

## Responsible Care Report 2019

September 2020

V3 (Final)

### **Fecc RESPONSIBLE CARE REPORT 2019 (Data 2018)**

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## 1. Level of Responsible Care Participation in Europe (*Fecc* Membership)

The *Fecc* Member National Associations (NAs) have developed – over the last 20-25 years - local Responsible Care (RC) programmes in line with the *ICTA* Joint Responsible Care / Responsible Distribution Programme.

In order to obtain the right to use the Responsible Care logo, the NA must comply with the Responsible Care rules and sign a partnership agreement with the local manufacturers' association, endorsed by *Fecc* and *Cefic*.

Each year, *Fecc* collects a series of statistical data from its National Associations and Company Members (*Fecc* Survey). The collection, analysis and interpretation of this data allows *Fecc* to draw conclusions in different areas, amongst them Responsible Care and related KPIs (Key Performance Indicators). Regarding Responsible Care implementation, the percentage of distribution companies belonging to this voluntary initiative over the period 2009-2018 is 68%, while in 2018 the average amounts to 73%, roughly the same participation level as the last three years (see Figure 1).

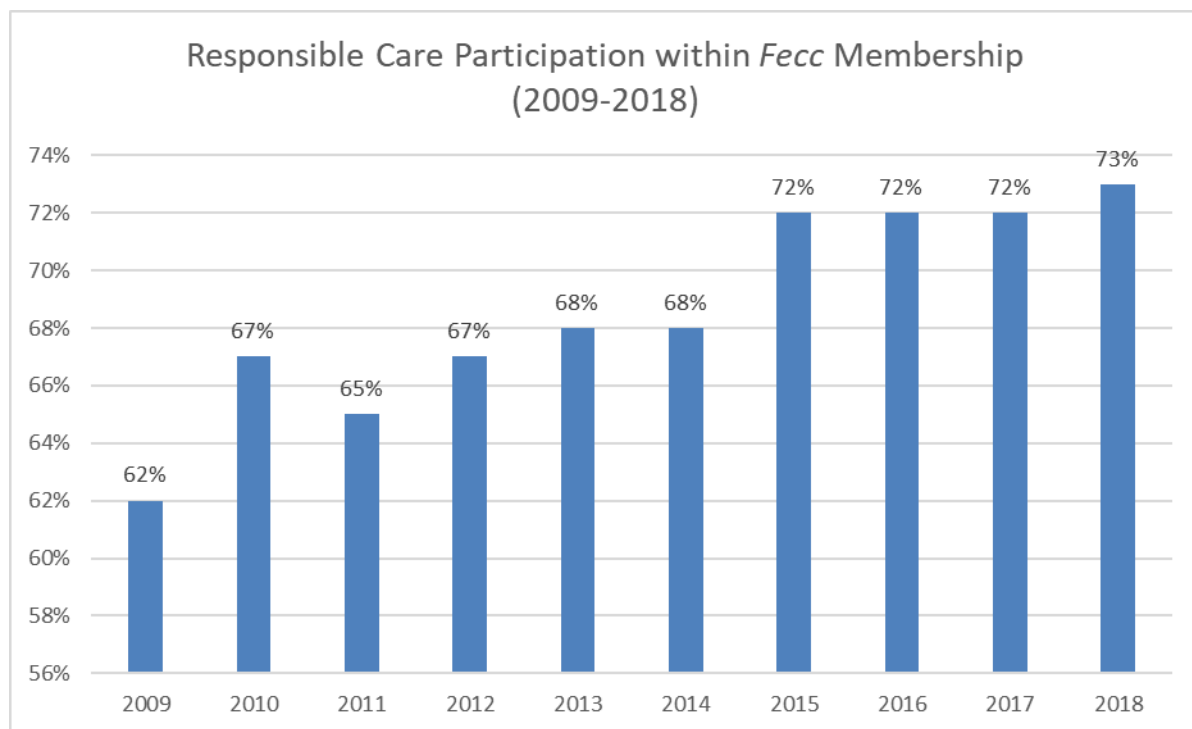


Figure 1: General Level of Responsible Care Participation in *Fecc* Membership (Data *Fecc* Survey 2019): Average per year in percentage.

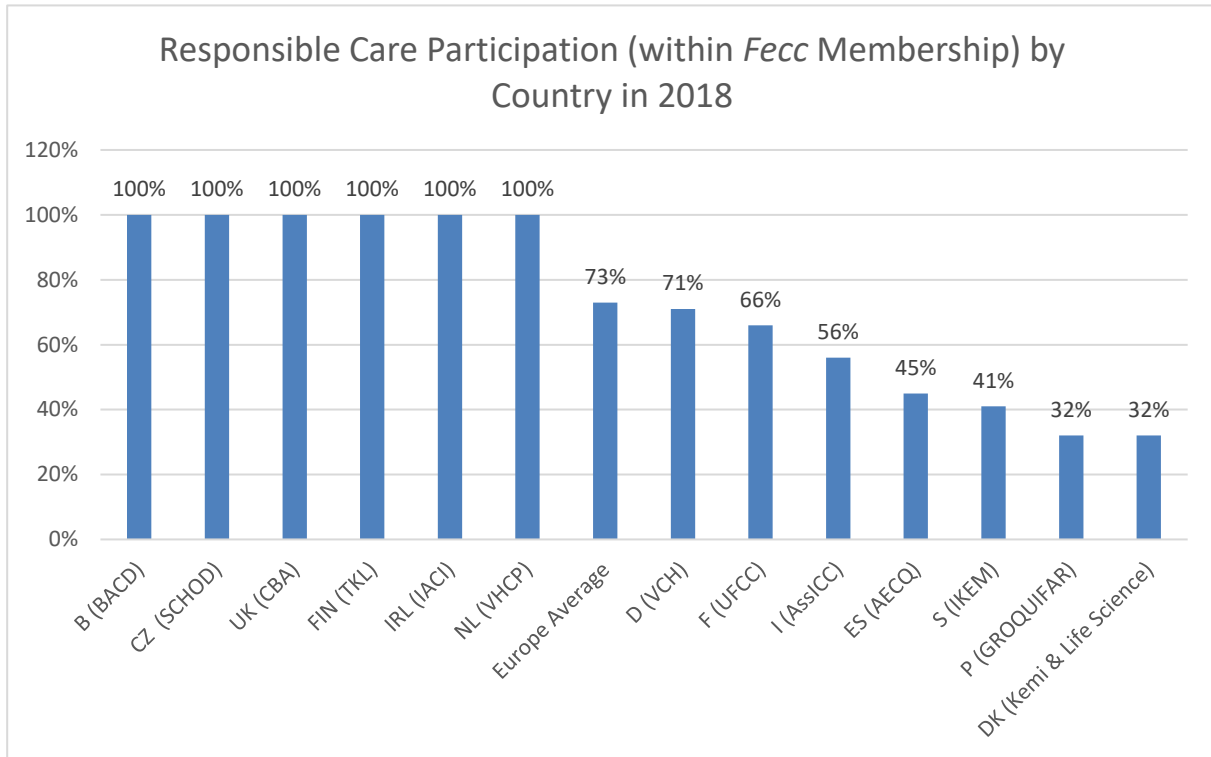


Figure 2: Level of Responsible Care Participation in Europe (Fecc Membership) per Country (Data Fecc Survey 2019)

The second graph (Figure 2) displays the results by country in 2018 and illustrates that significant differences in terms of Responsible Care implementation still exist when looking at the situation country by country.

Compared to the previous year, a slight change in Denmark (increase) and in Germany (increase) occurred. Regrettably, however, no substantial change can be observed across Europe. It is worth noticing that in Belgium, Ireland, The Netherlands, Czech Republic, and the United Kingdom the Responsible Care participation is at 100% - this is due to the fact that Responsible Care participation is mandatory for National Association membership. The Fecc Responsible Care Committee continues its efforts to improve the situation further and calls on the National Associations concerned to improve their commitment to Responsible Care.

The Tables in ANNEX I (pp. 15-17) show in detail the “hard figures” behind the percentage for each year. The calculation of the percentage per country is based on the figures provided by

the NAs. The second column refers to the survey question “number of distributors committed to Responsible Care”.

Finally, we should be aware of the fact that the graph does not show the Responsible Care performance of Austria (*Wirtschaftskammer Österreich, WKÖ*) and Switzerland (*Scienceindustries, SGCI*), as these are special cases. In Austria three companies out of a total of 225 chemical distributors have a commitment to Responsible Care, and Switzerland does not communicate Responsible Care data to *Fecc* as this country reports directly to the *European Council of Chemical Manufacturers (Cefic)*, but *SGCI* might communicate Responsible Care data additionally to *Fecc* in the future.

The figures and graphs in ANNEX II (pp. 18-21) reveal the level of performance in the period 2013-2018 as regards the 8 Guiding Principles.

With regard to ‘Risk Management’, the Lost Time Injury Rate (LTIR) used in our graph (see Figure 3) is defined as the number of accidents leading to a minimum of 3 lost work days per one million worked hours. The graph reveals a downward trend in the LTIR evolution from a peak in 2012 (10.86) to a European rate oscillating around 6.5 in the period 2013-2016 and a further decrease to 3.55 in 2018.

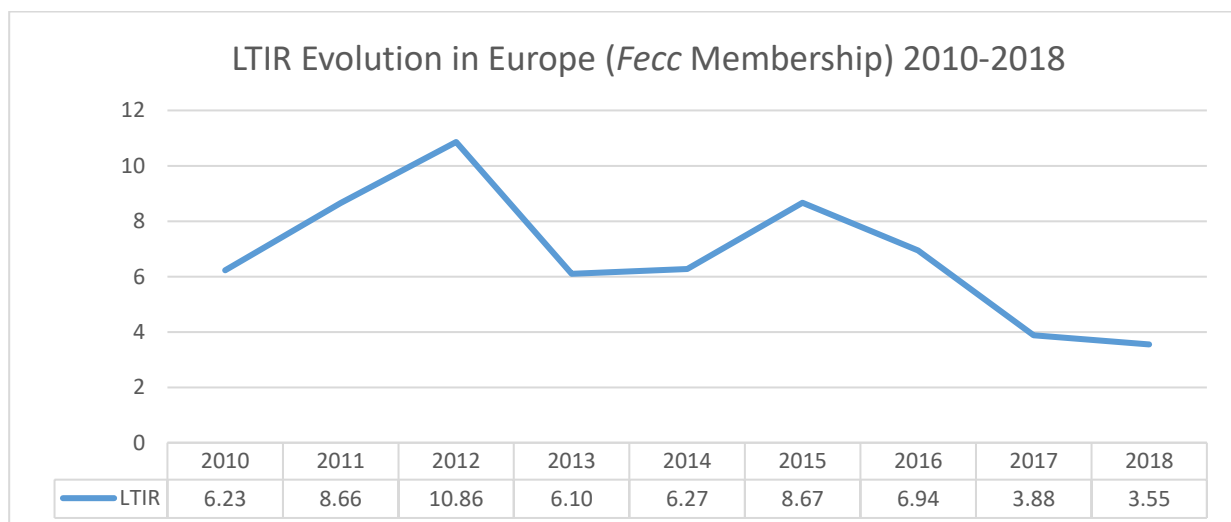


Figure 3: Average LTIR Evolution in Europe (Fecc Membership) 2010-2018 (Data Fecc Surveys 2011-2019).

