



COMAH Emergency Response:

Are we prepared for the unthinkable?

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Mitigating Major Accidents the COMAH way

- What does COMAH aim to achieve?
- What's the evidence that COMAH is working?
- Spotlighting areas for improvement
- Work in progress – watch out for future guidance and training



COMAH seeks a high level of protection for people and the environment

“The assessment of risks posed by a site should provide the necessary foresight to develop response plans.”

Buncefield: Why did it happen? (CA, 2011)

Buncefield learning has undoubtedly led to improvements in emergency response

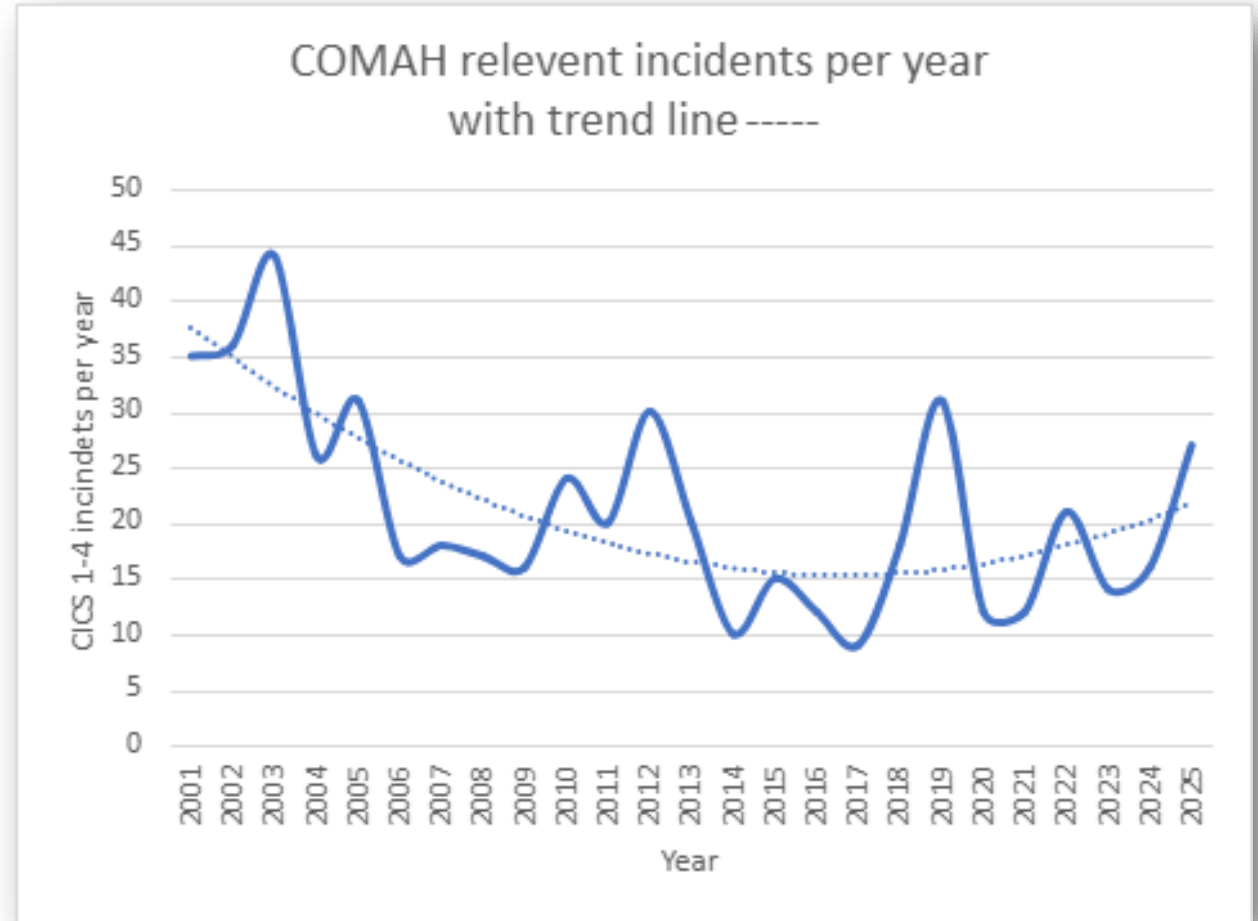


Occurrence of incidents – a lagging indicator

MATTEs - There are far fewer and less severe Major Accidents to the Environment today, compared to COMAH's early years, however...

