Responsible Business Alliance
Advancing Sustainability Globally

OVERVIEW OF SPECIALTY VALIDATED ASSESSMENT PROGRAM (SVAP) ON CHEMICAL MANAGEMENT

INTRODUCTION

Companies operating in international supply chains face increasing regulatory requirements and stakeholder expectations for advanced due diligence in chemical management. The global demand for process chemicals and chemical-intensive products has had rapid growth across many sectors over the past decade, which is expected to continue well into the future. Evaluating companies' chemical management practices and efforts to cease, prevent or mitigate the associated adverse impacts on human health and the environment requires specialized knowledge, standards, and resources.

The RBA has worked with subject matter experts from stakeholders, audit firms, and member companies to develop a world-class evaluation program for chemical management due diligence called the Specialty Validated Assessment Program (SVAP) on Chemical Management. Whether your company is looking to evolve its existing chemical management program or is just getting started, the SVAP on Chemical Management can accelerate your due diligence efforts on the sound management of chemicals. The SVAP on Chemical Management standards and provisions support companies' continual improvement toward the elimination or mitigation of adverse occupational, environmental, and social impacts in global supply chains.

WHAT IS THE SVAP ON CHEMICAL MANAGEMENT?

The Specialty Validated Assessment Program (SVAP) on Chemical Management is an assessment process used to evaluate the risks of hazardous occupational exposures and chemical emergencies. The RBA developed the SVAP on Chemical Management protocol and facilitates assessments performed by approved, independent third-party auditors that have unique expertise in industrial hygiene and occupational safety. The elements of the SVAP on Chemical Management were carefully developed by the RBA with input from stakeholders, members, and third-party subject matter experts to create a specialized assessment program. It is limited in scope to focus exclusively on provisions of the RBA's Validated Assessment Program (VAP) that are related to chemical management. This unique assessment program is ideal for facilities that house chemical-intensive operations and have relatively high chemical management risks.

OVERVIEW OF CONFORMANCE REQUIREMENTS OF SVAP ON CHEMICAL MANAGEMENT

The SVAP on Chemical Management is a specialized assessment process that evaluates chemical management risks of a facility's operational activities. It was developed based on RBA's Validated Assessment Program (VAP) and doesn't expand on standards embodied in the RBA Code of Conduct. However, in addition to the chemical management related provisions of the VAP, the SVAP on Chemical Management contains complementary provisions that more acutely assess occupational safety, emergency preparedness, hazard communication, and the management of hazardous substances. As such, it was designed to better evaluate chemical management risks through a deeper assessment on this responsible business conduct issue.

This overview resource identifies SVAP on Chemical Management provisions with example criteria for each, which are intentionally not exhaustive. Only Validated Assessments (VAs) are available for the SVAP on Chemical Management, not Auditee Managed Assessments (AMAs) or Customer Managed Assessments (CMAs). As required by all RBA VAs, at least three data points of evidence are required to verify conformance or non-conformance.

The SVAP on Chemical Management was developed based on the RBA Code of Conduct and draws from many internationally recognized standards, recommendations, guidelines, and frameworks. To help users understand material topic coverage, two appendices are provided to illustrate linkage with related international standards and recommendations. Appendix 1 provides mapping of the SVAP on Chemical Management to the International Labour Organization's (ILO's) recommended components for workplace chemical management programs, and Appendix 2 provides mapping to the International Organization for Standardization's (ISO's) ISO 45001 standard.

