

Appendix D: Guidance Note on ISO 14001 and ISO 45001 Compliance

1. Purpose of Appendix D

The LME Policy on Responsible Sourcing of LME-Listed Brands (“LME Responsible Sourcing Policy”) requires that Producers of LME-listed Brands (“Brands”) are each certified as compliant with ISO 14001 and ISO 45001 (or Equivalent Certification Programmes (“ECPs”)), in respect of the production methods applied at the facility at which the Brand is produced.

This section outlines:

- The LME’s position on the migration of OHSAS 18001 to ISO 45001
- The routes to achieving compliance with ISO, and / or equivalent certification programmes
- The auditors / assessors which may be used in conducting ISO and equivalence assessments

Capitalised terms not otherwise defined in this guidance note shall have the meanings ascribed to them in the LME Responsible Sourcing Policy.

2. OHSAS 18001 Migration to ISO 45001

ISO 45001’s replacement of OHSAS 18001 was published on 12 March 2018, and ISO specified a three year migration period ending on 11 March 2021. ISO has specified that OHSAS 18001 certification will only be recognised until the end of the migration period. As such, Brands will be expected to be certified on ISO 45001 by the LME’s first ISO deadline of 31 December 2023.

3. Routes to compliance

There are two options for Producers to meet their LME environmental and occupational health management certification compliance, as summarised in Figure 1:

- Obtain and maintain ISO 14001 and ISO 45001 certification
- Obtain and maintain certification from an Equivalent Certification Programme

An ECP can be a standalone (internal or external) management system standard or a Track A standard that has been assessed as incorporating all the ISO requirements. Please note that should national, regional or international regulatory requirements also reflect certification equivalence (and be subject to an appropriate audit), the LME will also accept this as a route to equivalence.

To recognise ECP, an initial equivalence assessment conducted by an independent auditor will be required to establish that the certification programme covers all the ISO requirements. The equivalence assessment is a one-off assessment, unless the equivalent certification programme undergoes material revision, in which case the equivalence assessment will need to be reconfirmed. Any auditor that is qualified to conduct ISO 14001 and 45001 audits in a relevant jurisdiction should be able to conduct the equivalence assessment, but before beginning any assessment, the auditor will need to be approved by the LME via email to responsiblesourcing@lme.com. Please note that this is separate to the approved auditors for Track B.

Brand compliance is evidenced to the LME by provision of certification or equivalent documentation.

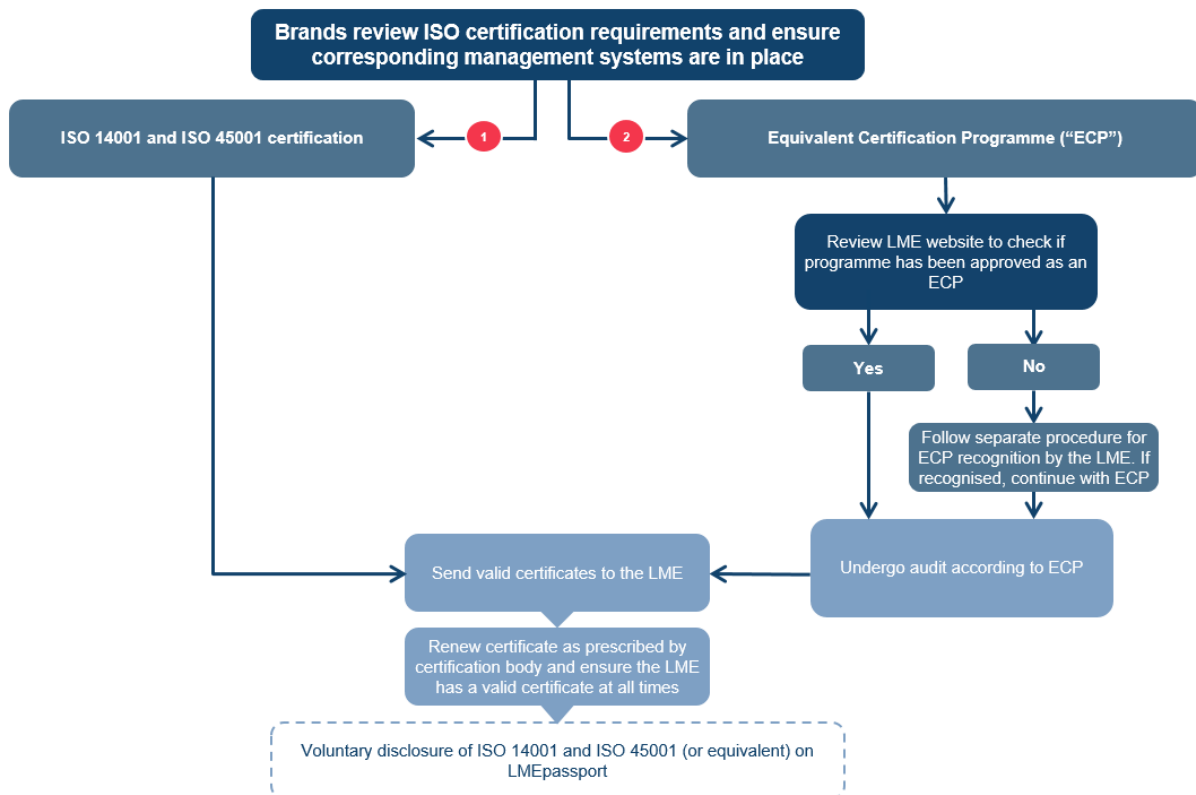


Figure i: ISO compliance flow chart

Option 1 – Obtain and maintain ISO 14001 and ISO 45001 certification

The process for Producers wishing to comply via direct ISO certification is as follows:

