

Preliminary consultation into the recommendations of the Gill Report on the 2004 ICL Plastics explosion

Effect on the supply and use of LPG in Great Britain and the wider health and safety system

This consultative document is issued by the Health and Safety Executive in compliance with its duty to consult under section 50(3) of the Health and Safety at Work etc Act 1974.

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to reach there no later than **19 November 2009**

The Executive tries to make its consultation procedure as thorough and open as possible. Responses to this consultative document will be lodged with the Health and Safety Executive's Knowledge Centre after the close of the consultation period where they can be inspected by members of the public or be copied to them on payment of the appropriate fee to cover costs.

Responses to this consultative document are invited on the basis that anyone submitting them agrees to their response being dealt with in this way. Responses, or part of them, will be withheld from the Knowledge Centre only at the express request of the person making them. In such cases, a note will be put in the index to the responses identifying those who have commented and have asked that their views, or part of them, be treated as confidential.

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Preface

How to respond

- Complete the online questionnaire at: <http://www.hse.gov.uk/lpgconsultation>.
- Fill in a questionnaire in Word format available from the above web address.
- Make a written response in whatever format you wish.
- Respond by e-mail to lpg.consultation@hse.gsi.gov.uk.

Whichever method you use, you do not have to restrict your response to the specific questions highlighted in the document and reproduced in the questionnaire. If there are issues not covered in the questionnaire but which you wish to raise, you are free to do so.

Responses must be received by 19 November 2009. All responses will be acknowledged and a summary of the main issues raised will be produced once the consultation period has been completed.

Other formats

If you are reading this document on a computer screen and would prefer a printed version, or require a more accessible format, an Executive Summary is available in Braille, large print, audio formats (eg CD, audiocassette tape) or in other languages. Please contact HSE's Infoline on 0845 345 0055, or write to HSE Information Services, Caerphilly Business Park, Caerphilly, CF83 3GG.

Code of Practice on consultation

HSE is committed to best practice in consultation and to the Government's Code of Practice on consultation. The Code of Practice sets out seven criteria for consultation. These are:

- when to consult. Formal consultation should take place at a stage when there is scope to influence the policy outcome;
- duration. Consultations should normally last for at least 12 weeks with consideration given to longer timescales where feasible and sensible;
- clarity of scope and impact. Consultation documents should be clear about the consultation process, what is being proposed, the scope to influence and the expected costs and benefits of the proposals;
- accessibility. Consultation exercises should be designed to be accessible to, and clearly targeted at, those people the exercise is intended to reach;
- the burden of consultation. Keeping the burden of the consultation to a minimum is essential if consultations are to be effective and if consultees' buy-in to the process is to be obtained;
- responsiveness. Consultation responses should be analysed carefully and clear feedback should be provided following the consultation; and
- capacity to consult. Officials running consultations should seek guidance in how to run an effective consultation exercise and share what they have learned from the experience.

If you believe that this document, or the consultation on these proposals, does not meet these criteria, or if you are not satisfied with the way in which this consultation exercise has been conducted, we want to know and put things right. Please contact Maureen Kirwan, HSE, 5S.3, Redgrave Court, Merton Road, Bootle, Merseyside LS20 7HS.

We aim to reply to all complaints within 10 working days. If you are not satisfied with the response, you may ask for your complaint to be passed to a more senior member of staff. Following our second response, if you are still not satisfied, you can ask for your complaint to be referred to the Chief Executive.

Introduction

In May 2004 a large explosion at a factory owned by ICL Plastics Ltd in Glasgow resulted in the deaths of nine people and injuries, some critical, to 33 more. The explosion was caused by a leak, into the basement of the factory, of liquefied petroleum gas (LPG) from a corroded underground metal pipe. When the leaked LPG ignited, the explosion caused the four-storey factory to collapse.

ICL Plastics used LPG as a fuel source in some of its processes. However, since the LPG pipe was first installed, the factory and its yard had been subject to a number of structural modifications. These, together with the lack of pipework maintenance, contributed ultimately to the explosion.

