



U.S. Chemical Safety and  
Hazard Investigation Board



# **The Next Generation of Regulation for High-Reliability Organizations**

**National Academy of Public Administration**

**Washington, DC**

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**John Bresland  
Chairman**

**United States Chemical Safety Board**



## What is a High Reliability Organization?

- **Management commitment**
- **The right equipment**
- **The right people**
- **Standard procedures and training**
- **Accountability**
- **Employee feedback**
- **Emergency response preparation**
- **Leadership – must “walk the walk”**



- **Are these HROs?**

# WEST PHARMACEUTICAL INVESTIGATION - 1/29/2003





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## Imperial Sugar Company Refinery, Port Wentworth, Georgia February 7, 2008





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## T2 Laboratories Jacksonville, Florida December 19, 2007







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**Associated Press Photograph**



- **By definition, the CSB does not deal with HROs**
- **What type of regulatory program would apply to the spectrum of companies – from HROs to those who do as little as possible?**
- **Do HROs need regulation?**



## Successful regulation?

- **Water pollution control – yes**
- **Air pollution control – yes**
- **Personal safety – probably, but there are still 5,000 workplace fatalities each year**
- **Chemical facility safety – we need more data**



# Voluntary compliance

- **Nuclear power industry – INPO**
- **Chemical industry – Responsible Care**





## Alternatives to Regulation

- **Publicity and communication with stakeholders**
- **Investigation and publicity**



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