

Economic Commission for Europe

Convention on the Transboundary Effects of Industrial Accidents

Capacity-building activity within the Assistance Programme

Report of the training session on on-site inspection of hazardous industrial sites for Croatia, Serbia and the former Yugoslav Republic of Macedonia

I Introduction

1. The training session on on-site inspection of hazardous industrial sites for Croatia, Serbia and the former Yugoslav Republic of Macedonia was held in Split, Croatia, on 22–24 October 2012. It was organized within the framework of the implementation phase of the Assistance Programme for the countries of Eastern Europe, Caucasus and Central Asia and South-Eastern Europe, under the United Nations Economic Commission for Europe (UNECE) Convention on the Transboundary Effects of Industrial Accidents. The training session was funded by the Environment and Security Initiative (ENVSEC) programme. The training session also benefitted from the in-kind contributions of the Joint Research Centre of the European Commission, Denmark and the United Kingdom (UK).
2. The Ministry of Environmental and Nature Protection of Croatia organized the training session.

II Objective

3. The main objective of the training session was to develop further in the three project countries a national system for the prevention of major industrial accidents and in particular to:
 - (a) Present the current situation in each of the three project countries and highlight the shortcomings identified the previous two projects,¹ after the self-assessments carried out, and present actions undertaken;
 - (b) Improve the knowledge of the inspectors about inspections of hazardous industrial sites, in cooperation with other authorities;
 - (c) Learn good practices on the organization of integrated inspections, with particular attention to: which authorities are involved in inspections; the rights and duties of inspectors; at which level and how the coordination between authorities in a country is carried out.

III Participation

4. The training session was organized for experts from various authorities involved in inspections to hazardous industrial sites in the three project

¹ Training session on evaluation of safety reports (Belgrade, 8–9 February 2010) and training session on on-site inspections for Croatia, Serbia and the former Yugoslav Republic of Macedonia (Zagreb, 29–31 March 2011).

countries. Each country nominated up to 10 participants. Participants from Croatia represented the following authorities: the Ministry of Environmental and Nature Protection; and the National Protection and Rescue Directorate (both authorities represented by the inspectorates). Authorities from the former Yugoslav Republic of Macedonia represented: the Ministry of Environment and Physical Planning; the Ministry of Labour and Social Policy; and the Directorate for Protection and Rescue (all three authorities were also represented by the respective inspectorates). From Serbia, the authorities represented were: the Ministry of Energy, Development and Environmental Protection; and the Ministry of Interior-Sector for Emergency Situations, Directorate for Prevention and Directorate for Risk Management (the inspectorates of both ministries were also represented in the training session). While the majority of participants were inspectors, representatives of policy-making departments also took part in the training. The training session was supported by international experts, Mr. Ron Evans, Mr. Klaus Hougaard (Denmark), Ms. Sandra Ashcroft (UK), Ms. Zsuzsanna Gyenes (Joint Research Centre of the European Commission) and by a member of the secretariat.

IV Opening, welcome address

5. Mr. Hrvoje Buljan, Chief of the International Cooperation Department of the Ministry of Emergency Situations and Chair of the meeting, welcomed the participants and opened the national training session.
6. The representative of the secretariat of the UNECE Convention also welcomed the participants on behalf of the UNECE and thanked the Croatian organizers. She reminded participants of the previous phases of the project and described the focus of the current training session.

V Programme

7. The programme of the training session was divided in three days. The highlight was the simulated inspection of an oil storage facility on the second day. The first day was devoted to hearing good practices and, on that basis, to preparing for the simulated inspection. The third day was used to wrap up and to set the way forward. More precisely, the outcome of the three days was as follows:

First day of the meeting

8. Each of the three project countries presented the situation, improvements and gaps following actions taken after the previous two training sessions carried out with the same countries. The main elements that were highlighted in the three presentations were:

- (a) The activities under the Assistance Programme strongly contributed to reaching a better understanding between the administrations of the three countries;
- (b) The tasks concerning the assessment of safety reports were clearer and this allowed for a more clear division of work among the authorities in the same country, and so eased the flow of information;
- (c) The three countries were well aware that the work was still ongoing in the respective countries, and that a lot needed to be done in the period between the training sessions;

(d) Among the tangible outcomes of the previous phases of the project, there was the preparation of bylaws in order to enhance the implementation of relevant legislation already approved in the countries. The countries also prepared guidelines and other similar documents for operators and inspectors;

(e) The three countries were at different stages concerning the collection of safety reports and their assessments. Croatia and Serbia had already received the safety reports. While Croatia had already issued authorizations following the assessment of safety reports, Serbia had started to assess them but had not yet provided feedback. The former Yugoslav Republic of Macedonia was starting to amend its legislation to prepare the first round of safety reporting;

(f) Among the elements to be improved were the domestic coordination among the competent authorities and the availability of personnel.

