

United Kingdom Onshore Pipeline Operators' Association

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Mr Jim Stancliffe
Head of National Inspection and Operational Support Team
HID SI3 Gas & Pipelines Unit
Health and Safety Executive
Edgar Allen House,
241 Glossop Road,
Sheffield
S10 2GW

Dear Jim,

Re Amendments to PSR Regulations 26 – 29, Testing of and Charging for Testing of Pipeline Emergency Plans

Karen McDonough and Lyndsey Bennett attended the UKOPA Emergency Planning Working Group (EPWG) meeting on 8th September to provide feedback on comments received during informal consultation and give an update on progress regarding the amendments relating to testing of and charging for testing of pipeline emergency plans. Karen and Lyndsey informed EPWG that HSE's consultation with industry (UKOPA) and LAs has confirmed that the testing of and charging for testing of emergency plans is problematic and a consensus to the approach to be taken in revising the regulations is not possible at this stage. They stated that the following 3 options are being considered by HSE:-

- i) Postponing the inclusion of these duties pending further research to identify a practical approach.
- ii) Including the requirement for testing only.
- iii) Stating in the guidance that testing is good practice.

From discussions at EPWG I understand that HSE's preference is for option 1.

As Chairman of UKOPA I am writing to confirm that UKOPA considers this to be positive development. Should Option 1 be progressed, UKOPA is keen to work pro-actively with HSE and LAs to identify an appropriate and practical approach which is acceptable to all parties. In particular, we are keen to explore more strategic alternatives which may avoid placing duties at the working level in each Local Authority. I would like to discuss with you how UKOPA can work with HSE on this matter when we meet at the UKOPA meeting in October.

Yours sincerely,

David Dickson

Chairman of UKOPA