

14 EMERGENCY RESPONSE ASPECTS OF SAFETY REPORT ASSESSMENT

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1. INTRODUCTION

- 1.1 This guidance is for assessors completing the Emergency Response assessment and is relevant to all types of safety report.
- 1.2 All Emergency Response assessments must use the criteria and guidance set out in Appendix: 14.1 '*Emergency Response - Assessment Criteria and Guidance*'.
- 1.3 Emergency response assessment must be recorded on the form SRAM 16 '*Emergency Response - Assessment Record*'.
- 1.4 The criteria are designed to follow in sequence the specific requirements set down in Schedules 2 and 3 of the 2015 COMAH regulations and to reflect relevant purposes set out in Regulation 8 of the same regulations. These are minimum legal requirements and are clear and enforceable (Regulation 9).
- 1.5 **Assessment criteria and guidance for Emergency Response aspects of a safety report have been revised for SRAM 2015.**

The key objectives in making the changes have been:

- a. To ensure the assessment criteria take account of new content requirements for COMAH 2015 safety reports;
- b. To remove duplication where it previously existed; and
- c. To add clarity in terms of what the assessor should consider when they carry out assessment of Emergency Response aspects.

Duplication has been removed by rationalising and merging criteria that were previously separate but strongly related, or in some cases by removing aspects that are already subject to more in depth assessment by a different assessment discipline – for Emergency Response the other discipline is usually Environment.

This means a change to the numbering of Emergency Response assessment criteria. For more detail, refer to Appendix 14.2 - '*Emergency Response - Changes to Assessment Criteria*

and Guidance', which maps the change in criteria numbering and describes in broad terms the reasons for adjustments in specific criteria.

- 1.6** Demonstrations should be proportionate to the hazard and risks of identified major accident hazards. This aspect can only be decided by an operator when all the elements of Schedules 2 and 3 have been determined. The determination of proportionality is an iterative process for both the operator and assessor.

1.7 Use of Assessment Criteria

The criteria will be applied by a competent assessor against the content of the safety report. In this context, a competent assessor will have a good understanding of the safety report assessment process, its place within the HID Regulatory Model and of any stated benchmarks.

- a. Criteria will be **“met”** when all relevant items are included in descriptions and the necessary supporting information has been provided;
- b. Criteria will be **“not met”** when all relevant items are not included in descriptions or the necessary supporting information has not been provided;
- c. Criteria will be **“not relevant”** when they are not relevant to the establishment;
- d. Criteria will be **“previously met”** when the previous assessor recorded the criterion as “met”.

2. RELEVANT REQUIREMENTS OF THE COMAH REGULATIONS 2015

- 2.1** Regulation 8 states that every operator of an upper tier establishment must prepare a safety report for the purposes of demonstrating that:

8(b) the major accident hazards and possible major accident scenarios in relation to the establishment have been identified and that the necessary measures have been taken to prevent such accidents and to limit their consequences for human health and the environment; and

8(d) that an internal emergency plan has been prepared in accordance with regulation 12, which includes sufficient information to enable an external emergency plan to be prepared.

- 2.2** Regulation 11(1) states that every internal emergency plan and external emergency plan prepared for the purposes of the COMAH Regulations must have the following objectives:

- (a) containing and controlling incidents so as to minimise the consequences, and to limit damage to human health, the environment and property;*
- (b) implementing the necessary measures to protect human health and the environment from the consequences of major accidents;*
- (c) communicating the necessary information to the public and to the services or authorities concerned in the area; and*

(d) providing for the restoration and clean-up of the environment following a major accident.

[Note: where the regulations specifically reference the 'environment' the relevant aspect is considered by environmental regulators using 'Section 13 Environmental Assessment Criteria'; for example 2.2(d) would be assessed by an environmental assessor.]