B. Health & Safety

B) Occupational Safety
B1.2 Health & Safety Hazards are Identified, Assessed and Mitigated using Hierarchy of Controls
• Health and safety hazards are identified, assessed, and mitigated according to hierarchy of controls • If higher hierarchy level control measures don't sufficiently mitigate hazards, appropriate personal protective equipment (PPE) must be made available and properly worn
B1.2.1 Hazardous Chemical Assessment and Consideration of Hierarchy of Controls
• Chemical hazard assessment methods are used to evaluate and review of chemicals used in operational activities • Chemical hazards are identified, and risk management procedures are in place
B1.2.2 Job Hazard Analysis
• Job hazard analysis (JHA) process for routine and non-routine tasks and activities by workers and contractors, which identifies and controls hazards prior to work implementation • Work is not authorized until risk assessments are completed and control measures are implemented
B1.2.3 Chemical Handling
• Facility-specific chemical handling, inspection, and housekeeping practices for areas where chemicals are stored, handled or otherwise managed • Chemical storage, handling, management or use areas are designed and maintained to ensure that storage areas are well organized, chemicals are not stored outside of designated areas, and incompatible chemicals are segregated
B1.3 Reproductive Health for Pregnant Women & Nursing Mothers
• Reasonable steps are in place to remove pregnant women and nursing mothers from high hazard working conditions • Workplace health and safety risks to pregnant women and nursing mothers are mitigated

B2) Emergency Preparedness
B2.2 Emergency Preparedness & Response Program
• Emergency preparedness and response programs, plans and processes are established • Combustible storage is minimized and limited to areas with adequate fire detection and protection
B2.2.1 Hazardous Chemical Emergency Management
• Facility's chemical storage, handling and management practices agree with emergency preparedness and response plans • Spill kits appropriately stocked and maintained in areas where chemicals are stored, handled or used
B2.2.2 Emergency Equipment
• Emergency equipment that is maintained in working condition is readily available in areas where larger volumes of chemicals are stored, handled or used • Medical supplies and equipment to support chemical emergency response incidents

B3) Occupational Injury & Illness
B3.1 Work-related Accidents, Near-misses & Illnesses
• Work-related incidents are reported, investigated, addressed and tracked • Incident investigations entailing root cause analyses are completed by competent personnel
B3.1.1 Medical Surveillance
• Facility-specific program is implemented and maintained to provide workers that have occupational chemical exposure risks with occupational medical examinations

B4) Industrial Hygiene
B4.1 Occupational Exposures are Identified, Evaluated & Controlled using Hierarchy of Controls
• Workers' occupational exposures are identified, evaluated, and controlled in accordance with hierarchy of controls • Engineering controls are implemented to reduce or eliminate hazardous occupational exposures to chemical products containing chemical ingredients on RBA's Industry Focus Process Chemicals (IFPC) List
B4.1.1 Hazardous Chemicals Exposure Qualitative Risk Assessment
• Chemical management activities are accounted for in chemical inventory documentation, qualitative exposure risk assessment process, and chemical handling activities by all similar exposure groups (SEGs)

B4.1.2 Exposure Control Plan
• Exposure control plan in place to reduce the potential for hazardous chemical exposures • Engineering controls in place and implemented according to facility's exposure control plan
B4.1.3 Hazardous Chemicals Exposure Quantitative Risk Assessment
• Quantitative exposure assessments that evaluate actual occupational exposures, which entail general workplace conditions and specific activities of various SEGs using formal industrial hygiene sampling and analysis methodologies • Formal reviews of quantitative exposure assessments to identify activities and areas of concern, including corrective actions to better control or eliminate exposures
B4.1.4 Ventilation & Extraction Devices
• Local area ventilation and/or exhaust systems are used to remove hazardous vapors, mists or dusts from work areas • Hoods kept closed at all times, except when adjustments within the hood are being made, and volume of materials stored in hoods is minimized and don't block vents or airflow
B4.1.5 Respiratory Protection Program
• Workers are made fully aware of inhalation hazards and provided appropriate respiratory protection • Appropriate respirators with appropriate cartridges are worn consistently by workers as required

BM. Health & Safety Management Systems

BM1) Risk Assessment
BM1.1 Health & Safety Compliance Process
• Health and safety compliance process to monitor, identify, understand, and ensure compliance with applicable laws and regulations and customer requirements
BM1.2 Health & Safety Management Process
• Adequate and effective management system to identify, assess and control occupational health and safety risks

