



**Responsible Care:
A Total Commitment**

TRANSPORTATION CODE OF PRACTICE

PART 4. AWARENESS

Each member company shall have a program which enables it to respond to questions from those along transportation corridors.

This program shall include:

- key elements of the policies, standards and procedures which reduce hazards, prevent accidents and provide prompt, effective response in the event of an accident.**
- available relevant information on the hazards of chemicals and chemical products moving along the transportation corridors**
- identification of those responsible for answering questions**
- provision for participation in, and coordination with, a program the association will operate in conjunction with carriers in raising public awareness concerning transportation.**

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4.1 POLICY

The first three parts of the transportation code of practice are designed to improve actual safety performance whenever chemicals are transported. Part one assists member companies in complying with all legal requirements which affect their operations and products, as required by the guiding principles of *Responsible Care*. These principles also require companies to "ensure that operations do not present an unacceptable level of risk to the public and the environment". Parts two and three assist here by providing specific performance oriented guidelines for the prevention of accidents, and also for response when accidents do occur.

Part four of the code is concerned with two additional requirements of *Responsible Care*. These state that companies must:

- make relevant information on the hazards of chemicals available to the public on request.
- be responsive and sensitive to legitimate community concerns.

These requirements are also an essential part of the association's policy on community-right-to-know. This policy states specifically that:

- citizens in and around member company plants and warehouses have a right to know the health, safety and environmental risks associated with the manufacture, distribution and transportation of products, and the corresponding safeguards;
- communities along major transportation routes have a right of access to member companies' information on the risks associated with the products and the volume ranges of goods transported, and the accompanying safeguards.

4.2 WHAT THE CODE REQUIRES

Part four of the transportation code states that:

- each member company shall have a program which enables it to respond to questions from those along transportation corridors.



- this key program shall include:
 - key elements of the policies, standards and procedures which reduce hazards, prevent accidents and provide prompt, effective response in the event of an accident;
 - available relevant information on the hazards of chemicals and chemical products moving along the transportation corridors;
 - identification of those responsible for answering questions;
 - provision for participation in, and coordination with, a program the association will operate in conjunction with carriers in raising public awareness concerning transportation.

Most companies now recognize the need to communicate hazard information to the public. They sometimes have difficulty, however, in recognizing just what information they should provide.

The community-right-to-know policy refers to the health, safety and environmental risks associated with transportation of products, and the volume ranges of goods transported. Some of this information, of course, is similar to that which companies must tell their employees, for example under the WHMIS* regulations. There is an important difference here, however, and it is this that leads to the greatest single cause of confusion in public awareness programs. It can be expressed in one word: *viewpoint*. And because it's so important, it's useful to examine it closely before going any further. Let's look at an example.

Mysterious Chemicals Inc. operates a plant in Smallburg, producing a range of products used in the food, textile and cleaning industries. The company considers that none of its raw materials or finished products is significantly toxic or harmful. The only really hazardous materials present are laboratory chemicals used in quality control, delivered by the laboratory supply company in a small van. All employees likely to be exposed to these chemicals have been informed about the hazards, precautions and response measures, and in any case the quantities are very small and the potential exposure is slight.

The manager of Mysterious Chemicals is vaguely familiar with public concern about chemicals from the news media, but assumes that this really applies to large chemical companies and others handling really dangerous chemicals. Right?

* Workplace Hazardous Materials Information System, published by Labour Canada



Wrong! The problem here is that the manager does not recognize that the viewpoint of the public is not the same as his own. He does not realize that for some time people in his town, and in other communities nearby, have grown increasingly alarmed over the sight of huge trucks prominently bearing the Mysterious Chemicals logo, as they roll by shopping centres, schools and homes every day of the week. He does not realize that these people read about the dangers of dioxin, PCBs and other chemicals called by combinations of letters or unpronounceable names, and they associate these with his company. He does not realize they wonder about the safety of their children, about whether his employees really know what they're doing, about what will happen when one of those trucks rolls over and explodes, showering poisonous chemicals over terrified bystanders who are unable to escape.

In this example, the actual physical situation is the same for both the manager and the public. The perceptions however are very different, and depend on the viewpoint of the observer. Notice that the difference is due primarily to information or lack of it, and not to any ability to understand the chemical data. The manager assumed that the public knew, as he did, that the materials in his trucks were harmless, and in that he was mistaken.

