

**CONSULTATION ON THE CONTROL OF
POLLUTION (OIL STORAGE) REGULATIONS
(NORTHERN IRELAND) 2010**

SYNOPSIS OF RESPONSES

September 2010

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1. Introduction

On 26 March 2010 the Department of the Environment published a consultation paper on proposals to introduce the Control of Pollution (Oil Storage) Regulations (Northern Ireland) 2010 to control above ground oil storage facilities in Northern Ireland. The full text of the consultation paper is available on the Department's website at: www.doeni.gov.uk

The objective of the proposed Regulations is to reduce and prevent the number of oil-related water pollution incidents in Northern Ireland. They will do this by complementing and enhancing existing water pollution controls and by setting minimum design standards for new and existing above ground oil storage facilities, providing a legal requirement for the standards to be met.

In addition, the proposed Regulations will contribute to the implementation of the Water Framework Directive (2000/60/EC) which requires that for diffuse sources liable to cause pollution measures are put in place to prevent or control the input of pollutants.

2. Consultation

The consultation paper set out the proposed approach to the storage of oil above ground and posed questions designed to elicit views on this approach.

In particular it was proposed in the consultation that Regulations would apply to anybody who has custody or control of above ground oil storage facilities with a storage capacity of more than 200 litres, on industrial, commercial and institutional/residential (e.g. schools, day care centres, hospitals, nursing homes) premises. It was also proposed that the Regulations would apply to waste oil storage facilities and to companies who refine or distribute oil.

In addition, the proposed Regulations make provision for transitional cases, coming into operation in three stages;

- new storage facilities will have to comply within six months of the Regulations coming into operation;
- existing storage facilities, which are located within 10 metres of a waterway or 50 metres of a well, spring or borehole, will have to comply within two years of the Regulations coming into operation; and
- remaining existing storage facilities will have to comply within four years of the Regulations coming into operation.

The consultation period ran from 26 March 2010 to the 17 June 2010. Late responses were accepted up to 28 June 2010.

3. Publication and Distribution

The Department invited responses from a range of organisations and individuals including MPs, MLAs, local councils, health trusts, academic and professional institutions, farming and business organisations. The consultation paper was also published on the Department's website and publicised through press notices.

4. Engagement with Stakeholders

On the 14 and 15 June 2010 the Department, in association with ARENA Network (the environmental arm of Business in the Community) held seminars, in Belfast and Dungannon respectively.

The purpose of the seminars was to:

- i. advise businesses on the purpose and aims of the proposed regulations;
- ii. advise on the legal obligations;

- iii. explain who the legislation will impact on and who is exempt;
- iv. explain the transitional periods for compliance; and
- v. advise businesses regarding enforcement and the right of appeal.

Guest speakers from the Department's Planning and Natural Resources Division, Northern Ireland Environment Agency (NIEA), NetRegs and the manager of the Oil Firing Technical Association (OFTEC) provided advice on the proposed Regulations and Best Practice Guidance.

The seminars were fully booked up to the capacity of 48 at each location and attended by a range of stakeholders from the oil industry, the business community, health trusts, councils and environmental groups.

Following the presentations, oral questions were taken by the speakers. Delegates were also encouraged to raise issues with the speakers during the networking lunch.

A questionnaire containing the six questions posed in the consultation paper was included in delegate's information packs and they were asked to complete this if they had any comments to make. A number of delegates requested an extension to the consultation period in order to properly respond to the questions raised. The Department agreed to accept responses up to and including 28 June 2010.

5. Consultation Questions

1. Do you consider that the proposed Regulations will provide improved protection for the aquatic environment?
2. Are there any activities other than those specified in draft regulation 3(2) which should be exempted from the Regulations?

3. Are the timescales for the replacement of old tanks reasonable?
4. Have you any comments to make on the sectors to which the Regulations apply?
5. Do you consider the enforcement provisions are reasonable and effective?
6. Have you any comments on particular aspects of the proposed Regulations or the regime in general?

