

# HID Targeting & Prioritisation

## Arrangements for Prioritising Major Hazard Interventions in the onshore Gas & Pipelines sector

### Purpose

This document sets out the arrangements for prioritising major hazard interventions in the onshore gas and pipelines sector in support of the [HID Regulatory Model](#) and the [HID Principles](#).

### Scope

These arrangements apply to operators of onshore pipelines and gas networks. ED5 Gas & Pipelines contributes separately to the ED Offshore arrangements for prioritising interventions of offshore installations and operators and to the HID COMAH intervention prioritisation arrangements.

### Major Hazard Inspection Programme

Properly prioritising interventions is a high priority for HID in ensuring it delivers its major hazard strategy whilst supporting businesses to grow.

HID's Energy Division Gas & Pipelines Unit aims to ensure its regulatory activity is proportionate to the risks to people, taking into account the operator's performance in controlling risks. This means that ED Gas & Pipelines will inspect higher hazard operators with poorer performance more frequently and in greater depth than operators where it perceives risks to be better managed.

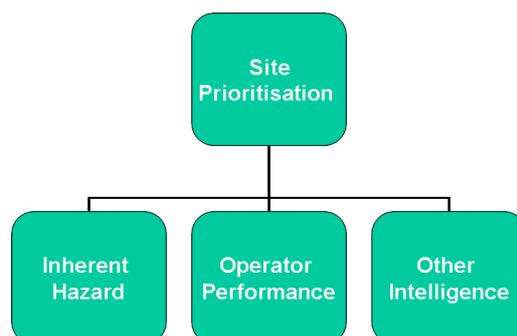
HSE's policy is to conduct inspections in accordance with the [Enforcement Policy Statement](#), applying the principles of the [Enforcement Management Model](#) to regulatory decision making.

ED Gas & Pipelines will develop its onshore major hazard intervention programme to deliver the priorities set out in its sector strategy and secure compliance with the Gas Safety Management Regulations 1996 (GSMR), the Pipelines Safety Regulations 1996 (PSR) and other relevant legislation. This programme will ensure ED Gas & Pipelines meets its core principles by:

- Going to the right places
- Doing the right things
- Finishing what we start
- Leaving a clean record of what we have done

### Site Prioritisation Methodology

ED Gas & Pipelines will prioritise which operators it inspects based on inherent hazards, operator performance and other intelligence.



## Inherent Hazard

ED Gas & Pipelines will assign an inherent hazard score to all operators in the onshore gas & pipeline sector. The score is a numerical representation of the hazards inherent to that dutyholder's operation, and comprises a number of elements. It is evidence based, objective and derived from certain 'unchanging' features about their operation and population at risk.

Inherent Hazard scores for gas network operators are based on the total length of the network and whether that network contains any length of iron mains subject to mandatory decommissioning under the iron mains risk reduction programme (IMRRP).

<b>Inherent Hazard = (length factor) x (material factor)</b>				
<b>Network</b>			<b>Material</b>	
Length (km)	Factor	Example	Contains Iron	Factor
> 100,000	x 30	Grouped gas distribution networks	No	x 1
20,000 - 100,000	x 15	Single gas distribution networks, National Transmission System		
50 - 20,000	x 10	Independent Gas Transporters and MOD	Yes	x 2
< 50	x 5	Small gas networks (e.g. Universities, London Boroughs, power stations)		

Intrinsic hazard scores gas network operators are expected to change only when there are significant changes in the length of the network or when all iron mains subject to mandatory decommissioning under the IMRRP within a network have been decommissioned.

Inherent Hazard scores for onshore pipeline operators are based on the total length of pipeline operated and whether that pipeline conveys flammable and/or toxic fluids and whether it is defined as a Major Accident Hazard Pipeline (MAHP) under PSR.

<b>Inherent Hazard Score = (length factor) x (flammability + toxicity + MAHP)</b>							
<b>Pipeline</b>		<b>Flammability</b>		<b>Toxicity</b>		<b>MAHP</b>	
Length (km)	Factor						
>1000	x 5	Non Flammable	+ 0	Non-Toxic	+ 0	No	+ 0
100 - 1000	x 4						
11 - 100	x 3	Flammable	+ 2	Toxic	+ 4	Yes	+ 4
1 - 10	x 2						
< 1	x 1	Highly Flammable	+ 4				

Intrinsic hazard scores for onshore pipeline operators are expected to change only when there are significant changes in the length or pressure of pipeline operated or changes in the fluid conveyed by the operator.

