

COS-3-05 / RP 75 4TH EDITION

COS/OOC GUIDANCE ON SAFETY AND ENVIRONMENTAL MANAGEMENT SYSTEM INTERFACE AGREEMENTS

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SEMS AUDIT & CERTIFICATES



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1. INTRODUCTION

The purpose of an Interface Agreement is to communicate safety and environmental management system expectations between Companies and Entities. Where interfaces are required, Companies and Entities should define the interface agreements and take appropriate action to ensure effective controls are managed throughout operations. The interface process should be facilitated by those with appropriate authority and responsibility.

This document provides guidance for the clear definition and documentation of safety and environmental management systems expectations with example interface agreements and guidance for selection, application, and use. The guidance is meant to aid Companies and Entities in managing the interface requirements of a management system¹.

Companies should have a component in place to address interface requirements for changing conditions, deviations, or contingencies not otherwise specified or outlined within this process.

2. ACRONYMS

- **SEMS** - Safety and Environmental Management System

3. DEFINITIONS²

- **Asset** - The equipment (individual items or integrated systems) or software used offshore.
- **Company** - An operator or contractor who intends to establish, implement, and maintain a SEMS.
- **Component (Management System)** - A policy, practice, procedure, or process that is a part of the overall safety and environmental management system of a Company.
- **Entity** - an operator or contractor that performs work and/or provides facilities, services, equipment, supplies and/or information for a Company or on a Company's asset.
- **Interface Agreement** - Agreement that provides clarity on which SEMS policies, processes, practices, or procedures will be followed for the performance of the work.

¹This guidance is meant to aid companies in meeting the interface requirements in 30 CFR 250.1914 and both the 3rd and 4th editions of API RP 75.

²The definitions are taken from API RP 75, 4th edition elements, from each of their safety and environmental management systems will be used to perform the work.

4. GUIDANCE

Figure 1 describes the process by which Companies may draft and implement an Interface Agreement.

Figure 2 describes the process of selecting the appropriate Interface Agreement template.

3 EXAMPLE AGREEMENTS ARE PROVIDED:

Appendix 1 – Entity agrees to comply and conform with Company’s SEMS

Appendix 2 – Company and Entity review and select which elements from each of their safety and environmental management systems will be used to perform the work

Appendix 3 – Company and Entity review and select which elements, and components within the elements, from each of their safety and environmental management systems will be used to perform the work.

