

OCS Certification Scheme – Rules & Principles –

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DRAFT

0. Introduction

Unintentional loss of plastic pellets can occur at all stages along the value chain despite the application of the current standard environmental, safety and quality management controls. The Operation Clean Sweep® (OCS) programme was developed by the industry to help companies tackle pellet leakage by providing a series of key recommendations.

By signing the European OCS pledge, each pellet-handling company recognises the importance of preventing spillages into the environment and the following six actions shall be a priority in the Company's Strategy:

1. Improve worksite set-up to prevent and address spills
2. Create and publish internal procedures to achieve zero industrial plastic material loss
3. Provide employee training and accountability for spill prevention, containment, clean-up and disposal
4. Audit performance regularly
5. Comply with all applicable state and local regulations governing industrial plastics containment
6. Encourage partners (contractors, transporters, distributors, etc.) to pursue the same goals.

The programme provides recommendations in the form of a manual on how to deliver against each of the six actions. This manual is based on collective learning and aims to support companies to achieve excellence in implementing the necessary measures, in accordance with their own specific set-up. Tools such as customisable checklists for both employees and managers to conduct site and equipment audits and OCS promotion materials such as posters, videos and flyers are also available on the [OCS website](#).

In 2020, EuPC, the association of European Plastics Converters, and PlasticsEurope, the association representing plastics manufacturers in Europe, committed to jointly develop by 2022 an OCS certification scheme aimed at controlling and documenting compliance with requirements targeting minimization of pellet loss across the entire plastic supply chain. It will also support the effective, harmonised and quantifiable implementation of the OCS programme.

This document summarises the founding principles of the OCS Europe Certification Scheme.

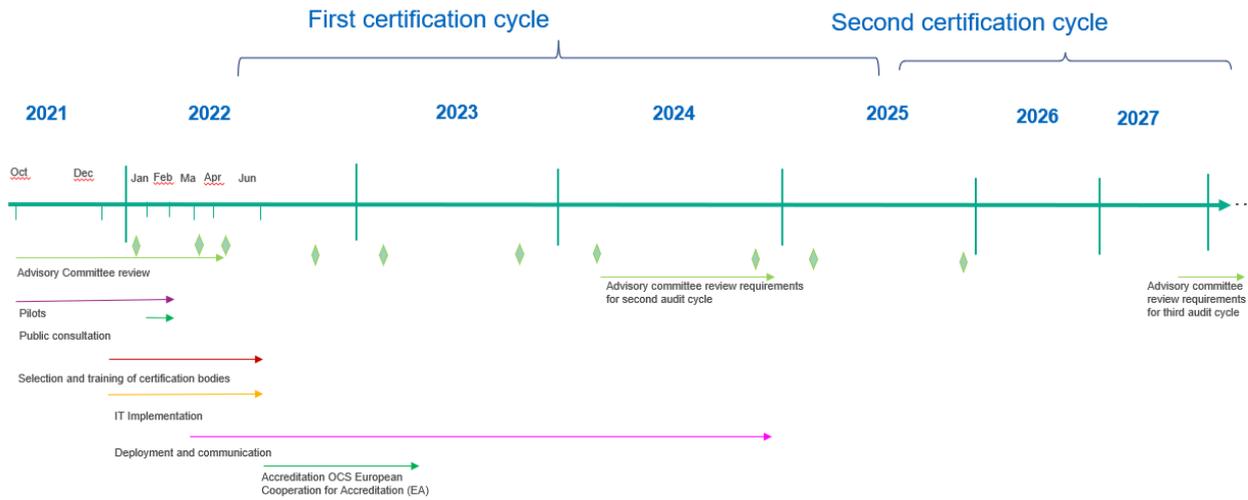
1. Scope

The OCS certification scheme is aimed at controlling and documenting the compliance of companies throughout the entire plastics supply chain with requirements on the prevention of plastic pellets, powders and flakes loss to the environment.

2. Scheme development and operation

The scheme development is organised in three years audit cycles. Requirements are reviewed for each audit cycle in a process involving the Technical Committee, Management Board and Supervisory Board. This process is initiated at least 1 year before the end of a "current" audit cycle.

Implementation plan of the OCS Certification Scheme



3. Governance

The Governance structure of the OCS EU certification scheme is composed of 3 bodies

OCS EU Supervisory Board

Composition: a multi-stakeholder group of representatives from industry, NGOs, policymakers and certification bodies. Its balanced composition ensures that no party can block the decision making of the Board, while ensuring its independence.

