



# 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

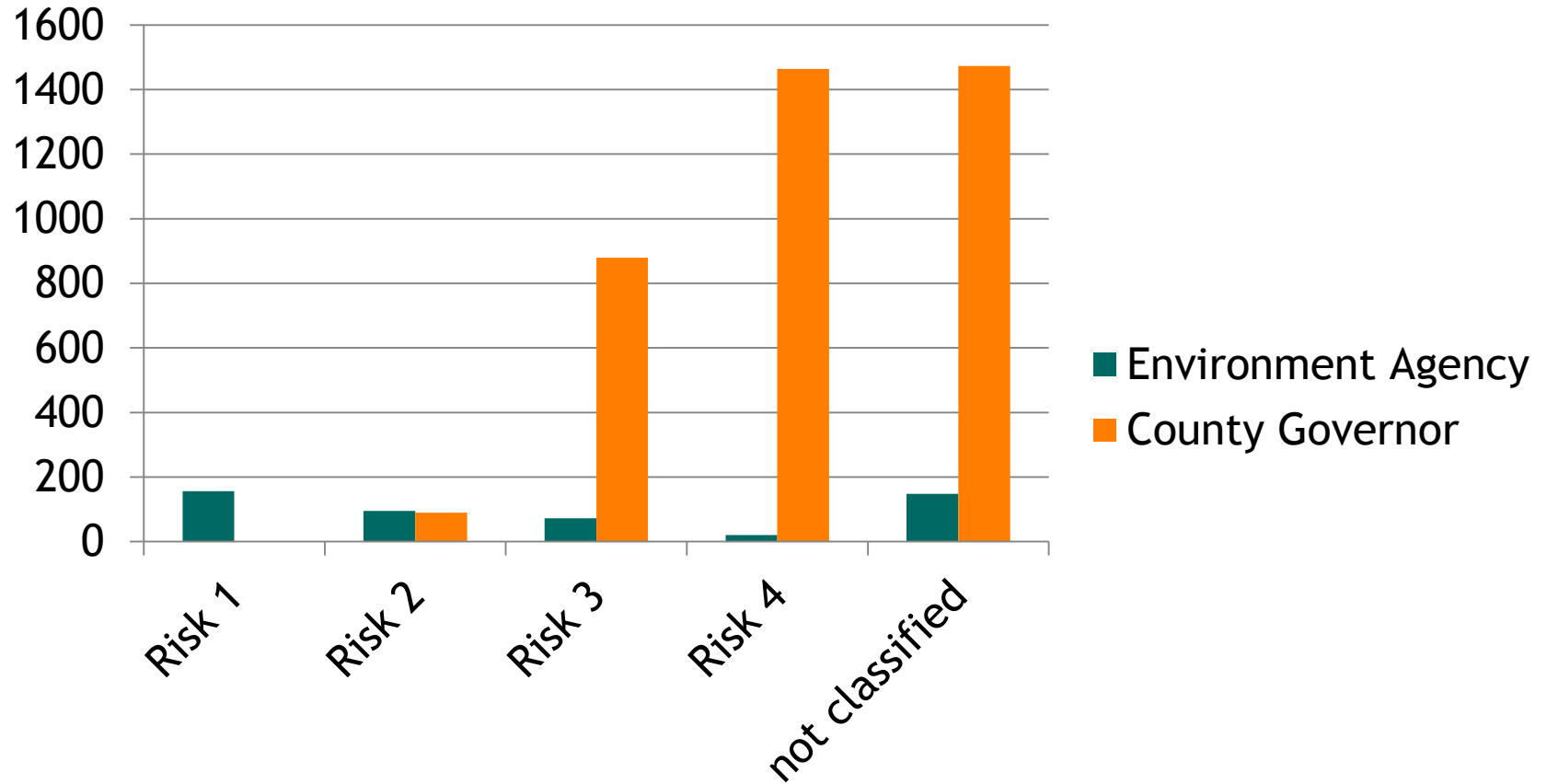
# Four risk categories for industry sites

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

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## 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



# Contact Information

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