Due to a lack of harmonization in Europe direct comparisons of the LTIR are difficult. However, it is possible to illustrate the trend by country in this field based on figures provided by the NAs, see ANNEX III (pp. 22-26).

The Secretariat will continue its analysis exploring how and to what extent the parameters in different countries differ, in particular whether the type of accidents/incidents communicated is comparable and how the number of working hours is counted. This research aims at harmonizing input parameters to enhance the comparability of data.

## **2. Review of the *Fecc* European Responsible Care Programme**

### 2.1. The *Fecc* European Responsible Care Programme

The Programme's core principles are based on the eight guiding principles of the *International Chemical Trade Association's (ICTA) Joint Responsible Care / Responsible Distribution Programme*. It offers harmonized implementation in Europe and it is tailor-made for the distribution sector. The Programme provides appropriate tools to demonstrate distributors' responsible handling and use of chemicals. Moreover, it simultaneously addresses the stakeholders' expectations about the distributors' activities.

One key element of the Programme is the mandatory Third-Party Verification (TPV) of the company's compliance with Responsible Care requirements (e. g. use of ESAD assessment system as one of the possible tools for a basis of TPV).

The *Fecc* European Responsible Care Programme is tailored for distributors in countries where no chemical distributor association exist, that is, especially Central and Eastern European countries. In addition to this option, NAs have the possibility to use the Programme as their own or they can outsource their Responsible Care activities to *Fecc*. The Programme also addresses Pan-European companies that — with previous authorisation of their NA - may apply to *Fecc* for the Responsible Care Programme in the countries where Responsible Care is already run by NAs. An amendment to the *Fecc* Responsible Care Programme, worked out by the Responsible Care Committee, and which is part of Version 2.3. since January 2016, introduces

– by exception – the possibility of a Second-Party Verification under certain conditions. This alternative has not been used yet.

## 2.2. Fecc European Responsible Care Programme Participation

As regards the *Fecc* European Responsible Care Programme, there is a small number of Pan-European distributor companies in the programme, with some entities ‘on hold’ for the time being. In 2019 one positive Evaluation Report was submitted to the Responsible Care Committee which approved the prolongation (3 years) of the use of the Responsible Care logo – confirmed in an Authorization Report and Responsible Care Attestation issued by *Fecc*. The Evaluation/Authorization Reports are an integral part of the Programme and are intended to analyse the company’s TPV assessment and improvement plans to enable a decision on granting permanent use of the Responsible Care logo.

Two NAs (*AECQ*, Spain and *BACD*, Belgium) have adapted the *Fecc* European Responsible Care Programme. One NA (*GROQUIFAR*, Portugal) uses the *Fecc* European Responsible Care Programme.

## 2.3. ESAD and Responsible Care

Since 2004, ESAD (European Single Assessment Document) is a joint initiative of the chemical manufactures (*Cefic*) and distributors (*Fecc*) that offers a tool for assessing Health, Safety, Security and Environmental Protection (HSSE) compliance of the chemical distribution companies. ESAD is designed around the Eight Guiding Principles of the *ICTA* Joint Responsible Care/Responsible Distribution Programme and therefore provides an excellent TPV tool for assessing the distributors’ compliance with the Responsible Care programme. A SQAS/ESAD Distributors 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 *ICTA* programme are included.
- Validity of the report is 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 by selected users (e.g. *Fecc*) who have been granted access to the individual report.

On 01 January 2019, the new [SQAS / ESAD Questionnaires 2019](#), replacing the revised version ESAD 2015 (integrating CSR/Sustainability issues and incorporating enhanced questions to address the European Commission requirements in terms of security), which will be used in all SQAS assessments, were launched (for more details see the embedded link).

*CBA* was actively engaged in *Cefic*'s development of the new SQAS/ESAD Questionnaires with *Fecc* support. *Fecc/CBA* participated particularly in the Core modules, as well as the Transport Service module. In this context, *Fecc*'s key objective remained to align the new Questionnaires with the new *TfS* (*Together for Sustainability*) Questionnaire and thus achieve recognition of ESAD by *TfS*. The SQAS Core has also now been adopted as the basis of the ESAD Questionnaire, supplemented by any questions in the Di document not covered in the SQAS Core. Existing questions and guidelines in ESAD 'Site' Questionnaire are now intelligently aligned/updated with revised Transport Service / Warehouse / Tank Cleaning modules content.

*Fecc/CBA* achieved recognition of ESAD 2019 by *TfS* on the same basis as the other modules. After final amendments, the revised *Cefic-SQAS and TfS Recognition Agreement* was published in June 2019.

Since 2018 new questions on alternative schemes (*Ecovadis*, *TfS*) are integrated into the *Fecc* Annual Survey – based on the analysis of a *TfS*-ESAD Survey among Committee Members.

In 2018, a [Joint Cefic-Fecc Recommendation](#) to combine ESAD Assessments with ISO Certification Audits was published .

In the framework of the SQAS/ESAD 2019 Revision, *CBA/Fecc* made presentations at the three SQAS Re-Accreditation Assessor Trainings in November 2018, explaining the major changes in the new ESAD Questionnaires. The same type of training, but for new assessors, was organized in March 2019, including a presentation from *CBA* on the revised ESAD Questionnaire. The organization of an ESAD F&G Workshop & Training for Assessors, at a

Hedinger (Fecc Member Company) site in Central Germany in conjunction with Cefic and an external consultant is in the planning phase and scheduled for January 2020.

Regarding SQAS/ESAD data, the data cycle is consistent with the three-year cycle of assessment renewals (see Figures 4-7 below).

Figure 7 breaks the total number of Active ESAD Reports in 2016-2018 down to country level – with a variation spanning from 1 (Hungary, Norway, Sweden) to a maximum of 22 (Germany in 2018).

	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018
Transport Service	401	413	444	464	440	504	551	510	544	572	573
Cleaning Stations	164	131	165	190	191	197	221	190	245	253	248
Rail Operators	9	7	14	4	12	30	17	20	37	17	30
Warehouses	35	38	43	62	69	45	78	73	64	85	77
ESAD (Distributors)	66	111	95	74	102	120	63	110	89	44	92
<b>Total</b>	<b>675</b>	<b>700</b>	<b>761</b>	<b>794</b>	<b>814</b>	<b>896</b>	<b>930</b>	<b>903</b>	<b>979</b>	<b>971</b>	<b>1020</b>

Figure 4: Number of SQAS Assessments per Module and Year (Cefic SQAS/ESAD Statistics) – Table.

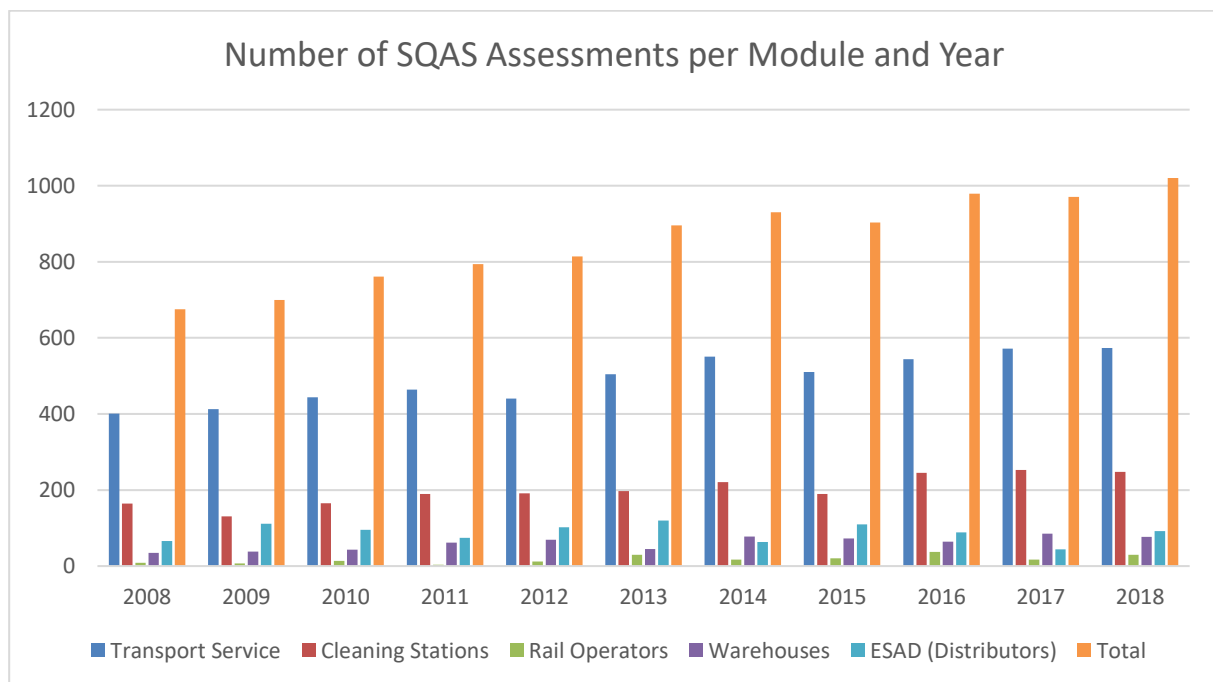


Figure 5: Number of SQAS Assessments per Module and Year (Cefic SQAS/ESAD Statistics) – Graph.



