

Interoffice
Communication

TO: Distribution

FROM: T. G. Grumbles

DATE: September 18, 1991

SUBJ: LATEST DRAFT OF RESPONSIBLE CARE EMPLOYEE HEALTH AND SAFETY
CODE

VISTA

Attached is the latest draft of the subject code and information regarding CMA member company employee reviews of the draft code.

The draft code should be out to member companies for official reviews in the near future. This is provided for your information at this time. No action is requested.

It should be noted that an implementation manual will be available for this code. A contractor is currently producing the manual.

Tom G.

T. G. Grumbles

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Attachment

Distribution: SAFETY DIRECTORS

Bruce Trego-Aber, Brent White-Balt, George Williams-Blane, Matt Tonkovich-Hmd, K. L. Fogg-LCCP, R. V. Gantz-LCLAB, Mike Lunsford-LCVCM, Mark Markerson-Okc, Greg Lipps-Premiere, R. B. Martin-Austin, J. R. Drumwright, J. G. Farrier, L. L. Zimmerman

cc: PLANT MANAGERS

R. W. Seymour-Aber, L. R. Bauer-Balt, G. D. Williams-Blane, J. Pavao-Hmd, J. Friend-LCCP, J. W. Ware-LCLAB, P. Carrico-LCVCM, H. D. Garrison-Okc, P. L. Foote-Prem, V. W. Weiss-Austin

T. H. Huffman, R. D. Gamblin, M. S. Reynolds, P. C. Gowan

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CHEMICAL MANUFACTURERS ASSOCIATION

September 9, 1991

TO RESPONSIBLE CARE® COORDINATORS

Subject: Comments from the Employee Review of the Draft
Employee Health and Safety Code of Management Practices

Dear Responsible Care® Coordinator:

Thank you for reviewing the draft Employee Health and Safety (EHS) Code of Management Practices with your employees. The Code Drafting Group appreciates your efforts in conducting this review in such a short time period. The compiled responses from participating member companies and a revised draft of the EHS code (August 23, 1991) are enclosed for your information.

The Code Drafting Group found the comments provided by your employees very valuable. We encourage you to share the compiled comments and the revised EHS code with those employees who participated in the review. Please convey the appreciation of the Code Drafting Group to these employees for their thoughtful review and comments.

Unfortunately, all of the comments could not be reflected in the revised EHS code. Please assure your employees that their many excellent suggestions will be incorporated into the Resource Guide that will assist member companies in implementing the EHS code.

Thank you for your help in this effort. If you have any questions, please contact Sandra L. Tirey, Associate Director, Health Programs at (202) 887-1274.

Sincerely,

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

cc: Health and Safety Contacts
Company representatives submitting comments

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RESPONSIBLE CARE®

EMPLOYEE HEALTH AND SAFETY CODE OF MANAGEMENT PRACTICES

PURPOSE

The goal of the Employee Health and Safety Code of Management Practices is to protect and promote the health and safety of people working at or visiting member company work sites.

To achieve this goal, the code provides management practices designed to continuously improve work site health and safety. These practices provide a multidisciplinary means to identify and assess hazards, prevent unsafe acts and conditions, maintain and improve employee health, and foster communication on health and safety issues.

Implementation of the Employee Health and Safety Code, together with other codes of management practices, can enable member companies to operate in a manner that further protects and promotes the health and safety of employees, contractors, and the public, and protects the environment.

RELATIONSHIP TO GUIDING PRINCIPLES

Implementation of the Code helps achieve several of the Responsible Care Guiding Principles:

- o To recognize and respond to community concerns about chemicals and our operations.
- o To make health, safety, and environmental considerations a priority in our planning for all existing and new products and processes.
- o To operate our plants and facilities in a manner that protects the environment and the health and safety of our employees and the public.
- o To extend knowledge by conducting or supporting research on the health, safety, and environmental effects of our products, processes, and waste materials.

Prevention and Control

11. Mechanisms for reviewing the design and modification of facilities and job tasks, taking into account the following hierarchy of controls: inherent safe design, material substitution, engineering controls, administrative controls, and personal protective equipment.
12. Systems to verify that health and safety equipment is properly selected, maintained and used.
13. Preventive maintenance and housekeeping programs to maintain the safety of facilities, tools and equipment.
14. Timely investigation of work site illnesses, injuries and incidents; corrective actions to prevent recurrence; and evaluation of the effectiveness of corrective actions taken.
15. Security procedures and systems to control entry of personnel and materials into the work site and restricted areas.
16. Provisions for emergency medical assistance for people at work sites.

Training and Communications

17. Communication of health and safety information that is relevant to specific job tasks and the work site.
18. Health and safety training programs, including documentation of these programs, and methods to evaluate the effectiveness of both training and communications activities.

INDUSTRY TREND DATA

To identify industry trends, each company shall report to CMA, or its designated agent, occupational injury and illness rates, as specified in CMA's Occupational Injury and Illness Reporting Program.

RELATIONSHIP TO OTHER CODES OF MANAGEMENT PRACTICES

This code complements, and should be implemented in conjunction with, current and future codes of management practices, especially those elements of the CAER Code involving emergency response, the Process Safety Code involving training of employees in their job functions, and the Product Stewardship code involving health, safety and environmental information and employee education and product use feedback.

CHEMICAL MANUFACTURERS ASSOCIATION

RESPONSIBLE CARE®

EMPLOYEE HEALTH AND SAFETY CODE OF MANAGEMENT PRACTICES

EMPLOYEE REVIEW

Summary

At the recommendation of the Responsible Care® Public Advisory Panel and the Responsible Care® Coordinating Group, Responsible Care® Coordinators in CMA member companies were requested to solicit employee comments on the draft Employee Health and Safety (EHS) Code of Management Practices. Responsible Care® Coordinators were mailed the draft (June 6, 1991) EHS code, background information on Responsible Care® and the EHS code, suggested questions for soliciting employee input, and a response form. The response form requested a brief description of how employee feedback was solicited and a summary of the four or five most important positive comments and the four or five most frequent negative comments received from employees.

Sixty CMA companies conducted reviews of the EHS code with their employees. Companies used a variety of methods to solicit input, including existing safety committees, ad hoc representative groups of employees, one-on-one discussions, surveys, etc. Many companies solicited input from both union and non-union employees and one company reviewed the EHS code with contractor employees. Some companies provided separate responses from a number of different facilities.

The EHS Code Drafting Group carefully reviewed and discussed the compiled responses from the employee review. In general, issues raised by the employee review have been raised by previous reviews and discussed extensively by the EHS Code Drafting Group throughout development of the EHS code. Many of the negative comments were offset by positive comments on the same issue, e.g., "Code is clear, easy to understand and appears complete." versus "Code language is difficult to understand for industrial employees. Change legal wording so we can understand it."

The EHS Code Drafting Group believes that the employee review provided many valuable comments. While no new major concepts were raised by this review, the EHS Code Drafting Group did revise the EHS code in an effort to improve clarity and consistency. Many of the excellent suggestions provided by employees will be incorporated into the Resource Guide for the EHS code.

Responsible Care®
Employee Health & Safety Code of Management Practices
Compiled Responses from Employee Review

CMA's Responsible Care® Coordinators were requested to solicit employee comments on the June 6 draft of the Employee Health and Safety Code. Each company's response is numerically consistent throughout this text. Please note that some companies provided more than one response. Sixty companies have responded as follows:

- I. Briefly describe how you solicited feedback from employees at your company.
 - 1.A. The Employee Health and Safety Code of Management Practices and background on the CMA Responsible Care® program was distributed to departmental safety coordinators and safety inspectors 12 days prior to the scheduled review meeting. Comments, concerns, and ideas to improve the code were discussed at the review meeting.
 - B. Copies of the draft code were sent to members of the Union/Management Safety Committee two weeks in advance of regular meeting with memo describing code review plans. Reviewed draft Code in depth at regular monthly Union/Management Safety Committee meeting requesting member input during review of each element of the Code.
 - C. A meeting was held with a representative group of employees (3 salaried, 9 hourly). We carefully reviewed the draft and encouraged open discussion as we went along.
 - D. A total of five employees were asked to comment. Four were randomly chosen, hourly employees. The fifth was the plant safety manager.
 - E. In that we are such a small operation (3 employees), we were able to discuss this matter during one of our safety meetings. We reviewed this material as well as all other Responsible Care® material on file.
 - F. The Responsible Care® program and guiding principles were discussed as a part of a plant safety meeting. This format was chosen because safety is one aspect of Responsible Care®.
 - G. On August 12, 1991, all employees were given a copy of the Summary description and Questions and Answers About Responsible Care® and asked to read them. On August 13,

1991, a meeting was held with all employees to discuss any questions and to ask for their comments.

- H. Questions and answers session at weekly safety meeting.
- I. An overview of the draft Employee Health and Safety Code was presented to the Union/Management Safety Committee. Copies of the draft code were provided to members of the Committee and Department Managers for review and comment by hourly and salaried employees.
- J. This proposed code was given to members of both the employee and off-the-job safety committees to read prior to a joint meeting. The new Responsible Care® video on existing codes was viewed to give background before a discussion took place. These two committees represent a cross section of plant personnel and found this process of review very positive.
- K. Due to a short time factor, we solicited a response from our Operating Safety and Housekeeping Committee. The Committee is made up of middle managers or group leaders. In addition, ten non-management employees were randomly selected.
- 2.A. The writers met with a cross section of employees and went over the list of 18 "Code of Management Practices" one at a time. The employees -- hourly, exempt, and non-exempt -- compared the practices to our own plant as a base reference. They were impressed with how near we are to all the practices and offered only limited comments.
- B. Employee feedback to the proposed health and safety code was solicited by having a group of employees review each question and prepare written comments. Copies of the code were sent to 10% of ARL employees selected at random. Of the twenty forms that were sent, eight employees returned the forms. All results reported without names so the comments were anonymous.
- C. Safety meetings, neighborhood visits, employee safety and health suggestion forms, personal {sic} contact and attitude surveys.
- 3. Code distributed to manufacturing sites, Industrial Hygiene Coordinators, Corporate IR and Mfg. for comments. Manufacturing sites held small group meetings (304 people, mostly management) to review code and submitted comments to Responsible Care® coordinator.
- 4. Monthly employee safety meeting with first line supervisors. Monthly safety training sessions by Safety Department. Employee meetings held quarterly by plant manager. Safety hazard communication forms.

