RESPONSIBLE CARE® MANAGEMENT SYSTEM (RCMS)

Requirements

February 2019

1. INTRODUCTION

Responsible Care® is the global chemical industry's comprehensive safety, health, environment (SHE) and security performance improvement initiative. It is adopted, implemented and maintained by chemical associations along with their member companies to continually improve SHE and security performance of their operations and products in a manner responsive to the concerns of the public.

Responsible Care® was developed as a model for the management of chemicals by the Chemistry Industry Association of Canada (CIAC) in 1985 and has since been adopted by chemical associations in more than 60 economies. Responsible Care® is the basis of significant cultural change within the chemical industry which leads to improved performance and new levels of dialogue with the public about issues of mutual concern.

The global chemical industry has embraced Responsible Care® because it is viewed as "good citizenship" with a positive impact on companies' performance, and competitiveness. For the individual company, implementation of Responsible Care® leads to improved efficiency, lower SHE and security costs as well as improved relations with stakeholders. For the global chemical industry, successful implementation of Responsible Care® demonstrates an appropriate policy which protects its public licence to operate and its ability to innovate and meet society's demands for its products. For the public, successful implementation of Responsible Care® ensures that the chemical industry will continue to provide beneficial products to society and continually reduce its impacts, while maximising its positive contributions to human health and safety, the economy and environment.

The chemical industry appreciates input pertaining to the management of chemicals from the public and other stakeholders to include in the development of policies and programmes. As the Responsible Care® network continues to expand to new regions, countries and companies, capacity building has been fostered, SHE and security information shared and an increasingly rigorous system of checklists, Key Performance Indicators (KPIs) and verification procedures are being employed. Through Responsible Care®, companies commit to go beyond self-assessment and adopt performance verification processes by external parties. While some associations have introduced mandatory third-party verification of company performance, others partner with Governments to validate performance. With effect from September 2004, self-assessment has been replaced by mandatory third-party verification of all Responsible Care® signatories in South Africa, using CAIA approved Audit Guidance Documents (AGDs).

Auditing a Responsible Care® Management System (RCMS) by CAIA approved auditors verifies that a company has implemented the elements of Responsible Care® to a certain defined level. An RCMS audit results in the issuance of a certificate and is only open to Responsible Care® signatories. Responsible Care® is implemented through a management system approach that offers an integrated structured method based on the internationally accepted elements of Plan-Do-Check-Act. With a formalised sustainability management system such as the RCMS, companies will be in a position to turn their sustainability vision into real results. As a Responsible Care® signatory, the company will be expected to:

- **PLAN** - that is, identify, assess and evaluate potential hazards and risks associated with products, processes, distribution and other operations. The company shall establish goals and objectives to address any significant hazards and risks, taking into consideration the concerns of their employees, communities, customers, suppliers and other stakeholders.
- **DO**, or implement what has been planned. The company shall establish, document and communicate responsibilities to meet their stated goals and objectives. This includes creating processes to identify and meet staff training needs on performance-related job requirements. Communicating with employees and other stakeholders is essential.

- **CHECK** progress. This stage highlights performance measurement and corrective action. Activities include self-assessments, in which the company regularly measure and evaluate performance including compliance with regulatory and legislative requirements. The company shall also take corrective and preventive action to make the necessary adjustments. In addition, the company shall establish procedures for the identification and maintenance of Responsible Care® records.
- **ACT**. Senior executives periodically review the continuing suitability, adequacy and effectiveness of the RCMS and make any necessary changes to enhance performance. The results of this process are shared with relevant stakeholders.

Signatories eligible for RCMS certification shall be audited against the requirements in ten key areas, namely:

- Management commitment
- Shareholder engagement
- Product stewardship
- Process safety
- Storage and transportation
- Pollution prevention
- Resource efficiency
- Health and safety
- Emergency response
- Security (under development)

Companies can align and integrate the RCMS with other SHE management systems such as ISO 45001, ISO 9001, ISO 14001 and OHSAS 18001 into one Business Operating System (BOS) to ensure that implementation of the third-party verification process is cost-effective, efficient and avoids the creation of dueling management systems and/or administrative conundrums. Furthermore, it is worthwhile to note that ISO 45001 is aligned with ISO 9001 (Quality Management), ISO 14001 (Environment Management) and builds on OHSAS 18001, which is a framework aimed at controlling risks. It is the responsibility of signatories to the Responsible Care® Initiative to align and integrate the RCMS to other SHE-related management systems.

