

EHS Issues Covered by ENHESA's EHS Regulatory Monitoring Service for Production – Distribution – Warehouse – Installation – Administration

1. Administrative & Legal Structure

1.1 Competent Authorities

(Including, as appropriate who are the public authorities at national and local level that deal with EHS issues)

1.2 Regulatory Structure

(Including, as appropriate information on the legal structure, how legislation and regulations are adopted and enforced, the regulatory framework for EHS issues)

1.3 Background Information

(Including, as appropriate information on management systems, fiscal incentives, information sources,...)

2. General Environmental Requirements

2.1 General Environmental Duties

(Including, as appropriate and regulated: general duty of care, pollution prevention, external communications, public relations and community right-to-know, corporate environmental reporting, etc)

2.2 Permits and Licenses

(Including, as appropriate and regulated: environmental impact assessment, construction permit, operating permit, start-up permits, integrated permits, permit modifications/review, natural resources conservation, etc.)

2.3 Release Reporting / General emissions report

(Including, as appropriate and regulated: pollutant emission reports, etc.)

2.4 Site Contamination

(Including, as appropriate and regulated: investigations and reporting, threshold limits, monitoring, remediation/containment obligations, property transfer requirements, public registers, etc.)

3. Air Emission Management

3.1 Air Emission Restrictions

(Including, as appropriate and regulated: permits and authorizations, restrictions and limitations, measurement and monitoring, recordkeeping and reporting obligations, emission fees) (Covers process emissions and emissions from heating installations, fugitive emissions, etc.)

3.2 Climate Change

(Including, as appropriate and regulated: CO₂ and energy efficiency, recordkeeping and reporting, emissions trading)

3.3 Ambient Noise and Odors

4. Water Management

4.1 Wastewater Discharges

to surface water, sewer, groundwater, accidental discharge, stormwater

(Including, as appropriate and regulated: permits and authorizations, restrictions and limitations, measurement, recordkeeping and reporting obligations, fees, etc.)

4.2 Water Abstraction and Use

from surface water and from groundwater

(Including, as appropriate and regulated: authorizations, restrictions, drinking water quality, measurement and recordkeeping and reporting obligations, fees)

5. Waste Management

5.1 General (non-hazardous) Waste

(Including, as appropriate and regulated: definition and classification, prevention, storage, handling, transport, treatment, recycling, disposal, incineration, recordkeeping and reporting, fees, take back of packaging waste + electronic waste + vehicles + etc)

5.2 Hazardous/Special Waste

(Including, as appropriate and regulated: definition and classification, prevention, storage, handling, transport, treatment, recycling, disposal, recordkeeping and reporting, fees, used oil, battery waste, clinical and biological waste)

5.3 International Waste Shipments

6. Chemicals Management

6.1 New and Existing Chemicals

(Including, as appropriate and regulated, classification of chemical substances and preparations, testing and notification requirements for production, placement on market and import/export)

6.2 Packaging & Labeling

(Including, as appropriate and regulated: how do chemicals need to be packed, who needs to label them in which language, with which symbols, what type of information needs to be on the label, etc)

6.3 Use and Marketing Restrictions/Prohibitions

(Including, as appropriate and regulated: restrictions on use and marketing of certain chemicals, such as solvents, heavy metals, etc.) (Note: For PCBs and Asbestos, see the section on Management of Hazardous Materials)

6.4 Ozone-Depleting Substances

(Including, as appropriate and regulated: authorizations, restrictions, measurement and reporting obligations, maintenance requirements for fire-fighting or cooling installations containing ODS, etc)

6.5 Material Safety Data Sheets

(Including, as appropriate and regulated: who needs to elaborate them and for which chemicals, according to what format, with which information, in which language, when do they need to be given to whom, who needs to keep them where, etc)

7. Hazardous Materials Management/Transport

7.1 Storage and Handling

(Including, as appropriate and regulated: underground storage, above ground storage, inventories and registers, recordkeeping and reporting) (covers petroleum products, flammable materials, explosive materials, toxic and dangerous substances and, preparations, gases and materials)

7.2 Polychlorinated Biphenyls (PCBs/PCTs)

(Including, as appropriate and regulated: since when is their production, import or marketing prohibited, what about existing equipment contaminated with PCBs, maintenance, decontamination and disposal requirements, labeling and registration requirements, etc)

7.3 Asbestos

(Including, as appropriate and regulated: which asbestos fibers are regulated, since when is their production, import or marketing restricted, what about existing equipment and facilities contaminated with asbestos, maintenance, decontamination and disposal requirements, labeling and registration requirements, etc)

7.4 Hazardous Materials Transport

(Including, as appropriate and regulated: definition, packaging and labeling, restrictions, documentation, driver training, transport by road and rail etc) It does not cover transport of dangerous goods by waterway, air or sea.)

