

**International Chemical Trade Association**

**A Joint  
Responsible Distribution /  
Responsible Care Programme**

**REVISED VERSION  
APPROVED – ICTA COUNCIL  
November 2016**

Responsible Distribution Process <sup>SM</sup>

Responsible Care<sup>®</sup>

Responsible Distribution <sup>®</sup>

# CONTENTS

I.	Introduction .....	3
II.	The role of the National Associations.....	5
III.	The Joint Programme .....	7
Appendix A	Eight Guiding Principles.....	14
Appendix B	Chief Executive’s Commitment .....	15
Appendix C	Self-assessment Questionnaire .....	16
Appendix D	ICTA Annual Report Of IoPs .....	22

## **I. INTRODUCTION**

### **A. Background**

Responsible Distribution/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.

This Programme, first initiated in 1996, has been updated in the light of recent developments and is based on the fundamental features of Responsible Care. The Programme allows for differences of approach of Responsible Distribution in North America and Responsible Care in Europe and as a joint ICTA Programme is operational on a global basis. This updated approach has the advantage of promoting uniform operating practices for chemical distribution on a worldwide basis.

### **B. Overview**

The programme is based upon the fundamental features of Responsible Care as outlined below:

- Establishing and implementing a set of Guiding Principles
- Adopting a title and logo
- Implementing management practices through a series of codes, policies and guidance documents to assist companies to achieve better performance
- Developing a set of progressive performance indicators
- Communicating with interested parties inside and outside the membership
- Sharing best practice through information networks
- Encouraging all association member companies to commit to and participate in Responsible Distribution/Responsible Care
- Introducing and implementing systematic procedures to validate the implementation of the key elements of Responsible Distribution/Responsible Care by member companies

All these features are explained in more detail later in this document.

### **C. Approaches**

There are primarily two distinct approaches:

1. The **prescriptive approach** which charges the National Association with setting out Guiding Principles and Codes of Conduct
2. The **goal-orientated approach** which charges the National Association with setting out Principles and allowing Member companies to set out their own plans to meet those Principles.

The document organises the fundamental Programme in a way that ensures both initiatives are recognised and acceptable (Responsible Distribution Process<sup>SM</sup> and Responsible Care<sup>®</sup>).

This goal-orientated approach does not restrict **current good practice** and allows **best practice** to evolve with time.

The detailed implementation of this initiative by ICTA National Associations and their member companies will vary in accordance with national cultures and circumstances. However, this Programme needs to address certain operating parameters including:

- A formal commitment to the guiding principles shall be signed by the Chief Executive Officer (CEO) of each member company
- A series of codes/guidance notes and assessment checklists to assist Member companies with implementing their commitment
- Development of a system of measurement of continual improvement, such as indicators against which improvements in performance can be measured.
- Continually improve the environmental, health, safety and security<sup>1</sup> knowledge and performance of our technologies, processes and products over their life cycles so as to avoid harm to people and the environment
- Meetings at which Member companies and Association can share views and exchange experiences concerning their commitment
- Report openly on performance, achievements and shortcomings
- Listen, engage and work with people 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 go beyond them
- Consideration of how best to encourage all Association Members' companies to commit to and participate in *A Joint Responsible Distribution/Responsible Care Programme*.

---

<sup>1</sup> The scope of the ICTA Guiding Principles commitment has been extended from safety understood as the historical protection of the health and safety of people and the environment from chemical related accidents or incidents, to also cover security understood as protection of employees, contractors, premises, property, products, proprietary information, IT systems and society from the misuse of chemicals for illegal purposes, such as illicit drugs or terrorist attack including, for example, chemical weapons or explosives precursors.

## **II. THE ROLE OF NATIONAL ASSOCIATIONS**

### **A. Scope**

All member companies who handle, store, transport, sell or cause products to be placed upon the market should belong to either Responsible Distribution or Responsible Care programmes.

