RESPONSIBLE CARE®
MANAGEMENT SYSTEM VERIFICATION
MANAGEMENT SYSTEMS

Simply stated, management systems are the framework for guiding, measuring, and evaluating an organization's (business, charity, club, church committee, etc.) operations. Organizations of all types institute management systems to direct their operations. Often, the management systems are described as "the way we do business" and are reflected in the training manuals, rules, bylaws or other formal documents that the organization maintains and which guide its day-to-day activities.

Effective management systems ensure that the organization can sustain itself in the event of a leadership or other change that occurs in the normal course of events. One example of an organization with effective management systems is a civic group with detailed written rules and procedures for its activities such as the collection and use of dues money. By constantly reviewing (or verifying) that the rules and procedures are in use and updating them when necessary, the club can be assured that a new treasurer or other officer will have all the information necessary to sustain the operations of the organization without disruption. The opposite situation is the organization that creates policy and procedures "on the fly." The organization reviews its operations haphazardly or not at all. In this case, the organization usually must begin from scratch each time a change in leadership occurs or when some new situation arises. For this type of organization, the management systems are most likely those of the individual(s) who happen to be charge, not the organization's.

Management systems are generally believed to consist of the following:

- **Organization.** The internal structure that establishes roles, responsibilities, accountabilities, and reporting relationships.

- **Guidance.** Bylaws, plans, policies, procedures, directives, and standards that provide instructions as to how activities and functions are to be carried out.

- **Controls.** Inspections, audits, reviews, etc., built into operations to ensure that performance is consistent with objectives and requirements.

- **Communications.** Mechanisms for collecting, handling and reporting information to appropriate parties.

One method of ensuring that effective management systems are in place to sustain the organization's day-to-day activities is to conduct a management systems verification. The verification is intended to test the sustainability of the management systems and whether the goals and expectations of the organization are being met.
THE AMERICAN CHEMISTRY COUNCIL

The American Chemistry Council is a nonprofit trade association whose approximately 190 member companies account for more than 90 percent of basic industrial chemical production in the United States. American Chemistry Council (formerly Chemical Manufacturers Association) was founded in 1872 and is one of the oldest trade associations in North America. The Council brings together member company experts to help resolve industry-wide technical and scientific problems, communicates with government and the public on vital issues and administers research, studies and tests on a wide range of chemical products and practices. The Council participates in legislative and regulatory activities at the international, national, state and local levels. (A list of members is attached in Tab 1.)

THE RESPONSIBLE CARE® INITIATIVE

In 1988, the Council launched the Responsible Care® Initiative to respond to public concerns about the manufacture and use of chemicals. Through Responsible Care®, member companies are committed to support a continuing effort to improve the industry’s responsible management of chemicals. Responsible Care® requires members to:

- improve performance in health, safety and environmental quality;
- listen and respond to public concerns;
- assist each other to achieve optimum performance; and,
- report their progress to the public.

Two aspects of Responsible Care® make it unique. First, member companies must participate in Responsible Care® as an obligation of membership in the association. And second, through a national Public Advisory Panel, the public is directly involved in shaping the initiative.

The Responsible Care® Initiative is made up ten key elements, which include:

1. GUIDING PRINCIPLES which set forth the philosophy of Responsible Care® and outline each member company’s commitment to environmental, health and safety responsibility in managing chemicals.
2. CODES OF MANAGEMENT PRACTICES are at the heart of the Initiative. The six Codes focus on the management practices in specific areas of chemical manufacturing, transporting and handling. Member companies must make a good-faith effort to attain the goals of each Code.


- The Pollution Prevention Code commits industry to the safe management and reduction of wastes.

- The Process Safety Code is designed to prevent incidents and accidental releases at plant sites.

- The Distribution Code focuses on employee and public risks from the shipment of chemicals and applies to the transportation, storage, handling, transfer and repackaging of chemicals in transit.

- The Employee Health and Safety Code protects employees and visitors at plant sites.

- The Product Stewardship Code manages chemicals from initial research through recycling and disposal.

3. A PUBLIC ADVISORY PANEL made up of environmental, health and safety thought leaders assists the industry in identifying and developing programs and actions that are responsive to public concerns. In some instances, Council members sponsor Community Advisory Panels (CAPs) which serve in a similar role for their facilities at the local level.

