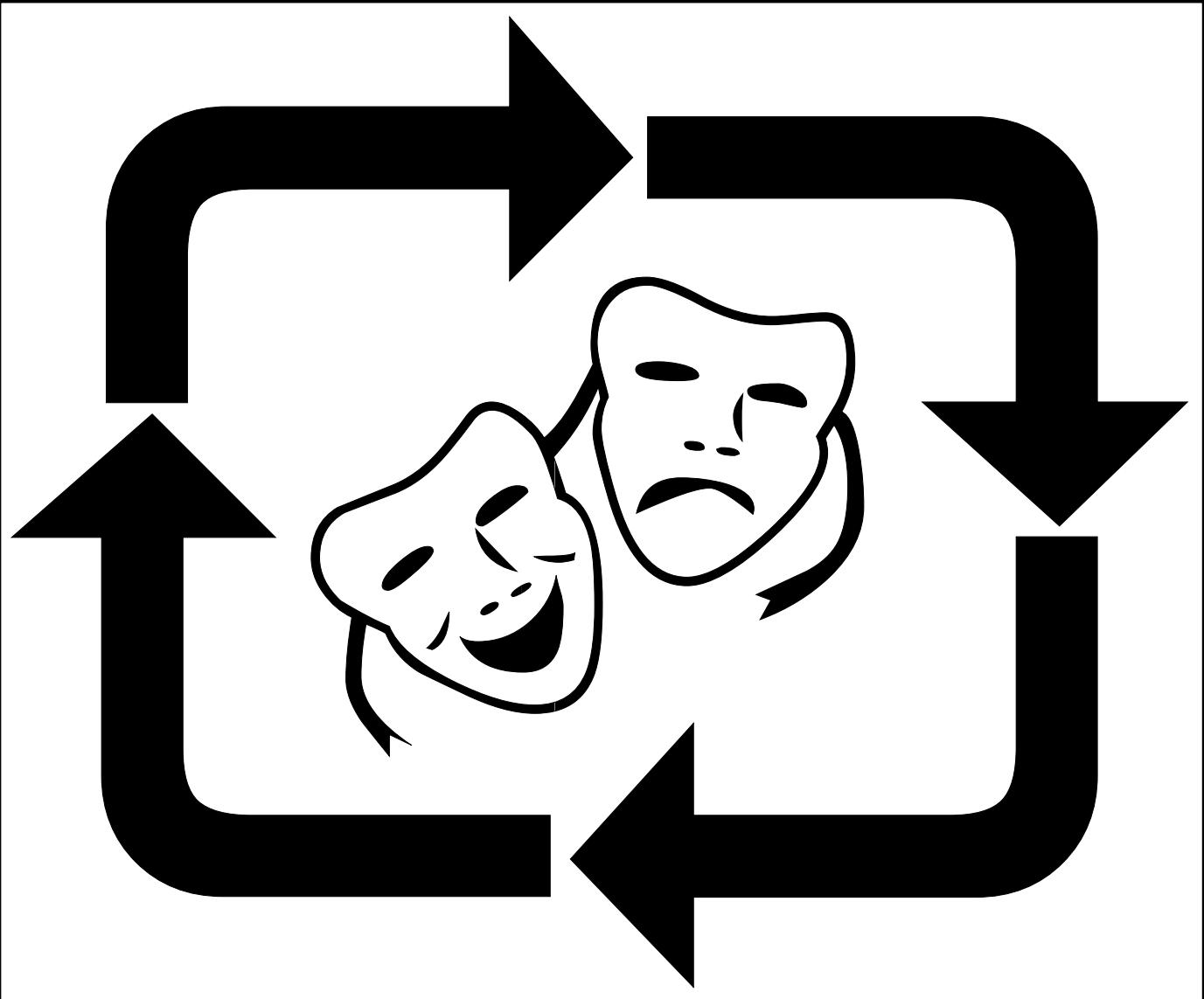


Product Stewardship Program



for
Entertainment Lamps

What is Product Stewardship?

Health, Safety and Environmental Protection

Product Stewardship is the safe use and handling of products at all stages of their lifecycles. Health, safety and environmental protection must be an integral part of designing, manufacturing, marketing, distributing, using, recycling and disposing of products.

In order for your business to operate successfully and in compliance with regulatory requirements, you need to be aware of many environmental, health and safety laws and product hazards. This includes knowing how to receive, handle and store products correctly, minimize waste generation and dispose of wastes properly. When you have Product Stewardship questions concerning products or services, your supplier is the place to turn for assistance.