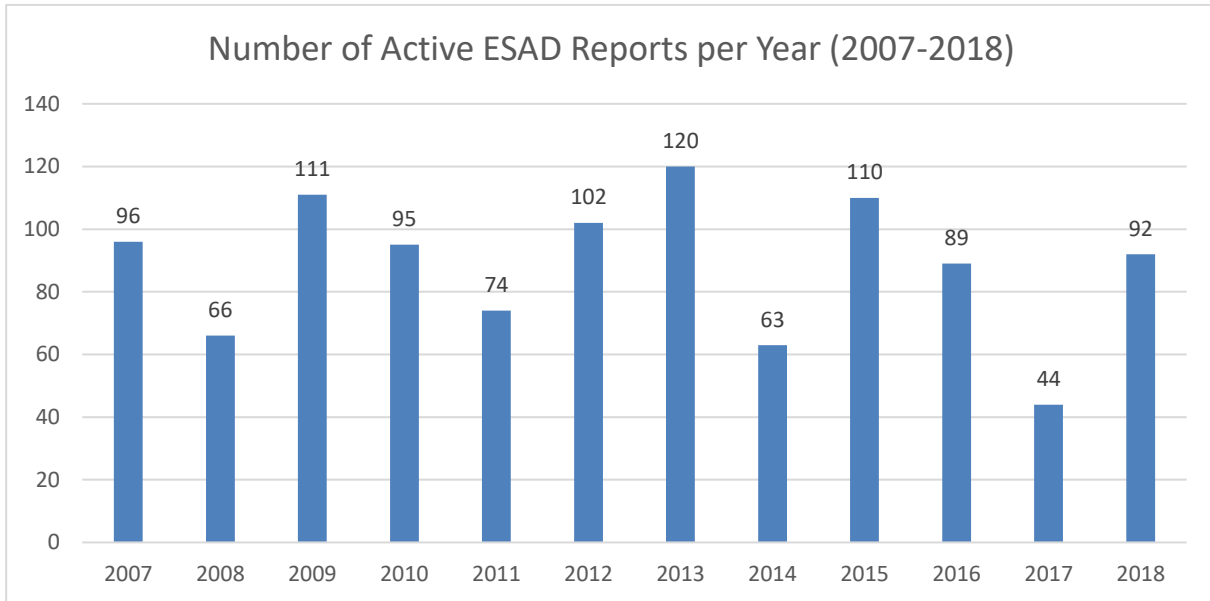


Figure 6: Number of Active ESAD Reports per Year (Cefic SQAS/ESAD Statistics).

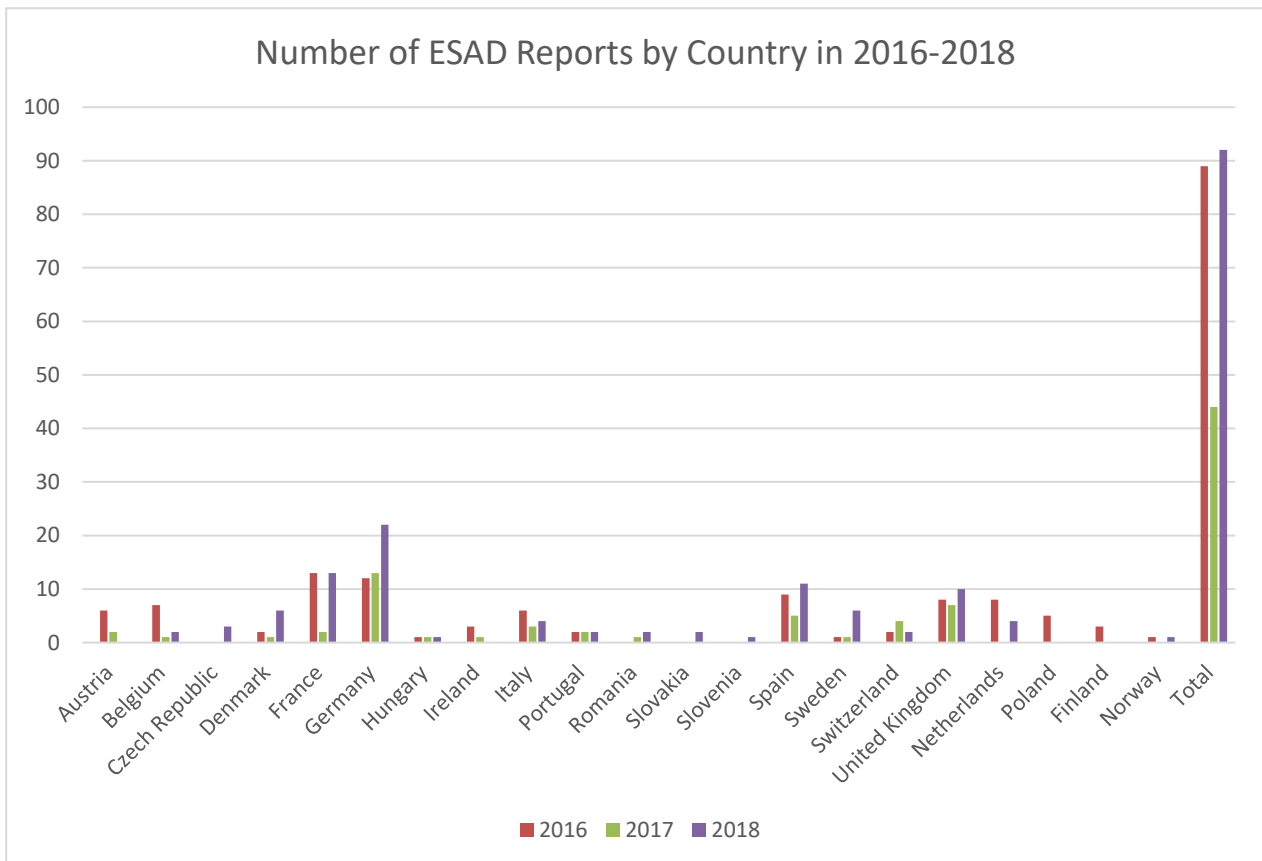


Figure 7: Number of Active ESAD Reports by Country in 2016-2018 (Cefic SQAS/ESAD Statistics).

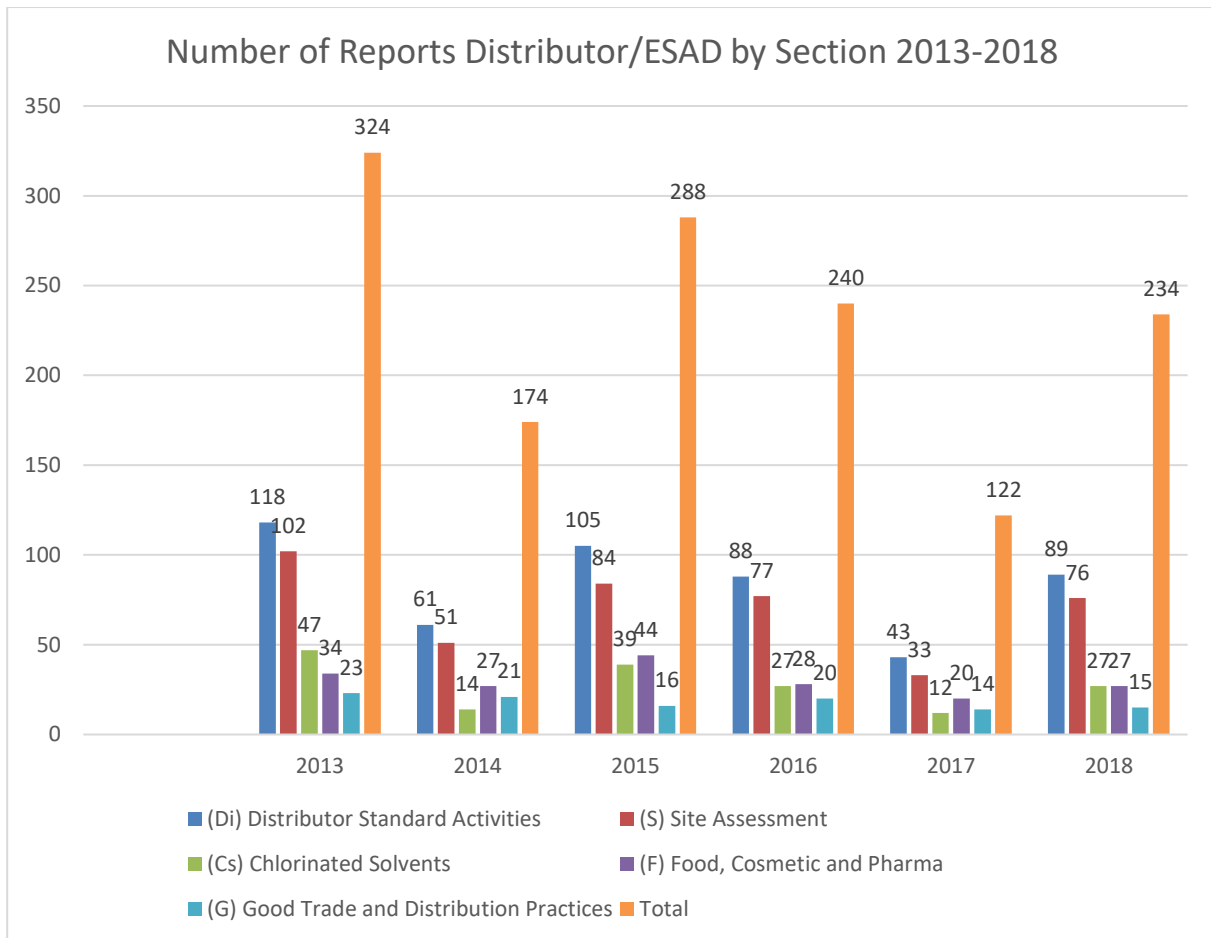


Figure 8: Number of Reports in Distributors/ESAD in 2013-2018 (Cefic SQAS/ESAD Statistics).

A closer look at the Distributors/ESAD module by section (Figure 8) reveals that 89 ESAD reports were registered in Di (Distributor Standard Activities), and

- 76 in S (Site),
- 27 in CS (Chlorinated Solvents),
- 27 in F (Food, Cosmetics and Pharma),
- 15 in G (Good Trade and Distribution Practices).

Added up, this amounts to a total of 234 reports in 2018, compared with a total of 122 in 2017 and 240 in 2016, illustrating a high degree of fluctuation over time.

