

Annex 1 to Meeting Notes: Answers to Questions for Inspection Breakout Session

TWG2 Meeting, Helsinki, June 2013

Final draft – Oct 2013

1. The definition of “inspection” in article 3(19) is very wide. How will member states use that definition when organising a system of inspection as required by Article 20(1)?

The definition lists all the tools that can constitute an inspection. There is flexibility in how the authorities combine these tools to define the set of interventions that define an inspection. The only limitation would come from national legislation.

2. Article 20(2) of Seveso III requires that inspections shall be appropriate to the type of establishment concerned.

(a) What do you understand “type of establishment” to mean?

Type of establishment should be defined based on the activity of the company, for example, NACE categories could be used. This is consistent with existing good practice.

(b) Should similar establishments be grouped together in “types”, and if so what criteria should be used?

Grouping establishments by “type” or other criteria is consistent with existing good practice. Other commonalities may also be foreseen for grouping purposes, e.g., type of substance, size of operation, location of operation (population density, distance from natural resources). These groupings could also then be used to identify internal risk-based, guidelines for inspections, courses/training requirements per sector, etc.

(c) What factors should be taken into account when deciding what type of inspection is appropriate for a particular type of establishment?

The most common factors would be regulatory tier (upper or lower), complexity of activity and where the establishment is located. Previous site history, investigations, accidents, enforcement and prosecution record, and previous inspection results will also influence the inspection strategy. It is also relevant as to whether it is a routine inspection, a first inspection or a follow up or a post-accident inspection.

3. Article 20(3) requires that all establishments are covered by an inspection plan at national, regional or local level which includes a number of elements (paragraphs (a) to (h)).

(a) What should be the purpose of the “plan” in the context of Article 20(3)?

Establishing inspection plan elements is already good practice though it may fall under different headings in different authorities. The plan should serve to establish inspection priorities but how broadly or narrowly these priorities are defined depends on the inspection strategy, national policy and context. Current practices generally have a range of planning elements that vary from country to country. An interesting topic of exchange could be on the type of elements

that define each country's inspection approach and the level of detail associated with inspection plans in various countries.

(b) How will member states decide whether plans should be at national, regional or local level and what does "local" mean in practice?

This is defined already by Member State legislation and existing structure that allocates different responsibilities to different levels of government. The implementation of national vs. regional vs. local plans depends on which authorities are involved in inspections and how they are organized in the country. Since most countries have formal inspection planning, these decisions have actually been already taken some time ago.

(c) How can member states ensure consistency if plans are prepared at the regional or local level?

Concerning the assurance of consistency, this is more an issue for those who have authorities with regional and local independence. A number of good practices exist that could be used to ensuring consistency within the country, e.g., co-ordinating committees, inspector meetings, good practice exchange workshops, and monitoring and review groups. Checking consistency through surveys or other verification measures periodically might also be a good practice. The practices suggested in question 8 and the attached summary of the half-day workshop on co-ordination (June 2011) may also apply.

4. Article 20(4) requires competent authorities to draw up programmes for routine inspections for all establishments, based on the inspection plans referred to in Article 20(3), including the frequency of site visits for different types of establishments.

(a) How will competent authorities use the inspection plans referred to in Article 20(3) to draw up inspection programmes?

The inspection Programme is the practical implementation of the overall plan.

(b) What do you understand "type of establishment" to mean, e.g., does it have the same meaning as in Article 20(2)?

Yes.

(c) If a competent authority decides not to establish inspection programmes based on the timescales set out in the second paragraph of Article 20(4) what should they take account of when making a systematic appraisal of major accident hazards of the establishments concerned?

The appraisal system should be defensible, justifiable and documented.

(d) How will this approach differ (if at all) from the approach currently adopted?

It is not different.

5. The final paragraph of Article 20(5) requires the relevant findings of inspections carried out under other Union legislation to be taken into account.

(a) How might competent authorities put in place the practical measures necessary to achieve this?

This is consistent with existing good practice (also to link with relevant legislation). Co-ordination measures that are in practice among Seveso competent authorities should already address these measures or can be easily aligned with this requirement. The answer to question 8 is also related to this question.