4. MEMBER SELF-EVALUATIONS are submitted annually for the purpose of tracking progress in the implementation of the six Codes of Management Practices. These self-evaluations are a valuable management tool for the Council and individual member companies in directing assistance efforts.

5. CODE PERFORMANCE MEASURES for each of the six Codes allow the Council and its member companies to demonstrate progress in carrying out Responsible Care®. Through these measures, the industry and the public will gain a better appreciation for the progress the Council members are making in carrying out Responsible Care®.
6. Members and Partners establish **PERFORMANCE GOALS** against which they measure their environmental, health and safety progress. Company goals are intended to reflect the concerns and expectations of the company and its stakeholders. Members and Partners publicly report progress towards achieving their goals annually.

7. A **MANAGEMENT SYSTEMS VERIFICATION** process to assist member company improvement in environmental, health and safety performance. The management systems verification process includes appropriate public involvement.

8. **MUTUAL ASSISTANCE** forums allow member companies to help each other in implementing all the elements of Responsible Care®. Company-to-company mutual assistance efforts take place at the Executive Leadership, Responsible Care® Coordinator and plant manager levels.

9. The **PARTNERSHIP PROGRAM** allows companies which take ownership or possession of chemicals or chemically-related trade associations to participate in the Council’s Responsible Care® Initiative. The Partnership Program allows companies that are not eligible for membership in the Council to participate in the initiative (for example, a railroad or trucking company which transports chemicals). (A list of Partner companies and associations can be found in Tab 1.)

10. The Council’s Bylaws make participation in Responsible Care® an **OBLIGATION OF MEMBERSHIP** for all member companies. Member companies must ascribe to the Guiding Principles, participate in the development of the initiative, make good faith efforts to implement the program elements of the initiative and use the Responsible Care® logo in accordance with approved guidelines.

(Copies of the Responsible Care® Guiding Principles and the six Codes of Management Practices can be found in Tab 2.)

For more information on American Chemistry Council and Responsible Care®, visit our website

www.americanchemistry.com
In June 1993, the Council’s Board of Directors approved a series of nine enhancements to the Responsible Care® Initiative. Included in the enhancements was a recommendation to develop a Responsible Care® management systems verification process. The Board stated that a management systems verification process would assist companies in improving their environmental, health and safety performance and contribute to the building of trust between chemical facilities and their neighboring communities. Following three years of development and testing, the Council’s Board approved a management systems verification process for use by its member companies in April 1996.

In the context of the Responsible Care® Management Systems Verification process, management systems are the collection of programs, operations, people, documents, policies, guidelines, procedures, facilities, and equipment required to effectively manage and sustain environmental, health, and safety activities. The verification of management systems provides an accurate understanding of how the leadership of a chemical company intends that its environmental, safety and health responsibilities be met.

A Responsible Care® management systems verification is not an audit to identify non-compliance with federal, state or local government regulations. It does not validate the adequacy of health, safety and environmental performance such as the level of air or water emissions at a facility. It does verify that appropriate systems are in place and are functioning to assure continued compliance with applicable regulations. Further, it verifies that appropriate health, safety and environmental performance goals have been established by the company. A Responsible Care® management systems verification looks for the existence of internal company audit procedures to verify ongoing compliance with these goals and regulations.

The Responsible Care® management systems verification process is built around a verification protocol or guidance document which organizes the verification into a general sequence of steps. The protocol identifies organizational structures, responsibilities, practices, procedures, processes and resources for implementing and maintaining a management system which are then reviewed by a team of verifiers.

In the Responsible Care® management systems verification process, industry peers accompanied by community representatives, engage in a series of open-ended interviews of company personnel, documentation reviews and on-site observations, as outlined in the protocol, to determine whether a company has appropriate, functioning
and sustainable management systems in place. Through this interview/review/observation process, the industry peers and community representatives will be able to identify strengths and areas for improvement in the company's management systems. These findings are submitted to the company being verified in a final written report.

KEY DOCUMENTS - THE PROTOCOL

When reviewing a company's management systems, the verification team will use the protocol or guidance document that organizes the verification into a general sequence of steps. The protocol identifies five core areas that make up an effective Responsible Care® management system. These core areas are: 1) Policy and Leadership; 2) Planning; 3) Implementation, Operation and Accountability; 4) Performance Measurement and Corrective Action; 5) Management Review and Reporting. (A copy of the protocol outline can be found in Tab 3.)

