

C	1.	Management System and Responsibility		
C	1.1.	Management Responsibility		
C	1.1.1.	Company Policies		
C	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? <i>Assessor: Company has a written policy dated 18/01/2021</i>	RC	1
C	1.1.1.2.	In case the company handles/transport or subcontracts handling or transport of pellets:		
C	1.1.1.2.a.	- Has the senior management signed up to "Operation Clean Sweep" (OCS) programme? <i>Assessor: It was signed in 2022</i>		1
C	1.1.1.2.b.	- Has the company asked the applicable subcontractors to sign the OCS programme?		0
C	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?		-
C	1.1.1.4.	Are senior managers sufficiently visible and engaged in carrying forward the SHEQ&Sec message? <i>Assessor: Seen meeting dated 26/01/2022 with all managers involved and training with personnel</i>	RC	1
C	1.1.2.	Roles & Responsibilities		
C	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? <i>Assessor: Organisational chart dated 05/05/2022 Verified jobs description and to whom they report</i>		1
C	1.1.3.	Legislation and other requirements		
C	1.1.3.5.	In case the company handles/transport plastic pellets:		
C	1.1.3.5.a.	- is there a process for informing the regulatory bodies (where regulations require it) if a pellet loss happens? <i>Assessor: Seen procedure dated 06/09/2022</i>		1
C	1.1.3.5.b.	- is there a process for internal and external communication about the pellet loss programme progress?		1



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C	2.	Risk management	
C	2.1.	Risk assessment and mitigation measures	
C	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?	
C	2.1.1.d.	- identification of potential spillages/losses of plastic pellets in case the company handles/transportes them?	0
C	2.1.1.e.	- identification of potential generation of plastic dust in case that the company handles/transportes pellets?	0
C	2.1.2.	If company has site activities: Are the physical boundaries of the OCS programme, including areas surrounding the site, defined and documented?	1
C	2.1.3.	Is there a risk minimization plan to prevent and address spills/losses of plastic pellets and their recurrence? <i>Assessor: Seen DVR dated 28/10/2021</i>	1
C	2.6.	Environment	
C	2.6.3.	Is plastic waste not sent to landfilling? <i>Assessor: Drivers manual follows also CEFIC guidelines about pellet loss</i>	1

C	3.	Human Resources		
C	3.2.	Training		
C	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? <i>Assessor: Training programme is done annually Seen training programme dated 19/01/2023 for the year 2023 and the programme of 2022 The programme of 2022 was regularly done This programme is reviewed every year during management review</i>	RC	<div>1</div>
C	3.2.2.	Are the following subjects being trained?		
C	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/transport plastic pellets <i>Assessor: Training done on 02/08/2022</i>		<div>1</div>
C	3.2.3.	Are employees informed about the evolution of the company's OCS programme?		<div>1</div>
C	3.2.4.	Are employees encouraged to provide feedback on the company's OCS programme to the line management?		<div>1</div>
C	3.3.	Behaviour Based Safety (BBS)		
C	3.3.1.	Has a BBS implementation plan, or an established programme, been set up with targets, resourcing and timeline? <i>Assessor: Seen BBS plan dated 16/03/2021 BBS is planned every year It establish targets , resources and timeline</i>	RC	<div>1</div>



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C	4.	On/Off Site Emergency Preparedness and Response		
C	4.1.	Is there a written plan for dealing with on-site and off-site emergencies and potential crises? <i>Assessor: Seen emergency plan dated 15/06/2022</i>	RC	<div>1</div>
C	4.2.	Does this written plan contain the following information?		
C	4.2.e.	- In case the company handles/transportes 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?		<div>1</div>
C	4.4.	Has there been a comprehensive test of the emergency plan for on-site and offsite emergencies during the past 12 months? <i>Assessor: The last emergency test was done on 13/06/2022 and the report is available dated 23/04/2022 also for offsite emergency</i>		<div>1</div>

C	5.	Performance Analysis and Management Review		
C	5.1.	Non-conformance reporting, investigation, analysis, and corrective action		
C	5.1.1.	Is there a documented system in place for recording non-conformances regarding?		
C	5.1.1.a.	- accidents & incidents? <i>Assessor: Seen procedure 10 dated 10/07/2020 Verified internal audit plan dated 18/01/2022 and 16/01/2023 This question is included</i>	RC	1
C	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?	RC	1
C	5.1.4.	Is there a procedure in place to inform the customer promptly of all non-conformances involving his shipments/products? <i>Assessor: Seen procedure 10 dated 10/07/2020</i>		1
C	5.2.	SHEQ&Sec & CSR Objectives and Trend Analysis		
C	5.2.2.	In case the company handles/transport plastic pellets, are performance objectives established? <i>Assessor: Seen management review dated 19/01/2023</i>		1
C	5.2.3.	In case the company handles/transport plastic pellets, does the company have internal KPIs on:		
C	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.		0
C	5.2.3.d.	- percentage of employees and contractors dealing with pellets that received operating training		1
C	5.2.3.e.	- % of programmed/planned OCS inspection/self-assessment that have been executed		1
C	5.2.3.f.	- % of relevant pellet handling business partners with whom the company promoted pellet loss awareness and the OCS programme?		0
C	5.2.3.g.	- % of contract(s) where there is an OCS clause with relevant pellet handling suppliers? <i>Assessor: No suppliers of pellet</i>		-
C	5.2.6.	Is the KPI about pellet loss mentioned in 5.2.3.c reported to the corresponding trade association?		-
C	5.3.	Internal Audit		
C	5.3.1.	Is there a documented programme		
C	5.3.1.a.	- for internal auditing of all areas referred to in SQAS and covering compliance with applicable legislation and permits? <i>Assessor: Internal audit plan is done every year and for the company's areas Seen internal audit of the year 2022 and the plan of 2023 Seen procedure 9 dated 10/07/2020</i>	RC	1
C	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		-
C	5.4.	Management Review Meetings		
C	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?	RC	
C	5.4.1.e.	- the results of internal and external audits		1
C	5.4.1.f.	- the monitoring of trends of SHEQ, Sec & CSR KPIs, BBS KPIs and Responsible Care KPIs (if applicable)		0
C	5.4.1.l.	- the status of compliance with local, national and EU regulations		1
C	5.4.1.m.	- recommendation(s) for continuous improvements		1