(b) What other Union legislation might fall into this category?

The Industrial Emissions Directive 2010, ATEX, pressure equipment, civil protection, or occupational health & safety legislation. Appropriate linkage is dependent on the national transposition of these directives and must be logical and consistent with national implementation strategy

6. Article 20(7) requires the conclusions of an inspection to be communicated by the Competent Authority to an operator within four months after each inspection. It further requires the Competent Authority to ensure that the operator takes all necessary actions within a reasonable period after the receipt of the communication.

(a) Given the wide definition of “inspection” how will competent authorities define when an inspection has been completed? (E.g. does a single site visit constitute an inspection, or where a series of visits to close out a topic are required, will competent authorities deem that an inspection is not complete until a topic is closed out)?

The entire inspection should be considered as the time frame between when inspection ends and enforcement begins. There may be differences in how countries define this period, e.g., when enforcement begins, but this difference does not seem to interfere with the ability to communicate conclusions within 4 months.

(b) How will competent authorities ensure that the conclusions from an inspection are communicated to an operator within four months? (How can the target be achieved? For this purpose, how is the term “inspection” to be defined)?

This deadline is already consistent with good practice

(c) How will competent authorities determine what is a “reasonable time” for operators to take all necessary actions following receipt of a communication after an inspection?

Inspection programmes approach this systematically already and normally establish specific time frame for follow-up. Any deviations need to be justified.

7. Article 20(8) requires an additional inspection to be carried out within six months if an inspection has identified an important case of non-compliance.

(a) How will competent authorities define what is an “important case of non-compliance”?

This is consistent with good practice in which an authority routinely identifies sites where compliance failures indicate a need for more frequent follow-up.

(b) In some instances corrective action will take longer than six months. How should competent authorities deal with those circumstances? (E.g. , what is the purpose of such an additional inspection and what form should it take)?

An important case of non-compliance usually would not be defined on the basis of one particular compliance failure but would reflect an overall concern about site safety based on a number of deficiencies that make the site a potentially serious risk, requiring close monitoring until the relevant concerns are addressed.

8. Article 20(9) requires that, where possible, inspections under Seveso III be coordinated, and where appropriate combined, with inspections under other Union legislation.

What arrangements might competent authorities put in place to ensure that this objective is achieved?

In many countries co-ordination with other agencies is standard good practice. From these countries various good practices have been established and these good practices, cited below, could be adopted by other countries, depending on what best suits the national implementation strategy.

- Establishing a Memorandum of Understanding or co-ordinating committee between associated authorities
- Combined inspection under the Seveso Directive. Some countries use joint inspection with Environmental Agency/Department, Fire Brigades etc. Some member states do not have joint inspection but would facilitate information exchange. verification of compliance by other activities Use of National/ Regional Legislation or regulations to include cooperation for environmental, occupational, Seveso etc, between other agencies/departments up to Member States. Combined inspection can focus topic areas to be inspected but they may require some inspection follow up by an individual authority on particular topics. Combined inspections however maybe difficult and even disadvantageous if there is not adequate time for indepth review.
- Joint projects such as joint development of guidelines and checklists, thematic inspections, etc.

For a fuller vision of co-ordination practices that could be adopted, the outcome of the half-day workshop held in 2011 on co-ordination is attached to these answers (Annex 1 of the TWG 2011 Meeting Notes).

9. Article 20(10) requires member states to encourage competent authorities to provide mechanisms and tools for exchanging experience and consolidating knowledge, and to participate in such mechanisms at Union level where appropriate.

What types mechanisms and tools might competent authorities be able to provide to achieve this objective?

This is consistent with good practice. As noted in previous answers, a number of good practices

have already been established at both national and EU level. At national level these can include co-ordinating committees, joint inspections, inspector exchange workshops, regular meetings between authorities, joint inspections, joint inspection reports, and joint development of guidelines.

