Legislative Requirements

• Seveso 3 Directive transposed into National Regulations
• SI No. 209 of 2015
• Reg.10 – Major Accident Prevention Policy
• Paragraph vi – Monitoring performance- adoption and implementation of procedures for the ongoing assessment of compliance with the objectives set by the operator’s MAPP and safety management system, ........... The procedures shall also include performance indicators such as safety performance indicators (SPIs) and/or other relevant indicators;
SPI’s as part of Inspection Programme

• Prior to 2015 regs.

• Assessment Proforma –

  Assessment of Safety Management System in Relation to Key Risk Control Systems – Process Safety Performance Indicators

• Completed in all Seveso establishments

• Series of questions
  - Policy
  - Planning and Implementing
  - Organising
  - Measuring Performance
  - Audit & Review
Quick example of Proforma

<table>
<thead>
<tr>
<th>Policy</th>
<th>Supporting Evidence</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Does the organisation have a policy document relating to Process Safety Performance Indicators (PSPIs)?</td>
<td></td>
</tr>
<tr>
<td>1. Does the policy refer to the key risk control systems (RCSs) for prevention of major accidents?</td>
<td></td>
</tr>
<tr>
<td>1. Is the purpose of the PSPIs clearly stated?</td>
<td></td>
</tr>
<tr>
<td>1. Does the policy aim to link process safety performance with the remuneration/reward of senior managers?</td>
<td></td>
</tr>
<tr>
<td>1. Does the policy deal specifically with major hazard process safety?</td>
<td></td>
</tr>
<tr>
<td>1. Is the business case for PSPI stated?</td>
<td></td>
</tr>
</tbody>
</table>
SPI’s as part of Inspection Programme

- Since 2015 Regs.

- Carry out a **Layer of Protection Risk Assessment (LOPA)** on an Identified major accident scenario

- Assess key barriers using **checklists**
- Questions on spi’s included in all checklists
Quick example of Checklist

Are there kpi's assigned to the Safety Critical Inspection regime?

Is non-adherence to the schedule reported to senior management?
The Good and the Bad

• Lots of companies NO POLICY in relation to spi’s
• Over – Focus on lagging indicators
• No involvement of employees on selection of spi’s
• Not based on Major Accident Hazards for the establishment
• Corporate Selection of spi’s

• Use of Bow Tie Analysis to Select spi’s
• Use of LOPA assessment to select spi’s
• Ratio of 65% to 35% leading Vs lagging indicators
• Bench mark against competitors
• Regular review of spi’s chosen
Thank you