



**EHSS Process Safety Management & Risk Management Plan Program**  
**PSM & RMP Employee Participation**

<b>Location / Applicability:</b> NAB Concentrates and Distribution Facilities	<b>Originating Department:</b> Process Safety Management Team, NAB EHS
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#### 1 PURPOSE

The purpose of this document is to comply with OSHA 29 CFR 1910.119 Process Safety Management and EPA 40 CFR 68 Chemical Accidental Release Prevention Programs. The PSM/RMP Employee Participation Procedure is created to ensure employee involvement in all aspects of the PSM/RMP process under Mosaic's Management System.

#### 2 SCOPE

2.1 Process Safety Management and Risk Management Plan requirements apply to the Mosaic sites listed below.

2.1.1 North America Business Unit facilities: Bartow, Faustina, New Wales, and Riverview

2.1.2 Distribution Business Unit facilities: Henderson, Hooker's Point, and Port Sutton

#### 3 RESPONSIBILITIES

The following responsibilities are associated with this program:

Category	Responsibility
PSM/RMP Program Oversight	The PSM team is responsible for working with facility personnel, EHS team members, the legal department, and operations to provide support on all elements of the PSM/RMP program, including compliance and implementation.
Employee Participation	The General Managers at the concentrates sites and Superintendents in our Distribution facilities are responsible for ensuring that employees are available for participation in the various aspects of the Mosaic Management System, including specific responsibilities required by PSM/RMP procedures.
Access of Information	The information management team works with individuals and functional group representatives to ensure that electronic documents are continuously accessible under Mosaic's document and records control policy.

#### 4 GENERAL REQUIREMENTS



4.1 Each facility shall consult with employees and their representatives on the conduct and development of all elements of PSM/RMP.






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- 4.2 Mosaic provides employees and their representatives access to PHA's and to all other information required to be developed under the PSM/RMP Program Standards.
- 4.3 The PSM/RMP program shall be developed as a joint effort between salaried and hourly employees.
- 4.4 Management will make a concerted effort to get input on the development and implementation of the program from all hourly employees who are involved with either handling any hazardous chemical or maintaining and equipment that is involved with the hazardous chemical.
- 4.5 Methods of obtaining employee feedback include safety committees, safety meetings, PSM/RMP Steering Committee meetings, and My Safe Workplace web site.
- 4.6  **Reference:** OSHA PSM 29 CFR § 1910.119(c)
- 4.7  **Reference:** EPA RMP 40 CFR § 68.83 Employee participation.

## 5 ADDITIONAL REQUIREMENTS FOR EMPLOYEE PARTICIPATION AND REFERENCES

- 5.1 Process Safety Information - Employees are given access to all Process Safety Information required to be developed under PSM and RMP standards. Affected employees are notified of any changes to the Process Safety Information through the Management of Change process.
  - 5.1.1  **Reference:** 02 PSM RMP Process Safety Information
- 5.2 Process Hazard Analysis - Every PHA has at least one union employee on the analysis team who is experienced and knowledgeable on the process to be evaluated. Appropriate means are provided to communicate the results of PHA's and actions to be taken to affected employees.
  - 5.2.1  **Reference:** 03 PSM RMP Process Hazard Analysis Program
- 5.3 Operating Procedures - Employees are involved in the development of operating procedures. Affected employees are trained on changes to the procedures before startup of the process. Operating Procedures are made readily accessible.
- 5.4 Training - Employees are trained and educated in the elements of Process Safety Management, are informed of the hazards of the applicable covered processes and are trained on safe work practices. Employees are trained in the procedures applicable to their job tasks and are consulted on the frequency of refresher training. Affected employees are informed of or trained in changes to the covered processes.
  - 5.4.1  **Reference:** Element 07, Training & Competency (document ID 48646465)
- 5.5 Contractor Safety - Contractor employees are trained and educated in the elements of PSM, in the hazards of the applicable process, and in safe work practices prior to conducting work. Safe work permits issued prior to the job re-emphasize Mosaic's



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safety requirements and anticipate and address potential hazards of the contractor work or other issues that may place employees, contractor employees, or Mosaic. Contractor employees at risk are provided access to PSM documentation If requested.