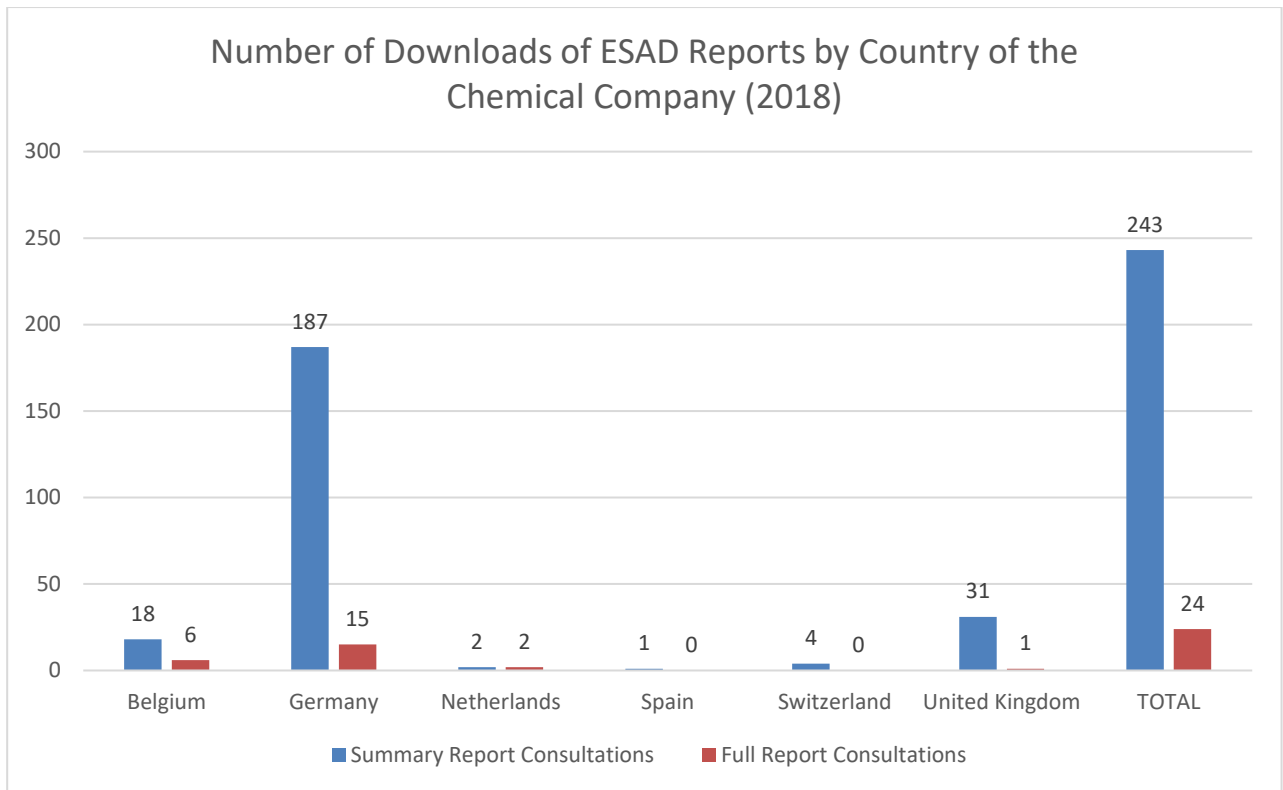


Figure 9: Number of Downloads of ESAD Reports by Country of the Chemical Company (2018)

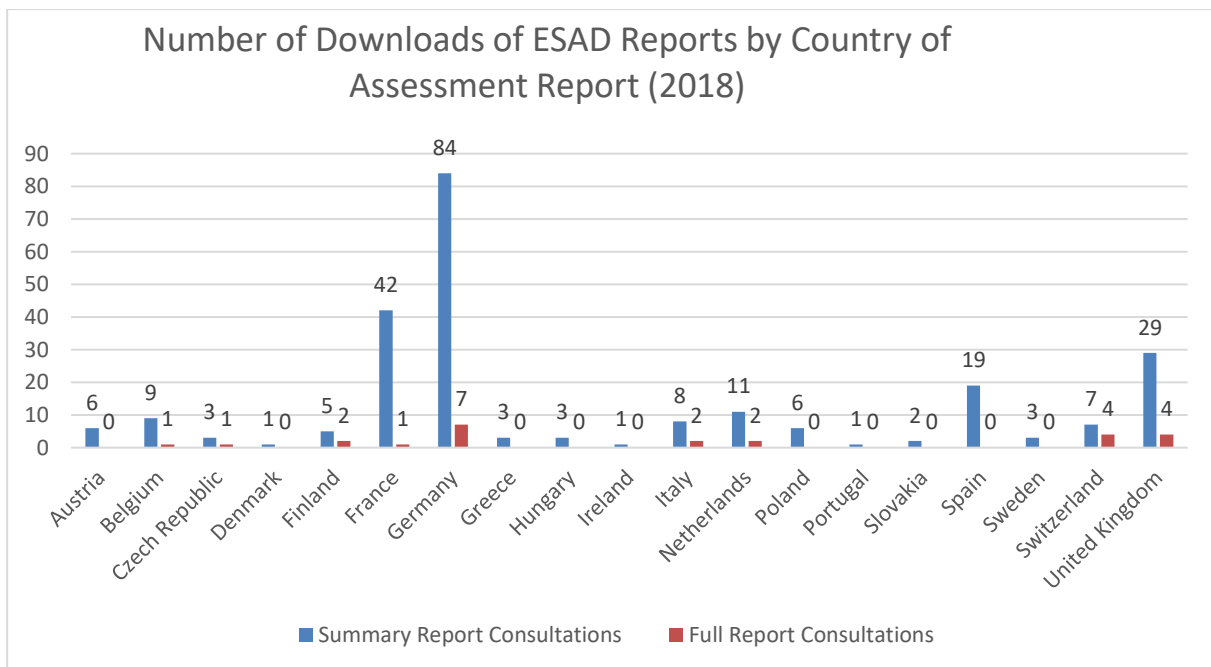


Figure 10: Number of Downloads of ESAD Reports by Country of Assessment Report (2018)

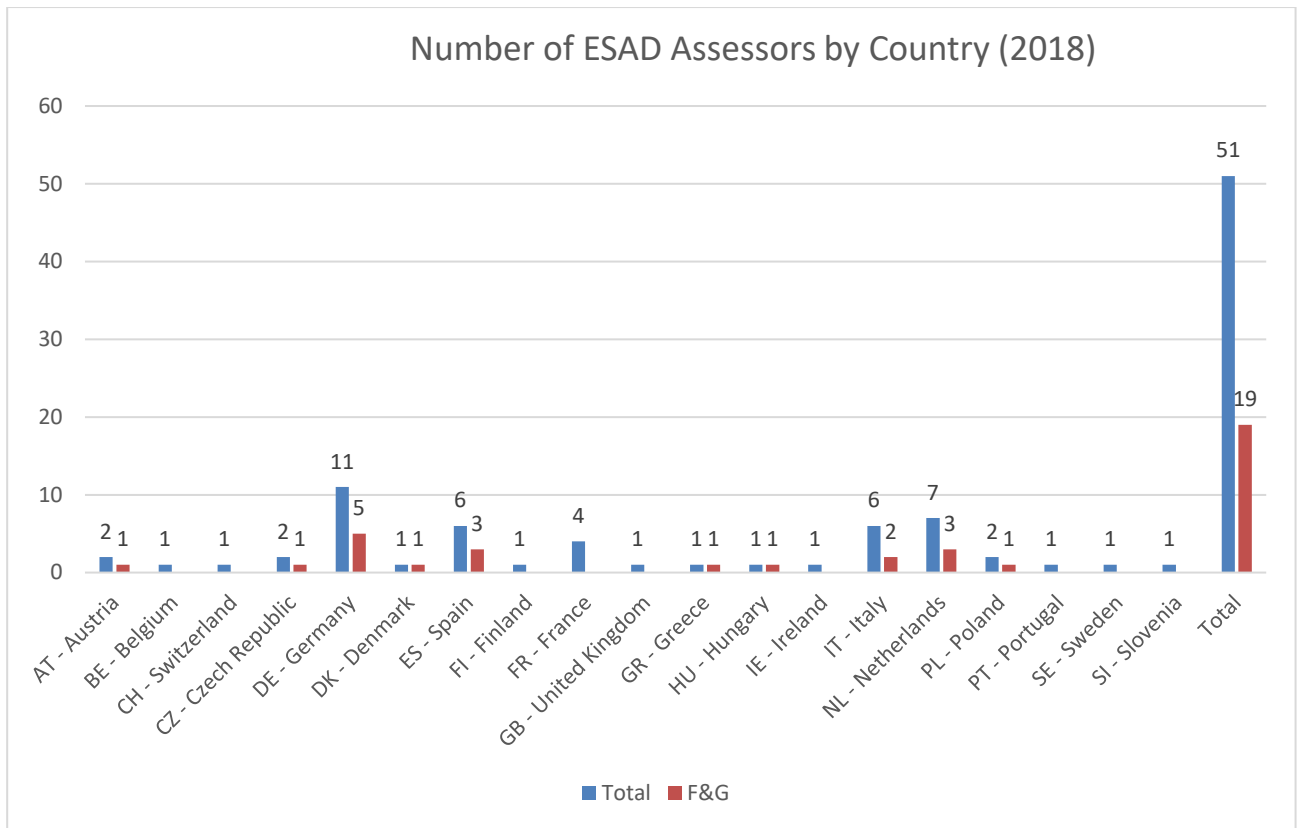


Figure 11: Number of Accredited ESAD Assessors by Country in 2018

Figure 11 displays the wide spread of situations in Europe as far as the number of accredited ESAD assessors per country is concerned: from 11 in Germany to just one in each of Greece, Hungary, Ireland, Portugal, Slovenia, Belgium, Ireland, Sweden, and Denmark.

#### 2.4. Fecc Responsible Care Committee

The *Fecc* Responsible Care Committee consists of Company Responsible Care Coordinators, as well as National Association Representatives. 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 offer support and practical help to companies and NAs which implement Responsible Care across Europe. In 2019, *Fecc* organised three Responsible Care Committee Meetings - thus providing a platform for Responsible Care Coordinators and Responsible Care National Association Representatives to interact and share best practices. During the Responsible Care Committee Meetings in 2019 the following, presentations were made:

- *VCH* (German Chemical Distribution Association): “State of Play Responsible Care in Germany”.
- *Scienceindustries* (Swiss Chemical Distribution Association): “Latest Developments in the field of Responsible Care in Switzerland”.
- *Omya*: “*Omya* Corporate – Facts & Figures”.
- *TfS* (*Together for Sustainability*) on SQAS/ESAD recognition + cooperation.
- *Cefic* (Chief Economist): “The Global Chemical Industry: Latest Changes and Challenges”.
- *Cefic* on progress of the Responsible Care rejuvenation project.
- *Eurochlor* (in cooperation with *Fecc*) on critical misloads with potential chlorine gas development.

The Committee Meeting on 04 September 2019 was hosted by *Omya* at *Omya*'s site in Cologne, Germany, including a brief guided tour.

Since 2017 the renewed cooperation with *Cefic* is based on an updated version of the Responsible Care Partnership Agreement (Memorandum of Understanding) which was signed by the DGs of the two associations. This agreement aims at endorsing the ongoing close cooperation between both parties in the promotion and implementation of Responsible Care initiatives all over Europe. In this context, *Fecc* suggested that its Member National Associations refresh and re-evaluate their national Responsible Care Partnership Agreement with their respective national Manufacturers Association.

