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**Responsible Care:
Guidelines for Programme Development**

FOREWORD

This guidebook on Responsible Care should help you to understand and implement responsible care in your industry.

It aims to give you advises on the procedure as per the following:

- *Why should Responsible Care be implemented?*
- *What is Responsible Care?*
- *How should Responsible Care be implemented?*
 - *Guidance for selection*
 - *Within the companies*
- *Conditions for membership*

<p>Why should Responsible Care be implemented? What are the benefits of Responsible Care?</p>
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Through Responsible Care, the member companies are committed to support a continuing effort to improve responsible management of chemicals within Industry.

The mission of the Responsible Care is to make life better for people around the world. In this context, our Industry should assure continuous progress towards the vision of no accidents, injuries or harm to the environment and should publicly report to global health, safety and environmental performance. Therefore, it should lead the companies in ethical ways that increasingly benefit to society, economy and environment while adhering to the following principles:

- To seek and incorporate public input regarding the products and operations
- To provide chemicals that can be manufactured, transported, used and handled with safety measures
- To make health, safety, environment and resource conservation critical considerations for all new and existing products and processes
- To provide information on health or environmental risks and pursue protective measures for employees, the public and other key stakeholders

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- To work with customers, carriers, suppliers, distributors and contractors to foster the safe use, transport and disposal of chemicals
- To operate the facilities in a manner that protects the environment and the health and safety of all employees and the public
- To support education and research on the health, safety and environmental effects of all products and processes
- To work with others to resolve problems associated with past handling and disposal practices
- To lead in the development of responsible laws, regulations and standards that safeguard the community, workplace and environment
- To practice Responsible Care® by encouraging and assisting others to adhere to these principles and practices.

RESPONSIBLE CARE

1. Introduction

Chemical products are vital enablers of the essentials of life: clean water, a safe and secure supply of food, energy-efficient transportation, decent housing and important pharmaceutical and health care solutions. The scientists in chemical labs work diligently to unlock nature's secrets, harnessing the power of chemistry to improve the standard of living the world over.

The Chemical Industry is responsible for ensuring that they succeed, for enabling them to deliver on the promise of chemistry.

While delivering on this promise, the Chemical Industry is equally responsible for ensuring that human health and safety, and the Earth's delicately balanced ecosystems, are not compromised. The power of chemistry must be responsibly managed.

This is far from a new motion. The Chemical Industry has been a leader in stepping up to its responsibilities. It has gone further, faster, than virtually any other industry in embracing the obligations of protecting human health and the environment.

Responsible Care has set the pace.

Despite this, the Chemical Industry is still a long way from completing the journey. Public scepticism and unfamiliarity, strident environmental detractors and the past mistakes of the industry, all continue to chip away at reputation and credibility - potentially damaging the Chemical Industry freedom to operate and its continued ability to contribute to improving the quality of life around the world. To avert this course, it must act purposefully and strategically to win the trust, understanding and support of the global public.

How to get the benefits of chemicals, while minimising risk and improving the Industry reputation?

Responsible Care is still the answer.

2. What is Responsible Care?

Responsible Care is a voluntary initiative developed and adopted by chemical industry associations to improve the health, safety and environmental performance of their member company operations and products and the level of community involvement and awareness of industry.

Responsible Care is defined as:

"The commitment by chemical companies to demonstrate continuous improvement of Environmental, Health and Safety performance of their operations and products in a manner which is responsive to the concerns of the public".

This definition encompasses some of the essential features Responsible Care which are:

- A voluntary commitment to an ethical behaviour
- A continuous improvement of the health, Safety and Environment performances of the Chemical Industry processes and products
- A willingness to communicate both inside and outside the industry with all stakeholders.

The commitment to an ethical behaviour is materialised by companies' CEOs signing national guiding principles.

This behaviour is characterised by:

- being proactive rather than defensive
we recognise the public right to know
- being open rather than secret
we listen as much as we talk
- mutual assistance and experience sharing;
rather than every company competing for itself
- caring for the whole lifecycle of our products;
rather than "I am no more responsible for the sold product which crossed the plant fence".

