Moving from RC 14001:2013 to RC 14001:2015

Transition Guide

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Successful businesses understand that it is the present that underwrites the future. Engaging with the commercial aspects of Responsible Care (RC) issues is about the totality of 'now'; not just managing your organization's impacts, but taking action today to manage those impacts that will directly affect your organization and your markets now and into the future.

That's why organizations need continual, robust and wide-ranging environmental, health, safety, security (EHSS) management.

This guide has been designed to help you meet the requirements of the new version of the ACC specification for Responsible Care Management Systems (RCMS), RC 14001:2015, which replaces RC 14001:2013. It defines the requirements for establishing, implementing, maintaining and continually improving an RCMS for any organization, regardless of size.

So why is it changing?

All ISO management system standards are subject to a regular review under the rules by which they are written. Following a substantial user survey the committee decided that a review was appropriate and created the following objectives to maintain its relevance in today's market place and in the future:

- Integrate with other management systems
- Provide an integrated approach to organizational management
- Reflect increasingly complex environments in which organizations operate
- Enhance an organization's ability to address their environmental impacts

RC 14001 was designed to combine elements of the Responsible Care initiative with ISO 14001 for environmental management so that certification would allow organizations to demonstrate conformance to both ISO 14001 and RC 14001.
RC 14001 was originally written with the environment, health & safety, security and transportation (EHSS) in mind and that remains the priority for RC 14001:2015.

NB. *This transition guide is designed to be read in conjunction with the latest available version of RC 14001— Responsible Care management systems — Requirements with guidance for use. It does not contain the complete content of the standard and should not be regarded as a primary source of reference in place of the standard itself.*

What's in the new standard and what are the benefits for organizations?

RC 14001 for Responsible Care Management Systems has been helping ACC members and other organizations in the chemical industry improve their environmental, health & safety, sustainability and operational performance since it was first published in 2002. The new version has been written to maintain its relevance in today's marketplace, and to continue to offer organizations improved performance and business benefits.

With the 2015 version of RC 14001 you can:

- Ensure your EHSS management is aligned with the strategic direction of the organization
- Introduce an integrated approach with other management system standards
- Increase involvement of the leadership team
- Improve environmental performance

It's more detailed than the 2013 version providing greater clarity. This means it is easier to make it relevant to the requirements of your own organization to gain sustainable business improvements.

One of the major changes to RC 14001 is that it brings environmental management and continual improvement into the heart of an organization. This means that the new standard is an opportunity for organizations to align their management system with their strategic direction. In addition, there is an increased focus on improving environmental performance. Organizations will need to take steps to protect the environment and enhance environmental performance.

Our customers tell us they get multiple benefits as a result of implementing and adopting a system that meets the requirements of RC 14001. The new version of the standard will continue to do this and provide additional value.

The technical specification:

- Improves environmental, health, safety and security performance, saving money, reducing waste and preserving natural resources
- Reduces risk and improves opportunity management, ensuring continual improvement is systematic
- Improves lifecycle management, helping identify specific product improvements
- Helps organization identify and comply with legislation, reducing the risk of fines and adverse publicity
- Improves corporate responsibility to meet supply chain requirements
- Motivates and engages staff with more efficient processes
- Drives sustainability

Implementing RC 14001

RC 14001 is part of a family of sustainability and environmental management related standards. You may find this section useful for further reference in addition to RC 14001:

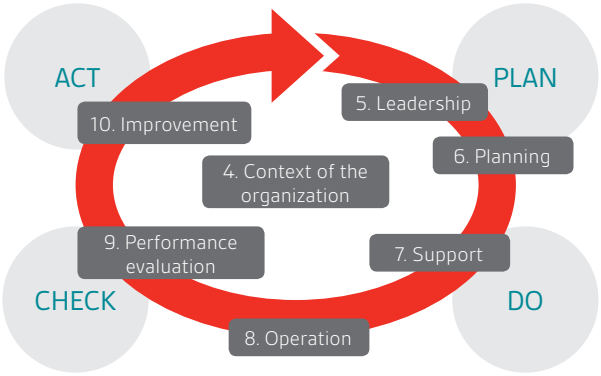
1. ISO 14001:2015, Environmental Management Systems – Requirements with guidance for use
2. ISO 14004:2010, Environmental Management Systems – General guidelines on principles, systems and supporting techniques
3. ISO 14006:2011, Environmental Management Systems – Guidelines for incorporating ecodesign
4. BS EN 14031:2013, Environmental Management – Environmental performance evaluation guidelines
5. RCMS®, Responsible Care Management Systems – technical specification for chemical companies to manage risk
6. ISO 50001:2011, Energy Management – Requirements with guidance for use
7. ISO 20121:2012, Event Sustainability Management Systems – Requirements with guidance for use
8. PAS 2050:2011 – Specification for the assessment of the life cycle greenhouse gas emissions of goods and services
9. PAS 2060:2014 – Specification for the demonstration of carbon neutrality

