

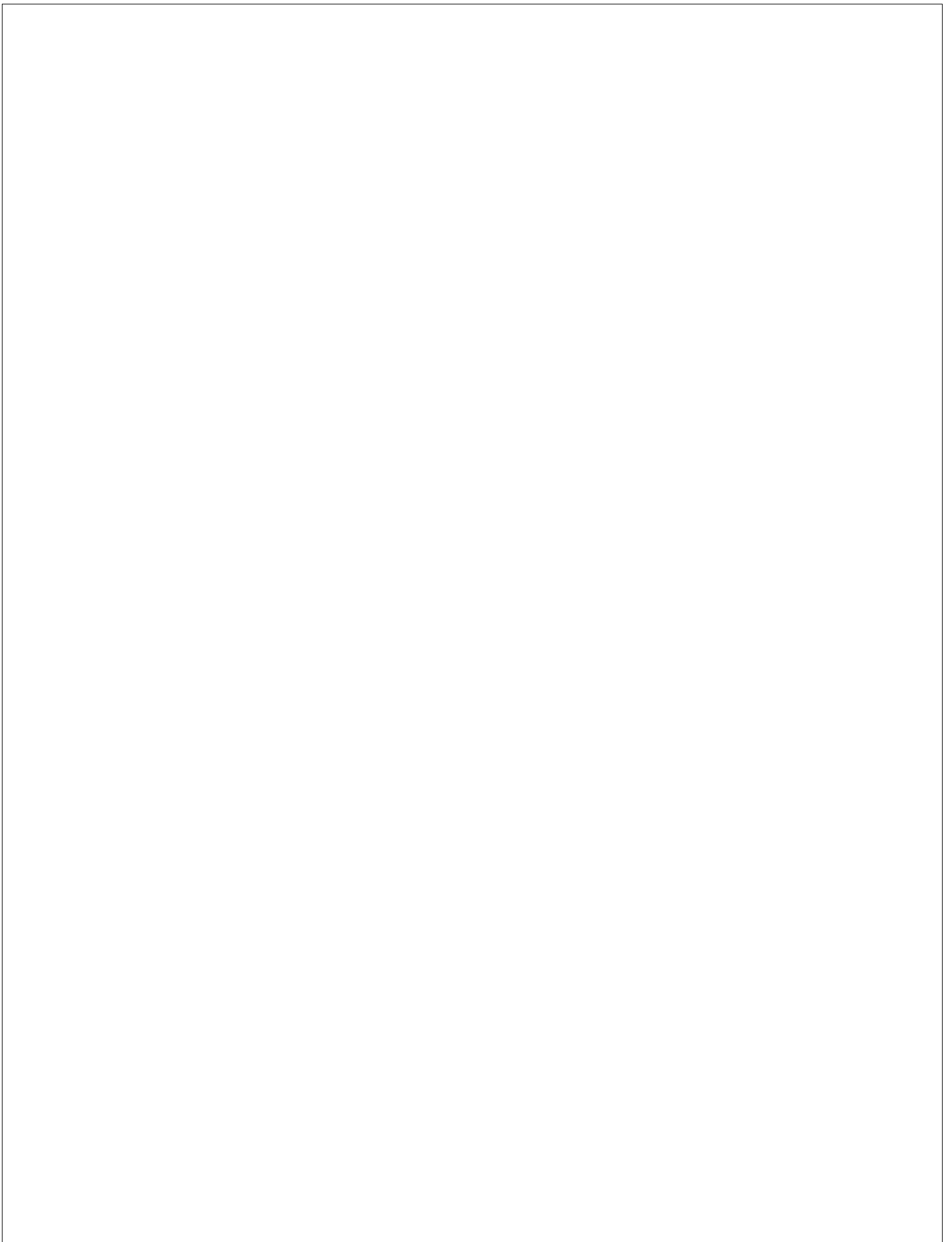


Requirements for Third-party SEMS Auditing and Certification of Deepwater Operations

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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 Center for Offshore Safety (COS)-accredited Audit Service Providers (ASPs) providing audit and certification of SEMS (safety and environmental management systems) to the requirements of API RP 75 and 30 CFR Part 250, Subpart S. It is applicable to SEMS certification of a COS member company's SEMS program(s) based on a sampling of implementation at deepwater facilities. These requirements are not intended for use outside U.S. Gulf of Mexico deepwater operations.

Requirements specified herein are in addition to those required by the most current editions of ISO 17021 and ISO 19011.

