

**THE FUTURE OF THE ADVISORY COMMITTEE ON
DANGEROUS SUBSTANCES (ACDS)**

RESULTS OF A STAKEHOLDER SURVEY

Produced by the ACDS Secretariat

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**Author: Janet Savin
Cleared by: Colin Potter**

ACDS REVIEW

Executive Summary

1 As part of the HSC/E Programme of Change, HSC's Advisory Committees (A/Cs) have been asked to review their committee structure, their work programme, and the way in which work activities are delivered, in the light of the contribution the committee currently makes/ can make towards HSC achieving its Strategic Aims.

2 The ACDS Secretariat undertook this review in June 2004, to enable an informed decision to be taken on whether continuation of the committee was considered necessary, and whether its reconstitution was considered justifiable in terms of contributing towards the HSC's Strategic Plan, and, if so, under what terms of reference.

3 Members of ACDS, observers from other government departments, and HSE advisors etc., were asked to complete a questionnaire, seeking their views on the value of ACDS, what it had achieved, whether it contributed to HSC's Strategic Aims, what it should aim to achieve in the future, and possible areas for improvement.

Conclusions

4 Main conclusions are:

- I. The majority of respondents (55%) want the committee to be retained. However, responses to specific questions in the survey seeking justification for ACDS to be retained failed to provide valid reasons - the main response was that the committee provides a useful discussion forum.
- II. 5% of respondents thought it should be retained only if it had a strong added-value programme, and 5% thought it could become an expert scientific A/C.
- III. The majority of respondents (77.50%) consider that ACDS contributes towards HSC's Strategic Aims. However, no valid examples were provided - moreover, dangerous substances are not included in HSC's current key Strategic Aims.
- IV. The majority of respondents (82.5%) consider that the committee's tripartite structure is still justified; however, 20% qualified their answers, e.g. "but with difficulty, because CBI does not represent industry and the trade union input is patchy."
- V. Respondents consider that the committee should adopt more flexible ways of working. Suggestions included:
 - i. Virtual consultation groups;
 - ii. More task and finish groups, rather than standing S/Cs; and
 - iii. A smaller, proactive stakeholder discussion group overseeing S/C and WG activity on specific industry sectors.
- VI. Respondents consider that the committee should be involved earlier in policy development, e.g. in negotiating EU Directives, and assisting in

- developing HSE's legislative proposals for implementing Directives, rather than assisting only in fine-tuning HSE's final proposals.
- VII. 45% of respondents consider that ACDS should not be amalgamated with another Advisory Committee, (whilst 42.50% expressed no views on this issue) - the main reason cited being that the committees' brief is already very/too wide.
 - VIII. The majority of respondents (82.5%) wish to retain some face-to-face meetings, but consider that use of e-mail should be maximised.
 - IX. Respondents consider that the ACDS Subcommittees make a good contribution to the committee's work, and should be retained. However, some believe that the Gas Safety S/C could possibly become a separate Industry A/C.
 - X. Most respondents (67.50%) consider the relative contributions from HSE staff and members are about right. However, some (10%) thought that there was too much input from HSE. Suggested ways in which this situation could be improved included:
 - i. Finding ways of encouraging members to support initiatives, and discuss and progress issues;
 - ii. Smaller groups, with strategic input from members;
 - iii. Encouraging members to submit papers on issues;
 - iv. Written papers in good time prior to meeting, with questions and answers only at meeting.
 - XI. Respondents consider that ACDS should seek opportunities for further co-operation with other A/Cs. Suggestions included:
 - i. Continuing support for joint ACTS/ACDS Working Group on Chemical Essentials;
 - ii. Possible co-operation with Chemical Industry Forum and/or Engineering Industry Forum;
 - iii. Possible Programme Board with members from each A/C to try to facilitate "joined up" working; and
 - iv. Regular meetings of A/C Secretariats to discuss areas of interaction.

Options

5 In the view of a small majority of stakeholders, the Advisory Committee should be retained, and reconstituted for a further period (as a minimum to December 2005). If this is the chosen option, then stakeholders consider that:

- I. The committee should meet as required by business needs, [probably no more than twice/three times per year, including one annual Open meeting].
- II. The committee should be reviewed annually thereafter.
- IV. If retained as subject Advisory Committee, the committee should seek a more proactive role - the bulk of its current workload is reactive e.g. fine-tuning HSE's proposals for implementing EU Directives.
- V. Members should be asked to undertake a more active role, including:
 - i. Showing more initiative in identifying suitable topics for discussion;
 - ii. Preparing papers for consideration;
 - iii. Contributing more to consultations on HSE policy documents;

- iv. Contributing more to requests for topics for inclusion in HSC's Forward Look;
- v. Identifying ways in which the committee can contribute towards implementation of HSC's Strategic Aims;
- vi. Participating more in discussions/debate on dangerous substances issues;
- vii. Examining the role and functions of the ACDS subcommittees to determine their future utility; and
- viii. Seeking opportunities for earlier involvement in development of HSC/E safety policy e.g. advising HSE on negotiations of EU Directives.

6 If, after consideration, this option is not chosen, then ACDS could be wound down completely; or converted into a consultative forum, which would be activated only as required. Whether the Committee is retained or not the future of the various sub-committees needs to be considered. Options for the subcommittees are:

- I. Transfer the work of the ACDS Major Hazards S/C to another A/C, possibly as a WG; or convert S/C into a consultative forum which would be activated only as required;
- II. Wind the work of the Flammable Substances S/C down completely; or transfer the work of the S/C to another A/C, (such as ACTS); convert the S/C into a consultative forum, which would be activated only as required;
- III. Wind down the ACDS Explosives S/C completely; or transfer the work of the S/C to another A/C, possibly as a WG; or convert the S/C into a consultative forum which would be activated only as required;
- IV. Wind down the Gas Safety S/C completely; or, subject to HSC approval, transfer the work of the Gas Safety S/C to an autonomous new Gas Industry Advisory Committee.

7 This report is being circulated to ACDS members for consideration and comment. There will be a slot for a short discussion at the next ACDS meeting on 23rd November.

8 A copy of this report will be incorporated in a paper to be submitted to HSE's Deputy Director General concerning the committee's possible reconstitution. Decisions concerning reconstitution will be made early in 2005.

1. Introduction

1 ACDS is one of a number of Advisory Committees set up by the Health and Safety Commission (HSC), to provide them with advice on subjects, such as nuclear and major hazards, and selected industries, such as the railways and construction industries. Although the committees follow HSC's tripartite structure and its' commitment to greater openness, they have each developed their own ways of working, in line with their specific remit, and individual levels of expertise.

2 ACDS was one of the first HSC Advisory Committees (A/Cs), constituted in May 1975, with its first meeting on 28 January 1977. The committee was set up to provide HSC with independent advice on issues concerning the control of risks arising from the manufacture and use of substances which present fire or explosion risks, or could contribute to such a risk, e.g. major chemical sites.

2. Membership

3 Members of ACDS are appointed by HSC, and are drawn from a wide range of specialisms and expertise, representing a wide range of stakeholder interests. The Chair is one of the Co - Directors of Policy Group responsible for safety issues, which also provides the Secretariat on behalf of the Commission. Currently, the members consist of four representatives each from the CBI, TUC, and Local Authorities, and four independent members (who are appointed for their technical expertise), and one consumer representative. Representatives from other Directorates within HSE and other government departments, with an interest in dangerous substances issues, also attend meetings, providing members with appropriate advice and guidance.

4 ACDS discharges its responsibilities through three formal meetings of the main committee each year, (generally in February, June and October, subject to HSE's business needs), and through Subcommittees (S/Cs) and Working Groups (WGs). The four subcommittees handle the detailed consideration of the more technical and legislative aspects of the committees' work, assisting HSE in the development of policy on Explosives, Major Hazards, Gas Safety and Flammable Substances, with the objective of allowing ACDS to concentrate on the more strategic issues.

3. Terms of reference

5 The committee's *raison d'etre* is reviewed every 3-4 years. Following its reconstitution in April 2000, the terms of reference for ACDS are:

- To consider and advise the Commission on:
- Methods of securing safety by controlling risks to persons at work and related risks to the public connected with the manufacture, import, storage, conveyance and use of dangerous substances (other than those dealt with by the Advisory Committee on Toxic Substances and

the Advisory Committee on Safety of Nuclear Installations) as defined from time to time by the Commission;

- Methods of securing health and safety by controlling risks to persons from flammable gas, connected with manufacture, supply transmission, distribution, installation and use, as defined from time to time by the Commission; and
- Other matters referred to them by the Commission or the Health and safety Executive.

4. History

6 During its first 10 -15 years, before the bulk of UK health and safety legislation was largely determined by the need to meet the requirements and implementation of various European Directives, ACDS was involved in some relatively ground-breaking work. This included making recommendations on the control of risks associated with dangerous substances in ports, and the transport of dangerous substances. This work culminated in the publication in 1991 of a report summarising the committee's deliberations on this topic, entitled "Major hazard aspects of the transport of dangerous substances".

7 That report:

- Identified the level of risk from the major hazard aspects of transport dangerous substances;
- Suggested ways of reducing the risks, and a method for assessing the reasonable practicality of those suggestions;
- Suggested risk criteria for use in situations involving the transport of dangerous substances, (mainly concerned with the overall national risk);
- Included an assessment of the relative risks of transporting dangerous substances by rail as compared to road.

