



Chemistry Industry Association of Canada Association canadienne de l'industrie de la chimie

RESPONSIBLE CARE® VERIFICATION REPORT

HONEYWELL ASCA INC., AMHERSTBURG, ON

June 3, 4 2013

Disclaimer

This report has been produced by a team, convened by the Chemistry Industry Association of Canada (CIAC) to provide advice to the above company and assist it in meeting its Responsible Care commitments as a member of the Association. The material in it reflects the team's best judgment in light of the information available to it at the time of preparation. It is the responsibility of the CIAC member company which is the subject of this report to interpret and act on the findings and recommendations in this guidance document as it sees fit. Any use which a third party makes of this document, or any reliance on the document or decisions made based upon it, are the responsibility of such third parties. Although CIAC members are expected to share the results of this guidance document with interested parties, the association, its member companies, their employees, consultants and other participants involved in preparing the document accept no responsibility whatsoever for damages, if any, suffered by a third party as a result of decisions made or actions based on this report.

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EXECUTIVE SUMMARY

This report documents the observations and conclusions of the independent verification team tasked with conducting a Responsible Care Verification of Honeywell ASCa Inc., Amherstburg (Honeywell Amherstburg). The verification was undertaken on June 3 and June 4, 2013 and included a team visit to Amherstburg, ON. This was the third Responsible Care verification completed for Honeywell Amherstburg. The last verification was completed in Nov, 2010

As a result of the examination conducted, the verification team is of the opinion that the Responsible Care Ethic and Principles for Sustainability are guiding company decisions and actions, and that a self-healing management system is in place to drive continual improvement. The team believes that the company is capable of responding to the Findings Requiring Action identified during the verification - summarized below and discussed in detail in the report. The verification is complete and no further involvement is required by the verification team.

Signed: _____ Date: June 9 2013
Gerry Whitcombe
Verification Team Leader

For more information on this or a previous Responsible Care Verification Report, please contact your local company site or the company's overall Responsible Care coordinator:

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1. Introduction

1.1 About Responsible Care Verification

As a member of the Chemistry Industry Association of Canada (CIAC), the most senior executive responsible for Honeywell Amherstburg's operations in Canada attests annually to CIAC and its peers that the company's operations conform to the expectations contained in the Responsible Care Commitments and are guided by Responsible Care Ethic and Principles for Sustainability.

The Responsible Care® Ethic and Principles for Sustainability

We dedicate ourselves, our technology and our business practices to sustainability - the betterment of society, the environment and the economy. The principles of Responsible Care® are key to our business success, and compel us to:

- work for the improvement of people's lives and the environment, while striving to do no harm;
- be accountable and responsive to the public, especially our local communities, who have the right to understand the risks and benefits of what we do;
- take preventative action to protect health and the environment;
- innovate for safer products and processes that conserve resources and provide enhanced value;
- engage with our business partners to ensure the stewardship and security of our products, services and raw materials throughout their life-cycles;
- understand and meet expectations for social responsibility;
- work with all stakeholders for public policy and standards that enhance sustainability, act to advance legal requirements and meet or exceed their letter and spirit;
- promote awareness of Responsible Care, and inspire others to commit to these principles.

As an element of this commitment to Responsible Care, Honeywell Amherstburg must, every three years, participate in an external verification intended to:

- Provide the Executive Contact with an external perspective when assessing if the company is indeed meeting the intent of the Responsible Care Commitments, along with advice on areas that may require attention;
- Identify opportunities for assisting the company when benchmarking its own practices and performance against those of its peers, thus supporting continual improvement;
- Contribute to the credibility of Responsible Care amongst company personnel and stakeholders, as well as the stakeholders of the broader industry;
- Identify successful company practices that can be promoted to peers in the CIAC membership; and
- Support the identification of areas of common weakness so that collective tools and guidance can be developed to improve performance in those areas across the CIAC membership.

