

Code of Practice  
**DISTRIBUTION**



---

**Guidelines for the Implementation of the Management Practices**

**1. INTRODUCTION**

**Definition**

The Distribution Code governs member companies' management commitment and actions taken to ensure preservation of the environment, protection of the health and safety of employees as well as the community during the handling, storage and transport of chemicals.

The implementation of this Code is a demonstrable process involving setting continuous improvement plans and objectives, carrying out hazard evaluations, implementing risk reduction programmes as well as having a prompt and effective emergency response plan.

This Code covers all operations that chemicals undergo before and after manufacture and before ultimate use. Storage under this Code covers both bulk and packaged chemicals and includes the handling, re-packing, care, custody and pipeline transfer of chemicals. Transport covers all aspects of transportation of chemical raw materials and chemical products, including wastes, by all alternate modes, including road, rail, air and sea freight. This Code covers all facilities and services whether owned or operated by, or contracted to, the member company.

This Code interfaces with a number of the other Responsible Care Codes of Practice, in particular Product Stewardship, Process Safety and Employee Health and Safety.

## Annual Self-Evaluation Form

Member companies recognise the risks involved in the storage and transport of chemicals, and through this Code, aim to achieve:

- Progressive improvement in health and safety and reduction of incidents which can result in injury to people and to the environment during the storage and transport activities;
- Effective emergency response which minimises harm to people and damage to the environment;
- Assurance that the management systems necessary for responsible storage and transport activities are in place and are functioning effectively;
- Cooperation with the storage and transport industry in reducing risks associated with their operations;
- Public, employee and contractor confidence in the storage and transport of chemicals and chemical products.

Chemicals and chemical products will not be presented for storage and transport unless they are:

- Suitably and securely packaged to safely withstand the rigours of handling;
- Labelled to advise employees, transporters, emergency services and consignees of all of the hazards that may be present during storage and transport;
- Are properly described in consignment documentation to enable the storage and transport functions to be carried out safely.

Each member company will also work actively, alone or through selected organisations, and if possible, in consultation with other stakeholders, to assist government agencies in developing public policies, legislation and regulations governing the storage and transport of chemicals.

Many companies have quality, environment and safety systems such as ISO 9001 and ISO 14001. Implementing equivalent elements from those systems would meet the requirements of this Code of Practice. Where a company does not have a recognised management system, the examples for this Code of Practice provide guidance for sound Distribution management practices. Implementation of a management system equivalent to the examples given with appropriate evidence of actions will provide acceptable compliance with the Code of Practice.

### **Explanatory Note (how to use the Part 2 and filling blanks in the last 2 columns of the Table):**

This Annual Self-Evaluation Form consists of the followings:

- Part 1 of “INTRODUCTION”, and
- Part 2 of “SELF-EVALUATION FORM” that consists 10 management practices for the Distribution Code.

## Annual Self-Evaluation Form

In part 2, the description of each management practice is in the first column of the Table “MANAGEMENT PRACTICE” and its sub-clauses are in the second column “GUIDELINES FOR IMPLEMENTATION”.

The applicability of the Management Practice to the various categories, i.e. Manufacturer (M), Logistics & Service Providers (LSP) and Trader (T), are indicated above the Management Practice title.

The column “Status” is the result of the evaluation. Company needs to put a tick in the boxes under the “Status” column to indicate if they have met the requirement of the guidelines of implementation, i.e. Yes, No, NA.

The following example illustrates evaluation and filling the result of evaluation:

*After evaluating a management practice (or its sub-clause), the Company concluded it met all the necessary requirements described in the “Guidelines for Implementation”, the Company should put a tick in the box under the ‘Yes’ column and indicate clearly the index where evidence can be found. On the contrary, if the Company concluded it did not meet the requirements described in the “Guidelines for Implementation”, the Company should put a tick in the box under the ‘No’ column. In the event that the Company does not fall into the category that are applicable for the management practice, the Company should put a tick in the box under the ‘NA’ column.*

Companies shall evaluate in an objective manner if the current practices meet the intent of the clause; in a manner appropriate to the size, complexity and risk of the business.