### **B. Definitions**

1. Full company members sell or cause products to be placed upon the market. This definition covers office only companies as well as those who have operational facilities.
2. Associate company members handle, store, freight forward, or transport products but do not sell or place products on the market
3. Candidate members are in the process of joining and completing the requirements to become Full or Associate company members
4. Exempt company members provide a service to the industry but do not handle, sell or place products on the market. E.g. I T providers, label manufacturers etc.
5. Products are chemical substances or preparations whether classified as hazardous or not.

### **C. Integrity**

National Associations shall organise, promote and meet the practices set by the ICTA Joint Programme.

### **D. Requirements**

1. Every National Association will sign a letter of commitment to the ICTA Joint Programme as a condition of use of this programme.
2. Approval for the use of the appropriate logos will be demonstrated in one of two ways, either:
  - a. National Associations will sign a Partnership Agreement with their manufacturing Association to enable it to have the right to use the Responsible Care logo itself and authorise its use by its member companies who are in compliance with the principles of the joint ICTA Programme.
  - b. Compliance of the National Associations to the ICTA Joint Programme will either be by peer review (undertaken by correspondence, during conference calls or meetings) or an appropriate audit.

## **E. Milestones (staging posts)**

### Compliance Criteria:

1. Mandatory membership of Responsible Distribution/Responsible Care.

The National Association sets up a programme and member companies join on a voluntary basis. On reaching a critical mass, the National Association makes the membership of the programme a condition of membership.

Action. If the process takes too long, a letter of explanation could be required by ICTA.

2. Indices of Performance (IoPs).

The industry's reputation is judged both on its performance and effective communication of improvement trends. ICTA National Associations commit to the annual generation of performance data by their members, which will be reviewed for consistency by the National Associations before submission to ICTA. ICTA is committed to 100% returns from member companies, excluding those exempted from the programme, within four years.

3. Validation of this Programme.

National Associations are committed as a condition of their membership of this programme to move over time through more rigorous forms of validation defined in section E, 2 and 3.

Actions. If the process is not complete in four years, the situation will be referred to ICTA and the continued membership of the Responsible Distribution/ Responsible Care Joint Programme placed under review. Ultimately, ICTA could withdraw membership on the grounds of non-compliance with this Programme.

### **III. THE JOINT PROGRAMME**

The *Joint Responsible Distribution/Responsible Care Programme* consists of:

- A. Commitment
- B. Basic organisation
- C. Self- assessment
- D. Improvement plans
- E. Validation
- F. Indices of Performance
- G. Managing the integrity of the Programme and action on non-conformance
- H. Product Stewardship
- I. Security
- J. On going development of this Programme

#### **A. Commitment**

The Principles are to be given headings and defined in such a manner as to reflect both the needs of the ICTA National Associations and those of its Members, such that they are acceptable to all National Associations in ICTA in a reciprocal form. The CEO of each participating member company shall commit to these principles in writing.

Where the Programme has Eight Guiding Principles (Appendix A), the C E O of each participating member company shall sign the formal commitment (Appendix B).

#### **B. Basic organisation**

The CEO shall monitor the progress of the Programme within the company. To do this, a Programme Co-ordinator / Responsible Care Co-ordinator (PC/RCC) is appointed within the company and authority is defined.

The CEO will set the ratio of monitoring/advice.

### **C. Self- Assessment**

All member companies will complete on joining the programme at least a Self-Assessment Questionnaire' (SAQ), or will proceed to a more rigorous system of validation as detailed in section 5. In all cases the replies need to have a scoring system so that the % compliance can be completed and recorded. This result will then act as the base benchmark from which to measure continual improvement.

The Programme's SAQs are linked to the Eight Guiding Principles shown in Appendix A.

### **D. Improvement Plans and Codes of Practice (COPs)**

National Associations shall use one of these two systems:

#### **1. Improvement Plans.**

The deficiencies revealed by the completion of the SAQ will show any weaknesses within the company and a plan shall be written to address these weaknesses.

It is prudent to link these plans directly to the SAQs, as this will facilitate measuring continual improvement.

Three Year Improvement Plans should be created with an annual review so that the Three Year Plan is rolling, reviewed and if necessary re-written each year.