6. Responses to Consultation

Approximately 460 organisations and individuals were consulted and 39 responses received.

Of the 39 responses received five provided nil comment, five were supportive of the proposals and 29 provided substantive comment. Whilst the substantive responses were generally supportive of the proposed Regulations key issues arose concerning the inclusion of CoMAH (Control of Major Accident Hazard) regulated sites and oil distributors, the exclusion of the domestic and agricultural sectors and the timeframe for compliance. The following sections provide discussion on these issues and the Department's response.

All comments made during the consultation process were carefully considered and two key changes have been made to the Regulations as explained below.

Details of specific comments raised on the proposed Regulations and the Department's response to those comments are set out in **Annex A**. A list of all respondents is attached at **Annex B**.

6.1 CoMAH Regulated Sites

Larger oil distribution sites, refineries and other businesses which hold 2,500 tonnes of oil or more are regulated under the Control of Major Accident Hazards Regulations (Northern Ireland) 2000 (CoMAH Regulations). Other named substances and categories of materials are also covered by the CoMAH Regulations and are enforced in Northern Ireland by the Health and Safety Executive and NIEA.

The consultation on the Oil Storage Regulations did not propose to give an exemption to CoMAH regulated sites in Northern Ireland. As detailed in Annex A a number of these sites in Northern Ireland (e.g. larger oil distributors and power stations) made several points in response to the consultation regarding the environmental protection requirements already imposed under the CoMAH Regulations and the appropriateness of these requirements in relation to the operation of these sites compared to the proposed Oil Storage Regulations.

In England and Scotland all oil distributors and refineries, including those regulated under CoMAH, are exempt from the provisions of their Oil Storage Regulations which were brought into force in 2001 and 2006 respectively.

The Department has reviewed these comments and concluded that the CoMAH Regulations which implement the Seveso II Directive (96/82/EC) should at least afford an equivalent level of environmental protection to that under the proposed Oil Storage Regulations. On this basis the Department now proposes to exempt CoMAH regulated sites storing 2,500 tonnes of oil or more from the requirements of the Oil Storage Regulations.

6.2 Oil Distribution Sites

The consultation proposed that all oil distribution sites would be regulated under the provisions of the Regulations. These range from

small family businesses to the distribution arms of some of the refiners and importers.

A number of consultees expressed concern at the inclusion of oil distribution sites within the remit of the proposed Regulations stating that these premises cannot be treated in the same way as end user tanks as they are on a far larger scale and are normally constructed and managed in accordance with the Health and Safety Publication HSG 176 - The Storage of Flammable Liquids in Tanks. Some of these consultees were also concerned about the ability of oil distribution sites to meet the proposed timescales for compliance.

Document HSG 176 is a guidance document. It provides guidance on the design, construction, operation and maintenance of installations used for storage of flammable liquids in fixed tanks operating at or near atmospheric pressure. The guidance is aimed primarily at prevention of the ignition of flammable liquids rather than protection of the water environment.

There is no equivalent legislation to the proposed Regulations in operation in Northern Ireland covering oil distribution sites other than the CoMAH Regulations which apply to sites storing 2,500 tonnes of oil or more.

Following the consultation period the Department met with representatives of the oil industry and has subsequently amended the guidance and made minor amendments to the proposed Regulations to better reflect the design and operation of oil distribution sites. As such the Department has determined that oil distribution sites, not regulated under the CoMAH Regulations, should remain within the provisions of the proposed Regulations. However, those sites which pose a lower risk to the water environment will have a longer time period in which to comply as described in section 6.5.

6.3 Agricultural Sector

Provided that the oil stored on agricultural premises is for use in connection with agricultural activity as described under the provisions of the Agriculture Act (Northern Ireland) 1949 e.g. tractors and other agricultural vehicles (not premises heating e.t.c.) then these tanks would be exempt from the proposed Regulations.

