

INEOS

Olefins & Polymers
Europe

Operation Clean Sweep and beyond

By Alex Degeest

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VOLVO

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LAG

Gardner Denver

Volvo

VOLVO TRUCK CENTER
VOLVO

INEOS

TOGETHER FOR

ZERO

PELLETT LOSS

Operation Clean Sweep

Topics

- IMO -> MEPC.1-Circ.909
- Europe -> REACH regulation
- EUROPE -> PPLR regulation
- PLASTICSEUROPE -> OCS
- CEFIC -> SQAS 2025 / OCS



International Maritime Organisation - IMO

Marine Environment Protection Committee – MEPC

MEPC.1-circular 909 dd 19 April 2024

- Are you concerned?
- Yes, but depending on your supply chain (international / sea-going)
- SQAS 2025 Transport Service Masterfile Ref. 11.6.8.1 and 11.6.8.2 -> **Mandatory item/question for OCS.**

International Maritime Organisation - IMO

Marine Environment Protection Committee – MEPC

MEPC.1-circular 909 dd 19 April 2024

- Recommendation but...

.3 Freight containers containing plastic pellets should be properly stowed and secured so as to minimize the hazards to the marine environment without impairing the safety of the ship and persons on board.

Specifically, freight containers containing plastic pellets should be stowed:

.1 under deck wherever reasonably practicable; or

.2 inboard in sheltered areas of exposed decks.

- SQAS 2025 Transport Service Masterfile Ref. 11.6.8.1 and 11.6.8.2 -> **Mandatory** item/question for OCS.

International Maritime Organisation - IMO

Marine Environment Protection Committee – MEPC

MEPC.1-circular 909 dd 19 April 2024

- Use the **updated recommended implementation** of paragraph 1.2 of the MEPC Circular, with changes in red as per PPR 13/11/8:
 1. Use of the code “**PLX**” on the booking request and shipping instructions.
 2. The booking request and shipping instructions should also **include the following declaration statement:**

“Freight container contains plastic pellets in accordance with paragraphs 1.1 and 1.2 of IMO Circular MEPC.1/Circ.909 and is subject to proper stowage and securement under deck wherever reasonably practicable, or inboard in sheltered areas of exposed decks (in accordance with paragraph 1.3 of that Circular).”

Or abbreviated

“Contains PLASTIC PELLETS as per MEPC.1/Circ.909 (para. 1.1 and 1.2). Freight container subject to stowage and securement under deck or inboard in sheltered areas of exposed. (para 1.3)”

Commission Regulation (EU) 2023/2055 of 25 September 2023 amending Annex XVII to Regulation (EC) No 1907/2006 of the European Parliament and of the Council concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH) as regards synthetic polymer microparticles.

- Are you concerned?
- Yes, but indirectly by article 11 and 12 of entry 78
- SQAS 2025 Transport Service Masterfile (mandatory item)
 - Ref. 2.1.3.2
 - Ref. 4.2.5
 - Ref. 5.2.3.1. : number and volume of incidents → loss calculation method.

Transport is indirectly concerned

11. Starting from 2026 manufacturers and industrial downstream users of synthetic polymer microparticles in the form of pellets, flakes, and powders used as feedstock in plastic manufacturing at industrial sites, and, starting from 2027, other manufacturers of synthetic polymer microparticles and other industrial downstream users using synthetic polymer microparticles at industrial sites shall submit the following information to the Agency by 31 May of each year:

- (a) description of the uses of synthetic polymer microparticles in the previous calendar year;
- (b) for each use of synthetic polymer microparticles, generic information on the identity of the polymers used;
- (c) for each use of synthetic polymer microparticles, an estimate of the quantity of synthetic polymer microparticles released to the environment in the previous calendar year, which shall include also the quantity of synthetic polymer microparticles released to the environment during transportation.
- (d) for each use of synthetic polymer microparticles, a reference to the derogation laid down in paragraph 4, point (a).

Transport is indirectly concerned

12. From 2027, suppliers of products containing synthetic polymer microparticles referred to in paragraphs 4, points (b), (d) and (e), and paragraph 5, placed on the market for the first time to professional users and the general public, shall submit the following information to the Agency by 31 May of each year:
- (a) a description of the end uses for which the synthetic polymer microparticles were placed on the market in the previous calendar year;
 - (b) for each end use for which the synthetic polymer microparticles were placed on the market, generic information on the identity of the polymers placed on the market in the previous calendar year;
 - (c) for each end use for which the synthetic polymer microparticles were placed on the market, an estimate of the quantity of synthetic polymer microparticles released to the environment in the previous calendar year, which shall include also the quantity of synthetic polymer microparticles released to the environment during transportation.
 - (d) for each use of synthetic polymer microparticles, a reference to the applicable derogation or derogations laid down in paragraph 4, point (b), (d) or (e), or 5 point (a), (b) or (c)

Emissions during transportation (ECHA guideline)

As set out in the restriction, the reported emissions shall include an estimation of the quantity of SPM released to the environment **during transportation**.

The estimated transportation emissions will be reported together with the emissions from the use/end use as one aggregated estimate under the relevant pre-defined use.

The actor who will assume responsibility for the obligation for reporting transport emissions should be based on the legal liabilities set out in the contractual agreements between companies.

