

Annual Self-Evaluation Form
Code of Practice
POLLUTION PREVENTION



Guideline for Implementation of Management Practices

1. INTRODUCTION

Definition

The purpose of the Pollution Prevention Code is to achieve ongoing reduction of releases to the air, land and water; and ongoing reduction of wastes generated at facilities. It also covers waste management issues in regulatory compliance, implement policies of elimination, reduction, recycling, treatment and disposal; and handling, storage and transport of wastes.

It is important to have a clear understanding of two things mentioned frequently in this code of management practices, “Waste” and “Release”:

- Waste is any gas, liquid, or solid residual material at a facility, whether hazardous or non-hazardous, that is not used further in the production of a commercial product
- Release is any emission, effluent, spill, discharge or disposal to the air, land, or water from a facility, whether routine or accidental

Companies shall have programmes for the following key management practices:

- A clear commitment to the on-going reduction of wastes and releases.
- Maintain inventory for wastes generated at facilities.
- Maintain records of releases to the air, land and water.

Annual Self-Evaluation Form

- Share the potential impact of wastes and releases to the environment and the health and safety of employees and the public.
- Execute on-going reduction plans for the reduction of wastes and releases and establish key performance indicators (KPI).
- Measure the progress of the reduction of wastes and releases.
- Promote and support on-going reduction activities carried out by others.
- Implement system to select contractors based on sound waste practices.
- Resolve environmental issues caused by past operations.

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 following:

- Part 1 of "INTRODUCTION", and
- Part 2 of "SELF-EVALUATION FORM" that consists 11 management practices for the Pollution Prevention 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 Pollution Prevention Code is applicability to these categories, i.e. Manufacturer (M) and Logistics & Service Providers (LSP) only.

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 have met 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 the progress of Responsible Care implementation and awarding of the SCIC Responsible Care Awards. Company is required to attach documents to substantiate

Annual Self-Evaluation Form

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 shall 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	
<p>Applicability - LSP/M</p> <p>1. Management commitment</p> <p>A clear commitment by senior management through company policy and allocation of resources to reduce releases to the air, land and water, as well as in the generation of wastes.</p>	1.1 Are there environmental policy on prevention of pollution display at sites?				
	1.2 Has the top/senior management team emphasize the importance of prevention of pollution in management review / meeting at least once a year?				
	1.3 Are there any written Job description with clear responsibility in pollution Prevention within the organisation?				
	1.4 Are there evidence to recognise employee on their pollution prevention efforts within 1 year? e.g. some form of evidence such as email or letter of commendation				
	1.5 Are there any KPI/objective set to meet the pollution prevention action plan?				
<p>Applicability - LSP/M</p> <p>2. Record keeping</p> <p>Inventory record-keeping of wastes generated from the facilities and releases to the air, land and water</p>	2.1 Are there evidence of employee with relevant <u>competency</u> to maintain the inventory record of the waste and environmental releases? e.g. training records or document record keeping experience – e.g. JD/resume				
	2.2 Is there a summary of all the identified waste and environmental release inventory?				
	2.3 Does the management acknowledge the latest inventory of waste and environmental releases? e.g. endorsement in either summary list or meeting minutes				

Annual Self-Evaluation Form

Management Practice	Guidelines for Implementation	Status			Evidence/Remarks
		YES	NO	NA	
<p>Applicability - LSP/M</p> <p>3. Evaluation and compliance</p> <p>Evaluation carried out for the environmental impacts of the releases, and result of the evaluation is used to establish priorities for the reduction of releases.</p>	3.1 Has an annual evaluation been carried out for environmental releases?				
	3.2 Are the environmental releases making reference to the <u>legal limits</u> and meeting its <u>compliance status</u> ?				
<p>Applicability - LSP/M</p> <p>4. Dialogues input</p> <p>Sharing and educating employees and the community on environmental information to establish an interactive process in order to generate dialogue and useful feedbacks.</p>	4.1 Are there any regular dialogues being carried out with employees, contractors, neighbours and the community on environmental issues? e.g. pictures of dialogues or attendance record <i>*Note: with reference to previous MP 11.1</i>				
	4.2 Are the concern raised during the dialogues used in developing reduction plan, please provide evidence? e.g. minutes of meeting <i>*Note: with reference to previous MP 11.2</i>				

