

The Pressure Systems Safety Regulations 2000 (PSSR) Formal Response to The Call for Evidence (CfE)

1. Introduction

In October 2025, the Health and Safety Executive (HSE) launched a six-week Call for Evidence (CfE) on the Pressure Systems Safety Regulations 2000 (PSSR).

This formed part of the Government's wider Regulation Action Plan (RAP), which seeks to reduce unnecessary administrative burdens by 25%, while maintaining high standards of protection.

The purpose of the CfE was to gather evidence on:

- Whether aspects of PSSR create unnecessary administrative burdens
- Whether elements of the regulatory framework have become outdated in practice
- Opportunities to support growth innovation and economic growth without compromising safety outcomes.

This document summarises the evidence received and set outs HSE's response and next steps.

2. Overview & Responses Received

With thanks to all those that responded, HSE received 109 responses from a broad cross section of stakeholders, including; employees, contractors, advisers and representative bodies.

Headline findings were:

- 69% of respondents stated PSSR remains fit for purpose,
- 54% indicated that no systems or machinery should be removed from the regulatory framework (27% said systems or machinery should be removed but with no substantial suggestions that would remove unnecessary burden),
- 59% indicated the regulations were not duplicative and therefore not creating unnecessary burdens,
- 64% of respondents advised the PSSR Approved Code of Practice (ACoP) remained fit for purpose.

While a range of detailed points were raised, the overall evidence base does not demonstrate a clear or proportionate case for legislative reform at this stage when taking into consideration the cost any regulatory change would place on business.

3. Key themes raised during the CFE and response

This section summarises the principal themes. Detailed individual points cannot all be reproduced here; however, all evidence was reviewed and thematically analysed.

Overall, most respondents consider the regulation fit for purpose, with improvements best delivered through clearer guidance and ACoP updates rather than legislative change

3.1. Guidance, Scope and Examination Regime

A consistent theme was that many practical challenges arise from guidance and application rather than from limitations within the regulation.

Respondents raised concerns regarding:

- Definitions and classifications (e.g. installation and relevant fluid)
- Interactions with other regimes specifically Pressure Equipment Safety Regulations 2016 (PESR) and Provision and Use of Work Equipment Regulations 1998 (PUWER)
- Being clearer on who has responsibilities in lease or hire arrangements
- Being clearer on the distinction between pipeline and pipework
- Examination intervals being unclear, leading to unnecessary duplication of testing; updated guidance can address this by showing how intervals can be aligned with existing maintenance activities.

Respondents supported that PSSR already works as a goalsetting framework. The requirement to have a Written Scheme of Examination (WSE) allows the Competent Person to set suitable, risk-based examination intervals. Most issues raised in the CfE related to differences in how the rules are interpreted and applied in practice, rather than to limits in the legislation itself. There were some calls for the intervals to be reduced although no evidence was provided to demonstrate the specific safety concern.

3.1.A. PESR

Some respondents highlighted uncertainty around key definitions and their consistent application, particularly in relation to “installation”, “assembly” and “relevant fluid”. One issue raised was uncertainty over how these definitions determine which sets of regulations apply PESR or PSSR. The requirement of the regulations means that, bar for some limited exceptions, any activity resulting in the creation of pressure equipment constitutes a manufacturing process. In such cases, the full requirements of PESR apply, including the conformity assessment and associated documentation. Where certified pressure equipment is assembled on site by a user for internal use, the system must instead be managed under PSSR, including the establishment and maintenance of a Written Scheme of Examination (WSE). This distinction should be applied consistently. Industry guidance is already available on this, but HSE will look to further clarify this in guidance when the opportunity arises,

3.1.B. Mobile Equipment and Installed Systems

Feedback from respondents pointed to a need for clearer guidance on distinguishing between mobile and installed pressure systems, particularly where equipment is leased or hired. Under PSSR, an installed system is any pressure system that is not a mobile system, while a mobile system is one that can be readily moved and used in different locations.

As an example based on evidence received, a hired coffee machine containing a steam generating pressure vessel, once plumbed into a building’s water supply and used in a fixed location, should be treated as an installed system. In such circumstances, the coffee shop owner of the installed system would normally be the dutyholder responsible for compliance with PSSR, unless responsibility has been formally transferred in writing to the supplier of the coffee machine (for example, within a lease or hire contract).