- 2.3** Regulation 12 (1) requires every upper tier operator to prepare an internal emergency plan, specifying the measures to be taken inside the establishment, and Regulation 12(4), that plan must contain the information specified in Part 1 of Schedule 4. The operator must consult certain persons and organisations in preparing an internal emergency plan (Regulation 12(5)). The operator must at suitable intervals not exceeding three years (a) review and, where necessary, revise the internal emergency plan; and (b) test the plan (Regulation 12(6)).
- 2.3** Schedule 2 (2)(e) states that in relation to planning for emergencies the following matters must be addressed by the safety management system:
- (i) the adoption and implementation of procedures to identify foreseeable emergencies by systematic analysis;*
 - (ii) the preparation, testing and review of emergency plans to respond to emergencies and the provision of specific training for staff, such training to be given to all personnel working in the establishment, including relevant subcontracted personnel;*
- 2.4** Schedule 3 (6) states the minimum information to be included in the safety report for measures of protection and intervention to limit the consequences of a major accident:
- (a) a description of the equipment installed in the plant to limit the consequences of major accidents for human health and the environment, including for example detection/protection systems, technical devices for limiting the size of accidental releases, including water spray; vapour screens; emergency catch pots or collection vessels; shut-off valves; inerting systems; and fire water retention;*
 - (b) the organisation of alert and intervention;*
 - (c) a description of mobilisable resources, internal or external; and*
 - (d) a description of any technical and non-technical measures relevant for the reduction of the impact of a major accident.*

3. GENERAL APPROACH TO EMERGENCY RESPONSE ASSESSMENT

- 3.1** The HSE Regulatory Inspector usually undertakes assessment of Emergency Response aspects. The main focus of the assessment is on the extent to which the safety report is able to show that an internal emergency plan has been prepared that is proportionate to the possible major accident scenarios for the establishment concerned and for which the necessary measures have been taken to limit their consequences for human health and the environment.

It is not about assessing the internal or external emergency plans.

3.2 It should be noted that some aspects of the emergency response are subject to assessment by Environment Assessors, who do so using separate criteria and guidance.

3.3 Use of examples in the Safety Report

There is no requirement for operators to include a copy of either the internal or external emergency plans in their safety report. The operator should determine the level of information to be provided in support of a demonstration or requirement in Schedules 2 and 3 for the emergency response. Where necessary, some operators choose to assist their demonstrations by summarising a specific procedure and providing an example of related documentation in support of it.

4. BENCHMARKS

4.1 In relation to the assessment of emergency response aspects, the assessor should understand the requirements of: COMAH Regulations 8, 11, 12 and 13; Schedules 2, 3 and 4; and the associated guidance in L111.

5. PROPORTIONALITY

5.1 The emergency response assessment should take into account the wider Schedule 3 safety report content. In doing so, the assessor can better understand what constitutes an appropriate emergency response for a given establishment and therefore, what is reasonable in terms of assessment proportionality.

6. PRE-CONSTRUCTION AND PRE-OPERATION SAFETY REPORTS

6.1 Pre-Construction Safety Reports (PCSRs) should describe emergency response arrangements to the extent that information is available and in relation to the major accident hazards at the establishment. Relevant content may include but is not limited to:

- *Control and limitation of escalation of major accidents, including isolation and removal of inventories;*
- *Communication during emergency response;*
- *Emergency control centres;*
- *Access routes;*
- *Design and construction of mobilisable resources, particularly nearer pre-operation stage;*
- *Arrangements during phased commissioning of plant.*

Training in emergency response, testing of emergency plans, and provision of information for the external emergency plan is more relevant to Pre-Operation Safety Reports (POSRs).

6.2 Where there are gaps in emergency response content for a PCSR it may be acceptable and pragmatic to allow the information to be provided in the POSR submission.

6.3 The operator should be able to provide a POSR that meets the relevant emergency response requirements of the COMAH Regulations.

7. POTENTIAL SERIOUS DEFICIENCY AND SIGNIFICANT OMISSION

7.1 Examples of potential serious deficiencies (as described in the safety report) include but are not limited to:

- (i)** The internal emergency plan arrangements are not linked to the foreseeable major accident scenarios which could occur at the establishment.
- (ii)** Inadequate description of the key elements for internal emergency response taken as a whole i.e. preparation, testing, review, training and mobilisable resources.

7.2 Significant omissions in the content of the safety report may include:

- (i)** Failure to describe the arrangements for training staff in the duties they will be expected to perform in implementing the internal emergency response.
- (ii)** Failure to describe the arrangements for providing early warning of an incident to the local authority responsible for setting the external emergency plan in motion.

