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RESPONSIBLE CARE®
OUR COMMITMENT TO SUSTAINABILITY



2

**DISTRIBUTION
CODE**

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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 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 – Distribution Code

The objective of the Distribution Code is to reduce the risk of harm posed by the distribution of chemicals to the general public, to carrier, distributor, contractor and chemical industry employees and to the environment. Adherence to the code will lead to continually safer chemical distribution and help member companies to:

- Evaluate the risks associated with chemical distribution and methods to reduce those risks.
- Meet or exceed all regulations and industry standards governing chemical distribution.
- Provide emergency advice and/or assistance to people on the scene in the event of a chemical distribution emergency.
- Develop new technologies and methods to improve chemical distribution safety.

The code will also promote improvements in:

- Employee preparedness and awareness in preventing distribution emergencies.
- The safety performance of carriers and other providers of distribution services.
- The public's preparedness in responding to chemical distribution emergencies.
- The public's understanding of, and confidence in, industry efforts to improve chemical distribution safety.

The Distribution Code applies to all modes of transportation (highway, rail, marine, air and pipeline) and to the shipment of all chemicals, including chemical waste. The Code also applies to distribution activities (storage, handling, transfer and repackaging) while chemicals are in transit between member companies and their suppliers and customers. The implementation of a number of practices of the Code will vary according to the characteristics of the chemical being distributed, the mode of transportation and the type of distribution activity involved.

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

1. Risk Management.
2. Compliance Review and Training.
3. Carrier EHS&S.
4. Handling and Storage.
5. Emergency Preparedness

Each category / element is composed of Management Practices as indicated in Table 1 – Distribution 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 the Distribution 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 distribution requirements of the specification, particularly those requiring a system to assess the risks related to distribution and transportation activities.

RC 14001 Responsible Care® Elements	Distribution Management Practices																						
	DC-1	DC-2	DC-3	DC-4	DC-5	DC-6	DC-7	DC-8	DC-9	DC-10	DC-11	DC-12	DC-13	DC-14	DC-15	DC-16	DC-17	DC-18	DC-19	DC-20	DC-21	DC-22	
4.1 Understanding the organization and its context																							
4.2 Understanding the needs and expectations of interested parties																						X	
4.3 Determining the scope of the EHS&S management system																							
4.4 EHS&S management system											X	X						X		X			X
5.1 Leadership and commitment																							X
5.2 Policy																							
5.3 Organizational roles, responsibilities and authorities																							X
6.1 Actions to address risks and opportunities	X									X			X			X					X		
6.1.2 EHS&S aspects																							
6.1.3 Compliance obligations (Legal & Other Requirements)	X							X				X	X			X					X		
6.2 EHS&S objectives and planning to achieve them											X	X									X		
6.2.2 Planning actions to achieve EHS&S objectives																							
7.1 Resources																							
7.2 Competence						X																	
7.3 Awareness					X	X								X						X			
7.4 Communication					X				X					X	X	X		X	X	X	X	X	
7.5 Documented Information				X							X	X	X	X	X				X	X			
8.1 Operational planning and control		X					X	X	X	X	X	X	X	X	X								X
8.2 Emergency preparedness and response	X	X						X										X	X	X	X	X	
9.1 Monitoring, measurement, analysis and evaluation			X				X	X							X	X							X
9.1.2 Evaluation of compliance				X											X								
9.2 Internal audit																							
9.3 Management Review			X				X	X							X								
10.2 Nonconformity and corrective action			X															X					
10.3 Continual Improvement								X								X					X		

Table 1 – Distribution Management Practices

Wherever possible these Management Practices should be included in the member company’s existing programs addressing the distribution related requirements. Moreover, these practices should be incorporated into the existing programs in such a way that they are part of the regular management review cycle.

Chapter 2 includes the Management Practices along with guidance, suggested activities / examples and self-assessment notes that 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

Risk Management

DC-1: Regular Evaluation of Chemical Distribution Risk

Regular evaluations of chemical distribution risks that consider the hazards of the material, the likelihood of distribution related incidents, security concerns and the potential for human and environmental exposure from a release of the material throughout the distribution chain

1.0 Guidance

There are generally two types of risk assessment techniques that can be used to evaluate chemical distribution risks, quantitative and qualitative. The quantitative technique relies on statistical data and numerous calculations to develop a mathematical prediction of an incident occurring and the expected exposure resulting from an incident.

The qualitative technique relies on the experience and judgment of knowledgeable people to analyse the causes and the effects of incidents and releases in order to determine appropriate ways to reduce their likelihood or consequences.

In either case, the assessment should include analysis of the hazards of the chemical being distributed, the likelihood of incidents and releases and the implications of these releases for the public and the environment.