5. Current position: Main committee

8 The work of ACDS has undergone a major transformation over the years. Since the mid-1990s the committee would seem to have been limited to a more subordinate role, largely commenting, and, in some cases, assisting in the further development of HSE proposals for implementing EU Directives, such as Seveso (via COMAH), and CAD/ATEX (via DSEAR), rather than exercising a real decision-making role in the development of HSC's dangerous substances policy.

9 Furthermore, during this period, the committee's role in the development of policy on the transport of dangerous goods (their main output in the committees' early years), seems to have been restricted to noting the latest updates in ADR/RID. These are very prescriptive, allowing HSE very little scope for change, and leaving ACDS on the side-lines. Responsibility for policy work on the transport of dangerous goods was subsequently transferred, in April 2004, across to the Dept. for Transport.

10 There have been two ACDS Open meetings, in February 2002, and September 2003, to meet the Commission's wish for more openness and public access to its Advisory Committees. The first Open meeting was reasonably well attended. However, at the second attendance was very poor.

11 The ACDS meeting scheduled for June 2004 was cancelled due to lack of substantive items; this has happened a few times in recent years. Both the next "normal business" meeting, and the third ACDS Open meeting will be held on 22 November 2004 in Manchester. We have timed the Open meeting - at members' request - to tie-in with the Institute of Chemical Engineers symposium, Hazards XVIII, (being held at the Manchester Conference Centre that week). By doing so, we aim to attract a larger, more participative audience than last year, with members of the public who work in a related field more likely to attend.

Current position: ACDS Subcommittees

5.1 Major Hazards Sub-Committee

12 The most recent Major Hazards S/C meeting was held in February 2003. Current work in major hazards includes implementing amendments to the Seveso 2 Directive, implementing recommendations following HSE's review of land use planning, and, pending Ministers' approval, there may be a further cross-government project to review policy on the way in which LUP applications are determined, i.e. to take account of societal risk when considering all LUP applications. How much of this work is likely to involve members of ACDS or the Major Hazards S/C is uncertain.

5.2 Flammable Substances Sub Committee

13 The Flammable Substances S/C has not met for the past two years, and much of the work of the Flammable Substances S/C has already been suspended as part of HSC/E's Programme of Change, whereby more of HSE's resources are being put towards supporting programmes of work contributing towards HSC's Strategic Aims.

5.3 Explosives Sub Committee

15 Similarly, the work of the Explosives S/C, which in the past has included a fundamental review of consequences models of explosive effects, and assisting HSE in the review of Explosives Act 1875, and in developing proposals for the Manufacture and Storage of Explosives Regulations 2004, appears to have been virtually completed.

5.4 Gas Safety Sub Committee

16 The position of the Gas Safety S/C differs from the committee's other S/Cs in a number of ways. It provides policy advice on one autonomous sector of industry, (whereas the Major Hazards S/C and Flammable Substances S/Cs cover a wide range of different sectors), and its workload

had not diminished much following the fundamental review of gas safety three years ago. However, during the past few months, as part of HSC's policy of concentrating resources on work programmes supporting its' strategic aims, HSE resources for this work have also been reduced considerably.

6. ACDS Review

17 The Advisory Committee on Dangerous Substances (ACDS) Secretariat undertook this review in June 2004, as part of reconstitution process. The committee was last reconstituted for 3 years in April 2000. However, due to lack of resources, ACDS obtained an extension to its current reconstitution until the end of 2004, to enable a review to be conducted, to assess whether reconstitution would be appropriate/ justified in terms of contributing towards HSC/E achieving its Strategic Aims.

18 The review has been undertaken against a background of HSE's Programme of Change; a general appraisal of the way health and safety is managed within industry; a review of the HSC's Advisory Committees' structure; and whilst the way in which the HSC's Strategic Aims are delivered has been under active consideration.

19 Past and present members, HSE advisers, observers from other government departments etc., to ACDS were sent a questionnaire, seeking their views on the value of the committees' work, its main achievements, its contribution to the HSC's Strategic Aims, possible future objectives, and areas for improvement.

7. Survey of stakeholders

20 A survey was undertaken as part of a review of the HSC's Advisory Committee on Dangerous Substances, (ACDS) to try to establish whether continuation of the committee was considered necessary, and, if so, whether its continuation was considered justifiable in terms of contributing towards the HSC's Strategic Plan.

21 A questionnaire (attached at Annex 4) was sent to 133 individuals, including members of ACDS, HSE officials, and others who have regular contact with the committee, for example, representatives from other government departments, and members of the ACDS S/Cs and Working Groups etc, and some ex-members of ACDS. A compilation of the individual responses is in Annex 1.

8. Summary of main findings of survey

22 The main findings are:

- I. The majority of respondents (55%) considered that the committee should be retained [because it provides a useful consultation forum for wider stakeholder involvement in development of new legislation and

guidance, and acts as a filter mechanism for such technical matters before proposals are submitted to HSC]. However, 5% of respondents thought it should be retained only if it had a strong added-value programme.

- II. 27.5% of respondents considered that the committees' continued existence could not be justified, because ACDS had not produced/undertaken any original work for many years, and was now largely processing EU Directives.
- III. Although 77.50% of respondents considered that ACDS contributed towards HSC's strategic aims, none of them provided a valid example of how ACDS contributed.
- IV. 82.5% of respondents thought that the tripartite structure was still justified, however, 20% qualified their answers, e.g., "but with difficulty, because CBI does not represent industry, and the trade union input is patchy." [Suggested alternative ways of working included more focus on industry sectors, and more involvement of consumers, emergency services [[and victim representation]].
- V. 39.39% of respondents wanted to retain the current committee structure. [Alternative suggestions were that ACDS should become a virtual consultation group; a smaller Cabinet-style group overseeing the work of the Subcommittees (S/Cs); or become an expert scientific A/C].
- VI. 71.87% of respondents considered that the committees' main achievement was assisting in development of HSE's proposals for implementing EU Directives via new legislation such as COMAH, DSEAR and MSER. [Suggestions for future objectives included improving LUP processes, and further development of risk models associated with major hazard plant].
- VII. 57.50% of respondents considered that ACDS made a real impact on HSC's decision-making, with 20% citing changes to DSEAR on the recommendation of ACDS as an example. [However, 8.57% considered that ACDS had no authority, and could not recollect a specific action that had had an effect on HSC].
- VIII. 45% of respondents thought they could identify more viable ways of working for the committee, e.g. virtual consultation groups; more task and finish groups, rather than standing S/Cs; and smaller, proactive stakeholder discussion group overseeing S/C and WG activity on specific industry sectors.
- IX. 32.50% of respondents considered that the work of ACDS does not need to be done by a full-blown A/C, (although 27.50% thought it does). [Alternatives suggested included a smaller A/C with more effective S/Cs, with individuals focussed on what they can bring to the work; ad

hoc task-oriented groups, kept up to date electronically and meeting only to solve real challenges].

- X. 62.50% of respondents thought that papers on HSE's legislative proposals for implementing EU Directives needed to be discussed by the committee, citing involvement in the implementation strategy, such as derogations, as the reason. However, some respondents considered that ACDS should be involved earlier, e.g. during negotiation of Directives.
- XI. 45% of respondents considered that ACDS should not be amalgamated with another Advisory Committee, (whilst 42.50% had no views on this issue). However, some respondents thought the Gas Safety S/C could stand alone as an Industry Advisory Committee (IAC).
- XII. 82.50% of respondents supported face-face meetings citing opportunity for stakeholders to discuss their differences and reach agreement/ resolve difficulties.
- XIII. 22.5% of respondents thought that the Explosives S/C made a good contribution to the work of ACDS, (whilst 12.5% and 10% respectively considered it made a good/excellent contribution), and 42.50% of respondents thought it should continue e.g. to complete the update of the Explosives Act 1875, and improve counter-terrorist resources.
- XIV. 17.50% of respondents thought that the Flammable Substances S/C made a good contribution to the work of ACDS, (whilst 12.5% and 10% respectively considered it made an average/very good contribution), and 42.50% of respondents thought that there was a continuing need for the Flammable Substances S/C.
- XV. 20% of respondents thought that the Gas Safety S/C made a good contribution to the work of ACDS, (whilst 15% and 5% respectively considered it made an average/very good contribution), and 47.50% of respondents thought that there was a continuing need for the Gas Safety S/C, with some suggesting it could possibly be a separate IAC.
- XVI. 20% of respondents thought that the Hazardous Substances S/C made a good contribution to the work of ACDS, (whilst 20% and 7.50% respectively considered it made an average/very good contribution), and 52.50% of respondents thought that there was a continuing need for the Hazardous Substances S/C. However, some respondents considered that the main committee and the Hazardous Substances S/C duplicated work on COMAH.
- XVII. 67.50% of respondents considered that the balance of input from HSE staff and members was about right, whilst 10% thought that there was too much input from HSE.

- XVIII. 55% of respondents suggested ways in which the relative contributions from HSE staff and members could be improved. Suggestions included finding ways of encouraging members to support initiatives/discussions and progress issues; smaller groups, with strategic input from members; encouraging members to submit papers on issues; and written papers in good time prior to meeting and Q & A only at meeting;
- XIX. 20% of respondents suggested opportunities for further co-operation with other A/Cs. Suggestions included continuing support for joint ACTS/ACDS Working Group on Chemical Essentials; possible co-operation with Chemical Industry Forum and/or Engineering Industry Forum; regular meetings of A/C Secretariats to discuss areas of interaction; and possible Programme Board with members from each A/C to try to facilitate "joined up" working.