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5. Our Safety Team, which was started in 1987, has met over the years to address similar requests. The team consists of employees from all departments representing both hourly and staff point of views. The Safety Team has provided valuable feedback in the development of present day Safety Programs. Therefore, your request enabled First Chemical to utilize its Safety Team to review the EHS Code.
- 6.A. Copies of the employee Health and Safety Code of Management Practices draft were distributed to ten employees -- three salaried exempt, three salaried non-exempt, and four hourly. After instructing them on the Employee Health and Safety Code's role in Responsible Care®, each employee was asked to read over the Code for several days and be prepared to critique it. Each employee was interviewed individually concerning his or her critique.
- B. A series of small meetings were held with representatives of various departments after they were given an opportunity to review the material.
- C. Sent materials to selected locations rather than all plants since this was the first time hourly involvement was solicited.
7. With reference to the June 6 draft of the Employee Health and Safety Code of Management Practices, we have solicited feedback from an employee group in Dallas, Texas. The Dallas facility is one of our largest, conducts diverse activities and its employees are in the middle of implementing "Quality Work Group" concepts. The feedback was solicited during several regularly scheduled safety meetings.
8. Rhone-Poulenc, Inc. is comprised of three divisions. One representative plant was visited in each division to obtain employee feedback on the Code. The AG Division plant was small, employing about 24 employees and is unionized. The Basic Division plant employs about 100 individuals and is also unionized. The Specialty Division plant is non-union and employs over 100 people. Representatives from the plant's safety and health committees were polled at the Basic and Specialty plants. All plants provided a cross-section of employees including lab, production, and maintenance representatives. Plant management did not attend the discussions to ensure adequate opportunities for feedback. The discussions were led by Gayla McCluskey, Specialty Division Health and Safety manager and a member of the Code Drafting Group.
9. Procter & Gamble has had a key element-based employee health and safety system in place for over ten years. This system and the Responsible Care® Health and Safety Code are virtually the same.

Over the years, employees have made many useful suggestions which have been incorporated into our system. Employee-led safety teams exist in each of our plants today. Improvement opportunities are discussed, reviewed, and deployed monthly. From this, we know that employees routinely participate and that they feel our system is effective in promoting their own health.

The proposed code will have an enhancement impact on our workplace. We expect the initial self-evaluation will grade a Stage V and will grade a VI in one year since we go through an annual review/renewal process of the existing key element system.

10. Members of the plant safety committee were given a short talk on Responsible Care® and how this practice fits in. Copies of the practices and suggested questions were given to them and feedback was received in writing. Most felt the code was good as written.
11. Supervisors discussed Responsible Care® with all employees during the monthly safety meeting. Most comments were related to plant or locality specifics, rather than dealing specifically about Responsible Care®.
12. The draft code was sent to each of our facilities along with a cover letter requesting the site have employees respond to the code. The letter contained suggestions which sites could use to get employee response. The sites were permitted to solicit responses in whichever manner they saw fit. The site used two methods to solicit responses on the code.

One method which was used had the code circulated in the plant's safety and health committee. This committee is comprised of all levels of employees. The other method solicited responses from specific employees comprising all levels of employment. The solicited employees are ones which the plant knew the employees would give an honest and frank response.

All responses were then reviewed by this office and placed on the response form.

13. Selected locations were sent copies of the draft code and asked to comment after review. 45% of those contacted replied.
14. Solicited comments from: corporate Health and Safety group and several of our major plant sites. Plant Managers were given the code and supporting literature, and the comments from the hourly and supervisory ranks.
15. Feedback came from a combination of plant location health and safety groups (including production and non-production

employees) and from safety and health professionals within the company.

16. Employees at various locations throughout the United States were selected by the Responsible Care® Coordinator. Their feedback was solicited by written contacts.
17. Since it would not be practical to obtain input from all of our employees in the time frame provided by CMA, we arranged for a representative sampling of employees utilizing three locations. A total of 20 employees participated in a meeting held off-site near one of our divisional headquarter's office. The employees came from 3 different business divisions and from large and small size sites. We used a lecture style overview of the CMA Responsible Care® Initiative and Draft Employee Health and Safety Code and then utilized mixed group breakout sessions to discuss the suggested questions. Each breakout group developed responses and then the individual groups presented their ideas to the combined group, the outcome of which was summarized at Corporate for submission to CMA.
18. We sent out a total of 40 survey questionnaires throughout our company to be completed by randomly selected hourly wage operating personnel. Participation was voluntary and confidentiality was optional. A total of 26 responses were returned.
19. The Employee Health and Safety Code of Management Practices was presented to groups of employees consisting of operators, technicians, supervisors, and staff. Employees from plant operations were represented in the greatest number in the participating groups. The groups discussed each of the management practices and developed the response to the information requested.
20. Requests for feedback were sent to all of our chemical facilities; we asked that a cross-section of employees be chosen, that they be shown the Code draft, and that they be asked what they thought of the code, what they liked and/or disliked about it (i.e., the "suggested questions"). We also requested "general comments". We were amazed at the number and breadth of the responses!
21. Groups of employees representing all departments as well as hourly and salary employees from four UCC&P locations provided their feedback and comments on this code. The four UCC&P locations consisted of 2 large plants (1 union) and 2 small plants (1 union). The feedback module provided by CMA was employed at all locations.
22. Surveys were distributed to a cross section of employees representing management, union and maintenance personnel. Personal presentations and written correspondence describing

both the Code and the questionnaire were utilized. The surveys were prepared with the materials provided by CMA. It was designed to determine whether the management practices were important to the Code, whether additional practices were necessary and what type of impact on the industry as a whole the Code would have.

- 23.A. The Central Steering Committee members of an employee-driven behavior modification program (BEST) that addresses environmental impact issues in their workplaces were asked to read the code and to evaluate the suggested questions proposed to be used for surveying employees about the code. The committee members were given the printed information prior to the meeting and were asked to be familiar with the material before coming to the meeting.
- B. A committee was formed from various areas in the plant. Each was given the opportunity to solicit feedback from their area. The committee consisted of: James Tolley - President, Local 1008; Donnie Tate - Vice-President, Local 1008; Jerry Matheny - "C" Shift; George Paris - "B" Shift; Joe Mack Hatley - Day Lab - Safety Committee; Mike Chism - "D" Shift - Safety Committee.
24. Feedback was obtained from Dow's six divisions using the safety network and division Responsible Care® focal points. Each division selected from line type employees for review and input.
25. Several groups of employees from various work disciplines were selected to review the draft.
26. Background information on Responsible Care® was provided to the group prior to reviewing the proposed draft. The Health and Safety Code was then reviewed with the group. The suggested questions provided with the proposed draft were used to elicit comments from the group.
27. A questionnaire was distributed to a cross-section of employees throughout our company. On this questionnaire we requested employee comments on the understanding of the code and what areas are unclear or could be improved upon. In addition to this cross-section, all other company employees were encouraged to take part on a voluntary basis.
28. Developed questionnaire from suggested questions and sent to first line supervisors with a cover letter describing the purpose of the EH&S code and the importance of their input. Reviewed the proposed code at the Plant Safety Committee meeting and solicited input from the Union Safety Representatives (complete questionnaire). This represented a very good cross population of the plant.

29.A. A company representative attended the O&M area safety committee meetings for the following:

- Explained the background of the CMA.
- Discussed Responsible Care® and how it will be organized here. Oronite Organization Chart was explained.
- Each committee was requested to review the Employee Health and Safety Code and provide a response to the list of suggested questions.

Select individuals in staff positions were asked to answer the suggested questions in order to provide a cross section of company employees.

Responses to the suggested questions were received as representative of a group as well as individual replies. A total of 44 responses were received representing approximately 425 employees.

B. Responsible Care® Coordinator, Brian Odell, met with Plant Safety Team and got three volunteers to participate (Tony Ashdown/Safety Supervisor, Jerry Neader/Material Handler, and Jeff Stout/Production Operator).

He also met with the Health and Safety specialist, Fran Hupp, and she agreed to participate.

Each member of the "Review Team" read the draft code and associated literature.

The team met and completed Question 2 below, which included an item-by-item review of the management practice.

Comments were recorded under Question 2 below. The response was forwarded to John Salmela (Chevron Chemical Company/Responsible Care® Coordinator).

30. Various methods were used by the five Aristech plants responding to the survey. Plant meetings, safety committees, group and individual contacts were used to solicit feedback. The majority of participating employees were wage earners.

31. Plant #1 -- Input from: Industrial Hygienist, Safety Superintendent, Factory Manager, Employee Relations Manager. Copy of Document given to each for comments.

Plant #2 -- 20% of the workplace met and thoroughly examined the draft. At the end of the discussion period, it was requested that the employees make any comments, good or bad.

Plant #3 -- Reviewed code and feedback questions with representative sample of employees.

Plant #4 -- I called a special meeting of the Union Management Safety Committee, which is comprised of an employee from each division along with the Union Safety Representative. We reviewed the information contained in the package on Responsible Care® and then discussed the assignment of reviewing and providing input on the EHS Code. The group felt they would be most effective by individually reviewing the code and then giving me their written comments.

32. The CMA request for employee feedback was given to the chairman of the Directors of Manufacturing and four Monsanto locations were selected as a representative sample - two union and two non-union locations. Through the Manufacturing Directors, Plant Managers and location Responsible Care® Coordinators, material about the Responsible Care® Initiative, the Employee Health and Safety Code, and the questions as suggested by CMA were distributed. Focus groups were formed at the four locations. The focus groups ranged in size from 7-10 (with a total of approximately 34 wage individuals). I conducted meetings with the focus groups at two of the sites - one union, one non-union. The CMA suggested questions were used with all four groups; three locations returned individual written responses; one was provided in synopsis form. The employee groups with whom I met seemed very willing to participate, very interested and asked many questions.
33. Two focus groups were arranged at one plant site. One group consisted of just Amoco Employees from the Maintenance Department -- about 10 employees. The other group consisted of 8 employees for two on-site Contractor companies.

