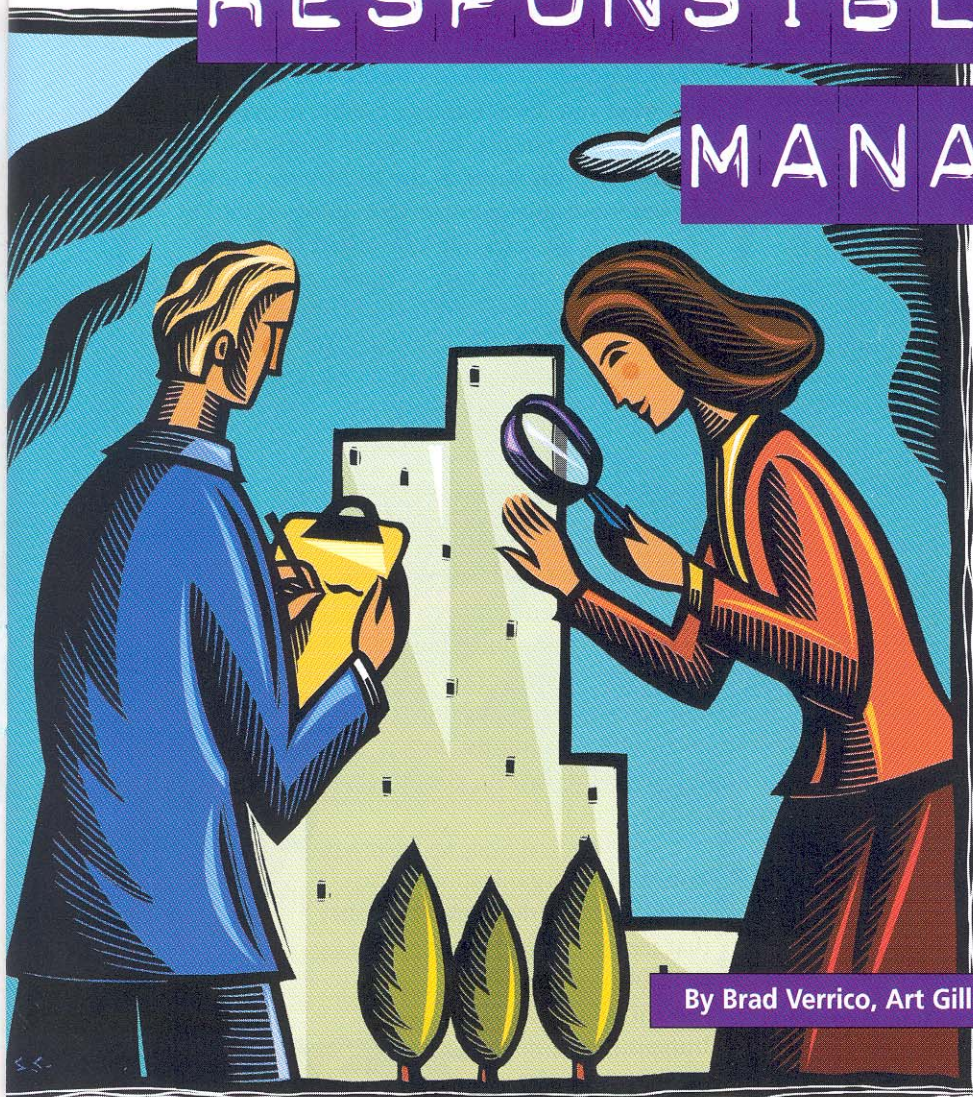


IMPLEMENTING A RESPONSIBLE CARE MANAGEMENT SYSTEM



By Brad Verrico, Art Gillen and Rainer Ochsenkuehn

Insights from the auditors and trainers.

Through early 2004, several ACC member facilities have achieved Responsible Care certification. The Responsible Care Management System (RCMS) approach has been rolled out, and Responsible Care certification requirements (RCMS or RC14001) have been clearly established for American Chemistry Council (ACC) and Synthetic Organic Chemical Manufacturers

Association (SOCMA) membership. Training programs have been developed, and auditor certification is underway. The Responsible Care program varies significantly at each company, but there are some key lessons that are useful to all members. Now is the appropriate time to learn from these initial successes and to identify and understand some of the potential roadblocks to RCMS implementation and certification.