9. All three countries reported having found synergies between the training and other activities under the Assistance Programme, on the one hand, and training conducted in the framework of the approximation to the European Union, on the other hand.

10. Experts from Denmark and the UK then made presentations to the training participants about on-site inspections of hazardous industrial sites in their countries. The presenters were requested to cover specific elements in this topic, following the interest shown by the three countries representatives at an earlier meeting to prepare the training session. The elements on which the presenters had to focus were:

(a) Authorities involved in on-site inspections of hazardous industrial sites (for instance ordinary or regular inspections and extraordinary ones, announced and unannounced);

(b) Classification and type of inspections in the respective countries;

(c) Frequency of inspections (including ordinary or regular inspections and extraordinary ones);

(d) Rights and duties of inspectors;

(e) Difference in approach since the entry into force of the Convention and of the corresponding European Union legislation;

(f) Whether integrated inspections were carried out in their countries and, if so, how coordination between authorities was carried out and how the flow of information was organized both before and after the inspections took place.

11. The participants also heard of practical implications in the implementation of the abovementioned legislation. For instance, they became acquainted with the importance of using safety reports and of assessing them before preparing an inspection.

12. Subsequently, the representatives of the three countries provided presentations following the same scheme as the one used by the experts from Denmark and the UK.

13. The second part of the first day of the training was devoted to the planning of the simulated inspection. Under the guidance of the facilitators, the participants split into two groups and discussed possibilities for running the simulated inspection. The two groups presented their proposals in plenary and discussed the modality to be followed the next day.

Second day of the meeting: on-site inspection

14. The simulated inspection of INA Industrija Nafta in Split was conducted according to the plan agreed upon the day before. The participants could visit the two installations composing the facility.

15. At the beginning of the inspection, the participants and the facilitators were invited by the representatives of the company to listen to a brief presentation about the installation and about the preparation of the safety report.

16. The representatives of the company also informed the participants that they were planning to review the safety report that the participants had been able to read in the period before the training session. The persons responsible for the preparation of the safety report, also present at the discussion, indicated that the document had been prepared on the basis of legislation that was going to be changed. They also informed the participants that the safety report would be reformulated not only on the basis of the new legislation, but also in the light of the lessons learned in the previous training session, in which they had participated by providing access to another installation of the company.

17. The participants were then able to visit the two installations composing the facility and ask questions to the personnel. For time reasons there was no possibility to check the documentation of the company, as originally planned. Nonetheless, the participants could make a good assessment of the installations.

Third day of the meeting

18. The third day of the meeting was devoted to discussing the lessons learned from the simulated inspection and from the presentations shared on the first day, as well as the follow-up actions to be taken in the countries.

19. The morning started with group work (the same groups as in the afternoon of the first day) to prepare feedback to be shared in plenary about of the simulated inspection. The main highlights of the group work that were shared in plenary were:

(a) The experience highlighted the importance of becoming acquainted with safety reports before planning an inspection to an installation so that the inspectors would have well in advance the information about the installation and would be able to better target their visit and the questions that they would ask;

(b) For the Croatian environmental inspectorate it was an interesting visit, since the installation had not yet been visited by this authority, although an inspection had already been planned for the near future;

(c) Because the group comprised people with different competences, all of the participants could verify the installation according to their own competences and specializations (for instance some checking firefighting measures, while others were more interested in questions concerning safety management systems in a broader sense);

(d) The exchange of views between the three countries showed that cooperation between them was improving;

(e) The simulated inspection allowed the participants to learn from each other as well as from the facilitators;

(f) Not many companies would have been as open to cooperation as INA in inviting so many people from other countries to their premises.

20. Following this discussion, the participants split again into groups, this time by country, so that the representatives of each of the project countries could discuss together a national feedback on the training session and a preliminary assessment of the way forward.

21. The three countries then reported the outcome of the discussions in plenary and the following were the main outcomes.

