



RESPONSIBLE CARE[®]

PRODUCT STEWARDSHIP

CODE OF MANAGEMENT PRACTICES

Developed by
Chemical Industries Council of Malaysia (CICM)
(Company No: 82699T)
c/o Federation of Malaysian Manufacturers
Wisma FMM, No. 3, Persiaran Dagang, PJU 9
Bandar Sri Damansara, 52200 Kuala Lumpur

PRODUCT STEWARDSHIP CODE

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PRODUCT STEWARDSHIP CODE OF MANAGEMENT PRACTICES

INTRODUCTION

This is the last of the 6 Codes of Management Practices and ties-up all the other codes together and also fills the gaps still remaining, primarily in the downstream use, research and development.

This Code focuses on the health, safety, and environment implications of a product . from inception through final disposal. This includes designing lower-risk products, educating customers about proper use and gathering feedback about the way customers actually use products and revising health, safety and environment recommendations accordingly.

The first step of product stewardship characterises the risk of a product based on its inherent hazard and potential uses and exposures. Companies will ask, ~~W/hoc~~ going to handle it, how will it be packaged, how will it be used, who will use it, so that they can project and anticipate risk+. Subsequently, the company will have to design their products to minimise these risks, and for risks that remain with the product, the company must develop a management process for such products. The key step is to keep a flow of information coming back to the company about how customers are actually using the product. In actual fact, companies have a duty to ensure proper usage and handling of their products by their customers. Customer and product awareness will lead to preventive and mitigative measures to minimise waste.

SCOPE

The scope of this Code is very wide and ranges from the management of the product from its development in the research laboratory to its manufacture, distribution , usage and ultimate disposal. Its focus is on the health, safety and environmental effects of the product as opposed to the process from its inception to final disposal. Successful implementation requires everyone involved with the product to responsibly address the community's interest in a healthy environment and safe use of the chemical product. The Code provides guidance as well as a means to measure continuous improvement in the practice of product stewardship.

OBJECTIVES

The objective of the Product Stewardship Code is to make health, safety and environmental protection an integral part at all stages of a chemical product from initial research and development, to manufacture and distribution and ultimate disposal. The Code requires everyone involved in handling and use of chemical products to do so responsibly and to help maintain a safe and healthy environment.

COMPLIANCE WITH RESPONSIBLE CARE GUIDING PRINCIPLES

The Product Stewardship Code complies with the following Guiding Principles :

- (1) To develop and produce chemicals that can be manufactured, transferred, used, and disposed of, safely.
- (2) To make health, safety and environmental considerations a priority in planning for existing and new products and processes.
- (3) To report information on chemical-related health or environmental hazards, and recommend protection measures, to employees, customers, authorities and the community.
- (4) To counsel customers on safe use, transportation and disposal of chemical products.
- (5) To extend knowledge by conducting or supporting research on the health, safety and environmental effects of products, processes and waste.

MANAGEMENT PRACTICES AND IMPLEMENTATION GUIDELINES

The 12 management practices in this Product Stewardship Code that focus on the health, safety and environmental effects of a chemical are :

Management Practices

1. Demonstrate senior management leadership through written policy, active participation and communication.
2. Establish goals and responsibilities for implementing product stewardship throughout the organisation. Measure performance against these goals.
3. Commit resources necessary to implement and maintain product stewardship practices.
4. Establish and maintain information on health, safety and environmental hazards and reasonable foreseeable exposure from new and existing products.
5. Characterise new and existing products with respect to their risk, using information about health, safety and environmental hazards and reasonably foreseeable exposures. Establish a system that initiates re-evaluation.
6. Establish a system to identify, document and implement health, safety and environmental risk-management actions appropriate to the product risk.
7. Establish and maintain a system that identifies health, safety and environmental impacts . including the use of energy and natural resources . key considerations in designing, development and improving products and processes.

Implementation Guidelines

- Senior management commitment through written policy that identifies vision and goals for product stewardship implementation. Actively participate and organise regular meetings to achieve such goals.
- Incorporate product stewardship goals into employee job description. Conduct regular performance reviews against these goals.
- Identify personnel, allocate adequate financial support, and other necessary resources to implement and maintain product stewardship practices.
- Develop, maintain and distribute Chemical Safety Data Sheet for all products with regular updates of regulatory changes, foreseeable exposure and new risks.
- Establish a process that initiates re-evaluation of risk characterisation for new and existing products using health, safety & environmental hazard information.
- Develop a product-risk matrix and implement safety, health and environmental management action plan appropriate to the product.
- Integrate safety, health and environmental impacts including optimum use of energy and natural resources in the design and development of products and processes.

Management Practices

8. Educate and train employees (based on job function) on the proper handling, recycling, use and disposal of products and known product uses. Implement a system that encourages employees to feedback information on new uses, identified misuses or adverse effects for use in product risk characterisation.

9. Select contract manufacturers who employ appropriate practices for health, safety and environmental protection for the operations under contract, or work with contract manufacturers to help them implement such practices. Provide information and guidance appropriate to the product handling, use, recycling and disposal. Periodically review performance of contract manufacturers.

10. Select suppliers that provide appropriate health, safety and environmental information and guidance on their products. Factors adherence to sound health, safety and environmental principles, into procurement decisions.

11. Provide health, safety and environmental information to distributors; commensurate with product risk; select, work with and periodically review distributors to foster proper use, handling, recycling, disposal and transmittal of appropriate information to downstream users.

12. Provide health, safety and environmental information to direct product receivers commensurate with product risk; work with them to foster proper use, handling, recycling, disposal and transmittal of appropriate information to downstream users.

Implementation Guidelines

Develop education and training programmes for employees (based on job function) on proper handling, recycling, use and disposal of products. Institute a feedback system on new uses, misuses and adverse effects for inclusion in future product risk characterisation.

Set criteria for selection of contract manufacturers that subscribes to company's health, safety and environmental practices; provide appropriate guidance; conduct periodic review of performance.

Establish procurement policy which requires suppliers to provide guidance and Chemical Safety Data Sheet information on their products.

Supply information on health, safety and environment appropriate to product risk to distributors, who is then responsible to disseminate such information to downstream users on proper use, handling, recycling, distribution and disposal.

Develop and disseminate health, safety and environmental information to direct product receivers according to product risk. Train them in the proper use, handling, recycling, disposal and including conveying such information to their product receivers.

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