- (i) Review ISO 14001 and ISO 45001 certification requirements – these can be accessed via the ISO website¹. Note that an integrated approach to include ISO 9001, 14001, and 45001 is also an option.
- (ii) Ensure corresponding management systems are in place at the Brand-producing site. The scope should include the smelting or the equivalent step, in all cases being the final substantive step resulting in the production of LME grade metal
- (iii) Obtain a valid certification in line with ISO requirements
- (iv) Send to the certificates to the LME by (or before) the LME certification deadline of 31 December 2023 via email to responsiblesourcing@lme.com
- (v) Producers are to ensure that the LME is at all times in receipt of an unexpired, valid copy of each certification. Producers should also notify the LME should there be any change to certification status
- (vi) Optional: Producers may choose to disclose their certification on LMEpassport. For more information, please refer to the LME website²

Option 2 – Obtain and maintain certification from an Equivalent Certification Programme

- (i) Producer identifies a certification programme that it wishes to use for compliance
- (ii) Producer reviews the LME website³ for ECPs already accepted by the LME. If the Producer's intended ECP is listed then move directly to step (vii); if not continue to step (iii)
- (iii) Producer obtains permission of the certification programme owner if relevant and identifies an auditor who is qualified to conduct ISO 14001 and 45001 audits in a relevant jurisdiction. The

¹ <https://www.iso.org/certification.html>

² <https://www.lme.com/en/about/Responsibility/Sustainability/Sustainability-disclosures-on-LMEpassport>

³ <https://www.lme.com/en/About/Responsibility/Responsible-sourcing/Approved-partners>

- Producer sends the permission confirmation and proposed auditor name and credentials to the LME via email to responsiblesourcing@lme.com
- (iv) If LME accepts the proposed auditor, the Producer, the certification programme, or an agreed entity retains the auditor to conduct an equivalence assessment. The LME is available to answer questions on this process as needed
 - (v) Auditor conducts the assessment and if the auditor agrees that the certification programme is equivalent, sends report with the conclusion and the summary of findings to the LME for review
 - (vi) LME reviews the report and ratifies the equivalence, assuming no concerns are raised. The ECP can be listed on the LME website if the ECP owner agrees
 - (vii) Producer obtains valid certificates in line with the ECP's requirements
 - (viii) Producer sends the certificates to the LME by (or before) the deadline of 31 December 2023 via email to responsiblesourcing@lme.com
 - (ix) Producers are to ensure that the LME is at all times in receipt of an unexpired, valid copy of each certification. Producers should also notify the LME should there be any change to certification status
 - (x) Optional: Producers may choose to disclose their certification on LMEpassport if ECP is an approved disclosure. For more information, please refer to the LME website⁴

4. Auditor qualifications

Dependent on the route to compliance chosen, Producers may need to retain the services of an auditor. This section clarifies which auditors may be used for which step.

Audit of Brand against ISO 14001 and ISO 45001

ISO develops and maintains ISO standards but does not maintain lists of approved auditors or audit companies capable of assessing these standards. Auditor accreditations are issued independently of ISO by various national and international ISO member auditor certification bodies that operate globally. Certification bodies have lists of approved auditors, but there is no single global database for all qualified auditors.

The LME will recognise auditors accredited by ISO member certification bodies which may be found here: <https://www.iso.org/certification.html>. This gives Producers the opportunity to choose qualified auditors from a variety of bodies in the relevant location.

Equivalence assessment of a certification programme against ISO 14001 and/or ISO 45001

Any auditor that is qualified to conduct ISO 14001 and 45001 audits in a relevant jurisdiction should be able to conduct the equivalence assessment, but before beginning any assessment, the auditor will need to be approved by the LME via email to responsiblesourcing@lme.com.

Audit of Brand against ECP

The LME will accept auditors accredited by ISO member certification bodies to assess a Brand's compliance with an ECP. The ECP may have its own list of accredited auditors, in which case the Producer must follow the ECP's rules for acceptable auditors.

⁴ <https://www.lme.com/en/about/Responsibility/Sustainability/Sustainability-disclosures-on-LMEpassport>

Glossary

Term	Definition
Equivalent Certification Programme	means a certification programme that has been deemed by the LME to be equivalent to, or an improvement upon, the ISO 14001 and ISO 45001 certifications as described in the LME Responsible Sourcing Policy
ISO 14001	means the international standard prescribed by the International Organization for Standardization that specifies the framework requirements for an effective environmental management system. All references to ISO 14001 in this document are to the latest version – ISO 14001: 2015
ISO 45001	means the international standard prescribed by the International Organization for Standardization that specifies the framework requirements to improve employee safety, reduce workplace risks and create better, safer working conditions, all over the world. All references to ISO 45001 in this document are to the latest version – ISO 45001: 2019
OHSAS 18001	is a British Standard framework for an occupational health and safety management system (officially known as BS OHSAS 18001)