This idea of viewpoint cannot be stressed too strongly. It is the key to understanding what information to provide, and to whom. This is why it is often useful in any awareness program to appoint an imaginative and perceptive individual to act as devil's advocate, so that the trap of internal thinking can be more easily avoided.

Those who have been involved in the CAER program, for community awareness and emergency response involving fixed sites, will immediately recognize that many of the same principles of community awareness apply also to TRANSCAER. This is true, and it is clear that a company's CAER and TRANSCAER coordinators, while they need not be the same person, must stay in close contact with each other for the combined programs to be effective.

TRANSCAER does, however, involve some distinct problems of its own which are not present in CAER, or certainly not to the same degree. This is because the communities affected by chemical transportation are much more numerous and extensive than those affected by most fixed sites, and the public concern in those communities is therefore more difficult to address and resolve.



Because of this the TRANSCAER program is designed for implementation in two ways. The first of these depends on individual member company initiative. Each company can supply information to the public and outside agencies in response to external requests; it can also play an active lead role in contacting carriers, customers, response organizations, interest groups and members of the public where there is likely to be a direct interest in the company's products or activities.

The second approach involves situations which concern more than one company, and where uncoordinated activities by the companies acting independently are likely to be counterproductive because of duplication of effort and confusion of the target audience. As with the CAER program for awareness and response around fixed sites, companies are likely to find that a joint program involving concerned members acting in cooperation is much more effective than several independent programs. Since the scope of TRANSCAER involves activities not only on a local but also on a regional or even national basis, the association is prepared to act as facilitator in helping to form regional groups and to coordinate efforts as necessary for effective implementation of TRANSCAER.

These two approaches - individual company and group/association - will now be discussed separately in more depth.

4.3 THE INDIVIDUAL COMPANY ROLE

Many TRANSCAER awareness activities can be handled independently by individual member companies. These activities can then be designed to meet the specific needs of each company and situation, providing of course that the basic requirements of the code are met.

There are two aspects to awareness activities:

response, where the company reacts to an outside stimulus such as a direct enquiry, or an event which reveals public concern about its operations;

outreach, where the company acts on its own initiative to assess public concern and deal with it before major problems develop.

Most companies are well aware of the need for outreach to sell their products, but have been much slower in using it to convince the public that their operations are safe. This is unfortunate, because frequent media coverage of chemical transportation accidents continues to build



public concern, and leads to increasing demands for action. Then, when a major event like Mississauga happens, it's too late to start an outreach program to convince people that the industry can look after itself.

Yet there's a clear trend towards outreach rather than just response to deal with problems of this nature, although some companies — and some industries — have recognized this faster than others. To illustrate this, consider plant internal safety programs.

Originally these were response based. Companies thought about safety when accidents interrupted business or employees, public concern or governments virtually forced them to act. Some companies soon found that it made more sense to do something about employee safety on their own initiative, and they also quickly found that they needed effective programs to communicate safety policies and practices to their employees.

Today no one in the chemical industry would try to run an internal safety program solely by responding to questions or demands from employees. Instead, companies base their safety philosophy on reaching out to employees and telling them about safety, and they make sure that everyone knows about it. And now they're at this point, they welcome genuine safety concern by their employees and look upon it as an opportunity rather than a threat.

This is why it's a good idea to think in terms of outreach, even in those cases where it seems at first sight to be a challenge with present resources. Many of the problems of outreach are more apparent than real, and the very spirit of outreach helps to overcome many of the communication barriers between a company and the public. Once employees are actively involved in an outreach program, response to public concern often becomes quite natural instead of something to be feared.

Here are the steps involved in setting up a TRANSCAER awareness program:

1. Identify communication needs

The easiest way to identify needs is to think first of those who are concerned in one way or another about the company's activity to transport chemicals safely, and to group these according to their function or role.

Some typical groups are:

- emergency responders
- carriers
- customers and/or operators of storage/warehouse facilities
- news media and interest groups
- general public
- employees

The communication needs for each group can then be examined by asking two basic questions: what do members of this group want to know, and what do they need to know? Before doing this, however, there are some points to bear in mind.

Want to know

This seems straightforward, but there are a few catches. First and foremost, remember the key word viewpoint throughout this exercise. This will help to identify why the information is needed, and how strong the need is.

Secondly, remember that real information needs or uses are not always expressed. In the example of Mysterious Chemicals, no one actually asked for information although the concern was there. People may not realize information is available, they may be reluctant to ask, or they may not know how.