FIGURE 1
PROCESS TO DRAFT & IMPLEMENT AN INTERFACE AGREEMENT

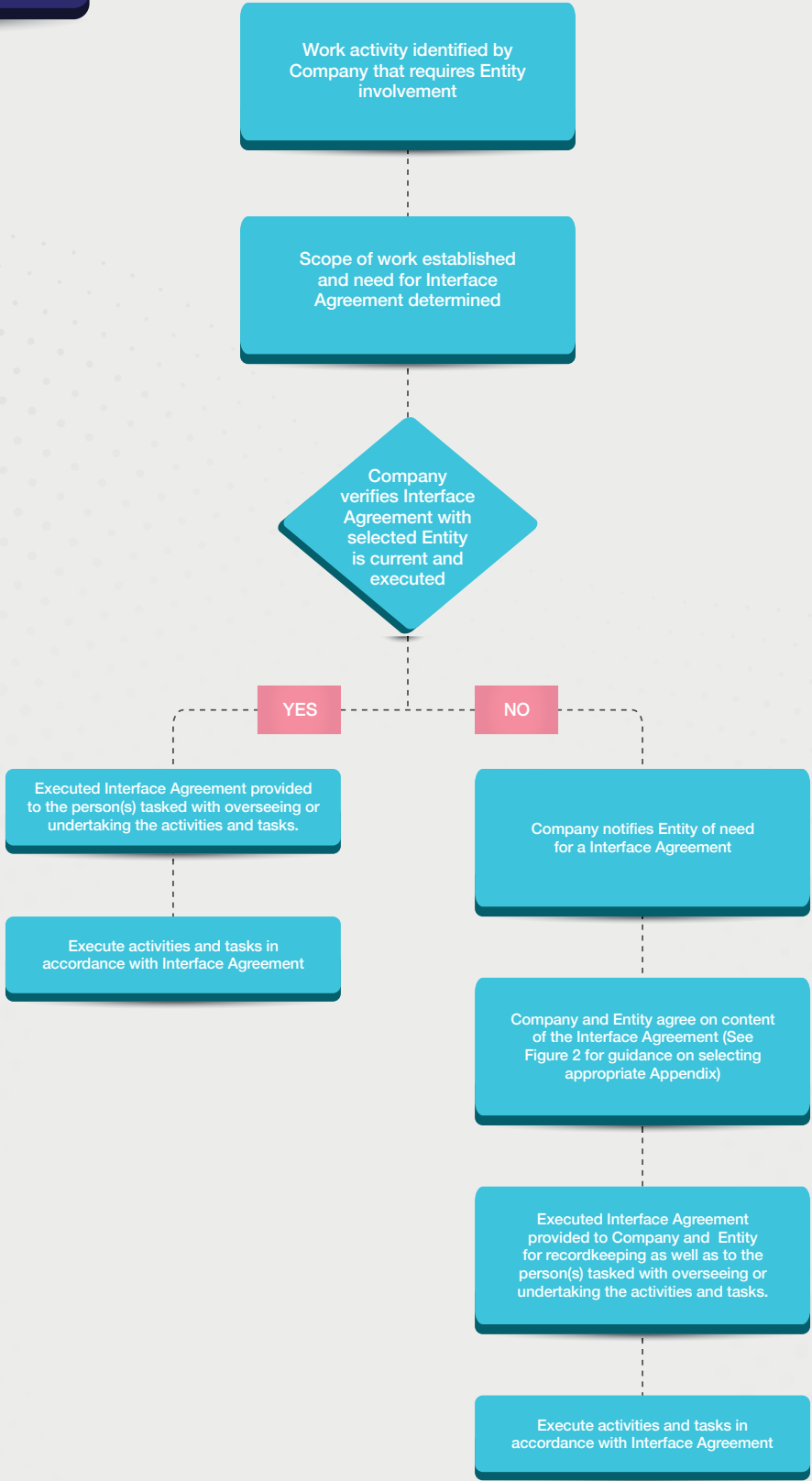
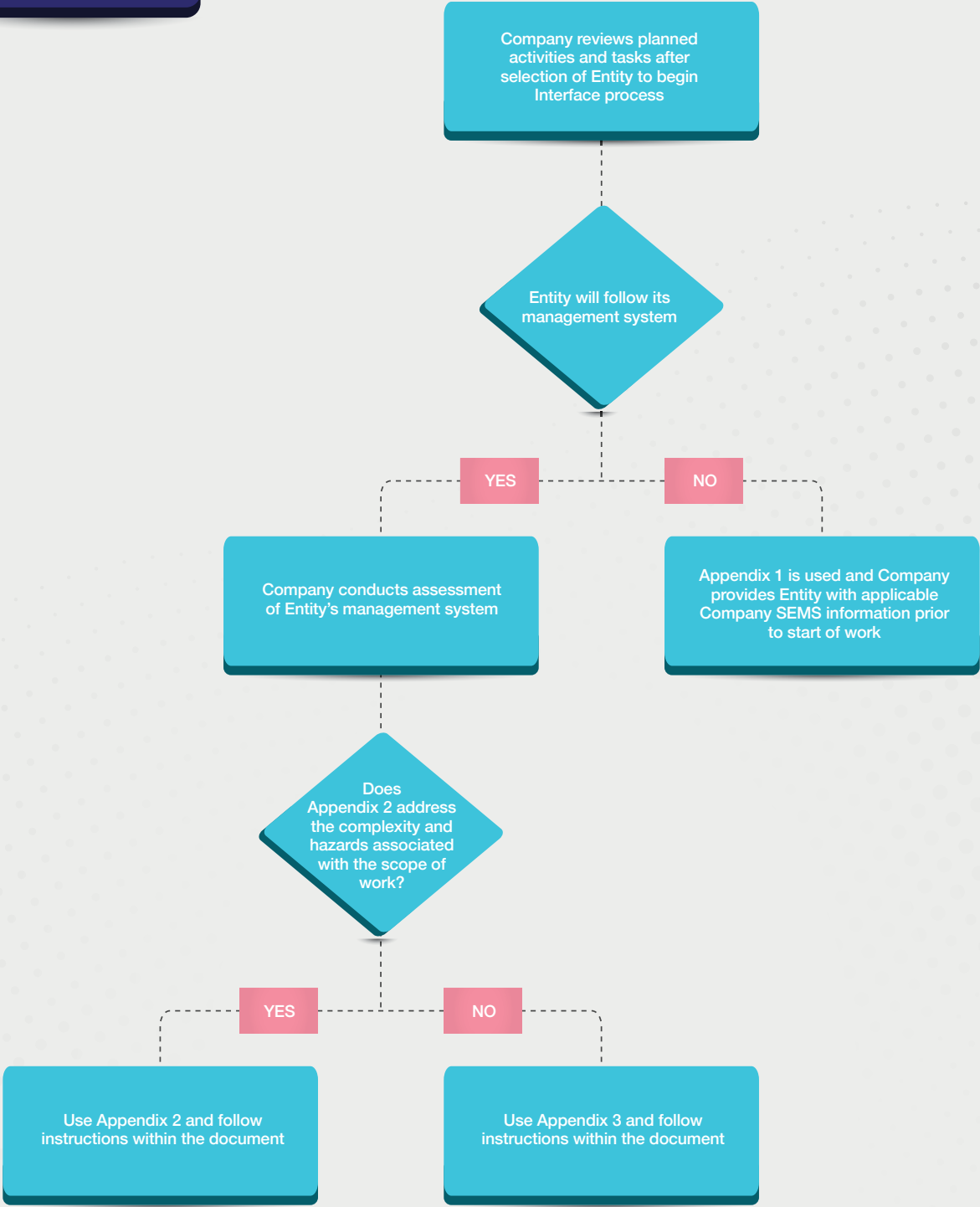


FIGURE 2
SELECTION OF AN
INTERFACE TEMPLATE



APPENDIX 1

This Agreement is made by and between (COMPANY):

and (ENTITY):

to specify responsibilities for how Company and Entity will promote safety and environmental protection by ensuring all personnel working on offshore operations and assets are complying with appropriate Safety and Environmental Management System (SEMS) policies, procedures, and practices of the Company.

