

How we work together: **Collaboration in the high hazard sector**

A guide to joint industry, regulator and union groups that work in the high hazard process sectors



COMAH Strategic Forum

The COMAH Strategic Forum is a high-level joint chemical industry and regulator forum working to improve major accident hazard management and raise standards across industry.

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About the COMAH Strategic Forum

The COMAH Strategic Forum (CSF) is a partnership of high level representatives from the UK's health, safety & environmental regulators, Government, industry and UNITE the Union. It was initially established in 2013 to serve as a steering group to support the COMAH Competent Authority (CA) response to the UK Government Better Regulation Executive (BRE) review of enforcement in the chemicals Industry.

The COMAH Competent Authority is represented by each of the five constituent bodies:

- Health and Safety Executive
- Office for Nuclear Regulation
- Environment Agency
- Scottish Environmental Protection Agency
- Natural Resources Wales

The forum now provides a platform for strategic discussion on how regulators, industry, government and unions can work together to provide leadership and encourage continuous improvement in the inspection, management and control (including emergency preparedness and response) of major accident hazards across the onshore industries. The forum defines the strategic issues and then initiates follow up action – more information about how this happens can be found in the terms of reference for the CSF which are available on the CSF Website (refer to page 6 for details).

To achieve these objectives, the CSF works with several other bodies engaged with promoting safety and sharing good practice. This document provides a brief overview of their function, purpose and how they interact.

For more information regarding the way in which the CSF proposes, reviews and determines appropriate action on strategic topics is provided in Appendix 1.



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Why collaborate in the high hazard sector?

Recent incidents including Texas City, Buncefield and Macondo in the Gulf of Mexico have all highlighted the need to work more closely and collaboratively to share knowledge and tackle common problems to reduce the risk of harm.

Working through a relevant trade association to come together with other companies, regulators and unions can help improve performance and provide additional protection to people, the environment, and business.

The regulator also takes the performance of a business managing its risks and the effectiveness of its safety leadership into account when determining where and to what extent it plans its inspections.