Within each of the five core areas "attributes" have been identified. Attributes are the necessary systems, organization, policies, programs, etc. that support each core area of the management system and will be the basis for the evaluation of the overall management system. Evidence of the existence of these attributes and their integration into the company's operations and culture should result in effective management systems. Each of the attributes can be linked to a specific practice or practices in the six Responsible Care® Codes of Management Practices. (A sampling of interview questions for use by verifiers are included in Tab 3.)

ROLES OF VERIFICATION TEAM MEMBERS

Typically a verification team will consist of a team leader, 1-2 verifiers and a representative from the community. With the exception of the community participant, the team members are active chemical company personnel. While roles will be determined on a case-by-case basis, following are typical responsibilities:

Team Leader/Facilitator

The team leader is the initial contact with the company. His/her job is to identify appropriate information about the company to share with the verification team, including manufacturing processes, organization, site locations, etc. Working with the company representative, the leader will determine the appropriate sites to be verified and identify company personnel for interview.
She/he will establish travel and interview schedules for the team, brief the team and assign responsibilities. In addition, he/she will brief the community representative and, working with the company and community, will establish the appropriate role for the community participant in the verification.

At the completion of the interviews, the team leader will collect team member work sheets and draft a report of the findings. This report will be reviewed by the verification team and by the company for accuracy and finalized and issued to the company by the team leader.

Verifiers

Team members are chosen from Council companies based on their knowledge of Responsible Care®, chemical industry operations and of the management system verification process. The verifiers participate in a two-day training session before conducting a verification. The verifiers and team leader conduct interviews and take detailed notes during the verification for inclusion in the final report. They will also be called on to review and edit the draft report.

Community Representative

Community representatives are invited to be as active as they wish on the verification. If a community participant feels comfortable in the role, they will be asked to lead the questioning during panel interviews. The team leader will assign appropriate functional interviews for the community representative. The appropriate role for community involvement in this process has to be based on the company’s and community representative’s interest and desire. The team leader will be responsible for facilitating this role and assigning responsibilities. The local facility will also provide the community representative with appropriate safety information and address any issues pertaining to the protection of confidential business information.

A schedule for a “typical” Responsible Care® management systems verification can be found in Tab 4.
Our industry creates products and services that make life better for people around the world — both today and tomorrow. The benefits of our industry are accompanied by enduring commitments to Responsible Care® in the management of chemicals worldwide. We will make continuous progress toward the vision of no accidents, injuries or harm to the environment and will publicly report our global health, safety and environmental performance. We will lead our companies in ethical ways that increasingly benefit society, the economy and the environment while adhering to the following principles:

- To seek and incorporate public input regarding our products and operations.
- To provide chemicals that can be manufactured, transported, used and disposed of safely.
- To make health, safety, the environment and resource conservation critical considerations for all new and existing products and processes.
- To provide information on health or environmental risks and pursue protective measures for employees, the public and other key stakeholders.
- To work with customers, carriers, suppliers, distributors and contractors to foster the safe use, transport and disposal of chemicals.
- To operate our facilities in a manner that protects the environment and the health and safety of our employees and the public.
- To support education and research on the health, safety and environmental effects of our products and processes.
- To work with others to resolve problems associated with past handling and disposal practices.
- To lead in the development of responsible laws, regulations and standards that safeguard the community, workplace and environment.
- To practice Responsible Care® by encouraging and assisting others to adhere to these principles and practices.
POLLUTION PREVENTION
CODE OF MANAGEMENT PRACTICES

Purpose

This Code is designed to achieve ongoing reductions in the amount of all contaminants and pollutants released to the air, water, and land from member company facilities. These reductions are intended to respond to public concerns with the existence of such releases, and to further increase the margin of safety for public health and the environment.

The Code is also designed to achieve ongoing reductions in the amount of wastes generated at facilities. These reductions are intended to help relieve the burden on industry and society of managing such wastes in future years.

In implementing the Code, each company should strive for annual reductions, recognizing that production rates, new operations, and other factors may result in increases. Despite these fluctuations, however, the goal is to establish a long-term, substantial downward trend in the amount of wastes generated and contaminants and pollutants released. Quantitative reduction goals will be established for giving priority to those pollutants, contaminants and wastes of highest health and environmental concern.