PUWER continues to apply to the safe use, transport, installation and maintenance of the equipment regardless of who the PSSR dutyholder is. HSE will consider opportunities,

where appropriate, to support understanding of how responsibilities could be interpreted in lease or hire arrangements.

3.1.C. Pipeline and Pipework

Respondents felt that the distinction between workplace pipework and pipelines transporting substances over distance needed further clarification, particularly regarding which regulatory framework applies to each.

In simple terms, a pipeline is a system designed to transport substances across boundaries between locations, whereas pipework refers to the piping installed within a workplace as part of a plant or pressure system.

A pipeline used solely to transport substances between sites is not subject to PSSR and is instead regulated under dedicated pipeline legislation.

However, once a relevant fluid is being conveyed under pressure within workplace premises, this constitutes pipework as referred to in PSSR. This pipework forms part of a pressure system once installed and used under pressure, and is therefore subject to PSSR, and remains subject to PUWER at all times.

3.2. Competency and benchmarks

Competence was a central theme linking inconsistent examination intervals, variable assessment quality and duplicative testing. Evidence suggests these issues arise from variability in the interpretation of “competent person” rather than from regulatory limitations.

HSE will continue to keep this under review and as opportunities arise, clarify what competency expectations are via relevant channels for example guidance or industry partners.

3.3. Enabling Net Zero growth (Hydrogen, carbon capture, exemptions and exceptions)

Respondents expressed strong interest in how PSSR interfaces with emerging Net-Zero technologies, including hydrogen applications and evolving pressure-based systems, calling for more regulation or research to assess the perceived changing risk profile of some pressure systems.

Hydrogen systems are already included within PSSR, as at 0.5 bar and above, hydrogen is classed as a ‘relevant fluid’ under the Regulations. PSSR is a goal-setting framework, requiring duty holders to demonstrate that danger associated with a compressed fluid is being effectively controlled through measures such as establishing safe operating limits, maintaining equipment, and implementing a WSE. As part of this approach, risk assessments should take account of the known hazards associated with hydrogen (such as fire and explosion) and be fully integrated into the organisation’s wider management system.

The CfE did not supply sufficiently robust scientific evidence to justify legislative revision to the current list of exemptions at this time. HSE will continue to monitor developments to ensure safety while avoiding premature regulatory expansion.

3.4. 28-day reporting (Regulation 9)

HSE acknowledge comments from some respondents noting practical challenges when applying the 28-day timeframe to larger or more complex systems. While these perspectives are understood, the workarounds referenced in submissions were not accompanied by sufficient technical detail to demonstrate that an alternative approach would maintain equivalent levels of protection or that a statutory change is warranted.

Regulation 9 forms a core safeguard within PSSR, ensuring that examinations specified under the WSE are carried out properly and within the required intervals to prevent danger from pressure system failure. This requirement is in place to uphold the fundamental purpose of PSSR, protecting people from the risks associated with stored energy in pressure systems.

PSSR requires the next inspection date to be set within 28 days of the completion of the final examination in that series, even though a Risk Based Inspection (RBI) review may later support a change in the scope or interval. Regulation 9(7) also provides limited flexibility through a one-time postponement by agreement, and without penalty. HSE recognise some respondents found this structure more challenging for complex plants as they can include multiple vessels, extensive pipework and the findings from numerous items needing to be consolidated into one single report. However, no evidence was submitted to support altering the current requirement. The evidence provided did not demonstrate that regulatory modification would improve safety performance, nor that maintaining the existing reporting timeframe adversely impacts safety outcomes.

Therefore, HSE will not pursue any amendment to Regulation 9 at this stage, but the matter will remain under review.

4. Next Steps

In line with the government's growth agenda and the commitment to reduce unnecessary administrative burdens, HSE has carefully considered whether legislative change can be made at this time.

The CfE did not produce sufficient evidence to demonstrate that legislative reform would:

- Reduce burden without undermining safety outcomes
- Deliver benefits that outweigh the disruption and transitional costs

HSE will continue to monitor the evidence base as it develops but legislative reform opportunities which support the aims of the RAP, have not been identified at this time. Instead, HSE will seek to improve understanding and support business with compliance through updated guidance as opportunities arise.

HSE will continue structured engagement with industry, trade associations and technical bodies, through existing workstreams prioritising areas with the greatest risk and the greatest potential to reduce unnecessary administrative burden through clearer guidance.

Monitoring will continue to ensure the regulatory approach remains proportionate, evidence-led and responsive to emerging technologies and operational practice.