EUROPEAN ASSOCIATION OF CHEMICAL DISTRIBUTORS

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Fecc European Responsible Care Programme

EUROPEAN RESPONSIBLE CARE PROGRAMME

FOR

CHEMICAL DISTRIBUTORS

Responsible Care®
OUR COMMITMENT TO SUSTAINABILITY

EUROPEAN ASSOCIATION OF CHEMICAL DISTRIBUTORS

(*Fecc*)

January 2016
Version 2.3.

EUROPEAN RESPONSIBLE CARE PROGRAMME

Contents

I. BACKGROUND

Responsible Care is both an ethic and a commitment intended to build trust and confidence in an industry that is essential to improving living standards and the quality of life.
At international level, the International Council of Chemical Trade Associations (ICCTA) updated the Joint Responsible Care/Responsible Distribution Programme in 2005. The European Association of Chemical Distributors (Fecc) is a member of ICCTA and is committed to this Programme as it provides a common framework for the implementation of RC/RD across the world.

In Europe, Responsible Care in the distribution sector is based on:

- The Responsible Care partnership agreement signed between Fecc and Cefic (at European level)
- The Responsible Care partnership agreements signed between national chemical distribution associations (NA) and national chemical industry associations, which license RC in their respective countries.

II. SCOPE

The European RC Programme is addressed to Fecc members:

- Fecc member companies' legal entities in European countries where no National Chemical Distribution Association exists. Fecc will inform Cefic regularly about these cases.
- National Chemical Distribution Associations (NA) that:
    - intend to adopt the Fecc European RC Programme to support the implementation of RC in their country (e.g. NAs that are currently applying the producers' RC Programme), and
    - intend to delegate the management of RC in the distribution sector of their country to Fecc.
- Pan-European chemical distribution company members (operating in more than one country) that are authorised by the chemical distributors' national association in those countries to apply the Fecc European RC Programme directly with Fecc.

Note: This Programme has been approved by the Fecc Board and through the partnership agreement with Cefic. Therefore National Chemical Distribution Associations that adapt the Fecc EU RC Programme and/or manage the Programme themselves are not in scope of this Programme.

Fecc will not promote parallel RC in any country with a National Distributor Association that offers an RC Programme authorised through a signed partnership agreement with the National Producer Association.

III. EIGHT GUIDING PRINCIPLES

The European RC Programme is based on the Eight Guiding Principles as specified in the ICCTA Programme:

- Legal requirements
- Management of risk
- Policies and documentation
- Provision of information
- Training
- Emergency response
- Ongoing improvements
- Community interaction

The implementation of these Eight Guiding Principles is carried out through a series of concrete requirements. These requirements are explained in the following sections.

IV. REQUIREMENTS

Those companies (hereinafter 'the company (-ies) who wish to participate in the Fecc European RC Programme, are required to comply with the requirements below.

The Fecc European RC Programme is self-funding. An application fee will be requested from companies and national chemical distributor associations wishing to apply the Fecc EU RC Programme.

For companies and national chemical distributors associations adopting the Fecc EU RC Programme an annual fee will be applied.

For national chemical distributor associations who wish to manage their own Programme but who require support from Fecc such support will be provided on a cost recovery basis.

The Fecc Board shall determine the fees annually.

IV.A. MANAGEMENT COMMITMENT

The commitment of the top management of the companies is crucial for a good implementation of the RC Programme as RC is a philosophy that has to be reflected in the various parts of the company.
In order to formalise the preparedness of the top management to follow the RC guiding principles, a formal commitment to the guiding principles shall be signed by the chief executive officer (CEO) or the managing director of each company. A copy of this commitment shall be sent to Fecc. The letter will include the commitment to:

- comply with the rules of use of the logo (according to Annex III)
- monitor the progress of the Programme within the company
- devote sufficient time and resources to the implementation of RC, including the appointment of a Responsible Care Coordinator (RCC) a model of the letter is included in Annex I.

IV.B. CANDIDATE REQUIREMENTS

Companies who have sent the commitment from the CEO but have not yet completed the validation process become 'candidates' of the Fecc EU RC Programme upon submission of:

- a self-assessment report Fecc, and
- an Improvement Plan, and
- a KPI report for the previous calendar year, and
- proof of participation in meetings or workshops on subjects related to Responsible Care.

The company will perform a self-assessment based on an approved Third Party validation (see IV.4) questionnaire, the ESAD Di questionnaire or the ICCTA Self-Assessment Questionnaire. The self-assessment documents together with the Improvement Plan (based on the self-assessment) and the KPI Report need to be sent to the Fecc RC Manager.
The RC Manager will perform a quality check of the submitted documents in order to:

- establish if the Improvement Plan is in line with the S.M.A.R.T. (Specific, Measurable, Achievable, and Relevant, Timely) principles
- check the Improvement Plan for irregularities
- check the self-assessment report for irregularities
- check the link between the self-assessment report and the Improvement Plan.

