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**RESPONSIBLE CARE
MANAGEMENT SYSTEM**

TECHNICAL SPECIFICATION



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Introduction

Responsible Care is the American Chemistry Council's (ACC's) comprehensive health, safety, security and environmental performance improvement initiative. ACC Member and Responsible Care Partner companies implement Responsible Care to effectively manage their operations and products and respond to stakeholder concerns.

Implementation of Responsible Care[®] is an obligation for ACC member and Responsible Care Partner companies covering their U.S. asset base as defined by the ACC's dues formula.

The ethical foundation of the Responsible Care initiative is based on the commitments American Chemistry Council members and Responsible Care Partners have made through the Responsible Care Guiding Principles. The Guiding Principles are personally endorsed by each ACC member and Responsible Care Partner company Executive Contact (e.g., CEO, President, etc) upon admission into the ACC.

Responsible Care Management System (RCMS) is an integrated health, safety, security and environmental management system based on the principles of Responsible Care and the Plan-Do-Check-Act continual improvement cycle. ACC members and Responsible Care Partners are required to demonstrate conformance to the requirements of the RCMS (beginning on page 6) or by conformance to the RC14001[®] technical specification (RC151.04) which is an alternative certification option. Conformance is determined through an independent third-party audit conducted according to ACC procedures (see www.rctoolkit.com for these procedures).

The Responsible Care Guiding Principles, the functional scope of the RCMS and/or RC14001 technical specifications, metrics and other requirements may be periodically revised to meet the evolving needs and expectations of ACC Members and Partners and their stakeholders. Information on ACC's current Responsible Care requirements can be found at www.americanchemistry.com or www.rctoolkit.com.

0.0 Management System Components

Policy and Leadership

Policy establishes an overall sense of direction and sets the principles of action for an organization. It sets the overarching goal as to the level of responsibility and performance required of the organization and against which all subsequent actions shall be judged. Responsibility for setting policy rests with the organization's senior management.

Planning

An organization shall formulate a plan to fulfill its policy. The organization shall understand its hazards, risks and impacts, both inside and outside the fence line, including those related to the organization's products. Planning is an ongoing process which can be impacted by numerous internal and external events and activities.

Implementation, Operation, and Accountability

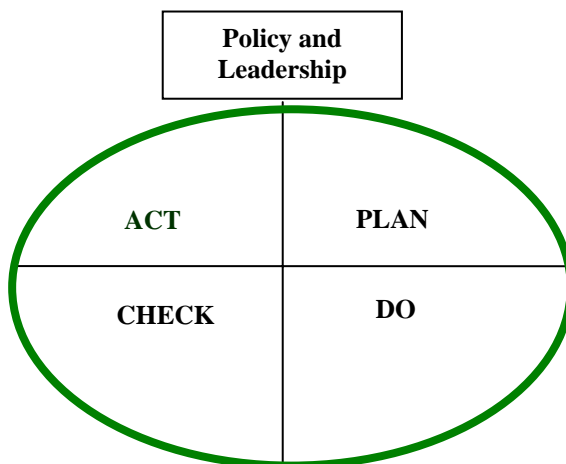
For effective implementation, an organization shall develop the capabilities, support systems and resources necessary to achieve its policy, objectives and targets. Implementation is a dynamic continual improvement process. An organization shall focus and align its people, systems, strategy, resources and structure in order to achieve its objectives consistent with the Responsible Care Guiding Principles.

Performance Measurement, Corrective and Preventive Action

An organization shall measure, monitor and evaluate its performance. There shall be a system to measure and monitor actual performance against the organization's objectives and targets. Systems shall also exist to plan and implement appropriate corrective and preventive actions.

Management Review

The organization's management shall, at appropriate intervals, conduct reviews of the RCMS to ensure its satisfactory operation and promote continual improvement. This review shall be broad enough in scope to address the Responsible Care dimensions of its activities, products or services.