At EU level there are already numerous opportunities for exchange through EU sponsored activities, most notably the TWG 2, the MJV programme of workshops, publication of MJV expert conclusions, lessons learned analyses, and the eMARS accident reports. In the past the Seveso inspections website was also a useful tool for information exchange. It is expected that the new MINERVA portal will again give the EU level an online space for active and ongoing exchange of information for inspectors and other Seveso stakeholders.

10. What practical links, if any, will competent authorities make between safety report assessment and inspection. What practical differences, if any, will there be between existing arrangements under Seveso II and those under Seveso III?

There is no substantial difference between Seveso II and III except for some additional precision of elements that should be considered in Annex II, item 4 and which can easily be assumed into current practice, if they are not considered already. Information exchange on various aspects of implementation of Annex II elements continues to be interesting for Member State information exchange.

11. Article 19, dealing with prohibition of use, requires that member states take into account serious failures to take the necessary actions identified in an inspection report when considering whether prohibition is necessary. How should member states implement this requirement and will this require any change from current practice?

This is already consistent with good practice. It is normally a part of national legislation where powers have been assigned to prohibit operation of an entire establishment, an activity or part of an activity, or a piece of equipment. Procedures also exist for documenting non-compliance in the inspection report, issuing a noncompliance notification and appropriate follow-up actions, which if ignored, may result in a notice of intent to shut down, etc... Most member states noted that this requirement does not require any substantive change to national legislation.

Annex 1 to the TWG 2 Meeting Notes 18-20 May 2011

Summary of TWG 2 In-Meeting Workshop on Co-ordination on Seveso Inspections

18 May 2011

Final - 20

The following tables and lists summarise the information shared at the in-meeting workshop on Co-ordination between authorities on Seveso Inspections that took place inside the annual meeting of the Technical Working Group on Seveso Inspections (TWG 2) in Tønsberg, Norway on 18 May 2011

Table 1: Background information from Presenters

Country	Joint Inspections?	Comments
Austria	No, see comment	There is no co-ordination between authorities on inspections because there is only one competent authority (district or regional level) for Seveso inspections for each site. However, the CA may need to co-ordinate with technical experts who the authority has designated for supporting certain technical aspects of inspections. Seveso inspections are part of the overall environmental inspections function and there is a special unit at regional level for environmental inspections that is in charge of overall inspections co-ordination, planning and reporting for enforcement of environmental regulations. The Occupational Health Authority also has their own inspections and while they are not a Seveso competent authority, a joint inspection with the OHA and the Seveso authority is sometimes arranged.
Belgium	Yes	Inspections are usually joint inspections involving both the national labour safety inspectorate (FSP Employment) and the regional environment authority. In particular, joint inspections are the normal way of conducting inspections in the Flemish and Brussels region (more than 90% of the Seveso inspections are joint inspections). There is no formal obligation to inspect jointly. Inspection authorities can agree on separate inspections and for various reasons (more often practical, e.g., availability of inspectors), a separate inspection is conducted on the same site.. For a few companies also the explosives inspection authority is involved. FSP Employment takes the lead in co-ordination of inspections.
Croatia	Yes	There is an overall agreement on co-ordination of inspections involving: <ul style="list-style-type: none"> ▪ Ministry of Environmental Protection, Physical Planning and Construction, ▪ Ministry of Culture ▪ Ministry of the Sea, Transport and Infrastructure ▪ Ministry of Regional Development, Forestry and Water Management ▪ Ministry of Agriculture, Fisheries and Rural Development ▪ Ministry of the Interior ▪ Ministry of Health and Social Welfare, ▪ State Inspectorate National inspection plan is co-ordinated between all the CAs. No one authority takes the lead.
Czech Republic	Yes.	Integrated inspection is a legal requirement. Authorities involved in Seveso inspection: <p>Czech Environmental Inspection Regional Authority State Labour Inspection Office Czech Mining Authority Regional Hygiene Service Fire rescue brigades</p> The Czech Environmental Inspectorate takes the lead.

