INEOS Solvents

CODE OF PRACTICE FOR THE SAFE PRE- AND ON CARRIAGE OF CONTAINERS

October 2018

FOREWORD

INEOS Solvents Germany GmbH,
INEOS Solvents SA,
INEOS Solvents Ethanol Ltd.,
referred to as INEOS Solvents.

It is INEOS Solvents policy that safety of operation must be paramount. The implementation of this policy in the distribution field poses special problems because of the extent to which we are dependent on third parties and the difficulty of supervising distribution operations in the field. We must nevertheless be quite satisfied that our distribution operations are carried out competently and safely, and in accordance with national legislation in force. This *Code of Practice for the safe pre- and on carriage of containers'* has been prepared to help fulfil this aim.

SCOPE

This Code applies to the road transport of containers to and from container terminals, including loading at Ineos Solvents Europe sites and delivery to the final destination

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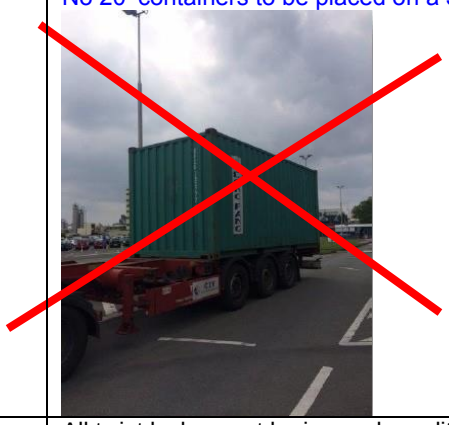
SECTION 1 DRIVING SAFETY STANDARD

The following comprises a basic set of safety requirements which must be met for all INEOS Solvents logistics activities including specs of vehicles and driver requirements, except when mentioned **'recommended'** in which case this topic is considered to be good practice but it is not a requirement. In any instance where the following requirements conflict in any way with legal requirements in the country of registration of the vehicle, the latter shall be complied with and take precedence.

1 General vehicle Requirements

1.1	Design
1.1.1	Vehicles and equipment shall be fit-for-purpose conforming to recognized specifications.
1.2	Maintenance
1.2.1	All vehicles, and the equipment fitted to them shall be included in a maintenance program with the appropriate records maintained.
1.3	Tyres, Brakes & Suspension
1.3.1	All vehicles shall be fitted with tyres with tread depths in accordance with the statutory minimum
1.3.2	Remoulded, regrooved or remixed tyres shall not be used on steering axles.
1.3.3	All vehicles have fully functioning brake systems with linings and brake discs meeting minimum wear tolerances.
1.4	Vision
1.4.1	All vehicles fitted with left and right hand wing mirrors, and convex mirrors for blind spots.
1.4.2	All vehicles fitted with operating headlights, direction indicators, tail/brake lights and windscreen wipers.
1.4.3	In countries where it is not yet a legal requirement, It is **recommended** that reflector strips (i.e. conspicuity tape) be fitted to the rear perimeter and sides of vehicles, consistent with local laws and regulations.
1.5	Visibility & Protection to other road users
1.5.1	All vehicles have an operable horn/warning device.
1.5.2	In countries where it is not already a legal requirement, it is **recommended** that the vehicles are fitted with a backing alarm.
1.5.3	All vehicles to be fitted with mudguards and mud flaps.
1.5.4	All delivery vehicles larger than 12.5 tons shall have rear under run protection to protect against damage from rear end collision and to prevent contact by the colliding vehicle with the chassis rails.
1.6	Driver & Passenger Safety
1.6.1	Vehicles shall be fitted with a three-point integrated seat belt for each occupant seat.
1.6.2	All windows (doors, windscreen, and cabin rear) shall allow unimpaired vision (i.e. no cracks, etc.).
1.6.3	All vehicles shall have stowage devices so that equipment is not free to move around in the cabin (e.g. jacks and tools).
1.6.4	All vehicles shall carry a fit-for-purpose first aid kit.
1.7	Legislation
1.7.1	Vehicles shall not exceed the legal axle loads as set down in the country or area of operation.
1.7.2	All vehicles meet the emission standards in their country or area of operation.
1.7.3	All vehicles meet the licensing requirements of the country or area of operation.
1.8	Control and enforcement
1.8.1	All vehicles shall have an operational speedometer.
1.8.2	All vehicles must be fitted with an operational vehicle driving monitor (e.g. Tacho) that must be capable of recording individual driver's driving and resting hours.