2. BENEFITS OF IMPLEMENTING RESPONSIBLE CARE®

2.1 **Encourages excellence** - The RCMS has a broad set of requirements that drives a company to achieve performance excellence in the areas of SHE and security. Implementing the Responsible Care® Initiative ensures the safe use of chemicals throughout the value chain to protect users and customers.

2.2 **Increased organisational operating and cost efficiency** - The RCMS provides a method to integrate safety, environmental, security and health performance thereby improving efficiencies of the separate processes and systems. Through reduction of incidents and damage to the environment, the Responsible Care® Initiative brings an efficiency advantage, in the long term.

2.3 **Competitive advantage** - Implementing the RCMS can lead to competitive advantage due to greater performance across areas of SHE and security. The Responsible Care® Initiative goes beyond meeting legislative and regulatory requirements. Responsible Care® represents superior SHE, product stewardship and value chain performance, combined with robust stakeholder engagement, a combination not provided by ISO certification.

2.4 **Encourages teamwork** - The RCMS implementation process encourages teamwork through the definition of how the different management groups in a company interact.

2.5 **Stakeholder involvement** - Implementing the RCMS allows companies to engage relevant stakeholders to improve stakeholder relations, generate feedback and reinforce credibility.

2.6 **Emergency Response** – Implementing the RCMS gives companies recognition around the world in terms of emergency preparedness, enhancing business.

3. APPLICABILITY OF THE RCMS REQUIREMENTS

The RCMS requirements shall apply to:

1. RCMS auditors.
2. Responsible Care® signatories.
3. CAIA.
4. All businesses, operations and facilities/sites of a Responsible Care® signatory that are considered to be in its turnover calculation for its CAIA membership, are subject to this procedure.

These requirements do not apply to a Responsible Care® signatory's joint ventures or similar entities where the signatory does not exercise controlling interest. CAIA reserves the right to clarify to which facility these requirements apply.

4. TERMS AND DEFINITIONS

4.1 RCMS Audit Cycle

Three-year intervals established by CAIA, during which Responsible Care® signatories shall fulfil their RCMS audit requirements.

4.2 RCMS Audit Requirement

Third-party verification of the RCMS, where a CAIA approved external auditor performs an RCMS audit at the Responsible Care® signatory's facility/site.

4.3 CAIA Approved RCMS Auditor

An independent auditor who is employed to conduct RCMS audits. CAIA approved auditors are certified by CAIA.

4.4 Facility/Site

For purposes of this document, a facility/site is defined as a location falling under a Responsible Care® signatory's turnover calculation submitted to CAIA, where the company manufactures or sells products and/or services.

4.5 Headquarters

For purposes of this document, the headquarters is where the administrative functions of the RCMS are managed and directed for the organisation being audited/certified.

4.6 RCMS

This term refers to a comprehensive SHE and security management system whose requirements are defined in this document.

5.   RESPONSIBLE CARE® GLOBAL CHARTER (RCGC)

The RCGC was initially developed by the International Council of Chemical Associations (ICCA) in 2005 and was officially launched during the International Conference on Chemicals Management (ICCM) in February 2006 in Dubai. The Charter goes beyond the original elements of Responsible Care® since its inception in 1985. It focuses on new and important challenges facing the chemical industry and society, such as public dialogue over sustainable development, effective management of chemicals along the value chain, greater industry transparency, broader global harmonisation and consistency among the national associations. The elements of the RCGC were as a result of the evaluation of the chemical industry practices and performance that has evolved since the mid-1980s and the consideration of the recommendations of independent stakeholders (SustainAbility Stakeholder Survey: February 2004).

In 2014, the RCGC was revised and updated to respond effectively to current stakeholder expectations, as well as the opportunities and challenges facing the global chemical industry. It now focuses on the roles, responsibilities and accountabilities of global chemical companies in support of Responsible Care®. The RCGC has six elements that are consistent with ICCA policies and the Responsible Care® Initiative's original features.

