

Annual Self-Evaluation Form

Code of Practice

**PRODUCT STEWARDSHIP**



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

**1. INTRODUCTION**

**Definition**

Product Stewardship is the responsible and ethical design and management of products throughout their entire product life cycle; in order to ensure health and safety and protect the environment.

The implementation of Product Stewardship is a demonstrable process that is an ongoing responsibility on a company to identify, monitor, manage and continually reduce the health, safety and environment risks of its products and packaging.

The purpose of product stewardship and of this Code is for a company to actively engage in the identification and management of the risks associated with its products, to the extent consistent with its degree of influence at each stage of the product life cycle. It covers member company actions necessary to fulfil the Guiding Principles of Responsible Care, including:

- to make health, safety and environmental considerations a priority in our planning for all existing and new products and processes;
- to develop and produce chemicals that can be manufactured, transported, used and disposed of safely;
- to extend knowledge by conducting or supported research on the health, safety and environmental effects of our products, processes and waste materials;

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- to counsel customers on the safe use, transportation and disposal of chemical products;
- to report promptly to officials, employees, customers and the public, information on chemical-related health or environmental hazards and to recommend protective measures;
- 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.

Society in general has a concern for the quality of the environment and an expectation that chemical products can be used safely. Manufacturers, suppliers, end-users (including the consumer) and companies recycling and disposing of products and packaging must address these expectations by assuming appropriate product stewardship responsibilities.

The purpose of Product Stewardship is that products, particularly those containing or creating hazardous substances, and the potential short or long-term health, safety and environmental risks which their use presents, be properly assessed and managed. This starts with the concept, and product development stage, then continues through their manufacturing, introduction and use (including recycling) and, if no practicable alternative exists, to final disposal. The Product Stewardship Code is also intended to help prevent misuse, mishandling or other activities that might result in harm to people or the environment, including the illicit production of drugs or chemical weapons. Each party in the supply chain owns responsibility for the product and will practise Product Stewardship. This requires the active co-operation of all participants. Importers are required to assume the same responsibilities as would apply to the manufacturer of the product. Any assessment of safety, health, environmental impact and waste management will not be over-ridden by commercial and technical considerations.

Each organisation and its management will maintain an ongoing commitment to understand better the risks involved with the products and communicate these to relevant staff, resellers and customers as part of their continuous improvement process. This commitment will include regular review and updating of information.

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 Product Stewardship 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.

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### 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 11 management practices for the Product Stewardship Code.

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 to what extent their 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.

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### 2. SELF-EVALUATION FORM

Management Practice	Guidelines for Implementation	Status			Evidence/Remarks
		YES	NO	NA	
<p><b>Applicability - LSP/M/T</b></p> <p><b>1. Leadership.</b></p> <p>Demonstrates company senior management leadership through written policy, planning, communication and provision of resources.</p>	<p>1.1 Has the company senior management endorsed a Product Stewardship (PDS) policy or a HSE policy which incorporates PDS?</p> <p><i>*Please provide a copy of the PDS/HSE policy. For HSE policy, please highlight the PDS elements.</i></p>				
	<p>1.2 Has the company senior management defined clear PDS goals at each stage of a product life cycle (as applicable), e.g. manufacturing (energy efficiency), end use (product safe handling training), no product regulatory non-compliances etc.</p> <p><i>* Note: With reference to previous MPs 2.1</i></p>				
	<p>1.3 Has the company senior management endorsed an annual PDS plan/program for all relevant stakeholders (internal and external) e.g. customers, distributors, employees etc.</p> <p><i>*Please provide a copy of the annual PDS plan/program for Singapore.</i></p>				
	<p>1.4 Have reports on the progress of the annual PDS plan/ program been communicated to all relevant stakeholders? e.g. HSE committee meetings / minutes of management reviews (Please highlight items relevant to PDS), PDS newsletters etc.</p>				
	<p>1.5 Are necessary resources (people and financial) required to implement PDS plan/program identified and planned? e.g. training, travel budget, head count etc.</p> <p><i>* Note: With reference to previous MPs 3.1 &amp; 3.2</i></p>				