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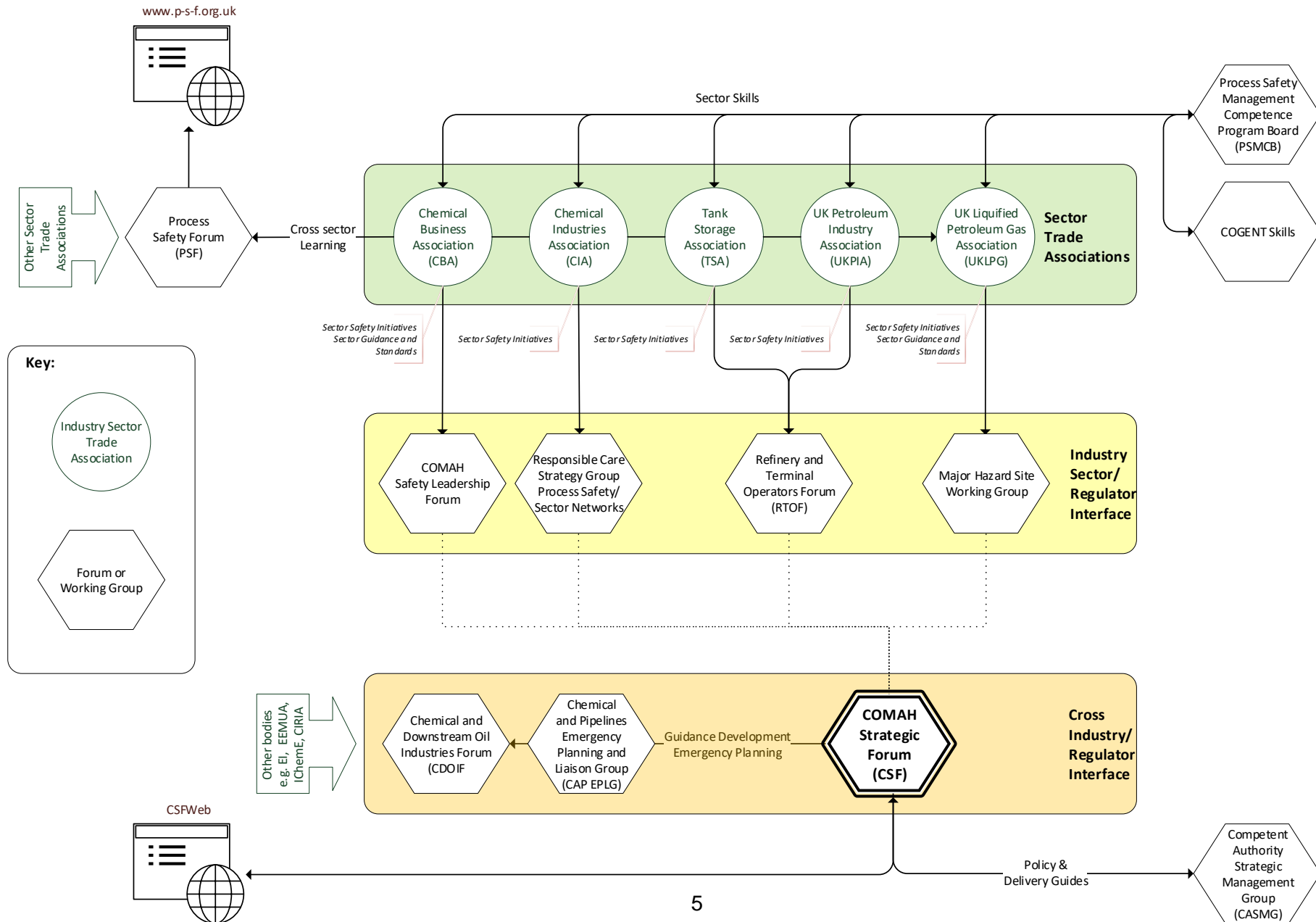
Interaction diagram

The diagram on the following page shows the forums and groups that interact within the high hazard sector and how these relate to the COMAH Strategic Forum.

Note that there are many different fora, working groups and technical committees that work in safety and hazardous sectors and not all are depicted here. For simplicity, only those that have been developed within the chemical and downstream oil sectors. Outputs from these forums and groups are shared more widely through the Process Safety Forum (PSF) and the COMAH Strategic Forum Web Portal (CSFWeb).

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An overview of forums and groups

Sector Trade Associations

Trade associations represent the interests of their member companies within a specific industry sector. Many trade associations also work closely with the regulator in the UK to promote safety initiatives. There are five lead trade associations that work with the COMAH Strategic Forum and other related groups:

- Chemical Business Association (CBA), <http://www.chemical.org.uk/home.aspx>
- Chemical Industries Association (CIA), <https://www.cia.org.uk/>
- Tank Storage Association (TSA), <https://www.tankstorage.org.uk/>
- UK Petroleum Industry Association (UKPIA), <http://www.ukpia.com/>
- UK Liquefied Petroleum Gas Association (UKLPG), <http://www.uklpg.org/>

Several of these trade associations also work closely with the relevant sector skills council, COGENT Skills, and with the Process Safety Management Competence Program Board to promote and encourage competency improvement.

- COGENT Skills, <http://www.cogentskills.com/>
- Process Safety Management Competence Program Board, <http://www.cogentskills.com/psmcpb/>

Industry Sector / Regulator Interface

Each of the industry associations work with their members to share knowledge and best practice, and develop guidance when necessary. Many of these activities are achieved jointly with the regulator through their own established networks and committees. Where the work of these committees is relevant more widely it may be discussed and shared through one of the cross industry/Regulator groups.

Cross Industry / Regulator Interface

COMAH Strategic Forum

The role and purpose of the COMAH Strategic Forum (CSF) is discussed on page 2.