This code also includes practices that address the broader waste management issues beyond source reduction and other waste and release reduction efforts. Each member company must manage remaining wastes and releases in a manner that protects the environment and the health and safety of employees and the public.

This Code complements, and should be implemented in conjunction with current and future Codes of Management Practices. Key terms are defined in the Glossary, which should be consulted for assistance in interpreting the provisions of this Code.

Relationship to Guiding Principles

Implementation of this Code helps achieve the following Guiding Principles:

- To recognize and respond to community concerns about chemicals and our operations.
• To develop and produce chemicals that can be manufactured, transported, used and disposed of safely.

• To make health, safety, and environment considerations a priority in our planning for all existing and new products and processes.

• To report promptly to officials, employees, customers and the public, information on chemical-related health or environmental hazards and to recommend protective measures.

• To operate our plants and facilities in a manner that protects the environment and the health and safety of our employees and the public.

• To extend knowledge by conducting or supporting research on the health, safety, and environmental effects of our products, processes, and waste materials.

• To promote the principles and practices of Responsible Care® by sharing experiences and offering assistance to others who produce, handle, use, transport, or dispose of chemicals.

• To work with others to resolve problems created by past handling and disposal of hazardous substances.

• To participate with government and others in creating responsible laws, regulations and standards to safeguard the community, workplace and environment.

• To promote the principles and practices of Responsible Care® by sharing experiences and offering assistance to others who produce, handle, use, transport or dispose of chemicals.

Management Practices

Each member company shall have a pollution prevention program which shall include:

1. A clear commitment by senior management through policy, communications, and resources, to ongoing reductions at each of the company’s facilities, in releases to the air, water, and land and in the generation of wastes.

2. A quantitative inventory at each facility of wastes generated and releases to the air, water, and land, measured or estimated at the point of generation or release.

3. Evaluation, sufficient to assist in establishing reduction priorities, of the potential impact of releases on the environment and the health and safety of employees and the public.

4. Education of, and dialogue with, employees and members of the public about the inventory, impact evaluation, and risks to the community.

5. Establishment of priorities, goals and plans for waste and release reduction, taking into account both community concerns and the potential health, safety, and environmental impacts as determined under Practices 3 and 4.
6. Ongoing reduction of wastes and releases, giving preference first to source reduction, second to recycle/reuse, and third to treatment. These techniques may be used separately or in combination with one another.

7. Measurement of progress at each facility in reducing the generation of wastes and in reducing releases to the air, water, and land, by updating the quantitative inventory at least annually.

8. Ongoing dialogue with employees and members of the public regarding waste and release information, progress in achieving reductions, and future plans. This dialogue should be at a personal, face-to-face level, where possible, and should emphasize listening to others and discussing their concerns and ideas.

9. Inclusion of waste and release prevention objectives in research and in design of new or modified facilities, processes, and products.

10. An ongoing program for promotion and support of waste and release reduction by others, which may, for example, include:
   a. Sharing of technical information and experience with customers and suppliers;
   b. Support of efforts to develop improved waste and release reduction techniques;
   c. Assisting in establishment of regional air monitoring networks;
   d. Participation in efforts to develop consensus approaches to the evaluation of environmental, health, and safety impacts of releases;
   e. Providing educational workshops and training materials;
   f. Assisting local governments and others in establishment of waste reduction programs benefiting the general public.

11. Periodic evaluation of waste management practices associated with operations and equipment at each member company facility, taking into account community concerns and health, safety, and environmental impacts and implementation of ongoing improvements.

12. Implementation of a process for selecting, retaining, and reviewing contractors and toll manufacturers taking into account sound waste management practices that protect the environment and the health and safety of employees and the public.

13. Implementation of engineering and operating controls at each member company facility to improve prevention of and early detection of releases that may contaminate groundwater.

14. Implementation of an ongoing program for addressing past operating and waste management practices and for working with others to resolve identified problems at each active or inactive facility owned by a member company taking into account community concerns and health, safety, and environmental impacts.

Industry Trend Data
To develop and maintain statistical industry trends, CMA will collect currently available data. Each company shall report annually to CMA, or its designated agent, for each facility:

- Releases of substances as reported under SARA Section 313; and
- Wastes generated, as defined and reported in CMA’s annual waste survey.