1.1 Suggested Activities / Examples

Example No.1

Business sectors use a variety of methods to evaluate the risks involved in transporting their materials. These methods identify the material hazards and evaluate distribution risk and potential exposure of the public and environment. Methods of distribution, routes and methods of containment should all be considered. Manufacturing sites share the responsibility of identifying risks, particularly risks that may be specific to the geographic location. An annual evaluation is completed to review additional risks due to changes in the distribution patterns or the addition of new products.

Example No.2

Regular evaluations of chemical distribution risk means completing product specific risk assessments. 'Regular' means every two (2) years for high risk materials, every three (3) years for medium risk materials and every five (5) years for low risk materials.

1.2 Self-assessment

- Do procedures exist requiring the review of the hazards of chemicals in relation to the proposed methods of containment, storage and transport?
 - Are there assigned responsibilities for conducting risk assessments?
-

DC-2: Implementation of Chemical Distribution Risk

Implementation of chemical distribution risk reduction measures that are appropriate to the risk level

1.0 Guidance

After completing the risk assessment, it is important to consider ways to reduce the risks.

A sample listing of examples include: containment selection and design, mode of transportation, carrier selection, route selection, operating procedures and practices, personal protective equipment, emergency response, specialized training or modifying product properties.

1.1 Suggested Activities / Examples

Example No.1

A process is in place to evaluate alternatives for risk reduction and to implement risk mitigation recommendations for selected materials. Responsibilities are assigned for conducting risk reduction, implementing risk mitigation measures and tracking closure of recommendations. A record of risk reduction mitigation measures is maintained and the system for tracking closure is functional.

Example No.2

The business has established plans for implementing risk reduction measures and to ensure that adequate management support, resources and authority to make changes are in place. The sites have established plans for their part of the implementation of risk reduction measures identified and are tracking those plans to see that measurable progress is being made.

1.2 Self-assessment

- Are there assigned responsibilities for the implementation of risk reduction measures?
- Is the implementation of risk reduction measures tracked through to completion?
- Are risk reduction measures reviewed for effectiveness?
- Are documented measures in-place that include an approval or authorization process from management for any deviations to existing procedures?

DC-3: Reporting and Investigation of Chemical Distribution Incidents

Reporting and investigation of chemical distribution incidents and implementation of preventive measures

1.0 Guidance

It is important to develop a reporting system for distribution incidents. The reporting should be followed by an investigation of the incident to establish the root causes and the subsequent implementation of appropriate measures to reduce the probability of a re-occurrence.

1.1 Suggested Activities / Examples

Example No.1

Reporting within the company of all distribution accidents / incidents, follow-up and investigation of causes will lead to a reduction of accidents / incidents when corrective measures are implemented. Accidents / incidents that occur during loading operations are considered as distribution accidents/ incidents.

Example No.2

A formal investigation is conducted after every distribution incident. An investigation begins immediately after the incident. The investigation report includes a summary of the incident, cause(s) of the incident, recommendations for preventing re-occurrence and an action plan with responsibilities identified.

1.2 Self-assessment

- Is there a system maintained, either directly by the company or by the contractor, for the reporting of any employee incidents and near misses during loading, storage and transport operations?
- Are there contract arrangements, or equivalent, requiring the reporting of all distribution incidents to the client company?
- Are distribution incidents defined? Is the definition shared with all appropriate stakeholders?
- Do incident reporting guidelines cover all areas, including environmental impact?
- Are storage and transport incidents promptly investigated by the company, both directly and, where appropriate, in consultation with the contractor?
- Does the investigation process promote a team approach, aimed at identifying 'root causes' and not to assign blame?
- Do the Investigation Team recommendations contain documented corrective actions?
- Do documented procedures exist that prompt decisions on corrective / preventative action following analysis of EHS&S performance trends and incidents and are they followed?
- Are decisions communicated appropriately to those concerned, particularly those involved in the reporting and investigation process?
- Do planned actions specify clear responsibilities and timing, with provision for documented follow-up?
- Are contractors directly involved or advised of requirements for planned action?

..... **Compliance Review and Training**

DC-4: Interpretations of New and Existing Regulations

A process for monitoring changes and interpretations of new and existing regulations and industry standards for their applicability to the company's chemical distribution activities and for implementing those regulations and standards

1.0 Guidance

This process does not have to be elaborate, but it must be consistent with the company's types of distribution activities. Typical process steps would include:

- Identification of all standards and regulations that govern chemical distribution.
- Setting a frequency interval for reviewing the regulations for changes.
- Developing a procedure for packing / filling, loading / unloading, transport documentation, marking, labelling, placarding and order processing.
- Documentation preparation activities that check for compliance prior to chemical distribution.

1.1 Suggested Activities / Examples**Example No.1**

The process for monitoring and interpreting regulations and industry practices is a function generally performed by a specific group within company. Sites are responsible for implementing regulations and standards and ensuring awareness and compliance with current regulations.

Example No.2

A documented process exists whereby distribution-related regulations are identified as they are released / published, implemented when effective or revised. Each business unit has assigned responsibility for monitoring and interpreting distribution regulations affecting that business unit. Assigned individuals participate in trade associations as appropriate.