Two companies (ICL Tech Limited and ICL Plastics Ltd) pleaded guilty to breaches of the Health and Safety at Work etc Act 1974 and were fined £200 000 each.

An inquiry was also held into the circumstances leading to the disaster. The inquiry was conducted by Lord Gill and focused on the issue of the service pipework between the tank and the premises to which it was supplying. It also looked at how LPG pipework should be installed and maintained on industrial and commercial premises.

The Gill Report

The inquiry report was published on 16 July 2009 and is available at http://www.theiclinquiry.org/Documents/Documents/HC838ICL_Inquiry_Report.pdf. It had at its core the following five principles:

- All underground metallic pipework between LPG bulk tanks and buildings on industrial/commercial premises should be replaced with polyethylene pipework. This should take place on a prioritised basis.
- All buildings that have a bulk LPG supply should be inspected to identify if there are any hazardous features of the pipework layout or of the building structure itself, given that it has a bulk LPG supply.
- A new safety regime should be put in place governing the installation, maintenance, monitoring and replacement of all LPG systems.
- A new scheme should be introduced that would require all LPG suppliers to be registered and accredited.
- The current risk assessment system should be improved by the addition of an independent audit process.

The principles comprised a series of specific recommendations, which are listed in Annex 1 of this document.

About this document

This document is the first part of the Health and Safety Executive's (HSE's) response to Lord Gill's report (referred to as 'the Gill Report' or 'the Report'). It asks interested parties and stakeholders in the LPG industry to give their initial views on the Gill Report's core principles. Because these principles would apply to **all** installations where LPG is used as a fuel source – from industrial premises to commercial properties (eg pubs, hotels, care homes) – we are seeking the views of any business or sector which uses LPG.

However, we are also asking others for their views. This is because we believe that these principles – and some of the Gill Report's recommendations – raise broader issues that logically

could apply to a range of hazards, not just LPG. For example, the Report's suggestion that an independent audit process should be part of risk assessment does not specify that this is only for LPG users. Also, the suggestion of increased inspection for buildings to identify if there are hazardous features of pipework could apply to other materials than LPG.

We are therefore also seeking views from the wider business community and those with an interest in the health and safety system.

We will analyse the responses we receive to help shape our overall response to the Gill Report and prepare our proposals on how to implement the Report's recommendations. These proposals – and the accompanying impact assessment – will then be the subject of a further consultation.

Exclusions from this consultation

It is important to note that some of the Gill Report's recommendations are already being addressed. In advance of the report, HSE and UKLPG (the representative body for the LPG industry) had already developed a high-level plan to replace underground metallic pipework carrying LPG in England, Scotland and Wales. This will see all underground metallic pipework at industrial and commercial premises replaced by polyethylene pipework by 2015, or by 2013 for higher risk premises.

This programme also addresses underground metallic pipework to domestic premises, which was not in the scope of the Gill inquiry. Further details of the programme are provided in Annex 2.

Because this programme is already underway, we are not seeking views on this part of the Gill Report.

The existing regulatory framework

While some readers will be familiar with health and safety law, and particularly that which currently applies to LPG, others will not. This section therefore summarises the existing regulatory framework.

The fundamental principle of health and safety in the UK (as set out in the Health and Safety at Work etc Act 1974) is that any employer that creates a risk in the course of carrying out their work is responsible for controlling that risk and for protecting workers and others, including the public, who may be affected. This means that employers that create risks have a duty to understand, assess and control the risks relating to their workplace so far as is reasonably practicable.

The Health and Safety at Work etc Act is supported by secondary legislation such as:

- the Management of Health and Safety at Work Regulations 1999 (see below); and
- a range of regulations dealing with **specific** workplace health and safety hazards (eg from musculoskeletal disorders through to the use of chemical and physical agents).

Beyond this, there are also regimes that are tailored to the nature of the risks being regulated.

At one end of the spectrum are so-called 'permissioning' regimes. These regimes operate in sectors where hazards are inherently high, such as nuclear, offshore and onshore oil and gas, and chemical industries. In a permissioning regime, any organisation that wishes to carry out a particular activity must get consent, a licence, or a letter of conclusion or acceptance from the health and safety regulator. This will require the submission of a detailed safety case or report, and organisations that gain permission are likely to be subject to regular inspections.

