

**Chemistry Industry Association of Canada
Responsible Care® Certification**

Report of other compliance obligations, CIAC Responsible Care® Commitments

Submitted by: ERCO to CIAC
Auditor/firm: Maureen Pococke BSI

As part of the RCMS:2023 audit of:
ERCO Sites:
PO Box 2410
Hargrave, Manitoba
Wanuskeni Road North and 71 St
Saskatoon, SK
and
5050 Satellite Dr
Mississauga, ON

Audit team's conclusions about the effectiveness of the management system:

☐	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 of achieving expected outputs.
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, except as noted in the nonconformities.
☐	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.

Audit team's conclusions about the effectiveness of the CIAC Other Responsible Care® Requirements and commitment to Responsible Care® Ethic and Principles:

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.
☐	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 of achieving expected outputs, except as noted in the nonconformities.
☐	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 of achieving expected outputs.

Description of Company, Audited Facilities, Process and Scope of Audit

1. ERCO Hargrave, MB and Saskatoon, SK are wholly owned subsidiaries of ERCO Corporation, headquartered in Mississauga, ON Canada. Globally, ERCO, based in Mississauga, ON is a chemicals company with sales of \$823.9MM in 2024. The company currently has about 500 employees in 3 countries and is represented at 8 production sites in Canada and the US and 1 in Chile. The Canadian company headquarters and research pilot plant are in the greater Toronto, ON area. There are approximately 359 employees in Canada. This Saskatoon site manufactures sodium hydroxide, hydrochloric acid and chlorine and the Hargrave site manufactures sodium chlorate. For additional information please consult the ERCO Corporation corporate website: <https://www.ercoworldwide.com>. ERCO Hargrave, MB; ERCO Saskatoon, SK and ERCO HQ Mississauga, ON are currently seeking certification under the ACC's RMCS:2023 Technical Specification. The verification was completed as part of the RCMS:2023 audit conducted at the ERCO Hargrave, MB site Sept 15 to 19, 2025; ERCO Saskatoon, SK site from Oct 20 to Oct 24, 2025, and the verification was completed as part of the RCMS:2023 audit conducted at the ERCO HQ Mississauga, ON from Nov 17 to Nov 19, 2025.

2. Summary of Non-Conformances

- RCMS 4.2 Evaluation of Compliance (Hargrave)
While reviewing the 2024 Internal Compliance Safety Audit, Security was not included in the audit
- RCMS 4.2 Evaluation of Compliance (Hargrave)
While reviewing evaluation of compliance, it was not evident how the site maintains knowledge of its compliance/conformance status.
- RCMS 3.4 Competence and Training (Hargrave)
All requirements on the Utility Operator checklist were not marked as verified on the skill checklist for a new employee at the site.
- RCMS 4.2 Evaluation of Compliance (Saskatoon)
While reviewing the most recent evaluation of compliance, it was noted that a finding (1415 from the Safety Compliance audit) was incorrectly categorized, and very delayed in being addressed.
- RCMS 3.1.3 Responsible Care Documentation (Saskatoon)
While reviewing employee training records for a trainee, it was noted that some supervisor signoffs were missing from the training records.
- RCMS 3.2a Competence and Training (Saskatoon)
While sampling updates for process documents during the annual training session, it was noted that there is missing evidence that the updated documents are reviewed by the individuals that conduct these activities.
- RCMS 4.6.2e Corrective Action (Saskatoon)
While reviewing a corrective action for the site from the internal audit, it was noted that effectiveness of the action had not been reviewed.
- RCMS 2.1 Identification of hazards and risks (Mississauga)
Need to consider abnormal and emergency risks when assessing risks for prioritization
- RCMS 3.2 Operational control (Mississauga)

A MOC was entered in Jan 2025 but there is no evidence it has been managed since that time

- RCMS 4.3.2b Internal Audits (Mississauga)
Auditing the internal audit process was conducted by the individual who did the audit, so this did not meet the requirement for impartiality.
- RCMS 4.6.2a Corrective actions- Identify root causes (Mississauga)
Reviewed Major Hazard Risk Assessment Corrective Action entered 10-18-2024 that has actions, but a root cause is not evident in the documentation as required.

