

Especially at unloading sites the driver is often the most experienced "chemical operator".

Photos: gela



## The driver: The general Drudge

**GUIDELINES** – Although there exist some actual guidelines by chemical transport associations especially for the safe (un)loading of trucks they are often neglected or ignored. Drivers bear the consequences.

BY MARC TWISK

Recently the European Chemical Transport Association (ECTA) conducted a survey amongst their member companies to identify the topics which are of great concern to them. They were asked to score twelve theses on their importance. Out of this twelve, two came out with a score above 85 per cent:

- ◆ Drivers are asked to perform more and other work at loading/unloading stations. This exceeds the normal tasks of a professional driver by selfloading/unloading without proper and agreed training, opening valves at customers' installation, sampling, ...

- ◆ ECTA has published a lot of guidelines mostly in cooperation with the European Chemical Industry Council (Cefic) and other associations. These guidelines are not sufficiently known or used by the customers to support

the activities performed by the transport companies at their own or customers' premises.

This shows, once again, that the Chemical Industry together with their partners in the logistic supply chain have developed clear guidelines how safe loading and unloading can be performed but that these are not applied in all cases.

This is also illustrated by the incident figures that were reported by the Responsible Care member companies of ECTA for the year 2014. Still 233 incidents – lost time injury or loss of product – have been reported at unloading sites. This is approximately double of those happening at loading sites.

There are at least three reasons identifiable for this:

- ◆ Unloading sites are, in contrast to the loading ones, not always

de facto (petro)chemical companies with the same standards in safety towards the products to be handled. Our members still report situations where drivers are to climb on their truck without supplementary protection and are forced to take samples from their ADR-load.

- ◆ The self unloading by drivers is a much more common activity than self loading. Furthermore self loading at chemical sites is in most cases only allowed after having a supplementary individual training. During an unloading operation done by a driver the risks related to his truck and tank are known but these related to the customers' installation are not so obvious and often not explained or trained properly. The driver is in a lot of cases the most experienced "chemical operator" present. Sometimes he is even the only operator present.

The Cefic/ECTA-guidelines are drawn up by experts (also from the European Association of Chemical Distributors – FECC and the European Federation of Tank Cleaning Organisations – Eftco) in the field of application and safety. They are based on legislation such as directive 89/391/EEC (OHS Framework Directive), standards and common practice. When transferring these guidelines towards operations at a customer site we notice that some hick-ups appear. Most of the time this transfer is done by the sales department of a chemical company. For a number of producers they are backed up by logistics and safety specialists but by far not for all. This is why these guidelines are not known and/or respected at a lot of unloading sites. In addition we notice that not all chemical companies are aware of the existing guidelines.

### Solution approaches

These are the facts but now is the crucial question: what can we do about it? First of all we have to make clear to the chemical producers to tackle this in close cooperation because it is impos-



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sible to solve it only by the Logistics Service Providers (LSP). It is quite simple to state that unloading will not take place if not all measures are taken and guidelines are followed. In that case the involved driver risks to be expelled from the site and the next one, making less fuzz about it, takes over without changing the cause of the problem.

We at ECTA would appreciate if the respect of all applicable Cefic/ECTA-guidelines – and therefore all related legislation as well – would be mentioned in every contract. Hereby we mean not only the contracts between the chemical companies and their LSPs but also the contracts between the chemical companies and their customers.

Secondly, we have to stimulate our customers and our members to use more often the “Site (Un)Loading Information Document” (SULID). This document was created in 2010 during a joint working group to enforce the knowledge on technical and safety properties of each loading and unloading site. SULID is used at a number of locations but is not as well spread as we would expect. Also a better availability of the completed documents via a website or portal should improve the use of SULID.

Further we will inform our members even more intense about the existing guidelines and other documents during workshops and in our communications. On top of this we are planning to launch a simple checklist that our members can use during (un)loading activities.

We are also open to support the chemical companies which have not the manpower or the relevant knowledge in explaining the necessity of application of the guidelines to their customers.

Will all these activities now result in a sudden change in the situation or mentality? Probably not, but if all partners in the chemical logistics supply chain continue to hammer on the same nail it can be hoped that it will finally get through.

## ECTA's Mission

ECTA provides the Chemical Transport Industry with an **authoritative voice** at European level. Within that scope it ensures that the Industry's views are effectively communicated to key audiences, authorities and institutions within Europe at regional, national and European level.