**Member Self-Evaluation**

Each member company shall report annually to CMA, or its designated agent, the stage of implementation of each management practice in this Code. The reports shall be on the member self-evaluation form attached as Attachment A.

**Glossary of Terms**

As used in this Code, key terms are defined as set forth below. Note that these definitions may be broader than regulatory definitions, and that adherence to this Code does not relieve a company of the obligation to meet Federal, state and local regulatory requirements.

**Facility** - A site used for chemical manufacturing, processing, refining, packaging, R&D, distribution or related commercial activity.

**Recycle** - A practice which regenerates or processes a material from a process to recover a useable product or material for reuse.

**Release** - Any emission, effluent, spill, discharge or disposal to the air, land, or water, of any pollutant or contaminant, whether routine or accidental, at or from a facility. The term does not include shipment or distribution of chemical product, nor release to the environment as part of normal and intended use of a product by the consumer.

**Reuse** - A practice that reemploys a material from a process either as an ingredient in a process to make a product, or as an effective substitute for a commercial product in a particular function or application.

**Source Reduction** - A practice that reduces the amount of any release or waste generated at the source, including closed loop recycle and reuse before exit from a process. The term includes, among other practices, equipment and technology modifications, process and procedures modifications, reformulation and redesign of products, substitution of raw materials, and improvements in housekeeping, maintenance, training and inventory control.

**Treatment** - A practice, other than recycle or reuse, that alters the physical, chemical, or biological characteristics or the volume of a waste through a process or activity separate from the production of a commercial product or the provision of a service.

**Waste** - Any gas, liquid, or solid residual material at a facility, whether hazardous or non hazardous, that is not used further in the production of a commercial product or provision of a service and which itself is not a commercial product.
Purpose and Scope

The purpose of the Product Stewardship Code of Management Practices is to make health, safety and environmental protection an integral part of designing, manufacturing, marketing, distributing, using, recycling and disposing of our products. The Code provides guidance as well as a means to measure continuous improvement in the practice of product stewardship.

The scope of the Code covers all stages of a product's life. Successful implementation is a shared responsibility. Everyone involved with the product has responsibilities to address society's interest in a healthy environment and in products that can be used safely. All employers are responsible for providing a safe workplace, and all who use and handle products must follow safe and environmentally sound practices.

The Code recognizes that each company must exercise independent judgment and discretion to successfully apply the Code to its products, customers and business.

Relationship to Guiding Principles

Implementation of the Code promotes achievement of several of the Responsible Care® Guiding Principles:

- To make health, safety and environmental considerations a priority in our planning for all existing and new products and processes;

- To develop and produce chemicals that can be manufactured, transported, used and disposed of safely;

- To extend knowledge by conducting or supporting research on the health, safety and environmental effects of our products, processes and waste materials;

- To counsel customers on the safe use, transportation and disposal of chemical products;

- To report promptly to officials, employees, customers and the public, information on chemical-related health or environmental hazards and to recommend protective measures;
• To promote the principles and practices of Responsible Care® by sharing experiences and offering assistance to others who produce, handle, use, transport or dispose of chemicals.

Management Practices

Each company shall have an ongoing product stewardship process that:

Management Leadership and Commitment

1. LEADERSHIP: Demonstrates senior management leadership through written policy, active participation and communication.

2. ACCOUNTABILITY and PERFORMANCE MEASUREMENT: Establishes goals and responsibilities for implementing product stewardship throughout the organization. Measures performance against these goals.

3. RESOURCES: Commits resources necessary to implement and maintain product stewardship practices.

Information and Characterization

4. HEALTH, SAFETY and ENVIRONMENTAL INFORMATION: Establishes and maintains information on health, safety, and environmental hazards and reasonably foreseeable exposures from new and existing products.

5. PRODUCT RISK CHARACTERIZATION: Characterizes new and existing products with respect to their risk using information about health, safety, and environmental hazards and reasonably foreseeable exposures. Establishes a system that initiates re-evaluation.

Risk Management

6. RISK-MANAGEMENT SYSTEM: Establishes a system to identify, document, and implement health, safety and environmental risk-management actions appropriate to the product risk.

7. PRODUCT and PROCESS DESIGN and IMPROVEMENT: Establishes and maintains a system that makes health, safety and environmental impacts—including the use of energy and natural resources—key considerations in designing, developing and improving products and processes.

