

The Fecc Responsible Care Report 2012

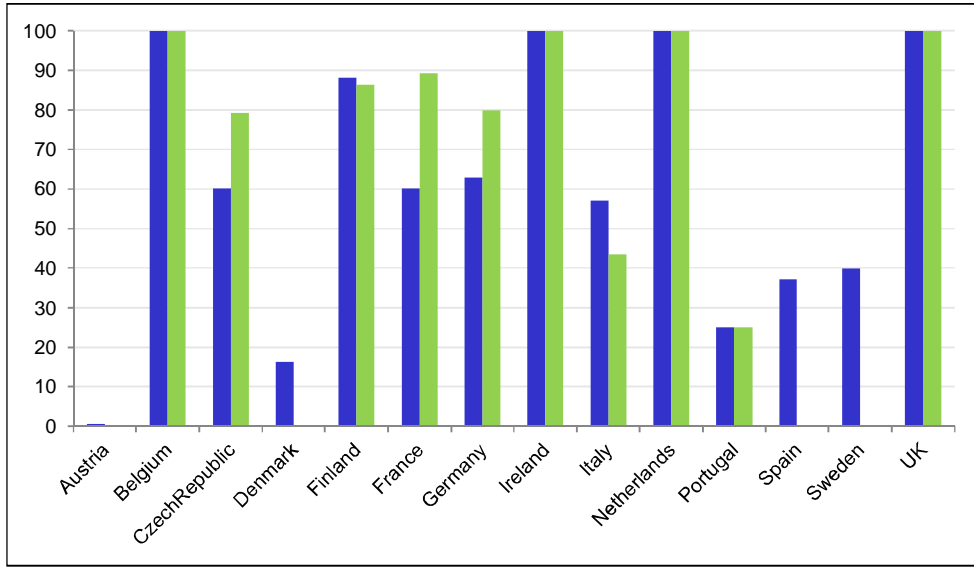
1. LEVEL OF RESPONSIBLE CARE IMPLEMENTATION IN EUROPE

The historical development of Responsible Care has been at the national level. The Fecc Member National Associations (NAs) have developed local RC programmes in line with ICCTA Joint RC/RD Programme. In order to obtain the right to use the RC logo, the NA must comply with the Responsible Care rules and sign a partnership agreement with the local manufacturer's association, endorsed by Fecc & Cefic.

Each year Fecc collects a series of statistical data from its National Associations and Company Members. The collection, analysis and interpretation of this data allows Fecc to draw conclusions in different areas for example Responsible Care and its KPI (Key Performance Indicators).

Regarding Responsible Care implementation, the percentage of Distribution companies belonging to this voluntary initiative is on average around the 50%. Nevertheless in Figure 1 the Responsible Care Implementation in Europe is shown and we can observe that in Belgium, Ireland, The Netherlands and the United Kingdom the Responsible Care membership is 100%. Moreover, across the Fecc membership, 72% of the total number of employees belongs to the different National Associations Responsible Care Programmes (see Figure 2).

Again this year, special attention should be drawn to the case of the Austrian National Association (WKO) where only one company out of 200 Chemical Distributor companies has a commitment to Responsible Care. Switzerland does not report RC data as this country reports to the European Council of Chemical Manufacturers (Cefic) instead.



■ % RC Companies in NA membership (2011 data) ■ % RC Companies in NA turnover (2011 data)

Fig. 1: Level of RC implementation (Fecc NA membership – 2011 data)