Comparing RC 14001:2015 with RC 14001:2013

RC 14001 combines elements of the American Chemistry Council's (ACC) Responsible Care initiative with the requirements of ISO 14001, the international standard for environmental management. ISO 14001:2015 is based on Annex SL – the new high level structure (HLS) that brings a common framework to all management systems. This helps to keep consistency, align different management system standards, offer matching sub-clauses against the top-level structure and apply common language across all standards. With the new standard in place, organizations will find it easier to incorporate their environmental management system into the core business processes and get more involvement from senior management.

The Plan-Do-Check-Act (PDCA) cycle can be applied to all processes and to the Responsible Care® management system (RCMS) as a whole. The diagram here (Figure 1) illustrates how Clauses 4 to 10 can be grouped in relation to PDCA.

Figure 1



New/updated concept	Comment
Context of the organization	The range of issues (see below) that can affect, positively or negatively, the way an organization manages its environmental responsibilities
Issues	Issues can be internal or external, positive or negative and include environmental conditions that either affect or are affected by the organization
Interested parties	Much more detail about considering their needs and expectations, then deciding whether to adopt any of them as compliance obligations
Leadership	Requirements specific to top management who are defined as a person or group of people who directs and controls an organization at the highest level
Risk and opportunities	Refined planning process replaces preventive action. Aspects and impacts now part of risk model
Compliance obligations	Replaces the phrase 'legal requirements and other requirements to which the organization subscribes'
Environmental objectives and planning to achieve them	Greater level of detail on environmental objectives which now have to reflect changed planning process (see risk and opportunities above) and include determination of appropriate indicators
Communication	There are explicit and more detailed requirements for both internal and external communications
Documented information	Replaces documents and records
Operational planning and control	Generally more detailed requirements, including a consideration of procurement, design and the communication of environmental requirements 'consistent with a life cycle perspective'
Performance evaluation	Covers the measurement of EMS, operations that can have a significant environmental impact, operational controls, compliance obligations and progress towards objectives
Evaluation of compliance	More detailed requirements relating to maintaining the knowledge and understanding the status of compliance levels
Nonconformity and corrective action	More detailed evaluation of both the nonconformities themselves and corrective actions required
Management review	More detailed requirements relating to inputs and outputs of the review

The key requirements of RC 14001:2015

Clause 1: Scope

This clause still relates to the scope or coverage of the standard to help organizations achieve the intended outcomes of its RCMS. It now references undertaking environmental management that includes a consideration of a 'life cycle perspective'.

Clause 2: Normative references

As in earlier versions of RC 14001, there are no normative references (e.g. other additional requirements in other standards) that have to be considered. The clause is retained in order to maintain the same numbering scheme as all the other management system standards.

Clause 3: Terms and definitions

At first sight, the listing of terms and definitions seems confusing as they are not in alphabetical order. Instead, the approach stipulated by ISO and new to many users, is that terms and definitions have been grouped into organization and leadership, planning, support and operation and performance evaluation and improvement. Readers new and old may find it easier to use this listing in conjunction with the alphabetical listing in Annex C.

In addition, those operating under an earlier version of the technical specification will want to pay particular attention to the meaning of other terms included for the first time in ISO 14001, such as 'environmental condition', 'process', 'compliance obligations,' 'life cycle' and 'documented information.' The same is true for the older version of RC 14001; additional RC terms have been updated, including 'Responsible Care' and 'hazard.' New terms 'operational energy efficiency' and 'product incident', though referenced in the text of the previous standard, are now clearly defined in RC 14001:2015.

