

**SQAS 2022 Core Revised version 2**

**Questionnaire & Guidelines**

 

Version 13/01/23

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| **SQAS Core 2022 Revised version 2- Questionnaire & Guidelines - English version**  **New text with regard to 2019 version is in blue. New revised text is in green.**  **New text of version 2 is in red**  **(\*) The letter “M” in this column identifies a question corresponding to the OCS Mandatory requirements** | | | | **OCS (\*)** |
| **Item N°** | **Question** |  | **Guideline** |  |
|  |  |  |  |  |
| **1.** | **Management System and Responsibility** |  | **Management System and Responsibility** |  |
| **1.1.** | **Management Responsibility** |  | **Management Responsibility** |  |
| **1.1.1.** | **Company Policies** |  | **Company Policies** |  |
|  |  |  | **General note: In the SQAS questionnaires, the reference to a written policy, procedure or record does not mean that the information should be in hard copy. Electronic supporting evidence will be accepted.**  **The term “company” refers to a SQAS assessable unit as defined in item 2.3 of the SQAS/ESAD guidelines** |  |
| 1.1.1.1. | Does the company have a current written policy reflecting management's active commitment to: Safety & Health, Environment, Quality/customers’ requirements, Security, Behaviour Based Safety, Prohibition of drugs and Alcohol, Training development, Non-conformance reporting and Corporate Social Responsibility (CSR) requirements? |  | The policy statement(s) must be clear and unambiguous concerning management’s commitment to the safety of all operations, the health of the employees, the protection of the environment, the quality of the operations and services, the security (including Information Technology security) and meeting the customer's requirements at all times. There should be evidence that the policy is reviewed, kept up to date, communicated effectively to the employees and signed by the present managing director. If a policy topic is missing the assessor should indicate which one. All mentioned topics must be present in the policy to score YES.  BBS (or an equivalent programme) aims to increase safety during activities by positively influencing the behaviour of operators/drivers through observation, coaching, communication and feedback. BBS principles are applicable for every SQAS module. Details on BBS can be found in the guidelines of section 3.3 of this questionnaire. It is envisaged that BBS programs are an integrated part of the company SHE policy. Verify if specific reference is made in the policy to Behaviour Based Program (as described in the CEFIC/ECTA BBS guidelines, brochures or equivalent documents).  CEFIC guidelines can be found in this link : <https://cefic.org/library-item/behaviour-based-safety-guidelines-training-drivers-safe-driving-road-freight-vehicles> .  Verify if it is explicitly stated in the policy that the use or being under the influence of any drug or alcohol is prohibited during working hours.  For security: Protecting people, safeguarding the integrity of high value and hazardous products against loss by intentional destruction or theft. It also covers protection of digital information including proprietary information given into the custody of a logistic service provider. Verify whether the importance of these objectives is specifically mentioned in the policy.  CSR is a concept whereby companies integrate social, labour and human rights and governance, safety and environmental concerns in their business operations and in their interaction with their stakeholders (This is also valid for sustainable procurement). For more information about CSR see <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=COM:2011:0681:FIN:EN:PDF>   For Social: Fundamental human rights, working conditions and hours, non-discrimination, freedom of association , prohibition of people working under the minimum age required by law. Verify if these topics are specifically mentioned in the policy.   For Governance: Fair business/business ethics (e.g. anti-corruption and bribery, conflict of interest, fraud, money laundering, anti-competitive practices). Verify if these topics are specifically mentioned in the policy. | X |
| 1.1.1.2. | In case the company handles/transports or subcontracts handling or transport of pellets: |  | **All definitions related to pellet loss questions are included in the Annex at the end of this document.**  Very small particles of plastic/flakes/powder that are lost during transportation, handling, cleaning, or storage can have a negative impact on the aquatic environment if they reach rivers, lakes, or the sea. Pellets are produced in many colours. Plastic pellets are also known as “granules” or “nurdles” and are normally spherical or lenticular in shape. In some countries, plastic can also be termed “resin”.  See also Cefic /ECTA Guidelines "Safety and Quality Best Practice Guidelines for Unloading of Polymers in Bulk", item 5: <https://cefic.org/library-item/best-practice-guidelines-safety-quality-guidelines-for-unloading-polymers-in-bulk> |  |
| 1.1.1.2.a. | Has the senior management signed up to "Operation Clean Sweep" (OCS) programme? |  | OCS is an international programme designed to prevent the spill of plastics pellets (granulates, flakes) and powders and their loss into the environment during handling by the various entities in the plastics value chain.  <http://www.opcleansweep.eu/> . The assessor will check that the company is listed in this website.  To sign up for OCS the company should sign the OCS pledge:  "1. Improve worksite set-up to prevent and address spills  2. Create and publish internal procedures to achieve zero industrial plastic material loss  3. Provide employee training and accountability for spill prevention, containment, clean-up, and disposal  4. Audit performance regularly  5. Comply with all applicable state and local regulations governing industrial plastics containment  6. Encourage partners (contractors, transporters, distributors, etc.) to pursue the same goals"  By signing the pledge, the company will have its name listed on the OCS website.  See the definitions of “loss” and “spill” in the Annex  The assessor will look for written evidence that the OCS programme is a priority. | M |
| 1.1.1.2.b. | Has the company asked the applicable subcontractors to sign the OCS programme? |  | The assessor will score positively if the transport, site cleaning and waste collection companies involved in pellets handling activities are required to sign the OCS programme | M |
| 1.1.1.2.c. | Does the company inform and promote the OCS programme with its business partners (e.g. other service providers different from those mentioned in 1.1.1.2.b, suppliers, customers, recyclers) to encourage them to pursue the same objectives on pellet loss prevention? |  | The auditor will look for documentary evidence of this communication | M |
| 1.1.1.3. | Has the company developed a digitalization action plan? |  | The plan should include actions, responsible people, and due dates to develop digital solutions to enable the exchange of data in real time with customers and logistics suppliers. |  |
| 1.1.1.4. | Are senior managers sufficiently visible and engaged in carrying forward the SHEQ&Sec message? |  | Documents have to prove an active leadership by taking the lead in e.g. presentations, interventions, discussing HSSE in staff meetings as well as with (sub)contractors. Indicate what proof could be seen. | X |
| 1.1.1.5. | Does the line management interact and constructively encourage employees to be actively engaged in SHEQ&Sec performance improvement? |  | There should be evidence in senior and middle management communication and meeting reports of following items :  - encouraging staff and contactors to show involvement in SHEQ&Sec issues  - the follow-up of HSSE metrics against HSSE target like incidents, near misses, occupational illness case analysis. Those should also be consequently discussed in the appropriate committee(s). |  |
| **1.1.2.** | **Roles & Responsibilities** |  | **Roles & Responsibilities** |  |
| 1.1.2.1. | Is there an organisation chart and associated job description defining each individual's role within the organisation, including their responsibilities for SHEQ&Sec and CSR? |  |  | X |
| 1.1.2.2. | Does the organisation chart include a responsible person(s) to manage digitalization? |  | As minimum requirements, those in charge will oversee and manage digital projects, data security, procedures, and compliance with GDPR regulation. This service could be outsourced but the responsibility will remain with the responsible person of the company. |  |
| **1.1.3.** | **Legislation and other requirements** |  | **Legislation and other requirements** |  |
| 1.1.3.1. | Is there proof available that the company stays abreast of all relevant legislation and legislative developments in the area of SHEQ&Sec and CSR and are persons formally designated or a source defined? |  | Look for documentary evidence in the form of an up to date register of relevant legislation. At a minimum this includes environmental laws, safety and health regulations, corporate social responsibility and other applicable regulations. Focus on changes in legislation. Ask the company for examples of changes in legislation which happened during recent years if a new assessment, and the last 3 years if a re-assessment, and check how the company implemented them. If (a) person(s) is (are) formally designated, this responsibility should be clearly described in a job description. If an external source is used, there should be clear evidence of a contract, exchange of letters or some other form of written understanding, specifying the service to be provided, when and to whom within the Company.  EU Directive: 89/391/EEC Art. 7 (Health and Safety) |  |
