

<b>Health and Safety Executive</b>		<b>Operational Circular</b>	
		<b>OC 212/1 Supplement 1</b>	
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Target Audience  
All HSE Inspectors

## THE HEALTH AND SAFETY (SAFETY SIGNS AND SIGNALS) REGULATIONS 1996 (SI 1996 No 341)

### LABELLING OF PIPES

This Supplement to OC 212/1 clarifies the position in respect of the labelling of pipes particularly in the process industries

#### Background

1 Several queries have been raised in respect of the requirement to label pipes carrying dangerous substances particularly within the process industries. HSE Guidance Booklet L64, *Safety signs and signals* (file 212) paras 45-49, if read in isolation, give an impression that visible pipes in the workplace containing or transporting dangerous substances will, in general, need to have signs or labels fixed to them. Paragraph 49 gives examples of where signs or labels could usefully be used. For example at sampling or filling points, drain valves and flanged joints which are likely to need periodic breaking. The guidance further advises that labelling should be considered at intermediate points on long pipe runs.

2 If read out of context, the wording of these paragraphs could be interpreted as placing a very onerous duty on the occupier of a chemical complex. However, the Health and Safety (Safety Signs and Signals) Regulations 1996 (Safety Signs Regulations) reg.4 only requires safety signs to be provided where the risks to employees cannot be avoided or adequately reduced by other means. Paragraph 13 of L64 gives advice as to when safety signs are needed and refers to the outcome of the risk assessment made under the Management of Health and Safety at Work Regulations 1999 reg.3. **If the risk is not significant there is no need to provide a sign.**

#### Precautions

3 Within the chemical manufacturing and other industries a number of controls and procedures are available to employers. These include:

- (1) conveying dangerous substances within completely enclosed high integrity systems;

- (2) colour coding of pipes to indicate the contents of the pipe and/or the category of danger;
- (3) effective safe systems of work including isolation and decontamination of plant and detailed permit to work systems to deal with work on and around pipes; and
- (4) effective training procedures which ensure all employees are aware of the risks and controls required.

### **Action by inspectors**

4 If inspectors consider employers have taken sufficient steps to avoid residual risks to employees by using a combination of the control of methods mentioned in para 3 and/or other control methods, there is no need for employers to label pipes as described in the Safety Signs Regulations Schedule 1 Part III.

5 There may be particular locations or situations where labelling as described in Schedule 1 Part III is required, notwithstanding the high level of control provided by other means. Possible examples include:

- (1) locations where there are numerous pipes in close proximity conveying different dangerous substances, particularly if they have different hazardous properties;
- (2) sampling or filling points and drain valves, particularly where they are located in close proximity to similar points for other pipes conveying dangerous substances; and
- (3) where there have been significant, or on-going, alterations or additions to original pipe runs.

6 Inspectors should be aware that the relevant industry associations for the oil and chemical industry have been advised of the interpretation of the Regulations as described above. Changes to the wording, particularly para 45 of L64, will be introduced when it is reprinted to emphasise the link to reg.4(1).

### **Annotation of instructions**

7 OC 212/1 - note "See OC 212/1 Supplement 1".

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**ASI headings**

Fire: Health and Safety (Safety Signs and Signals) Regulations 1996: labelling: pipelines: safety signs.