3. Summary of opportunities for improvements

- Sustainability Steering team is looking at doing a survey with employees related to continual improvement opportunities. (Mississauga)

4. Summary of the evidence relating to CIAC other compliance obligations:

a) **The capability of the Other Responsible Care Requirements and commitment to Responsible Care Ethics and Principles to meet applicable requirements and expected outcomes.**

- A clear and present commitment to organizational and operational sustainability is well evidenced in ERCO management's oversight through monthly metric meetings with upper management.
- With respect to the requisite CIAC Responsible Care® code practices, ERCO has been an active member of CIAC since 1985 and continues to contribute to promotion of Responsible Care® Ethics and Principles
- Recommitment letter submitted 1/27/2025 by the President and CEO of ERCO on behalf of the ERCO Worldwide LP. Responsible Care Commitments included in management review 1/26/2024.

b) **Participation in TRANSCAER activities by the company where it has operations**

Hargrave

Organization (and municipal fire department) is part of the CAER-Group. Coordinated community engagement and information on emergency response preparedness. Community siren test conducted 2023-Jun-17.

TRANSCAER meetings -

Prairie Region TRANSCAER meeting 5-22-2025; discussing for drills and exercises.

There is 1 meeting a year and they have a practice for a possible issue with transportation issue, worst case scenario communication tanker hose rupture, a tank rupture, tanker hose rupture in trench and pad and map of neighbors with names, and phone numbers.

Leadership as well as operators have been well trained and encouraged in these topics.

Saskatoon

Organization (and municipal fire department) is part of the CAER-Group. Coordinated community engagement and information on emergency response preparedness. Community siren test conducted 2023-Jun-17.

TRANSCAER meetings -

Prairie Region, TEAP 3 auditor for emergency response contractors, Editorial board member, National TRANSCAER educator, outreach events geared to the transportation topics related to chlorine

Prairie Region virtual meeting in May 22, 2025 discussed training and support to responders in the region, update to the safety training car, new PRTC members, update on the national committee, and a roundtable.

interviewee has been a member for 7-8 years.

Leadership as well as operators have been well trained and encouraged in these topics.

At the Mississauga facility, there are members that belong to the national region for CAER. Sampled National TRANSCAER committee minutes from 10-2-2025; and meeting minutes for the Ontario region 6-24-2025 and they attended the community event on TRANSCAER in Cambridge, ON date 5-13-2025.

The development and communication of a worst-case scenario

Hargrave

Considerations for communicating to neighbors is documented, Community recovery is documented for Recovery and Public relations, the site has developed a brochure for the neighbors within a radius of the plant that could be affected by a release. The brochure is brought to the neighbors annually and reviews the actions they need to take. There will be a debriefing with the community if there is a release, the site maintains a mutual aid agreement with the local emergency services, TERP manual describes responding to offsite incidents and it is managed by corporate. Crisis Management for long term incident events was developed at corporate and is currently being updated.

Saskatoon

Point of Release Potential Health Effects from HCl release and chlorine release pamphlet went to the Community Advisory Panel and EMO in Saskatoon Date 2022. There is a map that showed the possible area of impact.

Door to door communication with people in the buffer zone March 8, 2022, the brochure given to the public had contact information if there was ever an emergency. It also had a Responsible Care logo on the pamphlet.

There is list of all the contacts that were made. Crisis Management for long term incident events was developed at ERCO corporate headquarters and is currently being updated.

c) **Participation by long-term leadership in CIAC Responsible Care activities, committees and submission of annual recommitment letter.**

Recommitment letter submitted 1/27/2025 by the President and CEO of ERCO on

behalf of the ERCO Worldwide LP.

Top management is involved in a monthly activity to review environmental, health, safety and security metrics and progress on objectives.

d) **Evidence the company has provided CIAC with benchmarking data and other required submissions.**

NERM Survey for CIAC issued for reporting year 2024 for emissions, waste and water, production, recycling, hazardous waste, non-hazardous waste, and water use.

e) **Evidence the company has reviewed its activities against CIAC's Responsible Care Principles and Ethic, and its position on sustainability and corporate responsibility.**

Management Review included reviews for their activities and monthly activity to review environmental, health, safety and security metrics and progress on objectives with top management.

f) **Evidence of stakeholder/community dialogue including interviews by auditors with local community representatives.**

Hargrave

Interview with community rep (he has been the rep for 10 years), he is the closest neighbor and rents land from ERCO for farming.

Great relationship with the plant manager. There are 2 or 3 contacts a year with the neighbors. Communications for mock drills have improved. Upfront on communications from the start and take care of the community center. He has taken a tour of the plant several times. Christmas gifts are brought to their homes every year.

Saskatoon

Interviewed a member of the North End Saskatoon Community Advisory Panel. A sampling of the membership of this group includes representatives from the city, BASF, ERCO, Meewassin Valley Authority, Lawson Heights Community Assoc, Nouryon Chemical, Russell Metals, and Crestline Coach. Jim Brayshaw is the leader of the group. Plant highlights are presented on safety, environmental, community outreach, and general business. Each meeting there is a specific RC topic that is explained and how each RC company meets the specific code element. Meetings are quarterly.

