

Guidelines for Management of change



The International Marine Contractors Association (IMCA) is the international trade association representing offshore, marine, and underwater engineering companies.

IMCA promotes improvements in quality, health, safety, environmental and technical standards through the publication of information notes, codes of practice and other documentation.

Members are self-regulating through the adoption of IMCA guidelines as appropriate. They commit to act as responsible members by following relevant guidelines and being willing to be audited against compliance with them.

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- ◆ Competence & Training
- ◆ Contracts & Insurance
- ◆ Health, Safety, Security & Environment
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IMCA HSSE 001 Rev. 1.1

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Date	Reason	Revision
April 1999	Initial publication	S&L 001
February 2017	To include more material and detail	Rev. 1
July 2020	Minor amendments made	Rev. 1.1

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IMCA HSSE 001 Rev. 1.1 – August 2020

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I Introduction

Experience has shown that major incidents have occurred when changes have been made to procedures, equipment, activity, approved practice, organisational structure, or personnel without proper evaluation of the potential impact of those changes. Failure to identify and manage significant change may compromise safe and efficient operations. Operational changes of all kinds may pose a hazard and increase risk exposure, requiring a reassessment of control measures to maintain acceptable levels of safety, to prevent equipment damage, and to prevent or limit environmental and health impacts.

Management of Change (MoC) is the process by which potential changes, both permanent and temporary, are analysed, their likely effects reviewed, consequences mitigated, and their implementation executed and communicated. Effective MoC is essential to ensure that hazards and risk arising from change are dealt with properly.

IMCA has developed the following guidance for MoC, covering how to manage operations which deviate from the original execution plan in a systematic and effective way, and providing assistance for members in the requirements for the application of a formal MoC process.

It is envisaged that this guidance may be applied to the management and documentation of:

- ◆ Technical change to equipment and infrastructure, engineering and/or design;
- ◆ Organisational change to team structures, competence and crewing;
- ◆ Operational change to the way equipment is operated, to work methods and/or agreed practices;
- ◆ Environmental changes, e.g. to tides, sea conditions or weather.

This more comprehensive guidance on this vital topic replaces IMCA S&L 001 – *Guidance for the management of change in the offshore environment*, first published in 1999. The document underwent further scheduled review and minor revision in late 2019 and early 2020.

I.1 Objectives of the Management of Change Process

Risks may arise when changes occur. Failure to identify and manage changes in a timely way may compromise health, safety, environment, operability, schedule, costs and reputation. To minimise risks, changes should be identified, analysed, reviewed and managed. Personnel should be appropriately trained in their respective roles and in management of change. Procedures for managing change should be documented, communicated and periodically reviewed and updated.

The objectives of a MoC procedure are to:

- ◆ Provide a systematic process to identify, evaluate, approve, notify, implement and monitor changes;
- ◆ Prevent changes that may threaten the achievement of company goals or project objectives;
- ◆ Permit changes that add value to the company, its assets or projects;
- ◆ Identify responsibilities for review and approval of proposed changes;
- ◆ Define change approval criteria and authorities;
- ◆ Establish a register to track and document change requests (CR);
- ◆ Restore original situation in case of temporary changes.

2 Glossary

Several specialised terms are used in this document. It is assumed that readers are familiar with most of them, however whilst they have been in use for many years, they could potentially be misunderstood. For clarity, these terms are defined below to ensure that readers understand what is meant by them in this document.

CR	Change Request
CRF	Change Request Form
ERP	Enterprise Resource Planning
HSE	Health, Safety and Environment
IMCA	International Marine Contractors Association
JSA	Job Safety Analysis
MoC	Management of Change
Originator	The person who proposes the change, which could be anybody in the company
QA	Quality Assurance
Responsible person(s)	The person(s) responsible for the implementation of the change

3 Managing Change – Which Changes May Occur?

A change is a substitution, alteration, or variation. Change can, and often does, occur in almost everything we do. Changes may be instigated by our own personnel, contractors, or clients for a variety of reasons. Change can also occur over time without immediate recognition and can be complex in nature.

