



Chemistry Industry
Association of Canada
canadianchemistry.ca

Association canadienne
de l'industrie de la chimie
chimiecanadienne.ca



RESPONSIBLE CARE®

VERIFICATION REPORT

DUPONT CANADA

April 27 & 28 & September 12 to 14, 2011

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.

® Responsible Care is a registered trademark of the Chemistry Industry Association of Canada.



EXECUTIVE SUMMARY

This report documents the observations and conclusions of the independent verification team tasked with conducting a Responsible Care Verification of E.I. DuPont Canada Company (hereafter known as DuPont Canada). The verification was undertaken on April 26 & 27 and completed September 12 to 14, 2011. Initially it started with a team visits to the Mississauga Corporate head office for the operations planning meeting and was followed by a visit to the Ajax & Scarborough ON facilities and at the request of the company to the Pioneer R&D centre in Georgetown ON. The verification team also conducted interviews with other company personnel and as necessary external stakeholders including locations the team was unable to visit. This was the fifth Responsible Care verification completed for DuPont Canada. The last verification was completed in May 2008 and report issued in July 2008.

While considering all aspects of the Responsible Care Commitments during this verification the team placed an emphasis on conducting an in-depth examination of company aspects related to:

- In depth review of the global management system (PDCA) including the relationship (accountabilities/responsibilities) with the activities that are managed by or integrated with the US counterpart (E.I. DuPont de Nemours and Company).
- Cross reference of the codes elements and the DuPont management system to demonstrate that all Responsible care codes elements and related commitments are integrated into the DuPont's formal management structures (PDCA).
- The overall products and sites risk management process in relation with the competency leader's role in the related activities.
- The transportation and distribution activities.
- The outreach process and its applications through the multiple areas of business (6) and sites (8).
- The Sustainability and Social responsibilities activities globally and at the visited sites.
- For the visited sites, scrutinized related documentation/practices to confirm effectiveness of the management process and compliance with the codes of practice.
- At the request of DuPont Canada visit the Pioneer Georgetown, ON R&D Center to have a discussion with senior management and identify some opportunities to improve their Safety, Health and Environment (SHE) performance at the same level as the DuPont Canada SHE performance.

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 company had no Finding

Requiring Action identified during the verification. The verification is complete and no further involvement is required by the verification team.

Signed: *Marcel Émond*

Date: 2011-11-10

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:

John Foster
SHE, Product Stewardship and Sustainability Manager
Tel. # 905-982-1324
email - John.D.Foster@can.dupont.com

SUMMARY OF VERIFICATION TEAM OBSERVATIONS

Findings Requiring Action

None to be reported.

Works in Progress

It is recommended to include The Maitland and Corunna sites in the 2014 Responsible care evaluation site visits list.

Improvement Opportunities

1. The DuPont Outreach Program should be revisited to assure that at each site the immediate neighbours that could be affected by the site operations activities and especially in an emergency situations know what to do and have direct link for ongoing communication/dialogue with a DuPont responsible contact that is able to address and answer their concerns if any.
2. The Responsible Care employee training should be globally revisited because the Responsible Care ethic and principles are unevenly known by most of the interviewed employees (visited sites) especially at the floor level. In the employee training program DuPont should link their job task/responsibilities with the applicable codes of practices elements.

3. The DuPont public web site has little reference to Responsible Care and they should review their web content approach in light of promoting Responsible Care as an ongoing activity in doing business.
4. The DuPont Carrier evaluation Program despite following the CIAC protocol should systematically include in their process and practices the monitoring of the carrier government road performance records that are available by the government agencies to assess more effectively the overall carrier performance.
5. The Maitland site risks analysis was not updated for at least three yrs and should be revisited on a regular basis.
6. The Town of Maitland Fire Department had no plant site ER training and simulation for at least three yrs. DuPont should make sure that the Fire Department has all the necessary knowledge to train their fire crew to be able to respond safely and effectively especially reacting to an Hydrogen Fluoride (HF) leak.
7. The Town of Ajax Fire Crew training on the site risks and ER situation/simulation is at least two yr old and should be revisited in order to have a well trained City fire crew for their own safety and effectiveness in case of an emergency situation.
8. The Town of Ajax fire crew has not participated in a site emergency simulation in the last several years and should be done at more frequent intervals due to fire department personnel turnover and job reassignments.
9. The Performance Coating waste management approach at the customer level for an efficient waste recovery and recycling is not done systematically and it should be re-enforced to support the DuPont Sustainability effort, ensure customer efficient wastes minimisation and proper disposals.