INDUSTRY LESSONS LEARNED

In addition to BASF's Elastocell® unit in Wyandotte, Michigan, Arch Chemicals' Rochester, New York, facility achieved RC14001 certification in December 2003. Marathon Ashland Petroleum's Detroit Refinery has been recommended for certification, and other RC14001 audits are in process. Several pilot audits for RCMS certification are planned in the next several months. From these audits, companies are learning some important lessons.

- **Management commitment is critical.** The implementation of an RCMS in any organization can seem to be a daunting task. If it is to succeed, it will involve multiple levels of employees, starting at the top. Without management's visible commitment to this initiative, it is truly an uphill battle. Determine what specific involvement you need from your management team, and ask for it. This might also involve the education of management about what is involved. It's not just something done overnight because everybody thinks that all system elements are already in place.
- **"Practice in Place" is not the same as RCMS certification.** Contrary to popular belief, the Responsible Care Codes of Management Practices have not gone away. They exist in the form of guidance for RCMS implementation. The Codes give insight on "what" to do, but RCMS provides a framework for "how" these activities are planned, prioritized, implemented, reviewed and adjusted. In other words, an organization may be doing things in accordance with the Responsible Care codes, but it must still organize its activities into a formal management system.
- **Don't build a system just to "pass the audit."** Companies should look at how to gain structure, improve credibility, and involve employees through RCMS efforts. These activities should have one goal in mind: improved performance. Focusing instead on how to strictly gain certification, with minimum acceptable components, and other audit-focused strategies will not add value to the organization. Improved performance is achieved only when an organization is focused on continuous improvement, demonstrates employee involvement at all levels, and truly shows planned, focused efforts towards achieving the tenets of the Guiding Principles of Responsible Care.
- **Cross-functional involvement is critical.** It is necessary to get outside of the environment, health, safety, and security (EHSS) "box" when implementing an RCMS. For example, Donna in

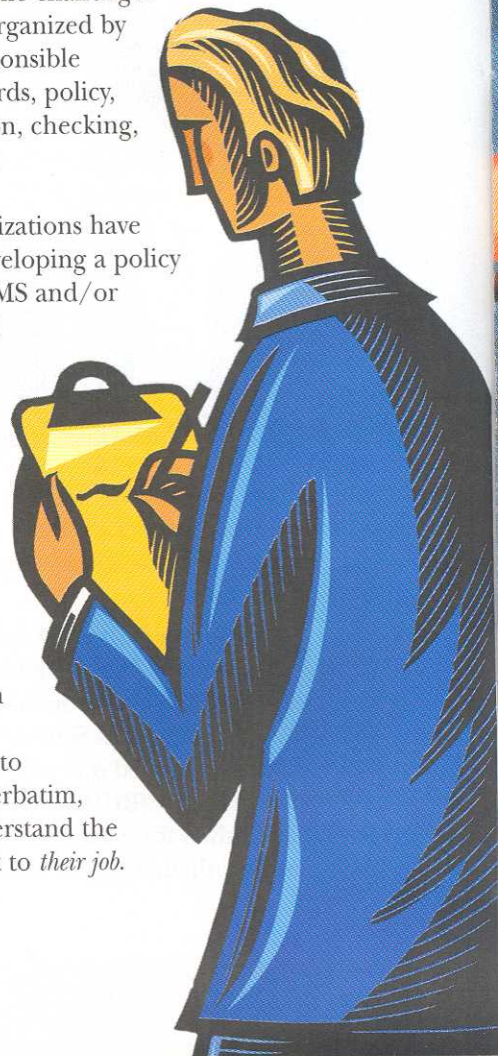
sales doesn't feel Responsible Care is important to her. However, critical elements of the standard, such as product risk prioritization, stakeholder communication and customer performance review, clearly have an impact on how she does her job. The best way to truly integrate Responsible Care throughout the organization is to involve people like Donna in the implementation and make them accountable for its success.

- **Use what you have.** Existing quality management systems, for example, have many components similar to or the same as the RCMS, such as policy, documentation and corrective action. Build on what you already do, and don't be afraid to use the existing structure in place. There can be a tendency to "re-invent" systems when implementing an RCMS. This is neither necessary nor advisable. Building on existing systems, which may be outside the EHSS "box," can bring real benefit.

