Challenges whilst changing Management of Change

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Process Safety Congres, Dordrecht, 18 mei 2022

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2017 - 2022 Process Safety Manager (AkzoNobel, Nouryon, Nobian)

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1999 - 2009 Process Engineer (ICI, Huntsman)

Agenda

- Lets meet the audience
- Perspective of the presentation
- What is Management of Change ?
- Who uses Management of Change ?
- Drivers for changing Management of Change
- Pitfalls, advice & conclusion

CCPS : "*Consistent and effective Management of Change is one of the most important and difficult activities to implement in a company.*"

Changing Management of Change is not to be underestimated.

Lets meet the audience …

- Who has worked according an MoC procedure ?

- What is a typical average number of changes per year per plant ? Less than 10, 10-100, more than 100

- Who has changed an MoC System for a plant, facility and/or company?

What is Management of Change ?

A **change** is a combination of a **problem**, a **solution**, an above threshold **value** of solving the problem and the **identified risks**, all combined are **approved** for implementation. The solution can be any addition, process modification, or substitute item (e.g., person or thing) that is not a replacement-in-kind and/or design specifications. The problem or the solution (or both) may affect the safety of the people, environment, process installation etc. [*]

Management of Change is a **process** for evaluating and controlling changes to process & equipment design, operation, organisation, or activities - prior to implementation - to make certain that no new or additional hazards are introduced and that the risk of existing hazards to employees, the public, or the environment is not unknowingly increased.

MoC is not :
- financial approval system
- project / resource management
- collection box for idea / complaints / suggestion / wishes
- document update tool
- communication tool
- software package
- fool-proof, perfect

Do not include !

Define

Assess

Review

Develop

Authorise

Implement

Evaluate

[*] when in doubt, assume it's a change

MoC System

The **Management of Change System** is the complete set of requirements, procedures, instructions and tools to enable portfolio management.

All elements of the system interact directly or indirectly.

Depending on the scope of the MoC System (company, site, plant, section), the risks associated and the competences of the organisation, the level of detail will differ.
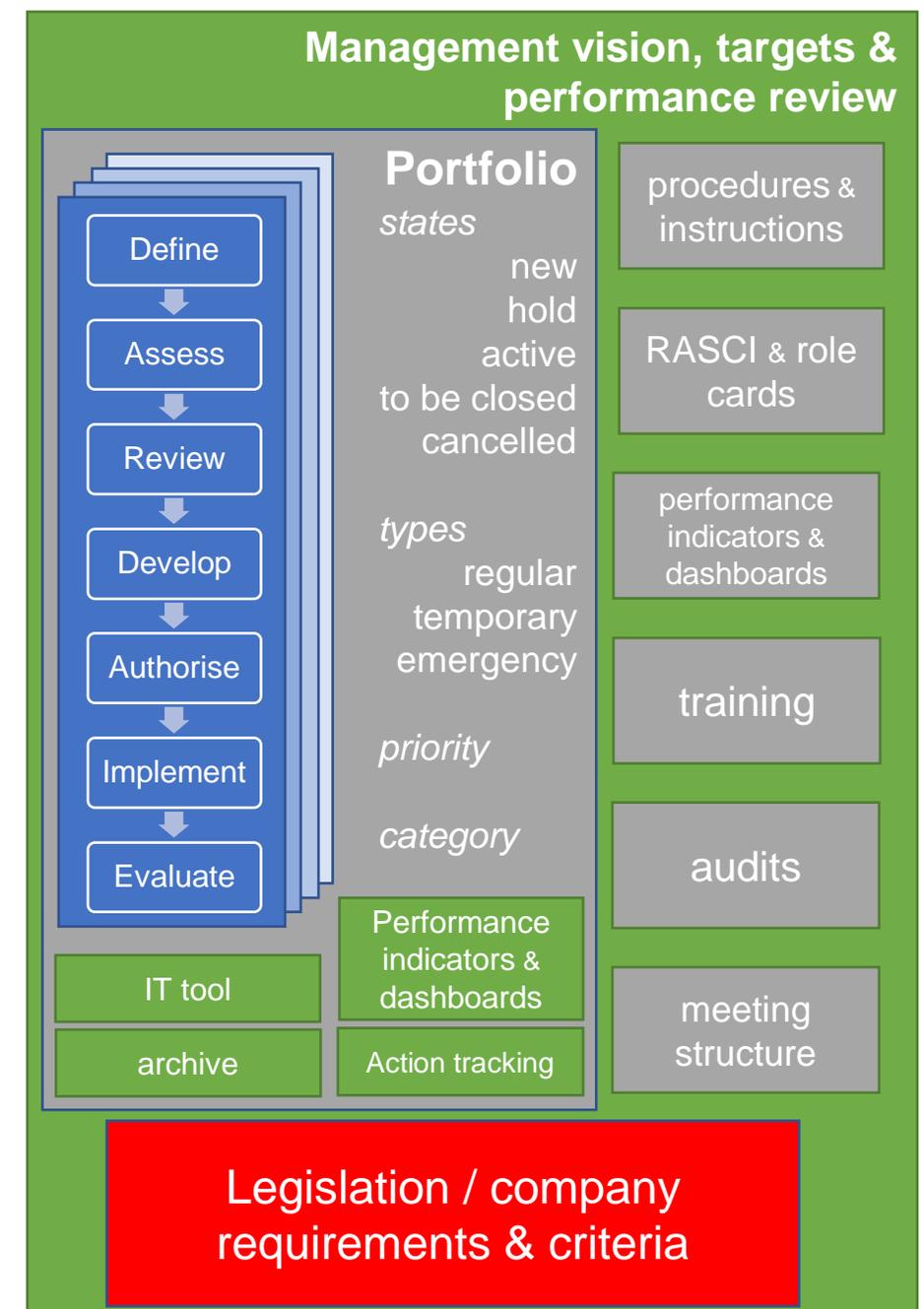
Who "uses" Management of Change

