

COS-1-09

GUIDANCE FOR CONDUCTING SEMS AUDITS

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FOR API RECOMMENDED PRACTICE 75 3RD EDITION



**SEMS AUDIT &
CERTIFICATES**



**DATA COLLECTION,
ANALYSIS & REPORTING**



**GOOD PRACTICE
DEVELOPMENT**



**SHARING INDUSTRY
KNOWLEDGE**

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1. SCOPE

BSEE requires an operator's Safety and Environmental Management System (SEMS) be audited at least once every 3 years. Periodic SEMS audits help determine if the SEMS has been established, implemented, and maintained, and is effective in achieving the desired results. These SEMS audits may also provide information to management to drive continual improvement.

Input from a variety of stakeholders was important in developing this guidance, including Audit Service Providers (ASP), U.S. Bureau of Safety and Environmental Enforcement (BSEE), and the companies being audited. This Center for Offshore Safety (COS) document provides guidance for conducting SEMS audits that evaluate conformance with the SEMS requirements, and meets the requirements of the COS Certificate process (COS-2-05 *Requirements for COS SEMS Certificates*).

2. ACRONYMS

- **API** - American Petroleum Institute
- **ASP** - Audit Service Provider
- **BSEE** - Bureau of Safety and Environmental Enforcement
- **COS** - Center for Offshore Safety
- **OCS** - Outer Continental Shelf
- **SEMS** - Safety and Environmental Management Systems
- **SWA** - Stop Work Authority
- **UWA** - Ultimate Work Authority

3. DEFINITIONS

- **Audit Results** - A nonconformity, concern, or an opportunity for improvement.
- **Audit Service Provider** - Independent third-party organization accredited by COS to conduct SEMS audits.
- **Auditor** - Qualified person who is part of an audit team, who meets the requirements of Section 8.2 or Section 8.3 of COS-2-01, and is under the approval, support, and control of an Audit Service Provider when conducting an audit.
- **Company** - An operator or contractor or partnership engaged in offshore operations.
- **Compliance** - Act or process of meeting or exceeding regulatory and/or external requirements.
- **Component** - A policy, standard, practice, process, procedure, or control.

- **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.
- **Conclusion** - A subjective assessment of the state of the Establishment, Implementation, and Maintenance of the management system based on identified Conformities and Deficiencies.
- **Conformity** - Meets or exceeds the management system element or its components.
- **Corrective Action Plan** - The written record of corrections and corrective actions associated with identified Deficiencies, as well those already completed at the time of developing the CAP.
- **Critical Equipment** - Equipment and other systems determined to be essential in preventing the occurrence of or mitigating the consequences of an uncontrolled release. Such equipment may include vessels, machinery, piping, blowout preventers, wellheads and related valving, flares, alarms, interlocks, fire protection equipment and other monitoring, control, and response systems.
- **Deficiency** - Shortcomings or points of weakness or vulnerability that threaten the success of the management system. BSEE considers deficiencies to encompass both Nonconformities and Concerns as defined in COS-2-03 Section 3.3. BSEE considers Concerns to be deficiencies because the auditor has concluded that additional or modified controls must be put in place to maintain the effectiveness of the management system or one of its elements and to avoid the manifestation of new nonconformities.
- **Effective** - The extent to which the management system or an element achieves the desired result as defined by the management system.
- **Element** - A portion of a management system designed to accomplish a specific strategic objective. An element is typically composed of multiple Components.
- **Established** - Management system or Component is in place and, if required by regulation or by the organization, documented.
- **Finding** - All of the information recorded by the auditor pursuant to COS-2-03 Sections 9.6 (Audit Reporting) and 9.7 (Audit Results). This information includes Audit Results, as defined in COS-2-03 Section 3.3 (Nonconformities, Concerns, and Opportunities for Improvement) and Good Practices (see COS-02-03 Section 9.7.1).
- **Good Practices** - Include areas of conformance as well as program strengths (e.g., an aspect of a management system that an auditor believes is being implemented exceptionally well).
- **Hazard Analysis** - The application of one or more methodologies that aid in identifying and evaluating hazards.
- **Human Factors** - The interaction and application of scientific knowledge about people, facilities, and management systems to improve their interaction in the workplace and reduce the likelihood and/or consequences of human error.
- **Implemented** - Management system or component is put into effect or action.
- **Maintained** - Management system or component continues to work as designed, is checked, and corrections or adjustments are made, if required.
- **Observation** - The factual support underlying every Audit Finding. Observations may include a listing of, or excerpts from, documents reviewed, descriptions of activities witnessed, and/or documentation of personnel interviews.

