

Process Safety Forum

Learning Brief #8 – Issued on 18 February 2014

CDOIF: Guidance on ‘Environmental Risk Tolerability for COMAH Establishments’

The Chemical and Downstream Oil Industries Forum (CDOIF)¹ has recently published guidance to help duty holders to complete environmental risk assessments.

COMAH requires all Top Tier site operators to submit site safety reports to the Competent Authority (CA) that demonstrate that the environmental risk for the whole COMAH establishment has been reduced to a tolerable level. Lower Tier operators must prepare risk assessments making a demonstration proportionate and appropriate to the environmental risk, and whilst these are not required to be submitted to the CA these need to be available during CA inspection.

The purpose of this guidance is to provide a common methodology by which this risk assessment can be carried out. The methodology can be used by both duty holders and the Competent Authority when preparing or reviewing risk assessments.

The guidance will also help identify scenarios and areas of installations which are subject to COMAH vs. those that might be subject to other environmental legislation (e.g. EPR, PPC etc.). Where measures (physical or procedural) are necessary for prevention and mitigation of MATTE, then COMAH will be used to regulate those measures; conversely for potential environmental impacts below MATTE thresholds COMAH will not be used but other environmental legislation might apply (e.g. EPR, PPC etc.).

It is not the intention of this guidance to provide a detailed assessment process, but to provide a screening mechanism by which risks to environmental receptors can be reviewed. Depending on the result of this screening, further more detailed analysis may be required.

In summary, this publication provides:

- A clear definition of the types of harm that should be considered in an environmental risk assessment, and how the harm should be characterised for the assessment
- A definition of the risk criteria to be used in assessing the tolerability of the environmental risk from an establishment and, where appropriate, individual scenarios
- Guidance on how the risks may be evaluated
- Guidance on how to include the cost of environmental harm in a COMAH cost benefit analysis

The CDOIF Guideline on ‘Environmental Risk Tolerability for COMAH Establishments’ can be found on the UK Health and Safety Executives website here: <http://www.hse.gov.uk/>

Note 1: CDOIF is a collaborative venture formed to agree strategic areas for joint industry / trade union / regulator action aimed at delivering health, safety and environmental improvements with cross-sector benefits.

The Process Safety Forum has been set up to provide an industry association platform whereby initiatives, best practice, lessons from incidents and process safety strategy can be distilled and shared across sectors, to influence our stakeholders (including the Regulators), and to drive the process safety management agenda. The Process Safety Forum consists of representatives from UKPIA, TSA, CIA, OGUK, CBA, RSSB, ENA, ECIA, UKLPG, BAMA, EIG, UKOPA, SWA and SDF. For further details contact: PSF.Secretary@gmail.com.