

American Chemistry Council
Responsible Care[®] Certification Process
Transition to RCMS[®]: 2013 and RC14001[®]: 2013 Technical Specifications
June 5, 2013

As part of their commitment to Responsible Care ACC member and Partner companies have made a series of enhancements to the RCMS and RC14001 Technical Specifications. These enhancements are intended to promote continual improvement in the areas of environment, health, safety, security, product safety and product stewardship.

To foster an orderly change over from the current (2008) to the new (2013) versions of the technical specifications, ACC has developed the following transition process. The transition period will begin on September 15, 2013 and end on December 31, 2014 and is defined as follows:

A. For companies certifying to RCMS with no surveillance

RCMS: 2008 shall be used through December 31, 2013 according to existing ACC procedures. After January 1, 2014 all audits will be conducted using RCMS: 2013.

Exception: In situations where completion of an ACC company's audit(s) for the 2011-13 audit cycle carries over into 2014, the company may petition ACC for permission to use the RCMS: 2008 Technical Specification for completion of the audit(s). These companies shall be subject to ACC's governance process. All parties are reminded that completion of these "carry-over" audits does not relieve the company of its audit obligations for the 2014-16 audit cycle.

B. Transition from RC14001: 2008 to RC14001: 2013 and RCMS: 2008 to RCMS: 2013 (RCMS with surveillance) - September 15, 2013 – December 31, 2014

1. Initial Phase (beginning September 15, 2013 ending December 31, 2013)

RCMS: The Audit Service Provider (ASP) and existing and/or new client organization shall determine whether RCMS: 2008 or RCMS: 2013 is to be used as the audit criteria. The version of the Technical Specification being used shall be identified in the audit plan for initial audit, surveillance or reassessment.

RC14001: The Audit Service Provider (ASP) and existing and/or new client organization shall determine whether RC14001: 2008 or RC14001: 2013 is to be used as the audit criteria. The version of the Technical Specification being used shall be identified in the audit plan for initial audit, surveillance or reassessment.

Third-party RCMS/RC14001 auditors conducting audits against the 2013 versions of the Technical Specifications must complete required update training before engaging in an audit.

2. Implementation date for new Technical Specifications - January 1, 2014.

Beginning January 1, 2014, all audit plans prepared for existing and new client organizations shall include, as appropriate, RCMS[®]: 2013 or RC14001[®]: 2013 as the audit criteria.

3. Extra Visits by Audit Service Providers (ASPs)

Additional visits by ASPs to assess solely against revisions to the Technical Specification are not required. ASPs may include additional time on surveillance audits to address the required new items in the technical specifications. ASPs shall communicate their additional audit time requirements to the client and provide an explanation of the allotment of additional time upon request. The ASP must allow adequate time to confirm conformity to the revised (2013) Technical Specification.

4. Nonconformities (September 15, 2013 - December 31, 2014)

For existing organizations (that are certified to RC14001: 2008 or RCMS: 2008 under Item B), nonconformities against the new elements of the 2013 versions of the Technical Specification shall be raised. These nonconformities against new elements of the Technical Specifications will not adversely affect existing certification status to the 2008 version of the Technical Specification until the end of the transition period.

5. Certificates

The RCMS or RC14001 Technical Specification indicated on any certificate/statement of conformance shall be consistent with the standard identified on the audit plan. Existing certificates/statements of conformance shall be renewed as conforming to the new Technical Specification version (2013) no later than December 31, 2014.

6. Accreditation body assessment of ASP Plans

ASPs shall submit their plan for managing this transition to ACC's designated accreditation bodies (ANAB or BEAC) for review and approval. Plans shall be submitted prior to the start of the transition on September 15, 2013 and shall include information on:

- a. How auditors are deemed competent prior to conducting audits to the revised RC14001 or RCMS Technical Specification; including training evidence per ACC's designated update training plan.
- b. Appropriate personnel deemed competent to the new Technical Specifications (e.g., contract reviewers, decision makers, etc.,) prior to any activity to the new Technical Specifications.
- c. Process for transitioning customers including communication to customers and when/how audits will be scheduled.

Accreditation bodies shall review and approve or provide comments for corrective action in a timely manner.

C. Inclusion of Process Safety Focus on Audits

Beginning on January 1, 2014, ASPs shall include additional emphasis on Process Safety Code requirements during audits utilizing a designated ACC approach and checklist tool (which will be available after June 30, 2013). ASPs shall make appropriate plans to include this approach and checklist tool in audits occurring under Items A & B above after January 1, 2014. This additional emphasis on Process Safety is for audits occurring at ACC member and Responsible Care[®] Partner HQ and facilities only.

For “carry-over” audits utilizing the RCMS[®]: 2008 Technical Specification occurring under item A above, there is no requirement to include a Process Safety focus during the completion of these audits.

Note: Due to the phased implementation schedule for the Product Safety Code, additional emphasis on this code on audits will not be required until January 1, 2015. A checklist tool for the Product Safety Code will be available after June 30. This additional emphasis on Product Safety is for audits occurring at ACC member and Responsible Care Partner HQ and facilities only.

D. Inquiries and Information

All inquiries regarding this transition process shall be directed to the American Chemistry Council. Please contact Dan Rocznik at dan_roczniak@americanchemistry.com or 202-249-6191.