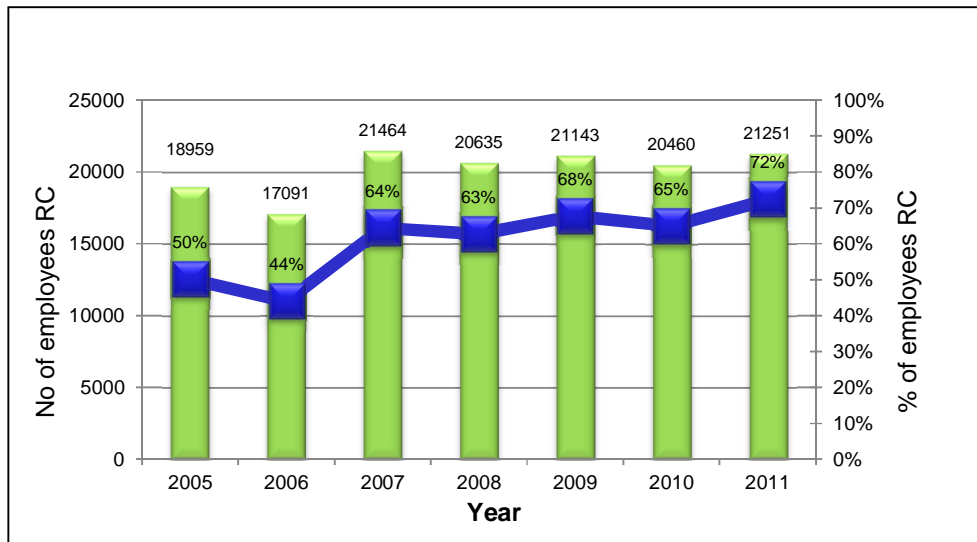


Fig. 2: Number of employees belonging to Responsible Care (Fecc NA membership – 2011 data)

In the field of “Risk Management” there has been a decrease in the number of transport incidents and a reduction in the number of incidents on site company’s premises. After an initial period of increases and decreases in the number of incidents, since 2008 we have a similar trend with a decrease on the number of them (see figures 3 and 4).