## Operator Performance

ED Gas & Pipelines will assess operator performance on a range of factors, including:

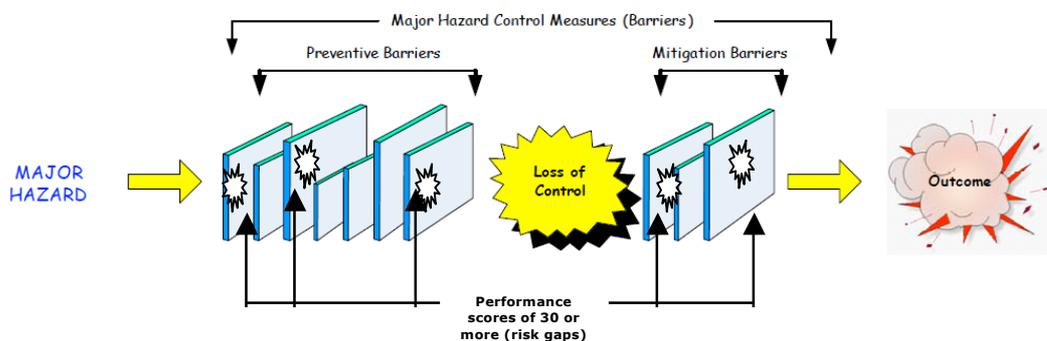
- Performance against strategic inspection topics
- Enforcement history, including recent enforcement notices and prosecutions
- The number and extent of non-compliance issues raised by ED Gas & Pipelines at inspection, assessment or investigation
- The nature and extent of RIDDOR notifications and GSMR incident reports
- The operator's own performance information (such as mature and reliable major hazard safety performance indicators)
- The effectiveness of the operator's verification schemes

The table below provides the generic performance standards, description and score. Operators will be scored on their performance following interventions on strategic topics. The performance score reflects the operator's degree of compliance on that issue, is based on the [EMM](#) risk gap and expressed as a numerical value as described below.

EMM RISK GAP					
EXTREME	SUBSTANTIAL	MODERATE	NOMINAL	NONE	NONE
TOPIC PERFORMANCE SCORE					
60	50	40	30	20	10
Unacceptable	Very Poor	Poor	Broadly Compliant	Fully Compliant	Exemplary
EMM INITIAL ENFORCEMENT EXPECTATION					
Prosecution / Enforcement Notice.	Enforcement Notice / Letter.	Enforcement Notice / Letter.	Letter / Verbal warning.	None.	None.

ED Gas & Pipelines have published strategic topic inspection guides and other web-based information to describe the criteria against which Inspectors judge operator performance.

Performance scores of 30, 40, 50 or 60 against individual inspection topics represent a risk gap in the operator's preventative or mitigation barriers, which depending on the circumstances may mean a complete loss or a degradation of a barrier(s). ED Gas & Pipelines will consider the nature and extent of the risk gap, including the underlying causes, in judging the operator's performance score for each topic.



Inspectors with responsibility for managing an operator's Intervention Plan will determine the performance score, having applied the principles outlined in HSE's [Enforcement Policy Statement](#) and [Enforcement Management Model](#), and, where relevant, will do so in consultation with relevant topic specialists.

## **Other Intelligence**

ED Gas & Pipelines will use other intelligence, in addition to inherent hazard and operator performance, to prioritise interventions. This will include:

- Professional judgement of regulatory and specialist inspectors
- More than 3 elapsed years since the last inspection
- Whether ED Gas & Pipelines has already planned an intervention under complementary legislation (such as a PSR inspection of a GSMR operator)
- Strategic importance of the operation to:
  - GB energy supplies (including whether the dutyholder has a significant role in preventing or minimising a network or local gas supply emergency)
  - GB defence interests
- Adoption or development of new and emerging technology by the operator
- Issues of national importance, for example in support of Government policy

## **Intervention Planning**

ED Gas & Pipelines will use the prioritisation methodology to inform its annual intervention planning and to decide where to commit inspection resources in the following year starting, 1<sup>st</sup> April. By categorising operators into inspection categories of either A, B or C, ED Gas & Pipelines will use this methodology to determine the extent and depth of inspection resource allocated to each operator. Typically, this will mean that operators categorised as:

- A - will be prioritised for inspection in the following year
- B - will be prioritised for inspection within the next three years
- C - will not be prioritised for inspection and will only be visited in response to an incident or complaint

ED Gas & Pipelines will only develop intervention plans for those operators it plans to inspect in the following year and will discuss and share annual intervention plans with those operators and employee representatives prior to the start of that workyear.