Note: The reason for this quality check is to have a good quality of self-assessment and to have a realistic view of the company's overall RC level. This will prevent companies being

disappointed when the Third Party Validation is carried out, should a large number of non-conformities then be identified.

The candidate status is only an interim solution and to progress to full Programme compliance with the grant of the use of the RC logo, a date for the completion of the Third Party Validation needs to be set within a year. Further delays of up to one year will need to be justified to the Fecc RC Committee.

If this completion does not happen within two years, the situation will be reviewed and the participation in the Fecc EU RC Programme will cease.

The company submits the Third Party Validation to the Fecc RC manager who will undertake an evaluation and make a recommendation to the RC National Associations sub Committee on the grant of the use of the RC logo (see VI below).

IV.C. PERFORMANCE REPORT

The companies are also committed to report annually on their performance in terms of health, safety, security, quality and environment, as well as on the continual improvement of this performance.

This commitment requires the annual reporting of Key Performance Indicators (KPIs) as indicated in the Fecc questionnaire (see Annex VII). Once a year, the company, under the supervision of the RCC, must fill in the questionnaire and send it to Fecc. The questionnaire is the way to report, not only figures, but also experiences and learning that may be useful for other companies.

Fecc publishes the aggregated KPIs of the participants in the Fecc European RC Programme in an annual Responsible Care Report.

IV.D. THIRD PARTY VALIDATION PROCESS

The company should submit evidence that a Third Party Validation has taken place.
To be compliant with the requirements of ICTA, the output of this validation process may be in the form of:

- Assessment (e.g. ESAD) which must as a minimum evidence compliance with all relevant legal requirements
- Verification (pass/fail) (e.g. ESAD and evaluation by Fecc RC Manager)
- Certification by an authorised certification body (yet to be established)

The three levels of output show an increasing level of robustness of the validation process deployed by the third party assessor.

Based on the commitment to continuous improvement companies are encouraged to progress to the higher levels of validation as soon as possible. Companies will not be allowed to regress back from a higher level of validation once implemented to a lower level.

The *Fecc* European Responsible Care Programme allows, by exception, those companies that meet the following criteria, an exemption from the requirement to undertake third party validation:

- The site is an office-only micro business in its country of operation (<10 employees, and turnover or balance sheet total, ≤ € 2 m), and
- Its country of operation has no accredited SQAS ESAD assessors, and
- Its country of operation has no National Distributor Association.

A company meeting these criteria will satisfy the requirements of the Fecc European RC programme if it continues to provide annually the ICCTA Self-Assessment Questionnaire, together with the Improvement Plan (based on the self-assessment) and the KPI Report to the Fecc RC Manager. The RC Manager will perform a second party validation of the submitted documents.
If there is a change in circumstances, such that one or more of the criteria are no longer met, then the exemption will cease to apply, and the company should undertake third party validation when the next cycle falls due.

IV.D.1. SQAS Distributor/ESAD and alternative third party validation tools

SQAS Distributor/ESAD provides a suitable tool to assess the distributor's performance on issues relevant to RC. In fact, the SQAS/ESAD Di questionnaire is structured around the eight RC guiding principles as mentioned above. Therefore it is suited to conduct such an assessment.

Alternative assessment tools, and their suitability for a Third Party Validation of RC, should be discussed in and agreed on in advance by the Fecc RC Committee. A company wishing to use an assessment tool not already agreed by the Fecc RC Committee should submit a description of the scheme to the Fecc RC Manager, including details of the validation documents, information on the selection and training of assessors, and the management of the scheme.

To be compliant with the requirements of ICCTA, the following criteria need to be applied to evaluate independence and competence of the third party:

- the third party should have a significant source of income outside of the chemical industry
- the third party should receive specific training and refresher training on the basics of Responsible Care programmes. Where training is provided, the maintenance of training records is encouraged.
- in the case of Certification, the third party should be a national certification body and an organization controlled or ratified by a national government. If this is the case, the third party can then certify rather than verify the system or process.

The Fecc secretariat will then perform an evaluation of the proposed alternative validation tool against the criteria defined below.

- The nature of the validation scheme, and whether the scheme:
    - covers all eight guiding principles of RC
    - is available throughout Europe
    - is well-recognised within the chemical sector
    - has areas of overlap with SQAS/ESAD, and areas of equivalence identified
    - covers all relevant activities of the company or members of a national association
    - requires additional information in order to understand the scope of the assessment at the company or members of a national association
    - has an acceptable frequency of re-assessment.

<u>The assessors:</u>

- what qualifications and experience the assessors have
- how the assessors are trained in the basics of the RC scheme and by whom
- who employs the assessors
- whether the assessors are independent of the company or members of a national association
- whether the assessors would be available in the countries where use of the scheme is proposed
- who undertakes the quality control of the assessors.

<u>The validation report:</u>

- in what form the output of the validation would be reported
- whether the output would enable an Improvement Plan to be devised.