BM2) Control Processes
BM2.1 Health & Safety Responsibilities & Authorities
• Health and safety responsibilities and authorities are defined and assigned for all management employees and workers for implementation of management systems, and for compliance with laws, regulations, and codes
BM2.2 Health & Safety Policies & Control Processes
• Health and safety policies and control processes are established
BM2.3 Health & Safety Training
• Health and safety training process is established for all managers/workers on all policy/process/job related aspects and performance targets

BM3) Communications
BM3.1 Health & Safety Communications
• Worker/manager health and safety communication program that solicits and encourages worker participation, input and feedback for improvement, and includes visitor, supplier and customer communications • Hazard communication signage is clearly posted or placed in areas identifiable and accessible by workers
BM3.1.1 Hazardous Chemicals Warning Signs & Instructional Placards
• Hazardous chemicals warning signs and instructional hazard signs are posted, providing awareness to employees, contractors and visitors of the hazardous chemicals in use and their associated hazards • Hazardous chemicals instructional materials are in languages spoken in the workplace or are easy to understand
BM3.1.2 Hazardous Chemical Awareness, Communication & Training
• Program for ensuring that workers are informed and trained about the hazardous chemicals they handle, necessary protective measures, and where hazard information may be found • Safety data sheets (SDSs) for each chemical used are readily accessible to workers during each work shift and available in a language workers can read and understand
BM3.2 Health & Safety Grievance Process
• Confidential health and safety grievance without fear of reprisal or intimidation is established • Grievance channels are clearly communicated and internal communication of the grievance mechanism must be in a language the workers can understand and visible

BM4) Performance Review & Continuous Improvement
BM4.1 Health & Safety Management Performance Review & Continuous Improvement
• Health and safety management performance review and continuous improvement process
BM4.2 Health & Safety Self-audit Process
• Health and safety self-audit process to periodically assess conformance with RBA Code and customer requirements
BM4.3 Health & Safety Corrective Action Process
• Health and safety corrective action process to rectify and close non-conformances

C. Environment

C2) Hazardous Substances
C2.1 Hazardous Waste Disposal
• Hazardous waste is responsibly disposed of using government-approved and/or licensed vendors
C2.1.1 Hazardous Chemical Inventory & Acquisition Process
• Detailed hazardous chemical acquisition process is in place • Identified materials are represented on the chemical inventor
C2.1.2 Chemical Handling Plan
• Chemical handling plans for hazardous chemicals, including identified safeguards
C2.1.3 Hazardous Chemical Storage
• Areas for the management and handling of hazardous chemicals are specifically designated, including areas where hazardous chemicals, including wastes, are stored, handled, managed or otherwise used • Chemical dispensing or mixing of flammable chemicals from containers 20 liters or more is performed in room equipped with automatic fire protection, explosion-proof electrical fixtures, portable fire extinguishers and warning signs at entry/exit points identifying the hazards
C2.1.4 Container Management
• Hazardous chemical containers are adequately and effectively maintained while in storage or use, and containers are in good condition, not leaking and kept closed when not in use • Stored hazardous chemicals are examined periodically for replacement, deterioration, and container integrity

Appendix 1: Mapping of RBA SVAP on Chemical Management to ILO Recommended Components for Workplace Chemical Management Programs

The ILO published *Exposure to hazardous chemicals at work and resulting health impacts: A global review* in 2021, which was prepared in the framework of ILO's Safety + Health for All Flagship Program. As noted in that publication, "effective and evidence-based systems for the sound management of chemicals must be implemented at both the national and workplace levels as a matter of urgency." The following table describes the material topic linkage between the RBA SVAP on Chemical Management and the ILO's recommended components for a workplace program for the sound management of chemicals.