Tours are offered by the various companies. Reviewed minutes from the CAP Q1 topic was Emergency Response and CAP Q2 topic was Safety and Site Security. Reviewed the information provided by ERCO for Sept meeting to the CAP including safety stats, environmental release, donations for various organizations including Evan Hardy Graduating class of 2025, sponsored advertisement and campaign for Health teens Magazine Edition 3, and sponsored a tree planting project with Meewassin Valley Authority. Business notes on the plant were included.

Outreach activities by the Toronto site: Food drive (490 lbs of food to food bank) 8-2-2024; scholarship for a STEM First Nation Female 9-30-2024, scholarship for 1 STEM student 4 year \$5K per year, scholarship for STEM student for \$2K /year

g) **Evidence that the company promotes Responsible care by name with internal and external stakeholders and they are aware of the term.**

RC promotion was evident from postings and other forms of communication.

There is visible branding for RC in their literature for neighbors and postings around the site.

Employee interviews showed they had a good understanding of RC and how they support the company, community and RC programs.

h) **Engagement with indigenous communities or groups near production facilities with respect for their unique history, culture and rights.**

Hargrave

Ethics sustainability review 2024 ERCC (included indigenous land recognition) June 17 and 18, 2025 2-day meeting includes President, VP, and Sr Manager HSE at the site.

Indigenous communities are approximately 40 to 60 minutes away. The site sponsors 2 scholarships for students entering the trades or power engineering and if all things being equal the scholarship would be given to an indigenous student.

Saskatoon

Ethics sustainability review 2024 ERCC (included indigenous land recognition) June 3 and 4, 2025 2-day meeting includes President, VP, and Sr Manager HSE at the site.

Regular invitations to CAP meetings,

Employment opportunities are all based on equality

Scholarships at SaskPolytech for study applicable to chemical manufacturing curriculum for indigenous female that demonstrate financial need

Mississauga

Indigenous community recognition for ERCC meeting

Scholarship for a STEM First Nation Female 9-30-2024

5. **Organizational Strengths, Successful (excellent/best) practices to be shared:**

- Monthly metrics which are reviewed with top management
- SWOT analysis and actions to address key activities
- Risk prioritization
- Teamwork Spirit and Culture amongst all employees, daily debrief and planning at the beginning of the shift (Hargrave)

Individuals interviewed external to the organization:

- Kelly Greenwood EHS Specialist from BASF, member of the CAP
- Ken Heaman Community Rep

Auditor(s): Maureen Pococke _____

Date: __1-26-2026_____

Letter of Conformance

RESPONSIBLE® CARE MANAGEMENT SYSTEM

This is to certify that:

ERCO Worldwide LP - HQ Corporate
5050 Satellite Drive 6th Floor
Mississauga
Ontario
L4W 0G1
Canada

Letter of Conformity Reference Number: **RCMS 821189 (ERCO W-0047857942-001)**

and operates a Responsible Care Management System, which complies with the requirements RCMS®
Technical Specification:2023:

The Responsible Care Management System associated with oversight for the various site activities associated with providing support services for the manufacturing of chemical products and chlorine dioxide generation equipment.

For and on behalf of BSI:



Jessica Patel, Senior Vice President, Assurance Americas

Audit Date: 2025-11-19

Effective Date: 2026-01-27

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Letter of Conformance

RESPONSIBLE® CARE MANAGEMENT SYSTEM

This is to certify that:

**Erco - Hargrave
Hargrave Plant, P.O Box 2410
Hargrave
Manitoba
R0M 2C0
Canada**

Letter of Conformity Reference Number: **RCMS 821189 (ERCO W-0047857942-002)**

and operates a Responsible Care Management System, which complies with the requirements RCMS®
Technical Specification:2023:

The Responsible Care Management System associated with the manufacturing and distribution of sodium chlorate.

For and on behalf of BSI:



Jessica Patel, Senior Vice President, Assurance Americas

Audit Date: 2025-09-18

Effective Date: 2026-01-27

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Letter of Conformance

RESPONSIBLE® CARE MANAGEMENT SYSTEM

This is to certify that:

Erco - Saskatoon
Wanuskeni Road North & 71 St
P.O. Box 1586
Saskatoon
Saskatchewan
S7K1V2
Canada

Letter of Conformity Reference Number: **RCMS 821189 (ERCO W-0047857942-005)**

and operates a Responsible Care Management System, which complies with the requirements RCMS® Technical Specification:2023:

The Responsible Care Management System associated with the manufacturing and distribution of chlor-alkali (sodium hydroxide, chlorine, hydrochloric acid).

For and on behalf of BSI:



Jessica Patel, Senior Vice President, Assurance Americas

Audit Date: 2025-10-24

Effective Date: 2026-01-27

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