Responsible Care®
Management Framework and Guidance on Use
Responsible Care® is the global chemical industry’s own unique initiative which helps the worldwide chemical industry to drive continual improvement in all aspects of health, safety and environmental performance and to be open in communication about its activities and achievements.

Responsible Care is both an ethic and a commitment intended to build trust and confidence in an industry that is essential to improving living standards, the quality of life and sustainable development.

A set of Global Responsible Care Core Principles commit companies and national associations to work together. Through the sharing of information and a rigorous system of checklists, performance indicators and verification procedures, Responsible Care enables the industry to demonstrate how it has improved over the years and to develop policies for further improvement. In these ways, Responsible Care helps the industry to gain the trust of the public and to operate safely, profitably and with due care for future generations.

For further information visit the Responsible Care website: http://www.responsiblecare.org/ and the Cefic website: http://www.cefic.be/ for specific information on the programme in Europe.

Acknowledgement

A working group set up by the Responsible Care Core Group under the direction of the Cefic Board has prepared this document. During its preparation, consultation involved all the members of the RCCG including experts from Companies and Associations.

Cefic would like to thank those consulted for their comments, which have helped to improve the content and presentation. Cefic particularly thanks the members of the working group who wrote the document and to their member Associations and Companies who generously allowed their time.

Issue Status

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Foreword

Global Responsible Care Approach

A set of Fundamental Features and Guiding Principles are the basis of all national Responsible Care programmes.

**Global Fundamental Features**

- Establishing and implementing a set of Guiding Principles that member companies can sign
- Adopting a title and logo that are consistent with Responsible Care
- Implementing management practices through a series of systems, codes, policies or guidance documents to assist companies to achieve better performance
- Developing a set of performance indicators against which improvements can be measured
- Communicate with interested parties inside and outside the membership
- Share best practices through information networks
- Encouraging all association member companies to commit to and participate in Responsible Care
- Introduce and apply systematic procedures to verify the implementation of the measurable elements of Responsible Care by member companies.

**Global Core Guiding Principles**

The Global Responsible Care Core Principles commit companies and national associations to work together to:

- Continuously improve the environmental, health and safety knowledge and performance of our technologies, processes and products over their life cycles so as to avoid harm to people and the environment.
- Use resources efficiently and minimise waste.
- Report openly on performance, achievements and shortcomings.
- Listen, engage and work with people to understand and address their concerns and expectations.
- Cooperate with governments and organisations in the development and implementation of effective regulations and standards, and to meet or go beyond them.
- Provide help and advice to foster the responsible management of chemicals by all those who manage and use them along the product chain.

The fundamental features and Guiding Principles act as the stable set of concepts that, if turned into practice by an organisation, open the door to environmental, health, and safety excellence.
Pan European Responsible Care Approach

Cefic Vision for Responsible Care Performance

- No harm to employees, contractors and the general public from our operations
- No adverse environmental or public impact resulting from the operation of our plants or in the distribution of our products
- Continuous improvement in the efficient use of the planet’s resources
- Provision of products meeting customer requirements that can be manufactured, transported, used and disposed of safely
- The chemical industry is accepted as an open, honest and credible industry by all its stakeholders and the general public
- General and public recognition that the chemical industry is a responsible industry playing an important role in bringing a wide range of benefits to society

It is a well-accepted principle that good management systems support the drive long term for continual performance improvement. This Responsible Care Management Framework is based on the Deming Cycle of “Plan, Do, Check and Act” and will take into account the requirements of existing recognised management systems standards such as ISO 14001, OHSAS 18001, EMAS and ISO9001. It defines the minimum requirements for Responsible Care that should be considered by the company or site and where appropriate their existing management system can be enhanced through the Framework to address any gap. It can also be used by companies that have yet to put a management system in place. This approach provides flexibility to allow national or regional differences to be taken into account.

The introduction of a single Responsible Care Management System for Europe is not recommended. Verification is considered an essential element of the programme both to raise levels of achievement and performance within the industry and to demonstrate transparency to stakeholders outside the industry.

Self assessment by companies on their implementation of Responsible Care is to be a mandatory requirement. To increase credibility and raise stakeholder confidence there should also be a commitment to move to periodic external assessment.

External verification can be carried out through a number of approaches to allow flexibility and meet national and cultural differences in the EU member states. They include assessments by national federations (provided they have the resource and the skills to do it), through peer review (provided that the assessors have the necessary qualifications and are approved by the national federations), or through the use of fully independent external specialists.
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**Responsible Care Qualifying Requirements**

To be able to claim to be a Responsible Care organisation in a country in which there is a national Responsible Care programme, recognised by the ICCA, and display the internationally recognised symbol for Responsible Care, an organisation must:

- Demonstrate top level commitment through the CEO, or equivalent, signing the Responsible Care Guiding Principles of the national association in that country.
- Follow codes and guidance relevant to the national Responsible Care programme.
- Provide indicators of performance as required by the national association.
- Verify their Management System is consistent with the Cefic Responsible Care Management System Framework.

Organisations are also strongly encouraged to:

- Engage in open and honest communication
- Cooperate in the mutual help network
- Encourage programme development

If an organisation is not a signatory to the national Responsible Care programme in a country in which it operates then it cannot claim to be a Responsible Care company in that country and must not display or make use of the Responsible Care trademark within its operations in that country even if it is a signatory to a Responsible Care programme in another country.