9. Options

23 It is clear that although the committee has continued to make a useful contribution, through advice and comments on HSE's interpretation of EC Directives and their proposals for implementing them, nevertheless this work is far removed from the committee's original objectives and focus. Additionally, it is arguable that this is the most appropriate use of the time and expertise of some committee members. Similarly, in the current climate, the time spent preparing papers and attending meetings of the main committee, and/or its various S/Cs and WGs may not be considered the most appropriate, or cost-effective, use of HSE's resources.

24 That being said, the results of the survey showed a small majority in favour of ACDS continuing its work as an AC. The view of that small majority can be summed up as:

- I. HSC/E should consider reconstituting ACDS as a subject Advisory Committee for a further period [as a minimum to December 2005/6].
- II. The committee should meet as required by business needs, [probably no more than twice/three times per year, including one annual Open meeting.
- III. The committee should be reviewed annually thereafter.
- IV. If retained as subject Advisory Committee, the committee should seek a more proactive - the bulk of its current workload is reactive e.g. fine-tuning HSE's proposals for implementing EU Directives.
- V. Members should be asked to undertake a more active role, including:
 - Showing more initiative in identifying suitable topics for discussion;
 - Preparing papers for consideration;
 - Contributing more to consultations on HSE policy documents;

- Contributing more to requests for topics for inclusion in HSC's Forward Look;
- Identifying ways in which the committee can contribute towards implementation of HSC's Strategic Aims;
- Participating more in discussions/debate on dangerous substances issues;
- Examining the role and functions of the ACDS subcommittees to determine their future utility; and
- Seeking opportunities for earlier involvement in development of HSC/E safety policy e.g. advising HSE on negotiations of EU Directives.

25 In the light of the survey of stakeholders, and in view of the fact that the considerative role of the Committee has gradually diminished from providing strategic policy advice to HSC/E on a range of issues concerning dangerous substances, to commenting on HSE's proposals for implementing prescriptive EC Directives, without a real decision-making role, a number of alternative options emerged. These are:

- I. Winding ACDS down completely; or converting it into a consultative forum which would be activated only as required;
- II. Transferring the work of the ACDS Major Hazards S/C to another A/C, possibly as a WG; or converting the MH S/C into a consultative forum which would be activated only as required;
- III. Winding the work of the Flammable Substances S/C down completely; or transferring the work of the Flammable Substances S/C to another A/C, (such as ACTS); converting the S/C into a consultative forum, which would be activated only as required;
- IV. Winding down the ACDS Explosives S/C completely; or transferring the work of the Explosives S/C to another A/C, possibly as a WG; or converting the Explosives into a consultative forum which would be activated only as required;
- V. Winding down the Gas Safety S/C completely; or, subject to HSC approval, transferring the work of the Gas Safety S/C to an autonomous new Gas Industry Advisory Committee.

10 Next steps

26 Prior to recommendations being put forward to HSE senior staff, this report is being circulated to ACDS members for consideration and comment. Comments should be forwarded to the ACDS Secretariat. There will be a short slot for discussion under AOB at the next ACDS meeting on 23 November.

27 Following the ACDS meeting, and further discussion of the members views with HSE's senior management, a report will be submitted to HSE's Deputy Director General concerning the committee's possible reconstitution. The aim is to have that report ready for submission by the end of 2004.

Breakdown of survey responses

- 1 Total number of questionnaires issued = 133 (110 to Non-HSE and 23 to HSE staff)
- 2 Total number of responses received = 55 i.e. 41.35% of questionnaires issued
- 3 Total number of replies “unable to complete survey” = 15 i.e. 11.28% of questionnaires issued (27.27% of responses received).
- 4 Total number of completed questionnaires received = 40 i.e. 30.07% of questionnaires issued, (and 72.73% of responses received).

Question 1: What is your view of ACDS?

5 40 replies were received. 2 respondents (5%) had no views on the committee. 32.50% considered it “average. A full breakdown of the responses is shown below.

Question 1: What is your view of ACDS?		
No. of responses	Response*	Percentage
1	Poor	2.50
13	Average	32.50
11	Good	27.50
12	V Good	30.00
1	Excellent	2.50
2	Don't know	5.00
Total 40		100%
*Response options - Poor/ Average/ Good/ V Good/ Excellent/Don't know		

Question 2: How would you view the disbandment of ACDS?

6 40 replies were received. 4 people (10%) had no opinion, and 22 people (55%) thought the committee should definitely continue. A full breakdown of the responses is shown below.

Question 2: How would you view the disbandment of ACDS?		
No. of responses	Response*	Percentage
4	No opinion	10.00
1	Should disband	2.50
13	Possibly continue	32.50
22	Definitely continue	55.00

Total	40		100%
*Response options - No opinion/ Should disband/ Possibly continue/ Definitely continue			

Question 3: Do you consider the continued existence of ACDS justified?

7 40 replies were received. 8 people (20%) had no opinion, and 22 people (55%) thought the committee should be retained. A full breakdown of the responses is shown below.

Question 3: Do you consider the continued existence of ACDS justified?		
No. of responses	Response*	Percentage
8	No opinion	20.00
0	Unhappy	0.00
9	Sensible	22.50
1	Pleased	2.50
22	Should be retained	55.00
Total	40	100%
*Response options - No opinion/ Unhappy/ Sensible/ Pleased/ Should be retained		

Question 3a: If your answer to Question 3 - Do you consider the continued existence of ACDS justified? - is “possibly continue”, or “definitely continue”, on what basis would you consider its continued existence justified?

8 40 replies were received. 7 respondents (17.50%) had no views. Reasons for justifying the committee’s continuation included:

- Useful consultation forum for wider stakeholder involvement in development of new legislation and guidance;
- The basis of major hazards work and self-regulation can only be achieved by well-established, accepted ways of working. ACDS “multi-agency” approach delivers this;
- Should provide link and liaison with S/Cs and WGs where expertise and resource to develop and promote effective regulation can reside. Must be retained to initiate, manage and act upon S/C-based consultative development; and
- HSE must retain a filter mechanism for such technical matters before going to HSC with proposals.

9 However, 1 respondent considered that ACDS should be retained only if it had a strong added-value programme, but not if it remained a consultative forum. Another respondent believed whilst HSC/E needs consultation groups, these could be better - focussed.

Question 3b: If your answer to Question 3 - Do you consider the continued existence of ACDS justified? - is “no, should disband”, please give reasons/explain

10 3 replies were received. 1 respondent (33.3% - 7.5% of overall respondents) considered that ACDS had not produced/undertaken any original work for many years, and was now largely processing EU Directives. Another respondent believed that the committee should only be retained if it had a strong added-value programme, whilst the other respondent did not explain why he/she thought the committee should be disbanded.

Question 4: Do you consider that ACDS contributes to HSC/E’s strategic aims?

11 40 replies were received. 6 people (15%) had no views, and 31 people (77.50%) thought that the committee contributed towards HSC’s Strategic aims. A full breakdown of the responses is shown below

Question 4: Do you consider that ACDS contributes to HSC/E’s strategic aims?		
No. of responses	Response*	Percentage
31	Yes	77.50
3	No	7.50
6	Don’t know/No view	15.00
Total 40		100%
*Response options - Yes/ No/ Don’t know/ No view		

Question 4a: If your answer to question 4 - Do you consider that ACDS contributes to HSC/E’s strategic aims? - is yes, to what extent does ACDS contribute towards HSC/E’s strategic aims?

12 40 replies were received. 8 respondents (20%) had no views. However, none of the respondents were able to provide a valid example of how ACDS the committee contributed towards HSC/E’s strategic aims. Most of the replies referred instead to providing an independent/stakeholder view of the risk society would bear, and how best to promote safe systems of work when dealing with dangerous substances.

Question 4b: If your answer to question 4 - Do you consider that ACDS contributes to HSC/E’s strategic aims? - is no, how should it contribute towards HSC/E’s strategic aims?

13 3 replies were received. 1 respondent (33.3%) favoured other ways of getting input rather than via standing committees; another considered that it required more strategic input from members; whilst the third respondent thought that it would be difficult for ACDS to contribute towards HSC/E’s

strategic aims, because major hazards/dangerous substances were not part of HSC's current key strategic aims.

Question 5: Can the tripartite structure of ACDS still be justified?

14 40 replies were received. 3 people (7.50%) had no view, and 33 people (82.50%) thought that the tripartite structure of ACDS could still be justified. A full breakdown of the responses is shown below

Question 5: Can the tripartite structure of ACDS still be justified?		
No. of responses	Response*	Percentage
33	Yes	82.50
4	No	10.00
3	Don't know/No view	7.50
Total 40		100%
*Response options - Yes/ No/ Don't know/ No view		

Question 5a: If your answer to question 5 - Can the tripartite structure of ACDS still be justified? - is yes, please explain why.

15 40 replies were received. 4 respondents (10%) had no views. Although 30 respondents (75%) considered the tripartite structure of ACDS was still justified, 8 (20%) qualified their answers, as shown below:

- 1 respondent thought that the tripartite idea seemed to work, but was not sure if it were essential;
- 1 considered the tripartite structure justified, "but with difficulty, because CBI does not represent industry, and the trade union input is patchy";
- 1 respondent considered ACDS more multi-partite than tripartite;
- 1 respondent thought the committee needed additional focus;
- 1 respondent considered the tripartite structure justified, "but only if all parties recognise a need for a balanced approach, plus a degree of accountability"; and
- 3 considered it ensured representation of key stakeholders as long as supplemented by others where appropriate.

Question 5b: If your answer to question 5 - Can the tripartite structure of ACDS still be justified? - is no, please suggest alternative ways of working.