| 1.1.3.2. | Is there a written procedure present which describes how legislative changes as detailed in the register of legal requirements are communicated and implemented in the company? |  | Look for documentary evidence of communicated and implemented changes in the various applicable SHEQ&Sec & CSR management system documentation and registrations. Look also for communication/ information to (relevant) employees.  EU Directive: 89/391/EEC (Health and Safety) The company should ensure that its employees stay abreast of the regulations concerning the products transported/handled. Customers and suppliers should be involved. EU Directive 98/24/ EC Art. 8 and amendments. |  |
| 1.1.3.3. | Is a regular review made of the system for compliance with legal requirements ? |  | Look for evaluation documents and follow up of identified actions if any. This evaluation should be detailed towards new/adapted legislation and changes in operations. |  |
| 1.1.3.4. | Does the Dangerous Goods Safety Advisor produce an annual report to Management on the Companies' activities in the transport of dangerous goods, in accordance with legal requirements and within six months after year end? |  | Check that the Dangerous Goods Safety Adviser has produced an annual report by 1 July (Industry requirement). The report summarizes the Company’s activities concerning the transport of dangerous goods for the previous calendar year. Score "1" if the report is on time and in compliance with the legal requirements. Score "N/A" only if no dangerous goods are transported or loaded. Score "0" if the activity includes the transport or loading of dangerous goods and no report is available before 1 July, even if there is no legal obligation. EU Directive 2008/68/EEC - ADR 1.8.3. |  |
| 1.1.3.5. | In case the company handles/transports plastic pellets: |  |  |  |
| 1.1.3.5.a. | is there a process for informing the regulatory bodies (where regulations require it) if a pellet loss happens? |  | The assessor will look for evidence of communications to regulatory bodies, if applicable. | M |
| 1.1.3.5.b. | is there a process for internal and external communication about the pellet loss programme progress? |  | The organization shall develop, document, maintain and communicate a process or processes for internal communications on pellet loss prevention to all personnel.  The assessor will score positively if at least the customers are informed, and the information is publicly available (e.g. in the company website).  The organization shall retain documented information as evidence of these communications. | M |
| **2.** | **Risk management** |  | **Risk management** This section includes Safety, Health, Environment, Security & CSR risk management and regulatory compliance systems |  |
| **2.1.** | **Risk assessment and mitigation measures** |  | **Risk assessment and mitigation measures** |  |
|  |  |  | Risk management is the identification, assessment, and prioritization of risks followed by coordinated application of resources to minimize, monitor, and control the probability and/or impact of unfortunate events. A documented system should be in place to identify all risks associated with the company operations; the risk assessment should meet the requirements of statutory legislation as well as operational risks that are not covered by applicable legislation. The assessment to identify and reduce risks should be supported by implementation of an action plan, this will make the potential risks identified and measurable over a period of time in the operations. The system should take into account all risks of possible accidents, incidents or releases to the environment, which may cause human and/or environmental exposure. The risk assessment and management system should examine the following questions: - what are the hazards? - what can go wrong? - what is the probability that something will go wrong? - what is the potential impact on people, property and the environment? - what measures should/can be taken to reduce the identified risks as much as possible? - is medical care available and ensured in case of emergencies?  Risk management should be regarded as a continuous process. The process should be repeated at regular intervals, based on practical experience and incident evaluation. High risk activities should receive more frequent reviews. A risk assessment should also be carried out each time there is a significant change in the operational activities (e.g. handling of new products, use of new equipment, changes in operating procedures). New projects should be evaluated at an early stage. The risk assessments for new projects should be carried out in close co-operation with the chemical suppliers.  EU Directive: 89/391/EEC Art. 9 |  |
|  |  |  | The "Best Practice Guideline for Safe (Un)Loading of Road Freight Vehicles" <https://cefic.org/library-item/best-practice-guidelines-for-safe-un-loading-of-road-freight-vehicles> provides additional information for use by the assessed company, regarding: interfaces at loading and/or unloading; SULID; Non Standard Operations (NSO); egress and access; use of couplings; and many more. The assessor can also use this information as guidance to evaluate any possible major risks linked to the activities of the assessed company. Further reference is made to Annex 7 of the above mentioned Best Practice Guideline. In case of an assessment of a Transfer Terminal, the risks described in the "Cefic/ECTA Guidelines on Safe Storage and handling of containers carrying dangerous goods and hazardous substances" must be taken into account: <https://cefic.org/library-item/safe-storage-handling-containers-carrying-dangerous-goods-hazardous-substance> |  |
| 2.1.1. | Is there a process to assess and document the Safety, Health, Environmental, Security risks and working conditions, related to all activities of the company, considering following aspects? |  | To score this question the assessor:  - will check the documentary evidence presented by the company at the beginning of the assessment  - recheck at the end of the assessment. If any of the risks is not correctly managed, the score of this question will be zero.  To score a ‘yes’, a documented system (check for a matrix/schedule detailing ALL operational activities) should be in place (see main comment above) to assess and manage the risks of both existing and new operations. Check if the process of risk assessment is repeated at regular intervals (at least annually) for existing operations and takes into account practical experience obtained during the operations and from incident evaluations. Check if a risk assessment has been carried out each time there has been a significant change in the operational activities and for every new project. Check the risk assessment report of two recent new activities or projects.  In case of transport companies, refer to the Cefic guidelines "Guidance on Safety Risk Assessment for Chemical Transport Operations". As a minimum the sections 5 "Qualitative Analysis" (risk matrix) and 6 "Accident scenarios with potential high consequences" has to be taken into account. |  |
| 2.1.1.a. | start-up of new operations/activities (e.g. new products, new routes) ? |  | The assessor should identify any new products recently carried, stored, handled or cleaned and at the same time any new routes that products are transported over. These activities should be verified by a risk assessment. The auditor should ask to see the DGSA report (if required) that assesses the safety and environmental impact of new products before carriage or new services that are planned. EU Directive 98/24/EC and amendments. |  |
| 2.1.1.b. | change of operations/activities (e.g. new products, new routes) |  | From conversation with auditees identify any work practice changes. Refer to the guidelines about management of change (MOC): "Managing Change in a Chemicals Supply Chain": <https://cefic.org/library-item/guidelines-for-managing-change-in-a-chemicals-supply-chain/> or equivalent. Look for records of the risk assessment as indicated in section 5 of the guideline or equivalent. |  |
| 2.1.1.c. | periodic review of risks on current activities? |  | Current activities can be influenced by changing circumstances, legislation or incidents that happened. Critical tasks should be reviewed annually, non-critical every three years. The assessor should check that the scope of the revision is in line with the activities defined in the PAD. |  |
| 2.1.1.d. | identification of potential **spillages/losses** of plastic pellets in case the company handles/transports them? |  | Risk assessments should include documentation of pellet handling activities within the facility to identify the potential for spills, leaks and losses and their potential impact. The assessment should identify high risk areas and pathways to the external environment and include measures, equipment and procedures for prevention, containment and clean-up.  A risk minimisation plan to prevent and address spills including responsibilities, actions, changes to infrastructure , equipment and timing shall be implemented and kept updated. It will establish preventive, containment and cleaning/reaction measures, protocols and or procedures.  The risk analysis must be periodically reviewed and kept updated. It shall contain:  a) **Locations /processes/activities/** where a pellet spill/loss can occur  Examples:  - A transport company could identify pellets:   * in or on the transport unit after the loading/unloading operation that have a risk of falling off after the truck leaves the site * falling off the trailers in its cross-docking facility during loading/unloading operations   - A tank cleaning station could identify a place where there is a risk of pellets spill while opening the tank lids.  - A Warehouse could identify that there is a risk of pellet spill during debagging operation.  b) The facility will have a map identifying the points where pellet spills can happen. The assessor will use the map when visiting the site.  c) A **root-cause analysis** of the process to assess where and during which operation a spill/loss of pellets, powder or flakes may occur.  d) The assessment of the **likelihood** of a spill/loss and its magnitude to assign the appropriate priority and “risk ranking”.  Qualitative or quantitative risk assessment methods can be used. | M |