Successful Practices

1. Dupont Canada has a comprehensive management system with a Vision, Core Values supported by corporate policies, procedures and objectives that are documented, weighted and monitored to completion supported by a sophisticated audit system to ensure compliance to all corporate and SHE standards and practices with ongoing improvement targets.
2. DuPont de Neumours has a Sustainability program to cover all activities of its business with ongoing implementation of action plans to achieve the identified 2015 quantified goals, of which DuPont Canada is an active participant.
3. DuPont has a comprehensive and rigorous approach to setting annual objectives for all activities and sites with a rigorous centralised progress monitoring and report to senior management until all activities are completed.
4. The Ajax site has an ER qualified fire crew with an ongoing training. They do several internal ER simulations per year and they maintain an excellent communication with the City Fire department

authority. The same communication approach and relationship is present also in Scarborough and Thetford Mines.

5. DuPont Canada has a systematic and well documented annual or as required MSDS review process with business leaders responsible to notify their customers of any changes.

6. DuPont has competency leaders for all SSHE activities to support sites and employees knowledge and assure corporate standards and procedures compliance. They perform multiple rigorous audits with a set schedule and a elaborate content.

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 E.I. DuPont Canada 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 are committed to do the right thing, and be seen to do the right thing.

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, DuPont must, every three years, participate in an external verification intended to:

1. 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;
2. Identify opportunities for assisting the company when benchmarking its own practices and performance against those of its peers, thus supporting continual improvement;
3. Contribute to the credibility of Responsible Care amongst company personnel and stakeholders, as well as the stakeholders of the broader industry;
4. Identify successful company practices that can be promoted to peers in the CIAC membership; and
5. 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). DuPont Canada 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 DuPont Canada

- E.I. DuPont Canada is wholly owned by E. I. DuPont de Nemours and Company (USA) with its headquarters located in Wilmington Delaware.
- The E.I. DuPont Canada head office is located in Mississauga Ontario.
- DuPont de Nemours has some 60000 employees worldwide in 90 countries along with 8500 scientists in 75 R&D laboratories in 15 countries. DuPont Canada has some 1300 employees.

- DuPont Canada offers a wide range of products and services to the following market growth platforms; agriculture and nutrition, electronics and communications, coatings and color technologies, performance materials and safety and protections. They have 4 production sites, 3 repackaging/distribution centers and 1 large R&D centre with small lots manufacturing.
- As support to the Agriculture and Nutrition platform, DuPont operates the Pioneer business, a wholly owned subsidiary. In the past, the organizing model has kept it outside the scope of DuPont Canada's CIAC undertakings. Pioneer has its own head office in Chatham ON and operates on site a large seed conditioning plant. They also have a R&D facility in Georgetown ON and several smaller satellite sites in 6 provinces. In 2012, they will bring on stream a Canola seed production facility in Wingham ON.
- Their Canadian distribution activities are outsourced to Huron (TMH Logistics) but DuPont owns the premises at Calgary, Scarborough and Pte Claire.
- The manufacturing facilities (Maitland, Ajax, Corunna) that were sold to Investa in 2004 (contract manufacturing/ Toller) were acquired back in February 2010 and are in the process to achieve corrective action plans to comply with the DuPont standards and practices and the Responsible care compliance activities.
- In 2010, they created a Canadian Corporate Sustainability team to provide guidance to support the overall (USA) corporate sustainability goals for 2015.
- The company web site can be reached at dupont.ca

1.3 About This Verification

The verification of DuPont Canada was conducted on April 26 and 27 and September 12 to 14. It included team visits to the Mississauga head office, DuPont facilities in Ajax and Scarborough ON and the Pioneer R&D Georgetown, ON site. The recently reacquired manufacturing sites from Investa (February 2010), Maitland and Corunna, were not visited during this verification. The verification team also conducted as necessary interviews with other company personnel and external stakeholders also at locations the team was unable to visit. During the course of the verification, the team had the opportunity to interact with a wide range of company personnel, as well as stakeholders external to the company. Attachment 2 contains a list of those individuals interviewed and their affiliations.

NB - DuPont has asked the verification team to visit one of Pioneer sites. Pioneer Hi-Bred is a DuPont Business and is not part of the DuPont Canada Responsible Care compliance activities. The R&D facility located in Georgetown ON. was selected. The purpose of the visit was to have the opinion of an independent observer, the CIAC verification team, to assess Pioneer SHE management procedures and practices and identify any synergies between the DuPont SHE management system, expertise and know-how that could benefit the Canadian Pioneer organization in improving its SHE practices and related activities. A verbal report was given to the DuPont Senior Management at the verification team exit meeting in Mississauga ON.

