

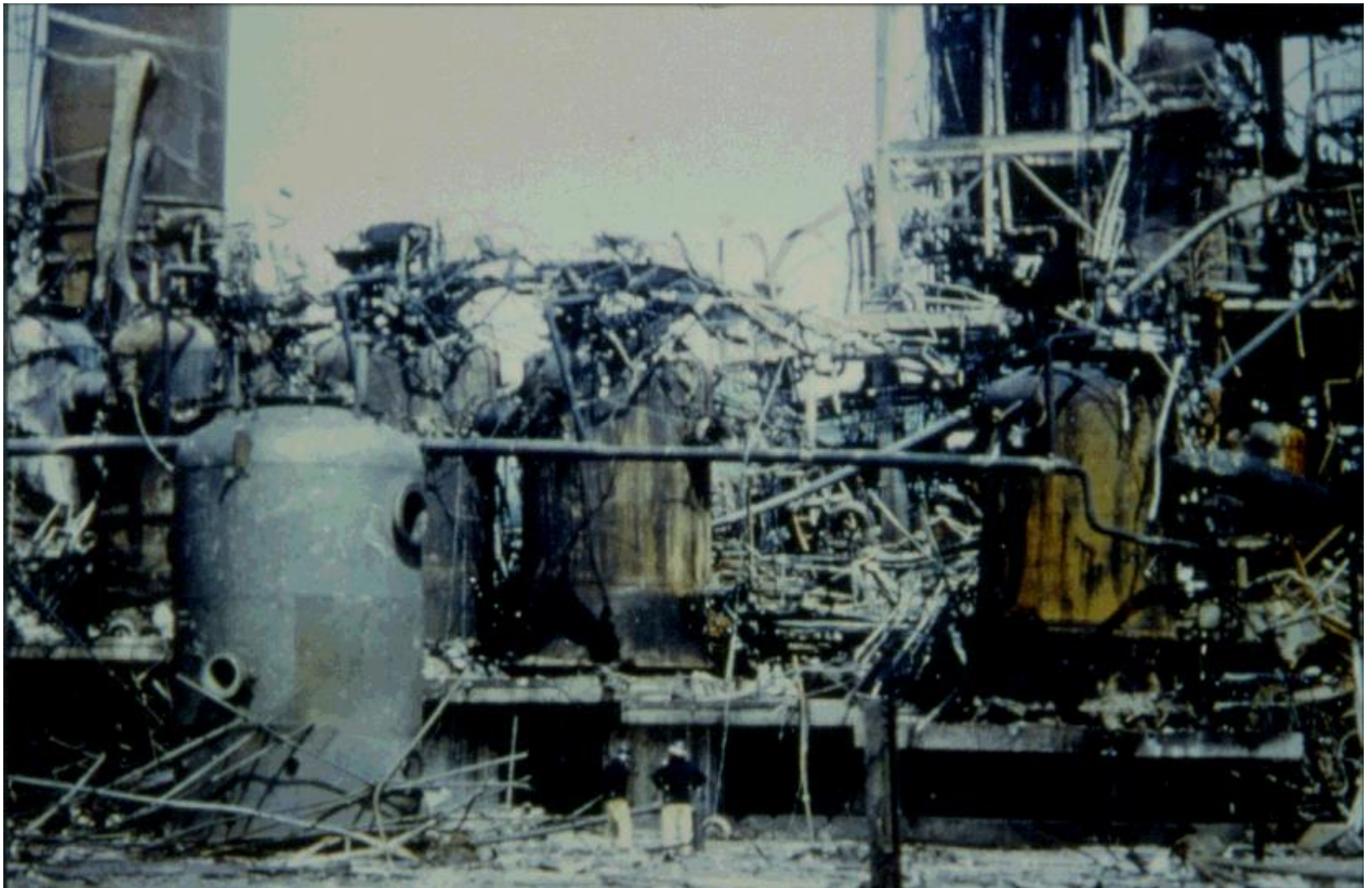
Identification of Hazardous Activities in the UK

21 – 23 February 2017, Zagreb, Croatia



Sandra Ashcroft
Health and Safety Executive

Flixborough – 1 June 1974



Today's system in UK

- UK system has evolved over 40 years
- Three part strategy
 - Identification of sites
 - Notification
 - Proportionate controls
 - Measures taken must be proportional to the risk
 - Mitigation measures
 - on and off site emergency plans,
 - information to the public
 - land use planning

Main legal instruments for identification



- Philosophy – responsibility for compliance is on regulated company
- Control of Major Accident Hazards Regulations – notification requirement for identification of sites which come into scope
- Hazardous Substances Consents – part of planning legislation to identify sites which carry out hazardous activities