Changes can be categorised as:

- ◆ Technical;
- ◆ Organisational;
- ◆ Operational;
- ◆ Environmental;
- ◆ Regulatory or policy.

3.1 Reasons for a Change

There may be many different reasons that necessitate change. Some examples are:

- ◆ Change of legislation, industry good practice, or codes and standards;
- ◆ Additional or revised scope of work by a client;
- ◆ A change of a work location;
- ◆ Change to environmental conditions beyond existing, agreed, or acceptable limits;
- ◆ Change to the sequence of work scope;
- ◆ Late deliveries;
- ◆ Required modification to project installation aids;
- ◆ Unexpected equipment breakdown, requiring replacement;
- ◆ Changes to personnel assignments;
- ◆ Technological developments.

3.2 Technical Change

A technical change is a change to any item of plant or equipment. The change may be a result of:

- ◆ Alteration to the original or subsequent design basis;
- ◆ Alteration that is inconsistent with the original design or design intent;
- ◆ A replacement of parts with parts of non-original or different specification or those not manufactured by the original equipment manufacturer (OEM);
- ◆ Alteration of the operation of plant or equipment differing from the manufacturer's recommendations or design parameters;
- ◆ Change of the rigging parameters for equipment differing from the original design requirements;
- ◆ Changes to any safety system, limit, alarm, indicator, or other element within such context;
- ◆ Alteration of the integrity of a plant and/or piece of equipment as a result of wear and tear, corrosion or any other deterioration;

- ◆ The addition of new technology to original equipment configuration.

(Note: Any alterations could also be temporary ones.)

3.3 Organisational Change

An organisational change involves a change to the organisational structure, either corporate or project related, and may include the following:

- ◆ Change to the roles and responsibilities of personnel;
- ◆ Change to reporting lines and/or communication lines;
- ◆ Change to roles critical to safety, health, environment or quality;
- ◆ 'Bridging' of management system elements when different organisations work together;
- ◆ Changes in organisational interfaces between parties, for example, between the company and its (sub) contractors, client, authorities or any other stakeholders;
- ◆ Changes in information systems/key software/ERP systems/reporting systems.

3.4 Operational Change

An operational change involves a change to operational practices of (for example) a vessel and its equipment, and may include changes to:

- ◆ Work methods;
- ◆ Change to the corporate or project management processes, procedures or standards;
- ◆ Transport or installation sequence;
- ◆ Equipment operating procedures;
- ◆ Voyage planning;
- ◆ Changes in planned simultaneous operations.

3.5 Environmental Change

An environmental change involves a change beyond existing agreed or acceptable limits in the conditions under which the work is being executed. This may include significant changes in:

- ◆ Climate, e.g. cold, heat, dry, wet, snow, ice;
- ◆ Weather, e.g. wind, rain, snow, fog;
- ◆ Air, e.g. dust, smell;
- ◆ Sea state, e.g. currents/tides, waves, swell;
- ◆ Seafloor, e.g. profile, rock, sand, mud.

3.6 Regulatory or Policy Change

A regulatory change involves change to the regulatory or statutory regime under which the work is being executed, or changes to company policy, and may include significant changes in:

- ◆ Operating parameters resulting from changes to regulatory requirements;
- ◆ Operating procedures resulting from changes to company policy and protocols;

- ◆ Security policy arising from a change to the security threat level affecting resources and procedures.

4 Management of Change – Responsibilities

It should be the responsibility of everyone at work to bring any significant change to the attention of supervisors, managers, or persons in charge and, at times, receive formal approval of the change. Formal responsibilities for MoC should be identified and documented. However, these responsibilities will often depend upon:

- ◆ Organisational structure;
- ◆ Type of change;
- ◆ Where and when the change will take place.

When an organisation prepares procedures for managing change, criteria should be specified, which can be used by personnel at all levels to evaluate, identify and request a change.

In the following sections, a number of examples are given.

4.1 Changes in Management System Documents

Changes in management system documents might include changes to company procedures or work instructions. Roles and responsibilities in this process are often clear and outlined in existing company procedures.

