



**Chemical Business Association**

# **SMS – CAN ONE SIZE FIT ALL?**

# WHY ARE WE HERE?

## SMS WORKSHOP

- Open dialogue
  - Share experiences
    - Inspectors
    - Industry
  - Learn lessons
    - Good; and
    - Bad...
  - Better understand issues
    - On both sides



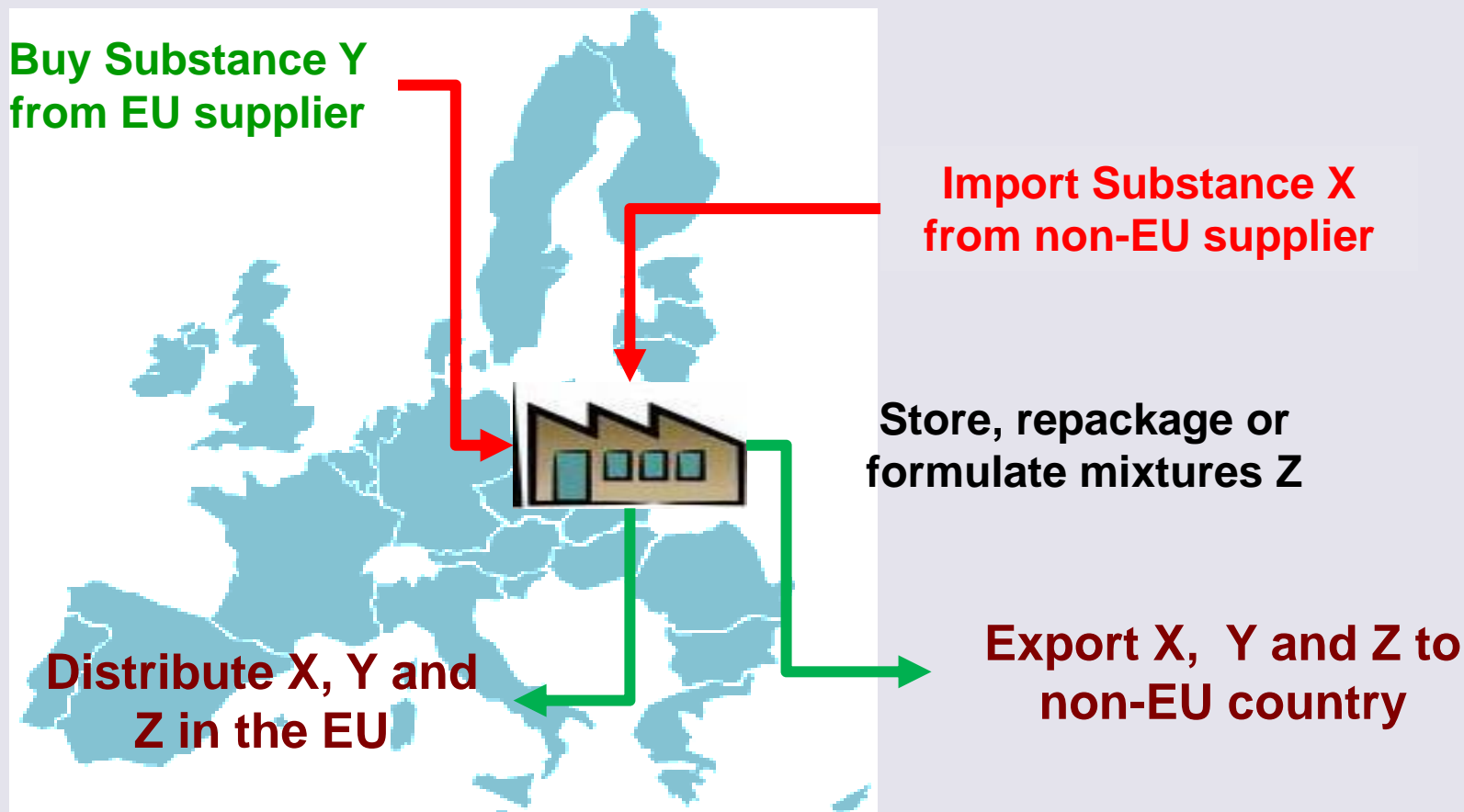
# WHY AM I HERE?

