

IEMA Lead Environmental Auditor

Introduction

This Supplement contains updates to your study material for the IEMA Lead Environmental Auditor course. Please read it carefully.

Element 1: Environmental Issues

Environmental Issues

BIODIVERSITY

Water

In the last paragraph under this subheading, “**Control of Major Accident Hazards Regulations 1999 (COMAH)**” has been updated to “**Control of Major Accident Hazards Regulations 2015 (COMAH)**”.

Environmental Communications and Reporting

In the second paragraph under this subheading, the last bullet point has been amended to read:

- “Legal requirements - such as under the **Control of Major Accident Hazards Regulations 2015 (COMAH)**.”

Element 4: Analysis and Validation of Objectives, Targets, Management and Monitoring Regimes

Sector-Specific Processes and Practices

Management And Prevention Of Abnormal And Emergency Situations

Emergency Response Plan

The first paragraph under this subheading has been amended to read:

“Some organisations, such as large chemical works, must prepare emergency response plans which also take account of environmental concerns. These regulations are known as the **Control of Major Accident Hazards (COMAH) Regulations 2015** and apply to all organisations that store chemicals above certain threshold limits. Two emergency plans are required:

- The on-site emergency plan, which is prepared by the site operator, to specify the response to the emergency of those who work on the site.
- The off-site emergency plan, which is prepared by the local authority, to specify the co-ordinated response of agencies to an emergency on the site which has off-site effects.”

Element 6: Environmental Legal and Other Requirements

Background to Law

Hazardous Substances

The COMAH Regulations

This subsection has been replaced by the following revised subsection:

“The COMAH Regulations

The **Control of Major Accident Hazards Regulations 2015 (COMAH)** bring into force the requirements of **EU Directive 12/18/EU on the control of major-accident hazards involving dangerous substances**, amending and subsequently repealing **Council Directive 96/82/EC**.

These Regulations are aimed at controlling major accidents, which are defined as:

*‘an occurrence such as a major emission, fire or explosion resulting from **uncontrolled developments** in the course of the operation of any establishment to which these Regulations apply, leading to **serious danger** to human health or the environment (whether immediate or delayed), inside or outside the establishment, and involving one or more **dangerous substances**.’*

Determining whether an accident is major depends on the event type, the event scale, the size and location of the affected area, the evaluation of event progression, and the potential harm to the population and the environment.

A further definition of major accident is **Major Accident To The Environment (MATTE)** which, as the name suggests, takes into account major damage to the environment. These can be caused by numerous types of accidents such as spills, explosions or fires affecting Sites of Special Scientific Interest (SSSIs) or other designated sites, soils, or serious water pollution.

The Regulations apply to organisations that store certain dangerous substances above the thresholds stated in the Regulations. Substances covered include those that are flammable, explosive, toxic or dangerous to the environment. Two sets of thresholds are known as low-risk or ‘lower-tier’ and high-risk or ‘upper-tier’, based on quantities of substances stored.

The general theme of **COMAH** is:

- Operators of **COMAH** sites must take all measures necessary to prevent or mitigate the effects of major accidents to people and to the environment.
- **COMAH** sites must develop a **Major Accident Prevention Policy (MAPP)**.
- Details of the **types and quantities of hazardous substances** must be sent to the competent authority.
- ‘Upper-tier’ sites must send a **Site Safety Report** to the competent authority for approval. This has the function of identifying major accident hazards on the site and provides an estimation of the likely risks associated with the site and potential for major accidents which could affect the environment. Where such risks are identified, an assessment must be undertaken to establish the consequences of the event in terms of the environment.
- The Regulations are jointly enforced by the HSE and the EA/SEPA as ‘**the competent authority**’. The EA/SEPA is concerned principally with the assessment of the environmental aspects of **COMAH**.”