

### **North America Assurance Program**

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### **Table of Contents**

1	<u>Purpose</u>	2
2	<u>Scope</u>	
3	<u>Appendices</u>	.2
4	General Requirements.	.2
5	General Responsibilities by Role	
6	Elements of a Self-Assessment Schedule	.4
7	Self-Assessment Execution	
8	Self-Assessment Results & Review	.6
9	Scoring Severity in Self-Assessments.	
10	<u>Inspections</u>	7
11	Assessor Training, Qualifications and Competencies	7
12	Program Review	8
13	Record Retention	8
14	<u>Definitions</u>	
15	<u>References</u>	8
16	Revision Log	q



#### 1 PURPOSE

The purpose of this program is to define responsibilities and establish methods for performing Self-Assessments and Inspections against the Environmental Health & Safety (EHS) programs and procedures for the North American Business (NAB) & North America Supply Chain Facilities. Performing self-assessments shall drive continual improvement by identifying notable practices, opportunities for improvement, and sharing across the organization.

#### 2 SCOPE

This program applies to all NAB and U.S. Distribution sites that are in-scope of the MMS.

- Bartow / S. Pierce, New Wales, Riverview, Faustina, and Uncle Sam facilities
- Four Corners / Wingate, and South Fort Meade mines
- Belle Plaine, Carlsbad, Colonsay, and Esterhazy mines
- Tampa Marine, Port Sutton, Hooker's Point, Big Bend, Pine Bend, Pekin, and Henderson Distribution Facilities.

Idle sites, capital, mergers/acquisitions are exempt as per the Mosaic Management System.

#### 3 APPENDICES

- Potash Self-Assessment Schedules
- Phosphate Self-Assessment Schedules
- Distribution Self-Assessment Schedules

#### 4 GENERAL REQUIREMENTS

4.1 Every site covered by this program shall review, support and maintain an active Self-Assessment schedule.

#### 5 GENERAL RESPONSIBILITIES BY ROLE

- 5.1 NAB Leadership
  - 5.1.1 Set the expectation that the self-assessment is a comprehensive evaluation of the strengths and weakness of the program being self-assessed as observed by those working within or in partnership within the program.
- 5.2 Site Leadership
  - 5.2.1 Review and approve the schedule on an annual basis.
  - 5.2.2 Assign self- assessment leads.
  - 5.2.3 Support / take action to achieve compliance if a failure is identified.

Effective Date: 8/25/2023



- 5.2.4 Ensure appropriate personnel are trained to meet all requirements of this procedure.
- 5.2.5 Assign the appropriate personnel to monitor the quality of the self-assessments.
- 5.2.6 Prioritize and support the time commitment, to all involved, to ensure the success of the process.

#### 5.3 EHS Professionals

- 5.3.1 Participate in the self-assessments where required.
- 5.3.2 Conduct self-assessments where required.

#### 5.4 MMS Team

- 5.4.1 Provide communications of changes to this program that impacts the facilities or the roles as applicable.
- 5.4.2 Support the facility-appointed self-assessment subject matter expert to develop the annual self-assessment plan/program/schedule.
- 5.4.3 Provide general support to ensure the process is carried out.

#### 5.5 Assessment Lead

- 5.5.1 Lead the efforts to ensure that self-assessments are completed at the facility within the established timelines.
- 5.5.2 Pull the assessment team together to complete the assessment, report out on findings to the leadership team.
- 5.5.3 Ensure reviews of the findings are completed with the appropriate facility members.
- 5.5.4 Ensure findings have appropriate corrective actions.
- 5.5.5 Present and review any significant findings from the self-assessments with the leadership group on a routine basis.

#### 5.6 Assessment Team

- 5.6.1 Complete assessment protocols in the inspection software application per allotted time.
- 5.6.2 Propose appropriate actions for any findings that come from the assessment.
- 5.6.3 Team shall include cross-functional members, which may include contractors, as needed.

#### **6 ELEMENTS OF A SELF ASSESSMENT SCHEDULE**

6.1 The self-assessment schedule shall allow for a risk-based approach to assessment development such that high risk activities, and the programs/procedures that are used to remediate risk, are evaluated.