Clause 4: Context of the organization

The intent of this clause is to provide a high-level, strategic understanding of the important issues that can affect, either positively or negatively, the way the organization manages its EHSS responsibilities. It gives an organization the opportunity to identify and understand factors and parties that affect the intended outcome(s) of the RCMS. This also, in part, addresses the old concept of preventive action.

Firstly, the organization will need to determine external and internal issues that are relevant to its purpose. For example, what are the relevant issues, both inside and out, that have an impact on or affect its ability to achieve the intended outcome(s) of the RCMS?

It should be noted that the term 'issue' covers not only problems, which would have been the subject of preventive action in the previous standard, but also important topics for the RCMS to address, such compliance obligations that the organization might set for the RCMS. Importantly, those issues should include not only EHSS conditions that the organization can affect but also those that can affect the organization. Some further general guidance on 'issues' is given in Clause 5.3 of ISO 31000:2009.

Secondly, an organization will also need to identify the 'interested parties' relevant to their RCMS, which is far more prominent in this version of the standard. These groups could include customers, unions, communities, suppliers and government organizations. Determining their relevant needs and expectations is now part of establishing the context for the RCMS operation. Each organization will identify their own unique set of 'interested parties' and these may change overtime.

Once the context has been established, the scope of the RCMS has to be determined in relation to various additional factors. Those who have used the earlier version of the standard should review their current scope and be able to demonstrate that it meets these specific requirements.

Finally, the last requirement of Clause 4 is to establish, implement, maintain and continually improve the RCMS in accordance with the requirements of the technical specification. This requires the adoption of a process approach and although every organization will be different, documented information such as process diagrams or written procedures could be used to support this.

Clause 5: Leadership

This clause places requirements on 'top management' which is the person or group of people who directs and controls the organization at the highest level. Note that if the organization that is the subject of the RCMS is part of a larger organization, then the term 'top management' may refer to the smaller organization. The definition of top management will depend on if you have a single-site certificate (plant manager) or multi-site certificate (division head/president). The purpose of these requirements is to demonstrate leadership and commitment by leading from the top and integrating environmental management into business processes.

Top management must demonstrate a greater involvement in the management system and must ensure that the requirements are integrated into the organizations processes and that the policy and objectives are compatible with the strategic direction of the organization. A particular responsibility of top management is to establish the Responsible Care® policy, and the standard defines the characteristics and properties that the policy is to include. This can include commitments specific to an organization's context beyond those directly required, such as the 'protection of the environment'

There is also a greater focus on top management to commit to continual improvement of the RCMS to enhance Responsible Care/ health, safety and security performance and they must reflect a commitment to the Responsible Care Guiding principles. Communication is key as well, and top management have a responsibility to promote openness and ensure the RCMS is made available, communicated, maintained and understood by all parties.

Finally, the clause places requirements on top management to assign relevant responsibilities and authorities, in order to 'facilitate environmental management', highlighting two particular roles concerning RCMS conformance to RC 14001 and recognizing and reporting on Responsible Care-related performance.

Clause 6: Planning

Taken as a whole, Clause 6 probably presents the greatest area of change for users of earlier versions of the technical specification. It works with Clauses 4.1 'context of the organization' and 4.2 'interested parties' to complete the new way of identifying and managing preventive actions. It focuses the organization on the development and use of a planning process, rather than a procedure to address both a range of factors and the risk associated with such factors. Additional RC requirements introduced in the revised standard include to assess and prioritize transportation risk as well as the update to 'chemical-related' processes in what hazard and risk information needs to be maintained.

The first part of this clause defines what needs to be considered, determined and addressed when establishing, implementing and maintaining the processes to meet the requirements of the planning clause. Sub clause 6.2.1 requires the organization to determine the environmental, health, safety and security aspects of it activities, products and services, that it can control and influence within the defined scope. This is broadly aligned with earlier versions of the technical specification. For the first time, there is an explicit reference to abnormal and emergency situations. Even more importantly, the reference to a consideration of a life cycle perspective and the clause notes highlights that significant aspects can give rise to risks that are both beneficial and adverse. In aligning with the principles and guidance given in ISO 31000, this clause is now a precursor to further risk identification.

Similar to the requirements in the 2013 version, another factor within this clause is the term 'compliance obligations' which replaces the term 'legal and other requirements' used in the earlier standard, though the term 'legal and other requirements' may still be used. In many cases, the basic approach to the identification and use of information by the organization in relation to this area will still meet the new requirements.