2 Requirements trailers

2.1	Specific requirements for **container chassis**
	Containers must always be placed at the back of the container chassis. No 20' containers to be placed on a 30/ 40' multi chassis. 
2.1.1	All twist locks must be in good condition and must be fitted with securing pins which must be in place during transport.
2.1.	Full inspection of twist lock integrity must be controlled via a routine maintenance inspection program.

3 Driver selection, information and training

3.1	The haulier must have a policy in place for **driver selection**. This policy will include theoretical and practical evaluations (including medical exams) that drivers must pass according to their route, products and type of vehicle, as well as other elements that prove a positive attitude towards all aspects of HSSE. The policy will clearly define the required profile for a driver regarding age, experience, physical condition, knowledge of laws and regulations, etc. including legal documents: license, medical certificate.
3.2	All drivers must possess a valid driving license for the class of vehicle being operated and inform their supervisor of any change to the status of their license.
3.3	The haulier must provide each driver with instructions in writing (a "**Driver's Manual**"), which will include all day to day instructions, operating procedures, daily checks etc.
3.4	Drivers shall successfully complete an **on-road driving assessment** as part of their recruitment/selection.
3.5	All drivers shall undertake a **defensive driving training** (BBS-driving according to ECTA guidelines or equivalent) within one year of commencing driving on INEOS Solvents business.
3.6	There must be an up-to-date register of all driver trainings.

4 Fatigue, Drugs, alcohol and substance abuse and excessive speed

4.1	It must be ensured that reward mechanisms do not provide an incentive for drivers to drive excessive hours (which could lead to them driving whilst tired or fatigued) or drive at excessive speed.
4.2	Drivers are obliged to stop driving if they are tired or fatigued. They should either make alternative travel arrangements or have an appropriate period of rest/sleep before driving.
4.3	Drivers must be explained the main risks of **Tiredness & Fatigue** and how to deal with it.
4.4	Driving and resting hours must comply with the EU Driving and Resting time directive EC 561/06
4.5	There must be a drugs, alcohol and Substance Abuse Policy which has been formally advised to all drivers
4.6	INEOS Solvents expects any driver that is required to take medication that is recognized as having the potential to affect driving performance to report the matter to his management immediately

5 Use of Mobile Phones

5.1	It is the INEOS Solvents policy that drivers may NOT use any mobile phone or other two-way communication device, not even hands-free, while a vehicle is in motion.

6 Seat Belts

6.1	Seat belts must be worn by all vehicle occupants in vehicles performing transportation services for INEOS.

7 Communicate the INEOS Solvents safety requirements to drivers

7.1	A document with the main INEOS Solvents safety requirements is attached in appendix 1 and must be made available to all drivers.

SECTION 2 PERSONAL PROTECTIVE EQUIPMENT (PPE)

2.1 INEOS Solvents have minimum PPE requirements for drivers when they come on one of their sites. The locations where these PPE requirements apply are indicated below. **More stringent PPE requirements may apply at other locations** (e.g. at customer premises). The PPE requirements do not apply when driving on the public road except for the Hi-vis jackets which must be worn when the driver has to leave his truck in case of problems.

2.2 Minimum requirements:

- **Light eye protection (safety glasses)**
- **Safety shoes**
- **Helmet**
- **Hi-vis jacket**
- **Overall (see below)**

2.3 Site specific Requirements for Overalls:

Site	Standard overall	FRC Overall
Moers		**X**
Herne		**X**
Grangemouth	**X**	
TCS Duisburg	**X**	
…	**X**	

Definitions:

Light eye protection	Safety spectacles to EN 166F or equivalent.
Safety Shoes	Ankle high, chemically resistant with steel toe and sole and anti-static sole to EN 345 or equivalent.
Helmet	Helmet to EN397 or equivalent.
Hi-vis(ability) Jacket	Jacket to EN 471 class 2 or equivalent. **To be worn when specifically required on sites and when working on (public or private) roads, during shunting operations and at places with bad visibility.** **It is especially important that a jacket is worn in areas of high Fork Lift Truck activity.**
Standard Overall	One or two piece overall.
FRC (Flame Retardant) Overall	One or two piece overall with long trousers and long sleeves. Antistatic according to EN 1149 (EN 1149-1 or EN 1149-3) and flame retardant according to EN 531 (A, B1, C1, E1).

