The national system of Seveso controls: roles, responsibilities, coordination, specific tasks of SNPA

Inspections and controls In seveso and ied establishments:
Possible integrations For simplification purposes
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Inspection planning

- For routine inspections The Ministry of the Interior draw up, in collaboration with ISPRA, a national inspection plan covering all Upper-tier establishments located in the national territory
- The Regions draw up regional inspection plans covering all the Lower-tier establishments within their respective territories. The Ministry of the Interior and the Regions, in collaboration with ISPRA, ensure the coordination and harmonization of inspection plans of their respective competence
- The Ministry of the Interior and the regions periodically review and, where appropriate, update the inspection plans of their own competence by exchanging the information necessary to ensure their coordination and harmonization

- **The inspection plan shall take into account the criteria from (a) to (h) provided for in Article 20 of the Directive**

Inspection planning

- Where applicable, provisions concerning cooperation between the various authorities that carry out inspections at the establishment, with particular regard to controls carried out to verify the implementation of REACH Regulation and compliance with the requirements of the Integrated Environmental Authorization

Qualification of the inspectors-1

- The inspection staff is selected among the personnel belonging to:
  - The national technical bodies (Fire brigades, Occupational safety, National environmental inspectorate)
  - To Regional and Provincial Agencies for the Protection of the Environment
  - To the Region or to the Autonomous Province which is territorially competent
  - To National Office for mining (for underground storage of natural gas)
  - For UT establishments the group is fixed:

3 authorities: fire protection, occupational safety, environmental protection

Qualification of the inspectors-2

- The personnel in charge must have at least one of the following requirements:
  - Have carried out an adequate number of inspections (under Seveso II)
  - Proven experience of at least five years in the field of safety management systems with a period of training on site with participation in at least two inspections as trainee
  - To attend a special training course, successfully completing the final test, training on site attending at least three inspections as trainee

General objectives of inspections-1

- The main objective of the inspection is to assess the adequacy of the major accident prevention policy implemented by the operator and the related safety management system.
- The inspection must be organized in such a way as to allow for a planned and systematic examination of the technical, organizational, and management systems, in particular through:
  - verification of the conformity of the safety management system
  - verifying that the operator has adopted the measures and means provided for the prevention of major accidents and the limitation of their consequences:
    - from an organizational and management point of view
    - from the point of view of the technical measures adopted
  - verifying the compliance of the corrective actions implemented to comply with the requirements/recommendations issued following previous inspections

General objectives of inspections-2

- The inspector's assessment of the various elements of the SMS must be prepared taking into account certain aspects common to all elements that allow for a complete and objective judgment.
- The aspects to be considered are:
  1. Level of coding, correctness, completeness, and traceability of documentation (document analysis);
  2. Level of understanding of actions, compliance with hierarchies, responsibilities, and procedures (verification of responsibilities);
  3. Level of staff involvement and sensitivity to safety issues (staff involvement);
  4. Level of implementation and effectiveness of the SMS

Instruments to support the inspector-1

- For the purposes of carrying out inspections, formats have been created to assist inspectors during their control activities:
  - the operational experience analysis sheets, based on the recording of events that have occurred at their own plant and in similar plants and facilities, preferably over the last 10 years in the case of a first inspection, or since the last inspection carried out
  - the checklist, structured according to the elements of the SMS, as described in Annex III of the Directive
  - the summary table "Incidental events - measures taken" for the verification of checks and maintenance on critical equipment

Instruments to support the inspector-2

- Sent before the beginning of the inspection and to be filled by the Site manager or HSE staff

Incidental events: analysis of managerial and technical factors

Rif. n.	Date	Title .....
Brief technical description of the event (**with particular reference to technical and managerial causes**) *Seal rupture on flanged body. PEI activated due to strong smell of ammonia in the plant.*		
Critical technical systems (1): **Flanged bodies of the ammonia line - gaskets**		

SMS Element (2)	Description	Actions taken	Actions planned/programmed
Example 3.iii: plant adjustments to reduce risks	*Breakage of a gasket on a flanged body - unsuitable material*	*PEI activation Leak intercepted* *Seal replacement Splash guard protection inserted*	*Inspection/verification of gaskets on corrosive lines. Program launched to replace seals on ammonia lines with others made of suitable material (PTFE).*

1 Specify whether the event involved hardware components (equipment, control system, etc.) identified as critical for the purposes of the SGS-PIR. Where necessary, also report any need to update or modify the management of the component itself in terms of maintenance frequency or the choice of the component itself.

2 Identify, with reference to the numbering of the points in the checklists in Appendix 2 of this annex, the management factors (documentation, education, training, etc.) that were found to be lacking, i.e., not fully implemented or not appropriate to the reality of the establishment.

Instruments to support the inspector-3

Table of incidental events – measures taken

Incidental events assumed in the Safety Report (*)	**Measures taken**			
	to prevent the expected event		to mitigate the expected event	to follow the evolution of the expected event
	Technical systems	Organizational and management systems	Means of intervention in case of emergency	Systems designed to collect elements/data useful for reconstructing the event(**)
E.g.: Breakage of filling hose				

Note

(*) Scenarios characterized by low frequencies of occurrence must also be included, where these are the result of the adoption of specific measures and prevention systems that could nevertheless malfunction.

(**) Specify whether, for the accident scenario analysed, the use of instruments or other systems is expected that would allow the types and quantities of hazardous substances involved in the event to be assessed (e.g., DCS, PLC systems, cameras, weather stations, hazardous substance detectors, etc.).

Instruments to support the inspector-4

Check list 3.a for manufacturing, processes and blending

Managing Officer		Audit
Ref. Docum. SGS	NOTES	Outcome[a]

- the acquired operating experience;
- the trend of performance indicators identified.

- Verify that acquisition, updating, diffusion and storage of information on the regulatory evolution about design, construction, conduction and maintenance of the installations, and the evolution of the state-of-the-art on the field of plants, safety and corporate organization, are followed-up subjected .

4. Operational control

i	**Identification of installations and equipment subjected to checking plans**

- Verify that the criteria adopted to identify the critical elements of the plant has taken into account the risks assessment and the real situation of the establishment.
- Verify that the Operator has systematically identified the critical components based on the criteria adopted.
- Verify that the critical elements identified are included into the regular plans of maintenance, inspection and check, in relationship to their reliability, as assumed in the risk assessment, namely the life cycle or failure rates of the component, specified by the supplier or established based on the operation experience, and the results of previous checks.
- Verify, sample-wise, the coherence with the assumption taken as a reference in the safety report (upper tier) or in the risk assessment (lower tier) concerning in particular reliability, availability and the possibility of maintenance/mantainability.
- Verify that there is a clear plan for monitoring and controlling of risks associated with aging (corrosion, erosion, fatigue, creep) of equipment and systems that can lead to the loss of containment of hazardous substances, including the necessary corrective and preventive measures .
- Verify that the plans are drawn up in the face of technical specifications and rules clearly identified and updated and implemented through procedures of the safety management system in which such elements are found as:
  - assignment of roles, tasks and responsibilities about the

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Grazie