22. The outcomes for Serbia were:

(a) A more structured cooperation with other competent authorities, particularly with the Ministry of Interior could be of help. At the time of the training there was an agreement for implementing the Convention signed by the responsible ministries. Laws and bylaws for the implementation of the Convention and of the Seveso II Directive² were adopted, but needed to be amended and the division of responsibilities needed to be clearly defined. The cooperation was mainly based on personal support between colleagues in the different ministries. This unstructured cooperation led to difficulties in scheduling integrated inspections. There should be a legal agreement between the ministries for them to cooperate and to share the information as needed. A memorandum could be signed between the different ministries involved;

(b) The Technical Commission, a working group dealing with assessment of safety reports, would need a closer link to the organization and outcomes of ordinary inspections, to have a broader view in the assessment of further safety reports for installations;

(c) The training session made the inspectors from the environmental authorities more aware that they would need to be more involved in the work of the Technical Commission in charge of assessing safety reports.

23. The outcomes for Croatia were:

(a) Croatian participants indicated that in their country the implementation of an integrated on-site inspection system was being finalized. This system would be used for industrial sites falling under the Convention and under the Seveso II Directive.

(b) Participants were of the opinion that in the future the role of local inspectorates could be strengthened;

(c) The use of the checklist elaborated in the previous training sessions could be a useful tool to design inspections, especially thematic inspections, since it would allow inspectors to focus on topics and go through them in depth;

(d) The training session allowed them to see the importance of being well prepared for an inspection. It also highlighted the importance of having good relations with the operators;

(e) They also realised that, in preparing integrated inspections, not only was it important to cooperate with other authorities before inspections, but also afterwards. For instance, preparing a joint report could be a useful tool and should be recommended;

(f) The participants were concerned in particular with avoiding operators blocking information and how to check the completeness of information while at the same time maintaining confidentiality.

24. The outcomes for the former Yugoslav Republic of Macedonia were:

² Directive on Major accidents involving dangerous substances. Council Directive 96/82/EC, as amended by Directive 2003/105/EC

(a) The participants indicated that the country's Ministry of Environment by the Law on Ratification of the Convention on the Transboundary Effects of Industrial Accidents was formally designated as the coordinating body concerning the implementation of the Convention. However, in practice three institutions shared the responsibility for industrial accidents management: the Ministry of Environment and Physical Planning in the area of prevention, the Directorate for Protection and Rescue in the area of preparedness and response, and the Centre for Crisis Management for notification;

(b) In the case of the last two authorities, a specific legal act provided the mandate for the inspectorates from the different ministries to cooperate. For the time being it did not seem that further actions would be needed for tackling this aspect;

(c) Part of the national legislation providing transposition of the Seveso Directive was adopted. Important amendments to the Law on Environment were adopted by the Macedonian Parliament. In addition, final drafts of the regulations on the content of safety reports and prevention policy were prepared. The amended Law on Environment provided the possibility to all the involved institutions to participate in the evaluation of safety reports. This approach is actually the basis for the organization of integrated inspections to hazardous installations. The training session made the inspectors from the environmental authorities more aware that they would need to be more involved in the work of the working group in charge of assessing safety reports.

25. All the participants were concerned with the assessment of the safety reports, in particular with the assessment of the Seveso Directive Major Accidents Prevention Policy (MAPP). Despite the previous training sessions it proved difficult for all of them to assess the safety reports in this regard.

Conclusions

26. Concluding the training session, the participants and the facilitators highlighted the following points:

(a) Those preparing the safety reports in INA had also learned a lot from their participation in the training and they would address the comments received in the new safety report. They also thanked the representatives from the competent authority in Croatia for the opportunity provided and also for the relationship that was not one of policing, but that is based on cooperation towards a common goal;

(b) Sharing information on a safety report before an inspection was recognised as an important element for a good outcome of the inspection. The participants also recognised that not only was it important to share the information with colleagues from the other authorities in the same country before an inspection, but also after it. This would even be more important in case the inspections were not integrated;

(c) In the light of the steps taken by the three countries since the beginning of the Assistance Programme, one of the facilitators urged the participants not to become frustrated because of progress being slower at this advanced stage. He highlighted the importance of being patient and not to rush;

(d) It was felt by all the participants that it would be useful for them to receive a safety report that competent authorities would define of good quality and where the MAPP would be described in a clear and complete way. This safety report would be used by the project countries as a model to better

understand how this crucial part should be written and to better advise the operators on how to produce a good-quality safety report.

VI Closing of the training session

27. Mr. Buljan thanked the participants and the facilitators for the excellent cooperation and active participation. He also thanked the presenters of the first day for the very good insights into the policies and legislation of Denmark and the UK.

