

Major Accident Prevention Policy – Submission to the CCA

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Major Accident Prevention Policy

- Regulation 10

Requirement that every Operator (upper-tier and lower-tier) must prepare a major accident prevention policy (MAPP) document for submission to the CCA.



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Major Accident Prevention Policy (MAPP)

- Main Goal – Achieving Plant Safety thus ensuring high Level of Protection for Man and Environment
- Both on- and off-site
- MAPP – Main Tool
- Applies for all Establishments
- Formal Document
- Proportionate to the Major Accident Hazard
- Overall Aims and Principles of Major Accident Hazards Prevention and Control



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Safety Management System (SMS)

- Part of the overall Management System
- Includes the organizational structure, responsibilities, practices, procedures, processes and resources for determining and implementing the MAPP
- No explicit requirement to constitute a formal document
- Could be integrated with the Environmental & Health Management System
- Available to the CA for the purposes of:
- Verification that the operator has taken all measures for prevention of major accidents and limitation of their consequences for man and the environment
- Control over the safety performance of the enterprise



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MAPP and SMS - Principles

- Achievable and proportionate to the hazards
- Continuous improvement
- Compliance with existing Safety, Health & Environmental legislation as a minimum requirement
- Compliance with any other voluntary commitments undertaken by the Establishment
- Endorsed by senior management
- Documented and implemented



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MAPP and SMS - Principles

- Consultation with the Personnel on-site (incl. Subcontractors)
- Personnel provided with Information for and Training on the MAPP and the SMS
- Available for all relevant Stakeholders
- Monitored and Evaluated periodically and after certain events (i.e.. Accidents, near misses, changes in the legislation or technology, etc.)
- Reviewed and updated periodically and after certain events in order to ensure their adequacy and efficiency



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What elements should the SMS address?



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SMS – Elements

□ ORGANISATION AND PERSONNEL

- Roles and responsibilities of the personnel
- Identification of training needs
- Involvement of employees and others



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SMS – Elements

□ IDENTIFICATION AND EVALUATION OF MAJOR HAZARDS

- Systematic identification of MAH
- Development of representative major scenarios
- Assessment of the likelihood and severity
- Evaluation of the acceptability of risks
- Normal and abnormal operation



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SMS – Elements

□ OPERATIONAL CONTROL

- Procedures and instructions for safe operation of the plant
- Taking account the relevant hazardous substances properties, processes, incl. temporary stoppages etc.



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SMS – Elements

□ MANAGEMENT OF CHANGE

Procedures for the planning of:

- the modification of existing or the design of new installations
- The introduction of new processes or substances



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SMS – Elements

□ PLANNING FOR EMERGENCIES

Procedures for:

- foreseeable emergency situations by systematic analysis
- preparation, testing and review of emergency plans
- specific training for the personnel
- cooperation with the LCA



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SMS – Elements

MONITORING PERFORMANCE

Continuous assessment of:

- compliance with the objectives in the MAPP
- the adequacy of the measures foreseen in the SMS
- corrective action in case of non-compliance determining the immediate causes of sub-standard performance
- reporting, investigation, and follow-up on the basis of lessons learnt, of major accidents or near misses



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SMS – Elements

AUDIT AND REVIEW

Procedures for periodic systematic assessment of:

- the adequacy of the MAPP
- the effectiveness and suitability of the SMS
- Internal plant and site audits
- Independent audits of site



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SMS – Elements

AUDIT AND REVIEW

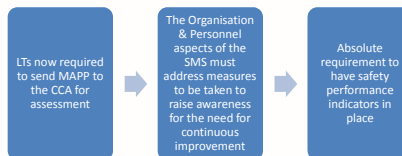
Procedures for periodic systematic assessment of:

- Evaluating audit results against safety and environmental policy standards
- Evaluating audit results against performance of competitors and best practice
- Documented review of the performance of the MAPP and SMS
- Update and follow-up by senior management to achieve improvements identified



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What's new?



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MAPP Preparation & Submission timelines

- **New:** No later than 1 month prior to when the COMAH Regulations apply (Reg. 10(6)(a))
- **Other:** 1 year from when the COMAH Regulations apply (Reg. 10(6)(b))
- **Existing:** Before 1st June 2016 (Reg. 10(4))

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Submitting the form

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Review & Update

An Operator will need to review the MAPP if you make any modifications which could have significant repercussions in respect of the prevention of major accidents, including changes to

- Your establishment
- The type or amount of dangerous substances used
- How you process and/or store them

Review & Update continued

- It also should be reviewed and updated no later than five years after the date on which the policy was last reviewed.
- It should be reviewed after audit
- And after every accident or near miss

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MAPP Verification Process

- Verification of the MAPP will form part of the inspection process
- Formal assessment system for MAPPs to be put in place in the future

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