Health, Safety and Environment continuous performance improvement happens through the identification and sharing of best practices which are gathered in codes of management practices or guidance documents.

Communication happens at all levels:

- Plant level with local advisory panels to explain to the local community what products is the plant manufacturing, how useful they are, what are the risks and how they are monitored, what are the plant benefits and impacts on community life.
- National level through national associations with regulators, consumer and green associations
- At international level through corporate communication, CEFIC with the European Community, ICCA with UN organisations such as UNEP, green international organisations, Trade-unions associations.

These Responsible Care practices have been encapsulated in the "ICCA Eight Fundamental features":

1. Commitment to guiding principles
2. Public input and communication
3. Codes of Best Practices
4. Performance reporting
5. Mutual assistance and experience sharing
6. Mutual encouragement

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7. Logo protection
8. Verification

These are the features which must be present in a country chemical association Responsible Care initiative, in order for it to be granted the "Responsible Care" status by ICCA.

Responsible Care is called an initiative rather than a programme because its commitment to continuous improvement makes it never ending.

Fundamental features 1 (Commitment to guiding principles) and 6 (mutual encouragement for all companies to join the initiative) relate to the Commitment to an ethical behaviour.

Fundamental features 3 (Identifying best practices) and 5 (Mutual assistance and experience sharing) allow the continuous improvement of the performances of the industry process and products.

Fundamental features 2 (Public input and communication) and 7 (Responsible Care Trade-mark and logo protection) relate to communication while performance reporting (feature 4) and verification (feature 8) allow both to communicate, demonstrate performance improvement, identify gaps and add to the credibility of the initiative.

3. The benefits of Responsible Care?

The benefits derive from:

- Performance improvement

Although accidents which were avoided never appear in a costs report, less accidents, less waste, better products yield cost benefits.

- Performance improvement and a better communication improve the perception of the industry

A better perception by regulators helps in better and more workable regulation.

- A better perception by the public helps maintain the Industry license to operate:

A poor public perception is creating obvious difficulties:

- Communities' nervousness and reluctance to allow new plants or expansions
- Difficulty in getting approval to put new products on the market
- Growing "end of pipe" regulations, often costly, and inefficient
- Higher insurance and financing costs
- Difficulty in hiring the people the industry needs

When dealing with Health, Safety, Environment, Communication and Product Stewardship, Responsible Care provides a framework for all organisation and management practices including regulation. This framework allows for the implementation of process oriented management systems, which is much more efficient than dealing with all regulations, once at a time.

4. Responsible Care and regulation

In the past, this industry adopted the attitude just to "meet the regulation".

It is only by the end of the eighties that it became obvious that this approach had serious drawbacks.

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The regulators were imposing more detailed regulations to cope with more complex issues, leading to a growing bureaucracy and difficulties with achieving the required performance through this regulatory process.

For industry, it also became obvious that regulations were becoming outdated because of technical progress, were difficult to change, and in some cases they were just impractical.

There was a growing realisation that industry also had to feel responsible for its Health Safety and Environmental performance through an initiative generating motivation, enthusiasm and ownership among its employees and allowing, taking into account the whole lifecycle of products rather than end of pipe specifications: Responsible Care.

Regulation is still needed to guarantee a minimum level of performance by all, including those who do not volunteer. Responsible Care allows a superior level of performance and its practices can be used instead of or as pilot before developing new regulation. This was recognised in an ILO 1999 Tripartite sectoral meeting on "Training and Education on Safety, Health and Environment in the Chemical Industries", which concluded:

- In promoting improved HSE performance, the regulatory framework and voluntary initiatives (VIs) should be mutually supportive. The regulatory framework should aim at ensuring that minimum standards are set and met. Legislative requirements should be enforced through a system of legally authorised inspections, and compliance should be encouraged through support programmes and through sanctions. Where goal-setting regulations, combined with flexibility regarding the means used for compliance, are preferred to a "command-and-control" or prescriptive approach, they also require suitable government oversight.
- Voluntary initiatives should in particular aim at achieving higher levels of performance than those possible through legislation alone. Their goals should not be static but should be based on the principle of continuous improvement. Appropriate HSE management systems which assure conformance with requirements, both of legislation and of voluntary initiatives, should be in place. Voluntary initiatives should provide encouragement and mechanisms for bringing all plants and firms up to acceptable performance levels. Governments should promote and encourage the use of voluntary initiatives such Responsible Care as a complement to legislation, where appropriate, to achieve improved performance.