Work in Progress

It is recommended to include The Maitland and Corunna sites in the 2014 Responsible care evaluation site visits list.

This was the fifth verification exercise completed for E.I. DuPont Canada and it was completed on September 14, 2011.

The verification team was comprised of the following individuals.

Name	Affiliation	Representing
Marcel Émond	GMEE	Team Leader
Jules Bouchard	Gestion Qualbec Inc.	Industry verifier
Denis Bergeron**	AZIMUT communication et affaires publiques inc.	Public-At-Large Verifier
Andrew Poray	Ajax -Senior Business Development & Marketing co-coordinator	Community Representative

NB -** DENIS BERGERON ATTENDED ONLY THE APRIL SESSION.

2. TEAM OBSERVATIONS CONCERNING THE RESPONSIBLE CARE COMMITMENTS (CODES AND BENCHMARK AND COLLECTIVE EXPECTATIONS)

During the verification of DuPont Canada, 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. Some of these were related to:

- Relationship with US parent company re; responsibility and accountability of the business market growth platforms.
- Company changes since last verification.
- Cross reference from codes of practice articles to DuPont management procedures and practices and links authority/responsibilities with competency leaders.

- Review how corporate and sites management compliance/requirements are coordinated and addressed.
- How long term plan and annual plan/objectives are set, cascaded down to the worker and managed to completion.
- Overview of business and sites risk identification and management including PSM and sites worst and alternate case risk scenarios.
- How Key Performance Indicators (KPI) are set, monitored and managed throughout the organization.
- Global and sites Outreach management for all locations including risks, emergency plans, Community Advisory Panel (CAP), stakeholders preoccupations, etc.
- Sustainability program and Social responsibility policy and practices; corporate and sites.
- Follow up on last report identified opportunities for improvement and findings requiring actions and how they were addressed.
- Review and understanding of additional needs in light of the new elements included in the three codes of practice especially the accountability and sustainability issues.
- DuPont PDCA relationship with CROP businesses in light of Responsible care.
- Toller's/manufacturing contract management and control.
- Service providers/contractors selection and performance management.
- Management of transportation/ warehouse/distribution activities.

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

DuPont global management system overview

DuPont Canada must comply and adhere to the E.I. DuPont de Nemours Mission, corporate Core values, policies and procedures. These policies and procedures are customized as needed by the Canadian organization and sometime by site locations. There are also Canadian policies and standards that are written specifically for the Canadian business and compliance with the Responsible care codes of practice. The Competency leaders (10) are a key element of the DuPont management process mainly for safety, security, occupational health and environment activities. They are core specialist and support the businesses and sites in management effectiveness and compliance with the DuPont policies, procedures and standards. DuPont corporate staff and competency leaders conducts regular internal and external audits at least annually of all its SHE activities and sites to ensure compliance to all the policies and procedures and corrective action plans are followed up to completion. They also have senior personnel who act as competency leads/coordinator (21) for the products stewardship and the regulatory affairs.

Successful Practices

- Dupont Canada has a comprehensive management system with a Vision, Core Values supported by corporate policies, procedures and objectives that are documented, weighted and monitored to completion supported by a sophisticated audit system to ensure compliance to all corporate and SHE standards and practices with ongoing improvement targets.
- DuPont has a comprehensive and rigorous approach to setting annual objectives for all activities and sites with a rigorous centralised progress monitoring and report to senior management until all activities are completed.

2.1.1 Design and Construction of Facilities and Equipment

DuPont Canada design and engineering/construction personnel are supported by the appropriate R&D activities that led to the initial process design. The personnel has access to appropriate standards/procedures for site selection and land use planning (S25.2A), hazards and risks assessment (S21A/S25A). They have access to engineering standards for each piece of equipment. All R&D projects get tested and confirmed in a pilot test scale operations before being transferred to a commercial scale operation. Any hired construction firm has to be approved as per the DuPont standards before being put on the eligible list. Any new project has a final process safety and start up review before commissioning. Any existing process or equipment change has to follow the management of change (MOC) procedure. All steps leading to a new construction either from a pilot plant scale or MOC are documented and approved. The verification team has scrutinized several procedures during the verification process to verify compliance with some code articles.