However, above ground oil storage tanks on agricultural premises are already subject to the requirements of The Control of Pollution (Silage, Slurry and Agricultural Fuel Oil Regulations (Northern Ireland) 2003 (the SSAFO Regulations). Any newly constructed or existing stores which are substantially reconstructed or enlarged post December 2003 need to meet SSAFO standards and must be notified to NIEA within appropriate timescales. NIEA may also serve a notice requiring repair, or improvement on an exempt store that is found to present a risk of pollution. If the terms of a notice in respect of improvement works are not met within the timescale, the store covered by that notice will lose its exempt status.

A number of respondents raised the issue of exemption of the agricultural fuel oil stores and in particular those in use before 1 December 2003.

The Department proposes to monitor and review the impact of storage of oil on agricultural premises on water pollution over a five-year period in line with the end of the first cycle River Basin Management Plans.

6.4 Domestic Sector

The consultation proposed that the domestic sector be exempt from the provisions of the Regulations if the storage capacity of the above ground oil tank is 3500 litres or less.

The Building Regulations (Northern Ireland) 2000 as amended by The Building (Amendment) Regulations (Northern Ireland) 2006 provide for

heating oil to be stored in an integrally bunded prefabricated tank with the bund having a capacity of not less than 110% of the tank it contains.

However, given the number of pollution incidents occurring at domestic sites the Department proposes to monitor and review the storage of oil on these premises over a five-year period in line with the end of the first cycle River Basin Management Plans.

6.5 Timeframe for compliance

Provision is made in the proposed Oil Storage Regulations for compliance in three stages:

- new storage facilities will have to comply within six months of the Regulations coming into operation;
- existing storage facilities, located within 10 metres of a waterway or 50 metres of a well, spring or borehole will have to comply within two years of the Regulations coming into operation;
- remaining existing storage facilities will have to comply within four years of the Regulations coming into operation.

A number of respondents expressed concern regarding the costs involved in meeting the timeframe for compliance, particularly in the current economic climate. One respondent considered the timescales for compliance to be too generous due to the risk posed by facilities and suggested reducing the compliance periods.

The Department has reviewed these comments and concluded that it would be reasonable to extend the timeframe for compliance for existing storage facilities not within 10 m of a waterway or 50 m of a well, spring or borehole to 31 December 2015 bringing the Oil Storage Regulations in line with the end of the first cycle River Basin Management Plans. Sites near waterways or wells, springs or

boreholes would still have to comply within two years and NIEA may also serve a notice on other high risk sites. This will allow those sites which pose a lower environmental risk additional time to acquire the funding necessary to comply with the required provisions.

ANNEX A

Summary of Comments and Departmental Response

Q1	Do you consider that the proposed Regulations will provide improved protection for the aquatic environment?	Department's Response
	17 respondents agreed that the proposed Regulations will provide improved protection for the aquatic environment with one adding that tanks used for storing oil for onward distribution should be exempted. One of the respondents also stated that improved protection will only be achieved if there are no exceptions and another stated only if enforcement is applied to all sites instead of just the larger operators.	The Department notes the support for the proposed Regulations. Oil distribution sites are discussed in section 6.2. NIEA will undertake enforcement of the proposed Regulations in accordance with its Enforcement and Prosecution Policy. Enforcement action taken will be proportionate to the risks posed to the environment and to the seriousness of the breach of the law.
	Four respondents indicated that the proposed Regulations are more relevant to small commercial sites rather than sites holding more than 2,500 tonnes. One respondent also stated that they are impracticable and unworkable for large storage terminals.	The Department proposes to exempt CoMAH regulated sites as discussed in section 6.1.
	One respondent stated that although extremely important, bunding in itself is not the answer. Good preventative maintenance, training, operational procedures and routine audits are also required.	The Department notes and agrees with these comments. These aspects are covered in the associated draft Guidance for the Regulations and NIEA is happy to provide proactive advice to stakeholders.
Q2	Are there any activities other than those specified in draft regulation 3(2) which should be exempted from the Regulations?	Department's Response
	Seven respondents stated that no other activities should be exempt.	The Department notes these comments.
	One respondent stated that agriculture should be exempt.	Agricultural fuel oil is already exempt from the proposed Regulations as discussed in section 6.3.

