

Charles Wagg,
Health and Safety Executive
Safety Policy Directorate
Nuclear and Hazardous Installations Policy Division E
Room 110 Daniel House
Trinity Road
Bootle
Merseyside L20 3TW.

May 17th 2002.

Dear Mr Wagg,

Response to Proposed Dangerous Substances and Explosive Atmospheres
Regulations (DSEAR)

Proposed Implementation of DSEAR

The United Kingdom On-Shore Pipeline Operators' Association (UKOPA) does not have any fundamental objections to the proposed Regulations provided that a practical approach is applied in their implementation.

In order to comply with DSEAR, the overall approach that UKOPA Members will adopt will be determined by the workplace and the risk it may pose to the worker or public

For more complex sites such as production facilities and sites where more than 5 workers may be present, it is proposed to produce a site specific risk assessment and site specific hazardous area documentation.

For less complex sites such as block valve sites, sites operating at lower pressures and sites that present 'little' risk, it is proposed that, wherever possible, a generic risk assessment and generic zoning drawings (showing the maximum extent of zones) will be produced. Where it is not possible to produce truly generic documents for particular sites then a site specific assessment/zoning will be applied.

It is proposed that signs will be installed based on an assessment of whether the installation of the sign will reduce the risk. For more complex sites ie. those where general access to the public is restricted, a single sign at site entrance will be installed (training, experience and a permitry system will alert persons to any risk). For sites that are generally accessible by the public, (eg. district governors), signs will not be installed because making the public aware that they have access to a potentially explosive atmosphere may increase the risk of vandalism and terrorism.

If you do not believe that this approach is an acceptable one for the implementation of DSEAR as currently written, then we strongly suggest that appropriate amendments are made to the proposed Regulations to facilitate such an approach.

Yours Sincerely,

W. P. Jones

Secretary UKOPA.