Remits:

- The OCS Supervisory Board takes decisions on critical aspects of the Scheme. This would consist in the approval criteria for new requirements, training, certification bodies and certification body accreditation and inclusion in the Scheme public register.
- The OCS Supervisory Board reviews feedback on the scheme implementation by auditors/certification bodies with a view of a consistent implementation and interpretation of the essential requirements. On a longer term, the Supervisory Board ensures the scheme implementation enables to reach an overall decrease of plastics pellet emissions, which may need adaptation of the requirements after the first audit cycle.

Decision making:

Members of the Supervisory Board strive to make decisions by consensus. In case no consensus may be reached, decisions are made by simple majority (50% of the votes + 1) provided a quorum of two-third of its members present or represented is reached.

Minority positions shall be documented on request of and made public in the minutes of the Supervisory Board meeting.

OCS EU Management Board

Composition: 2 voting representatives of each scheme owner (EuPC & Plastics Europe) + observers from the transport/logistics sector and CEFIC (Safety & Quality Assessment for Sustainability scheme in short SQAS) and other mutually recognized schemes

Remits:

It makes proposal for new requirements and organisation of the scheme, is responsible for day-to-day running of the scheme and administer funds allocated by Plastics Europe and EuPC.

Decision making: the Management Board will strive to reach consensus but in case of disagreement may decide by simple majority of its present or represented members provided a quorum of two-third of its members present or represented is reached

OCS EU Technical Committee

Composition: technical experts from the plastics value chain (producers, converters, transport/logistics/distribution). Additional members may be added upon review of their expertise by the Supervisory Board.

Remits:

- Develop the OCS Europe Core Requirements;
- Review the different OCS Europe Specific Requirements of each OCS Europe Certification Modules to ensure coherency;
- Participate in the testing of the software developed;
- Ensures a technical follow-up of the scheme to improve quality and consistency control and develop guidance/interpretation documents (see Annex I)
- Will provide technical advice during the review of the scheme at the end of each “audit cycle”.

Decision making: Decisions are made by consensus. In the occurrence that the Technical Committee cannot reach consensus, they will escalate the issue the Management and Supervisory Board as appropriate.

4. OCS Certification Documents

A. General

To be OCS certified, companies must demonstrate their compliance with the OCS Essential Requirements for management practices, procedures and key performance indicators documenting pellet loss control. These will be externally verified per facility by an certification body.

All OCS requirements are translated into auditable questions (OCS auditor Checklist) which include detailed information for both the auditor and the externally audited company on how to interpret it.

The English version is the master text. Authorised translations are available in several other languages and have been posted on the OCS website for downloading. In case of any doubt, reference should always be made to the English version.

B. OCS Essential Requirements

The OCS Essential Requirements are composed of the OCS Core Requirements and the OCS Specific Requirements.

C. OCS Core Requirements

Those are procedures, assessment steps, management system, training requirements and related key performance indicators (KPIs) which are common across all parts of the value chain. KPIs enable to quantify the implementation of the pellet/powder loss prevention measures.

D. OCS Specific Requirements

Each part of the value chain will also have its own specific OCS Europe Certification Module with measures, KPIs and potential targets. It is understood that measures and indicators might be module specific. It is understood that the pace at which OCS Europe Performance Targets are implemented may vary from module to module. Currently the following modules are envisaged:

- Module 1: OCS Europe Production covering plastics manufacturers and integrated compounders;
- Module 2: OCS Europe Masterbatching compounding and converting;
- Module 3: OCS Europe Transport and Logistics for companies that are not SQAS assessed;
- OCS Europe Transport and Logistics for SQAS assessed companies: it will be integrated in the current Transport Service, Tank Cleaning, Rail, Warehouse and Distributor SQAS modules.

5. Certification bodies & Auditors Requirements

Certification body:

The certificate in accordance with the OCS requirements should be issued by an independent Certification Body with technical competence in the plastic sector, able to demonstrate it through an accreditation issued by an IAF member accreditation body for product certification activities in accordance with ISO/IEC 17065 in the plastics sector and/or ISO/IEC 17021 for audit and certification of management systems in the plastics sectors (raw material producer/supplier, logistics/transport/cleaning, converters, recyclers...).