16 40 replies were received. 35 responses (87.50%) were N/A, and 5 respondents (12.50%) suggested alternative ways of working, namely:

- ACDS is, and should be, multipartite, including all stakeholders i.e. employers, TU, LA, consumer and emergency services;
- Should use consultative group/ community of interest via e-mail;
- More focus on industry sectors - ACDS is too broad in scope;

- Should include victim representation; and
- Should seek wider representation from interested individuals/groups who are willing, and technically able, to contribute to the work of ACDS.

Question 6: What do you consider is likely to be the most suitable structure for the committee in future?

17 33 responses were received. 3 respondents (9.09%) had no views. 13 respondents (39.39%) wanted to maintain the status quo, with 2 (6.06%) suggesting increased public interest members, and 1 (3.03%) suggesting that effort should focus on making the committee more effective and responsive, rather than changing the structure.

18 Other suggestions included:

- a smaller, more focussed Cabinet-style group with overview of the S/C;
- more proactive members;
- more flexible timing of meetings;
- a virtual consultation group;
- ACDS should become an expert scientific A/C;
- more direct connection between the consumer representative and the detailed work affecting consumers;
- more industry focus; and
- 1 respondent suggested widening the membership, with the regulator consisting of Chair and Secretary and those framing legislation; the enforcer consisting of LAs, police and other government depts., and subjects consisting of employer and employee reps., professional institutions, and respected Advisory Councils.

Question 7: What do you consider are the committees' main achievements?

19 32 responses received. 4 respondents (12.50%) had no views. 23 respondents (71.87%) considered that the committees' main achievement was assisting in developing HSE's proposals for the implementation of EU Directives via new legislation such as COMAH, DSEAR and MSER.

20 4 respondents (12.50%) highlighted work on pipelines, (leading to greater transparency in LUP and risk assessment methods used by HSE). The reviews of gas safety and debates on R2P2 were also mentioned.

Question 8: What should ACDS aim to achieve in the future? Please give specific examples.

21 25 responses received. Suggestions included:

- Focus on improving LUP processes and further development of risk models associated with major hazards plant;
- Greater discussion of risk issues, and action to reduce/eliminate risk;
- Resolving gas safety issues;

- Continued consultation and advice to improve explosives, firearms and other dangerous goods legislation;
- Aim to be more proactive and public in its work/raise its game to policy rather than detailed review of Regulations; and
- Consider risks from use of acetylene and hydrogen in fuel cells.

Question 9: Do you consider that ACDS makes a real impact on HSC's decision-making?

22 40 replies were received. 9 people (22.50%) had no view, and 23 people (57.50%) considered that ACDS makes a real impact on HSC's decision-making? A full breakdown of the responses is shown below.

Question 9: Do you consider that ACDS makes a real impact on HSC's decision-making?		
No. of responses	Response*	Percentage
23	Yes	57.50
8	No	20.00
9	Don't know/No view	22.50
Total 40		100%
*Response options - Yes/ No/ Don't know/ no view		

Question 9a: If your answer to Q.9 - Do you consider that ACDS makes a real impact on HSC's decision-making? - is yes, please give examples

23 34 replies received. 12 responses (35.29%) were N/A, and 7 respondents (20.58%) considered that HSC accepted changes to DSEAR on the recommendation of ACDS, and a further 7 respondents thought that ACDS provided underpinning technical expertise to allow HSC to take balanced decisions. However, 1 respondent (2.97%) considered that where the issues were not controversial or problematic the committees' role was little more than rubber-stamping.

Question 9b: If your answer to Q.9 - Do you consider that ACDS makes a real impact on HSC's decision-making? - is no, please explain.

24 35 responses received. 26 responses (74.28%) were N/A. 3 respondents (8.57%) considered that ACDS had no authority/ could not remember when a specific action has had affect on HSC. 1 respondent considered that whilst the S/Cs are the key to ACDS work, they were too heavily influenced by HSE staff.

25 Another respondent (2.85%) pointed out that HSC's 10 Year Strategy does not touch on dangerous goods, but considered that if ACDS did not exist to deal with the largely technical issues on dangerous substances, HSC would experience more lobbying by stakeholders.

Question 10: Can you suggest more viable alternatives ways of working?

26 40 replies were received. 8 people (20.00%) had no view, and 18 people (45%) were able to suggest more viable ways in which ACDS could work. A full breakdown of the responses is shown below.

Question 10: Can you suggest more viable alternatives ways of working?		
No. of responses	Response*	Percentage
18	Yes	45.00
14	No	35.00
8	Don't know/ no view	20.00
Total 40		100%
*Response options - Yes/ No/ Don't know/ no view		

Question 10a: If your answer to Q. 10 - Can you suggest more viable alternatives ways of working? - is yes, please give examples

27 34 responses were received. 11 responses (32.35%) were N/A, and 4 respondents (11.76%) had no views. Suggested alternative ways of working included:

- Virtual consultation groups;
- Smaller, proactive stakeholder discussion group - (too many attendees who don't contribute) - overseeing S/C and WG activity on specific industry sectors, where broader representation can be established;
- More structured meetings - less verbal reporting of paper information;
- More approval of documents outside committee following e-mail circulation;
- More task and finish groups, rather than standing S/Cs; and
- More imagination in holding public meetings.

Question 10b: If your answer to Q. 10 - Can you suggest more viable alternatives ways of working? - is no, please explain

28 40 responses received. 28 responses (70%) were N/A. Reasons for not being able to suggest more viable ways of working included:

- ACDS works quite well now;
- The forum of representatives enables wide consultation through networking;
- This is the best way of actively involving other parties;
- Difficult to suggest an alternative if the A/Cs role is to remain unchanged;
- ACDS Pipelines WG small well-focussed organisation, with clear remit which delivers results; and
- ACDS need to work in meetings and clear papers electronically.

Question 11: Does the work of ACDS need to be done by a full- blown HSC Advisory Committee (A/C)?

29 40 replies were received. 16 people (40.00%) had no view, and 11 people (27.5%) considered that the work of ACDS needed to be undertaken by a full- blown HSC committee. A full breakdown of the responses is shown below.

Question 11: Does the work of ACDS need to be done by a full- blown HSC Advisory Committee (A/C)?		
No. of responses	Response*	Percentage
11	Yes	27.50
13	No	32.50
16	Don't know/No view	40.00
Total 40		100%
*Response options - Yes/ No/ Don't know/No view		

Question 11a: If your answer to Q.11 is - Does the work of ACDS need to be done by a full- blown HSC Advisory Committee (A/C)? - is yes, please explain why

30 32 responses received. 19 responses (59.37%) were N/A. Reasons why members considered that the work of ACDS needed to be done by a full-blown A/C included:

- To provide transparency in the consultation process - ACDS provides good validity check;
- Wider range of views from a diverse group of members;
- If HSC unwilling to accept responsibility for approving Regs. ACDS must do so;
- An A/C can provide an overview that individual S/Cs cannot;
- It gives the committee the necessary stature and authority;
- Narrower structure might fail to capture all elements/effects in developing policies;
- Depends on what the alternatives and implications are.

Question 11b: If your answer to Q.11 is - Does the work of ACDS need to be done by a full- blown HSC Advisory Committee (A/C)? is no, please suggest alternatives

31 12 responses received. Alternative suggested included:

- Work could be done by virtual consultation group;
- Smaller "sector" groups and higher level Steering Group;
- Smaller A/C with more effective S/Cs, with individuals focussed on what they can bring to the work;
- Ad hoc task-oriented and focussed. Kept up to date electronically and meeting only to solve real challenges; and

- Workload could be shorter and sharper.

Question 12: Do papers relating to legislative proposals for implementing EU Directives need to be discussed by the committee?

32 40 replies were received. 6 people (15.00%) had no view, and 25 people (62.50%) considered that the committee should discuss papers relating to legislative proposals for implementing EU Directives. A full breakdown of the responses is shown below.

Question 12: Do papers relating to legislative proposals for implementing EU Directives need to be discussed by the committee?		
No. of responses	Response*	Percentage
25	Yes	62.50
9	No	22.50
6	Don't know/No view	15.00
Total 40		100%
*Response options - Yes/ No/ Don't know/No view		

Question 12a: If your answer to Q.12 - Do papers relating to legislative proposals for implementing EU Directives need to be discussed by the committee? - is yes, please give reasons

33 35 responses received. 9 responses (25.71%) were N/A. Reasons given included:

- Translation of EU Directives into the UK goal-setting framework now represents most important aspect of ACDS work;
- Although Directives have to be implemented - ACDS can agree implementation strategy e.g. derogations;
- ACDS should be involved earlier when Directives are being negotiated; and
- Because an acceptance by employer and employee is crucial to effective implementation and increased safety.

Question 13: What alternative ways of working can you suggest?

34 12 responses received. Suggestions included:

- Seek members views by e-mail or via website e.g. consultation similar to HSWA section 28 consultation;
- Specific consultation groups e.g. DEFRA's Air Quality Forum; and
- A/C should be consulted by UK policy representatives regarding the UK negotiating line.

Question 14: Is there any real value in face-to-face meetings?

35 40 replies were received. 3 people (7.50%) had no view, and 33 people (82.50%) consider that there is real value in face-to-face meetings. A full breakdown of the responses is shown below.

Question 14: Is there any real value in face-to-face meetings?		
No. of responses	Response*	Percentage
33	Yes	82.50
4	No	10.00
3	Don't know/No view	7.50
Total	40	100%
*Response options - Yes/ No/ Don't know/No view		

Question 14a: If your answer to Q.14 - Is there any real value in face-to-face meetings? - is yes, please give reasons

36 37 replies received. 4 responses (10.81%) were N/A. Reasons for face-to-face meetings included:

- Enables people to build up knowledge during discussions and views to be discussed;
- Development of meaningful regulation should rely on excellence, experience, enthusiasm and subtlety - these require face-to-face meetings;
- Huge value if you want stakeholders with varied positions to discuss their differences, find common ground, and to reach a solution; and
- Provides much more effective communication for groups which intend to meet infrequently.