Clause 6.1.1 represents a new requirement for organizations to determine the risks and opportunities that arise from Clause 4.1 'context of the organization', Clause 4.2 'interested parties', Clause 6.1.2 'environmental aspects' and finally Clause 6.1.3 'compliance obligations'. As risk is defined as the 'effect of uncertainty on environmental objectives' there is a direct link here to the intended outcomes of the EMS, which will obviously include basic principles such as the prevention of pollution and the maintenance of legal compliance.

There are new requirements for 'Planning to take action'. This takes the more holistic approach required by the previous clause and harnesses it to action planning at a more detailed level. This will ensure that the outputs of the planning process are measurable and sufficiently complete to form a solid foundation for the rest of the system.

Finally, the last part of the clause considers 'environmental objectives and planning to achieve them'. The organization shall establish environmental objectives at relevant functions and levels. As well as being consistent with the environmental policy, environmental objectives must be measureable, monitored, communicated and updated.

In planning to achieve them, there is now a specific requirement to determine how the results of actions will be evaluated using indicators for monitoring progress. For further guidance on setting performance indicators relevant to environmental management, see ISO 14031 – Environmental performance evaluation guidelines.

Clause 7: Support

This clause begins with a requirement that organizations shall determine and provide the necessary resources to establish, implement, maintain and continually improve the EMS/RCMS. Simply put, this is a very powerful requirement that covers all Responsible Care resource needs. As is true with the other clauses, the additional RC requirements in clause 7 all outline the need to include Responsible Care/health, safety and security in all support-related processes.

The clause continues with requirements for competence and awareness, which are similar to their counterparts in ISO 14001:2004 and RC 14001:2013. Organizations will need to determine the necessary competence of people doing work under its control that affect its environmental performance as well as its ability to fulfill its compliance obligations and ensure they receive the appropriate training. Within this clause there is a requirement to retain documented information as evidence of competence.

In addition, organizations need to ensure that all people doing work under the organizations control are aware of the Responsible Care policy, how their work may impact this and implications of not conforming with the RCMS. They need to be aware of their contribution to the effectiveness of the management system, including the benefits of enhanced Responsible Care performance. While there is no fundamental change from the previous version of the technical specification, there are now additional requirements covering both internal and external communication. This includes the need for dialogue with employees and other interested parties about the organization's impact on human health, safety, security and the environment as well as managing relevant risks for products, chemical-related processes and activities associated with its operations. Specifically with external communication, the organization must also make product safety and product stewardship information publicly available.

Finally, there are requirements for 'documented information', which is a new term that replaces the 'documents' and 'records' references in the previous technical specification. These requirements relate to the creation and updating of documented information and their control. The requirements are similar to their counterparts in ISO 14001:2004 and RC 14001:2013 for the control of documents and for the control of records.

Clause 8: Operation

This clause deals with the execution of the plans and processes that are the subject of previous clauses and includes the execution of the actions determined in relation to both Clause 6.1, as well as Clause 6.2. In addition, there are new, more specific requirements that relate to the control or influence exercised over outsourced processes.

A potentially even larger change for users of the earlier technical specification exists in relation to the new broader requirement to

consider certain operational aspects 'consistent with a life cycle perspective.' This means giving serious consideration to how actual or potential environmental impacts – happening upstream and downstream – of an organization's site-based operations are influenced or (where possible) controlled.

The new areas detailed in this clause include the procurement of products and services, and controls to ensure that environmental/EHSS requirements relating to design, delivery, use and end-of-life treatment of an organization's products and services are considered at an appropriate stage. This requires documented information that takes into account raw material, product, waste material and transportation incidents. The organization must consider the need to provide information about potential significant environmental impacts associated with the transportation or delivery, use, end-of-life treatment and final disposal of its products and services. An added RC requirement for this clause calls for participation in mutual assistance programs and sharing activities as embodied in Responsible Care.

Clause 9: Performance evaluation

Performance evaluation covers many of the areas previously featured in Clause 4.5 and 4.6 of the 2013 version. As a general recommendation, organizations should determine what information they need to evaluate the environmental/EHSS performance and effectiveness. Work backwards from this 'information need' to determine what to measure and monitor, when, who and how. Documented information that provides evidence of this must be retained.

There is now more detailed requirements in sub clause 9.1.2, around the evaluation of compliance, especially the requirement to maintain 'knowledge and understanding of its status of conforming with compliance obligations.'

