Management of Change (MoC) Guidance
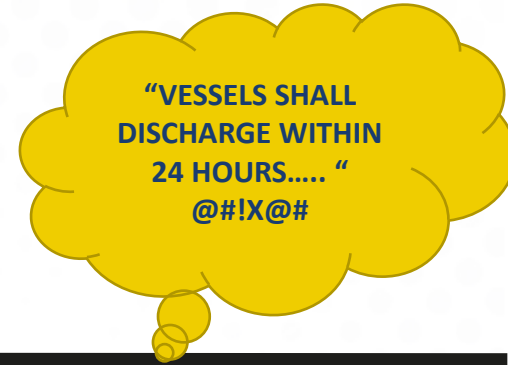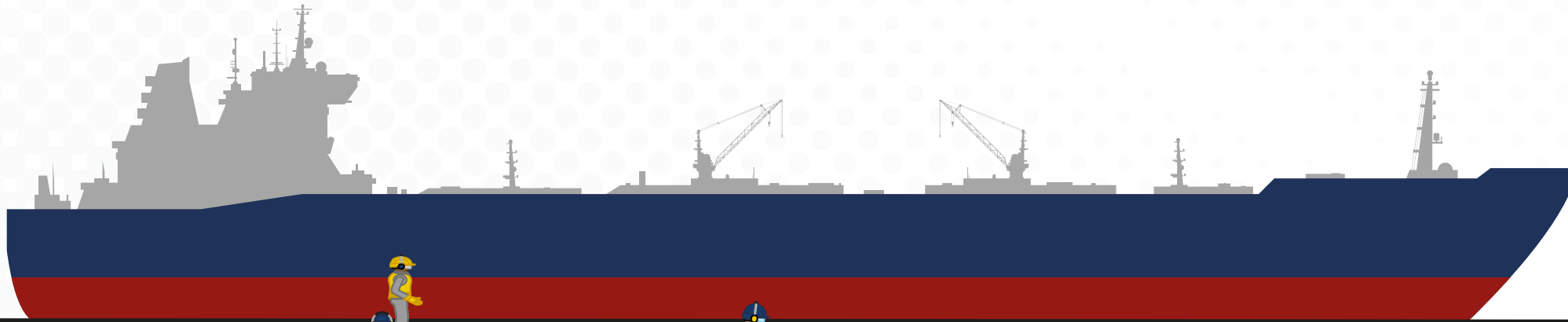
What is MoC?

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MoC = Management of Change

A systematic process in ASSESSING RISKS BEFORE CHANGES ARE IMPLEMENTED

To ensure changes do not occur without PROPER CONSIDERATION

"VESSELS SHALL DISCHARGE WITHIN 24 HOURS..... "
@#!X@#

Why "Change" Must be Managed

Poorly or unmanaged changes can result in VERY SERIOUS INCIDENTS:

- Injuries or fatalities
- Environmental damage
- Regulatory violations
- Adverse public reaction
- Business performance
- Property loss

If changes are not managed EFFECTIVELY, the RISKS of operation may INCREASE; this could result in SERIOUS CONSEQUENCES

What is Change?

An understanding of "WHAT IS CHANGE" is necessary. The following are some examples:

CHANGE IN EQUIPMENT, either fixed or mobile other than "like for like'' changes

CHANGE IN HAZARDOUS ENVIRONMENTS or personnel occupancy within existing hazardous environments

WARNING !
Examples of Change

CHANGE IN APPROVED PROCEDURES i.e., new or updated with significant differences to those previously used

CHANGES IN STAFF / PERSONNEL that conduct key or safety critical activities

MANAGEMENT OF CHANGE PROCESS


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IDENTIFY
CHANGE
MANAGEMENT
TEAM
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→

IS A RISK ASSESSMENT REQUIRED?