At the other end of the spectrum are purely voluntary schemes, often developed within an industry to promote safe working. An example is the scheme developed by the fairground industry for fairground rides to be inspected by competent persons and for records to be kept.

In between fully-fledged permissioning and entirely voluntary schemes there are other regimes which require an initial permission or approval to carry out an activity, but this does not involve the submission or approval of lengthy and detailed safety cases. These apply in industries such as petrol licensing, asbestos removal and domestic gas appliance maintenance.

The regulatory framework for LPG

In relation to the use of LPG other specific health and safety legislation also applies, including:

- the Dangerous Substances and Explosive Atmospheres Regulations 2002, which aim to prevent risks, primarily from fire and explosion;
- the Pressure Systems Safety Regulations 2000 which aim to prevent risks from systems, including pipelines, carrying liquids or gases at pressure;
- the Provision and Use of Work Equipment Regulations 1998 which aim to prevent risks from any work equipment by ensuring that it is properly selected, maintained and inspected; and
- the Management of Health and Safety at Work Regulations 1999 (the Management Regulations), which require all risks to be assessed. This is discussed in more detail below.

The principle of risk assessment

As outlined above, the first step in complying with the general duties of the Health and Safety at Work etc Act is risk assessment. The Management Regulations make it clear that employers (and the self-employed) are required to carry out a risk assessment, which in turn determines the measures needed to comply with health and safety legislation.

Regulation 3 of the Management Regulations states:

3. (1) *Every employer shall make a suitable and sufficient assessment of –*
- (a) *the risks to the health and safety of his employees to which they are exposed whilst they are at work; and*
 - (b) *the risks to the health and safety of persons not in his employment arising out of or in connection with the conduct by him of his undertaking,*

for the purpose of identifying the measures he needs to take to comply with the requirements and prohibitions imposed upon him by or under the relevant statutory provisions and by Part II of the Fire Precautions (Workplace) Regulations 1997.

Consultation

In answering each question, one of the issues consultees will wish to address is the proportionality of the proposed measure and how it would fit within the established GB health and safety system.

For consultation: The current risk assessment system should be improved by the addition of an independent audit process

The Gill Report endorses the view that the user of LPG at a site is primarily responsible for its safety, as they create the risk by bringing it onto their land. The organisation is therefore responsible for the risk assessment and control that are required under the legislation outlined above.

However, the Report expresses concerns about the quality of risk assessments that are undertaken in relation to LPG installations. It states:

'This case has demonstrated the weakness of the risk assessment process. The regulations merely oblige the employer to carry out an assessment. They do not provide any safeguard that will ensure that the assessment is properly carried out by a competent person; or that it is subject to any form of independent expert audit.' (p 141)

Therefore, the Report suggests that:

'Ministers should consider whether the existing regulations on risk assessment could be made more effective, perhaps by the addition of some form of independent safety audit.' (p 141)

The introduction of an independent safety audit would mean changing current practice. Logically, it would not just apply to the storage and use of LPG, but also to risk assessments performed for all workplaces and all work activities.

We are therefore seeking views from a broad range of stakeholders on the introduction of an independent safety audit of risk assessment.

Questions

1 What are your views on the introduction of some form of independent safety audit:

- (a) for LPG?*
- (b) more generally?*

2 What do you think are the practical implications of introducing an independent safety audit:

- (a) for LPG?*
- (b) more generally?*

Please give your reasons.

For consultation: A new safety regime should be put in place governing the installation, maintenance, monitoring and replacement of all LPG systems

The Gill Report proposes a new safety regime for LPG installations that would introduce new requirements on both LPG suppliers and users, backed by legal sanction.

A summary of these requirements is:

- The supply of LPG should be conditional on the accreditation and registration of LPG supply companies.
- All LPG users should have an installation record which includes a description of the installation, its history including modifications, maintenance and inspections, a record of legal responsibilities and a valid verification certificate.
- There should be third-party assessment by an approved competent person (ACP) of user installations and verification of the installation integrity for safe use.
- Supplying, obtaining or using LPG for an installation which does not have a valid verification certificate would be illegal.

