

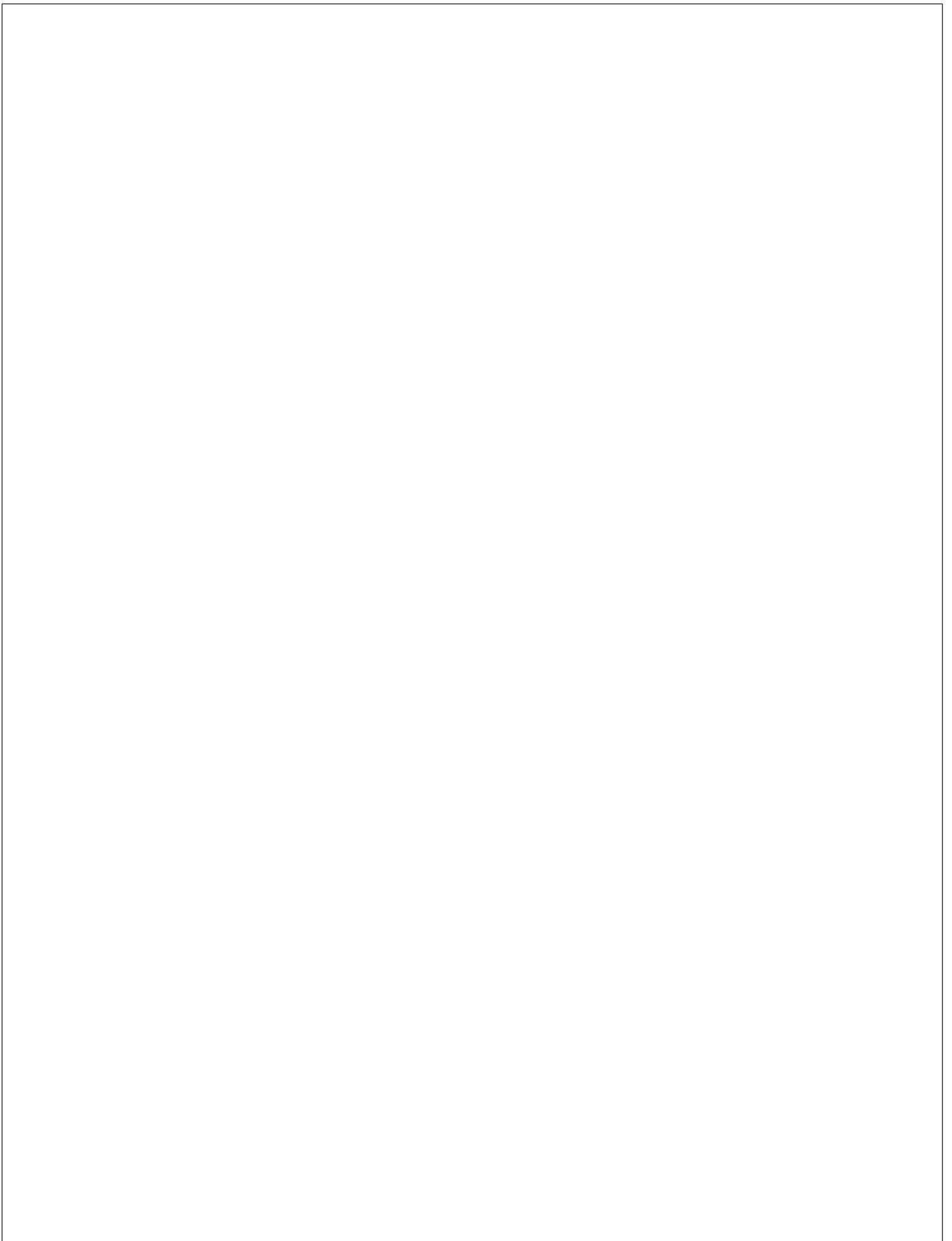


Requirements for Accreditation of Audit Service Providers Performing SEMS Audits and Certification of Deepwater Operations

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FOREWORD

In an effort to achieve excellence in safety performance of its deepwater operations, the oil and gas industry created the Center for Offshore Safety (COS) with the mission to “promote the highest level of safety for offshore drilling, completions, and operations through effective leadership, communication, teamwork, utilization of disciplined management systems and independent third-party auditing and certification”.

To support its mission, the COS has developed a strategy for promoting safety and protection of the environment. This strategy includes third-party auditing and certification of COS member companies’ safety and environmental management systems (SEMS) and accreditation of organizations (Audit Service Providers) providing audit services. The third-party audits are performed to assist COS member companies in implementing and maintaining a safety and environmental management system (SEMS) throughout their deepwater operations.