*CBA/Fecc* continued to play an active role in *Cefic*'s Responsible Care Rejuvenation Issue Team which was formed end of 2017 to strengthen the initiative in Europe. Work on the project was intense throughout 2019. Three different Workstreams addressed specific issues in a targeted approach. *Fecc* participated especially in Workstream II which clarified the role and responsibilities of associations. *CBA/Fecc* also actively engages in other core elements of the rejuvenation project such as alignment to ISO standards, fostering and improving Key Performance Indicator reporting, strengthening verification processes, and supporting SMEs on the path to compliance with ISO standards. *Cefic* agreed on four levels of Responsible Care compliance (maturity levels) including a verification process with assessment based on a high-level ISO structure. Self-assessment will be the basic level. There will be no obligation for companies to move up the compliance ladder. Two chemical distributors participated in the testing phase of the new tools.

A *Fecc* Working Group, led by *CBA*, adjusted the *Cefic* Responsible Care Self-Assessment Excel Tool to chemical distributors. The resulting proposal was approved by the Committee and also accepted by *Cefic*, the latter permanently embedded in the process. The Committee also approved the cooperation with IT service provider *ARCADIS* for the technical adjustments to be made in the first quarter of 2020 after a brief kick-off meeting. The next step will be the development of a Responsible Care Self-Assessment Web Tool which is based on the Excel Tool (Questionnaire) and which will be available in several languages.

The Committee established a Working Group tasked to update the [Fecc Note on Sustainability](#) (first published in March 2017) taking into account new elements, such as the EU Commission's Green Deal Initiative, links between the UN SDGs and chemical distribution, new references to the revised SQAS/ESAD Questionnaire, etc.

Another Working Group, led by *Brenntag/Fecc* was established in view of organizing a joint Workshop *Eurochlor-Fecc-Brenntag* and other potential stakeholders such as *ECTA* and Swimming Pool Associations - aiming at the development of awareness-raising/training tools, including guidance material at European level.

Finally, *Fecc* participated actively in the "Responsible Chemical Distribution & Trade Conferences" organized by *CRDFGlobal* in Brussels in March and October 2019 as well as *EU-OSHA Healthy Workplaces Summit* (Campaign 2018-2019: Manage Dangerous Substances) in Bilbao in November 2019.

## ANNEX I

### Level of Responsible Care Participation in Europe (*Fecc* Membership: National Associations) per Country

Tables: Level of Responsible Care Participation in Europe per Country (Data *Fecc* Surveys 2010- 2019) – Participation in Responsible Care

	# distributors	# committed	%	# distributors	# committed	%
	2009	2009	2009	2010	2010	2010
Belgium	27	16	59	29	29	100
Czech Republic	18	8	44	15	9	60
Germany	108	67	62	109	67	61
Denmark	31	6	19	29	5	17
Spain	58	24	42	59	20	34
France	76	45	59	69	42	61
Finland	17	16	94	16	16	100
Italy	231	43	19	79	44	56
Ireland	12	12	100	12	12	100
The Netherlands	53	53	100	53	53	100
Portugal	33	11	33	31	11	36
Sweden	25	18	72	47	21	45
UK	95	95	100	92	92	100
<b>Average %</b>			<b>62</b>			<b>67</b>

	# distributors	# committed	%	# distributors	# committed	%
	2011	2011	2011	2012	2012	2012
Belgium	29	29	100	30	30	100
Czech Republic	15	9	60	15	9	60
Germany	107	67	63	106	68	65
Denmark	31	5	16	31	5	16
Spain	54	20	37	52	14	27
France	70	42	60	64	42	66
Finland	17	15	88	16	15	94
Italy	79	45	57	74	42	57
Ireland	9	9	100	9	9	100
The Netherlands	38	38	100	31	31	100
Portugal	44	11	25	43	10	23
Sweden	45	18	40	28	18	64
UK	93	93	100	92	92	100
<b>Average %</b>			<b>65</b>			<b>67</b>

	# distributors	# committed	%	# distributors	# committed	%
	2013	2013	2013	2014	2014	2014
Belgium	28	28	100	28	28	100
Czech Republic	14	9	64	13	11	85
Germany	106	65	61	102	65	70
Denmark	38	9	24	38	9	24
Spain	50	22	44	51	20	40
France	63	40	63	66	41	62
Finland	15	15	100	18	18	100
Italy	72	41	57	72	41	57
Ireland	9	9	100	10	8	80
The Netherlands	39	39	100	34	34	100
Portugal	42	11	26	41	12	29
Sweden	40	17	43	40	17	43
UK	89	89	100	93	93	100
<b>Average %</b>			<b>68</b>			<b>68</b>

	# distributors	# committed	%	# distributors	# committed	%
	2015	2015	2015	2016	2016	2016
Belgium	24	24	100	24	24	100
Czech Republic	12	12	100	13	13	100
Germany	101	72	71	101	71	70
Denmark	31	9	29	29	9	31
Spain	52	25	48	58	26	45
France	68	41	60	67	44	66
Finland	16	16	100	20	20	100
Italy	72	42	58	72	42	58
Ireland	10	10	100	10	10	100
The Netherlands	27	27	100	31	31	100
Portugal	41	12	29	38	12	32
Sweden	35	15	43	43	13	30
UK	90	90	100	91	91	100
<b>Average %</b>			<b>72</b>			<b>72</b>



	# distributors	# committed	%	# distributors	# committed	%
	2017	2017	2017	2018	2018	2018
Belgium	23	23	100	21	21	100
Czech Republic	13	13	100	13	13	100
Germany	107	75	70	104	74	71
Denmark	29	9	31	28	9	32
Spain	58	26	45	58	26	45
France	65	43	66	65	43	66
Finland	15	15	100	15	15	100
Italy	72	40	56	70	40	56
Ireland	10	10	100	11	11	100
The Netherlands	31	31	100	31	31	100
Portugal	38	12	32	38	12	32
Sweden	34	14	41	34	14	41
UK	90	90	100	89	89	100
<b>Average %</b>			<b>72</b>			<b>73</b>

## ANNEX II

### Data Eight Guiding Principles 2013-2018

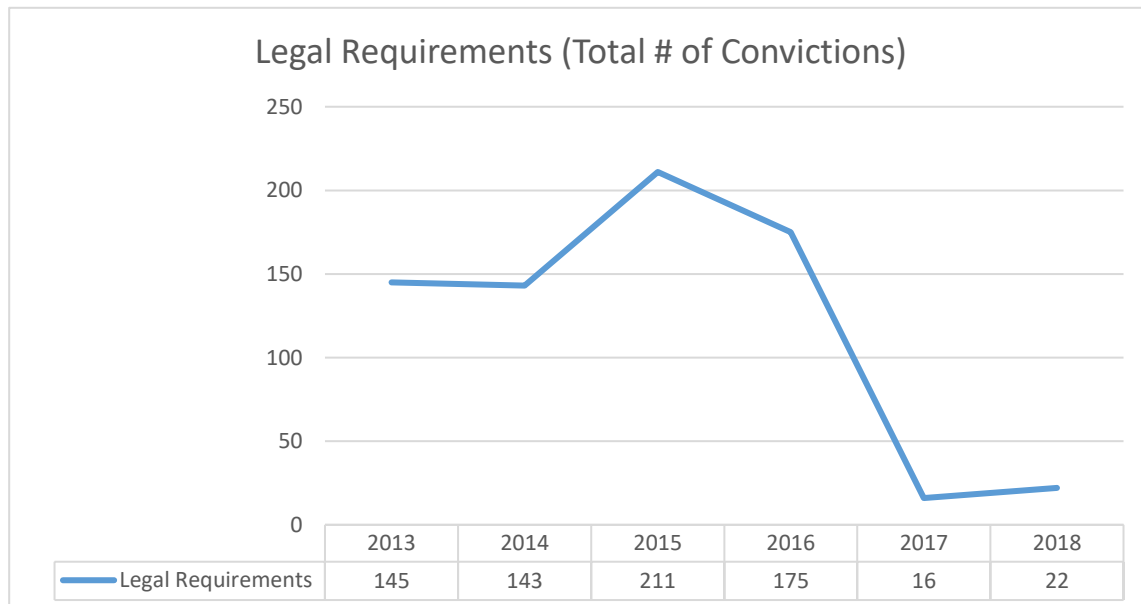
#### Explanatory note:

The data below refer to questions in the *Fecc* Annual survey for NAs.

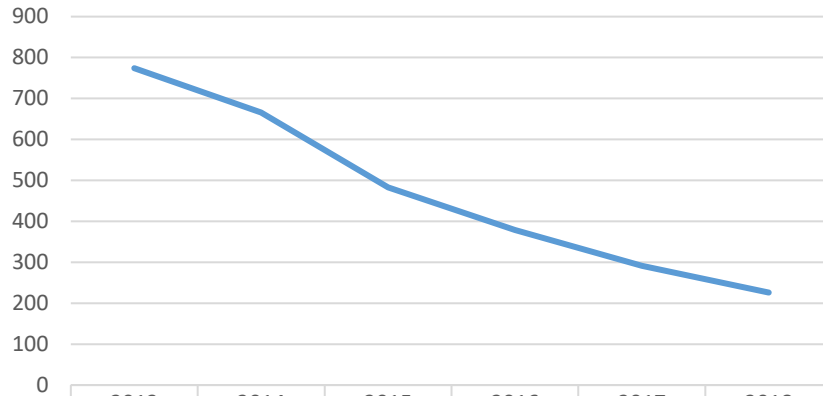
No data are available for Spain, Portugal, Italy, and France in 2018 (Survey 2019).