The following roles could be involved:

- ◆ Quality Assurance (QA) manager, ensuring compliance with quality policies and standards (depending on the subject, the discipline manager could be the QA manager, HSE manager or QHSE manager);
- ◆ Safety professionals, ensuring compliance with health, safety & environment policies and standards, and ensuring that risk assessments have been conducted as required;
- ◆ Technical discipline manager(s), often the owner(s) of the processes involved, ensuring that the change is correctly reflected in the relevant documentation and that the change is correctly implemented, e.g.:
 - communication of the change to relevant personnel;
 - verification that the change is being fully understood;
 - verification that action required for the full implementation of the change has been taken.

Changes to management system documents not including alteration of company procedures or work instructions may be managed via a document control system.

4.2 Changes to Equipment

The reasons for changes to equipment could be replacement, modernisation, capacity upgrade, etc. There may be project-related schedules and processes (procedures, work instructions) in place which may influence how, when, and by whom any changes to equipment are made.

Changes that include non-Original Equipment Manufacturer (OEM) parts or equipment must be assessed in detail to ensure safe, reliable operations and ensure warranties are maintained.

The following roles could be involved:

- ◆ Asset manager;
- ◆ Equipment manager;
- ◆ Operations manager;
- ◆ Technical experts (structural, mechanical, electrical, systems control, etc.);

- ◆ Location manager, e.g. a plant, yard, or offshore unit;
- ◆ Purchasing manager;
- ◆ QA manager;
- ◆ Safety (HSE) manager.

All roles listed above have defined responsibilities for ensuring that change takes place in a safe way and that reliable and safe operations continue.

4.3 Changes in Project Scope during the Preparation Phase of a Project

There could be many reasons for this type of change, but it often relates to changes in client requirements or to regulatory changes. As with changes to equipment, changes to the project scope need to fit into the project schedule. There may be a project-level MoC process in place to control when, how and by whom, any actions are taken. Also, a client verification process may also be in place, or changes may require client approval.

The following roles could be involved:

- ◆ Project manager, ensuring:
 - good understanding of the required change and managing the change process in the project team;
 - compliance with quality policies and standards (in consultation with the QA manager);
 - compliance with health, safety and environment (HSE) policies and standards, and risk assessments have been or will be conducted as required.
- ◆ Project engineer, covering the engineering aspects of the change and ensuring that the change is correctly incorporated in work manuals;
- ◆ Onshore management;
- ◆ Technical authorities and subject matter experts;
- ◆ Offshore management team, including offshore construction manager;
- ◆ Vessel management (captain, chief engineer, chief officer);
- ◆ Offshore client representative;
- ◆ Original requester.

4.4 Changes during the Execution of the Work

Required changes during the execution phase of a project are often of an operational nature. Examples could include:

- ◆ Breakdown of critical equipment;
- ◆ Last minute discovery of non-conformances requiring correction;
- ◆ Late deliveries necessitating changes in activity sequence.

A characteristic of this type of change is that it is unexpected and there is a significant element of time pressure. The issue must be resolved on the spot. A possible example might be a late request by the offshore client representative, resulting in additional costs or standby time, which the client later disputes – as being uninvolved in the MoC process.

It is important in these circumstances to give particular attention to ensuring that HSE risk levels remain within acceptable limits.

The following roles could be involved:

- ◆ Vessel master;
- ◆ Offshore construction manager or superintendent;
- ◆ Offshore client representative;
- ◆ Chief engineer;
- ◆ Field engineer;
- ◆ Project manager;
- ◆ Work supervisors and foremen;
- ◆ Vessel safety officer.

4.5 Appointed Responsible Manager (of Change)

MoC procedure should be clear about who should be responsible for managing a particular change. Depending on the type of change this could be a discipline manager, project manager, asset manager or other person in the company.

5 The Management of Change Process

5.1 Identifying the Requirement for Change

The MoC process starts when a problem or opportunity requiring a change is identified by somebody (hereafter called the originator). The identified change might be deviation from approved procedure, or a technical modification to equipment, systems or assets, or it might be changes to personnel required to complete a task or project safely.