The organisation situated in Brussels gathers European land transport companies with the aim to improve the **standards of efficiency, safety and quality** as well as the environmental and social impacts of transport logistics, tank cleaning and warehousing of chemical goods in Europe. The mission is to be reached by developing **Best Practices** on the basis of joint

studies in co-operation of its members, other associations having related interests, authorities and institutions within Europe.

Not less important is ECTA's **Responsible Care (RC) Programme**. ECTA was the first association to launch a pro-actively European wide Responsible Care programme of Chemical Industry in the logistics and associated sectors field.

The RC-programme has to be seen against the following background: The transport industry continuously strives to improve the safety of their operations by undertaking HSSE-initiatives such as SQAS, BBS, Best Practice Guidelines (for example Safe Driving, Un-/Loading, Working

at Height) etc. This over the years led to a decrease in the number of road transport accidents. However, this trend has staggered in the last few years, with the annual accident statistics of some transport companies showing a flat line.

There are a number of external issues that have contributed to this, being, increased traffic and congestion across Europe, transport volume requirements in general, work pressure... Also because of general behaviour and demographic changes, the **demands on drivers** of heavy goods vehicles are now much more complex and pressing than in the past.

[www.ecta.com](http://www.ecta.com)



Good practice of Working at Height

## Conclusion

The management of each site has to be aware of its responsibility during the loading or unloading activities at its premises. It is not because some activities are performed by a second party (the

driver) that all responsibilities are also taken over.

Working on preventative measures is perhaps a long and hard way to achieve a result but it is much better than the usual “management by accident”. ■



# Expanding Responsible Care

**INTERVIEW** – Marc Twisk is Managing Director of the European Chemical Transport Association (ECTA). In the interview he explains the long-term goals of the organisation founded in 1997.

BY STEFAN KLEIN

*Mr. Twisk, what is the most important initiative ECTA is working on at the moment?*

**Twisk:** We are working on different issues for the moment but a further support and expanding of our Responsible Care (RC) program stays one of the key issues. Our members who have entered the programme have a firm commitment to continuously improve their performance in Quality, Health, Safety & Environment (QHSE) what can be proved through their achievements around predefined Key Performance Indicators (KPI) such as number of transport incidents, emission of CO<sub>2</sub> and optimal use of multimodal transport means.

*Why chemical industry seems not that interested in this issue?*

**Twisk:** Indeed the interest of the chemical industry in our RC scheme is very limited. We notice that for the moment only one major is introducing RC in its tender processes. Although our Responsible Care programme is built on an agreement with the European Chemical Industry Council (Cefic) we need to promote it further more and show our customers the benefits of it. Especially the concrete KPIs and goals show the advantage of the RC system and is an added value in the evaluation of the Supply Chain.

*Meanwhile the Safety and Quality Assessment System (SQAS) is accepted by chemical shippers. This year the SQAS questionnaires were renewed – only in detail or do you see significant changes?*

**Twisk:** There are indeed significant changes in the new SQAS due to the introduction of Corpo-



Photo: ECTA

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rate Social Responsibility (QSR) issues. Several of our customers have expressed the need that our members show their commitment to CSR. Because we want to prevent that still another assessment scheme is forced upon our members we have – together with Cefic, the European Association of Chemical Distributors (FECC) and the European Federation of Tank Cleaning Organisations (EFTCO) – worked hard to include the necessary demands into the questions of SQAS. This resulted in a significant update of the SQAS questionnaires that should be in compliance with the enforced demands. This also resulted in an upgrade of the demands to comply with our RC programme. Furthermore some changes towards the risk evaluation in security and safety are also brought to a next level.

*What are other major issues that ECTA pursues?*

**Twisk:** As mentioned we are focused on the issues mentioned in our RC programme such as reducing incidents and emissions by implementing preventative measures such as introducing guidelines on safe (un)loading of products, uniform Safety Risk Assessment and investigating transport accidents. In a recently held survey amongst our members it came out that those guidelines are well appreciated by our members but hardly known and applied at the different unloading sites outside the main chemical plants. This same survey showed a concern for the further increasing demand of the large variety of software demands by our customers. The urge for information is understandable but could be more structured at not (only) on the shoulders of the carriers.

*Where do you currently see the biggest challenges for chemical transport in Europe?*

**Twisk:** We have to be vigilant to clearly bring the message to the public – together with our customers – that we are performing the transport of chemicals as safe and environmental friendly as possible and that we are still trying to improve this performance. Each incident is one too many but we learn from it and try to avoid it in the future. Also towards the emission of greenhouse gas we still have to further improve since the percentage of emissions by transport in the chemical life cycle is increasing. Therefore we support initiatives that reduce the CO<sub>2</sub> emissions such as multimodal transport, jumbo-trucks or others.

