

THE SAFETY REPORT ASSESSMENT MANUAL

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STATEMENT FROM THE COMPETENT AUTHORITY

KEY PRINCIPLES

STATEMENT FROM THE COMPETENT AUTHORITY

1. The Safety Report Assessment Manual (SRAM) has been rewritten to take account of reviews of the way in which the assessment process has been working and feedback received from assessors, site operators and other stakeholders.
2. The revised SRAM also takes account of the following developments:
 - A high proportion of assessment work will now be completed on revisions of previous reports.
 - The need to ensure a proportional, risk based approach to assessment and the avoidance of duplication of work
 - The 2005 amendments to the COMAH¹ and CHIP² Regulations have brought a significant number of new sites into scope.
3. The purpose of this note is to endorse important principles set out in more detail overleaf and in the SRAM, in particular:
 - Assessment does not, in itself, ensure that the risks on site have been reduced to ALARP³
 - Keeping to the time limits for the completion of key stages of the assessment process
 - Making only one request for additional information
 - Factual information in the safety report should normally be taken at face value
 - The depth of assessment should be proportionate to the level of risk and the extent to which the information is new.
4. The timely completion of Safety Report Assessments is a top priority for the CA. Safety Report Assessment is just part of the Competent Authority's overall intervention strategy for top tier COMAH sites. It's purpose is to form conclusions on whether the risks from the major hazards on a particular establishment have or have not been reduced to ALARP on the basis of the evidence presented in the Safety Report. It is important to move to site inspection and verification, and/ or to seek revisions to the safety report to ensure major hazards have been reduced to ALARP in practice.
5. All Line Managers of CA staff having Safety Report Assessment responsibilities should ensure their staff have the required training and competence. The relevant HSE Head of Field Unit should be informed of any issues which might compromise the delivery of the Safety Report Assessment Programme without delay. We endorse the new SRAM on behalf of the CA and will give full support to all assessors who observe these principles.
6. The report may describe measures that appear to be seriously deficient for preventing or controlling a major accident. The CA has a duty to prohibit that part of the seriously deficient operation that could lead to a major accident, The CA will visit the site to check whether the measures signposted by the report are actually seriously deficient, before taking action under Regulation 18.

Kevin Myers

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KEY PRINCIPLES

- 1. Assessment does not, in itself, ensure that the risks on site have been reduced to ALARP.** Assessment should be directed towards reaching a conclusion on the evidence presented in the safety report on how the hazards have been identified and assessed and how the control measures have been identified. The assessment process does not examine actual conditions on the site. These can only be tested through inspection and verification. Assessment of reports is just part of the overall intervention strategy for top tier COMAH sites.
- 2. Keeping to the time limits for the completion of key stages of the assessment process.** Once started, the assessment process should be completed within a maximum period of 26 weeks. The process should commence as soon as possible and no later than 26 weeks following the receipt of the report to ensure the process is completed within 12 months. Shorter timescales are set for pre-construction reports and reduced time should also be agreed between assessors where appropriate, for example where revisions to reports are not extensive.
- 3. Making only one request for additional information.** Requests for additional information should be coordinated through the Assessment Manager. The request should only be directed to examples where the operator's demonstration is insufficient or the minimum information required by Schedule 4 is not provided. Information requested should be expected to be readily available such that the operator can provide it typically within four weeks. Where the requested information cannot be provided within the required timescale the assessment team will reach a conclusion on whether a sufficient demonstration has been made and any further supporting information and/or revisions to the report will be progressed through the intervention strategy..
- 4. Factual information should normally be taken at face value.** Assessors should adopt a "good faith" presumption that information contained within safety reports, and obtained through a further information request, is accurate unless there is clear evidence to the contrary (eg conflicting statements in the report or local knowledge on the part of an assessor). Verification of the information is a matter for consideration in the intervention plan.
- 5. The depth of assessment should be proportionate to the level of risk and the extent to which the information is new.** The assessment should be focussed towards consideration of arrangements for identification and assessment of major accident hazards and of the described arrangements and controls in place to prevent or limit their consequences. Assessors should only consider the criteria relevant to the particular safety report on the basis of the description of the site and the identification of the nature and the level of the risk. Assessors should not be seeking a perfect report and should maintain regard for the purpose of assessment within the CA's overall enforcement strategy.

A conclusions letter to the operator that identifies deficiencies in the demonstrations or information in the report does not mean that the CA will take no further action to obtain the necessary information. Further action to provide the required information will form part of a revision plan attached to the conclusions letter to the operator.

Footnotes

1 Control of Major Accident Hazards Regulations 1999 (as amended)

2 Chemicals (Hazard Information and Packaging for Supply) Regulations 2002

3 As low as reasonably practicable