



REPUBLIKA HRVATSKA

MINISTARSTVO ZAŠTITE
OKOLIŠA I ENERGETIKE

TEHNICAL WORKING GROUP 2 ON SEVESO INSPECTIONS (TWG2)

**NEW ISSUES FOR SAFETY REPORTS UNDER
SEVESO III DIRECTIVE
IN THE REPUBLIC OF CROATIA**

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SEVESO sites in Croatia

59 SEVESO sites in Croatia

➤ 27 Upper-tier installations

24 have consent on SR

3 are in process

<http://rpot.azo.hr/rpot/>



SEVESO sites in Croatia

LPG Storage CRODUX PLIN d.o.o. in Sv. Križ Začretje:



SEVESO sites in Croatia

Warehouse of petroleum products in Zabok



SEVESO sites in Croatia

Crude oil depot under construction
3.10.2016. , JANAF d.d. Omišalj



Crude oil depot
16.10.2017. , JANAF d.d. Omišalj



SEVESO sites in Croatia

Capacities for bio-fuel
JANAF d.d. Omišalj



Unloading area
JANAF d.d. Omišalj



Safety reports

A good safety report allows the authorities to get a clear overview :

- of what could happen, how accidents are prevented and what is being done to ensure that if an accident occurred
- how consequences can be minimized, a clear mitigation plan is in place

Safety report should be:

- a dynamic, living document that helps companies control and take into account the potential for major accident hazards in various operational decisions
- comprehensive, informative and accurate

The safety report is, however, still only a report compiled for the authorities

Legal requirements

Transposition of SEVESO III Directive:

Environmental protection act (OG no. 80/13, 153/13, 78/15 , 12/18)

- An operator who establishes that a large quantity of dangerous substance is present on the site is obliged to make a Safety Report (Article 122. paragraph 1)
- The operator is obliged to obtain the approval of the Ministry on the Safety Report (Article 124.)
- In the procedure of approval of Safety report Minister appointed Expert council (Article 126.)

Regulation on the prevention of major accidents involving dangerous substances (OG no. 44/14, 31/17, 45/17) (further on: Regulation)

- The Safety Report should be made by a licenced legal person, authorized in accordance with the Law (article 17. paragraph 4)

Procedure to Approval of a Safety reports

Submitting request:

- Operator submit the request for consent to the Safety Report in writing form and stored on an electronic media for the storage of data (CD, DVD or the like) and must contain a Safety Report for which consent is required.
- The Ministry is obliged to inform the public and the public concerned of the request after it determines that the request contains all the prescribed data and evidence and that the Safety Report contains all the prescribed information
- Information of request is published on the web site of Ministry www.mzoe.hr
- The public is informed about the request in accordance with the Act and the INFO Regulation which regulates information and public participation and public interest in environmental issues.

Procedure to Approval of a Safety reports

The Minister issue a decision on the appointment of Expert Council.

The Expert Council consists of representatives:

- Ministry of environment protection and energy (president and vice president of expert council)

Members:

- Institute of toxicology and antidote
- Ministry of health
- National Protection and Rescue Directorate
- Ministry of Internal Affairs
- Ministry of work and pension system



