Good Practice in Emergency Planning for COMAH Sites:

A Survey by the Emergency Planning College

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1. The Purpose of the Report

The purpose of this report is to share the initial findings of the EPC COMAH Good Practice Survey, undertaken over a number of months in 2013.

2. Background

The College currently runs the only national training course for emergency planners involved in preparing COMAH plans. Delegates on these courses often ask to see examples of good practice in COMAH plans, but the joint competent authority for COMAH, the Health and Safety Executive and the Environment Agency, are not in a position to describe what this looks like or to assess plans - beyond telling COMAH operators and local authorities that their plans are either "adequate" or "not adequate".

The Emergency Planning College has formed relationships with COMAH sites and local authorities with duties under the COMAH regulations, and it is believed that the industry is seeking to establish some co-ordination around good practice issues.

The College decided to undertake two surveys to gather information and test the appetite of the industry for finding out and sharing good practice within COMAH planning. This fits in with the College's mission to improve resilience in all sectors of United Kingdom.

Two surveys were distributed, one aimed at COMAH sites, and one aimed at local authorities. A total of 49 COMAH sites and 28 local authorities responded to the surveys. The surveys took place between July and October 2013.

This report describes the findings of the surveys along with some commentary.

3. Purpose of the Surveys

The publicly stated aim of both surveys was to identify and disseminate good practice in emergency planning for the COMAH community as a whole.

Responders were promised that the surveys were only for the Emergency Planning College's research, and individual responses would not be made available to other government departments or commercial organisations.

4. Findings of the Survey

4.1. Local COMAH Forums

COMAH site operators were asked if they belonged to a local group or forum of COMAH site operators that regularly meets to discuss COMAH-related issues.

Out of 51 responses, 26 sites (51%) said that they did belong to such a Forum.

Of these 26 sites, 21 said that they found the Forum always useful, whilst the other 5 said that they were occasionally useful.

The same question was asked of local authorities responsible for creating off-site emergency COMAH plans

Out of 28 responses, 18 said that they belonged to such a forum. Of these 18, 15 said that they always found the Forum useful whilst 3 said that the Forum was occasionally useful.

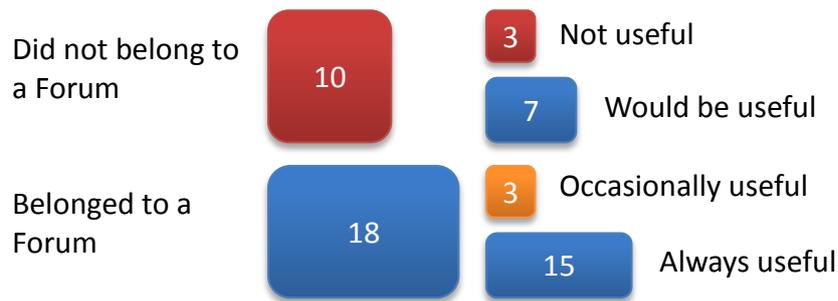Nobody in either target group said that they found the Forums not useful.

In addition, of those 25 COMAH sites which did not belong to a forum, 15 said that belonging to such a Forum would definitely be useful, whilst 6 said that such membership may be useful.

Only 3 sites believed that a Forum would be not useful. Of the 10 local authorities who did not belong to a Forum, 7 thought that membership would be useful, with only 3 failing to see the usefulness of this type of group.   Further analysis however shows that these 3 local authorities are in areas where there only one or two COMAH sites.

Local COMAH Forums: COMAH site operator responses

Local COMAH Forums: Local authorities responses

Did not belong to a Forum
10

3 Not useful

7 Would be useful

Belonged to a Forum
18

3 Occasionally useful
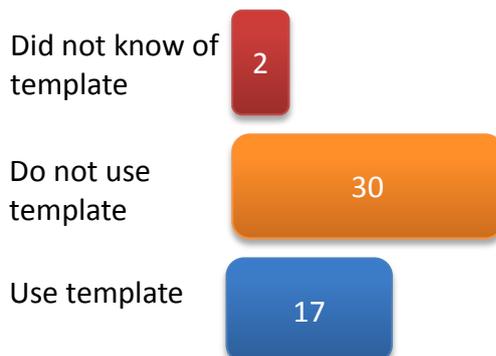
15 Always useful

These findings indicate that where COMAH Forums already exist, the members find them a useful vehicle for discussion, and where they don't exist, there is a general enthusiasm for such groups.

4.2. On-Site Planning Template

COMAH site operators were asked whether or not they used the Health and Safety Executive's on-site emergency plan template when compiling the on-site emergency plan.

