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E-Bulletin: Fire Prevention Plans Update 2



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Business Impact Target Assessment

We recently carried out a survey inviting operators to submit the costs involved in implementing the requirements of the FPP guidance. Many thanks again to those who responded. The information provided is to be used to assess the costs and/or benefits of the changes we are proposing to make to the guidance. It is now a requirement for regulators to carry out economic impact assessment of any changes such as the FPP guidance.

We have now met with the Defra economists who are assisting us with this assessment, and they have provided us with a timetable for when it will be completed. Due to the complexities and range of variables involved, we will have to deliver this by a phased approach. We have been advised that it may take approximately 3 months to complete; longer than originally anticipated. We intend to publish the FPP guidance after scoping the first stage of this qualitative assessment.

We have discussed this with the Regulatory Policy Committee (which will be scrutinising the analysis), and it was agreed that the approach we are taking with this is the right one and will ensure we produce a robust and accurate assessment. We will keep you updated on this as it progresses.

FPP Assessment

Since July 2015 we have received a total of 237 FPPs. So far 82 (35%) of these plans have been accepted and 155 (65%) have been rejected. The quality of plans is improving and the acceptance rate has increased from its initial level of less than 10%.



Fire at Appspound Lane, St Albans, Hertfordshire

Getting it Right

We spoke to the Director of a consultancy who has had a number of their Fire Prevention Plans approved on first time of submission. We asked them for their top tips for getting your plan approved:

- Understanding that the officer reviewing the plan may not have been to site, so presenting the plan in a logical order can really help. Following the order of the guidance makes it clearer and easier to find important information.
- Work your way through the guidance and make sure your plan answers any questions in the guidance
- Make use of any records or certificates you may already have on site, such as maintenance schedules and electronics certificates
- Make sure that you understand the fire risks your site poses and that you have the right measures in place to reduce those risks. For some sites this might be a £30 hose pipe for others it might mean changes to infrastructure or different equipment like a thermal camera to detect surface fires.
- Site plans - you need to have every point covered on the site plan guidance, otherwise it will be rejected, regardless of how insignificant it might seem for an individual site. For example, minor points like adding where the hydrants are outside the site - or alternatively adding into the site plan information key that there are no hydrants outside the site.

Complying with your FPP

Waste teams in Greater Manchester Merseyside and Cheshire (GMMC) have started auditing sites to assess compliance with approved FPPs. Other areas across the country will begin to do the same.

We spoke with Karen Henson an Environment Officer in GMMC who has been undertaking these audits with her colleague Claire Hayter, to get an idea of what you can expect when compliance is checked at your site. Karen highlighted some of the main areas when assessing compliance with an FPP:

- Paperwork & Records – Maintenance schedules, Daily Fire checks, Staff Training, transfer notes, stock rotation, location and site plans
- Procedures - Waste Treatment, Waste acceptance, ignition sources, dust management, integrity of infrastructure.
- Prevention- Pile sizes and distances checked and measured, detection systems, fire walls, suppression system, site security
- Emergency Response - Containment, disposal of waste, fire fighting equipment, water supply,

A compliance assessment may not be limited to these areas but it gives a good indication of what an assessment may comprise of.

Karen also added that:

"It is important that you are implementing what is written in the FPP to manage fire risk at your site. If circumstances or procedures have changed on site then you should ensure that your FPP is updated to reflect this and resubmitted to the Environment Agency."



Recent audit at Blakeleys Recycling Ltd

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