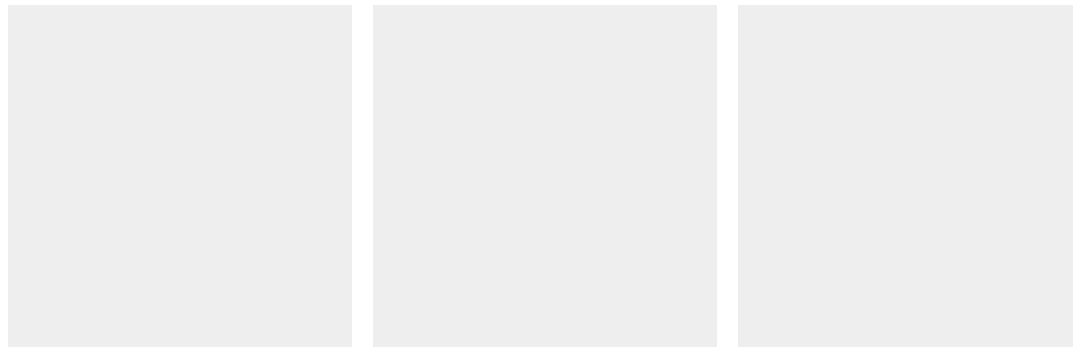


Integrating Seveso and IED Controls: Swedish Experiences and Practical Lessons

County Administrative Board
of Norrbotten



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Why Swedish experiences are relevant

- Many Swedish industrial sites fall under **both Seveso and IED**.
- Sweden applies **two parallel regulatory frameworks** with different purposes.
- The **inspection structure** (regional vs. municipal) strongly influences what joint inspections are possible.
- Sweden uses a **pragmatic model**: coordination when useful, separation when necessary.



Legal basis for coordinated inspections in Sweden

The Seveso Directive (recital 26) encourages Member States to coordinate Seveso inspections with other EU legislation, including the industrial Emissions Directive (IED). Sweden has implemented this requirement more broadly. According to Section 20 of the Swedish Seveso Ordinance, the County Administrative Board must coordinate Seveso inspections with the supervision carried out under the Environmental Code - not only IED - *to the extent appropriate*. This broader implementation forms the basis for Sweden's more integrated approach to combined inspections.



Two frameworks, two purposes

Seveso Directive (Sweden: Seveso Act)

- Prevent and limit consequences of major chemical accidents.
- Focus on **process safety**, accident scenarios, emergency planning.
- Inspections always by **County Administrative Boards**.
- Safety reports, safety management systems.

Industrial Emissions Directive (IED)

- Reduce emissions during normal operation.
- Focus on **environmental performance**, BAT conclusions.
- Inspections by **County Administrative Boards or municipalities**.
- Emission limits, monitoring, status reports.



Key differences

Aspect	Seveso	IED
Main focus	Accident risk, process safety	Emissions, environmental protection
Scenario	Abnormal events	Normal operation
Inspector	Always regional	Regional or municipal
Core requirement	Safety report / SMS	BAT conclusions / EMS
Typical question	"What if the tank explodes?"	"How much NOx is emitted?"



Swedish inspection structure

Why it matters for joint inspections

- **Seveso inspections**
 - Always County Administrative Board
 - Requires specific competence
 - Never municipal
- **IED/Environmental Code inspections**
 - County Administrative Board or municipality
 - Sometimes same inspector as Seveso, sometimes different specialists

This structure determines **when** and **how** joint inspections can be done.



Practical consequences for joint Seveso – IED inspections

When joint inspections work well

- When the Seveso scope is **limited and well defined** (e.g., follow-up on emergency planning).
- When **the same inspector** handles both frameworks.
- When the operator has **different representatives** for environmental vs. safety issues.
- When inspectors can **coordinate but keep meetings separate**, improving clarity and focus.



When joint inspections are not suitable

- When the Seveso inspection is **broad or comprehensive** (e.g., full SMS review)
- When many specialists from the operator need to attend → **too large groups.**
- When the environmental inspection is **municipal** and the Seveso inspection is **regional** → difficult to combine.
- When topics risk being mixed → **reduced clarity and lower inspection quality.**



Swedish practice: How we organise coordinated inspections

Coordinated but separate sessions

- Seveso and IED inspections are often **scheduled on the same day**, but held as **two distinct meetings**.
- The order varies depending on the purpose of the visit:
- **IED first**, followed by Seveso – common when Seveso topics are limited or follow-up related.
- **Seveso first**, followed by IED – used when safety issues require early focus or specific personnel.



Swedish practice: How we organise coordinated inspections

Why this approach works

- Keeping the sessions separate ensures **clear boundaries** between safety (Seveso) and environmental (IED) topics.
- The right company representatives can attend each part, improving **efficiency and relevance**.
- The environmental inspector's notes often **complement** the Seveso notes, which simplifies reporting. (Also the other way around.)



Swedish practice: How we organise coordinated inspections

Reporting structure

- Two separate inspection reports are always produced:
 - **One Seveso report**
 - **One IED/Environmental Code report**
- This maintains clarity for the operator and supports follow-up within each regulatory framework.

Limitations

- For **larger or comprehensive Seveso inspections** (e.g., full SMS review), coordination is avoided entirely to maintain focus and quality.



Example from Swedish practice

Pulp and paper mill – emergency planning follow-up

- IED inspection held first
- Seveso follow-up inspection held afterwards, as a separate meeting
- Different company representatives attended each part
- Shared note-taking improved reporting
- Result:
 - Clearer focus
 - Efficient follow-up
 - Reduced burden for the operator
 - Two distinct reports



Impacts on management systems

For operators subject to both Seveso and IED

- They maintain **two parallel systems**:
 - Safety Management System (SMS)
 - Environmental Management System (EMS)
- Coordinated inspections can highlight:
 - Gaps between SMS and EMS
 - Opportunities for integration
- But overly broad joint inspections can:
 - Create confusion
 - Blur responsibilities
 - Reduce the quality of the findings

Sweden therefore prioritises **clarity and quality** over formal coordination.



Swedish approach in one sentence

Sweden integrates Seveso and IED controls when it adds value – but separates them when necessary to maintain clarity, focus and high-quality inspections.



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Closing

Key takeaways

- Two frameworks, two purposes
- Inspection structure shapes what is possible
- Joint inspections work best when topics are limited
- Separate sessions often give the best results
- Management systems benefit from clarity and focused inspections





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Thanks!

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