- **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.
- **Procedure** - Approved and documented instructions about a specific task or activity that is used to enable the safe and consistent execution of that task or activity.
- **Process Safety** - A disciplined framework for managing the integrity of operating systems and processes that handle hazardous substances. It relies on good design principles, engineering, and operating and maintenance practices. It deals with the prevention and control of events that have the potential to release hazardous materials and energy.
- **Safe Work Practices** - Documented requirements for performing a specific type of work that helps minimize the potential harm to people, the environment, and property.
- **Stop Work Authority** - A program that provides all operator and contractor/service personnel, directly or indirectly involved with the operation, the responsibility and authority to cease work until a review of the activity can be concluded, and it has been found safe to resume such activity.
- **Systematic** - (1) Carried out using step-by-step procedures, or (2) of, characterized, or constituting a system. It typically describes carefully planned processes that unfold gradually.
- **Verify** - To establish the truth, accuracy, or reality.
- **Ultimate Work Authority** - The person or position located on the facility with the responsibility for making final decisions in any given situation.

4. INTRODUCTION

The SEMS regulations are designed to help promote the systematic management of offshore operations with the ultimate goal being safe and environmentally sound performance. SEMS audits provide periodic verification of a company's management system in support of these overarching goals by assessing and validating that the management system adequately meets the SEMS requirements. These audits are comprehensive system reviews that focus on a company's ability to operate in a safe and environmentally sound manner.

This document provides guidance on the approach and type of information that may be required to assess and validate a company's management system relative to the SEMS requirements which are found in the American Petroleum Institute Recommended Practice 75, 3rd edition¹. The ASP should incorporate this guidance into their approach, and auditees may find it valuable to better understand the process of management systems auditing. Other SEMS auditing tools, such as the COS SEMS Audit Checklist, can be used to support a comprehensive system audit. This guidance supports the delivery of the requirements of COS-2-03 *Requirements of Third-Party SEMS Auditing and Certification of Deepwater Operations*².

¹API RP 75, 3rd edition is incorporated by reference under 30 CFR 250.198.

²COS-2-03, 1st edition is incorporated by reference under 30 CFR 250.198.

5. CONTEXT

Auditing approaches are highly dependent on the type and scope of audit. A system audit is intended to be a holistic review of the system and its elements and how the company is evaluating effectiveness. While a system audit may use compliance findings as evidence, it is focused on systematic aspects that promote and assure performance as intended. Conversely, a compliance audit is generally intended to check adherence to specific internal or external requirements. A company's management system should include both system and compliance audits to reduce risk and increase confidence that a management system is operating as designed and is meeting regulatory and company requirements.

Management System Audit

A management system audit is an evaluation of the design, implementation, maintenance, and performance of a management system, and is insightful whether conducted internally or by a third party. It evaluates the adequacy and effectiveness of the system and its elements to deliver the desired results. A management system audit is performance-based, seeks to identify system gaps, and, in the case of SEMS, is generally conducted at least every 3 years.

Reports of management system audits should discuss both conformities and deficiencies and be supported by observations. A management system audit may also identify strengths, which could also be incorporated into the report. The results of the management system audit should validate execution and drive systematic improvements, if needed, to help improve overall performance.

Compliance Audit

A compliance audit is an audit focused on verifying compliance with specific requirements, and reports identify specific deficiencies. These audits are often conducted more frequently than system audits and can vary widely in scope (e.g., time frame, regulatory and/or internal requirements, specific programs or facilities). Corrective action is focused on remedying the deficiencies.

6. GUIDANCE

COS provides the following guidance for ASP and companies planning and performing a SEMS audit. The guidance is based on a management system audit approach covering each element in the management system. However, it is recognized that the elements within the management system are not independent from each other. The requirements in one element may depend on, or trigger the delivery of, requirements in another element in order to be effective. The inter-relationship of the SEMS Elements is part of the evaluation of the effectiveness of the SEMS.