| 2.1.1.e. | identification of potential generation of plastic dust in case that the company handles/transports pellets? |  | Dust is difficult to clean up and the focus should be put on avoiding its generation. | M |
| 2.1.2. | If company has site activities: Are the physical boundaries of the OCS programme, including areas surrounding the site, defined and documented? |  | Any surrounding area that might be impacted by losses of pellets from the site-activities shall be considered part of the site-OCS program (e.g. loss of pellets that fell off trucks on the roads and roundabouts outside the site after loading or discharge). Communal surroundings that are included in a communal OCS program (that is to say, an OCS program not managed by the assessed company) such as port- or industrial zone programs are exempted. | M |
| 2.1.3. | Is there a risk minimization plan to prevent and address spills/losses of plastic pellets and their recurrence? |  | The plan should include responsibilities, actions, and due time. It shall be implemented and kept updated. It will establish preventive, containment and cleaning/reaction measures, protocols and or procedures.  The folowing hierarchy of measures (layers of protection) shall be taken into account when devising procedures:   1. Avoid unnecesary handling 2. Best practices for handling/tools/procedures 3. Containment 4. Cleanup/mitigation   The protocols and or procedures will include the equipment needed to address spills/losses. Records shall be kept.  The plan should cover spills/losses generated by plastics pellets and plastic dust and/or plastic powder.  See OCS Manual <http://www.opcleansweep.eu/wp-content/uploads/2013/04/OCS_Manual_EU_ENG_2015.pdf> | M |
| 2.1.4. | Are measures taken to control/mitigate all identified risks ? |  | It should be checked whether the company has taken appropriate measures to mitigate the risks identified in the risk assessment as much as possible, e.g. by: - adequate operating written procedures - selection of appropriate equipment - route selection - appropriate training - emergency response arrangements - adequate collective and personal protective equipment EU Directive 89/391/EEC Art. 6. Reference to the guidance "Responsible Care Security Code", item 2.5. This guidance could help to identify points to assess <https://www.rcsk.sk/mix/Responsible%20Care%20Security%20Code%20-%20Guidance.pdf> |  |
| **2.2.** | **Safety** |  | **Safety** |  |
| 2.2.1. | Personal Protective Equipment (PPE) |  | **Personal Protective Equipment (PPE)** |  |
|  |  |  | Please note that this section deals with PPE used by "OWN Personnel" and fully integrated subcontractors. The controls over PPE of contract-personnel are covered in the section on subcontracting. |  |
| 2.2.1.1. | Is there a written procedure defining what PPE has to be used under what circumstances? |  | A very clear and comprehensive document, in accordance with the risk assessment, is expected to be available, defining in detail what PPE has to be used under what circumstances taking into account the instructions from the customers. Scrutinize in detail! In case of a transport service assessment, the Driver Manual can be accepted as “a very clear and comprehensive document”, if it complies with these requirements. The assessor should focus on the actual knowledge of the employees in the use of PPEs. Findings in documents (positive or negative) must always be checked with drivers/operators through interview. Score 1 if the interview provides positive evidence. If records are clear but the interview provides negative evidence, score 0. In these cases, it is recommended to add a comment explaining the score. In addition each operating procedure or instruction should specify what PPE, including any training, should be used for each specific operation or product specific training requirement. EU Directive 89/391/EEC Art.9. In case of transport companies, the PPE has to comply, as a minimum, with the standards indicated in the section 10 of the "Best Practice Guidelines for Safe (Un)Loading of Road Freight Vehicles", unless local legislation has additional requirements. PPE selection must be clearly based on chemicals handled and activities performed. Instruction of customers are not always sufficient and should be evaluated by the carriers. |  |
| 2.2.1.2. | Is the PPE regularly checked (before use and at set intervals) and replaced when required? |  | The checking of equipment should be documented, with indication of the inspection date, name of the inspector and comments. The auditor should ask to see an issue register for PPE to employees, this can then verify re-issue of defective PPE equipment. The register should also show the frequency of checks on PPE to verify condition. |  |
| 2.2.1.3. | Are instructions and training provided when category III PPE or other specific precautions are needed and used? |  | Examples from type III PPE are: self-contained breathing apparatus, filters, pressure suits, harnesses, … For specific chemicals such as PEG in case of phenol handling, calcium gluconate in case of Hydrofluoric acid handling etc. special precautions and training are needed. Regulation (EU) 2016/425 - 89/391/EEC |  |
| **2.3.** | **Health** |  | **Health** |  |
| 2.3.1. | Are current Safety Data Sheets, available on site from the manufacturers for all products transported and/or handled? |  | A product acceptance written procedure should be in place asking for the product safety data before the product is handled. Product safety data should be supplied by the consignor/manufacturer and maintained as current at all times, including compliance with REACH/CLP by the consignor/manufacturer. Check the accessibility of this information at the site (e.g. a file with the Safety Data Sheets of all the products transported or handled). Check at random the available information for a few products.  For distributors, SDS will also include those for products diluted and blended on site. |  |
| 2.4. | Security |  | Security |  |
| 2.4.1. | Protection of property and people |  |  |  |
| 2.4.1.1. | Is there a system to monitor entry, exit and to limit access to restricted areas of all personnel and visitors through positive identification? |  | Give a positive score for any effective control method, e.g. security guard, electronic card entry system, registered entry, etc. Limited access to restricted areas should be in place. Reference to the “Responsible Care Security Code", item 3.1. The guidance could help to identify points to assess. <https://www.rcsk.sk/mix/Responsible%20Care%20Security%20Code%20-%20Guidance.pdf> |  |
| 2.4.1.2. | Is there a written procedure in place, requiring documented periodical inspections, to identify breaches in the security of the buildings/premises? |  | Check the availability and the use of periodic inspection sheets or security check lists and verify the reporting of incidents and its remediation. |  |
| 2.4.1.3. | Has the company evaluated the risk of unauthorized entrance (including refugees) to company premises, transport equipment, tank cleaning facilities, storage areas or information processing facilities on site? |  | This risk of unauthorized entrance of refugees should be evaluated even if the company is not in a "hotspot".  Cross country borders and routes used by refugees should be taken into account. Security perimeters have to be defined and used to protect areas that contain either sensitive or critical information and information processing facilities (i.e. the room where IT servers are kept). |  |
| 2.4.2. | Protection of data in digital form |  |  |  |
| 2.4.2.1. | Has a risk assessment been conducted in the last twelve months, as a minimum frequency, regarding data on customers, products and operations and are measures taken to mitigate identified risks? |  | Verify that the risk assessment has been undertaken. Verify that the company has implemented protection measures on data, e.g. on EDI links, order processing and use of customer order details on an Internet site. EDI (Electronic Data Interchange) is the computer-to-computer exchange of business documents in a standard electronic format between business partners. If this task is outsourced, the assessor will ask for the contract with the supplier and will check that the subjects mentioned below are covered. At least, the following risks must be taken into account to protect data: - Hacker attacks  - Infectious malware (software which is specifically designed to disrupt, damage, or gain authorized access to a computer system)  - Security of business information on mobile devices (portable PCs, Tablets, cellular phones, etc.). |  |
| 2.4.2.2. | Is there an inventory of Information Technology assets containing confidential company data? |  | Assets include hardware (any device that can keep data, like laptops, mobile phones, cameras, etc.) and software that handles information. An inventory of these assets must be drawn up, maintained and kept up to date. Equipment and assets off-premises have to be included. |  |
| 2.4.2.3. | Is there a proactive maintenance program on Information Technology assets handling information technology? |  | The maintenance program has to be designed according to the supplier's recommended service intervals and specifications. It should include hardware and software. Records must be kept. |  |
| 2.4.2.4. | Is the information system audited at least annually by an independent auditor to ensure that all defined criteria are being met? |  | Examples of acceptable audits are those related to certification against ISO 27001 or audits by insurance IT auditors. If the auditor is internal, he/she should be independent of the development/ maintenance of the IT system. An internal auditor belonging to the IT department is not considered independent. |  |