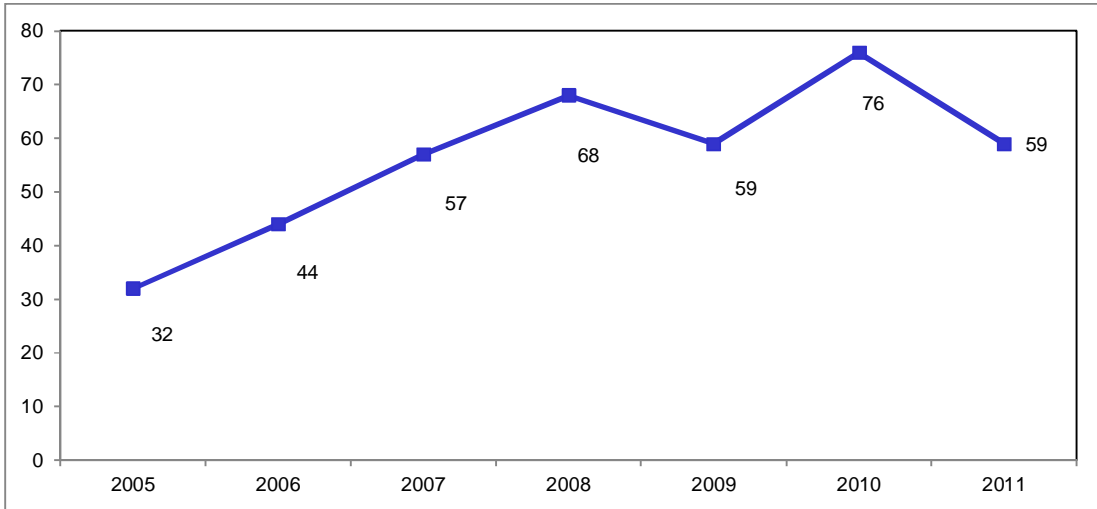


Figure 3: KPI - Total number of incidents in transport

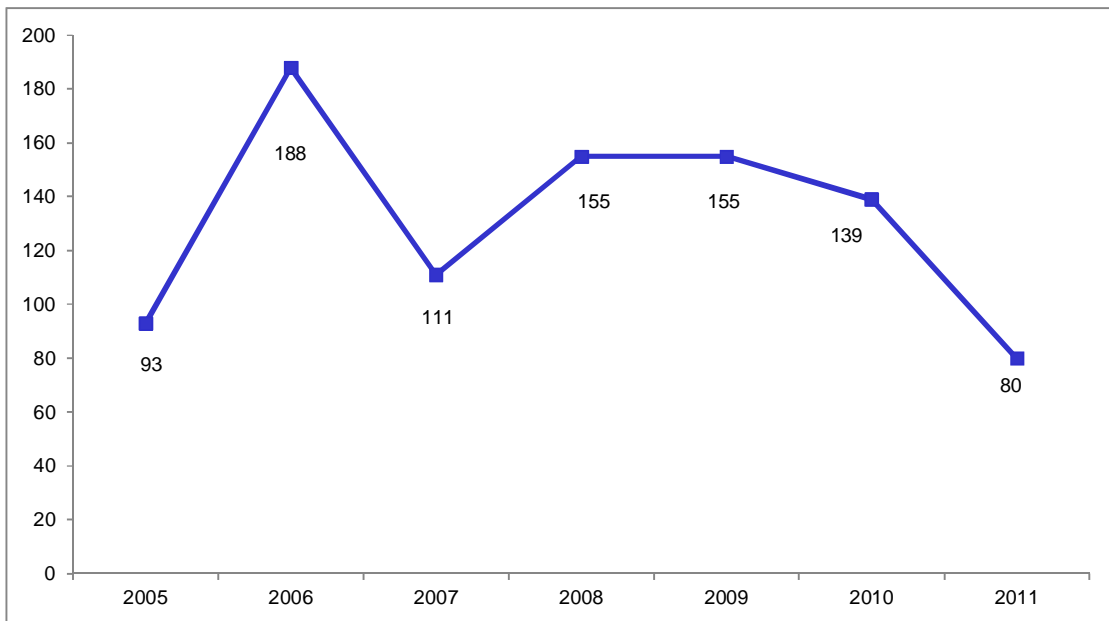


Figure 4: KPI - Total number of incidents on site company's premises

2. ADDRESSING THE NEEDS OF THE Fecc MEMBERS

2.1 The Fecc European Responsible Care Programme

The programme's core principles are based on the eight guiding principles of the International Council of Chemical Trade Associations' (ICCTA) joint Responsible Care & Distribution Programme.

- The Programme offers harmonized implementation in Europe and it is tailor-made for the distribution sector. The Programme offers appropriate tools to demonstrate distributors' responsible handling and use of chemicals. Moreover, it simultaneously addresses the stakeholders' expectations about the distributors' activities.
- The key element of the Programme is the mandatory Third Party Verification (TPV) of the company's compliance with RC requirements, (e.g use of SQAS Distributor/ESAD system as one of the possible tools for TPV).
- The Fecc European Responsible Care Programme is addressed to distributors in countries where no chemical distributor association exist, such as Central and Eastern Europe countries. In addition to this option, NAs have the possibility to use the Programme as their own or they can outsource their RC activities to Fecc. The Programme also addresses Pan-European companies that – with previous authorisation of their NA - may apply to Fecc for the RC programme in the countries where RC is already run by NAs.

2.2 Fecc European RC Programme implementation

We are glad to report that this year **AECQ** (Spanish NA) and **Groquifar** (Portuguese NA) have adopted the Fecc European Responsible Care Programme for their members, with mandatory TPV. Fecc has been helping both NA in their first steps towards the implementation, and has participated as well in the information sessions that AECQ and Groquifar have organized in order to promote their new Responsible Care Programme.

Regarding the implementation of Responsible Care within Fecc direct company members, we are happy to say that new sites in mainly Eastern European countries have joined the Fecc European Responsible Care Programme.

The past year, 2011, was an excellent and record breaking year regarding applications received to join Responsible Care on a temporary basis: over 15 applications (the Fecc Responsible Care Programme allows this situation during one year until a TPV is scheduled/takes place). During 2012 all those subsidiaries from Azelis, Brenntag, CH Erbsloh and HSH Chemie have been performing their ESAD assessments and developed improvement plans. Therefore the Fecc Responsible Care Committee has been authorizing them during 2012 as full right Responsible Care company subsidiaries.