This guidance uses the following step-by-step series of verifications to address the ability of each element, and the components within the element, to deliver the desired results:

1. Verify, through observations, that a component(s) has been established to meet or exceed requirements.
2. Verify, through observations, that a component(s) has been established, implemented, and maintained to assign accountability and responsibility for the component(s).
3. Verify, through observations, that a component(s) has been established, implemented, and maintained to determine the necessary skills and knowledge of those assigned accountability and responsibility.
4. Verify, through observations, that the component(s) has been implemented and maintained.
5. Verify, through observations, that the organization is evaluating the effectiveness of the component(s).

These verification steps should prompt discussion between the ASP and companies being audited as to the types of information that may be requested and reviewed during a SEMS audit. This information will form the basis for the observations and conclusions that the ASP provides in the audit report, and aid in understanding the maturity of the company's SEMS.

As a SEMS audit is a management system audit, it is also important to note that ASP should not:

- extend the audit beyond the defined scope;
- rely wholly on a compliance checklist and/or inspection approach; and
- include criteria beyond those already set by regulations and the company's management system (e.g., the requirements of 30 CFR 250, Subpart S in the case of a BSEE SEMS audit).

Guidance for each SEMS element is organized as follows:

1. Intent: A short description of the intent of the element, based on information in API RP 75 (3rd Ed.)
2. Audit Objectives: Reiteration that the objective is to verify that the management system element has been established, implemented, maintained, and is effective in meeting element requirements.
3. Key Verifications: A list of key areas to be verified through evaluation (e.g., Verify that a component(s) has been established for managing permanent and temporary changes to equipment, operating procedures, personnel, materials, and operating conditions.)

Guidance addressing SEMS Element 1 General has been presented in 3 separate sections below:

- SEMS Development, Communication, Implementation, Maintenance, and Performance
- SEMS Objectives, Goals, and Performance Measures
- Standards and Government Regulations

A separate section called Contractor Interfaces was created to address references to contractors which are found within several elements of API RP 75 and 30 CFR 250 Subpart S. Any identified conformities and deficiencies should be documented within the appropriate SEMS Elements.

In addition to the 13 elements included in API RP 75, 3rd edition and the Contractor Interfaces Element, this document includes guidance for auditing four additional elements that are specific to the BSEE SEMS regulation. These four are Stop Work Authority, Ultimate Work Authority, Employee Participation Program, and Reporting Unsafe Working Conditions³.

The order an ASP audits individual SEMS Elements is a matter of scope as determined by the audit plan. Many of the SEMS Elements are interrelated and may lend themselves to being grouped or returning to one after consideration of another.

ELEMENT 1a: SEMS DEVELOPMENT, COMMUNICATION, IMPLEMENTATION, MAINTENANCE, AND PERFORMANCE

1. Intent: The organization's management has developed, communicated, implemented, and maintained a safety and environmental management system and regularly reviews its suitability, adequacy, and effectiveness to continuously improve the system.
2. Audit Objectives: Verify that the safety and environmental management system has been established, implemented, maintained, and is effective in meeting element requirements.
3. Key Verifications:
 - a. Verify that the management system has been established.
 - b. Verify that a component(s) has been established, implemented, and maintained to assign accountability and responsibility for the management system.
 - c. Verify that a component(s) has been established, implemented, and maintained to determine the skills and knowledge of those assigned accountability and responsibility for the management system.
 - d. Verify that the management system has been communicated, implemented, and maintained.
 - e. Verify that a component(s) has been established and implemented to regularly review the management system's suitability, adequacy, and effectiveness to continually improve the system.

³These elements were written into the SEMS II regulation which was published in the federal register on April 5, 2013.

ELEMENT 1b: SEMS OBJECTIVES, GOALS, AND PERFORMANCE MEASURES

1. Intent: The organization's management develops, assesses, and uses management system objectives, goals, and performance measures to continuously improve the system.
2. Audit Objectives: Verify that a component(s) has been established, implemented, maintained, and is effective in meeting the element requirements.
3. Key Verifications:
 - a. Verify that a component(s) has been established for safety and environmental objectives, goals, and performance measures.
 - b. Verify that a component(s) has been established, implemented, and maintained to assign accountability and responsibility for the component(s) identified in (a).
 - c. Verify that a component(s) has been established, implemented, and maintained to determine the skills and knowledge of those identified in (b).
 - d. Verify that the component(s) identified in (a) have been implemented and maintained.
 - e. Verify that the organization is evaluating the effectiveness of the component(s).

