



United Kingdom Onshore Pipeline Operators' Association

UKOPA/11/0056

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PIPELINE RISK ASSESSMENT ISSUES

As evidenced by failure data collected by organisations such as EGIG (European Pipeline data Incident Group), CONCAWE and UKOPA itself, self regulation has proved to be very effective in improving the safety performance of European pipeline operators. The introduction of any additional legislative requirements must therefore be supported by robust cost benefit justification. UKOPA does not believe that the COWI study justifies a case for additional legislation.

UKOPA believe that improvements in pipeline safety are best facilitated by ensuring that pipeline operators have appropriate Safety Management System (SMS) covering the management of pipeline integrity and the management of emergencies. Rather than introducing additional legislation for pipeline operators the focus should be on ensuring that pipeline operators communicate and adopt current good practice. This should be through encouraging participation in industry groups such as UKOPA and CONCAWE and the production and adoption of appropriate industry standards.

Pipeline safety can also be further improved by addressing third party interference. Although pipeline operators can contribute to tackling the problem of third party interference, a large part of the activities occurring in the vicinity of pipelines are outside of their control. The focus of any new requirements to improve pipeline safety should therefore be on improving awareness of buried utility infrastructure and controlling the competence of individuals carrying out excavation work in the vicinity of buried pipelines.

Future research and development is also key to ensuring that the pipeline industry can continue to maintain high levels of safety for its infrastructure. The EU should therefore incentivise companies to invest in and share appropriate technical research to reduce the likelihood of pipeline failures.

Of the 3 options presented in the COWI report:

1. Develop recommendations/guidelines (not legally binding) ;
2. Amend the Seveso III Directive to include pipeline transport and;
3. Adopt a pipeline safety directive.

UKOPA would support option 1 which is in line with the comments that we have made in the paragraphs above.

Yours faithfully

Neil Jackson

UKOPA Chairman