While international standards for conformity assessments (including third-party audits) exist, these are generic and applicable to any industry or organization. Therefore, the requirements in this document supplement these standards and define those specific to the COS audit program. They were developed to assist in providing credible and consistent third-party audits to API RP 75 and 30 CFR Part 250, Subpart S.

As used in this document, the term “good practice” is defined as a SEMS-related practice that has been identified by the audit service provider, the COS member company, and COS as being exemplary and one that could potentially benefit others in the industry by being shared. There may be many recognized good practices associated with a single SEMS-related element.

Requirements defined in this document may change from time to time if deemed necessary by the COS.

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1. Scope/Application

This document defines the requirements for the accreditation of organizations certifying and auditing a COS member company's SEMS (safety and environmental management system) to the requirements of API RP 75 and 30 CFR Part 250, Subpart S. It is applicable only to audits of deepwater oil and gas facilities and operations. These requirements are not intended for use outside U.S. Gulf of Mexico deepwater operations.

2. Acronyms

- 2.1 **AB** – Accreditation (Accrediting) Body
- 2.2 **ACC** – American Chemistry Council
- 2.3 **API** – American Petroleum Institute
- 2.4 **ASP** – Audit Service Provider
- 2.5 **COS** – Center for Offshore Safety
- 2.6 **CFR** – Code of Federal Regulations
- 2.7 **EMS** – Environmental Management System
- 2.8 **IAF** – International Accreditation Forum
- 2.9 **IEC** – International Electrotechnical Commission
- 2.10 **ISO** – International Organization for Standardization
- 2.11 **OHSAS** – Occupational Health and Safety Assessment Series
- 2.12 **RC** – Responsible Care
- 2.13 **RCMS** – Responsible Care management system
- 2.14 **RP** – Recommended Practice
- 2.15 **SEMS** – Safety and Environmental Management System

3. Definitions

- 3.1 **Accreditation** – the process of qualifying and approving ASPs to the requirements defined herein.

- 3.2 Accreditation (Accrediting) Body** – independent third-party organization that audits, qualifies and approves an ASP’s scheme and processes for certifying management systems.
- 3.3 Assessment** – process of evaluating the ASP’s management system, audit teams/auditor(s) performance and audits to API RP 75 and 30 CFR Part 250, Subpart S.
- 3.4 Assessment Team/Assessor(s)** – COS auditors performing assessments of ASP.
- 3.5 Audit Service Provider (ASP)** – independent third-party organization contracted by a COS member company to audit and certify its SEMS to the requirements of API RP 75 and 30 CFR Part 250, Subpart S.
- 3.6 COS SEMS Certificate** – a document issued to the COS member company as evidence that its SEMS has been audited by a COS-accredited third-party ASP and verified as conforming with the requirements of API RP 75 and 30 CFR Part 250, Subpart S.
- 3.7 COS SEMS Certification** – the process of issuing written evidence (the certificate) to a COS member company by a COS-accredited third-party ASP that it has audited its SEMS and verified that it conforms to the requirements of API RP 75 and 30 CFR Part 250, Subpart S at a specific period of time based on a specific sampling of deepwater facilities.
- 3.8 Office Assessment** – objective evaluation of ASP’s management system performed at the ASP’s office.
- 3.9 Provisional Accreditation** – temporary accreditation of an ASP that has satisfied application and office assessment requirements and has been scheduled for a witness of their API RP 75 and 30 CFR Part 250, Subpart S audit.
- 3.10 Third-party Audits** – objective verification of a COS member company’s SEMS by an independent auditor, or team of auditors, external to both the COS member company and the facilities covered under the SEMS.
- 3.11 Witness Assessments** – COS assessment of an ASP’s audit to verify that the audit is performed in accordance with applicable requirements and to verify the audit team’s impartiality and competence.
- 4. References and General Information**
- 4.1** The following referenced documents, or parts of the referenced documents, constitute provisions of this document. The latest edition of the referenced document (including any amendments) applies.

