



## Updates to the ACC Responsible Care® Certification Program

### Highlights of the changes in the RC14001 and RCMS Technical Specifications

It was back in 2002 that the American Chemistry Council first issued its technical specification for Responsible Care, combining the elements of Responsible Care's Guiding Principles, Codes of Management Practices and the international standard ISO 14001:1996. This provided a solid foundation for RCMS and RC14001, which has been adopted by over 140 companies in the last 4 years. One of the key tenets of Responsible Care is continual improvement, and it is not surprising that the American Chemistry Council is updating its technical specifications. While the essence of the requirements of the Responsible Care technical specifications remain the same, some significant changes have occurred, which are outlined below:

### RCMS Modifications

The Responsible Care Management System® (RCMS) Technical Specification has added a number of elements, many of which add some specificity and requirements that ensure additional management system and performance criteria be implemented and evaluated. These include:

1. *Introductory section changes.* The new version of RCMS has removed "introductory preambles" from each section, to prevent the possibility of the auditor perceiving that these are auditable portions of the specification.
2. *Wording changes.* Some words have been changed in RCMS to better align it to the RC14001 specification. Examples include the use of "continual improvement" as opposed to "continuous improvement" and the expectation of commitment to the "Guiding Principles of Responsible Care."
3. *Transportation Risk Assessment.* Implied in the former RCMS specification, the new version specifically requires an organization to assess and prioritize transportation risks, for raw materials and finished products.
4. *Monitoring and Review of Emerging Concerns.* In line with the Global Product Strategy (GPS) initiative, the RCMS specification requires an organization to have a solid process for monitoring concerns related to products, processes and activities associated with operations.
5. *Strengthening of Document Control.* While still far less prescriptive than RC14001 and other ISO-based standards (i.e., ISO 14001 and ISO 9001), RCMS now adds the expectation that any **necessary** documents to **ensure effective implementation, maintenance and control** must be **readily available** in addition to legible, dated and readily identifiable. This differs from the former requirement of simply a "Documented RCMS" which was less clear in terms of what was required and auditable.
6. *Removing Some Details from the Original Guiding Principles.* The former version of RCMS had all ACC Responsible Care Guiding Principles listed, verbatim in the requirements. The organization has summarized these into key phrases that read much more like operational control requirements, and eliminate some redundancies from the former specification.
7. *Significantly Enhanced Product Stewardship Communications.* Perhaps the most significant change in the RCMS technical specification from its former ver-

sion is the enhancement to the communications element (#3.5). Additional requirements here include a process to facilitate:

- a. the flow of information/requirements along the supply chain;
  - b. making product stewardship information publicly available (in deference to the current metrics/transparency initiatives of the ACC Member companies); and
  - c. participation in mutual assistance and sharing programs as embodied in Responsible Care.
8. *Employee EHSS Recognition.* While this was always in the ethic of Responsible Care, it is now explicitly written into the RCMS Technical Specification. This has always been part of the RC14001 requirements but is new to RCMS requirements.
9. *Emergency Response.* Surprisingly, the original RCMS Technical Specification was silent on the specifics of emergency response. The new version of RCMS addresses this issue, requiring a procedure for emergency response that addresses various situations and mitigates impacts, including consideration for appropriate:
- a. communications and community recovery needs;
  - b. participation in the development, implementation and maintenance of community emergency preparedness plans; and
  - c. processes for responding to raw material, product, process, waste material and transportation incidents.
10. *Re-Wording of Commercial Review Section.* A number of people have mentioned that the new version of RCMS “removes the obligation to review Responsible Care performance in the supply chain.” This is not the case. The new version of the RCMS technical specification simply re-orders the wording in such a way to make it clear that a risk-screening of commercial partners to determine the need for further review is allowable, but if the screening process exceeds the company’s defined thresholds, a commercial Responsible Care/EHSS performance review is required.
11. *Re-Organizing of “Reporting” Requirements.* The previous version of the RCMS Technical Specification had a clause called “Management Review and Reporting.” This has now been changed to “Management Review,” and the associated reporting requirements have been moved into the communications section of the protocol (a “do” activity).

In conclusion, RCMS has been built up a bit to be more in line with the RC14001 technical specification and reflects the ongoing focus on product stewardship that the Members of the ACC promote.

### **RC14001 Modifications**

The RC14001 Technical Specification also changed. While most of the changes are in line with RCMS’s additional focus on product stewardship, there is some additional re-alignment in RC14001. These include:

1. *Visible Commitment.* Strengthening the term “personal commitment from top management,” the new version of RC14001 requires “visible leadership, commitment and involvement from senior management and other levels of the organization,” requiring auditors to assess how noticeable the management commitment is and how far down in the organization it permeates.
2. *Monitoring and Review of Emerging Concerns.* Similar to RCMS and in line with the Global Product Strategy (GPS) initiative, RC14001 requires an organization

to have a solid process for monitoring concerns related to products, processes and activities associated with operations.

3. *Prioritization Related to Responsible Care-based Risks.* The word “prioritize” has been added to the Responsible Care clauses in the Aspects clause of RC14001, including transportation, product and process risk prioritization.
4. *Removing Security Vulnerability Assessment Terminology.* The requirement for security vulnerability assessment has been removed in favor of the identification of significant security aspects. This is in deference to the fact that a number of ACC Member facilities are required to conduct security vulnerability assessments (SVAs) under the recently promulgated Chemical Facility Anti-Terrorism Standard (CFATS).
5. *Employee EHSS Recognition.* This has been re-written slightly in the new version of RC14001 to stress the recognition element of EHSS/Responsible Care over the expectation of performance management or “pay for performance,” which was never the intention in the original Responsible Care program.
6. *Assessing Stakeholder Perspectives.* The original RC14001 specification required the organization to “assess stakeholder concerns.” The new version requires an assessment of stakeholder **perspectives**, implying that positive and negative feedback should be assessed.
7. *Significantly Enhanced Product Stewardship Communications.* In line with the changes to the RCMS technical specification, significant enhancements have been made throughout the RC14001 specification related to product stewardship communications, including a process to facilitate:
  - a. making product stewardship information publicly available; and
  - b. the flow of information/requirements along the supply chain.
8. *Management of Change.* An appropriate focus on management of change as a critical element of operational control, in light of the ACC Membership’s strong focus on process safety and ubiquitous process safety management requirements in Member facilities. While management of change is not all intended to be process related, it does reflect this focus from the original Process Safety Code of Responsible Care.
9. *EHS&S Program Focus.* Beyond the original RC14001 clause to address pollution prevention, emissions reduction and groundwater protection, the revision to RC14001 requires a more holistic look at EHS&S programs, not specific to environmental initiatives. This is not intended to downplay the importance of these clauses, but to add a breadth that Responsible Care embodies.
10. *Expansion of Off-Site Incident Response.* Beyond a “transportation emergency response plan,” the new version of RC14001 requires an organization to develop an appropriate response plan/process for raw material, product, process, waste material and transportation incidents.
11. *Sharing of Findings.* RC14001 has been modified to emphasize the need to share the findings related to incidents and system non-conformances, and associated actions, with relevant stakeholders.

In conclusion, RC14001 now better aligns its language with RCMS and the initial intent of the Responsible Care Codes of Management Practices. The product stewardship emphasis is once again prevalent in this set of changes.

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