Company confirms Entity has been provided with the relevant Company SEMS information.

ENTITY CONFIRMS:

- **It has reviewed and understands the relevant Company's SEMS requirements.**
- **It can and will perform its duties in conformance with relevant elements of Company's SEMS.**
- **Personnel used to perform the Entity's scope of work have the knowledge and skills necessary to perform their job in a safe and environmentally sound manner.**
- **The requirements of this agreement will be communicated and extended to all sub-contractors engaged by Entity.**

BY OUR SIGNATURES, WE AFFIRM AND ENDORSE THE CONTENT OF THIS INTERFACE AGREEMENT.

Company Representative: _____	Entity Representative: _____
Title: _____	Title: _____
Date: _____	Date: _____
Signature: _____	Signature: _____

APPENDIX 2 - SEMS INTERFACE AGREEMENT TEMPLATE INSTRUCTIONS

<p>USE</p>	<p>THIS TEMPLATE MAY BE USED TO CREATE A SEMS INTERFACE MATRIX.</p>
<p>SECTIONS</p>	<p>The Interface Matrix worksheet documents how Company and Entity Safety and Environmental Management Systems will interface to address each element of API RP 75, 4th edition. As part of the agreement, Company and Entity representatives will provide input to complete the matrix to identify which management system components will be used.</p> <p>The Agreement page should be updated and signed by both parties once agreement on the Matrix has been reached.</p>
<p>COLUMNS</p>	<p>For each element or element component, place an X in the Company or Entity column(s) to indicate the management system components to use at the worksite. If components of both systems are being used, place an X in both columns and provide details in the comments column.</p> <p>In the reference column, identify the document(s) that will be used in the execution of the work. A final column is provided for any additional comments or actions needed..</p>
<p>INSTRUCTIONS</p>	<ol style="list-style-type: none"> 1. Company and Entity should jointly complete the relevant parts of the Interface Matrix. 2. After completing the matrix, Authorized Representatives of the Company and Entity shall sign. 3. A signed Interface Agreement (including the Agreement page and Interface Matrix) should be provided to Company and Entity for recordkeeping as well as to the person(s) tasked with overseeing or undertaking the activities and tasks.

SAFETY AND ENVIRONMENTAL MANAGEMENT SYSTEM INTERFACE AGREEMENT

This Agreement is made by and between (COMPANY):

and (ENTITY):

to specify responsibilities for how Company and Entity will promote safety and environmental protection by ensuring all personnel working on offshore operations and assets are complying with appropriate Safety and Environmental Management System (SEMS) policies, procedures and practices identified within the Interface Matrix.

Company and Entity shall have access to relevant portions of each other's SEMS as identified within the Interface Matrix.

COMPANY AND ENTITY CONFIRM:

- They can and will perform their duties and conform to all pertinent elements as identified within the Interface Matrix.
- Personnel who perform work have the knowledge and skills necessary to perform their job in a safe and environmentally sound manner.
- The requirements of this agreement will be communicated and extended to all sub-contractors engaged by Entity.

The SEMS Interface Matrix identifies applicable documentation and programs within the SEMS elements that shall be used when Entity is performing work for the Company.

BY OUR SIGNATURES, WE AFFIRM AND ENDORSE THE CONTENT OF THIS INTERFACE AGREEMENT.

Company
Representative: _____

Entity
Representative: _____

Title: _____

Title: _____

Date: _____

Date: _____

Signature: _____

Signature: _____

SEMS INTERFACE MATRIX					
MANAGEMENT PROGRAM ELEMENTS	COMPANY	REFERENCE	ENTITY	REFERENCE	COMMENTS
1. LEADERSHIP					
2. SEMS INTERFACE MANAGEMENT					
3. RISK ASSESSMENT & RISK CONTROLS					
4. PROCEDURES					
5. SAFE WORK MANAGEMENT & SAFE WORK PRACTICES					
6. KNOWLEDGE & SKILLS					
7. ASSET DESIGN & INTEGRITY					

SEMS INTERFACE MATRIX (CONT)

MANAGEMENT PROGRAM ELEMENTS	COMPANY	REFERENCE	ENTITY	REFERENCE	COMMENTS
8. PROCEDURES					
9. PRE-STARTUP REVIEW (PSR)					
10. EMERGENCY PREPAREDNESS & RESPONSE					
11. INVESTIGATING & LEARNING FROM INCIDENTS					
12. EVALUATION & IMPROVEMENT OF SEMS					
13. SEMS INFORMATION					
14. OTHER REQUIREMENTS SPECIFIC TO THE OPERATIONAL AREA					

