



اوتوريٽي ڪي بيغسان ڪسلا مٿن
ڪصبيٽن دان عالم سڪيٽر
Safety, Health and Environment
National Authority

WORKPLACE SAFETY AND HEALTH NOTICE (WSHN)

TOPIC LOSS OF PRIMARY CONTAINMENT AT A CONTROL OF MAJOR ACCIDENT HAZARDS (COMAH) FIXED FACILITY LEADING TO PERSONNEL INJURY				Reference Number 2026/WSHN/02
Approved by: Director of Regulatory Division	Endorsed by: Chief Executive Officer	Issue date: 21 July 2026	Expiry date: None	Revision No: 1.0

The Safety, Health and Environment National Authority (**SHENA**) reminds all Duty Holders of the importance of full compliance with the requirements of the Workplace Safety and Health (Facilities) (Control of Major Accident Hazards) (**COMAH**) Regulations to ensure safe operations at their facilities.

Incident Summary: Earlier this year, an incident occurred at a COMAH fixed facility during maintenance activities involving a blocked process filter. Following isolation and purging activities, residual high-temperature slurry and coke powder were unexpectedly released during line-breaking operations. The incident resulted in burn injuries to one worker, while a second worker sustained an ankle fracture while taking evasive action.

The investigation found that residual process material remained trapped within the system despite the purging activities carried out. During maintenance work, the trapped high-temperature slurry and coke powder were released, resulting in a loss of primary containment and exposing personnel to hazardous process materials.

Key Lessons Learnt: This incident demonstrates that pressure indication alone does not necessarily confirm that process equipment has been rendered safe for maintenance activities. Residual pressure trapped process material, and incomplete isolation may continue to present significant hazards even after depressurisation and purging activities have been completed.

This incident further reinforces the importance of systematically identifying and controlling hazards associated with maintenance activities involving line-breaking or containment-breaking operations. Duty Holders should ensure that adequate and comprehensive risk assessments, isolation measures, permit-to-work controls, and appropriate supervision are implemented before commencing such activities.

All COMAH facilities are reminded to **establish, implement, and strictly adhere to Standard Operating Procedures (SOPs) and Permit-to-Work Systems to ensure the safe execution of maintenance and production activities.**

Required Actions: Sufficient measures shall be implemented in accordance with the hierarchy of controls to reduce residual risks to As Low As Reasonably Practicable (ALARP). These measures include, but are not limited to, the following:

- a. **Verifying isolation and removal of residual energy**
Ensuring process systems are adequately and effectively isolated, depressurised, drained, purged, and independently verified prior to commencement of line-breaking activities.
- b. **Strict adherence to approved operating and maintenance procedures**
Ensuring all procedural requirements, including purging durations, isolation requirements, verification steps, and acceptance criteria, are fully complied with, and that any deviations are appropriately authorised, risk assessed, and documented.
- c. **Conducting effective Job Hazard Analysis (JHA)**
Identifying potential release scenarios, residual pressure hazards, line-of-fire exposure, and emergency escape requirements before commencing work.
- d. **Providing suitable personal protective equipment (PPE)**
Ensuring personnel exposed to high-temperature process materials are equipped with suitable heat-resistant and anti-scalding PPE commensurate with the hazards identified.
- e. **Managing worker positioning and line-of-fire exposure**
Ensuring personnel are positioned away from potential release paths and provided with unobstructed emergency escape routes during line-breaking and maintenance activities.
- f. **Strengthening supervision and permit-to-work controls**
Ensuring competent supervision is maintained throughout the work activity and that permit conditions are effectively implemented and verified in the field.
- g. **Ensuring competent and well-trained personnel**
Ensuring personnel involved in isolation, permit issuance, and line-breaking activities are adequately trained, assessed as competent, and familiar with the specific process hazards and emergency response requirements.
- h. **Strengthening Emergency Preparedness and Response Arrangements**
Ensuring emergency response equipment, communication systems, eyewash stations, safety showers, and first-aid arrangements are readily available and verified as operational before commencing work.

i. **Establishing exclusion zones and restricting access**

Establishing suitable exclusion zones and restricting access to non-essential personnel during line-breaking activities to minimise potential exposure in the event of an unexpected release.

j. **Suitability and integrity of equipment**

Ensuring tools, temporary containment devices, blinds, gaskets and other equipment used during line-breaking activities are suitable for the service conditions and inspected prior to use.

All Duty Holders are reminded of their obligations under Regulation 20 of the WSH (COMAH) Regulations to ensure that all operations and activities are conducted in accordance with the procedures, measures, and arrangements described in their approved Safety Case, including the maintenance of effective isolation, permit-to-work, and process safety management systems.

For further clarification, please submit inquiries via “General Enquiries” on the SHENA website (www.shena.gov.bn), or contact the SHENA office at + **673 238 2000** during office hours.

END