28. The representative from the secretariat joined the representative from Croatia in thanking the participants and facilitators. She also thanked the Croatian Ministry of Environment for the very good organization and for the availability to host such a training session. She additionally thanked the INA company for opening its doors and allowing the entry of so many visitors to its premises.

29. Mr. Buljan, on behalf of the Ministry of Environment of Croatia, closed the training session.

List of participants

<i>Name and last name</i>	<i>Organization or Agency</i>	<i>Official Division or Department and Occupation</i>	<i>Contact details</i>
Hrvoje Buljan	MEPN	Sector for Environmental Impact and Industrial pollution,	+385 1 3717 178 +3851 3717 135 hrvoje.buljan@mzoip.hr
Dubravka Pajkin Tučkar	MENP, Directorate for environmental inspection	Sector Environmental Inspection Department for the inspection of authorized persons	+385 1 3717 245 Dubravka.pajkin.tuckar@mzoip.hr
Anita Milošić	MENP, Directorate for environmental inspection	Sector Environmental Inspection Department for the inspection of authorized persons	+385 1 3717 180 Anita.milosic@mzoip.hr
Vesna Cindro Ostoja	DUZS, National Protection and Rescue Directorate	Independent Service for Inspection, Protection and Rescue Inspector	+ 385 21 353 796 + 385 21 435 674 vesna.cindro@duzs.hr
Josipa Granić	DUZS, National Protection and Rescue Directorate	Independent Service for Inspection, Protection and Rescue Inspector	+385 51 352 436 josipa.granic@duzs.hr
Zdravko Barjaktarović	MENP, Directorate for environmental inspection	Directorate for inspection Sector Environmental Inspection Branch Unite Varaždin	+385 42 301 685 Zdravko.barjaktarevic@mzoip.hr
Željko Rubil	MENP, Directorate for environmental inspection	Environmental inspector	+385 35 415 125 Zeljko.rubil@mzoip.hr
David Jurić	MENP, Directorate for environmental inspection	Sector environmental Inspection Regional unit in Istru, Primorje, Gorski Kotar and Lika, Branch in Rijeka	+385 51 32 5780 David.juric@mzoip.hr
Barbara Segarić	MENP, Directorate for environmental inspection	Department of environmental inspection for Dalmatia	+385 23 309 805 Barbara.segaric@mzoip.hr
Ines Lozina	MENP, Directorate for environmental inspection	Sector environmental Inspection Regional unit in Šibenik, Branch in Dubrovnik	+385 91 187 7082 Ines.lozina@mzoip.hr
Danijela Granić	MENP,	Directorate for	+ 385 21 340 406

<i>Name and last name</i>	<i>Organization or Agency</i>	<i>Official Division or Department and Occupation</i>	<i>Contact details</i>
	Directorate for environmental inspection	inspection Sector Environmental Inspection Branch Unite Split	Daniela.granic@mzoip.hr
Ivana Kuzmanić	MENP, Directorate for environmental inspection	Directorate for inspection Sector Environmental Inspection Branch Unite Split	+ 385 21 340 406 ivana.kuzmanic@mzoip.hr
Suzana Milutinović	Ministry of Energy, Development and Environmental Protection	Senior Adviser within the Section for Chemical Accident Protection	Tel: +381 11 3121 391 Fax: +381 11 3132 574 e-mail: suzana.milutinovic@merz.gov.rs
Sanja Stamenković	Ministry of Energy, Development and Environmental Protection	Adviser within the Section for Chemical Accident Protection	Tel: +381 11 3121 391 Fax: +381 11 3132 574 e-mail: sanja.stamenkovic@merz.gov.rs
Vladimir Borota	Ministry of Energy, Development and Environmental Protection	Adviser within the Section for Chemical Accident Protection	Tel: +381 11 3121 391 Fax: +381 11 3132 574 e-mail: vladimir.borota@merz.gov.rs
Bojan Srdić	Ministry of Energy, Development and Environmental Protection	Adviser within the Section for Chemical Accident Protection	Tel: +381 11 3121 391 Fax: +381 11 3132 574 e-mail: bojan.srdic@merz.gov.rs
Dragana Bosiljčić	Ministry of Energy, Development and Environmental Protection	Head of Inspection Department for Chemicals, Biocides and Seveso Establishments	Tel: +381 11 2287 554 Fax: +381 11 2157 539 e-mail: dragana.bosiljcic@merz.gov.rs
Sladana Špan	Ministry of Energy, Development and Environmental Protection	Inspector in the Inspection Department for Chemicals, Biocides and Seveso Establishments	Tel/ Fax: +381 13 835 800 e-mail: sladjana.span@merz.gov.rs
Goran Milutinović	Ministry of Interior-Sector for Emergency Situations, Directorate for Prevention	Deputy Head of the Directorate for Prevention	Tel: +381 11 3621 932 Fax: +381 11 3006 045 e-mail: goran.milutinovic@mup.gov.rs

