

April 2015

Dear Mrs, Sir

Re: Safety when delivering polymers in Bulk

For the Ineos O&P, safety is priority nr one.

According to the Responsible Care Programme, we want to make sure that our products are transported and delivered in a safe way.

In order to achieve this, CEFIC (the Federation of the Chemical Industry in Europe) and ECTA (the transport sector) have developed guidelines for safe transport and loading/ unloading of chemicals.

The main ones which may be of interest to you are listed in the attached document.

Although these guidelines are not legally binding, these are considered by the Chemical Industry as Best Practice and are therefore to be considered as Industry Standard.

One element we want to pay special attention to is Safe Working at Height. In view of several incidents that were reported by Chemical Companies during the last years, about drivers that fell off their truck during sampling, we have introduced strict rules on Working at Height. These rules must be applied by all our logistics services providers including drivers and we would like to ask you to implement these as well as our drivers will no longer be permitted to go on top of their vehicles without adequate protection.

With adequate protection we mean.

- A life line to which a driver can clip is safety harness on
- A working platform which fully encloses the driver when going on top of his truck and which has a safe means of access (stairs)



But in the first place we want to ask you that, if a sample is required, to take a bottom sample instead of a top sample.

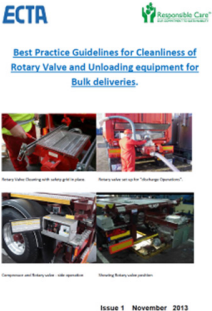

If you need any more information or advice, please contact our Account manager.

Kind regards

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Guidelines for customers to make bulk deliveries as safe as possible.

Name guideline	Front page	description	What is important for you in this document ?	Where to find it ?
<p>ECTA/ CEFIC: “Best Practice Guidelines for the safe working at height in the logistics supply chain and allied sectors”</p>		<p>What are the risks when working at height. What are the legal requirements and responsibilities of the different parties. How to do a risk assessment. Good and bad practices.</p>	<p>What are your responsibilities when a driver has to go on top of his truck for taking a sample ? How can this be done safely ? What alternatives are available (e.g. bottom sampling)</p>	<p>http://www.ecta.com/media/1524/working_at_height_nov_2012_rev_1.pdf</p>
<p>ECTA/ CEFIC: “Best Practice Guidelines for safe (Un)Loading of Road Freight Vehicles, covering Technical, Behavioural and Organisational aspects”</p>		<p>Safe loading and unloading of dangerous and non-dangerous goods. Applicable legislation. Emergency response. Technical info on hoses. A Behaviour Based Safety program in 4 levels. Responsibilities in loading/unloading operations. Communication between drivers and operators using Transperanto. SULID: The Safe (Un)Loading Information document.</p>	<p>Know your and the driver’s responsibilities during unloading operations regarding:</p> <ul style="list-style-type: none"> • making connections • sampling • operating unloading equipment <p>... Transperanto: a simple translation tool to communicate with foreign drivers. www.transperanto.org</p>	<p>http://www.ecta.com/media/2670/Best%20Practice%20Guidelines%20for%20Safe%20Loading%20and%20Unloading%20of%20Road%20Freight%20Vehicles%20December%202013.pdf</p>

<p>ECTA/CEFIC: “Best Practice Guidelines for Cleanliness of Rotary Valve and Unloading equipment for Bulk deliveries”</p>	 <p>ECTA Responsible Care</p> <p>Best Practice Guidelines for Cleanliness of Rotary Valve and Unloading equipment for Bulk deliveries.</p> <p>Issue 1 November 2013</p>	<p>This document covers the requirements for loading and unloading of Bag In Box containers (30’ containers with inner liner) in order to prevent contaminations. As these containers are loaded on a normal container chassis, the loading site cannot inspect the unloading equipment of the tipping chassis. Therefore dual checks by driver and unloading operator are important.</p>	<p>On top of the checks and inspections done by Ineos and the drivers, it is proposed that customers carry out a few checks themselves before starting the unloading. e.g.</p> <ul style="list-style-type: none"> • Check seal nrs on CMR and compare with seal nrs on the container. • Check cleanliness of hoses etc.. <p>These checks are described in the document.</p> <p>Also, a robust system should be in place to prevent that the product is unloaded into a wrong silo.</p>	<p>http://www.ecta.com/media/2659/Best%20Practice%20Guidelines%20Rotary%20Valve%20%20Associated%20equipment%20%20Issue%201%20November%202013.pdf</p>
<p>ECTA/ CEFIC “Best Practice Guidelines for the safe tipping of Silo trucks/ Trailers/ silo Containers and Bag-In-Box containers”</p>	 <p>ECTA cefic Responsible Care</p> <p>Best Practice Guidelines for Safe tipping of Silo trucks/ Trailers Silo Containers and bag-in-box containers</p> <p>Issue 1 September 2014</p>	<p>Despite the high safety requirements imposed on the tipping of bulk vehicles and containers, there are still, +/- 25 incidents per year in Europe whereby the vehicle/ container falls over during discharge. This document describes what can be done to prevent this kind of incidents. The basis is a risk assessment. The document includes requirements for unloading locations, vehicle design, unloading procedures etc. It gives guidance on how to do a risk assessment and shows examples of safe and unsafe practices.</p>	<p>The document describes how your unloading installation should look like e.g.</p> <ul style="list-style-type: none"> • Condition of the road surface • Unloading location away from truck traffic • Free overhead clearance • Etc... <p>The document also describes how tipping can be done safely and it includes a checklist that can be used by the operator to check whether safety requirements are met.</p> <p>There is an example how to do a risk assessment of the unloading facilities.</p>	<p>http://www.ecta.com/media/3079/ecta_guidelines_on_silo_tipping_equipment_issue_november_2014.pdf</p>

Other Ineos O&P Safety information can be found on: www.logisticsmatters.info

