

THE NEW SAFETY REPORT ASSESSMENT MANUAL

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INTRODUCTION

1. The new [Safety Report Assessment Manual \(SRAM\)](#) was published on 28 April and is on the HSE web site. This note is intended for site operators familiar with the current assessment process and highlights the main changes from the previous edition.
2. SRAM describes the methods the Competent Authority (CA) will use to assess safety reports submitted by site operators when required by regulations 7 and 8 of the Control of Major Accident Hazards Regulations 1999 (as amended) (COMAH). The CA is a joint authority comprised of the Health & Safety Executive (HSE) and the Environment Agency (EA) in England and Wales, or the HSE and the Scottish Environment Protection Agency (SEPA) in Scotland.
3. The purpose of assessment is to reach conclusions on the demonstrations made in the safety report against the requirements of the regulations, to make these conclusions known to the operator and to assist the CA in developing an intervention strategy for the major hazard site.
4. The new SRAM was developed following an extensive consultation process within the CA and also with industry. The Chemical Industry Association provided a representative to work on the project board that oversaw the development of the new manual and their support and encouragement is acknowledged. **The CA will use the new manual for all Safety Report Assessment commenced after 1 July 2006.**
5. **SRAM is not intended to provide guidance to operators on writing safety reports.** It has been made publicly available via the HSE/COMAH Website to demonstrate transparency in respect of the assessment process. The new SRAM is not introducing changes to the information and demonstration requirements that should be contained within Safety Reports as set out in COMAH schedule 4 parts 1 and 2 - see paragraphs 13-15 below.

OVERVIEW

6. The manual is introduced by a statement signed by the senior managers representing each part of the CA and includes five key principles that will govern all future Safety Report assessment – see appendix 1. It provides a framework of procedures and guidance to help achieve consistency in the assessment of safety reports. It makes a clear distinction between the assessment of Safety Reports and inspection and verification. Inspection and verification topics are not included in the manual.
7. Most sections are set out in a clear tabular format to help CA staff quickly identify what they need to do. The new SRAM is less than half the length of the previous edition. Repetition, links to other documents and cross-referencing have been kept to a minimum. Roles and responsibilities for the key EA / SEPA posts and guidance on environmental assessment have been included for the first time.

SECTIONS 2 - 6 - PROCEDURES AND ROLES AND RESPONSIBILITIES

8. These sections are set out in a tabular format identifying role, responsibility and task. Line Managers responsibilities are more clearly defined. The procedures are broken down into key elements, procedure and steps (specific

tasks) with a clear identification of who is responsible for completing the task. Supporting guidance is provided in footnotes. Figure 4.1 provides an overview of the assessment process.

9. The most significant changes are:
 - a. Greater emphasis on assessment planning and improved procedures to help assessors avoid duplication of assessment and to work as a team to agree the target agenda.
 - b. Detailed guidance on requests for further information (RFI).
 - c. Reducing the timescale for assessment from 12 months to 6 months. The assessment to be completed within 12 months of receipt of the report from the operator.
 - d. Request for further information should be limited to information that ought to be already available if the necessary demonstrations are to be made, and consequently should be capable of being provided within 4 weeks.
 - e. The assessment will end with the conclusions letter to the operator, normally within 6 months of the start of the assessment process. Outstanding matters will be dealt with after conclusion as part of a revision plan for the Safety Report.
 - f. One set of procedures cover all types of safety report and a proportionate approach will be adopted to their application.
 - g. Assessment will not be regarded as an isolated or "one off" process but part of an overall strategy for COMAH enforcement at the site.

