

## Basic Training Module Chemical Management

Example Module 6:

### Tool - Chemical Control Action Plans

<b>STEP 1: GATHER EXISTING INFORMATION</b>	
Gather the information you have collected and developed on hazards, control measures, possible risk reduction actions, and legal obligations related to the control of chemicals and costs (draw on information generated using the tools you applied in Section 1)	
<b>STEP 2: DECIDE HOW MANY CHEMICAL CONTROL ACTION PLANS YOU WILL NEED</b>	
Distinguish between one-off actions and periodic actions	
Decide if it will be more useful to create one or more than one plan. (for example, you may want to have separate plans for (i) all high priority/immediate one-off actions, (ii) normal priority one-off actions, and (iii) periodic/repetitive actions such as the ones related to maintenance, monitoring or reporting/legal obligations)	
In most organizations, obtaining senior management endorsement for one single chemical control action plan will be easier. It will also be easier to follow-up one single plan.	
<b>STEP 3: CREATE YOUR CHEMICAL CONTROL ACTION PLAN(S)</b>	
Plan(s) should contain the following elements:	
<ul style="list-style-type: none"> <li>• a list of the 'hot spots' you identified (refer to the notes you made during the walkthroughs)</li> <li>• a description of the measures that you propose for dealing with each hazard</li> <li>• a definition of clear and realistic objectives and targets that you want to achieve with this measure, indicating the anticipated improvement or benefit in terms of optimising chemical use, reducing health risks for workers, reducing environmental damage, improving product quality</li> <li>• a description of the specific activities to be undertaken to achieve the desired improvement or benefit</li> <li>• the expected costs associated with implementation of the action, taking into account investment costs, maintenance/periodical costs, labour costs</li> <li>• the person who is responsible for taking action and monitoring the results</li> <li>• the time period within which action should be completed</li> <li>• the expected results (indicates the eventual benefits achieved vis-à-vis cost savings, risk reduction, etc.)</li> </ul>	
<b>STEP 4: REVIEW YOUR PLAN FOR CONSISTENCY AND EFFECTIVENESS</b>	
<b>Review question</b>	<b>Notes</b>
Have you reviewed your plan carefully before trying to seek endorsement from senior management?	
Have you discussed draft plans with all the people that may be involved, particularly the ones that you believe should be responsible for each assigned action? In particular, try to get their pre-agreement on the deadlines you will be proposing to your senior management.	
Have you consulted the people who are directly involved in handling chemicals about the proposed actions in order to understand the implications for changing procedures?	
Have you thought about possible consequences – both positive and negative – before implementing action?	
Have you checked that the proposed actions are sufficient to meet the stated objectives and targets?	

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Have you verified that the actions to be undertaken are clearly understood by those who will be involved?	
Have you assigned clear responsibilities for each action? Give the responsibility for taking action to specific individuals. If no individual is responsible, nothing will happen!	
Have you made sure that those designated as responsible have the needed expertise and authority to carry out the proposed action?	
Have you been specific about who must do what and how?	
Have you established a realistic time-frame for who should do what by when?	
Have you made provisions in your plan so that all workers affected by changes to the current way of doing things will have an opportunity to be properly informed and trained in the new procedures?	
<b>STEP 5: GET ENDORSEMENT</b>	
Present the agreed plans to your senior management, clearly explaining the expected benefits from implementing the actions proposed.	
Prepare yourself beforehand and be ready to provide justification for each proposed action. Be particularly attentive to possible questions like:	
• Why should we implement this action now and not next year?	
• Can we partially implement this action and still obtain the expected results?	
• Are you sure of the expected range of costs?	
• Did you take into account idle time? And warehouse cost?	
• How many suppliers did you consult?	
• Will there be any overtime hours involved?	
• You will need to involve one of our permanent contractors/suppliers to implement this action. Are you taking their assistance for granted? Have you checked what extra costs will be involved?	
• Have you discussed the feasibility of this action with this person?	
• Why have you proposed him/her for the job?	
• Why are you proposing this action to start 6 months from now? We are presently non-complying. What are the costs of non-compliance with this obligation (contractual, reputational, legal) vis-à-vis the investment and operational costs of this action now? Have you taken into account potential fines, or loss of customers/orders?	
• Other: _____ (list possible questions you may be asked)	

Source: UNEP Responsible Production