	One respondent stated that agriculture should not be exempt.	As discussed in section 6.3 agricultural fuel oil storage facilities are subject to the requirements of the SSAFO Regulations and the Department will monitor and review the effectiveness of these controls in line with the end of the first cycle River Basin Management Plans.
	Seven respondents stated that CoMAH (Control of Major Accident Hazards) regulated sites should be exempt.	The Department proposes to exempt CoMAH regulated sites as discussed in section 6.1.
	One respondent stated that tanks used for storing oil for onward distribution should be excluded as the requirements for bulk storage tank bunds are not the same as those for smaller commercial and domestic tanks.	The Department proposes to exempt CoMAH regulated sites but not smaller oil distribution sites as discussed in sections 6.1 and 6.2.
	Two respondents stated that domestic premises should not be exempt.	As discussed in section 6.4 domestic oil storage is subject to the requirements of the Building Regulations and the Department will monitor and review the effectiveness of these controls in line with the end of the first cycle River Basin Management Plans.
	One respondent expressed concern that containers of less than 200 litres are exempt and underground tanks other than at a petrol station are not covered by legislation.	The Department notes these comments and will monitor any impact from these storage facilities during the first cycle River Basin Management Plans.
Q3	Are the timescales for the replacement of old tanks reasonable?	Department's Response
	Six respondents stated that the timescales were reasonable.	The Department notes the support for the timescales in the proposed Regulations.
	Six respondents stated that the timescales were not reasonable for CoMAH regulated sites. The timescales for major works to existing bulk installations (CoMAH sites) is longer than in the proposed	The Department proposes to exempt CoMAH regulated sites but not smaller oil distribution sites as discussed in sections 6.1 and 6.2.

	<p>Regulations because of the considerable costs and logistics not reflected properly in the consultation partial Regulatory Impact Assessment. One of these respondents added that the timescale appeared reasonable for other facilities with another stating that they were reasonable for commercial undertakings. Another stated that the timescales were only suitable for the replacement of smaller tanks – depots and terminals could cost hundreds of thousands maybe millions.</p>	
	<p>One respondent stated that the timescales are unreasonable for tanks storing oil for onward distribution and that a separate timescale must be included to take account of the different constructional and operational circumstances and situation of tanks storing oil for onward distribution. One respondent stated that if installation is in service without any critical problems 18 months is a reasonable timeframe for upgrading. Another respondent stated that the timescale of full compliance within a 4-year period may be difficult to achieve given that potential expenditure has not been considered in their business investment cycle.</p>	<p>As discussed in section 6.5 the Department proposes to extend the timeframe for compliance of existing storage facilities not within 10 m of a waterway or 50 m of a well, spring or borehole to 31 December 2015.</p>
	<p>One respondent stated that they consider the timescales for compliance to be too generous. They suggest one year for facilities that are within 10 metres of a waterway or 50 metres of a well, spring or borehole and 2 years or less for remaining existing storage.</p>	<p>The Department notes this comment however as discussed in section 6.5 the Department proposes to extend the timeframe for compliance of existing storage facilities not within 10 m of a waterway or 50 m of a well, spring or borehole to 31 December 2015.</p>