Denmark	Yes	<p>Authorities involved in Seveso inspection:</p> <ul style="list-style-type: none"> ▪ Working environment (national) ▪ Emergency and fire (municipal) ▪ Environment (national or municipal) <p>The Environment Authority is responsible for co-ordination.</p>
Finland	Yes	<p>The involved authorities are:</p> <ul style="list-style-type: none"> ▪ Tukes (the Finnish Safety and Chemicals Agency) ▪ Regional Environmental Authorities, Emergency and Rescue Services ▪ Regional Occupational Health Authorities <p>Tukes takes the lead.</p>
Germany	Yes	<p>The authorities involved are:</p> <ul style="list-style-type: none"> ▪ Emissions control ▪ Water treatment ▪ Occupational Health- and Safety ▪ Fire Prevention <p>The Emissions Control authority takes the lead.</p>
Ireland	No	<p>There is only one competent authority for Seveso inspections – the Health and Safety Authority (HSA)</p> <p>Although they are uncommon, joint inspections are possible under the MOoU with the Environmental Protection Agency, the HSA may appoint an inspector of the EPA to be an inspector of the HSA to provide technical assistance in doing major accident investigation and report writing.</p>
The Netherlands		<p>The authorities involved are the:</p> <ul style="list-style-type: none"> ▪ Directorate Major Hazards Control (MHC) of the Dutch Labour Inspectorate ▪ Regional Environmental Licensing Authorities (RELA) ▪ Regional Fire Brigades (RFA) ▪ Surface Water Quality Authorities (national authority), advisor to RELA <p>Either MHC, RELA and RFA will take the lead on an inspection, generally with resulting in each authority leading 1/3 of the inspections.</p>
Norway	Yes, but not very many	<p>The authorities involved in Seveso inspections are:</p> <ul style="list-style-type: none"> ▪ Directorate for Civil Protection and Emergency Planning – DSB (Coordinating Authority). Fire brigades invited to join DSB in their inspections ▪ Climate and Pollution Agency ▪ Norwegian Labour Inspection Authority ▪ The Petroleum Safety Authority Norway ▪ Norwegian Industrial Safety and Security Organization <p>If there is a joint inspection, one of the involved authorities takes the lead.</p>
Portugal	No	<p>The Environment Inspectorate General is the only competent authority for Seveso inspections.</p>
Sweden	Yes..	<p>The following authorities are involved in Seveso inspections:</p> <ul style="list-style-type: none"> • Environmental inspectors, regional (The County Administrative Boards) • Occupational safety inspectors, regional (Swedish Work Environment Agency) • Emergency Response, local (Municipalities) • Environmental inspectors, local (Municipality) <p>No authority takes the lead. At an actual inspections, one authority (normally according to a rotating schedule) act as chair.</p>
Turkey	See comments	<p>A new bylaw covering Seveso inspections was made official in 2010. The Ministry of Environment and Forestry (MOEF) and the Ministry of Labour (MOL) are the responsible authorities for Seveso implementation. Inspections may be conducted by both the MOEF and MOL but there is no experience in co-ordination yet. At the moment, the notification obligation is now in force. So far 494 establishments have been identified as covered under Seveso. Inspections are targeted to become effective in August 2012.</p>
United Kingdom	Yes	<p>The involved authorities are:</p> <ul style="list-style-type: none"> ▪ Health and Safety Executive and Environment Agency in England and Wales ▪ Health and safety Executive and Scottish Environment protection Agency in Scotland <p>On administrative arrangements, the HSE takes the lead. However, for all other aspects of Seveso inspections the authorities act as one competent authority.</p>
DE, SE (sometimes), A, NL, UK, HR, NO (sometimes), CZ	BE, FI, P	<p>BE: Each authority sends its own report. There is consultation on content between inspectors.</p>

Table 2: Is there a joint inspection report?

Yes	No	Comments
DE, SE (sometimes), A, NL, UK, HR, NO (sometimes), CZ	BE, FI, P	BE: Each authority sends its own report. There is consultation on content between inspectors.