1.2 Self-assessment

- Are there assigned responsibilities for monitoring, analysing and communicating regulations and industry practices?
- Are formal systems maintained for identifying and keeping up-to-date on legal requirements for all applicable jurisdictions, e.g., domestic, foreign and international regulations, with particular emphasis on dangerous goods?
- Do company representatives participate actively in industry and technical forums to keep up-to-date on best practice and to share experience?
- Is there a documented process to communicate changes to regulations and industry practices?
- Are changes tracked through to completion and is effectiveness measured?

DC-5: Training

Training for all concerned employees in the proper implementation of applicable regulations and company requirements

1.0 Guidance

Once all of the regulations have been screened and those that apply to chemical distribution activities have been identified, it is important to identify personnel who perform activities directly impacted by the regulations or those employees that affect compliance. Once identified, a training needs analysis can be completed and a training program implemented.

1.1 Suggested Activities / Examples

Example No.1

Identify personnel by shipping location and function requiring Governmental Regulatory training at each facility. The responsible persons at each facility reviews Governmental Regulatory training requirements with the individual's job description, existing procedures and training history to identify training needs. Each facility provides and documents Governmental Regulatory required training. Responsibility for conducting and documenting regular audits to review facilities' compliance with regulatory and industry training requirements exists at corporate level.

Example No.2

Company has procedures for training employees within 90 days of new job assignment date and for retraining at regular intervals. Training records are maintained for each employee. Company has a system to audit training records to ensure everyone has received appropriate training at the prescribed frequency. Company is in full compliance with Governmental Regulatory training requirements. Objective evidence of Code practice is available.

Example No.3

A documented process is in place to ensure training of appropriate personnel in compliance with distribution regulations and company requirements. Training resources are available and identified, employee training is documented and training effectiveness is measured.

1.2 Self-assessment

- Are there assigned responsibilities for training?
- Are documented procedures followed, directly or in consultation with employees and contractor management to identify EHS&S training needs for all personnel involved in loading, unloading, storage and transport activities?
- Does the prescribed training meet regulatory requirements, in particular those covering the carriage of dangerous goods?
- Is training provided for employees that respond to distribution incidents?

DC-6: Program for Providing Guidance

A program for providing guidance and information to carriers, distributors and contractors performing distribution activities for the company on the company's training and compliance requirements

1.0 Guidance

Many companies have specific requirements for the handling of chemicals. These requirements are often in addition to the regulatory requirements or are the result of voluntary industry consensus. It is important that these special requirements, along with the company's requirements and implementation practices for regulations, are effectively communicated to carriers, toll processors, public warehouse operators, distributors and any other people who provide distribution services to the company.

1.1 Suggested Activities / Examples

Example No.1

Periodic EHS&S and distribution seminars are held with carriers, distributors and contractors. Specific requirements for handling products including corporate / business policies and regulatory requirements are covered in these seminars. Procedures are in place to ensure that employees, contractors, distributors and carriers have been provided SDS (Safety Data Sheet) for the products they transport and are aware of the chemical hazards and emergency response procedures.

Example No.2

The Company communicates distribution requirements in writing to carriers, toll processors, public warehouse operators, distributors, etc. The Company also develops and offers programs that enable carriers, etc., to comply with company requirements, e.g., guidance regarding product hazards and safe handling procedures, emergency response training drills or regulatory seminars. Company performance expectations are clearly communicated to all carriers, distributors, etc. and information updates are regularly provided. EHS&S seminars with all carriers are conducted at least once every two (2) years.

1.2 Self-assessment

- Are there assigned responsibilities for providing guidance and information to carriers, distributors and contractors?
 - Is there a documented process to identify and make available guidance and information and for maintaining information up to date?
 - Is there a process to follow-up on the effectiveness of the guidance and information provided?
-

DC-7: Regular Review

Regular review of employee, carrier, distributor and contractor compliance with applicable regulations and company requirements

1.0 Guidance

The ultimate test of the program's effectiveness will come from regular measurement of compliance with the regulations and the company's own specific requirements. The use of regular reviews also serves as a gauge for measuring the effectiveness of the company's training and compliance process, as well as the training effectiveness and compliance of a wide range of providers of distribution services.

1.1 Suggested Activities / Examples

Example No.1

There are regular documented audits to ensure that all site employees, carriers, distributors and contractors activities are in compliance with applicable regulations. A system is in place to respond to deficiencies noted in the audit.

Example No.2

A compliance assessment process is in place to review contractor performance against applicable regulations and standards related to activities performed. Provision for this process is included in contracts. The process includes:

- A listing of the regulatory, company and industry standards the contractor is required to comply with.
- Defined organizational responsibilities for conducting reviews and providing expertise and support.
- Procedures for carrying out the review process.
- A timetable that establishes the frequency of reviews.
- Procedures for communicating the results of reviews to contractors.
- Provision for establishing corrective actions to be taken and a procedure for follow-up through completion of such action.
- Procedures for documentation and retention of review findings, follow-up information and corrective actions.