6.	Management of Subcontractors		
6.1.	Subcontracting services		
6.1.1.	Subcontracting policy		
6.1.1.3.	In case the subcontractors transport plastics pellets, is there a documented process defining and choosing the logistics solution and selecting the service partners, including a risk assessment covering OCS requirements?		1
6.1.3.	Non-integrated road transport subcontractors		
6.1.3.2.	Does the assessed company hand out a driver manual as defined in 11.3.1 to drivers of non-integrated subcontractors or check that the subcontractor's handbook is consistent with its own? <i>Assessor: E.G. Coniglio Emanuele received Drivers manual on 17/06/2022 and relevant training</i>		1
6.2.	Performance monitoring of subcontractors		
6.2.1.	Performance criteria for Road Transport subcontractors		
6.2.1.1.	Is there a written agreement with each road transport subcontractor (FIS and non-integrated subcontractors) that contains the requirements and standards relating to the following criteria:		
6.2.1.1.h.	- use of approved tank cleaning stations?	RC	1
6.2.2.	Performance monitoring process		
6.2.2.4.	When SQAS packages are not used, are the following criteria taken into account to evaluate the non-integrated road transport subcontractors?		
6.2.2.4.k.	- handling and reporting of non-conformances (transport events) <i>Assessor: It is included in the agreement</i>	RCimp	1
6.2.2.4.o.	- OCS requirements in case you are subcontracting transport of plastics? <i>Assessor: It is included in the agreement</i>		1



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8.	Behaviour Based Safety (BBS or equivalent programme)	
8.1.	Behaviour based safety for safe driving	
8.1.2.	BBS Results, Analysis and Monitoring	
8.1.2.2.	Are key performance indicators identified and measured, such as:	
8.1.2.2.a.	- accidents and incidents whilst in transit?	1
8.1.2.2.b.	- accidents and incidents at loading points?	1
8.1.2.2.c.	- accidents and incidents at unloading points?	1

11.	Control of operations	
11.3.	Operations	
11.3.1.	Driver instructions (Driver Manual)	
11.3.1.4.	<p>Are there detailed instructions in the available driver manual regarding the following topics:- BBS principles- incident and near miss reporting- use of seat belt- use of company or private mobile phone- use of drugs and alcohol- actions to be taken in an emergency- security- inspection prior to loading- loading procedures- prescribed documentation, including instructions in writing, is on board- safety equipment required by legislation- after loading, verification that the vehicle and load have no obvious defects, leakages, cracks, missing equipment- after loading, verification that the vehicle is not overloaded- after loading, verification that danger labels and markings (orange plates) prescribed for the vehicles, have been affixed (ADR and IMDG goods)- operating/driving restrictions during bad weather conditions- actions to be taken if, during the journey, an infringement which could jeopardize the safety of the transport, is observed (ADR goods)- unloading procedures- observation of instructions/practices at loading and unloading sites and reporting of unsafe conditions- use of wheel chocks (to avoid uncontrolled vehicle movement)- defect reporting and rectification system- pre-start checklist- use of standard PPE- fall arrest harness- PPE for special products- entry into confined space- if the container is used for bulk solids, is it tipped in stages, e.g., one ram at the time, to prevent product surge?</p> <p><i>Assessor: Drivers manual is dated 10/07/2020In drivers manual are included all items of this question</i></p>	1
11.6.	Transport of dry products including plastics and polymers	
11.6.1.	<p>Is there a written procedure in place which requires the driver to verify if, during and after loading and unloading, lost pellets are properly removed from the outside of the transport equipment before leaving the loading/unloading site?</p> <p><i>Assessor: Seen drivers manual where drivers have to verify if there is loss of pellets and what they must do</i></p>	1
11.6.2.	<p>Is equipment to contain and clean up pellets available on the truck?</p> <p><i>Assessor: Seen drivers manual where drivers have to verify if there is loss of pellets and what they must do</i></p>	1
11.6.3.	Does the driver have instructions that require pellets to be put in closed containers or bags for proper disposal?	1
11.6.4.	In case of transportation of pellets in bulk tanks, does the driver have instructions that the bottom manhole/cone of the silo tank should not be opened before entering the cleaning bay?	1
11.6.5.	Does the driver have instructions which prohibits the replacement of the container liner in any public area?	1