2.1.2 Operations Activities

All operations activities are documented in a procedure and detailed as required. The key procedures are either in the DuPont Canada Health and safety manual, the PSM procedures (S21A) and the process hazards analysis (S25A). Each site must comply with the applicable corporate procedures or customized site procedures. DuPont has global and sites technical competency leaders for each key activity related to SHE and coordinator/leader for each family of product stewardship and the regulatory affairs. These individuals are responsible for the employee technical support, the activity compliance and conduct regular audits of their competency either in the business organization or at the sites. DuPont has also nominated individuals who are responsible companywide for the compliance of each element of the Responsible care codes of practice using a cross reference document. The operations activities include the process units, the maintenance activities, the laboratories, the transportation and distribution activities along with the management of the tollers and contractors as required.

DuPont management conducts periodic reviews of the business to assess key practices and procedures in SHE and PSM and compliance with the MOC procedure. The maintenance activities are structured in such a way to ensure the integrity of the facilities including critical systems and protection of personnel on and off site. The transportation and distribution includes the selection of the mode, the equipment, the carriers and verification of the performance while minimizing risks. The verification team has scrutinized several procedures and related practices to verify compliance with some code articles e.i.; transportation. They evaluate their carriers as per the CIAC protocol and according to a set schedule every two or three years depending if they haul HAZMAT or not. They either use a self assessment approach or perform a site visit but the tools used to assess the carrier performance do not always refer to the scrutiny of the government carrier performance data.

Opportunity for improvement.

- The DuPont Carrier evaluation Program despite following the CIAC protocol should systematically include in their process and practices the monitoring of the carrier government road performance records that are available by the government agencies to assess more effectively the overall carrier performance.

2.1.3 Safety and Security

Safety and Health is one of DuPont four Core values. They have several programs and procedures to ensure occupational health and safety through proper PPE and safe work procedures, hazards identification, inspections/audits and corrective action plans. They do incidents investigation on and off site with root cause finding and corrective action plans. They have a proper industrial hygiene program and medical surveillance depending on chemicals being handled. They have SHE KPIs to monitor key activities and plans for continual improvement activities/projects. Another program is the process safety management (PSM) process that provides oversight of risks assessment and identify gaps with industry benchmarks. They also have emergency response plans (ER) for each site and for distribution/transportation activities backed up by technical advisors and specialized emergency response firms. Each site maintain a close relationship with its local fire department and keep them abreast of their risk and hazards. Each site makes available a site emergency response plan to the local first responders. The verification team has contacted some local fire departments to verify the ER system effectiveness. The contacted persons confirmed the DuPont ongoing proactive and collaborative approach on risks communication and ER activities.

Opportunities for improvement

- The Maitland site risks analysis was not updated for at least three yrs and should be revisited on a regular basis.
- The Town of Maitland Fire Department had no plant site ER training and simulation for at least three yrs. DuPont should make sure that the Fire Department has all the necessary knowledge to train their fire crew to be able to respond safely and effectively especially reacting to an Hydrogen Fluoride (HF) leak.
- The Town of Ajax Fire Crew training on the site risks and ER situation/simulation is at least two yr old and should be revisited in order to have a well trained City fire crew for their own safety and effectiveness in case of an emergency situation.
- The Town of Ajax fire crew has not participated in a site emergency simulation in the last several years and should be done at more frequent intervals due to fire department personnel turnover and job reassignments.

Successful practices

- The Ajax site has an ER qualified fire crew with ongoing training and do several internal ER simulations per year and they maintain an excellent communication with the City Fire department authority. The same communication approach and relationship is present also in Scarborough and Thetford Mines.

They address security as a separate issue and have programs to assess threats of vandalism and terrorism. Site Vulnerability Assessments (SVA) are done for each site and corrective action plans are implemented. SHE and Security periodic audits are done by the competency leader and in some cases by the corporate staff.

For their large scale operations they perform study of their critical infrastructure for business continuity.

The verification team has scrutinized some audits to verify the practices and compliance to DuPont standard and procedures. It confirmed that the audit process is comprehensive, well documented and rigorous and action plans are completed as per set schedule.

Successful Practices

- DuPont has competency leaders for all SHE activities to support sites and employees knowledge and assure corporate standards and procedures compliance. They perform rigorous audits with a set schedule and a elaborate content.