Verification is conducted according to a common protocol, developed by the association's members and others, including several critics of the chemical industry. The verification is conducted by a team consisting of:

- Knowledgeable industry experts with experience in Responsible Care;
- A representative of the public at large (usually with a public interest background and with experience in Responsible Care gained from serving on the CIAC's National Advisory Panel) and
- One or more representatives of the local communities where the company's facilities are located.

Once completed, the Verification Report is made publicly available through the CIAC website (www.canadianchemistry.ca). Honeywell Amherstburg is also expected to share the report with interested persons in its communities and other stakeholders as part of its ongoing dialogue processes.

Additional information on Responsible Care and/or the verification process can be found at the CIAC website www.canadianchemistry.ca, or by contacting the Responsible Care staff at CIAC at glaurin@canadianchemistry.ca or (613)292-8663 extension 233.

1.2 About Honeywell Amherstburg

The Honeywell ASCa Inc. (Honeywell Amherstburg) facility is located on the site of the former AlliedSignal facility in Amherstburg ON. This facility manufactures hydrofluoric acid that is used in the manufacture of fluorocarbons and fluoropolymers, in nuclear fuel production and in the manufacture of stainless steel and titanium.

The Amherstburg facility is part of the Performance Materials and Technologies (PMT) division which is in turn part of Honeywell International. Hydrofluoric acid from the Amherstburg facility is shipped to customers throughout North America using a fleet of company owned dedicated trailers with employee drivers as well as by rail.

There are four company divisions – Automation Control Systems, Aerospace, Performance Materials and Technologies and Transportation Systems.

The parent division, Performance Materials and Technology, is committed to Responsible Care and is a member of the American Chemistry Council (ACC).

Website:

<http://www51.honeywell.com/sm/about-us/ourvalues-details/responsecare.html?c=13>

1.3 About This Verification

The verification of Honeywell ASCa Inc., Amherstburg (Honeywell Amherstburg) was conducted on June 3 and June 4, 2013 and included a team visit to Amherstburg, ON. During the course of the verification, the team had the opportunity to interact with a range of company personnel, as well as stakeholders external to the company. Attachment 2 contains a list of those individuals interviewed and their affiliations.

This was the third Responsible Care verification completed for Honeywell Amherstburg. The last verification was completed on Nov, 2010

The verification team was comprised of the following individuals.

Name	Affiliation	Representing
Gerry Whitcombe	CIAC Verifier	Industry (team leader)
Kris Lee	CIAC Verifier	Public-At-Large
Aline Hilton	Local Community Verifier	Amherstburg Community
Debbie Krukowski	CIAC Observer	Public-At-Large

2. Team Observations Concerning the Responsible Care Commitments (Codes and benchmark and Collective Expectations)

During the verification of Honeywell Amherstburg, the verification team looked for evidence that the company was addressing the expectations documented in the Responsible Care Commitments (152 code elements plus 28 benchmark and collective expectations). While considering all aspects of the Responsible Care Commitments during the verification, the team placed an emphasis on conducting a more in-depth examination of certain company aspects identified by the company or the team. These were related to an understanding of how the Honeywell Amherstburg site is able to identify the differences between expectations of Honeywell Corporate, ACC and CIAC Responsible Care requirements and how it fulfills those commitments.

In communicating its observations, the verification team will make repeated reference to the following categories of observations:

1. **Findings Requiring Action** document instances where the verification team observes specific company actions (or the absence of company actions) which are inconsistent with the detailed codes and benchmark and collective expectations contained in the Responsible Care Commitments. Where possible, the verification team will communicate, based on their experience and judgment, why it is inconsistent and how the observation relates back to a possible gap in the expected management system and / or the ethic and principles underpinning company actions. The team may also provide advice on how the situation might be responded to.
2. **Works in Progress** document instances where the verification team has observed the company self-initiating actions in response to identified gaps and deficiency arising from other internal or external audit and review activities, or where the company has self-initiated important improvement opportunities.
3. **Successful Practices** document instances where the team believes the company has taken actions that strongly support sustained excellence in performance, and which should be communicated throughout the CIAC membership.
4. **Improvement opportunities** identify instances where the verification team has observed company actions and decision making as being largely consistent with the expectations detailed in the Responsible Care Commitments, but for which the team is of the opinion that the company could support further improvement by considering alternate or additional benchmarks when undertaking its planning and decision making.

