



*Ministry of Infrastructure and the
Environment*

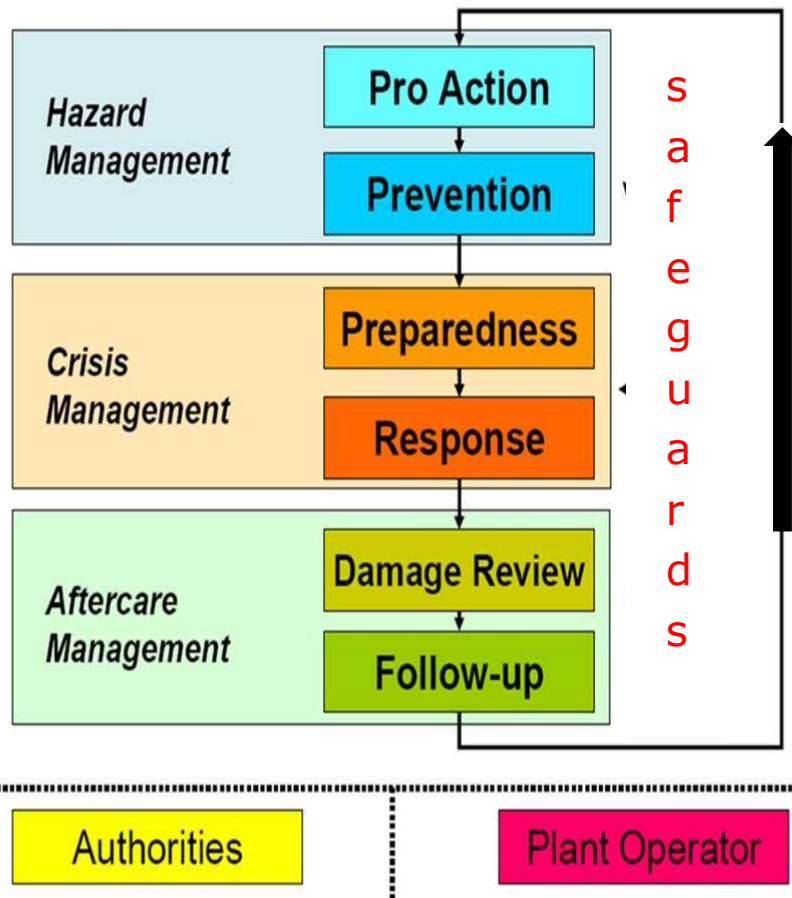
Notification in the Netherlands

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SAFETY TAKES TWO TO TANGO



- Legalisation, accident prevention policy, land-use planning, legislation.
- Risk-analysis, safety reports, permits, riskmanagementsystem, monitoring law enforcement.
- Emergency planning, contingency planning. Operational guidelines. Training and exercise
- Emergency actions, action guidelines and crisis communication to the public.
- Evaluations on accidents
- Implementing lessons learned
- **Safety needs a good balance between the plant operator and the authorities**



HOW DO YOU CONNECT?

Notification!

- (a) the name and/or trade name of the operator and the full address of the establishment concerned;
 - (b) the registered place of business of the operator, with the full address;
 - (c) name and position of the person in charge of the establishment, if different from point (a);
 - (d) information sufficient to identify the dangerous substances and category of substances involved or likely to be present;
 - (e) the quantity and physical form of the dangerous substance or substances concerned;
 - (f) the activity or proposed activity of the installation or storage facility;
 - (g) the immediate environment of the establishment, and factors likely to cause a major accident or to aggravate the consequences thereof including, where available, details of neighbouring establishments, of sites that fall outside the scope of this Directive, areas and developments that could be the source of or increase the risk or consequences of a major accident and of domino effects.
2. The notification or its update shall be sent to the competent authority within the following time-limits:
- (a) for new establishments, a reasonable period of time prior to the start of construction or operation, or prior to the modifications leading to a change in the inventory of dangerous substances;
 - (b) for all other cases, one year from the date from which this Directive applies to the establishment concerned.
3. Paragraphs 1 and 2 shall not apply if the operator has already sent a notification to the competent authority under the requirements of national legislation before 1 June 2015, and the information contained therein complies with paragraph 1 and has remained unchanged.
4. The operator shall inform the competent authority in advance of the following events:
- (a) any significant increase or decrease in the quantity or significant change in the nature or physical form of the dangerous substance present, as indicated in the notification provided by the operator pursuant to paragraph 1, or a significant change in the processes employing it;
 - (b) modification of an establishment or an installation which could have significant consequences in terms of major-accident hazards;
 - (c) the permanent closure of the establishment or its de-commissioning; or

Identification!

Compliance!

Monitoring/Enforcement!