Internal audits must also be conducted at planned intervals with management reviews taking place to review the organizations management system and ensure its continuing suitability, adequacy and effectiveness. Similarly with all the previous clauses, the organization must also include Responsible Care/health, safety and security in all above.

Clause 10: Improvement

Due to the new structure and risk focus of the standard, there are no preventive action requirements in this clause. However, there are some new, more detailed corrective action requirements. The first is to react to nonconformities and take action, as applicable, to control and correct the nonconformity and deal with the consequences. The second is to determine whether similar nonconformities exist, or could potentially occur elsewhere in the organization, leading to appropriate corrective actions across the whole organization, if necessary. Although the concept of preventive action has evolved, there is still a need to consider potential nonconformities, albeit as a consequence of an actual nonconformity. The organization is required to identify and investigate the cause of accidents and incidents, assign significance, take appropriate corrective action to prevent reoccurrence and share key findings and associated corrective actions with relevant interested parties.

The requirement for continual improvement has been extended to ensure that the suitability and adequacy of the EMS/RCMS as well as its effectiveness are considered in the light of enhanced environmental performance.

The change has brought some changes to the terminology used, as is shown in the table below.

Major differences in terminology between RC 14001:2013 and RC 14001:2015

RC 14001:2013	Was not defined in RC 14001:2013
Organization	Documented information
Interested party	Compliance obligation
Environment	Environmental condition
Environmental management system	Process
Corrective action	Top management
Continual improvement	Life cycle
Internal and external interested parties	Risk
	Operational energy efficiency
	Product incident

Documented information

As part of the alignment with other management systems standards, a common clause on 'documented information' has been adopted.

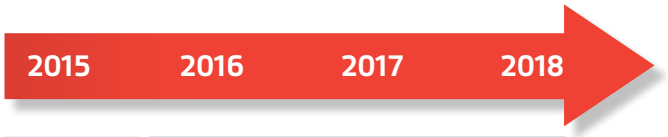
The terms "documented procedure" and "record" have both been replaced throughout the requirements text by "documented information". Where RC 14001:2013 would have referred to documented procedures (e.g. to define, control or support a process) this is now expressed as a requirement to maintain documented information. Where RC 14001:2013 would have referred to "records," this is now expressed as a requirement to retain documented information. Requirements to maintain documented information are detailed throughout the standard and some examples are given.

Note: documented information may be required by the standard, by a regulation or by your process in order to maintain control. Please read the standard carefully, particularly Clause 7.5.

4.3	Scope
5.2	Policy
6.1.1	General documented processes to meet requirements of 6.1 - Information to the extent necessary to have confidence that the processes have been carried out as planned • Documented information of risks and opportunities that needs to be addressed
6.1.2	Need to have documented information on: • criteria used to determine its environmental aspects; • environmental aspects and associated environmental impacts; • significant environmental aspects
6.1.3	Documented information of compliance obligations
6.2.1	Documented information on environmental objectives
7.2	Documented information as evidence of competence
7.4.1	Documented information as evidence of communication
7.5.1	Documented information required by this International Standard as well as documented information, determined by the organization, as being required for the effectiveness of the environmental management system
7.5.3	Documented information of external origin determined by the organization to be necessary
8.1	Documented information to the extent necessary to have confidence that the processes have been carried out as planned
9.1.1	Evidence of monitoring, measurement, analysis and evaluation results
9.1.2	Evidence of compliance evaluation results
9.2.2	Evidence of the implementation of the audit programme(s) and the audit results
9.3	Documented information as evidence of the results of the management reviews
10.2	Information of the nature of the nonconformities and any subsequent actions taken, and the results of any corrective action.

Transition guidance

ISO 14001:2015 Transition Timeline



September 2015 publication	September 2015 start of three year transition period to September 2018

Note: your transition audit must be completed before June 1, 2018 to ensure your current certificate does not expire

Transition is an opportunity – What do you need to do?

1. Take a completely fresh look at your RCMS
2. Attend a Responsible Care event to understand the differences between versions of the standard
3. Highlight the key changes as opportunities for improvement
4. Make changes to your documentation processes to reflect the new structure (as necessary)
5. Implement new requirements on leadership, risk and context of organization
6. Review effectiveness of your current control set
7. Assume every control in place may have changed
8. Carry out an impact assessment and gap analysis

Your transition journey

BSI has identified a step-by-step journey to help you through the transition and realize the benefits of RC 14001:2015. We have mapped out a framework which guides you through the options and support available from BSI to ensure you have the knowledge and information you require.