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		YES	NO	NA		
<p><b>Applicability - LSP/M/T</b></p> <p><b>2. Accountability and Performance Measurement.</b></p> <p>Establishes responsibilities for implementing PDS throughout the organization.</p> <p>Measures performance against PDS goals/Plan.</p> <p><i>* Note: With reference to previous MPs 2</i></p>	2.1	Have clear responsibilities for implementing PDS goals/plan/program/management practices been established? e.g. job descriptions				
	2.2	Is there a regular assessment of the PDS goals/plan/program/management practices? e.g. internal audits, gap analysis etc.				
	2.3	Have the results of such assessments been reported to the company senior management and employees? e.g. minutes of management reviews/ HSE committee meetings, PDS newsletters, etc.				
	2.4	Have appropriate actions been implemented to close the gaps and/or findings of such assessments?				

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		YES	NO	NA	
<p><b>Applicability - M/T</b></p> <p><b>3. Health, Safety and Environmental Information.</b></p> <p>Gather and maintain up to date information on standard parameters, GHS hazard classification and exposure conditions for new and/or existing products.</p> <p><i>* Note: With reference to previous MP 4</i></p>	<p>3.1 Has up to date health, safety and environmental information been gathered and maintained for new and/or existing products?</p> <p>Information includes standard parameters e.g. chemical identity and use, toxicology, ecotoxicology, environmental fate physical-chemical properties and GHS hazard classification.</p> <p><b>Note:</b> You may refer to ICCA Global Product Strategy (GPS) Guidance on Chemical Risk Assessment for more details.</p>				
	<p>3.2 Has up to date exposure conditions been gathered and maintained for new and/or existing products?</p> <p>Exposure conditions information includes operational conditions and risk management measures, product characteristics, product uses, environmental characteristics.</p> <p><b>Note:</b> You may refer to ICCA GPS Guidance on Chemical Risk Assessment for more details.</p>				

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		YES	NO	NA	
<p><b>Applicability - M/T</b></p> <p><b>4. Product Risk Assessment.</b></p> <p>Establishes a process to assess the risk of new and/or existing products using information about its HSE hazards and reasonably foreseeable exposures.</p> <p>Establishes a system that initiates re-evaluation.</p> <p><i>* Note: With reference to previous MP 5</i></p>	<p>4.1 Have products been allocated priorities for product risk assessment; making use of information in 3.1 and 3.2?</p> <p><b>Note:</b> You may refer to ICCA GPS Guidance on Chemical Risk Assessment for more details.</p>				
	<p>4.2 Has a product risk assessment for new and/or existing products been conducted?</p> <p><i>*Please provide an example of a completed product risk assessment (not workplace risk assessment)</i></p>				
	<p>4.3 Is the product risk assessment reviewed periodically or as required*?</p> <p>*These may include but not limited to:</p> <ul style="list-style-type: none"> <li>• New product HSE information available</li> <li>• New distribution channels or markets</li> <li>• New intended use</li> <li>• Sales into a new / different market segment</li> <li>• New or changes to production process</li> <li>• Change in product ingredients or formulation</li> <li>• Changes to applicable regulations or standards</li> <li>• Incidents related to product storage, handling, disposal etc.</li> </ul>				