The originator should be ready to provide justification for the requirement, including an estimated scope of work including cost and schedule if applicable. Also, the originator should be ready to identify:

- ◆ Whether or not a stop the job is required;
- ◆ Does the work site need to be made safe whilst the MoC is raised and dealt with?
- ◆ Sufficient detail of the proposed change to allow a good assessment to be made;
- ◆ If the change is temporary or permanent;
- ◆ What are some of the possible consequences?

The next step is for the originator to discuss this potential change with their supervisor who should assess the possible impact of the change and advise on the follow up.

5.2 Assess Impact of Change

Appropriate supporting information should be collected to support the risk assessment and decision-making process. The originator, their immediate supervisor and onboard management (as required) might then conduct a thorough assessment of the change scope. It is important to assess all the possible outcomes of the task with the change implemented, identifying any possible consequences of the proposed change.

Additionally, it is important to assess the physical implementation of the proposed change. For example, it might be that the approved rigging arrangement is not suitable for the task. The task of removing the existing arrangement and fitting alternative rigging should also be assessed. Both elements should be considered in the MoC risk assessment.

This discussion should include the following:

- ◆ The impact of the proposed change on all associated personnel, systems, equipment, processes, and procedures. The following criteria may prove useful:
 - low risk – the consequences of the proposed change do not introduce additional risk to personnel, environment, or equipment. In this case, it may be appropriate for the change to be authorised by onsite management;
 - medium risk – the consequences of the proposed change increases risk to personnel, environment, or equipment, or introduces significant impact on other operations. In such cases, it may be that the MoC should be authorised onshore;
 - high risk – the consequences of the proposed change impose an intolerable further risk to personnel or environment. Before proceeding further, this risk should be mitigated further or the activity/task cancelled.
- ◆ How critical or important is the proposed change;
- ◆ Risk assessment:
 - possible cumulative effect of multiple MoC processes;
 - consequences on any SIMOPS ongoing;

- possible consequences of implementing and/or not implementing the change;
- possible impact on crew/personnel.
- ◆ Whether or not there are further training requirements.

The results of that initial assessment could be:

- ◆ A decision that change is not required or not safely achievable;
- ◆ The change can be made without further assessments required;
- ◆ Submit the formal MoC request and impact assessment and refer to the appointed change manager.

5.3 Validate Change Actions and Approve

The originator, in conjunction with their supervisor, should collect all the relevant information and report to the appointed change manager. At this stage, the process may still be handled by offshore or vessel-based management. The proposed change should be discussed with representatives of all the technical disciplines involved, and a first evaluation should take place. This consultation or discussion of potential change may take a variety of forms and follow a number of stages.

It is important to have an understanding of the criticality of the proposed change. Even small or seemingly insignificant changes can have a major impact, so consultation may have to involve a wide range of personnel with the experience, knowledge and authority required to judge:

- ◆ The validity of the change request – by reviewing the proposed modification scope and identified consequences;
- ◆ How the change can be most safely implemented;
- ◆ Operational impact;
- ◆ How the change can be made most effective;
- ◆ Any required changes to training or competency;
- ◆ Budget impact.

If the criticality or importance of the change is high enough, then the change request may need to be sent ashore to more senior management for approval, rather than being approved by the offshore management team.

In some cases, this consultation may result in the decision that change is not required or is not safely possible. The affected areas and processes should be determined (e.g. health, safety, security, environment, costs, or schedule). Such evaluations should preferably be documented.

Appendix I gives some case studies of possible change scenarios and how evaluation of the change could take place.

The outcome could be:

- ◆ Change proposal and formal MoC process to be approved and handled offshore;
- ◆ Change proposal and formal MoC process to be approved and handled by more senior management ashore;
- ◆ Change rejected, after which the reason for rejection should be fed back to the originator.

Whether the change is approved or rejected, it will be necessary to ensure that the appropriate people are informed.