RESPONSIBLE CARE: THE ACTORS

Actors who make Responsible Care happen are:

- Chemical Companies

Chemical companies manufacture, sell, and distribute chemical products. All the field action is at company level: Responsible Care implementation builds on companies' programmes. The involvement and support of a company's Chief Executive Officer is critical to the establishment of the overall ethic within an organisation.

- National Chemical Associations

Responsible Care recognises local differences in culture, regulation and so each country has its own Responsible Care programme, driven by its National association or federation.

The national federation role is to promote the Responsible Care initiative so that most chemical companies inside the country join the Responsible Care programme.

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The national federations monitor their members' progress, help in sharing experiences, edit local codes, guidelines, guidance documents and may set minimum requirements.

The national federations own and protect the Responsible Care title and logo which signals that the user has a Responsible Care involvement which meets participation requirements.

- The ICCA (International Council of Chemical Associations)

The ICCA has set up a group: the RCLG - Responsible Care Leadership Group - which oversees Responsible Care development world-wide. It has defined the 8 fundamental features, which must be present in all national programmes in order to be granted the Responsible Care status.

The fundamental features describe the required components of Responsible Care and these are tailored to meet the needs of the country implementing these ethics.

- Last but not least: CEFIC

CEFIC has a co-ordinating role in 21 European Responsible Care programmes and is a partner in the PHARE Chemical Programme.

COMMITMENT TO GUIDING PRINCIPLES

The mission of the Responsible Care is to make life better for people around the world. In this context, our Industry should assure continuous progress towards the vision of no accidents, injuries or harm to the environment and should publicly report to global health, safety and environmental performance. Therefore, it should lead the companies in ethical ways that increasingly benefit to society, economy and environment while adhering to the following principles:

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The national guiding principles must reflect the previously described ethos.

Because of the unique cultural, social, legal and political processes of each country, one size does not fit all. So in each country, the producers association is going to develop its own guiding principles and preferably involves their stakeholders in their design.

The concepts, which must be reflected in the guiding principles, are:

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- Life-cycle stewardship: industry cares about all the HSE effects of its products from cradle to grave
- Dialogue with all stakeholders, acknowledge the public right to know and answer its concerns
- Continuous improvement, regulations as the minimum

At an association level, guiding principles must be approved by the Board of Directors

At company level, they must be signed by the Chief Executive Officer (CEO) or the highest-ranking company officer in the country.

PUBLIC INPUT AND COMMUNICATION

The industry has been secretive for a lot of good - and not so good – reasons and for years conventional wisdom was: “This chemical business is a complicated one and if we tried to describe to the people in the Community all about what we do in these chemical plants, they would not understand it, but worse than that they would be terrified by what they do not understand.”

It took time for the industry to realise that when local communities did not know what was going on, they would imagine the worst.

The first step was to involve communities in emergencies preparedness and then widen their information and involvement.

Industry had to understand that communication is a two way process, not industry convincing communities of what is right and they must believe.

This was achieved through citizen panels at Community level, with national panels at association level which were made up of public interest representatives.

Communications must not be restricted to one stakeholder, but involve all of them, including our own employees and their representatives, authorities and regulators.

CODES OF BEST PRACTICE OR GUIDANCE DOCUMENTS

Codes of Practice, like the guiding principles, reflect the ethic, an attitude, a method of thinking about the way in which member companies do business and their role in society. In particular they address the reality that corporate values must emphasise a long-term commitment to community and occupational health and safety and to environmental protection.