Table 3: Time estimates for joint inspection co-ordination and report preparation – p. 1 of 2

Time Period	How much time does joint planning and the inspection itself take take? ¹	What is a typical time frame for completing an inspection report from a joint inspection? ¹	Typical time frame for delivery of the joint report to the operator ²
≤ 1 day	<p>BE: Inspection planning: 1 man day per year per inspector. Extra time for coordination on reporting (e-mail, phone)</p> <p>FI: 1 hour (for TUKES) for co-ordination</p> <p>UK: Nominal for co-ord but time is required for joint planning (UK)</p> <p>CZ: 3 % of time (CZ)</p> <p>SE: Inspection co-ordination takes 1 day/year and up to 1 day/inspection</p>	<p>BE: Reports - From 1 hour up to 1 day per inspection</p> <p>FI: 1 day for report</p> <p>SE: takes 1 day of work and about 3 weeks after the site visit to finalize</p>	SE: Takes about 3-6 weeks to be finalized and sent back to the operator (estimation)
A few days but ≤ 1 week	<p>A: Timeframe for coordination is 2 days or one week, depending on how many authorities are involved in the inspection</p> <p>NL: 90 hours for co-ordination + on-site inspection + report³</p> <p>P: There is no joint inspection. 2 days are typically needed for planning and conducting an inspection.</p> <p>NO: Co-ordinated inspection usually takes 2 – 5 days depending on the scope and size of the establishmen</p>	<p>DK: Time needed to complete report: 15-20 hours</p> <p>UK: 0.5 to 6-8 days P: 4 days report</p> <p>P: There is no joint report, but writing an inspection report typically takes about 4 days</p>	
1-2 Weeks	HR: An annual plan of inspection is prepared in co-ordinated with all the competent authorities. Preparing for an inspection is ~ 1 week. On-site inspect 3-5 days.	<p>NL: 2-3 days per inspector (3 in case of an enforcement action)</p> <p>A: 1-2 weeks for joint report</p> <p>HR: Joint report – 1 week is target, but more realistically 2-3 weeks</p>	

¹ Except when otherwise specified, this column refers to actual time invested to produce the report not the time lapse between when the inspection takes place and when it is sent back to the operator.

² This information was not requested but we have noted the information when it was provided in the presentation.

³ Editor's. note: Subtracting reporting time (in the next column) one can estimate that preparation time is ~< 1 week>

Table 3 – p 2 of 2

Time Period	How much time does joint planning and the inspection itself take take?1	What is a typical time frame for completing an inspection report from a joint inspection?4	Typical time frame for delivery of the joint report to the operator5
3-4 Weeks/ Month	DE: Timeframe only for coordination: 2-30 days. It depends on the number of authorities (DE)		DE: Joint inspection report (1 month) DK: Joint inspection report should be completed within 2-3 weeks CZ: Delivery of final report is 30 days after inspection – legal requirement
1-2 Months			NL: Delivered in 6 weeks NO: Maximum 6 weeks by regulation
> 2 Months			BE: Average: 2 – 3 months between inspection and report
Other	A: About 25% of the joint inspection process [planning + on-site + report] is co-ordination DK: 50% of time per inspection used for co-ordination (DK) NO: Co-ordinatino time for Inspections varies with scope		

⁴ Except when otherwise specified, this column refers to actual time invested to produce the report not the time lapse between when the inspection takes place and when it is sent back to the operator.

⁵ This information was not requested but we have noted the information when it was provided in the presentation.

Table 4: Mechanisms Used in Seveso Countries to Co-ordinate Between Authorities p. 1 of 2