*What are the aims and the actual fulfilments of these aims of the sector in reducing carbon dioxide emissions?*

**Twisk:** As mentioned above we still aim to reduce our emissions but this is not always in our hands since our customers and the location of unloading sites force us to use a transport mode with

a higher CO<sub>2</sub> emission. Not all (un-)loading sites are reachable by rail transport or distances are too little to have an advantage to "go intermodal". On top of this we notice that cleaner trucks with Euro 6 engines in relation to NO<sub>x</sub> and SO<sub>x</sub> are not always favourable in relation to previous models for what concerns CO<sub>2</sub> emissions as those engines consume more fuel – and CO<sub>2</sub> emission is only linked to the amount of diesel burned.

I also tend to mention that the industry with their Just in Time (JIT)-policy (slotbooking +/- 30 minutes for loading) increases CO<sub>2</sub> emissions. LSPs are forced to use the equipment which is on time and not the one which is the closest to the loading site – avoiding empty legs.

*What are the implications for European transport operators in the rise of Far and Middle East as major petrochemical producer regions?*

**Twisk:** This will have an impact on the sort of products that will be transported from Middle East to Europe. More and more specialities in lower volumes are shipped to the final users in industry all around the globe. This means that our members, if they are present in the other regions, will have the opportunity to handle the logistics from these petrochemical producers towards Europe as well as within Europe. Because major chemical producers are present in Far and Middle East and our partnership in Europe this cooperation can be expanded. This is why several of our members are already present in the Far and Middle East in different Joint Ventures with local companies or, if possible, on their own.

*When we look at the several modes of land transport: what special challenges are road, rail and barge faced with?*

**Twisk:** All have their specific challenges but the main issue is still how can we provide the service that our customers are

requiring in the future. In the world of JIT-delivery issues such as traffic jams, itinerary restriction, labour hour limiting, and driver's shortage are elements to be taken more and more into account for road transport. For rail transport the throughput time and flexibility are still issues to be tackled. The situation of barge transport is rather unknown to me but what I hear is that the use is still too limited to speak about a huge success although possibilities are present if more people are convinced to be more flexible about throughput time and the prices are in competition with land transport.

*In which way ECTA has separated from European Petrochemical Association (EPCA) since the spin-off in 1997?*

**Twisk:** EPCA and its members have seen the need to organise their LSPs in an association, so ECTA was founded and for many years supported – also financially – by EPCA. An intensive cooperation and collaboration in different working groups showed the success of this idea.

In 2008 EPCA and ECTA decided to "unknot" the organisation and within two years ECTA became fully – also financially – independent from EPCA. For a couple of years ECTA still used the EPCA infrastructure, such as offices, IT, etc. With January 2016 ECTA offices will move to a new address which is the final stage in the separation. Nevertheless between EPCA and ECTA a very close cooperation is ongoing – with a clear separation of competences. While EPCA is more focused on general supply chain topics, ECTA is the voice of the European chemical service providers with a strong focus on issues around the physical distribution.

*Today 102 ECTA members stand for 80 per cent of European land transport of chemicals. Has the organisation something like "market power" towards the potent chemical industry?*

**Twisk:** ECTA is not a lobbying body and our interest is not to develop a "market power". The idea of founding ECTA through its members was to have an organisation which allows a direct communication and close cooperation. This was in the past very difficult by the one to one communication between shippers and individual Logistics Service Providers (LSP).

Our aim is to improve safety and environmental topics for European land transportation of chemicals. In view of the number of members and the vast volumes transported by these LSPs we try to talk as "one voice" and set uniform Best Practices and guidelines which is the important fundament of our success.

*ECTA members are competitors in "normal life". Where are the big advantages of membership?*

**Twisk:** Perhaps members are competitors in "normal life" but we notice that common points of view in technical and QSHE issues can enforce our position towards the chemical industry. In having one voice towards our customers does not provide us with a better position but facilitates the relation between two parties. This reflects very clearly in the numerous common initiatives such as SQAS, several guidelines and positions in regard to changes in legislation.

As already mentioned earlier our survey also revealed the necessity for common approach in other issues such as the use of software and the training needs and obligations of drivers. I see in this one of the challenges for ECTA in the coming years.

*Are there topics that are not discussed during ECTA-meetings, workshops etc.?*

**Twisk:** Of course we do not exchange information that is not in conformity with competition law such as pricing, contracts, transportation rates or market procedures. This is made clear at every meeting or social gatherings organised by ECTA. ■