| 2.4.2.5. | Is a system in place to ensure that communication dialogue and information exchange on security issues is appropriate? |  | Check how security threats are communicated to employees and contractors. The system should include information to employees and management when the threat level changes.  A system to exchange information with local / national law enforcement agencies should be in place. Refer to "Responsible Care Security Code" guidance, section 5. |  |
| 2.4.2.6. | Is a system in place to ensure that response to security threats and incident are defined? |  | Check reporting and action plans for security incidents / threats. Refer to "Responsible Care Security Code" guidance, section 6: <https://www.rcsk.sk/mix/Responsible%20Care%20Security%20Code%20-%20Guidance.pdf> |  |
| **2.5.** | **Fair business practices** |  |  |  |
| 2.5.1. | Has the company formalized the fair business practices? |  | To score positively, the following mechanisms have to be covered: Risk assessment on business ethics conducted on the upstream supply chain to define policies, communication of Code of Ethics/business ethics policy to all employees, communication of Code of Ethics/business ethics policy to business partners (e.g. suppliers). |  |
| 2.5.2. | Are there mechanisms in place to ensure effective implementation of the anti-corruption and bribery policy (including for instance: conflict of interest, fraud, money laundering)? |  | To score positively, the following mechanisms has to be in place: signature acknowledgement of anti-corruption policy required for all concerned employees, specific approval written procedure for sensitive transactions (e.g. gifts, travel), specific procedures for retaining and using third-party intermediaries (i.e. due diligence, certifications), structured mechanisms to deal with policy violations (e.g. potential sanctions), secure communication channel for employees to seek advice or voice concerns (e.g. hotline, whistle blowing procedure), internal audit on compliance with anti-corruption and bribery policy, internal controls (e.g. four eyes principle, separation of functions, job rotation). To score positively, the company should have established effective and appropriate internal controls to identify and prevent corruption (e.g. multiple-eye principle, specific approval procedure for sensitive transactions (e.g. financial benefits). |  |
| 2.5.3. | Are there mechanisms in place to ensure effective implementation of the anti-competitive practices policy? |  | To score positively, the following mechanisms has to be in place: signature acknowledgement of anti-competitive practices policy required for all concerned employees, structured mechanisms to deal with policy violations i.e. potential sanctions, awareness or training program on anti-competitive practices (e.g. cartels, price fixing, bid rigging), internal audit on compliance with anti-competitive practices policy. |  |
| **2.6.** | **Environment** |  |  |  |
| 2.6.1. | Is the classification, storing, segregation, identification, protection and final destination of any generated waste, done according to legal regulations and only by legally approved waste management companies? |  | All wastes: general, non-hazardous and hazardous have to be classified, stored, labelled, segregated, protected from rain (if applicable) and disposed of in a safe, practical and legally compliant manner through persons, organizations and sites with the correct licenses, where legally required. The assessor has to check that waste disposal records are retained as per legal requirements. Waste carriers, dealers and brokers should provide evidence of correct registration or authorization.  The route of disposal and final destination of the waste should be ascertained. Samples that do not need to be stored anymore and any used packaging material generated on site are also considered waste. |  |
| 2.6.2. | Has the company carried out a risk assessment taking into account the impact of company activities on soil and groundwater contamination? |  | Look for documentary evidence. In many countries periodical soil monitoring is necessary: check the last report. Check that preventive/corrective measures have been implemented, if the risk identified is not acceptable. |  |
| 2.6.3. | Is plastic waste not sent to landfilling? |  | Landfilling of plastic waste is not considered a sustainable practice. Plastic materials could be recycled, resold, or send to incineration (with energy recovery) or used as alternative fuel (e.g. in cement kilns). | X |
| 2.6.4. | Is a programme in place to measure and to reduce pro rata the waste generated by the company activities? |  | An effective system should be in place for measuring and reducing the waste of the company, e.g. waste oil, scrap metal, old batteries, cargo residues, waste water, etc. |  |
| **3.** | **Human Resources** |  | **Human Resources** |  |
| **3.1.** | **Recruitment** |  | **Recruitment** |  |
| 3.1.1. | Is there a written recruitment procedure which takes into account relevant experience, competence and education for all employees, including temporary staff? |  | Score "1" only if there is a written recruitment procedure for all functions and proof of the application of this procedure. Employees with different functions in the company should be checked. |  |
| 3.1.2. | Have all operating personnel (drivers, operators, etc.) undergone a periodic medical examination where required by law or by the risk assessment of the job? |  | Check for evidence that all relevant operating personnel have undergone such a periodic medical examination. This examination should be adapted to the risks inherent to the tasks of the operators. If the law allows operating personnel to refuse a medical examination, check that any consequential legal requirements are fulfilled; in this case the score will be zero with a mandatory comment from the assessor. |  |
| 3.1.3. | Is there a written grievance and disciplinary procedure? |  | Grievance is a complaint by an employee about an action, which his employer has taken or is contemplating taking in relation to him. The grievance and disciplinary procedure should be a written one and communicated to all employees. It should include what actions are required for raising a grievance and what sanction will be applied in different cases and should focus on SHEQ&Sec and CSR . Verify by asking a sample of employees the content of this procedure. |  |
| **3.2.** | **Training** |  | **Training** |  |
|  |  |  | If fully integrated subcontractors are used these drivers/operators should be included. |  |
| 3.2.1. | Is there a training programme in place for all personnel that results in an individual training plan and are records available that the training plan has been implemented? Is the training plan reviewed annually? |  | A training programme is the overall procedure on training. A training plan is the output list of training to be followed. This question is about the programme and plan, but the implementation has to be in compliance with local legislation. For new employees, the programme shall include an induction training.  In case that the company handles/transports plastics pellets, the organization shall determine the training needs associated to the OCS programme. A training programme will cover the needs based on the employees’ specific roles and responsibilities and will include a training schedule. The organization shall provide a training programme for all relevant personnel working on facility, including non-pellets handling roles, that will result in individual training plans.  The auditor will ask for an organigram, will select some employees and will ask for the description of their roles and responsibilities and verify the employees’ training needs associated to the OCS programme.  Look for up-to-date training records and individual proof of the implementation of the training programme. If the training programme or training plan could not be followed, clear evaluations should be available to explain the discrepancies in combination with corrective actions. EU Directive: 89/391/EEC Art. 10.  Some tasks/activities may require a specific knowledge, experience or education. Discuss whether a conscious effort has been made to assign qualified people for specific (technical) aspects of the business, where required. The risk analysis is a basic document to identify such tasks. | M |
| 3.2.2. | Are the following subjects being trained? |  | Check at random a sample of training records to confirm that the subjects mentioned under sub-questions a to n are covered. The extent of this training should be in relation to the risks that the different employees are faced with and which are identified in the risk assessment, as mentioned in question 2.1.1. Frequency of the training depends on risk assessment and the employees individual performance but all subjects mentioned in the sub-questions have to be covered on a maximum five years cycle. EU Directive: 89/391/EEC Art. 10 The "Best Practice Guideline for Safe (Un)Loading of Road Freight Vehicles" <https://cefic.org/library-item/best-practice-guidelines-for-safe-un-loading-of-road-freight-vehicles> can be used to define in more detail how the training programme for LSP's is set up. |  |
| 3.2.2.a. | incident reporting, investigation, and analysis? |  | The training programme should cover responsibilities, notification processes, classification, and root cause analysis. In order to determine who will be trained and the extension of the training the Cefic/ECTA/Fecc "Guidelines for investigating logistics incidents and identifying root causes" could be used  <https://cefic.org/library-item/guidelines-for-investigation-logistics-incidents-identifying-root-causes-en> |  |