More information can be found on the CSFWeb website here:

<http://webcommunities.hse.gov.uk/connect.ti/COMAHSF/groupHome>

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Chemical and Pipelines Emergency Planning and Liaison Group

Engagement between the emergency planning community, industry and regulator is under review with plans to reform the Chemical and Pipeline Emergency Planning and Liaison Group (CAPEPLG) group in 2018/19 under new terms of reference.

Chemical and Downstream Oil Industries Forum

The role of the Chemicals and Downstream Oil Industries Forum (CDOIF) is to inform regulatory and industry approaches to issues affecting the health and safety of people and the environment.

This is achieved through the development of high level guidance which is written and agreed jointly by industry and regulator. Whilst the guidance produced is not intended to be an authoritative interpretation of what is required in law, it does represent an established and agreed position which promotes consistency in term of implementation and inspection. Examples of CDOIF guidance include:

- Environmental risk tolerability for COMAH establishments
- Preparing for flooding – a guide for regulated sites
- Functional safety management of installed Safety Instrumented Systems

Note that the guidance produced by CDOIF is intended for use in all relevant industries regardless of how they are regulated.

More information can be found on the CDOIF website here:

<http://webcommunities.hse.gov.uk/connect.ti/COMAHSF/view?objectId=54323&exp=e1>

Process Safety Forum

It is recognised that much of the work carried out at sector level and more widely within CDOIF, CAPEPLG and CSF may be of relevance to other businesses which have the potential to cause harm to people or the environment.

The role of the Process Safety Forum (PSF) is to provide a platform whereby initiatives, best practice, lessons from incidents and process safety strategy can be distilled and shared across sectors. This is achieved through the publication of Newsletters, Process Safety Alerts and Learning Briefs, as well as providing a place where safety can be discussed openly between industry associations.

Membership of the PSF includes representation from the Water, Chemicals, Downstream Oil, Upstream Oil and Gas Bulk Liquid Storage, Nuclear, Scotch Whiskey, Mining and Minerals, Explosives, Aerosol, Rail and Pipelines industries.

More information can be found on the PSF website here: <http://www.p-s-f.org.uk/>

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Further reading

The CSF has published two papers which provide invaluable information on the importance of safety leadership within a business and why working together can reduce the risks of a major accident:

- Managing Risk: The hazards that can destroy your business,

<http://webcommunities.hse.gov.uk/connect.ti/COMAHSF/view?objectId=656517>

- Principles of good safety leadership,

To be produced (this is a simplified version of the PSLG principles)