Question 14b: If your answer to Q.14 - Is there any real value in face-to-face meetings? - is no, please suggest alternative ways of working

37 4 responses received. Suggestions included:

- Virtual consultation groups;
- Clear papers by e-mail and correspondence; and
- Some issues, not involving stakeholders' conflicts of interests, e.g. purely technical issues, could be dealt with by e-mail consultation

Question 15: Do you consider that ACDS could/should be amalgamated with another A/C?

38 40 replies were received. 17 people (42.50%) had no view, and 18 people (45%) consider that ACDS should not be amalgamated with another A/C. A full breakdown of the responses is shown below.

Question 15: Do you consider that ACDS could/should be amalgamated with another A/C?		
No. of responses	Response*	Percentage
5	Yes	12.50
18	No	45.00
17	Don't know/No view	42.50
Total 40		100%
*Response options - Yes/ No/ Don't know/No view		

Question 15a: If your answer to Q.15 - Do you consider that ACDS could/should be amalgamated with another A/C? - is yes, please

- i. explain why; and
- ii. suggest with which A/C it could be amalgamated

39 12 responses received. 3 respondents (25%) had no views.
Suggestions included:

- Major hazards are a special case for HSE - witness existence of HID - would not feel happy with any dilution of the current A/C;
- ACDS forms joint committees as appropriate where overlap exists;
- Not sure about amalgamating, but closer links with ACTS would be worthwhile for some topics relating to the health and safety of substances;
- Possibly ACTS?;
- As energy supply is more integrated than previously, it may be advantageous to combine with Gas S/C with electrical safety as an A/C on energy safety.

Question 15b: If your answer to Q.15 - Do you consider that ACDS could/should be amalgamated with another A/C? - is no, please explain why

40 6 responses received. Suggestions included:

- Scope of ACDS is already too wide - further dilution would be inefficient;
- ACDS already has a reasonable portfolio - should focus more on consultation and delivery;
- Need to maintain the input of specialist knowledge;
- ACTS is possibly the only candidate, but their modus operandi, and the technical expertise required, are completely different;
- Gas Safety S/C could probably stand alone as an industry A/C.

Question 16: Is there real value in face-to-face meetings?

41 40 replies were received. 6 people (15%) had no view, and 31 people (77.50%) consider that there is real value in face-to-face meetings. A full breakdown of the responses is shown below.

Question 16: Is there real value in face-to-face meetings?		
No. of responses	Response*	Percentage
31	Yes	77.50
3	No	7.50
6	Don't know/No view	15.00
Total 40		100%
*Response options - Yes/ No/ Don't know/No view		

Question 16a: If your answer to Q.16 - Is there real value in face to face meetings? - is yes, please give reasons

42 **NB** This question duplicates 14a.

Question 16b: If your answer to Q.16 - Is there real value in face to face meetings? - is no, please explain why

43 **NB** This question duplicates 14b.

Question 17: What is your view of the value of the contribution of the Explosives Subcommittee to the work of ACDS?

44 40 replies were received. 19 people (47.50%) had no view, and 9 people (22.50%) consider that the Explosives S/C makes a good contribution to the work of ACDS, and a further 22.50% thinking it makes a very good/excellent contribution. A full breakdown of the responses is shown below.

Question 17: What is your view of the value of the contribution of the Explosives Subcommittee to the work of ACDS?		
No. of responses	Response*	Percentage
0	Poor	0.00
3	Average	7.50
9	Good	22.50
5	V Good	12.50
4	Excellent	10.00
19	Don't know/No view	47.50
Total 40		100%
*Response options - Poor/ Average/ Good/ V Good/ Excellent/ Don't know/No view		

Question 18: Is there a continuing need for the Explosives Subcommittee?

45 40 replies were received. 17 people (42.50%) had no view, and 17 people (42.50%) consider that there is a continuing need for the Explosives S/C. A full breakdown of the responses is shown below.

Question 18: Is there a continuing need for the Explosives Subcommittee?		
No. of responses	Response*	Percentage
17	Yes	42.50
6	No	15.00
17	Don't know/No view	42.50
Total 40		100%
*Response options - Yes/ No/ Don't know/No view		

Question 18a: If your answer to Q.18 - Is there a continuing need for the Explosives Subcommittee? is yes, please give reasons

46 22 responses received. 5 respondents (22.72%) had no views. Reasons given included:

- To complete the task of placing remaining parts of Explosives Act 1875 in modern legislation;
- To sort out firearms legislation;
- To improve counter-terrorist resources;
- Ask the explosives industry - they consider it useful; and
- Important to have recognised expertise dealing with detail. Each group should remain active even though they may not need to meet.

Question 18b: If your answer to Q.18 - Is there a continuing need for the Explosives Subcommittee? - is no, please explain why

47 12 responses received. 4 respondents (33.3%) had no views. Explanations included:

- Work done on this particular topic;
- No need for both committee and S/C;
- In the light of the potentially light workload in the future, this could be converted from a standing S/C to an ad hoc S/C; and
- Business could be done by correspondence, with debate on issues at higher level.

Question 19: What is your view of the value of the contribution of the Flammable Substances Subcommittee to the work of ACDS?

48 40 replies were received. 22 people (55%) had no view, and 7 people (17.50%) consider that the Flammable S/C makes a good contribution to the work of ACDS. A full breakdown of the responses is shown below.

Question 19: What is your view of the value of the contribution of the Flammable Substances Subcommittee to the work of ACDS?		
No. of responses	Response*	Percentage
0	Poor	0.00
5	Average	12.50
7	Good	17.50
4	V Good	10.00
2	Excellent	5
22	Don't know/No view	55
Total	40	100%

*Response options - Poor/ Average/ Good/ V Good/ Excellent/ Don't know/No view

Question 20: Is there a continuing need for the Flammable Subcommittee?

49 40 replies were received. 19 people (47.5%) had no views, and 17 respondents (42.50%) consider that there is a continuing need for the Explosives S/C. A full breakdown of the responses is shown below.

Question 20: Is there a continuing need for the Flammable Subcommittee?		
No. of responses	Response*	Percentage
17	Yes	42.50
4	No	10.00
19	Don't know/No view	47.50
Total	40	100%

*Response options - Yes/ No/ Don't know/No view

Question 20a: If your answer to Q.20 - Is there a continuing need for the Flammable Subcommittee? - is yes, please give reasons

50 22 responses received. 7 respondents (31.81%) had no views. Reasons given included:

- To complete follow up e.g. in DSEAR and petrol licensing;
- S/C still needed whilst explosives - related Regs. continue to be brought forward; and
- If HSC/E still involved in these areas, it needs structures to carry work forward.

Question 20b: If your answer to Q.20 - Is there a continuing need for the Flammable Subcommittee? - is no, please explain why

51 13 responses received. 8 respondents (61.53%) had no views. Explanations given included:

- Its job is done; and

- The FS S/C has not met since end of 2002, when DSEAR came into force, and has not been missed/needed

Question 21: What is your view of the value of the contribution of the Gas Subcommittee to the work of ACDS?

52 40 replies were received. 23 people (57.50%) had no view, and 8 people (20.00%) consider that the Gas S/C makes a good contribution to the work of ACDS. A full breakdown of the responses is shown below.

Question 21: What is your view of the value of the contribution of the Gas Subcommittee to the work of ACDS?		
No. of responses	Response*	Percentage
0	Poor	0.00
6	Average	15.00
8	Good	20.00
2	V Good	5.00
1	Excellent	2.50
23	Don't know/No view	57.50
Total 40		100%
*Response options - Poor/ Average/ Good/ V Good/ Excellent/ Don't know/No view		

Question 22: Is there a continuing need for the Gas Safety Subcommittee?

53 40 responses were received. 18 people (45%) had no view, and 19 people (47.50%) consider that there is a continuing need for the Gas Safety S/C. A full breakdown of the responses is shown below.

Question 22: Is there a continuing need for the Gas Safety Subcommittee?		
No. of responses	Response*	Percentage
19	Yes	47.50
3	No	7.50
18	Don't know/No view	45.00
Total 40		100%
*Response options - Yes/ No/ Don't know/No view		

Question 22a: If your answer to Q.22 - Is there a continuing need for the Gas Subcommittee? - is yes, please give reasons

54 26 responses received. 6 respondents (23.07%) had no views. Reasons given included:

- New safety challenges are emerging with multi-skilling that has yet to be evaluated in terms of effective workplace and public safety.
- The WGs appear to be moving forward, but the Gas Safety S/C needs higher priority - this remains an important area for improvement;
- Removal of the Gas Safety S/C without a viable alternative would be a backward step; and
- Should be redefined as an IAC, separate from ACDS.

Question 22b: If your answer to Q.22 - Is there a continuing need for the Gas Subcommittee? - is no, please explain

55 10 responses received. 6 respondents (60%) had no views.
 Explanations included:

- Its done its job; and
- It would probably be more useful, and, hopefully, more proactive, in taking work/recommendations from the fundamental gas review forward as an Industry A/C.

Question 23: What is your view of the value of the contribution of the Major Hazards Subcommittee to the work of ACDS?