Thirdly, recognize that the information people do ask for is not necessarily the information they actually want. "What's the flash point of this material?" might mean "How do I deal with an accident involving this?" "Is that stuff safe to handle?" could mean "Is there any risk to my family because of what you're doing?" or "How do I *know* that you know what you're doing?"

As mentioned earlier, this is where it can be useful to have an imaginative person act as devil's advocate when identifying what people want to know. Always follow up in practice, though, to be sure that this is correct.

Need to know

This also needs explanation, partly because the expression "need to know" has acquired the connotation of holding back information. Before the community-right-to-know policy many in industry felt strongly that response to public concern should be on a need-to-



know basis, but the information provided was almost the minimum they could get away with.

It may well be that some information should be withheld, if for example proprietary formulations or competitive business plans are requested. Usually, however, the need-to-know will involve supplying more information than was requested, rather than less.

There are several reasons for this. One is because the questions asked often represent just the tip of the iceberg when it comes to public concern, as mentioned above. Another is that the information requested may be all that the questioner thinks he or she needs, but to answer this and nothing more could give a false picture of the actual situation. This is particularly true when responding to questions from the news media. It also applies in many situations where the questioner intends no malice but is not familiar with the industry, the company, the material or the person answering the question.

This can be avoided by adopting a sensitive and positive attitude to communication, and by staying alert to opportunities to encourage greater mutual understanding. Opening up the discussion will quickly reveal whether the need-to-know is satisfied, or whether closer contact and additional follow-up is worthwhile.

2. Determine how to meet communication needs

Once the various target groups and their information needs have been identified, the next step is to determine how best to meet those needs. This involves establishing how to present the information needed (including where and when), and identifying who should do it.

(a) Presenting the information

Reaching all the target groups and conveying information so that it is easily understood will require a combination of methods: verbal presentations, distribution of printed material, demonstrations, training programs, etc. Different methods will be appropriate for the different groups. These are some approaches:



(i) Plant tours

These are excellent for demonstrating the way the company is run, the care it takes of its equipment, the competence of its people and the precautions for transportation safety. Demonstrations of loading and unloading facilities, checklist procedures for these operations, the quality control involved in shipping and receiving, maintenance standards for transportation equipment and the way the company responds to emergencies can be included.

(ii) Presentations on safe handling and transportation of chemicals

These are generally made offsite, with supporting slides, videos or handout material. Such presentations can effectively show the company's concern for public safety, and can give an overview of TRANSCAER for an uninitiated audience or provide detailed descriptions of program elements such as product handling or emergency response. Often demonstrations of emergency response vehicles and equipment can also be included. Providing a speakers' bureau for educational, civic and other groups is a good way to reach out into communities which might not know how to get this information. This can be useful for establishing contact with interested groups who might otherwise approach the company as adversaries.

(iii) Reviews of emergency plans and simulated training exercises

These can be used for communication with emergency response and environmental agencies, municipal officials, the news media and also the general public. Exercises can be classroom type or full scale simulations. Training can take place at other locations, or the company can host emergency response training for responders using its own training facilities. These activities are especially useful for establishing a network of personal relationships which can be invaluable when a real emergency occurs.



(iv) Audits of facilities and equipment of carriers and customers

Outreach programs to supply hazard information to carriers and customers are now well-established for most companies. Audits of transportation-related equipment and facilities, however, show that a company is serious about safety involving its products. These audits provide an excellent opportunity for TRANSCAER outreach into other industries.

(v) Response to questions

Providing a courteous, fast response service to outside questions will always be an essential part of TRANSCAER awareness, and here too there are opportunities which bring great rewards for the effort involved. Questions provide a source of feedback on the target groups and how well outreach is working. They help to establish closer contact between the company and the questioner, and the response can convey a spirit of openness and desire to help. It is often a good idea to act as a referral service for chemical-related questions, especially in smaller communities where educators and the public may not know how to get answers which someone in the industry can find out in minutes.

(b) Identify the spokespersons

Any communications program is only as good as the people who operate it, and this holds true for TRANSCAER awareness. What is needed is not so much an extensive knowledge of the subject as an ability to relate to the audience. It is counterproductive to try explaining safety to the public while using a lot of scientific or engineering jargon. They almost certainly won't understand and worse, they may suspect that the speaker doesn't know or is deliberately trying to mislead or "play games" with them.