Of the 49 sites who responded, only 17 used the template whilst 30 sites said that they didn't use it. 2 sites said that they didn't know of it.

On-Site Planning Template: COMAH site operator responses

Did not know of template
2

Do not use template
30

Use template
17

Further investigation however shows that many of the 30 sites who didn't use the template had on-site plans in place before HSE published the planning template. It is therefore difficult to read too much into this particular finding.

4.3. On-Site Emergency Planning Consultation

COMAH sites were asked which organisations they consulted with in the preparation of their on-site emergency plan. 42 of the sites responded and their answers are presented in the table below:
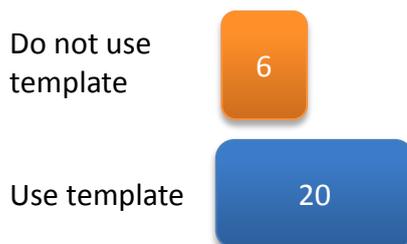
Organisation	Number of sites who consulted with this organisation
HSE	37
Environment Agency/SEPA	35
Fire Service	39
Police	29
Local Authority	31
Health Authority	18

The Health and Safety Executive's on-site planning template suggests that all of these organisations should be consulted in the preparation of the on-site plan. Whilst the majority of organisations appear to be consulted in the majority of cases, it is worrying that less than half of the sites have consulted with the local Health Authority.

4.4. Off-Site Planning Template

There is no national emergency planning template for off-site COMAH plans. Local authorities, who have a statutory duty to prepare such plans, were asked if they used their own local template to prepare their plans. Of the 26 local authorities who responded, 20 do use a template, whilst 6 do not.

Off-Site Planning Template: Local authority responses

Do not use template   6

Use template   20

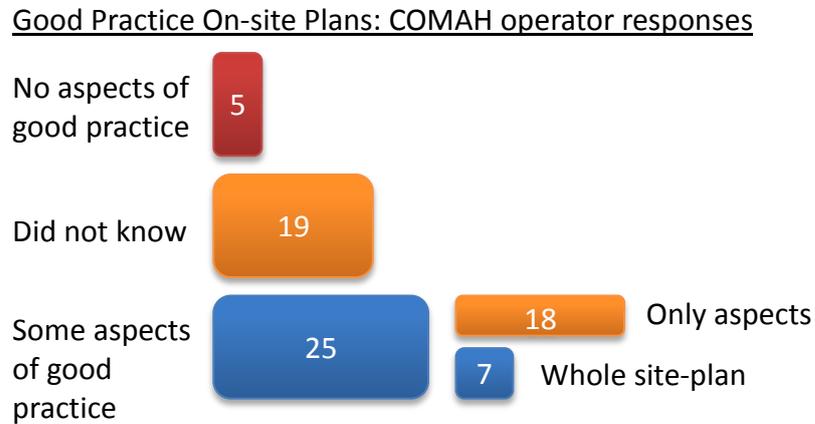### 4.5. Good Practice in Preparing On-Site Emergency COMAH plans

COMAH sites were asked if they considered any part of their on-site plans to be examples of good practice. Of the 49 sites which responded, 25 believed that aspects of their plans were examples of good practice, 5 sites did not believe any aspects of their on-site plans were examples of good practice, and 19 sites stated that they did not know whether or not their on-site plan was an example of good practice.

It is interesting to note that just less than half of all sites who responded either didn't believe that any aspect of the plan was an example of good practice or that they didn't feel able to make a judgement on the matter. This perhaps shows a lack of understanding and awareness of what makes a good on-site plan.

The 25 operators who believed that aspects of their on-site plan were examples of good practice, were also asked to indicate which aspects of their plan they believed to be good practice. The results are shown in the table below:

Aspect of on-site plan	Number of sites (out of 25 responders) who believed this aspect of their plan was good practice
All of it	7
Description of the role of the Site Controller	16
Description of the role of the Site Incident Controller	15
Site Emergency Control Centre arrangements	15
Links to the off-site plan	15
Command and control arrangements	13
Arrangements for training staff	13
Arrangements to limit the risk to person's on-site	8
Description of potential range of hazard scenarios	7
Plan activation procedures	6
Interface with the emergency services	6
Contact information	6
Environmental arrangements	5

It is interesting to note that only 7 out of 25 sites considered their whole on-site plan to be an example of good practice. These sites could become potential case studies for good practice in creating on-site COMAH plans.