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		YES	NO	NA	
<p><b>Applicability – LSP/M/T</b></p> <p><b>5. Risk Management System.</b></p> <p>Establishes a system to identify, implement, document and review HSE risk-management actions appropriate to the product risk(s).</p> <p><i>*Note: With reference to previous MP 6</i></p>	<p>5.1 Is there a system in place to identify, evaluate, implement and monitor legal requirements in <b>Singapore</b> applicable to the product(s) and to ensure regulatory compliance of product(s)? e.g. NEA hazardous substances permit/license, SCDF P&amp;FM license, legal register (Please highlight items relevant to PDS) etc.</p> <p><i>*Please provide a copy of NEA hazardous substances permit/license, SCDF P&amp;FM license (as applicable), legal register (Please highlight items relevant to PDS) etc.</i></p>				
	<p>5.2 In the Product Risk Assessment, are risk management measures* identified and implemented?</p> <p>*These may include but not limited to:</p> <ul style="list-style-type: none"> <li>• Discontinuing sale of product (Elimination)</li> <li>• Review composition of product to substitute hazardous component with a less hazardous component (Substitution)</li> <li>• Ventilation (Engineering Controls)</li> <li>• Development of Safe Working Procedures (Administrative Controls)</li> <li>• Provision of Goggles, Gloves etc. (Personal Protective Equipment)</li> </ul> <p><b>Note: NA for LSP</b></p>				

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		YES	NO	NA	
<p><b>Applicability – LSP/M/T</b></p> <p><b>5. Risk Management System.</b></p> <p>Establishes a system to identify, implement, document and review HSE risk-management actions appropriate to the product risk(s).</p> <p><i>*Note: With reference to previous MP 6</i></p>	<p>5.3 In the Product Risk Assessment, are risk management measures reviewed periodically or as required?</p> <p><i>*These may include but not limited to:</i></p> <ul style="list-style-type: none"> <li>• New HSE information available</li> <li>• New distribution channels or markets</li> <li>• New intended use</li> <li>• Sales into a new / different market segment</li> <li>• New or changes to production process</li> <li>• Change in product ingredients or formulation</li> <li>• Changes to applicable regulations or standards</li> <li>• Incidents related to product storage, handling, disposal etc.</li> </ul> <p><b>Note: NA for LSP</b></p>				
	<p>5.4 Are product risks communicated* to all relevant stakeholders? (internal and external)</p> <p><i>*These may include but not limited to:</i></p> <ul style="list-style-type: none"> <li>• Safety Data Sheet (SDS)</li> <li>• Label</li> <li>• Product safety summary</li> <li>• Bulletins</li> <li>• Toolbox meetings etc.</li> </ul> <p><i>*Please provide an example of such communications.</i></p>				

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		YES	NO	NA	
<p><b>Applicability – M/T</b></p> <p><b>6. Product and Process Design and Improvement.</b></p> <p>Establishes and maintains a system that make HSE impacts - including the use of energy and natural resources - key considerations in designing, developing and improving products and processes.</p> <p><i>*Note: With reference to previous MP 7</i></p>	<p>6.1 Are product stewardship considerations taken during the R&amp;D phase of a new product prior to commercialisation and/or review of existing commercialised product? e.g. regulatory compliance, HSE impacts etc.</p> <p><i>*Please provide an example of a completed assessment for a new/existing product.</i></p>				
	<p>6.2 Are product stewardship considerations taken during the design/review of a new/existing manufacturing process? e.g. use of energy, natural resources etc.</p> <p><i>*Please provide an example.</i></p>				

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		YES	NO	NA		
<p><b>Applicability - LSP/M/T</b></p> <p><b>7. Employee Education and Product Use Feedback.</b></p> <p>Educates and trains employees (based on job function) on the safe handling, use, recycling and disposal of products.</p> <p>Implements a system that encourages employees to feedback information on identified misuses or adverse effects for use in product risk assessment.</p> <p><i>*Note: With reference to previous MP 8</i></p>	7.1	Is there a process to identify the PDS training needs of employees in <b>Singapore</b> (based on job function)? e.g. training matrix				
	7.2	Has an annual PDS training plan for employees in <b>Singapore</b> been developed?				
	7.3	<p>Have the employees in Singapore received PDS training as per training needs and/or annual PDS training plan?</p> <p>If yes, please provide sample training records and materials for the period of awards assessment.</p> <p><i>*Note: With reference to previous MP 8.1 &amp; 8.3</i></p>				
	7.4	<p>Is there a system for employees in Singapore to provide feedback/report PDS near miss or incidents as well as on identified misuses or adverse effects from use of product?</p> <p>*Where available, please provide an example of a reported PDS near miss/incident.</p> <p><i>*Note: With reference to previous MP 8.4</i></p>				