<u>Verification, (where used), and whether:</u>

- a template and scoring system could be developed for the scheme
- the Company's or members of a national association performance could be determined against each guiding principle of RC
- comparative information is available.

The Fecc secretariat will draft a recommendation to the Responsible Care Committee to approve or reject the validation scheme. If there is evidence that the scheme will not give a clear and robust picture of the company's or national association's RC implementation on all Eight Guiding Principles, then the scheme may not be adopted. In this case, the application process will stop and the company or national association will either opt to use another validation scheme or will not be able to join the Fecc RC Programme.

IV.D.2. Third party validation (what to assess, where and frequency)

Third party validation should take place in the controlling office or headquarter site and, where applicable, in at least one sample operational centre (e.g. warehouse/tank farm/distribution centre):

- in each country where the company is applying for the logo
- covering all the relevant activities at the site (e.g. where chlorinated solvents are handled section Cs of the ESAD assessment should be used as well as the Di section).

If more than one operational site exists in the country, there should be a rolling programme to cover all sites. The validation will be repeated regularly at least every three years (three years for SQAS Distributor/ESAD assessments) to ensure an up-to-date review of the company's situation.

IV.D.3. Validation analysis

In order to verify a satisfactory level of compliance with RC principles the Fecc secretariat will review the company's third party validation reports.

After performing a third party validation, the company or the national association will provide Fecc secretariat with the validation report and an updated Improvement Plan based on that validation.

The Fecc secretariat should undertake an analysis of the output of the validation and should report to the RC Sub-Committee of National Associations the following:

- compliance with all relevant legal requirements
- the percentage of RC questions answered positively

- the percentage scores in each section of the assessment related to the individual guiding principles (e.g. in the Distributor Standard Activities (Di) questionnaire).

The Fecc secretariat should provide information on the performance of the company compared with average scores achieved by other companies using the same validation scheme, where such information is available.

Improvement Plan

In order to verify the company's commitment to continuous improvement, the Fecc secretariat should report on the presence of an improvement plan and the measures/deadlines in place to close the findings of the validation. The Fecc secretariat should provide information on whether and to what extent the planned improvements close all the gaps in the implementation of RC identified in the validation, and whether the timescale for improvement is acceptable.

The company would be expected to prioritise the improvements required, and the timescale for doing so. For example, it would be expected that where the score for legal compliance was low, that the improvement plan would address this and that compliance with legal requirements would be a priority for action, and planned to be achieved within one year. Significant progress against all gaps identified by the validation would be expected during the validity period of the validation.

In the case of SQAS Distributor/ESAD, a template may be introduced. Fecc Secretariat will apply this template to extract information from the Di (and other sections as appropriate) assessment and issue an electronic report including:

- the number of questions positively answered
- score in each section of the Di (and other appropriate sections) questionnaire (equivalent to the score for each of the eight guiding principles).

In order to confirm continuous improvement:

- comparison of scores with previous assessment
- score of the improvement section (section 7 of Di: ongoing improvements)
- presence of Improvement Plan.

The company commits to following up on the results of the validation. Particular attention should be given to those sections/guiding principles where the lowest score has been achieved and/or where there is no progress compared to previous validation.

Where there is a template, it will be concluded if the company has processes in place to ensure that this improvement takes place, also taking into consideration if progress has been made in implementing the recommendations agreed at the previous validation.

The Fecc secretariat is the sole viewer of the third party validation report and Improvement Plan. The validation is completed on individual basis and there is no comparison of validation reports of different companies. The findings of the assessment and the validation are to be regarded as confidential.

The Fecc secretariat will review the company's third party validation reports to ensure that the improvement takes place, taking into account that progress has been made in implementing the recommendations agreed at the previous validation.

Fecc will regularly publish the average scores of the SQAS Distributor/ESAD assessments across Europe to facilitate company benchmarking. Fecc will also monitor these developments to identify areas where guidance or support is broadly needed in order to improve the outcome of these ESAD assessments.

IV.D.4. Outcome of the validation analysis

The Fecc secretariat presents the results of the validation for each individual company in the form of the Fecc European RC individual evaluation report to the Fecc RC Sub-Committee of National Associations. The Fecc European RC authorisation report contains a summary of the validation analysis using only aggregated data.

IV.E. PRODUCT STEWARDSHIP

The company will apply the principles of Product Stewardship as an integral part of its policies. More information about Product Stewardship for chemical distributors is available in the Annex V (Cefic- Fecc Joint Guidelines on PS).

IV.F. PARTICIPATION

Companies are encouraged to proactively:

- share views and exchange experiences on the implementation of RC in regular meetings,
- participate at least twice a year in meetings on issues related to Responsible Care, preferably with other companies from the chemical sector
- listen, engage and work with the public to understand and address their concerns and expectations

- cooperate with governments and organisations in the development and implementation of effective regulations and practices, and to meet and exceed them
- consider how best to encourage other companies to commit to and participate in RC

The company's RCC will be responsible for most of the participation issues.