Figure 1 shows the proposed new safety regime for LPG.

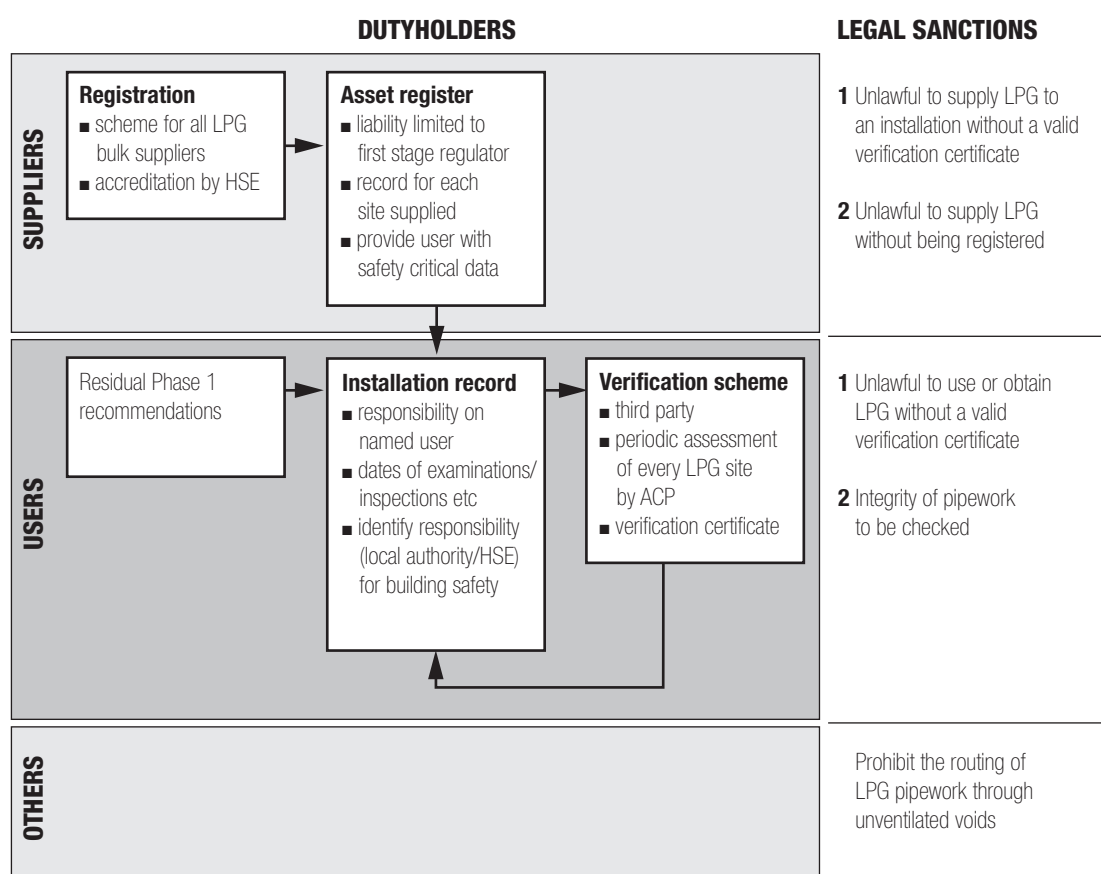


Figure 1 The proposed new safety regime

In the next sections, we ask further questions about specific elements of this proposed regime. This question, however, relates to the overall regime.

Questions in relation to the proposed new safety regime

Introducing a new safety regime that requires any LPG supplier to have an accredited registration and any LPG user to have a verification certificate would mean introducing a system with elements similar to those of permissioning regimes outlined above.

3 *What are your views on introducing this type of regime for the control of risks from the supply, storage and use of LPG?*

Please give your reasons.