8. Safety Management

8.1 Duty of Care / General Prevention

(Including, as appropriate and regulated: General Obligations / Duty of Care; Prevention Principles; Director liability; Policy Statements; H&S Service; H&S Committee; Employee Consultation; Inspections & Registers; Recordkeeping and Reporting; Purchasing Procedures; Fees; ...)

8.2 Risk Assessment & Risk Management Programs

8.3 Information, Communication & Training

(Including, as appropriate and regulated: H&S signs; Hazard Communication; Training (upon recruitment, refresher, training, specific training, etc.))

8.4 Special Cases and Protected Classes of Employee

(Including, as appropriate and regulated: night work; pregnant and nursing workers; young workers; temporary workers, etc.)

8.5 On-Site Contractors & Construction Activities

(Including, as appropriate and regulated: specific provisions to be taken to inform and manage H&S aspects of contractors working on site; specific provisions applicable to construction work; etc.)

9. Process Safety

9.1 Machinery and Work Equipment Safety

(Including, as appropriate and regulated: Machine Design and Installation; Equipment safety inspections and certifications; Emergency Stops; Equipment maintenance; Operator information and training; Industrial vehicles; Machinery Safety Marks (CE-Mark); etc.)

9.2 Lock Out/Tag Out

(Including, as appropriate and regulated requirements to control the movement and activation of machinery during maintenance, repair, incidents, etc.)

9.3 Confined Spaces

(Including, as appropriate and regulated requirements to prevent people from being stuck in a confined space without possibility for escape or to protect people against the presence of gases in confined spaces)

9.4 Welding and Cutting, Hot Work

(Including, as appropriate and regulated requirements to use a hot work permit system, to restrict use of open fire, to ensure proper ventilation, etc.)

9.5 Lifting Equipment, Material Handling Equipment

(Including as appropriate and regulated: lifts, elevators, forklift trucks, other powered industrial vehicles, shipping and receiving dock safety)

9.6 Fall Protection / Working at Heights

(Including, as appropriate and regulated requirements on providing guards and rails as of a certain height, to use harnesses, to have supervision, to have special training, etc)

9.7 Pressure Vessels

(Including as appropriate and regulated: boilers, compressed gas cylinders, installation permits, operating and maintenance requirements, registers, reporting, notification of accidents, etc.)

9.8 Electrical safety

(Including as appropriate and regulated: working with low- and high-voltage installations, training and certifications, work permits, inspections, etc.)

9.9 Personal Protective Equipment

(Including as appropriate and regulated: respiratory protection, the provision of PPE, selection criteria for PPE, maintenance, training, compulsory use, signs, etc.)

10. Emergency Preparedness/Response

10.1 Fire Prevention and Response

(Including, as appropriate and regulated: fire permit/certificate, fire resistance of structures, organization of fire response teams, fire detection, alarms/signals fire fighting equipment, fire drills and evacuation, means of egress and ingress, etc.)

10.2 Accidental Releases

(Including, as appropriate and regulated: spill prevention, containment and cleanup)

10.3 Major Industrial Accidents

Including, as appropriate and regulated: threshold quantities, emergency prevention and response plans, safety reports, liaison with public authorities and neighbors, reporting, etc.

11. Occupational Health

11.1 Medical Surveillance

(Including, as appropriate and regulated: medical examinations, engagement of occupational physician services, internal/external medical services, medical record retention, etc.)

11.2 First Aid

(Including, as appropriate and regulated: pharmacy box, first aid room, first aid qualifications, ensuring first aid, etc),

11.3 Accident/Occupational Illness and Injury (OI&I) Investigation, Recordkeeping and Reporting

11.4 Workplace Requirements

(Including, as appropriate and regulated: lighting, ventilation, temperature, space, stress, etc.)

11.5 Ergonomics

(Including, as appropriate and regulated: general requirements to fit the work to the worker, manual handling of loads, visual display units, etc.)

11.6 Exposure Limits & Protection

(Including, as appropriate and regulated: exposure to chemical agents, carcinogenic substances, biological agents, noise & vibrations)

11.7 Ionizing and Non-ionizing Radiation

(Including, as appropriate and regulated: x-ray devices, measurement instruments, lasers, etc.)