COMAH - 1 June 2015



Implementing Seveso III



Health and Safety
Executive

The Control of Major Accident Hazards Regulations 2015



Guidance on Regulations

COMAH 2015 – Regulation 6 Notifications



- Based on:
 - Article 7 of Seveso III
 - Article 4 of Industrial Accidents Convention
- Company considers its inventory of dangerous substances
- If at or above the qualifying quantities, the company has to notify under Reg 6
- Requirement for detailed information
- Electronic form to be completed
- Trigger – to establish COMAH Intervention Plan as part of a programme of inspection

COMAH Competent Authority



the Competent Authority



Competent Authority

Health and Safety Executive

Environment Agency,
Scottish Environment
Protection Agency, and
Natural Resources
Wales

COMAH Competent Authority

Primary regulatory responsibilities:

- Provide information and guidance for operators
- Provide a programme of inspections
- Investigate incidents when things go wrong

Information and guidance for operators



- COMAH website <http://www.hse.gov.uk/comah/index.htm>
- Seveso website <http://www.hse.gov.uk/seveso/>
- Guidance on COMAH 2015
<http://www.hse.gov.uk/pubns/books/l111.htm>
- Health & Safety Laboratories classification services
<http://www.hsl.gov.uk/what-we-do/comah-2015/standard-classification-service>



Programme of Inspection

- Completeness check of electronic notification data
- Intervention plan for each major hazard facility, includes
 - Desk-based inspection of key documentation
 - On site inspection

Notification - issues

- Operators fail to notify:
 - Through lack of knowledge
 - ‘trying to get away with it’
- Enforcement management model:
 - Enforcement action: letters of advice through to notices or prosecution
 - Deliberate concealment or serious accident: more severe sanction

Regulators knowledge

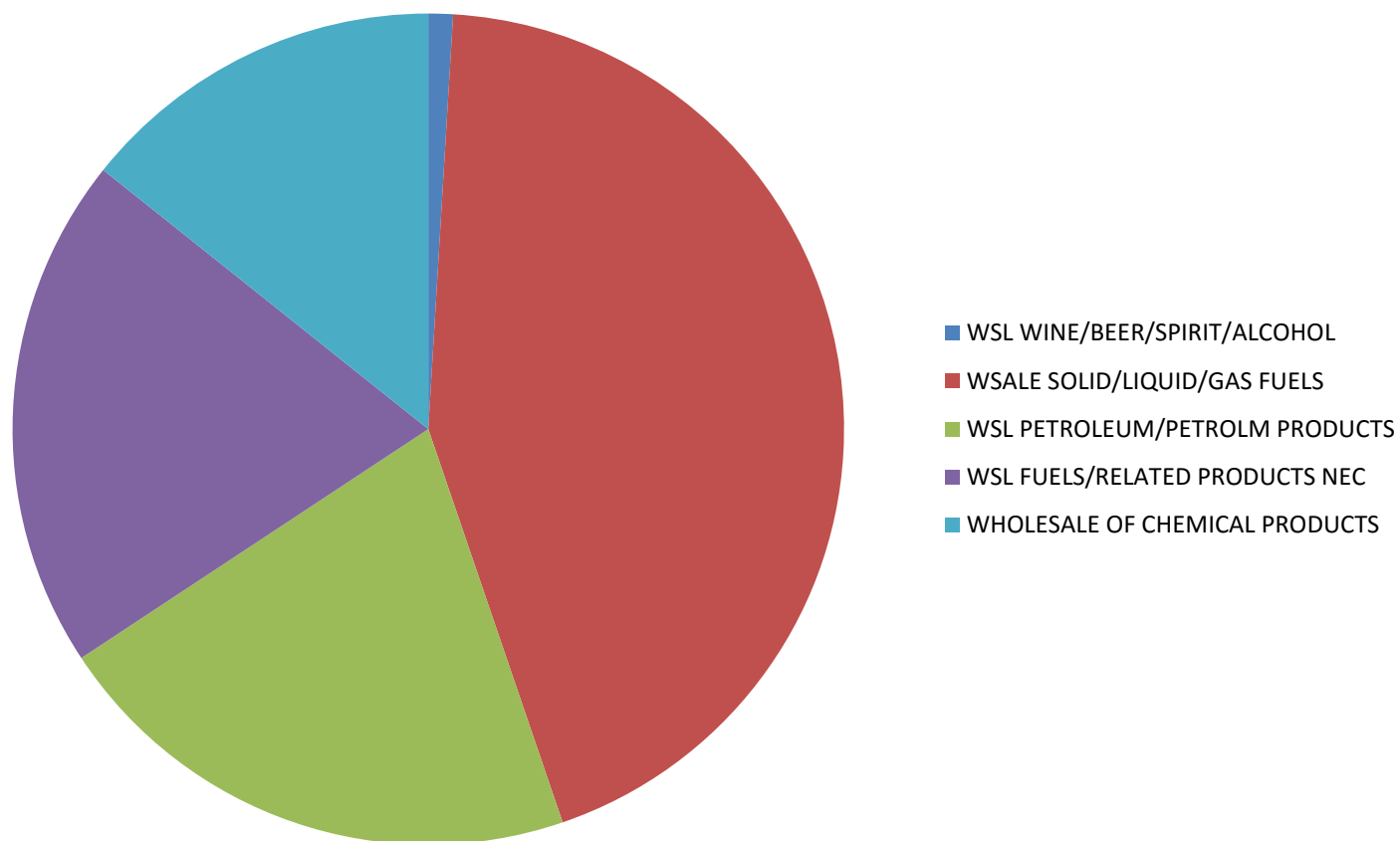
- Training inspectors
- Application of CLP to COMAH
- Understanding Schedule 1
- Sub-COMAH sites
- Regulatory contact officers

Which industries does COMAH apply to?