— YES → **ASSESS THE RISK AND ACTIONS REQUIRED FOR THE CHANGE**

NO

SITE FINAL REVIEW

HIGHER LEVEL FINAL REVIEW

SENIOR MANAGER FINAL REVIEW

CHANGE AUTHORISED

NO

YES

IMPLEMENT CHANGE

→ **TRAIN PERSONNEL**

→ **POST CHANGE REVIEW & CLOSE-OUT**

STAY SAFE
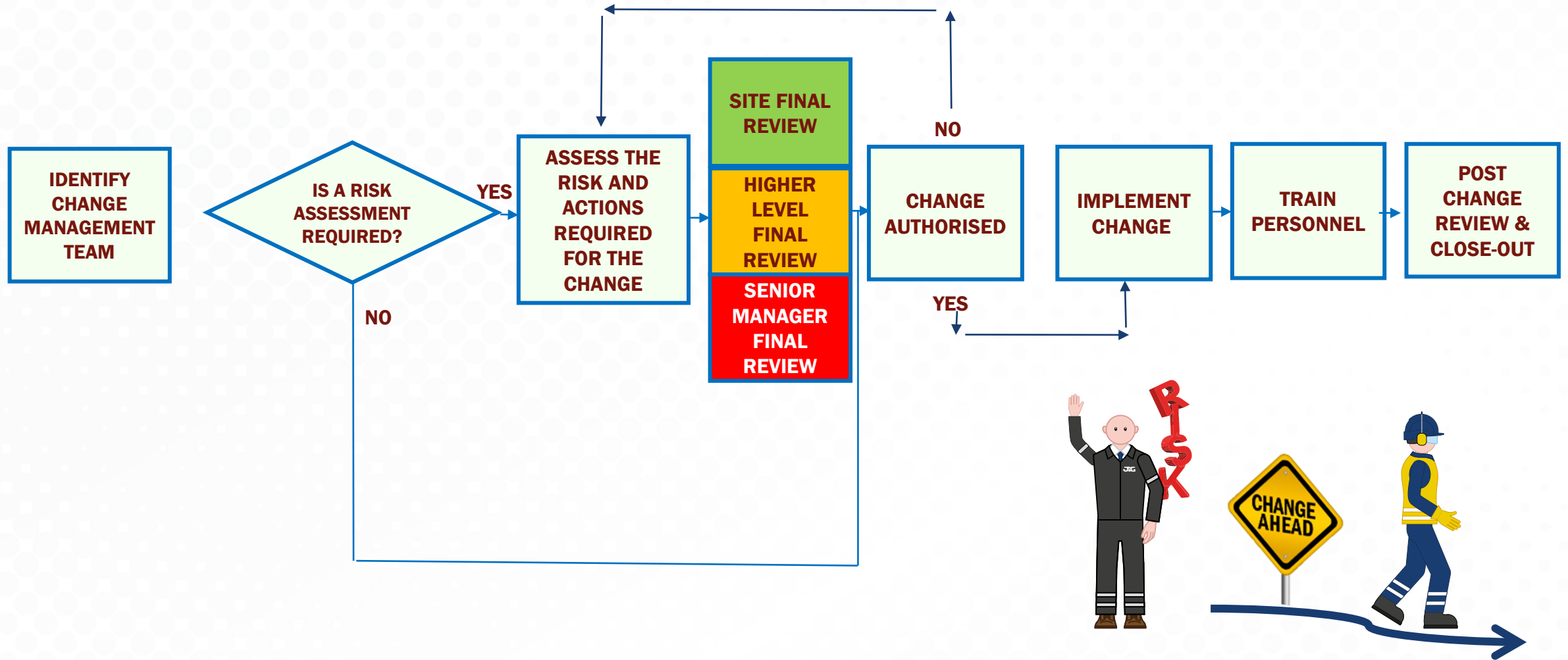
Is MOC well understood and applied?

