

Highlights from the MJV Workshop on SMS (Germany, 2010)

Maureen Heraty Wood IPSC-STA- Major Accident Hazards Bureau



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The MVJ Workshop Programme for Seveso Inspections

The MJV Programme is aimed to foster exchange between working inspectors and serve as a platform for communicating the highlights of those exchanges to all Seveso inspectors.

Its overall objective is to support common approaches to Seveso inspections across Europe by maintaining dialogue between Seveso inspection programmes.

It is managed by the European Commission's Joint Research Centre in consultation with the Technical Working Group on Seveso Inspections (TWG 2).



The MJV Workshops



The MJV was conceived as a workshop hosted by Member States in rotation. The Mutual Joint Visit Workshop Programme for Seveso Inspections was launched in 1999 with a workshop in the Netherlands.

Following the original MJV workshop model (now called **Phase 1**), the Dutch agenda included various presentations on its inspection programme.

In 2005 the **Phase 2** MJV workshop model was introduced, allowing host countries to focus on a **special topic**. After 2007 it was determined that all workshops would be Phase 2 workshops.

Phase 2 workshops also introduced the **MJV workshop report** which is written as a summary of good practice reflecting workshop exchanges. In 2013 the MJV "short report" was added as a quick reference for inspectors.



Past MJV Workshops



Phase 1					
The Netherlands	(1999)	France	(2001)	Spain	(2003)
Germany	(2000)	Austria	(2001)	Hungary	(2005)
Ireland	(2000)	Sweden	(2002)	Poland	(2007)
Finland	(2000)	Italy	(2002)	Romania	(2008)
United Kingdom	(2000)	Norway	(2003)		
Phase 2					
Belgium	2005		Petroleum storage depots		
United Kingdom	2006		Petroleum refineries		
The Netherlands	2006		Compliance drivers in 5 industries		
Portugal	2008		Human factors (Partial phase 2)		
Norway	2009		Industrial parks & domino effects		
Germany	2010		Safety management systems		
Finland	2011		Safety reports		
Ireland	2012		Emergency response planning		
Sweden	2013		Learning lessons from accidents		
EC-JRC-MAHB	2014		SMS in multinational companies		



MJV Publications



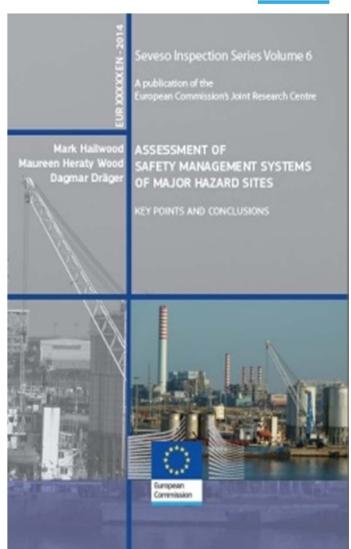
Compliance Drivers

Joint Research Centre

MJV on Safety Management Systems

European Commission

Our newest publication and the topic of this presentation





Assessment of Safety Management of Major Hazard Sites

Systems

Sereso Directos enforcement and Implementation

The selety management system (SHS) is now considered a central component of modern process selety management. It was first adopted into various Buropean national laws in the early 1990s, most autobly in the United Kingdom for offshore facilities following the 1966 Piper Alpha dissetur in the North Sea. With the advent of the Seveso II Directive in 1996 (Directive 96/62/EC), the concept of the selety menagement system was engirthed as an essential element in control of sites with major chemical bazards across the European Union. 'The Cullen Report that was issued following the Piper Alpha disselar also introduced the operator obligation to "demonstrate" that it has a safety management system and recommended that regulators employ a systematic approach to inspections that was equally focused on compliance with sefety management criteria as well as technical

With the entering into force of the Sereso III Directive) the Hember States are required to ensure that the operator of an establishment follow under the requirements of the Directive draws up a policy for the prevention of major accidents. According to Article 9 of the Directive, the operator must demonstrate that the HAPP and the SHS have been put into effect consistent with the principles erticulated in Annex IIII. The Directive also clearly states that the level of complicitly and detail of the

This Eavage Dispection Earles short report is a eummary of a tieveso trapection tiertes expert report of the sense name. The full report cen be found et: https://www.yr.ec.europe.su

safety management system should be in proportius to the level of risk present on the site.

