

**COS-2-06**

# REQUIREMENTS FOR ACCREDITATION OF AUDIT SERVICE PROVIDERS ISSUING SEMS CERTIFICATES

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**SEMS AUDIT &  
CERTIFICATIONS**



**GOOD PRACTICE  
DEVELOPMENT**



**DATA COLLECTION,  
ANALYSIS & REPORTING**



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# 1. SCOPE / APPLICATION

This document defines the Center for Offshore Safety (COS) requirements for an organization to become an accredited Audit Service Provider (ASP) to issue COS Safety and Environmental Management System (SEMS) certificates jointly with the COS to auditees pursuant to COS-2-05, *Requirements for COS SEMS Certificates*.

## 2. ACRONYMS

- **AB** - accreditation (accrediting) body
- **API** - American Petroleum Institute
- **ASP** - Audit Service Provider
- **ASPMS** - Audit Service Provider Management System
- **APM** - Accreditation Program Manager
- **COS** - Center for Offshore Safety
- **IEC** - International Electrotechnical Commission
- **ISO** - International Organization for Standardization
- **RP** - recommended practice
- **SEMS** - Safety and Environmental Management Systems
- **US OCS** - United States Outer Continental Shelf

## 3. DEFINITIONS

- 3.1 All definitions found in COS-2-04, *Requirements for Accreditation of Audit Service Providers Performing SEMS Audits* (2<sup>nd</sup> Edition) shall apply to this document.
- 3.2 COS SEMS certificate (certificate) - A document issued to an auditee pursuant to COS-2-05 as evidence that its:
- SEMS has been audited by a COS-accredited ASP;
  - SEMS audit conformed with requirements of COS-2-03, *COS Requirements for SEMS Auditing*; and
  - Corrective actions that address nonconformities identified during the audit have been confirmed as closed by the ASP.
- 3.3 Enhanced Audit Service Provider Management System (Enhanced ASPMS) - An applicant/ASP's ASPMS that has been enhanced to meet the requirements to issue certificates pursuant to COS-2-05.

## 4. REFERENCES AND GENERAL INFORMATION

- 4.1 The referenced documents, or parts of the referenced documents, shown in Appendix 1, Part A shall constitute provisions of this document.

Note: Additional documents shown in Appendix 1, Part B contain useful information.

- 4.2 As new editions of the referenced and additional documents are published, the AB shall issue guidance on their implementation.

## 5. CONFIDENTIALITY OF INFORMATION

The ASP shall treat all information or data, in any format, obtained in conducting SEMS audits and evaluation of corrective action as confidential business information. ASP shall not share or disclose such information or data with any third party unless agreed to in writing by the auditee or other owner of such information or data, except as required by applicable law or pursuant to this document.





# 6. GENERAL REQUIREMENTS

COS SEMS Certificates shall be issued jointly by an ASP and the COS in accordance with COS-2-05. SEMS Certificates shall only be issued by ASPs that are accredited by the COS or have been granted provisional accreditation by the COS pursuant to COS-2-04 and this document.

This document supplements the accreditation requirements of COS-2-04 for the purpose of accrediting an ASP to be able to issue certificates jointly with the COS. In all cases where COS-2-04 specifies requirements for an applicant's or ASP's ASPMS, this document requires that the ASPMS be enhanced to include ASP requirements for issuing SEMS certificates pursuant to COS-2-05 and this document.

## 6.1 Applicants shall:

- 6.1.1. Conform with all requirements for applicants described in COS-2-04.
- 6.1.2. Declare to the COS whether they intend to conduct SEMS audits and issue Certificates for operations solely within the United States Outer Continental Shelf (US OCS), or within and outside the US OCS.
- 6.1.3. Provide evidence to the COS that it has established, implemented, and is maintaining an Enhanced ASPMS that includes procedures for conforming with requirements of COS-2-05;
- 6.1.4. Undergo initial office assessments as required by the COS to verify that their Enhanced ASPMS meets the requirements of ISO/IEC 17021-1 and the requirements for COS accreditation, and that the applicant is operating in conformance with its Enhanced ASPMS;
- 6.1.5. Undergo special office assessments if required by the COS with a scope defined by the COS (e.g., a subset of the Enhanced ASPMS).
- 6.1.6. Notify the COS of any significant changes to its management system policies and/or procedures, critical processes, ownership, legal name, organization, location, and other significant changes that may impact its competence, impartiality, or credibility to issue SEMS certificates.