56 40 replies were received. 19 people (47.50%) had no view, and 8 people (20.00%) consider that the Major Hazards S/C makes a good contribution to the work of ACDS, whilst 8 people (20.00%) believe it makes an average contribution. A full breakdown of the responses is shown below.

Question 23: What is your view of the value of the contribution of the Major Hazards Subcommittee to the work of ACDS?		
No. of responses	Response*	Percentage
0	Poor	0.00
8	Average	20.00
8	Good	20.00
3	V Good	7.50
2	Excellent	5.00
19	Don't know/No view	47.50
Total 40		100%
*Response options - Poor/ Average/ Good/ V Good/ Excellent/ Don't know/No view		

Question 24: Is there a continuing need for the Major Hazards Subcommittee?

57 40 replies were received. 16 people (40.00%) had no view, and 21 people (52.50%) consider that there is a continuing need for the Major Hazards S/C. A full breakdown of the responses is shown below.

Question 24: Is there a continuing need for the Major Hazards Subcommittee?		
No. of responses	Response*	Percentage
21	Yes	52.50
3	No	7.50
16	Don't know/No view	40.00
Total 40		100%
*Response options - Yes/ No/ Don't know/No view		

Question 24a: If your answer to Q.24 - Is there a continuing need for the Major Hazards Subcommittee? - is yes, please give reasons

58 25 responses received. 6 respondents (24%) had no views. Reasons given included:

- Important to have recognised experts handling the detail - will be required for COMAH review soon;
- Excellent consultative forum encompassing HSE expertise & representation from industry & local government;
- Doing some important work in the pipelines area via Pipelines WG contributing to review of LUP, societal risk debates & future Directives on pipelines & revisions to COMAH; and
- On balance, yes, but there is currently duplication with main ACDS.

Question 24b: If your answer to Q.24 - Is there a continuing need for the Major Hazards Subcommittee? - is no, please explain why

59 9 responses received. 4 respondents (44.44%) had no views. Explanations included:

- Its done its job;
- On COMAH, MH S/C and ACDS overlapped each other quite a lot;
- Whilst it has done some useful work in the Pipelines WG & on LUP in the MH S/C, recently it has been largely "processing" EU Directives; and
- S/Cs work well given their brief; however, they tend to perpetuate themselves, are somewhat pedestrian, and need positive leadership.

Question 25: How do you value relative input/contribution of HSE staff v. members?

60 40 replies were received. 3 people (7.50%) had no view, and 27 people (67.50%) consider that the balance is about right. A full breakdown of the responses is shown below.

Question 25: How do you value relative input/contribution of HSE staff v. members?		
No. of responses	Response*	Percentage

10	Too much from HSE	25.00
0	Too much from members	0.00
27	About right balance	67.50
3	Don't know/No view	7.50
Total	40	100%
*Response options - Too much from HSE/ Too much from members/ About right balance/ Don't know/No view		

Question 26: How could this (relative input/contribution of HSE staff v. members) be improved?

61 23 responses received. 1 respondent (4.34%) had no views. Suggestions included:

- HSE needs to find ways of encouraging members to support initiatives/discussions, and then find innovative ways of progressing issues;
- Possibly smaller groups, providing strategic input from members;
- Written papers in good time prior to meeting and Q & A only at meeting;
- ACDS should contribute earlier in the policy-making cycle. HSE seems reluctant to discuss policy until it is practically ready to broadcast; however, the A/C could help in the formative stages;
- Encourage members to submit papers on issues; and
- Sometimes too much from HSE - should be giving responsibilities to members at times, within a more explicit work programme for ACDS.

Question 27: What other projects can you suggest for further co-operation with other A/Cs, (e.g. ACTS/ACDS Chemical Essentials project)?

62 13 responses received. 5 respondents (38.46%) had no views. Suggestions included:

- Chemical Essentials **must** continue - numbers of asphyxiant cases may increase as a result of DSEAR requirements in respect of explosible dust;
- Crossover with EIF & CIF - get more "global";
- ACTS deals with generic toxic substances in the regulatory role of toxic substances, by its' S/C WATCH setting OELs. It is rather different procedurally, and the expertise required is entirely different;
- Secretariats should meet periodically to discuss areas of interaction to ensure good liaison and that supplementary areas of interest are given weight e.g. ACTS should consider effect of CPL classification on COMAH;
- There should be a "Programme Board" which includes two from each A/C, and whose function is to facilitate "firmed up" working.

Question 28: Any other comments?

64 17 responses received. 1 respondent (5.88%) had no views.

Comments included:

- Industry members of the MH S/C Pipelines WG perceive that committee processes are regarded as a “necessary evil” by some HSE representatives;
- HSE involvement in MH S/C Pipelines WG subjected to frequent personnel changes and resource constraints, leading to uncertain constitution and pace;
- Little evidence of ACDS/MH S/C challenging WGs on agenda delivery and the need for assessment of regulatory impact. Without such ownership by ACDS/ MH S/C, not clear how the regulatory processes will develop and thrive;
- Whilst broadly in favour of maintaining the existing structure of committees, this review offers the opportunity to fundamentally rethink how such committees are populated, the basis of appointment, and the responsibilities that go with membership. What is the incentive for the right people to participate?

65 A full breakdown of the responses to question 28, additional comments, is contained in Annex 1A.

Annex 1A

ACDS Review - responses to Question No. 28 - Any other comments?	
Response no.	Response
1	I have made my comments as member of ACDS Explosives S/C. My actual knowledge of ACDS (main) is limited, but answers relate to my perception from my discussions with attendees.
2	My experience of ACDS is via my membership of MH S/C WG on Pipelines & my comments reflect this group's experience. a) Industry members of the group often perceive that such committee processes are regarded as a "necessary evil" by some HSE representatives. HSE attendance allows the "stakeholder involvement" box to be ticked. b) HSE involvement in such a group as MH S/C pipelines WG can be subjected to frequent personnel changes & resource constraints, leading to uncertain constitution & pace. c) I see little evidence of ACDS/MH S/C challenging WGs as to agenda delivery & the need for assessment of regulatory impact. Without this ownership by ACDS/ MH S/C, I am not clear how the regulatory processes will develop & thrive.
3	Publications - if HSE have moratorium is there any point in continuing? "Teeth" - ACDS should be much more critical & have formal means of information gathering, calling on members to present cases etc. "Consensus" - principles will never work in practice - again should be more formal.
4	ACDS must become more forceful & authoritarian - wishy-washy consensus will get nowhere with such complex & technically demanding issues.
5	My responses have been largely confined to Major Hazards S/C. Whether ACDS & its S/Cs continue in their present form is perhaps not the major issue. It is, however, important that a forum exists to provide contact with HSE along with colleagues from other industries to discuss items of common interest.
6	I believe there are important issues to be resolved for pipelines, so WG should remain in existence with continuing support from ACDS.
7	These notes express general ideas stimulated by several of the challenging questions in the Questionnaire, for which answers needed to be co-ordinated & justified more fully than was possible in the boxes. <p style="text-align: center;">The need for A/Cs to be attached to HSC rather than HSE</p> There is an obvious case for the separate existence of most of the Industry Advisory Committees (IACS) because HSC needs to

consult stakeholders in the industry sectors (both duty holders & the bearers of risks) about the proposed regulatory developments. IACs have to be attached to HSC because they mainly resolve contentions between HSE-CBI-TUC that otherwise would swamp HSC's agenda.

ACDS however is designated a "Subject Advisory Committee (SAC) - because dangerous (flammable/explosive) substances arise in many sectors & the topic is therefore generic. There are some stakeholder contentions there (e.g. pipeline safety. LUP, gas safety, petroleum licensing), but the committee also acts as an expert panel for HSE to consult.

The existence of a SAC reporting to HSC would therefore depend on how important was its role in resolving stakeholder contentions, and/or how important the generic topic is to HSC's strategic aims at any time.

I observe that dangerous substances (DS) only appear in HSC's 2010 Strategy as one of the "Continuing Aims" - and only for "preventing catastrophic failures in major hazard industries". Overall, DS are not a high priority for HSC, I think rightly so - because the toll of "ordinary" occupational accidents is much greater cumulatively.

After attempting with difficulty to answer this questionnaire, I have persuaded myself that ACDS contributes more in its expert capacity than it does as a forum for resolving stakeholder conflicts. Therefore, ACDS might become a "topic advisory group" attached to HSE, and in that event should be restructured as a scientific advisory committee rather than a tripartite model. (Stakeholder access would be lost in the process & would have to be taken up elsewhere - e.g. in subordinate WGs.

What about the other SACs? Candidates for merger?

There are other SACs at HSC A/C level, but their numbers have dropped from 7 in 1996 to 4 in 2004. The surviving SACs are:

- ACDS
- AC Toxic Substances (ACTS)
- Occupational Health A/C
- Nuclear Safety A/C – NUSAC

[The other 3 exist as "topic A/Cs serving HSE, & it would be interesting to find out from their members what effect this change of status has had. They are: A/C Dangerous Pathogens; Scientific Committee on Genetically Modified Organisms (Contained Use) A/C Genetic Modification; Ionising Radiations Health & Safety Forum - was IRAC.]

NUSAC is an expert committee, rather than a stakeholder wrangling forum. That is probably because of the public interest aspect of nuclear safety, which means it is not a suitable candidate for the simple IAC formula. NUSAC deserves full HSC A/C status - this is a hugely important risk area with catastrophic potential that has to be watched closely - the nuclear sector rightly has an HSE Directorate all to itself. NUSAC is not a marriage candidate for ACDS.