ELEMENT 1c: STANDARDS AND GOVERNMENT REGULATIONS

1. Intent: The organization's management identifies, monitors, and provides access to standards and government regulations applicable to its offshore facilities and operations.
2. Audit Objectives: Verify that a component(s) has been established, implemented, maintained, and is effective in meeting element requirements.
3. Key Verifications:
 - a. Verify that a component(s) has been established to identify, monitor, and provide access to standards and government regulations applicable to its facilities and operations.
 - b. Verify that a component(s) has been established, implemented, and maintained to assign accountability and responsibility for the component(s) identified in (a).
 - c. Verify that a component(s) has been established, implemented, and maintained to determine the skills and knowledge of those identified in (b).
 - d. Verify that the component(s) identified in (a) has been implemented and maintained.
 - e. Verify that the organization is evaluating the effectiveness of the component(s).

ELEMENT 2: SAFETY AND ENVIRONMENTAL INFORMATION

1. Intent: The organization develops and maintains the Safety and Environmental information for process safety and mechanical and facilities/equipment design. The organization uses safety and environmental information in implementing the SEMS Elements.
2. Audit Objectives: Verify that a component(s) has been established, implemented, maintained, and is effective in meeting the element requirements.
3. Key Verifications:
 - a. Verify that a component(s) has been established to develop and maintain the safety and environmental information, including operating limits, for process safety and mechanical and facilities/equipment design.
 - b. Verify that a component(s) has been established that requires facilities and equipment designs are in accordance with generally accepted engineering practices and applicable regulatory requirements.
 - c. Verify that the safety and environmental information is used as the basis for implementing all SEMS elements.
 - d. Verify that a component(s) has been established to assign accountability and responsibility for the components identified in (a) and (b).
 - e. Verify that a component(s) has been established to determine the necessary skills and knowledge of those identified in (d).
 - f. Verify that the component(s) identified in (a) and (b) are implemented and maintained.
 - g. Verify that the organization is evaluating the effectiveness of the component(s).

ELEMENT 3: HAZARD ANALYSES

1. Intent: The organization develops and implements hazards analyses for all facilities and task level hazards analyses.
2. Audit Objectives: Verify that a component(s) has been established, implemented, maintained, and is effective in meeting the element requirements.
3. Key Verifications:
 - a. Verify that a component(s) has been established for hazards analyses for all facilities that defines the methodology to be used and when to apply.
 - i. Verify that the results of facility hazard analyses have been documented and actions taken as appropriate.
 - b. Verify that a component(s) has been established for task level hazards analyses, including safety and environmental aspects, mitigation of risks, and when to apply.
 - c. Verify that a component(s) has been established to assign accountability and responsibility for the components identified in (a) and (b).
 - d. Verify that a component(s) has been established to determine the necessary skills and knowledge of those identified in (c).

- e. Verify that the component(s) in (a) and (b) are implemented and maintained.
- f. Verify that the organization is evaluating the effectiveness of the component(s).

ELEMENT 4: MANAGEMENT OF CHANGE

1. Intent: The organization develops and implements a component(s) that manages permanent and temporary changes to equipment, operating procedures, personnel, materials, and operating conditions.
2. Audit Objectives: Verify that a component(s) has been established, implemented, maintained, and is effective in meeting the element requirements.
3. Key Verifications:
 - a. Verify that a component(s) has been established for managing permanent and temporary changes to equipment, operating procedures, personnel, materials, and operating conditions (e.g. pressures, temperatures, flow rates, process conditions different from those in the original process or mechanical design).
 - i. Verify that the component(s) in (a) defines what initiates a management of change.
 - ii. Verify that those whose job tasks will be affected by a change in the operation are informed of and trained in the change prior to startup of the process or affected part of the operation.
 - iii. Verify that management of change reviews and approvals occur prior to implementation.
 - b. Verify that a component(s) has been established to assign accountability and responsibility for the components identified in (a).
 - c. Verify that a component(s) has been established to determine the skills and knowledge of those identified in (b).
 - d. Verify that the component(s) identified in (a) are implemented and maintained.
 - e. Verify that the organization is evaluating the effectiveness of the component(s).