Appendix: 14.1 - 'Emergency Response - Assessment Criteria and Guidance'

TECHNICAL CRITERION	GUIDANCE
Emergency Response Arrangements (ER)	
<p>14 .1 Consultation The safety report should confirm that the operator has consulted the following in the preparation of the internal emergency plan: Those persons working in the establishment, the appropriate agencies, (e.g. Environment Agency, SEPA, NRW) the emergency services, the health authority & the local authority. Regulation 8d and 12(5)</p>	<p>A statement confirming who has been consulted in the preparation of the plan should be given along with a brief description of the means and nature of the consultation. The report should also include details of any impact that this may have had on the emergency planning arrangements.</p> <p>[In England, the operator must also consult the National Health Service Commissioning Board and Public Health England.]</p>
ORGANISATION OF ALERT AND INTERVENTION	
<p>14.2 The safety report should describe the organisation of the alert and intervention in the event of a major accident to show that the necessary measures have been taken on-site. Schedule 3 para 6</p>	<p>To meet this criterion, the safety report should show basic organisational information, which should include:</p> <ul style="list-style-type: none"> • a description of how communications will be established and maintained during the emergency response; • the nature and location of: emergency control centres; first aid centres; emergency refuges; muster points; pre-defined forward control points, along with any identified secondary, back up locations; • the arrangements for raising the alert to individuals on site, the general public and, where relevant, neighbouring establishments and downstream water abstractors; • a description of the type of alarms and how they are activated; • the roll call and search and rescue arrangements; • the expected intervention in an emergency situation including the initial actions required both on-site and off-site in response to alarms / warnings and the prevention of domino effects; • details of how wind speed and direction and other environmental conditions will be monitored; • the nature of, and arrangements for maintaining any mutual aid agreements with neighbouring establishments; • the nature and location of any installations which may require special protection or rescue intervention; • the location of, access routes for emergency services, rescue routes, escape routes and any restricted areas;

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	<ul style="list-style-type: none"> • the arrangements for dealing with areas of the establishment which are unmanned, not continuously manned, or with varying manning levels at different times; • the evacuation arrangements and any transport requirements. <p>Typically some operators provide a plot plan of key locations such as the emergency control centre, toxic refuges, muster points, pre-defined forward control points, secondary back up locations, access routes, escape routes or restrictions, key installations which may require special protection or additional measures.</p>
DESCRIPTION OF MOBILISABLE RESOURCES	
<p>14.3 The safety report should describe the on-site and off-site resources which can be mobilised by the operator to show that the necessary measures have been taken to limit the consequences of a major accident to people and the environment Schedule 3 para 6</p>	<p>This criterion is considering the adequacy of the equipment selected to limit the consequences of the foreseeable major accident hazard scenarios identified elsewhere in the report. The operator should provide sufficient detail to show that the mobilisable resources which may be relied upon are fit for purpose. Where applicable the report may show:</p> <ul style="list-style-type: none"> • an example of an emergency pre-plan which has been drawn up in accordance with The Energy Institute (EI) Part 19 – ‘Fire Precautions at Petroleum Refineries and Bulk Storage Installations’, or similar; • the estimated amount of water or foam needed to mitigate the consequences of a major accident scenario and confirmation that this can be achieved in practice; • the timescale in which the equipment will be available for use; • that the equipment can function effectively in all expected environmental conditions and if there is a loss of utilities or similar; • the use of PPE such as BA kits, respirators, chemical suits and other protective clothing has been identified and the amount of each has been determined and is available; • that the fire fighting roles of the on-site personnel are complementary to the role of the off-site emergency services; • adequate consideration has been given in the design (e.g. the positioning of walls, fire screens) to assist the positioning and protection of fire fighting equipment and personnel; • the reach of the fire protection and extinguishing equipment is appropriate; • adequate consideration has been given to flammable substances being carried with fire water and spreading the fire to other areas, this should include details of any potentially incompatible substances and any additional mitigatory measures in place to limit the consequences of a major accident hazard; • suitable and sufficient portable and mobile fire fighting equipment (such as mobile monitors, mobile pumps, hand / portable extinguishers foam generation equipment, hoses and hydrants) have been located at appropriate points throughout the establishment according to the hazard.