2.1.4 Environmental Protection

The environmental stewardship is one of the four DuPont Core values. They have a Sustainability program with 2015 targeted reduction goals. The ultimate responsibility, goals setting and achievement, is with the VP SH&E of E.I. DuPont de Nemours (US). Their objective is to continuously reduce their environmental foot print. They integrate in all their R&D works and initial design, an air emission and wastes reduction study. They monitor all air emissions and waste generation and implement a reduction plan where feasible. They follow the 4R approach and take actions with selected projects. Some of their 2015 global objectives are to reduce the green house gas emissions by 72% from 1990 basis and have achieved 21% on 2004 basis, the water consumption by 30% (15% achieved since 2004). The air carcinogen gas emissions have been reduced by 57% since 2004. They also reduced their total energy consumption by 21% since 2004 by implementing new technologies, reduction program, etc. DuPont Canada is participating in the Corporation Sustainability effort by setting its own goals and monitoring progress to completion.

The handling, treatment and disposal of wastes are classified and they monitor the treatment/disposal methods used by their hired qualified and approved wastes contractors. They have an employee and contractor hazard communication program. All of their manufacturing plants are/will be ISO-14001 registered (LRQA) by December 2011. They have a groundwater protection plan (S1V). They investigate

all environmental incidents and implement corrective action plans. They perform periodic environmental audits at each site.

2.1.5 Resource Conservation

DuPont Canada is adhering to the E.I. DuPont de Nemours 2015 Sustainability program. The first sustainability effort and program started in the 1970s focusing on compliance followed in the late 1980's by a corporate focus on environment then in early 2000 on green gas reduction and finally in 2006, they set Market Facing goals for 2015 (Sustainability effort). This program focus on R&D for creating new products to make people safer, reducing the global DuPont environmental footprint/energy consumption by addressing the improvement through R&D in 10 categories such as green house/climate change, energy usage, material use, wastes generation, ecosystems and biodiversity, toxicological risk, use of non depletable resources, water usage, etc. Each Canadian business units and manufacturing plants has to elaborate a reduction/improvement plan to support the corporate goals. In 2010, DuPont Canada has created a Sustainability team to manage their improvement efforts with projects and action plans.

Successful practice

- DuPont de Neumours has a Sustainability program to cover all activities of its business with ongoing implementation of action plans to achieve the identified 2015 quantified goals, of which DuPont Canada is an active participant.

2.1.6 Promotion of Responsible Care by Name

DuPont Canada internally with its employees has a management system to ensure compliance to the Responsible care codes of practice and supplies them with the training and necessary tools to ensure compliance. The DuPont management system was initially in compliance with the vast majority of the codes elements. Responsible care training is part of each employee's basic training. Most of the employees have some general knowledge about Responsible care but the level of understanding is uneven. Each site produces a newsletter for the community and employees where some promotion of Responsible care is visible but it is normally focused on social, SHE and stewardship activities.

DuPont applies the Responsible care Operations code to their service providers and the Stewardship codes elements to their customers and suppliers. Discussion with some contractors on the Ajax site confirmed the practices. The team scrutinized some customer's audits, related procedures and technical visit reports to assess the stewardship practices.

As far as the external communication for the general public and other stakeholders it is not obvious that DuPont promotes the Responsible care by name and link it to their business on an ongoing activity. The name Responsible care is nearly absent of its web site except for a short article in the section of awards and recognition.

Opportunity for improvement

- The Responsible Care employee training should be globally revisited because the Responsible Care ethic and principles are unevenly known by most of the interviewed employees (visited sites) especially at the floor level. In the employee training program DuPont should link their job task/responsibilities with the applicable codes of practices elements.
- The DuPont public web site has little reference to Responsible Care and they should review their web content approach in light of promoting Responsible Care as an ongoing activity in doing business.

2.2 Team Observations Concerning Stewardship Code

2.2.1 Expectations of Companies

DuPont in its R&D activities and product development efforts has knowledgeable employees that works with documented Product Stewardship protocols, procedures and standards (S25A/S20X/S22X, etc) enhancing the management, the reduction or the elimination of hazards, the environment risks associated to people and the environment over the product life cycle. They trained their employees, contractors, customers and suppliers on their products risks and how to handle them. They empower employees to identify sales risks and eliminate them. They make available to the customers the required information such as MSDS, specific hazard and risks information as required and supply proper training. They regularly audit their customers and suppliers/tollers/carriers/distributors with a customized approach according to the product specificities. All the activities are documented. They have the same approach as far as waste reduction and minimization in the usage of their products. Their stewardship activities are included in their 2015 Sustainability plan such as increasing investment in R&D program to increase quantifiable environmental benefits for customers and consumers and increasing the making of new products and services to help people be safer globally.

The verification team has scrutinized these practices for the visited sites and have the following comments;

Successful practices

- DuPont has a systematic and well documented annual or as required MSDS review process with business leaders responsible to notify their customers of any changes.