The certification bodies shall be contracted by the scheme owners.

It is the intention to have the scheme itself be accredited. For this purpose, an application will be made to European Accreditation <https://european-accreditation.org/>.

General criteria for an OCS Certification Auditor:

- Academic training: University / Bachelor degree of a technical nature (engineering, physics, chemistry or similar).

- Professional experience: Four years working for a Certification Body, of which at least two developing functions related to the conformity assessment of environmental/quality management and/or of plastic products. The auditor can be an employee of the Certification Body or can work as independent auditor for the Certification Body
- Knowledge of conformity assessment techniques: Having passed a training course of auditors of environmental/quality management systems (EN ISO 14001 and/or EN ISO 9001).
- Knowledge of European/national/local regulation related to pellet loss.
- Languages: the auditor must speak English + one of the national languages of the country where the audit is carried out.
- Experience in plastic value chain OCS evaluation:
 - ✓ Participating in at least two audits or inspections as observer in OCS certification audits.
 - ✓ Carrying out at least 1 audit in OCS certification practices. This audit will be supervised by a person with the corresponding qualification, who will complete a supervision form in which will reflect if, in his/her discretion, the candidate has the necessary technical competence to carry out the visit alone.
 - ✓ Attending a specific training course on the OCS certification carried out by an OCS licensee¹ entity and by the OCS scheme responsible at the certification body.

Control of auditors

It is the responsibility of certification bodies to control their auditors.