The verification team's observations of how the company has addressed the Responsible Care Commitments are as follows:

2.1 Team Observations Concerning Operations Code

2.1.1 Design and Construction of Facilities and Equipment

New design and construction is covered by a corporate capital projects process that has three levels of applicability depending on project cost. All site new design is covered by the site's Management of Change process (MOC) (SOP-PSM-MOC-01) and Design and Quality Review (DQR) (SOP-PSM-DQR-01) process.

This area is well covered by corporate processes, however, code awareness and understanding by site responsible persons is low. An opportunity in the management system section of this report has been written to cover this observation.

The company meets Responsible Care code implementation expectations for this area.

2.1.2 Operations Activities

The company sufficiently meets Responsible Care code implementation expectations for this code area. Specific observations are given below.

a. General Considerations

The company applies the principles of U.S. Occupational Safety and Health Administration (OSHA) Process Safety Management of Highly Hazardous Chemicals (PSM) (29 CFR 1919.119) to all areas of their facility. These require process hazard analysis (PHA) to be conducted on areas handling highly hazardous materials but the company has extended that to include all operating areas. As a result non-hazardous as well as hazardous areas are scheduled for PHA's every 5 years.

In addition the company's comprehensive audit process (Self-Assessment Tool - SAT) is conducted every year, with two years of internal assessment and the third year being conducted by company auditors external to the site.

All changes are implemented utilizing the aforementioned MOC and DQR processes.

The team is of the opinion that this approach will adequately direct the company to the proper level of procedural controls for responsible operation of their facilities.

b. Laboratory Practice

The company generally has documented procedures covering code requirements, however, the team observed a weakness related to procedures for chemical storage and has presented a related finding in section 2.1.3 a) Occupational Health and Safety.

c. Transportation and Physical Distribution

The company maintains a fleet of tractor/trailers used exclusively in the haulage of its HF product. The fleet is very well maintained and the employee/drivers are well trained.

d. Maintenance

The company has a program called 'Maintenance Excellence' that manages all maintenance activities. In addition, all changes are covered by the MOC and DQR processes. All codes are adequately covered by the company's processes.

2.1.3 Safety and Security

The team is of the opinion that the company fully meets Responsible Care code implementation expectations for this code area. Specific observations are given below.

a. Occupational Health and Safety

The company has a full suite of operating procedures covering occupational health and safety. The company's corporate parent categorizes performance using a Gold-Silver-Bronze (and other) ranking. Currently Amherstburg is in the upper 70% of its comparison group putting it in the bronze category. Compared with their CIAC SHARE peer group they are currently better than the group average and in general, moving lower (improving).

The parent company is currently implementing a new company wide management system, the Honeywell Operating System (HOS) and the current structured safety program will be integrated into the new over-arching process while retaining its existing suite of excellent tools such as daily sequential functional meetings, emergency preparedness inspection forms, accident projection techniques. The company intention is to drive both ownership and accountability down to the process user level and advance sustainability via a systems based mindset.

The team observed inconsistencies from good laboratory practice (related to incompatibility) in the storage of laboratory chemicals. OP22 requires the company to have in place "a process to evaluate workplace health and safety hazards and implement suitable means to control such hazards...".

It is a finding requiring action that the company improve its processes and guideline/procedure(s) governing the storage of hazardous laboratory chemicals related to their incompatibilities

b. Process Safety Management

The company uses a Process Safety Management (PSM) system to manage this critical area of Responsible Care. The system follows the requirements of U.S. OSHA PSM and has been slightly modified to work in Canada.

c. Emergency Management

The company has an extensive documented site emergency management plan covering many internal eventualities as well as possible external events such as local flooding, tornadoes and mishaps at the Fermi nuclear facility across the river from the facility. The plan has been tested in conjunction with local first responders and the most recent garnered high praise from the local police chief for the breadth of the scenario.

