

NOVA Chemicals Completes RCMS® HQ Audit

By Nigel Clark

In December 2004, NOVA Chemicals, US Operating Center (USOC) in Pittsburgh received Responsible Care Management System® (RCMS®) Certification from ABS Quality Evaluations. While adoption of RCMS is an ACC membership requirement, NOVA Chemicals approached it as an excellent opportunity to improve the effectiveness of our current Responsible Care® program and made the commitment to be among the first North American companies audited for the HQ component.

Development/Implementation Team

One of the first actions taken in the RCMS implementation phase was the creation of a formal development/implementation team. Members were selected from across the company, and one of the key criteria was management system expertise. This was to help create a rigorous and holistic approach to both our current systems review and subsequent program development. Key activities addressed by the company in preparing for the audit included:

- Review of all Responsible Care systems and completion of documentation updates as necessary;
- Formalization and documentation of several processes and programs that were in place or common practice, but not clearly defined; and,
- Creation or revision of all necessary documentation.

General Learnings

During the implementation phase, NOVA obtained some key learnings including:

- Cross-company involvement is important. Get other corporate functions involved early in the process.
- Making the most of existing systems to manage company compliance to RCMS (i.e. modifying and using Responsible Care requirements and the process for ensuring compliance with those requirements vs. creating a new process) was a very effective platform.

Audit Learnings

In addition to lessons learned in its implementation phase, the actual certification audit provided the company with a number of learnings that are likely applicable to other ACC members and Partners, including:

- Separating Stage 1 and Stage 2 Audits by a couple of months is a good practice to enable fine-tuning.
- Completing an internal gap analysis allowed NOVA to show we were "checking" how the system was functioning.
- Conducting the internal review earlier in our process would have been helpful to provide the right level of focus on what needed to be completed.
- Communications efforts around RCMS and the audit

itself is a significant task; do not underestimate. (This is crucial to the organization's acceptance of the project.)

- Having RCMS program coordinators participate in interviews (subject to auditor's approval) with interviewees and auditor was beneficial because it:
 - was educational for individuals in areas of Responsible Care that were not necessarily in their functional scope;
 - helped ensure staff thoroughly understood potential findings; and,
 - helped the auditor get the right information from the right people sooner.
- Auditors are still learning about the best methods for assessing RCMS. There's not a right or wrong way to implement RCMS, so be prepared to outline your company's approach to handling the RCMS requirements and communicate it clearly to auditor at the start of the audit. This will help the audit go more smoothly.
- Pre-book audit interviewees. As in most organizations, scheduling ad-hoc meetings isn't feasible. This is a bit of work but ensures a smooth audit involving the right people.
- The auditor can't know your organization, so identify roles/names in the organization for the auditor based on the subject matter they are interested in and set up interviews accordingly.
- Have other potential interviewees aware or available, even if not initially on the interview schedule.

Benefits

Implementing RCMS brought a higher level of clarity, focus and completeness to our corporate processes. We feel that this will directly and positively impact how we manage the Responsible Care requirements at our sites and facilities.

Our hope is that our involvement in the RCMS certification audit will ultimately result in reduced exposures, illnesses and injuries to employees and contractors; better environmental performance for our communities; and improved security at our plants and across the value chain. This continuous improvement should also result in lower operating costs and improved relationships with our key stakeholders.

We are already seeing some benefits of formalizing some of the processes we had previously managed more informally, in terms of better organization, thoroughness and providing the right focus on areas to highlight for improvements. We believe that RCMS is a strong approach for Responsible Care companies. **C B**

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