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	<p>There is no requirement to show this information for all identified scenarios. Some operators assist their demonstration by providing an example which shows that the necessary measures have been taken to limit the consequences of a major accident to people and the environment for the event with the highest consequence or severity as identified elsewhere in the report.</p>
<p>14.3.1 The safety report should show that sufficient personnel can be made available within appropriate timescales to carry out the mitigatory actions required by the internal emergency plan.</p> <p>Schedule 3 para 6</p>	<p>The safety report should confirm that the following factors have been taken into account:</p> <ul style="list-style-type: none"> • That the various functions which are required to implement the internal emergency plan have been identified, including the numbers of personnel with appropriate skills or competencies required to implement the plan; • Staff required to implement the plan can be assembled in the required response time; • The mitigatory actions are reasonable and achievable; • The potential for incapacity of key operators has been taken into account. <p>Where applicable, the report should describe:</p> <ul style="list-style-type: none"> • how the number of people and the functions required have been determined (erg Human Factors task mapping analysis (CHIS7) or similar); • how deputising arrangements for key roles have been assigned and how it can be assured that required staff are available; • key functions / roles fulfilled by third parties and how their skills or competence are assured; • Information taken from analysis of the testing of plans which could show detailed assembly times and arrangements and how these relate to overall response times and the analysis of the general suitability of mitigatory actions.
<p>14.3.2 The safety report should show that suitable and sufficient provisions can be mobilised to minimise the release of, and mitigate the consequences of, airborne toxic and/or flammable substances in the event of a major accident.</p> <p>Schedule 3 para 6</p>	<p>The safety report describes what actions employees and third parties are expected to take in order to minimise the release or mitigate the consequences of such events. For example:</p> <ul style="list-style-type: none"> • Actions or measures taken to reduce fumes where hazardous materials have already been spilt; • Measures to reduce the effects of airborne substances (e.g. Water curtains); • How measures are taken to terminate or reduce any leak at source (e.g. patching / plugging or valve closure)
<p>14.3.3 The safety report should show that suitable and sufficient provisions have been made to mobilise first aid/medical</p>	<p>The report should show how the arrangements for internal and external emergency plans fit together. This could be achieved by:</p> <ul style="list-style-type: none"> • Making reference to the number / availability of trained first aiders; • Describing the facilities available at the establishment; • Confirming both the expectations and limits of the first aiders training.

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<p>treatment during the emergency response.</p> <p>Schedule 3 para 6</p>	<ul style="list-style-type: none"> • Describing how the liaison with the local health authority and ambulance services has been carried out, making reference to how the operator's casualty control or decontamination strategies have been determined.
<p>14.3.4 The safety report should show that suitable and sufficient provisions have been made to mobilise any ancillary equipment which may be required during the emergency response</p> <p>Schedule 3 para 6</p>	<p>An outline of the equipment which is intended for use is all that is needed to show this criterion has been considered. This could include equipment such as:</p> <ul style="list-style-type: none"> • fork lift trucks or similar lifting plant; • earth moving equipment; • emergency lighting rigs; • other specialist tools or plant items <p>If there is reliance upon a third party to supply plant or services, the report should describe the equipment needed and explain how this will be sourced, including estimated timescales for its arrival on site.</p>
<p>MAINTENANCE OF EMERGENCY RESPONSE EQUIPMENT</p>	
<p>14.4 The safety report should show that suitable arrangements have been made for the maintenance, inspection, examination and testing of the mobilisable resources and other equipment to be used during the emergency response.</p> <p>Schedule 2 para 2c</p>	<p>Maintenance activities should already be described elsewhere in the report, so a brief summary should meet the requirements of this criterion. Typically, this would include:</p> <ul style="list-style-type: none"> • A description of arrangements used, for example: if using third party organisations, then details of the service level agreement in place should be provided (it is not necessary to include detailed arrangements in place with the emergency services); • Confirmation that suitable arrangements have been made for the maintenance, inspection, examination and testing of emergency response equipment for which the operator has responsibility; <p>for equipment on which the operator may rely upon but not have responsibility for:</p> <ul style="list-style-type: none"> • Confirmation of the operator's arrangements to ensure that the equipment is maintained in an efficient working order such that it would be available for use and provide the necessary function when called upon; • Details of type of equipment covered, e.g. fire fighting equipment, BA sets, personal monitors; • Information on the scheduling of maintenance activities on such equipment
<p>TRAINING IN THE EMERGENCY RESPONSE</p>	
<p>14.5 The safety report should show that suitable arrangements have been made in the safety</p>	<p>The safety report should show that the safety management system has taken account of the need to train individuals in the emergency response, and to ensure that the training is kept up to date, for instance through refresher training or if there is reason to suspect that the training is no longer valid.</p>