ELEMENT 5: OPERATING PROCEDURES

1. Intent: The organization develops and implements operating procedures for conducting safe and environmentally sound operations.
2. Audit Objectives: Verify that a component(s) has been established, implemented, maintained, and is effective in meeting the element requirements.
3. Key Verifications:
 - a. Verify that a component(s) has been established for the development and implementation of operating procedures for operations addressed in the management system.
 - i. Verify that current operating procedures are accessible to the personnel involved in related operations.
 - ii. Verify that periodic reviews of operating procedure(s) occurred and are documented.

- b. Verify that a component(s) has been established, implemented, and maintained to assign accountability and responsibility for the components identified in (a).
- c. Verify that a component(s) has been established, implemented, and maintained to determine the skills and knowledge of those identified in (b).
- d. Verify that the component(s) identified in (a) is implemented and maintained.
- e. Verify that the organization is evaluating the effectiveness of the component(s).

ELEMENT 6: SAFE WORK PRACTICES

- 1. Intent: The organization develops and implements safe work practices designed to minimize the risks associated with operating, maintenance, and modification activities and the handling of materials and substances that could affect safety or the environment.
- 2. Audit Objectives: Verify that a component(s) has been established, implemented, maintained, and is effective in meeting the element requirements.
- 3. Key Verifications:
 - a. Verify that a component(s) has been established for developing and implementing documented safe work practices for all applicable activities addressed in the management system.
 - i. Verify that the safe work practices include a work authorization or permit to work system.
 - ii. Verify that the safe work practices include control of hazardous materials.
 - b. Verify that a component(s) has been established, implemented, and maintained to assign accountability and responsibility for the component(s) identified in (a).
 - c. Verify that a component(s) has been established, implemented, and maintained to determine the skills and knowledge of those identified in (b).
 - d. Verify that the component(s) are implemented and maintained.
 - e. Verify that the organization is evaluating the effectiveness of the component(s).

ELEMENT 7: TRAINING

- 1. Intent: The organization establishes and implements a training program so that all personnel are trained in accordance with their duties and responsibilities to work in a safe and environmentally sound manner.
- 2. Audit Objectives: Verify that a component(s) has been established, implemented, and maintained, and is effective in meeting the element requirements.
- 3. Key Verifications:
 - a. Verify that a component(s) has been established for defining what training is required for all personnel.
 - b. Verify that a component(s) has been established to ensure personnel possess the required knowledge and skills to carry out their duties and responsibilities.

- c. Verify that a component(s) has been established to assign accountability and responsibility for the components identified in (a) and (b).
- d. Verify that a component(s) has been established to determine the skills and knowledge of those identified in (c).
- e. Verify that the component(s) are implemented and maintained.
- f. Verify that the organization is evaluating the effectiveness of the component(s).

ELEMENT 8: ASSURANCE OF QUALITY AND MECHANICAL INTEGRITY OF CRITICAL EQUIPMENT

- 1. Intent: The organization establishes and implements component(s) so that critical equipment for a facility is identified, designed, installed, tested, inspected, and maintained in a way that it remains reliable and fit for service.
- 2. Audit Objectives: Verify that a component(s) has been established, implemented, maintained, and is effective in meeting element requirements.
- 3. Key Verifications:
 - a. Verify that a component(s) has been established to define and identify critical equipment.
 - b. Verify that a component(s) has been established to test, inspect, and maintain identified critical equipment so that it remains fit for service.
 - c. Verify that a component(s) has been established to review and approve deviations from the regular testing, inspection, and maintenance procedures.
 - d. Verify that a component(s) has been established, implemented, and maintained to assign accountability and responsibility for the component(s) identified in (a), (b) and (c).
 - e. Verify that a component(s) has been established, implemented, and maintained to determine the necessary skills and knowledge of those identified in (d).
 - f. Verify that the component(s) are implemented and maintained.
 - g. Verify that the organization is evaluating the effectiveness of the component(s).

ELEMENT 9: PRE-STARTUP SAFETY REVIEW

- 1. Intent: The organization establishes and implements component(s) so that pre-startup safety and environmental reviews occur for new and significantly modified facilities.
- 2. Audit Objectives: Verify that a component(s) has been established, implemented, maintained, and is effective in meeting the element requirements.
- 3. Key Verifications:
 - a. Verify that a component(s) has been established so that pre-startup safety and environmental reviews occur for new and significantly modified facilities.