EA incident response data shows the decline in near misses and precursors now appears to be, uncomfortably, in reverse....

... We need to be ready to respond.



How prepared are we? What risks do we have.

Key findings from 140 Loss of Primary Containment inspections (to end July 26)

- Not all sites have an up-to-date emergency plan – **4% don't!**
- **Approximately half** of domino sites **do not have arrangements in place for coordination and shared planning**
- **1 in 5** establishments **lack clear trigger points** for putting emergency plans into effect
- **2 in 3** plans **do not include the requirement to contact the EA**, on the confidential number we have provided to operators when plans are initiated
- **3 in 4** establishments **do not have sufficient scripted initial alert text**
(A clear message based on METHANE and indicating activation of COMAH site plans)

How prepared are we continued

- **Not all emergency plans are being tested**, reviewed / revised as required
- **4 in 10** planned exercises **don't involve key stakeholders** (e.g. spill responders)
- **3 in 4** establishments **do not have local or national mutual aid agreements** established for sharing firefighting foam, containment/other resources
- **Over half** of planned tests **have not included scenarios based on emergent threats** (Natechs, cyber threats, digitalisation issues etc)
- **Significant gaps** have been identified **in training and competence**

Summer 2026 : Exceptional risk of escalating wildfires



Credit : HIWFRS



England and Wales CROW Access Fire Severity Index Maps



Emergency arrangements : A continuing CA inspection priority

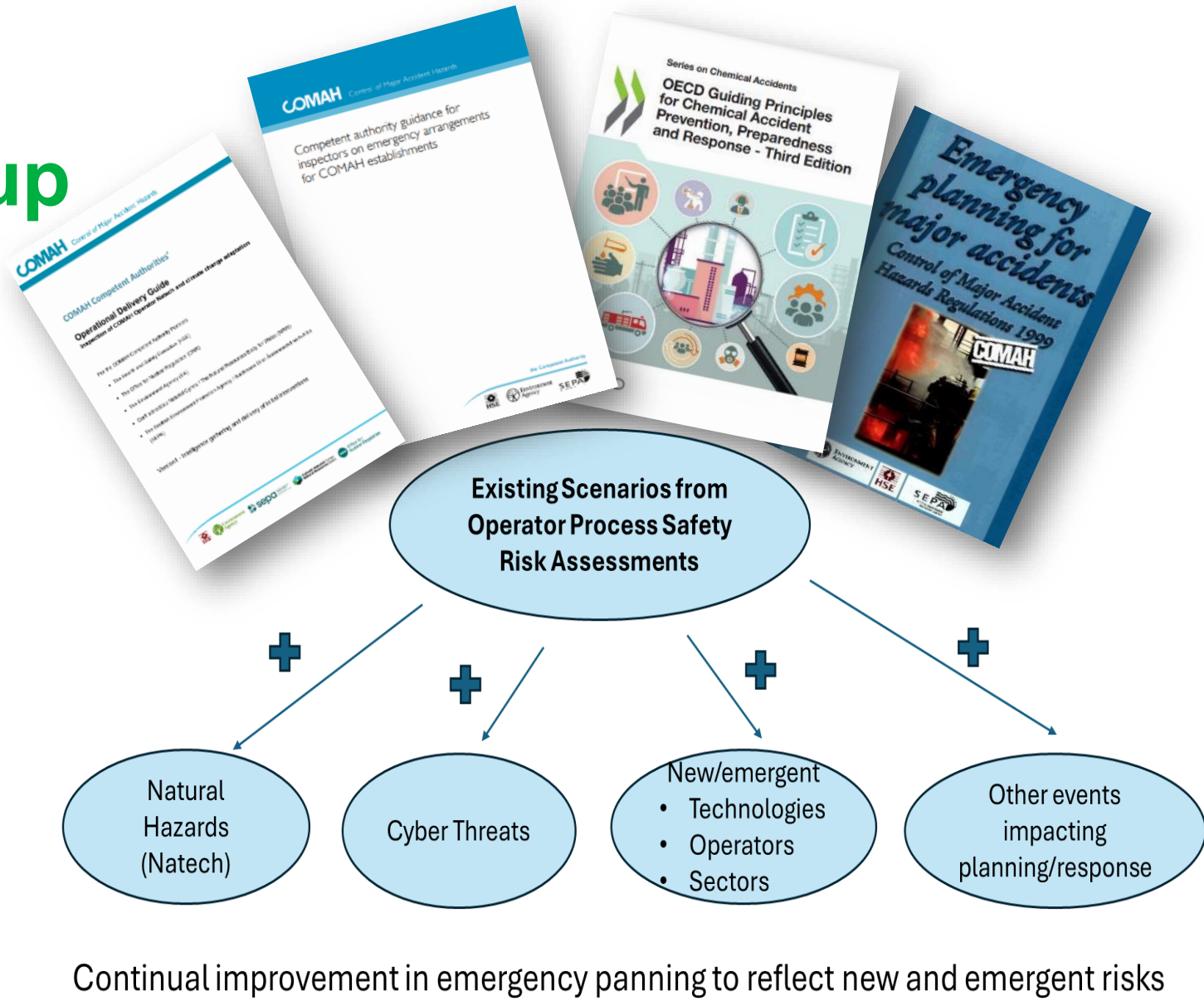
- Seeking improvement in emergency arrangements to:
 - Ensure Compliance
 - Implementation of Good Practice
- Planning and response measures integral to management systems and put into effect on precautionary basis