**Figure 1  Scope of the Framework**
1. Introduction

Cefic recognises that many, if not all, companies already have a management system in place, thus the intention is not to introduce another one. The underlying purpose of the framework is to provide guidance and enable companies to review their own position and integrate Responsible Care issues into core business processes on their way in developing a sustainable business.
The framework is based on Deming’s PLAN, DO, CHECK, ACT cycle which is familiar to many organisations and has the benefit of being both practical and effective in delivering improved organisational performance and management systems processes.

1.1 Scope of the Framework

The requirements of the framework are a series of Key Phases set out in section 2 of this document. These Key Phases are used to design, implement and maintain a management process for Responsible Care. As part of the European RC programme, European Associations are required to ensure that these Key Phases are addressed within their own management system approach for Responsible Care and that the Responsible Care organisations within their membership address these requirements within their own management system. Section 3 provides guidance on what should be addressed by each key phase.

This framework is based on a management process, and as such, does not state specific performance criteria.

The framework will increase harmonisation and consistency, raise performance and is modelled on structures commonly reflected in informal and formal management systems such as:-
- SIGMA Project – Sustainability - Integrated Guidelines for Management (www.projectsigma.com)

and the management system requirements of:
- Eco-Management and Audit scheme (EMAS) Regulation (EC) N° 761/2001 (OJ L 114 or 24.4.2001) which are used throughout the industry. Many companies already have one or more of these and may make use of them to deliver aspects within the framework.

This framework will be reviewed or amended when considered appropriate. Reviews will be conducted when new issues of the above listed documents are published, to ensure continued compatibility.
Figure 2 Implementation Options for Associations

This high level management framework has been written to provide flexibility to national associations on how it is implemented within their national programme. For example, one association may use it directly with their members, whilst another may enhance it with more detailed implementation guidance which reflects additional needs of their members and stakeholders. Those Associations which already have a national Responsible Care Management System Guidance may simply use it to update their existing document. This approach therefore provides good flexibility whilst still providing a Pan European programme based on a common framework, coordinated by Cefic, but implemented and managed by the national associations and their member companies.

1.2 Implementation of the Framework

This high level framework has been written with the expectation that it will help organisations, of all sizes, advance Responsible Care within their existing management system/processes, or introduce one if they do not have one.

The Framework can be used in the context of any management system and is applicable to any organisation in the chemical, or allied, industry which aims to:

• meet statutory requirements and Industry Goals & Targets
• maintain control of activities, people, equipment and materials
• achieve continual improvement
• assemble and retain Responsible Care knowledge and good practice
• provide education and training for its employees and contractors
• provide transparency of information and demonstration of improvement for its stakeholders

The management framework supports organisations in defining their own policy, objectives, priorities and performance targets and achieving them

Implementing a robust management system does take time and effort but significant benefits can be achieved by a consistent approach across Europe. It is also good commercial sense to reduce costs to the organisation in terms of:

• people’s time (e.g. lost workdays due to illness or injury, reworking products)
• property (e.g. damage caused by incidents, increased breakdowns due to inadequate maintenance)
• energy and materials (e.g. emissions to air, water; scrap to landfill; spills, rework, inadequate management of utilities)
• future liabilities (e.g. contaminated land, claims for ill-health, product liability )
• increased insurance premiums and/or reduced coverage

These costs can be reduced and experience has shown that the implementation of a Responsible Care management system can help to achieve significant improvements.
1.3 Verification of Responsible Care Implementation

Verification is one of the fundamental features and considered an essential element of the Responsible Care initiative. Self-assessment by companies on their implementation of Responsible Care is a mandatory requirement within Europe and seen as the means on delivering on this fundamental feature.

Figure 3  Management Framework Phases
2. Responsible Care Management Framework Requirements

This framework (which is based on Deming’s Plan-Do-Check-Act cycle) shall be applied to current, and any future, key elements of the Responsible Care initiative, e.g. occupational health, occupational & process safety, environment, product stewardship, emergency preparedness, distribution, stakeholder engagement. A schematic of the key framework phases which Responsible Care organisations shall address through their management system, is shown in Figure 3 and explained below.
Define the vision for Responsible Care and ensure leadership support for it

**LEADERSHIP AND COMMITMENT** (GUIDANCE IN SECTION 3.1)
To develop the business case for Responsible Care issues and secure the essential commitment from senior management to integrate Responsible Care into core processes and decision-making.

**POLICY** (GUIDANCE IN SECTION 3.2)
To define the organisation’s direction and long-term objectives for Responsible Care in terms of performance and the conduct of its activities.

Decide what needs to be done to improve performance

**IDENTIFY REQUIREMENTS** (GUIDANCE IN SECTION 3.3)
To identify regulatory and other requirements which affect the organisation, to identify the significant risks of the activities and materials within the organisation’s control and influence and to establish requirements based on the significance of those risks.

**PLAN** (GUIDANCE IN SECTION 3.4)
To formulate long-term strategies, develop tactical plans that prioritise the significant requirements for improvement and control, and to set goals & targets and to document plans to achieve them.

**ORGANISE** (GUIDANCE IN SECTION 3.5)
To define the structure of the organisation and responsibilities, the type and extent of resources and the documentation required to implement the policy, control and objectives, including documentation of the management system.

Improve Performance

**IMPLEMENT AND CONTROL** (GUIDANCE IN SECTION 3.6)
To put into practice the plans to meet the organisation’s policy and objectives and improvement plan. To identify the controls that should be in place for the activities that are defined as significant.

