

Comments on the Impact Assessment for Making Gasoline a Dangerous Fluid under the Pipeline Safety Regulations (PSR) 1996

Para	Comment
8	It is worth noting that the two research projects concluded that the risk associated with gasoline was marginal for the justification of gasoline to attract the additional duties under PSR, however, evidence from actual incidents recommended its inclusion based on potential consequence.
13	UKOPA would not support the statement that individuals and firms only consider private costs and benefits relating to gasoline pipelines.
13	The paragraph notes that “Including gasoline pipelines in the additional duties is a means by which regulators can ensure the externalities generated by the risks associated with gasoline pipelines are appropriately controlled” as stated in 8 above, UKOPA understand that the key driver to the inclusion of gasoline as a dangerous fluid was the consequences of a gasoline pipeline failure rather than the risk.
20	Minor point – this assumes that the work is conducted in house, however, more and more of these activities are supported by consultants who’s rates are significantly higher than quoted here.
21	If no new pipelines are planned or envisaged will land use planning actually improve the overall benefit to individuals and society or just prevent the risk/consequences getting worse over time?
22	Is a Europe-wide failure rate realistic for the UK conditions as the Europe-wide failures include a number of events which are not “realistic” for the UK. UKOPA would promote the use of UK statistics.
36 – 49	Para 36 concludes that there the expected fatality level in the 40 year period will be 4.05 urban and 0.11 rural. This added to the injuries equates to £5.2 million over the 40 year period (para 43). Again add £3.0 million (para 48) for non catastrophic events gives a total of £8.2 million cost over the appraisal period (para 49). However the summary quotes fatalities and injuries £204.2 million and clean up £3million (page 2). Is this comparing like with like? – it appears the total cost of £5.2 million has been converted into an annual saving in the summary. Para 48 indicates 1.3 gasoline release events per year per 1000 km gives 4.7 events every year for 3,600 km, this is clearly incorrect, the data is overpredicting failure rate by at least a factor of 10.
50	The Impact Assessment estimated 3,600 km of multiproduct pipelines in UK and would suggest that this network of pipelines accounts for the vast majority of pipelines (by length) that might be used to transport 'gasoline'; perhaps as much as 90%. However, in addition to that (primary) network there are an unknown number of pipelines of comparatively short length - in many/most cases less than 2km - within for example port areas, refineries and processing plants etc. dedicated to transporting gasoline. UKOPA do not have a database of these pipelines.

60	The cost of preparing an MAPD appears low but may not be material in the overall costs. However, based on the comment on para 50 above, UKOPA envisages more that 10 operators.
65-68	Comments are covered separately by UKOPA.
73	UKOPA is concerned that the data is not up to date, as all data relates to before 2002.
78	There are records of compensation being paid or the pipeline relocated under the pipeline deed of grant for cross country pipelines in the UK.
77-84	<p>UKOPA recognizes that the process used to calculate the cost impact of regulations effectively assumes that there will be an acceptable usage for land and thus the cost impact for a planning refusal under land use planning is small on the basis that an alternative use will be acceptable. However, the cost impact on the pipeline owner and ultimately the consumer (as these costs will ultimately find their way through the price of petrol) will include any compensation paid to the land owner for his loss i.e. if a developer wishes to build some high density housing and can claim compensation under the Deed of Grant (loss of profit) for a planning refusal or reduction in number of houses due to the presence of the pipeline then these costs are real and significant to the owner. Alternatively, as stated under para 84 if may be possible for the owner to mitigate these costs with additional protection measures – again this is a cost bourn by the operator.</p> <p>UKOPA are happy to work with the HSE to better define these costs and their impact within the regulations.</p>
Summary	Refers to Flammable Liquids which is different definition for “Gasoline “to that given separately by HSE.
Annex 1 Paras 10-11	These paragraphs report that HSE’s LUP zones are based on an inner zone related to spillage pool radius (50m) and an outer zone related to risk (60m). However UKOPA has presented (and HSE have accepted) that the inner zone pool radius is related to pipeline throughput (and therefore diameter) and that the resulting inner zone various from 20m to 40m.