Both groups were given an introduction to Responsible Care® and viewed a recently made internal video on Responsible Care® efforts at Amoco Chemical Company.

Sessions were held during normal work shift.

34. This is in response to your request for additional feedback regarding the Employee Health and Safety Code. I have circulated your draft of this code, dated June 6, 1991, to the appropriate personnel within our organization.

Upon review and further discussions, we feel comfortable with our current response to CMA and have no further input to offer at this time.

- 35A. At Lyondell's Channelview Chemical Complex feedback was solicited from the facility Safety Committee. This group is made up of mostly hourly employees from across the facility and the leader/sponsors are from the Health, Safety & Environmental Area. The Safety Committee obtained input from peers via safety huddles on shift and other safety-related team meetings.

- B. At Lyondell's Houston Refinery input was obtained from employees through three separate forums as follows:

A series of employee meetings set up by the Middle-managers

Presentation to the Union Workman's Committee by the Human Resources Manager at their "Relationships by Objectives" meeting.

Review with the Manufacturing Safety Team by the Site Manager.

36. Each chemical facility was given the opportunity to comment. Each facility chose a cross section of employees to comment on this code. Most used existing Safety Committee representation. The comments were very diverse and sometimes conflicting.
37. Utilized employee Health & Safety Committees at Plants where they existed (33%) and formed them at remaining Plants to review the code and answer a questionnaire regarding their understanding of code. Plant Managers made a presentation on Responsible Care®, and including the Guiding Principles, a review of the six Codes of management practices and the new video tape entitled "Responsible Care®: A Look at Three Codes." These committees will be used in the future to review employee Safety & Health policies and procedures. Employees will be kept abreast of Responsible Care® developments as well as provide input to company policies. This will give employees a feeling of pride and ownership in the area of Health & Safety which they feel is of vital importance to them and the surrounding community.
38. Diagonal - Cross sectional committee was originally selected. Then, even more valuable, was interviewing of each member of the committee.
39. Sent a survey to 30 employees involved in our site Plant Safety & Environmental Advisory Board, Safety Department, and Senior Management. The response was about 50/50 management to employees. Received 62% of the surveys sent out.
40. At one facility we provided six employees copies of the Code and then held a focus group to discuss the elements. At another facility we interviewed about ten employees on the Code. All of the employees had the opportunity to review the Code before the interview.
41. We utilized an existing Employee Safety Activities Committee in a "special" meeting. The Committee is made up of a cross section of hourly employees from the operating, service, and engineering areas. We followed the suggested format and reviewed the history/purpose of Responsible Care® and the Employee Health & Safety Code. We used the suggested

questions to open the discussion, but then allowed the group to pursue their particular interests.

42. Several employees were chosen from those who work either on or closely within plant safety committees. Each employee was given the draft to read and asked to put his/her thoughts down on paper. Each comment was then reviewed, and the employee was asked to expand and/or clarify each written comment.
- 43.A. The format for feedback varied somewhat among plant locations. At all locations, representative cross sections of employees were involved and the employees reviewed the draft Health & Safety Code prior to discussions. At some locations the Health & Safety Code was reviewed and discussed by either the joint Union Management Committee or as part of safety meetings. At other locations special sessions were held.
- 43.B. Small group sessions which included joint Union/Management Committees, Plant Safety and Health Committees, employee safety meetings or special sessions. Responsible Care® and the EH&S Code were introduced and made available for review and comment.
44. The group which OxyChem selected to give feedback on this draft code were participants in an OxyChem Safety Congress. They are a representative sampling of our employees throughout our domestic manufacturing facilities. The questionnaire was administered by our Responsible Care® contact using face-to-face meetings to explain the concept of the employee review and the details of responding to the questionnaire. All responses were confidential.
45. Gave the Safety Committee members (27) both exempt and non-exempt a copy of the draft of June 6th. This memo was sent on 7/15 for an 8/12 Safety Meeting discussion.
46. This is the only response from BP Chem on the H & S Code. {No indication was given as to how comments were solicited.}
47. Three locations participating in Shell's implementation of the CMA Responsible Care® Code were visited to obtain first-hand employee input regarding the H&S Code. The locations ranged in size from 325 to 2500 employees; two have unions, and one does not. There were two refineries, one with some chemical operations and one chemical plant. A two-member team consisting of a member of the CMA code drafting group plus an experienced H&S person made the visits. The meetings were with employees involved in various safety committees at the location. Most were hourly, but some staff including professionals were involved.

Participants in the meetings were provided copies of the June 6, 1991, version of the code for review prior to the meeting. The meetings started with a background refresher on Responsible Care® using a 15 minute CMA video and oral presentation. This was followed by a review of the general purpose of the code, the role of the PAP, and then the specific code elements, one-by-one. At the end of this review notes of the discussion were reviewed for comments. These sessions lasted two to three hours.

48. Reviewed Responsible Care® with Plant Safety Committee (12 people).

Explained what a "Code of Management Practice" was and how it works.

Reviewed 18 points.

Discussed questions and solicited feedback.

Collected responses at end of day.

49. The Employee Health and Safety Code, Code questions and information on Responsible Care®, along with a cover letter requesting feedback, were sent to ten persons representing Senior Vice-Presidents, Plant Managers, Human Resources & Environmental, to six union employees and one company doctor.

50. We conducted a survey of employees who were randomly selected from our work force at several locations and did not include any supervisory personnel. We wanted to get down at the "grass roots" to determine what people knew about both Responsible Care®, as well as Employee Health and Safety Code of Management Practices.

51. Final locations were requested to share the code with employees by the most effective method, including standing safety committees or special ad hoc groups. I have attached the response from one location which used a reasonable procedure. The feedback received was typical of that received from other sites.

NOTE: We all need to do a better job of reaching hourly employees and soliciting their input. This will be an area of emphasis in the future.

"The Plant Superintendents from Maintenance, Operations Area I, Operations Area II, Loading, Packaging and Shipping, and the Q.C. Laboratory were contacted and requested to solicit their employees with the lowest number of overtime hours. Those employees received the lead-in remarks, as suggested, and a hand-out with the background information supplied by Rick Charter. After the employees had read the Employee Health and Safety Code of Management Practices, they were

given the questionnaire supplied by the Chemical Manufacturers Association, along with questions we had added. Upon completion of the questionnaire, each participant received an evaluation form to evaluate how they felt our location measures up to each of the 18 practice statements."

52. The materials were provided to thirteen UOP operating locations and feedback was received from nine of the thirteen. Each operating location solicited feedback from a cross section of the employee population. All of the operating locations used the suggested questions for soliciting employee input.
53. A meeting was held for 14 West Memphis CPS employees that were asked to participate in the Responsible Care® survey. The concept of Responsible Care® was explained and a handout of background material was distributed. The employees were asked to respond to the questions concerning the code of management practices for employee health and safety.
54. Five facilities from five operating units of the company were selected to participate. This group provided a balance of manufacturing and distribution facilities, handling a wide range of materials including organic chemicals and solvents, inorganic acids and salts, specialty resins, and thermoplastic polymers. A person was named at each facility from the management or supervisory staff to select a cross section of employees and solicit the feedback. This was done in a group and/or individual sessions after distributing and reviewing the CMA draft code and the materials describing the Responsible Care® initiative. Responses from the individual facilities were then reviewed and selected statements were compiled to provide the response detailed below.
55. The Plant Safety Committee, consisting of eight members from a cross section of the plant, were given six copies each of the material to be reviewed and questions that were solicited. These were then passed out to employees for their responses. Their responses were then consolidated and are listed below. There were 48 copies distributed with 17 people responding.
56. Requested all first-line supervisors in our manufacturing, maintenance, warehouse, and waste treatment areas to select one hourly employee on their crew to provide feedback. I provided instructions as well as a list of suggested questions to the employees designated to participate. Many of the employees talked to me as they were working on their responses (to seek clarification or additional information). 13 of 16 questionnaires distributed were returned.

57. Feedback for the Employee Health & Safety Code of Management Practices was obtained from our plant personnel in our Chicago branch. The material was presented to our personnel by posting the material that outlined the code for approximately four weeks. Each individual was asked to review the material at their leisure. After four weeks Responsible Care® and the Employee Health and Safety Code were formally presented to our plant personnel. During this time employees brought forth questions and their comments concerning Responsible Care® and the code.
58. A random selection of employees were mailed a copy of the Code and a list of questions concerning the Code. Employee response ranged from 40-60%.
59. Hercules queried 20 people at one plant and 18 people at our Research Center in response to your request for a canvas of our employees. The population represented managers as well as hourly workers. There was a great deal of concern at other locations with regard to introducing the questions to the workforce.
60. A meeting was held to go through each of the Code elements. This group was comprised of approximately sixteen people -- 50% labor, 50% management.

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II. Please list four or five of the most important positive comments and four or five of the most frequent negative comments received from your employees. Please provide suggestions for alternative Code language where appropriate.

- 1.B. Other than agreement with the code concept and the various elements, there were no comments - positive or negative - from members (3 union/5 management) of the committee. Many of the items are programs in place at the Kalamazoo plant, so the concepts are not new to plant personnel. This may be the reason for lack of concern.

Positive

- 1.A. The safety coordinators and safety inspectors generally considered the draft Code of Management Practices for Employee Health and Safety to be complete. There were no recommendations to add any items to the code.

C. "I'm glad to see that our Company is doing the right thing."

"Many of the points in the draft are already part of our routine."

"Our Safety Manager often seeks our input in finding ways to make our jobs more safe."

"My Manager is committed to safety."

"I'm proud to work for Cyanamid."