Check that performance is improving and communicate the results:

**MONITOR** (GUIDANCE IN SECTION 3.7)
To generate and maintain efficient internal and external feedback loops to monitor progress against stated values, strategies, performance objectives and targets of the organisation in meeting its Responsible Care requirements, and to correct deficiencies.

**MANAGEMENT REVIEW** (GUIDANCE IN SECTION 3.8)
To meet the information needs of internal and external stakeholders and incorporate feedback into effective strategic and tactical reviews, including the effectiveness and suitability of the management processes and organisational performance in achieving the goals, objectives and targets, culminating in appropriate change.
3. Guidance on Use

Clear and effective leadership is essential to ensure that the vision, ethics, values and beliefs of the organisation support a positive Responsible Care culture.
3.1 Leadership & Commitment

Clear and effective leadership is essential to ensure that the vision, ethics, values and beliefs of the organisation support a positive Responsible Care culture.

Leaders demonstrate their commitment to all employees and stakeholders in a highly visible way, and ensure that changes take into account the organisation’s Responsible Care commitments.

Managers and leaders at all levels in the organisation ensure that the effectiveness of the management system is maintained and addresses the current and future Responsible Care issues, together with the needs and expectations of the organisation’s stakeholders, both internal and external thereby supporting sustainable development.

3.2 Policy

Responsible Care organisations have a documented policy, or policies, which address the relevant aspects of their business including Responsible Care.

For some organisations a more specific statement may be required for each location and/or business unit which is consistent with the overall company, and/or corporate, policy.

Top management ensure that the policy is:
- communicated to employees and their representatives and contractors
- publicly available
- appropriate to the nature, scope and scale of activities
- compatible with business goals
- authorised by the top level of management
- readily understandable
- periodically reviewed

When writing the policy the following should be addressed:
- compliance with relevant legislation, regulation, codes, standards and other requirements to which the organisation subscribes, for example Responsible Care, EMAS etc.
- commitment to good Responsible Care practice including continuous improvement and recognition of the roles, duties and responsibilities of all employees in achieving this
- principles for the future developments of products, services and activities
- providing a framework for setting and reviewing goals, objectives and targets,
- management of risk in order to prevent harm to people and the environment
- communication with stakeholders, both internal and external
3.3 Identifying Requirements

A Responsible Care organisation develops strategies to identify and maintain the requirements that need to be delivered by its management system. The strategy should take into account past, present and future challenges, including Responsible Care, which the organisation faces and the current and potential areas/markets in which they operate.

3.3.1 Identifying Regulatory and Other Requirements

Responsible Care organisations have procedures for identifying and maintaining a list of legal and other requirements that are applicable to its activities, products and services. Effective systems should be established to ensure those individuals appointed as accountable for implementation of requirements are notified.

3.3.2 Identifying Hazards and Assessing Risks

Responsible Care organisations have processes to systematically identify the hazards, including human factors, and environmental impacts and assess the risks of its activities, raw materials, products and services that it can directly manage (direct effects) and also those which it can only seek to influence (indirect effects). The scope of the assessment should include product development, manufacturing, marketing and distribution, through to use, mis-use, recycling and disposal.

Consideration is given to actual and potential risks arising from:
- controlled and uncontrolled events
- routine and non-routine conditions
- past, present and future activities

The assessment techniques provide results which may be subject to a range of uncertainties and consequently they need to be applied by competent personnel.

3.3.3 Identifying Significant Risks

Responsible Care organisations define and use screening criteria to assess which risks are significant and ensure that all significant risks be prioritised for more detailed assessment.

3.3.4 Outlining the Risk Management Requirements

The Responsible Care requirements are part of those that are needed to manage the organisation’s significant risks. They consist of both controls to be maintained and improvements to be made. Any changes or improvements follow a recognised risk assessment/reduction strategy. It may be necessary to repeat the risk assessment and evaluation process, to ensure that the proposed improvement will meet the desired criteria.

Significant risks may be addressed by:
- adequate controls within the existing management system (i.e. to ensure that current standards are maintained)
- adequate controls within Improvement Programmes (i.e. to ensure that new standards are adequate and effectively introduced)
- identified as something the organisation should seek to influence (e.g. recycling of a product after use by the customer)

The organisation should clarify those risks that are considered beyond the control of the organisation. (e.g. a supplier over whom the organisation has little control or influence).

3.3.5 Risk Assessment Review

All risk assessments are reviewed according to defined criteria and that these reviews. Reviews, carried out at regular intervals, may be based on, for example:
- the actual or perceived significance of the risk
- the controls used to manage the risk
- complaints
3.4 Planning

An organisation needs to put processes and plans in place to deliver strategic and tactical Responsible Care and other requirements, whether these are improvements, routine controls or emergency situations. In general, the policy will be translated into objectives and these, in turn, into more detailed targets down and across the organisation.

3.4.1 Objectives

Responsible Care organisations define objectives including those for achieving improvement and/or for the management and control of risks.

Responsible Care objectives are derived from the policy and take into account relevant current or proposed legal requirements, codes of practice and other relevant issues.

Other relevant issues may be:
- public commitments made by the national association or the organisation
- the organisation’s existing performance
- management audit and performance review
- financial, operational, technical and business requirements

Targets derived from, and designed to deliver the objectives should be set at all relevant levels of the organisation.