## INDUSTRY POINT OF VIEW

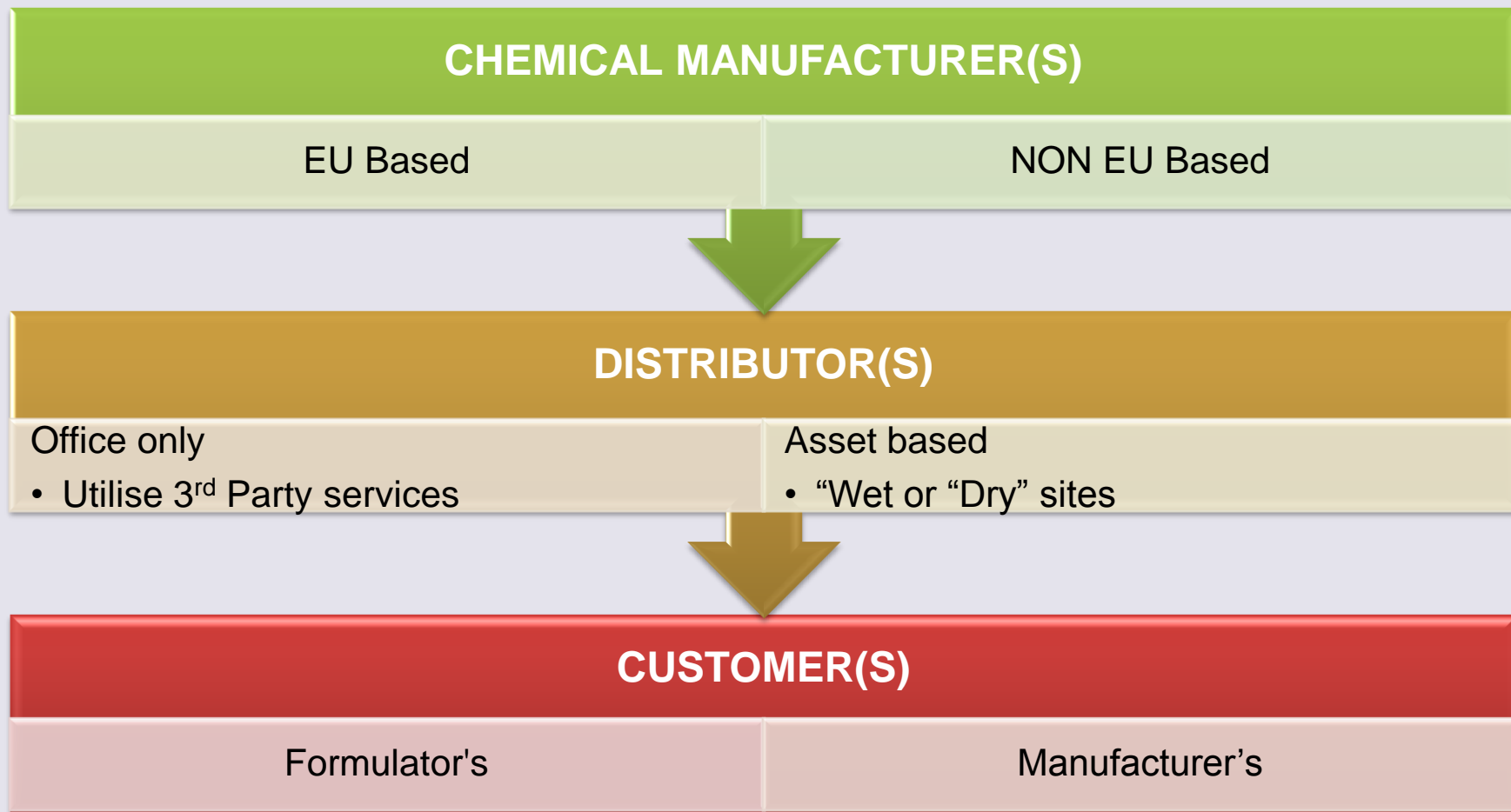
- Chemical Distributors
  - EU over 1,700 companies
- European annual sales of around €26 billion
- Employs over 30,000 people
  - Supplies to over 22 Million tonnes of chemicals
    - to over 1 million Downstream Users



# DISTRIBUTORS ROLE



# CHEMICAL DISTRIBUTORS



# CBA MEMBERSHIP

Distributor = 34

- Upper Tier = 11
- Lower Tier = 23

LSP = 39

- Upper Tier = 23
- Lower Tier = 16

Micro  
• 13%

Small  
• 37%

Medium  
• 35%

Non-SME  
• 15%

# SAFETY MANAGEMENT SYSTEMS

DOES ONE SIZE FIT ALL?

