

POLLUTION PREVENTION CODE



The Responsible Care[®] signatory shall implement efficient pollution prevention measures to contribute to sustainability in the industry.

1.0 INTRODUCTION

This Code has been developed in support of the Responsible Care[®] Declaration as a commitment to actively strengthen Responsible Care[®] wherever signatories manufacture and sell products and/or services. The management system applied in this document is founded on the concept of Plan-Do-Check-Act (PDCA).

While pollution can be authorised by law through prescribed acceptable limits, Responsible Care[®] signatories should aim at continually improving by reducing the amount of pollutants released into the environment towards achieving sustainability excellence. Beyond legal compliance, leadership should enable the development and maintenance of pollution prevention programmes at all levels of the organisation.

Pollution prevention is a practice that aims to reduce, eliminate, or prevent pollution. The benefits of pollution prevention include:

- Resource efficiency (strengthening economic growth).
- Reduction in financial costs (waste management and clean-up).
- Reduction in environmental costs (environmental damage).
- Reduction in health risks.

2.0 SCOPE

The scope of this Code covers the chemical and allied industries' value chain including, but not limited to:

- Research & Development.
- Planning.
- Production.
- Storage.
- Distribution.
- Transportation.
- Usage.
- Waste Management (Handling, Treatment and Disposal).

The Pollution Prevention Programme shall cover, where relevant, air quality management, water quality management, soil quality management, ambient noise management and other identified priority pollution as defined by the legal requirements.

3.0 TERMS AND DEFINITIONS

This Code uses key terms in a context that may be broader than their associated regulatory definitions. However, adherence to this Code does not relieve a company of the obligation to meet national and local regulatory requirements.

3.1 Listed Activities

Those activities that are identified in environmental legislation by the Minister that could have a detrimental effect on the environment and requires authorisation, and/or registration, prior to commencement.

3.2 Pollution Prevention

A practice that aims to reduce, eliminate, or prevent pollution.

4.0 RELATIONSHIP TO RESPONSIBLE CARE[®] GUIDING PRINCIPLES

Implementation of this Code promotes achievement of the Responsible Care[®] Guiding Principles.

5.0 RELATIONSHIP TO OTHER CODES OF MANAGEMENT PRACTICE

This Code should be implemented in conjunction with other relevant Codes of Management Practice (CMP).

This Code currently interacts with nine other Responsible Care[®] CMP in many respects. It is not intended to duplicate requirements of the other codes and has therefore been written to cover only aspects not covered by the other Responsible Care[®] CMP.

The other nine CMP are:

1. Management Commitment
2. Process Safety
3. Product Stewardship
4. Stakeholder Engagement
5. Storage and Transportation
6. Resource Efficiency
7. Occupational Health and Safety
8. Emergency Response
9. Security

6.0 RELATIONSHIP TO AUDIT GUIDANCE DOCUMENT

This Code is supported by an Audit Guidance Document (AGD) which provides more detail on the implementation of this standard.

7.0 POLLUTION PREVENTION PROGRAMME: IMPLEMENTATION PROCESS

In terms of environmental legislation, certain activities have been identified as detrimental to the environment. These are referred to as listed activities which are required to be authorised by law. There are also unplanned occurrences that might result in pollution that need to be identified and reported on, if required. Responsibility to minimise and rectify the consequences of pollution caused by both authorised activities and unplanned occurrences remains with the signatories to the Responsible Care[®] Initiative.

7.1 Management Commitment

7.1.1 Leadership shall have a documented commitment to pollution prevention in a policy. This commitment shall be applicable to both listed activities and unplanned occurrences.

7.1.2 Adequate resources shall be made available to, as a minimum, meet legal requirements for

pollution prevention.

7.1.3 Leadership to implement continual improvement mechanisms towards pollution prevention.

7.1.4 Leadership shall enable the development and maintenance of pollution prevention programmes at all levels of the organisation.

7.1.5 Leadership shall provide opportunities for dialogue with relevant stakeholders regarding pollution prevention.

7.2 Compliance Obligations

7.2.1 Leadership shall ensure a system is in place to identify and update the legal requirements applicable to pollution prevention.

7.2.2 Leadership shall ensure mechanisms are in place to implement the applicable legal requirements.

7.3 Pollution Prevention Programme

The Responsible Care[®] signatory shall:

7.3.1 Identify the causes and potential causes of listed activities and unplanned occurrences that could result in pollution.

7.3.2 Identify objectives and targets as well as associated roles and responsibilities for the prioritised requirements, to support continual improvement mechanisms towards pollution prevention.

7.3.3 Ensure that the focus of preventative and corrective mitigation control measures need to be aligned to the identified causes.

7.3.4 Ensure effective implementation and maintenance of preventative and corrective mitigation control measures.

7.3.5 Ensure that when some of the control measures fail and pollution does occur, it is important to manage the event according to the legal requirements, report it within the organisation and pass on the learnings widely in order to prevent reoccurrence of pollution due to the same cause.

7.3.6 Communicate the requirements for the Pollution Prevention Programme at each relevant level of the organisation.

7.3.7 Ensure that training, monitoring and record keeping needs, at a minimum, meet the legal requirements.

7.4 Management Review and Continual Improvement

The facility shall have a regular and documented top management review of the Pollution Prevention Programme effectiveness, as well as implementation versus plan. Minutes of review meetings and corrective actions shall be documented and available.

DOCUMENT AMENDMENT HISTORY

| Rev | Date | Page | Description |
|------------|-------------|-------------|------------------------|
| 01 | June 2020 | All | New format and content |