Q4	Have you any comments to make on the sectors to which the Regulations apply?	Department's Response
	One respondent stated that the sectors to which the Regulations apply are appropriate adding that they hope there are proper mechanisms in place to identify all such facilities so that the Regulations can be enforced.	The Department notes these comments. NIEA will work proactively with stakeholders to promote compliance and will target resources in relation to the risks posed to the environment.
	Six respondents indicated that agriculture should be included. Two of these respondents suggested that The Control of Pollution (Silage, Slurry, and Agricultural Fuel Oil) Regulations (Northern Ireland) 2003 (SSAFO) should be amended and another stated that it does not seem logical that agricultural premises with existing tanks of less than 1,250 litres, built before 2003, are not required to be bunded. One respondent stated that the agricultural sector is no longer exempt in Scotland.	The Department noted these comments and as discussed in section 6.3 the Department will monitor and review the effectiveness of these controls in line with the end of the first cycle River Basin Management Plans.
	Two respondents stated that domestic storage should be included.	As discussed in section 6.4 domestic oil storage is subject to the requirements of the Building Regulations and the Department will monitor and review the effectiveness of these controls in line with the end of the first cycle River Basin Management Plans.
	One respondent stated that one-man oil distributors who have no secure storage and park their tankers overnight, full of product, are not subject to any environmental Regulations and are being overlooked.	Oil tankers are already subject to the European Agreement concerning the International Carriage of Dangerous Goods by Road (ADR).
	Three respondents stated that all sectors should have the same secondary containment requirements.	The Department notes this comment but highlights that requirements also need to be proportionate to the risk posed.

	<p>One respondent stated that storage terminals subject to CoMAH Regulations should be exempt. Three respondents stated that the proposed Regulations are more relevant to smaller commercial sites adding that a distribution site should be exempt if onward distribution is the primary business.</p>	<p>The Department proposes to exempt CoMAH regulated sites but not smaller oil distribution sites as discussed in sections 6.1 and 6.2.</p>
<p>Q5</p>	<p>Do you consider the enforcement provisions are reasonable and effective?</p>	<p>Department's Response</p>
	<p>Nine respondents agreed that the enforcement provisions are reasonable and effective. Two of these respondents added the caveat that they should be extended to all newly provided domestic oil storage above the 200 litre capacity. One of these respondents also stated that there are not enough qualified and experienced inspectors and suggested a network of private organisations could be used. Another of these respondents added that the enforcement provisions should be applied in line with the amount of damage caused by any oil spillage or leakage and the cost of removal of the oil from any water sources. Two of these respondents stated that as long as the Department is seen to carry out the proposed enforcement policy fairly across all sectors then it should be effective.</p> <p>One respondent stated that there should be strong enforcement and penalties that create a level playing field and protect compliant businesses. A more proactive advisory approach is welcomed.</p> <p>One respondent thought the penalties appropriate but raised</p>	<p>The Department notes the support for the enforcement provisions in the proposed Regulations.</p> <p>As discussed in section 6.4 domestic oil storage is subject to the requirements of the Building Regulations.</p> <p>NIEA will undertake enforcement of the proposed Regulations in accordance with its Enforcement and Prosecution Policy. Enforcement action taken will be proportionate to the risks posed to the environment and to the seriousness of the breach of the law. NIEA will work proactively with all stakeholders to promote compliance and will target resources in relation to the risks posed to the environment.</p> <p>NIEA has a network of staff based in the field dealing with a wide range of pollution response and prevention. These staff will be responsible for enforcing this legislation. The best possible use of the available staffing resource will be made to ensure maximum environmental benefit.</p>

	<p>concerns as to whether NIEA will be able to effectively monitor. They added that policing of the new regime is a crucial part of the system.</p> <p>One respondent stated that they would be surprised if resources allow the Northern Ireland Environment Agency to be anything other than reactive in the enforcement of these Regulations.</p>	
	<p>One respondent thought the enforcement provisions a little over zealous and sought clarification on the provisions under The Water (Northern Ireland) Order 1999 (the Water Order) and these proposed Regulations – could one incident result in enforcement under two separate mechanisms?</p>	<p>The Oil Storage Regulations aim to prevent water pollution whilst the Water Order deals primarily with the consequences of pollution. NIEA will apply whatever piece of legislation is most appropriate to protect the aquatic environment.</p> <p>When investigating a pollution incident NIEA will collect and present all evidence in relation to both a breach of the proposed Regulations and The Water Order. The Public Prosecution Service will decide on what basis to proceed and all evidence gathered may be presented to the court as material facts in relation to any offence. It is a matter for the courts to determine the level of fine imposed.</p>
	<p>One respondent stated that enforcement provision alone will not ensure the Regulations are effectively implemented. Provision of good guidance, information and practical advice should be made available to the sector affected.</p>	<p>NIEA has in place Pollution Prevention Guidance covering a wide range of activities likely to cause water pollution and is happy to provide proactive advice.</p>
	<p>Four respondents indicated that the CoMAH Regulations already make reasonable and effective provision for bulk storage sites.</p>	<p>The Department proposes to exempt CoMAH regulated sites as discussed in section 6.1.</p>