			Mapped to the ILO recommended components for the Sound Management of Chemicals in the Workplace[1]											
RBA Code of Conduct	**SVAP-CM Audit Criteria**	**SVAP-CM Conformance Requirements**	General obligations, responsibilities, and duties	Classification and Labelling following the GHS	Chemical Safety Data Sheets	Operational Control Measures	Design and Installation	Work Systems and Practices	Personal Protection	Information and Training	Maintenance of Engineering Controls	Exposure Monitoring	Medical and Health Surveillance	Emergency Procedures and First Aid	Investigation and Reporting of Accidents, Occupational Diseases and Other Incidents
B1 – Occupational Safety	B1.1	OHS Hazards Identified, Assessed and Mitigated according to Hierarchy of Controls				✓	✓	✓	✓			✓			
	B1.2.1	Hazardous Chemicals Assessment and Risk Management				✓	✓	✓	✓			✓			
	B1.2.2	Job Hazard Analyses for Routine and Non-routine Activities				✓	✓	✓	✓	✓					
	B1.2.3	Chemical Handling and Housekeeping Practices				✓	✓	✓	✓		✓			✓	
	B1.3	Reproductive Health Management for Pregnant Women and Nursing Mothers				✓		✓							
B2 – Emergency Preparedness	B2.2	Emergency Preparedness and Response Programs	✓					✓						✓	✓
	B2.2.1	Hazardous Chemical Emergency Management	✓					✓						✓	✓
	B2.2.2	Emergency Equipment is Appropriate, Maintained and Readily Available	✓					✓			✓			✓	✓
B3 – Occupational Injury & Illness	B3.1	Work Related Incidents are Reported, Investigated and Addressed													✓

[1] International Labour Organization (ILO). *Exposure to hazardous chemicals at work and resulting health impacts: A global review*. ISBN: 978-9-22-034219-0. https://werkveilig.files.wordpress.com/2021/06/ilo-chemical-risks-worldwide-rapport-2021.pdf

			Mapped to the ILO recommended components for the Sound Management of Chemicals in the Workplace[1]											
RBA Code of Conduct	**SVAP-CM Audit Criteria**	**SVAP-CM Conformance Requirements**	General obligations, responsibilities, and duties	Classification and Labelling following the GHS	Chemical Safety Data Sheets	Operational Control Measures	Design and Installation	Work Systems and Practices	Personal Protection	Information and Training	Maintenance of Engineering Controls	Exposure Monitoring	Medical and Health Surveillance	Emergency Procedures and First Aid	Investigation and Reporting of Accidents, Occupational Diseases and Other Incidents
	B3.1.1	Medical Surveillance											✓		✓
B4 – Industrial Hygiene	B4.1	Occupational Exposures are Identified, Evaluated, and Controlled according to Hierarchy of Controls				✓	✓	✓	✓			✓	✓		
	B4.1.1	Hazardous Chemicals Exposure Qualitative Risk Assessment				✓	✓	✓	✓			✓			
	B4.1.2	Exposure Control Plan				✓	✓	✓	✓			✓			
	B4.1.3	Hazardous Chemicals Exposure Quantitative Risk Assessment				✓	✓	✓	✓			✓			
	B4.1.4	Ventilation and Extraction Devices				✓	✓				✓				
	B4.1.5	Hazardous Chemicals Respiratory Protection Program	✓						✓	✓		✓	✓		
BM1 – Risk Assessment	BM1.1	Process to Ensure Compliance with OSH Regulatory and Customer Requirements	✓												
	BM1.2	Process to Identify and Assess Health and Safety Risks	✓												
BM2 – Control Processes	BM2.1	OSH Responsibilities and Authorities for Implementation of Management Systems	✓											✓	
	BM2.2	OSH Policies and Control Processes				✓	✓	✓	✓				✓	✓	✓
	BM2.3	OSH Training Processes for all Personnel	✓							✓				✓	✓
BM3 – Communications	BM3.1	OSH Communications Process for Workers, Managers, Visitors, and Stakeholders	✓							✓					
	BM3.1.1	Hazardous Chemicals Warning Signs and Instructional Placards		✓	✓					✓					
	BM3.1.2	Hazardous Chemical Awareness, Communication and Training		✓	✓					✓					
	BM3.2	Confidential OSH Grievance without Fear of Reprisal or Intimidation	✓							✓					