2.3 SQAS Distributor/ESAD and Responsible Care

Since 2004, ESAD is a joint initiative of the chemical manufactures (Cefic) and distributors (Fecc) that offers a tool for assessing HSE standards of the chemical distribution companies. Moreover, ESAD is designed around the Eight Guiding Principles of the ICCTA Joint Responsible Care/Responsible Distribution Programme and therefore offers an excellent TPV for the distributors' compliance with Responsible Care programme.

An SQAS Distributor/ESAD assessment does not lead to a certificate but offers a detailed factual report which each chemical company needs to evaluate according to its own requirements.

Key principles of ESAD:

- Eight RC guiding principles as specified in the ICCTA programme are included
- The report stays valid for three years
- An improvement plan can be uploaded in the relevant section of the report
- Reports are digitally available
- Reports can only be seen to selected users (e.g. Fecc) who have been granted access to the individual report

In Fig. 5 the number of active ESAD reports by country (2006 – 2011) can be seen:

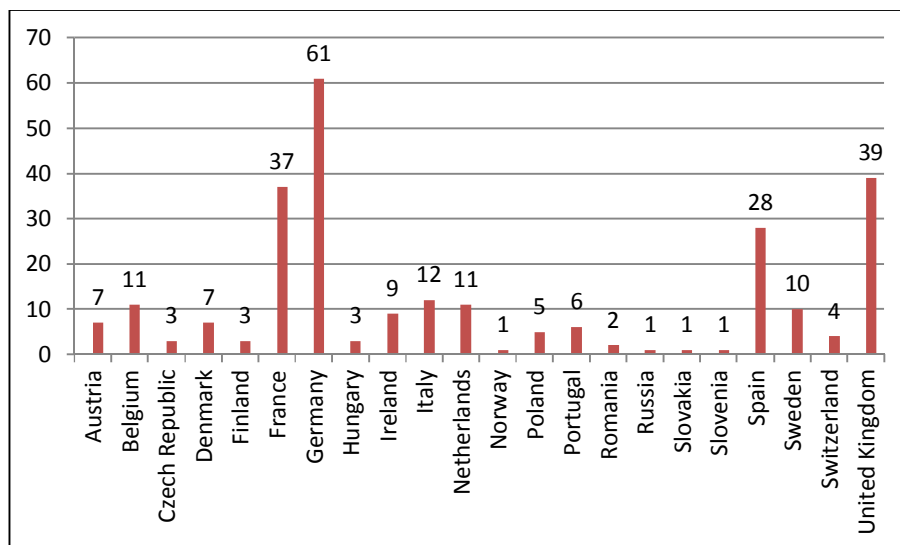


Figure 5: Number of active ESAD reports by country (2006 – 2011)

In Figure 6 the number of assessments per module/year is represented. We can see that since 2009 the number of ESAD assessments has decreased, however we should think about the fact that ESAD is a three year cycle system therefore in 2012 the number of ESAD assessments has increased (102 YTD)

– 31 December 2012) and is about the same magnitude that the number of assessments that took place in 2009 (111).