APPENDIX 3 - SEMS INTERFACE AGREEMENT TEMPLATE INSTRUCTIONS

<p>USE</p>	<p>THIS TEMPLATE MAY BE USED TO CREATE A SEMS INTERFACE MATRIX.</p>
<p>SECTIONS</p>	<p>The Interface Matrix worksheet documents how Company and Entity Safety and Environmental Management Systems will interface to address each element of API RP 75, 4th edition. As part of the agreement, Company and Entity representatives will provide input to complete the matrix to identify which management system components will be used.</p> <p>The Agreement page should be updated and signed by both parties once agreement on the Matrix has been reached.</p>
<p>COLUMNS</p>	<p>For each element or element component, place an X in the Company or Entity column(s) to indicate the management system components to use at the worksite. If components of both systems are being used, place an X in both columns and provide details in the comments column.</p> <p>In the reference column, identify the document(s) that will be used in the execution of the work. A final column is provided for any additional comments or actions needed..</p>
<p>INSTRUCTIONS</p>	<ol style="list-style-type: none"> 1. Company and Entity should jointly complete the relevant parts of the Interface Matrix. 2. After completing the matrix, Authorized Representatives of the Company and Entity shall sign. 3. A signed Interface Agreement (including the Agreement page and Interface Matrix) should be provided to Company and Entity for recordkeeping as well as to the person(s) tasked with overseeing or undertaking the activities and tasks.

SEMS INTERFACE DOCUMENT APPROVALS

This Agreement is made by and between (COMPANY):

and (ENTITY):

to specify responsibilities for how Company and Entity will promote safety and environmental protection by ensuring all personnel working on offshore operations and assets are complying with appropriate Safety and Environmental Management System (SEMS) policies, procedures and practices identified within the Interface Matrix.

Company and Entity shall have access to relevant portions of each other's SEMS as identified within the Interface Matrix.

COMPANY AND ENTITY CONFIRM:

- They can and will perform their duties and conform to all pertinent elements as identified within the Interface Matrix.
- Personnel who perform work have the knowledge and skills necessary to perform their job in a safe and environmentally sound manner.
- The requirements of this agreement will be communicated and extended to all sub-contractors engaged by Entity.

The SEMS Interface Matrix identifies applicable documentation and programs within the SEMS elements that shall be used when Entity is performing work for the Company.

BY OUR SIGNATURES, WE AFFIRM AND ENDORSE THE CONTENT OF THIS INTERFACE AGREEMENT.

Company Representative: _____

Entity Representative: _____

Title: _____

Title: _____

Date: _____

Date: _____

Signature: _____

Signature: _____

QUESTION	LEADERSHIP (API RP 75 ELEMENT 2)	COMPANY	REFERENCE	ENTITY	REFERENCE	COMMENTS
2.01	Have you established, implemented and maintain requirements for the following (Please describe how in the comments section).					
2.02	Defining and documenting managements commitment to and ownership of the SEMS.					
2.03	Assuring that safety and environmental risks are managed commensurate with the nature and magnitude of the risk, including risks associated with the interactions of individuals with each other, equipment, processes, and systems.					
2.04	Defining an organizational structure and clearly designating accountabilities to enable the establishment, implementation, maintenance, and continual improvement of the SEMS.					
2.05	Determining the roles, responsibilities, authorities, knowledge, and skills for all personnel within the scope of the SEMS.					
2.06	Providing the necessary resources and engaging affected personnel, including subject matter experts, for the design, implementation, maintenance, and continual improvement of the SEMS.					
2.07	Engaging proactively and visibly in the establishment, implementation, maintenance, and continual improvement of the SEMS.					
2.08	Establishing objectives and requirements, and timeframes for meeting the objectives and requirements.					

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SEMS INTERFACE DOCUMENT

QUESTION	LEADERSHIP (API RP 75 ELEMENT 2)	COMPANY	REFERENCE	ENTITY	REFERENCE	COMMENTS
2.09	Considering historical data, current activity, and future operations to establish indicators to monitor and improve performance.					
2.10	Providing personnel appropriate access to the SEMS.					
2.11	Communicating the expectations and effectiveness of the SEMS to personnel and stakeholders and appropriately responding to feedback.					
2.12	Identifying jurisdictional and internal requirements to be included in the SEMS.					
2.13	Holding personnel accountable for performing their work in accordance with the SEMS.					
2.14	Maintaining a work environment which promotes the sharing of concerns, mistakes, and observations as opportunities to learn.					
2.15	Evaluating the SEMS to assure and improve its suitability, adequacy, and effectiveness.					

PLEASE CONTINUE TO ELEMENT 3

QUESTION	SEMS INTERFACE MANAGEMENT (API RP 75 ELEMENT 3)	COMPANY	REFERENCE	ENTITY	REFERENCE	COMMENTS
3.01	Defining scope of work to be performed by other entities.					
3.02	Determining the roles, responsibilities, authorities, knowledge and skills of personnel involved in identifying, developing, and managing SEMS interfaces.					
3.03	Determining personnel skills and knowledge needed by other entities for the work.					
3.04	Determining the assets, supplies, and/or information to be provided by other entities for the work.					
3.05	Communicating the Company's applicable SEMS requirements to other prospective companies that may do the work.					
3.06	Communicating safety and environmental hazards that other entities can encounter or introduce.					
3.07	Determining the criteria for evaluating and selecting other entities.					
3.08	Agreeing on and communicating applicable SEMS requirements between the Company and other entities involved in the work.					