Processes exist for preparing plans in order to support the achievement of the Responsible Care objectives, targets and other requirements. These plans link activities, tasks and responsibilities with objectives and targets.

Employees have the opportunity to participate in the development, implementation and review of Responsible Care plans.

3.4.2 Defining the Strategy

An improvement programme may provide the most convenient method of collating objectives and intended risk management actions controls and targets into a prioritised format that can also be used to communicate importance of intended changes.

Having defined the programme, and by identifying the Responsible Care requirements in terms of controls and improvements, the planning, implementation and monitoring phases develop these requirements into more detailed targets and performance criteria.

3.4.3 Prioritising and Setting Targets for Improvement

The assessment process (section 3.3) will have identified those risks or effects that should form part of an improvement programme, and will have included some initial prioritisation.

Responsible Care organisation puts in place documented plans to achieve the improvement programme.

Procedures are maintained for achieving objectives and targets, managing change, for purchasing and for contracted out services.

3.4.4 Planning for Control

Responsible Care organisations plan for and control operations, activities, effects and risks that are considered significant. Planning should identify the requirements and resources required for ensuring adequate control. It is helpful to consider controls to goods and services used (see section 3.6).

3.4.5 Performance Criteria

Where practicable, performance criteria are defined for Responsible Care requirements, inter alia.

Monitoring is carried out to assess compliance against these criteria (see section 3.7).

Performance indicators derived from these criteria be developed for internal management use or external communication. Processes be put in place to provide an audit trail and allow data collected to be verifiable.

An organisation’s performance indicators include those which are required by the National Association’s Responsible Care programme to which they are a signatory, and should include Cefic & ICCA Responsible Care Core indicators.
3.4.6 Emergency Preparedness

Documented plans be prepared for responding to incidents, both on and off-site, and mitigating their consequences, including out of normal hours.

Routines be defined to ensure that emergency equipment is available and in good working order. If emergency response plans cannot be met for any reason then contingency plans should be put in place, communicated and, if necessary, site activities restricted.

Plans be reviewed and practiced periodically (e.g. annually), with external resources where appropriate, and revised as necessary in the light of changing situations and experience, particularly experience gained from actual incidents.

Plans and other relevant information be communicated to:
- management who will control such incidents
- employees who need to respond
- others who may be affected, such as contractors or visitors.

Incidents may require external assistance or have an offsite effect. Therefore plans should be communicated, as appropriate.

Employees who have responsibilities in the event of an incident should be regularly assessed, and training provided as required (see also section 3.5.4)

3.5 Organisation

The successful implementation of the organisation’s policy, including Responsible Care aspects, requires the commitment and active participation of everyone in the organisation. This should be reflected in the structure of the organisation and the allocation of resources.

3.5.1 Structure and Responsibility

Responsibilities, authorities and inter-relationships for all levels of management with respect to the organisation’s management system be clearly defined and documented.

Consideration should be given to those personnel who need the organisational freedom and authority to:
- provide sufficient resources and personnel for implementation of organisation’s policy
- identify hazards and assess risks
- ensure compliance with the overall policy and its associated procedures
- identify, investigate and record non-compliances.
- recommend actions from non-compliances, monitor progress and verify that they have been implemented
- communicate non-compliances and related actions
- act in emergency situations

Organisation nominates one of its senior managers at board level to be responsible for Responsible Care issues.

3.5.2 Management Representatives

The organisation appoint one or more management representatives with specific responsibility for the overall management of Responsible Care. These people, who may have other duties outside Responsible Care, should have defined organisational freedom and authority and should be responsible for:
- ensuring that the system requirements for managing Responsible Care are established, implemented and maintained
- reporting performance indicators to management for subsequent review and improvement
- influencing and guiding top management on Responsible Care issues

3.5.3 Resources

The organisation identifies the appropriate resource requirements for the management, operation and verification of specific Responsible Care activities. Resources should be reviewed regularly as part of the Management Review phase of the framework.
3.5.4 Competence
The organisation establishes and maintains processes to identify people’s knowledge, competencies, training needs and provide training for all personnel who may be exposed to, or have the potential to create, effects.
Training programmes include staff at all levels in the organisation. It is important that managers are given sufficient training so that they can lead the development, implementation and audit of Responsible Care within the management system, and motivate and coach those who work for them.
The level of education, training and experience required for an assigned role be consistent with the degree of risk associated with it (see section 3.3). Where appropriate, competence be formally assessed and recorded (e.g. for an unsupervised task). Where required to maintain proficiency, training be repeated or updated at regular intervals.
The adequacy of training programmes be verified and record of training maintained.
Consideration may also be made for the training, education and competency validation of certain personnel from outside the organisation who come onto site.

3.5.5 Documentation
The organisation ensures processes are in place to ensure that documented procedures are consistent with the requirements of its Responsible Care policy/policies, objectives and any external codes of practice or management system standards, which have been adopted.

3.5.5.1 CONTENT AND DETAIL
Documentation is needed for situations where the absence of procedures could adversely affect Responsible Care performance; or lead to failure to meet legislation, policy, objectives or targets.

3.5.5.2 DOCUMENTS AND RECORDS
In addition to documents, records to be maintained which demonstrate compliance with the requirements of procedures and legal requirements.

3.5.5.3 DOCUMENT AND DATA CONTROL
The objective of document control is to ensure that people who need to refer to any of the documents or data as part of their job should have the correct and up-to-date versions available. How to change documents and who has authorisation to make changes also be defined.

