard Analysis (PHA) and a variety of problems designed to challenge each segment of the emergency organization?
- Are exercises reviewed and critiqued and document action plans prepared for follow-up and improvement. Are external responders involved in this process, where appropriate?

Community Engagement and Learning

CE-15: Sharing Emergency Response Planning Information

Communication of relevant and useful emergency response planning information to the EPA

1.0 Guidance

Local facilities such as yours possess the information and expertise needed in a successful emergency-planning program. Your facility will help make the EPA planning process work. This

management practice emphasizes the critical role of information and communications in this process. This is a key management practice for setting a positive, productive tone for EPA / organization interaction.

1.1 Suggested Activities / Examples

Example No.1

Provide training and information to local officials and responders on the properties of company products, transportation routes, as well as other response-related information. No one knows your products and practices better than you. You are in the best position to bring local responders up-to-speed on what they need to know in emergency situations.

Example No.2

Meet with the EPA to formally shape information on a regular basis. Local regulation may compel facilities to provide specific types of planning related information to their EPA. Many facilities have found that a more proactive strategy of voluntarily sharing information beyond the letter of the law's requirements can be successful in building positive working relations with EPAs.

Example No.3

Work with the EPA to develop hazardous materials database for use in response activities. The vast amounts of information reported by facilities to EPAs are worthless data if it is not organized in some systematic, accessible form. Computerized databases can improve significantly the effectiveness and productivity of a resource strapped EPA.

Example No.4

Work with other organizations in your area to develop a mutual aid agreement, as it helps increase the efficiency of response and reduces the duplication of resources while maximizing existing resources. The mutual aid agreement should be an integral part of the facility emergency response plan.

1.2 Self-assessment

- Is an information package prepared covering appropriate aspects of site operations, products, personnel, communications capabilities, and emergency management systems for the external responders?
- Are information packs discussed with the external responders, identifying critical response areas or issues needing additional clarification, including providing additional information or supporting documentation, as needed?
- Are periodic reviews with the external responders scheduled and conducted to maintain or update their information package?

CE-16: Facility Tours

Facility tours for emergency responders to promote emergency preparedness and to provide current knowledge of facility operations

1.0 Guidance

Increasing local responders' understanding of your facility's hazards and its response capabilities can improve community emergency preparedness, and helps local responders develop a better understanding of your facility's hazards and specialized resources that could be accessed in off-facility emergencies through a mutual aid agreement. Inviting emergency responders to tour your facility demonstrates an open door policy and a willingness to work together. As a result, external

contacts are made and good working relationships based on mutual respect are formed.

This management practice will help you establish an avenue for exchanging information and improving relations between your facility and local response personnel.

1.1 Suggested Activities / Examples

Example No.1

Use regular facility tours as an opportunity to familiarize local responders with facility hazards, as it alerts them to the hazards they may face in an actual emergency. As a result, local responders are able to improve their emergency preparedness with regard to your facility in their own emergency plan and response procedures.

Example No.2

Provide hands-on, on-site training on facility chemical hazards, simulating potential emergency conditions provides valuable experience and knowledge that cannot be gained by reading or studying facility information. If facility and local responders are aware of the specific hazards of your facility, your prepared response will be more organized.

Example No.3

Employ an 'open door' policy for local responders. An open door policy with local emergency responders creates and encourages an atmosphere of mutual respect between your employees and their community counterparts. This is critically important to effective emergency planning and preparedness activities.

Example No.4

Where applicable, make a facility available to local responders for training purposes. Many times, the training that is needed for local responders to respond effectively to incidents at your facility is different than that needed for their other response duties. By carrying out such practices, you give local responders an opportunity to learn about your facility hazards and proper emergency response techniques. Providing safety talks and videos at the beginning of a facility tour will orient the local responders to what they will be learning. As a result, they know what to look for and why, and how to respond.

1.2 Self-assessment

- Are all potential external emergency responders that might be needed in an emergency situation identified?
- Are regular dialogue (meeting, visits, tours), or emergency system demonstrations for external emergency responders scheduled?
- Are emergency management and response systems periodically critically reviewed with external emergency responders?

CE-17: Emergency Response Plan Coordination

Coordinate written facility emergency response plan with the community emergency response plan and other facilities. If no plan exists, the facility should initiate community efforts to create a plan

1.0 Guidance

It is a very good idea to coordinate emergency planning efforts between your facility, other facilities, and the community. If no efforts are underway, consider taking the lead in beginning the

planning process for your facility and the community. This management practice goes beyond other emergency response Management Practices in suggesting a strong leadership role to 'prime the pump' of local emergency planning.

1.1 Suggested Activities / Examples

Example No.1

If no EPA or local planning mechanism exists, create a CAER group to begin the planning process. Establishing a CAER group where no EPA exists sets a positive and proactive example for your organization. In addition, by encouraging other facilities to participate, public and local government interest will grow and a diverse and motivated planning group will be formed.

Example No.2

Where no MAO or EPA exists, work with local officials to establish one and begin developing a plan. Your facility can first take the lead and contact other facilities and local response organizations to gather support for the formation of an EPA. Then by approaching local officials with this broad-based support, an MAO or EPA is likely to be formed and many potential members will already be identified.

