

Norwegian Environment Agency -Inspection Routines

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Our routines for inspections

I would like to present:

- Who we control
- Selection of control objects
- Planning of inspections
- how we carry out inspections
- inspection reports
- how we follow up inspections



Who we control

Industry

Industry:

- Mining
- Pulp and paper
- Smelting
- Waste treatment plants
- Landfill
- And others.



Waste treatment

- Area with most frequent non-compliances
- Handling, storage and treatment of waste is a topic in most industry inspections and audits
- Hazardous waste treatment sites
 - Closely monitored
 - Continuous campaign for three years



Petroleum Industry- 12% of our resources

- 10-15 audits/year
- Visit to each site/installation every 3-4 years
- 4-5 day audits
- Site visit (weather permitting)



Photo: Shell



- 12 % of our inspection resources are allocated to this industry

Products- 15% of our resources

- Inspections of importers, 2000 companies
- Approximately 40 inspections per year
 - Product documentation
 - CE marking
- Cooperation with customs
- Visits to shops/markets - spot check
- Desk top control (questionnaires)
- Prioritized groups of articles:
 - Toys and childcare products
 - Textiles and furniture
 - EE-products
 - Building products
 - Jewelry



Dangerous substances and preparations- 20% of our resources

- Focus on importers and producers
- Approx. 1100 enterprises
- Mainly inspections
- 50-70 inspections every year
- Campaigns in shops/stores
 - Child proof fastenings
 - Labeling and packaging
 - Illegal chemicals (eg toxic chemicals cannot be sold to consumers)
- Desk top controls (questionnaires)
- Use data from Product Register to decide which companies to inspect
- Also tips and follow-up of controls in shops/retailers



Transfrontier shipments of waste

- Audits of the take back schemes
- Audits at the border
- Follow the waste stream
- Very detailed regulations
- Cooperation with customs and authorities in the countries of arrival



Selection of control objects



Risk based inspections

Planning ahead:

- prepare 3-year plans to ensure a thorough risk based monitoring system
- vary inspection methods to guarantee efficient utilization of available resources
- carry out inspections when new legislation has been implemented (to build knowledge and secure compliance)

Focus on:

- areas where the impact on the environment is largest
- areas where the probability of legislation breaches is largest