3.5.6 Communications
An important aspect of Responsible Care is establishing an on-going, open dialogue with stakeholders. Good communication can help to demonstrate management commitment, deal with concerns and questions, raise awareness, provide information and improve motivation.

3.5.6.1 INTERNAL
Processes be established and maintained for internal communication throughout the organisation and, in particular to ensure all employees are aware of the importance of the contribution of their work, and their responsibility and participation in improved Responsible Care performance. That programmes are in place to obtain and address employee concerns regarding the organisation on a systematic and periodic basis and also maintain dialogue with employees in order to obtain their opinions, to address their concerns and provide information.

3.5.6.2 COMMUNITY RELATIONS PROGRAMME
The organisation establishes processes for communication with all stakeholders which covers the receipt and response to stakeholders communications, as well as making policies and other information, such as performance indicators, publicly available.
Sites have in place a programme that addresses assessment of community concerns on a regular basis. A programme to promote familiarity with the site and its operations by the open and convenient provision of the information wanted by the community.

3.5.6.3 COMMUNICATING WITH OTHERS
The organisation shares relevant Responsible Care knowledge and lessons learnt from incidents to help prevent others from experiencing similar incidents.
3.6 Implementation and Control

This section addresses the ways in which an organisation ensures that its actions and processes are implemented as intended and supports the tactical and strategic planning.

3.6.1 People

The key to improving Responsible Care performance is for people to develop and maintain a positive, safe and responsible behavioural approach to their work. Management has a key role in the improvement of human factors, including behaviour, in order to develop and maintain a positive Responsible Care culture through their leadership and commitment (see section 3).

The organisation manages, develops and invests in their people at individual, team and organisational levels whilst involving and empowering them on Responsible Care activities and planning.

The organisation makes all employees aware that they are required to take reasonable care in the workplace for their own health and safety and for that of others.

3.6.2 Purchasing

The objectives of purchasing processes are to ensure that the required goods or services meet the requirements ‘fit for purpose’, ‘on time’ and ‘value for money’. It is essential that equal weighting is given to Responsible Care and quality requirements, and, in particular, to minimise the risk of any harm, damage or injury.

3.6.2.1 SPECIFICATIONS

Procedures ensure requirements are defined for purchased goods and service, identifying those which may entail significant Responsible Care hazards.

3.6.2.2 PURCHASING DATA AND DOCUMENTATION

All purchasing requirements be formally documented and provided to the supplier.

3.6.2.3 EVALUATION AND SELECTION OF SUPPLIERS

The organisation selects suppliers based on an assessment of their capability to meet specified requirements and on the potential risk arising from the supply of goods or service.

Re-assessment of a supplier may form part of an improvement or corrective action (see section 3.7.4) following unsatisfactory performance of the goods or service.

Assessment visits need to be formal, documented and carried out by persons with appropriate management system and Responsible Care knowledge.

3.6.2.4 CONTROLS AND MONITORING

It is required that the basic controls be sufficient to verify and validate that the goods or services supplied meet the specified requirements. Further, the information gained during the assessment may be the basis for determining any additional controls and monitoring that may be required during the supply of the goods or service.

It is recommended that there be a formal method of communicating complaints to the supplier about incidents or persistent poor performance. Where practicable, the organisation should work with the supplier to improve performance and to demonstrate the mutual benefits of such an approach.

The organisation be prepared to suspend or terminate business with any supplier who is unwilling to implement corrective actions to manage risks or otherwise achieve agreed objectives. Note that this may only occur in exceptional circumstances but it forms an essential part of product stewardship.

Processes should notify other sites in the organisation (who may deal with the supplier) of such termination or suspension.
3.6.3 Contractors
The organisation identifies criteria for the selection of contractors, establish minimum performance standards, and assess their performance against them.
In the context of this section, ‘contractor’ means a supplier who works on an organisation’s site.
As part of the contract, the contractors agree to abide by the relevant Responsible Care provisions of the organisation’s policy, which will include compliance with the site health and safety rules and must ensure that this undertaking also applies to any sub-contractors that the contractor may decide to use.
The organisation defines the responsibility for contractors and sets up communication links between appropriate levels of the organisation and the contractor.

3.6.4 Manufacturing
It is important to have systems in place to allow effective management of the activities involved in making the organisation’s product. The first step is to understand the hazards involved, evaluate the risks (see section 3.3) and document the methods of control.
Controls be in place for all activities identified as significant (see section 3.3).

3.6.4.1 EQUIPMENT
Equipment important for maintaining control of Responsible Care requirements has been systematically identified during risk assessment (see section 3.3) and design. This should include equipment designed to maintain the integrity of plant containment, contribute to the health and safety of people, to protect the process or other assets and the environment.

3.6.4.2 SYSTEMS, PROCEDURES AND OTHER TECHNIQUES
Documented procedures be adequate for the effective planning, operation and control of processes and should cover all situations where their absence could lead to deviations from Responsible Care Policy, Objectives of Targets.

3.6.4.3 MANAGEMENT OF PEOPLE
People responsible for managing, operating and maintaining the plant need to have the appropriate skills and be adequately trained, qualified and experienced for the roles and activities they are required to perform and where appropriate their competency verified (see section 3.5.4 above). It is recommended that opportunities should be available for involving employees at all levels in management activities, such as monitoring performance, auditing and identifying, and delivering improvement, as well setting policy, goals and objectives (see section 3.6.1).
Adequate security arrangements exist for control of access of visitors, contractors and others onto manufacturing plant.
Health assessment be available to assess employees’ fitness based on legal requirements and an assessment of their occupational health risks e.g. night workers

3.6.4.4 MAINTENANCE AND INSPECTION
Adequate maintenance and inspection of plant and equipment is key to the prevention of incidents that may cause harm to people and or the environment.
Documented maintenance and inspection procedures be provided where necessary.