- **COS-2-01:** *Qualification and Competence Requirements for Audit Teams and Auditors Performing Third-party SEMS Audits of Deepwater Operations*
- **COS-2-02:** *Training Program Requirements for Auditors and Lead Auditors Performing Third-party SEMS Audits of Deepwater Operations*
- **COS-2-03:** *Requirements for Third-party SEMS Auditing and Certification of Deepwater Operations*
- **ISO/IEC 17021:** *Conformity Assessments – Requirements for bodies providing audit and certification of management systems*

4.2 The following documents contain useful information

- **COS-2-03-A:** *COS Standard Audit Report Template*
- **COS-2-03-B:** *COS Standard Audit Report without protocol questions*
- **API RP 75:** *Recommended Practice for Development of a Safety and Environmental Management Program for Offshore Operations and Facilities*
- **30 CFR Part 250, Subpart S:** *Oil and Gas and Sulphur Operations in the Outer Continental Shelf-Safety and Environmental Mangement Systems*

5. Confidentiality of Information

The ASP shall treat all information or data, in any format, obtained in the application of the COS third-party audit and certification program as confidential trade secrets. The ASP shall not share or disclose such information or data with other ASPs, other COS member companies or any other third-party unless agreed to in writing by the COS member company or other owner of such information or data, except as required by applicable law.

6. General Requirements

6.1 The ASP shall:

- **6.1.1** Show evidence that its management system has been accredited to ISO 17021 for EMS (ISO 14001), OHSAS, ACC RCMS or RC 14000 management system certification by an accreditation body (AB) that is a member of the International Accreditation Forum (IAF); or,
- **6.1.2** Undergo an assessment by the COS to verify that its management system meets the most current edition of ISO/IEC 17021 and the requirements for COS accreditation.

- 6.2** The ASP shall submit an annual signed declaration to the COS that all requirements for accreditation have been met in performing the audits.
- 6.3** The ASP shall have a documented process for ensuring that its auditors meet COS requirements for training, initial qualification and maintaining qualification as described in COS-2-01.
- 6.4** The ASP shall not provide SEMS-related consultancy services and/or training to COS member companies that the ASP will audit and certify. The requirements of this section do not apply to training that is open and available to the public.
- 6.5** The ASP shall appoint a contact person who will be responsible for coordinating and/or communicating with the COS regarding all matters related to its accreditation. The ASP shall notify the COS within 15 business days when the contact person is changed.
- 6.6** The ASP shall report to the COS member company any complaints on safety and environmental operations received against the certified COS member company.
- 6.7** The ASP shall provide auditors qualified to perform audits to API RP 75 and 30 CFR Part 250, Subpart S.
- 6.8** The ASP shall make arrangements with the COS member company for COS witness assessments. The ASP and the COS member company must allow, at the COS's discretion, the COS to participate and witness SEMS audits as required.
- 6.9** The ASP shall notify the COS of any significant changes to their management system polices and/or procedures, critical processes, ownership, organization, location and other significant changes that may impact its competence and credibility to perform third-party audits and certify SEMS, including the loss of existing accreditation to ISO 17021. COS shall have the right, in its sole discretion, to decide if an office assessment or witness assessment (not in the regular schedule) is required as a result of the changes.
- 6.10** Upon direction from the COS member company, the ASP shall submit a copy of the completed COS-2-03-A and COS-2-03-B to the COS at the close of the audit, i.e., audited COS member company has implemented corrective actions and the ASP has verified the effectiveness of the corrective actions. No company-identifying information shall be included in COS-2-03-A or COS-2-03-B that is submitted to COS.
- 6.11** Prior to issuing the accredited certificate to the COS member company, the ASP shall ensure that the COS has received completed copies of COS-2-03-A and COS-2-03-B for the audit.

- 6.12** When agreed with and authorized by the COS member company, the ASP shall also submit to the COS, a summary of the good practice(s) identified during the audit.

7. Initial Accreditation

7.1 Prior to Application

The ASP must be able to meet the following requirements before an application for accreditation is submitted to the COS:

- 7.1.1** Implementation of a management system that meets the requirements of the most current edition of ISO 17021 for EMS and/or OHSAS and/or RCMS and COS accreditation;
- 7.1.2** Training of personnel involved in the implementation of processes for third-party audits, including auditors, on API RP 75 and 30 CFR Part 250, Subpart S requirements has been completed; and,
- 7.1.3** Qualification of audit team leads and auditors to the requirements of COS-2-01 for third-party auditing to and API RP 75 and 30 CFR Part 250, Subpart S.

7.2 Application and Document Review

An ASP applying for accreditation must submit the following to the COS:

- 7.2.1** Completed application form and signed accreditation agreements;
- 7.2.2** Certificate(s) of Accreditation to ISO/IEC 17021 for the management system standards identified in 6.1.1, if available;
- 7.2.3** Management System Policy Manual that addresses the applicable requirements of ISO/IEC 17021 and COS Certification program. The ASP's Management System Policy Manual shall identify the requirements of ISO 17021 that do not apply and provide justification for the exclusion.
- 7.2.4** Documented evidence of personnel competence as required by ISO 17021 and COS of those involved in the SEMS audit and certification process, including the auditors; and
- 7.2.5** Payment of applicable fees.

