



Fecc Guide with Good Practices for Chemical Distributors Product Stewardship

Introduction

Fecc, in cooperation with Cefic, have revised the guidelines on Product Stewardship. In this guide Fecc tries to make clear what should be the responsibilities and tasks of the manufacturer and what should be the responsibilities and tasks of the distributor. In addition to this guideline Fecc has tried to give good examples of Product Stewardship together with good practices. The goal is to make these Product Stewardship guidelines with examples more clearly and also to improve the application of Product Stewardship throughout the whole life cycle of chemical products.

This guide with good practices follows the design of the guidelines on Product Stewardship and is not only intended for distributors with storage facilities but also for all type of chemical distributors and for small manufacturers of chemicals.

In particular this guide provides advice on:

- Selling the chemical
- Substance registration
- Classification, labelling and packaging, for supply and transport
- Handling, Storage and Transport
- Safety Data Sheets
- Product Development / Use
- Product Defects
- Chemical and Packaging Disposal
- Product Dossier and Database
- Incident/accident management

More information on www.fecc.org

Disclaimer:

Each supplier or distributor should apply these guidelines under their own responsibility and in accordance with their own operational requirements. No part of these guidelines may be used or interpreted in a way which would conflict with existing international, EU or national law, including competition law. In any case, applicable regulatory and legal provisions will always take precedence over any part of these guidelines.

Selling the Chemical

- Regularly check if the chemical product you are selling is mentioned on one of the lists of Chemicals subject to additional laws and regulations related to the trade of the chemicals. Specifically, legislation on:
 - Drugs precursors
 - Chemical Weapons Convention
 - Prior Informed Consent (PIC regulation)
 - Explosive precursors
 - Intermediates (REACH)

Try to get a list by CAS number where you can see an overview of the applicable legislation for a listed chemical. Be informed on the usage advised by the suppliers to verify the conformity, inform the customer on the authorized use(s) and get his written confirmation according to legislation.

- Inform the customer prior to selling, eg. via the “general conditions of sales”, the local sales contract or other ways, that when REACH exposure scenarios are described in the SDS, chemical products should be used accordingly.
- Often sector groups of Cefic write industry codes and good practice guides for commonly used chemicals or groups of chemicals. Fecc tries to collect these papers and will publish them on their Product Stewardship part of their website. Let an expert in your company read these guides and check first if you are in compliance with these guides. In addition it is good Product Stewardship if you communicate these guides to your customers and also help customers to be in compliance with these codes of practice.
- Manufacturers of chemicals worldwide are at this moment submitting under GPS (Global Product Strategy) chemical safety summaries. Regularly check the website: www.icca-chem.org/Home/ICCA-initiatives/Global-product-strategy/ if there is already a report for your chemicals. You can of course communicate these reports to your customers.

Substance Registration

- Ensure that you have (pre)registered all substances that you import as such or as components in mixtures unless they are exempt or an OR has been appointed by the manufacturer for this purpose
- Also, ensure that all hazardous substances and all substances subject to REACH that you import are notified to ECHA according to CLP within one month of first importation. If you have doubt you can check this at: <http://echa.europa.eu/web/guest/information-on-chemicals/cl-inventory>
- Ensure that products for some applications (not covered by REACH, but covered by other local/EU-legislations) are duly registered to the relevant authorities and/or comply with relevant legislation (Biocide, Food, Feed, Pharmaceuticals, etc.)
- There is a duty to send information to local (national) poison centres. Get in contact with your national (or local) poison centre and ask them how you can fulfil your duties. In general this concerns hazardous mixtures.

Classification, Labelling and Packaging, for Supply and Transport

- Ensure that chemicals in your warehouse are correctly classified, labelled and packed. Check that the label on the packaging corresponds to what is reported on the SDS.

- Most of your customers might not be familiar with CLP or transport regulations. It is a good practice to help your customer to apply new legislation for example by giving training to your own salespeople to help customers with compliance.
- If the CLP or transport information changes further up in your supply chain inform your customers. Not only by forwarding the new relevant SDS but by a more specific memo/letter on the changes.
- If you label chemical products yourself be sure that you send product to your customers provided with a label in the language of the customer. It is wise to use Multi-language labels, but be sure that the text on the packaging is still readable.

Handling, Storage and Transport Substance

- Carefully read the SDS and available industry codes on these issues.
 - Most countries have specific legislation on the storage of chemicals. Often certification of the storage site is necessary. Ensure that your storage, or the storage facilities of a logistics partner, are in compliance with the legislation. You can use for example SQAS assessments to assess your logistic partner.
 - It is recommended to use SQAS Logistics assessed partners.
 - Train your operators on handling, storage and transport of the chemical products you handle. Repeat this training regularly to keep your operators updated.
 - Check also for hazardous chemicals, especially delivered in bulk, if your customers are applying the standard safety measures for unloading of chemicals. Cefic has best practice guidelines on these subject:
 - Guidelines for Transport Equipment used for Chemical Packed Cargo
 - Guidelines for the security of the transport of dangerous goods by road
 - Behaviour Based Safety Safe Loading & Unloading
 - Guidance on risks and precautions to be considered for bulk liquid loading and unloading operations in road transport
- Additionally, the distributor trade organisation in your country and/or your supplier may have their own best practice on this subject.
- Provide information to the drivers about the safety situation at the customer's premises
 - Site (Un)Loading Information Document (SULID)
 - Avoid direct filling of packaging (IBC) directly from a tank truck at the customer's premises or your own premises.