Good Practice On-site Plans: COMAH operator responses

No aspects of good practice: 5

Did not know: 19

Some aspects of good practice: 25
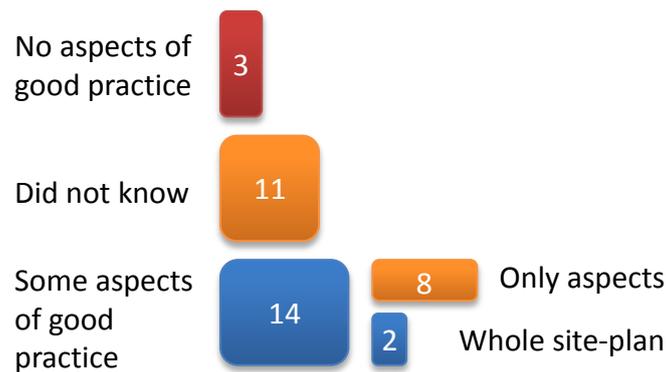
Only aspects: 18

Whole site-plan: 7

It is also interesting to note the following observations:

- Only 13 out of 51 sites believed their training arrangements in respect of the on-site plan were examples of good practice.
- Despite 35 sites consulting with the Environment Agency/SEPA on the creation of the on-site plan, only 5 sites thought that their environmental arrangements were examples of good practice.
- Despite 39 sites consulting with the FRS on the on-site plan, and 29 sites consulting with the Police, only 6 sites believed that their interface with the emergency services was an example of good practice.
- Despite 37 sites consulting with the Health and Safety Executive on creation of their on-site plan, only 7 sites believe that their description of the range of potential hazard scenarios are examples of good practice.

4.6. Good Practice In Preparing Off-Site Emergency COMAH Plans

Local authorities were asked if they considered any part of their off-site plans to be examples of good practice. Of the 28 authorities which responded, 14 believed that aspects of their plans were examples of good practice, 3 authorities did not believe any aspects of their off-site plans were examples of good practice, and 11 authorities stated that they did not know whether or not their off-site plans were example of good practice.

No aspects of good practice 3

Did not know 11

Some aspects of good practice 14

Only aspects 8

Whole site-plan 2

It is interesting to note that, similar to the outcome of the sites' opinions of their own on-site plans, half of all local authorities who responded either didn't believe that any aspect of their plans were examples of good practice or that they didn't feel able to make a judgement on the matter. It is probably not the case that this is down to a lack of understanding and awareness of what makes a good off-site plan, as these plans are prepared by professional emergency planners. The reasons for this are open to supposition.

The 14 local authorities who believed that aspects of their off-site plan were examples of good practice, were also asked to indicate which aspects of their plan they believed to be good practice. Only 10 of the 14 completed this question. The results are shown in the table below:

Aspect of off-site plan	Number of local authorities (from the 10 responders) who believed this aspect of their plan was good practice
All of it	2
Plan activation procedures	6
Interface with the emergency services	5
Command and control arrangements	5
Use of GIS mapping	5
Public warning arrangements	4
Descriptions of the roles of individuals	4
On-going public information arrangements	3
Arrangements to limit the risk to persons off-site	3

Off-site Emergency Control Centre arrangements	3
Description of the roles of organisations	3
Environmental arrangements	3
Extended area of risk information	3
Description of potential range of hazard scenarios	3
Links to the on-site plan	2
Arrangements for training staff	2
Contact information	6

As can be seen from these results, there does not seem to be a great deal of confidence in the COMAH community that their off-site emergency plans are examples of good practice.
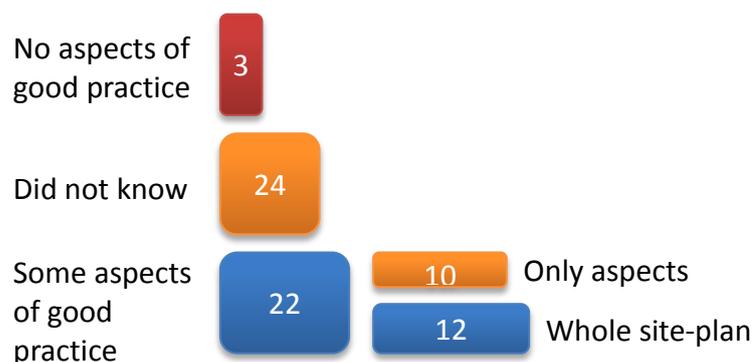
Again, it is interesting to note that only 2 out of 28 local authorities considered all of the content of their off-site plans to be examples of good practice. These authorities could become potential case studies for good practice in creating off-site COMAH plans.