Q6	Have you any comments on particular aspects of the proposed Regulations or the regime in general?	Department's Response
	<p>Four respondents welcomed the proposed Regulations with one stating that under application must be joined with applicable controls. Another added that it is not clear how the Department will be able to identify all such facilities suggesting that it should publicise the new provisions and invite the general public to contact NIEA with details of any facilities that appear to pose a significant risk. They further suggested that there might be a role for voluntary organisations in promoting these Regulations to the public and perhaps an intermediary for such identification of facilities.</p>	<p>The Department notes the support for the proposed Regulations. NIEA will work proactively with all stakeholders and welcomes further discussion in relation to the role of other organisations in helping to promote compliance with the proposed Regulations.</p>
	<p>Two respondents stated that thought should be given to joint publications with the relevant oil trade associations promoting best practice and how to comply with the legislation. Also, the agricultural sector should be included as they are commercial businesses and SSAFO Regulations have not resulted in significant upgrade in environmental protection for rural farm tanks.</p>	<p>NIEA will work proactively with all stakeholders and welcomes further discussion in relation to the role of other organisations in helping to promote compliance with the proposed Regulations.</p> <p>As discussed in section 6.3 agricultural fuel oil storage facilities are subject to the requirements of the SSAFO Regulations and the Department will monitor and review the effectiveness of these controls in line with the end of the first cycle River Basin Management Plans.</p>
	<p>One respondent commented on regulation 4(4) stating that the words 'if oil has a flash point of more than 32 degrees centigrade, a pump' be removed as it suggests that if the oil has a flash point of more than 32 degrees centigrade it should be within the secondary container.</p>	<p>The Department proposes to remove this wording from regulation 4(4). However the best practice guidance will reflect the need to make sure that any oil leak would be contained within secondary containment, for example a bund or drip tray, and couldn't cause pollution.</p>
	<p>One respondent stated that the Regulations should be extended to</p>	<p>As discussed in section 6.4 domestic oil storage is subject to the requirements of</p>

	<p>all newly provided domestic storage above the 200 litre capacity.</p>	<p>the Building Regulations and the Department will monitor and review the effectiveness of these controls in line with the end of the first cycle River Basin Management Plans.</p>
	<p>Three respondents were concerned about the cost implications with two asking if grants would be available.</p>	<p>Grant funding will not be available. However as discussed in section 6.5 the Department proposes to extend the timeframe for compliance of existing storage facilities not within 10 m of a waterway or 50 m of a well, spring or borehole to 31 December 2015.</p>
	<p>One respondent recommended that the attention of duty holders is firmly drawn to Health and Safety Executive GB guidance on the siting of tanks to prevent hazards arising from fire or explosions. Another respondent raised concerns that the guidance may conflict with Fire and Rescue Service guidance. The first respondent also stated that the construction of secondary containment systems may create further hazards such as confined spaces containing hazardous atmospheres. This respondent also stated that standards of tank construction include not only BS 799 part 5 but others such as EN12285-1:2003. Also the term "container" may also refer to a UN approved drum or intermediate bulk container which is outwith the inspection regime of OFTEC Technical Booklet 3.</p>	<p>In consultation with the Health and Safety Executive (Northern Ireland) the Department has amended the draft Guidance to the proposed Regulations to clarify the relationship with relevant health and safety obligations and the various standards for tank construction.</p>
	<p>One respondent stated that underground tanks should comply with European Standard EN12285 - 1 and OFTEC Standard OFS T100 must be referenced within the Regulations.</p>	<p>The Department has amended the draft Guidance to the Regulations to better reflect the various standards for tank construction. The draft Guidance already includes reference to the OFTEC Standard OFS T100.</p>