For consultation: Each LPG supplier should be required to maintain a formal record relating to each site to which it supplies LPG

The Gill Report recommends that suppliers should keep records which:

‘...include the supplier’s current asset register, specifying the individual items of equipment of which the supplier contractually retains ownership; incorporating the provisions of the Installation Record as to the respective responsibilities of the supplier and the user; and noting the critical safety features, inspections records and risk assessments for all such equipment.’ (p 142)

Suppliers would be required to share these records with users:

‘The supplier should be obliged to provide the user with details of its asset register, critical safety features, examinations, inspections and risk assessments for its equipment on the user’s site.’ (p 142)

Questions in relation to supplier records

4 What are your views on the creation and maintenance of supplier records?

5 What are the practical implications of introducing such a record scheme?

Please give your reasons.

For consultation: Every LPG installation should have its own comprehensive installation record

A central element of the new regime is the proposal that all users of LPG should have an installation record. The installation record:

‘...would be a clear and complete source of data regarding the installation and its history to which all interested parties could refer. It would provide for a process of continuous assessment of the safety of any individual installation. Its existence would raise awareness of safety considerations on the part of users and suppliers. In short, it would help to promote a suitable safety culture.’ (p 135)

In addition it was recommended that:

‘...there should in every case be a named person having responsibility for custody of it.’ (p 136)

Questions in relation to the installation record for users

6 What are your views on the creation and maintenance of an installation record?

7 What are the practical implications of introducing an installation record?

Please give your reasons.

For consultation: A new scheme should be introduced that would require all LPG suppliers to be registered and accredited

The Gill Report states that:

‘...the importance of the safety considerations necessitates that there should be a registration scheme for all bulk suppliers of LPG; that registration should be in the form of accreditation based on the achievement of certain minimum standards and that registration should be a condition precedent to the supply of LPG to any user on any terms.’ (p 141)

Questions in relation to the registration and accreditation of suppliers

8 *What are your views on the creation and maintenance of a registration and accreditation scheme for suppliers of LPG?*

Please give your reasons.

For consultation: Every installation should be subject to mandatory periodic verification

The Gill Report recommends that:

‘...every installation should be subject to mandatory periodic verification by an ACP whose duty it would be to verify the integrity of the installation and to certify whether or not the installation itself, the safety regime applying on site and any mitigation measures in place at the site were satisfactory.’ (p 137)

Under such a scheme, a verification certificate could be granted or refused outright by the ACP. If refused, the installation could not be used until an ACP had visited it again to verify its integrity. In some cases, the certificate could be withheld pending the completion of any remedial work that the ACP might require.

Questions in relation to mandatory periodic verification

9 *What are your views on the introduction of mandatory periodic verification for every LPG installation?*

Please give your reasons.

For consultation: All buildings that have a bulk LPG supply should be inspected to identify if there are any hazardous features of the pipework layout or of the building structure itself

One of the contributory factors to the disaster was that alterations were made to the building and yard without any consideration of the potential impact on the safety of the installation. These combined to create an unventilated space where leaked LPG accumulated. It was here that the explosion occurred.

The Gill Report therefore recommended that:

‘...in conjunction with the survey of the underground pipework, the premises themselves should be inspected in order to identify any conditions that create the risk that leaking LPG may migrate and accumulate in unventilated spaces.’ (p 132)

As outlined above a pipework replacement programme is already underway but in addition the Gill Report proposes a requirement to inspect premises at the time of replacement.

A separate programme for inspection of the premises could be introduced, or the inspection of premises could form part of any verification scheme.

Currently, responsibility for the inspection and enforcement of the structural safety of buildings is as follows:

- Local authority building control departments have responsibility for all new buildings and for structural modifications to existing buildings including for changes in use.
- HSE and local authorities (LAs) work together to enforce health and safety in workplaces. HSE-enforced premises include factories, building sites, farms, quarries, chemical plant, schools, hospitals and other workplaces. LA-enforced premises include shops, some warehouses, most offices, hotels and catering, sports, leisure, consumer services and places of worship.
- In workplaces, matters of structural safety are also handled by the relevant enforcing authority for the Health and Safety at Work etc Act, taking into account the requirements of the Building Regulations.