Responsible Care Management System Requirements

1.0 POLICY AND LEADERSHIP

- 1.1 Senior management shall develop, document and implement a policy for the organization that recognizes Responsible Care, and shall communicate it to employees and stakeholders, including members of the public.
- 1.2 The policy shall be relevant to the nature, scale and impact of the organization's operations, products and processes.
- 1.3 The policy shall set a framework for establishing and reviewing Responsible Care goals, objectives and targets and shall include a commitment to continual improvement.
- 1.4 The policy shall include a commitment to comply with legal and Responsible Care related requirements to which the organization is subject or subscribes.
- 1.5 The policy shall promote openness with stakeholders.
- 1.6 The policy shall reflect a commitment to the Responsible Care Guiding Principles.
- 1.7 The policy shall be supported by a demonstration of visible leadership, commitment and involvement from senior management and other levels of the organization with respect to Responsible Care.

2.0 PLANNING

- 2.1 The organization shall have a system to identify and evaluate health, safety, security and environmental hazards and assess and prioritize the risks associated with:
 - a) New and existing products;
 - b) New and existing processes; and,
 - c) Changes to existing products and processes

including the distribution, transportation and use of raw materials and products, and activities associated with its operations.

- 2.2 The organization shall monitor emerging health, safety, security and environmental concerns relevant to its business and maintain current information related to hazards and risks for:
- a) Products
 - b) Processes
 - c) Activities associated with its operations
- 2.3 The organization shall have a system in place to review and determine the applicability of regulations, legislation and other Responsible Care related requirements to which the organization is subject or subscribes.
- 2.4 The organization shall have a process in place to assess stakeholder perspectives.
- 2.5 The organization shall establish Responsible Care goals, objectives and targets as applicable for:
- a) Products
 - b) Processes
 - c) Activities associated with its operations

These goals, objectives and targets shall be based upon the organization's prioritized risks, stakeholders' input and regulatory, legal and other Responsible Care-related requirements to which it subscribes. The goals, objectives and targets shall be:

- established for each relevant function;
- reflect the organization's commitment to continual improvement; and
- include timeframes and responsibilities for accomplishment.

The organization shall have a process to identify and assess program and organizational needs and to allocate resources to meet Responsible Care goals, objectives and targets.

3.0 IMPLEMENTATION, OPERATION AND ACCOUNTABILITY

- 3.1 The organization shall document its Responsible Care Management System as necessary to ensure its effective implementation, maintenance and control. Documentation shall be legible, dated, readily identifiable and available.

- 3.2 Consistent with the Responsible Care Guiding Principles, the organization shall establish and maintain systems to:
- manage its prioritized risks;
 - ensure safe operations and maintenance activities sufficient to achieve its policy, objectives, targets and programs;
 - protect the environment, conserve resources, protect worker health and create a safe and secure work environment; and
 - manage change for products, processes and activities associated with its operations, commensurate with risk.
- 3.3 The organization shall establish, document and communicate responsibilities and accountabilities to meet the Responsible Care requirements it has set.
- 3.4 The organization shall have a process in place to identify training needs and establish and maintain effective training to address Responsible Care-related job requirements.
- 3.5 The organization shall establish and maintain dialogue with employees and other stakeholders about its impact on human health, safety, security and the environment, its Responsible Care Management System performance, plans for improving the organization's performance and management of relevant risks for:
- a) Products;
 - b) Processes; and
 - c) Activities associated with its operations.
- 3.5.1 The organization shall have a process to facilitate the flow of:
- a) hazard and safe handling information along the supply chain to support risk evaluation and risk management of its products;
 - b) appropriate guidance, information and/or training requirements along the supply chain to support knowledge of the relevant risks and hazards associated with the organization's products, processes and activities; and,
 - c) for receiving such information from suppliers on goods and services used by the organization.
- 3.5.2 The organization shall have a process to make product stewardship information publicly available.
- 3.5.3 The organization shall participate in mutual assistance programs and sharing activities as embodied in Responsible Care.

- 3.6 The organization shall involve employees in the development, communication and implementation of Responsible Care programs. The organization shall have a system to recognize the Responsible Care performance of employees.
- 3.7 The organization shall establish and maintain procedures to respond to accidents and emergency situations, and for preventing and/or mitigating the impacts that may be associated with them. These procedures shall include:
- a) appropriate consideration of communications and community recovery needs;
 - b) appropriate participation in the development, implementation and maintenance of community emergency preparedness plans; and,
 - c) an appropriate process for responding to raw material, product, process, waste material and transportation incidents.

The organization shall periodically test these procedures where practical.