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<p>management system for training of individuals on-site in the emergency response.</p> <p>Schedule 2 paras 2a & e</p>	<p>The training should be given to:</p> <ul style="list-style-type: none"> • Employees with a specific role in the event of a major accident • information for other employees who may not have a specific role • Individuals from other organisations with which mutual aid exists • contractors and visitors to the site <p>Where applicable, the training should include:</p> <ul style="list-style-type: none"> • information on the major accident scenarios posing a threat to the environment and the particular steps to take in the event of such accidents • the testing and review of emergency plans to respond to emergencies • specific training requirements for all staff and any relevant 3rd party or contractor organisation; this may involve: <ul style="list-style-type: none"> - knowledge of the alarm systems and the required response to each alarm - procedures for reporting/responding to incidents on site which have the potential to escalate into a major accident - the use of the resources which may be mobilised in the event of a major accident - use of protective equipment and any limitations on their use - evacuation and mustering procedures - actions required by staff with key roles in the implementation on the internal emergency plans <p>Typical information often included in reports to show these elements include a brief outline of training given to contractors, visitors and employees – whether they have a specific role to carry out in the response arrangements or not. A summary of the nature of the training or exercises carried out, for instance table top exercise, scenario specific tests, fire drills, fire and rescue training, along with information on who would be expected to undergo this training. Details on how often training is carried out and an explanation on how gaps in competence are identified may also be provided, along with details of how training is verified.</p>
<p>TESTING AND REVIEW</p>	
<p>14.6 The safety report should show that procedures have been made and adopted to test and review emergency plans, and to revise the emergency arrangements in the light of the lessons learned</p>	<p>The safety report should provide confidence that a suitable programme of emergency exercises has been drawn up. It should show that the programme has been implemented to test the emergency arrangements at all levels (i.e. the local plant response and the site-wide response, and the interface with the external response). Confidence should be given that procedures exist to ensure that the lessons learned from these exercises are reviewed and the emergency arrangements revised where necessary</p> <p>Typical information included in a safety report to show these elements includes:</p> <ul style="list-style-type: none"> • details on the dates of previous exercises or tests including information relating to which scenario or element of the plan was

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<p>Schedule 2 para 2(e)</p>	<p>tested (this should include both on and off site exercises and live or table top exercises)</p> <ul style="list-style-type: none"> • information on how tests or exercises are carried out to ensure all shift patterns are included • details on any debrief / analysis activities relating to how the of the testing of the plan was carried out • information relating to how any actions arising as a result of any analysis or debrief are actioned and incorporated into any review process.
<p>INFORMATION REQUIRED FOR THE EXTERNAL EMERGENCY PLAN</p>	
<p>14.7 The operator uses the safety report to supply information to enable the external emergency plan to be drawn up.</p> <p>Regulation 8 (d)</p>	<p>Schedule 3 minimum information to be included in the safety report will provide the basis for the local authority (as defined) to draw up an external emergency plan. That content is assessed elsewhere within 'Descriptive', 'Predictive' and 'Environment' and 'Emergency Response'.</p> <p>Here we are concerned with the operator describing the arrangements they have made to ensure that the local authority (as defined) receives the <u>necessary information</u> with which to draft the external emergency plan. They do not usually have to provide the entire safety report. To meet this criterion the safety report should:</p> <ul style="list-style-type: none"> • Provide a brief description of the necessary information that the operator has provided to the local authority; and the most recent date that this was done; and • Describe the operator's arrangements to ensure that any information supplied to the local authority is updated as necessary in the light of any changes; and • For establishments designated by the CA as being part of a 'domino group', describe how the operator of the establishment has co-operated with members of the domino group to supply any relevant information to the local authority.