The team views as a successful practice the company's effort to develop emergency plan test scenarios that include events designed to test all participating emergency responders. The company's most recent test is an example of the success of this effort.

During that exercise community representatives were invited to observe the process. This is an excellent demonstration of transparency. In future events the company may wish to include community feedback.

There is an improvement opportunity in future emergency drills to include constructive community feedback in a structured process with clear expectations of roles.

The company had two significant events in 2010 which caused the site and transportation emergency plans to be invoked.

The first occurred in March of 2010 and involved a tire fire caused by a wheel bearing failure that resulted in the scorching of the rear portion of the trailer. The incident occurred along the eastbound portion of Highway 401 near St. Thomas Ontario. All emergency procedures that were the responsibility of the driver were performed successfully and local first responders were able to extinguish the fire within 10-15 minutes of calling 911. There was no loss of containment and for the first time ever, Transport Canada ordered a transfer of highly hazardous material on an unprotected major transportation route. The transfer was completed successfully with no environmental impact and the damaged trailer was removed from site and the highway reopened. Although there was impact from the closure of a major highway the response and recovery were textbook and caused no exposures to the public or environment.

The second occurred at the facility in November, 2010, when a leak occurred in a piece of process piping. The leak had only begun when detected and the emergency response was immediate. It took about an hour after detection to sound the all-clear. During the release water monitors were deployed to knock down the leaking gas which was contained within the boundaries of the monitors. There was no off-site impact of the release. After the event a root cause analysis identified a piping geometry/materials of construction problem which was subsequently corrected.

Both these events demonstrate that the emergency plans are well understood and executed by employees.

The company meets Responsible Care code implementation expectations for this area.

d. Malicious Intent

The company has documented procedures to cover all aspects of this code area. This area is included in the testing of the emergency response plan and all areas are covered by the site SAT audit on an annual basis.

e. Critical Infrastructure/Business Continuity

The company has a comprehensive Business Continuity Plan that fully conforms to recent CIAC guidance on this topic.

f. Incident Reporting and Investigation

The company has a documented process (SOP-HSE-034) that governs this important area. It includes a broad definition of incidents and provides for follow up actions to be placed into the company's event tracking system. Some smaller incidents are placed into local databases. The process includes data analysis and examination for trending. A root cause process (SOP-HSE-073) is used for significant incidents.

2.1.4 Environmental Protection

The company meets Responsible Care code implementation expectations for this area. Specific observations are given below.

a. Emissions and Waste Reduction

Consideration of emission and waste reduction for the site is primarily handled within the MOC and DQR processes. An annual source assessment using their Emission Summary Dispersion Model (ESDM) is produced for the Ministry of the Environment and there is an annual TRA (Toxic Reduction Act) required review of five year plans for reduction, reuse, recycle or recovery.

b. Handling, Treatment and Disposal of Wastes

The company has documented procedures covering all aspects of this area (SOP-ENV-016, 017, 019; HSEMS407 and Groundwater Monitoring Program).

The company has made progress in influencing corporate departments responsible for assessing and procuring carrier services for production wastes and has recently confirmed that the facility can conduct their own assessment of carriers as part of corporate procedures.

The company effort to work with corporate service providers to formally include local performance assessments of third parties (notably waste haulers/processors) is a work in progress. This process can be adapted to include pre-vetting of contractors.

2.1.5 Resource Conservation

The parent company has aggressive goals on resource conservation. Since 2004 the company has reduced greenhouse gas emissions by 30%, has increased its energy efficiency by 20% and beginning in 2013 is pursuing corporate goals for water use reduction.

The site participates in these efforts and there are local goals for 3R (reduce, reuse, recycle) related to water, waste generation and energy.

The team is of the opinion that this area is sufficiently implemented but also believes there is an opportunity for oversight management of this area by the RC Team. This opportunity is covered in the management system section of this report.