| 3.2.2.b. | dangerous goods handling? |  | Score "N/A" if no dangerous goods are handled. To score a "1" training must cover at least all legal requirements linked to the areas of the company's scope, e.g. ADR, ADN, RID, IMDG, GHS~~,~~ etc. EU Directive 98/24/EC Art. 8 and ADR 1.3. |  |
| 3.2.2.c. | specific product or handling needs? |  | Not only dangerous goods could present dangers but also other products or handling can cause certain risks. Giving training on these issues should be a part of the prevention measures mentioned in the risk analysis. |  |
| 3.2.2.d. | use of PPE (Personal Protective Equipment)? |  | The training programme should cover the company PPE policy, and the use and replacement of equipment. Training program/records must explicitly show the content of the program. Focus on the actual knowledge of the employees in the use of PPE. The PPE used have to be in line with the risk assessment carried out. Findings in documents (positive or negative) must always be checked with drivers/operators through interview. Score 1 if the interview provides positive evidence. If records are clear but the interview provides negative evidence, score 0. In these cases, it is recommended to add a comment explaining the score. |  |
| 3.2.2.e. | company emergency written procedures? |  | The training programme covering emergency procedures should include practical as well as administrative aspects. |  |
| 3.2.2.f. | spill prevention and control of liquids and solids not including plastic pellets? |  | The training should include loading and unloading procedures and the actions required by operators and drivers in the event of a spillage. In the case of intermodal transport, an important aspect of the control also concerns the check on all openings e.g. manlid and valves for no leaks, integrity of the tank during the transit, which includes the check on the Interface locations, like rail terminals and seaports. The driver has to check when a container is picked-up or dropped-off.  Training and awareness about plastics pellets is addressed in 3.2.2.n. |  |
| 3.2.2.g. | Behaviour Based Safety (BBS) principles? |  | Training covering BBS should be in alignment with principles as described in CEFIC/ECTA BBS guidelines: "Behaviour Based Safety Guidelines for training of drivers and safe driving of road freight vehicles" and "Best Practice Guideline for Safe (Un)Loading of Road Freight Vehicles"or equivalent and include at least: observation, key performance indicators, individual performance and re-training. See <https://cefic.org/library-item/best-practice-guidelines-for-safe-un-loading-of-road-freight-vehicles>  It is recommended that non-transport companies proactively implement their own BBS Plan, based on the principles of equivalent programmes in Transport. |  |
| 3.2.2.h. | security awareness proportionate to the risk and their role within the business (Security of information should be included)? |  | Security awareness training shall address the nature of security risks, recognizing security risks, methods to address and reduce such risks and actions to be taken in the event of a security breach. It shall include awareness of security plans (if appropriate) according to the responsibilities and duties of individuals and their part in implementing security plans. Training program/records must explicitly show the content of the program. In the case of transport companies, their planners and drivers must be interviewed.  Training in information security will include as a minimum: the importance of secure passwords, relevance of accurate business data and improper data loss, phishing.  The assessor has to focus on the actual knowledge of the employees about the risk aspects mentioned in the guidelines (e.g. protection of information, and goods).  Findings in documents (positive or negative) must always be checked with employees through interview. Score 1 if the interview provides positive evidence. If records are clear but the interview provides negative evidence, score 0. In these cases, it is recommended to add a comment explaining the score. |  |
| 3.2.2.i. | risk Assessment and risk Management? |  | In case of transport companies, consult the "Guidance on Safety Risk Assessment for Chemical Transport Operations". Specific reference is made to Annex 1 of the "Best Practice Guideline for Safe (Un)Loading of Road Freight Vehicles". Identify the persons in the company who carry out risk assessment: Safety/Environment/Security responsible, planners, etc.: have they attended trainings in risk assessment? In case of transport companies, expect the drivers trainings to be provided at operating and practical level. |  |
| 3.2.2.j. | communication skills? |  | Drivers, operators and, where applicable, other employees shall have knowledge of the applicable expressions in English. Refer to section 6 of the "Best Practice Guidelines for Safe (Un)Loading of Road Freight Vehicles". <https://cefic.org/library-item/best-practice-guidelines-for-safe-un-loading-of-road-freight-vehicles> |  |
| 3.2.2.k. | all aspects related to prevention of bribery and corruption? |  |  |  |
| 3.2.2.l. | training in awareness of fatigue and tiredness? |  | This question applies to all operational personnel who could be affected by fatigue and/or tiredness.  "Fatigue" in the understanding of this question is meant as deterioration in mental or physical performance due to prolonged physical or mental work - it occurs even in people who have had adequate sleep. All that may be needed to recover from fatigue is a rest from this work, or a change in activity ("a change is as good as a rest"). Sleep may not be needed if adequate sleep has already been taken.  "Tiredness" or sleepiness is the likelihood of falling asleep, due to inadequate sleep, prolonged wakefulness, or working through the night. |  |
| 3.2.2.m. | company ethics policy / code of ethics? |  |  |  |
| 3.2.2.n. | - awareness and accountability for spill/loss prevention, containment, clean-up, and disposal of plastics pellets,  - written procedures to prevent, contain, clean-up and dispose spills/losses,  in case the company handles/transports plastic pellets |  | Anybody involved in transportation and or handling of plastics pellets should understand that plastic spills are as bad as chemical spills. Consequences of plastics spills are less immediate, but they last much longer in the environment:  - Training of employees shall include theory and practical hands on exercises  - Subcontractors and external workers on site should be included in the awareness programme, as a minimum requirement. External organizations for which the subcontractors are working are responsible for ensuring the competence of their personnel. If drivers and/or and external workers on site are present during the visit, the auditor will interview them to verify the implementation of the training plan | M |
| 3.2.3. | Are employees informed about the evolution of the company’s OCS programme? |  | Records of the information provided to employees will be kept. | M |
| 3.2.4. | Are employees encouraged to provide feedback on the company’s OCS programme to the line management? |  | Records of the communication will be kept. | M |
| 3.2.5. | Is a first aid training programme defined for identified persons and implemented? |  | Verify even if not regulatory required, that the first aid training programme is documented and implemented (including a refresher training). Check for participants and frequency. If required by legislation: verify the compliance in addition to the above. The assessor must identify in the comments if the first aid of the assessed company is covering a) an office set up only, or b) an operating site. |  |
| 3.2.6. | Are variances from the plan effectively followed up? |  | Example: illness or unexpected absences for any other reasons. New hires and job rotation shall also be considered. |  |
| 3.2.7. | Is the effectiveness of the training checked for each employee? |  | Proof has to be available that shows that the effectiveness of the training was checked. This can be a test after the training, an evaluation of the work of the employee a certain time after the training, an output measurement of the performance of the employee. |  |
|  |  |  |  |  |
| **3.3.** | **Behaviour Based Safety (BBS)** |  | **Behaviour Based Safety (BBS)** |  |
|  |  |  | BBS guidelines already exist "Behaviour based safety guidelines for training of drivers and safe driving of road freight vehicles " and "Best Practice Guidelines for Safe (Un)Loading of Road Freight Vehicles", section 1: <https://cefic.org/library-item/best-practice-guidelines-for-safe-un-loading-of-road-freight-vehicles>  It is recommended that non-transport companies proactively implement their own BBS Plan, based on the principles of equivalent programmes in Transport. |  |
| 3.3.1. | Has a BBS implementation plan, or an established programme, been set up with targets, resourcing and timeline? |  | Check for a documented implementation plan or an established programme including targets and up to date status mentioning results. The targets could be included in the general objectives of the company. If there is any doubt, assess this question after assessing the BBS section of the specific SQAS modules.  In the case of Transport Service and Warehouse assessments the "Best Practice Guideline for Safe (Un)Loading of Road Freight Vehicles", Part A, chapter 1, should be taken into account to determine the level of implementation of the 4 BBS levels given in the Guideline. Assessed companies that are not directly involved in (Un) loading of road freight vehicles could use the guidelines to have an equivalent programme in place to evaluate this level on implementation. The assessor should record in comments the BBS level that the company has in place. | X |