Audits are performed including internal, external and third-party. Results are reported to appropriate personnel for review and action. A formal system is in place for reviewing and correcting non-compliance to ensure company employees, carriers, distributors and outside contractors are in regulatory compliance.

1.2 Self-assessment

- Are there assigned responsibilities for reviewing compliance with regulations and company requirements by company employees, carriers, distributors and contractors?
 - Is there a documented process to review compliance with regulations and company requirements by company employees, carriers, distributors and contractors?
 - Is there a documented process to determine 'root cause' and assign corrective action for all non-conformances?
 - Are corrective actions tracked through to completion and effectiveness confirmed?
-

Carrier EHS&S

DC-8: Qualifying Carriers

A process for qualifying carriers of all modes and types (common, contract, private and customer controlled) that transport chemicals to and from company facilities that emphasizes carrier EHS&S fitness, regulatory compliance and includes regular reviews of their performance and compliance

1.0 Guidance

Companies may have many options for transporting their products. These include suppliers of raw materials and the company's customers. The qualification process begins with the collection of data on EHS&S programs, performance and regulatory compliance. Each company should determine the frequency to review performance and compliance.

1.1 Suggested Activities / Examples

Example No.1

There is a formal documented program for qualifying carriers of all modes and types that includes the following:

- Collection of data by audit or survey of carrier safety performance and safety programs.
- Evaluation of the data should include review of carrier safety performance against previously established criteria.
- A decision making process for carrier selection that takes safety data into consideration.

1.2 Self-assessment

- Are there assigned responsibilities for qualifying service providers and reviewing performance and compliance?
- Does the carrier selection criteria include effective EHS&S policy and programs, inspection and maintenance procedures, selection and training of operators / drivers, support staff and subcontractors, regulatory compliance and root cause and corrective action procedures?
- Are documented criteria used to select contract storage facilities and carriers for company products?

DC-9: Feedback to Carriers

Feedback to carriers on their EHS&S performance and suggestions for continuous improvement documented by means of an improvement plan

1.0 Guidance

An important component is to provide feedback on EHS&S performance and suggestions for improvement. Assessment protocols are helpful tools to assess and identify areas for improvement.

1.1 Suggested Activities / Examples

Example No.1

There is a formal communication process that provides feedback to carriers on their EHS&S performance. The process allows for dialogue to discuss carrier EHS&S performance, identify areas of improvement and where appropriate, provide suggestions for improvement.

Example No.2

The Company establishes a dialogue with carriers regarding carrier internal EHS&S programs and coordination with site requirements. Examples are meetings with the carrier's top management to discuss EHS&S performance and corrective action progress or more frequent carrier reports that measure safety performance and highlight trends that need immediate action.

1.2 Self-assessment

- Are there assigned responsibilities for providing feedback on performance?
- Have metrics been identified to determine performance?
- Is a formal process established for monitoring trends in contractor EHS&S performance and implementation?
- Does a process exist for regular face to face meetings and physical presence at contractor facilities for inspection and auditing for higher risk areas of operation?
- Is there a formal process to track the implementation of required performance activities and to support continuous improvement?

Handling and Storage

DC-10: Procedure for selection and use of all types of packaging and containment

Documented procedures for the selection and use of all types of packaging and containment that is appropriate for the chemical being distributed, in compliance with United Nations (or equivalent) testing and certification standards

1.0 Guidance

Requirements for packaging are addressed in several internationally recognized standards such as United States Code for Federal Regulations (US 49 CFR) and European Carriage Regulations (ADR, RID and ADN) Regulations. Depending on the hazard class and packing group of the chemical and the quantity being distributed these standards specify type and size of package or containment required.

In addition, many chemical companies and many container suppliers have packaging development and evaluation programs. These programs address specific concerns about chemicals that may have unique properties or a combination of hazards present.

A final safeguard against a distribution incident involving the company's chemicals is the verification of the integrity of the package or containment being used.

1.1 Suggested Activities / Examples

Example No.1

A documented procedure is in place that defines how to select, test, certify and use suitable shipping containers to achieve regulatory compliance. The procedure is regularly audited and updated to meet changes in regulations and industry practices. The term 'container' is used broadly for the purposes of the Distribution Code. A container can include bottles, bags, drums, rail cars, tank trucks, barges and ocean-going tankers.

Procedure Implementation Criteria:

- A documented container selection process.
- Written packaging specifications.
- Documented procedures for inspection and quality assurance.
- Documented leak and defect detection procedures.
- Documented third-party testing and certification, where required.
- Packaging compliance requirements.
- Processes to determine that practices and procedures are being followed.

1.2 Self-assessment

- Are there assigned responsibilities for selection and use of containers including pails, drums, totes, bulk trucks, truck / trailers, ISO tankers and marine vessels?
- Are the documented procedures in compliance with national, and where applicable, international standards, practices and legal requirements?
- Are risk assessment conclusions and distribution incident causes considered in the selection and use of containers?

