MAPPD (Major Accident Prevention Policy Document)

Document Ref No. STO.UK-SHEQ-POL-001

Function: SHEQ
Document Type: Policy
Document Classification: Public
Document Owner: Shaun Sagar

Version	Issue Date	Details of amendment(s) to policy	Written by	Checked by	Approved by
A11	21/01/2021	Annual review and format revision	JB	GC	MG
A12	26/03/2021	Update from MAPP to MAPPD	SG	JB/GC	MG
A13	31/01/2022	Annual Review of new document	SAS	GC	MG
A14	01/08/2022	No changes – update for new MD	SAS	GC	A-LC
A15	17/01/2023	Review and updates – reflect update to personnel changes and Human Factors	SAS	GC	A-LC

This document is reviewed annually to ensure relevance, accuracy and compliance.

Major Accident Prevention Policy Document (MAPPD)

Storengy UK (SUK) recognises the potential for major accidents to occur from its operations and is committed to providing the highest level of protection to its employees, contractors, visitors, neighbours, and the environment.

This policy covers the Control of Major Accident Hazards (COMAH 2015) requirement for a Major Accident Prevention Policy and the Pipeline Safety Regulations (PSR 1996) requirement for a Major Accident Prevention Document (MAPD). As the PSR Link Line falls within the curtilage of the COMAH site it is appropriate to merge these two documents.

Guiding Principles:
SUK believes that all major accidents are preventable and is committed to carrying out regular reviews of its operations for major hazard potential and to seek improvements to achieve this objective.

SUK will ensure so far as is reasonably practicable that the likelihood of a major accident is reduced to as low as is reasonably practicable (ALARP) by:

1. Organisation and Personnel

The SUK Board of Directors are ultimately accountable for all aspects of Health and Safety for SUK. Major Accident Hazard responsibilities are delegated to the Head of Operations, who is supported by Managers and leaders from all relative functional site teams.

Ensuring that an effective organisation exists for the management of major hazards, and the responsibilities for the management of major hazards, are clearly defined as providing leadership, commitment, and accountability. This is delivered through the selection of suitably competent and experienced personnel who are regularly trained in the management of major hazards.

Personnel are recruited by SUK based on their academic achievements, experience and behaviours.
Ensuring sufficient competent resources are provided as necessary to implement the Safety Management System (SMS), particularly with respect to the management and control of major accident hazards.

The participation, co-operation, and communication between all levels of the organisation, including contractors, are actively encouraged to drive a culture of continuous improvement in safety performance.

All job roles within SUK have a detailed job description with an accompanying RACI matrix defining key responsibilities and accountabilities for all aspects of Major Accident Hazard management.

2. Identification and Evaluation of Major Hazards

Defining arrangements for periodic and systematic identification and evaluation of the major hazards that arise at all stages in the life cycle of any plant; including construction, commissioning, normal, and abnormal operations, shutdowns and decommissioning with the aim of ensuring major accident hazard risks are assessed and reduced to ALARP.

The site risk register, HAZID, and Major Accident Hazard scenarios are reviewed periodically in line with the update of the COMAH Safety Report. Quantitative risk assessment for all MAH's are re-assessed for each COMAH Safety Report update.

Safety Critical tasks relating to the operation, maintenance and inspection of site equipment have been identified against SUK's MAH's, evaluated and risk ranked through a process of Safety Critical Task Analysis and are subject to an ongoing Human Reliability Review programme to ensure the risks are reduced to ALARP.

3. Operational Control

Providing and maintaining a SMS for delivering the details set out within this MAPPD, seeking to prevent major accidents within the COMAH plant or PSR pipeline, and to mitigate their effects.

Generate documented procedures and instructions for the safe operation and maintenance of plant, processes, and equipment at all times throughout the operating life of the facility, and periodically reviewing to ensure adequacy in the control of major accident hazards.

Engaging with competent contractors by rigorous selection, assessment, control, and continual monitoring of performance.

4. Management of Change

Identifying hazards in the design of new installations, organisational change, and the careful control of modifications to existing equipment, with change processes that are strictly adhered to with the aim of ensuring major hazard risks are reduced to ALARP.

SUK have robust procedures pertaining to the control of change. All changes are considered and recorded having been categorised as minor or major, permanent, or temporary. The purpose of any change is described within the impact assessment, directing the change initiator to an appropriate risk assessment tool, ranging from a full HAZOP to a Technical Safety Assessment. Risk mitigation is put in place and approvals are authorised using the Site Controlled Modification Form. All stage gates require authorisation and approval from the Head of Operations.

5. Planning for Emergencies

Identifying foreseeable site emergencies by systematic analysis to prepare, periodically review and test emergency plans. With the emergency plans involving measures of protection, alert and intervention designed to minimise the effects of major accidents (including potential domino effects).

All key personnel are suitably trained and regularly tested in the response to site emergencies. An emergency response team provide 24-hour cover to site consisting of a First Responder, Duty Manager, Incident Controller and Deputy Incident Controller. All must be available to attend site at short notice.

6. Monitoring and Performance

Safety and environmental performance are continually monitored in order to assess compliance with the requirements set out in the MAPPD and the SMS. This includes active and reactive monitoring together with auditing to identify and then implement suitable corrective actions in a planned and transparent approach to deliver continuous improvement.

7. Audit and Review

A formal periodic review of the MAPPD and the effectiveness and suitability of the SMS is carried out by the Senior Management Team to a defined schedule.

The SUK audit programme targets reviews across all areas of the SMS ensuring the adequacy of the various controlling elements are effective in reducing the risks posed from MAH's.

Corrective actions are tracked through to completion and reported on a regular basis at senior management level. A formal management review is completed on an annual basis covering policy updates, incident statistics, corrective actions, emergency planning and proactive SHEQ management.

Signed:

Anne-Laure Chassanite
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Anne-Laure Chassanite, Managing Director

Date: 1/18/2023