

Writing your Major Accident Prevention Policy – advice to operators of COMAH lower-tier establishments

Under the *COMAH Regulations 2015* you must prepare and submit a document to the Central Competent Authority that sets out your major accident prevention policy. As the name implies, the policy document should be confined to addressing the prevention of major accidents (to human health and the environment) and not routine safety matters.

The CCA will make an assessment of all submitted MAPPs to check for compliance with the Regulations.

The policy should have the stated aim of guaranteeing a high level of protection to human health and the environment. It should set out, broadly, how you intend to achieve this.

The policy (and its implementation) must be proportionate to the major accident hazards at your establishment and the complexity of the activities and of your organisation. Therefore the level of detail in the policy document will vary as necessary to meet the Regulations' requirements.

You will have to make a judgement on the appropriate level of detail to provide, but it should be obvious that a site storing a single dangerous substance covered by a code of practice and employing less than five people would have to provide a less detailed policy document than a medium-sized manufacturing site with complex processes and a more complex management structure.

Policies guide the way people within your establishment will make decisions, so your policy should be sufficiently detailed to give the assessor confidence, from reading your policy, that it is a good fit for the management system and major hazard complexity of your establishment.

In your policy you should emphasise management's role in its creation and implementation. You should give a commitment to continuous improvement in the means of prevention and control of major accident hazards.

You should set out how your policy will be implemented, noting company structures and the existing management system and particularly the individual and collective management responsibility for implementation.

You should acknowledge that the implementation of the policy requires appropriate organisational structures, resources and people (be more specific about this). If your establishment has significant major accident hazards this could mean that you will have a policy to employ people with recognised high technical competence or perhaps you will use

external resources or a combination of both. Your policy should address human factors, the reliability of people-centred prevention measures, how you will identify training requirements and the general nature of the training that will be given.

You should make reference to the methods you will employ, not only to systematically identify the major accident hazards at your establishment, but also to characterise their consequences and risk.

Your policy on control of operations should cover the use of written procedures, the proper maintenance of plant and the adoption or use of good practice.

Your policy should address how you manage significant changes and the procedures you have in place around new plant and processes as well as to modifications of existing plants and processes, where these have the potential to affect major accident prevention or control measures (There Is No Need To Include Actual Procedures).

You should acknowledge the necessity to plan for emergencies and set out your policy in that regard, including how you identify and prepare for emergency situations, how you identify appropriate responses and how and when you test those responses.

You must clearly commit to the use of safety performance indicators and outline any other measures that will ensure compliance with the policy. The role of senior management in reviewing and acting on safety performance indicators should be asserted. You should set out your policy on the investigation of near-misses.

Finally, you should state how you will audit the implementation of the policy and the suitability and fitness of the management system to deliver it and particularly the involvement of senior management.

The policy should be signed by the most senior manager at the establishment.

The full legal requirements are set out in Regulation 10 and Schedule 2 ([link](#))

What happens next?

The CCA will provide you with a link by May 4th 2016 to where you should send your policy document (in Word or equivalent or PDF format).

For existing establishments, the MAPP is required to be sent to the CCA by **1st June 2016**.

If you do not receive a link contact your local inspector or the COMAH mailbox at comah@hsa.ie .

The CCA will assess each policy document received under Regulation 10. A form has been developed for the assessment. The form covers all MAPP types and the assessing inspector will make a judgement on proportionality when carrying out the initial assessment of the MAPP.

If the assessor is of the view that your policy is clearly not proportionate to the major hazards and complexity of your establishment you will be required to revise and resubmit the MAPP.

During routine COMAH inspections, inspectors will verify that the policy that has been set out in your MAPP is being implemented. The assessment form referred to above will also be used in that phase of the assessment.