DC-11: Procedures for Loading, Filling and Packing of Chemicals

Documented procedures for loading, filling and packing of chemicals at company facilities that will reduce emissions to the environment, protect personnel and provide secure lading during transit

1.0 Guidance

This element again addresses areas that may be covered by international, regional or local regulations. Many companies have established loading procedures based on these regulations and some companies' procedures go beyond the regulations due to the properties of the chemicals being distributed.

1.1 Suggested Activities / Examples

Example No.1

Procedure Implementation Criteria:

- Documented loading / unloading procedures are in place for all transportation modes.
- Spills / vapour emissions containment controls exist.
- Personnel protection is provided through training, education and appropriate safety equipment.
- Periodic review of procedures exists and corrective actions are taken as appropriate.

Example No.2

Procedures are in place that includes:

- Validation that transportation equipment is suitable for intended service.
 - Identification of personal protection required for specific chemicals to be loaded/unloaded.
 - Minimizing emissions during loading / unloading.
 - Identification of bracing, seals and valves required.
 - Utilization of a checklist procedure during loading / unloading operations, including a line-up check.
 - Elimination of possible vessel overfills.
-

Example No.3

Procedures and controls are in place to carry out the final check of the equipment to ascertain securement of the load and that the container is free of leaks and visible defects prior to it leaving the facility.

1.2 Self-assessment

- Are there assigned responsibilities to ensure the safe loading of chemicals?
- Are there documented procedures to ensure the safe loading of chemicals?
- Are distribution incidents related to loading recorded and investigated?
- Are procedures reviewed regularly for effectiveness?
- Are risk assessment conclusions and distribution incident causes considered in the revision of procedures?

DC-12 Procedures for Unloading Chemicals

Documented procedures for unloading chemicals at the company's facilities that will reduce emissions to the environment, protect personnel, and provide for safe unloading into proper storage facilities

1.0 Guidance

The requirements for this management practice are very similar to the requirements for loading chemicals. However, in addition to the emphasis on emissions reduction and personnel protection, this element highlights the need to ensure that the chemical is being unloaded into the appropriate storage facility. Again, regulations and the unique requirements of the chemical being unloaded need to be recognised during the development of the procedures required.

1.1 Suggested Activities / Examples

Refer to Management Practice DC-11.

1.2 Self-assessment

- Are there assigned responsibilities to ensure the safe unloading of chemicals?
- Are there documented procedures to ensure the safe unloading of chemicals?
- Are distribution incidents related to unloading recorded and investigated?
- Are procedures reviewed regularly for effectiveness?
- Are risk assessment conclusions and distribution incident causes considered in the revision of procedures?

DC-13: Criteria for the Cleaning and Return of Containment

Defined criteria for the cleaning and return of railcars, road tankers, containers, marine vessels and other methods of containment and for the proper disposal of cleaning residues and un-cleaned non-returnable packaging

1.0 Guidance

This activity may be performed in a member company's facilities or by a carrier or cleaning contractor. Wherever possible where cleaning is undertaken using an external contractor, that contractor and their facility shall be Gulf SQAS (Tank Cleaning) assessed. Based on the properties of the chemical being cleaned, the company should develop practices for the cleaning procedures

used and the appropriate disposal of cleaning residues. These practices should be communicated to the personnel or supplier or cleaning contractor performing the cleaning.

1.1 Suggested Activities / Examples

Example No.1

Cleaning and return implementation criteria:

- Waste management procedures exist for various modes.
- Inspection of cleaned containers is documented.
- Training of appropriate individuals is documented.
- Documented procedures for the disposal of residue exist for on and off site cleaning facilities.
- A documented process exists to promote the use of approved disposal sites.

Example No.2

The Company develops written guidance to carriers on the safe and effective removal of chemicals from containers. The guidance specifies procedures for identifying chemicals, selecting and using protective equipment, conducting cleaning operations and disposing of residues. Product or category specific procedures are developed for chemicals that present unique environmental or personnel hazards. An ongoing system for developing, updating and communicating procedures is in place.

1.2 Self-assessment

- Are there assigned responsibilities for cleaning chemical containers?
- Are documented procedures provided to employees or carriers describing the appropriate EHS&S steps?
- Are distribution incidents related to cleaning recorded and investigated?
- Are cleaning procedures reviewed regularly for effectiveness?
- Are risk assessment conclusions and distribution incident causes considered in the revision of procedures?
- Are applicable local and/or international regulations relating to disposal of cleaning residues identified and adhered to?

DC-14: Program for Providing Guidance and Information

A program for providing, updating guidance and information to customers, distributors and other receivers on the correct procedures for unloading and storing the company's chemicals.

1.0 Guidance

The intent of this Management Practice is to share information related to handling and storing chemicals. This can be part of an overall Product Stewardship Code communication program. The provision of an SDS (Safety Data Sheet) is the minimum information that shall be provided to those involved in the handling and distribution of chemicals.

