
WEBINAR ON SEVESO ENFORCEMENT AND SITE RISK MANAGEMENT DURING THE COVID-19 PANDEMIC (Seveso)

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Some critical issues for SMS Managing in small-medium industrial sites during the COVID-19 Pandemic

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THE IMPACT OF THE COVID-19 CRISIS ON THE OPERATION OF HAZARDOUS INSTALLATIONS – GENERAL ISSUES

- no sensitive impact on operational activities, all managed in respect of safety anti-COVID
- no stop activities, except during lock-down period (2 months) for some establishments, but only some cases of reduction-variation of production due to marketplace instability (caused by lock-down)
- change-increasing of production for some activities (like pharmaceutical, chemical, ...)
- sale reduction of final products, in many cases managed by storage of them (refineries...)
- Health and Safety special Regulation issued (March 2020) to protect employers' safety in work

SOME CRITICAL ISSUES FOR SMS MANAGING IN SMALL-MEDIUM INDUSTRIAL SITES DURING THE COVID-19 PANDEMIC

- Personnel – employees management issues
- Emergency planning issues
- Maintenance issues
- SMS inspection re-organization
- Other critical issues

➔ MANAGEMENT OF CHANGE ISSUES

SOME CRITICAL ISSUES FOR SMS MANAGING IN SMALL-MEDIUM INDUSTRIAL SITES DURING THE COVID-19 PANDEMIC

Personnel – employees management issues (1)

- Transportation: transporting people to and from facilities has been arranged in order to ensure safe conditions (avoiding use public transport and organizing another means of transport, ex. shuttle bus or private cars...). In some cases transport has been blocked (for central roles coming from other regions). Other cases need specific protocols for transport. Quarantine periods for travelling workers, mental-psychological stress associated with being away from families for extended periods – **SMALL MEDIUM SITES: being part of corporate group, they are subject to central regulations which prohibited transport to/from all the whole country (for the focal/central roles like operator, RSPP, HSE manager, central auditor, ...) also before the lock-down**
- Shift handover: needed to be done in a socially distanced way, even if face mask must be worn necessary; sometimes it included relocation of workers from other expertise areas – **SMALL MEDIUM SITES: having few personnel, they don't have available workers from other areas**

SOME CRITICAL ISSUES FOR SMS MANAGING IN SMALL-MEDIUM INDUSTRIAL SITES DURING THE COVID-19 PANDEMIC

Personnel – employees management issues (2)

- Personnel reduction, due to COVID-19 infection, transport limited, personal matters, work re-organization measures adopted (limitations on the co-existence of personnel in confined areas): leading to reduced employment and impact on the management of the emergency planning, the maintenance, the operating procedures with reduced staff, and subsequent re-commissioning or starting-up post lockdown – **SMALL MEDIUM SITES: having few personnel, they don't have other available workers (in particular the Site Director); sometimes used the temporary work**
- Contractors: limited access to highly specialized contractors, due to travel limitations, and associated concerns over reductions in maintenance – **SMALL MEDIUM SITES: they normally delegate some activities (maintenance, transportation, ...) to contractors, used not only for highly specialized matters (ex. RSPP, Safety consultant, ...); reducing their services due to COVID-19 restrictions left small sites often in difficult situation**
- Training: re-scheduling and limitations on personnel training activities (due to personnel reduction and co-existence limitations) – **SMALL MEDIUM SITES: strong reduction of activities (especially for training on site) limited to remote meeting and self-training on-line**

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Emergency planning issues

- impact on the composition of the emergency team due to personnel reduction: situations of limited availability or absence of personnel; additional personnel must be trained in the short term and exercised - **SMALL MEDIUM SITES: postponed emergency exercises planned for 2020 → need of strong ER training refresh in the new year**
- revision of IEP and emergency requirements: to ensure a suitable response, including COVID-19 response
- reduction/delay of certain activities, if adequate emergency response cannot be done

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Maintenance issues

- difficulty respecting the maintenance activities planned, with particular attention to critical technical elements (problem of availability of maintenance personnel, own or of third-party companies, availability of warehouse material)
– **SMALL MEDIUM SITES: no maintenance during lock-down; need of risk assessment to ensure the delay can be implemented safely, to guarantee reliability of the equipments; additional contract stipulated for surveillance activity to ensure plants safeguard**
- troubleshooting and specific maintenance: difficult for contractors to attend site
- delaying maintenance and accumulation of work: need a plan review for restarting of activities

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SMS inspection re-organization

- remote or hybrid inspection experimented to maintain communication with sites: most on-site inspections suspended; new procedure introduced. Remote document verification privileged, and on-site inspection focused only on the plants, for the collection of objective evidence
- on-site inspection strongly reduced: anyway it needs to be performed in safe, in respect of site access protocols and related health measures
- inspectors working from home: distraction and stress due to family matters under COVID-19

SMALL MEDIUM SITES: not easy internet connection; difficulty in sharing material/documents also together with central referents (for corporate organization); not always available enough personnel for discussing or to carry out the on-site inspection

FLASH: NEW CRITERIA IN ITALY FOR INSPECTIONS DURING COVID-19 PANDEMIC

- **3 steps**
 - **Step 1 (VdC)** – preparation of inspection by acquisition of preliminary documents; communication to the company about the new inspection procedure
 - **Step 2 (VdC + site)** – documents analysis (in remote) and inspection in site (to complete the analysis and to verify the emergency simulation and the operational control)
 - **Step 3 (VdC)** – conclusion: final report writing and sharing with the company
- similar procedure for IED establishment
- never stop inspection activities, only short interruption (March – June 2020), in respect of the safety measures anti-COVID
- current recovery of inspection planned during lock-down, to guarantee the 80% of annual activities

SOME CRITICAL ISSUES FOR SMS MANAGING IN SMALL-MEDIUM INDUSTRIAL SITES DURING THE COVID-19 PANDEMIC

Other critical issues for SMALL MEDIUM SITES:

- Internal/external SMS Audit reduction/interruption
- Performance indicators monitoring reduction/interruption
- SMS update-revision reduction/interruption
- Activities planning no more possible for long time: up to max. 2 weeks, especially for those sites which production is connected with other sites, due to the uncertainty and restrictions climate of pandemic
- Strong slowdown of all the activities/works due to respect of anti-COVID protocols

DEFINITELY, FOR ALL THE HAZARDOUS INSTALLATIONS, COVID-19 CRISIS...

WAS A VERY UNIQUE CASE OF Management of change:

- changes for personnel organization/management and for training activities
- changes or additions to the Safety Management System documents/procedures
- a new and complete risks assessment associated with any non-operational status or reduced operation of the plants, linked to the presence of dangerous substances
- change for actions/measures planning in respect of anti-COVID protocols
- change for operational control, maintenance planning and work permit
- change for emergency requirements and procedures
- change for inspection procedure; future inspection methods will include COVID-19 management in the inspection scope

A SUITABLE AND DETAILED RISK ASSESSMENT REVIEW NEED TO BE CARRY OUT FOR MANAGING THE CHANGES ABOVE IN SAFE

THE IMPRESSION IS THAT IT WILL BE NOT A TEMPORARY CHANGE, BUT A DEFINITIVE ONE!