4.0 PERFORMANCE MEASUREMENT, CORRECTIVE AND PREVENTIVE ACTION

- 4.1 The organization shall regularly monitor and measure key characteristics of its operations, products and activities that can have a significant effect on health, safety, security and the environment. This shall include the recording of information to track performance, relevant operational controls and conformance with the organization's Responsible Care goals, objectives, metrics and targets.

The organization shall use relevant measures and records to analyze health, safety, security and environmental and other Responsible Care performance and trends.

- 4.2 The organization shall periodically evaluate its compliance with relevant health, safety, security and environmental legislation and regulations.
- 4.3 The organization shall periodically evaluate the effectiveness of its Responsible Care Management System to determine whether or not it has been properly implemented and maintained. Information on the results of the evaluations shall be provided to management.

- 4.4 Commensurate with risk, the organization shall have a process to qualify and periodically review carriers, suppliers, distributors, customers, contractors and third-party providers based on Responsible Care or other health, safety, security and environmental performance criteria.
- 4.5 The organization shall periodically evaluate the effectiveness of its communications programs with its stakeholders.
- 4.6 The organization shall:
- a) identify and investigate:
 - incidents and accidents relating to its products, processes and activities associated with its operations; and,
 - instances of nonconformance with the Responsible Care Management System.
 - b) identify root causes;
 - c) address and mitigate any adverse impacts;
 - d) initiate and complete corrective and preventive actions; and
 - e) share key findings and associated corrective and preventive actions with relevant internal and external stakeholders.
- 4.7 The organization shall establish and maintain procedures for the identification, maintenance and disposition of relevant Responsible Care records, including training records, and results of audits and reviews.

5.0 MANAGEMENT REVIEW

- 5.1 Senior management shall periodically review its Responsible Care Management System and take action to ensure its continuing suitability, adequacy and effectiveness. This review shall address the possible need for changes to policy, goals, objectives and other elements of the Responsible Care Management System, changing circumstances and the commitment to continual improvement.

Appendix 1 - Definitions and Interpretive Notes

Definitions

Activities Associated with Operations – A term referring to manufacturing activities outside of traditional manufacturing processes. For example, a manufacturing process might be a batch production operation, while activities associated with that operation might include maintenance (planned, required, emergency, routine, and preventive/predictive), housekeeping, training, and other non production-specific actions.

Carriers – Companies associated with the transport of products or raw materials. These may include railroads, marine transport, air, bulk trucks, standard freight trucks, less-than-truckload (LTL) shipments, and, in some instances, pipeline.

Contract Manufacturers – See “Toll Manufacturers” below.

Contractors – A broad category that addresses companies associated with operations to assist the organization. Plant Contractors may include maintenance, construction, operations, security, landscaping, facility upkeep, janitorial, and a number of other functions. Organizational Contractors may also include consultants, administrative, accounting, and a number of other functions.

Customers – Sometimes identified as “direct product receivers” in the Responsible Care Codes of Management Practices, Customers refer to those entities that the organization directly sells its products to.

Distributors – These companies are used by the organization to sell its products to multiple Customers.

Facilitate the flow of information – Develop dialogue and working relationships with suppliers, customers, and others in relevant value chains, including two-way communications between producers and downstream customers.

Hazard – Source of or situation that could result in harm in terms of human injury or ill health, damage to environment, property or the workplace or a combination of these.

Nonconformance – Any deviation from planned activities within a management system. For example, if the plant’s incident tracking system requires health and safety incidents to be recorded in a database within 48 hours of the occurrence, any incident that was not recorded or recorded after 48 hours would be considered a Nonconformance.

Risk – Combination of the likelihood and consequence(s) of a specified hazardous event occurring.

Prioritized Risks – Arranging or addressing risks in order of importance.

Product stewardship information - Information elements that may be made publicly available include, but are not limited to:

- Chemical identity (or category description)
- Uses - applications, functions
- Physical/chemical properties
- Health effects
- Environmental effects
- Exposure - exposure potential
- Risk management - recommended measures

Other elements that might strengthen a company's stewardship message, may also be included.

Responsible Care – An international environment, health and safety performance improvement initiative of the chemical industry. Responsible Care is based on the concepts of continual improvement and openness in responding to the concerns of stakeholders about the industry's operations and products. In the United States, Responsible Care is implemented by the member and Partner companies of the American Chemistry Council (ACC). ACC also includes a focus on security of manufacturing plants, the chemical supply chain and IT/cyber activities.