Product Stewardship — Responsibilities and Expectations

Product Stewardship is Everybody's Responsibility

To fulfill management and employee commitments to our customers and suppliers, we will:

- Meet all of our regulatory requirements;
- Provide health and safety information through Material Safety Data Sheets (MSDS);
- Work to minimize the environmental, health and safety risks associated with our products;
- Train employees in the company's Product Stewardship process;
- Respond to customer questions concerning the safe use and handling of our products;
- Use responsible distributors, suppliers, warehouses and carriers; and
- Respond back to customers on product health effects.

Customer and Supplier Product Stewardship Responsibilities

We expect our customers and suppliers to be good product stewards, to operate in a safe and responsible manner and to:

- Meet all of their regulatory requirements;
- Provide their employees, suppliers and customers with appropriate health and safety information;
- Use our products as intended;
- Have appropriate equipment and qualified, trained personnel to safely receive, store, process and dispose of products;
- Request additional information when needed; and
- Use responsible distributors, suppliers, warehouses and carriers.

Vision Statement

Our industry creates products and services that entertain and enlighten people's lives around the world. These benefits are, of necessity, accompanied by enduring responsibilities and commitments in the management of these products. We will make continuous progress toward the vision of no accidents, injuries or harm to the environment and will publicly report our global health, safety and environmental performance.

Mission Statement

We will lead our companies in ethical ways that increasingly benefit society, the economy and the environment while adhering to the following principles:

- To seek and incorporate public input regarding our products and operations.
- To provide products that can be manufactured, transported, used and disposed of safely.
- To make health, safety, the environment and resource conservation critical considerations for all new and existing products and processes.
- To provide information on health or environmental risks and pursue protective measures for employees, the public and other key stakeholders.
- To work with customers, carriers, suppliers, distributors and contractors to foster the safe use, transport and disposal of products.
- To operate our facilities in a manner that protects the environment and the health and safety of our employees and the public.
- To support education and research on the health, safety and environmental effects of our products and processes.
- To work with others to resolve problems associated with past handling and disposal practices.
- To lead in the development of responsible laws, regulations and standards that safeguard the community, workplace and environment.
- To practice Product Stewardship by encouraging and assisting others to adhere to these principles and practices.

Sample Product Stewardship Statement

Every *Widget* employee shall promote health, safety and environmental considerations within his or her area of activity. Employees shall be receptive to new information and carefully consider its significance.

Distributors and customers must be given the necessary information and advice to enable them to transport, store, handle, use and dispose of our products safely. If, based on scientific evidence, it becomes necessary to avert a potential health or environmental hazard, *Widget* shall promptly inform customers and the public and take appropriate action up to and including production curtailment.

Widget actively develops and markets products that are environmentally sound. *Widget* products, after proper use, should be safe in recycling or disposal and present no adverse effect on the environment. Recycling is to be encouraged to conserve natural resources.

Vision & Mission Statement

Code of Practice

Purpose and Scope

The purpose of the Product Stewardship Code of Practice is to make health, safety and environmental protection an integral part of designing, manufacturing, marketing, distributing, using, recycling and disposing of our products. The Code provides guidance as well as a means to measure continuous improvement in the practice of product stewardship.

The scope of the Code covers all stages of a product's life. Successful implementation is a shared responsibility. Everyone involved with the product has responsibilities to address society's interest in a healthy environment and in products that can be used safely. All employers are responsible for providing a safe workplace, and all who use and handle products must follow safe and environmentally sound practices.

The Code recognizes that each company must exercise independent judgment and discretion to successfully apply the Code to its products, customers and business.

Relationship to Guiding Principles

Implementation of the Code promotes achievement of several of the Mission Statement Principles:

- To make health, safety and environmental considerations a priority in our planning for all existing and new products and processes;
- To develop and produce products that can be manufactured, transported, used and disposed of safely;
- To extend knowledge by conducting or supporting research on the health, safety and environmental effects of our products, processes and waste materials;
- To counsel customers on the safe use, transportation and disposal of products;
- To report promptly to officials, employees, customers and the public, information on 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 products.

Management Practices

Each company shall have an ongoing product stewardship process that includes:

Management Leadership and Commitment

1. **LEADERSHIP:** Demonstrates senior management leadership through written policy, active participation and communication.
2. **ACCOUNTABILITY and PERFORMANCE MEASUREMENT:** Establishes goals and responsibilities for implementing product stewardship throughout the organization. Measures performance against these goals.
3. **RESOURCES:** Commits resources necessary to implement and maintain product stewardship practices.