<i>Name and last name</i>	<i>Organization or Agency</i>	<i>Official Division or Department and Occupation</i>	<i>Contact details</i>
Slavko Mladenović	Ministry of Interior-Sector for Emergency Situations, Directorate for Risk Management	Senior Police Inspector, Head of Section	Tel: +381 11 2282 944 Fax: +381 11 2282 954 e-mail: svb@mup.gov.rs
Slaviša Banković	Ministry of Energy, Development and Environmental Protection	Inspector in the Inspection Department for Chemicals, Biocides and Seveso Establishments	Tel/Fax: +381 18 505 159 e-mail: slavisa.bankovic@merz.gov.rs
Marina Vilić	Ministry of Energy, Development and Environmental Protection	Inspector in the Inspection Department for Chemicals, Biocides and Seveso Establishments	Tel: +381 13 346 940 e-mail: marina.vilic@merz.gov.rs
Lilija Jankova	Ministry of Environment and Physical Planning/Administration for Environment	Division for Chemicals and Industrial Accidents	Tel.: ++ 389 2 3251 575 E-mail: l.jankova@moepp.gov.mk
Nevrije Rahmani	Ministry of Environment and Physical Planning/Administration for Environment	Division for Chemicals and Industrial Accidents	++ 389 2 3251 575 E-mail: n.rrahmani@moepp.gov
Darko Blinkov	Ministry of Environment and Physical Planning	State Environmental Inspectorate	Tel.: ++ 389 2 3251 550 E-mail: d.blinkov@moepp
Arifi Durak	Ministry of Environment and Physical Planning	State Environmental Inspectorate	Tel.: ++ 389 2 3251 550 E-mail: durak77@yahoo.com
Krume Kochov	Ministry of Environment and Physical Planning	State Environmental Inspectorate	Tel.: ++ 389 2 3251 550 E-mail: k.kocov@moepp.gov.mk
Trajko Todorchevski	Directorate for Protection and Rescue	Division for General Inspectorate	Tel.: ++ 389 2 3247 212 E-mail: trajko_todorchevski@yahoo
Goran Dimitrijević	Directorate for Protection and Rescue	Division for General Inspectorate	Tel.: ++ 389 2 3247 212 E-mail: gorandimitrijević@gmail
Goran Popovski	Ministry of Labor and Social Policy	State Labor Inspectorate	Tel.: ++ 389 75 402 863 E-mail: goro_popovski@yahoo

<i>Name and last name</i>	<i>Organization or Agency</i>	<i>Official Division or Department and Occupation</i>	<i>Contact details</i>
Virginia Fusé	UNECE	Secretariat to the Convention on the Transboundary Effects of Industrial Accidents	Environment Division United Nations Economic Commission for Europe Tel: +41 22 917 4149 Fax: +41 22 917 0107 e-mail: Virginia.fuse@unece.org
Zsuzsanna Gyenes	European Commission DG Joint Research Centre	IPSC - Security Technology Assessment Unit Major Accident Hazards Bureau	Tel. +39 0332.786732 Fax: +39 0332.786280 zsuzsanna.gyenes@jrc.ec.europa.eu
Sandra Ashcroft	Health and Safety Executive	Hazardous Installations Directorate - Chemical Industries Policy	(0044 (0)151 951 3531 / VPN 523 3531 Sandra.ashcroft@hse.gsi.gov.uk
Klaus Hougaard	Danish Ministry of the Environment	Environmental Protection Agency	klhou@mst.dk
Ronald Evans			Tel: 01943 865528 Mobile: 07854 276716 ronald.evans@semperoptimus.co.uk
Ivančica Krivdić	INA – OIL Industry Plc.	HSE Sector Firefighting and Emergency Response Department	Phone: ++385 91 4975 824 E-mail: ivancica.krivdic@ina.hr
Željko Benković	INA – OIL Industry Plc.	HSE Sector Firefighting and Emergency Response Department	Phone: ++385 91 4975 816 E-mail: zeljko.benkovic@ina.hr