1.1 Suggested Activities / Examples

Example No.1

Information relevant to EHS&S and product quality is developed for loading, unloading and storage procedures. This information is communicated to customers and others involved in the loading,

unloading and storage of company products. Product bulletins and commodity specific brochures are used for communication. High hazard materials necessitate regular meetings and more specific product handling instructions.

Example No.2

Provisions have been made to supply all intermediaries and customers with EHS&S procedures for unloading hazardous products. A Product Safety Stewardship Program is in place for communication to all receivers/handlers of company products. Operating guidelines are distributed to all facilities handling or storing hazardous materials emphasizing the need to minimize:

- Fire risk.
- Personal injury due to chemical exposure.
- Accidental release causing environmental pollution.

This includes a verification program to ensure compliance including on-site inspection.

1.2 Self-assessment

- Are there assigned responsibilities for providing guidance and keeping the guidance up-to-date?
- Are documented procedures provided?
- Are procedures reviewed regularly for effectiveness?
- Are risk assessment conclusions and distribution incident causes considered in the revision of procedures?

DC-15: Process for Selecting and Approving Distributors

A process for selecting and approving distributors and other facilities that store or handle the company's chemicals in transit that emphasizes EHS&S suitability and regulatory compliance and includes regular reviews of their performance and compliance

1.0 Guidance

The activities of distributors and other facilities that store and handle the company's chemicals could result in incidents that harm people and the environment. Companies should identify the criteria needed to safely and responsibly handle and store chemicals and incorporate these criteria into a selection and review process.

1.1 Suggested Activities / Examples

Example No.1

There is a documented process that selects and audits third parties that handle the Company's products and chemicals, including distributors, toll processors, contract packagers, public warehouses and termination and transfer operations.

The selection process leads to careful and informed decisions about those who will provide these services and emphasizes EHS&S fitness and regulatory compliance.

1.2 Self-assessment

- Are there assigned responsibilities for selecting distributors and other facilities?
 - Are documented procedures, e.g., assessment protocols, used to determine fitness and compliance?
-

- Has minimum criteria been established to approve a distributor or other facility?
- Is there a documented performance management program to review performance?
- Is there a documented procedure to track execution of required activities?

DC-16: Feedback to Distributors and Operators

Feedback to distributors and operators of other facilities that store or handle chemicals in transit on their EHS&S performance and suggestions for continuous improvement documented by means of an improvement plan

1.0 Guidance

The Distribution Code, like other Codes of Management Practice, stresses the concept of continuous improvement. This element addresses this concept and should be an outcome of the regular review process. The information gathered during those reviews should be analyzed by the company and the distribution service provider, areas for improvement identified, action plans developed and implemented and performance measured.

1.1 Suggested Activities / Examples

Example No.1

Distributor reviews that include meetings with distributor management to discuss / review their EHS&S programs / procedures in the handling and storage of hazardous chemicals. The company reviews the distributors' performance and incident reports. The company conducts an annual distribution audit to:

- Monitor EHS&S and service performance.
- Identify strengths and weaknesses.
- Develop corrective action plans and preventive programs.

Substantive dialogue, establishing common goals and setting improvement objectives are all part of the feedback process. Regular, scheduled reviews with distributors, operators of toll manufacturing facilities and operators of bulk transfer stations should focus on EHS&S performance.

1.2 Self-assessment

- Are there assigned responsibilities for the performance management of distributors and operators of other facilities?
- Are documented procedures, e.g., performance management scorecard, used to communicate performance goals and to determine EHS&S performance and compliance?
- Is there a documented procedure to track implementation of required EHS&S and process improvements?

Emergency Preparedness

DC-17: Responding to Chemical Distribution Incidents

A process for responding to chemical distribution incidents involving the company's chemicals

1.0 Guidance

A company policy should be in place that sets out senior management commitment to responding to incidents, assigns responsibilities for implementation and delegates the necessary authorities for execution.

1.1 Suggested Activities / Examples

Example No.1

A written plan is in place describing response to distribution incidents / accidents involving company chemicals. This plan complies with all regulations as well as being integrated with corporate crisis management and emergency response plans and policies. The plan also includes procedures for notification, roles and responsibilities, exercising and periodic review for effectiveness.

Example No.2

Implementation Criteria:

- A documented emergency response process exists, trained response teams are in place and/or emergency response contractors are retained for response to accidents/incidents. Evaluation of the process is conducted periodically to monitor effectiveness.
- A list of Emergency Response personnel, responsibilities, assignments and telephone numbers is current and maintained.
- Emergency Response equipment is available for off-site responses, where appropriate.
- Contracts with Emergency Response contractors, if applicable, are periodically reviewed.
- A documented accident / incident reporting process is in place.
- Reviews and critiques of product accidents / incidents are performed and documented.
- A documented procedure exists for informing senior management of accidents/incidents.