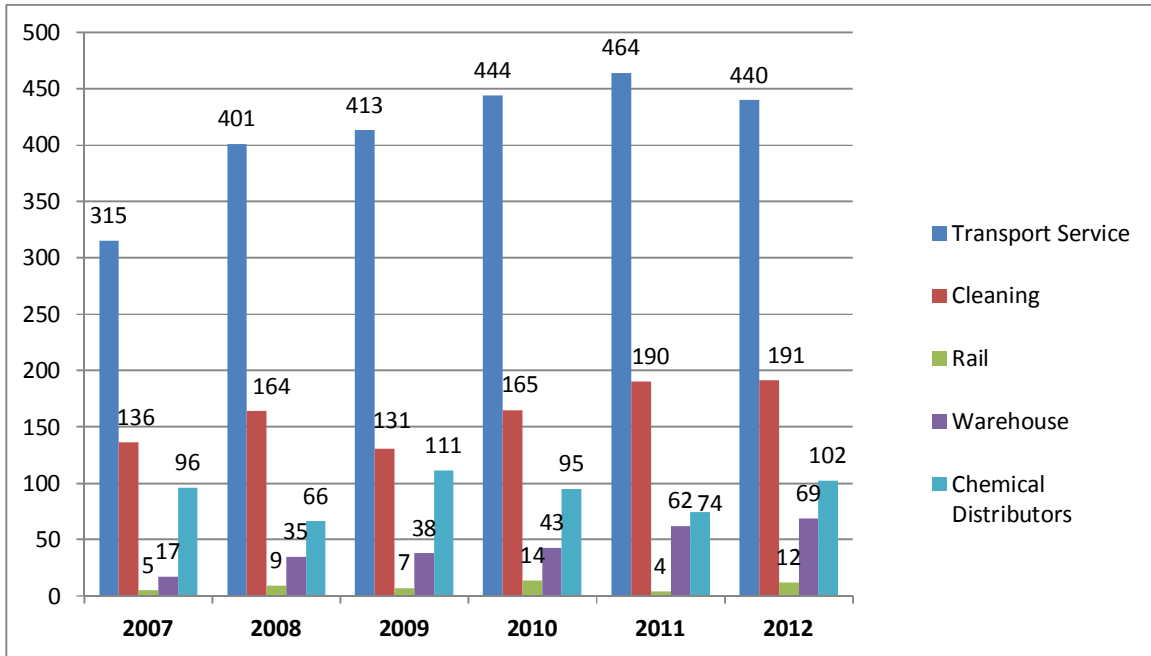


Figure 6: Number of SQAS Distributor/ESAD assessments per module per year (2007 – 2012)

After the complete review of SQAS/ESAD scheme that took place in 2011, an open general accreditation training for new assessors and examinations took place in early June 2012. There were 13 candidate SQAS Assessors.

Out of territory Assessments:

Since the implementation of SQAS 2011 new and stricter rules for “out of territory” assessments have been set. Assessors must master the local language and know the local legislations to perform assessments. If this is not the case, the accredited assessor must be accompanied by a local specialist that covers these gaps.

2.4 Commitment to sustainability

The Fecc RC Programme complies with the ICCA Global Charter. The Fecc signature is our contribution and commitment to harmonise and improve HSE standards for distribution across Europe and to strengthen the commitment to sustainability. The dimensions of sustainability, such as environmental, social and economic aspects, are of significant importance for Fecc. They are incorporated into the Programme via regular reporting of industry’s KPIs, presence of the improvement plan, regular exchange of best practices, and interaction with the general public.

3. Fecc Responsible Care Seminar

As every year, the Fecc Responsible Care Committee organized a Responsible Care Seminar in Brussels (13 December) after the Responsible Care Committee meeting on that day.

The implementation of Responsible Care in National Associations and companies was discussed. Speakers from National Associations (VHCP – The Netherlands, BACD – Belgium and AssICC – Italy) as well as from company members (Azelis, Brenntag, CH Erbsloh and HSH Chemie) gave very interesting presentations on how they manage to implement Responsible Care within their membership and companies explained how they coordinate the different aspects of Responsible Care.

During the seminar, we counted as well with the presence of two Cefic representatives: Isabelle Chaput (Cefic Sustainable Development Director) and Sjoerd Looijs (Cefic RC Manager). They explained the links between Sustainability and Responsible Care and how to have a better cooperation between manufacturers and distributors.

Fecc RC Committee

The Fecc Responsible Care Committee is composed of Company Responsible Care coordinators and National Association Responsible Care managers.

Since December 2011 the Responsible Care Chairman is Robert Stuyt, Secretary General of the Dutch National Association of Chemical Distributors (VHCP).

The Fecc Secretariat and the Responsible Care Committee offers support and practical help to the companies and NAs with the implementation of the Responsible Care.