#### **2. Codes of Practices.**

Membership in a National Association shall be contingent upon completion of milestones towards Third Party Verification.

Re-verification of conformance with a Code of Practice will occur on a regular cycle – typically three years.

It is prudent to link the codes of practice to measures (such as IOP's) to ensure continual improvement is achieved.

If a full member fails verification of the Programme, then successful re-verification must take place within one year. Failure of the re-verification means that full membership is terminated although at the discretion of the National Association, there may be a bona fide appeals process.



## **E. Validation**

There are three ways by which the Programme can be validated:

### 1. Self-assessment.

This requires completion and scoring of the SAQ by a company's assessor to measure compliance with this programme. This process is also known as first party assessment. This is the basic level of validation acceptable under this programme.

### 2. Trade Association scheme.

The National Association is responsible for validating the company's compliance with this programme e.g. using the SAQ.

Resources in the National Association have to be available for this scheme to be successful. This process is also known as second party assessment. This is the intermediate level of validation under the programme.

### 3. Third party assessment.

The compliance with this programme is validated by a third party using a suitable assessment system e.g. ESAD. The validation must verify that the company has implemented the measures covered by the improvement plan or changes in codes of practice. An essential element of this level is that the assessment takes place in the controlling office site and, where applicable, at least one sample operational centre e.g. warehouse / tank farm / distribution centre.

The output of this validation process may be in the form of:

- a) a compliance assessment report
- b) a verification (pass/fail)
- c) a certification by an authorised certification body

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

The following criteria need to be applied to evaluate independence and competence of the third party:

- a) the third party should have a significant source of income outside of the chemical industry
- b) the third party should receive specific training and refresher training on the Responsible Distribution/Responsible Care programmes. Where training is provided, the maintenance of training records is encouraged.

- c) In the case of Certification, the third party should be a registered certification body and an organisation 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.

## **F. Indices of Performance**

The chemical distribution industry is committed to report openly on performance, achievements and shortcomings. Over the years, ICTA has agreed a series of performance reporting criteria and these are set out in Appendix D.

## **G. Managing the Integrity of the Programme and Action on Non-conformance**

### **1. Sharing best practice.**

It is important in the management of the Programme to ensure that the PC/RCCs have the opportunity of discussing with each other and their Association their individual problems, three year Improvement Plans and ways in which continual development and improvement, in both their own activities and this Programme, can continue to take place.

### **2. The Logos.**

Member companies in compliance with the ICTA Programme, are encouraged to use of either the Responsible Care® logo, the Responsible Distribution Process<sup>SM</sup> logo (under a limited non-exclusive licence from NACD) or the Responsible Distribution® logo, because all of these Programmes are designed to achieve the same health, safety, security and environmental objectives.

Conformance with the principles contained within this Programme, supported by the required documentation submitted to the ICTA National Association, should enable both the ICTA National Association and their Member companies to reach agreement for either the Responsible Distribution Process<sup>SM</sup> logo (under licence), the Responsible Distribution® or the Responsible Care® logo to be used. Before an Association can use or allow the use of:

- a) The Responsible Care® logo, a Partnership Agreement has to be signed between the National Association and the chemical manufacturing association operating in that country.
- b) The Responsible Distribution Process<sup>SM</sup> logo, this has to be discussed between the Member Association and the National Association of Chemical Distributors (NACD). NACD will grant a limited non-exclusive licence to the ICTA Member Association, pursuant to a separate written licence agreement signed by NACD and the licensee Member Association, to use the Responsible Distribution Process<sup>SM</sup> logo if the ICTA Member Association is a Member in good standing within

ICTA, and the right to sub licence use to Member companies of the ICTA Member Association that do not have established distribution facilities in the United States. However, if a chemical distributor establishes or purchases distribution facilities in the United States, then the American entity would be required to achieve full compliance with NACD's Responsible Distribution Process <sup>SM</sup> as a condition of continued use of the Responsible Distribution Process <sup>SM</sup> logo in connection with its business operations and activities in the United States. Also, all usage of the Responsible Distribution Process <sup>SM</sup> logo will accompany a 'SM' to indicate that this service mark is a mark of the national Association of Chemical Distributors, Arlington, VA, USA.