QUESTION	SEMS INTERFACE MANAGEMENT (API RP 75 ELEMENT 3)	COMPANY	REFERENCE	ENTITY	REFERENCE	COMMENTS
3.09	Documenting the SEMS interfaces.					
3.10	Providing site orientation for other entities' personnel performing the work, including agreed SEMS interfaces.					
3.11	Verifying the skills and knowledge of other entities' personnel performing the work.					
3.12	Verifying that other entities' facilities, equipment, supplies, and information for the work meet Company requirements.					
3.13	Verifying that the work is performed in accordance with agreed Company SEMS requirements and/or SEMS interfaces.					
3.14	Providing feedback on other entities' safety and environmental performance and the SEMS interfaces to drive improvement.					
3.15	Managing applicable SEMS interfaces among multiple other entities concurrently engaged in the company's work, including managing communications and decision-making in response to changing conditions.					

3

SEMS INTERFACE DOCUMENT

QUESTION	SEMS INTERFACE MANAGEMENT (API RP 75 ELEMENT 3)	COMPANY	REFERENCE	ENTITY	REFERENCE	COMMENTS
3.16	Using applicable expectations to manage interfaces among multiple other entities concurrently engaged in the work but hired by separate other entities.					
3.17	Managing requested deviations from the SEMS interface management process.					
3.18	Resolving identified deficiencies and improvement opportunities in SEMS interfaces.					
3.19	Managing change to SEMS interfaces.					

PLEASE CONTINUE TO ELEMENT 4

QUESTION	RISK ASSESSMENT AND CONTROLS (API RP 75 ELEMENT 4)	COMPANY	REFERENCE	ENTITY	REFERENCE	COMMENTS
4.01	Identifying the assets, activities, and tasks that require risk assessment and risk controls.					
4.02	Selecting risk assessment schedule and methodology. <i>Additional Consideration: Whose task level risk assessment (i.e. JSA) process will be used when conducting the work?</i>					
4.03	Determining the roles, responsibilities, authorities, knowledge, and skills of personnel involved in risk assessment and risk controls.					
4.04	Determining the personnel to be involved in specific risk assessments and risk controls.					
4.05	Identifying hazards associated with the assets, activities, and tasks that require risk assessment, including those associated with the interactions of individuals with each other, equipment, and systems.					
4.06	Performing risk assessment(s) for the identified hazards.					
4.07	Performing or revalidating risk assessments when work conditions change or when unanticipated hazards are identified during the course of the work.					
4.08	Recommending and approving actions and risk controls to manage risk based on Company decision-making processes.					

4

SEMS INTERFACE DOCUMENT

QUESTION	RISK ASSESSMENT AND CONTROLS (API RP 75 ELEMENT 4)	COMPANY	REFERENCE	ENTITY	REFERENCE	COMMENTS
4.09	Communicating risks and risk controls to affected personnel.					
4.10	Completing actions and implementing risk controls within an approved timeframe.					
4.11	Periodically reviewing risk assessments and risk controls to evaluate if they remain suitable, adequate, and effective.					
4.12	Managing requested deviations from risk assessment and controls.					
4.13	Resolving identified deficiencies and improvement opportunities in risk assessments and risk control.					
4.14	Managing changes to risk assessments and risk controls.					
4.15	Documenting risk assessment and risk controls.					

PLEASE CONTINUE TO ELEMENT 5

5 SEMS INTERFACE DOCUMENT						
QUESTION	PROCEDURES (API RP 75 ELEMENT 5)	COMPANY	REFERENCE	ENTITY	REFERENCE	COMMENTS
5.01	If ONLY Company's procedures will be used when performing the work, please select Company and go to Element 6.					
5.02	Identifying all the activities and tasks which require procedures.					
5.03	Incorporating risk controls, including applicable equipment and human barriers, from activity and task risk assessments, and other applicable sources into procedures.					
5.04	Determining the roles, responsibilities, authorities, knowledge, and skills of personnel accountable for developing, approving, maintaining, and using procedures.					
5.05	Determining the type, content, conventions, method of delivery, and communication of procedures, taking into account the intended procedure users.					
5.06	Developing, documenting, and approving procedures.					
5.07	Initially and periodically verifying procedures can be performed as documented and validating they will consistently produce the desired results.					
5.08	Accessing and using procedures as documented.					

5 SEMS INTERFACE DOCUMENT						
QUESTION	PROCEDURES (API RP 75 ELEMENT 5)	COMPANY	REFERENCE	ENTITY	REFERENCE	COMMENTS
5.09	Managing requested deviations from procedures.					
5.10	Responding to and communicating when procedures cannot be performed as documented or when procedures produce an unintended result.					
5.11	Engaging procedure users when verifying and validating procedures.					
5.12	Resolving identified deficiencies and improvement opportunities in procedures, including those identified from internal and external learnings.					
5.13	Managing changes to procedures.					