Please see Appendix 2 for a sample Change Request Form (CRF).

The following should normally be considered as a minimum, depending on the type of change and the actual circumstances in which the change would take place.

- ◆ Hazard identification and risk assessment – identify items or areas affected by the change under consideration. Use appropriate risk assessment tools and techniques to determine the potential impacts of a proposed change, e.g. perform a hazard identification study or job safety analysis (JSA);
- ◆ Development or revision of control measures – determine appropriate measures with which to manage the assessed risk. This may include revised procedures or plans, equipment modifications and staff training;
- ◆ Approvals and authorisation of change – with reference to the management system within your organisation, ensure that change is sanctioned by personnel with relevant experience, authority and accountability;
- ◆ Communication and implementation of approved activities/procedures – take practical steps to create awareness, build support, promote participation and ensure compliance with approved changes by all relevant personnel.

5.3.1 Set Up Management of Change Procedure

The MoC procedure should be documented and should reflect the specifics of the organisation. For a good understanding of the process visually, a flow diagram could be helpful.

Refer to Appendix 3 for a typical MoC flow diagram.

5.4 Plan Change

The planning should identify prerequisites and deliverables required as a result of implementing the change, and specify when the deliverables are required, before, during and after the change. There should be a clear understanding of the budget, resource, and schedule requirements for the proposed change. Quality assurance and measures and documentation requirements should be verified. At this stage, a suitable and sufficient job risk assessment (JRA) should take place.

5.5 Implement Change

It is important that any changes carried out are in accordance with the approved plan. Ensure that all affected personnel are advised of any working restrictions that are to be applied during the time of change.

Take care to ensure that any training and familiarisation takes place in good time.

5.6 Record Change

All associated records and supporting information should be updated. This could include:

- ◆ Drawings;
- ◆ Certification;
- ◆ Operating procedures;
- ◆ Maintenance records;
- ◆ Asset registers;
- ◆ Vessel specification and maintenance requirements;
- ◆ Operational and critical spares inventories;

- ◆ FMEA/FMECA (where appropriate);
- ◆ Changes to training and competence requirements;
- ◆ Personnel assessment reports and certification.

It may be appropriate to ensure that hard copies of some of this information is available at the work site or on the vessel.

5.7 Tracking and Verification of Change Actions

Following the change, care should be taken to ensure that the change or modification was implemented in accordance with the agreed plan and that the change achieves its objectives. This is an important part of the Management of Change process and can often be forgotten. It is particularly important to check the following:

- ◆ Do all affected systems and equipment operate within performance requirements and specification?
- ◆ Have all deliverables and documentation been received, reviewed, and filed appropriately?

5.8 Restore Original Situation

In case of a temporary change, the original situation should be restored in a controlled manner:

- ◆ Cancellation of temporary controls;
- ◆ Verification;
- ◆ Communication.

5.9 Lessons Learnt

Lessons learnt from the whole Management of Change process should be shared appropriately to those who would benefit. Particular consideration should be given as to whether or not the same change or modification is required elsewhere.

6 Change Request Form

Refer to Appendix 2 for a typical example of a CR form.

The adopted form should be company specific with reference to the corresponding company MoC procedure.

7 Change Register

Proposed changes should be administered in a dedicated register that could include information regarding:

- ◆ Change request (CR):
 - Originator;
 - Change manager.
- ◆ The status of evaluations;
- ◆ Decision; and in case of implementation:
 - Responsible person(s);
 - Tracking of required actions.
- ◆ Close out.