1.2 Self-assessment

- Are there assigned responsibilities for preparing and responding to emergencies?
 - Does an emergency plan exist to make specific provision for the handling of 'on-site' and 'off-site' storage and transportation incidents, either directly or in close cooperation with contractors?
 - Are the plans documented and is the scope proportionate to the risk taking into account, at a minimum, the most likely emergency scenarios?
 - Have plans been developed in consultation with employees, contractors, emergency response agencies and other stakeholders and, where appropriate, have these plans been coordinated with plans of neighboring industries, e.g., mutual aid associations and national / community disaster plans?
 - Do the features of the plans include the following:
 - i. Early warning and initial information arrangements, including 24-7-365 availability.
 - ii. Communication between contractor and company involving trained and qualified employee(s).
 - iii. Response in remote areas.
 - iv. Training and responsibilities of company and contractor employees.
 - v. Measures taken to control or limit the consequences.
 - vi. Communication with emergency services and additional company resources.
 - vii. Provision for cooperation with government agencies during and after an incident.
 - viii. Information on hazards, inventories of hazardous materials, at least meeting legal requirements.
 - ix. Procedures for safe evacuation of, and accounting for, all people who may be affected.
 - x. Provision of information to the community, to the families of persons affected and to other concerned stakeholders.
 - xi. Provision for recovery and rehabilitation of affected persons or facilities.
 - xii. Procedures for control / clean-up and rehabilitation of any environmental damage.
 - xiii. A documented procedure to review the company's response to an emergency.
 - xiv. A documented procedure to track corrective actions through to completion.
-

DC-18: Availability of Chemical Distribution Information to Emergency Response Agencies

Documented procedures for making current information about the company's chemicals during distribution available to emergency response agencies

1.0 Guidance

The company should understand the need of various emergency response agencies to have access to information about chemicals of the company with which they may become involved. It should further recognize the need for this information to be available in advance of an incident for planning purposes as well as readily available at the time of an incident.

1.1 Suggested Activities / Examples

Example No.1

Implementation Criteria:

- Product SDS (Safety Data Sheet) are on file at a central repository providing 24-7 guidance and information services relating to handling transportation incidents, e.g., CHEMTREC® in the US.
- List of products, shipping names, emergency response contacts and telephone numbers are on file at the company's emergency response center.
- Product shipments include a 24hour emergency telephone number.
- Hazardous materials shipments include product emergency response information as required by local regulatory agencies, e.g., Department of Transportation (DOT) in the US.
- A process exists to update the central repository and the company's databases.
- A process exists to ensure that product shipping information, i.e., hazard classification; proper shipping, labelling, etc. and packaging requirements are reviewed as appropriate.

1.2 Self-assessment

- Are there assigned responsibilities for communicating with response agencies?
- Have the appropriate agencies and their contacts been identified?
- Are there documented procedures to determine the required information, e.g., a needs assessment and the methods to provide the information?
- Does the company track information provided or agency information requests?

DC-19: Training Materials

A program for making facilities and/or training materials available to emergency response agencies

1.0 Guidance

This Management Practice deals with establishing a system for extending the provision of training to those that may become involved with the company's chemicals but that are remote from plant facilities. Included are Emergency Planning Authorities, etc. along the transportation routes, and at remote storage, handling and distribution centers.

1.1 Suggested Activities / Examples

Example No.1

Joint training sessions or drills should be held regularly. The Company participates regularly (at least biannually) in emergency response training with local agencies and provides resources to supplement local capabilities.

Example No.2

A documented program is in place for making facilities and/or training materials available to emergency response agencies, which include:

- A list of facilities, equipment and training materials.
- Contact information for emergency response agencies (local fire departments, mutual aid groups, etc.).
- A schedule for joint training as appropriate.
- A process for inviting emergency response agency personnel to company training sessions.
- A schedule for regular follow-up contact and training.

1.2 Self-assessment

- Are there assigned responsibilities for making facilities and training materials available to agencies?
- Are there documented procedures establishing a plan to communicate regularly with agencies concerning their needs and expectations?
- Are agencies invited to participate in company training programs?
- Does the company provide training specific to an agency's role in an emergency and are training records maintained?

DC-20: Dialogue with Emergency Planning Organizations

Dialogue with emergency planning organizations, e.g., authorities and/or mutual aid on the distribution and hazards of the company's chemicals to improve community preparedness to respond to chemical distribution emergencies

1.0 Guidance

This Management Practice is directed principally at improving the emergency response awareness and preparedness along distribution corridors that carry large volumes of company chemicals. This includes the provision of information, training, specialist equipment and direction regarding actions to be taken in the event of a transportation incident. It may also include joint drills to test procedures, interfaces and communications. It is suggested that Community Awareness and Emergency Response (CAER) programs include preplanning for distribution incidents.