2. Acronyms

- 2.1 **API** – American Petroleum Institute
- 2.2 **ASP** – Audit Service Provider
- 2.3 **COS** – Center for Offshore Safety
- 2.4 **CFR** – Code of Federal Regulations
- 2.5 **ISO** – International Organization for Standardization
- 2.6 **OHSAS** – Occupational Health and Safety Assessment Series
- 2.7 **RP** – Recommended Practice
- 2.8 **SEMS** – Safety and Environmental Management System

3. Definitions

- 3.1 **Auditor** – person with the demonstrated personal attributes and competence consistent with the requirements of COS-2-01, COS-2-02 and ISO 19011.
- 3.2 **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.
- 3.3 **Audit Result** – a nonconformity, concern or an opportunity for improvement.
 - 3.3.1 **Nonconformity** – less than satisfactory fulfillment of a requirement.

- 3.3.2 Concern** – a condition that marginally meets requirements but could lead to a nonconformity if sufficient controls are not in place to maintain the management system.
- 3.3.3 Opportunity for improvement** – a condition that meets requirements, but based on auditor experience and knowledge, can be more effectively implemented using a modified approach or using good practices.
- 3.4 COS SEMS Certificate** – a document issued to a 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.
- 3.5 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.
- 3.6 Deepwater** – water depth of 1000 feet or greater.
- 3.7 Headquarters** – COS member company location that has overall management and control of its SEMS.

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-1-01:** *COS SEMS RP 75 Audit Protocol*
 - **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 Audit Team Leads Performing Third-party SEMS Audits of Deepwater Operations*
 - **COS-2-03-A:** COS Standard Audit Report Template
 - **COS-2-03-B:** COS Standard Audit Report without protocol questions
 - **ISO/IEC 17021:** *Conformity Assessments – Requirements for bodies providing audit and certification of management systems*
 - **ISO 19011:** *Guidelines for auditing management systems*
- 4.2** The following documents contain useful general information.

- **API RP 75:** *Recommended Practice for Development of Safety and Environmental Management Program for Offshore Operations and Facilities*
- **COS-2-03-C:** *COS Standard Audit Report with all protocol questions*
- **COS-2-04:** *Requirements for Accreditation of Audit Service Providers Performing Third-party SEMS Audit of Deepwater Operations*
- **30 CFR Part 250, Subpart S:** *Oil and Gas and Sulphur Operations in the Outer Continental Shelf – Safety and Environmental Management Systems*

5. Confidentiality of Information

A COS-accredited 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 perform audits and certification activities following applicable requirements of the most current editions of ISO/IEC 17021, ISO 19011 and this document. ISO 17021, Sections 8.6.3 (Notice of changes by a client), 9.1.1 (Audit programme), 9.1.5 (Multi-site sampling), 9.2.3.1 (Stage 1 audit), 9.3 (Surveillance activities), 9.4 (Recertification) and 9.6 (Suspending, withdrawing or reducing scope of certification) shall not apply.
- 6.2** The ASP shall document its processes for providing audit and certification activities and maintain documented evidence to demonstrate conformance to the requirements specified herein.
- 6.3** The ASP shall execute a written contract with the COS member company.
- 6.4** The issue date of the certificate shall not be before the date the certification decision was made.
- 6.5** An audit shall include the Headquarters, any locations that manage or control the SEMS, and at least 15% of the deepwater facilities covered under the scope of the SEMS.
- 6.6** All locations and deepwater facilities within the audit sample (as indicated in 6.5) shall be audited within a six (6) month period.

7. Certification Document

- 7.1** The ASP shall issue a COS-provided certificate to the COS member company that shows the certificate issue date.
- 7.2** The ASP shall not issue any certificates other than the one provided by the COS. This shall not preclude the ASP from issuing other management system certificates to the COS member company, such as ISO 9001, ISO 14001, OHSAS 18001, or other non-related COS certificates.
- 7.3** The COS-provided certificates shall remain the property of the COS and may not be altered by the ASP or COS member company once issued.

8. Certification Process Requirements

- 8.1** As part of the COS SEMS certification audit process, the ASP shall ensure that the COS member company is aware of and understands the COS requirements for achieving certification.
- 8.2** The certification audit shall be a comprehensive audit of all SEMS elements and it shall cover the Headquarters, any locations that manage or control the SEMS, and at least 15% of the deepwater facilities covered under the scope of the SEMS.
- 8.3** Based on analysis of results of the SEMS audit, the ASP shall determine if a certificate can be issued, or if additional action is required.

