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**Interoffice
Communication**

TO: Distribution

FROM: T. G. Grumbles

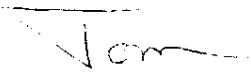
DATE: August 30, 1990

SUBJ: RESPONSIBLE CARE PRODUCT STEWARDSHIP CODE OF MANAGEMENT
PRACTICE DRAFT

VISTA

Attached is the latest draft of the Product Stewardship Code. This is the first draft widely circulated.

I'll be attending the September 11 open meeting. Please provide comments to me before then on the draft.


T. G. Grumbles

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Attachment

Distribution: Dave Penney-Austin, Bill McClain

VVV 000013537



CENTRAL MARINE ASSOCIATES, INC.

August 23, 1990

To Responsible Care Coordinators

Subject: Draft Product Stewardship Code

Dear Responsible Care Coordinator:

Enclosed for your information is the most recent draft of the Product Stewardship Code. The code will be reviewed and discussed at the September 11th Open Meeting which you received notice of earlier. If you have any questions or comments about the draft code, please contact Claudette Cofta, Associate Director, Health Programs, at 202/887-1278.

Please be assured that Open Meetings will be held approximately every three months to review the draft Product Stewardship Code as it is revised and refined.

Sincerely,

A handwritten signature in black ink, reading "Lori Ramonas". The signature is stylized, with a large, sweeping "L" and "R".

Lori M. Ramonas, Ph. D.
Director
Responsible Care

Enclosure

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Product Stewardship Code of Management Practices

PURPOSE AND SCOPE

The goal of the Product Stewardship Code is to have a management philosophy and commitment to design, develop, manufacture and sell products that are safe and environmentally sound when handled, used and disposed of as directed.

Companies also will have the responsibility to develop accurate and sufficient information about the health, safety and environmental effect of their products and to ensure that this information is available and communicated to those who handle, use and dispose of member company products. Finally, companies will have the responsibility to enable those that handle, use and dispose of member company products to do so safely -- with an emphasis on customer education and evaluation.

RELATIONSHIP TO RESPONSIBLE CARE AND GUIDING PRINCIPLES

The code helps achieve several of the Responsible Care Guiding Principles:

- o to make health, safety and environmental considerations a priority in planning for all existing and new products as well as processes;
- o to develop and produce chemicals that can be manufactured, transported, used and disposed of safely;
- o to extend knowledge by conducting or supplying research on the health, safety and environmental effects of member company products, processes and waste materials;
- o to counsel customers on the safe use, transportation and disposal of chemical products;
- o to report promptly to officials, employees, customers, and the public information on chemical-related health or environmental hazards and to recommend protective measures;
- o to promote the principles and practices of Responsible Care by sharing experiences and offering assistance to others who produce, handle, use, transport or dispose of chemicals.

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MANAGEMENT PRACTICES

Member companies shall have an ongoing product stewardship process that includes the following management practices:

1. maintain a commitment through policy, management leadership, communication and resources to ongoing improvements in the product stewardship process -- beginning with senior management and extending throughout the organization;
2. maintain a process for developing and handling products that responds to public needs, while minimizing health and safety risks and adverse environmental impacts;
3. maintain a knowledge base to assess potential adverse effects of products and product uses;
4. identify reasonably foreseeable uses and misuses of products as well as evaluate risk levels during new product development; periodically update the evaluation for existing products;
5. develop and implement actions appropriate to risk levels to minimize risks;
6. select contract manufacturers who meet company health, safety, and environmental standards for the specific product or appropriate operation as well as periodically audit their performance;
7. furnish customers, distributors, and contract manufacturers with information and guidance to enable the proper handling, use, and disposal of products;
8. develop and implement risk management controls -- appropriate to the risk level -- to enable the proper handling, use, and disposal of products;
9. evaluate and do business with customers, distributors, and resellers who meet applicable safety, health, and environmental criteria based on the products sold; provide assistance as appropriate;
10. protect product quality -- including performance as it impacts health, safety, and the environment;
11. educate and, as needed, update sales, marketing, and technical staffs -- emphasizing the reasonably foreseeable uses and misuses of products -- so they, in turn, can counsel customers and distributors in the responsible use and disposal of products; require these staffs to provide feedback to their management;

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12. develop and continuously improve programs that lead to source reductions, recovery, recycling and, where appropriate, disposal of products throughout their lifecycle;
13. educate, train and, as needed, update employees (i.e., R&D, distribution) on the health, safety, and environmental aspects of products.

MEMBER SELF-EVALUATION

RELATIONSHIP TO OTHER CODES OF MANAGEMENT PRACTICES

This code complements, and should be implemented in conjunction with, current and future Codes of Management Practices.