Security

- The RC Security Code should be adopted
- A Security Plan should be implemented
- Know your customer and your Logistic Partners
- Train your employees in security aspects

Safety Data Sheet*

- Keep records of the relevant SDS you send to your customers, to external warehouses (if applicable) and to any other subcontractors that might work with your products.

- The best way is to have an automatic system coupled to your sales system that sends latest SDS. There are IT companies that can help you with this.
- Be sure that the phone number of the poison centre is correct for the area where you deliver the product.
- In section 1 there should be an emergency phone number (not the phone number of the poison centre). Ensure that this emergency line is staffed 24/7 - you can do this by making use of a professional emergency call centre supplied with up to date SDS. Also have a contract with a remediation/ salvage company that can help you clean up spills at public roads, your own premises and customer premises.
- Check the SDS of your suppliers if the correct use categories are mentioned and communicate deviations up the supply chain.

**SDS includes SDS and Extended SDS where required*

Product Development / Use

- Communicate up and down the supply chain on new chemical product developments and give (technical) support on this subject to customers and also to your supplier
- Check if new uses of chemical products are in line with the uses on the SDS. Be prompt with communication to your supplier with any new uses so that these can be supported by an exposure scenario if required.
- Check the extended Safety Data Sheet (e-SDS) and any Exposure Scenarios from the manufacturer on the uses of the product where applicable. If the chemical is classified as hazardous and your uses, or the uses of your customers, are not covered inform the manufacturer as soon as possible.
- Check, and respect, the uses advised against.
- Ensure that you implement the operational conditions and risk management measures described in the exposure scenarios.
- Take the appropriate measures to ensure that your customer implements the operational conditions and risk management measures described in the exposure scenarios (written confirmation or visit your customer). **KNOW YOUR CUSTOMER.**

Product Defects

- Have in place a good complaints management system and organise the follow up of complaints.
 - Set objectives (KPIs) on complaints response time, etc.
 - Communicate internally
- Have in place a traceability system so that product recalls are easy to organize.
- Communicate customer complaints and product defects to your supplier.

Chemical and Packaging Disposal

- Have a waste management system in place.
- Some specialized companies use a (closed) loop system for a safer responsible handling for certain chemical products like solvents.
- Have a return system for drums and IBCs in place, including sealing system, cleaning and reuse of the packaging.
- For one-way packages give advice on disposal to the customer.

Product Dossier and Database

- Keep a separate product dossier for every chemical product with SDS, technical information including information on the packing types, storage and disposal.
- Collect the main properties of your chemical products in a database to make it easier to react to changes in legislation and to make useful queries for sales, suppliers and customers

Training and Education

We also want to emphasize the importance of training and education for your own employees and contractors but also for customers. Issues connected to product stewardship should be part of your training and education program. Think about the following things:

- General Safety and Environmental awareness
- Security awareness
- New employees
- Your own Sales people
- Back office (especially on trade issues)
- Use different kinds of methods like videos, presentations, group discussions and e-learning.
- Develop tests to make sure that your employees master the subject
- Have refresher courses on the different subjects
- Give information about the health and safety effects of the products
- Use best practices in your education
- Ask for feedback from your employees and/or customers
- Take specific care on drivers' training on specific chemical products
- Make information available in the language of the driver for instance, use Transperanto.
(www.transperanto.org)

Incidents and Accidents

- Incidents and accidents are a very important opportunity to learn and improve inside your company,
- Have an incident reporting system in place including lessons learned
- Have a near miss reporting system in place
- Sharing your incident analyses can save lives
- Share selected incident analyses with your supplier and with your distributor trade organisation

What we do?

Responsible Care[®] helps the industry to operate safely, profitably and with care for future generations. Through the sharing of information and a rigorous system of checklists, performance indicators and verification procedures, **Responsible Care**[®] enables the industry to demonstrate how its health, safety and environmental performance has improved over the years, and to develop policies for further improvement.

Responsible Care[®] requires companies to be open and transparent with their stakeholders – from local communities to environmental lobby groups, from local authorities and government to the media, and of course the general public. It has driven a transformation in the way that companies operate: from being secretive and defensive about their activities, to being more open, honest, and actively seeking dialogue and partnerships with stakeholders.

The initiative is intentionally flexible in order to transcend differences in culture, national legislation, and so on, thereby enabling all chemical associations and their member companies – wherever they are in the world – to adopt Responsible Care and adapt it to suit their situation.

Nevertheless, there is a common set of Fundamental Features that all associations must adhere to, ensuring the initiative remains true to its core ethic.

Responsible Care[®] is the world's leading voluntary industry initiative - it is run in 60 countries whose combined chemical industries account for nearly 90% of global chemicals production.

The logo for FECC (European Association of Chemical Distributors) features the letters 'Fecc' in a bold, blue, sans-serif font. The 'F' is significantly larger and more prominent than the other letters. A thick blue horizontal bar is positioned above the 'e' and 'c'.

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