Mechanism	Countries	Comments
National co-ordination committee	SE, NL, UK, HR (informally), P, NO, CZ, BE	<p>A: Sometimes in regions there is inspector co-ordination</p> <p>UK: Strategic management group and also a business support group to support operators. Informal co-ordination especially on inspection planning & strategy</p> <p>SE: We have in some respect a national co-ordination committee, but it could be developed further. What we do have is co-operation meetings on the national level 3-4 times/year. At these meetings we discuss eg. Policy questions, inspection guidance and competence development.</p>
Common inspection guidance for all authorities	BE, A, NL, UK, NO	<p>A: Published by the National Seveso expert group (inspectors from all regions and big cities)</p> <p>CZ: Each inspector carries out inspections in the framework of their own competences</p>
Joint inspections with one or more authority (almost always)	DE, BE, SE, A, DK, NL, FI (sometimes), UK, HR, NO (sometimes), CZ (always)	<p>A: Sometimes with the occupational health inspectorate</p> <p>DK: We do them, but not always</p> <p>NL: Minimum of 2 competent authorities participate in the inspection, normally all 3 authorities in 80% of inspections</p> <p>NO: Authorities may also focus on common themes for the same site but inspect the site separately</p> <p>SE: The inspections are almost always common between the three above mentioned authorities but sometimes the local authorities are not present. They also do not take such an active part in the planning of the inspections.</p>
Joint checklists used by all authorities (all)	BE, DE, SE, NL, UK, NO (see note)	<p>BE: Questionnaires (called "Seveso Inspection Tools") are developed jointly by the inspection authorities (in working groups with inspectors from different authorities). The Seveso Inspection Tools are published as a document from the "Belgian Seveso Inspection Authorities"</p> <p>NL: They are not checklists, but issues for attention used in combination with inspectors' knowledge & experience</p> <p>UK: Joint "delivery" guides have been developed on priority topics = similar to NL and also sequential guidance</p> <p>NO: Common question list</p> <p>CZ: Each authority carries out inspections in the framework of their own competences</p> <p>SE: Common question lists are often used for common questions but they are not (yet) fully harmonized between all authorities. Each inspector therefore also carry out the inspection in the framework of his/her own competence.</p>
Joint database for tracking and reporting on establishment inspections	SE, NL, UK, NO, CZ, A (see note)	<p>A: Not on federal level, partly on regional level</p> <p>UK: Not yet accessible outside HSE but hoping that they will be in the next few months</p> <p>SE: We have a joint database where we can report about to which extent the establishments fulfil their requirements. It is however not a tool for reporting of which specific issues or deficiencies each establishment has to correct.</p>

Table 4 – p. 2

Mechanism	Countries	Comments
Joint annual strategy for planning inspections	BE, DE, A, DK, NL, UK, HR, P, NO, CZ	A: At regional level with Occupational Health Authority
Joint annual conference or workshop on Seveso for all authorities	BE, SE, A, NL, HR (see note), NO, CZ	<p>HR: yes, for inspectors, but not specifically for Seveso</p> <p>SE: We have a joint annual conference on Seveso for all authorities. It is addressing both industry, authorities, consultants and academia. We have not directly addressed the municipalities yet since their parts of the implemented Seveso II directive slightly differs from the other parts and there are more other conferences open for them.</p>
Other	BE, DE, SE, DK, NL, FI, UK, IRL	<p>BE: For each Seveso company an inspection programme is jointly established by the inspectors from the different authorities involved. This coordination functions at the operator level.</p> <p>SE: Joint campaigns for special topics eg. a harmonization inspection campaign once a year. Then the authorities come together to inspect in mixed groups and to discuss the common enforcement standards.</p> <p>DE: Classification of sites at regional level</p> <p>DK: Individual inspection programme for a site</p> <p>NL: Co-ord meetings at reg level, exchange of knowledge and experience at reg level (workshops, seminars), improvement programmes for execution of Sev inspections, national and reg monitoring of (reg) annual inspection programmes</p> <p>FI: Tukes invites reps from other authors to inspection. They do not always attend, but if not, they can give their opinions</p> <p>IRL: Common inspection guidance, checklists and database used internally.</p> <p>UK : Frequent local liaison contact. Strategic topics also identified and described by management</p>

SUCCESES AND AREAS FOR IMPROVEMENT

SUCCESES

AUTHORITY, CONSISTENCY, REDUCED CONFLICT

- **Joint team has more authority (BE)**
- **Conflicting points of view between authorities are better managed and dealt with, and kept within the authorities (BE, DK)**
- **Despite the federal system, co-operation and co-ordination of regulatory inspection bodies functions well (A)**
- **The authorities act as one (DK)**
- **Integrated government arrangements (UK)**
- **Jointly agreed inspection plans (UK)**
- **Reports are sent to all Competent Authorities (Environmental Protection Agency and the Civil Protection Agency)**
- **Positive for establishments to have one contact point regarding correspondence. On safety reports, ensures equal treatment**
- **Joint national regulation**
- **10 years of co-operation (but some details of co-operation merit a review (CZ)**
- **Memorandum of Understanding (MoU) with the Environmental Protection Agency (EPA) – e.g., on new sites (but not on inspections) (IRE)**
- **Communication with local competent authorities re: emergency planning (but not inspections) (IRE)**