1.1 Suggested Activities / Examples

Example No.1

A program is in place where company emergency response and distribution personnel regularly meet with emergency planning organizations along primary distribution corridors where large volumes of company chemicals are carried. The meetings are aimed at sharing information, training community law enforcement and emergency response personnel on chemical emergencies and providing guidance to the general public. Company personnel are also made available to participate in, observe and critique drills with law enforcement and emergency response personnel along these primary distribution corridors.

1.2 Self-assessment

- Are there assigned responsibilities to ensure there is dialogue with emergency planning organizations?
 - Does a documented process exist and are there schedules in place requiring regular communication with state and local organizations?
 - Is dialogue with planning agencies recorded and reviewed regularly?
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DC-21: Dialogue with the Public

Dialogue with the public on their concerns about chemical distribution safety, actions taken by the industry and the company to improve the safety of chemical distribution and the effectiveness of emergency preparedness and emergency response assistance

1.0 Guidance

This Management Practice involves outreach initiatives to civic organizations, public agencies and forums, school programs, customers and distributors. Activities that support this practice are viewed as being instrumental for demonstrating adherence to the principles of the Product Stewardship Code and should be closely tied to the Objectives and Management Practices defined in the Code.

1.1 Suggested Activities / Examples

Example No.1

A documented process exists that extends the site's dialogue with state and local emergency planning organizations to include the distribution and hazards of the company's chemicals. These efforts are coordinated effort with other company sites and other companies. Sites participate in Emergency Planning Authorities (EPA) activities, e.g., TRANSCAER® in the US, ICE in Europe.

Example No.2

Implementation Criteria:

- There is participation in EPA activities, product hazards and distribution information are communicated to the public as appropriate.
- Participation in EPA and TRANSCAER activities is documented.
- Communications on product hazard and distribution information are documented.
- There is a formal documented program of regular timely communication between the company and the public, focusing on public concerns and needs about chemical distribution safety. Dialogue also focuses on continually developing new and better ways to increase the public's confidence in your abilities, expanding the public's knowledge of chemical distribution and improving their preparedness to deal with chemical distribution incidents.
- This dialogue is coordinated with the appropriate management practices of the CAER Code and there is a cooperative effort with other sites.

1.2 Self-assessment

- Are there assigned responsibilities to ensure there is dialogue with the public?
 - Does a documented process exist and are there schedules in place requiring regular communication with stakeholders? For example, neighboring companies, non-government organizations and the public.
 - Are convenient methods available to the public to contact the company and/or obtain information on the company's distribution safety practices?
 - Is the public asked about their concerns and company activities?
 - Is dialogue and information requests recorded and reviewed regularly?
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DC-22: Adoption of Safety Quality Assessment System (SQAS)

Adoption of Gulf Sustainability, Quality Assessment System (SQAS) as the preferred means of assessing, selecting and managing the continuous improvement process of the providers of distribution services

1.0 Guidance

Gulf SQAS is the assessment process led by the GPCA and committed to by chemical company CEO's as the preferred means of improving the standards of distribution / logistics services. Gulf SQAS currently applies to Road Transport, Warehousing and Tank Cleaning and will be expanded to include Rail. It involves an extensive assessment of all of the service providers systems and procedures covering fully the practices in earlier management practices.

1.1 Suggested Activities / Examples

Example No.1

A documented process exists by which when distribution or logistics services are tendered, it is a requirement of the tender / contract that service providers shall be SQAS assessed (Road, Warehouse, or Tank Cleaning, where appropriate).

Example No.2

- Chemical companies shall assign responsibility within their organisation to suitably experienced and trained people to access the Gulf SQAS System and review the assessment report.
- Critical criteria shall be defined by which assessed companies can be judged to meet the chemical companies requirements.
- Those suitably experienced and trained people shall review completed Gulf SQAS reports on the System in order to establish if the assessed company has met the criteria or has committed to correct any deficiencies by uploading an improvement plan.
- The Chemical Company may choose to select service providers who meet all of their critical criteria.
- The Chemical Company may choose to select service providers who do not meet all of the criteria on the basis that they implement the required improvements within a defined timescale, such as the start of the contract.

Example No.3

- During periodic review meetings the chemical company may seek updates from the assessed service provider as to their progress against improvement plans uploaded onto the system.
- This will enable the Chemical Company to ensure that service providers fulfill commitments and there are no unacceptable deficiencies in their service.
- Chemical Company representatives may attend Gulf SQAS assessments as an observer with the agreement of the service provider to ensure the quality of the assessment.

1.2 Self-assessment

- Is the requirement for potential service providers bidding for business to be SQAS assessed?
 - Is the requirement to be maintain Gulf SQAS assessment specified in the contract for its duration?
 - Has a suitably experienced and qualified person or persons been nominated to review the SQAS assessment and any improvement plans uploaded to the system.
 - Is there records, probably including system templates, demonstrating that reviews of Gulf SQAS reports have been carried out against the companies selection criteria and any deficiencies highlighted and timescales for the implementation of improvements agreed.
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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
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