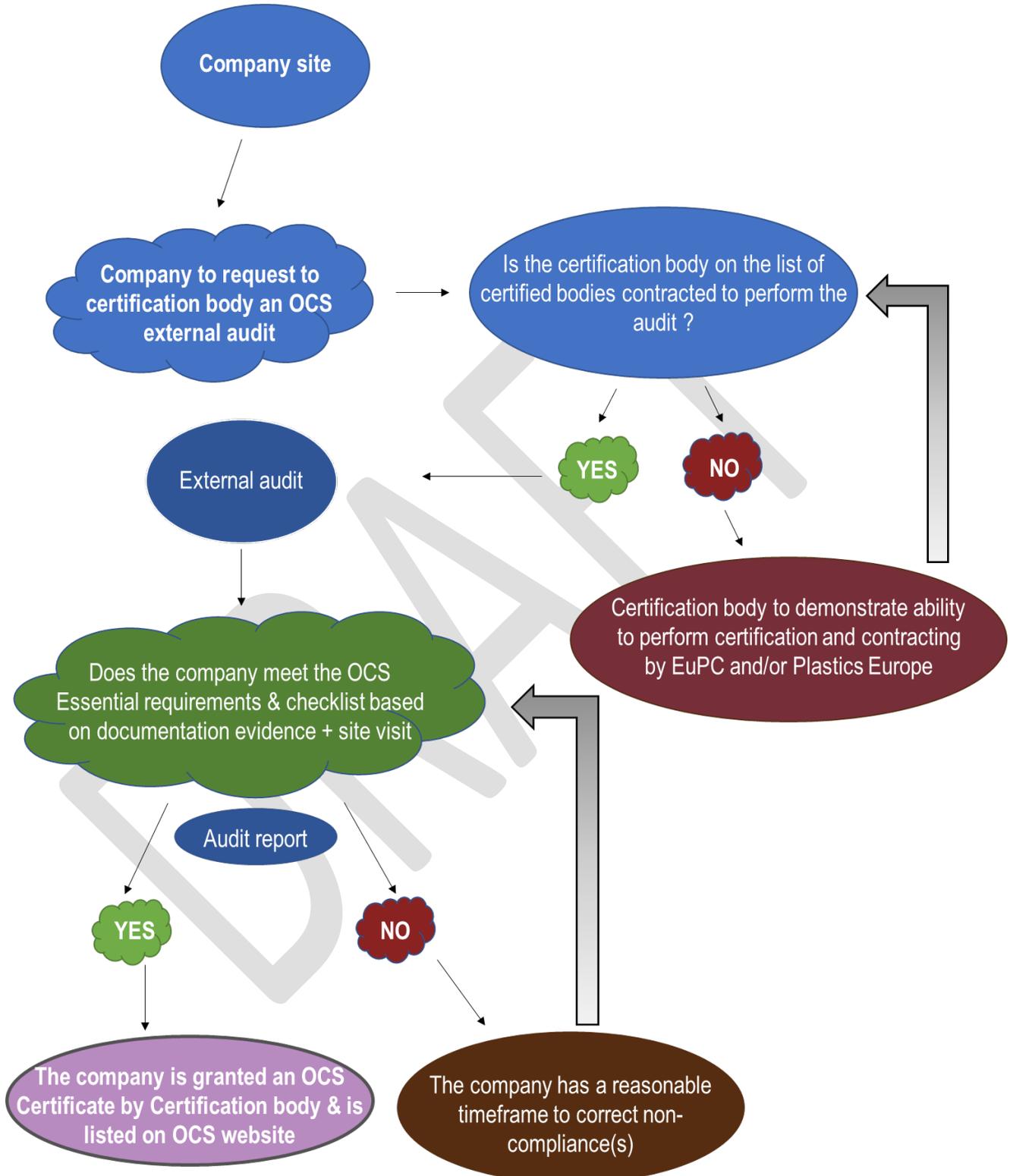
Control of certification bodies

It is the intention to have the OCS Europe scheme accredited as soon as possible so that the control of certification bodies may be done by an independent third party.

Before this accreditation may be obtained, it will be the Task of Scheme owners (PlasticsEurope and EuPC) to organize this control. During this interim period, such quality issues shall be brought to the attention of the Technical committee or Management Board as appropriate (see annex of this document).

¹ A list of all OCS licensees across Europe can be found here: xxx

6. Certification Process*



For Transport/logistics sector, please check <https://www.sqas.org>

*After the accreditation of the scheme, certification bodies will be accredited by National Accreditation bodies (see section 3).

A. Application process

When a company expresses its intention to obtain certification according to the OCS Europe Certification Scheme, it must complete the application that will be provided by the certification body² selected, accompanied by evidence of the company's adherence to the OCS programme, by providing their signed OCS pledge.

The request must be made by each production site where the company want to request a certification. The contract is made between the company and the selected certification body, including (but not limited to) the audit plan, dates of the site visit and the audit team designated for the external audit.

B. The external audit

The selected certification body will verify that the company has correctly implemented the best available techniques to achieve the OCS commitment. To this aim, the selected certification body will review the adequacy of the company with the OCS Essential Requirements by performing an external audit of the company site. Certification is awarded for each separate company site after external audit taking place at this specific site. The external audit is composed of 2 phases:

I. Documentary evaluation

To demonstrate its commitment towards the OCS programme, the company site should share with the auditor the following documents (non-exhaustive):

- The OCS pledge signed by the company.
- The declaration of the OCS programme as a priority by the top management and evidence if it is integrated in the site's strategy/Quality Plan...
- Pellet loss prevention performance objectives and evidence that they are communicated internally.
- A risk analysis about identification of potential spillages/losses within the site's boundaries.
- A risk minimisation plan to prevent and address spills including responsibilities, actions and due time.
- A programme for preventive maintenance of facilities and equipment.
- Written procedures, including:
 - A clear definition of what constitutes a pellet spill/loss incident
 - Description of roles and responsibilities and routines in case of a pellet spill/loss incident
 - Appropriate steps to prevent reoccurrence of pellet spill/ loss incidents
 - In case of an important pellet loss the facility shall have instructions to immediately collect the pellets loss in order to avoid the environmental impact.
 - Roles and procedures for informing the regulatory bodies (where permits require it),
 - Instructions for managing the clean-up, the use of the clean-up equipment and disposal of the pellets after a loss in order to prevent impact to the environment.
 - A clear definition for good housekeeping.

² A list of all certification bodies for the OCS Certification Scheme can be found here: xxx