#### Definitions:

- Policies & Documentation: Number of Distributor Members having at least one ISO certificate.
- Emergency Response System (ERS): Number of Members having an ERS 24/24 hours and 365 days per year in place.
- Ongoing Improvements: Number of Members having an Improvement Plan (IP) in place.
- Training: Number of Members having Responsible Care as part of the Training Programme for new employees.
- Community Interaction: Number of Members having at least one community interaction last year.
- 

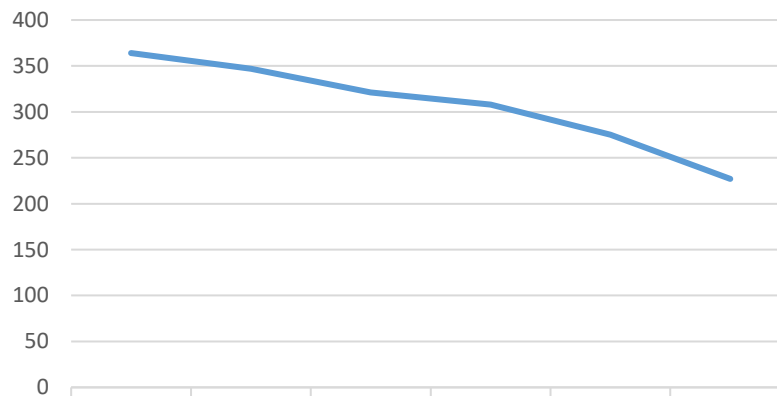


### Management of Risk (Total # of Transport and Non-Transport Incidents)



	2013	2014	2015	2016	2017	2018
Management of Risk	774	666	483	379	291	226

### Policies & Documentation



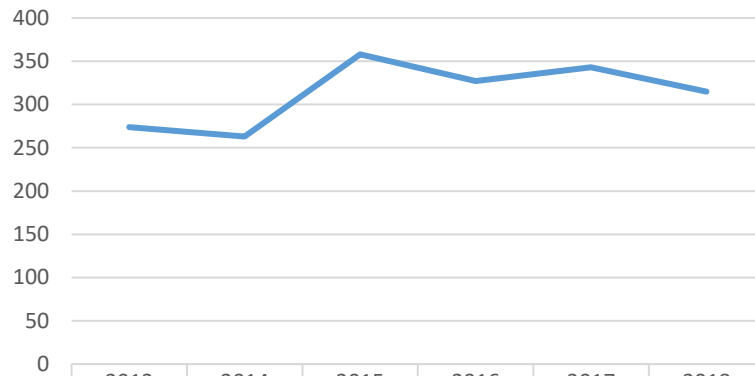
	2013	2014	2015	2016	2017	2018
Policies & Documentation	364	347	321	308	275	227

### TPV Implementation



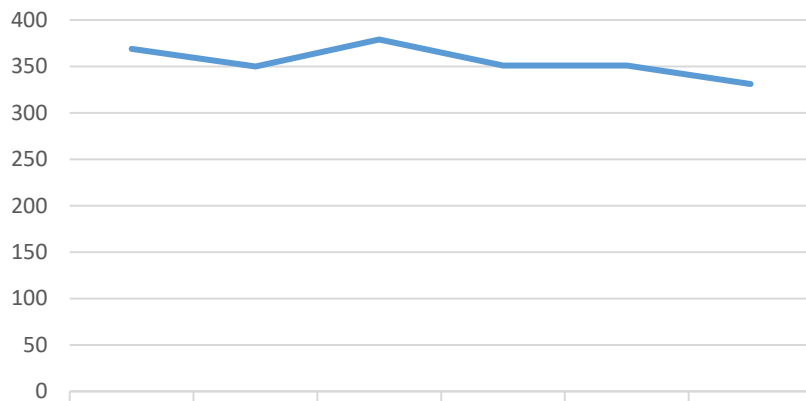
	2013	2014	2015	2016	2017	2018
TPV Implementation	42%	43%	45%	46%	51%	51%

### Emergency Response System (ERS)



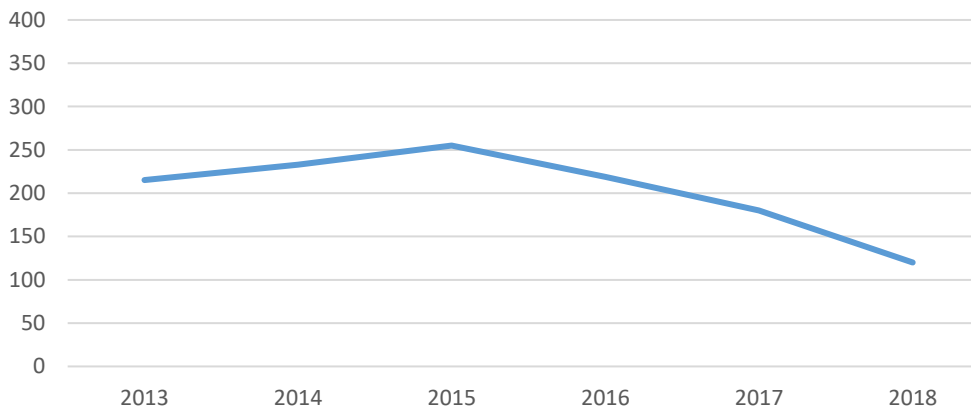
	2013	2014	2015	2016	2017	2018
Emergency Response System (ERS)	274	263	358	327	343	315

### Ongoing Improvements



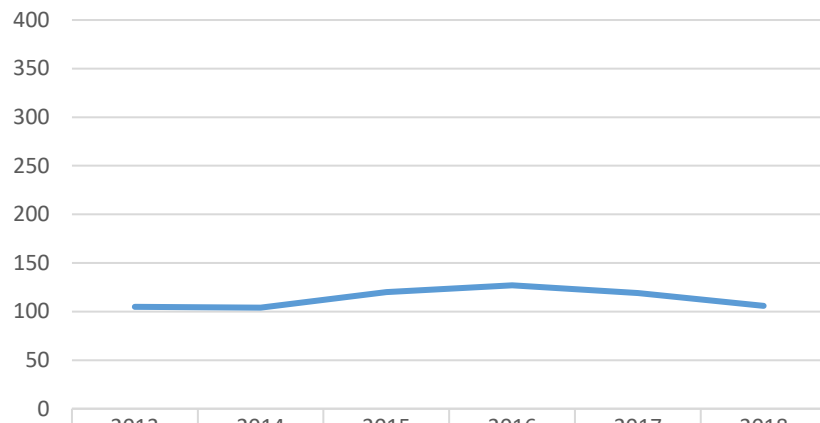
	2013	2014	2015	2016	2017	2018
Ongoing Improvements	369	350	379	351	351	331

### Training



	2013	2014	2015	2016	2017	2018
Training	215	233	255	219	180	120

### Community Interaction



	2013	2014	2015	2016	2017	2018
Community Interaction	105	104	120	127	119	106

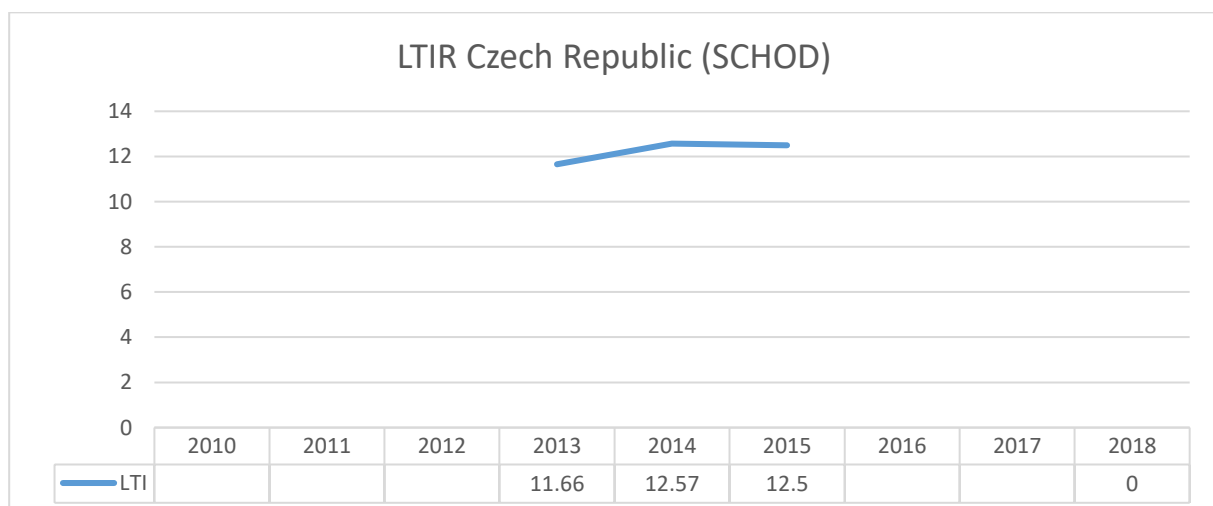
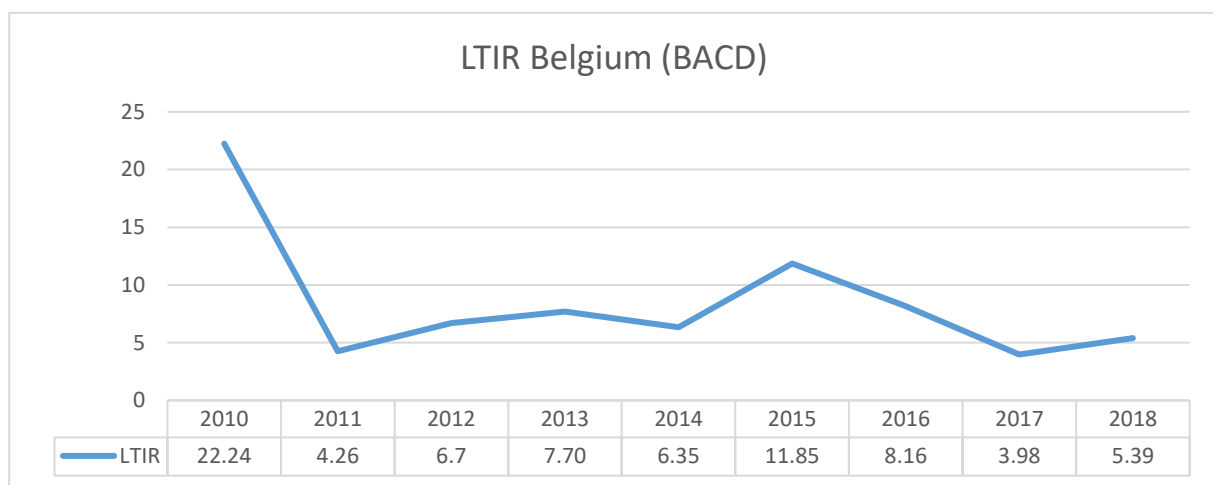
## ANNEX III