10. Further specific changes include:
 - a. Confirmation that HSE will always provide the Assessment Manager (AM), the usual first point of contact for site operators, but EA/SEPA will lead the assessment where the major accident hazards are predominantly or wholly environmental.
 - b. Recognition that a full assessment team will not be needed in every case, particularly for assessment of revisions to existing reports.
 - c. An increased expectation that an assessment planning meeting, particularly in the case of initial submissions and major revisions, will be held.
 - d. An optional initial assessment by predictive assessors has replaced the formal early predictive screen. The AM will consult with the predictive assessor on the need for an initial assessment.
 - e. Use of the Enforcement Management Model (EMM) by HSE assessors to decide the appropriate enforcement line.
 - f. An IN will **not** now be served to require further information as only 4 weeks should be allowed for its provision and the assessment team will then reach their conclusions.
 - g. Further information can be collected (or at least discussed) at a meeting with the operator, where this is considered the most efficient method but information collected in this way will still form part of the Safety Report documents and should be logged and coordinated by the AM.
 - h. The Assessment team conclusions record has been revised to emphasise team decision making through the assessment outcome meeting to achieve an effective conclusion of assessment, particularly where it is concluded the demonstrations have not been made.
 - i. Clear confirmation that, where further information is not provided within 4 weeks and/or demonstrations are not made, the revision plan to require improvements to the safety report is key to bringing assessment to a close.

- j. Plans and resources will need to be put in place to assess the products of the revision plan, using the procedures in whole or part as appropriate.
11. Other changes to procedures have arisen out of the need to make them applicable to assessment of revisions as well as initial submissions and include:
- a. The term “safety reports” is used throughout, and includes full safety reports and all other documents requiring assessment, such as revised reports and revisions submitted in the form of changed pages or appendices and documents submitted following the single request for further information.
 - b. The CA will not always require 9 copies of the report/document plus the original now as revision assessment may not always involve a full assessment team.
 - c. The old SRAM advises the AM to ask the operator whether they wish to have copies of the report returned or destroyed on conclusion of the assessment. The new SRAM recognises that multiple copies of the original may be needed again in the future, to enable assessment of revisions submitted in the form of changed pages or appendices.

SECTIONS 7 – 14 - ASSESSING THE CRITERIA AND PROPORTIONALITY

12. The manual contains a new Section 7 on proportionality and setting the target agenda to provide guidance on the way in which the assessment team will reach decisions on these important topics. Assessors will adopt a proportionate approach and use their professional judgement to decide the extent of assessment required in particular cases. Greater use will be made of target agendas in order to ensure proportionality and targeting of assessment.
13. All the criteria and criteria sections have been re-numbered. There is no longer a Part 1 and Part 2 of the manual to achieve greater integration. **SRAM is not introducing changes to the information and demonstration requirements for Safety Reports as set out in COMAH schedule 4 parts 1 and 2.** However minimal changes have been made to the wording of individual criteria for the following reasons:
- a. Changes required to reflect the COMAH (Amendment) Regulations.
 - b. A few minor changes to remove ambiguity in the existing criteria.
 - c. Wording that referred to issues more properly covered during inspection and verification has been removed.
 - d. Criteria on environmental assessment have been included but they do not change the way in which the environmental assessment is completed. Only new or revised information will normally be assessed against these criteria.
14. No changes have been made to the Safety Report Assessment Guidance and other detailed technical guidance for particular assessor disciplines currently available on the relevant web/intranet sites.
15. All criteria and supporting guidance has been set out in a standard tabular format listing the criterion with guidance on information which may be expected alongside. The guidance is to be regarded as an aide memoir to technically experienced assessors and not a detailed ‘must do’ list for all assessments. The more significant changes and additions to the guidance on the use of the criteria are:

- a. Guidance in sections 8, 12 and 13 and changes to the way the procedures are set out are intended to avoid duplication of assessment.
- b. Clearer guidance on the type of information to be requested in requests for further information (RFI), including two worked examples of RFI.
- c. Clearer guidance on the action to take when the report describes measures that **appear to be** seriously deficient and require to be followed by a site visit.
- d. Clearer guidance on how to conclude the assessment and develop revision plans where necessary.
- e. Discipline specific guidance has been provided on process safety, mechanical engineering, control and instrumentation and human factors (HF) in Section 12.
- f. In addition to the discipline specific guidance in Section 12, HF guidance has been integrated across all criteria with an expectation that all assessors will consider HF issues within their topic areas.
- g. Appendix 2 in Section 13 identifies the other criteria environmental assessors should consider from an environmental point of view.

CONCLUSION

Site operators seeking further information should look at the [full version of the manual](#) which can be found on the HSE web site.

APPENDIX 1

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.