- There shall be Housekeeping tours in place including routine inspections of the facility grounds in a defined frequency. Tours shall be documented, actions defined and followed up.
- Recording of incidents resulting in loss to the environment, including estimate of amount lost, and follow-up actions taken.
- Instructions and systems in place to effectively prevent and manage any potential loss of pellets to ensure that the potential loss of primary containment is minimized as far as reasonably possible.
- Records of OCS management review meetings.
- Verification of the existence and execution of a detailed training plan + record of training sessions based on the employees' specific roles and responsibilities.
- Drivers and subcontractor's awareness programme.
- Records of housekeeping tours.
- Records of internal audits and identified non-conformities, including:
 - the non-conformities
 - any action taken and future actions, including due dates
 - the investigation of the root causes of the non-conformity
 - the revision of the effectiveness of the corrective action
- Register of relevant legislation on pellet loss, including:
 - How the company stays abreast of all relevant legislation and legislative developments
 - How legislative changes are communicated internally
 - How legal requirements are complied with
 - How a regular review is made to evaluate legal compliance
- Evidence on how the company inform and promote with its business partners (e.g. service providers, transport, suppliers, customers, recyclers) the OCS programme to encourage them to pursue the same objectives on pellet loss prevention.
- Evidence of OCS Monitoring measurement, analysis and evaluation (internal to companies).
- Evidence of OCS Annual Reporting Requirements (to trade associations).

II. Evaluation of the implementation of measures in situ

Additionally, the certification body will check the correct implementation of the OCS programme based on the procedures and decisions taken by the company. All elements of this in situ evaluation are listed in the OCS checklist. Part of this verification will consist of verifying the implementation of all risk mitigation measures identified in the risk minimization plan, for example:

- The implementation of the necessary preventive, containment and cleaning/reaction measures, protocols and or procedures in the risk areas identified by the company within its risk minimisation plan to address spills.
- The quick and accessible availability of the necessary cleaning and collection means in the event of a pellet spill (brooms, brushes, dust collectors, vacuum cleaners, sweepers, etc.).
- The absence of pellets spilled in the facilities that cannot be due to the usual daily activity and whose collection is planned within the guidelines defined by the company within a specified period.
- The existence of retention grids and meshes in the entire sewer network of the plant defined by the company as susceptible to receiving pellet discharges.

Once the audit visit is finished, the selected certification body will prepare an audit report stating the non-conformities, observations, positive findings and opportunities for improvement identified during the audit, to be signed by the selected auditor. The OCS audit checklist should be an annexe to the audit report. The content of the audit report is confidential. Only the OCS audit checklist should be shared with the relevant trade association via the existing online data base.

In the case of detecting deviations, the company will have a period of 30 days to correct them, for which it must send a corrective action plan to the selected auditor of the certification body which will proceed to its study and evaluation.

C. Evaluation and award of the certificate

In view of the content of the audit report and, where appropriate, the corrective action plan provided, a technical review of the file will be carried out and the selected certification body will decide on the award of the OCS certificate.

In case the company successfully passed the external audit, the selected certification body will send to the company an OCS certificate valid for 3 years, subject to annual follow-up/control audit (see below section 5.7.). In the certificate, reference will be made to the code of adherence to the scheme and to the verification code assigned by the holder of the OCS rights³ and the expiration date of the certificate (3 years).

Once the certificate has been granted, the organization will refer to the OCS certificate by using the following logo:

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In case of denial, the reasons will be communicated to the organization and a deadline will be given for a new request.

D. Publication on the OCS Public Register

Once the company is awarded the OCS certificated, the name of the OCS certified company and site location for which the certification is awarded becomes then available on the OCS public register (OCS website). The following information are shown on the OCS Public Register:

Type of Data	Register Manager	Publicly Available	Publicly Searchable
Parent Company	✓	✓	✓
Company/ Business	✓	✓	✓
Site	✓	✓	✓
Country	✓	✓	✓

³ A list of all OCS licensees across Europe can be found here:

Size tes (based on tonnage bands) ⁴	✓	✓	×
Type of company	✓	✓	✓
Sector / Activity?	✓	✓	✓
Company Contact Details	✓	Generic details or website	×
Standard Audited against	✓	✓	×
Last audit date	✓	×	×
Certificate	✓	✓	×
Date of expiry of certificate	✓	✓	✓
Certification Body/ Auditor	✓	✓	✓
Alphabetically	✓	✓	✓
Combinations of the above	✓	✓	✓

The audit report is deemed confidential between the company audited and the auditor. It may contain sensitive commercial information. Use of a certification body and passing the audit is sufficient confirmation that the companies are meeting the expected requirements. This should be coupled with comprehensive auditor training and kept under review by the OCS Management Board to ensure satisfaction that auditors are able to verify OCS Essential Requirement in a consistent and stringent way.

Any private data such as individual contact details provided by companies to the Register should only be kept for as long as that contact is valid. If the contact details are changed then the previous details should be deleted to meet GDPR requirements.