CAIA encourages all Responsible Care® signatories, in particular, the multinational companies that have their headquarters based in South Africa to declare their support and adopt the fundamental features of the RCGC. The *International Council of Chemical Association's Responsible Care® Global Charter* and *Your Guide to the International Council of Chemical Association's Responsible Care® Global Charter* can be downloaded **HERE.**

6.   CAIA'S GUIDANCE TO THE ICCA RCGC IN SOUTH AFRICA

The *International Council of Chemical Association's Responsible Care® Global Charter* and *Your Guide to the International Council of Chemical Association's Responsible Care® Global Charter* are documents of external origin referenced in the RCMS Requirements document for South Africa. External documents referenced for use within the RCMS will be reviewed for context by CAIA to determine their applicability. CAIA has adopted the *Your Guide to the International Council of Chemical Association's Responsible Care® Global Charter* document, reviewed it for South Africa's chemical and allied industries and has modified the six elements as described herein.

Signatories to the RCGC commit to actively strengthen Responsible Care® worldwide by dedicating their company, employees, technologies and business practices to the following six elements:

1. A **Corporate Leadership Culture** that proactively supports safe chemicals management through the global Responsible Care® Initiative.

    RCGC signatories shall commit to provide leadership and resources to:
    - Implement Responsible Care® principles and practices wherever the company manufactures or sells products and/or services;
    - Participate in national Responsible Care® programmes where the company manufactures or sells products and/or services;
    - Contribute to the further expansion of Responsible Care® in other regions where the company manufactures or sells products and/or services;
    - Promote awareness of Responsible Care®;
    - Provide practical support and share best practices to enable members to successfully implement Responsible Care®.

2. **Safeguarding People and the Environment** by continually improving the SHE performance and security of facilities, processes and technologies and by driving continual improvement in chemical product safety and stewardship throughout the supply chain.

    RCGC signatories shall commit to*:*
    - Implement corporate principles, policies and procedures to safeguard employees, contractors, the public and the environment;
    - Strive for continual improvement with respect to workplace health and safety, public safety, process safety, environmental performance and the security of the company's facilities, products and services.

3. **Strengthening Chemicals Management Systems** by participating in the development and implementation of lifecycle-oriented, science- and risk-based chemical safety legislation and best practices.

    RCGC signatories shall commit to manage the safety of chemical products in accordance with the expectations of the ICCA Global Product Strategy (GPS), including:
    - Active collaboration in the development and implementation of effective, risk-based chemicals management policies, regulations and performance standards;
    - Active participation in capacity building initiatives to advance the safe management of chemicals where the company manufactures, sells products and/or services;
    - Contributions to national and international education and research that advances understanding of the safe management of chemicals.

4. **Influencing Business Partners** to promote the safe management of chemicals within their own operations;

    RCGC signatories shall commit to:
    - Drive continual improvement in product safety and stewardship processes and management;
    - Provide information and assistance to enable safe chemicals management along the value chain;
    - Collaborate with chemical users on maintaining and improving processes for the safe and effective management of chemicals;
    - Champion Responsible Care® along the chemical and allied industry value chain.

5. **Engaging Stakeholders**, understanding and responding to their concerns and expectations for safer operations and products and communicating openly on performance and products.

RCGC signatories shall commit to:

- Engage stakeholders to understand and respond to their concerns and expectations about chemical management across the value chain;
- Provide stakeholders with company performance and product safety information;
- Provide performance information to national and international Responsible Care® organisations to facilitate effective dialogue with the industry's stakeholders.

6. ***Contributing to Sustainability*** through improved performance, expanded economic opportunities and the development of innovative technologies and other solutions to societal challenges.

   RCGC signatories shall commit to:

- Implement corporate principles, policies and processes to drive continual improvement in waste management, greenhouse gas emissions and the efficient use of resources including energy, raw materials and water;
- Promote the importance of chemicals in improving quality of life and contributing to sustainable development;
- Participate in initiatives which confirm Responsible Care® as a contributor to sustainable development and encourage others to make their own contributions to sustainability.

7. RCMS CERTIFICATION STEPS

Commitment to the Responsible Care® Initiative begins at the highest level of the organisation and filters across a company's functional areas to each and every employee.

7.1 Signing the Declaration

When a company voluntarily signs the Responsible Care® Declaration, the Senior Executives commit the company to do a number of things to ensure continual improvement and ethical SHE and security practices at their sites.