			Mapped to the ILO recommended components for the Sound Management of Chemicals in the Workplace[1]												
RBA Code of Conduct	**SVAP-CM Audit Criteria**	**SVAP-CM Conformance Requirements**	General obligations, responsibilities, and duties	Classification and Labelling following the GHS	Chemical Safety Data Sheets	Operational Control Measures	Design and Installation	Work Systems and Practices	Personal Protection	Information and Training	Maintenance of Engineering Controls	Exposure Monitoring	Medical and Health Surveillance	Emergency Procedures and First Aid	Investigation and Reporting of Accidents, Occupational Diseases and Other Incidents
BM4 – Performance Review & Continuous Improvement	BM4.1	OSH Management Performance Review and Continuous Improvement Process	✓				✓	✓	✓	✓	✓				✓
	BM4.2	OSH Self-audit Process	✓			✓									
	BM4.3	OSH Corrective Action Process	✓			✓									✓
C2 – Hazardous Substances	C2.1	Hazardous Waste Disposal	✓												
	C2.1.1	Hazardous Chemical Inventory and Acquisition Process	✓	✓	✓	✓		✓		✓					
	C2.1.2	Chemical Handling Plan	✓			✓	✓	✓	✓	✓	✓		✓	✓	
	C2.1.3	Hazardous Chemical Storage	✓	✓	✓	✓	✓	✓						✓	
	C2.1.4	Hazardous Chemical Container Management	✓	✓	✓	✓	✓	✓			✓			✓	

Appendix 2: Mapping of RBA SVAP on Chemical Management to ISO 45001: 2018 Occupational Health and Safety Management System Elements

In 2018, ISO released ISO 45001 *Occupational health and safety management systems – Requirements with guidance for use* as the first international standard on health and safety at work. That standard specifies required elements for an occupational health and safety management system, and draws from former benchmarks including the OHSAS 18000 series and ILO-OSH 2001. The following table describes the material topic linkage between the RBA SVAP on Chemical Management and ISO 45001.

			Mapped to the ISO 45001: 2018 OHS Management System Elements[2]																		
			Leadership and Commitment	OH&S Policy	Organizational Roles, Responsibilities and Authorities	Consultation and Participation of Workers	Hazard Identification and Risk Assessment	Legal and Other Requirements	OH&S Objectives	Resources, Competence and Awareness	Internal and External Communication	Documentation and Information Control	Operational Planning and Control	Mitigation of OH&S Risks	Management of Change	Procurement	Emergency Preparedness and Response	Monitoring, Measurement, Analysis and Performance Evaluation	Internal Audit	Management Review	Incident, Nonconformity and Corrective Action	Continual Improvement
B1 – Occupational Safety	B1.1	OHS Hazards Identified, Assessed and Mitigated according to Hierarchy of Controls					✓			✓			✓	✓	✓			✓				
	B1.2.1	Hazardous Chemicals Assessment and Risk Management		✓			✓			✓			✓	✓	✓			✓				
	B1.2.2	Job Hazard Analyses for Routine and Non-routine Activities				✓	✓			✓	✓	✓	✓	✓				✓				
	B1.2.3	Chemical Handling and Housekeeping Practices				✓	✓			✓	✓	✓	✓	✓								
	B1.3	Reproductive Health Management for Pregnant Women and Nursing Mothers				✓	✓			✓	✓	✓	✓	✓								
B2 – Emergency Preparedness	B2.2	Emergency Preparedness and Response Programs		✓	✓	✓	✓				✓	✓	✓	✓			✓	✓				
	B2.2.1	Hazardous Chemical Emergency Management			✓	✓	✓				✓	✓	✓	✓			✓	✓				
	B2.2.2	Emergency Equipment is Appropriate, Maintained and Readily Available											✓	✓			✓	✓				

[2] International Organization for Standardization (ISO). *International Standard ISO 45001: 2018 Occupational health and safety management systems – Requirements with guidance for use*. First edition. https://knowledge.bsigroup.com/products/occupational-health-and-safety-management-systems-requirements-with-guidance-for-use/standard/preview