COS shall review the application and documents submitted. The applicant ASP shall address nonconformities, if any, identified during the application and initial documentation review before the COS performs the initial office assessment.

7.3 Initial Assessments

- 7.3.1** The ASP shall undergo an initial office and witness assessment by the COS before accreditation may be granted.
- 7.3.2** Based on the results of the initial office assessment, the COS shall make the decision regarding provisional accreditation subject to the COS's witnessing of an ASP audit to API RP 75 and 30 CFR Part 250, Subpart S. Provisional accreditation shall not be granted until all nonconformities identified, if any, during the initial office assessment, are addressed and accepted by the COS.
- 7.3.3** The COS shall witness an ASP SEMS audit to API RP 75 and 30 CFR Part 250, Subpart S.
- 7.3.4** Based on the results of the witness assessment, the COS shall make a decision regarding full accreditation. Accreditation shall not be granted until all the nonconformities identified, if any, during the witness assessment are addressed and accepted by the COS. A re-witnessing may be performed if deemed necessary by the COS.
- 7.3.5** The ASP shall not issue Certificates for audits performed prior to the initial application for accreditation.
- 7.3.6** Certificates for audits performed after the accreditation application is submitted shall only be issued once accreditation is granted. These audits shall be reviewed by the COS as part of the initial accreditation process. If the ASP fails to achieve accreditation, no certificates shall be issued.

8. Maintaining Accreditation

- 8.1** The accreditation cycle shall be three (3) years.
- 8.2** The accredited ASP shall comply with all requirements, including provisions of the accreditation agreement, which shall take effect on the date the accreditation is granted. The accreditation may be suspended in the event that the ASP is found to be not in conformance to any of these requirements.
- 8.3** The accredited ASP shall undergo annual office assessments and witness assessments during the two years following the initial accreditation or re-accreditation. The duration of these assessments shall be determined by the COS.

9. Re-accreditation

- 9.1** At least six (6) months before the current accreditation expires, the ASP shall submit application documents for re-accreditation. These documents are identified in 7.2.
- 9.2** The ASP shall undergo an office and witness assessment before accreditation expires.
- 9.3** Based on the results of the assessments, the COS shall make the re-accreditation decision. Re-accreditation shall not be granted until all nonconformities identified, if any, during the assessments are addressed and accepted by the COS. A re-assessment (either office or witness) may be performed if deemed necessary by the COS.

10. Withdrawal, Suspension and Cancellation of accreditation

- 10.1** COS accreditation can be suspended, cancelled or withdrawn in the event an ASP fails to meet the requirements identified in COS-2-01, COS-2-02, COS-2-03, COS-2-04, or other requirements as applicable.
- 10.2** Suspension or loss of accreditation to ISO 17021 for any of the management system standards in 6.1.1 shall result in the suspension or withdrawal of COS accreditation.
- 10.3** The ASP shall notify the COS, in writing, of the suspension within two (2) business days of notification by the accrediting body (AB) with the reason(s) for suspension. Failure to notify the COS within the specified time frame shall result in the cancellation of the accreditation.
- 10.4** Suspended COS accreditation resulting from the suspension of ISO 17021 accreditation shall only be reinstated after:
 - 10.4.1** The suspension has been lifted by the AB; and
 - 10.4.2** Submission of an action plan to the COS to address cause of the suspension by the ASP.
- 10.5** Failure to meet the requirements specified in this document and/or any provision of the accreditation agreement may result in the suspension or cancellation of accreditation.
- 10.6** Failure to be reinstated within six (6) months of suspension shall result in the cancellation of the accreditation.

- 10.7** Failure to be re-accredited by the expiration date shall result in the withdrawal of the accreditation.
- 10.8** Withdrawn and cancelled accreditation shall require re-application for future consideration into the accreditation program.
- 10.9** An ASP accreditation that is cancelled for cause shall only be allowed to re-apply for accreditation after one (1) year from the date of cancellation.

11. Use of the COS Marks and/or Logo

- 11.1** Use of the COS marks and/or logo by the COS member company shall be governed by the company's COS participation agreement with API.
- 11.2** The ASP shall use COS marks and or logos only as permitted under its accreditation agreement with API.
- 11.3** The ASP shall report to COS any instance where the COS marks and/or logo are being used by the COS member company on equipment or materials intended for use in exploration or production activity.