9. Audit Process Requirements

9.1 Audit Team

- 9.1.1** The ASP shall appoint an Audit Team that meets the qualification requirements specified in COS-2-01.
- 9.1.2** The audit team shall consist of a minimum of three auditors; one of the auditors shall be designated as the Audit Team Lead. The team may be supported by subject matter experts, if needed.
- 9.1.3** The Audit Team shall verify the conformance of the SEMS to the requirements of API RP 75 and 30 CFR Part 250, Subpart S.
- 9.1.4** The Audit Team shall be required to use COS-1-01 during the conduct of the audit.

9.2 Audit Scope

- 9.2.1** Information required from the COS member company shall include the location of and activities performed at the COS member company

Headquarters and deepwater facilities, and operations covered under the SEMS to be certified.

9.2.2 Audits of the COS member company Headquarters shall include the function or department that has the overall responsibility for the SEMS.

9.2.3 The audit criteria shall be the requirements of API RP 75, 30 CFR Part 250, Subpart S, and applicable COS program requirements.

9.3 Audit Duration

9.3.1 The ASP shall have a documented process for determining the audit duration. This process shall be verified during COS assessments.

9.3.2 Determination of the audit duration shall be, minimally, based on the following factors:

9.3.2.1 Size and composition of the audit team

9.3.2.2 Complexity of the operations' scope and activities being performed at Headquarters and the facilities

9.3.2.3 Operational status of the facilities at the time of the audit

9.3.2.4 Offshore facilities' staffing

9.3.2.5 Type of operations and equipment

9.3.2.6 Number of personnel and contractors at the facilities

9.3.3 Any changes to the process specified in 9.3.2 shall be approved by the COS before implementation.

9.3.4 The basis for determining audit duration and audit composition shall be documented and records maintained.

9.4 Audit Planning

The ASP shall provide the COS member company a copy of the Audit Plan at least 45 days before the scheduled audit.

9.5 Audit Execution

The ASP shall perform audits following applicable requirements of ISO 17021 and ISO 19011.

9.6 Audit Reporting

- 9.6.1** The ASP shall document audit results and these shall be maintained as audit records. Audit nonconformities shall be summarized using COS-2-03-A and COS-2-03-B.
- 9.6.2** Audit documents and records shall include, at a minimum, the results of the audit and the identified nonconformities consistent with the information indicated in the completed COS-1-01.
- 9.6.3** The audit records shall include a copy of the completed COS-1-01.
- 9.6.4** The following records shall be maintained for a minimum of four (4) years: the Audit Plan, the completed COS-1-01, and the Audit Report, including the COS-2-03-A and COS-2-03-B.
- 9.6.5** The ASP shall provide a copy of the COS-2-03-A and COS-2-03-B to the COS member company and others as determined by the COS member company. This report shall be provided within 30 days of the completion of the last audit close-out meeting.
 - 9.6.5.1** The last audit close-out meeting is defined as the final close out meeting at the conclusion of auditing the headquarters and facilities as required in 8.2.
 - 9.6.5.2** Typically, the last audit close-out meeting is performed at the COS member company's headquarters.

9.7 Audit Results

- 9.7.1** The Audit Team shall document all audit results and good practices.
- 9.7.2** The ASP shall require the COS member company to respond to nonconformities in writing.
- 9.7.3** Audit results identified as concerns shall be followed up during any subsequent audits to ensure that they have not resulted in a nonconformity.

9.8 Requirements for Nonconformities and Corrective Actions

- 9.8.1** The ASP shall have a documented process and defined competencies of personnel who are responsible for verifying that corrective actions have appropriately addressed identified nonconformances.
- 9.8.2** Any subsequent audits shall include a verification of implementation of corrective actions and corrective action plans to address any identified audit nonconformities.

9.9 Disputes and Resolution

9.9.1 COS member company disputes concerning COS SEMS certification audit results and certification decisions shall first be discussed with the Audit Team Lead. If they cannot be resolved at this level, disputes shall be elevated to the ASP.

9.9.2 The ASP shall address COS member company's disputes that cannot be resolved with the Audit Team Lead following the ASP's documented process for disputes and appeals, which shall be agreed to in writing prior to commencing the audit.

10. Certificate Issue

The ASP shall not issue the certificate until the COS member company has implemented corrective actions to address nonconformities identified during the audit, and the ASP has verified that corrective actions have appropriately addressed identified nonconformances, (see 9.8).

11. Complaints

The ASP shall report to the COS member company any complaints on safety and environmental operations received against the certified COS member company.