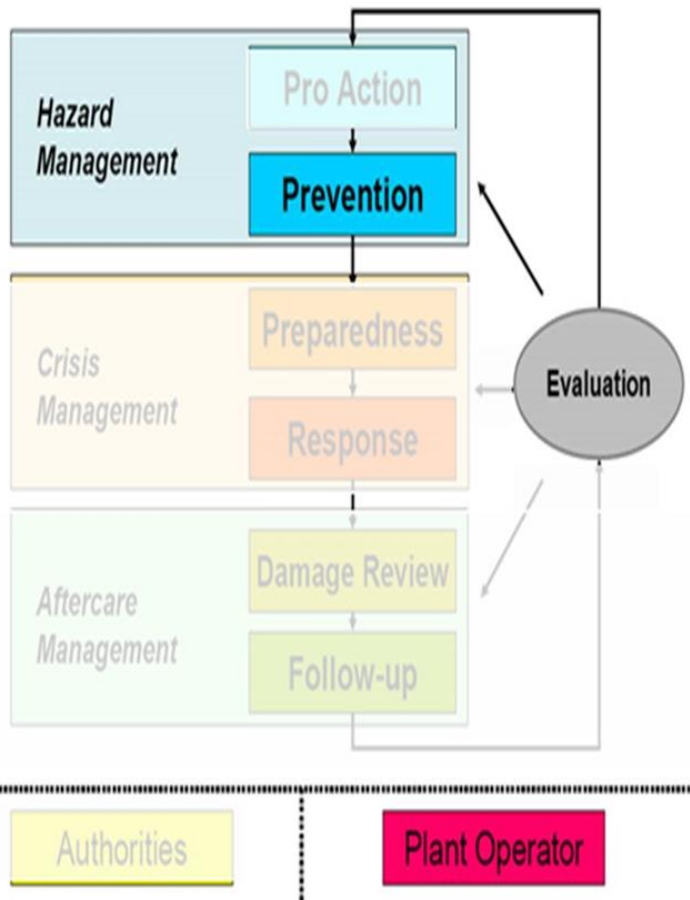


Chemie Pack 2011





Chemie Pack (storage) 2011



Direct cause

- ☐ Working with open fire, prohibited
- ☐ A small fire got out of control and could turn into a large poolfire by igniting 120 IBC containers

Underlying cause

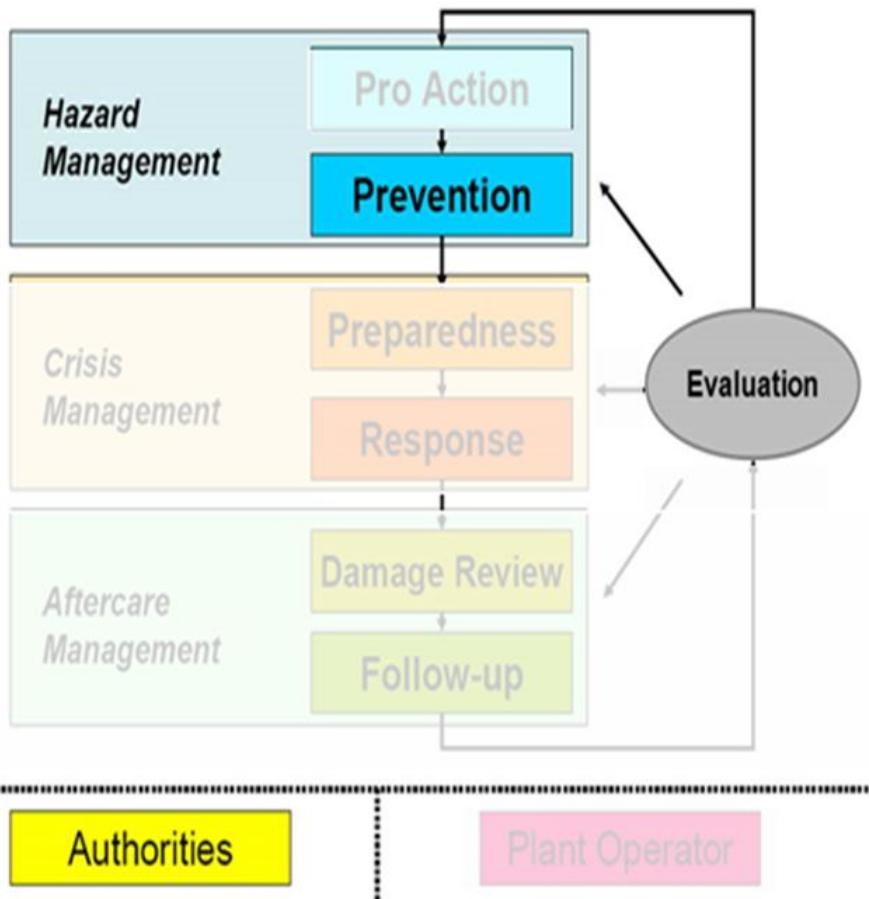
- ☐ Poor safety management.
- ☐ No safety instructions IBC containers were stored in an area without fire extinguishing system
- ☐ Potential dangers of IBC-storage were known, but no action was taken.

Root cause

No notification!! The site evolved into an 'upper-tier' (annex I) establishment without notice...



Chemie Pack (authorities)



Permission

- Attitude of municipality towards the permitting process not appropriate.

Monitoring

- Manifest violation of regulations and poor safety management but no effective intervention.
- Inspections and monitoring activities were announced.
- A fractured organization of safety monitoring. Different authorities and organizations and partial responsibilities.
- Therefore no complete understanding of the company, no clue!
- Inspectors short of knowledge!



Reference casus

- https://onderzoeksraad.nl/uploads/items-docs/1805/Rapport_Chemie-Pack_EN_def.pdf



Notification towards?

Different competent authorities:

- ☐ Labour inspectorate (national)
- ☐ Environmental authorities (both provinces and municipalities)
- ☐ Safety regions (regional, fire department)
- ☐ Waterboards (national and regional)

It takes more to Tango



Results

Authorities performed insufficiently

- ☐ A fractured organization of safety monitoring.
- ☐ No coordination between authorities
- ☐ Partial responsibilities.
- ☐ Different approaches on identification, monitoring and law enforcement
- ☐ No sharing of information
- ☐ No clue at all

- ☐ Not taken seriously (by the operators)

No need to meet, no need to notify





Backoffice BRZO