Opportunity for improvement

- The Performance Coating waste management approach at the customer level for efficient waste recovery and recycling is not done systematically and it should be re-enforced to

2.2.2 Expectations with Respect to Other Parties

They ensure that their customers, suppliers and service providers adhere to, or be in compliance with specific policies, standards and procedures to achieve their core values in SHE activities and trained them, audit them and even cease doing business if risks, unsafe issues and unethical behavior cannot be properly managed. In general, they want their suppliers, customers and service providers to behave like them and apply the same rigor in SHE practices.

The verification team as scrutinized some training activities for service providers and customers and past audits to ensure compliance to the codes and the DuPont procedures.

2.3 Team Observations Concerning Accountability Code

2.3.1 Operating Site Communities

DuPont Canada has multiple sites that manufacture or distribute products. They have a stakeholders/tactics matrix that highlights the preferred activities for each category. They use the stewardship avenue to communicate with the media, government, customers and NGO's. For site communities they favor dialogue, newsletters, brochures and use of their web site. They have only a few sites where they have an operational CAP. They belong with other chemical industry members to the Sarnia Blue Water CAP and have a "comité consultatif des citoyens" (CAP/(CCC) since 2007 in Thetford-Mines QC. There is no evidence at the visited sites that they contacted or visited systematically their immediate neighbors to inform them about their risks, how to behave in case of an emergency situation and to promote a dialogue on their possible preoccupation and get knowledgeable about their neighbors own risk scenarios if applicable. As an example, they have a nursery and/or private schools as adjacent neighbors in Ajax and Scarborough. They have for all sites an effective outreach approach with the local first responders.

Opportunity for improvement

- The DuPont Outreach Program should be revisited to assure that at each site the neighbours that could be affected by the site operations activities and especially in an emergency situations know what to do and have direct link for ongoing communication/dialogue with a DuPont responsible contact that is able to address/answer their preoccupations if any.

2.3.2 Other Stakeholders

DuPont has a Public Affairs department responsible to liaise with their identified audience. They have identified in their personnel a responsible lead person for the Federal and Provincial contact and issues and a lead person to support the sites management in liaison with the key local stakeholders such as neighbors, municipal local officials, economic development officers, NGO's, etc). They have a documented message Architecture (level 1 to 3) and a 7-topics Stakeholders/Tactics Matrix. They favor a proactive media relations approach to generate a positive coverage about DuPont. They have an Issue and Crisis Evolution management System with a priority setting and time frame including from a site to a corporate issue.

They identify and participate in forums to discuss and find solutions to address key societal issues. They also play a leadership role in supporting the chemical industry overall competitiveness and Responsible care behavior and as advisor in new regulations. They have a Sustainability program to enhance environmental protection wherever they do business and have a Social policy and program to help several community sectors locally and around the world.

DuPont is proactive in liaison with the Municipal, Provincial and Federal authorities as situation dictates especially on general issues that affects safety, security and environmental protection. They maintain ongoing contact with local Emergency Responders where they have a manufacturing/distribution site.

At the sites level the management is supporting the United Way. Each site has a budget to further help other nonprofit organizations requiring support. They support University education and research through sweat equity and funding. They also support their employees in volunteer activities through a recognition program.

DuPont inform the general public via news releases & coverage (each week for reporters and editors), brochures and by its web site at the local and global level.

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 with a framework for implementing the Responsible Care Commitments. Please also refer to section 2.1 for the team comments on the DuPont global management system overview.

The verification team studied DuPont Canada 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:

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 DuPont Canada management system, the verification team observed the following:

DuPont Canada management system PLAN step includes a Mission statement, Core values and a Vision statement. It includes long term strategic planning for at least the next 10 yrs revised every 5yrs, an annual budget and objectives setting. E.I. DuPont de Nemours has an elaborate and comprehensive process of setting policies and procedures with approval by the Board of directors (US) cascading to the Country (Canada) authorities down to the sites management. DuPont Canada has multiple operating committees that overlook their activities and suggest guidelines and practices to achieve compliance with the DuPont standards and procedures and meet the Responsible care expectations. In addition, they have competency leaders to support the operations and sites activities while ensuring compliance to the DuPont standards and procedures. They have products stewardship coordinators to enhance support to the sale force and the customers. They have a Responsible care cross reference document (Canada) to link any necessary policies, procedures and practices to ensure compliance with each code elements and have assigned an employee to monitor and achieve codes elements compliance. They perform regular audits of all their respective business activities focusing on compliance to corporate policies and procedures in SSHE. They regularly evaluate the knowledge and performance of their customers, suppliers and service providers to ensure the safe and proper environmental handling of their products and the frequency of the process depends on the types of products. All these activities are documented. All their employees are trained for their tasks and responsibilities and their competencies are reviewed as required.