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		YES	NO	NA	
<p><b>Applicability - M/T</b></p> <p><b>8. Contract Manufacturers.</b></p> <p>Selects contract manufacturers who employ appropriate practices for HSE protection for the operations under contract, or works with contract manufacturers to help them implement such practices.</p> <p>Provides information and guidance appropriate to the product and process risk to foster safe handling/use, recycling/disposal.</p> <p>Periodically reviews performance of contract manufacturers</p> <p><i>*Note: With reference to previous MP 9</i></p>	<p>8.1 Is there a process to select a new contract manufacturer?</p> <p>This process shall include evaluation of the HSE practices of the contract manufacturer.</p> <p><i>*Please provide an example of a completed evaluation for a potential/existing contract manufacturer, highlighting the HSE elements.</i></p>				
	<p>8.2 Is there a process to review the HSE performance of existing contract manufacturers and to suggest improvements?</p> <p>e.g. use of clear defined KPIs, periodic meetings/audits with contract manufacturers</p> <p><i>*Please provide minutes of meetings, audit reports, completed checklists (if any).</i></p>				
	<p>8.3 Commensurating with product risk; is product HSE information and PDS support provided to existing contract manufacturers?</p> <p>These may include but not limited to:</p> <ul style="list-style-type: none"> <li>• Label</li> <li>• SDS</li> <li>• Training on safe handling/use/recycling/disposal etc.</li> </ul> <p><i>*Please provide evidence of label/SDS distribution, training records, materials etc.</i></p>				

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		YES	NO	NA	
<p><b>Applicability – M</b></p> <p><b>9. Raw Material Suppliers.</b></p> <p>Requires raw material suppliers to provide appropriate HSE information and guidance on their products.</p> <p>Factors adherence to sound HSE principles into procurement decisions.</p> <p><i>*Note: With reference to previous MP 10</i></p>	<p>9.1 Are HSE elements taken into considerations when procuring new raw materials and/or new suppliers?</p> <p>e.g. contractual agreements which includes HSE expectations and requirements, evaluation /checklist etc.</p> <p><i>*Please provide a copy of a completed evaluation/checklist, highlighting the HSE elements</i></p> <p><i>**For contracts, please highlight the HSE expectations/requirements.</i></p>				
	<p>9.2 Are raw material suppliers required to provide HSE information* on their products?</p> <p>*These may include but not limited to:</p> <ul style="list-style-type: none"> <li>• Raw Material Questionnaire</li> <li>• Training on safe storage, handling, usage, disposal etc.</li> <li>• Label</li> <li>• SDS</li> </ul> <p><i>*Please provide an example of a completed raw material questionnaire, training records / materials by raw material suppliers, communication on distribution of labels, SDS etc. (as applicable)</i></p>				
	<p>9.3 Are raw material suppliers required to communicate any changes and/or new information to the manufacturing process, product formulation, Safety Data Sheet, label etc.</p> <p><i>*Please provide an example of such communications.</i></p>				

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		YES	NO	NA	
<p><b>Applicability – M/T</b></p> <p><b>10. Logistics Service Providers.</b> (3PLs)</p> <p>Provides HSE information to logistics service providers.</p> <p>Commensurate with product risk, selects, works with and periodically reviews logistics service providers to foster safe storage/handling/recycling/disposal.</p> <p><i>*Note: With reference to previous MP 11</i></p>	<p>10.1 Is there an evaluation process to select a new logistics service provider in Singapore?</p> <p><i>*Please provide an example of a completed evaluation for a potential/existing logistics service provider, highlighting the HSE elements.</i></p>				
	<p>10.2 Is there a process to review the HSE performance of existing logistics service provider(s) in Singapore and to suggest improvements?</p> <p>These may include but not limited to:</p> <ul style="list-style-type: none"> <li>• Use of clear defined KPIs</li> <li>• Periodic meetings with LSPs</li> <li>• Periodic audits with LSPs</li> </ul> <p><i>*Please provide minutes of meetings, audit reports, completed checklists (if any).</i></p>				
	<p>10.3 Commensurating with product risk; is product HSE information and support provided to logistics service provider(s) in Singapore?</p> <p>These may include but not limited to:</p> <ul style="list-style-type: none"> <li>• Label</li> <li>• SDS</li> <li>• Training on safe storage/handling/recycling/ disposal etc.</li> </ul> <p><i>*Please provide evidence of label/SDS distribution, training records, materials etc.</i></p>				

