

American Chemistry Council – Chemistry Industry Association of Canada  
Responsible Care® Certification/Verification Model

Proposed Report Template of  
“other Responsible Care® Commitments”

Submitted by Gigi Bear / ABS-QE to CIAC

As part of the 2020 RCMS®/RC14001® audit of  
**BASF Canada Inc. – Toronto Site**

<b>Audit team’s conclusions about the effectiveness of the management system:</b>	
X	Based on the results of the audit, the audit team determined that the management system was effectively implemented and maintained per defined requirements and is deemed capable to achieve expected outputs.
<input type="checkbox"/>	Based on the results of the audit, the audit team determined that the management system was effectively implemented and maintained per defined requirements and is deemed capable to achieve expected outputs, except as noted in the nonconformities.
<input type="checkbox"/>	Based on the results of the audit, the audit team determined that the management system was not effectively implemented and maintained per defined requirements nor deemed capable to achieve expected outputs. The audit team recommendation is for “Certification Review”.

<b>Audit team’s conclusions about the effectiveness of the CIAC Other Responsible Care® Requirements and commitment to Responsible Care® Ethic and Principles:</b>	
X	Based on the results of the audit, the audit team determined that the CIAC Other Responsible Care Requirements and commitment to Responsible Care Ethic and Principles were effectively implemented and maintained per defined requirements and is deemed capable to achieve expected outputs.
<input type="checkbox"/>	Based on the results of the audit, the audit team determined that the CIAC Other Responsible Care Requirements and commitment to Responsible Care Ethic and Principles were effectively implemented and maintained per defined requirements and is deemed capable to achieve expected outputs, except as noted in the nonconformities.
<input type="checkbox"/>	Based on the results of the audit, the audit team determined that the CIAC Other Responsible Care Requirements and commitment to Responsible Care Ethic and Principles were not effectively implemented and maintained per defined requirements nor deemed capable to achieve expected outputs. The audit team recommendation is for “Certification Review”.

A- Description of Company, Audited Facilities, Process and Scope of Audit	
<ul style="list-style-type: none"> <li>▪ Facility is located in the west end of Toronto in an industrial area near Lester B. Pearson International Airport and a number of major highways, including the 401, 409, and 427.</li> <li>▪ Areas (sq. ft.)               <ul style="list-style-type: none"> <li>○ Site - 303,700</li> <li>○ Building footprint - 140,000 including:                   <ul style="list-style-type: none"> <li>○ Production 18,000</li> <li>○ Warehouse 74,000</li> <li>○ Labs 7,950</li> <li>○ NLR Training Center 6,000</li> </ul> </li> </ul> </li> </ul>	

- Occupied offices 8,200
- Unoccupied offices 18,000
- The property is BASF owned.
- Number of Employees: BASF - 40, Automotive Refinish Technologies (ART) -12, Chemetall - 7
- BASF Operating Divisions: PM, EC, MBS (formerly EB), EM
- Site activities include: PMU production and distribution, PM development labs, MBS distribution, Refinish training center, PM spray training center, ART distribution, Chemetall distribution, IT service center

Assets Overview

Tank #	Capacity (Metric Tonnes)	Current Use
TK 601A	5	Flexible resins
TK 601B	5	Rigid resins
TK 602A	10	Spray
TK 602B	10	Spray
TK 620	20	Bulk rigid resins

- All 5 tanks are cyclopentane capable.
- Automated formic acid dosing all tanks except TK601B.
- Intermediate tanks.
  - ▶ TK 401, 1 tonne tank used for water stripping.
  - ▶ TK 402, 4 tonne open top tank used for adding black pigment to flexible resins.

B- Summary of the evidence relating to:

- the capability of the management system to meet applicable requirements and expected outcomes.
- the internal audit and management review process.

The facility has an integrated ACC and CIAC RCMS management system program in alignment with the corporate and regional requirements. Programs and continual improvement initiatives are on-going and multiple relevant goals have been implemented focusing on continuous improvements, businesses sustainability, and operation processes effectiveness. The internal audit program is established and is supported by qualified internal and external resources. The management review processes are established with the appropriate participation of affected organization functions. Corrective actions processes are established.

Continuous improvement processes are effectively identified through standardized multiple risk assessments and goals setting processes.

C- Summary of the evidence relating to:

- the capability of the Other Responsible Care Requirements and commitment to Responsible Care Ethics and Principles to meet applicable requirements and expected outcomes
  - The corporate Responsible Care® Policy Statement applies to entire organization
  - Facility programs and supporting processes follow the business and corporate EHSS & RCMS policies and programs and are fully integrated with the Canadian CIAC Program
  - MSs programs documents & records are located in multiple electronic systems and are readily accessible through the share point
  - The organization structure is documented and identifies role and responsibilities and the Responsible Care® / CIAC support functions including regional and corporate assigned staff
  - RCMS Matrix “road map” is documented mapping the RC requirement to site and corporate specific program procedures and references
  - The programs are integrated, and policies and standards appropriate to the scope of the business and operation exist and appeared to be well communicated throughout the organization
  - Management is fully engaged in setting the expectation and providing qualified resources for the RCMS program implementation
  - Management team and the majority of staff have long term experience with BASF and facility and are highly focused on operation excellence, risk reduction and continual improvements strategies
- Observations on public engagement and communication of the Worst Case Scenario
  - Worst Scenario event is identified and communicated to the Canadian authority and community per CIAC requirement – reference: CIAC Worst case Scenario Communications – 2018, 2019
  - Community outreach programs are established with leadership and employees’ involvement and are maintained as part of the CIAC program and included CAER, community and Indigenous Code projects activities – reference: CIAC Transparency & Outreach Scope
- Summary and observations of off-site meeting with Community Representatives
  - Discussion with the community representative (Ms. Kathy Martorino - Chair of the Toronto West Care Committee) verified high level of site community engagement and outstanding contribution to the various sponsored community activities as part of the BASF organization and the Toronto West Care Committee.
- Successful (excellent/Best) Practices to be shared
  - Integration of RC & CIAC programs
  - Incident Management Training for site leaders
  - Capital project for the replacement of the cyclopentane 2000 gallons totes with a bulk tank to reduce potential personnel and environmental exposures

<ul style="list-style-type: none"><li>○ Achieved 2 years record with no recordable incident</li><li>● Opportunities for Improvement identified<ul style="list-style-type: none"><li>○ None identified</li></ul></li></ul>
<p>D- Note that beginning in 2020, new <u>Indigenous Code Elements</u> apply for those facilities located near indigenous communities or where these companies may be significantly impacted by their operations.</p> <ul style="list-style-type: none"><li>○ Program is fully established in spite of the fact that the facility is not near indigenous communities</li></ul>
<p>Auditor conclusion Statement: The facility integrated ACC and CIAC RCMS management system program is well established, effectively implemented and maintained, and capable to address the relevant environmental, health, safety and security concerns at the Toronto facility</p>
<p>Auditor(s): Gigi Bear</p> <p>Date: 12/16/2020</p>