

**Survey for MJV Workshop on Lower Tier Sites
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Summary of the Results**

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How do LT sites differ from UT sites by requirements from the Seveso III Directive

- Less amounts of substances
- Only MAPP (MAPP is not a „mini-safety report“ required by the Directive, only a short policy paper!)
- No safety report
- No explicit requirement for an SMS (LT: the obligation to implement the MAPP “*may be fulfilled by other appropriate means*”)
- No internal/external emergency plan
- Land-use planning only on the basis of available information = notification
- Limited information to the public requirements
- Longer mandatory inspection intervall

Survey Summary

- 24 responses from 20 participating member states (Italy and Sweden 2x, Germany 3x)
- Different amount of information (some responses contained full lists of sites, some with rough estimations about numbers and characteristics) → numerical evaluation was not possible for some responses
- Some answers show no clear patterns, but for some important questions certain main focal items were expressed

1. What type of lower tier sites do you inspect in relation to chemical risk/industry type. Factors to be considered could be:

- Substances
 - Kinds of industries
 - Age of the facilities
 - Number of staff present
 - Multi-national or single site
 - Possible common characteristics
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- A significant number of responses assessed that LT sites have all sorts of substances (only the inventory amount is smaller), but certain types of industries and substances are typical for LT

 - A majority of LT industry types are storage facilities

- Typical and common LT sites (not storage):
 - Electroplating/Galvanic
 - Resin Production
 - Pulp & Paper
 - Fertilizer Production

- Typical substances in LT sites:
 - Flammable liquids
 - LPG/LNG
 - Explosives and Pyrotechnics
 - Oxygen
 - Ammonium Nitrate

- Age of LT sites: most responses quoted that there is no significant pattern, few responses mention that LT sites in their country are comparatively old, 30 – 50 years
- The number of employees in LT sites is usually smaller than in UT, including the SMS – relevant personnel
- Some LT sites belong to multi-national companies, but the majority of answers quoted that this is not the case for most of their LT sites

2. How do your lower tier sites differ from upper tier sites, in terms of general characteristics, such as area, management, workers, production volume, location to urban or sensitive areas etc.? Is there a general trend? Or are they mostly the same?

- There is obviously no general pattern for LT sites except the trivial factors (smaller size, smaller number of workers, smaller inventory amount)
- Smaller production amount for those sites that are not storage facilities
- Management characteristics are rather included in question 5 (challenges)
- Location: not general pattern in most cases, in some responses LT - locations in isolated areas or in urban areas are mentioned, but do not represent a significant majority
- Other specific characteristics are: HQ in another country or monitoring is carried out from abroad with no staff present

3. Do you apply any upper tier Seveso requirements to lower tier sites? If so, which ones (e.g., external emergency planning, safety reports, info to the public, name as many are appropriate ...)

Remark: The overall number of examples below which have stricter requirements exceeds the total of 24 answers because in certain MS more than one stricter requirement applies (e. g. SMS and land-use planning scenarios)

- 10 responses of MS state that there is no stricter requirement for LT sites
- In 7 answers it is quoted that stricter requirements for emergency planning for LT sites are foreseen by national legislation – the responses do not allow in all cases if this applies both for internal and external emergency plans or only for one of those

- In 5 MS there are stricter requirements for „Information to the Public“ – it is not clear from the answers how this differs from the basic requirements of Article 14 (1) and part 1 of annex V of the Directive
- 6 MS demand a „mini – safety report“ for LT sites to demonstrate the implementation of the MAPP
- 4 replies quote that LT sites must provide scenarios for land-use planning purposes
- 2 MS require an SMS for LT sites

4. How does your strategic approach to lower site tier site inspections differ from that of upper tier sites (if at all), e.g., frequency, planning, duration, etc.?

- All responses state that their strategic approach of inspections for LT sites is not different like the one for UT sites; there is always a risk-based framework for the inspection planning, sometimes in a more official format, sometimes a pragmatic code-of-practice
- 14 replies explain that the inspection interval is the Directive one (3 years), shorter if necessary (e. g. in the case of negative inspection results)
- 3 MS have stricter intervals (1 year/2 years)
- 4 MS have flexible intervals from 3 to 5 years
- 3 MS have “fully flexible” intervals resulting from a site-specific risk assessment

5. What are your main challenges in enforcement and monitoring risk management on lower tier sites?

- Lack of knowledge of LT personnel and management about Seveso-relevant factors
- Lack of capacity for risk analysis and updating documentation in LT management
- Not enough administrative resources for performing inspections
- Low quality of documentation
- Low of SMS procedures
- Lack of competencies about risk analysis methodologies at LT sites
- Not enough awareness of the major accident potential of the LT site
- LT management does not understand the difference between occupational safety issues and Seveso – relevant factors
- Not enough resources in the LT company management for documentation or testing