Example 5. Transport emissions

Emissions during transportation should include an estimation of emissions **due to incidents and accidental releases as well as any releases reasonably assumed to occur during normal transport operations**. For this estimation, the reporter should use information available to them about the frequency, nature and magnitude of such accidents in their company or more generally within their sector of business. The company responsible for including an estimation of emissions occurring during transportation should be based on contractual agreements defining the company who has ownership of the product during transportation.

Note:

Transport companies are not duty holders under REACH and therefore do not have direct reporting obligations. Reporting responsibilities remain exclusively with the relevant LE (who may be a manufacturer, importer, downstream user or supplier).

**REGULATION (EU) 2025/2365 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL
of 12 November 2025
on preventing plastic pellet losses to reduce microplastic pollution**

- Are you concerned?
- Yes, definitely directly by article 1, 4 and 5 para. 6 and 7 and annex III
- Also Non-EU carriers are concerned.
Through the authorised representative of non-Eu carriers (art. 4)
- SQAS 2025 Transport Service Masterfile (mandatory item)
 - Ref. 4.1.
 - Ref. 4.2.5
 - And others.

**REGULATION (EU) 2025/2365 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL
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Article 5:

5.4. **EU carriers and non-EU carriers** shall ensure that the actions set out in Annex III are implemented.

5.5. When economic operators implement the actions set out in the risk management plan and the **EU carriers and non-EU carriers** implement the actions laid down in Annex III, they shall do so in the following order of priority:

- (a) actions to prevent spills;
- (b) actions to contain spills to avoid them becoming a loss;
- (c) actions to clean up after a spill or loss.

**REGULATION (EU) 2025/2365 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL
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5.6. Economic operators, **EU carriers and non-EU carriers** shall have the following obligations:

- (a)** Ensure that their staff are trained according to their specific roles and responsibilities and that they are aware of and are able to use the relevant equipment and execute the procedures set out to ensure compliance with this Regulation; and
- (b)** **keep records of annually estimated quantities of losses and of the total quantities of plastic pellets handled.**

5.7. Where an action taken for the prevention, containment and clean-up of spills and losses fails, economic operators, EU carriers and non-EU carriers shall take corrective measures without delay.

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Annex III:

Measures to be taken and equipment to be put in place by EU carriers and non-EU carriers: (1) for prevention: verification, during and after loading and unloading, that plastic pellets are properly removed from the outside of the transport means and freight containers before leaving the installation, and that loading and unloading ramps of the transport means are closed when leaving the installation; clear communication on requirements concerning safe stowage;

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Annex III:

Visually checking the integrity of packaging of plastic pellets prior to the journey; ensuring that protective covers on, for example, forklifts/hydraulic equipment are used to prevent the piercing of packaging; prevention of any leakage during the transport journey, for example, by ensuring that the transport means are technically suitable and that freight containers are supplemented, if necessary, with appropriate sealing; regularly cleaning the loading compartments, the freight containers and trailers to minimise the loss of spilled plastic pellets; visually checking the openings and integrity of the loading compartments, freight containers and trailers to contain and minimise plastic pellet losses prior to and, to the extent possible, during the journey, including in the multimodal terminals, rail terminals, inland ports and seaports.

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Annex III:

(2) for containment and clean-up: where possible, repair damaged packaging during transport and contain the remaining plastic pellets in the loading compartment; collect the spilled plastic pellets in closed containers or bags for proper disposal; where plastic pellets are transported in bulk tanks, open the bottom manhole/cone of the silo tank only after entering the cleaning bay; replace the container liner only in suitable and non-public areas, where any spillage can be contained; notify the appropriate authorities, such as international and national emergency authorities or environmental authorities of the Member State where the loss occurred.

(3) equipment on board: at least one portable lighting device, hand tools (e.g. brooms, dustpans and brushes, buckets, repair tapes, etc.); closed collection containers/reinforced collection bags.

CEFIC SQAS 2025

CEFIC SQAS 2025 – OCS question updates

SQAS question 3.2.3

Are employees:

- informed about the evolution of the company's OCS programme? and
- encouraged to provide feedback on the company's OCS programme to the line management?

SQAS question 5.1.1.

...

Incidents resulting in loss of pellets to the environment should be recorded, investigated, and followed up.

...

SQAS question 11.6.1

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?

SQAS question 11.6.8.1

If the company is a freight forwarder, is the transport information created by the assessed company identifying the freight containers containing plastic pellets according to IMO Circular MEPC/909, item 1.2?

SQAQ question 11.6.8.2

Is the assessed company checking that the transport information identifies the freight containers containing plastic pellets according to IMO Circular MEPC/909, item 1.2?

Plastics Europe and CEFIC SQAS 2025

Plastics Europe (cooperation with EUPC (European Plastics Converters) OCS 2026 (certification) scheme -> full compliance with PPLR Eu regulation.

CEFIC SQAS 2025

OCS 2026 crosscheck to be reviewed in SQAS ???.

IMO circ – full compliance in SQAS 2025.

PPLR – full compliance needs to be checked.

REACH – reporting ok via incidents reporting in SQAS 2025 estimation model.

OCS CERTIFICATION

SQAS is not a certification system but an assessment system by an independent auditor. (governed by CEFIC)

The OCS certification has to be done by “certified/accredited” companies or bodies.

When SQAS OCS score is 100%.

One is entitled to appear on the public register. [OCS-Certification](#)

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Thank You

For you patience



Any Questions?