

Guidance on the notification and reporting of  
dangerous occurrences involving spillages of  
dangerous substances under the *Reporting of  
Injuries, Diseases and Dangerous Occurrences  
Regulations 2013* (RIDDOR)

2nd edition

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## FOREWORD

This publication provides guidance to operators of road tanker loading facilities (e.g. bulk storage installations including terminals, depots, etc.), operators of road tanker unloading facilities (e.g. depots, filling stations, airport tank farms, agricultural premises, etc.), and road tanker fleet operators on the reporting of dangerous occurrences involving releases of flammable fuels during road tanker loading and unloading in Great Britain (GB) under the *Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013* (RIDDOR). The publication identifies who should report such dangerous occurrences and sets out factors under which dangerous occurrences should be reported when quantities released fall below the RIDDOR flammable fuel quantity reporting thresholds.

Flammable fuels are regularly loaded and unloaded in the fuel supply chain. Whilst there are numerous systems (engineering, management, procedural, etc.) in place to reduce the risk of release of flammable fuels, sometimes releases occur. In the event of a release, RIDDOR require the responsible person to report incidents meeting defined criteria to the relevant enforcing authority (in GB, the Health and Safety Executive (HSE)), to assist HSE to develop strategies to avoid future incidents and help prevent fatalities, injuries and incapacitation of people, and accidental loss.

*El Guidance on reporting of dangerous occurrences involving releases of flammable fuels during road tanker loading and unloading under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR)*, (2<sup>nd</sup> ed.) usurps the 1<sup>st</sup> edition (*El Recommendations for notification and reporting of dangerous occurrences involving spillages of dangerous substances in the downstream petroleum industry under RIDDOR 95*). The key change is to align the guidance with RIDDOR 2013. In doing so, it now excludes reporting of incidents occurring during road transport by road tanker as this is no longer required by RIDDOR as such incidents are subject to UNECE ADR (see its Annex A, Part 1, clause 1.8.5).

The information contained in this publication is for guidance only, and while every reasonable care has been taken to ensure the accuracy of its contents, the EI, and its technical committees, cannot accept any responsibility for any actions taken, or not taken, on the basis of this information. The EI shall not be liable to any person for any loss or damage that may arise from the use of any of the information contained in any of its publications.

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David Athersmith	Consultant
Russell Best (Chairperson)	P66 Ltd.
Tony Brown	Federation of Petroleum Suppliers
Colin Fenwick	Wincanton
Vickie Knight	Shell U.K. Oil Products Limited
Neil Leyshon	BP Oil UK Ltd.
Toni Needham (Secretary)	Energy Institute
Ken Palmer	Consultant
Barrie Salmon	Tank Storage Association
Dr Mark Scanlon	Energy Institute
Stuart Walker	ExxonMobil
John Wormald	Total UK Ltd.

Affiliations refer to the time of participation.

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Technical editing and project coordination was initially carried out by Andrew Sykes and latterly carried out by Dr Mark Scanlon (EI).

# **1 INTRODUCTION, PURPOSE, SCOPE AND APPLICATION**

## **1.1 INTRODUCTION**

The *Reporting of Injuries, Diseases and Dangerous Occurrences Regulations* 2013 (RIDDOR), require a responsible person to report prescribed incidents to the relevant enforcing authority (in GB, the Health and Safety Executive (HSE)). These regulations are supported by guidance (HSE *RIDDOR*), which provides advice on meeting the requirements of RIDDOR. RIDDOR are made under the Health and Safety at Work etc. Act 1974 and apply reporting requirements to all GB work activities.

This publication builds on the regulations and guidance listed here by providing guidance to the flammable fuels distribution sector on the reporting of dangerous occurrences involving releases of flammable fuels during road tanker loading and unloading.

## **1.2 PURPOSE**

The main purpose of reporting under RIDDOR is to generate reports to the HSE to alert it of individual incidents. RIDDOR reports also provide data which are used to indicate where and how risks arise and to identify industry trends in reportable injuries, diseases and dangerous occurrences. This enables the HSE to target its activities effectively and to advise employers on strategies to help prevent fatalities, injuries, incapacitation, ill health and accidental loss, through shared learning.

Dangerous occurrence reporting is designed to obtain information primarily about incidents which have a high potential to cause reportable injuries (even though they do not actually cause such injuries), but which happen relatively infrequently. Collecting the information gives the HSE the opportunity to learn about the circumstances in which incidents occur and about their causes. This widens the pool of information which can be used to help business in accident prevention work.

This publication aims to clarify the requirements for reporting of dangerous occurrences involving releases of flammable fuels during road tanker loading and unloading, including a consideration of the potential to cause reportable injuries or harm to people. The publication also identifies who should report such dangerous occurrences (the 'responsible person') depending on the incident location.

## **1.3 SCOPE**

This publication provides guidance to the flammable fuels distribution sector on the reporting of dangerous occurrences involving releases of flammable fuels during road tanker loading and unloading (specifically, RIDDOR Schedule 2, Part 2, paragraph 26 (replicated in Annex A)). It does not address the requirements to report reportable injuries, diseases or other types of dangerous occurrences covered by RIDDOR, nor does it cover reporting requirements for releases of flammable fuels at bulk storage installations subject to the *Control of Major Accidents Hazards (COMAH) Regulations*, or during the carriage of dangerous goods, which have been removed from RIDDOR and are subject to UNECE ADR Annex A, Part 1, clause 1.8.5.

The scope of work excludes emergency preparedness and response to incidents, whether at road tanker loading or unloading locations, or any other locations (e.g. during road transport).

This publication does not cover modes of transport of flammable fuels other than by road tanker.

The scope of flammable fuels includes those liquids and gases, whether they are used as fuels or otherwise, that meet the 'flammable liquid or gas' definition in HSE *RIDDOR* (see Annex A): practically, this would include refined petroleum products and biofuels and their blends, such as compressed natural gas (CNG), denatured ethanol, kerosene, liquefied petroleum gas (LPG), methanol and petrol (gasoline).

#### **1.4 APPLICATION**

This publication provides guidance to operators of road tanker loading facilities (e.g. bulk storage installations including terminals, depots, etc.), operators of road tanker unloading facilities (e.g. depots, filling stations, airport tank farms, agricultural premises, etc.), and road tanker fleet operators. It is based on RIDDOR, which apply in GB; a similar rationale could be applied in Northern Ireland, which has similar regulations.