D. Sounds like most of the programs we already do.

Meetings with neighbors and open houses are good ideas.

Beneficial to employees because changes to benefit community will likely improve plant safety.

Use of HAZOPS, readiness reviews, etc., for new and existing processes is good.

E. "This is nothing new. These are things that we have been doing for years and will continue to do."

"I feel that we go overboard in answering peoples' questions and concerns while still keeping a somewhat low profile in the community."

"With our product, Calcium Cyanide, we must be responsive and professional, or we would not be allowed to operate."

F. The general positive comments were that it is good that something is trying to be done.

G. Employees felt the company was going in the right direction.

Employees thought it was good for the public to know about plant operations and the chemicals used.

H. Communications and training is very good.

Recognize and respond to the needs and concerns of the community.

Continuous efforts to protect the environment.

Continue to search for ideas to improve the code practice in our operation.

I. The code is complete and seems to address the necessary elements of an effective employee safety and health program.

The housekeeping and emergency medical assistance aspects of the code are important.

Training and communication provisions of the code are very important even for office employees.

The Plant already has the elements of these codes in place through existing safety and industrial hygiene standards and requirements. As such, employees will continue to benefit through the application of these requirements, particularly in the areas of communications, training, hazard identification and control.

The local management's commitment to applying the code elements determines whether or not they are truly implemented or just exist on paper.

J. "It's simple and to the point, anybody who wants to do business today must get with it"

"I think that it is great that Cyanamid is part of CMA and Responsible Care® and follows such principles"

"All chemical companies should sign this code and live by it"

"This code seems just like what we at Santa Rosa have been doing for many years"

K. A statement of commitment by all member companies.

The code is geared towards public concerns real or perceived.

Establishment of minimum standards of management practice.

Inclusion of employee opportunities to participate in developing programs.

2.A. The most prevalent positive comment was that they can definitely see a turnaround in the Company regarding its concern and care of its employees and neighbors. Even though these specific "practices" have not been finalized as such, the philosophy of Employee Involvement, and CMA's Responsible Care® are being practiced. Communication seems to be the real key to the turnaround and these practices document what has been done and what is needed.

B. The most frequent comments were: 1) it should improve safety in all plants; 2) employees will see management supports safety; 3) will cause continuous improvements in the safety program; and 4) all employees will be involved in the program.

Several people commented on the importance of Item 3 pertaining to contractor's safety programs.

C. Everyone in the plant is committed to a good safety and health program.

Excellent training program.

Excellent management employee interface.

Rewards and procedures are impressive.

3. Follows our own general operating principles but will require us to evaluate and improve current systems.

Employee involvement will help improve programs and help gain employee and public support.

Contractor evaluation of their safety programs has been needed.

Program will help (force) documentation.

4. Employees were impressed with the effort put into process safety.

Also impressive is the expenditure the company is willing to put into technical/engineering safety controls.

They like the fact that we furnish uniforms so they don't have to launder.

Also noted are all efforts put into safety training.

5. The team was impressed with the implementation stages. Also felt that CMA was right to make Code implementation a condition of membership.

The team felt the Medical Surveillance is very important. More important is to blend an employee's personal needs along with work-site hazards.

Exposure Assessments that provide an employee immediate results, whether good or bad, are very important (e.g., we have a noise survey currently being held on-site that includes the results being issued at the end of his 8-hour shift.).

The team felt that First Chemical is very good about telling them the facts about our chemicals and their risks. This sharpens their awareness.

Any formal Documented Training with objectivity is needed for a Company's Improvement in Work Practices. In other words, measure an employee's skills and not personality.

6.A. Well written.

Does a good job of projecting a positive image for the chemical industry.

The emphasis on employee participation is good.

The section on Prevention and Control is very timely.

Under the Program Management section, the attention to on-site contractors is much needed.

B. Positive comments focused on the need for the overall programs. People feel it will help with communication both within the plant and with the community.

C. Clear and understandable.

Commitment of all levels of management.

The code is backed by periodic evaluations.

Emphasis of extensive employee involvement.

Safety reviews early on in the life of a project.

7. The company is meeting most code elements today.

The emphasis on community involvement is good.

8. Employees were supportive of the overall effort and were pleased that the industry was attempting to gain a more favorable public image. They like the fact that contractors were included under the Code.

9. "Looks like what we are about."

"Explicit management support and adequate training of all employees is essential."

"Our teams and routine Behavior Observations by employees improves our knowledge."

"Good to see other companies using safety programs that work for our plant."

11. Community Outreach is an excellent idea.

Improved employee confidence in their jobs will be one of the results from an outreach program.

Improved community understanding and better company/community relations will be a benefit from Responsible Care®.

12. The general feedback from most of the participants was that the code was complete and comprehensive. It will be effective and ultimately benefit all departments provided management shows full commitment to it. This basically summarized the positive comments.

13. Long term outlook for everyone's health will improve with program.

The environment will certainly benefit.

It's always cheaper when you do it correctly the first time.

Safety procedures are most likely to be implemented when they are convenient and simple.

14. This code can be considered the most important code of the CMA Responsible Care® Initiative because it deals with the health and safety of the employees.

Medical monitoring and medical surveillance are stressed in this code.

This code will have a positive effect on other areas such as safety, emergency response, and acceptance by the community where chemical plants are located.

This code will influence new design and modifications of existing facilities rather than addressing health and safety after the fact.

This code stresses preventive maintenance.

15. The code contains all of the necessary elements of an effective health and safety program. BF Goodrich is in compliance with those requirements. No other specific comments regarding individual code requirements.

16. Half of the employees who responded to our request for comments indicated they felt the code was fine as it is presently written. The other half of the respondents fully agreed with the great majority of the practices contained in the code.

17. Good to solicit hourly input; should do the same for other Codes.

The overall goals of the Code are good; safe work environment, etc.

Inclusion of contractors is important issue.

Good to see management put down in writing their commitment to safety and health protection.

18. 92% of respondents understood the purpose of the code.

96% understood how the EHS Code related to the Responsible Care® Initiative.

96% said the code adequately addresses management and employee involvement.

96% said that employees will benefit from code implementation.

85% said the code would affect the work place.

- contractor safety and training would be consistent
- higher overall awareness

The following were considered the most important practices: Medical Surveillance; Training and Communication; Hazard Identification, Evaluation, Prevention and Control; and Preventative Maintenance.

73% said that communication and training management practices were adequate to assure that employees are informed of relevant health and safety information.

88% said the meaning of the practices were clear.

19. It was believed the Code would help pin down accountability for the development and implementation of improved health and safety programs and will be viewed positively by employees and the community.

The Code addresses a very important but often neglected area of contractor safety awareness.

The Code is well written; it does not appear to be written by a lawyer.

Operators appreciated the opportunity to leave input to the drafting of the Code.

Those participating in the survey supported the recognition by the Code of Management practices of the importance of employee, contractor and community health and safety.

Item No. 7 is good. Health and safety input is needed up front with planned or existing facilities.

20. A step in the right direction; employees will benefit; good focus on continuous improvement; glad it includes contractors; employee awareness of responsibility and accountability is key to safety; long overdue; let's carry it out!
21. The code will help improve awareness in health and safety. The code calls for commitment from upper management, not just talk. The code provides for employee training. The code will lead organizations to become more cohesive because of how closely management and employees will be working together. Contractors need to become associate members of Responsible Care® or develop a system of their own.
22. "Keep up the good work."

"Increases employee awareness of health and safety hazards and the procedures to minimize risks to hazards."

"If just one person is saved from being injured or contaminated with dangerous chemicals, it will be a benefit."

"I believe employees could benefit from implementation of this Code even with the existing programs as good as we have."

"Both management and employees know that problems exist and in an open environment with positive commitment from both sides, things have to improve."

- 23.A. Unlike the code, which contains some wording that is generally difficult to read and understand, the suggested questions, with the exception of the 12th question, are clear and concisely written.

The employee participation aspect of developing, implementing and reviewing is excellent!

We like the verifiability aspects of the written programs under the code.

We like the measurement aspects for determining program effectiveness, especially in the area of health and safety training.

- B. The committee is in agreement with these practices with the following comments:

- o Instead of having opportunities, it should be mandatory.
- o Needs to be a top priority.

24. Encompasses all aspects of safety.

Very positive step in developing a code for managers in safety and health programs.

Addresses preventive maintenance.

The statement on relationship to other codes of management practices is excellent.

Training and communication practices are written well.

25. Code appears to be fairly complete.

None of the elements seem to be out of line.

Tracks fairly well with our current practices.

Most companies should have this already.

26. Used as a baseline, this will be a good start for those members that do not have such practices in place.

27. Employees will benefit from implementation of this code.

The code will help make work areas safer.

Implementation of these principles will lead to higher productivity.

The code is easy to understand.

28. All respondents understood the purpose of the code.

A good start in enlisting employee participation in implementing the code was having them comment on the draft. Have hourly worker co-chair monthly safety meeting with supervisor. Involve workers in safety and hazard audits.

Employees will ultimately benefit from the code by having direct participation in safety and health matters affecting their working environment.

Important practices - mechanisms for reviewing design or modifications of equipment; preventive maintenance; safety training.

Communication and training management practices in the code are adequate. Format is good.

Code changes for more effectiveness - overall comments indicate that the code itself doesn't need any change. Its effectiveness will come from the commitment of management and the employees to the practices ascribed.

- 29.A. If this code is implemented, everyone will ultimately benefit. The employee in the form of a safer, healthier workplace, the community in the form of a cleaner environment, and management in the form of fewer accidents and lost workdays.

Responsible Care® is a step forward not only for Chevron but for the entire chemical industry. Public perception of the industry will be improved. The operator on the job will be educated in the handling of hazardous substances resulting in a safer workplace. With committees set up to deal with aspects of R.C., employees will feel as though they have a say in plant operations.

Management has a commitment to protect and promote employee health and safety. Employees will have greater opportunities to participate in developing health and safety programs.

- B. This review process allowed opportunity for input into code development by a broader range of employees. This should continue and be expanded.