These responsibilities apply regardless of the hazards involved.

The Gill Report states that there is a lack of clarity around who is responsible for structural safety. It therefore proposes that:

‘...the respective roles and responsibilities of these bodies in relation to LPG risks should be clearly identified in every case and should be set out expressly in the Installation Record.’ (p 144)

In addition, the Report states that:

‘HSE should publish more detailed guidance on the assessment of the structural safety of buildings into which LPG is supplied.’ (p 145)

Questions in relation to inspection of buildings

- 10** *What are your views on introducing inspections for all premises with underground metallic pipework for LPG to try and identify conditions that could lead to LPG building up in unventilated spaces?*
- 11** *If such inspections were introduced, should they be part of the verification scheme set out above, meaning that an approved competent person (ACP) would have to conduct an inspection as one of the conditions for awarding a certificate?*
- 12** *What are your views on the way the roles and responsibilities of HSE and local authorities specifically in relation to structural safety of buildings are differentiated? Is this clear enough?*
- 13** *Do you think that it would help to have the roles and responsibilities of these bodies in relation to LPG risks documented (for example, in an installation record)?*
- 14** *What are your views on HSE publishing more detailed guidance on the assessment of structural safety in buildings?*

Please give your reasons.

Annex 1

Summary of recommendations from the Gill Report

The following summary has been compiled by HSE for this consultation.
Text in square brackets is added by HSE.

Phase	Recommendation	Comments
Phase 1 – Urgent programme of pipework replacement and alterations to buildings	[There should be a systematic] programme of replacement of metallic pipework (p 131)	Being implemented through replacement programme
	[The] site owner [should be required] to adopt an inspection and maintenance strategy for buried metallic LPG pipework to monitor its condition pending replacement (p 132)	Being implemented through dutyholder awareness raising and as part of replacement programme
	[Any] pipework replacement programme should extend to the substitution of polyethylene for steel risers (p 132)	Being implemented through replacement programme
	Premises should be inspected in order to identify any conditions that create the risk that leaking LPG may migrate and accumulate in unventilated spaces (p 132)	Part of this consultation
	[New rules should] prohibit the use of pipework through an unventilated void in all new installations (p 133)	Part of this consultation – but could be addressed to modification of building regulations
	[New rules should] make mandatory the requirements in LPGA and IGEM guidance that at the entry point through an external wall LPG pipework should be sleeved and the sleeve sealed to the structure (p 134)	Part of this consultation
	[Work should be undertaken to] re-route all existing pipe entries above ground and fit with an ECV. (All pipework passing through unventilated spaces re-routed or ventilated) (p 134)	All existing pipe entries are being re-routed above ground, if required, where pipes are replaced as part of the replacement programme. Passage through unventilated spaces is part of this consultation

Phase	Recommendation	Comments
Phase 2 – Creating a new safety regime	Every LPG installation should have its own comprehensive installation record (p 135)	Part of this consultation
	Preparation, maintenance, and safe custody of the installation record should be the direct responsibility of the user with a named person responsible for custody (p136)	Part of this consultation
	A formal verification scheme [should be set up] with periodic assessment of every LPG installation by an approved competent person (ACP) (p 137)	Part of this consultation
	It should be unlawful for the user to use the installation or to obtain any further supply of LPG without a valid verification certificate (p 138)	Part of this consultation
	[There should be] mandatory provision in every supply contract that the supplier's liability extends up to first stage regulator (p 140)	Part of this consultation
	Ministers should consider whether the existing regulations on risk assessment could be made more effective, perhaps by addition of independent safety audit (p 141)	Part of this consultation
	A registration scheme [should be set up] for all bulk suppliers of LPG (p 141)	Part of this consultation
	It should be illegal to supply LPG to an installation which does not have a valid verification certificate (p 142)	Part of this consultation
	Each LPG supplier should be required to maintain a formal record relating to each site to which it supplies LPG (p 142)	Part of this consultation
Phase 3 – Continuing development of the safety regime	[There should be a] continuing programme of monitoring/research into the safety of polyethylene pipe (p 143)	Research on safety of polyethylene pipe already being undertaken for natural gas – access to this being obtained by HSE
	[There should be a] compulsory requirement on users to check the integrity of polyethylene pipework (p 143)	Requirement already exists under current regime