They perform multiple benchmark activities internally between their Canadian and Worldwide sites and externally of the company on related business activities/issues as necessary. They share internally (competency leaders) all worthwhile events for learning and HSE continuous improvement. The competency leaders from all regions meets at set intervals to discuss improvement plans/activities from incident/accident learning and it is documented.

They have a long term Sustainability program with environmental protection goals, a Social Responsibility program to enhance people lives on a worldwide to local basis on selected activities.

All their activities and commitments are clearly published and explained on their web site. During the sites visits the verification team took the opportunity to scrutinize some procedures and practices to confirm the Plan step effectiveness of their management system.

Some successful practices and opportunities for improvement were identified and are highlighted in section 2 of the report.

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, develop and document standards, procedures and programs, as applicable.

In considering the DO Step of DuPont Canada management system, the verification team observed the following:

They have an organization structure with clear task and responsibilities linked with the proper Canadian and/or US corporate responsible services. All their policies and procedures are documented and are available electronically as required to all employees for the achievement of their tasks and responsibilities. All their employees have a job description and their performance is evaluated and as necessary also have a career planning program. Regular operation meetings are conducted daily, weekly, monthly, quarterly as business situation dictates and key issues are reported to upper management as required. Each operations/sites have KPI's that are linked to the ones established by the US Corporation and/or the Canadian senior management. They have a Responsible Care team that is responsible for achieving compliance to the Canadian board of directors and CIAC. They have an extensive and comprehensive incident and accident reporting and investigation program/procedures with root cause finding and corrective action plan along with a continuous improvement program and the documentation is publicized and available to all their employees.

All Canadian manufacturing sites will be ISO-14001 registered by December 2011.

The verification team scrutinized several activities and documents at the head office, at the department head and sites level mainly on manufacturing, product stewardship and SHE to ensure compliance with the DO step of the management system.

Some successful practices and opportunities for improvement were identified and are highlighted in section 2 of the report.

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 DuPont Canada management system, the verification team observed the followings:

The company has an elaborate structure to support its CHECK step activities. All operating sites by December 2011 will be registered under the DuPont global ISO-14001 registration and will have to confirm annually to the Corporation their compliance with ISO-14001. The line and middle management have monthly operations and technical meetings as required to review activities, identify deficiencies and proposed action plans. On a monthly and quarterly basis reports are issued to upper management on selected activities or any important events that can affect business conducts and the Security and SHE target performance (SSHE). The competency leaders and product stewardship coordinators conduct regular SHE audits on their assigned responsibilities. The US/Canadian Corporate departments do the same to ensure policies and procedures compliance. All audit findings are followed by a report with a corrective action plan and completion schedule. All incidents on/off the job are reported, investigated with root cause finding and corrective action plan. The KPI's are monitored at all company levels to ensure follow up of continuous improvement plans/targets. Each employees on-the-job performance is evaluated depending on job type and as needed a refresher training is given in order for them to perform their tasks effectively.

The team scrutinized selected activities which are key to the step CHECK of the company management system.

Some successful practices and opportunities for improvement were identified and are highlighted in section 2 of the report.

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 DuPont Canada management system, the verification team observed the following:

The company has an effective continuous improvement process and regular feedback on corrective action plan resulting from operations meetings highlighted deficiencies, audits and multiples improvement plans. They have a structured program to communicate with their employees especially

any activities in the HSSE sectors. Management systems are audited and reviewed every three to five years by second parties (external) and internally (site) on an annual basis.

They conduct regular communication with their customers, suppliers, service providers, key stakeholders such as the municipal and provincial authorities to ensure proper information and activity coordination especially in matters related to health, safety, security and environmental protection.

All the feedback of the DO/CHECK step are used to input and improved the PLAN step in all activities from improving a procedure to identify an improvement project and modify or correct long term plan to support the Vision and the Mission statement.

The team has looked at some activities that support the ACT step including multiple internal and external audits in different competencies.

Some successful practices and opportunities for improvement were identified and are highlighted in section 2 of the report.

