



SWEDISH
ENVIRONMENTAL
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This document is a translation made by SHK of the original response in Swedish to the safety recommendation. In case of discrepancies between this translation and the Swedish original text, the Swedish text shall prevail in the interpretation of the response.

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LETTER
23/06/2022

Case number
NV-05297-21

Swedish Accident
Investigation Authority
info@havkom.se

Actions taken in response to the Swedish Accident Investigation Authority's recommendations to the Swedish Environmental Protection Agency, SHK registration number S-116/21

Background

The Swedish Accident Investigation Authority (SHK) has investigated an occurrence that took place on 31 May 2021 in which a fire broke out in conjunction with the loading of waste onto a vessel. In the investigation recommendations were issued to several parties for the purpose of preventing similar accidents and incidents from happening in future. The recommendations have been compiled in SHK report S-116-12 - *Final report RS 2022:05 Fire in waste in the cargo hold of the vessel SALAR on 31 May 2021 in the Port of Landskrona, Skåne County*. The following recommendations were issued to the Environmental Protection Agency in the report:

1. In collaboration with the county administrative board, strengthen the supervisory guidance to the municipalities regarding supervision of waste disposal operators. The supervisory guidance should address questions about the importance of inspections of the waste, special risks with certain types of waste and how the inspections can be carried out in practice, and
2. promote the analysis of the risks of mixing combustible waste into metal waste. Based on the results, the guidance in the area should be revised.

Fires in waste can have an environmental impact through, among other things, emissions of unwanted hazardous substances, including what are known as POPs (persistent organic pollutants), which have the potential to cause undesirable effects far from the source from which they were emitted.

Waste fires often also risk having a direct impact on the surrounding environment through emissions of fumes, contaminated extinguishing water, soot and particles, and can cause contaminant damage to soil, sediment and surface and ground water.

The Environmental Protection Agency has identified fires during waste handling as a priority area in its national environmental protection efforts – especially with regard to supervisory guidance initiatives. Both the national waste plan¹ and the Environmental Protection Agency's supervisory guidance plan for the period 2022–2024 describe applicable prioritisation of this matter [Plan för tillsynsvägledning 2022–2024 \[Plan for supervisory guidance 2022–2024\]](#) (naturvardsvverket.se)

¹ 2020, Swedish Environmental Protection Agency report 6946 *Att göra mer med mindre – nationell avfallsplan och förebyggande program 2018 – 2023 reviderad 2020* [Doing more with less – national waste programme and prevention programme 2018 – 2023 revised 2020]

Implemented and planned measures

The Environmental Protection Agency is grateful to have been given the opportunity to put forward its opinions on the case during SHK's investigation of the occurrence in question. Among other things, this has given us a great understanding that the intention of the recommendations issued in the report is to prevent similar occurrences from happening in the future. In addition, we believe that SHK's recommendations have the potential to serve as an important foundation for our forthcoming work with initiatives within supervisory guidance in the field of waste. In this context, we would like to specifically point to our supervisory guidance plan for the period 2022–2024 and the prioritised initiative in this plan:

- *Guidance on supervision of waste storage – e.g. setting requirements during notification due to fire hazard, leakage of hazardous substances etc.*

Following the publication of report S-116/21, the Environmental Protection Agency has taken the initiative to arrange a meeting with the Swedish Civil Contingencies Agency (MSB). During this meeting, which took place on 18 May 2022, we discussed what potential there was to use research and development to work with initiatives to learn more about fires in waste, which stakeholders are able to contribute to unified guidance in the field of waste fires and opportunities and prerequisites for promoting the coordination of municipal supervisory agencies for fire and environmental and waste issues, respectively, in order to strengthen supervision.

Conclusions

Strengthening, in collaboration with the county administrative board, the supervisory guidance to municipal supervisory authorities that deal with questions of importance of inspections of waste, special risks with certain types of waste and how the inspections can be carried out in practice is deemed possible to undertake with the support of the national waste plan and within the scope of an existing and adopted supervisory guidance plan.

The significance of mixing combustible waste into metal waste is one area where action may be required in order to learn more. Through contact with the Swedish Civil Contingencies Agency, the Swedish Environmental Protection Agency has identified which potential stakeholders may be able to contribute to this work.

Decisions concerning this letter have been made by Ingela Hiltula, head of department, following a presentation by Erika Nygren, head of unit. John Lotoft, administrator, has otherwise participated in the final administration of this matter.

This decision has been made digitally and therefore does not have signatures.

On behalf of the Swedish Environmental Protection Agency

Ingela Hiltula

Erika Nygren