| 3.3.2. | Have the respective responsibilities of all personnel in the implementation of BBS been identified ? |  | Look for role descriptions referring to the following responsibilities in relation to BBS. Management are mainly responsible for the implementation and ongoing support of the BBS program. They should have defined roles, delivered resources, and removed barriers to a successful implementation, with results monitored against targets. Administrative personnel should understand and support the BBS program in order to avoid / eliminate planning and instructions which may be in conflict with the BBS principles. Trainers do not only execute the BBS training but they also collect data and report the results to management. All staff should understand the purpose of the BBS program, be positively committed to participate and accept preventative changes as a result of the BBS findings and analysis. |  |
| **3.4.** | **Labour Policy and human rights** |  |  |  |
| 3.4.1. | Are specific mechanisms in place to ensure effective implementation of your company's Career Management and training policy? |  | The following mechanisms should be in place: Transparent recruitment process (communicated clearly and formally to all candidates), regular assessment (at least once a year) of individual performance, setting of Individual development and career plan for all employees, official measures promoting career mobility, policy to give priority to internal recruitment, provision of skills development training, official measures to anticipate or reduce layoffs and associated negative impacts (e.g. financial compensation, outplacement service). |  |
| 3.4.2. | Are specific mechanisms in place to ensure effective implementation of your company's non-discrimination policy |  | The following mechanisms should be in place: company public commitment to avoid discrimination (e.g. colour, race, gender, religion, ethnic, social), company proactive measures to avoid discrimination during recruitment phase, company specific awareness and training programs for managers, company specific targets (exceeding legal requirements) to employ disabled people, work conditions and provision of work stations adapted to disabled, company specific measures to promote gender equality in the workplace (i.e. network groups, programs for advancement of women, equal pay, etc.), whistle blowing procedure (employee's report of suspected wrong doing at work) or disciplinary measures enforced. |  |
| 3.4.3. | Are specific mechanisms in place to ensure effective implementation of the company's policy about child labour? |  | If there are legal requirements covering this subject, the company must comply with them. If there are no legal requirements the following apply: No children below the age of 14 or 15 years should work except for apprentices, summer jobs, school or education. It must be ensured that young workers below 18 are not harmed with regard to health, safety, security or moral. The combined hours of transportation (to and from work and school), school attendance and work have to be less than 10 hours a day. The assessor has to record the age of the youngest employee at the site or office assessed. |  |
| 3.4.4. | Does the company ensure that no forced, bonded or involuntary prison labour is employed? |  | No guidelines. |  |
| **4.** | **On/Off Site Emergency Preparedness and Response** |  | **On/Off Site Emergency Preparedness and Response Where a Transport Service, ESAD distributor or Rail assessment is taking place, both On Site and Off-Site emergency response (ER) plans will be required. For other service providers only the On-Site ER plan will be demanded.** |  |
| 4.1. | Is there a written plan for dealing with on-site and off*-*site emergencies and potential crises?  Note: Text underlined is only applicable when an off-site ER plan is required, on top of the ER plan on-site |  | The written emergency plan should cover **all applicable scenarios**, all items indicated in 4.2 and shall be regularly updated. In case that the company handles or transport plastic pellets the scenarios to be considered should include an accident involving a loss of pellets into the environment. This should be treated as an emergency.  Check if all the described arrangements are in place. Verify if individuals understand their specific responsibilities in case of an emergency. The emergency response plan should also contain any customer specific contacts on a 24/7 basis. An emergency may turn into a crisis. Check that this crisis plan is part of the emergency plan.  This question is also applicable for service providers that only subcontracts other companies. The service provider can forward the requirements to their subcontractors, but it is their responsibility to test or check whether their subcontractors are able to deal with emergencies as defined. The assessor should look for a written plan detailing the response by the company (or a contracted company) similar to ICE Level 3 response. This ER Plan must be able to cater for the recovery of damaged equipment, the recovery of product and the containment and mitigation of any spill. This service may be undertaken by an external 3rd party emergency responder who has been formally appointed*.* | M |
| 4.2. | Does this written plan contain the following information? |  |  |  |
| 4.2.a. | individual responsibilities? |  | The assessor should check that responsibilities from top management down to the Incident supervisor are clearly defined, this being to assist with clear lines of demarcation and reporting. |  |
| 4.2.b. | arrangements for 24/7 hours coverage by trained responders? |  | The assessor should ask for a register of Incident supervisors and what method is used to obtain 24/7 coverage. From this point, questions should be asked of the incident supervisors onsite as to 24/7 coverage and the receipt by them of the schedule for 24/7 coverage. |  |
| 4.2.c. | a list of the different parties to be informed with their contact details (customers, authorities) ? |  | The emergency response plan should detail parties to be informed in the event of an emergency, both internally and externally. |  |
| 4.2.d. | a written procedure for handling the information towards the neighbourhood, the press and other interested parties of serious accidents/incidents that happened on site? |  | Check that this procedure is incorporated into the emergency plan. The different responsibilities and competences should be mentioned as well as training needed by those employees dealing with communication and information. Look also for an up to date list of contact numbers of applicable parties. |  |
| 4.2.e. | In case the company handles/transports plastic pellets, is there a documented procedure(s) in place including:  - Instructions for managing the clean-up, the use of the clean-up equipment and disposal of the pellets after a spill/loss to prevent impact to the environment?  - A clear definition for an acceptable cleaned up scenario after the incident? |  | The facility should keep a housekeeping level according to the definition in the Annex.  In case of an incident, pellets should be immediately collected to avoid that wind/rain increases the environmental impact.  If the incident happens on the road, traffic movement also increases the risk of environmental impact. Depending on local legislation about intervention of public emergency brigades, the transport company will define the driver’s responsibilities during the emergency. The shipper should be contacted for assistance/advice. | M |
| 4.3. | Is the emergency equipment maintained, tested or checked on a regular basis? |  | Fire hoses, fire extinguishers, eye bottles, emergency showers, breathing apparatus, first aid kit should be maintained/checked/tested on regular basis. The interval depends of the equipment and the local legislation. Proof can be seen on the equipment or in an adequate report. |  |
| 4.4. | Has there been a comprehensive test of the emergency plan for on-site and offsite emergencies during the past 12 months? |  | Evidence of a practical emergency exercise to test the system for on-site and off-siteemergencies during the last 12 months is required. For offsite emergencies, such an exercise may be limited to the testing of the emergency communication system and the actions to be taken on-site to deal with an off-site incident (it is not required to do a simulation of an off-site emergency). A detailed evaluation report of a real off-site incident during the last twelve months would also meet the requirements of this question. A possible test can be : Phone a driver, he should search for a parking area and call back. Then interview with a particular checklist a) explain to driver what has happened, like a valve is leaking b) ask driver what he has to do c) compare with the checklist  d) conclusion, what was missing, plan for improvement e.g. training, date, signature. | X |
| 4.5. | Is there a documented business continuity plan that includes IT system outages and does this plan contain the customer contacts to be informed? |  | This is a plan to ensure that operations continue in case of business disruptions/catastrophes due to different reasons. The plan will nominate responsible people who will be prepared and will react to the emergency. |  |
| **5.** | **Performance Analysis and Management Review** |  | **Performance Analysis and Management Review** |  |
| **5.1.** | **Non-conformance reporting, investigation, analysis, and corrective action** |  | Non-conformance reporting, investigation, analysis and corrective action. |  |
|  |  |  | Data should be available at every phase of the business from identifying new business through to customer reaction and feedback. The collection and analysis of data can indicate means of improving the service or conversely, can detect the onset of a reduction in the quality of service before it becomes a major issue. To verify the satisfactory operation of the reporting system, several sources of information should be checked such as reports to insurance companies, customer complaints and fines, feedback from internal observations (e.g. drivers). |  |