2.1.6 Promotion of Responsible Care by Name

The team observed that the company takes advantage of many opportunities to promote Responsible Care by name. They have made use of their Community Advisory Panel, community newsletters, various presentations and community talks among other means.

The team did, however, find that not everyone (employees and security contractors) received or retained the Responsible Care message equally.

Given that this area is a never-ending challenge and that besides this section there are seven other code areas related to Responsible Care promotion the team is of the opinion that it would be to the company's advantage to create a focus area for this topic managed by the Responsible Care team. This opportunity is discussed in the management system section of this report.

2.2 Team Observations Concerning Stewardship Code

The company is served by parent company processes, conforming to the requirements of the American Chemistry Council's Responsible Care initiative, for most areas in the stewardship code. Because many of the activities covered by this code are not conducted in Canada (no R&D, no product carrier selection (company fleet), no product development etc.) there are limited opportunities for direct involvement with this segment of the product chain. Nevertheless, Responsible Care applies to company operations throughout the value chain and the company should be in a strong position to influence should the opportunity arise. The CIAC has just released its Stewardship Guide and a comparison between it and in-house processes is warranted.

There is an improvement opportunity to map all Stewardship Code codes (using the Stewardship Guide) to corporate processes for purposes of continuous improvement (influencing corporate processes) and to be able to catch future possible dilution of these processes in respect of Canadian Responsible Care requirements.

The team is of the opinion that this area needs some attention to fully meet Responsible Care code implementation expectations.

2.2.1 Expectations of Companies

a. Research and Development (R&D) Expectations (85-92)

The company does not conduct R&D at the facility and has not done a detailed review of this section. However, this area is guided by a corporate phase-gate (Design Quality Review (DQR), a component to the Management of Change process (MOC)) designed to meet stringent local requirements. Nevertheless there should be a mapping of this process opposite CIAC guidance (see above) prior to any consideration of research being done at the facility.

b. Expectations Beyond R&D (93-114)

This area is almost exclusively handled by corporate services (product development, sales, marketing, technical services etc.) and the (Canadian) company has very little direct control. There are processes in place which conform to the American Chemistry Council's (ACC) Responsible Care initiative.

The team is of the opinion that the company should seek a representative from (for instance) the technical services area to sit on the company's Responsible Care team. This is discussed in the management system section of the report.

2.2.2 Expectations with Respect to Other Parties

This area is the purview of various corporate services and as such there are limited opportunities for direct involvement. Nevertheless, pre-vetting and post-performance assessments by plant personnel of contracted services are permissible and in the context of the opportunity given above (mapping using the Stewardship Guide) initiatives in this area are desirable. During team interviews one area discussed was in relation to the enhancement of waste handler carrier-assessments, another was related to pre-vetting carriers (using the Motor Carrier Evaluation) to be able to provide the names of carriers into the selection process. (A work in progress is discussed in section 2.1.4b.)

2.3 Team Observations Concerning Accountability Code

The company has excellent processes supporting the Accountability Code and fully meets Responsible Care code implementation expectations.

2.3.1 Operating Site Communities

The company has developed excellent processes to dialogue with their community and very positive feedback was obtained from the company's Community Advisory Panel (CAP). The process is well documented (SOP-RC-001, 002; PMTHSE731) and up to date.

It is the team's opinion that the CAP is ready and willing to participate in defining more structure to their organization and also that the CAP would be an excellent resource to vet certain

community communications.

There is an improvement opportunity to create a Terms of Reference document for the CAP to include areas of responsibility such as CIAC's requirements for the community dialogue process to select the community member for the verifications.

There is an improvement opportunity for the company to incorporate CAP critique of possible communications from the company to the community.

The selection of the community representative for this verification did not proceed as effectively as expected by CIAC standards and the team encourages the company to review the protocol well in advance of the next verification to optimize full use of the diverse resources of the CAP members.

2.3.2 Other Stakeholders

The company has met with Municipal officials on a recurring basis to address buffer zone policies. Any encroachment of incompatible land use is immediately addressed through the appropriate municipal official, the proponents and Councillors.