- 6.2 All sites shall review and evaluate their compliance to BU programs as often as the frequency specified by appliable regulations. In the absence of regulatory requirements, sites shall review and evaluate their compliance to BU programs at an interval not to exceed 5 years.
- 6.3 <u>Setting Annual Assessment Schedule</u>
  - 6.3.1 The annual schedule at a minimum shall contain:
    - At least 1 assessment topic to be environmental-focused.
    - The site's Top 25 risks based on Inherent Risk score and top 25 based on residual risk score shall be reviewed, with consideration given to the associated topics to those risks and included, where appropriate, in the schedule.
    - The schedule shall include 1 Global Life Saving Rule Program as a self-assessment per year at a minimum.
    - The remaining assessments will be from NAB EHSS Programs.
      - The selection of the business unit programs will be determined by the facility with the assistance of the NAB MMS team, with reference to the NAB self-assessment program list.
      - Evaluation of risk, for the purpose of designing the annual schedule, may also include:
        - Incident investigation that identified failed controls
        - Non-conformities from previous self-assessments
        - Non-conformities from previous corporate assessments
        - Non-conformities from third-party assessments/inspections, including regulatory inspections, FM Global inspections, etc.
        - Significant risks per the EHS Risk Register
        - Negative performance trends identified
        - Evaluation of significant "near misses" from anywhere in the company (or industry where feasible)
        - Evaluation of effective implementation of the most relevant and proximal operational controls and MMS procedures
        - · Areas where there have been key personnel changes
        - Review of the top 25 Safety and Environmental risks based on Inherent Risk score and top 25 Residual Risk Score to determine the highest risk programs based on the inherent risks, to be taken into consideration when developing the assessment plan

e.g., Risk ID line states:

Fall down shaft while working in headframe = Working at Heights Program



Dyke Breach impacting natural water source = Surface Water Protection Program

- 6.3.2 Frequency of the execution of the assessments is determined at the facility level with the frequency recommended being no less than quarterly.
- 6.3.3 All assessments for that year must be completed by end of the calendar year.
- 6.3.4 Annual self-assessment schedule may include assessment topics in addition to the above requirements. They can be arranged as one-time events and noted as such in the Inspection Management Software and recorded in the change log on the selfassessment schedule.
- 6.3.5 The annual assessment plan shall be managed through a process developed by the facility.
- 6.3.6 The Self-Assessment schedule may be changed based on the risk associated with significant near misses, incident, assessment findings or business needs.
- 6.3.7 All changes to the Self-Assessment schedule shall be logged on the "change log" tab in the EHSS Self-Assessment Schedule tool.

#### 7 Self-Assessment Execution

- 7.1 Self-assessments shall utilize the inspection software application as determined by the business (example: Intelex).
- 7.2 Self-assessment protocols available in the inspection software application shall be utilized; where there is no pre-existing protocol, the General Self-assessment protocol may be used.
- 7.3 Self-assessment topics that will be re-occurring and require assessment with detailed questioning around the topic shall have a protocol developed by working with the NAB MMS team.
- 7.4 Self-assessment teams /assessors shall be identified by the facility leadership team/ Note: see section 9 below.
- 7.5 When feasible, the Self-Assessment team shall be a cross functional team (CFT) with representation from a variety of disciplines, including but not limited to Operations, Maintenance, Functional groups and EHS.
- 7.6 Where feasible, facilities can combine efforts and develop a self-assessment team to conduct self-assessments at multiple facilities.

#### 8 Self-Assessment Results & Review

8.1 Each self-assessment topic shall have a unique identifier in the inspection application software.



- 8.2 If there is a significant nonconformity, those shall be reviewed and communicated with the leadership group.
- 8.3 Significant nonconformity identified shall have documented corrective or preventive actions assigned in the inspection software.
- 8.4 Self-assessment results shall be formally reviewed and communicated to the facility leadership, through a process determined by the facility.
- 8.5 Corrective actions will be defined and reviewed through process defined by the site.
- 8.6 Corrective actions will be recorded in the online EHS inspection software.
- 8.7 Corrective actions will be approved through the workflows in the EHS inspection software.
- 8.8 Self-Assessment findings, observations and opportunities will be reviewed where appropriate at monthly steering committee meeting.