- c) The Responsible Distribution® Logo, for legal reasons any ICTA Member Association wishing to use the Responsible Distribution trademarks must enter into a license agreement directly with the Canadian Association of Chemical Distributors (CACD) expressly for this purpose. These trademarks remain the sole property of the CACD. However, CACD will delegate authority to enable other ICTA associations to administer use of the trademark by its members. Conditions under which the trademarks may be used (permitted and non permitted uses) will be as specified in the standard license agreement. All usage of the Responsible Distribution logo will accompany an ® to indicate that this service mark is the service mark of the Canadian Association of Chemical Distributors. Applications for use will be sent to the Association offices in Oakville, Ontario, Canada.

In all instances the National Association's Programme must accord with the basic tenets of this generic Programme. Approval may then be given for the use of the logo(s) as detailed below.

3. Permission to use the logo(s).

The National Association's Programme must clearly state at what stage a member Company can use the logo and the terms and conditions for its continued use. The letter authorising the use of the logo should be prepared in duplicate to allow the CEO to sign the company's commitment and return one copy to the National Association.

The letter giving permission to use the logo should specify:

- a) IoPs, revalidation reports and Improvement Plans to be submitted in a timely manner
- b) PC/RCC to attend relevant workshops and meetings

- c) Review of status if company changes its name or a major shareholder
  - d) Guidelines on the use of the logo including what is allowed and what is prohibited
  - e) The layout, size and colour scheme for the logo
4. Withdrawal of permission to use the logo(s).

The integrity of the ICTA Responsible Distribution/ Responsible Care Programme is at stake if member companies do not comply with its requirements and its protocols. Therefore it is essential that when permission is given to use the logo, the letter also sets out the unacceptable activities that will result in the permission to use the logo being withdrawn by the National Association. These unacceptable activities and occurrences should include at least:

- a) Multiple Enforcement orders or prohibitions by Authorities
- b) Failure to supply annual IoPs in a timely manner
- c) Submit knowingly false information
- d) Submit IoPs that show increasingly poor performance
- e) Failure to submit Improvement Plans
- f) Failure to submit a revalidation reports when requested
- g) Failure to implement the spirit of Responsible Distribution/Responsible Care *and* bringing it into disrepute
- h) Lack of attendance at appropriate workshops
- i) Member Company resigns or goes into receivership
- j) Misuse of the logo

In the event of the National Association deciding to withdraw permission to use a logo because of ongoing infringements, it is essential to have an effective and clearly defined appeals procedure in each ICTA National Association, such that the offending company can, if they wish, appeal to a higher authority as a true arbiter.

## **H. Product Stewardship**

Product Stewardship, in some instances is regarded as being a separate issue, it is seen by ICTA as a requisite and ethical part of the Responsible Distribution/Responsible Care Programme. The exact relationship between the ICTA Programme and Product Stewardship is currently being developed.

## **J. Security**

National Associations are committed to the support of industry practices that address site and transportation security whether incorporated in to Responsible Distribution or through local industry or government programmes. Management security practices should be subject to regular assessment, preferably through a third party validation.

## **K. On going Development of this Programme**

Not only is Responsible Distribution/Responsible Care an ethic and a commitment it also has to be dynamic if it is to stay at the cutting edge of effectiveness. To achieve this, it must have regular input from its National Associations and their member companies. CEOs and Programme Coordinators have a duty to maintain integrity and share best practice within the ICTA umbrella.

In addition, there is also a commitment to communicate the Responsible Distribution/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.

## EIGHT GUIDING PRINCIPLES

Member companies are committed to:

1. Legal requirements.

Conform with all legal regulations and requirements and should operate in accordance with both government and industry codes of practice and guidance associated with their chemical activities.

2. Management of risk.

Ensure that their activities do not present an unacceptable level of risk to employees, contractors, customers, the public or the environment.