The company regularly attends TransCAER meetings, participates in drills and acts as the lead in a regional drill for Essex County. They also work with the Environmental Alliance Committee through the CAW (Canadian Auto Workers), involved in the Detroit River cleanup.

3. Team Observations on the Company Management System

It is a requirement of Responsible Care that companies have a documented, self-healing management system or systems capable of identifying and responding to deficiencies and otherwise supporting continual improvement across all company business units, functions, and sites and as a framework for implementing the Responsible Care Commitments.

The verification team studied Honeywell Amherstburg's management system(s) and compared and contrasted the attributes of that system(s) to those of a self-healing overall management system as discussed in the CIAC Management System Guide. The verification team's related observations to the company management system(s) are as follows:

The company operates under the Honeywell Operating System (HOS) which has not completely replaced their previous system. They are registered to ISO 9001 and in the US their corporate parent is registered under ACC's RC14001. In addition they have developed a Responsible Care Management System to meet their requirements under CIAC Responsible Care. The system is documented and roles have been described.

The company's overall management system is sound, but they do not actively manage Responsible Care. By this we mean that code requirements are believed to be contained within

the HOS and that code recognition and understanding by the identified code experts is not high. The weakness that we see in the management system relates to sustainability and self-discovery of code erosion or dilution. Suggestions for improvement are given in the Plan-Do-Check-Act sections below.

3.1 Observations on the PLAN Step

During the PLAN Step of the management system, the company decides what the goals of the company are and how they will be met. In determining those goals, it is expected the company will look inward, across its operations, but will also look outward, considering the expectations of: stakeholders; regulatory requirements; relevant CIAC Responsible Care Commitments and supporting tools; and other industry benchmarks.

In considering the PLAN Step of Honeywell Amherstburg's management system, the verification team observed the following:

The company has effective planning processes in place for its corporate management system leading to goals and targets being aligned with corporate directives. However, planning for CIAC Responsible Care should be part of this process as well. In the planning stage (for the implementation of Responsible Care) the type of system to be implemented should be defined, the responsibilities and accountabilities of code experts should be defined and the organizational structure for the overall management system should be determined. The decisions made here are implemented during the Do phase.

3.2 Observations on the DO Step

During the Do Step in the management system, the company converts the decisions of the PLAN Step into action and ensures awareness and understanding by all involved. It is expected that the company will implement an organizational structure, assign responsibilities to appropriate personnel, supply sufficient training and resources to execute planned actions and develop and document standards, procedures and programs, as applicable.

In considering the DO Step of Honeywell Amherstburg's management system, the verification team observed the following:

The company is well organized from the perspective of its HOS with respect to policies, standards and procedures. However, the team feels that opportunities exist to bring the management of Responsible Care into existing structures to better distribute the workload and to collectively make progress towards identified focus areas.

There is an improvement opportunity to modify the management team structure and mandate to take a more active, visible role in managing Responsible Care.

Some suggestions are:

- reconfigure the company's management team meeting schedule to include four meetings per year where the focus is on CIAC Responsible Care matters. These meeting should include all members identified in the Responsible Care Organization document (Section 4) - this would mean the addition of those responsible for Stewardship Code elements.

- in the Section 4 document, ensure that all areas of Responsible Care are defined and that it is clear that each identified position is responsible for understanding the codes for that area and be responsible for a gap assessment of the codes related to applicable company processes.
- use this structure to collect information to allow the signing executive to complete the annual attestation exercise (Check and Act below).
- use the Responsible Care Team to manage 'focus' areas where collective management will likely bring synergies to difficult to manage areas (Plan above). Initial candidates for these areas would be 'Promotion of Responsible Care by Name', 'Expectation of Companies with Respect to Other Parties' and 'Resource Conservation'.
- ensure the gap analysis/matrix document clearly outlines which company processes meet the requirements and the intent of each code.
- use this structure to organize for subsequent Responsible Care Verifications (Plan above).