EFFICIENCY

- **Time saving – all authorities conduct the inspection at the same time (DE)**
- **For authorities, there is a fixed co-ordination period (DE)**
- **Informality of co-ordination in Finland is a strength; it is not bureaucratic (FI)**
- **The voluntary nature of the arrangements means that only interested parties attend (FI)**
- **Co-ordination is not very time consuming (FI)**
- **Sometimes co-ordination but not always joint inspections can be more efficient (e.g., like Norway)**

COMPETENCY & RESOURCES

- **Inspectors gain expert knowledge of different authorities (DE, NL)**
- **Increased quality (SE)**
- **More than one authority allows a better overlap of knowledge of specific sites when one of the inspectors changes – assures continuity (SE)**
- **Increased efficiency (mainly for industry) (SE) (also for authorities) (DK) Should maybe be placed under “Efficiency”**
- **Development and use of “federal” checklists (A)**
- **Common assessment/enforcement policies (NL)**
- **Interdisciplinary approach (HR)**
- **Analysis by the Environmental Ministry (P)**

- Good long-term planning. Makes it easier to ensure that obligations are fulfilled (NO)
- Authorities learn to know each other well (NO)
- Joint training (CZ)

IMPROVED REPORTING

- Better conclusions, more strategic (NL)

IMPROVED ENFORCEMENT

- Better and co-ordinated enforcement, but the individual basis for enforcement still differs between authorities due to legal restrictions (enforcement provisions are different). Often Labour tends to lead inspectorate enforcement action so that site deals only with one authority (NL)
- Inspecting safety and environment protection as a whole (HR)

AREAS FOR IMPROVEMENT

EFFICIENCY, ETC.

- inspection reporting (BE)
 - Needs to be faster (BE)
- Sometimes focal points overlap with authorities

LESS CONFLICT, MORE CONSISTENCY

It would be desirable to have:

- More identical reports (if not unique) (BE) and
- Co-ordination with local/regional environmental inspections (SE)
- Ensuring joint decision-making (UK)
- Greater consistency in evaluation of safety reports (NO)
- It is noted that lack of participation by other authorities may sometimes disappoint operators (FI)

COMPETENCY & RESOURCES

Need improvement:

- in internal (peer) coaching & review (BE)
- in necessary competency and experience among all the inspectors (DK)
- to promote common knowledge and inspection support methods (SE)
- in assuring necessary resources and equal priority between authorities on the same site (DK)
- the amount of inspection resources - Sharing the effort (BE, UK, NO)
- in exchange of knowledge & experience between competent authorities

- in knowledge about Seveso requirements (projects, manuals, checklists) (HR)
- to establish joint procedures (P)

MORE CO-ORDINATION

There is still a need for:

- Co-ordination with adjacent or related laws (SE)
- Exchange of inspectors especially across regions (A)
- Co-ordination between the authorities themselves at an official level even though co-ordination between experts in the authorities is good (A)
- Identification by authorities of common Seveso benefits (DK)
- Co-ordination of long term inspection programmes (DK)
- Combined and stronger enforcement (NL)
- More organized seminars on knowledge exchange (NL)
- Making joint prioritisation in inspections (HR)
- An increase in Task Force meetings (P)
- Implementation of joint inspections (P)
- Effective communication and specification of co-operation (CZ)

SPECIFIC TASKS

Some additional needs include:

- Co-ordination on accident investigations (NL, HR)
- An SMS approach to inspections instead of just a technical approach (HR)
- More joint training of inspectors – on evaluation of SRs, evaluation of findings in inspections (improvement points, important observations) (NO)
- Improvement of joint inspection report (CZ)
- Consistency of hazard ranking and performance rating (UK)