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TO: Dave Penney

FROM: T. G. Grumbles
DATE: October 8, 1991

VISTA

Interoffice
Communication

SUBJ: LATEST DRAFT OF PRODUCT STEWARDSHIP CODE

Attached is the latest draft of the subject code. Timing on final approval and our first self-evaluation due dates are still unclear but are anticipated in the spring.

I still need your thoughts on how we might evaluate our activities versus the code elements.



T. G. Grumbles

cb

cc: J. Roheim

Penney, 305

VVV 000007951

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Product Stewardship Code (Draft 8/21/91), Page 1

Product Stewardship Code of Management Practices

PURPOSE AND SCOPE

The purpose of the Product Stewardship Code of Management Practices is to make safety, health and environmental protection an integral part of designing, manufacturing, distributing, using, recycling and disposing our products. The code provides guidance as well as a means to measure continuous improvement in the practice of product stewardship.

While the scope of the code covers all stages of a product's life, successful implementation is a shared responsibility. Everyone involved in these activities has responsibilities to address society's interest in a healthy environment and in products that can be used safely. All employers are responsible for providing a safe workplace and all who use and handle products must follow safe and environmentally sound practices.

The code recognizes that each company must exercise independent judgment and discretion to successfully apply the code to its individual business environment and customer's needs.

RELATIONSHIP TO RESPONSIBLE CARE AND GUIDING PRINCIPLES

Implementation of the code promotes achievement of several of the Responsible Care® Guiding Principles:

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

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9. **CONTRACT MANUFACTURERS:** Select contract manufacturers who employ appropriate practices for health, safety and environmental protection to the operations under contract; or, work with contract manufacturers to help them implement such practices. Provide information and guidance appropriate to the product and process risk to foster proper handling, use, recycling and disposal. Periodically review performance of contract manufacturers.
10. **SUPPLIERS:** Require suppliers to provide appropriate health, safety and environmental information and guidance on their products. Factor adherence to sound health, safety and environmental principles, such as those contained in Responsible Care®, into procurement practices.
11. **DISTRIBUTORS:** Provide information to distributors and, commensurate with product risk, work with them to foster proper use, handling, recycling and disposal, as well as facilitate the transmittal of information to downstream users. When a company discovers improper practices involving a product, it should take corrective measures. As one option, a company may decide to cease doing business with those who are unwilling to implement these measures.
12. **CUSTOMERS AND OTHER DIRECT PRODUCT RECEIVERS:** Provide information to direct product receivers and, commensurate with product risk, work with them to foster proper use, handling, recycling and disposal, as well as to facilitate the transmittal of information to downstream users. When a company discovers improper practices involving a product, it should take corrective measures. As one option, a company may decide to cease doing business with those who are unwilling to implement these measures.

MEMBER SELF-EVALUATION

RELATIONSHIP TO OTHER CODES OF MANAGEMENT PRACTICES

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