## **SEMS Management of Change**

1. **Purpose**

The purpose of this policy is to ensure safety, health, and environmental hazards are controlled when changes are made to the facility, equipment, material, supervisory personnel, operating conditions, or operating procedures that are not “replacement in kind”.

1. **Procedure**

* Changes must be recognized, documented, formally reviewed and approved before being implemented to avoid potential safety, environmental and operational impacts.
* All changes shall be managed using the Company’s Management of Change (MOC) written procedure.
* An MOC request shall be initiated when a proposed change or temporary change, not “replacement in kind,” may result in a change in risk.
* The change request should include the following:

1. A full description and technical basis for the change.
2. An analysis of the safety, health, and environmental considerations involved in the proposed change.
3. The necessary revisions of the operating procedures, safety and environmental procedures, safe work practices, and training program.
4. How the change will be communicated to affected personnel. Significant changes may require re-training as appropriate.
5. The expected duration of the change (if temporary) or expected completion date (if permanent).

* The MOC process will include the following steps:

1. Pre Start Up Review - each change request will be reviewed initially for procedural compliance, information quality, feasibility, and completeness to determine if it’s desirable and justified.
2. Authorize - If the proposed change meets the defined criteria, it will be assessed for the impact to safety, health, and the environment to determine what and whom the proposed change will affect. Once all HSE concerns have been met, the change request is signed for approval.
3. Implement & Communicate – the authorized MOC form will be returned to the originator who shall communicate the changes to all affected personnel. The MOC must be monitored and immediately canceled if found not suitable.

* All documents pertaining to the MOC shall be documented and kept on file for 2 years.

1. **Training**

Training shall be provided to all employees whose job tasks may be affected by a change in operations prior to startup.