SECTION 3 ASSESSMENT OF THE COMPETENCE OF HAULIERS

3.1 INEOS Solvents prefer their hauliers for pre- and on carriage to be SQAS assessed ('Transport Service' module). All info on the SQAS assessment system can be found on: www.sqas.org.

3.2 INEOS Solvents have set criteria for evaluating the SQAS Assessment Reports.

3.3 Where any deficiency is noted between the SQAS Assessment Report and the specific criteria set by INEOS Solvents, these deficiencies will be examined with the haulier and an action programme with timetable for rectification agreed.

3.4. In the absence of an SQAS assessment, INEOS Solvents may decide to carry out an own safety audit to gain assurance that the minimum safety requirements are met.

SECTION 4 SUBCONTRACTING OF TRANSPORT SERVICES

4.1 Hauliers are permitted to use subcontractors provided that it is ensured that the subcontractor meets all the INEOS Solvents requirements. The haulier must have an effective means to communicate the INEOS Solvents safety requirements to the sub-contractors. As a minimum, the document "Logistics safety requirements for INEOS Solvents" as published on the website https://www.ineos-solvents.de/logistic-matters/drivers-safety-instructions/ must be made available to the sub-contractors.

SECTION 5 INCIDENTS AND ACCIDENTS

5.1 In the event of an incident or an accident during transport, handling, loading and unloading activities INEOS Solvents must be informed immediately**, even when the load is not affected**.

5.2 The INEOS Solvents emergency telephone number is: **+ 44 (0) 1235 239 670**
As this Call Centre uses interpreters, the caller can speak his native language.

5.3 INEOS Solvents requires that the haulier must also be able to respond rapidly and effectively if one of its vehicles is involved in an accident emergency. The haulier must have an emergency plan covering response to an accident at any point on the route that the vehicle travels.

SECTION 6 NEAR MISS REPORTING

Near misses are unsafe situations which, in slightly different circumstances, could lead to an accident. All hauliers are encouraged to report near misses. Examples are:

- Reversing in a narrow street to reach the unloading place
- Unloading from the public road
- Unsafe traffic situation on the container terminal

A near miss form is attached in appendix 2.

SECTION 7 LOADING REQUIREMENTS

Forklift Segregation

At all INEOS Solvents sites, forklift segregation rules are in place.

The driver needs to remain in his cabin during the whole loading process. The forklift operators are instructed to stop the loading activity each time the driver leaves his cabin during loading.

A safety video to explain the principles has been issued and must be shown to all drivers before a first loading at an INEOS Solvents site. The video is available on https://www.ineos-solvents.de/logistic-matters/safety-videos/

A safety note on forklift segregation is attached in appendix 1.

SECTION 8 VEHICLE SPOT CHECKS

At the INEOS Solvents loading sites, INEOS may carry out spot checks of vehicles/ drivers in order to check compliance against the INEOS Solvents safety requirements.

8.1 : Random Spot checks at arrival trucks at the INEOS loading sites

- General condition of the vehicle
- Condition lights of vehicle (not broken, not damaged)
- **Condition of tyres (no bold tyres)**
- **Condition of twist locks (can be tightened and locked)**
- Fire Extinguishers (condition, expiry date valid)
- Required PPE being worn by the driver (according to INEOS Solvents standard)

The two criteria in bold should give rise to rejection in case of nonconformance (e.g. bold tyre or twist lock which cannot be tightened/ locked)

8.2 Seat belt compliance checks

Random checks for seat belt compliance are done on- and off site.

APPENDIX 1: FORKLIFT SEGREGATION PRINCIPLES

APPENDIX 2: NEAR MISS FORM

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UNSAFE CONDITIONS?

INEOS Ref-Nr:	
Customer name:	
Date:	
Name Haulier:	
Name Driver:	

Loading location

	Yes	No	Comment
Have you encountered unsafe situations during the loading? If yes, please state which.			

Journey

	Yes	No	Comment
Have you encountered unsafe situations during the journey? If yes, please state which.			

Delivery location

	Yes	No	Comment
Safe access to the unloading area?			
Unsafe condition noticed? If yes, please describe.			