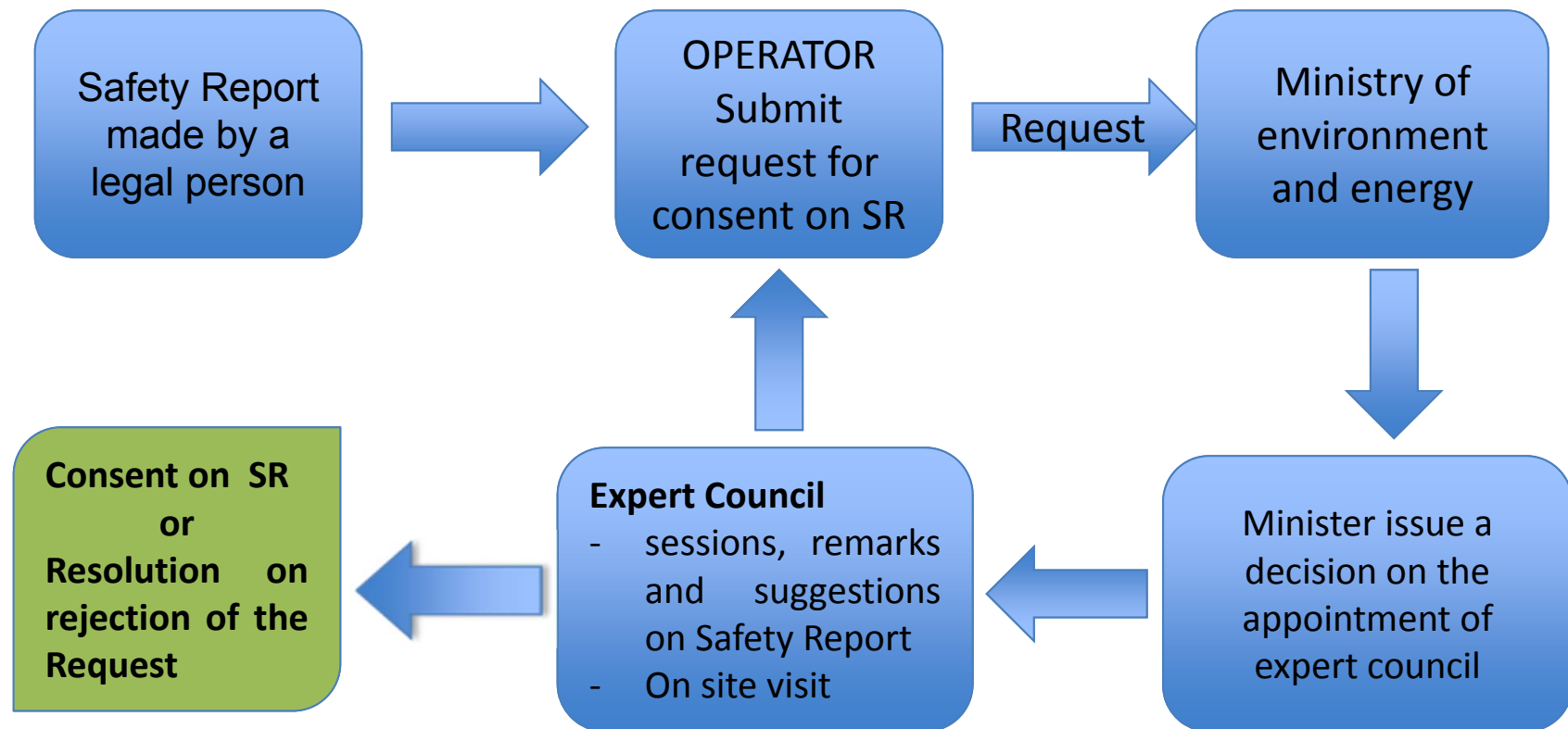
Procedure to Approval of a Safety reports

- Having determined that the Request is an order Ministry (president of expert council) will call the first session of the Expert Council for opinion on the Safety Report (Costs of obtaining consent are provided by the operator).
- The sessions are also attended by representatives of the operator and the authorized person who created Safety Report.
- Approval of the Safety Report shall be issued by the Ministry on the basis of the opinion of the Expert Council within 60 days of the submission of a formal request.
- Approval of the Safety Report can be provided when it is established that the Safety Report has met all requirements under the provisions of Regulation and a special regulation regulating spatial planning.
- When Safety Report does not meet all requirements under the provisions of Regulation and the special regulation governing the physical planning, the Ministry will issue a decision on the rejection of the Request.

Procedure to Approval of a Safety reports

- Consent among the rest shall include a statement endorsing the Safety Report, the period for which consent is given, the statement that the Safety Report is a mandatory attachment of consent and an appropriate explanation.
- On the approval of the Security Report or Resolution on rejection of the Request, Ministry is obliged to inform the public and the interested public in accordance with the law and the INFO Regulation which regulates information and public participation and public interest in environmental issues.
- The consent is issued for a period of 5 years.

Procedure to Approval of a Safety reports



Task of Expert council

Expert Council (members, representatives of operator and legal person who make Safety report):

- Attend sessions
- Each member of expert council give remarks and suggestions on Safety Report
- Responsibility of authorized person to takes into account the remarks and to make corrections in Safety Report (in cooperation with operator)
- On site visit – to determine whether the condition stated in the Safety Report corresponds to the real state of the site
- Gives the opinion whether the safety report contains the prescribed parts and whether it is in accordance with the condition at the operator's location

Benefits of Expert council

- Integrated and interdisciplinary approach from the CA side
- Raising the awareness of hazardous properties of present substances
- Discussion about self identification between operator and competent authorities according new CLP regulation
- Building better understanding of risks and risk analysis between operator, licenced persons and competent authorities
- Emphasizing the relation between emergency preparedness and response and recognised scenarios

Challenges of Expert council

Working in Expert council is a very demanding task.

CHALLENGE

- Different opinions members of expert council about same things/problems
- General knowledge about Safety reports and the spirit of SEVESO directive
- Expert knowledge in national SEVESO legislation
- Technical expert knowledge about installations
- Hazard identification and risk assessment



Challenges of Expert council

- Superficially written Safety reports by legal authorized person
- On site visite - a situation at a location other than the one mentioned in the Safety report
- Are scenarios used right ones
- Comparing safety levels on different plants
- Differences in the quality of Safety report and the actual level of safety at the site
- At what point can the demonstration by the operator be considered sufficient?



Conclusion

- Sharing knowledge and experience among members of expert council could be very useful for good practice in process of giving consent/approval to Safety Reports
- Additional education and workshops for members of Expert council should be useful
- The effort put into the safety report by companies and licenced persons which make report should be better
- The approval procedure including the work of the expert council significantly contributed to the quality of the Safety report



**THANK YOU
FOR YOUR
ATTENTION**