Indeed the codes do not contain static requirements which, once met, never change. Rather they necessitate continuous performance improvement in an environment of changing knowledge and regulation.

They are tools to convert the principles into action, capturing and communicating best practices, again with input from stakeholders.

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Below are some examples of Responsible Care code titles which are self explanatory as to the topics they cover:

1. Emergency Response

2. Dialogue with communities

In several countries, first the United States, this Code is called: "CAER: Community Awareness and Emergency Response"

- Environmental Management
(Pollution prevention and waste minimisation)
- Process safety
Prevention of fire, explosions, accidental releases through "What if" procedures to identify extreme conditions when the plant is in normal operations, start-up, shutdown, or in an emergency including power and utility failure.
(Tmax, Pmax, Cmax, Fmax)
- Health and Safety at work
 - Identification and limitation of exposure
 - Life saving procedures: fire, entry, linebreaking permits ..., electrical tags in and out, change process, work order process, working with contractors.
- Transport and Distribution Safety:
Monitoring and controlling risk during transport, storage, handling of products: SQAS, TREM and ERIC cards, ESAD, National Emergency Response Networks.
- Product Stewardship
It is Responsible Care applied to products and implies:
 - caring about (which does not mean being liable for) the whole lifecycle of the product
 - checking information flows freely and efficiently up and down the supply chain
 - Partnership with downstream users and distributors
 - Designing new products with better fitness for use and lower environmental impacts.

Typically codes of practice call for the management processes widely publicised by Quality Management systems: plan (define organisation, provide resources, set objectives and targets, and schedule to meet them), do (implement), check (monitor, review), act (improve policy, objectives, adapt resources)

The organisation and the extent to which these codes are developed differ from country to country, depending on local conditions and when the association started implementing the initiative.

CEFIC has developed a "comprehensive menu" as a set of requirements to be used to implement Responsible Care. The CEFIC menu has taken into account requirements from codes and best practice around the Responsible Care world and has drawn on existing standards such as ISO 14001 and Environmental Management Systems Standards (EMAS). This menu is enclosed.

PERFORMANCE REPORTING

Each association is expected to regularly report the collective performance of its membership, as well as encouraging its members to report their individual performances to their public.

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It is very gratifying to see that almost all such reports indicate continuous improvement in such things as emissions and waste reduction, employee injuries, plant accidents, transportation incidents and community confidence.

It is however essential that this performance reporting is transparent and credible so that some of our stakeholders do not consider it as "a collection of unverifiable and unverified anecdotes".

These indicators of performance can be used as benchmarks by all participating companies.

Accident levels for instance get driven down through peer and competitive pressure. Release to atmosphere and non-conforming actions are similarly driven down – in a measurable and measured way, and not just in one country but globally.

CEFIC first published guidance on Environmental reporting in 1993. It was then decided to keep it as a document internal to the industry. Continuous improvement is that, when a new edition was ready in 1998 expanded to HSE reporting, it was presented in a press conference and widely publicised. It calls for the publication of 16 core parameters aggregated at European level over a 5 years period:

Year 1 (1998)	• Carbon dioxide and other global warming gases emissions
Year 2 (1999)	• Energy consumption and energy efficiency
Year 3 (2000)	• Number of fatalities
	• Lost time injuries
Year 4 (2001)	• SO _x , NO _x emissions to air
	• P, N compounds emissions to water, Chemical Oxygen Demand
Year 5 (2002)	• VOCs (Volatile Organic Compounds)
	• Heavy metals
	• Distribution incidents
	• Occupational illness frequency rate
	• Hazardous waste for disposal
	• Non-hazardous waste for disposal

For most parameters, CEFIC aggregated data will be 2 years in arrears at the date of publication.

MUTUAL ASSISTANCE AND EXPERIENCE SHARING

Responsible Care promotes experience sharing and communication on HSE topics. It leads competing companies to dialogue and co-operation which brings benefit to all: it transforms the traditional view of HSE management from an individual company activity to a group of like-minded companies representing significant segments of a country's chemical production, under the umbrella of their associations.