It is also interesting to note that only 2 out of 28 local authorities believed their training arrangements in respect of the off-site plan were examples of good practice.

COMAH sites were also asked for their opinion of their own off-site plans, which are prepared by the local authority.

Of the 49 sites who responded, 22 thought that some aspects of their off-site plan were examples of good practice, whilst 24 did not know, and 3 thought that no aspects of their off-site plans were examples of good practice.

Good Practice Off-site Plans: COMAH operator

No aspects of good practice 3

Did not know 24

Some aspects of good practice 22

Only aspects 10

Whole site-plan 12

The 22 sites who believed that aspects of their off-site plan were examples of good practice, were also asked to indicate which aspects of their plan they believed to be good practice. The results are shown in the table below:

Aspect of off-site plan	Number of COMAH sites (from the 22 responders) who believed this aspect of their plan was good practice
All of it	12
Plan activation procedures	5
Interface with the emergency services	8
Command and control arrangements	4
Use of GIS mapping	5
Public warning arrangements	3
Descriptions of the roles of individuals	2
On going public information arrangements	4
Arrangements to limit the risk to persons off-site	4
Off-site Emergency Control Centre arrangements	8
Description of the roles of organisations	4
Environmental arrangements	4
Extended area of risk information	3
Description of potential range of hazard scenarios	4
Links to the on-site plan	4
Arrangements for training staff	1

It is interesting to note that only 12 out of 49 sites believed that the whole plan which had been written by the local authority for the area around their site was an example of good practice, but this could be because there is uncertainty in the industry about what good practice looks like. Again, the numbers of sites who believed that their own environmental arrangements and training arrangements are examples of good practice is very low.

4.7. Sharing Good Practice

26 COMAH sites were asked if they would be happy to discuss sharing aspects of good practice with other COMAH sites. There was a positive response form 24 of the sites, with 1 site saying they would not be interested and another site being undecided.

Similarly 27 out of 28 local authorities said that they would be interested in seeing examples of good practice from other off-site COMAH plans. 26 out of 28 said they would be interested in sharing good practice.

There appears to be a widespread appetite for good practice to be identified and shared between sites and local authorities.

4.8. Independent Assessment of Plans

Sites were asked if they would be interested in an independent and confidential assessment of their current on-site and off-site emergency plans. Local authorities were asked the same question in respect of the off-site plans they had prepared.

The results are shown in the table below:

Organisation and plan type	YES	NO	NOT SURE
Sites interested in independent review of ON-SITE plan (out of 51)	19	19	13
Sites interested in independent review of OFF-SITE plan (out of 51)	15	25	11
Local authorities interested in independent review of OFF-SITE plan (out of 28)	14	7	7

4.9. SEVESO III

Both sites and local authorities were asked about the impact of Seveso III on their emergency planning arrangements. They were given a range of choices about

potential impacts, and asked which ones they thought applied to them. The results are shown in the table below.

Potential Impact	Number of sites thinking this is applicable (out of 49)	Number of local authorities thinking this is applicable (out of 26)
Additional information required for on-site plan	15	-
Additional information required for off-site plan	13	16
Additional public warning arrangements required	10	12
Additional public information arrangements required	26	17
Don't know what the potential impacts are at all	18	7

The most worrying aspect of this part of the results is the large number of sites and local authorities which did not know what the potential impacts of Seveso III are.

4.10. New Initiatives

Sites and local authorities were asked to say what initiatives would be useful in helping them to create and maintain their emergency plans. They were given a range of choices.

The results are shown in the table below:

Initiative	Sites (out of 49) who said this would be useful	Local authorities (out of 26) who said this would be useful	Total
A national template for an off-site emergency plan	26	16	42
A national public information campaign reinforcing the 'Go In – Stay In – Tune In' message.	27	17	44
A series of good practice case studies	40	24	44
A national repository of information	21	12	33

4.11. Conclusion

The surveys have provided an important insight into the state of COMAH planning in the United Kingdom in the present day. They show that there is an appetite in the industry for sharing good practice and for the existence of local and regional COMAH Forums.

There is also uncertainty about the quality of existing on-site and off-site COMAH plans, or are at any rate, a lack of confidence in the existence of good practice around many aspects of COMAH plans.

This uncertainty also surrounds the training arrangements, environmental aspects, interface with the emergency services and the description of potential hazard scenarios in respect of on-site plans. This uncertainty is not as pronounced for off-site plans but, nonetheless, exists.

There is also doubt as to what the full impact of Seveso III will be on both site operators and on local authorities.