The annual self-evaluation submission is used by the Country Association (SCIC) to assess progress of Responsible Care implementation and awarding the SCIC Responsible Care Awards. Company is required to attach documents to substantiate and justify their results of evaluation. In view of the large volume of documents likely to be attached with this Annual Self-Evaluation Form, documents should be neatly filed with clear document indexes in one of more hard-paper files for easy referencing. Document indexes pointing evidences should be written in the blanks of the “Document Index” column of the Table to complete the submission. The completed Annual Self-Evaluation Form with all attached documents should be sent to SCIC as a complete set of the annual submission.

# Annual Self-Evaluation Form

## 2. SELF-EVALUATION FORM

Management Practice	Guidelines for Implementation	Status			Evidence/Remarks
		YES	NO	NA	
<b>Applicability - LSP/M/T</b>  <b>1. Distribution Risk Management</b>  Regular evaluations of chemical distribution risks which consider the hazards of the material and the likelihood of incidents from release of the material over the route of transport, and implementation of chemical distribution risk reduction measures appropriate to the risk level.  <i>* Note: With reference to previous MPs 1 &amp; 2</i>	1.1 Has the risk evaluation been regularly carried out for chemical distribution?				Get a RA matrix/table to show all the chemicals and also the last review + next review date
	1.2 Has the evaluation covered all chemicals in distribution?				Show RA matrix to cover all chemicals + check if chapter 3 still valid, check if still want to include Stolt
	1.3 Are the risks and mitigating steps on chemical hazards documented?				Get RA for LTH transport to site - shows route of tpt Do we also include direct deliveries? How abt Stolt?
	1.4 Are the risk and mitigating steps on impact to human and the environment documented?				
	1.5 Is there clear documentation on proper container selection and design?				
	1.6 Is there clear documentation on study of mode of transport?				
	1.7 Is there clear documentation on route selection?				
	1.8 Is there clear documentation on operating procedures and practices?				
	1.9 Is there clear documentation on emergency response procedures?				
<b>Applicability - LSP/M/T</b>  <b>2. Incident reporting and management</b>  Internal reporting and investigation of chemical distribution incidents, and implementation of preventive measures.  <i>* Note: With reference to previous MP 3</i>	2.1 Is there a system maintained by the company for the reporting of any incidents and near misses during storage and transportation, with actual practice?				
	2.2 Are there contract arrangements, or equivalent, which require the reporting of significant incidents by vendors/contractors?				
	2.3 Are there records for the past 3 years that demonstrate all storage and transport incidents are promptly investigated by the company, both directly and, where appropriate, in consultation with the contractor?				
	2.4 Are there documented corrective and preventive actions following analysis of the incidents?				

## Annual Self-Evaluation Form

Management Practice	Guidelines for Implementation	Status			Evidence/Remarks
		YES	NO	NA	
	2.5 Are there planned actions specifying clear responsibilities and timing, with provision for documented follow-up?				
<b>Applicability - LSP/M/T</b>  <b>3. Laws and regulations</b>  A process for monitoring changes and interpretations of new and existing regulations and industry standards for their applicability to the company's chemical distribution activities, and for implementing these regulations and standards.  <i>* Note: With reference to previous MP 4</i>	3.1 Are there formal systems regularly maintained for identifying and keeping up to date on legal requirements with particular emphasis on Dangerous Goods?				
	3.2 Are company representatives participating actively in industry and technical forums to keep up-to-date on best practices of applicable regulations and standards?				
<b>Applicability - LSP/M/T</b>  <b>4. Training</b>  Ongoing training e.g. applicable regulations and company requirements, proper unloading and storage  Third party includes contractors, logistic service providers, distributors and customers.  <i>* Note: With reference to previous MPs 5, 6, 14</i>	4.1 Do you have training plans and records for employees involved in distribution activities?				
	4.2 Do you have training plans and records for third-party involved in distribution activities?				
	4.3 Is particular emphasis placed on legal and best practice requirements for Dangerous Goods and Hazardous Substances?				