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		YES	NO	NA	
<p><b>Applicability – M/T</b></p> <p><b>10. Logistics Service Providers.</b> (3PLs)</p> <p>When a company identifies improper practices involving a product, it will work with the logistics service provider to improve those practices.</p> <p>If, in the company's independent judgment, improvement is not evident, then the company should take further measures - up to and including termination of the business relationship.</p> <p><i>*Note: With reference to previous MP 11</i></p>	<p>10.4 Is there a mechanism to gather and document feedback on logistics services providers in Singapore to address concerns? e.g. improper storage/handling practices etc.</p> <p><i>*Where available, please provide an example of such feedback.</i></p>				
	<p>10.5 Is there a mechanism to determine if business with a logistics service provider in Singapore should continue? e.g. outcome of performance review etc.</p>				
	<p>10.6 Is there a company Emergency Response Plan with clear roles &amp; responsibilities (including sales &amp; marketing personnel) to manage product related emergencies during storage and/or transportation; interfacing with Logistics Service Provider and customers e.g. product recall procedure, business continuity plan etc.</p>				
	<p>10.7 Has nominated company personnel in Singapore received training to manage such product related emergencies?</p> <p><i>*Please provide training records/materials for these nominated company personnel.</i></p>				
	<p>10.8 Is this Emergency Response Plan tested periodically?</p> <p><i>*Please provide evidence of an emergency exercise conducted.</i></p>				

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		YES	NO	NA	
<p><b>Applicability – M/T</b></p> <p><b>11. Customers and/or other Direct Product Receivers.</b></p> <p>Provide HSE information to customers and/or other direct product receivers e.g. distributor/trader etc.</p> <p>Commensurate with product risk, works with them to foster proper use, handling, recycling, disposal and transmittal of appropriate information to downstream users (as applicable).</p> <p>When a company identifies improper practices involving a product, it will work with the customers and/or other direct product receivers to improve those practices.</p> <p>If in the company's independent judgment, improvement is not evident, then the company should take further measures - up to and including termination of product sale.</p>	<p>11.1 Is product HSE information such as SDS communicated to customers and/or other direct product receivers in Singapore?</p> <p><i>*Please provide evidence of SDS distribution.</i></p>				
	<p>11.2 Commensurating with product risk; are customers and/or other direct product receivers in Singapore trained on product HSE information such as proper practices for storage/handling/use/recycling/disposal/emergency response?</p> <p><i>*Please provide evidence of training records/materials.</i></p>				
	<p>11.3 Commensurating with product risk; is there a system in place to verify that other direct product receivers in Singapore transmit necessary product HSE information to downstream users?</p>				
	<p>11.4 Commensurating with product risk; do sales and marketing personnel (with appropriate technical support) conduct regular reviews/site visits and report on customer's and/or other direct product receiver's in Singapore implementation of proper practices for storage / handling / use / recycling / disposal of your products?</p> <p><i>*Please provide a copy of the report.</i></p>				
	<p>11.5 Is there a mechanism to gather and document feedback on customers and/or other direct product receivers in Singapore and to address their concerns? e.g. product usage and improper storage/handling practices etc.</p>				

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<p style="color: red;">*Note: With reference to previous MP 12</p>	<p style="color: red;">*Where available, please provide an example of such feedback.</p>				
	<p>11.6 Is there a mechanism to determine if business with a customer and/or other direct product receiver in Singapore should continue? e.g. outcome of review/site visit?</p>				