- b. Verify that a component(s) has been established, implemented, and maintained to assign accountability and responsibility for the components identified in (a).
- c. Verify that a component(s) has been established, implemented, and maintained to determine the necessary skills and knowledge of those identified in (b).
- d. Verify that the component(s) are implemented and maintained.
- e. Verify that the organization is evaluating the effectiveness of the component(s).

ELEMENT 10: EMERGENCY RESPONSE AND CONTROL

- 1. Intent: The organization establishes and implements a component(s) so that emergency response and control plans are ready for immediate implementation at a facility.
- 2. Audit Objectives: Verify that a component(s) has been established, implemented, maintained, and is effective in meeting the element requirements.
- 3. Key Verifications:
 - a. Verify that a component(s) has been established so that emergency response and control plans are developed and ready for implementation at a facility.
 - b. Verify that a component(s) has been established that validates the emergency response and control plans through drills.
 - c. Verify that a component(s) has been established, implemented, and maintained to assign accountability and responsibility for the components identified in (a) and (b)
 - d. Verify that a component(s) has been established, implemented, and maintained to determine the skills and knowledge of those identified in (c).
 - e. Verify that the component(s) are implemented and maintained.
 - f. Verify that the organization is evaluating the effectiveness of the component(s).

ELEMENT 11: INVESTIGATION OF INCIDENTS

- 1. Intent: The organization establishes and implements a component(s) so that incidents with actual or potential for serious safety or environmental consequences are investigated to learn and prevent a recurrence of similar incidents.
- 2. Audit Objectives: Verify that a component(s) has been established, implemented, maintained, and is effective in meeting element requirements.
- 3. Key Verifications:
 - a. Verify that a component(s) has been established for investigating actual and potential serious safety and environmental consequence incidents and defines what incidents require investigation.
 - b. Verify that a component(s) has been established for managing corrective actions resulting from the investigation of actual and potential serious safety and environmental consequence incidents.

- c. Verify that a component(s) has been established for sharing learnings within the organization.
- d. Verify that a component(s) has been established, implemented, and maintained to assign accountability and responsibility for the component(s) identified in (a), (b), and (c).
- e. Verify that a component(s) has been established, implemented, and maintained to determine the skills and knowledge of those identified in (d).
- f. Verify that the component(s) are implemented and maintained.
- g. Verify that the organization is evaluating the effectiveness of the component(s).

ELEMENT 12: AUDIT OF SEMS ELEMENTS

- 1. Intent: The organization has established a component(s) to periodically audit the safety and environmental management system (SEMS) to determine if the system has been implemented and is achieving its desired results.
- 2. Audit Objectives: Verify that a component(s) has been established, implemented, maintained, and is effective in meeting the element requirements.
- 3. Key Verifications:
 - a. Verify that a component(s) has been established to verify conformance with SEMS requirements.
 - b. Verify that a component(s) has been established to assign accountability and responsibility for the component(s) identified in (a).
 - c. Verify that a component(s) has been established to determine the skills and knowledge of those identified in (b).
 - d. Verify that the component(s) are implemented and maintained.
 - e. Verify that the organization is evaluating the effectiveness of the component(s).

ELEMENT 13: RECORDS AND DOCUMENTATION

- 1. Intent of the SEMS Element: The organization establishes a component(s) to control its documents and records.
- 2. Audit Objectives: Verify that a component(s) has been established, implemented, maintained, and is effective in meeting the element requirements.
- 3. Key Verifications:
 - a. Verify that a component(s) has been established for document and record control.
 - b. Verify that a component(s) has been established, implemented, and maintained to assign accountability and responsibility for the components identified in (a).

- c. Verify that a component(s) has been established, implemented, and maintained to determine the necessary skills and knowledge of those identified in (b).
- d. Verify that the component(s) are implemented and maintained.
- e. Verify that the organization is evaluating the effectiveness of the component(s).

ELEMENT 14: STOP WORK AUTHORITY

1. Intent: The organization establishes a component(s) that grants all personnel the responsibility and authority to stop work when an imminent risk or danger exists.
2. Audit Objectives: Verify that a component(s) has been established, implemented, maintained, and is effective in meeting the element requirements.
3. Key Verifications:
 - a. Verify that a component(s) has been established that requires all personnel to be trained in and granted the responsibility and authority to stop work when an imminent risk or danger exists.
 - b. Verify that a component(s) has been established for the resumption of work, including the role of the Ultimate Work Authority (UWA).
 - c. Verify that a component(s) has been established to assign accountability and responsibility for the components identified in (a) and (b).
 - d. Verify that a component(s) has been established to determine the skills and knowledge of those identified in (c).
 - e. Verify that the component(s) are implemented and maintained.
 - f. Verify that the organization is evaluating the effectiveness of the component(s).

