

# COMAH and SEVESO

**\ A cost-effective approach to the  
regulation of onshore major hazards**

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# Introduction

- \\ UK COMAH/Seveso Competent Authority change programme – COMAH Remodelling
- \\ Targeting of regulatory effort
- \\ Site prioritisation and performance ranking

# Drivers for change

- \\ Experience of major incidents and 10 years of implementing COMAH/Seveso
- \\ Feedback from industry and regulators - the need for a better paced process, earlier conclusions within narrower timescales
- \\ Over reliance on the theoretical case for safety - inspection should be the primary method of checking industry's capability to effectively manage the risks
- \\ More effective and efficient working across the separate organisations that comprise the Competent Authority
- \\ Increasing scrutiny of costs and cost effectiveness

# COMAH Remodelling

- \\ Less focus on desk-based safety report assessment
- \\ Verifying demonstrations in the safety report through inspection
- \\ Removing the potential for legacy issues to accrue within the regime
- \\ Clear focus on inspection that is targeted at hazard and performance, and on closing out issues
- \\ Intervention plans are consistent, timely and transparent
- \\ Greater emphasis of scheduled multidisciplinary team inspections and on joint cross-cutting programmes of inspection to assess key topics, and report on standards of compliance

# Targeting effort

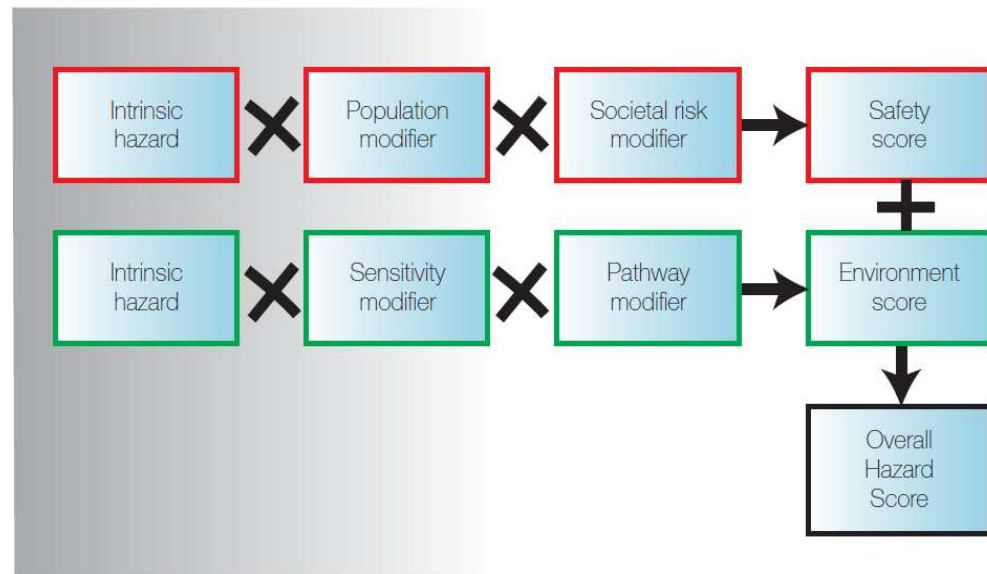
\\ The improvement to operational approaches has been accompanied by similar drive to improve targeting and transparency through:

- Risk ranking of COMAH sites
- Strategic priorities and performance rating
- Resource and workload planning

# Site prioritisation and performance ranking

Published methodology to demonstrate potential for safety and environmental **intrinsic hazard**

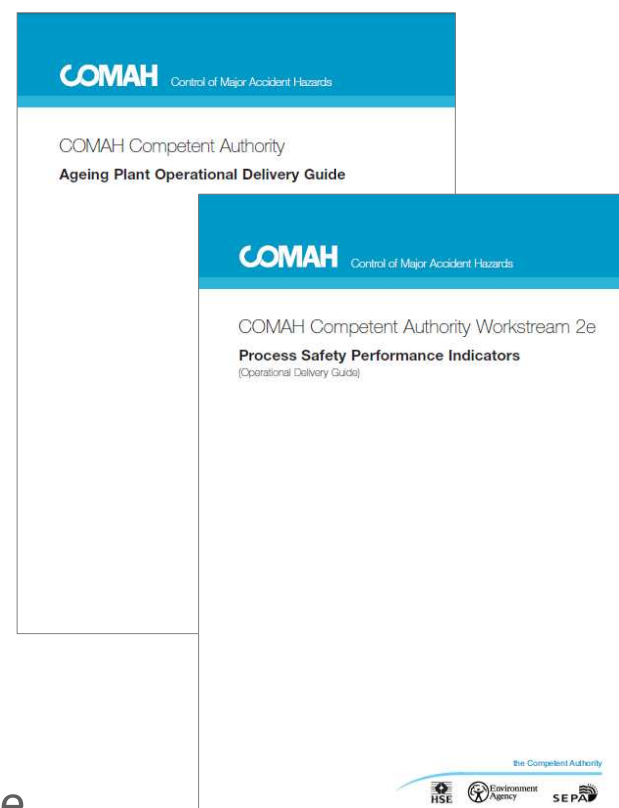
- Explains the role of intrinsic hazard in setting priorities
- Duty holders understand where they 'fit'
- Accounts for off site risk and provides a link to public assurance



