1.0 PURPOSE

1.1 To ensure that the American Chemistry Council’s (ACC) Responsible Care Third-Party Audit Requirement sustains public confidence and acceptance by defining the qualification requirements for Audit Service Provider (ASP) companies.

1.2 To ensure that the ASP approval process will be administered consistently and fairly, according to ACC procedures.

1.3 To prevent conflicts of interest that might influence ASP’s findings or recommendations or public perceptions of the credibility of the ACC’s Responsible Care Third-Party Audit Requirement.

2.0 SCOPE

2.1 This procedure applies to all ASPs providing RCMS auditing services.

3.0 TERMS AND DEFINITIONS

3.1 **ANSI-ASQ National Accreditation Board** – American Chemistry Council’s designated oversight body for the RCMS certification process.

3.2 **ANAB RCMS Symbol** – mark awarded to approved Audit Service Providers which shall be affixed to RCMS Certificates and Letters of Conformity.

3.3 **Audit Service Provider (ASP)** – The third party auditing company that is employed to conduct RCMS audits.

3.4 **Major Nonconformity** – Nonconformity (3.6) that based on objective evidence, the absence of, or a significant failure to implement and/or maintain conformance to the requirements of the RCMS Technical Specification. (i.e. the absence of or failure to implement a complete Management System clause of the standard); or a situation which would, on the basis of available objective evidence, raise significant doubt as to the capability of the Management System to achieve the stated policy and objectives.

3.5 **Minor Nonconformity** - nonconformity (3.6) that does not affect the capability of the management system to achieve the intended results

3.6 **Nonconformity** - non-fulfilment of a requirement
3.7 **RCMS Certificate (Option 1)** – one option for recognizing a HQ, facility or company which has successfully completed its RCMS audit and maintained periodic surveillance audits (see Appendix 1).

3.8 **RCMS Statement of Conformity (Option 2)** - one document option for recognizing a HQ or facility which has successfully completed its RCMS audit. A RCMS Statement of Conformity (may be referred to under various names) is not supported by surveillance audits. (See Appendix 1)

Note: In some cases, a RCMS Certificate (Option 1) or RCMS Statement of Conformity (Option 2) may recognize an entire company (i.e., single location constituting both HQ and facility, single location such as office which constitutes the entire ACC member’s/Partner’s operations, etc.)

(Additional definitions related to determining audit duration appear in Appendix 2)

4.0 **RESPONSIBILITIES**

4.1 **RCMS Audit Service Provider (ASP) Requirements**

4.1.1 The ASP shall be responsible for conformity with all requirements set forth in this document and for ensuring that all competencies are current and in conformance with its requirements. Only approved ASPs may provide RCMS audit services. ASPs shall obtain approval from ACC’s designated approval body, ANSI-ASQ National Accreditation Board (ANAB), prior to issuing RCMS Certificates or Letters of Conformance. Information on RCMS ASP approval can be obtained at [www.anab.org](http://www.anab.org). The ASP shall provide ANAB satisfactory evidence of conformity to Sections 5-16 below as well as be subject to an initial office and onsite witness audits prior to obtaining approval and permission to use the ANAB RCMS symbol.

4.1.2 ASPs which conducted RCMS audits prior to the publication of this procedure shall provide ANAB with evidence of conformity to this document’s requirements through an office audit prior to obtaining permission to use the ANAB RCMS symbol.

4.1.2.1 All ASPs shall also be subject to one witness RCMS audit to be conducted during the period January 1, 2017 – December 31, 2019 and annual office audits.

*Note: ANAB and individual ASPs shall collaborate in determining the most efficient and cost-effective manner for conducting office assessments*

4.1.3 After January 1, 2020, ANAB shall conduct annual RCMS office audits and one RCMS witness audit per designated ACC Audit Cycle for each approved ASP.
5.0 Legal Status

5.1 The ASP shall be a legal entity and be responsible for, and shall retain authority for, its decisions relating to RCMS certification. The ASP shall ensure financial arrangements exist to cover any liabilities arising from its RCMS-related activities, including, but not limited to, audits.