#### 9 Scoring Severity in Self-Assessment

- 9.1 All questions answered as No, Partial, or Unknown will require a severity level to be identified.
- 9.2 A & B findings are significant and shall be reviewed with Site Leadership and assigned an action plan within the inspection software immediately.
- 9.3 All significant findings require a formal investigation to determine root cause and eliminate reoccurrence.
- 9.4 There are 4 levels of severity to choose from in the inspection software.
  - Life Critical Fatality OR release posing a public threat; Finding identified an immediate
    risk to those working near the identified concern/failure, concern shall be addressed
    immediately; Finding was found to be widespread AND of high severity across the facility;
    Finding may require NAB or higher support to rectify.
  - High Permanent disabling injury or multiple injury; Finding identifies a risk that can be temporarily controlled through physical barriers, PPE or administrative controls, concerns shall be addressed <10 days; Finding was found widespread through the facility; Finding may require off site support to rectify.
  - Medium Injury / Illness with work restrictions; Finding identifies a risk that can be
    controlled through temporary engineering controls, concern shall be addressed through
    regular scheduled work; Finding is process critical; Finding was found across > 50% of the
    facility; Finding may require Senior level site management support to rectify



 Low – Injury / Illness with minor severity; Finding can be quicky and easily rectified with minimal support; Findings is non-process critical; Finding was found across < 50% of the facility.

#### 10 Inspections

- 10.1 Corrective actions from inspections will be tracked in an online platform.
- 10.2 Inspections will be completed on a an as needed basis or at their predetermined frequency as stated in any related programs.
  - Example: Walking Working Surface Inspections are completed on a quarterly basis as prescribed in the Corporate Walking Working Surface Program
- 10.3 Corrective actions will be defined and reviewed through process defined by the site.
- 10.4 Corrective actions will be recorded in the online EHS inspection software.
- 10.5 Corrective actions will be approved through the workflows in the EHS inspection software

#### 11 Assessor Training, Qualifications and Competencies

- 11.1 Individuals selected to serve on facility-level self-assessment teams shall be familiar with the requirements of the self-assessment protocols that apply to the area they are assigned.
- 11.2 Assessors' competency can be obtained by performing assessments under the direction of other experienced assessors or from completing the Mosaic Self-Assessment Assessor Training class
- 11.3 To ensure an appropriate level of knowledge and competency, assessors can assess the processes for which they are familiar.
- 11.4 To ensure the appropriate level of knowledge and competency, third party auditors may be used to perform self-assessments
- 11.5 The following table outlines training that is available for assessors that are required to complete Self-Assessments. All Assessors shall have at least on of the below training course listed to be a qualified assessor.

Audience	Training Elements / Topics	Frequency	Method
Assessors	Intelex EHS Microlearning – How to Complete an Inspection	Initial	Online Training
Assessors	Intelex EHS Microlearning – Facility Level Self- Assessment Training	Initial	Online Training

Commented [DME1]: Updated the wording here as Adriah made a good point that the previous wording made it so that the assessors needed to take all 3-training course, they are all similar so I think if they take at least one of the course that is sufficient. Thoughts?

Effective Date: 8/25/2023



Audience	Training Elements / Topics	Frequency	Method
Assessors	Corporate MMS Self-Assessment Training	Initial	Online Training

#### 11.6 Retraining

- 11.6.1 Refresher Training for Self-Assessment Assessors is available through online training platform upon request.
- 11.6.2 In addition, an employee shall receive additional training (or retraining) if any of the following conditions exist:
  - Program requirements change.
  - Changes in the workplace render previous training obsolete.
  - Inadequacies in the employee's knowledge is of concern

#### 11.7 Training records

11.7.1 Training records shall be maintained as per *Mosaic Document and Record Control* policy.

### 12 PROGRAM REVIEW

12.1 North America MMS Team will review this program every 3 years and update as required.

#### 13 RECORD RETENTION

13.1 Refer to the US retention schedule and Canada retention schedule for record retention policy.

#### 14 DEFINITIONS

14.1 All definitions in this program can be found in the <a href="EHSS Corp Reference Glossary of Terms">EHSS Corp Reference Glossary of Terms</a>.

#### **15 REFERENCES**

References (Number and title)		
Mosaic Management System Elements (folder link)		
Potash Self-Assessment Schedules		
Phosphates Self-Assessment Schedules		
EHSS Corp Reference Glossary of Terms		



### **16 REVISION LOG**

Rev. No.	Rev. Date	Revised By	Reason for Revision
0	August 8, 2022	MMS	Initial release
1	August 15, 2023	Marissa Delmage	Updated to reflect new MMS Element requirements
2	September 17, 2024	Rosalyn Cockerill	Update Program Owner to Manager EHS Compliance Assurance
3	September 17, 2024	Rosalyn Cockerill	Update Program Owner to Manager EHS Management Systems