Spokespersons, then, should be able to put themselves in the other persons' shoes, and express themselves well in language and terms the audience can easily understand. They should be able to demonstrate concern, to indicate the company's position courteously yet firmly where appropriate, and avoid disclosing confidential information. Because of these



requirements it is sometimes easier to teach the technical material to someone with the right personality than to change the personality of a technical expert, and this should be borne in mind when identifying company spokespersons.

3. Produce support materials

Support materials include those items which can be produced in advance to help in communicating information. These include printed brochures, booklets and manuals, slides, videotapes, guidelines for verbal presentations or response, lists of spokespersons and topics each will handle, copies of procedures, etc. Much of the information needed for TRANSCAER support will already be in existence, since many of the items will have been produced for prior response, outreach or other corporate activities. Again, when deciding whether to use material in a particular TRANSCAER awareness activity, ask whether it fills the communication need *from the viewpoint of the intended audience*.

Any additional materials needed can be produced once the types of program activities and the key people to implement these have been identified. The people involved will generate many of the ideas for the support material they think is needed or useful, and they will feel more comfortable when using it.

Typical subjects covered by support materials are:

- *product safety information*. Copies of MSDSs are examples, but remember that simplified versions or interpretation may be needed for the public;
- *general product information*. For customers this will be specific and detailed, but brief descriptions of the company's products and their uses in plain language are good for use with the public and non-technical audiences. In these any family or household uses should be stressed even if these are minor — it is more relevant that methanol is used in windshield-washer antifreeze than as a raw material for formaldehyde;
- *emergency response capability and procedures*. Some of this will be for reference by carriers, responders, etc., while other information may be for information or public outreach;
- *transportation activities*, describing product volumes, routes, modes of shipment and equipment, etc.;



- *company operations*, outlining activities at specific locations;
- *general company information*, describing the activities and business of the company on a national or international basis;
- *industry information*. The CCPA and other organizations can provide many useful support materials here, especially for activities related to responsible care.

Many of these materials can be combined into packages for specific purposes. Press kits for the media are an example of this, and there are many other opportunities where a handy reference package is really appreciated by the recipients.

4. Train those involved in the communication process

The importance of this is usually recognized by those directly involved in outreach, although the need for training of technical experts in the way material should be presented is sometimes overlooked.

What is essential, however, is that *all* those involved in the awareness process must know what to do, especially in response to outside enquiries. Too often companies have the people and information to respond to enquiries, but still leave a poor impression because the question gets directed to the wrong person. This can happen where the first line of contact — often the switchboard operator, receptionist, or security guard — is not aware of the correct procedure, or a key person is not available. Remember that there is no such thing as directing an enquiry to a department — it will go to a *person* in that department, who may or may not know how to respond.

Here's how to avoid this:

(i) List topics and identify all response spokespersons

To avoid confusion, typical topics should be listed and the spokespersons for each should be identified together with phone numbers and appropriate addresses. This can be done by job title or name, but the system must allow for relief persons when other contacts are not available. This applies no matter what the reason — meetings, travel, sickness, vacation — there must always be someone ready to field the inquiry, even if it means getting back later with the answer. Arrangements must also be made to handle enquiries outside



of office hours. How this is done will depend on the company and circumstances, though the same principle applies about covering for unavailability of the primary spokesperson. Also, of course, the list must be kept up-to-date.

(ii) Communicate the list

The list will serve no purpose if an enquiry is directed to someone who is unaware of its existence. Since all employees of the company are potential contacts to friends and relatives, especially when they are off duty, it makes sense to circulate or post the list so that all are aware of it. (This also helps employees to direct their own enquiries to the right person).

(iii) Give special training to all spokespersons

All persons involved in responding to enquiries must then be trained in the use of the system. This will include courtesy, directing questions to the appropriate person (and making sure enquiries are properly transferred), which information to provide and how to provide it, information which must not be disclosed and how to do this, and what type of follow-up action to take, if any. Follow-up is especially important, since it often reveals underlying concerns which may not have been expressed in the initial enquiry. These concerns can then be corrected by appropriate outreach activities.

5. Audit and evaluate

Once the system for communicating TRANSCAER is set up and operational, it will need auditing and evaluation to ensure that it is truly effective.