8. EMPLOYEE EDUCATION and PRODUCT USE FEEDBACK: Educates and trains employees, based on job function, on the proper handling, recycling, use, and disposal of products and known product uses. Implements a system that encourages employees to feed back information on new uses, identified misuses or adverse effects for use in product risk characterization.
9. CONTRACT MANUFACTURERS: Selects contract manufacturers who employ appropriate practices for health, safety and environmental protection for the operations under contract, or works with contract manufacturers to help them implement such practices. Provides information and guidance appropriate to the product and process risk to foster proper handling, use, recycling and disposal. Periodically reviews performance of contract manufacturers.

10. SUPPLIERS: Requires suppliers to provide appropriate health, safety and environmental information and guidance on their products. Factors adherence to sound health, safety, and environmental principles, such as those contained in Responsible Care® into procurement decisions.

11. DISTRIBUTORS: Provides health, safety and environmental information to distributors. Commensurate with product risk, selects, works with and periodically reviews distributors to foster proper use, handling, recycling, disposal and transmittal of appropriate information to downstream users. When a company identifies improper practices involving a product, it will work with the distributor to improve those practices. If, in the company’s independent judgment, improvement is not evident, then the company should take further measures -- up to and including termination of the business relationship. This Management Practice should be implemented in conjunction with the Distribution Code of Management Practices.

12. CUSTOMERS AND OTHER DIRECT PRODUCT RECEIVERS: Provides health, safety and environmental information to direct product receivers. Commensurate with product risk, works with them to foster proper use, handling, recycling, disposal, and transmittal of appropriate information to downstream users. When a company identifies improper practices involving a product, it will work with the product receiver to improve those practices. If, in the company’s independent judgment, improvement is not evident, then the company should take further measures -- up to and including termination of product sale.

Relationship to Other Codes of Management Practices

This code complements, and should be implemented in conjunction with, current and future Codes of Management Practices.
RESPONSIBLE CARE®
MANAGEMENT SYSTEM VERIFICATION

PROTOCOL
Member companies of the American Chemistry Council are committed to support a continuing effort to improve the industry’s responsible management of chemicals. They pledge to manage their businesses according to the Guiding Principles of Responsible Care®, placing a high priority on the protection of the environment, the health and safety of their employees and the public, and the implementation of the Responsible Care management practices. To do so effectively their environmental, health and safety, and Responsible Care® activities must be conducted within a structured system that is integrated with their overall management activity. The core elements of a Responsible Care® management system are described below.

1. POLICY AND LEADERSHIP

This management element addresses the leadership exhibited by senior management in setting clear policy and guidelines for performance, and for enhancing the value of the Responsible Care® ethic within the organization.

Attributes

Senior management demonstrates leadership and commitment for their organization (company, plant or business unit) by active participation in the creation and implementation of a clear and visible policy that:

1. involves a demonstration of a personal commitment and dedication to Responsible Care®;
2. is relevant to the nature and scale of the organization’s products and processes;
3. fosters openness in dealing with stakeholders and takes into account public and employee inputs;
4. sets a framework for reviewing and establishing Responsible Care® and environmental, health, and safety goals, objectives, and targets;
5. includes a commitment to continual improvement of the management of chemicals;
6. includes a commitment to comply with relevant legislation and regulations;
7. reflects the company’s commitment to the Guiding Principles of Responsible Care®; and
8. is documented, maintained and communicated to employees.

RESPONSIBLE CARE® MANAGEMENT SYSTEM
2. PLANNING

This management element addresses; 1) the identification and assessment of relevant regulations and industry standards, 2) the evaluation of product, process and distribution risks, 3) the identification and assessment of employee and community concerns about the organization's environmental, health and safety performance, and 4) setting priorities and goals for performance improvement.

