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

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. Companies manufacturing 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. To this end, companies manufacturing BDO and GBL have developed the eight voluntary product stewardship practices presented below.

- 1. Policies and procedures are documented and available.** The manufacturing company's 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 manufacturing company's policies and procedures include a customer legitimacy screening process. Sales to new and prospective customers are 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 are renewed at least annually and are confirmed prior to the processing of sales.
- 4. The manufacturing company requires distributors to implement equivalent policies and procedures.** The manufacturing company only works with distributors that implement the eight voluntary product stewardship practices described in this document and that only sell or provide samples to legitimate end users of BDO or GBL. The manufacturing company may review distributors' records to confirm implementation, including end use declarations from distributor's customers.
- 5. Authorities are notified of suspicious orders.** The manufacturing company establishes processes and procedures for documenting suspicious orders and notifies relevant authorities as necessary.
- 6. Steps are taken to prevent tampering with containers.** The manufacturing company takes appropriate steps to prevent tampering with the product during storage and shipment. The manufacturing company stores and ships the chemicals in sealed containers and holds 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 manufacturing company conducts regular, periodic internal reviews of its compliance with these practices.

#### **Commitment to competition/antitrust law compliance**

The product stewardship practices presented in this document are voluntary and received endorsement from ICCA. Implementation of these voluntary practices should fully comply with all competition/antitrust laws.

*The global chemical industry will be widely valued and supported for its  
economic, social and environmental contributions to society*