

1 Risk Assessment

Before accessing tank and bulk CTU tops, management of the packing and unpacking facilities and the transport companies should undertake a thorough risk assessment of the practices. Such assessments should cover:

1.1 Competence of operators

Operators should be fit for duty, having successfully completed all the training necessary to fulfil the legislative requirements and site requirements, in particular regarding the handling of dangerous goods.

1.2 Site Instructions

Site access requirements should be communicated to the hauliers and safety procedures communicated to the drivers upon arrival. Management should promote safety awareness and emphasize that it should be maintained, particularly during product handling. Management should ensure that loading /unloading operations are carried out under supervision.

1.3 Working at height

Safe conditions for working at heights should be provided, as discussed in section 3 of this annex.

1.4 Product Quality

The preferred option is product acceptance on the basis of a Certificate of Analysis. Taking samples from CTUs should be avoided. If the taking of samples is absolutely necessary, management should ensure that sampling is done by qualified site personnel or by appointed surveyors with adequate safety precautions taken.

1.5 Emergency preparedness

Necessary site safety equipment should be available at the loading and unloading locations, e.g.: fire extinguisher(s), eye wash, safety shower, first aid equipment, emergency escape routes, emergency stop, [decontamination](#) equipment, and absorbent materials.

1.6 Near miss and incident reporting

There should be a procedure to report all near misses, incidents, loading/discharge problems and unsafe situations or conditions, including follow-up. There should be a system in place to share information on important near misses, incidents or unsafe situations with all parties involved.