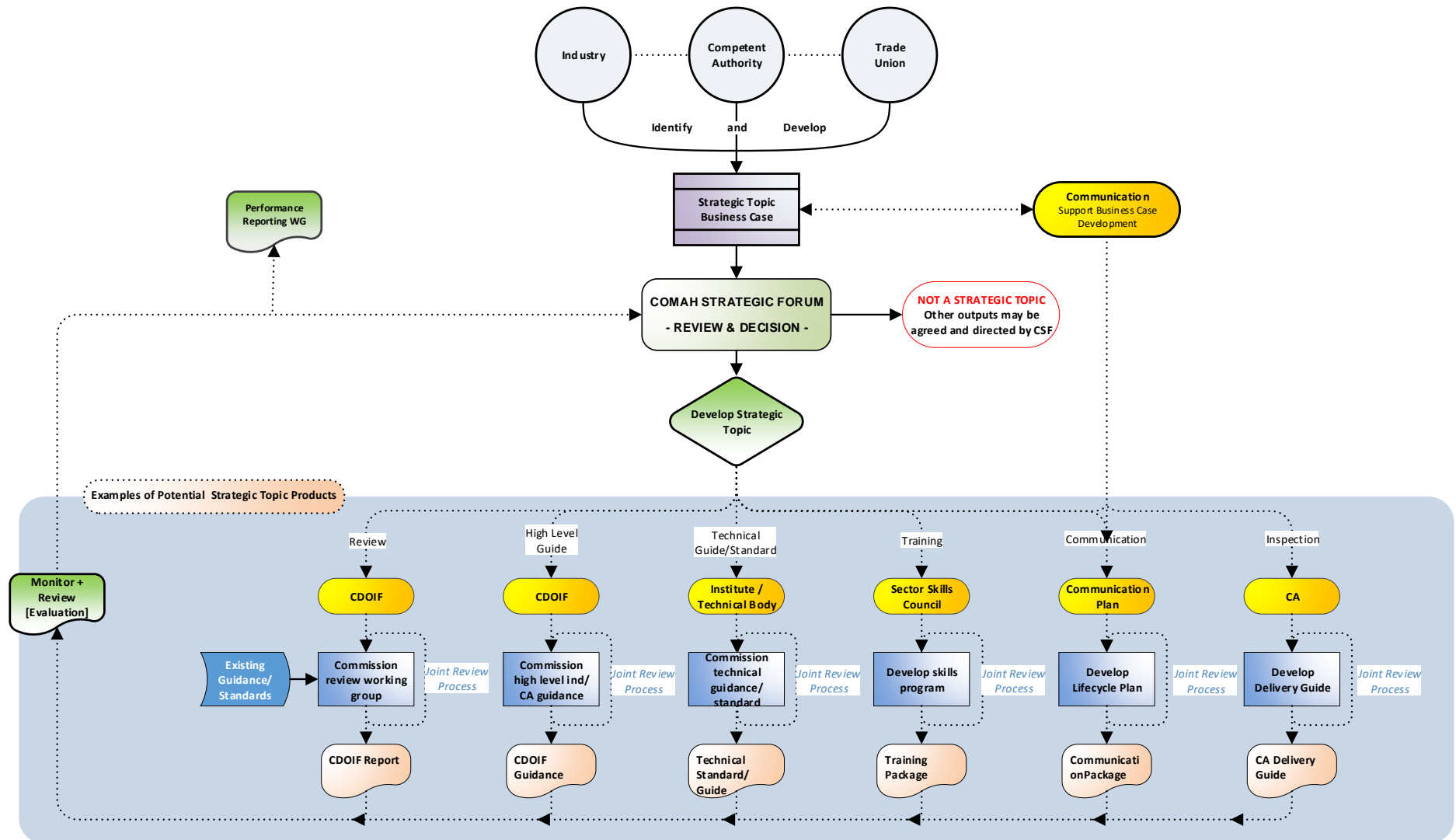
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Appendix 1 Assessment of Strategic Topics

The following diagram provides an overview of the process followed by the COMAH Strategic Forum when assessing strategic topics.

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Notes:

- **Business Case** – brought by any one of the three originator groups shown; based on clear evidence
- **Development Phase** – The blue box shows examples of products but it is not one size fits all. Sequencing and composition of such products will be dependent upon the Strategic Topic.
- **Joint Review Process** – formal stakeholder review, comments and responses provided to originator. Final sign off following agreement of all stakeholders – [CSF oversight]

- **CDOIF and technical guides and standards** - these may be referenced in future planned interventions. Where a demonstration of compliance (SFAIRP) is required (or equivalence) timescales to be agreed through the COMAH Strategic Forum.
- **Inspections** – CA / Industry to review reference points for scheduled interventions ensuring, where necessary, that linked supporting products are delivered in a planned way as part of the overall Strategic Topic package.

Example Strategic Topic Products:

- **CDOIF Review** – planned review of existing guidance and standards for protecting against flooding
- **CDOIF High Level Guide** – The use of external contractors in the management of ageing plant
- **Skills** – e.g. Process Safety Leadership
- **Delivery Guide** – e.g. Human Factors, Ageing Plant, etc
- **Technical Guide/Standard** – e.g. CIRIA C736, EEMUA 191, EI 19