## 6.2 ASP shall:

- 6.2.1. Comply with requirements of their signed agreement with the COS and COS-2-04.
- 6.2.2. Undergo surveillance, re-accreditation and special office assessments as required by the COS to verify that their Enhanced ASPMS meets the most current edition of ISO/IEC 17021-1 and the requirements for COS accreditation, and that the ASP is operating in conformance with its Enhanced ASPMS;
- 6.2.3. Undergo initial, surveillance, re-accreditation, and special witness assessments as required by the COS of the ASP performing a SEMS audit to verify that the ASP can perform an effective SEMS audit and verify closure of auditee corrective action in conformance with its Enhanced ASPMS;
- 6.2.4. Submit a signed declaration to the COS, by January 31<sup>st</sup> of each year, that during the prior calendar year all requirements for accreditation have been met in performing SEMS audits, and that verifies closure of auditee corrective action referencing conformance to COS-2-05, COS-2-06, and their Enhanced ASPMS;

- 6.2.5. Arrange with the auditee (and their contractors as applicable) for COS assessor(s) to be present on the auditee's property when necessary to perform witness assessments of the ASP evaluating auditee corrective action(s); and
- 6.2.6. Notify the COS of any significant changes to its Enhanced ASPMS (e.g., management system policies and/or procedures, critical processes, ownership, legal name, organization, location) and other significant changes that may impact its competence, impartiality, or credibility to perform SEMS audits and issue SEMS Certificates, including the loss of existing accreditation to ISO 17021-1 by other accreditation bodies.
- 6.3. The COS shall have the right, in its sole discretion, to decide if a special office assessment or witness assessment is required because of the changes identified under 6.1.6 or 6.2.6, or whether to change the status of the applicant/ASP's accreditation.
- 6.4. Applicants/ASPs shall develop an action plan to address COS-identified nonconformities (e.g., from review of an application or a COS assessment), and enter it into the portal within 30 days of having been notified that nonconformity(-ies) were posted in the portal.
- 6.5. Unless a longer timeframe is otherwise approved by COS, applicants/ASPs shall complete their action plan within four months to COS's satisfaction and keep the COS assessor and APM apprised of progress and/or delays.
- 6.6. Lack of a response or not completing corrective action(s) that address the underlying cause(s) within the time frame may, at the discretion of the COS:
  - require resubmission of information describing the Enhanced ASPMS;
  - require another assessment; or
  - result in downgrading the accreditation status to provisional, suspension, or cancellation.

## 7. APPLICATION FOR ACCREDITATION TO ISSUE SEMS CERTIFICATES

- 7.1 Applicants shall describe their Enhanced ASPMS to the COS by completing an application in the portal and providing supporting documentation.
- 7.2 The Enhanced ASPMS shall include the information specified in Appendix 3.
- 7.3 Initial applicants shall complete at least one internal audit and management review of their Enhanced ASPMS prior to the COS review noted in 7.4.
- 7.4 The COS shall review the Enhanced ASPMS for content and conformance with COS and ISO/IEC 17021-1 requirements for issuing certificates.
- 7.5 COS-issued nonconformities concerning the application shall be addressed in accordance with COS-2-04.



## 8. ASSESSMENTS

- 8.1 Office assessments as described in COS-2-04 shall be conducted by the COS to confirm that the applicant or ASP has implemented and maintained their Enhanced ASPMS.
- 8.2 Witness assessments as described in COS-2-04 shall be conducted by the COS to confirm the ASP's ability to perform a SEMS audit and issue COS certificates in accordance with their Enhanced ASPMS, RP 75, COS-2-03 and COS-2-05.
- 8.3 Other aspects of assessments are managed as described in COS-2-04.

## 9. ACCREDITATION TO ISSUE SEMS CERTIFICATES

- 9.1 Provisional accreditation to issue SEMS certificates can be granted to applicants that have completed the:
- application process described in Section 7; and
  - office assessment process described in Section 8.
- 9.2 Provisional accreditation can be advanced to accreditation to Issue SEMS certificates if:
- the ASP completes the witness assessment process described in Section 8; and
  - is approved for accreditation through COS's internal decision process described in COS-2-04.

Note: All other aspects of accreditation to issue SEMS certificates, including decisions, maintaining accreditation, re-accreditation, changes to accreditation, and the term of accreditation are as described in COS-2-04.

## 10. USE OF THE COS MARKS AND/OR LOGO

The ASP shall use the COS marks and/or logos only as permitted under its accreditation agreement with the COS.