Appendix 14.2 - 'Emergency Response - Changes to Assessment Criteria and Guidance'

The assessment criteria and guidance for Emergency Response aspects of a safety report have been revised for SRAM 2015. The key objectives in making the changes are:

- To ensure the assessment criteria take account of new content requirements for COMAH 2015 safety reports;
- To remove duplication where it previously existed;
- To add clarity in terms of what the assessor should be looking for when they carry out assessment of Emergency Response aspects.

Duplication has been removed by rationalising and merging criteria that were previously separate but strongly related, or in some cases by removing aspects that are already subject to more in-depth assessment by a different assessment discipline – for Emergency Response the other discipline is usually Environment.

The rationalisation has resulted in a change to the numbering of Emergency Response assessment criteria

The following pages provide a map of the change in numbering and describe in broad terms the reasons for changes in specific criteria.

Criteria for Emergency Response

Number	Old SRAM	Number	SRAM 2015
14.1	<p>The safety report should confirm that the operator has consulted the following in the preparation of the on-site emergency plan: those working in the establishment; the Agency; the emergency services; the health authority; the local authority</p> <p>Regulation 9(3) and (4)</p>	14.1	<p>Consultation</p> <p>The safety report should confirm that the operator has consulted the following in the preparation of the internal emergency plan: those persons working in the establishment, the appropriate agencies, (e.g. The Environment Agency, SEPA, NRW) the emergency services, the health authority & the local authority.</p> <p>Regulation 8d and 12(5)</p>
14.2	<p>The safety report should describe the organisation of the alert and intervention in the event of a major accident to provide evidence that the necessary measures have been taken on-site</p> <p>Schedule 4 Part 2, para 5b</p>	14.2	<p>The safety report should describe the organisation of the alert and intervention in the event of a major accident to show that the necessary measures have been taken on-site.</p> <p>Schedule 3 Para 6</p> <p>Criteria same, guidance updated dated to remove duplication and those aspects pertaining to environment assessment.</p>
14.3	<p>The safety report should describe the on-site and off-site resources which can be mobilised by the operator to provide evidence that the necessary measures have been taken to limit the consequences of a major accident to people and the environment.</p> <p>Schedule 4 Part 2, para 5c</p>	14.3	<p>The safety report should describe the on-site and off-site resources which can be mobilised by the operator to show that the necessary measures have been taken to limit the consequences of a major accident to people and the environment</p> <p>Schedule 3 para 6c</p> <p>Old SRAM criteria 14.3.2, 14.3.3 and 14.3.4 now merged into 14.3 for SRAM 2015.</p>
14.3.1	<p>The safety report should provide evidence that sufficient personnel can be made available within appropriate timescales to carry out the mitigatory actions required by the on-site emergency plans</p> <p>Schedule 4 Part 2, para 5</p>	14.3.1	<p>The safety report should show that sufficient personnel can be made available within appropriate timescales to carry out the mitigatory actions required by the internal emergency plan.</p> <p>Schedule 3 para 6c</p>
14.3.2	<p>The safety report should provide evidence that suitable and</p>	14.3	<p>Criterion merged with criterion 14.3 guidance</p>

Criteria for Emergency Response

Number	Old SRAM	Number	SRAM 2015
	<p>sufficient arrangements are in place to ensure that the equipment to be mobilised for mitigating the consequences of reasonably foreseeable major accidents will be fit for purpose when called upon for use</p> <p>Schedule 4 Part 2, para 5c</p>		
14.3.3	<p>The safety report should provide evidence that suitable and sufficient personal protective equipment will be available in the event of a major accident</p> <p>Schedule 4 Part 2, para 5c</p>	14.3	Criterion merged with criterion 14.3 guidance
14.3.4	<p>The safety report should provide evidence that suitable and sufficient site fire fighting and fire protection provisions can be mobilised in the event of a major accident, taking account of resources available from local and other fire brigades</p> <p>Schedule 4 Part 2, para 5c</p>	14.3	Criterion merged with criterion 14.3 guidance
14.3.5	<p>The safety report should provide evidence that suitable and sufficient provisions can be mobilised to minimise the release of, and mitigate the consequences of, airborne toxic and/or flammable substances in the event of a major accident</p> <p>Schedule 4 Part 2, para 5c</p>	14.3.2	<p>The safety report should show that suitable and sufficient provisions can be mobilised to minimise the release of, and mitigate the consequences of, airborne toxic and/or flammable substances in the event of a major accident.</p> <p>Schedule 3 para 5c</p>
14.3.6	<p>The safety report should provide evidence that suitable and sufficient resources can be mobilised to minimise the consequences of loss of containment of a dangerous substance(s) to ground or water (including Controlled Waters)</p> <p>Schedule 4 Part 2, para 5c</p>	Removed	Assessed by Environment. Criterion removed.
14.3.7	<p>The safety report should provide evidence that suitable and sufficient provisions for monitoring and/or sampling can be mobilised in the event of a major accident</p>	Removed	Assessed by Environment. Criterion removed.