Information and Characterization

4. **HEALTH, SAFETY and ENVIRONMENTAL INFORMATION:** Establishes and maintains information on health, safety, and environmental hazards and reasonably foreseeable exposures from new and existing products.
5. **PRODUCT RISK CHARACTERIZATION:** Characterizes new and existing products with respect to their risk using information about health, safety, and environmental hazards and reasonably foreseeable exposures. Establishes a system that initiates re-evaluation.

Management Practices Continued

Risk Management

6. **RISK-MANAGEMENT SYSTEM:** Establishes a system to identify, document, and implement health, safety, and environmental risk-management actions appropriate to the product risk.
7. **PRODUCT and PROCESS DESIGN and IMPROVEMENT:** Establishes and maintains a system that makes health, safety and environmental impacts-including the use of energy and natural resources-key considerations in designing, developing and improving products and processes.
8. **EMPLOYEE EDUCATION and PRODUCT USE FEEDBACK:** Educates and trains employees, based on job function, on the proper handling, recycling, use, and disposal of products and known product uses. Implements a system that encourages employees to feed back information on new uses, identified misuses or adverse effects for use in product risk characterization.
9. **CONTRACT MANUFACTURERS:** Selects contract manufacturers who employ appropriate practices for health, safety and environmental protection for the operations under contract, or works with contract manufacturers to help them implement such practices. Provides information and guidance appropriate to the product and process risk to foster proper handling, use, recycling and disposal. Periodically reviews performance of contract manufacturers.
10. **SUPPLIERS:** Requires suppliers to provide appropriate health, safety and environmental information and guidance on their products. Factors adherence to sound health, safety, and environmental principles into procurement decisions.
11. **DISTRIBUTORS:** Provides health, safety and environmental information to distributors. Commensurate with product risk, selects, works with and periodically reviews distributors to foster proper use, handling, recycling, disposal and transmittal of appropriate information to downstream users. When a company identifies improper practices involving a product, it will work with the distributor to improve those practices. 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.
12. **CUSTOMERS AND OTHER DIRECT PRODUCT RECEIVERS:** Provides health, safety and environmental information to direct product receivers. Commensurate with product risk, works with them to foster proper use, handling, recycling, disposal, and transmittal of appropriate information to downstream users. When a company identifies improper practices involving a product, it will work with the product receiver to improve those practices. 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.

Code of Practice

Lamp Manufacturer Product Stewardship Check-List

Lamp Manufacturer Product Stewardship Check List

This checklist is intended to facilitate the establishment and maintenance of a Product Stewardship Program for manufacturers of lamps containing mercury. This is a voluntary program intended to foster improved industrial safety and to foster appropriate purchasing, handling, use and disposal of all chemicals and other materials involved in the manufacture and use of mercury containing lamps.

Compliance Step:

Yes/No

| | |
|--|--|
| 1. Has your material supplier provided appropriate MSDS documentation? | |
| 2. Do your suppliers know that you need and use this information and that they should send you any updates? | |
| 3. Do you know your chemical suppliers' safety and/or product stewardship officers and how to contact them? | |
| 4. Has someone in your company been assigned the responsibility of managing product safety and stewardship information? | |
| 5. Has this information been communicated to other involved employees? | |
| 6. Have you established appropriate methods for receiving mercury? | |
| 7. Have these methods been suitably documented? | |
| 8. Are there procedures to ensure materials meet specifications? | |
| 9. Have you established appropriate methods for storing mercury? | |
| 10. Have you trained your employees in the appropriate handling of this material? | |
| 11. Have you established quality control procedures to ensure proper formulation of your mercury-containing products? Are you willing to provide data? | |
| 12. Are you familiar with all safety procedures related to the manufacture of your products? | |
| 13. How are your products physically distributed to your clients? | |
| 14. Have you taken steps to ensure that the carriers or shipping companies that physically distribute your products are knowledgeable about any special procedures or practices needed for shipping your products? | |
| 15. Have you provided your carriers and shipping companies with the safety related data they need to carry your products safely and in accordance with any applicable regulations? | |
| 16. Have you taken steps to ensure that your customers know and understand which lamps require special shipping procedures? | |
| 17. Do your products have any special storage or on-site handling requirements? | |
| 18. Have you informed your customers about these storage or on-site handling requirements? How have you informed them of these requirements? | |
| 19. Do you provide up to date MSDS sheets or other safety related information to your customers? How? | |

Lamp Manufacturer Product Stewardship Check List *continued*

Compliance Step:

Yes/No

| | |
|--|--|
| 20. Do you provide comprehensive operating instructions for the equipment you supply? | |
| 21. Do your products have any environmental or health and safety concerns in operation or disposal? If there are, is there documentation available about the proper use and disposal of the products? How do you communicate this information to your customers? | |
| 22. Do you have procedures for dealing with complaints and problems relating to environmental and health and safety issues? How are those procedures communicated to your employees? How are those procedures communicated to your customers? | |
| 23. Do you provide information and assistance on dealing with the final disposal or recycling of your product at the end of its life? How do you provide this information and assistance? | |
| 24. Is your company willing to support any claims of the non-hazardous nature of products with data from independent sources backing that claim? | |
| 25. How do you ensure the correct mercury recycling procedures have been followed in-house? | |
| 26. Is there a procedure to insure the regular re-evaluation of your safety and product stewardship programs? | |
| 27. Are you ISO 14000 certified? If not, do you have procedures equivalent to those required for ISO 14000 certification? | |
| 28. Is your company involved in a mandated source reduction program to reduce hazards at the source? | |
| 29. Is your company involved in supporting sustainability? | |

To the best of my knowledge, this information is true and accurate

Product Stewardship Manager: _____

Company: _____

Date: _____

Lamp Manufacturer Product Stewardship Check-List

Lamp Distributor Product Stewardship Check-List

Lamp Distributor Product Stewardship Check List

This checklist is intended to facilitate the establishment and maintenance of a product stewardship program for distributors of lamps containing mercury. This is a voluntary program intended to foster improved industrial safety and to foster appropriate purchasing, handling, use and disposal of all chemicals and other materials involved in the manufacture and use of mercury containing lamps.

Compliance Step:

Yes/No

| | |
|--|--|
| 1. Have your lamp suppliers provided appropriate MSDS and TCLP documentation upon request? | |
| 2. Do your suppliers know that you need and use this information and that they should send you any updates? | |
| 3. Do you know your lamp supplier's safety and/or product stewardship officers and how to contact them? | |
| 4. Has someone in your company been assigned the responsibility of managing product safety and stewardship information? | |
| 5. Has this information been communicated to other involved employees? | |
| 6. Have you established appropriate methods for receiving the lamps? | |
| 7. Have these methods been suitably documented? | |
| 8. Have you established appropriate methods for storing mercury-containing lamps? | |
| 9. Have you trained your employees in the appropriate handling of mercury-containing lamps? | |
| 10. How are your lamps shipped to your customers? | |
| 11. Have you taken steps to ensure that the carriers or shipping companies that physically distribute your lamps are knowledgeable about any special procedures or practices needed for shipping your lamps? | |
| 12. Have you provided your carriers and shipping companies with the safety related data they need to carry your lamps safely and in accordance with any applicable regulations? | |
| 13. Have you taken steps to ensure that your customers know and understand which lamps require special shipping procedures? | |
| 14. Do your products have any special storage or on-site handling requirements? | |
| 15. Have you informed your customers about these storage or on-site handling requirements? How have you informed them of these requirements? | |
| 16. Do you provide up to date MSDS sheets or other safety related information to your customers? How? | |
| 17. Do you provide comprehensive operating instructions for the equipment you supply? | |

Lamp Distributor Product Stewardship Check List *continued*

| Compliance Step: | Yes/No |
|---|--------|
| 18. Do your products have any environmental or health and safety concerns in operation or disposal? If there are, is there documentation available about the proper use and disposal? How do you communicate this information to your customers? | |
| 19. Do you have procedures for dealing with complaints and problems relating to environmental and health and safety issues? How are those procedures communicated to your employees? How are those procedures communicated to your customers? | |
| 20. Do you provide information and assistance on dealing with the final disposal or recycling of the lamps at the end of their lives? How do you provide this information and assistance? | |
| 21. Is your supplier willing to support any claims of the non-hazardous nature of products with data from independent sources backing that claim? | |
| 22. How do you ensure the correct mercury clean-up and recycling procedures have been followed in-house? | |
| 23. Is there a procedure to insure the regular re-evaluation of your safety and product stewardship programs? | |
| 24. Is your supplier ISO14000 certified or does it have equivalent procedures in place? | |
| 25. Is your supplier involved in a mandated source reduction program to reduce hazards at the source? | |
| 26. Is your supplier involved in supporting sustainability? | |

To the best of my knowledge, this information is true and accurate

Product Stewardship Manager: _____

Company: _____

Date: _____

Lamp Distributor Product Stewardship Check-List

Lamp User Product Stewardship Check-List

Lamp User Product Stewardship Check List

This checklist is intended to facilitate the establishment and maintenance of a product stewardship program for users of lamps containing mercury. This is a voluntary program intended to foster improved industrial safety and to foster appropriate purchasing, handling, use and disposal of all chemicals and other materials involved in the manufacture and use of mercury containing lamps.