This helps to give us the most efficient use of our resources

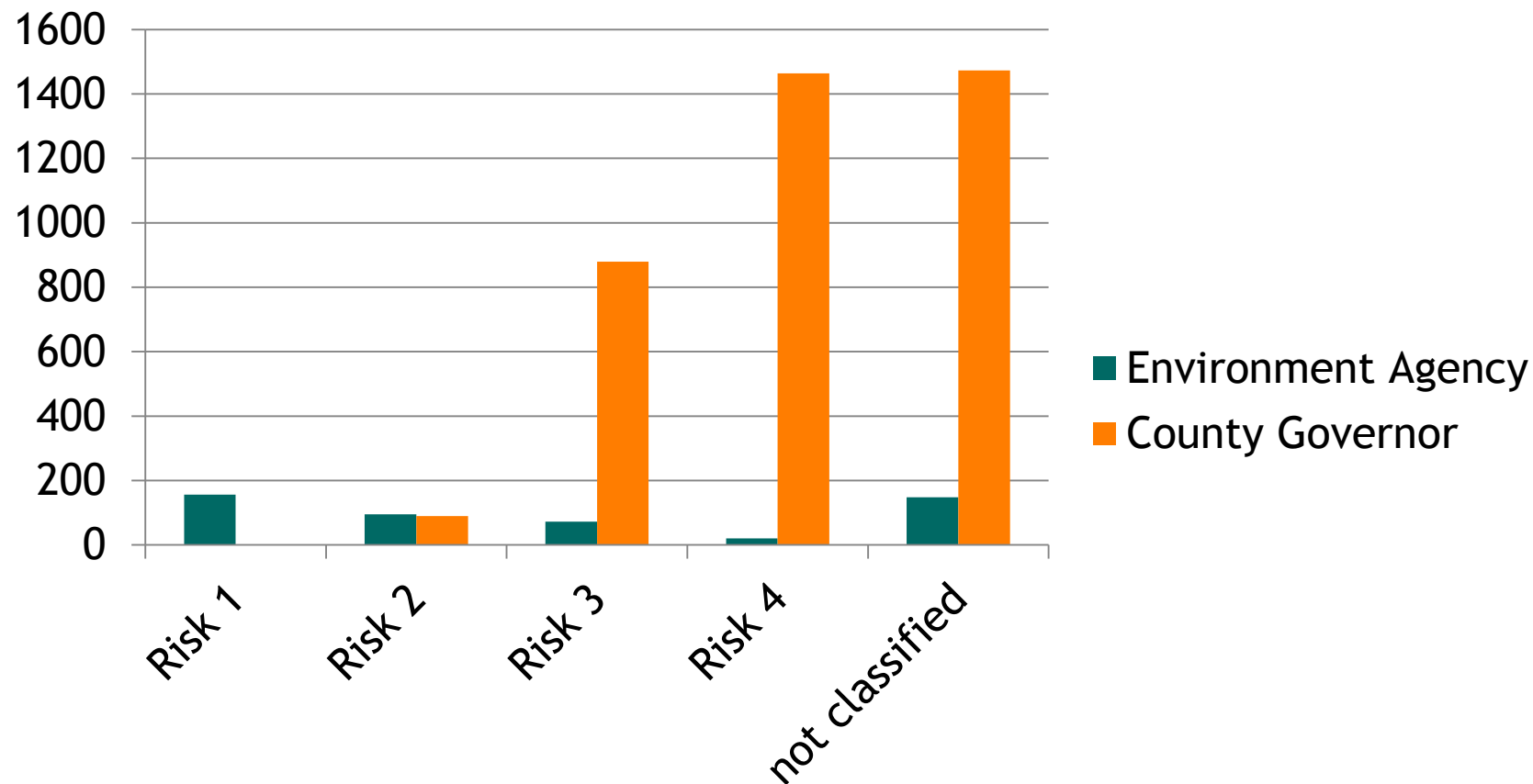
Four risk categories for industry sites

| Risk categories | Type of emission/discharge | Type of recipient | Examples |
|---------------------------------|---|---|--|
| 1 (high polluting potential) | High/hazardous High/hazardous (Waste: most hazardous) | Weak and very sensitive Medium sensitive | oil production petrochemical industry Hazardous waste |
| 2 | Medium hazardous High/severe | Weak and very sensitive Good, not very sensitive | municipal and hospital waste chemical industry pharmaceutical industry |
| 3 | Small/less hazardous Medium hazardous | Weak and sensitive Medium sensitive | textile waste treatment plants chemical industry Feed industry |
| 4 (low polluting potential) | Small/less hazardous Medium hazardous | Medium sensitive Good, not very sensitive | paper industry metal working industry fish processing industry |

Inspection and audit frequency

| Risk category | Frequency | | |
|---------------|-----------|---------------------------------------|--------------------------------|
| | Reporting | Inspection | Audit |
| 1 | Annually | Every 4. year | Every 4 year 25 000 € (fee) |
| 2 | Annually | Every 6. year | Every 6. year 17 000 € |
| 3 | Annually | 3. or 4. year 1 500 € | Never |
| 4 | No report | After complaint or incidents 550 € | None |

Norwegian Control Subjects



Planning inspections



Planning, prioritizing and coordination

- Planning and priority decisions:
 - Management responsible for deciding who to inspect and where to go
 - Inspector responsible for determining when to perform the audit, and to some extent to decide the topics relevant for the specific audit
- Coordination
 - With other relevant inspectorates
 - Petroleum safety authority
 - The labour inspection authority
 - Directorate for civil protection and emergency planning
 - The food safety authority

Information we use when preparing for inspections

- Discussions with case handlers
- Permit
- Previous inspection reports
- Self- monitoring reports
- Archived documents
- Checklists
- Online register of all organisations (brunnøysund)

Carrying out inspections

Control methods

- Audits and inspections
 - Emergency inspections based on incidents
 - Desk top control (complaint)
 - Planned Inspections (according to risk categories)
 - announced and unannounced
- Inspection campaigns (3-4 every year)
- Annual self monitoring



Organization of the audit team

- Responsibilities of the different roles in the audit team
 - Audit leader (workload: 4 weeks)
 - Planning
 - Interviews
 - Verification
 - Reporting
 - Follow-up
 - Auditors (workload: 2 weeks)
 - Assistance during interviews, verification and reporting
 - Case handler for the control subject

Performing the audit - interviews

- Interview with key personnel at different levels in the organization
- Keep focus on predefined topics
- Prepare questions according to activity/theme
- Interview several levels
 - Corporate level
 - Management
 - Mid-level
 - Employees/operators

Verifications

- On-site inspections
- Investigations of documents, journals and logs
- Observe the practice



Inspection reports



Findings

Non-compliance:

Failure to meet requirements specified in the terms of the discharge permit or current acts and regulations

Observations:

Aspects which according to the authority is necessary to point out to ensure environmental improvement, but is not defined as a non-compliance

Other aspects

Subjects brought up during the Audit, and which may be useful for the enterprise and authority to be aware of. This may also include comments on subjects that are included in the Audit, but where no observations or non-compliances were found.

Sanctions

- Written, public report
 - With deadline for feedback
- Coercive fines
- Report to police
 - If found guilty: fine or prison
- Revoking permit
- Use newspapers/media
- No penalties



Following up inspections

Reporting and follow-up

All inspections and audits are followed-up by a written report describing the findings. These are:

- Non-conformities
- Observations

Correction of non-conformities, or a plan for this, must be confirmed to the authorities within a set date

Plans should be realistic based on the enterprise's capacity and economy



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