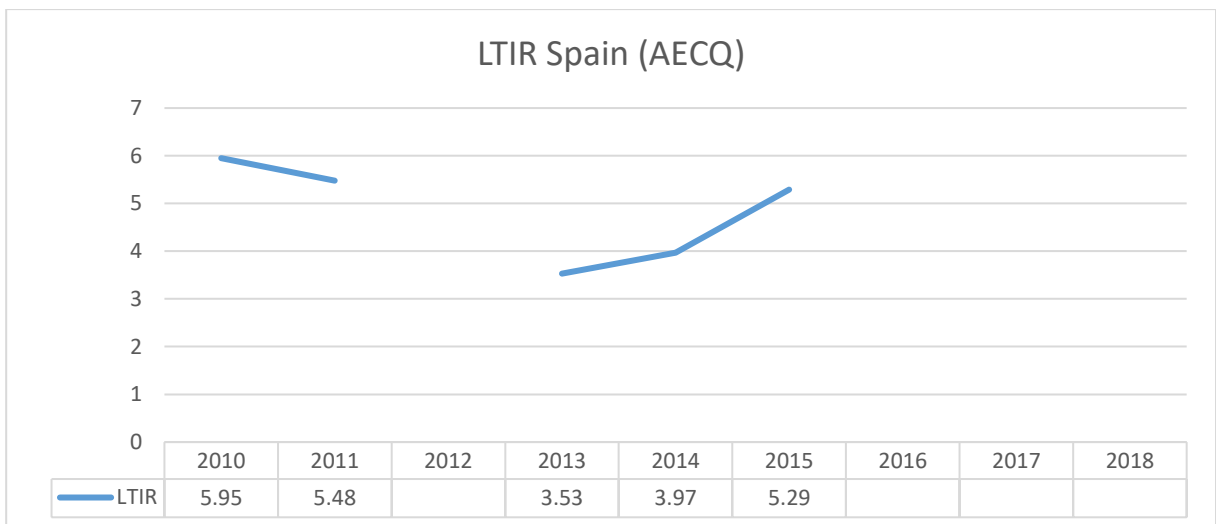
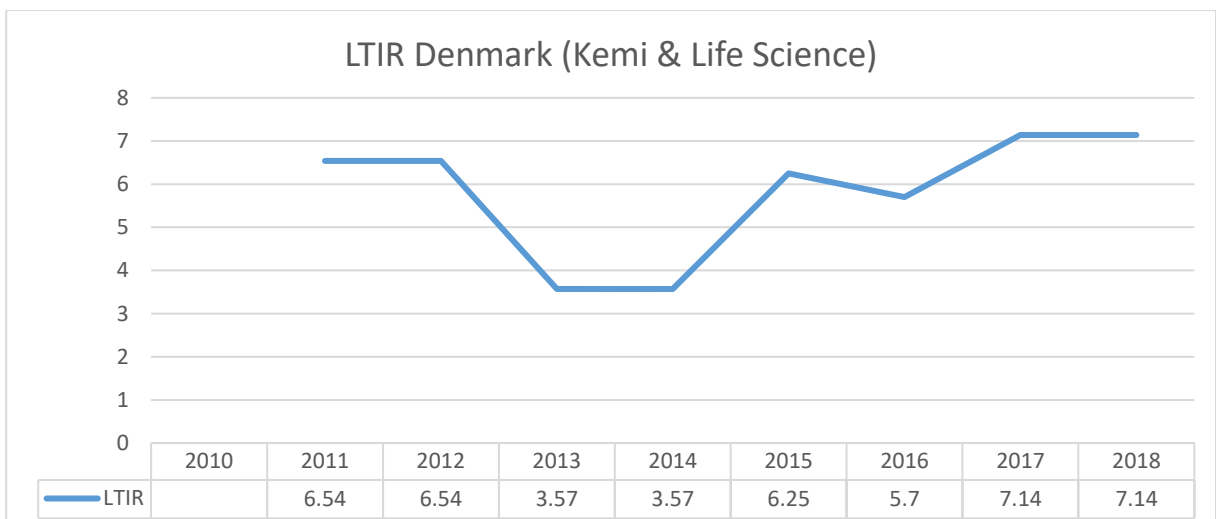
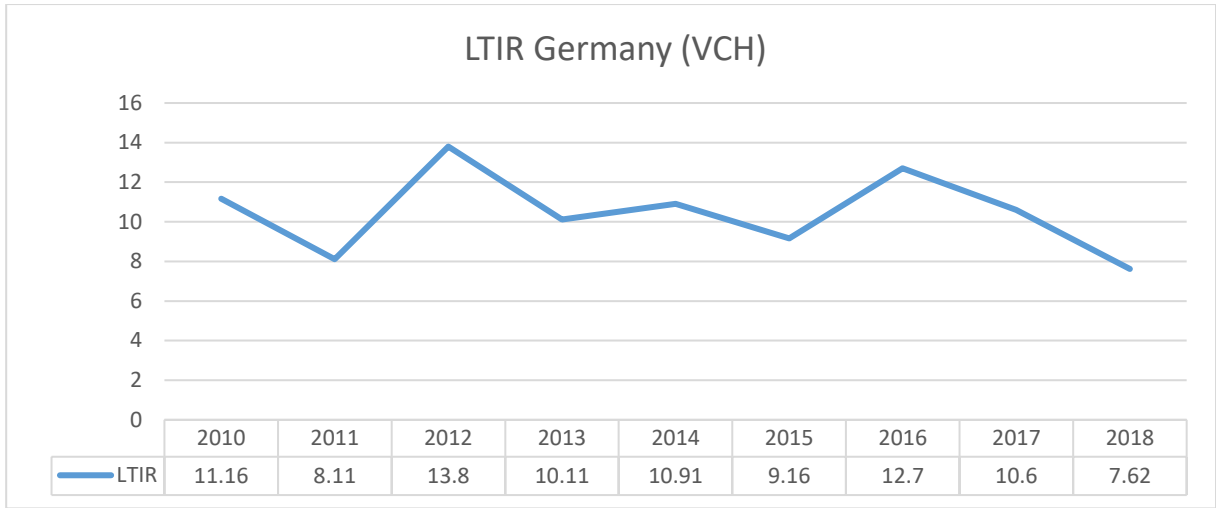
### Data Lost Time Injury Rate (LTIR) by Country 2010-2018

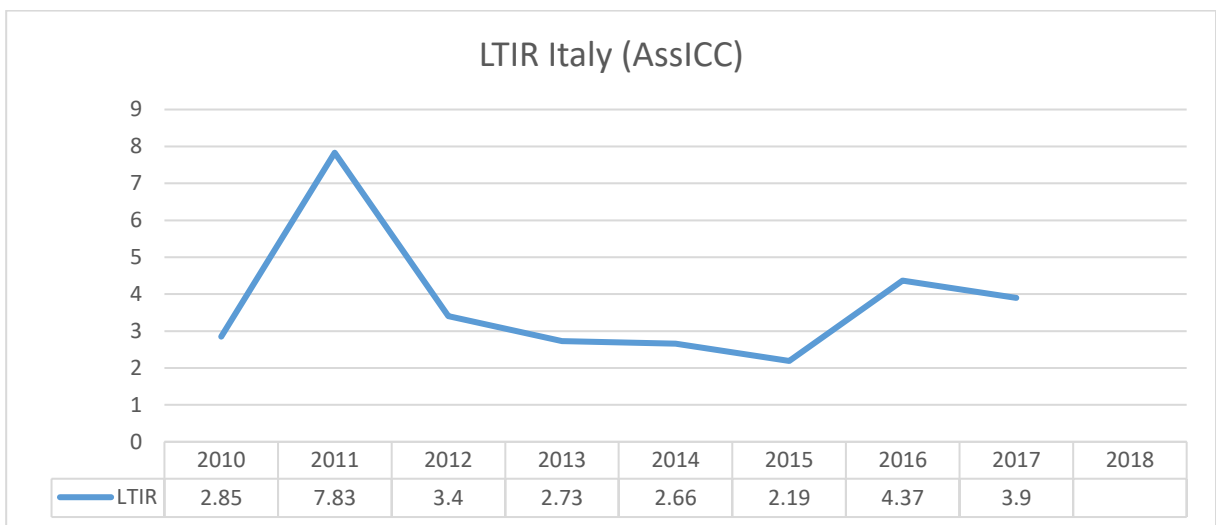
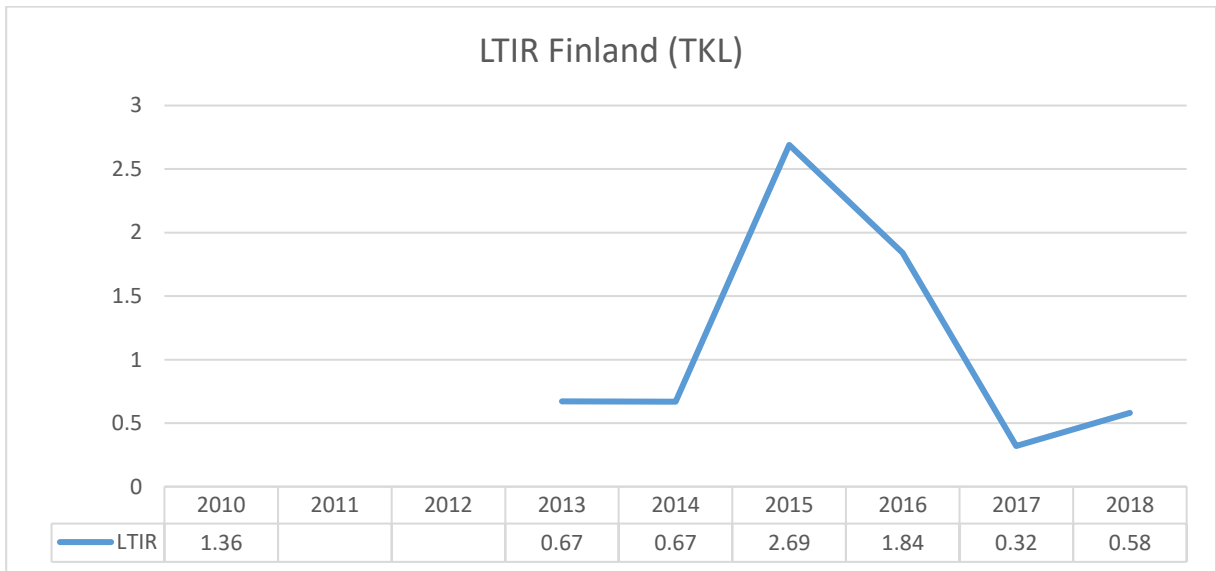
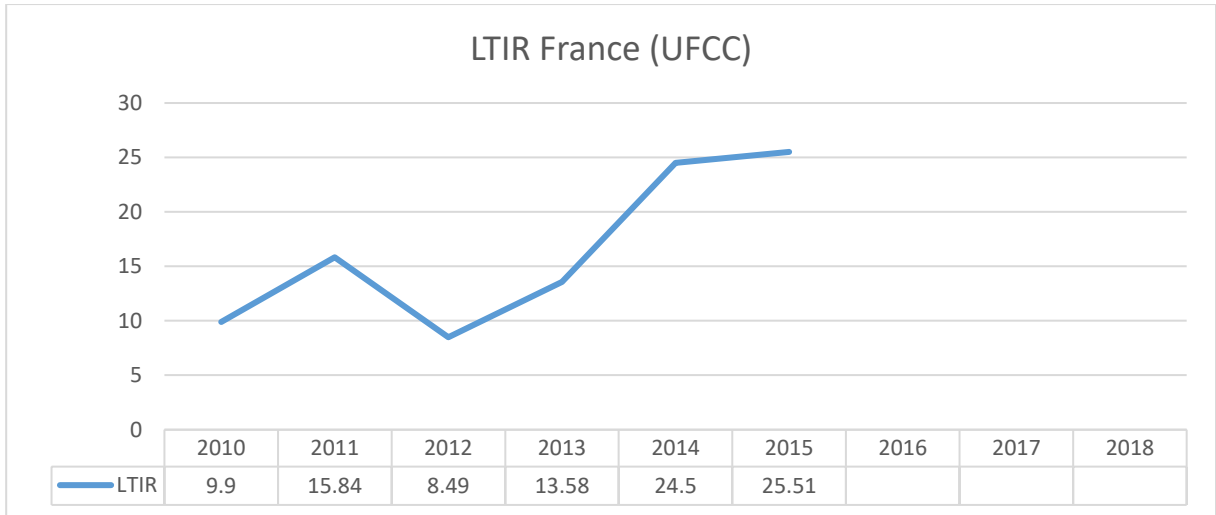
Explanatory note:

Lost Time Injury Rate (LTIR) is defined as the number of accidents leading to a minimum of 3 lost working days per one million worked hours (Total number for all respective NA member companies).

