

## Draft FECC proposal for BDO/GBL Voluntary Product stewardship code

The substances 1,4-butanediol (BDO) and gamma butyrolactone (GBL) are high-volume industrial chemicals used largely as intermediates in the manufacture of other economically significant industrial chemicals. Producers of BDO and GBL are committed to preventing the misuse and diversion of both chemicals for unlawful purposes. Strong product stewardship initiatives offer one of the most effective and appropriate means of helping to ensure legitimate use of BDO and GBL throughout the supply chain. To this end, producers of BDO and GBL have developed the eight voluntary product stewardship practices presented below.

### Voluntary Product Stewardship Practices to Prevent Diversion of 1,4-Butanediol and Gamma Butyrolactone

1. **Policies and procedures are documented and available.** Company personnel and contractors involved in relevant manufacturing, logistics, handling, security, and business roles have ready access to the policies and procedures. Refresher training is provided regularly.
2. **Customers are assessed for legitimacy.** The company's policies and procedures include a customer legitimacy screening process. Sales to new and prospective customers are assessed and approved by authorized management, and no sales are made to private individuals. Transactions with research institutions are examined to assess legitimate end use and risk of diversion.
3. **All customers provide end-use declarations.** End-use declarations will be obtained from all customers, should be renewed at least annually and are confirmed prior to the processing of sales.
4. **Manufacturers encourage the supply chain to implement equivalent policies and procedures.** The other members of the supply chain implement the eight voluntary product stewardship practices described in this document. Documentation should be made available to producers, so they can audit the supply chain for compliance, if necessary.
5. **Authorities are notified of suspicious orders.** The supply chain should establish processes and procedures for documenting suspicious transactions and notifying relevant authorities as necessary.
6. **Steps are taken to prevent tampering with containers and packages.** The supply chain should take appropriate steps to prevent tampering with the product during storage and shipment. The supply chain should store and ship the substances in sealed containers/packages and hold inventory in areas with limited access.
7. **Requests for samples receive due diligence.** All of the practices listed above apply to requests for samples.
8. **Policies and procedures are monitored and reviewed.** The company conducts regular, periodic internal reviews of its compliance with these practices.

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