Compliance Step:

Yes/No

| | |
|--|--|
| <ol style="list-style-type: none">1. Have your lamp suppliers provided appropriate MSDS and TCLP documentation upon request? | |
| <ol style="list-style-type: none">2. Do your suppliers know that you need and use this information and that they should send you any updates? | |
| <ol style="list-style-type: none">3. Do you know your lamp supplier's safety and/or product stewardship officers and how to contact them? | |
| <ol style="list-style-type: none">4. Has someone in your company been assigned the responsibility of managing product safety and stewardship information? | |
| <ol style="list-style-type: none">5. Has this information been communicated to other involved employees? | |
| <ol style="list-style-type: none">6. Have you established appropriate methods for receiving the lamps? | |
| <ol style="list-style-type: none">7. Have these methods been suitably documented? | |
| <ol style="list-style-type: none">8. Are there special requirements for storing mercury-containing lamps? | |
| <ol style="list-style-type: none">9. Have you established appropriate methods for storing mercury-containing lamps? | |
| <ol style="list-style-type: none">10. Have you trained your employees in the appropriate storing of mercury-containing lamps? | |
| <ol style="list-style-type: none">11. Do you provide your employees with comprehensive operating instructions for the equipment you supply? | |
| <ol style="list-style-type: none">12. Do you make MSDS or other information such as TCLP data on mercury-containing lamps available to your employees? How do you do this? | |
| <ol style="list-style-type: none">13. Do you have procedures for dealing with complaints and problems relating to health and safety issues? How are those procedures communicated to your employees? How are those procedures communicated to your customers? (If applicable) | |

Lamp User Product Stewardship Check List *continued*

| Compliance Step: | Yes/No |
|---|--------|
| 14. Do you know and understand the procedures for dealing with final disposal and recycling of these products in your state at the end of their life? | |
| What are these procedures? | |
| How do you ensure the correct mercury recycling procedures have been followed? | |
| 15. Is there a procedure to insure the regular re-evaluation of your safety and product stewardship programs? | |
| 16. Do you select manufacturers that practice product stewardship? | |
| How do you find out which manufacturers practice product stewardship? | |

To the best of my knowledge, this information is true and accurate

Product Stewardship Manager: _____

Company: _____

Date: _____

Lamp User Product Stewardship Check-List

Product Stewardship FAQ

How is product stewardship different from the other health, safety, and environmental practices?

Many of the more traditional health, safety, and environmental programs or practices tend to focus on regulatory compliance issues. Product stewardship strengthens and broadens the focus to include such concepts as customer interaction and dialog on how to foster proper use, handling, recycling, and disposal of products. It is a comprehensive integration of health, safety, environmental (including energy and natural resource conservation) considerations into each aspect of a company's operations, from design and initial manufacturer to distribution, sale, and disposal.

How does Product Stewardship relate to other regulations and codes?

A companies' Product Stewardship implementation should be comprehensive and therefore encompass all relevant codes and regulations. A key point is that Product Stewardship addresses third parties. A major portion of the Code is focused on a company's interactions with suppliers, distributors, contract manufacturers, and customers. Other portions address the gathering and characterization of health, safety, and environmental information, and design for the environment.

What type of information should be provided to customers, distributors, and other third-parties? How can this information be provided?

Information that would help protect health, safety, and the environment should be provided. In addition to material safety data sheets and label information, a company may choose to provide additional information through bulletins, videos, instructional workshops or seminars, training programs, or site visits. The appropriate actions and communication media will vary with each company and with the product risk.

How far down the chain-of-commerce does Product Stewardship apply?

The ESTA Product Stewardship Code is intended to cover as much of the chain of commerce as necessary to help ensure the proper use, handling, and other activities that might have the potential for harm to people or the environment. The main focus of the management practices is on suppliers, distributors, customers, and other direct product receivers, or those with whom there is a close business relationship. Companies are encouraged to work with their distributors, suppliers, and others, to have them assure product stewardship with their direct customers.

Does Product Stewardship require a burdensome and costly formal life cycle analysis program?

No, Product Stewardship does not require the development or implementation of a formal life cycle analysis program. The program recognizes that each company must exercise independent judgment and discretion to successfully apply the Code to its specific products, customers, and business. However, some companies may decide that a formal life cycle analysis is an appropriate part of the company's product stewardship program.

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