			Mapped to the ISO 45001: 2018 OHS Management System Elements[2]																		
			Leadership and Commitment	OH&S Policy	Organizational Roles, Responsibilities and Authorities	Consultation and Participation of Workers	Hazard Identification and Risk Assessment	Legal and Other Requirements	OH&S Objectives	Resources, Competence and Awareness	Internal and External Communication	Documentation and Information Control	Operational Planning and Control	Mitigation of OH&S Risks	Management of Change	Procurement	Emergency Preparedness and Response	Monitoring, Measurement, Analysis and Performance Evaluation	Internal Audit	Management Review	Incident, Nonconformity and Corrective Action	Continual Improvement
B3 – Occupational Injury & Illness	B3.1	Work Related Incidents are Reported, Investigated and Addressed				✓						✓	✓	✓				✓			✓	✓
	B3.1.1	Medical Surveillance				✓						✓	✓	✓				✓			✓	
B4 – Industrial Hygiene	B4.1	Occupational Exposures are Identified, Evaluated, and Controlled according to Hierarchy of Controls					✓						✓	✓	✓			✓				
	B4.1.1	Hazardous Chemicals Exposure Qualitative Risk Assessment					✓						✓	✓	✓			✓				
	B4.1.2	Exposure Control Plan			✓	✓	✓				✓	✓	✓	✓			✓	✓				
	B4.1.3	Hazardous Chemicals Exposure Quantitative Risk Assessment					✓						✓	✓	✓			✓				
	B4.1.4	Ventilation and Extraction Devices												✓	✓			✓				
	B4.1.5	Hazardous Chemicals Respiratory Protection Program		✓	✓	✓	✓				✓	✓	✓	✓			✓	✓				
BM1 – Risk Assessment	BM1.1	Process to Ensure Compliance with OSH Regulatory and Customer Requirements			✓			✓								✓			✓			
	BM1.2	Process to Identify and Assess Health and Safety Risks					✓						✓		✓		✓					
BM2 – Control Processes	BM2.1	OSH Responsibilities and Authorities for Implementation of Management Systems	✓	✓	✓										✓							
	BM2.2	OSH Policies and Control Processes		✓	✓				✓			✓	✓		✓							
	BM2.3	OSH Training Processes for all Personnel				✓	✓			✓	✓	✓										

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			Leadership and Commitment	OH&S Policy	Organizational Roles, Responsibilities and Authorities	Consultation and Participation of Workers	Hazard Identification and Risk Assessment	Legal and Other Requirements	OH&S Objectives	Resources, Competence and Awareness	Internal and External Communication	Documentation and Information Control	Operational Planning and Control	Mitigation of OH&S Risks	Management of Change	Procurement	Emergency Preparedness and Response	Monitoring, Measurement, Analysis and Performance Evaluation	Internal Audit	Management Review	Incident, Nonconformity and Corrective Action	Continual Improvement
BM3 – Communications	BM3.1	OSH Communications Process for Workers, Managers, Visitors, and Stakeholders			✓	✓			✓	✓	✓	✓										
	BM3.1.1	Hazardous Chemicals Warning Signs and Instructional Placards				✓				✓	✓	✓										
	BM3.1.2	Hazardous Chemical Awareness, Communication and Training				✓	✓			✓	✓	✓										
	BM3.2	Confidential OSH Grievance without Fear of Reprisal or Intimidation			✓	✓				✓	✓											✓
BM4 – Performance Review & Continuous Improvement	BM4.1	OSH Management Performance Review and Continuous Improvement Process							✓									✓		✓	✓	✓
	BM4.2	OSH Self-audit Process																	✓		✓	✓
	BM4.3	OSH Corrective Action Process																		✓	✓	✓
C2 – Hazardous Substances	C2.1	Hazardous Waste Disposal						✓	✓			✓	✓									
	C2.1.1	Hazardous Chemical Inventory and Acquisition Process					✓			✓	✓	✓			✓	✓						
	C2.1.2	Chemical Handling Plan		✓	✓					✓		✓	✓	✓	✓					✓		
	C2.1.3	Hazardous Chemical Storage										✓	✓	✓	✓					✓		
	C2.1.4	Hazardous Chemical Container Management		✓						✓		✓	✓	✓	✓					✓		