3.6.4.5 MANAGEMENT RESPONSIBILITY
Management ensure that adequate controls exist, work effectively and as intended. They should monitor standards, performance and trends through an audit and inspection process (see section 3.7). Incidents and non-compliances (e.g. against procedures or performance criteria) should be promptly reported, recorded, investigated and the learning gained used in the improvement process.
3.6.5 Distribution

Product stewardship addresses Responsible Care along the supply chain. At the stage of distribution which involves packaging, storage, transportation and delivery of products, product stewardship considerations demand that there is a specific product focus in a number of processes that have been described generically throughout this guidance.

3.6.5.1 RISK ASSESSMENT (SEE SECTION 3.3.2)

The organisation carries out risk assessment and control for all aspects of chemical storage and distribution.

3.6.5.2 PACKAGING AND LABELLING

The organisation ensures appropriate controls for:
- the selection and use of packages, containers and transport tanks that are appropriate for the chemical being shipped and that comply with the appropriate testing and certification requirements
- appropriate labelling which clearly identifies the product and its hazards and which complies with regulatory requirements
- loading and unloading of hazardous chemicals at the facilities of the organisation, the customer, and or the distributor
- cleaning and return of packages and transport tanks including tank cars, tank trucks, marine vessels, returnable/refillable, bulk or semi-bulk containers

3.6.5.3 LOGISTICS SERVICE PROVIDERS AND DISTRIBUTORS

The organisation identifies criteria for the selection of logistics service providers and distributors as suppliers of a service, establish minimum performance standards and assess their performance against them. In addition, it should provide appropriate product HS&E information and encourage the proper handling, storage and transportation practices.

3.6.5.4 CUSTOMERS AND OTHER PRODUCT HANDLERS

The organisation provides HS&E information to all customers and product handlers and, consistent with the product risk, work with them to encourage the proper product use, handling, storage, transportation, recycling and disposal and to pass on any appropriate information to the ultimate user.

3.6.6 Emergency Preparedness

The organisation has a plan to deal with emergencies at any point in the product supply chain. Emergency incident information (TREM CARDS) be supplied to drivers at an appropriate point before departure and that the organisation should be a member of a scheme which provides advice or support in the event of a transport incident involving its products (e.g. ICE, Chemsafe).

Transport and distribution is often the most visible activity of the chemical industry and it is advisable that organisations equip themselves to communicate with the general public and the media audiences as well as with the local communities.

3.6.7 Selling

The organisation provides appropriate product-related HS&E information and training to all customers (including distributors and agents) and, consistent with the product risk, work with them to help assure proper use, handling, storage, transportation, recycling and disposal. Encouragement should be given to the passing on of this type of support further downstream in the supply chain, and feedback sought on the effectiveness of these measures.

3.6.7.1 SALES INFORMATION

The organisation identifies and provides customers with appropriate information which enables them to manage their risks.

3.6.7.2 ASSESSMENT OF CUSTOMERS

The organisation assesses the capabilities of its customers to safely manage its products. The organisation should undertake such assessment against predetermined criteria to ensure consistency of approach and ease of providing feedback to the customer.
3.6.7.3 CONTROLS AND MONITORING
Mechanisms be in place to bring information concerning incidents involving the organisations materials with customers’ activities back to the supplier. Where appropriate, the organisation may offer to work with the customer to learn from such incidents.

3.6.8 Management of Change
Changes to established operations can have a significant effect on the performance of the organisation. The changes of most concern are those that affect the agreed operating limits. Care be taken to ensure that conflicts between health, safety, environment and product quality are satisfactorily resolved. It is advisable that temporary changes should be treated in a similar manner to permanent changes.

3.6.8.1 MAJOR CHANGE
Where the change is significant, such as new plant or significant modifications to existing plant, that the Responsible Care requirements be assessed and documented at defined points in the design process. Also, the documentation should provide evidence that the final design has been checked against the original intentions. That the HS&E critical changes be reviewed prior to fabrication, construction and installation and then during operation, to ensure that they meet the assessed requirements.

3.6.8.2 OTHER SIGNIFICANT CHANGES
Special arrangements may need to be made for changes that occur rarely but which may have a significant Responsible Care effect. A succession of small changes may also produce a significant effect.

3.7 Monitoring
The organisation ensures that monitoring provides objective evidence that the management requirements of Responsible Care, identified in sections 3.3, 3.4, 3.5, and 3.6, are being progressed and met.

In developing a suitable monitoring programme consider:
• defined performance criteria or acceptable standards (e.g. appearance, state of repair)
• responsibility for monitoring and reporting
• monitoring frequency
• required capability for any monitoring technique
• identifying trends through data analysis
• action to be taken if unsatisfactory
• providing inputs to management review
• communicating results, including reporting of indicators of performance

Records of all monitoring activities be retained. (see section 3.7.5)

3.7.1 Measurement
Measurement is an important aspect of maintaining and improving Responsible Care performance. It provides demonstrable supporting evidence that the organisation’s objectives and targets are being met. For environmental and occupational health monitoring, measurement of certain key parameters may be a legal requirement. The equipment that is used for measuring be controlled, calibrated, and maintained. The schedule for measurement, frequency of calibration and maintenance be defined. That any equipment that fails to perform as required be withdrawn from use and its test status indicated. For critical instruments, contingency plans be made to provide an alternative. When test equipment is found to be out of calibration the validity of previous results be reviewed.