Attributes

The organization demonstrates appropriate planning by:

2.1 having systems in place for the assessment of hazards and risks associated with their products, including the integrating the risk evaluation process into the research and development of new products, or changes to existing products,

2.2 having systems in place for the assessment of hazards and risks associated with their processes, including the integrating the risk evaluation process into the research and development of new processes, or changes to existing processes,

2.3 having a system in place for the assessment of hazards and risks associated with transportation and distribution activities that includes impact on the environment, personnel and communities,

2.4 creating and maintaining a database for product information related to environmental, health and safety risks,

2.5 having processes in place for the systematic review of all environmental, health and safety related regulations, and their interpretations, that are relevant to the organization's activities,

2.6 maintaining documented Responsible Care® goals, objectives, and targets which have clear means, time frames, and responsibilities for accomplishment,

2.7 having a system in place for the identification of needs and allocation of resources to implement performance improvements, and

2.8 having processes in place to assess community and employee concerns about the organization's activities.
3. IMPLEMENTATION, OPERATION AND ACCOUNTABILITY

This management element addresses the achievement of objectives and policy expectations. It also covers the preparation and competence of employees to carry out their tasks, and documentation that is critical to the execution of those tasks.

Attributes

The organization demonstrates that implementation, operation and accountability are part of their management system by the existence of:

3.1 a clear definition of responsibility and accountability for the execution of Responsible Care® tasks;

3.2 training programs that include task specific skills and competencies, and awareness of regulatory requirements appropriate to the task;

3.3 a process for communication, outreach, and dialogue with stakeholders of relevant risks and impacts of the organization’s activities to human health and the environment, and plans for improving the organization’s Responsible Care® management system;

3.4 employee involvement in the development, communication and execution of Responsible Care® programs;

3.5 documented procedures to ensure safe operations for all processes, process changes and maintenance;

3.6 written site emergency response plans with appropriate considerations of communications and community recovery needs;

3.7 participation in the development of community emergency preparedness planning;

3.8 a documented process for responding to chemical transportation incidents;

3.9 programs to provide appropriate guidance, information and training requirements to carriers, distributors, customers, and contractors on the risks and hazards of the organization’s products and processes, and for receiving guidance and information from suppliers on goods and services used by the organization;

3.10 processes for the qualification and selection of suppliers, carriers, distributors and contractors that place priority on environmental, health, and safety performance; and
3.11 emissions reduction, pollution prevention, and ground water protection programs.

4. PERFORMANCE MEASUREMENT AND CORRECTIVE ACTION

This management element deals with the use of performance indicators, performance reviews, accident and incident investigation, compliance audits, data records, and taking or recommending corrective actions.

Attributes

The organization demonstrates the use of performance measurement and corrective action by having processes in place for:

4.1 the tracking of emissions and releases, accidents and injuries, process incidents, near-hits, and distribution incidents;

4.2 reviewing the performance of all carriers, suppliers, distributors, customers and contractors;

4.3 the investigation of accidents and incidents that get at the root causes of the occurrence and develop recommendations for prevention or corrective action;

4.4 the maintenance of sufficient data files to enable analysis of trends and performance against goals;

4.5 the audit or review of compliance with regulations and company procedures; and

4.6 the measurement of the effectiveness of its communications programs with its stakeholders.
QUESTIONS FOR VERIFYING THE MANAGEMENT SYSTEM

Sufficient dialogue must take place between the verifiers and the appropriate managers of the organization to determine whether the elements of the management process have been developed, integrated into the organization’s activities and are effective in improving performance. Questions should be asked to directly probe the significant management process element attributes.

Suggested questions, listed below, are designated by a Q and are designed to open dialogue. Bullet items under the questions are thoughtful probes to lead to further questions if the item is not forthcoming in the responses resulting from the questions. In some cases the thoughtful probes define questions to be asked of different functional managers within an organization.

Questions for Senior Management to test Policy and Leadership

Q1: What process do you go through to determine if your Responsible Care®/EHS policy is relevant to the nature of your organization’s business?
- Reviewed against industry peers?
- Have board level review?
- Make results based judgments?
- Can we see your policy?

Q2: How do you integrate the philosophy of continual improvement into your Responsible Care®, environmental, health and safety policy?
- Long term goals?
- Integrate quality and business management with EH&S management?

Q3: How does your policy foster the establishment and review of Responsible Care®, environmental, health and safety performance goals?
- References to responsibility for goal setting?
- Required reporting?
- Can we see your goals?

Q4: How is your commitment to regulatory requirements reflected in your policy?

Q5: Could you describe your process for communicating your policy to stakeholders?
- Annual reports?
- Newsletters, bulletin boards?
- Can we see some examples?

Q6: How do you obtain employee and public feedback on your policy?
- Board committee?
- Employee meetings?
- CAPs?