V. COMMUNICATION AND THE FECC RC COMMITTEE

It is important to ensure that the RC Coordinators have the opportunity to discuss specific issues with each other and with their associations, and ways to continuously develop and improve both their own activities and the RC Programme.

Regular input from Responsible Care members is strongly encouraged by Fecc. CEOs/managing directors and RCCs have a duty to maintain integrity and share best practice within the Fecc and national association's umbrella. For that purpose, Fecc will organise regular meetings of a Fecc RC Committee. Fecc staff will provide the secretariat for this Committee. RC Coordinators from companies as well as from national associations will be invited to attend the Fecc RC Committee. Other initiatives such as workshops or information sessions will be organised on a regular basis.

In addition, there is also a commitment to communicate the Responsible Care message effectively within organisations and to the wider public. It is the combination of good performance and good communication that will help improve the reputation of the chemical distribution industry. Communication on RC and its benefits will also be encouraged.

VI. PERMISSION TO USE THE LOGO

The RC logo is a protected trademark. In Europe it is owned by Cefic. Fecc and Fecc member companies acknowledge the Cefic Responsible Care governance process. Fecc annually communicates to Cefic which Fecc member companies are granted the permission to use the RC logo by Fecc under the conditions listed below.

On the basis of the RC authorisation report (see section IV.D.4), the Fecc RC National Associations sub Committee grants permission to use the RC logo to Fecc members compliant with the conditions detailed under section II (Scope).

Chemical distribution companies receive the right to use the RC logo from Fecc on condition that they comply with the requirements of the Fecc European RC Programme listed above.

Fecc reserves the right to withdraw the permission to use the logo if the requirements above are knowingly or repeatedly breached. In these cases, the company will receive a formal warning from Fecc following a decision by the Fecc RC National Associations sub Committee.

Should the company fail to address the concern within six months, the Fecc RC National Associations sub Committee will refer the matter to the next Fecc Board meeting who can withdraw the permission to use the logo. This permission may be re-granted if the company addresses the issues, following a new Board decision based on a recommendation of the Fecc RC National Associations sub Committee.

A Company may appeal against the recommendations/ decisions of the Fecc RC National Associations sub Committee by submitting the complaint in writing to the Fecc Board through the Director General. The Board will consider the complaint and their decision shall be final.

VII. RELATION WITH NATIONAL PROGRAMMES

VII.A. RELATION WITH NATIONAL CHEMICAL DISTRIBUTION ASSOCIATIONS

National programmes in line with the ICCTA programme will be considered as also being in line with the European RC Programme. Companies who received the logo and are part of a national programme will be regarded as in compliance with the European RC Programme in those countries. Companies are strongly encouraged by Fecc to participate in RC activities on a national level.

Fecc will communicate at the aggregated level the KPIs received from companies applying the European RC Programme to the Fecc national associations.

VII.B. RELATION WITH NATIONAL CHEMICAL INDUSTRY ASSOCIATIONS

In countries where no national distributor association exists, companies are strongly encouraged by Fecc to participate in the chemical producers activities on RC at national level.

Fecc will provide Cefic with the following information to be circulated by Cefic to its national member/affiliate associations:

- a copy of the Fecc European RC Programme
- the list of the Fecc member companies that have joined the Fecc European RC Programme
- on request, the name of the RC Coordinator of each Fecc RC member company.

Fecc member companies acknowledge the important role of the national chemical industry associations in the governance of Responsible Care for the chemical industry in countries where no national distribution association exist. Fecc will coordinate communication of all Responsible Care data acquired under the Fecc European RC Programme with the relevant national chemical industry associations.
In case of a substantial conflict between a specific Fecc member company's individual annual Responsible Care Action Plan and the relevant national chemical industry RC requirements, Fecc will assist in aligning specific national requests with the support from Cefic.

VIII. ANNEXES

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ANNEX I: CHIEF EXECUTIVE'S COMMITMENT

The National Association/Company is committed to the Eight Guiding Principles of Responsible Care as follows:

- Conform to all legal regulations and requirements and operate in accordance with both government and industry codes of practice and guidance associated with their activities
- Ensure that their activities do not present an unacceptable level of risk to employees, contractors, customers, the public or the environment
- Have written documentation covering their activities, and ensure that their health, safety and environmental policies reflect their commitment to Responsible Care as an integral part of their business strategy
- Provide relevant health, safety and environmental information on company products and activities to employees, contractors, customers, statutory bodies and the public
- Ensure that all employees are aware of their commitment and provide the training necessary to enable them to be involved in the achievement of health, safety and environmental objectives
- Establish and maintain an appropriate emergency response system
- Support and participate in activities that will improve the quality of their own operations and strengthen health, safety and environmental consciousness and awareness
- Maintain an awareness of and respond to community concerns that relate to their activities

In addition, the National Association/Company commits to:

- Annually report the performance indicators
- Complete within two years the Third Party verification of the company's RC programme
- Use the RC logo in according to the rules in Annex III
- Appoint a Responsible Care Coordinator