6.0 Conflicts of Interest

6.1 The ASP shall have policies and procedures that ensure the independence of audits from any other service activities related to Responsible Care management systems implementation consulting and RCMS training tailored for clients.

6.1.1 If the audit is carried out by an ASP that is a legal entity of a larger organization, the links with other parts of the organization shall be documented and available for review by ACC’s approval body and any client company. Relevant information on activities performed by the other parts of the organization shall be provided.

6.1.2 The ASP shall have policies and procedures that distinguish between auditing and any other activities that the larger organization is engaged (such as, but not limited to, training, consulting, etc.).

6.1.3 The ASP shall ensure that none of its clients is given the impression that use of other services would bring any business/auditing advantages to the client.

6.1.4 The ASP shall say nothing to suggest or indicate that an RCMS audit would be simpler, easier or less expensive if any other specified services offered by the ASP or its affiliated organization were purchased.

6.1.5 The ASP may list RCMS audit services as part of a larger suite of services on its web pages or in general marketing materials provided the requirements in Section 6.1.4 are followed.

Note: For those ASPs that also offer RC 14001 services, the ASP will assure conformity with relevant provisions of ISO 17021-1.

6.1.6 The ASP shall not be retained to audit a management system for which the ASP or an affiliated entity provided Responsible Care management systems-related consulting services within the preceding two years.
7.0 Personnel

7.1 The ASP shall have processes to ensure its auditors meet the ACC requirements for auditor competence, training, certification and continuing professional development (see RC205 for auditor requirements).

7.2 The ASP shall ensure that auditors and other personnel engaged in marketing, planning, scheduling, audit team assignment, certificate/statement of conformity decisions and other activities related to RCMS services are aware of RCMS’ requirements for ACC members and Responsible Care Partners identified in RC501 (current version) as well as general Responsible Care program requirements (i.e., codes, metrics, etc.).

7.3 In the event ACC extends use of the RCMS Technical Specification and RCMS audits to other trade associations and/or geographies, ASPs offering services to these organizations/geographies shall ensure that auditors and personnel engaged in marketing, planning, scheduling, audit team assignment, certificate/statement of conformity decisions and other activities related to RCMS services are aware of RCMS’ requirements established by ACC as well as any unique Responsible Care program requirements for these trade associations/geographies.

7.3.1 It shall be the responsibility of ACC to communicate to ASPs information on new RCMS trade associations/geographies utilizing RCMS.

7.4 The ASP shall ensure the satisfactory performance of all personnel involved in the RCMS audit and certification activities. The ASP shall establish a process for monitoring and measurement of the performance of all persons, involved in providing RCMS services based on the frequency of their usage and the level of risk linked to their activities.

7.5 The ASP shall maintain up-to-date personnel records, including relevant competence, training and experience.

8.0 RCMS Certification/Conformity Audit

8.1 General Requirements for the ASP

8.1.1 Working with its client, the ASP shall develop an audit plan for each audit which takes into consideration the size of the client, the scope, risk and complexity of its Responsible Care management system, products and processes, security-related matters as well as demonstrated level of management systems effectiveness and results of any previous audits. The
plan shall serve as the basis to an agreement regarding conduct and scheduling of the audit activities.

*Note: ASPs retain flexibility in tailoring audits to meet the unique needs of clients.*

8.1.2 The ASP shall have a process for selecting and appointing the audit team members, including the audit team leader, taking into account the competence needed to achieve the objectives of the audit.

8.1.3 The ASP shall have a process for determining audit time utilizing the process defined in Appendix 2.

8.1.4 The tasks given to the audit team shall be defined and made known to the client, and shall require the audit team to:

- Examine and verify the structure, policies, procedures, records and related documents of the client relevant to the RCMS;
- Determine that these meet all the requirements relevant to the intended scope of audit and the RCMS Technical Specification;
- Determine that the processes and procedures are established, implemented and maintained effectively, to provide a basis for confidence in the client’s RCMS; and,
- Communicate to the client any inconsistencies between the client’s policy, objectives and targets and the results.