## Annual Self-Evaluation Form

Management Practice	Guidelines for Implementation	Status			Evidence/Remarks
		YES	NO	NA	
<b>Applicability - LSP/M/T</b>  <b>5. Performance Review</b>  Regular reviews, with suitable performance indicators of company employee, carrier, distributor and contractor compliance with applicable regulations and company requirements. <i>*Note: With reference to previous MP 7</i>	5.1 Are the HSE related Key Performance Indicators (KPIs) for regular review of compliance, training and target audience identified and monitored?				
<b>Applicability – LSP/M/T</b>  <b>6. Logistic Service Provider Selection and review</b>  A process for selection of logistic service providers offering transportation, storage and handling activities with emphasis on safety and regulatory compliance. Review process includes providing feedback and suggestions for improvement  <i>**Applicable to LSP in the case of sub-contracting.</i>	6.1 Are documented criteria used to select and approve storage of chemical and logistics service providers?				
	6.2 Are there effective HSE policy and programmes?				
	6.3 Are there inspection and maintenance procedures?				
	6.4 Is there selection and training of operators/drivers, support staff and sub-contractors?				
	6.5 Is there a formal process established for monitoring trends in contractor HSE performance and implementation?				
	6.6 Is there a selection process for transporter and warehouse providers?				
	6.7 Are detailed audits carried out for contracted service providers with defined frequency based on risk level or performance?				
	6.8 Are there selection criteria which includes safety fitness and regulatory compliance?				

## Annual Self-Evaluation Form

Management Practice	Guidelines for Implementation	Status			Evidence/Remarks
		YES	NO	NA	
*Note: With reference to previous MP 8, 9, 15,16	6.9 Are the evaluation results/report provided to service providers as a form of feedback which include suggestions for improvement?				
<b>Applicability - LSP/M/T</b>  <b>7. Packaging Container selection and use</b>  Documented procedures for the selection and use of containers that are appropriate for the chemical being shipped, in compliance with testing and certification requirements, and free of leaks and visible defects.  Defined criteria for the cleaning and return of tank cars, tank trucks, marine vessels, and returnable/refillable bulk and semi-bulk containers, and proper disposal of cleaning residues or wastes  *Note: With reference to previous MP 10 and 13	7.1 Are the documented procedures in compliance to national or international standards, practices and legal requirements?				
	7.2 Are cleaning criteria defined with disposal procedures and records in place?				

## Annual Self-Evaluation Form

Management Practice	Guidelines for Implementation	Status			Evidence/Remarks
		YES	NO	NA	
<p><b>Applicability - LSP/M/T</b></p> <p><b>8. Loading and/or unloading</b></p> <p>Documented procedures for loading and/or unloading chemicals at company facilities that will reduce emissions to the environment, protect personnel and safe transportation.</p> <p><i>*Note: With reference to previous MP 11 and 12</i></p>	8.1 Are there procedures for loading and/or unloading chemicals in place and being used for about 3 years?				
<p><b>Applicability - LSP/M/T</b></p> <p><b>9. Emergency Response</b></p> <p>Documented Emergency Response Plan which includes responding to chemical distribution accident/incidents involving the company's chemicals.</p> <p>Documented procedures for making information about the company's chemicals in distribution available to emergency response agencies.</p> <p><i>*Note: With reference to previous MP 17, 18 and 19</i></p>	9.1 Is there an emergency response plan for handling on-site and off-site storage and transportation incidents, either directly or in cooperation with external parties, with regular drills?				
	9.2 Is the emergency response plan developed in consultation with employees, contractors, emergency response agencies and other stakeholders?				
	9.3 Are there clear documented procedures to provide up to date emergency information (eg. SDS, tremcards) and chemical inventory to emergency response agencies available?				
	9.4 Is there a programme for providing relevant training materials on distributed chemicals, including emergency response considerations emergency response agencies?				



## Annual Self-Evaluation Form

Management Practice	Guidelines for Implementation	Status			Evidence/Remarks
		YES	NO	NA	
	9.5 Do the training materials emphasize on incident management planning and organisation, up to crisis management?				
<b>Applicability - LSP/M/T</b>  <b>10. Engagement</b>  Engagement with authorities and public.  <i>*Note: With reference to previous MP 20 and 21</i>	10.1 Are there regular dialogue sessions with local emergency planning authority and organisations on the distribution and hazards of the company's chemicals to improve community preparedness to respond to chemical distribution emergencies?				
	10.2 Are there regular dialogue sessions with the public on their concerns about chemical distribution safety, actions taken by the industry and the company to improve the safety of chemical distribution, and the effectiveness of emergency preparedness and emergency response assistance?				