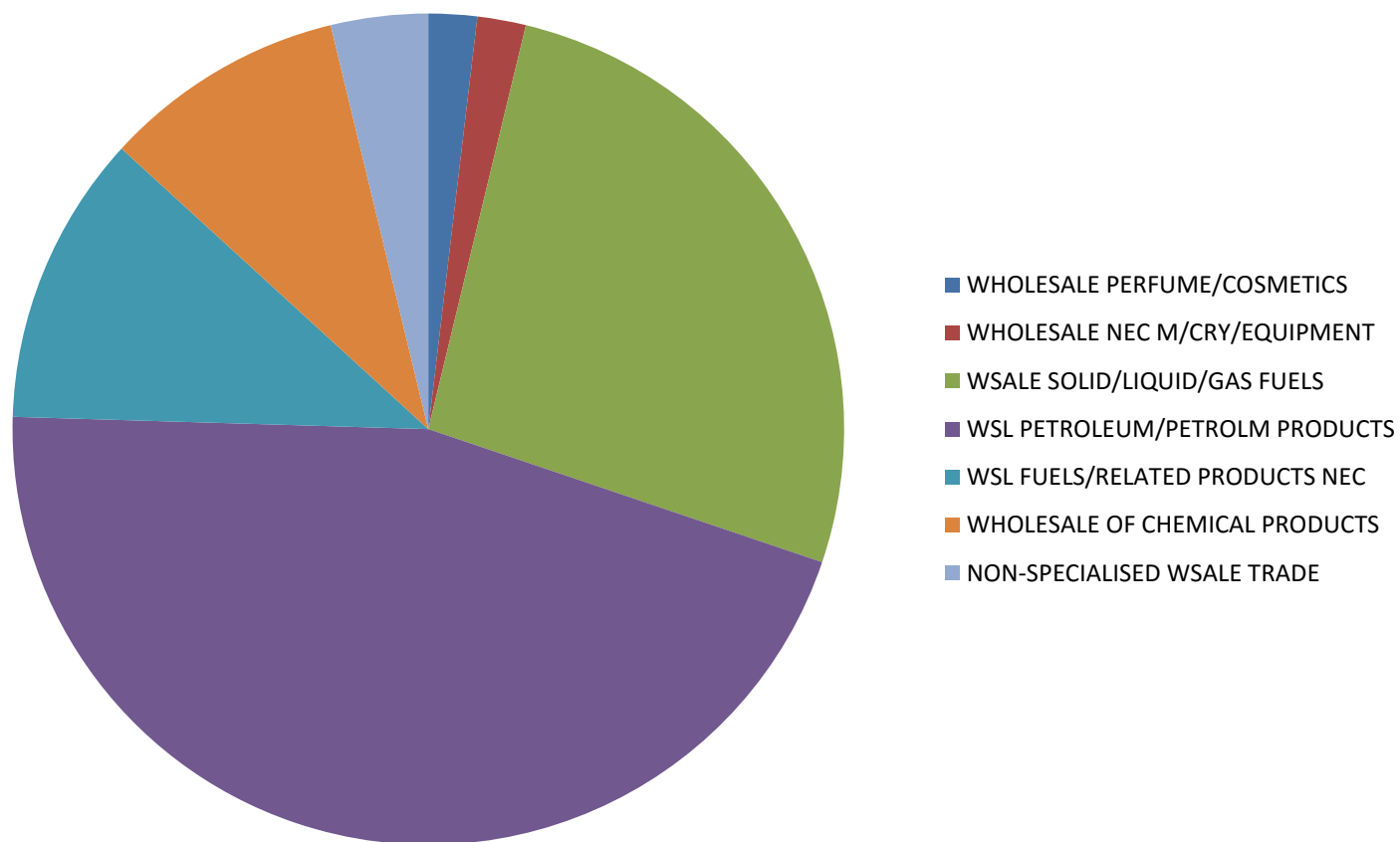


- Difficult to be precise
- Traditional COMAH industries
 - Chemical manufacturers
 - Petrochemicals
 - Explosive manufacturers
 - Whisky distilleries
- But it's an evolving picture
 - Storage
 - Brick manufacturers
- Any site with over the qualifying quantities

COMAH Lower Tier Operator



COMAH Upper Tier Operator





Thank you