8.1.5 The ASP shall provide the name(s) of and, when requested, make available background information on each member of the audit team, with sufficient time for the client to object to the appointment of any particular auditor and for the ASP to reconstitute the team in response to any valid objection.

*Note: An audit team may constitute a single individual.*

8.1.6 The audit plan shall be communicated and dates of the audit agreed upon, in advance, with the client.

8.1.7 The ASP shall have a consistent process for conducting on-site audits.

8.1.8 The ASP shall provide a written report for each audit with sufficient detail to support the ASP’s decision to issue a Statement of Conformity or Certificate. The report shall identify areas of conformity and non-conformity with the management system (minor and/or major as applicable). The audit team may identify opportunities for improvement. The ASP shall not recommend specific solutions for addressing non-conformities or opportunities for improvement.
8.1.9 The ASP shall require the client to analyze the cause and describe the specific correction and corrective actions taken to eliminate detected non-conformities, within a defined timeframe.

8.1.10 The ASP shall review the corrections and corrective actions submitted by the client to determine if these are acceptable.

8.1.11 The client shall be informed if an additional full audit, an additional limited audit, or additional documented evidence will be needed.

8.1.12 The ASP shall ensure that the person(s) that make the statement of conformity or certification decision are different than those that carried out the audits.

9.0 Audit Preparations by the ASP

9.1 The ASP shall require the client, to provide the necessary information to enable it to establish the following:

- The desired scope of the audit and certification;
- The general features of the client organization, including name, location, type of operations and products and relevant legal obligations (e.g., OSHA PSM, RMP, DOT, etc.);
- Relationship of the client within a larger organization; and,
- Outsource processes used by the organization which may affect conformity with RCMS.

9.2 Prior to proceeding with the audit, the ASP shall review the information to ensure that:

- The information about the client and its RCMS is sufficient to plan (e.g., competence, duration) and for the conduct of the audit;
- The requirements for certification are clearly defined and documented, and have been provided to the client;
- Any known difference in understanding between the ASP and client is resolved; and,
- The scope of the certification sought, locations of the client organization’s operations, time required to complete audits and other points influencing the audit activity are taken into account (e.g., language, safety conditions, security requirements, potential threats to impartiality, etc.).

9.3 The audit team shall be appointed, taking into account the competencies necessary to effectively audit the client and the RCMS.
10.0 Conducting the Audit

Certification audit

10.1 The ASP is required to conduct a full system audit prior to initial certification/statement of conformity. The full system may be in one audit event or two audits (Stage 1 and 2). However, the ASP and client may choose to conduct a Stage 1 audit to determine the readiness of the client for certification/conformity audit (Stage 2).

10.2 If the client conducts a Stage 1 audit, it shall be performed to:

- audit the client’s management systems documentation;
- evaluate the client’s location for site-specific conditions and to undertake discussions with the client’s personnel to determine preparedness for the Stage 2 audit;
- review the client’s status and understanding regarding the requirements of the technical specification, in particular with respect to the identification of key performance, prioritized risks, processes, objectives, legal requirements and operation of the management system;
- review, as necessary, other Responsible Care-related requirements;
- review allocation of resources for Stage 2 and agree on details of the audit; and
- verify that risk/complexity assignment is appropriate with on-site verification and an appropriate number of audit days have been allocated; and
- evaluate if the internal management systems and management review are being performed, and that the level of implementation of RCMS substantiates that the client is ready for Stage 2.

Note: Some Stage 1 activities may be conducted remotely at the discretion of the ASP.

10.2.1 Stage 1 audit findings shall be documented and communicated to the client, including any areas of concern that could be classified as a nonconformity during the Stage 2 audit.

10.2.2 In determining the interval between Stage 1 and Stage 2 audits, consideration shall be given to the needs of the client to resolve areas of concern identified during the Stage 1 audit.