NAME CEO					
COMPANY					
SIGNATURE		**DATE**			

Address details National Association/Company:

☎										
🖷										
✉										

ANNEX II: APPOINTMENT OF THE RCC

NAME COMPANY	
NAME RCC	

The RCC is responsible for the implementation of the European Responsible Care Programme in the company, including:

- Annual report of Key Performance Indicators
- Participation in relevant meetings on RC
- Liaise with other RCC
- Follow up on the improvements identified during the Third Party Verification
- Monitor the use of the logo in the company

Contact details RCC:

JOB TITLE										
										
										
										
										

ANNEX III: APPLICATION DOCUMENT

Fecc European Responsible Care Programme – Application Form

Return to:

Gerhard Ahlbrecht *gah@fecc.org*
Fecc Manager RC & Logistics
Tel: + 32 (0)2 679 02 64
Fax: + 32 (0)2 672 73 55
Rue du Luxembourg 16B, B-1000 Brussels

The undersigned company applies for entry into the Fecc European Responsible Care Programme. The undersigned company commits to follow the rules and requirements as laid down in the Fecc European Responsible Care Programme.

The company commits to provide Fecc with all documents as formulated in the Chapter IV – Requirements of the Programme: CEO commitment (annex I), appointment of RC Coordinator (annex II), KPIs questionnaire (annex IV), and third party assessment report.

After submitting this form to Fecc, the company shall receive:

- The Fecc European Responsible Care Programme with annexes
- The Guidelines for the implementation of the Fecc European RC Programme

The Programme is self-funding. A company entering into the Programme will pay a fee of 500 € per country every three years.

The process for receiving the RC logo is set out in the Guidelines.

Company data (in the country applying for RC logo)

Name of the company:

Country/countries:

Personal data

Name: Email:

Job title: Tel:

Address:

Country:

Signature: Date:

ANNEX IV: TEMPLATE IMPROVEMENT PLAN

BASIC NON CONFORMITY INFORMATION					RISK/IMPACT ASSESSMENT INFORMATION			REMEDIATION		
#	Description	Guiding Principle	Date Reported day-month-year	Last Update day-month-year	Impact Description	Impact H / M / L	Probability H / M / L	Completed Actions	Planned Future Actions	Status (Green:Action closed (1), Orange: ongoing (2), Red: Not started yet (0)
Provide a unique identifier	General Description of the non conformity	Indicate which guiding principle is affected	Enter the date the non conformity was first reported	Enter the date the non conformity (not the entire log) was updated	List the specific impact the Non Conformity could have on Safety, Quality, Environment,.... Other impacts can also be listed. Several impact lines can be entered for 1 NC	Enter here H (High); M (Medium); or L (Low) according to impact definitions	Enter here H (High) M (Medium) or L (Low)	List, by date, all actions taken to respond to the different impact lines.	List, by date, what will be done in the future to respond to the non conformity	

ANNEX V: LIST OF CONTACTS NATIONAL ASSOCIATIONS
Please click on the link: http://fecc.org/fecc/members/national-associations

ANNEX VI: RULES OF THE USE OF THE RC LOGO
Please click on the link: Rules of the Use of the RC Logo (ICCA 2007)

ANNEX VII: FECC EUROPEAN KPI QUESTIONNAIRE

Please fill in this form in capital letters and return to Gerhard Ahlbrecht (gah@fecc.org)

Please include data as of 31 December 2015

Introduction

This questionnaire is composed of 2 parts:

I. **RC Programme of the Company (information required on the implementation of RC by your company)**

II. **RC Key Performance Indicators (KPIs) (data from the Companies committed to RC)**

For more information about the requested data, please contact Fecc.

Company Name :

1. Contact person for Responsible Care

   ……

2. Contact person for RC Key Performance Indicators (KPIs) (if different):

   ……

PART I: RESPONSIBLE CARE PROGRAMME OF THE COMPANY

	YES	NO
Is your company committed to RC?		
If YES, do you carry an Annual Report of the RC KPIs?		
To what organization do you report the RC KPIs?		

Do you have Third Party Verification (TPV) system in place?

YES	**Please describe how this TPV system works in practice:** Who is carrying out the assessments? *Please choose option* a. SQAS/ESAD accredited assessors b. Others (please specify)……. How often are these assessments being done?…… ……
NO	**Please describe which kind of assessment do you have in place:** 1. The companies carry out a self-assessment 2. Periodic review of self-assessment questionnaires by the National Association

Name of the NA caring out the SAQ :

How often do you organize training on RC for your employees?	