ACTS deals with generic toxic substance issues, but importantly oversees a scientific function in the regulatory control of toxic substances, by its S/C WATCH setting OELs. It is rather different procedurally, & the expertise is entirely different. I cannot see ACTS & ACDS being merged successfully.

It is possible that ACTS & OHAC would fit together - I don't know much about OHAC, but Occupational Health is a very important topic & central to HSC's Strategic Aims to 2010. One would not want to weaken OHAC in any restructuring (rather the reverse). There is merit in forcing toxicologists & occupational health & hygiene experts into a dialogue (something they might not do naturally!)

Manual handling is a distinct issue within occupational health, & an important one in terms of scale of harm; it needs to be ring-fenced, so it could drop into a S/C. (Or, place it with related areas - ergonomics & human factors - in a new SAC, which I think is needed).

Demoting some of the SACs to HSE "topic advisory group level.

It may be thought that ACDS & ACTS might be both demoted to "topic advisory groups". Perhaps OHAC as well. That would be tidy - only the IACs & the sector-based NUSAC would report to HSC.

But, is it really true that HSC is not concerned with generic topics? I cannot see why that should be the general rule. Let's examine some possibilities:

- There are generic issues surrounding classes of hazard that happen to be ubiquitous, such as DS, TS, ionising radiation & dangerous pathogens - these require primarily expert scientific consideration, but stakeholders may well have an interest in them (pressure groups, unions, industry) & HSC may have to take a view on them because of public concerns.
- There are other generic issues that are to do with accident prevention: human factors, duty holder behaviour, best

practice in risk assessment (a key area where many ordinary duty holders fail lamentably & HSE's guidance is poor), safety management, workforce engagement, competence, safety culture, plus "real world" influences such as insurance, competition, contractor/client relationships, SMEs, legal & enforcement issues, etc. Many key regulations create duties of safety management, which should be instrumental in proactive improvement of safety performance, but where duty holders are currently under-achieving (e.g. the CDM Regulations). It is rich with opportunities.

- These might be considered matters for the HSC itself, but I think that there is so much to know, some of it at an expert level, that HSC would gain from having a consultative/expert A/C to call upon in some or all of these areas. HSE cannot do this alone, because it does not possess sufficient knowledge of how duty holders work and think behind closed doors.

Dealing with the generic hazards first: if the hazard is one with such a high profile or addresses one of HSC's Strategic Aims, then the A/C should remain attached to HSC. Examples: NUSAC, OHAC. Otherwise, if it contributes more in its expert capacity than it does as a forum, it should become a "topic advisory group", attached to HSE, & should be restructured as a scientific A/C, rather than the tripartite model. (Possible examples: ACDS & ACTS).

On the generic issues, mostly to do with safety management practice & individual & corporate behaviour, I think this has been neglected & so there are opportunities for quick gains. More effort would produce results supportive of HSC's 2010 aims, & a new SAC with a remit in this area might well produce initiatives & help HSE develop improved guidance that would help duty holders & employees at all levels to forestall accidents instead of reaching to them.

Fuller engagement of the community of H & S professionals

A final, unconnected point. There is also an opportunity to engage more with the health & safety professional community outside HSE, which is a competent & thoughtful resource with no "side". Health & safety professionals are under-represented in HSE's current advisory structure, because the current recruitment channels encourage stakeholder interest representation, for which they might be unsuited. H & S professionals are generally technically expert in a wide range of H & S subjects, are well-motivated towards improving H & S performance, & are usually independent-minded, whoever, employs them.

8	<p>Do I discern an underlying agenda to dissolve ACDS?</p> <p>The work ACDS currently does is important, but may need additional focus. If the tripartite input could be preserved in other ways, ACDS could be recreated as an expert committee advising HSE on new work. This would allow the committee to have an earlier & less editing role on legislation etc.</p>
9	<p>My concerns arise from my position as a consumer representative - the first on the committee. It sometimes seemed to me that a representative had to be parachuted into the committee from outside the organisation without any clear ideas of how he/she would relate to the substance of the work. Clearly some work within ACDS's remit is of direct relevance to the consumers & the consumer representation is both appropriate & necessary.</p> <p>I do not know how much work of consumer relevance takes place in other A/Cs, but if there is any, I think some structures should be found for cross-fertilisation between consumer reps. across A/Cs. If only ACDS is involved, then I believe that it would be best for the consumer representation on it to grow out of the substance of the work.</p>
10	<p>Whilst broadly in favour of maintaining the existing structure of committees, this review offers the opportunity to fundamentally rethink how such committees are populated, the basis of appointment & the responsibilities which go with membership.</p> <p>What is the incentive for the right people to participate?</p>
11	<p>My comments are from the viewpoint of a member of Explosives S/C. I am always mindful that what we plan in policy, or introduce in legislation needs a "filter" to ensure that what is completed is both fully effective, operable & most of all understandable.</p> <p>ACDS appears to be such a filter, & as long as dangerous substances are within us, the need to keep them & their future developments under review will remain.</p> <p>I find that a narrow review process usually gives rise to missing the obvious!</p>
12	<p>It is for the HSC to require a business plan from each A/C, with a supporting project initiation document, which includes risks/targets/substances etc.</p> <p>Thereafter, A/Cs must achieve & should be empowered to do so. Such empowerment might include seconding 2 or 3 representatives (i.e. CBI/TUC/LGA) on a full-time seconded basis (paid by HSC) to complete a task hence my reference to task & finish groups in question 10a.</p>
13	<p>HSE needs to review its entire position in relation to substances in the context of REACH.</p>

14	<p>Although positive steps were taken to review gas safety regimes through establishment of 5 WGs progress has stalled due to lack of resources, the complex nature of the issues & perhaps not considering a need to review objectives & overall strategy.</p> <p>A fundamental review is always difficult when existing framework limits the potential for lateral thinking.</p>
15	<p>I suspect that it is better to have some meetings rather than rely solely on correspondence in order to facilitate the detection & ratification of misunderstandings & factual errors. Points especially contentious or multi-faceted ones are more easily & quickly conveyed & brought to a conclusion verbally than by correspondence.</p>
16	<p>I suspect that it is better to have some meetings rather than rely solely on correspondence in order to facilitate the detection & ratification of misunderstandings & factual errors. Points especially contentious or multi-faceted ones are more easily & quickly conveyed & brought to a conclusion verbally than by correspondence.</p>
17	<p>With regard to meetings & minutes, I think it would be healthy for dissention to be recorded. I think that minutes should be fuller & reflect such discussion - most minutes of some committees read just like agendas. The minutes of the WGs I sat on did much better in this way. There is an unreasonable fear of disagreement of any kind by HSE committees, which is unrealistic & unhelpful. Agreement is best but eternal agreement is unreal & does not in fact exist, unless people are not entering into the discussions, because they have lost interest.</p> <p>We suspect that appointment to committees is sometimes seen as a perk to allow people to go up to London on expenses & perhaps while receiving a day's pay for this, especially for unions. Perhaps because HSE is overworked & under resourced (or so we believe, although not everyone believes this), a dull meeting means less work for HSE staff. A committee without people or bodies such as CO Gas Safety on board will meet, agree everything & be neat & tidy for the administrators. However, this does not mean that there will be action to prevent unnecessary deaths & injuries.</p> <p>We are very concerned that HSE sees things too much from industry's perspective & is indeed beholden to industry for research & experts because HSE lacks resources employ its own experts or undertake its own research. This is very unsatisfactory.</p> <p>I would like the whole staff in HSC/E, including the Commissioners, to read the full version of Alan Dalton's "Consensus Kills". I was surprised to find that my experiences were virtually identical to his. I felt before reading this that</p>

	<p>perhaps it was my fault that I didn't feel that I was getting anywhere.</p> <p>Without Alan's work, we would not have been able to apply to an open meeting of the ACDS to become a member of the GS S/C. I am horrified that when I sought to relay our victims' problems & experiences to HSC/E so that things could be improved, CO-Gas Safety was treated at best (with one or two notable exceptions) as a bit of a nuisance to be tolerated & at worst, ignored & given the run around.</p> <p>I find it almost unbelievable that HSC/E, which was set up by the Health & Safety at Work Act 1974 has no commissioners who are interested or experienced in dealing with victims of any kind & has no representation by victims. This is indefensible. The consumer representative has no experience of victims & we are often confused by HSE & industry as a consumer organisation. The lack of representation of victims further fails to utilise a valuable resource.</p> <p>I have been very surprised to find that at least 90% of victims, if not 99.9%, do not wish to moan about their tragedies but have common sense suggestions to avoid others suffering as they have suffered. This resource should be recognised and used as soon as possible.</p> <p>To be honest, the whole of HSC/E needs a bit of a rethink & perhaps it would be better if the prosecution part were separated from the education part.</p> <p>I do not want to see the end of HSC/E though, and I am very concerned that this might happen. HSC/E needs political support. It is very difficult to fight industry which often seems to believe that any change will not be for the better. Change has to be imposed by some agreement & co-operation with industry, but the best way could be to get tough with prosecutions first. For example, Fife Council may have had some horrendous CO deaths & injuries, but it impressed me greatly how it dealt with the issue after the prosecution.</p>
18	<p>I consider that ACDS has rested on its laurels for a long time, with members disinterested & apathetic & unable/unwilling to suggest more proactive ways of working.</p> <p>It produces no original work, & members seem disinclined to take an active role - very poor response to HSC's Forward Look & no response to Revitalising Health & Safety Workshop.</p>

Advisory Committee on Dangerous Substances: current membership

Chair - Nick Starling, Co-Director of Policy Group Health and Safety, HSE

Secretary - Colin Potter, Policy Group - Nuclear and Hazardous Installations Policy Division, HSE