*So that our PPE stays
hung on the peg!*

CSF Emergency Planning working group

- Focusing on traditional process safety incidents (people, process, plant) may overlook new risks
- CSF guidance on emergent threats is near the point for CSF publication.
- Work now focused on review of HSG191 to gather evidence of key changes that need to be highlighted – WG currently propose a CSF key changes publication



MANAGEMENT OF CHANGE

SAFE CHANGE • CONTROLLED CHANGE • SUSTAINABLE CHANGE



EXTERNAL CHANGES

EXTREME WEATHER

- Increasing Severity & Frequency
- Flooding
- High Winds
- Heat Waves
- Drought & Water Stress

CYBER THREATS

- Ransomware
- Phishing & Social Engineering
- Unauthorised Access
- Data Integrity
- Disruption of Operations

**SAFE RESILIENT
NET ZERO**

DIFFERENT EMERGENCY RESPONSE APPROACHES

MINOR EVENT (LOCAL RESPONSE)	MAJOR EVENT (PLANT RESPONSE)	SITE-WIDE / OFFSITE (EMERGENCY SERVICES)	BUSINESS CONTINUITY (CRISIS MANAGEMENT)
Trained Staff On-site Resources Manage & Recover	Activate ERT Additional Resources Contain & Stabilize	External Support Multi-Agency Community Protection	Protect People Maintain Critical Ops Recover & Learn

ALERT → **ASSESS** → **RESPOND** → **RECOVER** → **LEARN**

ENABLERS OF EFFECTIVE MANAGEMENT OF CHANGE

STRONG LEADERSHIP & COMMITMENT	RISK-BASED DECISIONS	COMPETENT PEOPLE	ROBUST PROCESSES & TOOLS	ASSURANCE & VERIFICATION
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OUR GOAL: NO UNPLANNED CONSEQUENCES
Protect People • Protect the Environment • Protect Assets • Ensure Business Continuity

THE RIGHT CHANGE • AT THE RIGHT TIME • FOR THE RIGHT REASONS • IN THE RIGHT WAY

Senior leaders, what keeps you awake at night?

Don't just test your emergency plans....

Think the unthinkable!

... stress test your plans.

Fix them where they break.



Climate Resilience Leadership For Senior Executives

New training for senior leaders in high-hazard and regulated industries

- Industry and Regulators identified a need to strengthen understanding and competence around climate resilience across COMAH and environmentally permitted sites.
- Developed by **Cogent Skills Safety Culture Solutions** aligned to the new **Climate Resilience Leadership for Senior Executives Training Standard** from the **Process Safety Management Competence Programme Board**
- This new course will help senior leaders understand climate-related risks, strengthen organisational resilience and prepare their businesses for a changing climate.
- **Scan the QR code to find out more about the Climate Resilience Leadership course:**