10.3 The purpose of the Stage 2 audit is to evaluate the implementation, including effectiveness, of the client’s management system. The audit shall take place at the client’s location (HQ, Facility). It shall include at least the following:

- Information and evidence about conformance to all requirements of RCMS;
• Performance monitoring, measuring, reporting and reviewing of key performance objectives and targets;
• the client’s management system and performance as regards legal compliance;
• operational control of the organization’s processes;
• internal auditing and management review;
• management responsibility for the client’s policies; and
• links between RCMS requirements, policy, performance objectives and targets, any applicable legal requirements, responsibilities of personnel, operations, procedures, performance data and internal findings and conclusions.

10.4 The audit team shall analyze all information and audit evidence to review the audit findings and agree on the audit conclusions.

10.5.1 The ASP shall inform the client whether a follow-up visit, in the event that major nonconformities are identified, is needed to determine that the nonconformities have been corrected.

10.5.2 If nonconformities have been identified, but a follow-up visit is not warranted, the ASP shall instruct the client to submit a timely corrective action plan for review.

10.5 The information provided by the audit team to the ASP for the statement of conformity or certification decision shall include:

• The audit report(s);
• Comments on observed positive or best/excellent practices
• Comments on nonconformities and, where applicable, the correction and corrective actions taken by the client;
• Confirmation of the information provided by the client to the ASP (see Section 9.1); and,
• A recommendation whether or not to grant certification, together with any conditions or observation.

10.6 The ASP shall make the statement of conformity or certification decision on the basis of an evaluation of the audit findings and other relevant information.

11.0 Surveillance Audits

11.1 While not required by ACC for RCMS, some clients request surveillance audits to support their certification status (under Option 1). If the ASP offers surveillance audits as part of its RCMS services, these audits shall ensure that representative areas and functions
covered by the scope of the management system are monitored on a regular basis and take into account changes to the client and its management system.

11.2 Surveillance audits are on-site audits but are not necessarily full system audits, and shall be planned so that the ASP can maintain confidence that the RCMS continues to fulfill requirements between certification audits. The surveillance audits shall include a review of:

- Internal audits and Management Review;
- Actions taken on nonconformities identified on the previous audit;
- Effectiveness of the RCMS with regard to achieving the client’s objectives;
- Progress on planned activities aimed at continual improvement;
- Continuing operational control; and
- Any changes to management system.

11.3 Certification of the client shall be maintained based on evidence that the client continues to satisfy the requirements of the RCMS Technical Specification.

11.4 Surveillance audits, if elected by the client, shall be conducted at least once per year. The date of the first surveillance audit following initial certification shall not be more than 12 months from the certification decision. Recertification of the location shall occur no later than 36 months after the initial certification.

11.5 Prior to offering surveillance audits, the ASP shall inform the client that this is an option under RCMS and not a requirement.

12.0 Multi-Site Certificates

12.1 ASPs may elect to issue RCMS (Option 1) certificates which cover multiple locations under a single certificate. If the ASP offers this option, its process shall conform to guidance found in the International Accreditation Forum’s Mandatory Document 1 (current version) and any other relevant IAF documents.

12.2 Prior to offering multi-site certification, the ASP shall inform the client that this is an option for ACC companies and not a requirement.

13.0 RCMS certification document

13.1 The ASP shall issue a certification document upon the client completing all the requirements necessary to support the audit decision. There will be two types of certification documents:
13.1.1 RCMS Certificate (Option 1) – This type of document is to be used when the client conducts surveillance audits and the effective dates can span three (3) years from the date of the certification decision. (Refer to Option 1 in Appendix 1)

13.1.2 RCMS Statement of Conformity (Option 2) – This document will state that as of the date of issue, the organization’s management system was conforming to the requirements found in the RCMS Technical Specification. The effective date will correspond to the date the document is issued. It cannot span a period of time. This type of document is used when a client elects not to conduct surveillance audits.

Note: The absence of an expiration date on an RCMS Statement of Conformity should not be inferred to mean “in perpetuity” as the ACC member/Responsible Care Partner is expected to fulfill its Responsible Care Third-Party Audit Requirement in each subsequent ACC Audit Cycle.