Members

Confederation of British Industry (CBI)

Dr Chris Beaton, Acordis
Jim O'Sullivan, Transco
Dr Tom Smith, Davas Ltd
Dr Mike Considine, BP Ltd

Trades Union Congress (TUC)

Mr Tom Mellish, TUC
Alun Owen, UNISON
Paul Woolstenholmes (Fire Brigades Union)

Local Authority

Professor Barbara Mawer, Warrington L.A (LGA)
Ian Shuttleworth, Derbyshire County (LGA)
Councillor Sutton, Isle of Wight Council (LGA)
Assistant Firemaster Brian Sweeney, Strathclyde Fire brigade, HQ

Independents

Dr Tony Cox, Consultant, Risk Management
Dr Mike Hogh, Consultant
Professor Philip Nolan, Department of Chemical Engineering, South Bank University
Professor Gordon Walker, Staffordshire University

Secretariat - Janet Savin, Policy Group - Nuclear and Hazardous Installations Policy Division, HSE

HSE observers

Mr Keith Wilson HID

Observers (other government departments)

Jeff Hart Department for Transport
Jacqui King Ministry of Defence

Liz Surkovic DEFRA Department of Environment, Food and Rural Affairs
Bryan Monson Health and Safety Executive Northern Ireland
Keith Bradley Maritime and Coastguard Agency

Advisory Committee on Dangerous Substances (ACDS) and ACDS subcommittees' terms of reference

Advisory Committee on Dangerous Substances

To consider and advise the Commission on:

- Methods of securing safety by controlling risks to persons at work and related risks to the public connected with the manufacture, import, storage, conveyance and use of dangerous substances (other than those dealt with by the Advisory Committee on Toxic Substances and the Advisory Committee on Safety of Nuclear Installations) as defined from time to time by the Commission;
- Methods of securing health and safety by controlling risks to persons from flammable gas, connected with manufacture, supply transmission, distribution, installation and use, as defined from time to time by the Commission; and
- Other matters referred to them by the Commission or the Health and Safety Executive.

Major Hazards Subcommittee

The Subcommittee shall consider and advise the Advisory Committee on Dangerous Substances:

- on methods of securing health and safety by controlling risks to persons and related risks to the public arising from the manufacture, storage, conveyance and use of hazardous substances;
- on other associated matters referred to it by the Advisory Committee.

Flammable Substances Subcommittee

1 To assist HSE in implementing the aspects of the Chemical Agents Directive relating to safety risks arising from flammable substances.

2 To consider and advise on measures to secure the safety of workers and the public by controlling the risks arising from the storage and use of flammable substances.

3 To consider the repeal or revocation of possibly redundant legislation controlling the storage and use of flammable substances

4 To establish, as necessary, any working groups and to receive periodic reports from those groups.

5 To report regularly to the Advisory Committee on Dangerous Substances.

6 To assist HSE in implementing the proposed Directive on the Protection of Workers Potentially at risk from Explosive Atmospheres.

Explosives Subcommittee

To consider and advise the Advisory Committee on Dangerous Substances and health and Safety Commission on:

- health and safety issues arising from the review of explosives legislation and proposed new Regulations on the manufacture and storage of explosives; and
- other matters referred to them by the Advisory Committee on Dangerous Substances or the Health and Safety Commission.

The appointment of the Explosives Subcommittee will, subject to review by the Advisory Committee, be for a maximum of two years from the date of its first meeting.

Gas Safety Subcommittee

1 To anticipate and respond to developments in the liberalised gas industry, including:

- review of the Gas Safety (Management) Regulations 1996;
- advising on the fundamental review of the gas safety regime applying downstream of the meter;
- providing advice on publicity activities/priorities, especially on carbon monoxide (CO) poisoning.

2 To advise on future arrangements for standards, research and industry guidance.

3 To set up and oversee working groups (as appropriate).

Stakeholder Questionnaire

Name:		
Contact details: Address:	Telephone:	
	E-mail:	
Attribution/representative of which organisation		
Member?	YES	NO
Nature of contact?		
Please tick your answers to each of the questions below, and, where appropriate, add any comments in the column on the right.		
QUESTIONS	COMMENTS	
1 What is your view of ACDS?	Poor	
	Average	
	Good	
	V Good	
	Excellent	
2 How would you view the disbandment of ACDS?	No opinion	
	Should disband	
	Possibly continue	
	Definitely continue	
3 Do you consider the continued existence of ACDS justified?	No opinion	
	Unhappy	
	Sensible	
	Pleased	
	Should be retained	
3a If your answer to Q3. is “possibly continue”, or “definitely continue”, on what basis would you consider its continued existence justified?		
3b If your answer to Q.3 is “should disband” please give reasons/ explain		
4 Do you consider that ACDS contributes to HSC/E’s strategic aims?	YES	NO

QUESTIONS	COMMENTS	
<p>4a If your answer to Q.4 is <u>yes</u>, to what extent does ACDS contribute to HSC/E/s strategic aims?</p>		
<p>4b If your answer to Q.4 is <u>no</u>, how should it contribute to HSC/E/s strategic aims?</p>		
<p>5 Can the tripartite structure of ACDS still be justified?</p>	YES	NO
<p>5a If your answer to Q.5 is <u>yes</u> , please explain why</p>		
<p>5b If your answer to Q5 is <u>no</u>, please suggest alternative ways of working</p>		
<p>6 What do you consider is likely to be the most suitable structure for the committee in future?</p>		
<p>7 What do you consider are the committees' major achievements?</p> <p>Please give specific examples</p>		

QUESTIONS	COMMENTS	
<p>8 What should ACDS aim to achieve in the future?</p> <p>Please give specific examples</p>		
<p>9 Do you consider that ACDS makes a real impact on HSC's decision-making?</p>	YES	NO
<p>9a If your answer to Q.9 is <u>yes</u>, please give examples</p>		
<p>9b If your answer to Q.9 is <u>no</u>, please explain</p>		
<p>10 Can you suggest more viable alternatives ways of working?</p>	YES	NO
<p>10a If your answer to Q. 10 is <u>yes</u>, please give examples</p>		
<p>10b If your answer to Q 10 is <u>no</u>, please explain</p>		
<p>11 Does the work of ACDS need to be done by a full- blown HSC Advisory Committee (A/C)?</p>	YES	NO

QUESTIONS	COMMENTS	
11a If your answer to Q.11 is <u>yes</u> , please explain why		
11b If your answer to Q.11 is <u>no</u> , please suggest alternatives		
12 Do papers relating to legislative proposals for implementing EU Directives need to be discussed by the committee?	YES	NO
12a If your answer to Q.12 is <u>yes</u> , please give reasons		
13 What alternative ways of working can you suggest?		
14 Is there any real value in face to face meetings?	YES	NO
14a If your answer to Q.14 is <u>yes</u> , please give reasons		

QUESTIONS	COMMENTS	
<p>14b If your answer to Q.14 is <u>no</u>, please suggest alternative ways of working</p>		
<p>15 Do you consider that ACDS could/should be amalgamated with another A/C?</p>	YES	NO
<p>15a If your answer to Q.15 is <u>yes</u>, please</p> <ul style="list-style-type: none"> i. explain why; and ii. suggest with which A/C it could be amalgamated 		
<p>15b If your answer to Q.15 is <u>no</u>, please explain why</p>		
<p>16 Is there real value in face to face meetings?</p>	YES	NO
<p>16a If your answer to Q.16 is <u>yes</u>, please give reasons</p>		
<p>16b If your answer to Q.16 is <u>no</u>, please explain why</p>		

QUESTIONS	COMMENTS	
17 What is your view of the value of the contribution of the Explosives Subcommittee to the work of ACDS?	Poor	
	Average	
	Good	
	V. Good	
	Excellent	
18 Is there a continuing need for the Explosives Subcommittee?	YES	NO
18a If your answer to Q.18 is <u>yes</u> , please give reasons		
18b If your answer to Q.18 is <u>no</u> , please explain why		
19 What is your view of the value of the contribution of the Flammable Substances Subcommittee to the work of ACDS?	Poor	
	Average	
	Good	
	V Good	
	Excellent	
20 Is there a continuing need for the Flammable Subcommittee?	YES	NO
20a If your answer to Q.20 is <u>yes</u> , please give reasons		
20b If your answer to Q.20 is <u>no</u> , please explain why		

QUESTIONS	COMMENTS	
21 What is your view of the value of the contribution of the Gas Subcommittee to the work of ACDS?	Poor	
	Average	
	Good	
	V Good	
	Excellent	
22 Is there a continuing need for the Gas Subcommittee?	YES	NO
22a If your answer to Q.22 is <u>yes</u> , please give reasons		
22b If your answer to Q.22 is <u>no</u> , please explain why		
23 What is your view of the value of the contribution of the Major Hazards Subcommittee to the work of ACDS?	Poor	
	Average	
	Good	
	V Good	
	Excellent	
24 Is there a continuing need for the Major Hazards Subcommittee?	YES	NO
24a If your answer to Q.24 is <u>yes</u> , please give reasons		
24b If your answer to Q.24 is <u>no</u> , please explain why		

QUESTIONS	COMMENTS
<p>25 How do you value relative input/contribution of HSE staff v. members</p>	Too much from HSE
	Too much from members
	About right balance
<p>26 How could this be improved?</p>	
<p>27 What other projects can you suggest for further co-operation with other A/Cs, (e.g. ACTS/ACDS Chemical Essentials project)?</p>	
<p>28 Any other comments? Please continue on a separate sheet if necessary.</p>	