WHAT TRENDS ARE AUDITORS SEEING?

Specific to the elements of both RCMS and RC14001, auditors have noticed some challenges for industry. These are organized by the elements of the Responsible Care certification standards, policy, planning, implementation, checking, and management review.

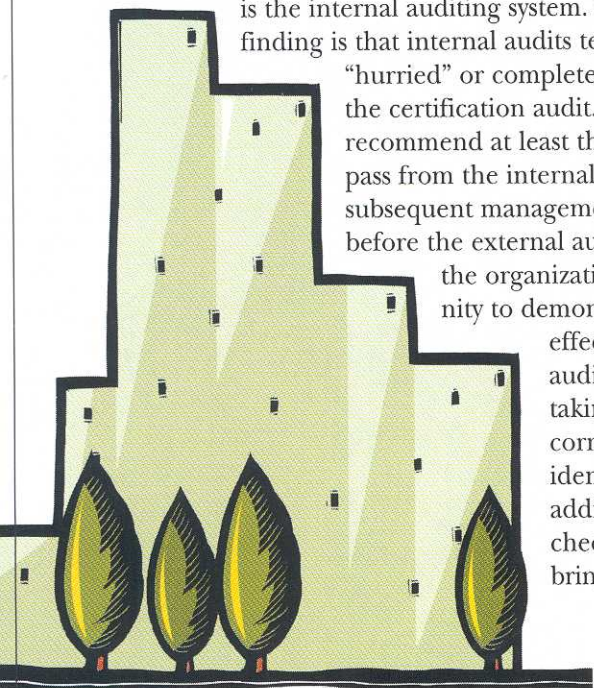
- **Policy.** Most organizations have no difficulty in developing a policy that meets the RCMS and/or RC14001 technical specifications. Implementation challenges in the policy area are centered on employee awareness of the policy, and clear evidence of policy communication. Remember that an auditor does not expect employees to know the policy verbatim, but rather to understand the policy and apply it to *their job*.



■ **Planning.** For RCMS, a critical element of planning is hazard identification and risk prioritization. For RC14001, the corresponding element is identifying aspects and determining significant impacts. The identification of prioritized risks or significant impacts are to be considered in establishing goals, targets and objectives. Here, organizations must balance between having a comprehensive process with having a process too cumbersome to be effective and efficient. Organizations should not “re-invent” a system to identify hazards and risks, but should find ways to organize their existing risk reviews into a clear prioritization.

■ **Implementation.** Auditors have identified a number of implementation issues for companies, but the focus for certification can be summed up in two words: objective evidence. Many organizations are doing the right things, but cannot always face the auditor’s test: “prove it.”

■ **Checking.** An area in which auditors find concerns is the internal auditing system. One key finding is that internal audits tend to be “hurried” or completed right before the certification audit. Auditors recommend at least three months pass from the internal audit and subsequent management review before the external audit. This gives the organization an opportunity to demonstrate the effectiveness of its audit system by taking steps to correct any issues identified. In addition, the checking element brings in the critical



RCMS Implementation and Auditor Training Available

First Environment and Verrico Associates have teamed to provide RCMS and RC14001 consulting services to the industry. They have developed company-specific and public programs to help prepare for and successfully certify RCMS and RC14001.

There are several training programs available for companies and auditors. Visit www.firstenvironment.com and www.verricassociates.com for more information.

concept of commercial partner performance review. This requires that an organization look at EHSS performance as a consideration in the qualification of its carriers, suppliers, distributors, customers, contractors and other third-party providers.

■ **Management Review.** Finally, an organization must demonstrate that it has formally reviewed its RCMS at a top management level. This includes a review of EHSS performance and trends, the results of audits and reviews, and stakeholder perspectives. Auditors have seen some challenges in proving that a thorough management review has been completed, and that changes to the RCMS have resulted.

CONCLUSION

ACC Members and auditors are still learning what it means to certify RCMS. There will continue to be challenges, but the goal is clear. Responsible Care should continue to help drive organizations to improve performance and credibility with stakeholders.

RCMS requires organizations to stay engaged in EHSS performance improvement, and continues to differentiate the chemical industry – and ACC membership – from other industry sectors. **CB**

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