

Mutual Joint Visit Workshop for Seveso Inspections on
External Emergency Planning-Coordination between authorities

Organized by the Italian Competent Authorities
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Survey of inspection and authority practices

Michael Struckl

External JRC Consultant

Survey Overview

- Usual preparation for the MJV
- Provides an overview of the situation with respect to the MJV topic
- Shall supply input for breakout sessions
- 15 questions decided by the technical advisory group for the MJV

Questions 2, 3, 4 and 5

Responses/countries

24 responses from 19 countries

“What is the jurisdiction of your authority?”

20 national, 4 regional

“What is the main focus of the organisation?”

14 environmental, 6 civil protection, 4 occupational safety

“Are you a Seveso inspector?”

13 yes, 5 state administration, 6 specific tasks or general inspection

Question 6

“How is your role (as inspector or other function) related to external emergency planning on Seveso sites? Please explain in your own words”

- Some answers mixed with question 9 (restricted to the role of the Seveso inspector, no other functions)
- In general, either no or limited role or linkage with “typical” inspection elements (safety report, internal emergency plan, consequence analysis)
- Some responses from “outside”: “higher-up” government, external consultants

Question 6

Typical answers:

- No or limited role with respect to external emergency response (advisory body or scientific support)
- Inspection of safety report and/or internal emergency plan (IEP) as basis for the external emergency plan (EEP)
- Evaluation of the notification form with the information for the EEP
- Checking of documentation submitted by operator
- Checking of scenario selection and consequence analysis
- Examining resources and training status
- Minority: (Full) investigation of EEP (2 of 24)

Question 7

“Which authority (or authorities) on what level of administration (e.g., local, regional, national) is/are responsible for drawing up external emergency plans for Seveso sites in your country?”

N/R/L	N/R	R/L	N/R	L	R	N
5	2	2	2	2	2	4

N	R	L
13	13	10

Question 8

“Does your country’s transposition of the Seveso Directive add any additional requirements for external emergency planning?”

- 12x No
 - 6 x various extensions or additional requirements (to lower tier, other hazards, stricter deadlines, different thresholds)
 - 1x obligatory link with land-use planning
- (basis 19 countries)

Question 9

“What does the Seveso inspector inspect with respect to emergency response?”

- Again mixture with question 6 (double answers)
- Answers given with no reference to the personal role (civil protection vs. environment) – see question 4 and 5
- → Different national designations of a “Seveso Inspector”

Question 9

Typical answers:

- No direct tasks or restricted to IEP (IEP exists, and if communication to external forces took place)
- Description of scenarios and alarm systems
- Check operator awareness of Seveso-related duties
- Inspect emergency response management in general (if the inspector is from environmental side, his role is sometimes subsidiary)
- Check implementation of the EEP
- Take part in drills, look at emergency exercise protocols

Question 10

“Please indicate the main sources for the external emergency plan on a scale of 1 to 3, with 1 being the least important, 2 being somewhat important, and 3 being the most important”

	SCORE		
	3	2	1
Internal Emergency Plan	16	5	0
Safety Report	13	8	2
National Emergency Response Plan	5	9	8
Specific Accident Scenarios	16	3	4
Description of potential external impacts and areas affected	12	7	2
<i>Remark: answers with multiple scoring (more than one „3“ etc.), some with 0</i>			

Question 11

“Is there a “feedback loop” from emergency response exercises to the Seveso inspector? In other words, does the inspector receive relevant information, and can the inspector deliver input to the exercises for the future?”

9x yes, 3x No, 11x somewhat, 1x no answer

Typical “yes” or “somewhat” answers: participation in emergency exercise, formal or informal cooperation or communication with response forces, possibility to make proposals or input for EEP

Question 12

“In your opinion, in regard to the Seveso implementation of external emergency response as implemented in your country?”

What works well (examples)?:

- Cooperation between authorities and establishments.
- Exercises are planned and performed according to given criteria
- Communication among all the stakeholders
- Cooperation among relevant authorities
- Rescue authorities participate in the inspections and can give their opinion in the permitting process
- Emergency drills and table-top exercises

Question 12

“In your opinion, in regard to the Seveso implementation of external emergency response as implemented in your country?”

What does not work well (examples)?:

- No realistic scenarios and assumptions.
- No feedback loop from the exercises to the Seveso inspectors.
- No uniform approach of the activation of the alert systems
- Sometimes ignorance of the real danger
- Implementing lessons in future exercises.
- Little visibility on effectiveness of external emergency planning.
- Quality assurance of external emergency planning

Question 13/14

“Specifically, in regard to coordination and communication between authorities, how well do they work in your opinion? (Scale 1 to 10)”

1	2	3	4	5	6	7	8	9	10	∅
-	-	1x	-	2x	3x	9x	4x	2x	3x	7,25

“Do you have confidence in your systems efficiency?”

18x yes, 3x in some aspects only, 2x cannot say

Question 15

Additional comments:

- Information on hazards missing in the case of below-limit establishments
- Consultation of the population
- Some municipalities with no official external plans or some external plans are more a “paper tiger”
- National early-warning system under development to complement the local system
- Importance of transitioning of knowledge between different 'generations' of rescue workers
- Better and stricter national guidance needed
- Relevance of scenarios is sometimes doubtful

Conclusions and observations

- Internal emergency plan, safety report and specific scenarios are seen as the main sources for the external emergency plan
- „Typical“ Seveso inspectors check the sources for the external emergency response (safety report, internal emergency plan, consequence analysis, scenarios) – how do/can they know what's needed for that purpose? – Link to remarks about missing feedback
- Critical remarks about the scenario selection and relevance → derivation of the scenarios might be interesting to explore
- Some interface elements are obviously only voluntary: participation in emergency response exercises, resource requirement definition

Conclusions and observations

- Pro and Con answers concerning communication flow between stakeholders
- Much confidence in the efficiency of the system (question 14), but not “overwhelming” (average 7,25 of 10)
- Some critical remarks about the quality of the EEP stemming from the level of responsibility (municipalities)