	<p>One respondent asked why underground tanks are not included and if overfill devices are mandatory on all tanks regardless of age.</p>	<p>The Department has been advised that the majority of underground tanks are for the storage of petroleum which is already subject to the Petroleum (Consolidation) Act (Northern Ireland) 1929. The Department will continue to monitor this situation.</p> <p>Under the proposed Regulation overfill devices are mandatory on all tanks if it is not reasonably practicable to observe filling of the tank. This requirement would be regardless of age of the tank but subject to the timescales for compliance.</p>
	<p>One respondent stated that tanks with leaks, weeps, severe corrosion or severe distortion should be condemned and put out of use. Non-compliant pipework and fittings should be replaced.</p>	<p>The Department agrees with these comments and the proposed Regulations should address these issues.</p>
	<p>One respondent stated that with regard to domestic tanks they would have preferred legislation re: the construction and installation of storage facilities, to be contained within the remit of the Building Regulations.</p>	<p>As discussed in section 6.4 domestic oil storage is subject to the requirements of the Building Regulations.</p>
	<p>One respondent stated that the Regulations could be improved by requiring only bunded tanks be permitted for the use of storage of oil for heating systems.</p>	<p>Oil storage used for heating systems within the scope of the proposed Regulations will require secondary containment.</p>
	<p>One respondent stated that stricter oil containment measures are something which tank manufacturers in Northern Ireland may be able to exploit to allow companies to comply.</p>	<p>The Department notes this comment.</p>
	<p>One respondent stated that occupiers of multi-residential dwellings such as blocks of flats where oil is provided from an above ground communal facility will not be exempt. They asked how NIEA intends to communicate with those</p>	<p>NIEA will work proactively with all stakeholders and welcomes further discussion in relation to the role of other organisations in helping to promote compliance with the proposed Regulations.</p>

	consumers about the requirements of the new Regulations.	
	Eight respondents representing CoMAH sites made a number of detailed comments in relation to the appropriateness of the proposed Regulations to these sites and the already stringent requirements of the CoMAH Regulations.	The Department proposes to exempt CoMAH regulated sites as discussed in section 6.1.

ANNEX B

List of Respondents

Belfast City Council

BP Oil UK Ltd

Clarehill Plastics Ltd

Council for Nature Conservation and the Countryside

DCC Energy Ltd

Department of Enterprise, Trade & Investment

Donnelly Bros

Down District Council

Federation of Petroleum Suppliers

Geological Survey of Northern Ireland

Health & Safety Executive Northern Ireland (HSENI)

Invest NI

JAEnviro tanks

James Blake & Co (Engineers) Ltd

Kingspan Environmental Ltd

Larne Borough Council

LCC Ltd

Lisburn City Council

LSS Ltd

Northern Ireland Federation of Housing Associations (NIFHA)

Northern Ireland Ambulance Service Health and Social Care Trust

Northern Ireland Environment Link

Northern Ireland Fire & Rescue Service

Northern Ireland Judicial Appointments Commission

Northern Ireland Tourist Board

Northern Ireland Water

Oil Firing Technical Association (OFTEC)

Precision Liquids Ltd

Premier Power Ltd

Quarry Products Association (NI) Ltd

Queens University Belfast, Estates Department

Regional Planning & Transportation Division, Department for Regional Development

Sangers (NI) Ltd

Tank Storage Association

The Consumer Council

Training for Women Network (TWN)

Turkington Holdings

UK Petroleum Industry Association

Ulster Society for the Protection of the Countryside