PART II: RESPONSIBLE CARE KEY PERFORMANCE INDICATORS (KPIs)

1. Legal requirements

No of convictions	

2. Management of risk

A. No of incidents

Total No. of Incidents in transport	as reported under relevant transport regulations to carriage of DG	
	accidents plus spills on the public road/highways that are attended by one or more of the emergency services	
Total No. of Incidents on-site	involving chemicals	
	not involving chemicals	
	at your company's premises	
	Third party service providers involving company's goods	
Total No. of Incidents while loading/unloading	at your company's premises	
	at customer's premises	

B. Lost-Time Injuries Rate

Lost Time Injuries (Causing 3 or more days of absence from work)	
Total number of worked hours in a year for all employees in company	
No. of employee fatalities	

C. Waste

Produced by your company for disposal due to your own operations without re use or recycling	
Originated from the customer, which your company manages as a service or legal requirement	
Intended for re-use or recycling	

Hazardous waste	
Non- hazardous waste	

D. Security

1) Have you completed security risk assessment(s) in line with legal requirements (eg ADR 1.10) or the "*Fecc* Model on Voluntary Measures on Substances Subject to Trade Controls" or similar national security code(s)/system(s)? If YES, please specify.	
2) If multi-sited, have all sites been risk assessed?	
a) If your answer is NO, please specify how many sites are risk assessed. If your answer is NO, please specify how many sites are **not** risk assessed.	
b) If your answer is NO, please explain the reason(s) **why** certain sites are **not** risk assessed.	

3. Policies and documentation

Does your company have at least one ISO certificate?	
Does your company have completed at least one SQAS module?	

4. Provision of information

How many of your company's sites have been SQAS Distributors ESAD assessed?	

5. Training during the last year

Does your company include RC as part of the training for new employees?	
Does your company include RC as part of regular training for employees? (at least every 5 years)	

6. Emergency response

Does your company have an emergency response system in place 7 days/ 24 h?	
Does your company have regular review and test of the emergency response system in place?	

7. Ongoing improvements

Does your company have an improvement plan in place?	

8. Community interactions

Did your company have at least 1 initiative on community interaction last year (open days, participation in relevant conferences as speaker, etc.)	

Please include few details of the initiative/s carried out:

Do you have further comments or any other RC KPIs indicators relevant to this questionnaire?

ANNEX VIII: CEFIC-FECC GUIDELINES ON PS

Please click on the link: **Cefic-Fecc Guidelines on PS**

ANNEX IX: CEFIC RESPONSIBLE CARE GOVERNANCE PROCESS

Cefic Strategy Implementation Group Responsible Care – 2009

CEFIC GOVERNANCE OF RESPONSIBLE CARE®

1. CONTEXT

Cefic actively promotes the Responsible Care initiative of the chemical industry in Europe and – through its membership in the International Council of Chemical Associations (ICCA) –at global level. All Cefic member[1] national federations are signatories to the ICCA Responsible Care Global Charter launched in 2006. The Global Charter commits its signatories to actively support national and global Responsible Care governance processes to ensure accountability in the implementation of Responsible Care. In June 2008 the ICCA established a global Responsible Care governance process defining the roles and obligations of Responsible Care federations and companies.

The roles and obligations described below for Cefic and its member/associate[2]/partner[3] federations correspond to those for the ICCA and its member associations as described in the ICCA Responsible Care governance process.

2. CEFIC STRATEGY IMPLEMENTATION GROUP RESPONSIBLE CARE

The Cefic Strategy Implementation Group Responsible Care (SIG RC) manages the Responsible Care initiative and the Responsible Care governance at European level under the responsibility of the Programme Council Build Trust. The SIG RC consists of representatives of Cefic member/associate national federations and companies appointed by the Cefic Programme Council Build Trust. The SIG RC sets up Responsible Care Issue Teams in order to implement works and/or communication on the subject. It engages more broadly with all members of the Cefic Responsible Care network through information exchange forums.

[1] Cefic has 22 national member federations.
[2] Cefic has 6 national associate federations.
[3] To date Cefic has signed partnership agreements on Responsible Care with the European Association of Chemical Distributors (FECC) and the European Chemical Transport Association (ECTA). Roles and obligations of these associations in relation to Responsible Care are defined in the respective partnership agreements.

All Cefic member federations and companies can volunteer and are eligible to become a member of the Cefic SIG RC, in accordance with art. 16 of the Cefic by-laws on internal proceedings. SIG RC members are thus committed to take responsibility and play an active role in the strategic implementation of Responsible Care at European level.

At the European level, the SIG RC takes the equivalent responsibilities which at ICCA level are held by the Responsible Care Leadership Group. For the Responsible Care framework in Europe, the SIG RC:

- develops statements of policy, position and guidance;
- reviews each Cefic member federation's status and performance outcomes;
- monitors the use of the Responsible Care brand and registered logo to ensure its integrity;
- organizes in co-ordination with other Cefic operational bodies communications, mutual assistance and other technical support to build capacity and other knowledge necessary to achieve performance improvement;
- carries out corrective actions where necessary, up to and including recommending the revision of Cefic (and ICCA) membership/association/partnership by the Board of Directors.

