

INTRODUCTION TO DOW'S POSITION ON CHEMICALS MANAGEMENT POLICY



Based on Principles

Dow recognizes that regulatory systems vary by country. As governments select specific legislative or regulatory approaches to product safety or chemical control policies, Dow believes certain principles should be adhered to.

Dow will base its behavior on these principles which will guide its interactions with others in the supply chain, as well as shape its advocacy with governments and other external stakeholders.

Dow's Position Statement

Dow supports a consistent, coordinated regulatory environment for products at global, national and regional levels to complement industry voluntary efforts and to ensure a level playing field. Where new regulations are required, they should be based on established scientific principles that define safe conditions for use and impose requirements to assure that use is controlled within predefined safe conditions. Such a system must rely on risk assessment and risk management principles that are predictable, flexible and capable of responsibly addressing society's economic, environmental and safety requirements.

- A chemical management system should be risk-based.
- The system should screen all chemicals (new and existing) to determine further information needs in a tiered, risk-based approach.
- The system should initially leverage available information.
- The system should recognize the shared responsibilities of each party in the value chain.
- The system should promote transparency.

External Overview

The primary objectives of a chemical management system should be the safe and environmentally sound use of chemicals, while maintaining the benefits for society associated with the use of chemical products and ensuring a competitive industry. The system should also define the parameters for and facilitate the introduction of sustainable chemistry solutions into the marketplace.

Chemicals management policies should:

- Assure that public health and the environment are protected from risks associated with use and foreseeable misuse of chemicals in commerce
- Assure that the risks of chemical manufacture, distribution, use, disposal and recycle are adequately characterized; safe conditions are defined; and that appropriate measures are put in place to control potential exposures within predefined conditions for safe use and environmental protection
- Include support for appropriate enforcement to ensure compliance with requirements that protect human health and the environment and that sustain a competitive chemical industry
- Increase public confidence about the safety of chemicals
- Provide timely responses to public concerns about chemical risks





Dow's History in the Area

In announcing its 2015 Product Safety Leadership goal, Dow has committed to publicly share its views on the principles upon which product safety legislation or regulation should be based. This is consistent with its commitment to the principles of Responsible Care®, i.e., to lead in the development of responsible governmental requirements, practices and procedures that safeguard the community, workplace and environment.

Dow has a long history of commitment to safety and environmental protection, beginning with the company's founder, Herbert H. Dow, and his invention of the "bleacher's bonnet" in 1897, which was a forerunner of the respirator that is used today. His son, Willard Dow, established a company toxicology laboratory in 1934, which is one of the largest in the industry today and has been responsible for numerous innovations in chemical safety assessment and management over its nearly 75-year history.

In 1936, Willard Dow also launched a formal pollution control program and, two years later, christened a new waste water treatment plant, leading the industry to environmental protection in addition to protection of human health.

The Dow Chemical Company is also credited with first defining Product Stewardship in 1972 by then-president Ben Branch. Dow has been a leader in the development and global implementation of Responsible Care®, and is currently leading the International Council of Chemical Associations (ICCA) to new levels of world-wide product stewardship.

Dow's Actions and Commitments

- Dow has long been recognized as a leader in the development and implementation of product stewardship to ensure the safe manufacture, distribution, sales, use and disposal/recycle of its products globally.
- Dow is constructively engaged throughout the world in working with all stakeholders to develop risk-based chemicals management regulatory policy (e.g., REACH, Canadian Environmental Protection Act and Chemical Management Program, TSCA) that is workable for industry and customers while meeting societal expectations.
- Dow has volunteered, either on its own or with other chemical producers, to provide health, safety and environmental information on more than 180 chemicals as part of the High Production Volume Challenge program and other voluntary test programs globally.
- Dow has been a leader and strong proponent of the industry's Long-Range Research Initiative to ensure funding of basic toxicology and the development of environmental and exposure test methods.

Conclusion

Dow believes there needs to be a sufficient base of knowledge to define the safe and environmentally sound use of chemicals, and to ensure downstream customer and government product use within these conditions. Dow has made publicly available its principles to conduct assessments of safe and environmentally sound use conditions.

The provision of this knowledge base and continuous improvement in the safe use of chemicals is a shared responsibility among producers, distributors, users, and other stakeholders at each stage of the supply chain, and there is a legitimate role for government regulation.

For More Information

To learn more about Dow's position on chemical management, visit <http://www.dow.com/commitments>.