PLEASE CONTINUE TO ELEMENT 6

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SEMS INTERFACE DOCUMENT

QUESTION	SAFE WORK MANAGEMENT AND SAFE WORK PRACTICES (API RP 75 ELEMENT 6)	COMPANY	REFERENCE	ENTITY	REFERENCE	COMMENTS
6.01	If ONLY Company's Safe Work Practices will be used when performing the work, please select Company and go to Element 7.					
6.02	Identifying work which requires documented process for safe work management and for developing that process.					
6.03	Assessing risks and actions to be taken to address risks for each step to be undertaken prior to the execution of the work.					
6.04	Establishing criteria for escalating the review and authorization of the work.					
6.05	Handing over management of ongoing work.					
6.06	Managing SIMOPS.					
6.07	Identifying the types of work that require a documented safe work practice and for developing the safe work practices.					
6.08	Determining the roles, responsibilities, authorities, knowledge, and skills of personnel involved in developing and using safe work management and safe work practices.					

6

SEMS INTERFACE DOCUMENT

QUESTION	SAFE WORK MANAGEMENT AND SAFE WORK PRACTICES (API RP 75 ELEMENT 6)	COMPANY	REFERENCE	ENTITY	REFERENCE	COMMENTS
6.09	Engaging end-users in the development of safe work management and safe work practices to help mitigate error-likely situations from the interactions of individuals with each other, equipment, and systems.					
6.10	Communicating safe work management and safe work practices to affected personnel.					
6.11	Periodically verifying that the safe work management and safe work practices can be performed or used as documented.					
6.12	Validating safe work management and safe work practices.					
6.13	Managing requested deviations from safe work management and safe work practices.					
6.14	Resolving identified deficiencies and improvement opportunities in safe work management and safe work practices.					
6.15	Managing changes to safe work management and safe work practices.					
6.16	Documenting information related to safe work management and safe work practices.					

PLEASE CONTINUE TO ELEMENT 7

QUESTION	KNOWLEDGE AND SKILLS (API RP 75 ELEMENT 7)	COMPANY	REFERENCE	ENTITY	REFERENCE	COMMENTS
7.01	Do your personnel and subcontractors contracted to Company possess the knowledge and skills to carry out their duties and responsibilities? <i>Please respond in comment box</i>					
7.02	Do you use Company's Training Program (while contracted to Company)? Please select Company if you use only Company's program or Company and Entity if you use another program in addition to Company's.					
7.03	Identifying the roles and work that necessitate documented knowledge and skills management.					
7.04	Determining the roles, responsibilities, knowledge, and skills of personnel involved in knowledge and skills management.					
7.05	Incorporating impacts from the interactions of individuals with each other, equipment, and systems and error-likely situations into knowledge and skills management.					
7.06	Engaging applicable personnel in the design and continual improvement of knowledge and skills management.					
7.07	Determining the knowledge and skills for the identified roles, responsibilities, and work.					
7.08	Selecting the schedules and methods for delivering the knowledge and skills to the personnel assigned the identified roles and work.					

7

SEMS INTERFACE DOCUMENT

QUESTION	KNOWLEDGE AND SKILLS (API RP 75 ELEMENT 7)	COMPANY	REFERENCE	ENTITY	REFERENCE	COMMENTS
7.09	Delivering the knowledge and skills to the personnel assigned the identified roles and work.					
7.10	Periodically assessing personnel assigned the identified roles or work to validate retention of the determined knowledge and skills, and remediating if applicable.					
7.11	Periodically reviewing that the determined knowledge and skills are suitable, adequate and effective.					
7.12	Periodically evaluating that the content, methods, and personnel delivering the knowledge and skills are producing the desired results.					
7.13	Managing requested deviations from knowledge and skills requirements.					
7.14	Resolving identified deficiencies and improvement opportunities in knowledge and skills management.					
7.15	Managing changes to the determined knowledge and skills for the identified roles or work.					
7.16	Documenting the appropriate knowledge and skills management information.					

PLEASE CONTINUE TO ELEMENT 8

QUESTION	ASSET DESIGN AND INTEGRITY (API RP 75 ELEMENT 8)	COMPANY	REFERENCE	ENTITY	REFERENCE	COMMENTS
8.01	On whose facility is the work being done? Please select Company or Entity.					
8.02	If ONLY Company's Asset Design and Integrity program will be used when performing the work, please select Company and go to Element 9.					
8.03	Identifying the assets that are to be designed, operated and managed.					
8.04	Determining the roles, responsibilities, authorities, knowledge, and skills of personnel involved in asset design and integrity management.					
8.05	Determining the basis of design, operational limits, and expected performance of the identified assets.					
8.06	Determining the SEMS information necessary to safely manage asset design and integrity.					
8.07	Incorporating risk assessment actions and risk controls into asset design and integrity activities.					
8.08	Incorporating human performance aspects, including the impacts of the interactions of individuals with each other, equipment, and systems, into asset design and integrity activities.					
8.09	Determining the asset design and integrity activities to appropriately manage risk.					