14.0 Records

14.1 The ASP shall maintain records on the audit activities of its RCMS clients. Records shall include:

- Information supplied by the client (see Section 9.1) and audit reports including reports from any necessary follow-up visits to close nonconformities.
- Audit time determination
- Evidence of correction and corrective action plans which have been reviewed and accepted by the ASP
- Records of complaints and appeals and any subsequent correction or corrective actions
- Documentation of Certification decisions

Note: Documentation of Certification decisions can include copies of Certificates or Statements of Conformity

14.2 The ASP shall maintain records in a secure manner to ensure confidentiality

14.3 The ASP shall have processes for the retention of records. Records shall be retained for the duration of the current ACC-designated cycle plus one full additional cycle.

15.0 Quality Assurance
15.1 The ASP shall have a quality assurance policy and processes in place for all activities associated with RCMS auditing services to ensure the requirements of this procedure are effectively implemented.

15.2 The ASP shall have policies and procedures for resolution of complaints, appeals and disputes received from any client related to any aspect of the RCMS certification audit.

16.0 ASP-ACC Interaction

16.1 The ASP shall designate a member of its staff as a primary contact with client organizations, ACC and ANAB on all matters related to the RCMS certification process.

16.2 The ASP will ensure that the ACC and ANAB have access to audits for witness purposes and the ASP shall communicate this requirement to potential clients.

17.0 ACC Responsibilities

17.1 ACC shall maintain a list of all approved ASPs and any candidate ASPs on its website at www.americanchemistry.com
Appendix 1
RCMS Certificate/Statement of Conformity Instructions

Upon a decision to grant RCMS certification to a client, the ASP shall issue either a RCMS Certificate or a RCMS Statement of Conformity. The ASP will select one of the following options based the client’s decision regarding ongoing surveillance to maintain certification status. Both options are sufficient to fulfill ACC’s Responsible Care Third-Party Audit Requirement.

Option 1 - RCMS® Certificate

Option 1 certificates are supported by ongoing surveillance audits and satisfactory demonstration of the RCMS’ maintenance. Under Option 1, client locations shall receive a certificate upon successful completion of their RCMS audit. The certificate shall include the following information:

1. Name and address of the location of the audited entity
2. Scope of the RCMS
3. Technical Specification Name and Identifying Number (Ex. RCMS; RC101.xx) which clearly acknowledges the version used
4. Date of Issue or effective date. (cannot pre-date the certification decision date)
5. Unique certificate identification number
6. Mark of the ASP
7. ANAB RCMS Approval Symbol
8. Three-year expiration date

Option 2 - RCMS® Statement of Conformity

Under Option 2, client locations shall receive a Statement of Conformity upon successful completion of their RCMS audit. The Statement of Conformity shall include the following information:

1. Name and address of the location of the audited entity
2. Scope of the RCMS
3. Technical Specification Name and Identifying Number (Ex. RCMS; RC101.xx)
4. Date of Issue (cannot pre-date the ASP decision)
5. Unique certificate identification number
6. Mark of the auditing company
7. ANAB RCMS Approval Symbol

Audits conducted under Option 2 do not require surveillance audits and shall not carry a three-year expiration date. The date of issue only will appear on the Statement of Conformity. ASPs shall not be required to provide any assurances about the RCMS beyond the date of issue appearing on the certificate.

A Statement of Conformity may be formatted in a manner suitable for display by the organization.
Information not appearing on Certificates or Statements of Conformity

- Reference to the ACC Audit Cycle in which the audit occurs.
- American Chemistry Council (ACC) logo
- Responsible Care logo
APPENDIX 2

Establishing Auditor Time for RCMS Audits

This Appendix has been developed to provide the process to determine the appropriate length of time needed to complete RCMS audits at facilities and headquarters. The justification for the determined audit duration will be recorded and available to ANAB and ACC.

For purposes of determining audit duration, the following definitions shall be used:

- **Audit Day** – The duration of an audit day is normally eight (8) hours and may or may not include a lunch break depending upon local legislation.