3. Policies and documentation.

Have written documentation, which covers their activities, and ensure that their health, safety, security and environmental policies reflect their commitment to *A Joint Responsible Distribution/Responsible Care Programme* as an integral part of their business strategy.

4. Provision of information.

Provide relevant health, safety, security and environmental information on company products and activities to employees, contractors, customers, statutory bodies and the public

5. Training.

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, security and environmental objectives.

6. Emergency response.

Establish and maintain an appropriate emergency response system.

7. Ongoing improvements.

Support and participate in those activities that will improve the quality of their own operations and strengthen health, safety, security and environmental consciousness and awareness.

8. Community interaction.

Maintain an awareness of and respond to community concerns that relate to their activities.

## CHIEF EXECUTIVE'S COMMITMENT

Members commit themselves to managing their actions (so far as is reasonably practicable) in the handling, movement and storage of chemicals and chemical products such that they present an acceptably high level of protection for the health, safety and security of employees, customers, the public and the environment.

Members must conform to all legal regulations and requirements and should operate in accordance with both government and industry codes of practice and guidance associated with their chemical activities.

They are committed to:

- Conform to all legal regulations and requirements and should operate in accordance with both government and industry codes of practice and guidance associated with their chemical 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, which covers their activities, and ensure that their health, safety, security and environmental policies reflect their commitment to *A Joint Responsible Distribution/Responsible Care Programme* as an integral part of their business strategy.
- Provide relevant health, safety, security 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, security and environmental objectives.
- Establish and maintain an appropriate emergency response system.
- Support and participate in those activities that will improve the quality of their own operations and strengthen health, safety, security and environmental consciousness and awareness.
- Maintain an awareness of and respond to community concerns that relate to their activities.

The Chief Executive of .....  
(name of company)

commits this Company to compliance with the above Guiding Principles.

.....  
(Signature of Chief Executive)

Address .....

.....Post Code .....

Telephone ..... Fax .....

E-mail .....

Date .....



## SELF-ASSESSMENT QUESTIONNAIRE

Apart from the very first question in this Self-Assessment Questionnaire, all the other questions should provide answers that 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 that are in accord with your written procedures, policies and standards

These figures give an indication that 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, security 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, security 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 a security policy?
- 3.3 Does the company have an environmental policy?
- 3.4 Does the company have a quality policy?
- 3.5 Do policy statements define company objectives and embody the principles of a *Joint Responsible Distribution/Responsible Care Programme*?
- 3.6 Are policy statements reviewed at regular intervals?
- 3.7 Are policy statements brought to the attention of all personnel?

- 3.8 Are policy statements supported by effective management systems?
- 3.9 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, security and environmental information on the products it handles?
- 4.2 Are employees provided with information on the health, safety, security 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, security and environmental information?
- 4.5 Are customers supplied with adequate health, safety, security 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, security 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, security 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, security and the environment?

SELF ASSESSMENT QUESTIONNAIRE continued

	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				
3.9				
4.1				
4.2				
4.3				
4.4				

Signed .....

	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				

Date .....

Company .....

## ICTA ANNUAL REPORT OF IoPs

### Country and Name of Association

### FOCUS Date (for each country)

### Demographic Data

1	No. of Members	
2	RC/RD Condition of Membership	
3	No. Respondents	
4	% Respondents	
5	Total No. of Sites	
6	No. of Sites Reporting	
7	Total No. of Employees	In FECC, total no. of employees reporting
8.	No. Employees Reporting	is inconsistent – some countries report all members, some countries report RC companies only.

### Transportation Accidents

9	Total No. of Shipments	
10	Total tonnes shipped	
11	Total Accidents and Spills	In USA, this includes Transportation and Non-Transportation, but not environmental Accidents.

### Safety Issues

12	No. On-job lost time injuries	
13	No. of employee fatalities	

### Miscellaneous

14	No. of RC Companies	i.e. No. of members committed to 8 GPs and have an assessment system in place
15	Third Party Verification	
16	Partnership Agreement	