**Can an organisation  
operate a single  
safety management  
system across  
multiple sites within  
multiple territories?**



# SAFETY MANAGEMENT SYSTEMS



NOT AS SIMPLE AS IT LOOKS...

Legislative variations

Differing enforcement regimes

Different legal processes

Federalism

Social/cultural factors



# SAFETY MANAGEMENT SYSTEMS

THRESHOLDS MAY BE UNIFORM

- Seveso III
  - Annex I

BUT...

- Companies are not
  - Operations vary
  - Structural format
  - Needs of business differ



# TYPES OF DISTRIBUTORS

## ASSET BASED DISTRIBUTORS



### “Wet” site

- Bulk storage
- Dilution
- Repacking
- Formulation/Blending

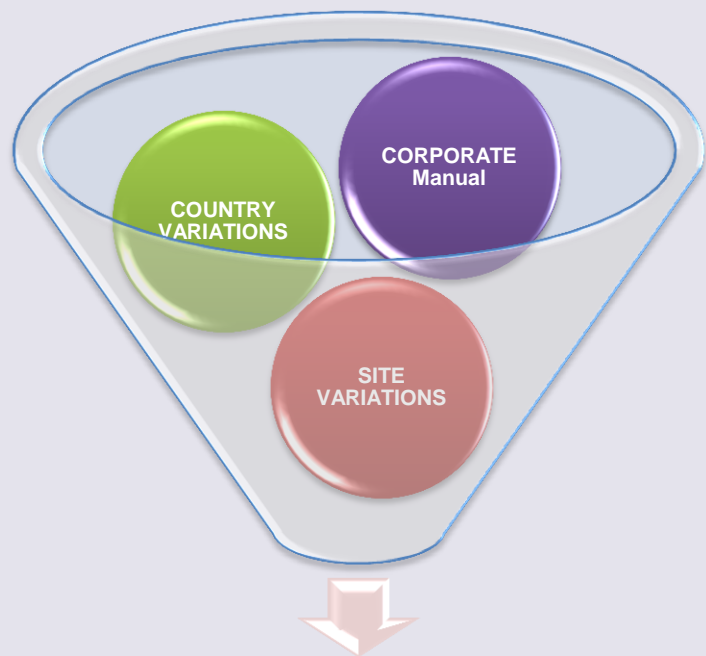


### “Dry” site

- Storage of packaged goods

# SPANNING THE GAP...

## HYBRID APPROACH



**SITE SPECIFIC SMS**



# SAFETY MANAGEMENT SYSTEMS



- Corporate Manual
  - High level strategy
    - Applies a 'common set of standards' across the organisation
      - Such as accident reporting, contractor management...
    - Uses broad terminology
      - Suitable arrangements in place
      - Permit to Work systems

# SAFETY MANAGEMENT SYSTEMS



- Country variations
  - ‘fleshes out’ the corporate manual
    - Permits to work
    - Contractor selection criteria
  - Specific terminology
    - COMAH in UK
    - DSEAR in UK

# SAFETY MANAGEMENT SYSTEMS



- Site variations
  - Operation of specific equipment
    - Such as Penstock valves
  - Site details
    - Incident controller
    - Main Site Controller

# SUMMARY

## MULTISITE WITHIN SAME TERRITORY

- Site variations likely to result in different SMS
  - Sites may look similar but they are never “identical”



# SUMMARY



## MULTISITE WITHIN ACROSS TERRITORIES

- Will not be able to standardise SMS content
  - Variations too prominent
    - Basic core similar





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**ANY QUESTIONS**