5.5.1 **Reference:** [Mosaic Phosphates Contractor Safety Management Program](#)

- 5.6 Mechanical Integrity - Affected employees are informed and trained on changes made to the Mechanical Integrity (MI) procedures. Affected employees have ready access to the MI procedures and documentation through their management/supervisor and the PSM website. Employees involved in maintaining the on-going integrity of process equipment are provided training in the procedures applicable to their job tasks.

5.6.1 **Reference:** [Mosaic Asset Integrity Program Folder](#)

5.6.2 **Reference:** [Mosaic Asset Integrity Program](#)

- 5.7 Hot Work Permit and Safe Work Procedures – Employees and contractors are trained in hot work and safe work procedures per the Mosaic Hazardous Work – Safe Work Permit process and Hot Work Welding Cutting program.

5.7.1 **Reference:** [Mosaic Phosphates Hazardous Work-Safe Work Permit](#)

5.7.2 **Reference:** [Mosaic Phosphates Hot Work Welding Cutting Program](#)

- 5.8 Management of Change and Pre-Startup Safety Review - Employees whose job tasks are affected by a process change are informed of or trained in the change prior to startup. Employees whose job function involves originating process changes are trained in Management of Change procedures. Process change documentation is accessible to employees through their management/supervisor. The PSSR confirms that change was properly made and affected operating employee training has taken place.

5.8.1 **Reference:** [Mosaic Management of Change Program](#)

- 5.9 Incident Investigation - Incident Investigation teams include hourly employees from the covered process area where the incident occurred. Contractor employees are included if the incident involved work of the contractor. Affected employees and contractor employees are informed of the findings of Incident Investigations.

5.9.1 **Reference:** [Mosaic Phosphates Incident Investigation Program](#)

5.9.2 **Reference:** [MMS Element 05, Incident Investigation \(document ID 48646465\)](#)

- 5.10 Emergency Planning and Response – All employees and contractors are trained in their responsibilities in the plan. Written emergency action plans and policies are accessible to employees and contractors. For comprehensive list of references for this topic, as managed by EHS and the training department, see guide linked below.

5.10.1 **Reference:** [12 PSM/RMP Emergency Planning & Response](#)



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5.11 Compliance Audits – PSM/RMP compliance audits are facilitated by the Corporate EHS Outreach group. Audit teams include at least one person knowledgeable in the process. The Audit Team interviews appropriate employees within the process. Appropriate means are provided to communicate the results of the audit and actions to be taken to affected employees.

5.11.1 **Reference:** MMS Element 08, Management System Assurance (document ID 48646465)

5.12 Trade Secrets - Employees have access to Trade Secret information as needed.

## 6 TRAINING

6.1 For information on training related to PSM/RMP: **Reference:** 05 PSM/RMP Operator Training

6.2 For information on Mosaic's Management System requirements for training, see **Reference:** Element 07, Training & Competency (document ID 48646465)

## 7 DOCUMENTATION AND ACCESSIBILITY

7.1 Employees are given access to PHA reports, operating procedures, and additional controlled documents and records through Mosaic's document management platform, Content Server.

7.2 Employees may navigate directly into Content Server or access PSM/RMP documentation through the employee homepage.

7.2.1 **Reference:** North America Business Unit PSM/RMP Page

7.2.2 **Reference:** Distribution Business Page

## 8 REFERENCES

References
Regulations: OSHA 29 CFR 1910.119, EPA 40 CFR 68
Mosaic Management Systems Elements Overarching Document (document ID 48646465)
02 PSM RMP Process Safety Information
03 PSM RMP Process Hazard Analysis Program
Mosaic Asset Integrity Program Folder
Mosaic Asset Integrity Program
Mosaic Phosphates Hazardous Work-Safe Work Permit



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References
Mosaic Phosphates Hot Work Welding Cutting Program
Mosaic Management of Change Program
Mosaic Phosphates Incident Investigation Program
05 PSM/RMP Operator Training
12 PSM/RMP Emergency Planning & Response
North America Business Unit PSM/RMP Page, Distribution Business Page

## 9 REVISION LOG

Rev. No.	Rev. Date	Revised By	Reason for Revision
0			Initial release
1	2018	J. Vincent	Review Cycle
2	2021	N. Ellis, E. Victorino	Review Cycle