Phase	Recommendation	Comments
Phase 4 – Establishing effective communications and clarifying responsibilities	HSE should, in consultation with UKLPG, prepare practical advice for LPG users regarding the fulfilment of their statutory duties, particularly under DSEAR (p 143)	Work currently ongoing to prepare guidance
	[Every] supplier should be obliged to provide the user with details of its asset register, critical safety features, examinations, inspections and risk assessments for its equipment on the user's site (p 144)	Part of this consultation
	The respective roles and responsibilities of HSE and local authorities in the enforcement of the safety of buildings in relation to LPG risks should be clearly identified in every case and should be set out expressly in the installation record (p 144)	Part of this consultation
	HSE should publish more detailed guidance on the assessment of the structural safety of buildings into which LPG is supplied (p 145)	Part of this consultation

Annex 2

The pipework replacement programme

In June 2009, HSE and UKLPG agreed a high-level plan for replacement of underground metallic service pipework carrying LPG in England, Scotland and Wales. It covers the replacement of existing pipework carrying LPG in the vapour phase for both commercial/industrial and domestic installations.

According to an estimate of the number of installations with underground metallic service pipework, there are between 15 000 and 40 000 industrial/commercial installations and between 24 000 and 54 000 domestic installations of a similar kind.

Replacement work has already started, and once a survey to prioritise premises is finished (by October 2009), this work will accelerate.

Prioritising the highest risk

We aim to target first the highest risk underground metallic service pipework. This is likely to be pipework that is:

- oldest;
- in the least well-maintained condition;
- operating at medium pressure; or
- located in the most corrosive soils.

All pipework in industrial and commercial premises is planned to be replaced by the end of 2015, with the highest risk pipework being prioritised and replaced sooner.

We are working with UKLPG to ensure these target dates are met. For example, the industry is currently undertaking a survey that will help prioritise the replacement programme.

Actions to support the programme

Next steps will include a training programme to increase the number of qualified Gas Safe engineers available to carry out the replacement work. Discussions have already taken place with Gas Safe Register and the Safety Skills councils to put in place a fast-track training process.

HSE is preparing an additional inspection campaign in parallel with the pipework replacement, designed to secure agreement from LPG users to have their pipework replaced where required. The campaign will be carried out by inspectors from HSE and local authorities and will focus on sites prioritised as high risk. The inspections will cover the complete LPG installation, including the tank and any associated equipment, such as valves and regulators, as well as the pipework.

As part of this, we are producing guidance material for inspectors, training them in what they need to look for and planning the programme of site visits.

Updating user guidance

We are also planning to update the current user guidance material and will support UKLPG and the Institution of Gas Engineers and Managers in reviewing the supplier and installer codes of practice. As part of this, we will update the information leaflet *Checking LPG pipework: Industrial and commercial user responsibilities* for LPG users and provide a generic risk assessment for industrial/commercial companies to use to assess the operation of their LPG installation against current best practice. We also plan to provide technical guidance on the application of cathodic protection to existing metallic pipework installations.

Developing a strategy for domestic installations

We are currently reviewing the strategy for domestic installations, and are working closely with industry to agree a coordinated approach. Work is in hand to better understand the risks to domestic users, to consider possible sources of advice and support, and to assess the best approach to communicate with domestic users. Together, we aim to develop a plan of action and customer communication during the fourth quarter of 2009.

Reviewing progress

The overall pipework replacement plan will be reviewed in light of the data from the prioritisation survey, progress on engineer resource availability and the outcome of this consultation exercise on the Gill Report recommendations. This will ensure that replacement work continues to be targeted at the highest risk sites as new information becomes available.

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The full text of this and other
Consultative Documents can be viewed
and downloaded from the
Health and Safety Executive web site on the
internet: www.hse.gov.uk/consult/index.htm

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