



Management of Change

Purpose

The purpose of MOC is to introduce plans for making changes, controlling changes and helping people to adapt to changes in the Organization. However, prior to implementing any significant changes in the organization, it is essential to take into consideration how an adjustment or replacement will impact processes, systems and employees within the organization. Approved change requests must be communicated to the employees at the appropriate time. It is an opportunity for the Company to identify new potential risks and challenges in terms of HSE that could result from these changes. MOC must comply with regulatory compliance.

Scope:

MOC is applicable in all manufacturing units, plants, offices, R&D Centres, Warehouses, Laboratories of HSCL.

Change Management Process: (refer Appendix-1)

1. Prepare approach:
2. Manage Change:
3. Sustain outcome:

Documentation:

It is an important criterion of MOC. It is not only to maintain an audit trail should a rollback become necessary, but also to ensure compliance with internal and external controls, including regulatory compliance.

Roles and responsibilities

At Himadri Speciality Chemical Limited the following gives guidance on typical roles associated to the MOC process. Some of these roles can be combined to be performed by one person, provided at least two competent persons are involved in the MOC process. Any person who could be involved in a change shall be trained to understand what constitutes a change and how a change shall be addressed and managed.

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Initiator (Applicant)

The initiator can be any person who wishes or needs to put forward a proposal for the modification of a process. The initiator could be associated with the work area, such as an operator or instrumentation engineer, or he/she could be someone in a central operating or engineering role. The initiator of a change shall describe the reason for the change and provide sufficient information to adequately describe the change to a person not familiar with that particular situation. This can be done in an electronic/hard copy format. It is best practice that the initiator also describes the plan for implementation of the change.

HoD – Operations/Process

The HoD – Operations/Process has ultimate accountability for the process or system where the change is being proposed and for the implementation of the change. The HoD - Production has the responsibility and experience to evaluate the need of a change and decide on its technical and practical merit. They also define the required assessments to obtain technical approval. He/she has further responsibility is to decide on the readiness for implementation. In the final step of the MOC process the HoD - Production signs off the closure of the change. For many changes the HoD – Operations/Process's role may be taken by the plant or facility manager.

Technical approver(s) - Internal

The Technical approver(s) – Internal's role is to ensure and to verify that all items identified during the assessment process are in place and complete. These items may include a risk assessment, technical details of the change and supporting documents such as piping and instrumentation diagrams (P&IDs) and other drawings. It should be ensured correct risk analysis has been used and the results are valid. In some cases, this can involve the application of a check list. The assessment of change includes an analysis of the impact on safety, health, environment, reliability, security and quality and also identifies the applicable standards, local mandatory regulations, codes and laws. The role of the Technical Approver – Internal and the role of the HoD - Production can be combined in one.

Technical approver(s) - External

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Depending on the complexity of the change, a technical review (by 3rd party) of the change is conducted by one or more technical approvers in their area of competence. This (these) role(s) can be located onsite or within a central function.

Appendix-1

MOC Process Steps

AT Himadri Speciality Chemical Limited the principle for management and control of plant and equipment modification is divided into eight steps. All of these steps are generally applicable and can be used for all kinds of changes.

1. Initiation

The Initiator provides an idea on the change. They describe the reason for the change and its scope and attach supporting documents and may include an implementation plan. The application form for the change is submitted to the HoD - Production.

2. Appraisal

The HoD - Production ensures that the change is evaluated on technical, operational, safety, security, environmental, quality, regulatory and economical aspects. Depending on the complexity and level of risk identified, the HoD - Production will determine the level of technical review and risk assessment. The HoD - Production will then decide if the project needs a nominated change manager.

3. Approval

The HoD - Production together with the Technical Approver – Internal provides all change documentation to the technical approver(s). The technical approver(s) approves or rejects, with reasons, the change.

4. Implementation

After approval has been obtained, the change can be implemented under precondition that necessary resources have been made available. During the implementation phase, a modification of the original scope may be necessary or be requested. The HoD - Production is responsible to ensure the impact of this modification is reviewed and approved again before implementation. Most changes

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will require plant documentation to be updated. In some cases, this can cover a number of documents.

5. Verification

The implemented change shall be verified to ensure that it is in accordance with the requirements and objectives of the change. This may include an operational readiness.

6. Training and awareness

Ensure that affected employees and contractors are made aware of the impact of the change and, if required, training is provided prior to the restart of the changed process or closure of the MOC process.

7. Documentation

All documents concerning the change should be filed at the unit where the change is being carried out or in a central electronic system/Hard Copy accessible for all authorized/relevant personnel.

Typical documentation to be updated includes, but is not limited to:

- a) Plant documentation such as operating procedures, control logic documentation, alarm and trip schedules, drawings and manuals, pressure test certificates, cleanliness certificates, training records, maintenance procedures;
- b) Regulatory documentation and product specifications.
- c) Typical new documentation to be finalized for the change includes:
 - Purpose for the change;
 - Records of any reviews and assessments done for the change;
 - Records of the change approval which summarize the change including the completion date;
 - Possibly an electronic or paper-based register of all changes conducted at the.

8. Closure of MOC process

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All changes successfully implemented shall be closed. Prior to closure of the MOC process, a review of all important elements of the change should be carried out. This should include all open actions from the Start-up Safety Review process, document updates, risk assessments and training of personnel. The closure is normally carried out by the HoD - Production.

9. Temporary changes

Temporary changes are sometimes required because of unforeseen process deviations or equipment malfunction. They have a limited validity and at the end of the period the process or equipment shall revert to the original state or a permanent change shall be implemented. Temporary changes follow the same procedure as permanent changes.

It is good practice that companies define the maximum duration of a temporary change in their procedures. Temporary changes should be registered with all other changes of the site, but attention shall be given to not exceed the validity date of this change.

10. Emergency changes

An emergency change may be initiated on a true emergency basis if a temporary or permanent change cannot be implemented. The following situations may justify an emergency change:

- a) To correct a deficiency that would cause a hazardous condition that is an immediate
- b) To prevent an immediate environmental release.
- c) In case of jeopardy of not providing product to clients, owing to equipment failure or unforeseen design errors.

An emergency change may initially bypass the use of the written or electronic MOC process but still requires an assessment of the change.

At least two technically competent persons including one designated by senior line management shall review and verbally approve the change. The responsible person for the plant or facility or his nominated deputy should be involved in the decision. All impacted employees shall be notified. It is good practice that essential elements of the change and approval are documented in some way.

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This could be done for example by email, text message or recorded conversation and also by an entry in the shift book. Once the change is in place, it shall be validated as soon as possible.

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