



COMAH: Is Your Safety Review Due?

Whenever changes are made to the way hazardous substances are stored or handled on sites, whether the changes are to the process, the plant and equipment, the methods of work or the teams carrying out the work, there is always the potential for increased risk.

It is a legal requirement that the risks to people and the environment remain as low as reasonably practicable (ALARP). It is also a legal requirement that Safety Reports at top tier COMAH sites are reviewed when changes are made on site, or at least every five years. Your existing Safety Report may therefore need to undergo review and revision even though the five year deadline may not have been reached, if:

- It is known that the changes will have significant repercussions with respect to the prevention of major accidents or the limitation of major accidents to people and the environment
- It is considered that the changes made could have significant repercussions

Well developed management of change procedures are an essential part of the process safety management system and will help streamline the review process. If implemented correctly, they will allow relevant changes to be identified as they are proposed and should stimulate a wider review of the attendant risks, if appropriate.

The cumulative effect of a number of smaller changes over time is more difficult to assess but these could also have significant repercussions, even though each change in isolation may not pose a significant risk.

Our Unique COMAH Review Tool

Our considerable experience gained from working with operators of top tier and lower tier COMAH sites over the last decade has led to the development of our own in-house process safety management auditing and assessment tool, **INSIGHT Lifecycle®**. The COMAH Review module allows us to:

- Quickly review the changes that have occurred (or are being proposed)
- Evaluate whether or not they could have significant repercussions
- Determine the extent of the review/revision required

Our assessments are carried out on site as a collaborative exercise with the key stakeholders; supporting evidence is also examined to provide a clear picture of what has actually happened since the last review.

COMAH: IS YOUR SAFETY REPORT DUE FOR REVIEW?

Whilst the time between reviews can be up to five years, experience suggests that operators will often benefit from undertaking interim reviews at more regular intervals. For example, where smaller changes are frequently taking place, an annual review will give a much clearer picture of the site's current risk profile and will significantly reduce the workload when it comes to the mandatory review.

Our assessment process is thorough, yet relatively swift, and allows us to gauge the scope of any revisions required. We can then make recommendations on when and how best to update the Safety Report. We can also help you to present your proposals to the COMAH Competent Authority to reach agreement on the best way forward, and provide assistance for any updates if required.

Why HFL Risk Services?

Experience

Our experienced team of consultants and engineers has been successfully preparing, maintaining, reviewing and revising COMAH Safety Reports since they were first introduced in 1999.

Expert Knowledge

We have an unrivalled knowledge and understanding of the requirements of the Competent Authority and their relevance to our clients' situations and needs.

Credentials

Having provided support to more than 20% of the UK's top tier COMAH sites, we have not surprisingly developed long-standing relationships with many blue chip companies. With the powerful backing of the Haden Freeman Group, we are uniquely positioned to help those in the process and related industries to meet the challenges presented by modern risk-based legislation.

How can I tell if changes I make could have 'significant repercussions'?

According to the Competent Authority, this will depend upon the degree to which the changes:

- Introduce a new accident hazard
- Change the risk from an existing hazard
- Affect control or mitigation measures (including off-site emergency plans)

Changes that have a positive impact on the risk profile are also important and should be documented. An example could be the substitution of a non-toxic substance where a toxic substance was previously used.

Examples of changes

Safety Management System (SMS) Changes

- Organisational change
- Use of contractors
- Demanning
- Changes in procedures
- Combining roles, etc.

New Facts or Knowledge

- Changes in risk phrases assigned to dangerous substances
- Changes in land use around sites
- Reclassification of substances
- Learning points from worldwide incidents, etc.

Plant Modifications

- Substance changes (type, classification, inventory)
- Removal/introduction of safety-critical plant
- Changes to storage facilities or occupied buildings
- Control system changes
- New supplier, etc

N.B. For plant modifications, reviews must be undertaken in advance of any changes being made.



HFL Risk Services Limited
Freeman House, Orbital 24, Oldham Street,
Denton, Manchester, M34 3SU
Tel: 0161 304 5902 Fax: 0161 304 5903
E Mail: sales@hflrisk.com Web: www.hflrisk.com

For more information
or for an informal
discussion, please
contact us on:

0161 304 5902
or email
sales@hflrisk.com