3.7.2 Checking and Inspection
A schedule be drawn up for checking and inspection of plant, and ancillary equipment and critical systems. This is an essential part of an active monitoring programme and includes inspections and examinations which form part of arrangements for preventive maintenance, many of which are legal requirements.
3.7.3 Internal Audit

Internal audits can be one of the key means for assessing the strengths, compliance and areas for improvement in the management processes & system and a pre-planned audit schedule be devised to ensure that the whole system is covered within a defined period. It is advisable that internal audits be, where practical, aligned with other audit programmes. It is advisable that procedures should describe the audit process. Personnel who carry out audits be competent on the basis of appropriate education, training and/or experience and should, where practicable, be independent of the area they are auditing. Audit findings and observations be recorded and communicated in such a way that those responsible can take appropriate action.

3.7.4 Improvements

An opportunity for improvement may be found during any routine monitoring or as a result of an incident. All deficiencies/incidents be investigated to establish the root cause or causes and the investigations should be reported. Corrective action be taken to eliminate the cause and be appropriate to the magnitude of the problem and its potential effect. Any necessary changes to processes or working practice be properly implemented and recorded in documented procedures. The findings of the investigation be communicated to all relevant parties. Improvements be subject to review in order to assess their effectiveness in preventing a recurrence of the problem.

3.7.5 Records

Records may arise from the various activities that are carried out by the organisation during normal operations and the implementation of its management system.

The records necessary to provide evidence of compliance with:
- legal and regulatory requirements, as well as the organisation’s objectives and targets
be established for each business and functional area.

The management system defines the responsibility for maintenance and storage of records including their retention time which may be defined in regulations. Properly maintained records be accessible, legible and may be in the form of hard copy or electronic media.

The rules for confidentiality, retention times and access rights be established.
The record control system address the issue of amending a controlled document
3.8 Management Review

The organisation’s senior management review the management processes and overall system at regular intervals to ensure that it is still effective and appropriate to the organisation’s activities and culminating in appropriate changes to support continual improvement in line with the need to achieve the organisation’s values, policy, strategies, performance objectives and targets.

3.8.1 Review Frequency

The frequency of the review be determined by the organisation and be part of the normal business planning process. It depends on the size and complexity, so a small organisation may find an annual review is appropriate, whereas, a large complex organisation may have many reviews in a year. On occasion unscheduled special additional attention may be needed to deal with problem areas.

3.8.2 Review Approach

Management reviews reinforce continual improvement. They are a good opportunity for managers to show their leadership and commitment to continual improvement.

The review focuses on objective information and data.

3.8.3 Review Content

The scope of the review covers the entire management system with respect to Responsible Care. Similarly, policy, objectives and targets be reviewed (by the senior management that defined them) at a frequency determined by the organisation.

Results be documented and analysed for trends that may indicate systematic problems. Any major or persistent problem areas receive special attention.

3.8.4 Records of Review and Communications

All reviews be documented to show what decisions and actions were taken to address management systems and process efficiency, customer related product improvements and resource needs.

The outcome of reviews be communicated to all those who have made an input or are affected by outputs from the review.
Appendix 1

Comparative Table of Responsible Care Management Framework and other formal Management Frameworks and Systems

A.1.1. Purpose and Use
This Appendix is intended to provide a ‘Linkage’ for companies who already incorporate/address any or all of the following standards/specifications/frameworks:

- **Quality**: ISO 9001:2000
- **Environment**: ISO 14001:2004 and EMAS 2001
- **Sustainable Development**: Project Sigma, Sustainability - Integrated Guidelines for Management

and how this supports the implementation of the framework. Conversely, the table can be used to determine how implementation of the Responsible Care management framework supports these other formal management systems through an integrated approach.

The information in this table has been put together with the input of a number of national competent bodies involved in accreditation and certification of ISO management systems and EMAS registration.

A.1.2. Comparative Table
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<th>ISO 14001</th>
<th>OHSAS 18001</th>
<th>ILO-OSH 2001</th>
<th>ISO 9001 2000</th>
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Glossary

Benchmarking
A structured, data-focused process for learning from the practice of others, internally or externally, who are leaders in a field or with whom appropriate comparisons can be made.

Business Areas
Divisions or parts of an organisation/company, with specific product/operational/functional focus and responsibilities. For example, may be a collection of sites, a single site, or operating units sharing larger sites.

Core competency
A well performed internal activity that is central to an organisation’s sustainability or effectiveness.

Corporate governance
Defining and implementing a system of rules, processes, procedures and relationships to manage the organisation and fulfil its legal, financial and ethical obligations.

Culture
The total range of behaviours, ethics and values that are transmitted, practised and reinforced by members of the organisation.

Design
In the Chemical Industry the term design includes, but is not limited to, all the operations normally included in research and development activities where these include the development of both products and processes.

Empowerment
The vesting of employees with necessary skills, knowledge, information and authority in such a way to enable them to take all actions necessary to produce the specified outputs in the most effective and efficient way. A periodic setting of clear targets gives the necessary guidance within the framework of the overall objectives of the organisations.

