COMAH-regulated organisations are subject to a range of specialist inspections by the Competent Authority (CA). These require organisations to have robust plans to ensure that good / best practice in each of the topic areas is being consistently achieved.

Coverage of each of the topic areas requires subject matter expertise to interpret CA expectations and implement suitable systems and procedures. Is the appropriate level of subject matter expertise available to you?

ABB provides comprehensive support to COMAH operators across the current HSE strategic topic areas:

- Human factors
- Emergency plan (on-site and off-site)
- Key Performance Indicators (KPI’s)
- Overfill protection
- Electrical, control and instrumentation
- Ageing plant

The UK’s HSE prioritises its inspection of COMAH facilities based on a combination of the Major Accident Hazard (MAH) profile of a site and the site’s performance across the selected strategic topic areas. Each strategic topic inspection is based on a delivery guide, providing guidance for HSE inspectors on standards and what industry should be demonstrating as well as details of the scoring system to be applied.

As can be seen in figure 1 overleaf, the topic areas are diverse and require clarity in understanding HSE expectations, what is being asked, and an interpretation of the scoring basis to develop performance improvement programmes.

A poor score is likely to lead to more regular inspections and targeted interventions to improve performance. Therefore, it’s important to develop a clear strategy and programme of work.
What we deliver

ABB provides expert advice across all aspects of COMAH and as a technical engineering consultancy we are able to draw on subject matter expertise support covering all of the strategic topic areas.

Our consultants have vast major accident hazard-related operations and engineering experience and support clients in COMAH. We help our clients by:

- Undertaking gap analyses across the COMAH strategic topic areas to identify areas for improvement to meet HSE strategic topic expectations
- Through our gap analyses we define and develop prioritised intervention programmes to help achieve improvement in performance. We can advise clients on intervention or implement solutions, if required
- Facilitating workshops and providing technical training across the strategic topic areas

Benefits

ABB helps its clients to:

- Improve performance against the strategic topic scoring criteria to better meet HSE’s expectations through the deployment of ABB’s subject matter experts across the topic areas
- Develop clear prioritised programmes of work to improve scoring but also to improve overall process safety performance

Why ABB?

The strategic topic areas are wide reaching in terms of the personnel and functions required to be involved within organisations. Many operators do not have this level of resource internally. ABB’s subject matter experts are able to draw on vast COMAH-related experience and a clear understanding of HSE’s strategic topic expectations to help our clients improve process safety performance and meet HSE’s expectations.

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Figure 1: Delivery guide performance standards.

<table>
<thead>
<tr>
<th>Performance rating</th>
<th>Description</th>
<th>Score</th>
</tr>
</thead>
<tbody>
<tr>
<td>Exemplary</td>
<td>Good practice of above in all respects. All success criteria met. Quality indicators have been set against the critical elements of the control being inspected. The company understands what the information is telling them and acts upon this information as appropriate. All other good practice (appendix 1) is followed.</td>
<td>10</td>
</tr>
<tr>
<td>Good</td>
<td>Good practice in most respects. Most success criteria met. The company has indicators set against the critical elements of the control being inspected. The information is understood and acts upon this. However, the company does not fully meet the good practice outlined in appendix 1 in one or two areas.</td>
<td>20</td>
</tr>
<tr>
<td>Broadly compliant</td>
<td>The majority of the success criteria are met. The company understands the importance of having KPIs and has implemented their use, but need to improve in certain areas</td>
<td>30</td>
</tr>
<tr>
<td>Poor</td>
<td>Many of the success criteria not met or not fully met. The company have not met some of the key success criteria, e.g. have indicators in place but have gaps in terms of ensuring of control or have good indicators in place but are not using the information they provide effectively.</td>
<td>40</td>
</tr>
<tr>
<td>Very poor</td>
<td>Majority of success criteria not met or not fully met. The company has patchy performance indicators in place, but don’t understand their relevance and the good practice in appendix 1 is not being followed.</td>
<td>50</td>
</tr>
<tr>
<td>Unacceptable</td>
<td>None of the success criteria met. The company have no indicators in place; do not know if any of their critical controls are operating effectively and so how close to having major incident they are.</td>
<td>60</td>
</tr>
</tbody>
</table>