Criteria for Emergency Response

Number	Old SRAM	Number	SRAM 2015
	Schedule 4 Part 2, para 5c		
14.3.8	The safety report should provide evidence that suitable and sufficient provisions have been made for the restoration and clean-up of the environment following a major accident Schedule 5 Part 1, para 4	Removed	Assessed by Environment. Criterion removed.
14.3.9	The safety report should provide evidence that suitable and sufficient provisions have been made to mobilise first aid/medical treatment during the emergency response Schedule 4 Part 2, para 5c	14.3.3	The safety report should show that suitable and sufficient provisions have been made to mobilise first aid/medical treatment during the emergency response. Schedule 3 para 5c
14.3.10	The safety report should provide evidence that suitable and sufficient provisions have been made to mobilise any ancillary equipment which may be required during the emergency response Schedule 4 Part 2, para 5c	14.3.4	The safety report should show that suitable and sufficient provisions have been made to mobilise any ancillary equipment which may be required during the emergency response. Schedule 3 para 5c
14.4	The safety report should provide evidence that suitable arrangements have been made for the maintenance, inspection examination and testing of the mobilisable resources and other equipment to be used during the emergency response. (This criterion only applies to mobilisable resources and other equipment which the operator has responsibility) Schedule 2, para 4c	14.4	The safety report should show that suitable arrangements have been made for the maintenance, inspection, examination and testing of the mobilisable resources and other equipment to be used during the emergency response. Schedule 2 para 2c
14.5	The safety report should provide evidence that suitable arrangements have been made in the safety management system for training of individuals on-site in the emergency response Schedule 2, paras 4a & e	14.5	The safety report should show that suitable arrangements have been made in the safety management system for training of individuals on-site in the emergency response. Schedule 2 paras 2a and e
14.6	The safety report should provide evidence that procedures have	14.6	The safety report should show that procedures have been made

Criteria for Emergency Response

Number	Old SRAM	Number	SRAM 2015
	<p>been made and adopted to test and review emergency plans, and to revise the emergency arrangements in the light of the lessons learned</p> <p>Schedule 2, para 4e</p>		<p>and adopted to test and review emergency plans, and to revise the emergency arrangements in the light of the lessons learned.</p> <p>Schedule 2 para 2e</p>
14.7	<p>The safety report should supply information to enable the off-site emergency plan to be drawn up</p> <p>Schedule 4, part 1 para 4</p>	14.7	<p>The operator uses the safety report to supply information to enable the external emergency plan to be drawn up.</p> <p>Regulation 8d</p>
14.8	<p>The safety report should summarise those measures of protection and intervention which have been used as the basis for drawing up the on-site emergency plan.</p> <p>Schedule 4 Part 2, para 5d</p>	Removed	<p>The basis for the criterion under COMAH 1999 is not carried over into COMAH 2015.</p> <p>In terms of the previous guidance, the elements dealing with alert and intervention, and mobilisable resources are covered here by criteria 14.2 and 14.3 respectively.</p> <p>In regard to the equipment installed in the plant to limit the consequences of a major accident this is covered in depth by the Process Safety Assessment and the Environment Assessment. To avoid duplication it is not assessed here.</p>
14.9	<p>The operator should confirm the arrangements that have been made to give information to the public, and every hospital, school or other establishment serving the public, in the area around the site, so designated by the competent authority.</p> <p>Regulation 14</p>	Removed	<p>Part of Regulation 18 public information and is not a requirement of the safety report. Covered as part of Emergency Response inspections.</p>