Auditing is necessary to make sure that the system is working as it was designed to. This is needed to control delegated outreach activities, but it is especially important in verifying that response is working as it should. People and priorities change frequently within an organization, and what worked well yesterday may fail today if the players or the rules are different. Auditing can be done by checking to see what has been done in response to past enquiries, and this is worthwhile so that employees feel that their efforts are recognized. It should also be done by arranging periodic external enquiries, in order to test the system. This is probably the best way to find how the company appears to outsiders, and can be a revealing experience.



Evaluation, to determine how effective the program is in actually achieving its goals, is needed for outreach and response, both for communication of TRANSCAER and for the TRANSCAER program itself. The feedback from evaluation is invaluable for recognizing which aspects of the program should be modified or emphasized to increase its effectiveness. It also helps a company to recognize more easily any changes or trends in the external situation which require new program goals to be established.

4.4 THE ASSOCIATION'S ROLE

First of all, it's useful to explain briefly what the CCPA is and how it works, and the association's role in promoting awareness then becomes clearer.

The association consists not just of the head office staff in Ottawa, but also of the roughly 70 member companies across Canada (the number changes from time to time). These companies elect a board to set policy and give direction, and they also provide people with special expertise to work on committees and task forces to solve specific problems. The head office staff serves to provide general administration and to coordinate the efforts of these groups.

Although the member companies are independent businesses, they have many similar interests and objectives. Convincing the public that chemicals can be transported safely is a good example of this. Yet while each company can organize a program to do this in its own community, to try doing this independently on a province - or country-wide scale would not only waste a lot of effort - it would probably lead to chaos and public confusion. After all, it was to avoid situations like this that the association was formed in the first place.

The role of the association in promoting public awareness of TRANSCAER is therefore this: it helps the member companies to work together to achieve a common goal, and it does this in two principal ways.

The first is by providing coordination for all the various activities taking place under the TRANSCAER program. The association serves as an interchange for ideas and information about TRANSCAER activities, and is often able to arrange contacts or help from resource people in other companies or organizations.



The second way the association can assist is by providing leadership in promoting TRANSCAER, especially over broader geographic areas which can be difficult for one company alone to tackle. The association can take the initiative and approach organizations representing carriers, emergency responders, transport regulators, manufacturing industries and others. It can bring these together at the seminar or policy level, building a firm commitment to coordinated action so that objectives can be achieved which are in the interests of all parties.

Unlike chemical manufacturing, the transportation of chemicals occurs in some form in almost every community throughout the nation. A single shipment can easily move thousand of miles, involving several transportation modes and a host of communities of every type. This means that if a TRANSCAER awareness program is to be truly effective on a national scale, it will need coordination of efforts on a regional and possibly local basis - much more so than with the CAER program for fixed sites. This becomes clearer with an explanation of how TRANSCAER is likely to be implemented at three levels: national, regional and local.

1. The National Level

The first steps are now being taken at the national level. The association's representatives are contacting the senior management of national organizations with an interest in TRANSCAER objectives — organizations such as federal government departments, national rail and truck carriers and transportation industry associations. The objectives of this senior level contact are to :

- provide the necessary leadership to get the program started;
- inform the organizations about the CCPA, the principles of responsible care, the transportation code and the TRANSCAER program for code implementation;
- seek expert opinion and suggestions on how best to implement TRANSCAER;
- ask for support and participation in TRANSCAER at the national, regional and local levels.

Once the key organizations have expressed readiness to support and help in TRANSCAER, the next step is to form a group to oversee and coordinate the various activities. The association is ready to arrange this and to provide guidance in meeting TRANSCAER objectives. The



group would then be able to keep member organizations up-to-date on program activities and needs, provide valuable feedback from many viewpoints, encourage contacts and cooperation at all levels and present to the public a strong feeling of concentrated action in dealing with a common problem.

This process of introducing TRANSCAER at the national level is now being started by the association's responsible care program manager, with the aid of representatives of appropriate CCPA committees, including transportation and distribution, and TEAP.

2. The Regional Level

The need for awareness activity at the regional level is much greater for TRANSCAER than it is for the CAER program, because of the nature of chemical transportation referred to previously. With CAER the association provides direction and coordinates the program nationally, but the thrust of the program is in the communities where member company plants, warehouses, research centres and disposal sites are located. There are approximately 110 such communities in Canada.