Get a copy of the RC 14001:2015 Standard. This will help you become familiar with the new requirements, terminology and layout; obtain your copy through the ACC store

Visit the BSI and ACC websites to access the most up-to-date support and transition material available at **bsiamerica.com** or **responsiblecare.americanchemistry.com** for more information to help you understand the changes

Look at the wide range of BSI transition training courses available to make sure you fully understand the changes, including introduction and implementing courses as well as specific deep-dive modules designed to help you understand core ISO Standard requirements

Consider further services to help implement the changes. BSI has a full range of services available for your journey to adopting and implementing the new standard, including gap assessments to evaluate your readiness and Entropy™ and Action Manager software to help you manage your systems.

Compare the differences between ISO 14001:2004 and ISO 14001:2015

which reflect RC14001:2013 and RC14001:2015

Download our mapping guide, which provides an overview of the changes, deletions, new or enhanced requirements between ISO 14001:2004 and ISO 14001:2015

Visit **bsigroup.com/iso14001revision-us**

Additional resources

There are a variety of materials that can be accessed online at www.bsigroup.com/en-US, including:

The importance of leadership

The new standard has an entire clause devoted to leadership and is one of the most significant changes. This whitepaper explains why management are now required to take a more active role in the QMS/EMS to ensure it is implemented, embedded, communicated and maintained.

Introducing Annex SL

The new generic framework with core text, common terms and definitions and the blueprint for all management system standards going forward – understand more about the structure in our whitepaper.

REVISED: ISO 14001 Frequently Asked Questions

Here we aim to address those initial questions that you may have as your begin your journey towards the new standard.

PLUS:

- Old-to-new ISO 14001 Mapping Guide, which reflects RC14001
- Self-assessment checklist
- Transition Journey to the new ISO 14001:2015, which also reflects RC14001
- CEO Briefing

Additional services

We also have a wide range of services to help you to implement the changes and understand how well you are doing. These include:

Gap assessment

A transition gap assessment is a pre-assessment service where we take a closer look at your transition plan and Environmental Management System, comparing it with the requirements of RC 14001:2015. As a first step in your transition journey with BSI, the gap assessment can help confirm the areas of your system already compliant and any gaps in your system, saving you time and money.

Business improvement tools

When you implement the revised standard, it's extremely important to manage and maintain it in the most efficient manner possible. Best practice organizations do this by deploying business improvement tools, such as BSI Action Manager or Entropy™ software. As one of our clients told us, "it's literally like having an extra member of the team." Clients using this tool have experienced 50% reduction in the time to implement their management system.

Why BSI?

BSI has been at the forefront of ISO 14001 and RC 14001 since the start. And ISO 14001 was originally based on BS 7750, the first environmental management system standard, which was developed by BSI in 1992, the year of the first Earth Summit in Rio. That's why we're best placed to help you understand and transition to the new standard.

At BSI, we don't just audit standards, we create them, which makes us uniquely qualified to understand and interpret their intent and ensure you get the greatest value from your system. We create excellence by driving the success of our clients through standards. We enable others to perform better, manage risk and achieve sustainable growth.

For over a century, our experts have been challenging mediocrity and complacency to help embed excellence into the way people and products work.

We make excellence a habit.

Our products and services

We provide a unique combination of complementary products and services, managed through our three business streams: Knowledge, Assurance and Compliance.

Knowledge

BSI works with business experts, government bodies, trade associations and consumer groups to capture best practice and structure the knowledge all organizations need to succeed. The majority of the widely used and implemented international standards were originally shaped by BSI, for example ISO 9001 for Quality Management and ISO/IEC 27001 for Information Security.

Assurance

Independent assessment of the conformity of a process or product to a particular standard ensures that our clients perform to a high level of excellence. We help our clients understand how they are performing, thereby identifying areas of improvement from within.

Compliance

To experience real, long-term benefits, our clients need to ensure ongoing compliance to a standard so that it becomes an embedded habit. We train our clients to understand standards and how to implement them, as well as provide added value and differentiated management tools to facilitate the process of ongoing compliance.

To find out more visit:

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