# Site prioritisation and performance ranking

\\ Published methodology explaining the role of Strategic Priorities in sector performance

- Ageing Plant; Competence; Emergency Planning; Secondary and tertiary containment; Performance indicators; PSLG
- New priorities based on improved intelligence capabilities
- Every Strategic Priority supported by published Inspection Delivery Guide
- Duty holders can also apply the DG to their operations providing for meaningful discussions about performance



# Site prioritisation and performance ranking

\\ Published methodology explaining the role of **performance** in determining priorities

- Inspection Delivery Guide link to performance rating
- Performance rating linked to regulatory outcomes
- Duty holders can also apply the DG to their operations
- Provides a basis for discussions about performance at site and industry sector level

Table 1 Scoring against strategic priorities

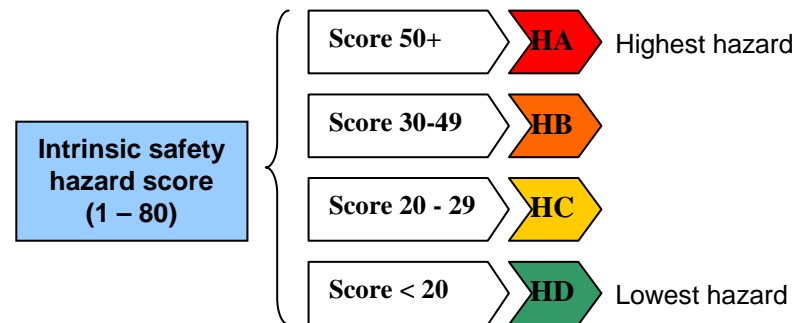
Standard	Description	Score
Unacceptable	Unacceptable - well below standard, enforcement action required. Poor operator attitude to required improvements.	60
Very poor	Somewhat below minimum legal or industry standard. Many success criteria not met or not fully met. A lot more effort required. Enforcement action likely.	50
Poor	Almost meets minimum legal or industry standard. More effort necessary. Several success criteria not fully met. Follow-up may be required and possible need for enforcement action.	40
Broadly Compliant	Meets minimum legal requirement or industry standard. More effort necessary. Some success criteria not fully met. May not preclude close out depending on scope of improvements required and operator attitude. Will need confirmation (at least with a letter) of work required. May need follow-up.	30
Good	More than minimum legal standard or industry standard, good practice. Good practice in most respects. Most success criteria met. Provision of advice or confirmatory letter only with no plans for follow-up.	20
Exemplary	Proactive in identifying and implementing improvements – Good practice or above in all respects. All success criteria met. No action required.	10



# Site prioritisation and performance ranking

\\ Next steps: Link **intrinsic hazard** and **performance** to influence regulatory activities on site

- Resource allocations proportionate to the major accident risk, site complexity and regulatory history
- Tool to provide a consistent starting point for inspection planners
- Enables duty holders to understand the process and forward plan
- Better assurance that resources are focussed on priorities



	Complexity			
Hazard Rating	Low	Medium	High	Very High
HA	26	52	104	156
HB	21	42	84	
HC	14	28	56	
HD	7	14	28	

# The future...

- \\ Clearer **strategic focus on improvements** across the sector as a whole
- \\ Ensure performance priorities are driven by **intelligence**
- \\ Will continue to be based on **thorough investigation and robust enforcement**

And in an increasingly challenging financial environment ...

- \\ **Transparency** key to explaining effectiveness, regulatory behaviour and costs
- \\ Demonstrate resources are **targeted** in areas of greatest importance

# Control of Major Accident Hazards (COMAH) Competent Authority

\\ **Continuing to** protecting people and the environment from, and limiting the consequences of, major accidents occurring within the onshore chemical manufacturing and process industries

\\ **For more information visit:** <http://www.hse.gov.uk/comah/>

the Competent Authority



# Thank you

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