8

SEMS INTERFACE DOCUMENT

QUESTION	ASSET DESIGN AND INTEGRITY (API RP 75 ELEMENT 8)	COMPANY	REFERENCE	ENTITY	REFERENCE	COMMENTS
8.10	Verifying that the asset design and integrity activities can be performed as intended.					
8.11	Verifying asset design specifications for new, newly acquired, or significantly modified assets.					
8.12	Determining the acceptance criteria, procedures, prioritization, frequency, schedule, and documentation information for the asset integrity activities.					
8.13	Reviewing the results and verifying the timelines of the asset design and integrity activities.					
8.14	Managing requested deviations from asset design and integrity activities.					
8.15	Resolving identified deficiencies and improvement opportunities in asset design and integrity activities.					
8.16	Managing spare parts for the identified assets.					
8.17	Managing changes to asset design and integrity activities.					
8.18	Documenting asset design and integrity activities.					

PLEASE CONTINUE TO ELEMENT 9

QUESTION	MANAGEMENT OF CHANGE (API RP 75 ELEMENT 9)	COMPANY	REFERENCE	ENTITY	REFERENCE	COMMENTS
9.01	Whose management of change (MOC) procedures do you use for modifications associated with:					
	(a) Equipment?					
	(b) Operating procedures?					
	(c) Personnel changes when there is a change in the organization or in personnel that supervise or operate the facility?					
	(d) Materials?					
	IF COMPANY FOR ALL PARTS OF 9.01, PLEASE GO TO ELEMENT 10.					
9.02	Identifying the types of changes that initiate the use of a MOC process.					
9.03	Identifying the MOC process, including the closure criteria, to be used for a given type of change.					
9.04	Determining the roles, responsibilities, authorities, knowledge, and skills of personnel involved in the MOC process.					
9.05	Defining the reason, scope, and planned duration of changes.					
9.06	Determining when a pre-startup review is necessary.					
9.07	Conducting risk assessment and implementing risk controls of safety and environmental hazards introduced or affected by the changes.					

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SEMS INTERFACE DOCUMENT

QUESTION	MANAGEMENT OF CHANGE (API RP 75 ELEMENT 9)	COMPANY	REFERENCE	ENTITY	REFERENCE	COMMENTS
9.08	Reviewing and approving changes and related actions prior to implementation.					
9.09	Communicating the changes and their impacts, including new or revised risk controls, to those determined to be affected by the changes, as appropriate.					
9.10	Completing actions and implementing changes within the approved timeframe.					
9.11	Determining how and when a change is closed.					
9.12	Managing requested deviations from the MOC process.					
9.13	Resolving identified deficiencies and improvement opportunities in the MOC process.					
9.14	Managing changes to the MOC process.					
9.15	Documenting the changes, including updating appropriate SEMS information.					

PLEASE CONTINUE TO ELEMENT 10

10 SEMS INTERFACE DOCUMENT						
QUESTION	PRE-STARTUP REVIEW (API RP 75 ELEMENT 10)	COMPANY	REFERENCE	ENTITY	REFERENCE	COMMENTS
10.01	If ONLY Company's Pre-Startup Review program will be used when performing the work, please select Company and go to Element 11.					
10.02	Identifying the criteria that trigger a pre-startup review (PSR).					
10.03	Identifying the PSR process(es) to be used taking into account the current state of the asset(s).					
10.04	Determining the roles, responsibilities, authorities, knowledge, and skills of personnel involved in PSR.					
10.05	Confirming the actual construction and equipment meets specifications.					
10.06	Confirming procedures are adequate and in place.					
10.07	Confirming relevant SEMS information is accurate and accessible.					
10.08	Confirming risk assessments and risk controls have been addressed and implemented.					

10 SEMS INTERFACE DOCUMENT						
QUESTION	PRE-STARTUP REVIEW (API RP 75 ELEMENT 10)	COMPANY	REFERENCE	ENTITY	REFERENCE	COMMENTS
10.09	Confirming affected personnel have the required knowledge and skills.					
10.10	Confirming applicable SEMS interfaces are managed.					
10.11	Managing requested deviations from the approved pre-startup process.					
10.12	Confirming identified deficiencies and improvement opportunities have been addressed prior to startups.					
10.13	Managing changes identified in the PSR or to the PSR process.					
10.14	Authorizing and communicating that the asset is ready for safe startup and operations.					
10.15	Documenting the PSR.					

PLEASE CONTINUE TO ELEMENT 11

11

SEMS INTERFACE DOCUMENT

QUESTION	EMERGENCY PREPAREDNESS AND RESPONSE (API RP 75 ELEMENT 11)	COMPANY	REFERENCE	ENTITY	REFERENCE	COMMENTS
11.01	If ONLY Company's Emergency Preparedness and Response program will be used when performing the work, please select Company and go to Element 12.					
11.02	Identifying scenarios that could necessitate emergency response.					
11.03	Developing documented emergency response plan(s) for identified scenarios.					
11.04	Determining the roles, responsibilities, authorities, knowledge, and skills for personnel involved in emergency preparedness and response.					
11.05	Communicating emergency response plans to affected organizations and personnel before an emergency and making plans appropriately accessible.					
11.06	Communicating or engaging with affected organizations and personnel during an emergency response.					
11.07	Identifying and using an incident command system as applicable.					
11.08	Organizing responders and resources to work together, make decisions, and respond to emergencies.					

