

Examples of Operator activities in scope of the Framework

These examples have been provided by industry to support operators understanding of the framework. They are not intended to be comprehensive, and COMAH operators can demonstrate their performance in other ways. However, the examples below will hopefully illustrate the type of activities that fall into scope of the framework. As such, other schemes or initiatives may be equally applicable and operators should take the opportunity to discuss these with their COMAH Intervention Manager or other CA inspectors.

the Competent Authority



Third party performance information/inspection – CDI - T

The Safe storage and handling of bulk liquid chemicals and fuels (and associated major hazard risks) is directly related to the management and operational standards of a terminal. One comprehensive way that companies can demonstrate that they are in compliance with industry best practice is to engage a suitably independent third party to carry out detailed inspections and assessments against the latest standards.

The Chemicals Distribution Institute (CDI) provides the chemical industry with an independent organisation for training, qualification and accreditation of inspectors and a web site database on which inspection reports can be listed, managed and accessed. The purpose of CDI-T is to improve the safety and quality performance of terminals used for the storage of bulk liquid chemicals. The CDI-T scheme administers a terminal inspection system using a standardised global format to address this issue in the most consistent and cost effective way.

The Objectives of CDI-T are:

- To improve the safety and quality performance of bulk liquid storage for the chemical industry.
- To provide chemical companies with a cost effective system for risk assessment, thus assisting in the commitment to Responsible Care and the Code of Distribution Management Practice.
- To provide the chemical industry with an independent organisation for training, qualification and accreditation of inspectors, and databases on which inspection information can be promulgated.
- To provide a single set of accurate, reliable and consistent inspection data which chemical companies can use with confidence.

The availability of the inspection information reduces the necessity for interested parties to undertake individual detailed inspections of the terminal. The inspection format provides detailed status of the management and operational standards in place.

The inspections can only be conducted by inspectors who have been trained and accredited by CDI-T. CDI-T use an accredited process with objective criteria. All inspectors contact details are listed on the web site.

The terminal/company concludes a corporate agreement with CDI-T, whereby CDI-T agrees to retain the terminal inspection report on the database and make it available to chemical company participants, subject to the approval of the terminal company. The inspection reports remain on the database for a period of 36 months, after which time the report is archived.

On instruction of the terminal company, reports can be released to non-chemical company parties with legitimate interests in the inspected terminal.

To enable the CA to take full account of the management and operational standards relevant to major accident hazard control comply with relevant standards, companies will need to release the audit to the HSE and be able to show:

- The CDI-T audit has been completed and appropriate improvement action plans have been developed
- The sections of the CDI-T audit which cover management systems and controls directly related to controlling major hazard risks are in compliance.

Where a duty holder can demonstrate that all of these elements are in place and that the relevant standards have been effectively implemented and managed in the organisation, the regulator may be able to reduce the depth or scope of the inspection of these elements of the management systems that would otherwise be necessary.

Recognising Competence in Process Safety Leadership, Management and Operations – PSM Training

Effective process safety management needs to start at the Leadership level in an organisation, but also to be recognisably provided at other management and operational levels. One comprehensive way companies can achieve and demonstrate this is by adopting the Process Safety Management Project (PSM Project) standards-based approach. PSM Project is a partnership approach started in 2011 and involving industry (both Industry Associations and some COMAH companies), HSE representing the CA, Trade Unions, and the Skills bodies Cogent and the National Skills Academy. Standards have been developed for 3 key job roles – Process Safety Leadership for Senior Executives (PSL); Process Safety Management Foundations (PSMF); and Process Safety for Operations and Operators (PSMO). The National Skills Academy, on behalf of the PSM Project, arranges flexible accredited training, which meets the industry-led Standards developed in each of these areas.

While it is neither compulsory nor necessary for companies to take all 3 levels, as companies may already have alternative arrangements in place, the Standards and courses are designed to give maximum benefit when each level in an organisation undertakes the same consistent approach. Furthermore the PSM Project approach does not rely simply on the training, and requires companies to produce action plans, to review their implementation of effective process safety management, and to have a structured framework for in-house training of operator and maintenance staff.

To demonstrate that competence in process safety leadership, management and operations is being achieved and effectively managed by the PSM Project and National Skills Academy approach, companies will need to be able to show:

- Senior leaders have attended the PSL level course, developed personal action plans on how the learning will be implemented in the organisation, and are taking an active role in managing process safety and demonstrating best practice leadership principles;
- Managers with responsibility for day to day process safety management have attended the PSMF level course and are administering the range of process safety management elements expected, including process safety improvement plans, appropriate performance indicators, asset integrity management, and risk assessment of safety critical plant, equipment and processes;
- For operational staff including maintenance functions, companies have in-house training arrangements such as the PSMO framework and are delivering, recording and monitoring process safety training for all relevant staff.

Where a duty holder can show that all of these elements are in place and that process safety is being effectively implemented and managed in the organisation, the regulator may be able to reduce the depth or scope of the inspection of these elements of competence and process safety management that would otherwise be necessary.

Third party performance information/inspection - SQAS

The safe storage, handling and transportation of chemicals and chemical products (and their associated major hazard risks) is directly related to the management and operational standards of a company. One comprehensive way that companies can demonstrate that they are in compliance with industry best practice is to engage a suitably independent third party to carry out detailed assessments against the current standards.

The Cefic SQAS (Safety & Quality Assessment System) is a pan-European system to evaluate the quality, safety, security and environmental compliance of Logistics Service Providers and Chemical Distributors in a uniform manner using modular standardised assessments carried out by independent qualified and trained assessors using standard questionnaires. Assessments are undertaken at individual sites and company offices where necessary, and are valid for three years at which point a re-assessment is carried out.

The SQAS assessment results in a detailed factual compliance report leading to an improvement plan. The system provides useful feedback directly to the assessed company on the strengths and weaknesses observed during the assessment. Following the assessment, the assessed company will then develop an Improvement Action Programme. This programme can be updated at any time during the three-validity period of the assessment report, such that it can be viewed by all authorised users.

The SQAS Assessors

The assessments are undertaken by professional assessors with both current Lead ISO auditor status and a Dangerous Goods Safety Advisor Transport qualification. The assessors are all trained and accredited by Cefic and periodically retained when the questionnaires are updated.

Assessment Reports

Chemical companies use these assessments for Risk Management in support of their product stewardship activities. The reports provide useful information on the compliance strengths and weaknesses observed during the assessment and the commitment to the industry Responsible Care programme. The reports are stored in a central database with access to authorized persons only.

To enable the CA to take full account of the management and operational standards relevant to major accident hazard control and compliance with relevant standards, companies will need to:

- Provide the CA with the sections of the SQAS/ESAD assessment which cover management systems and controls directly related to controlling major hazard risks are in compliance.
- Demonstrate where it relates to the intervention plan i.e how the COMAH establishment manages and controls the risks arising from the major accident hazards relating to the inspection:
- The SQAS/ESAD assessment has been completed and appropriate improvement action plans have been developed and are being implemented

Where a duty holder can demonstrate that all of these elements are in place and that the relevant standards have been effectively implemented and managed in the organisation, the regulator may be able to reduce the depth or scope of the inspection of these elements of competence and process safety management that would otherwise be necessary.