

Dear Mr Golombeck

Further to the recent Regulation 28 of 3rd February 2025, this response is submitted on behalf of Energy Institute (EI), Association for Petroleum and Explosives Administration (APEA) and Petroleum Enforcement Liaison Group (PELG).

Firstly, all three organisations wish to pass on their sincere condolences to the family of Mr Ojerinde following these sad events.

EI

The Energy Institute (EI) is the leading chartered professional membership body supporting individuals and organisations across the energy industry. With a combined membership of over 14 000 individuals and 300 companies in 100 countries, it provides an independent focal point for the energy community and a powerful voice to engage business and industry, government, academia and the public internationally.

As a Royal Charter organisation, the EI offers professional recognition and sustains personal career development through the accreditation and delivery of training courses, conferences and publications and networking opportunities. It also runs a highly valued technical work programme, comprising original independent research and investigations, and the provision of EI technical publications to provide the international industry with information and guidance on key current and future issues.

APEA

The APEA is a UK based organisation with worldwide membership. It draws membership from those in the retail petroleum industry who are involved with the design, construction and operation of filling stations. The membership includes regulators from national and local government authorities, oil companies, equipment manufacturers, suppliers, service and installation organisations and contractors. The APEA was founded in 1958 and has the same objectives as today:

- The advancement of scientific and technical knowledge
- The supply and interchange of information
- Uniformity of standards interpretation and application

The APEA is consulted by governments and standards authorities in this specialist field. It also runs training courses, provides technical advice and holds an annual conference.

PELG

PELG was set with the aim to facilitate appropriate and consistent enforcement by Petroleum Licensing Authorities (PLAs) through the dissemination of advice, guidance and good practice.

Under the sponsorship of the Health and Safety Executive (HSE) in Great Britain, PELG was set up to devise guidance and provide advice to PLAs and licensees on the *Petroleum (Consolidation) Act 1928* and to produce circulars (PETELs). Later, the role was broadened to provide a platform for revisions to legislation and played a key part in the devising and implementation of the *Dangerous Substances and Explosive Atmospheres Regulations (DSEAR)* in Great Britain in 2002, and subsequently the *Petroleum (Consolidation) Regulations (PCR)* that came into force in Great Britain on 1st October 2014. PCR repealed the *Petroleum (Consolidation) Act 1928* and introduced a certification regime to replace petrol licencing and

separate notification of keeper arrangements. The authorities allocated to enforce PCR are referred to in the Regulations as Petroleum Enforcement Authorities (PEAs).

Aims and objectives

The aim of PELG is to facilitate appropriate and consistent enforcement by PEAs and compliance by petrol dispensing premises operators through the dissemination of advice, guidance and good practice.

PELG has six objectives; namely to:

- Discuss the need for advice and guidance (including on technical issues where there is a need for a consensus view among PEAs and HSE); to commission and agree such advice and disseminate it to PEAs and make it available to operators of petrol dispensing premises.
- Assess the implications for enforcement of new developments in technology, industry practice and procedures.
- Liaise effectively with HSE, PEA's, National Fire Chiefs Council, Environmental Agencies and the associations representing the retail petroleum industry on matters within its remit.
- Assist in finding solutions to general problems that might otherwise incur costly and time-consuming appeals.
- Ensure the principles of the Regulators' Code, as issued by BEIS is being followed.
- Advise PEAs on compliance with the National Local Authority Enforcement Code.

Comment

All incidents within the sector are taken extremely seriously and reviewed to ensure guidance and regulations remain fit for purpose.

Following the incident and subsequent Section 28, the group have reviewed both the EI(IP)/APEA's Guide the "Design, Construction, Modification, Maintenance and Decommissioning of Filling Stations" (The "Blue Book") and EI/PELG Guide "Petrol Filling Stations Guidance on managing the risks of fire and explosion" (The Red Guide), paying particular attention to the following sections of each publication;

Blue Book including [hyperlink](#)

Section 7.6 – Control Systems

Annex X – Safety Signs and Safety Information Notices.

Red Guide including [hyperlink](#)

Section 5 – Managing The Risk

Section 6.4 – Operating and Emergency Procedures

Section 7.3 – Dispensing Control Measures highlighting Section 7.3.8 – Sites operating in Unmanned Mode and Section 7.3.12 – Assessing The Risks

Annex A – CCTV Surveillance

Annex C – Training

It should be noted the guidance in place is goal setting, illustrating the fundamental principles for site operators to achieve across a spectrum of fuelling formats, with guidance to support this, however it remains for site operators to risk assess and implement appropriate control measures at premises deemed suitable to operate in such a way.

Please note additional work in relation to the operation of petrol filling stations on an unmanned basis is being undertaken by industry with the support of PELG to develop a best practice guide to further support operators beyond the standard guidance in place.

Conclusions

Having completed the review, whilst the incident has caused obvious concern, it is felt that both publications remain comprehensive and fit for purpose.

All three responding organisations and the various Trade Associations and manufacturers who they represent, remain keen to work closely with operators to ensure that risks are assessed and mitigated against to ensure incidents such as these are kept to a minimum.

Please rest assured that APEA, EI and PELG will continue to ensure that publications are reviewed on a periodic basis and updated where applicable.

Best regards

[Redacted signature]

[Redacted signature]

Secretariat

For and on behalf of Energy Institute, Petroleum Enforcement Liaison Group and
Association for Petroleum and Explosives Administration

9th April 2025