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 DuPont 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 Ethic and principles for Sustainability (8) are part of DuPont Management systems and approach to conduct business. They have one of the best SHE program, practices and performance in the overall global industries. They support their customers and require their suppliers, contractors and service providers to adhere to their policies and standards. DuPont has four core values and take the necessary steps to adhere to them; Safety & Health, Environmental Stewardship, Highest Ethical behavior and Respect for People. The verification team has talked to some service providers and customers and all confirmed that DuPont "Walk the Talk".

DuPont Vision is to create sustainable solutions for a better, safer, healthier life for people everywhere in the world and all their activities in doing business are along that vision.

DuPont has a Sustainability program since 1970s that was focused first on compliance and it migrated in 1989 to the "0" goal emission to be followed in the 2000s by Global Energy and Green Gas reductions. Since 2006 the E. I. DuPont de Nemours has developed Market- Facing Goals with 2015 targets to enhance their sustainability effort. Their management structure has been modified to assure the success of this initiative. In the US their VP SHE has also the responsibility of the sustainability results. In Canada, the company has put in place a "Sustainability Team" with accountability to embed the sustainability efforts into the regular business practices, also to evaluate/identify projects to support the 2015 Corporation targets. Some of the targets are to create new products (1000) so that customers and consumers using the DuPont new products will reduce worldwide 40M tons of Green gas (CO₂ equivalent), reduce by 30% their water usage in water scarce regions, etc. They want all their manufacturing plants around the world to be ISO-14001 and in Canada all their manufacturing plants will be ISO-14001 registered by December 2011.

They have a Social Responsibility program and support several nonprofit organizations like United Way. They are active in the education world at all levels and same in the health sector. If their employees want to do some volunteer work they will support them.

DuPont Canada works with Government authorities at all level to create effective legislations and regulations and is a key actor in working with CIAC to improve the credibility of the chemical industry and collaborate with the different levels of government (e.i; Town first responders).

They inspire others like suppliers, customers and service providers to commit to the Responsible Care principles but could promote more openly the awareness of Responsible Care in the general public. The later could be an opportunity for improvement and has been also mentioned in the report under section 2.3.1.

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 did not identify any Findings Requiring Action during the verification but nine (9) Opportunities for Improvement and six (6) Successful Practices were highlighted in the report and noted in the executive summary. The verification is complete and no further involvement is required by the verification team.

Marcel Émond
Verification Team Leader
CIAC

ATTACHMENT 1: COMPANY RESPONSE TO VERIFICATION TEAM REPORT

On behalf of DuPont Canada we have reviewed this verification report. The observations and conclusions contained in the report have been discussed with the verification team.

The overall process was felt to be effective in providing an overview of how our various systems, processes and standards are working together to meet the intents of Responsible Care. This complements our 2nd party audit processes which drill deeply into the specifics of the audit topic.

DuPont Canada 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. 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.

John Foster - SHE, Product Stewardship and Sustainability Manager

Wendy Tobin - Operations SHE Manager

E.I. DuPont Canada Company

November 3, 2011

Attachment 2: Interview Lists

A: Company Personnel Contacted During Verification Process

Name	Position	Location
John Foster	SHE, Product Stewardship, Regulatory Affairs, Safety & Sustainability Mgr	Mississauga
Michael Oxley	President	Mississauga
Wendy Tobin	SHE Mgr, Manufacturing Operations	Kingston
Mike Khan	SHE Manager, Ajax	Ajax
Roger Goodman	Public Affairs Mgr	Mississauga
Robert Poffley	DuPont Occupational Health Network/Competency leader	Kingston
Chris Connors	Senior Regulatory Affairs Analyst/Distribution Competency Leader	Mississauga
Al Cyr	Environmental Competency Leader	Maitland
Tim Briceland	DuPont Fire Safety Resource Canada Cluster	Kingston
Rudy Bhola	Manufacturing competency leader	Ajax
Mark Arney	Operations Security Competency Leader	Kingston
Kelly Desautels	DuPont Human Resources Mgr	Ajax
Brett Jeffs	Site Fire Safety Resources/ER Supervisor	Ajax
David D'Abachie	Ajax Site Environment Lead	Ajax

Valerie Tunstall	Product Stewardship Coordinator PC	Ajax
Matthew Ball	Product Stewardship	Ajax
Neil Telfer	Manager Distribution Centers - Huron (TMH)	Scarborough

B: External Stakeholders Contacted During Verification Process

Name	Company / Organization	Position	Location
M. Léon Bisson	Town of Thetford Mines	Fire Chief	Thetford Mines
M. David Lange	Town of Ajax	Deputy Fire Chief	Ajax