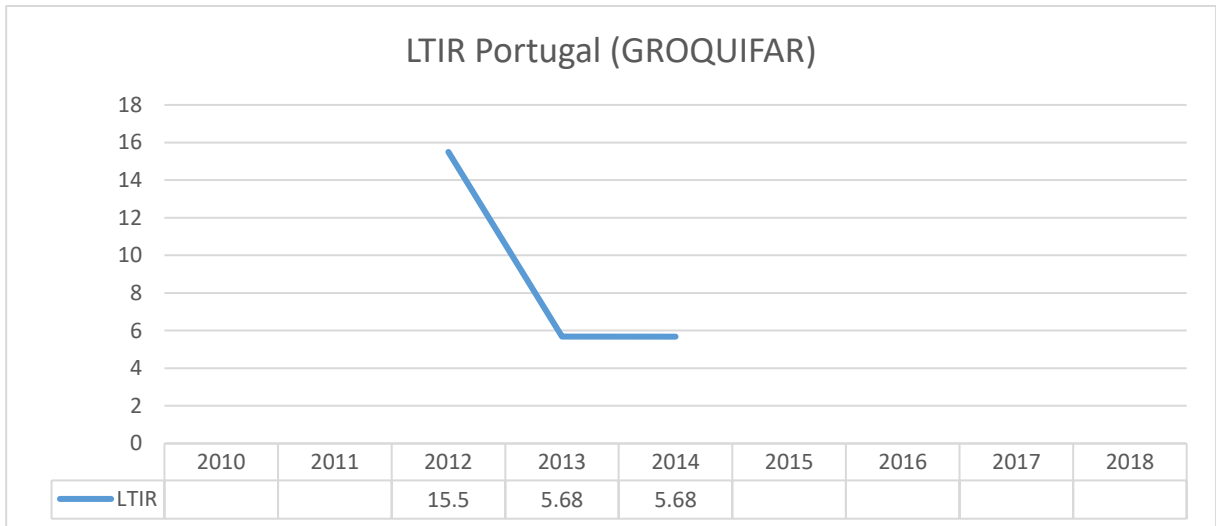
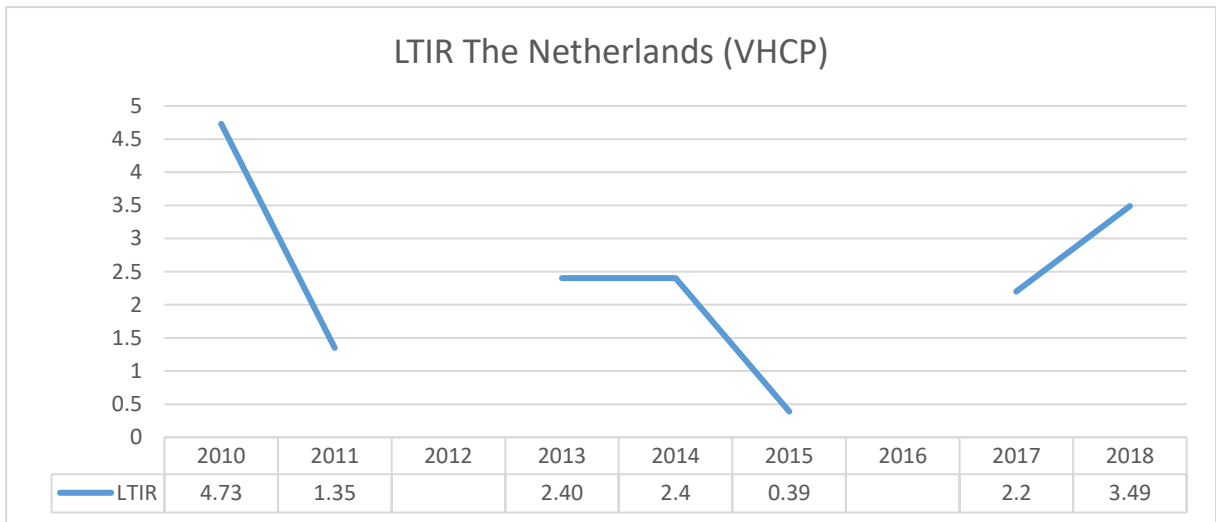
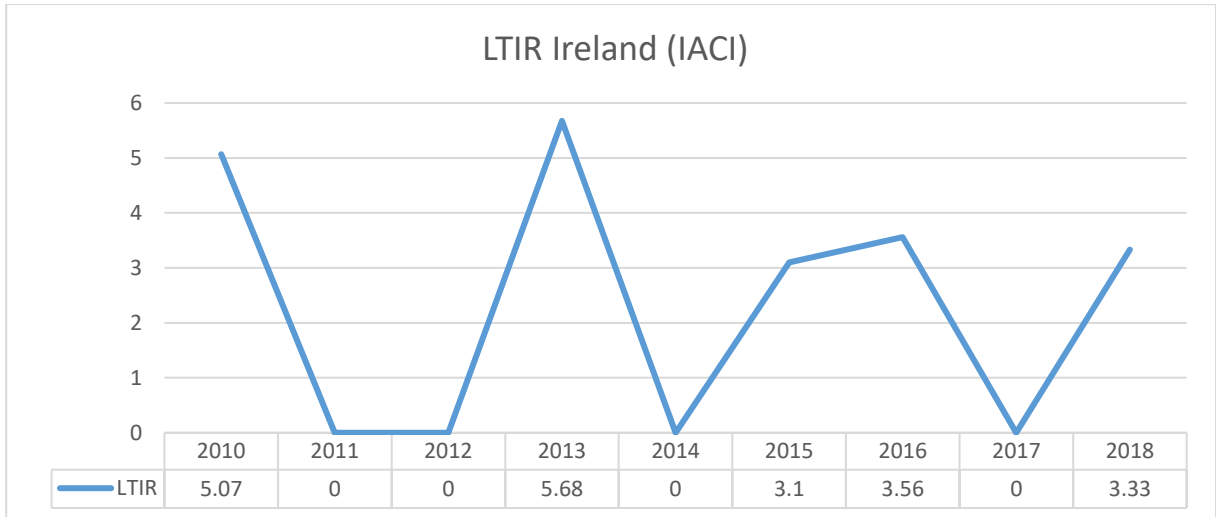
A blank box for certain years means no data (“not indicated”) submitted by the NA in the survey.



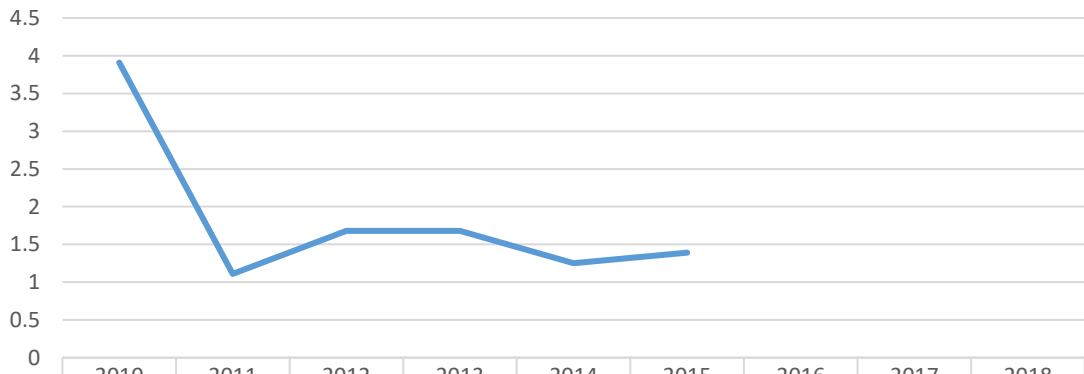






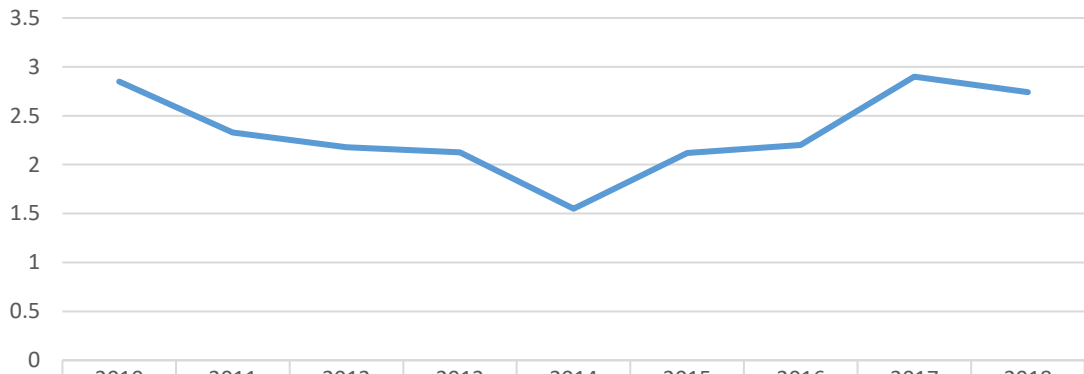


LTIR Sweden (IKEM)



LTIR	3.91	1.11	1.68	1.68	1.25	1.39			1.66
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LTIR United Kingdom (CBA)



LTIR	2.85	2.33	2.18	2.13	1.55	2.12	2.2	2.9	2.74
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