The Draft Code was made available to a wider group of employees for comments. The process also served as a Responsible Care® educational tool.

Most of the Management Practices in the Code are easily understood.

30. Program elements cover all important safety topics.

Public awareness elements of Responsible Care® seen as a big plus.

Employee involvement in code seen as important goal.

Code promotes company to pro-actively manage safety.

31. We're probably in Stage VI for implementation.

Easy to understand and covers all areas.

Opportunity for involvement groups/projects.

Excellent; very good.

Covers everything.

Looks good to me.

The code is very comprehensive.

The code addresses employees and their concerns.

The code provides for employees' participation - this is important.

The code makes health and safety #1 priority of companies.

The implementation of the code will improve the quality of worklife.

Employee involvement (addressed in #2) is viewed as critically important. This was mentioned by several people.

Several members of the group felt the code was comprehensive as is and had no comments.

32. Employee involvement was viewed as essential (one said it should be mandatory).

Another essential practice of frequent mention was the support of top management.

Training and communication were mentioned frequently as vital to health and safety programs.

When asked which practices were viewed as most important, the usual response was "all of them."

- 35.A. Employees feel Lyondell has a safe workplace.

Code will provide a means of checking and testing existing programs.

Code will increase safety of the working environment and promote enforcement of the existing programs. Monitoring by HS&E Departments is critical.

Management commitment and employee involvement and participation are seen as critical elements of code practices.

Would keep all recommended practices, but possibly revise wording to improve employee interest.

- B. Practices consistent with OSHA guidelines.

Inclusion of Contractors excellent.

Documentation needs fit with Health, Safety, and Environmental Programs, ISO-9000 and quality programs and requirements at our facility.{sic}

Employees felt our goals and activities are very consistent with Code Practices.

Code Practices are comprehensive.

36. "The code appears to be very thorough, comprehensive."

"Having written procedure and practices are good."

"Having input from all employees is good."

"Liked the statement 'Commitment by all levels of management'."

"Easy to understand, good length so should be easy for those responsible for implementing the Safety program."

"Employees and community will benefit from a company that is concerned with their welfare and value their opinions."

37. Code will help in the on-going concern to make our workplace and community a safer and cleaner environment.

Code ensures a safe workplace because industry must abide by it.

Anytime employees feel that they can voice their opinion on what happens around them, they feel more satisfied with company policy.

38. #11 and #15 - "very good." "We need regular equipment and process reviews.

#18 - "Can never get enough training."

Our plant follows 95% of 1-18.

39. The codes were easy to follow. Our site currently follows most of the codes. Code is good but the implementation throughout the industry important. The purpose of the code is to protect facility personnel by identifying and eliminating hazards. Employee involvement, as indicated in item #2, is very important.

40. The comments we received were all very favorable. The general feeling was that it would be a very positive indication of commitment on the part of the company if this Code was diligently followed.

41. Code is clear, easy to understand and appears complete.

Consistent with Site policy and procedures, but provides "stretch" in some areas.

Glad to see employee participation addressed.

Felt most value for the "Identification and Evaluation" and "Prevention and Control" Code elements.

42. The code is very thorough in its present form.

R & H is making a sincere effort to respond to the public.

Changes seem to be moving us in this direction.

Manager's (CMA and R & H) are very responsible and will run our plants in a manner that will not willfully harm the communities around us (as well as our own people).

The draft outlines a direction parallel to the plant's direction (especially with the community).

- 43.A. The Code provides opportunities for increased employee involvement in development and implementation of Health and Safety programs.

The Code defines comprehensive programs in Health and Safety.

The Code focuses on continued improvement in Health and Safety areas. This will be a key to facilitate implementation of new programs.

The Code will bring about increased employee awareness on Health and safety issues.

PPG already has programs in place to cover the majority of the Code elements.

- 43.B. Meaning or purpose of the Code is clearly stated.

The Code provides opportunities for increased employee involvement in development and implementation of Health and Safety programs.

The Code focuses on continued improvement in Health and Safety areas. This will be a key to facilitate implementation of new programs.

The Code will bring about increased employee awareness on Health and Safety issues.

The Code is a positive idea and should benefit employees.

44. The management commitment to do much more than just talk about safety.

The opportunity for employees to be involved in developing, implementing and reviewing health and safety programs.

This Code makes management accountable and assures provision of adequate resources, including qualified health and safety personnel.

Provides an excellent means for identification and evaluation of health and safety rules.

45. Learned more about what CMA really does.

Identified some areas such as community concerns, where we could improve our company's perception.

Good general overview and questions in the back were the most helpful.

46. I find the 18 elements broad enough to capture most of what good health and safety management is all about.

47. The code covers "all" major H&S personnel safety program areas - just needs fine tuning, no major gaps noted.

At all 3 sites the people involved and the management appreciated the opportunity to participate.

Already "doing most of it!"

48. All of our employees felt the code covered safety and health of workers well. They had no suggested changes.

They also indicated that much of the code seemed to be covered by existing policy and practice.

49. "I understand and support the Responsible Care® program.....it's one of the best general programs....."(union employee)

Code will benefit the employee by developing safer practices in the plant.

All aspects of the Code are important. None should be deleted.

Wording of the Code is clear.

The most important Management Practice is #1- Management Commitment.

50. This code should improve the awareness of industrial health programs, which will improve the work place environment.

VVV 000007792

Our safety program is working well at this location; however, the implementation of this code could only improve and add to our existing health and safety programs and practices.

The majority of the respondents felt that the management practices were adequate to assure that employees are informed of relevant health and safety information.

Through this, all employees will be able to have input on their work environment.

Ideas from employees would help implementation of codes.

51. All employees expressed that the code practices are a very positive approach to improve Health and Safety records.

Employees felt the code was well written, with respect to content and thoroughness, making it clear and understandable.

The general consensus was that most of the code is probably being conformed to now, but there are areas for improvement and that the code practices are a means of accomplishing the needed changes.

Several general comments, not necessarily positive or negative, were made by employees in respect to how the codes could be implemented at our facility, which we feel is a definite positive aspect of their participation in the questionnaire and evaluation process.

52. This program is more than a "quick fix" or incentive program. It addresses concrete issues.

The Code provides additional emphasis on programs which are already in place.

The Code includes provisions for on-site contractors. This is a most welcome emphasis!-

The Code encourages open communication with the public. This is a very good thing.

53. Code was thorough and well written.

Code was pertinent to all aspects of health and safety.

Chemical industry was taking a positive step to inform employee and the public about health and safety issues.

The code will directly lead to site improvements in the area of safety and health.

54. Helps satisfy employee need to be educated.

Program seems to promote proaction not reaction.

Will help employee better understand materials being handled.

Code requirements for contractors are particularly appealing.

Employees are very concerned about low level chronic exposure assessments.

Employee participation is a very positive aspect.

55. This is a positive program with excellent goals.

It addresses concerns of everyone - employees, community and the company.

It should help the environment and assist all of us in working safely and responsibly with chemicals.

56. Should help identify potential systems failures before someone is injured (people like the emphasis on "designing out problems" rather than just holding operators accountable).

People like the fact that training is emphasized and, if anything, would make it even stronger. Would like specific training tools/programs/etc. for unit operation.

Items 11 through 18 -- and especially items 11 through 13 -- received numerous votes as being the most important. Others thought items 7 & 8 or 1 through 6 were the most important.

In general, employees found the Code clear, easy to understand, and "common sense".

Many reviewers emphasized the importance of recognizing/rewarding employees for safety-related activities (e.g., through a Suggestion Program).

If followed, this Code will provide "reassurance" to employees regarding their own health and safety.

57. Employees felt overall that they were working in a safe environment.

All agreed that safety was important and not overlooked.

All agreed that operations and procedures were maintained and current.

Employees felt that monthly safety meetings allowed them to present problems within their work areas, and implement corrective procedures if necessary.

There appeared to be no problems in the language of the code. Employees stated that the code adequately addressed management practices that should be maintained.

58. All employees will benefit from the code.

Code covers all the areas it needs to cover.

Code will help raise awareness of health and safety issues.

Most employees agreed that the Corporation has an effective medical surveillance program.

Most employees agreed that the Corporation is committed to protecting employee health and safety.

59. "The meaning and intent of the code is very clear.
Continuous improvement should always be a priority."

Question #4 - "Yes, any involvement or participation is good."

These codes should "result in better management and procedures."

"The more safety is communicated, the more people will be aware of the surrounding environment."

"Any program which will make our workplace safer is beneficial to all workers."

Negative

- 1A. Several people commented on the criticality of Items 17 and 18 relating to communications and training of employees in job specific health and safety issues. There were no recommendations for adding elements under training or for changing any of the wording. But concern was expressed about the real challenge of effectively implementing the communication and training provisions.

- C. "What took so long?"

"I get headaches when I work on certain jobs."

"How dangerous is the smoke coming from the sealing operation?"

Why use such a big work like multidisciplinary? What does it mean?

Re-phrase the second sentence of the second paragraph of "Purpose".

- D. Not enough responsibility on hourly workers.

Question on rating practices is inappropriate; all seem equally important.

Nothing said about visitors to plant; visitors must be made aware of hazards and rules.

Industrial trend data should be more definitive and include some data from the community to show effects there that may not occur in the plant.

- E. Only negative comment was that in many cases, "the code" is very general and could leave compliance subject to interpretation.

- F. The negative side was that little or nothing actually will be done.

- G. Employees were concerned that other companies may not be adopting this code.

Employees were concerned about past damage that may have been done (hearing loss, etc.)

- I. It was suggested that industry trend data on injury and illness rates include measurement of "close call" incidents.

It is possible that the letter of the code could be met without meeting the intent of the code, depending on

management commitment.

- J. "The code should stress more employee activity such as committees and audits"

"Some plant might need more detail on how to put this code into place."

- K. Statements of practices are so abstract and general as to be without definite meaning and are able to be interpreted with too much latitude.

No indication of consistent goals to be met or time periods for implementation.