3.3 Observations on the CHECK Step

During the CHECK Step in the management system, actions carried out in the DO Step are assessed to determine if they are actually being carried out according to plan, and whether they are achieving the desired outcomes and delivering continual improvement. Here, the overall management system and components will be reviewed along with employee competences for assigned responsibilities, internal and external audits will be undertaken, incidents will be assessed to identify root causes, and performance measurement will be conducted and reviewed.

In considering the Check Step of Honeywell Amherstburg's management system, the verification team observed the following:

The company's Self-Assessment Tool (SAT) audit process is comprehensive and independent and meets all Responsible Care implementation expectations. It involves a three year cycle, the first two being internal self-assessments and in the third an external (to the facility) audit.

As part of the SAT all documents are reviewed on a yearly basis. While being clearly above the norm the team felt an opportunity related to the management of the review process was appropriate.

The review of all operating procedures on a yearly basis is a successful practice.

There is an improvement opportunity to create a master control document listing all scheduled document revisions and the status of each.

3.4 Observations on the ACT Step

During the ACT Step in the management system, the company translates the results of the CHECK Step into corrective actions for improvement. This includes revisiting the PLAN Step to decide whether changes are need to the company's stated goals or action plans, policies and procedures for achieving those goals. Considerations when examining the Act Step include

whether and how: audit and review findings are responded to; performance is communicated internally and externally; employee and contractor performance is rewarded and corrected, etc. In considering the Act Step of Honeywell Amherstburg's management system, the verification team observed the following:

The company's Act processes generally meet Responsible Care implementation expectations. Nevertheless, should the company revise its Responsible Care Team as suggested in the Do section above the team is of the opinion the company will be better positioned to be able to act in line with all Responsible Care implementation expectations.

4. Team Observations on the Responsible Care Ethic and Principles for Sustainability

Each CIAC member company is formally committed to the ethic of "*Doing the right thing, and being seen to do the right thing.*" This ethic, along with the principles for sustainability are expected to guide the company's decision making and practices. In conducting the verification, the team is looking to understand how well the ethic is understood and adopted within the company, and the degree to which the principles inform the manner in which the company does its business.

The verification team carefully observed Honeywell Amherstburg's decision making processes and actions and compared and contrasted the attributes of those with the attributes of a company guided by the Responsible care Ethic and Principles For Sustainability as discussed in the Responsible Care Commitments (Appendix E). The verification team's related observations on the company's application of the Responsible Care Ethic and Principles for Sustainability are as follows:

The company is well aligned with the Ethic and Principles for Sustainability primarily due to the parent company's "Sustainable Opportunity" position leading to a "Sustainable Opportunity Policy - Honeywell's Commitment to Health, Safety and the Environment" policy. There are ten components to the policy, together comprising the company's "commitments to health, safety, and the environment, and to creating Sustainable Opportunity everywhere we operate". The team's observations opposite CIAC's eight Ethic and Principles for Sustainability are as follows:

- *work for the improvement of people's lives and the environment, while striving to do no harm;*
The company's efforts here largely relate to their plant environment where they actively pursue water and energy conservation targets. They strive to maintain a fleet of product trailers of the highest calibre. They consciously set a standard for a responsible community employer.
- *be accountable and responsive to the public, especially our local communities, who have the right to understand the risks and benefits of what we do;*
Among the things that support this principle are a large and dynamic community advisory panel, regular communication to the public, a community newsletter and leading and participating in testing of the company and community emergency response plans.
- *take preventative action to protect health and the environment ;*

The company has implemented requirements for strict adherence to important safety practices (Cardinal Rules), has implemented strict process safety management requirements for all process areas, has comprehensive personal protective equipment requirements and has a medical surveillance program. In the community the company has purchased community notification sirens and loudspeakers to ensure notification should there be an emergency.