It is at this point that Responsible Care® signatories may make use of the Responsible Care® logo subject to CAIA's usage criteria.

7.2 Appointment of the Responsible Care® Management Representative (RCMR)

Once a company has signed the Responsible Care® Declaration, the Senior Executive needs to appoint an RCMR. This position should be filled by a person with sufficient interest and aptitude, and with the willingness to develop the necessary expertise, to competently account for the company's Responsible Care® programme.

The RCMR is the point of contact between the company and CAIA. He or she will also be a champion for Responsible Care® within the business and to other stakeholders.

The RCMR has seven core responsibilities, namely:

- To remain conversant with the Responsible Care® Codes of Management Practice (CMP) and Guiding Principles listed in the Declaration.

- To ensure that the company/facility/site implements the Responsible Care® Guiding Principles and CMP.

- To actively participate in the relevant CAIA fora, committees, work groups, meetings and training.

- To communicate information from CAIA timeously within the company, to relevant personnel and take the necessary decisions as mandated by the company (in all CAIA/Responsible Care®-related matters).

- To ensure that the Responsible Care® self-assessments are carried out by the company as per the RCMS Requirements document.

- To ensure that RCMS audits and/or SQAS-AFRICA audits are conducted as per CAIA requirements.

- To coordinate the recording and reporting of monitoring results for the purposes of the annual KPI data and information submission and ensure approval of the submission by the Highest Authority (who may or may not be the most Senior Executive) in the prescribed timeframe and format.

7.3 Pre-Assessment

Pre-assessment is optional. This is an RCMS audit performed on companies that wish to get the highest possible understanding of their readiness prior to undergoing an RCMS audit performed by a CAIA approved RCMS auditor for certification purposes.

7.4 RCMS Audits

An RCMS audit is conducted within two years of signing the Responsible Care® Declaration and every three years thereafter, using CAIA approved RCMS auditors. The audit report should be submitted to CAIA for review and record purposes.

7.5 Self-Assessment Audits

A self-assessment audit is conducted within one year of signing the Responsible Care® Declaration and annually thereafter. The Responsible Care® self-assessment reports shall be made available for inspection by a CAIA approved Responsible Care® Auditor during Third-Party Verification Audits.

7.6 KPI Data Submission

All signatories are required to submit KPI data annually as per guidance given by CAIA.

CAIA collects data annually from its Responsible Care® signatories to:
- monitor and track KPIs;
- select candidates for the various Responsible Care® awards;
- provide year-on-year performance results;
- identify exceptional performance and where support could be offered on a signatory-specific basis;

- report on aggregate performance in the annual Responsible Care® Performance Report; and
- identify areas where support can be provided to the industry in the form of workshops and training.

These KPIs are drawn from a number of key areas; such as SHE, stakeholder engagement, emergency response, certification and Responsible Care® training carried out.

Selected aggregate results are published annually in the Responsible Care® Performance Report. The reports can be downloaded from the CAIA website.

7.7 Re-Certification

Prior to the expiration of RCMS certification, CAIA approved RCMS auditors will perform re-certification audits. These audits examine the RCMS in its entirety for overall effectiveness. Certificates will be issued by CAIA, valid for a further three years.

8.   ROLES/RESPONSIBILITIES

8.1   Signatories

- Fulfilment of RCMS third-party audit requirements is a mandatory element of the Responsible Care® Initiative. All signatories shall obtain certification to the Initiative, failure of which can lead to exclusion from the Responsible Care® Initiative in South Africa.
- The use of the Responsible Care® logo is restricted to companies that meet the RCMS requirements.
- Signatories shall be responsible for demonstrating conformity to the requirements of the RCMS. Refer to the CMP and the associated AGDs.
- Different sites belonging to a signatory shall be audited individually.
- KPI data shall be submitted to CAIA by each facility/site, individually.
- Signatories shall be audited once every three years, to ensure continuity of the RCMS.
- Security is a component of the RCMS and is subject to review. Signatories shall ensure that arrangements are made prior to the start of an RCMS audit regarding auditor access to security-related materials. Auditors and signatories shall work together to ensure that security-related information is protected and legal restrictions are followed while not compromising the integrity of the RCMS audit.
- Signatories are encouraged to publicise their RCMS status to their stakeholders.