The SIG RC provides support for Cefic member/associate/partner federations in Responsible Care, which is particularly important for smaller organizations that may be resource-limited. This support includes provision of a European networking process that enables best practice sharing, mutual support and experience sharing between participating countries and organizations. The SIG RC focuses efforts on helping federations to encourage SMEs to sign on to and engage in Responsible Care by offering support for them to do so, and by making the business value clear. Greater company participation further strengthens the initiative, and thus industry's commitment to social responsibility.

Hereunder is specified how Cefic and its member/associate/partner federations implement the governance of Responsible Care defined by the ICCA.

3. OBLIGATIONS OF CEFIC MEMBER/ASSOCIATE/PARTNER FEDERATIONS

All Cefic member/associate national federations and partners associations will at all time ensure that their actions developed under Responsible Care comply with applicable law and in particular with competition law.

The following are the ICCA/Cefic Responsible Care obligations with which each Cefic member/associate/partner federation must conform in order to maintain good standing within Cefic respectively within the partnership to Cefic. These obligations are consistent with those described in the ICCA governance document and in the Responsible Care Global Charter.

Each Responsible Care Federation shall:

1. Sign a Declaration of Support for the Responsible Care® Global Charter.

2. Appropriately license the Responsible Care logo for use by their member companies in accordance with Cefic regulations on the use and control of the registered trademarks.
3. Actively participate in the work of the Cefic Responsible Care Forum and the ICCA Responsible Care Leadership Group (RCLG).
4. Report annually to Cefic and the RCLG the collective performance of their member companies in various aspects of Responsible Care as defined by Cefic and the RCLG.
5. Develop and administer processes of verification of their member companies' implementation of their national Responsible Care® initiatives, up to and including verification processes carried out either by associations, government bodies or other external organizations.
6. Develop and administer processes for the revocation of Responsible Care status and rights of companies that do not meet their national Responsible Care commitments.
7. Encourage CEOs of Multinationals in their country to sign the Responsible Care Global Charter commitment.
8. Keep members abreast of international initiatives which should be supported through Responsible Care at a national and regional level.

Failure to carry out any of the obligations above will result in the actions described in 5 below. Cefic member/associate/partner federations are also responsible for ensuring that their members comply with the obligations of Responsible Care signatories as set out in 4 below.

4. OBLIGATIONS OF CEFIC MEMBER COMPANIES

Individual Cefic member companies which participate in the Responsible Care programme shall seek as appropriate implementation of Responsible Care in the country(ies) in which they have chemical facilities or in which they are a significant part of the supply chain. To support this, it is expected that the Chief Executive Officer of multinational companies signs the Declaration of Support for the Responsible Care® Global Charter.

Companies are expected to assist each other, support the performance measurement, improvement, verification and reporting initiatives of their association and encourage non-Responsible Care companies to participate in the initiative. In Europe, the use of the logo is granted to companies by a Cefic member/associate/partner federation that has been licensed to do so. Companies may use the logo in the EU or that country outside the EU according to European or local terms and conditions. Companies that do not conform to the Responsible Care programme commitments and requirements are subject to the Responsible Care revocation process of the Cefic member/associate/partner federation they are a member of.

5. ENSURING CONFORMANCE BY CEFIC MEMBER/ASSOCIATE/PARTNER FEDERATIONS

The SIG RC will review the ongoing performance of Cefic member/associate/partner federations on an annual basis through an annual survey and by other appropriate means. A member/associate/partner federation that does not faithfully discharge the obligations of Responsible Care will be formally notified by the SIG RC and be expected to develop a plan

that identifies corrective actions after availing themselves of the support provided by the SIG RC as described in section 2.

Failure to prepare a corrective action plan or to implement corrective actions, within a specified timeframe (between 3- 6 months depending on specific circumstances of the association) will result in the appointment of SIG RC delegates to make direct contact with the association, preferably through a visit to their offices, to assess its intent and capabilities, leading to either a corrective action plan and appropriate mutual assistance or to a recommendation by the delegates that the association be asked to show cause why its Cefic (and ICCA) membership/association/partnership should not be reconsidered.

Failure to discharge the obligations of the corrective action plan, or an inadequate response by the association to the request will result in the SIG RC recommending to the Cefic Board of Directors the removal of the federation from membership/association/partnership in/with Cefic as the participation in Responsible Care is a precondition of membership. The same recommendation will be expressed by the RCLG with reference to the membership in the ICCA in the case of an ICCA member association.

ANNEX X: ICCTA SELF-ASSESSMENT

Apart from the very first question in this Self-Assessment Questionnaire, all the other questions should provide answers which indicate whether your company has started to produce A *Joint Responsible Distribution/Responsible Care Programme*. Thus,

A means that you have not started at all

B means that you have a routine established but you have no written policies or procedures

C means that you have an established practice and that you may have some written procedures or standards

D means that you have established routine procedures which are in accord with your written procedures, policies and standards

These figures give an indication which can be used in subsequent investigations to gauge performance.

SELF-ASSESSMENT QUESTIONNAIRE

1. LEGAL REQUIREMENTS

1.1 Are you aware of the current legislation relevant to your business?

1.2 Does the company have a means of ensuring that it keeps abreast of legislative developments in health, safety and environmental areas?