Public opinion in North America is formed by media which reports on events worldwide. The image of the chemical industry will be affected by incidents outside the US also. The CMA has a limited ability to improve the chemical industry's image unless they address these codes abroad, too.

Sounds like "Motherhood and Apple Pie."

Suggested Improvements:

Under "Management Practices" add:

#1 - "Inspections and audits to verify that accountable management is indeed implementing these policies."

#3 - "Inspections to verify that contractors working on site do so in a manner consistent with management practices of this code."

Add to "Management Practices":

"Provisions for rapid deployment of personnel specifically trained to control and mitigate release of hazardous materials."

"Provisions for safe and immediate removal from the workplace and disposal of chemical waste."

- 2.A. There were no negative comments per se, but they did recommend Management Practice #1 be more specific than "all levels of management." There is presently a surprising gap in many companies between upper management and the hourly worker. The statement could be revised to specifically name the levels of management.

- B. The most frequent negative comments dealt with attitudes and beliefs that the industry really means what they say.

- C. Middle management commitment needs improving.

VVV 000007791

Established work practices should be reviewed and upgraded.

Preventative maintenance program needs improving.

General housekeeping needs improving.

The safety awareness level needs improvement.

3. Personnel resources are limited. It is important that the CMA program compliments {sic} current and upcoming regulations so as not to create an additional burden.

The job assessment and analyses will require a great deal of qualified resources.

The medical proposal will be expensive.

If not so intended at present, the "industry trend data" should be the same as OSHA reported data to avoid separate reporting needs.

4. Why they have to wear so much equipment, i.e. safety glasses, hard hats.

Why they can't have beards with a respirator.

5. Security is a strict and formal sense and in a small chemical company will only burden the employee. Small companies need the flexibility to address and correct its own security problems. However, large companies need the formality.

Require specific certification on heavy equipment. Such as: Forklifts, Cherry Pickers, Backhoes. The team felt that CMA was vague on this issue.

Companies should educate its work force on all long term exposure assessments and be flexible if these hazards are eliminated through engineering controls.

- 6.A. If this Code results in a lot of additional documentation, paperwork, etc., without resulting in a safer operation, then it is not worth it.

The Code should emphasize that more weight be given to ideas and suggestions by employees.

The language of the Code is a little too general in nature -- sounds like a politician wrote it.

The Code could possibly be written more in layman's terms.

- B. Negative comments included are that the information is somewhat wordy, and many people won't bother to read it. Others were that perhaps there should be evaluations every

six months and not just once a year. Another comment was that the code should focus also on action and not just communication (i.e., that many times things are brought up, but no action is taken).

C. Some employees expressed concern over medical assessments.

Time required to assure compliance may be a bottleneck on new projects.

How does (CMA?) assure that all companies evaluate themselves fairly?

Industry trend data will be difficult for other than safety statistics. {sic}

7. Too long. Too wordy. Repetitious.

8. Employees were not favorable to the "management practices" approach. They questioned why employee responsibility was missing. They thought the Code was too vague in many areas. Other negative comments generally focused on whether the CMA Companies realized the amount of money and effort required to implement the Code.

9. The few negative comments might be summarized by "I don't understand why all industry isn't doing what this code outlines."

10. No mention is made of a commitment to publicize safety and keep it in front of people constantly.

Visitor safety is mentioned in first paragraph but is not aggressive in management practices except for contractors.

11. This program could generate large volumes of paperwork.

Plants will need the resources to complete the many aspects of Responsible Care®.

Community outreach could stir up a "hornet's nest" in the community.

12. Several people questioned the term "employees" in Program Management practice #2. They were wanting further definition on this as to what is meant by "employees."

Comments were received asking what is meant by "employee medical fitness" in Identification and Evaluation practice #9. What does it mean to be "not fit", how does this impact on persons who may be hurt at home and at work and how will this impact upon A.D.A.?

With respect to security some of our employees believe that this is a difficult area to have control, and if someone really wants to enter a facility, these security procedures can be easily circumvented.

Employees' understanding of the code was of major importance. Employees thought this was critical for meeting the code. This could be done with separated code items as part of the code guide for compliance. Items to be included would be a Responsible Care® committee made of all levels of plant personnel, employee participation in the program mandatory, monthly meetings with rotating employee involvement, annual reviews with employees including past, current and future trends, and mandatory employee training covering the code.

13. Need more outside checks to make sure it's done correctly.

Unless the public gets involved, they won't believe us.

Hard to convince anyone that it is being done safely after it was done wrong for so many years.

Need system to document and verify safety inspections.

Major problem -- small remote plants with 1-5 employees seem to be a compliance problem.

14. Large corporations with plentiful resources will implement this code and other codes very comfortably. However, small or even medium sized companies may struggle.

The code places additional burdens on an already understaffed plant to implement and maintain yet another program. Where does it all end?

The Health & Safety Code seems to duplicate many of the provisions in the other Codes, especially the Process Safety Code.

Sounds like it was written by a damn lawyer. Need to make it understandable to all!

15. The title of the Code focuses on "Employee" health and safety. Intent, as reflected in the purpose, goes beyond employees and includes all contractors and visitors to a site. This broad scope should be reflected in the title, thereby making the code more comprehensive. May wish to consider the more comprehensive title of "Personnel" Health and Safety.

Also, the scope of the Code should include all locations in a company. The term "worksite" implies a factory or plant

location, while the code is also applicable to offices and laboratories.

Reporting of injury/illness rates should be tied to specific industry type (e.g., by SIC code). Injury/illness reporting should parallel OSHA guidelines.

Do illness/injury statistics cover contractor or temporary employees at a site?

Do stats include or exclude sales staff hours if they report through a central office of a manufacturing site?

ILCI program addresses majority of code requirements. BFG guidelines address many. There will be challenges to implement some provisions, but all are achievable. Many practices already are in place.

16. There was no instance of an overall negative reaction. The most significant suggestions regarding the draft code are: 1) "Program of Management" should include the establishment of an appropriate enforcement/disciplinary program for repeat violations of safety rules; 2) Practice No. 9 pertaining to the medical fitness of employees for specific job task does not spell out the need for the health assessments involved to be a joint labor/management function; 3) Practice No. 14 should include the designation of specific individuals as responsible for implementing corrective action plans.
17. The Code language is too vague; therefore, it is difficult for the average worker to see what is in it for them and, as such, does not encourage their participation.

Priorities will need to be set; management will have to assure that implementation of the Code elements is a "must-do" item, or it will not be fully implemented.

Employee participation and empowerment in safety need to be more evident from the Code. We need to move from being task driven to ownership driven to improve safety and health. Seems the Code is still coming down from management and is not as team-oriented as it should be.

The Code does not address the current safety and health improvement philosophy utilizing recognition of safe behavior and encouragement of the development of self-accountability and responsibility for safety and participative problem solving.

Is this Code really a stretch for industry, or is it just stating in writing what we are or should be doing?

The Code should include encouragement of off-the-job safety and health.

VVV 000007801

The Code should make reference to member companies having mechanisms in place to address employee concerns regarding safety or health. The Code addresses getting employee input for procedures, etc., but does not require a feedback communication system to address employee concerns, etc.

The Code should spell out the importance of sharing information with all personnel at all levels (hazard-evaluations, action plans to address Code, etc.). This should be both within a department, unit, plant or community and could be added to element #17.

Ergonomics should be mentioned in Element #8.

Should the Code include an element on Substance Abuse? Is this a part of Element #9?; if not spell it out somewhere.

Employee training requirements and certification should be included in the Code in Element #18.

Element #15 regarding security should be changed by eliminating the word "unauthorized". Procedures should be in place to control "entry" of personnel, etc., not just "unauthorized entry".

Element #2 should be enhanced by adding the word "encouragement" so that it would read: "Opportunities for and encouragement of employees to participate in developing, implementing and reviewing health and safety programs."

The word "timely" in Element #14 should be more specific; this was viewed as not being a strong enough statement. In addition, the group felt that the quality of action plans to prevent the recurrence of accidents needs to be highlighted better in the Code element.

Employees need to be included in the design and review of facilities, equipment and job tasks in Code element #11. Engineers must talk to the people doing the jobs about ideas to improve safety, etc. The Code does not seem to stress this issue anywhere.

Is Element #5 talking about audits and inspections?; if so, why not just spell it out?

18. Emphasize employee participation training and awareness. Solicit employee participation through advertising and communicating the importance of the code.

Assure that health assessments and medical physical fitness are controlled by a qualified medical doctor.

Refusal to Work Procedures should be included to address hazardous work conditions.

Emphasize safety personnel training and resources required.

Assure a formal management follow-up system exists.

19. The Code needs to provide a system for employee participation in the assessment process for company's Employee Health and Safety Management Practices.

There was concern expressed over responsibility for contractor training and safety and how to meet the expectations in this area.

The Code does not put enough emphasis on individual responsibility for health and safety problems.

The Code makes use terms such as: program management, exposure assessments, safety analysis, hazardous chemicals, multidisciplinary means to identify and assess hazards, etc. Supporting literature should help define the terms and the expectations for the Codes of Management Practices.

Employees expressed a desire for stronger emphasis on sharing of health and safety information as it relates to specific work place groups.

20. Too vague; improve generalities; needs "Employee Commitment" section. Will code really make a difference in the workplace? Have formal audits to verify self-audits; section headings should be more descriptive. How will Code be tracked to insure compliance and show it is working? Most frequently used word: Commitment -- on part of both employees and management.
21. The code is too vague and general -- needs more how to's. The code should specify more "direct" involvement from upper management in location health and safety activities. Budget constraints can hamper program implementation.
22. "Just another program."

"Only see changes after someone is hurt."

"More to do with less people."

"We already have safety problems no one is concerned about."

"Management practices 1 and 2 are pivotal to the success of this effort."

"Can work to the employees ultimate benefit only if employee "buy-in" is truly achieved."

- 23.A. The use of the phrase "multidisciplinary means" is fuzzy and will be misunderstood by employees. (Unfortunately, in many employee's minds -- discipline means punishment).