This exchange on best HSE practice happens at different levels:

- Through the Responsible Care network, between the 46 participating national associations. This is a key role of the ICCA-RCLG
- Through global companies committed to Responsible Care, which will continue to apply their corporate HSE principles and/or standards in all their operations, taking due account of local regulations and/or practice and respecting local culture. A key role of these global companies is to promote, support the implementation of Responsible Care in developing countries, working closely with local companies. The importance is sharing, not dictating.
- Through national associations who issue codes, guidelines, check lists, organise workshops and seminars
- Through networks of managers as well as coalition of companies within communities or regions.

MUTUAL ENCOURAGEMENT

The initiative will be judged by the performance of the weakest member. It is therefore key that the association have means of encouraging all members to commit to and implement Responsible Care. Since Responsible Care is a top level commitment, networking at the CEO level has proven to be the most effective way of applying pressure and assistance where needed. It is expected that ultimately commitment to Responsible Care will be a condition of national association membership.

LOGO PROTECTION AND LICENSING

Associations must register and protect the logo of Responsible Care and its translated name in their own country to prevent its use by those who fail to carry out all its requirements. They are also encouraged to license its use to partner associations that represent companies along the chemical value chain.

VERIFICATION

Verification is defined as "procedures to verify the implementation of the measurable (or practical) elements of Responsible Care by the member companies."

Stakeholders still have to be convinced that Responsible Care implementation is real and each association has to develop credible means towards that end. This is also means of assuring the peers in the industry that everyone is doing their part. Countries that are well along with verification processes also see them as excellent means of sharing best practices.

The means developed by associations vary from:

- Self-assessment
- Peer review including sometimes people external to the industry, from local communities or other Responsible Care advisory panels for instance. This is the route chosen by ACC in the United States with its Management Systems Verification (MSV).

MSV is a process for evaluating evidence of a company's management system for practising Responsible Care by trained industry verifiers from the national association (ACC) and other non-competing chemical companies and also members from the local community.

- Third party audit

This is a feature of some national programmes and it is practised by some companies.

Many in the industry want to avoid that process to become too bureaucratic with its certified auditors, auditing manuals and accreditation bodies, which would not be consistent with the spirit of a voluntary initiative.

Verification is presently the Responsible Care fundamental feature about which most questions are raised on how to achieve it in a credible way to our stakeholders which implies openness and transparency, and still is acceptable to member companies.

Responsible Care must not just deliver. It must be seen to deliver. Performance reporting and verification procedures are therefore critical for the credibility of the initiative.

VISION FOR THE FUTURE

Responsible Care works for the future of the chemical industry and its contribution to sustainable development.

Many among our stakeholders have some difficulties in believing in the reality and efficiency of a voluntary initiative. They often say: "The problem with voluntary initiatives is that not everybody volunteers".

Nobody believes the industry will behave ethically just for the sake of it. Employers often say: "Remember, we are here to do business".

However, when this industry began to understand how the general public, the regulators and the politicians and the fact that it could cost them their license to operate perceived it, it explored several possibilities.

There were only three:

- Do nothing, which was equivalent to accepting the situation and its consequences for the industry's future
- Argue that the public perception was an exercise in futility: that industry members thought they were doing the right things was irrelevant. For a hostile public, perception was the reality
- Change the cause of the perception: this was the Responsible Care route and the driving force behind it just becomes obvious: it is industry enlightened self interest.

Once the route is chosen, there are not many high level thinking needed or strategic issues unresolved. What remains to be done is implementation, so that improvements are achieved, are seen to be achieved and these improvements answer to our stakeholders concerns.

That means, through Responsible Care:

- Convincing our own colleagues internally that they must behave according to the Responsible Care ethos, involve their employees and that their position papers mentioning "under the umbrella of Responsible Care" should genuinely reflect it
- Widening the use of best practices to more companies, more countries, and down the supply chain
- Communicating better with more stakeholders so that they see that their input and concerns are taken into account.