# APPENDIX 1 - REFERENCES AND GENERAL INFORMATION

## A. REFERENCED DOCUMENTS

1. **API Recommended Practice 75, 3rd Edition:** *Recommended Practice for Development of a Safety and Environmental Management Program for Offshore Operations and Facilities*; May 2004.
2. **API Recommended Practice 75, 4th Edition:** *Recommended Practice for Safety and Environmental Management System for Offshore Operations and Assets*; December 2019.
3. **Center for Offshore Safety Publication COS-2-01, 2nd Edition:** *Qualification Requirements for Audit Service Provider Personnel Involved in Performance of SEMS Audits*; January 2024.
4. **Center for Offshore Safety Publication COS-2-03, 3rd Edition:** *Requirements for Third-party SEMS Auditing*; May 2023.
5. **Center for Offshore Safety Publication COS-2-04, 2nd Edition:** *Requirements for Accreditation of Audit Service Providers Performing SEMS Audits*; January 2024.
6. **Center for Offshore Safety Publication COS-2-05:** *Requirements for COS SEMS Certificates*, First Edition; July 2020.
  - i. International addendum, May 2023
7. **Center for Offshore Safety Publication COS-1-06 for RP 75 3rd Edition:** *Guidance for Developing a SEMS Audit Plan*, Second Edition; May 2023.
8. **Center for Offshore Safety Publication COS-1-06 for RP 75 4th Edition:** *Guidance for Developing a SEMS Audit Plan*, First Edition; August 2023.
9. **Center for Offshore Safety Publication COS-1-08 for RP 75 3rd Edition:** *SEMS Audit Report Format and Guidance*, Second Edition; May 2023.
10. **Center for Offshore Safety Publication COS-1-08 for RP 75 4th Edition:** *SEMS Audit Report Format and Guidance*, First Edition; August 2023.
11. **ISO/IEC 17021-1:** *Conformity Assessment – Requirements for bodies providing audit and certification of management systems – Part 1: Requirements*; First Edition; June 2015 (certain exceptions apply, see Appendix 2 herein).

# B. DOCUMENTS CONTAINING USEFUL INFORMATION

1. **Center for Offshore Safety Publication COS-1-07 for RP 75 3rd Edition:** *Guidance for Developing a SEMS Corrective Action Plan*, Second Edition; May 2023.
2. **Center for Offshore Safety Publication COS-1-07 for RP 75 4th Edition:** *Guidance for Developing a SEMS Corrective Action Plan*, First Edition; August 2023.
3. **Center for Offshore Safety Publication COS-1-09/RP 75, 3rd Edition:** *Guidance for Conducting SEMS Audits – For API Recommended Practice 75, 3rd Edition*; Second Edition; June 2023.
4. **Center for Offshore Safety Publication COS-1-09/RP 75, 4th Edition:** *Guidance for Conducting SEMS Audits*, First Edition; May 2023.
5. **Center for Offshore Safety Publication COS-1-10:** *Guidance for Remote Audits*, First Edition: May 2023.
6. **Center for Offshore Safety Publication COS-2-01, 1st Edition:** *Qualification and Competence Requirements for Audit Teams and Auditors Performing Third-party SEMS Audits of Deepwater Operations*; October 2012.
7. **Center for Offshore Safety Publication COS-2-02, 1st Edition:** *Training Program Requirements for Auditors and Audit Team Leads Performing Third-party SEMS Audits of Deepwater Operations*; October 2012.
8. **Center for Offshore Safety Publication COS-2-03, 1st Edition:** *Requirements for Third-party SEMS Auditing and Certification of Deepwater Operations*; October 2012.

## APPENDIX 2 - EXCLUSIONS FROM REQUIREMENTS

### ISO/IEC 17021-1 Exclusions

The following sections of ISO/IEC 17021-1 shall not apply to this document:

1. Anything relating to surveillance audits, including Section 9.6.2;
2. Paragraph 9.5.3.2 (concerns timing for verifying corrective action implementation and repeat of the audit); and
3. Section 9.6 (Maintaining Certification).

# APPENDIX 3 - COS ENHANCED AUDIT SERVICE PROVIDER MANAGEMENT SYSTEM REQUIREMENTS

This list identifies additional requirements that ASP's shall satisfy in their Enhanced Audit Service Provider Management System (Enhanced ASPMS) to be accredited to issue SEMS certificates. These are in addition to the ASPMS requirements defined in COS-2-04. All requirements for an ASPMS shown in COS-2-04 shall be suitable for both conducting SEMS audits and issuing SEMS certificates to be accredited to issue SEMS certificates.

1. A signed declaration to the COS that all requirements for accreditation will be met when performing SEMS audits and issuing SEMS certificates;
2. A documented process for selection of personnel verifying auditee corrective action and making decisions regarding whether to issue a SEMS certificate;
3. A documented process for determining whether to issue a SEMS certificate; and
4. A statement whether the ASP wishes to be considered for SEMS audits and issuance of SEMS certificates outside the US OCS.