ELEMENT 15: ULTIMATE WORK AUTHORITY

1. Intent: The organization establishes, implements, and maintains a component(s) that designates, identifies, and communicates the Ultimate Work Authority to all personnel on its offshore facilities.
2. Audit Objectives: Verify that a component(s) has been established, implemented, maintained, and is effective in meeting the element requirements.
3. Key Verifications:
 - a. Verify that a component(s) has been established for identifying and communicating the Ultimate Work Authority to all personnel on its offshore facilities.
 - b. Verify that a component(s) has been established that designates the roles and tasks of the UWA.
 - c. Verify that a component(s) has been established, implemented, and maintained to assign accountability and responsibility for the components identified in (a) and (b).

- d. Verify that a component(s) has been established, implemented, and maintained for determining the skills and knowledge of those identified in (c).
- e. Verify that the component(s) are implemented and maintained.
- f. Verify that the organization is evaluating the effectiveness of the component(s).

ELEMENT 16: EMPLOYEE PARTICIPATION PROGRAM

1. Intent: The organization has established a component(s) for defining how appropriate employees will be consulted with, and participate in, the development, implementation, and maintenance of its SEMS and how these employees have access to relevant components of the SEMS.
2. Audit Objectives: Verify that a component(s) has been established, implemented, maintained, and is effective in meeting the element requirements.
3. Key Verifications:
 - a. Verify that a component(s) has been established for:
 - i. Defining and documenting how the organization consults with appropriate employees and how these employees participate in the development, implementation, and maintenance of the SEMS.
 - ii. Defining how the organization will provide its employees access to the components of the SEMS that are relevant to their job.
 - b. Verify that a component(s) has been established to assign accountability and responsibility for the components identified in (a).
 - c. Verify that a component(s) has been established to determine the skills and knowledge of those identified in (b).
 - d. Verify that the component(s) are implemented and maintained.
 - e. Verify that the organization is evaluating the effectiveness of the component(s).

ELEMENT 17: REPORTING UNSAFE WORKING CONDITIONS

1. Intent: The organization establishes a component(s) that enables all personnel to report unsafe working conditions or possible violations to BSEE.
2. Audit Objectives: Verify that a component(s) has been established, implemented, maintained, and is effective in meeting the element requirements.
3. Key Verifications:
 - a. Verify that a component(s) has been established for reporting unsafe working conditions or possible violations to BSEE.

- b. Verify that a component(s) has been established to assign accountability and responsibility for the components identified in (a).
- c. Verify that the component(s) are implemented and maintained.
- d. Verify that the organization is evaluating the effectiveness of the component(s).

NOTE : Key verification of skills and knowledge not applicable.

CONTRACTOR INTERFACES

- 1. Intent: The organization establishes a component(s) that manages the interfaces between the organization and its contractors covering contractor selection, evaluation, agreements on application of appropriate SEMS Element components, and verification of personnel skills and knowledge prior to performing a job.
- 2. Audit Objectives: Verify that a component(s) has been established, implemented, maintained and is effective in meeting multi-Element contractor interface requirements.
- 3. Key Verifications:
 - a. Verify that a component(s) has been established to:
 - i. evaluate contractor safety and environmental performance;
 - ii. document contractor selection criteria;
 - iii. document agreements between the organization and its Contractors on the application of appropriate SEMS Elements before work begins;
 - iv. familiarize contractor employees with the organization's SEMS and expectations;
 - v. inform contractor employees of any known hazards at the facility they are working on and safe work practices to control access in operation areas; and
 - vi. verify that contractor personnel have the training, skills, and knowledge prior to performing a job.
 - b. Verify that a component(s) has been established to assign accountability and responsibility for the component(s) identified in (a).
 - c. Verify that a component(s) has been established to determine the skills and knowledge of those assigned accountability and responsibility in (b).
 - d. Verify that the component(s) are implemented and maintained.
 - e. Verify that the organization is evaluating the effectiveness of the component(s).



