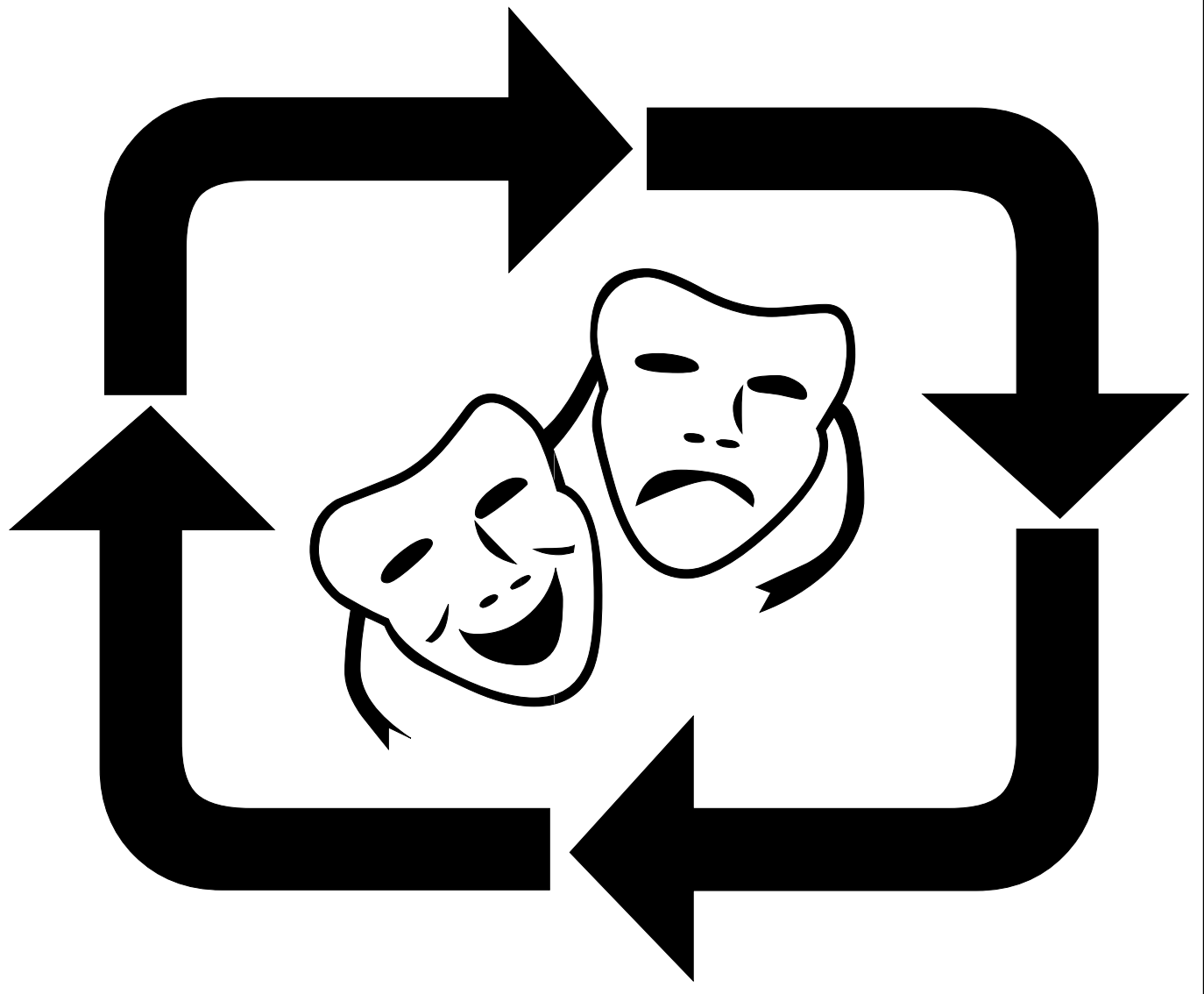


ESTA

Product Stewardship



What is Product Stewardship
Vision Statement
Code of Practice
Sample Company Statement
Sample Check-List

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.

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.

Sample Product Stewardship Statement

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.

Sample Product Stewardship Check-List

For each product:

1. Am I familiar with any and all safety related issues with the products I supply?	
2. Can I provide up to date MSDS sheets or other safety related information?	
3. Do I know where to obtain updates to this information?	
4. Do my suppliers know that I need and use this information and that they should send me any updates in a timely manner?	
5. Do I make this information readily available to my customers?	
6. Do my customers know I have this information and am I proactive in providing it?	
7. Do I provide comprehensive operating instructions for the equipment I supply? This may include manuals, videos and direct training.	
8. Do my products have any health and safety concerns in operation? If so, what are they?	
9. Do my customers know about these concerns? How do they know?	
10. Do I have procedures for dealing with complaints and problems relating to Health and Safety issues? How are those procedures communicated to my employees and customers?	
11. Are the carriers or shipping companies I use aware of and conversant with any special procedures or practices needed for shipping my product?	
12. Do these carriers and shipping companies have the safety related data I provide?	
13. Do my customers know and understand these special shipping procedures?	
14. Do my products have any special storage requirements – such as containers, environment and shelf life?	
15. Do my customers know about these storage requirements? How do they know about these storage requirements?	
16. If my product produces any waste product do I provide information and assistance on how to deal with this?	
17. Do I provide information and assistance on dealing with the final disposal or recycling of my product at the end of its life? How do I provide this information and assistance?	