Learning from Inspections

JITS Inspection Data 2019-2021

- Over 2000 inspections

- Circa 600 sites inspected

- 12000 recommendations

- >1% were about MOC

- >150 recommendations or comments
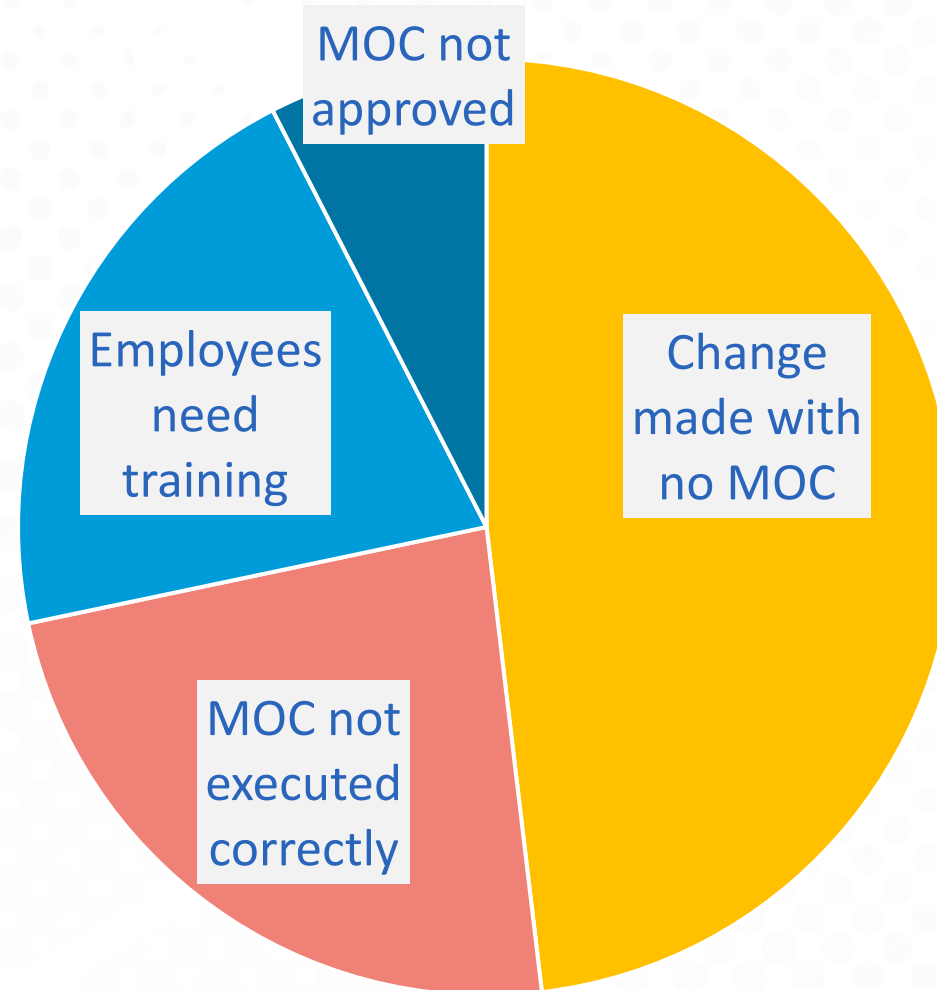
- 15 positive comments

- 135 findings on MOC or suggestion to do one

> 10% of sites inspected did not fully understand MOC

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Overview of MOC inspection findings

Pie chart segments:
- MOC not approved
- Change made with no MOC
- Employees need training
- MOC not executed correctly

Examples of Recommendations

There is no evidence that a documented MOC was developed for changes recently introduced in the facility design - such as the installation of new filter vessels. A refresher training on MOC would support re-enforcement of the MOC principles and is therefore highly recommended.

The location has completed the gap assessment towards compliance with the Standards and has identified the need for Variances. However, some Variances that could affect safety or product quality are not supported by relevant Management of Changes (MOC's) and Risk Assessments (RA's).

Although a Management of Change procedure is in place, it was noted that it is not applied. For instance, JIG Bulletin xxx has been introduced without handling it with a MoC.

Examples of Recommendations (2)

There were no MoCs logged at this location but there should have been at least one for the new equipment received in 2018. There needs to be some additional training on MoC in terms of identification of change and the use of the forms and the change log.

MoC form has some missing elements in terms of change of procedures for the change of temporary storage and as noted in earlier sections, some risk elements have not been identified and controlled with adequately documented requirements. MoC overall is assessed as low risk, but this is clearly a medium risk activity. Further review of MoC associated with temporary storage facilities in use for site refurbishment is needed to ensure completeness of the MoC and adequate control of risks.

Refresher training is required on MOC in order for everyone to understand when this needs to be put in place.

Recurring Weaknesses in Completed MOC

- Risk Assessment not done correctly on identified hazards

- Not all risks are identified

- MOC not reviewed and approved by authorised signatory

- Operators not trained or aware of MOC

- No post-operation review to ensure MOC covers all the actual risks.

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Summary

1. **What is MoC?**

   - **ASSESSING RISKS** before changes are implemented

2. **Why MoC?**

   - Poorly or unmanaged changes can result in sub-optimal performance at best and **VERY SERIOUS INCIDENTS** at worst

3. **What is "Change"?**

   - Changes in **EQUIPMENT, PROCEDURES, PERSONNEL, hazardous ENVIRONMENTS etc.**

4. **Your MoC responsibilities?**

   - **VERIFY** and **IDENTIFY** changes for the MoC process
   - **STOP** and **FOLLOW UP** these changes with your supervisor

M.O.C