Environment
The surroundings and conditions in which an organisation operates, including living systems, (human and other).

Ethics
The universal morals that the organisation adopts and abides by.

Excellence
Outstanding practice in managing the organisation and achieving results based on a set of fundamental features.

External organisation
Groups of companies, or other formalised interest groups. For example, may include trade associations, government agencies, lobby groups.

Good/best practice
An error free, proven and documented working practice that exceeds the norms of known, current operational performance within the specific business environment.

Governance
The framework of authority and control within an organisation.

Hazard
Hazard refers to the potential to cause harm. Hazards can be grouped into three broad classes - physical (e.g. flammability, explosivity); health (e.g. acute and chronic toxicity); environmental (e.g. toxicity, ground level ozone creation potential).

Interested Party
Individual or group concerned with or affected by the performance of an organisation.

Key Performance Results
Those results that it is imperative for the organisation to achieve.
Glossary

Leaders
The people who co-ordinate and balance the interests of all who have a stake in the organisation, including the executive team, all other managers and those in a team leadership position or with a subject leadership role.

Management System
The way in which those responsible for the well being and improvement of the organisation’s ability to carry out its purpose enable its policy, values, objectives and targets to be achieved. Management principles based on the idea, supported by administrative systems with formal procedures/documentation/record keeping. The framework of processes and procedures used to ensure that the organisation can fulfil all tasks required to achieve its objectives.

Manufacture
Acquisition of raw materials, conversion to finished products (processes including blending and formulation), storage of raw and intermediates, storage and preparation of finished products for distribution.

Measurement
Ascertains the discrete position of the measured dimension along a qualitative or quantitative scale at a given point in time.

Mission
A statement which describes the purpose, or reason of existence, of the organisation. It describes why the organisation or group exists.

Organisation
A company/companies, comprising one, or a combination of business areas. Should be definable in terms of location and management responsibility (in its entirety or component parts). (In ISO9000 called ‘the supplier’).

People
All of the individuals employed by the organisation including full time, part time, temporary and contract employees.

Performance
A measurement of attainment by an individual, team, organisation or process.

Policy
Long term principles or commitments to implement its vision, values and beliefs.

Process
A sequence of activities that adds value by producing the required outputs from a variety of inputs.

Product
Result of activities or processes. A product can be either intended (offering to customer) or unwanted (e.g. a by product): may be service, hardware, processed materials, software or a combination of these can be tangible (e.g. assemblies or processed materials); or intangible (e.g. knowledge or concepts) or combination of both.

Product Stewardship
Product Stewardship is the responsible and ethical management of the health, safety and environmental aspects of a product from its invention through to its ultimate use and beyond. Product Stewardship is Responsible Care applied to products.

Purchase For Resale product
PFR product
Situation when finished product has been purchased for reselling under an organisation’s own label.

Responsible Care
What the organisation wants to achieve on Responsible Care, how the organisation sees
<table>
<thead>
<tr>
<th><strong>Objectives</strong></th>
<th>itself in the future as a Responsible Care signatory.</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Responsible Care Requirements</strong></td>
<td>The management system requirements that must be delivered by the organisation’s management system, including legal requirements and control requirements.</td>
</tr>
<tr>
<td><strong>Risk</strong></td>
<td>Risk refers to the likelihood that harm may occur from exposure to a hazard. In this document the term includes environmental effects.</td>
</tr>
<tr>
<td><strong>Stakeholder</strong></td>
<td>Any individual or group with a direct interest or involvement who may need to be consulted either formally or informally. For Responsible Care issues these could include, for example, employees and their families, employee representatives, customers, contractors, neighbours, local communities (on activities such as operational sites and transport routes), investors, trade associations, regulatory authorities and the general public.</td>
</tr>
<tr>
<td><strong>Stakeholders</strong></td>
<td>Those groups who affect and/or are affected by the organisation and its activities in some way. These may include, for example, shareholders, employees, trade unions, customers, suppliers, government, regulators, non-governmental organisations, pressure groups and communities.</td>
</tr>
<tr>
<td><strong>Supplier</strong></td>
<td>Any provider of goods or services to the organisation. This includes, for example, raw materials, toll manufacturing, test laboratory service, transport, storage.</td>
</tr>
<tr>
<td><strong>Supply Chain</strong></td>
<td>The integrated structure of activities that procure, produce and deliver products and services to customers. The chain can be said to start with the suppliers of your supplies and ends with the ultimate user of the finished goods.</td>
</tr>
<tr>
<td><strong>Targets</strong></td>
<td>Short term, quantifiable, Responsible Care Goals.</td>
</tr>
<tr>
<td><strong>Toll Manufacture</strong></td>
<td>A supplier who undertakes the whole or a prescribed part of the organisation’s manufacturing process.</td>
</tr>
<tr>
<td><strong>Values</strong></td>
<td>The understandings and expectations that describe how the organisation’s people behave and upon which all business relationships are based, e.g. trust, support, and truth.</td>
</tr>
<tr>
<td><strong>Vision</strong></td>
<td>A statement that describes how the organisation wishes to be in the future.</td>
</tr>
</tbody>
</table>
Cefic - The European Chemical Industry Council

Chemistry making a world of difference

Cefic is the Brussels-based organisation representing national chemical federations and chemical companies in Europe. Cefic represents, directly or indirectly, around 29,000 large, medium and small companies in Europe, which employ about 2 million people and account for more than 30% of world chemicals production.