

# CIC - Follow up of (sub)contractors



## **Purpose:**

Guide inspectors to assess the Seveso companies system for selection and management of (sub)contractors.

The role of Seveso inspectors is to verify that the operator is managing correctly the risks involved in using (sub)contractors.

- According to the Annex III in the Seveso Directive the operators shall address the risk connected to the use of subcontractors in their (SMS).
  - connected to organisation and personnel and training;
  - identification of and evaluation of risks and
  - training and involvement in planning for emergencies.

# CIC - (sub)contractors



- The wording of the Directive (subcontractors) covers both contractors and subcontractors (all the external workers on site).
  - **Contractor:** A company that is hired by a (Seveso) establishment to perform work on a contract basis.
  - **Subcontractor:** Subcontractors **undertake a contract from the contractor**. Subcontractors undertake work that a contractor cannot do but for which the contractor is responsible.
- The document focus primarily on contractors that are hired for a specific task/job during a specific limited duration of time, and not those that are present on the site on a permanent basis.

# Contractors and impact on risk control

- Experiences from accident analysis – common factors:
  - Selecting the contractor on the basis of the lowest possible price;
  - Lack of proper hazard identification and risk evaluation;
  - Insufficient training of contractors;
  - Insufficient communication between the operator and the contractor;
  - Lack of compliance to safety requirements;
  - Deviation from job procedure;
  - Lack of attention to warning signs.
- The risk of contracted personnel
- The benefits of using contractors

# CIC - (sub)contractors - content



- Operators role, responsibilities and follow up of contractors
  - 8 steps to follow by the operator to ensure safety when using contractors.
  - From planning the job (identifying risk) to reviewing and evaluating the work and the process.
- Annex with Potential inspection question and verification issues