With TRANSCAER, on the other hand, there are an estimated several hundred communities with significant potential for exposure to chemical transportation accidents, and an even greater number with more moderate risk. It is clear from these figures that even if the CAER program successfully leads to effective public protection in all communities with fixed facilities, the great majority of communities will still be outside the scope and hence not directly involved in the benefits of CAER.

To attempt to guide and coordinate TRANSCAER activities by going directly from the national to the community level would be virtually impossible. Even with CAER, neighboring sites often find it more effective to join together and have a group program. And while emergency preparedness and response is based on the municipality, many of the organizations with an interest in TRANSCAER such as railways, highway carriers and regulatory agencies are themselves already operating on a regional basis. It makes good sense, then, to take advantage of these existing arrangements and encourage the development of regional TRANSCAER groups, which can then tailor many aspects of the program to suit the prevailing conditions in their areas. Such regional groups might cover, for example, Atlantic Canada or the province of British Columbia — the actual boundaries will become clearer as the program develops.



The regional groups are likely to include representatives from the regional offices of organizations participating in TRANSCAER at the national level. Regional offices of federal government departments are an example of this. Also present will be organizations from the region itself - provincial governments and agencies, or possibly representatives from specific metropolitan areas; this will again depend on the area covered by the group. The CCPA itself is likely to be represented at this level entirely by knowledgeable people from the member companies, since they will obviously be much more familiar with regional needs than will the association staff.

It's important here to recognize that the role of these regional groups includes a critical feature. Certainly it includes providing information, arranging contacts and assistance for the participants and the public in the region. It also includes the coordination of efforts among the member companies in the region and with the national group. But there is something more.

If TRANSCAER is to work, it will only do so if the principles of the transportation code are converted into *action* - and the key to this step is at the regional level. This means that the regional groups are also responsible for *leadership*; each group must take the initiative and get things rolling in its own region. This cannot be done by anyone else. In fact it is probably true to say that the key to the entire success of TRANSCAER will depend on the leadership and commitment of the regional groups.

The coordination of regional TRANSCAER activities with the overall objectives of the national program will therefore need a strong lead and direction by those representatives of CCPA member companies serving in the regional groups, since these will perform the association's role at the regional level. These representatives, who are likely to be TRANSCAER coordinators or members of CCPA transportation-related committees, will come from member companies which already have expertise in TRANSCAER-type activities or which are willing to take on this responsibility. However, these cannot be expected to shoulder the burden alone. They will need help, and in this they will be calling on other member companies in the region to do their part. Each member company is therefore expected to assist willingly in the appropriate regional program as requested by the regional group.



3. The Local and Community Level

At this level the natural overlap with many of the CAER activities at plants and other fixed sites will enable CAER concepts to be extended to nearby communities, especially along the corridors through which raw materials and finished products are moved. Where these same routes are shared by more than one company in the local area it will probably be more convenient to share the responsibility for TRANSCAER by forming a joint local group, as many companies have already done for CAER. This can apply to heavily-populated areas such as the lower mainland of British Columbia or metropolitan Toronto, but also to rural areas where companies have a common interest. These opportunities are best identified by the companies concerned or by the regional group, and the initial suggestion could easily come from either.

In Conclusion

Public concern about the dangers of chemical transportation remains high, despite the passage of increasingly stringent legislation to state what can and can not be done. Some of this concern is based on ignorance - ignorance of the actual risks involved, or the great progress made in improving safety since the major accidents of the 70's. Some is also justified, because there are unfortunately some individuals who have not yet been convinced of the need to change their ways. Awareness of TRANSCAER can do much to overcome public concern, by attacking the two foundations upon which this concern is based.

First, it can remove ignorance by spreading knowledge in its place: knowledge among manufacturers, carriers and users of chemicals, emergency responders, municipal officials, the news media and the general public; knowledge of the safety record, the precautions and the commitment to safety of those responsible for transporting chemicals; knowledge of the *actual* risks involved.

Secondly, it can help to eliminate the justification by dealing with the root of the problem at its source — those who cannot be bothered to think of anyone else's safety so long as they are able to stay in business. Through the TRANSCAER program and the accompanying code of practice, the CCPA is showing the way by establishing standards for the safe handling of chemicals and chemical products. Awareness will communicate these standards to industry, to governments and to the public alike. Their awareness in turn will eventually force the offenders to decide — *either to do the job safely, or don't do it at all!* Only then will public concern diminish, and rightly so. Only then will our efforts to communicate TRANSCAER have achieved their goal.