Annual Self-Evaluation Form

Management Practice	Guidelines for Implementation	Status			Evidence/Remarks
		YES	NO	NA	
<p>Applicability - LSP/M</p> <p>5. Develop pollution prevention action plan</p> <p>Establish priorities, goals and pollution prevention plans with the allocation of resources, steps and timing for the reduction of wastes and releases.</p>	5.1 Is there a summary list of prioritized wastes and releases for reduction?				
	5.2 Are the pollution prevention action plan established on the prioritized wastes and releases?				
	5.3 Is the Plan supported by management and is well communicated? e.g. meeting minutes				
	5.4 Is there appropriate resource provided/allocated by the management? e.g. meeting minutes or appointment letter				
	5.5 Is Periodic review made to shorten the action pollution prevention action plan?				
<p>Applicability - LSP/M</p> <p>6. Implementation of pollution prevention action plan</p> <p>Ongoing reduction of wastes and releases in accordance with the pollution prevention plans (under Practice 5), giving preference first to source reduction, second to recycle/reuse, and third to treatment</p> <p><i>*Note: With reference to previous MP 11.3</i></p>	6.1 Does the plan has consideration to <u>reduce</u> the prioritized waste and releases generation at source?				
	6.2 Does the plan has consideration for <u>recycle/reuse</u> and <u>treatment</u> of the prioritized waste and releases?				
	6.3 Are there evidence of the plan being implemented?				
	6.4 Are there evaluation carried out for the implementation?				

Annual Self-Evaluation Form

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		YES	NO	NA	
<p>Applicability - LSP/M</p> <p>7. Results</p> <p>Measure progress at each facility and update of record-keeping (under Practice 2) to reflect the progress in reduction of wastes and releases.</p>	7.1 Are there periodic trends and benchmarking against KPI/objective set to show <u>reduction</u> , <u>recycle</u> and <u>reuse</u> efforts of the prioritized waste and releases?				
	7.2 Are the management reviewing the current and past trends of the prioritise waste and release? e.g. meeting minutes				
	7.3 Are there efforts made to identify opportunities for improvement to the current trends against past trends?				
<p>Applicability - LSP/M</p> <p>8. Dialogues output</p> <p>Ongoing dialogues with employees and the community on pollution prevention efforts and progress to generate mutual feedbacks.</p>	8.1 Are there evidence of dialogues with employees, contractors and neighbours on pollution prevention efforts and their results? e.g. pictures of dialogues or attendance record <i>*Note: With reference to previous MP 11.1</i>				
	8.2 Are there evidence to capture additional input/feedback from the pollution prevention efforts taken during the dialogues? <i>*Note: With reference to previous MP 11.1</i>				
<p>Applicability - LSP/M</p> <p>9. Facility design</p> <p>Company policy on prevention of wastes and releases in design of new facilities or modification of facilities, processes or products.</p>	9.1 Is there policy/guideline for initial facility design to avoid long-term waste/releases impact?				
	9.2 Are there consideration taken during the Management of Change (MOC) to reduce the environmental impact? e.g. MOC checklist with environmental consideration				

Annual Self-Evaluation Form

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		YES	NO	NA	
<p>Applicability - LSP/M</p> <p>10. Promotion</p> <p>Ongoing programs for promotion and support of waste and release reduction by others.</p>	10.1 Are there any internal environmental newsletter?				
	10.2 Are there any external <u>participation</u> within the industry or with authority to promote pollution prevention?				
	10.3 Are there any evidence on <u>contribution</u> to regulatory agency in relation to pollution prevention?				
	10.4 Are there evidence of annual refresher training/awareness to employee? *Note: With reference to previous MP 4.3				
<p>Applicability - LSP/M</p> <p>11. Contractor selection</p> <p>Implementation of contractor selection scheme taking into account of sound waste practices of such contractors.</p>	11.1 Are there any evidence of environmental consideration (management system / waste management) in contractor selection?				