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SEMS INTERFACE DOCUMENT

QUESTION	EMERGENCY PREPAREDNESS AND RESPONSE (API RP 75 ELEMENT 11)	COMPANY	REFERENCE	ENTITY	REFERENCE	COMMENTS
11.09	Identifying and verifying the availability and capability of organizations and resources for emergency preparedness and response.					
11.10	Periodically reviewing emergency response plans and revising as necessary.					
11.11	Defining, planning, and conducting drills and exercises on identified emergency scenarios on a periodic basis.					
11.12	Assessing drills, exercises, and actual responses to evaluate that the emergency preparedness and response delivers the desired results and to identify continual improvement opportunities.					
11.13	Managing requested deviations in emergency preparedness and response.					
11.14	Resolving identified deficiencies and improvement opportunities in emergency preparedness and response.					
11.15	Managing changes to emergency preparedness and response plan(s).					
11.16	Documenting emergency response information, including emergency response plans, drills and exercise scenarios, and results, and communicating these as appropriate.					

PLEASE CONTINUE TO ELEMENT 12

QUESTION	INVESTIGATING AND LEARNING FROM INCIDENTS (API RP 75 ELEMENT 12)	COMPANY	REFERENCE	ENTITY	REFERENCE	COMMENTS
12.01	Defining the types of incidents to be reported and/or investigated.					
12.02	Determining the roles, responsibilities, authorities, knowledge, and skills of personnel involved in incident investigation and sharing learnings.					
12.03	Determining the appropriate knowledge and skills needed by the individuals or team conducting the investigation, with consideration being given to knowledge of the operations, familiarity with investigation techniques, and other specialized knowledge that is viewed as relevant or necessary.					
12.04	Identifying the causes of incidents during an investigation.					
12.05	Incorporating human performance aspects into investigations and the identification of causes, including the role of the interactions between individuals, equipment, and systems, in contributing to or mitigating the incidents.					
12.06	Assigning personnel responsibilities and target dates for implementation and completion for actions that address the causes of the incident and tracking to resolution.					
12.07	Verifying and validating that the assigned actions were effective in addressing the causes of the incident.					
12.08	Appropriately sharing the cause(s) and lessons learned from internal or external incidents.					

12 SEMS INTERFACE DOCUMENT						
QUESTION	INVESTIGATING AND LEARNING FROM INCIDENTS (API RP 75 ELEMENT 12)	COMPANY	REFERENCE	ENTITY	REFERENCE	COMMENTS
12.09	Managing requested deviations from incident investigation and learning requirements.					
12.10	Resolving identified deficiencies and improvement opportunities in incident investigation and learning.					
12.11	Managing changes to incident investigation and learning.					
12.12	Documenting incident investigations and learnings.					

PLEASE CONTINUE TO ELEMENT 13

QUESTION	EVALUATION AND IMPROVEMENT OF SEMS (API RP 75 ELEMENT 13)	COMPANY	REFERENCE	ENTITY	REFERENCE	COMMENTS
13.02	Identifying the organizations, assets, and work to be evaluated.					
13.03	Determining the scope and objectives for evaluation activities.					
13.04	Selecting the types and methodologies for evaluation activities.					
13.05	Defining roles, responsibilities, authorities, knowledge, and skills of personnel planning, performing, and analyzing evaluation activities..					
13.06	Performing the evaluation activities per established schedules and frequencies.					
13.07	Analyzing the results of evaluation activities to assure that the SEMS continues to be suitable, adequate, and effective.					
13.08	Analyzing the results of evaluation activities to identify deviations, deficiencies, and improvement opportunities of the SEMS.					
13.09	Managing, prioritizing, and resolving the identified deviations, deficiencies, and improvement opportunities, including corrective actions.					

13 SEMS INTERFACE DOCUMENT						
QUESTION	EVALUATION AND IMPROVEMENT OF SEMS (API RP 75 ELEMENT 13)	COMPANY	REFERENCE	ENTITY	REFERENCE	COMMENTS
13.10	Communicating the results of evaluation activities to the appropriate stakeholders.					
13.11	Managing changes to SEMS evaluation and improvement activities or requirements.					
13.12	Documenting SEMS evaluation and improvement information, including the scope, results, and subsequent actions.					

PLEASE CONTINUE TO ELEMENT 14

QUESTION	SEMS INFORMATION (API RP 75 ELEMENT 14)	COMPANY	REFERENCE	ENTITY	REFERENCE	COMMENTS
14.01	The Company identifies, manages, and uses accurate, available, and current and historical (if relevant) SEMS information throughout the full scope of offshore operations.					
14.02	Determining the SEMS information to be created or managed, taking into account the intended users, interfaces, work, and decision-making processes.					
14.03	Determining the roles, responsibilities, authorities, knowledge, and skills of personnel involved in creating or managing SEMS information.					
14.04	Determining the criteria for controlling SEMS information, including access, security, documentation, communication (internally and externally), use, and retention.					
14.05	Managing the availability, control, distribution (internally and externally), use, and retention of SEMS information. <i>Additional Consideration: Location and accessibility of recent JSA.</i>					
14.06	Periodically verifying SEMS information is available, accurate, and controlled.					
14.07	Managing requested deviations from SEMS information management requirements.					
14.08	Resolving identified deficiencies and improvement opportunities in SEMS information.					
14.09	Managing changes to SEMS information.					