- **Audit Time** – Time needed to plan and accomplish a complete and effective audit of the client organization’s management system. This includes the total time on-site at a client’s location and time spent off-site carrying out planning, document review, interacting with client personnel and report writing. (See Table 1 below)

- **Complexity Category** – For RCMS, the provisions specified in this document are based on five primary complexity categories of the nature, number and gravity of the EHSS hazards and risks of an organization that fundamentally affect the audit time.

- **Duration of management systems certification/conformity audit** – The duration of the management systems certification auditing activities (audit activities from the opening meeting to the closing meeting, inclusive) should typically not be less than 80% of the audit time. Travel and any breaks are not included in the on-site duration of management systems audits.

- **Effective Number of Personnel** – The effective number of personnel consists of all personnel involved within the scope of the certification including those working on each shift. When included with the scope of certification, it shall also include non-permanent (e.g., contractors) and part-time personnel.
  
  o Considerations for determining the effective number of personnel and employees potentially in scope shall take into account, those working on shifts, administrative and all categories of office staff and repetitive processes.
  
  o When calculating the effective number of personnel part-time personnel and personnel potentially in scope may be reduced or increased and converted to an equivalent number of full-time personnel dependent on hours worked.
  
  o When a high percentage of personnel perform certain activities/positions that are considered repetitive, a reduction to the number of personnel which is consistently applied for all clients is permitted.
The starting point for determining audit time of the RCMS shall be identified based on the risk/complexity of the organization and the effective number of personnel at the client location, then adjusted for the significant factors applying to the client to be audited, and attributing to each factor an additive or subtractive weighting to modify the base figure. In each situation, the basis for the establishment of audit time of the management system including adjustments made shall be recorded. The ASP shall ensure any variation in audit time does not lead to a compromise on the effectiveness of audits. The justification to determine the effective number of personnel and the audit duration determination shall be available to the client organization and for review by ANAB during its assessments.

Where it is necessary to address shift work situations, the extent of auditing each shift by the ASP depends on the processes done on each shift and the level of control for each shift that is demonstrated by the client. To audit effective implementation, at least one of the shifts shall be audited. The justification for not auditing the other shifts (e.g., those outside regular office hours) shall be documented.

The increase or reduction of audit time of management systems shall not exceed 30% of the times established in Table 1 below. Factors for adjustments of audit time that need to be considered include:

- **Increases in audit time:**
  - Complicated logistics, including movement between one or more locations
  - Staff speaking more than one language (requiring translators or preventing individual auditors from working independently);
  - System covers highly complex or high number of unique processes, products or services;
  - Higher sensitivity to local environment, local communities;
  - Views of stakeholders/interested parties;
  - Additional or unusual EHSS hazards or regulated conditions;
  - Risks of EHSS incidents and impacts arising, or likely to arise, and a result of previous EHSS problems that the client has contributed to.

- **Decreases in audit time:**
  - Very small site for number of personnel (e.g., office complex only)
  - Maturity of the RCMS
  - Prior knowledge of the client RCMS (e.g., already certified by the ASP for RCMS or other standard);
  - Client preparedness for certification
  - High level of automation
  - Where personnel include a number of people who work “off location” (e.g., salespersons, drivers, service personnel, etc.) and audit time may be adjusted accordingly.
  - Activities considered to be low risk (see Table 1)
  - Processes involving similar and repetitive activities
  - Identical activities of low complexity performed on all shifts with appropriate evidence of equivalent performance on all shifts
  - Where a significant proportion of staff carry out a similar simple function.
Procedure RC502.1

American Chemistry Council
Responsible Care® Third-Party Audit Requirement Requirements for RCMS Audit Service Providers

Note: Subtractive factors may be used once only for each calculation for each client location.