The wording in the Code is not, in general terms, written for employees who are not university educated.

In the 12th question, does "format of code" refer to the arrangement of code items, or does it refer to actual content or substance of the code itself?

Realizing that a separate code is to be written for pollution prevention, it is still strongly felt by this group that environmental aspects impact health and safety areas such that most statements in the Code should read, "environmental, health and safety..." rather than just, "health and safety..."

- B. The committee is in agreement with these practices with the following comments:

- o Health and safety personnel should be certified, not just qualified.
- o Should follow current published standards.
- o Assessments need to be posted.
- o Too vague -- not clear.
- o Systems verified by a certified person.

24. Very technically written -- please simplify.

Too difficult to understand.

Clear on management involvement not on employees.

Parts are vague on whether or not contractors are involved.

25. Fitness for job tasks could exclude some employees from some jobs.

Commitment by all levels of management is difficult to measure and achieve.

Contractor control is difficult to achieve.

Uniform housekeeping standards will be difficult to achieve.

The language of the code appears to be understandable. Some explanation of the terms "hierarchy" and "multidisciplinary" was necessary for some groups, but in general, the wording is excellent.

26. Is this being done to comply with the law?
27. This code is meaningless unless responsibility and accountability is specific.

Some areas of the code need clarification.

Involvement by all employees may be slow.

Some minor semantic issues should be addressed.

Alternative Code Language -- The code should address company liability, staffing, and training. Simplify the language and add examples that plant employees can relate to.

28. Management practices - page 2 item 6 - "determine trends." What sort of trends? Physical or chemical agent exposures? Fume releases? Accidents and injuries? May want more detail given (examples).

- 29.A. Get the involvement of the "guys in the trenches." This has worked well with safety and quality - why not with Responsible Care®? We'll need to be more stringent to require rotation on a timed basis. Rotate every six months for new input.

Make it real. Not just lip service to make us all feel better about how we relate to the code. Don't let it die from neglect five years from now. Too often, our programs of this type become either trying or burial grounds for personnel moves. Let's define our intent and go for it.

Not enough information (on the code) for a good understanding. After reading and discussing, it is still vague.

Your questions are very vague as to what you're inquiring about.

Make the code more specific.

Put it (the code) in more simple terms.

- B. Self evaluation process can lead to variation in scoring by different companies. (Scoring depends upon interpretation of management practice language and on how good a company wants to look.) Evaluation process could include random checks by an independent auditor.

We should continue publicizing Responsible Care® to our employees.

This Code (and others) presumably go beyond what is required by law. The purpose statement could acknowledge this fact.

Little mention of communicating EH&S issues to those groups other than employees (media, customer, non-member CMA companies, etc.). This is covered in the CAER Code, however.

No mention of coordination/communication with outside agencies regarding EH&S matters; i.e., Hospital, Fire Department, Department of Public Health & Safety, etc.

No mention in the management practice for protecting visitor health and safety. (Include in MP#3?)

Alternative Code Language Suggestions:

- MP#1: "...including qualified and certified health and safety personnel."

"...or other work site conditions. Job safety and health analysis to include mitigation recommendations."{sic}
- MP#13: "... facilities, tools and equipment. Routine inspections by qualified personnel to be included in these programs."{sic}
- MP#18: "On-the-job and off-the-job health and safety training programs..."

30. Workers fear losing their jobs or having all the hard work unfairly fall on those determined to be "fit" based on Health Assessments called for in the Code.

Concern that this is another "paper monster" that won't have real management support.

Code should contain some enforcement provisions through independent audit.

Guidelines needed for uniform implementation.

31. Shows same redundancy as other Sections in Code.

Medical surveillance/hazard reviews important for assuring health and safety.

Wellness should be emphasized more.

The code is a management propaganda tool.

The code is general and specific workplace feedback is more important than designing codes.

Employee education and awareness, as well as keeping the code highly visible, will be critical to its success.

Several people were curious about follow-up and enforcement once the code is implemented.

32. Although not necessarily negative, there were comments as to concern that programs are not "just in writing" but carried out; therefore, "systems to verify" was viewed as important.

Many expressed that there was not enough detail in the Code. When the resource document was explained, this concern lessened.

Some expressed the need for more thorough attention to contractor issues.

One or two expressed that the Responsible Care® effort "sounds like advertising how good you are" and that it is just "more paperwork." More often the response was that it is positive that the industry is setting high goals, and that informing the public and the public's perception are very important issues.

33. Overall language was too vague; more specific guidance should be provided. (AMOCO)

Simplify language and provide a glossary to define terms and concepts. (Contractors)

CMA should have internal audits of member companies at the time of self-evaluations; a CMA sponsored "Compliance Review"; survey plant employees at self-evaluation time and have responses compiled by an outside agency (other than CMA); CMA needs "outside eyes" for R.C. evaluations. (AMOCO and Contractors)

Item 17 - Communicate all process hazards, not just specific tasks or immediate work area; give people the "big picture"; need to know what people down the line are doing; communicate what Contractors are doing and the chemicals they are using. (AMOCO and Contractors)

Items 9 & 10 - More emphasis on Wellness programs and wellness/health education - Wording suggestion: Provide opportunities for employees to participate in structured wellness programs. (AMOCO)

Item 2 - Institute an "Opportunity for Improvement" system to improve employee involvement and as an on-going mechanism to improve the Health and Safety Code implementation. (AMOCO)

Solicit comments from activist groups outside the Chemical Industry. (AMOCO and Contractors)

Item 3 - Ask Contract employees to participate in new Health and Safety initiatives; request input on operating

procedures; involve contract employees in site safety inspections; more interaction between contractors and company employees on Health and Safety issues. (Contractors)

CMA should sponsor seminars to inform smaller companies about Responsible Care®; be willing to share Health and Safety information and employee involvement practices with smaller companies. (Contractors)

Responsible Care® communication has been poor; CMA should get television air time and advertise this effort. (Contractors)

CMA should sponsor a "Responsible Supplier" or "Responsible Producer" program for those chemical companies that participate in the Responsible Care® program. Those companies only should be allowed to advertise with the Responsible Care® logo so the general public can appreciate who they are dealing with. (AMOCO)

- 35.A. Concern at working level about code being only a "guideline" rather than a set of specific standards.

Wording should be easier to read.

Several areas that employees do not feel qualified to evaluate (e.g., occupational health program, etc.) which reinforces that employees know more about safety than about health issues.

Code provides basic list of programs required for use by management and employees, but does not provide innovative guidance to industry on creating involvement and helping employees feel empowered to participate (employee-led, employee developed processes).

- B. Concern about medical surveillance/investigatory evaluations since these are not well-defined in the industry and facility.

Manpower commitment/needs seem high to support.

36. "Vaguely worded, avoid phrases like 'Timely investigations and mechanisms for.'"

"Looks like it was written by a lawyer."

"Why do we need this code? Isn't this all covered by government regulation and/or standards?"

"More paper work, too many rules."

"It's all a public relations propaganda."

Code will be expensive and difficult to properly maintain."

#2 - Add "at all levels of management" after the word "employees".

#4 & #5 - Combine 4 & 5 into one.

#5 - Verification effort and measure of effectiveness will be tough

#8 - Exposure assessments should be administered on an on-going basis.

#9 - Should there be a drug screening statement?

#12 - Add the word "tested" after the word "selected", i.e., gloves should be tested before working with suspected carcinogens.

#15 - Add the words "unauthorized removal chemicals from the work site". {sic}

#16 - Should include assistance from on site medical personnel.

#18 - Should include accident prevention program. Need to state frequency (annually).

Under member self evaluation, several people asked why Stage I - "No action" should be allowed.

37. Code language is difficult to understand for industrial employees. Change legal wording so we can understand it.

Code should include off the job Health & Safety awareness or promotions (i.e., seat belt safety program, fire prevention, personal health, etc.).

Could be more specific and less general. State goals of each section of code.

Code needs to address health issues.

Code is more geared for management. Employee involvement is vague.

Many practices are repetitive (i.e., 12, 13, 14).

38. Program Mgmt. 1) "What does "Qualified" mean?" 2) "How can you guarantee we participate?" 3) "We need a lot of work with contractors."

Id. & Eval. - #9 and #10 - "As a union, we don't like medical exams. They could disqualify me." "I've worked here for xx years, and now a doctor is going to tell me I can't work?"

#16 - Change wording to "Personnel available at site during any work operation trained in CPR/First Aid. If professional medical help is not accessible in 7 minutes, then also include M.D. or P.A. at site."

#17 - "What are some examples?"

#9 and #10 will be fought by union (medical surveillance, etc.)

39. Employees should be provided with more opportunities to participate in their site's program development. Need to use team work or Total Quality Management or Continuous Improvement concepts to create a proper program. Follow through to ensure solutions are optimum and require modifications to keep pace with change. Need to make comment that everyone needs to know their job well in order to provide the plant and their employees with the proper protection.

41. There were no negative comments. There were areas of concern:

Employee participation is very important and will require some "up-front" communication. However, the key (to maintaining participation) will be results (a safer, healthier environment).

Questioned the ability of "smaller" companies to comply (medical surveillance programs, record systems and analysis, etc.).

42. How will the CMA Code group police each member in following the Code? Will we use catastrophic events to benchmark ourselves?

Does it respond to our employees? (Employee feels it is responding to the public.)

Many changes are being made with regard to safety. Employee does not think these changes are being communicated to the entire work force. Employee feels that 80% of our employees do not move around the plant much (job duty wise) and hence, don't know we are doing these things unless we communicate them.

Are resources in place to implement as per timetable?

Community is asking for more (information) than employee feels is required.

- 43.A. More communication is needed on Responsible Care® at the plant level.

Health assessments to determine employee medical fitness for specific job task is an area of concern. The Code should better clarify the intent of this element.

Practices which emphasize increased preventative activities should have higher priority than other practices.

There is no time line for compliance with the code or specific milestones to measure progress.

Implementation of the Code will require increased resources and commitment from management at all levels.