Example No.3

Take the lead role in updating and revising the local emergency plan. When an emergency plan exists, you should offer expertise and assistance in the review of the emergency plan. If the MAO or EPA does not revise the plan due to a lack of resources or other limitations, offer to lead the review and provide support to MAO or EPA members during the review process. Hold a seminar for MAO or EPA to update them on facility emergency response plans. Many times the exchange of up-to-date information is critical to the effectiveness of an emergency plan. To share expertise, new response techniques, and information about the facility emergency response plan, sponsor a seminar for the MAO or EPA and local responders and include not only your facility but also other facilities that would like to participate. Such a seminar can then be used as the vehicle to exchange and update information on emergency plans.

Example No.4

Develop a model / ideal emergency plan and questionnaire for use in evaluating community and facility plans and to keep current on plan changes. It is critical that the MAO or EPA develop an emergency plan tailored to local conditions and hazards. By identifying the necessary elements of a clear and effective emergency plan, other plans are more readily reviewed. This format can also be used to keep current on plan changes or modifications.

Example No.5

Attend EPA meetings. By attending MAO or EPA meetings you can offer your facility's input into issues and effectively represent your neighboring industries as well as your own.

1.2 Self-assessment

- Are contacts with external emergency responders maintained to initiate or ensure availability and maintenance of a community emergency response plan?
 - Are site emergency plans with community emergency plan integrated; e.g., coordination of resources, responses, and communications with the community responders?
 - Are periodical reviews of site emergency plan with the external emergency responders and neighbor facilities performed in order to update and maintain both the community and site plans?
-

- Is organizational leadership or support for community efforts provided, if needed?

CE-18: Community Emergency Response Planning

Participation in the community emergency response planning process to develop and periodically test the comprehensive community emergency response plan developed by the Mutual Aid Organization

1.0 Guidance

Establishing a proactive and positive relationship between the facility, the MAO & EPA, and local responders requires work, but the benefits are high. By participating in the community planning process and the testing of the community emergency response plan, your facility will become familiar with the local responders and their procedures and they will become familiar with yours. Similarly, the community will view the facility as an active participant in the program to prepare for releases and ideas.

1.1 Suggested Activities

Example No.1

Work with other facilities or organizations to form a MAO or EPA where none exists. By informing each other and applicable authorities of the hazards present at these facilities, you illustrate the need for a MAO or EPA. In addition, all facilities will have expertise and resources available to support the MAO or EPA's future efforts.

Example No.2

Provide technical assistance to MAO & EPAs in the development of coordinated plans. Often EPAs will have limited resources and limited expertise. In addition, no one on the MAO & EPA will know your facility better than you. Offering the EPA technical assistance will prove valuable in the process of combining individual plans into one coordinated emergency response plan.

Example No.3

Work with the MAO & EPA to explore the feasibility of forming an emergency response team. Depending on the nature of the MAO & EPA and the area it represents, the EPA may not have access to an emergency response team. By examining resources available from facilities in the area and from responders in neighboring communities, you and the EPA can examine the feasibility of forming an emergency response team or entering into cooperative agreements.

Example No.4

Chair the MAO and assume other leadership roles in local response organizations. Assuming a leadership role in the MAO & EPA or other local response organizations creates a positive reputation for your facility. Offering assistance and resources befitting a leadership role can further that reputation.

Example No.5

Participate and host periodic exercises to test local plans and educate public and facility officials. Simulations and exercises provide valuable working knowledge of response operations and the use and function of the emergency plan. Periodic exercises keep all participants fresh and familiar with procedures.

1.2 Self-assessment

- Is there an identified CAER representative to employees, neighbors, and local community responders?
- Is the CAER representative actively involved in the community planning process, as a leader or member?
- Is there a process to sponsor, host, and/or participate in joint exercises and drills for community?

CE-19: Experience & Information Sharing

Sharing of information and experience relating to emergency response planning, exercises, and the handling of incidents with other facilities in the community

1.0 Guidance

Establish a good working relationship with other organizations in the community. By sharing information and experience, you will find that facilities begin to work together not only in preparedness and planning efforts, but also during real-world response efforts. This management practice encourages you to take the initiative and begin to work together on emergency planning programs.

1.1 Suggested Activities / Examples

Example No.1

Form an industry committee to share information among facilities in a community. An industry committee to share information among facilities provides a forum for exchanges and establishes the practice of cooperation. The atmosphere of cooperation might then extend into other areas of emergency planning such as joint exercises and mutual aid agreements.

Example No.2

Develop courses for local community and facility responders on hazards associated with specific substances found in the community. Use the expertise available at your facility to develop and present courses on hazards associated with specific chemicals. In turn, other facilities will begin to participate and a wealth of knowledge will begin to be exchanged.

Example No.3

Establish a training library for local hazardous materials for emergency responders to encourage interaction between your facility and local responders and enable you to share information you receive from your headquarters, trade associations, or other organizations the local responders may not have ready access to.

1.2 Self-assessment

- Is there a listing of local community emergency management industry partners identified and maintained?
 - Does the Organization initiate and/or participate in periodic local industry partner meetings that address emergency management issues and provide a forum for sharing experiences?
-

CHAPTER THREE

References

- GPCA-RC-C02, Issue 15-06-2011.
- Implementation Guide for Responsible Care® Distribution Code of Management Practices; American Chemistry Council.
- American Chemistry Council ACC RC 14001® 2015 TITLE: RESPONSIBLE CARE MANAGEMENT SYSTEM® TECHNICAL SPECIFICATION
- American Chemistry Council RCMS®: 2013



GPCA HQ

P.O.Box: 123055, 1601 and 1602, Level 16

Vision Tower, Business Bay, Dubai, United Arab Emirates

Tel : +971 4 451 0666

Fax : +971 4 451 0777

www.gpca.org.ae