| 5.1.1. | Is there a documented system in place for recording non-conformances regarding? |  | This question (items a to h) only scores positively if there is a documented system in place for recording,clarifying what a non-conformance is, who must report, how and to whom. These questions are applicable for all domains such as environment, safety & health, quality, security and CSR. |  |
| 5.1.1.a. | accidents & incidents? |  | Accident: An unplanned event that did result in quality loss, injury, illness, or damage Incident : An unplanned event that could have resulted in quality loss, injury, illness, or damage If dangerous goods are involved, ADR § 1.8.5. could be relevant. Check also if these events are taken into account in the DGSA report.  Incidents resulting in loss of pellets to the environment should be recorded, investigated, and followed up.  The assessor can also cross-check the information coming from insurance claims and the Human Resource department. | M |
| 5.1.1.b. | breaches of security and threats? |  | Every event involving security breaches or threats such as theft, vandalism, entry without authorization, unwanted access to ICT systems, should be recorded and dealt with. |  |
| 5.1.1.c. | unsafe behaviour & unsafe conditions? |  | Situations or behaviour that did not result in quality loss, injury, illness, or damage, but have the potential to do so are to be registered and given a follow-up. The number of records available should be confirmed by the assessor during the site inspection. If there are no records in the file the assessor should take into account any evidence found during the visit of unsafe behaviour or conditions and scores this question zero. |  |
| 5.1.1.d. | regulatory compliance? |  | e.g. observed overdue implementation of new regulatory requirements and fines. |  |
| 5.1.1.e. | product contamination? |  | Self-explanatory. |  |
| 5.1.1.f. | product discrepancies and short shipments? |  | Every product discrepancy or short shipment (outside the normal operations) are considered. |  |
| 5.1.1.g. | corruption & bribery? |  | The assessor should ask to see the files recording any non-conformances. If the file is empty and the company states that there are no non-conformances, the assessor should write a comment. If the company claims that these records are confidential, the assessor should score 0 and record a comment. |  |
| 5.1.1.h. | grievance and disciplinary findings? |  | The assessor should ask to see the files recording any non-conformances. If the file is empty and the company states that there are no non-conformances, the assessor should write a comment. If the company claims that these records are confidential, the assessor should score 0 and record a comment. |  |
| 5.1.2. | Is a detailed report on non-compliances provided to the responsible management, containing immediate cause, root cause and recommendations for corrective actions to prevent recurrence? |  | A criteria to define when a non-conformance will open an investigation on root cause analysis has to be defined. Verify that there is a defined written process/procedure for the recording, investigation, root cause analysis and corrective actions to be taken, with time scales for actions. Refer to the "Guidelines for investigating transport accidents/incidents and Root Cause Analysis". In these cases, a detailed written report should be prepared for the responsible management without undue delay and in alignment with the internal procedure. Verify if the company has a system to check effectiveness of corrective actions. | X |
| 5.1.3. | After an incident/accident are the employees and contractors concerned informed and if necessary trained with the aid of a Root Cause analysis? |  | The feedback from an incident to all employees and contractors concerned is important to learn about the event and to prevent future occurrence. The root cause analysis should be the basis for such feedback and information. Verify if employees are aware of incidents and prevention measures. Root cause analysis should also cover security incidents. |  |
| 5.1.4. | Is there a procedure in place to inform the customer promptly of all non-conformances involving his shipments/products? |  | Check from records that the customer concerned is properly informed, when his shipment is involved, and that this is done on a routine basis. Score "0" if it is not done consistently. | X |
| 5.1.5. | Is the DGSA involved after an incident where dangerous goods were involved? |  | Check incident reports as well as the annual report of the DGSA. ADR 1.8. |  |
| **5.2.** | **SHEQ&Sec & CSR Objectives and Trend Analysis** |  | **SHEQ&Sec & CSR Objectives and Trend Analysis** |  |
| 5.2.1. | Is there a process in place to monitor and analyse SHEQ&Sec & CSR data to identify trends, to set objectives and is there an action plan in place to achieve these objectives? |  | An effective system should be in place for the recording and analysis of data, which allows for the identification of trends in the number of SHEQ&Sec & CSR non-conformances.  Check evidence that such a system exists. Ask to see a summary of the trend analysis for the last year(s). If a company has already been assessed, data should be available for the last three years, which should document continuous improvement on the issue. If not, this question must be scored with "0". Examples of CSR objectives can be number of transport and/or occupational accidents, damages to the environment, people trained, number of internal/external audits, etc. Big companies can use “consolidated” reports including data from their subsidiaries, but analysis of the data of the assessed subsidiary shall be available. |  |
| 5.2.2. | In case the company handles/transports plastic pellets, are performance objectives established? |  | The performance objectives shall be categorized according to the OCS pledge and the pellet loss hierarchy. The pellet loss performance objectives (e.g. zero pellet loss) shall be consistent with the OCS pledge, communicated to all people working on site, followed up and revised during the annual management review (see 5.4.1.g.). | M |
| 5.2.3. | In case the company handles/transport plastic pellets, does the company have internal KPIs on: |  |  |  |
| 5.2.3.a. | Question eliminated |  |  | ~~M~~ |
| 5.2.3.b. | Question eliminated |  |  | ~~M~~ |
| 5.2.3.c. | Number and volume of incidents resulting in any unrecovered release (loss) of plastic pellets, flakes, powders, or granules, to ground or water outside the facility and estimated to be greater than 0,5 litres or 0,5 kilograms per incident. |  | The company should use a methodology to measure pellet loss . If this is not possible, the spills that are recovered must be weighted or estimated. An estimation of the loss based on the following guides will be acceptable:  - Spills at sea are 100% lost  - Spills at inland waterway are 25% lost  - Spills at the side of the road are 0,5% lost  - Spills at the parking (paved or concrete) of a warehouse is 0,05% lost  - Spills in a covered warehouse are 0,005% lost as they can be broomed and shovelled up but are still moved by the tyres of the forklift or the soles of the operators shoes  - Spills at the side of the road (following an accident) are 0,5% lost if spilled on soft soil (sand, field, gravel)  - Spills at the side of the road (following an accident) are 0,05% lost if spilled on concrete, asphalt, pavement  - 0,005% of pellets collected from sewer sieves is lost too for the same reasons explained before. So, for every 100 grams that it is collected in the sewer sieve, 0,005 grams are lost into the environment | M |
| 5.2.3.d. | percentage of employees and contractors dealing with pellets that received operating training |  |  | M |
| 5.2.3.e. | % of programmed/planned OCS inspection/self-assessment that have been executed |  |  | M |
| 5.2.3.f. | % of relevant pellet handling business partners with whom the company promoted pellet loss awareness and the OCS programme? |  | Subcontractors referred in guideline of question 1.1.1.2.b. will be the objective of promotion.  The relevance of the pellet handling supplier will be defined by the assessed company. | M |
| 5.2.3.g. | % of contract(s) where there is an OCS clause with relevant pellet handling suppliers? |  |  | M |
| 5.2.4. | Has the annual Health, Safety, Security, Environment & CSR plan of the company been reviewed against the applicable Responsible Care Programme? |  | Responsible Care is a worldwide initiative of the chemical industry. In Europe this RC initiative is under control of Cefic, the European Chemical Industry Association. The company must have an HSSE & CSR action plan that is in line with the RC core principles – and the action plan must be traceable to these principles.  In the applicable RC Programme, it is described how such a review is organized, e.g. annual submission to ECTA or relevant National Association/Fecc European Responsible Care programme for distributors.  Refer to:  <https://www.ecta.com/Responsible-Care>  <https://www.fecc.org/about-fecc/what-is-responsible-care/fecc-european-responsible-care-programme/>  <https://cefic.org/responsible-care/> |  |
| 5.2.5. | Does the company promote the principles of Responsible Care to logistic partners? |  | One of the success factors of RC is the promotion of the programme into the supply chain. The company should promote its logistic partners actively to join this RC programme. |  |
| 5.2.6 | Is the KPI about pellet loss mentioned in 5.2.3.c reported to the corresponding trade association? |  | The auditor will verify that the company has made a submission to the trade association, when requested by it. | X |
| **5.3.** | **Internal Audit** |  | **Internal Audit** |  |
