

UKOPA**UNITED KINGDOM ONSHORE PIPELINES OPERATORS' ASSOCIATION****Proposed Amendments to the Pipelines Safety Regulations 1996
Requiring the Testing of Pipeline Emergency Plans****A Note by the Chairman of the Emergency Planning Work Group****1. INTRODUCTION**

UKOPA considers that, if ratified, the proposed amendments and supporting guidance to the Pipelines Safety Regulations 1996 requiring testing of emergency plans do not provide sufficient direction to ensure a consistent and cost effective approach to such activity. UKOPA also considers that this view has been demonstrated in extensive discussions with the HSE and representatives of Local Authority Emergency Planning Groups at meetings of the Pipelines Emergency Planning Forum.

Following review of the results of a pilot test carried out on 1st July 1999, and in order to ensure an equitable and cost effective approach, UKOPA concluded that testing of emergency plans relating to pipelines, should be confined to pipeline specific issues based on a desk-top approach, and carried out on a national basis over defined geographical areas.

As a result, and because Local Authority Emergency Planning representatives who attend the Pipelines Emergency Planning Forum are not able to agree principles on behalf of all Authorities, UKOPA considered it appropriate to write to all Emergency Planning Authorities to request their views on:

- i) Desk-top testing carried out over a defined geographic area, and
- ii) Support for a national schedule of tests.

Transco, the operator most significantly affected by the proposed amendments, had concerns regarding the differences in their interpretation. Transco supported the UKOPA approach and, in parallel, wrote to all Local Authorities requesting views on:

- iii) The geographic area being defined in accordance with Transco LDZ boundaries, and
- iv) An alternative definition of a geographic area.

2. RESPONSES

The UKOPA letter and responses received are included in Appendix A. The Transco letter and responses received are included in Appendix B.

3. DISCUSSION

It is not intended to deal in detail with individual responses. In many cases, the specific questions were not addressed directly. In some cases, the responses only partially covered the queries. In other cases, the responses raised further queries. Nevertheless, the responses have been reviewed to obtain some indication of Local Authority views with respect to the questions raised. These responses are summarized in Tables 1 and 2 below.

Table 1

<u>SUPPORT FOR DESK TOP TESTING</u>				
	YES	PART	NOT SPECIFIC	NO
No.	20	5	21	5
%	39	10	41	10

Table 2

<u>SUPPORT FOR NATIONAL SCHEDULE OF TESTS</u>			
	YES – LDZ BOUNDARY	YES – OTHER BOUNDARY	NO
No.	4	36	11
%	8	71	21

A total of 131 letters were issued, and 51 responses received.

Some Authorities did not respond to the questions directly. 20 of the 51 responses received confirmed support for desk-top testing, 5 provided a positive indication but did not clearly confirm. Only 4 out of the 51 responses supported a

national schedule of tests based on LDZ boundaries, but 36 out of the 51 responses indicated some level of support for an alternative geographic area. 12 of the 36 responses suggested Police Authority boundaries.

It is notable that some Authorities considered plans should be tested on a one-Authority basis. If this is established as “best value”, it will result in a minimum of 150 tests every 3 years. Transco has identified that in this case, additional resources would be needed to support the workload. Emergency Services representatives at PEPF also indicated that the potential workload would impact on their operational resource levels.

4. **CONCLUSIONS**

- i) The wide range of responses received clearly support UKOPA’s concerns regarding the differences in interpretation and understanding of the requirements of the proposed amendments.
- ii) Answers were not comprehensive but indicated general agreement for desk-top testing and a high level agreement for definition of geographic areas for testing.
- iii) The wide variation in responses clearly demonstrate high potential for conflict between stakeholders who currently have a good working relationship unless best value is clearly established.
- iv) The responses clearly demonstrate that the current wording of both the amendments to the Regulations and supporting guidance requires clarification to ensure a consistent and cost effective approach.
- v) Clarification is required in the wording of both the Regulations and the guidance.
- vi) The resource and cost implications of the proposed amendments are not understood by other stakeholders.

Footnote

The above note takes no account of, and has been prepared in isolation to, the UKOPA recommendations that:

- i) An equitable and comprehensive regime for the testing of emergency plans covering all fixed and distributed assets in the UK is required, and

- ii) The regime should be centrally co-ordinated, funded by all asset groups/industries, and tests should be scheduled locally in accordance with a national programme.
- iii) Testing of pipeline emergency plans should be restricted to pipeline specific issues, which require clear definition.
- iv) A Regulatory Impact Assessment is needed.

5. RECOMMENDATIONS

- i) Further work is justified to clarify the issues associated with testing of emergency plans for pipelines.
- ii) An ACOP is required before the amendments are enacted.
- iii) The impact of the amendments on pipeline operator and emergency service resource levels requires further investigation and understanding.

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