Table 1

<table>
<thead>
<tr>
<th>Effective Number of Personnel</th>
<th>RCMS Audit Time Per Location</th>
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<tbody>
<tr>
<td></td>
<td>Based on relationship between Effective Number of Personnel, Complexity and Audit Time</td>
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<td>(Initial Audit only – Stage 1 + Stage 2)</td>
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<table>
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<tr>
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<th>High (Days)</th>
<th>Medium (Days)</th>
<th>Low (Days)</th>
<th>Limited (Days)</th>
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</tr>
</tbody>
</table>

Follow Progression above to a maximum of:

|                  | 29 | 25 | 21 | 14 |

Note 1 – If a company opts to conduct a Stage 2 audit only, the ASP shall adjust the Audit Time accordingly and maintain a record of its methodology and decision. It is unlikely that Stage 2 only audit’s Audit Time will be reduced by more than 25%.

Note 2 – Time spent on Stage 2 normally exceeds time spent on Stage 1.

Note 3 – It is unlikely that the duration of a Stage 2 audit will be less than one (1) day.

Note 4 - When developing the RC502 document and this table, it was not the intent of ACC to cause audit days to increase significantly over previous Audit Cycles.

If a client elects to conduct surveillance audits to support its RCMS certification status (Option 1), audit time for a given client location should be proportional to the audit time on the initial certification audit.
(Stage 1 + 2), with the total amount of time spent annually on surveillance being about 1/3 of the audit time spent on the initial certification audit. The ASP shall obtain a client update related to its RCMS as part of each surveillance audit. Planned audit time shall be reviewed at least at every surveillance and recertification audit to take into account changes in the organization, system maturity, etc. Any necessary adjustments to audit time shall be recorded.

Note – It is unlikely that the duration of a surveillance audit will be less than one (1) day

Complexity Definitions

The following complexity definitions are provided as they apply to the client being audited. ASPs shall establish a process to determine complexity which takes into account variations in hazards and risks across multiple disciplines (environment, occupational safety and health, security) that may be present at a single location. It is not necessary that a “high” ranking in one discipline should cause a client location to necessarily be rated at that level if other disciplines indicate lower risk ratings. The ASP shall use its process consistently and document its decisions regarding complexity determinations.

**High Complexity** – These facilities have a large number of environmental, health, safety and security hazards and a large number of significant risks associated with those hazards. These facilities are typically large manufacturing facilities handling a significant quantity of high hazard materials.

**Medium Complexity** – These facilities have an average number of environmental, health, safety and security hazards and a modest number of significant risks associated with those hazards. These facilities are typically small to medium size manufacturing facilities handling a limited quantity of high hazard materials. Medium complexity may also include a company’s headquarters depending on the number of employees within the headquarters audit scope or the amount of support provided for the Responsible Care management system in support of site operations.

**Low Complexity** – These facilities have a small number of environmental, health, safety, and security hazards and few significant risks associated with those hazards. These facilities are typically small manufacturing operations with few employees and few or no high hazard materials. Low complexity may also include a company’s headquarters depending on the level of complexity of the functions provided to support the Responsible Care management system.

**Limited Complexity** – These facilities have a very limited number of environmental, health, safety and security hazards and few or no significant risks associated with those hazards. They may include headquarters or other office type environments which provide limited support functions for the Responsible Care management system.

**Special Complexity** – These facilities require additional and unique consideration at the audit planning stage. An example would include a headquarters audit where functions to support the Responsible Care management system are managed via a decentralized organization rather than a physical location.
Appendix 3 - Contact information

**ACC Contact information**

For information regarding the ACC’s Responsible Care Third-Party Audit Requirement, please contact:

Daniel Rocznia
Senior Director, Responsible Care and Value Chain Outreach
700 Second Street NE
Washington, DC 20002
202-249-6191
Dan_roczniak@americanchemistry.com

Inquiries may also be sent to ACC at:

Responsible_Care@americanchemistry.com

**ANAB Contact Information**

Tina Garner
Accreditation Manager, Management Systems
600 N. Plankinton, Suite 300
Milwaukee, WI 53203
414-501-5481
tgarner@anab.org
This document along with new RC501 and RC503 replace previous RC201 and RC204 documents.