B. It is difficult to see how this can be implemented or the provisions enforced.

Health assessments to determine employee medical fitness for specific job tasks is an area of concern. The Code should better clarify the intent of this element.

Better training materials are needed.

Implementation of the Code will require increased resources and commitment from management at all levels.

44. A concern for the potential lack of resources and personnel to fully implement the Code.

The word "quality" is not used.

Since contractors are included, consider "Worker" instead of "Employee" in the title of Code.

The Code is very general, and does not go into the specifics of how a good safety and health code would be carried out.

Some concepts in the Code are difficult to understand, and a suggestion that efforts should be made to simplify the language. {sic}

A mechanism to communicate to families and the public should be included in the Code.

The Code should cover more clearly the importance of training employees and neighbors regarding what chemicals are on-site and what possible hazards there are.

Suggests a mechanism for employees to evaluate safety equipment and work with manufacturers to improve equipment.

It seems to list all of the pertinent topics, but it does not explain how it will be carried out. For example, a plant might have some amount of all 18 items in the Code, but still have a very ineffective program.

How can an individual employee express concerns without fear of reprisals?

45. Not very interesting reading.

Difficult to apply some of the chemical concepts to our medical device business.

Too long - could have been condensed to some main points for most employees.

46. One topic (element) that doesn't seem to be covered under the Prevention and Control items is the establishment of control systems to restrict or preclude the access of workers to inherently hazardous processes or locations within a work site, such as confined spaces, electrical systems/equipment under repair, or unguarded "high hazard" areas (rooftops being a good example).

The only one that comes close is number 15. However, it appears to be oriented towards access INTO a site rather than WITHIN it.

15. Security procedures and systems to control unauthorized entry of personnel and materials into work sites.

I suggest that this element be expanded to cover the scope of such hazards rather than to add a new one. Access control systems within, as well as into, a work site are typically managed by the security function because of their 24 hour staffing and surveillance capabilities.

47. Code doesn't stand alone, altruistic - needs definition of code elements in realistic and achievable guidance terms.

Element #3 difficult to achieve, hard to manage. How to "select" contractors - needs clarification.

Clarity of wording - need definition/glossary or change in a number of areas as follows:

- In Purpose section, "multidisciplinary" vs disciplinary (perceived by two locations as related to staff discipline). Suggest wording such as: "using a variety of skills."
- Hierarchy of controls (not clear), use "inherently safe mechanical and process design." (Element not totally clear as to control action related to results from earlier code elements.)
- Policy vs procedure; (many procedures, few policies)
- What's a program, a system?
- Published vs written (published implies outside the company)

- Where do ergonomics/CTD's fit in?
- Question value of word "occupational"? (Delete or substitute "job-related?")
- "Employees" - Who's included? (e.g., contractors? visitors? vendors?)

Element #1 Qualified H&S personnel - is it needed? Does it suggest staffing structure? Perhaps revise to "including access to qualified H&S personnel."

Elements #6 and #10 What is to be done with data or info collected? Add "measuring" performance. Not clear - need to include some action developed on the basis of results.

Element #8 Use "Analysis of job safety" rather than JSA

Element #12 Include "training"; specify "Personnel" H&S equipment.

Element #13 Use "maintain equipment in a safe condition"

Element #14 Add 'identification of root cause"

Element #15 Delete "unauthorized" (was not clear why security in H&S code)

Element #17 Include visitors

Sounds like "paper" programs okay - but action requirements not clear from "Prevention and Control" section (i.e., lack of mitigation requirements were a recurring concern).

Element #9 Areas of significant concern re: meaning, impact on job security, do we mean annual physicals? Clearer statement of "real" goal: "We want to make sure people don't get hurt by asking them to do jobs for which they are not physically fit." What about those disqualified? Are drug and substance abuse included? Does it require written physical requirements for each job?

Element #7 - Should design for maintenance of facility as well - (See some overlap with #8)

Element #1 Add concept that line people need knowledge to implement H&S responsibilities.

Element #2 Need to specify "formal" opportunity for employee participation.

Concept of continuing improvement? (Is it always true if performance good, or best in industry?)

Resource Manual - Will it be explicit enough to help us judge whether we are meeting the requirements?

49. "Code needs checks and balances to keep us honest and put safety first....." (union employee)

The wording should be stronger in the communication and training management practices.

More emphasis on training and communication.

Code should be flexible, emphasize continuous updating as conditions warrant.

Most of the management practices require one of the following: systems, procedures, opportunities, means, provisions, programs, mechanisms, etc.. Companies can have all these on paper; the important point to make is that they are followed, used, implemented, evaluated. We need an action code, not one that stresses written policies.

50. More training would be beneficial and involve family members occasionally.

This code will have only limited affects at this site because most of it is already in place.

The code should be made easier to understand.

More people need to be made aware of CMA.

51. Employees were skeptical as to whether every member of the Chemical Manufacturers Association would live up to each of the code practices.

Concern was expressed that most of the practices were geared more toward management and that employees would have to be more involved for significant improvements in health and safety to occur.

Several comments were stated that not enough information reaches employees. Employee participation in policy formulation has not been solicited enough.

Some participants questioned whether evaluations would be made measuring management and employee compliance with the code practices.

Additional comments from health/safety and legal staff:

Practice No. 7: Change to "...evaluate actual and potential occupational health and safety hazards..."

Practice No. 9: The Americans with Disabilities Act will affect implementation of this code. CMA guidance may prove useful.

Practice No. 15: Change to "...into worksites including work and entry permit systems."

52. Improve the presentation of the Code; make it interesting to the average person.

The Code should include provisions for employee accountability.

The Code lacks detailed guidance on how to achieve its goals.

The Code is too vague; too general. Compliance with the Code has a too wide a range to be meaningful.

The Code reads as a suggestion, rather than a directive. Stronger language should be used.

Suggested Alternative language:

Use "procedure" vs. "practice". Procedure spells out exactly how things should be done.

Practice as used here really means policy. Use simple terms with obvious definitions so that everyone interprets the language to mean exactly the same thing.

Use less formal terminology; consider the audience and use more appropriate language.

Use active statements, focusing on verbs.

53. Employees felt that the code looked good on paper but expressed concerns about its implementation.

Evaluation of the code practices should not be limited to management, but should involve hourly employees.

Without open communication between management and the workforce, the code would be ineffective.

Employees suggested that CMA certify compliance with health and safety code.

54. Too repetitious with the ideas.

There are not enough people to facilitate and document the programs.

Program is meaningless unless there is feedback to employees involved with the implementation.

The code is too extensive; health and safety should be split into separate codes.

Terminology of the code needs to be simplified.

The code should include a means to verify that health and safety practices are in compliance with all regulations.

55. Management should keep reaffirming that under all conditions safety, health and the environment are the prime considerations.

We should place more emphasis on contractor safety. Possibly KM people should hold the safety meetings.

We need redundant training on hazardous chemicals.

EXAMPLE: Training upon entry to the work force with additional training every three months for the first year.

More information about the CMA is needed. Many of our people were unfamiliar with it.

An open house by the advisory committee is suggested to help acquaint the community with the CMA and its purpose.

57. Plant employees felt that communication could be improved between themselves and upper management.

Employees wanted to be provided additional lead-time regarding the proper handling procedures on new, and potentially dangerous products.

Employees stated that security was sufficient during the week, but recommend some type of weekend/holiday surveillance.

Employees felt that equipment currently used is adequate, and well maintained, but recommend consideration be given to more advanced technology.

58. Code is hard to read.

Code is not very specific.

Code appears to be for external public relations.

Employees do not have the opportunity to participate in the development and review of health and safety programs.

Code is good, but will await industry actions to show commitment.

59. "Addresses little, if any, with employee involvement."

"Like most 'general' practices, they are inclined to be so general that sometimes they do not seem to apply to your specific industry."

"Be more specific." "Codes appear as a series of one-liners, as opposed to breaking down problems into major subject areas with sub-topics."

Note: Assume this will be done in the expected implementation manual.

Code does not identify "any specific quantifiable goals."

Code "does not address relativity of other considerations, e.g., needs, alternatives, economics, etc."

60. Element 1 - Comment: Contractors need to keep plant worksite clean while they are working and not delay site clean-up until the job is totally completed.

Element 2 - Comment: There needs to be a mechanism so employees can go to their foreman to resolve safety issues - and so employees can have input toward changing safety programs. Such input should be encouraged by management.

Element 3 - Comment: Company should require a copy of the contractor's OSHA log and should require submission by contractors of their safety programs when they bid for work.

Element 4 - Comment: There should be a form employees can use to submit ideas/issues about safety.

Elements 5 & 6 - Comment: These were seen as being the same and could be combined.

Element 8 - Comment: Safety assessments need to look at ergonomics as well as areas listed. Also plant design needs to be done in a "user friendly" way, i.e., not locating valves at floor level or beyond the reach of employees.

Element 9 - Comment: Health assessments are too broadly stated and may result in management/union controversies.

Element 11 - Comment: "Material substitution" needs to be defined. It is not clear what is meant.

Element 13 - (and elsewhere as appropriate) -
Comment: Purchasing needs to be listed. Purchasing should be an active participant in implementing this code and implementing safety programs (i.e., buying tools and equipment on the basis of safety, quality, durability rather than lowest cost alone).

General Comments about the Code and CMA Responsible Care®

17. CMA should consider including hourly employee input on all Codes, not just the Employee Health and Safety Code. If we all are to become ambassadors for safety, health and environmental practices for our industry, then all levels of employees should have input into the Codes.

The Resource Guide information to be developed should be shared and made available to all personnel at all member company locations, including contractors.

CMA should develop an "Experience" sharing service to small companies and others to provide realistic ideas on how to achieve the requirements of the various Codes. Industry needs to help one another improve, as well as improve their own performance. The Codes should be expanded to the rest of the world.

Each company should feel free to go beyond the Code requirements if so desired. Excellence is a constantly moving target.

47. PAP - what about "ordinary" folks? Employees interviewed did not perceive the PAP as having such participation (one location).