The SHS as described in Annex III consists of the organisational structure, responsibilities, practices, procedures, processes and resources for the implementation of the HAFF. According to the Annex, the SHS must address the issues:

- · Organisation and personnel
- · Mortficetius and evaluation of major
- Operational control
- Hasagement of change
- Hensing for energeacles
- Monitoring performance
- Audit and review

Article 18 of the Directive requires conducting a systematic ecomination of the systems being employed at the establishment, whether of a tuchsical, organisational or managerial sature, so as to ensure in particular:

taken appropriate measures, in connection with the various activities involved in the establishment, to prevent reajor-accidents,

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Why a Workshop on SMS for Inspectors?

Article 18 of the Directive requires conducting a systematic examination to ensure that the operator has:

- taken appropriate measures, in connection with the various activities involved in the establishment, to prevent major-accidents
- can demonstrate that appropriate means for limiting the consequences of major-accidents, on-and off-site
- That the data and information contained in the safety report, or any other report submitted, adequately reflects the conditions on site
- That information has been supplied to the public pursuant to Article 13.

There are still widespread questions among inspectors on how to determine that adequate steps have been taken.



The key questions for the SMS workshop (2010)

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 At what point can the demonstration by the operator be considered sufficient?

 How can inspectors document evidence of deficiencies in the SMS and identify effective enforcement measures?



The MJV on SMS - Who, What, Where, When

In 2010, **Germany hosted a Mutual Joint Visit Workshop on Safety Management Systems** in Fulda (near Frankfurt). Nearly 40 inspectors from 21 countries as well as several industry representatives participated.

The workshop focused on the following SMS elements:

- Organisation and Personnel
- Identification and Evaluation of Major Hazards and Risks
- Management of Change
- Monitoring Performance, Audit and Review

The agenda consisted of a mix of presentations and break-out sessions on the above elements.

Presentations included a number of accident case studies in which the failure of one or more SMS elements was a contributing factor.



Organisation and Personnel - Outcome

COMMON SUCCESS FACTORS

- The size and core activity of the company.
- Sufficient resources allocated to safety critical activities.
- The involvement of contractors and temporary workers.
- Leadership
- Availability and involvement of employee representatives

WHAT DOES SUCCESS LOOK LIKE?

- Safety is a management agenda item
- Safety critical tasks have been systematically identified and documented.
- There is sufficient evidence that employees and contractors are involved
- Records indicate that appropriate training is routinely conducted for safety functions

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- Interviews with employees confirm procedures
- Selection and management of contractors reflect competency needs for safety
- Contractor supervision and follow-up is routine



Identification and Evaluation of Major Hazards

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COMMON SUCCESS FACTORS

- Competence
- Use of experience and feedback
- Ownership of the risk assessment
- Awareness and communication of risks

WHAT DOES SUCCESS LOOK LIKE?

- Risk assessment drives control processes
- Identification and evaluation of major hazards and risks are proportionate
- Employees and contractors are aware of the risks and their role
- Site and process risk assessments are fully documented
- Control measure recommendations and follow-up are documented
- Systematic selection and application of risk assessment methods
- The consequence analysis was conducted by a competent expert.
- The off-site risk is communicated transparently



Management of Change - Outcome

COMMON SUCCESS FACTORS

- Size of the company
- Complexity and severity of risk
- Clear and correct definition of safety relevant changes
- Clear procedures for assessing risks associated with change
- Attention to control of temporary changes
- Documentation of change and maintenance of corporate memory.

WHAT DOES SUCCESS LOOK LIKE?

- Within company policy a safety relevant change is clearly defined
- MoC process has a systematic hazard identification and evaluation process.

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- MoC procedures are known by all personnel and applied systematically.
- Initiated changes are tracked all the way through to close-out
- All changes are documented in procedures, P&ID, etc.
- Temporary changes are closed out and are not permanent by default.
- Responsibilities are defined for initiating, authorising, completing changes
- The MoC process is led by management



Monitoring Performance, Audit and Review - Outcome

COMMON SUCCESS FACTORS

- Focus on relevant processes and functions
- Availability of resources
- Management commitment
- Quality of audits and monitoring
- Appropriate selection of process safety performance criteria and indicators

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• **Use of findings** to drive improvement

WHAT DOES SUCCESS LOOK LIKE?

- Evidence that the appropriate behaviours and activities have taken place
- Senior management views the audit as an important activity
- Management is involved in meetings to prepare for audits/discuss results
- The audit process completes the entire feedback loop of the PDCA cycle
- All elements of the SMS are reviewed; results are fed back into the system



The 2014 MJV Workshop

Builds on the outcomes of the 2010 Workshop with a focus on the the relationship between headquarters and the local site

The first question might be:

 What evidence demonstrates a positive or negative influence on the SMS from corporate management factors?

The second question remains the same with a slight change:

 How can inspectors document evidence of deficiencies in the SMS and identify effective enforcement measures?





THANK YOU FOR YOUR ATTENTION

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