| 5.3.1. | Is there a documented programme |  | Fully Integrated Subcontractors (FIS) should be included in the audit programme. |  |
| 5.3.1.a | for internal auditing of all areas referred to in SQAS and covering compliance with applicable legislation and permits? |  | For an effective control of the Management Systems it is necessary to  audit each stage of the management system. Such audit(s) should be thorough and comprehensive. The audits must cover the information technology system, as well. The assessor should look for a written audit plan indicating a detailed system. A document detailing what will be audited, the frequency and who will do it must be available.  The audit programme will take into consideration:   * The competence and training of the internal auditors and their independence * The actions for non-conformities identified in the audits * The audit reporting * The management of any change in the operations of the facility * The actions from incidents * The effectiveness of preventive measures   Look specifically if the areas (chapters) as referred to in SQAS are sufficiently covered.  The actual situation of the company should be compared with the applicable legislation and the permits. | M |
| 5.3.1.b | For internal annual auditing of OCS requirements covering:   * the compliance of the routine inspection plan inside and outside its physical boundaries, and its effectiveness * the housekeeping status * the effectiveness and suitability of procedures, equipment and instructions to avoid spills and a potential loss into the environment * the estimation of the amount of pellet lost per year as a way to track progress towards the objective of zero pellet loss |  |  | M |
| 5.3.2. | For non-conformances identified in the audits, are action plans developed and are corrective actions taken? |  | Ask to see minutes, memos, and reports documenting that the action plans are developed, followed-up and proper corrective action taken. The company should have a documented system to validate the effectiveness of measures taken. |  |
| 5.3.3. | Do those carrying out auditing have training and/or competence in auditing and evaluation techniques? |  | Internal audits should be conducted by people trained in auditing and evaluating techniques, be independent of the activity being audited and at the appropriate level within the organization. Ask for objective evidence (course attendance, syllabus, diplomas, organization chart, experience, competence evaluation, etc.). |  |
| 5.3.4. | Are safety walkabouts carried out and documented by appropriate managers on a periodical basis? |  | Safety walkabouts are internal periodical safety inspections. The Senior Manager is the highest level manager with operational responsibility at the site. Therefore, it is important that they participate in SHE inspections. A walkabout every three months is a minimum. |  |
| **5.4.** | **Management Review Meetings** |  | **Management Review Meetings** |  |
| 5.4.1. | Is a formal management review meeting held at least once a year by the senior manager to review the management system that includes, as minimum, the following inputs? |  | Check for evidence that a formal management review of the management system is held, at least annually, to evaluate the overall effectiveness of these systems.  Big companies can show “consolidated” management review reports including information from all their subsidiaries, but analysis of the management systems of the assessed subsidiary shall be available. |  |
| 5.4.1.a. | the status of actions of previous Management review meetings |  | No guidelines. |  |
| 5.4.1.b. | the DGSA Annual report (if applicable) |  | No guidelines. |  |
| 5.4.1.c. | the performance of subcontractors |  | No guidelines. |  |
| 5.4.1.d. | the effectiveness of the training programme |  | No guidelines. |  |
| 5.4.1.e. | the results of internal and external audits |  | No guidelines. | M |
| 5.4.1.f. | the monitoring of trends of SHEQ, Sec &CSR KPIs, BBS KPIs and Responsible Care KPIs (if applicable) |  | No guidelines. | M |
| 5.4.1.g. | the extent of which SHEQ, Sec &CSR objectives have been met |  | No guidelines. |  |
| 5.4.1.h. | the effectiveness of the programmes about emission reduction (including GHG emissions) required in Transport Service, Tank Cleaning or Warehouse modules, in case they are applicable? |  | No guidelines. |  |
| 5.4.1.i. | the effectiveness of the programme about waste reduction required by question 2.6.4. |  | No guidelines. |  |
| 5.4.1.j. | the outcome of the last SQAS assessment (if applicable) |  | No guidelines. |  |
| 5.4.1.k. | the outcome of the emergency response drills |  | No guidelines. |  |
| 5.4.1.l. | the status of compliance with local, national and EU regulations |  | No guidelines. | M |
| 5.4.1.m. | recommendation(s) for continuous improvements |  | The recommendations shall include measures to prevent pellet loss to the environment, if applicable. | X |
| 5.4.2. | Did the senior management consider the recommendations of 5.4.1. and define an improvement action plan with allocated actions and due dates? |  |  |  |
| 5.4.3. | Does senior management monitor progress versus targets on SHEQ&Sec & CSR matters at relevant management meetings? |  | It should be evidenced that at every relevant management meeting held by senior management SHEQ&Sec & CSR matters are monitored regularly versus objectives and set targets. Verify if this is done. The Senior Management who is responsible must be defined. |  |
| 5.4.4. | Is there evidence that learning points from SHEQ&Sec issues are shared with the workforce? |  | There should be a process in place between the management and employees on SHEQ&Sec to share learning and to raise any issues of concern. Ways to achieve this may be through toolbox talks or one to one discussions. Ask for objective documented evidence that feedback is shared and input from employees is encouraged. |  |

# **Annex: Definitions related to pellet loss questions**

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| **List of concepts** | **Definition** |
| Clean-up | Recovering pellets that have been spilled. Recovering pellets from historical pollution is covered through remediation. |
| Good housekeeping | The primary element of good housekeeping is to ensure spills are prevented as the first layer of protection in the pellet loss hierarchy. This may include promotion of exemplary behaviours on pellet handling and ensuring there are tools to prevent spills.  The facility shall have instructions ensuring that in case of a spill incident, loose pellets are collected in the shortest possible timeframe and in case of leaks, loose pellets are collected routinely in order to avoid pellets getting lost to the environment. Special attention should thereby be given to minimize loose pellets in areas where there is a high likelihood of loss to the environment, e.g.:   * + nearby sewers and drains that do not have any pellet collection facilities or that are not connected to the manufacturing facility’s WWTP,   + in areas with high traffic (e.g. near gates),   + in areas close to the fence line,   + nearby graveled or non-paved areas,   + in areas where loose pellets may be picked up by the wind or water (rain) and transported outside,   + …   Incidents should be timely reported to allow for rapid and effective clean-up and housekeeping of spilled pellets. Frequency of housekeeping rounds should be assessed based on the exposure to loose pellets as well as on the risk of pellet loss.  Housekeeping standards should be checked frequently to ensure that standards are correctly maintained. |
| Hierarchy of measures | System implementing procedures in the following order of priority are: spill prevention, containment, then clean-up, with a goal to prevent pellet loss to the environment |
| Incident | An unusual or unexpected event which either resulted in or had the potential to result in an environmental impact. It can also be detection of spills from chronic spills and losses |
| Loss | **One-off or prolonged release of pellets OUTSIDE the operating boundary into the environment (e.g. water, soil...) and which are not recovered** |
| Leak | Escape of pellets from a process or system occurring over a prolonged period of time which needs mitigating action to prevent. The term leak can also can be considered as a form of spill. |
| Non-conformity | Non-fulfilment of OCS Core requirements or compulsory specific requirements |
| Plastics pellets | **Mass of preformed moulding material, having relatively uniform dimensions, used as feedstock in plastic product manufacturing operations.**  (Source: EN ISO 472:2013+A1:2018 (modified))  *NOTE 1: throughout this document plastic pellets, powders, flakes and dust, including recycled material, are referred to as “pellets”*  *a)* ***Plastic powder****: fine particulate matter that serves as a feedstock in plastic product manufacturing operations.*  *b)* ***Plastic flake****: small flat shaped matter with regular or irregular form that serves as feedstock in plastic product manufacturing operations or plastic that has been shredded. Plastic flake can be manufactured or generated though the agglomeration of plastic dust or powder when plastics are processed.*  *c)* ***Plastic dust****: fine particulate matter with irregular form and size, produced when plastics are manufactured, handled, conveyed, machined or processed.*  *NOTE 2 Pellets are produced in many colours. Plastic pellets are also known as “granules” or “nurdles” and are normally spherical or lenticular in shape.*  *NOTE 3 In some countries, plastic can also be termed “resin”.* |
| Preventive barrier/measure | either a physical barrier or a procedure that prevents a spill to occur. |
| Mitigating barrier/measure | either a physical barrier or a procedure that prevents a spill to result in a loss to the environment. |
| Spill | **One-off or prolonged release of pellets that when effectively contained do not result in a loss to the environment**. |