- Engineers, technologists

- Reliability & Maintenance engineers

- Operators / technicians

- Production engineers

- HSE engineers

- Project engineers/managers

- Procurement (services, goods, materials, equipment, spare parts)

- Site Management

- Corporate HSE Management

- *And others…*
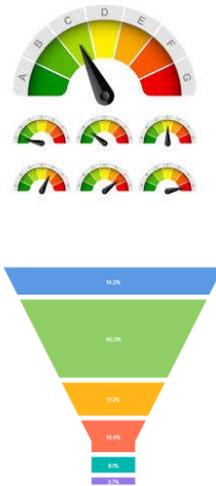
Drivers for changing MoC

- Recent major **accident** / near miss, series of (minor) **incidents**

- Regulatory **considerations**, audits / inspections **findings**

- Peer pressure/comparisons of existing Best / **Good Practise(s)**

- Unsatisfactory performance (indicators) and/or feedback from personnel

- Availability of resources (people & time)

- Significant site or company reorganisation or restructuring, or the outsourcing of a key function

And also:

- A change in company policy or a desire to standardise across the company

- IT tool-related change (end-of-life, cloud vs own, new all-in-one tool) as result of a policy update, procurement opportunity, etc

- A merger or acquisition leading to adoption of the MoC system of the other company

- Continuous improvement

Pitfalls

- Too wide or too limited MoC **scope**

- No **Owners** (system, procedure, changes) appointed

- **One-size-fits-all approach** for procedure

- Apply **extensive** procedures to a small organisation, or for a **limited number** of changes per year

- Include detailed requirements on company level

- Change the MoC system too frequently or not at all

- **Over apply (K)PI's** & dashboard, frequency not matching speed of the MoC process

- Overestimate **speed of change**, i.e. results of changes

- Underestimate long term consequences of **IT tools**, e.g. historical Change archive no longer accessible after IT-system change.

- Completed changes are not linked to **MoC procedure version**

- Underestimate impact of change of MoC system on **people behaviour**

- Assume that when a document of the MoC System is updated people will act accordingly

- Develop/purchase & **implement a tool** without a proper procedure and training

- Add target date for each change and/or each step of the process (overdues on the dashboard)

- Under or over defining prioritisation criteria
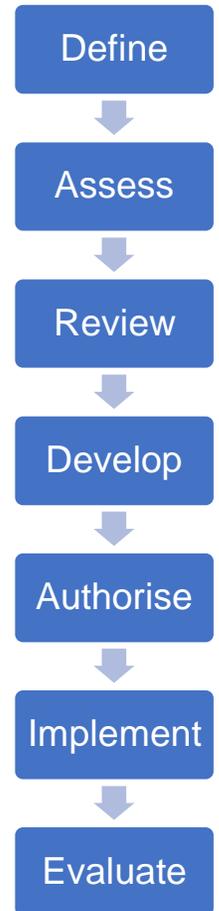
- And many more…

Advice

- Define the **scope** for Management of Change (and test the boundaries)

- Make changes, improve the system

- Apply continuous improvement to the MoC system, i.e. minor changes yearly and significant system changes rarely.

- **Trial / field test** the system prior to its official implementation (or major/system change).

- Approval of changes based on **risk level**

- Do **portfolio management** on a regular basis

- Use **checklists** per change type

- Learn from others (**peers, industry, books**)

- Ensure acceptance and **commitment** of key personnel.

- MoC systems should be **simple and fit for duty**, designed to fit the risks, organisational structure / competences, available resources and demand rate of a facility.

- Setup the MoC procedure as an **umbrella type procedure** with sub procedures for (e.g.) Organisational, Technology / recipe, Process Control, specific & repetitive changes (Safety System overrides, leak repair items, operating procedures, contractor company, etc), ITPM (including spare parts), non-process changes to the facility

- Provide adequate training (and retraining)

- Perform checks & audits (day/week/month/ quarter and yearly), apply performance indicators. Yearly Management Review on MoC System

- Apply other Performance Indicators when necessary

Conclusion

Define, assess, review, develop & autorise, implement **changes to** (parts of) the **Management of Change System** as it is a **regular change**.

- Develop & implement **system changes** as a high impact change !

- Feels as **common sense**, although not **common practise**

- Most of the time the **same resources** are needed

- MoC is all about people (tools should be supporting !)

- **Commitment** to the MoC System is boosted

- The change is **evaluated** on effectiveness, additional risks, impacts, improvements for future changes, etc (if it is part of your MoC process)

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Thank you !

Questions ?