- *innovate for safer products and processes that conserve resources and provide enhanced value;*
The company is limited in applying this principle as the plant produces one product and all product development and/or process research is conducted by corporate. However, they do have the ability to implement safer design and conserve resources through the use of the management of change process.
- *engage with our business partners to ensure the stewardship and security of our products, services and raw materials throughout their life-cycles;*
The company actively works with their local rail carrier (ETR) and have enthusiastic participation from local police and fire, both members of the CAP, in efforts to improve the stewardship and security of their product.
- *understand and meet expectations for social responsibility;*
The company is a stable local employer and uses local products and services where it can. The site annually donates firefighting equipment to the local fire department.
- *work with all stakeholders for public policy and standards that enhance sustainability, act to advance legal requirements and meet or exceed their letter and spirit;*
The company is actively involved in CIAC leadership meeting and participates in CIAC activities that involve parliamentarians. They are active in local planning issues and are pursuing avenues to limit encroachment of buffer properties adjacent to the company facility.
- *promote awareness of Responsible Care, and inspire others to commit to these principles.*
The company is working to promote Responsible Care and has seen some very positive results. Notably, employees interviewed by the team recognized the necessity of working with the community so they recognized the hazards and what to do should an emergency occur. As this is an area of increasing focus and an opportunity is described in the management section of this report.

5 Verification Team Conclusion

As a result of the examination conducted, and in consideration of the observations communicated within this report, the verification team is of the opinion that the Responsible Care Ethic and Principles for Sustainability are guiding company decisions and actions, and that a self-healing management system is in place to drive continual improvement. The team believes that the company is capable of responding to the Finding Requiring Action identified during the verification.

The verification is complete and no further involvement is required by the verification team. .

Attachment 1: Company Response to Verification Team Report

On behalf of Honeywell Amherstburg I have reviewed this verification report. The observations and conclusions contained in the report have been discussed with the verification team.

As always we look forward to the verification process as an opportunity to improve our existing processes. This verification accomplished this and validated our beliefs that we have a good self-healing management system.

Honeywell Amherstburg will communicate the results of the verification exercise with its CIAC peers at their next meeting, and will discuss the verification results with our stakeholders, including those representing communities near our operating sites.

We will give consideration to the Improvement Opportunities identified by verification team and will assist the CIAC in communicating and sharing the identified Successful Practices to other CIAC members. Plans will be developed and implemented to respond to the Findings Requiring Action identified by the verification team. Our progress in implementing those plans will be discussed when preparing our Annual Statement of Re-Commitment to Responsible Care, and communicated to the verification team at the time of our next verification.

Vaughan Hansen
Plant Manager
Honeywell Amherstburg
9/12/13

Attachment 2: Interview Lists

A: Company Personnel Contacted During Verification Process

Name	Position	Location
Vaughan Hansen	Plant Manager	Amherstburg
Giovanni Grande	HSE Manager, RC Coordinator	Amherstburg
Kelly Ludberg	Environmental Engineer	Amherstburg
Tony Loggie	Operations Team Leader	Amherstburg
Bryant Sartor	Technical Manager	Amherstburg
Ken Tremblay	Security	Amherstburg
Dr Amy Jones	Director of Product Stewardship	Washington, DC
Claire Matlon	Global Leader of Transportation and Regulatory Compliance	Morristown, NJ
Steve Cliff	Safety Technician - JHS	Amherstburg
Paul Carver	Millwright – Maintenance – JHS	Amherstburg
Ray LeBlanc	Driver – JHS	Amherstburg

B: External Stakeholders Contacted During Verification Process

Name	Organization / Representing	Location
Aline Hilton	CAP (Community Advisory Panel) / Local Community	Amherstburg
Dino Gobbo	CAP/ Local Community	Amherstburg
Jim Renaud	CAP/ Local Community	Amherstburg
John Blyton	CAP/ Local Community	Amherstburg
Ken Worden	CAP/ Local Community	Amherstburg
Lois Martin	CAP/ Local Community	Amherstburg
Lynwood Martin	CAP/ Local Community	Amherstburg
Michael Cox	CAP/ Police Services (Deputy Police Chief)	Amherstburg
Serge Forte	CAP/ Local Community	Amherstburg
Tim Beriaume	CAP/ Police Services (Police Chief)	Amherstburg