



HSE Guide

Safety and Security Checks for Tank Containers

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1. Overview

The purpose of this HSE Guide is to define the safety and security checks that are necessary for the safe and secure transport of Syngenta products in tank containers. These checks will:

- Maintain integrity of tank containers and protect against the introduction of unauthorized material and/or persons
- Ensure that tank containers carrying Syngenta products are in the best technical condition throughout the complete journey
- Ensure compliance with the requirements of Dangerous Goods legislation, especially the IMDG code
- Enable intervention where the transport does not comply with the regulations or where it puts safety, security or the environment at risk

This HSE Guide applies to

- The carriage of Syngenta products, raw materials etc., in tank containers under a Syngenta contract or spot agreement.
- All Syngenta sites, toll manufactures and suppliers who load or discharge materials into or from a tank container which will be transported under a Syngenta contract or spot agreement.
- All Syngenta sites that discharge materials from a tank container transported under a contract or spot agreement arranged by a supplier.
- All Syngenta personnel who establish or manage contracts with 3rd party logistics service providers that involve the carriage of bulk liquids in Tank Containers. Definitions (Optional Section)

2. Definitions

Term	Definition
Dangerous Goods	Goods that have certain hazards that are defined in the Dangerous Goods regulations applicable to the mode of transport e.g. IMDG code
Designated person	A responsible, designated representative of the loading/unloading site who maintains a position of trust (e.g. security personnel) and has received appropriate training in the application of high security seals.
High security seal	A seal, complying with the current edition of ISO 17712 that is intended to indicate if the load has been tampered with during its journey.
IMDG code	International Maritime Dangerous Goods code. An international agreement that covers the transport of dangerous goods by sea

3. Roles and responsibilities

Role	Responsibility
Syngenta site, or toll manufacturer, or Logistics	Establish local work instructions and procedures that implement this Code of Practice
Logistics procurement	Communicate the requirements of this Code of Practice to tank container operators
Procurement	Communicate the requirements of this Code of Practice to suppliers who load tank containers that will be carried under a Syngenta contract or spot agreement.

4. Guidance

4.1. Legal Requirements

The requirements of the Dangerous Goods regulations, as they apply to the carriage of bulk liquids in tank containers, must be complied with at all times.

4.2. Loading of tank containers

A process must be in place to ensure pre-trip inspection checks are carried out before and after the loading tank containers to confirm they are suitable and comply with applicable regulations.	Requirement LOG.17
Tanker containers must be loaded in accordance with a procedure to minimize the potential for incidents during loading, transport and unloading.	LOG.18

That means

- All personnel who are involved with the loading of tank containers must be suitably trained.
- Pre-trip inspection checks must be carried out before and after the loading to ensure that the carriage complies with legal and environmental requirements. The completed checklist must be archived, in compliance with local legal requirements, but for a minimum of 12 months.
- A tank container must not be loaded when the next regulatory inspection is due to take place before the planned discharge date and return of the empty tank container.
- Personal Protective Equipment (PPE), as defined by the site, must be worn for all operations carried out on the tank container or their fittings
- A tank container must only be loaded with products whose carriage is approved and which do not weaken or react dangerously with the materials of the shell, equipment and protective linings.
- Appropriate measures must be taken during loading of a tank container to prevent the release of gases and vapours.

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- The minimum and maximum legal filling limits must be complied with (non-baffled Tank Container) i.e. <20% or >80-95%. These limits apply to both Dangerous Goods and non-Dangerous Goods
- The gross weight must not exceed the lowest of
 - the maximum design gross weight marked on the tank container or indicated on the tank container certificate or
 - the maximum weight permitted by the transport operator or national authorities for carriage up to the final destination
- A tank container must be thoroughly checked by the loading site after filling to ensure that all openings are correctly closed (especially the dip tube)
 - Closed and leak proof means that all openings and outlets for loading and discharge (whether or not used during the last loading or discharge operation) are closed in such a way that they cannot be opened by hand
- The exterior of a tank container must be free from spillage or residue of previous cargos.
- Where a product is shipped under a nitrogen blanket, the tank must be labelled by the manlid and discharge valve to indicate that an inert atmosphere is present. If the tank is also pressurised, this must be indicated.
- Prior to dispatch, all openings of a tank container must be sealed with high security seals that comply with the current edition of ISO 17712
- Seals must only be attached by a designated person
- Access to seals must be strictly controlled and must be issued in random order.
- Seals must be stored in a secure location (locked cabinet, safe etc.) prior to use
- A log must be maintained in order to account for all seals under the control of the loading site. Periodic inventories of seals and the seal use log must be conducted to ensure that all seals are accounted for.
- All Bills of Lading, dangerous goods declarations or other transport documents (including electronic data transmissions) must be complete and include all seal numbers used for the Tank Container.

The following supporting documents is available

- Form "Pre-trip inspection checklist for tank containers"



4.3. Discharging Tank Containers

The unloading procedure must ensure that the identity of the tank container's contents have been confirmed before discharging into a bulk storage tank.	Requirement LOG.23
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- All personnel who are involved with the discharging of tank containers must be suitably trained.
- Before accepting a tank container, the discharging site must verify the seals numbers recorded on the documentation against the seals on the tank container. Any discrepancy must be rectified before the tank container is accepted. If the discrepancy cannot be rectified within a reasonable period of time, the tank container must be rejected.
- Before discharging a tank container into a bulk storage tank, the identity of the tank container's contents must be positively confirmed as being correct.
 - The tank container number quoted on the documentation must match exactly the number on the tank container
 - For dangerous goods, the dangerous goods information on the documentation must match the placards and marks on the tanks
- Personal Protective Equipment (PPE), as defined by the site, must be worn for all operations carried out on the tank container or their fittings
- Appropriate measures must be taken during the discharge of Tank Container to prevent the release of gases and vapours.
- Where tanks are pressurised or materials have been loaded under an inert atmosphere, appropriate measures must be taken during the discharge of the tank container to protect personnel.
- The exterior of the tank container must be free from spillage or residue before they leave the discharge site
- An empty, uncleaned tank container must be closed in the same manner and be leak proof to the same degree as though they were full.
- Prior to dispatch of the empty, uncleaned tank container, all openings must be sealed with high security seals that comply with the current edition of ISO 17712.
- Seals must only be attached by a designated person.
- Access to seals must be strictly controlled and must be issued in random order.
- Seals must be stored in a secure location (locked cabinet, safe etc.) prior to use
- A log must be maintained in order to account for all seals under the control of the loading site. Periodic inventories of seals and the seal use log must be conducted to ensure that all seals are accounted for.

Operator responsibilities

- Upon receipt of the tank container, operators must verify the accuracy of seal numbers contained on bills of lading, dangerous goods declarations or other documentation.
- Operators must establish, and ensure that their subcontractors establish, verifiable security systems for a tank container storage and handling facilities, depots and conveyances operated by the carriers in order to prevent improper manipulation and transportation of the tank container

- Operators must establish procedures for reporting any incidents affecting the tank container or discrepancies or anomalies relating to seal integrity to Syngenta immediately.

Incident reporting and follow-up

Rejection of an unsafe tank container and seal number discrepancies must be reported and investigated via the Distribution Safety reporting process.

Summary Sheet

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