SAMPLE PRESS RELEASE

NEWS RELEASE
For Immediate Release

DATE
Contact: NAME
telephone

XYZ COMPANY FOCUSES ON SAFETY WITH PRODUCT STEWARDSHIP PROGRAM

CITY, STATE — XYZ Company is reinforcing its ongoing commitment to safety with a product stewardship program that focuses on outreach to every customer that uses, transports or stores our products.

“With technologies changing so rapidly, it is critical for companies to continually revisit their responsibility to safety,” says ABC person, title. “XYZ Company always has put safety first, and we are proud to take the lead in initiating a dialogue on safety with everyone who comes in contact with our products.

Product stewardship is the safe use and handling of products and equipment at all stages of their life cycles — from design and manufacturing to distribution, use and disposal. Companies practicing product stewardship go beyond regulatory compliance. They integrate health, safety and environmental considerations into every facet of their operations, particularly their interactions with customers and vendors.

XYZ Company launched this program as part of the Entertainment Services & Technology Association’s (ESTA’s) Product Stewardship program, which gives companies tools to create their own initiatives. XYZ Company and ESTA urge purchasers to elevate the importance of safety by encouraging all bidders to have product stewardship programs.

XYZ Company is [fill in details about the company]. XYZ Company is a member of the Entertainment Services and Technology Association (ESTA), one of the world’s leading trade organizations for the entertainment technology industry.

SAMPLE NEWSLETTER ARTICLE

Sample Newsletter Article

Factoring Stewardship Into Purchasing Decisions

Price often is critical to purchasing decisions, but if it were the only consideration, we'd all be driving Yugos. In fact, when we select a vendor, we balance price and many other factors, including product quality, availability and safety.

As you determine your purchasing priorities, **XYZ Company** asks you to put safety at the top of the list. We always put safety first and ask our vendors to do the same. To help our customers better understand our companywide practices, we're formalizing them with a Product Stewardship Program.

Product stewardship is the safe use and handling of products and equipment at all stages of their life cycles — from design and manufacturing to distribution, use and disposal. It goes beyond regulatory compliance by integrating health, safety and environmental considerations into every facet of company operations, particularly interactions with customers and vendors.

Our Product Stewardship Program — which includes [list one or two specifics, e.g., outlining specific issues that will be discussed with clients and vendors at the beginning of each new project] — illustrates how stewardship is part of our day-to-day business operations. It also encourages active participation by our customers because product stewardship depends on the involvement of everyone who handles a product.

Product Stewardship in action

[If possible, give a more specific illustration of the product stewardship program here, such as: For example, when XYZ employee Jane Smith bids on a job, she includes our product stewardship statement in our bid. Once we are awarded the job, she makes sure the customer and the vendor transporting the materials have data sheets for each product, and if the product has specific storage requirements, she makes sure those are clearly understood. She also encourages her clients and vendors to ask questions and makes sure they know whom to call for additional information.]

An industrywide initiative

Product Stewardship makes our industry safer, particularly if everyone is involved. You can help by learning more about product stewardship and encouraging your vendors to have product stewardship programs. Many companies make price their top priority by awarding jobs to the lowest bidder. In the same way, purchasers can elevate the importance of safety by encouraging all bidders to have product stewardship programs.

Visit our Web site, www.xyzco.com for a complete description of our product stewardship program. For more information about formalizing or starting a product stewardship program, contact the Entertainment Services & Technology Association (ESTA), (212) 244-1505, www.esta.org.

[suggested pull quote]

Many companies make price their top priority by awarding jobs to the lowest bidder. In the same way, purchasers can elevate the importance of safety by encouraging all bidders to have product stewardship programs.

Sample Internal Company Memo

Sample Internal Company Memo

Note to Members: this is intended to assist you in informing your employees about your product stewardship program. The following can be an article or it can be tailored to be a letter from the president of the company or from the manager of the product stewardship program

XYZ Company Renews Its Commitment to Safety with Product Stewardship Program

Just as we wouldn't sign a contract without discussing price, we shouldn't move forward with a client or vendor without discussing the safety considerations for our products. This renewed focus on safety is at the heart of XYZ's new product stewardship program, launched [or announced] on xxdate. [OR which will be launched at a special seminar or meeting, to be held on xxdate.]

Product stewardship is the safe use and handling of products and equipment at all stages of their life cycles — from design and manufacturing to distribution, use and disposal. It goes beyond regulatory compliance by integrating health, safety and environmental considerations into every facet of company operations, particularly interactions with customers and vendors.

"The essential tools of our business require an ongoing commitment to safety," says ABC, title, [quote the CEO or other company officer] "While we always put safety first, this program formalizes our procedures and reminds all of us to make product stewardship part of our day-to-day business operations."

Our program, managed by _____ [give name of point person], will accomplish that by _____. [give some details of the program and what is expected of employees, such as where materials are kept, what types of information they are expected to discuss with clients, vendors or others, etc.] For example, [give example that relates to the company's specific products or equipment].

A formal description of our product stewardship program, including the vision statement and employee responsibilities has been [or will be] distributed to all employees on _____ [date]. [It also will be the subject of a staff meeting, a special seminar, etc.] If you have any questions, please contact _____.

Notes:

Notes

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 company's 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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