8.2   RCMS Auditors

- All RCMS auditors shall meet the requirements of CAIA's *RCMS Accreditation Manual for Auditors*.
- All auditors shall ensure that audit schedules are consistent with guidance provided in the RCMS Requirements document.
- All auditors shall be familiar with CAIA's RCMS Requirements document.
- Auditors shall comply with CAIA's requests to observe them during audits, if required.
- Auditors shall send copies of audit reports to CAIA upon completing RCMS audits.
- Audits shall be conducted in accordance with the requirements of the current versions of ISO 17021 and ISO 19011.

8.3 CAIA

- CAIA shall ensure that RCMS auditors are trained and accredited.
- CAIA shall ensure that the RCMS requirements are kept current and communicated to all relevant stakeholders.

9.   RESPONSIBLE CARE® Codes of Management Practice

Ten CMP have been developed or are still under development as indicated in the list below.

1. Management Commitment
2. Stakeholder Engagement
3. Pollution Prevention
4. Resource Efficiency
5. Emergency Response
6. Health & Safety
7. Process Safety
8. Storage & Transportation
9. Product Stewardship
10. Security (under development)

These CMP give guidance on how to implement each key area of the RCMS.

10.   RESPONSIBLE CARE® Audit Guidance Document

AGDs have been compiled to guide RCMS auditors when verifying the degree of implementation of the CMP. The AGDs are intended for use by independent CAIA approved RCMS auditors, as well as signatories when preparing themselves for RCMS audits. An AGD has been developed for each CMP. Each AGD is comprised of questions and guidance to the requirements, where necessary.

The AGDs have been designed to cover all chemical and allied industries' SHE and security activities. Not all the CMP and associated AGDs will be necessarily applicable to a specific company/site/facility to be audited. The nature, scope and scale of the company's activities have to be assessed to determine which AGDs are appropriate. It is the responsibility of the signatory to justifiably exclude a CMP and its associated AGD or part thereof, as not applicable to its operations. CAIA reserves the right to make a final decision on the exclusion of any CMP and AGD or parts thereof. For multiple outcomes audits, the RCMS auditor is responsible for addressing issues required by the other international and/or national standard(s), including the scoring criteria to be employed.

11.   AUDIT SCORING SYSTEM

The scoring system developed for use by RCMS auditors and signatories allows for the degree of conformance with the CMP to be quantified and tracking improvement in signatory SHE and security performance. The scoring system is set out in the table on the next page.

RCMS Audit Scoring System	
Score	**Interpretation**
N/A	Not scored - Not applicable
0	No programme
1	Practice and programme exist but no documentation
2	Documentation exists, but requires improvement
3	Practice in place
4	Practice in place maintained (full compliance)

The RCMS auditor shall assign a score for each of the questions in the applicable AGD, using the scoring criteria in the table above. The overall score for each AGD is the mean of the individual scores assigned to each question.

12. RECORDS GENERATED

The following are the records that will be generated after complying with the requirements of this document.
- A signed Declaration.
- A signed RCMR Appointment Letter.
- Self-assessment audit reports.
- An RCMS third-party audit report for each company/facility/site audited, signed by the relevant parties (a copy shall be sent to CAIA by the auditor).
- A certificate issued by CAIA to signatories who have been audited by an accredited RCMS auditor.
- KPI submissions approved by the Highest Authority.

13. IMPLEMENTATION OF NEW OR UPDATED CMP AND AGDS

Due to fact that the RCMS audits track practices-in-place, implementation timing of new/updated CMP and associated AGDs shall be in place as soon as practicable, but not later than the beginning of the company's next financial year.

14. CAIA MEMBERSHIP CATEGORIES AND RCMS REQUIREMENTS

Not all CAIA members are signatories to Responsible Care®. Those companies that sign the Declaration shall be required to comply with the RCMS requirements herein, including the submission of KPI data.

SQAS-AFRICA is a key element of Responsible Care® applied to logistics operations. Logistics service providers (LSPs) affiliated to CAIA (as members or part of the SQAS-AFRICA User Group), shall undertake third-party SQAS-AFRICA audits using SQAS-AFRICA accredited auditors. They shall be exempted from undertaking the RCMS audits.