Senior Management - At a minimum, Senior Management of the organization should be defined as the ACC Executive Contact; unless the Responsible Care Coordinator is the Executive Contact, in which case the organization should identify someone else as Senior Management. Senior management should have broad responsibilities in the company, typically over multiple businesses and product lines.

At a plant site or a smaller company, Senior Management might be the plant manager or the Operations/Divisional Vice President to which the plant manager reports.

While the definition of Senior Management may vary slightly from company to company, it should be clear that Senior Management is the person or persons with significant responsibility and authority concerning the organization's operations.

Stakeholders – Person or persons impacted or potentially impacted by the organization's operations. These may include employees, stockholders, neighbors, emergency responders, other industries, competitors, commercial partners, public at large, NGOs, regulators, and anyone else with a personal stake in the organization's operations.

Suppliers – Most typically defined as providers of raw materials needed for the company's production operations. This can also be defined as providers of maintenance

chemicals, equipment, and, in some cases, services. For this reason, some companies define Contractors as a sub-category of Suppliers.

Third Party Providers - Any company associated with an organization's activities that do not clearly fall into the above categories. These may include warehouses, terminals, agents, logistics providers, etc. Other examples of third-party providers include, but are not limited to:

- Toll Manufacturers (Tollers) – Sometimes called Contract Manufacturers, these are companies employed to manufacture all or a portion of a company's products and/or process a finished product in some way. For example, a Toller may provide full production assistance to address a short-term capacity issue or it may provide bagging service for a finished product manufactured in bulk.
- Waste Disposal Contractors – A sub-category of Contractors associated with handling and disposal of an organization's wastes. Waste Disposal Contractors include landfill operations, hazardous waste disposal facilities, waste hauling services, tank cleanout, and other functions associated with waste.

Interpretive Notes

Policy Section (1.0) – An organization is not required to include the words “Responsible Care” in its policy statement. ACC strongly encourages its members to use the term “Responsible Care” in its policy, but this is not required. Examples of acceptable alternatives include but are not limited to: policy using the term “health, safety, security and environment” in lieu of Responsible Care; or separate policies covering different disciplines. This second example may be prevalent for security which may not be linked to the company health, safety and environmental policy.

Policy Section (1.6 – “reflect”) – The organization's policy shall address key concepts found in the ACC Responsible Care Guiding Principles. There is no requirement that the Guiding Principles be included “verbatim” in an organization's policy.

Appendix 2 – References and Resources

A number of Responsible Care practitioner tools and references are available. Helpful documents can be found on www.responsiblecaretoolkit.com. Supporting documents and other useful information on the website include

- Security Code and Security Code Implementation Guidance Documents
- RCMS Implementation Guidance (RC102)
- RC14001® Technical Specification (RC151)
- RC14001 Implementation Guidance (RC152)
- Responsible Care Certification Procedures (RC201-206)
- Approved Auditing Companies
- Approved Auditor Training Organizations
- General Responsible Care implementation information

ACC member and Responsible Care Partner Company performance data (mandated reporting) can be found at www.americanchemistry.com. This website also includes information on the American Chemistry Council.

Other sources of useful information include:

www.anab.org

www.beac.org

www.rabqsa.com

DOCUMENT CONTROL

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Written By:	Responsible Care® Management Systems Team (2003)	<u>Steve Kemp for Team</u>	8/15/03
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Distribution:

REVISION LOG

REVISION NO:	REASON FOR CHANGE(S):	DATE:
00	Original issue	8/15/03
01	<i>Revisions to Elements 2.1, 2.2, 2.5 and 4.1 to provide greater clarity for participants on issues relating to hazard and risk identification. Glossary updated with new terms. Notes section added.</i>	1/25/04
02	Revised document numbering to conform to changes in entire RC Certification Procedures series	3/9/05
03	Revised to: address increased stakeholder concerns regarding product and product stewardship issues, addition of emergency response language, eliminate specific references to Responsible Care Guiding Principles in element 3.2. Changes to definitions/glossary to reflect changes in requirements. Introduction section modified.	2/29/08