First Evaluation Scenarios

Scenario	First Evaluation	Outcome
Late delivery of vendor supplied items has an impact on the installation sequence plan.	The installation method will require redesign and rewriting of several installation procedures. There could be both commercial and HSE risks.	This needs to be managed according to the formal MoC procedure.
The customer requested the relocation of personnel escape capsules on a platform being designed. Engineering was requested to review change proposal.	This change does not alter escape routes or conflict other structures as defined in the general arrangement. Functionality of the capsule remains the same. No commercial impacts foreseen as detailed designs were not yet made.	No further formal MoC required. Impact to the construction sequence is clear. General arrangement drawing can be changed. Details can be worked out during further design.
The customer requires another colour for painting some structures.	The paint was ordered but for the vendor it was no problem to deliver another colour.	No further formal MoC required. Purchase order can be changed.
Just prior to mobilisation of a marine installation spread, revised vessel importation and clearance regulations were issued by the country in which the work was to be carried out.	This could have an impact on the physical and administrative requirements for clearing in the vessel and the time this will take. If it takes longer then there could be a potential impact to the offshore schedule with significant cost impact.	This should be managed according to the formal MoC procedure.
A winch used for installation works offshore breaks down. It is perhaps possible to use another one.	The word <i>perhaps</i> already indicates the outcome of this evaluation. A rerouting of winch wires over the deck is required. Is that safe? Can it be made safe and efficient? Is it all strong enough? Is the wire in good condition?	This should be managed according to the formal MoC procedure.
A closed diving bell's internal pipework needs to be replumbed to accommodate relocation of electrical equipment.	This can have an impact on the divers' ability to locate and isolate valves during an emergency in the bell, particularly if visibility in the bell is hindered.	This should be managed according to the formal MoC procedure.

A Sample Change Request Form (CRF)

Change title			
CRF no.	Vessel or project	Date	

Requestor name		Job title	
Project no.		Worksite	
Project name		Client	
Change effective from		Change effective until	
Original situation restored (yes/no)	Yes ☐ No ☐		

1.0 Requirement for change

State the description of change and the reasons why

Project Change	☐	Company Change	☒	Category	Choose an item.
Permanent	☐	Contingency/Temporary	☐		

Please add:

Change effective from:...

Change effective until:...

Original situation restored: yes/no

1.1 Affected documentation

List all documentation affected by this change

2.0 Change plan

Detailed description of how the proposed change will be implemented
Attach supporting information

3.0 Assess impact of change

CRF risk assessment number			
Consequences of the change risk assessed	Yes	☐	
Implementation of the change risk assessed	Yes	☐	

3.1 Change impacts					
Personnel	☐	Equipment/system capability	☐	Interfacing procedures	☐
Resources	☐	Emergency/contingency procedures	☐	Sequence of events	☐
SIMOPS	☐	Existing MOCs	☐	Schedule _____ hrs	☐
Others				Cost _____	☐

3.2 Onboard departments affected

Summary of impacts	Existing MoCs affected (if any)								
	<table border="1"> <thead> <tr> <th colspan="2">Change criticality</th> </tr> </thead> <tbody> <tr> <td>Low 1-8</td> <td>☐</td> </tr> <tr> <td>Medium 16-32</td> <td>☐</td> </tr> <tr> <td>High 64-256</td> <td>☐</td> </tr> </tbody> </table>	Change criticality		Low 1-8	☐	Medium 16-32	☐	High 64-256	☐
Change criticality									
Low 1-8	☐								
Medium 16-32	☐								
High 64-256	☐								

Project discipline experts consulted (if required)		Technical authorities consulted (if required)	
Other		Other	

4.0 Approval (* where appropriate/ ** if risk is medium or high)			
Job title	Name	Approval	Signature
Requestor			
Master			
Chief Engineer			
OCM			
Client Rep			
Third Parties			
Onshore Manager			

(delete as appropriate)

5.0 Implement change

6.0 Records and deliverables

List documentation updated and/or received relating to the change.

7.0 Completion and verification

Was the Change effective?	Yes	☐	No	☐
Are all affected systems and equipment operating within specification?	Yes	☐	No	☐
Have all deliverables been received, reviewed and filed?	Yes	☐	No	☐

Additional Comments.

8.0 Lessons learnt

Is the change applicable to other projects or vessels?	Yes	☐	No	☐
Lesson recorded in database and/or debrief report?	Yes	☐	No	☐

9.0 Completion sign off

Job title	Name	Completed	Signature
Requestor			

Scan and send completed CRF to onshore manager

A Typical Management of Change Flow Diagram