1.3 Is there a means of ensuring that relevant personnel are advised of legislative requirements and how to comply with them?

1.4 Is there a means of confirming that the company and its personnel comply with legal requirements?

2. MANAGEMENT OF RISK

2.1 Does the company have a formal risk management Programme?

2.2 Is consideration given to health, safety and environmental aspects of new and/or modified facilities at the design stage?

2.3 Do procedures exist to ensure safe working during both routine and non-routine operations?

2.4 Are there arrangements in place to ensure existing facilities are adequately maintained?

2.5 Is there a procedure to monitor the introduction of new products?

2.6 Is there a procedure to ensure that only safe and suitable packaging is used?

2.7 Is there a procedure to ensure that product can be safely delivered to customers' premises?

2.8 Are all aspects of waste management adequately addressed?

2.9 Does the company take steps to prevent the misuse of chemicals which are subject to regulatory and other controls?

2.10 Does the company control access to its premises?

2.11 Is consequential liability adequately covered?

3. POLICIES AND DOCUMENTATION

3.1 Does the company have a health and safety policy?

3.2 Does the company have an environmental policy?

3.3 Does the company have a quality policy?

3.4 Do policy statements define company objectives and embody the principles of a *Joint Responsible Distribution/Responsible Care Programme*?

3.5 Are policy statements reviewed at regular intervals?

3.6 Are policy statements brought to the attention of all personnel?

3.7 Are policy statements supported by effective management systems?

3.8 Does the company have a policy and defined criteria for the selection of hauliers, warehouse operators, waste disposers and other contractors?

4. PROVISION OF INFORMATION

4.1 Does the company maintain a database for health, safety and environmental information on the products it handles?

4.2 Are employees provided with information on the health, safety and environmental risks associated with their work activities?

4.3 Are visitors to the company's premises provided with the information necessary to ensure their safety?

4.4 Are contractors provided with relevant health, safety and environmental information?

4.5 Are customers supplied with adequate health, safety and environmental information and other technical data on the products supplied to them?

4.6 Does the company have a means for providing revisions to such data to known recipients?

4.7 Does the company provide advice and/or service to customers on disposal of products and used packaging?

5. TRAINING

5.1 Are new employees provided with induction training which includes, as appropriate, training on health, safety and environmental aspects of their job?

5.2 Are existing staff adequately trained?

5.3 Is there a mechanism for identifying and reviewing training needs of existing personnel?

5.4 Are personnel at all levels who carry out specific tasks given training appropriate to those tasks?

5.5 Are records of all training kept?

6. EMERGENCY RESPONSE

6.1 Does the company have appropriate twenty-four hour emergency plans for all its on-site activities?

6.2 Does the company have appropriate twenty-four hour emergency plans consistent with governing regulations for all off-site activities?

6.3 Do you liaise with the Emergency Services in the preparation of emergency plans?

6.4 Are you familiar with the reporting requirements of incidents covered by governing regulations?

7. ONGOING IMPROVEMENTS

7.1 Are management systems reviewed at regular intervals with a view to improving their effectiveness?

7.2 Are internal audits and audits of contractors carried out in a planned way?

7.3 Are the findings of all audits reviewed?

7.4 Are customer complaints (all types) monitored and reviewed and is corrective action taken?

7.5 Are measures in place to ensure effective monitoring of quality, health, safety and environmental performance?

7.6 Are injuries, spillages and dangerous occurrences investigated to establish causes and enable the initiation of preventative action to prevent a recurrence?

7.7 Does the company obtain feedback from its employees, contractors and customers concerning any problems or unsafe practices encountered in the undertaking of its business?

7.8 Does the company promote the principles and practice of *A Joint Responsible Distribution/Responsible Care Programme* within the business community?

8. COMMUNITY INTERACTION

8.1 Does the company promote the principles of *A Joint Responsible Distribution/Responsible Care Programme* to other organisation?

8.2 Do personnel at each location maintain good relations with neighbours?

8.3 Is the company actively involved with the local community?

8.4 Does the company allow for openness in relation to information on health, safety and the environment?

	A	B	C	D
	No	Partly	Almost	Yes
1.1				
1.2				
1.3				
1.4				
2.1				
2.2				
2.3				
2.4				
2.5				
2.6				
2.7				
2.8				
2.9				
2.10				
2.11				
3.1				
3.2				
3.3				
3.4				
3.5				
3.6				
3.7				
3,8				
4.1				
4.2				
4.3				
4.4				

	A	B	C	D
	No	Partly	Almost	Yes
4.5				
4.6				
4.7				
5.1				
5.2				
5.3				
5.4				
5.5				
6.1				
6.2				
6.3				
6.4				
7.1				
7.2				
7.3				
7.4				
7.5				
7.6				
7.7				
7.8				
8.1				
8.2				
8.3				
8.4				

Signed …….. Date …….
Company ……