Data, including that related to whether a company passes or fails an audit, should be kept for a minimum of 5 years. This will enable the Register Manager to determine whether a company is regularly failing and re-applying to join the Register. The Register Manager should keep records

⁴ The size of a site, following discussion with the industry, can be split into the following bands based on tonnage of pellets handled and avoids the need for absolute numbers.

- 0-100tes
- 100-1000tes
- 1000-10000tes
- 10000-100000tes
- 100000-250000tes
- >250000tes

of companies that have failed an audit, but this shouldn't be made public. Companies that have failed an audit should be removed from the public facing Register.

7. Validity, monitoring and renewal of the certificate

A. Follow-up audits

The validity of this certificate will be 3 years with an annual follow-up/control audit carried out during the first two years of validity of the certificate and a renewal audit before the expiration of the certificate in the third year.

The follow-up audits will be carried out in order to verify that the conditions that gave rise to the initial granting of said certificate are maintained and to ensure continuous improvement, through the correct implementation of the action plan proposed by the organization.

In the case of detecting non-conformities, the company will have a period of 30 days to correct them, for which it must send a corrective action plan to the certification body, which will proceed to study and evaluate them.

B. Renewal audit

The certification body will carry out a renewal audit every three years, in order to check whether the conditions that gave rise to the initial granting of said OCS certificate are maintained.

C. Removal from registry

When a site/company fails an audit and does not provide evidence of corrective action in due time, it will be removed from the public registry.

8. Changes in the scope of the certificate

The company must keep the certification body duly informed of those changes in the production processes that may affect compliance with the OCS Essential Requirements of this certification.

The certification body will study the information provided, deciding if a visit to the site is necessary prior to the modification of the OCS Certificate, and in view of the result of the technical review of the file, the certification body will decide on the modification of the OCS Certificate, proceeding to adapt it to the new situation.

9. Annual Reporting

A. To sectoral trade associations

The annual reporting includes the tracking of Key Performance indicators defined in the scheme, the evaluation of pellet loss and the recording of incidents resulting in losses to environment. This information is then compiled by the association and published in an annual report on a sectoral and National level within the limits of competition law compliance.

B. To auditor

Results of annual OCS Management Review

10. Definitions

List of concepts	Definition
Clean-up	Recovering pellets that have been lost or spilled
Compliance obligations	Legal requirements that an organization has to comply with and other requirements that an organization has to or chooses to comply with (Source: EN ISO 14001:2015)
Conformity	Fulfilment of a requirement (Source: EN ISO 14001:2015)
Containment	Retainment of spilled pellets to make sure they do not become a loss to the environment
Continual improvement	Recurring activity to enhance performance (Source: EN ISO 14001:2015)
Hierarchy of measures	System to reduce the risk of pellet loss to the environment, implementing procedures at each level with a goal to prevent pellet loss to the environment, in the order of priority of prevention, containment, then clean-up
Incident	Unwanted event resulting in spill/loss (accident and/or Near Miss)
Loss	Unwanted situation where pellets are lost OUTSIDE the operating boundary into the environment (e.g. water, soil...)
Management system	Set of interrelated or interacting elements of an organization to establish policies and objectives and processes to achieve those objectives (Source: EN ISO 20257-1:2020)
Near-miss	Incident where an unplanned event does not lead to a loss of pellets to the environment, but has the potential to do so <i>NOTE : An example of a near-miss is where a spill occurred (or almost occurs) that almost leads to a loss to the environment due to failures of one or more processes or containment measures.</i>
Non-conformity	Non-fulfillment of OCS Core requirements or compulsory specific requirements
OCS Europe Core Requirements	OCS common requirements to the entire plastics value chain
OCS Europe Essential Requirements	OCS Core Requirements + OCS Specific Requirements
OCS Europe Reporting Requirements	OCS requirements metrics to be annually reported to the relevant trade association

OCS Europe Specific Requirements	OCS specific to one part of the plastics value chain
Performance	Measurable result (Source: BS EN ISO 14001:2015)
Performance objective	Indicative level for the desired performance (Source: ISO 14224:2016)
Physical boundaries	Limit point of where land owned or controlled by the organization is legally recognized, including the point at which surface water drains and sewers discharge into the public sewer or controlled waters
Plastics pellets	<p><i>Mass of preformed moulding material, having relatively uniform dimensions, used as feedstock in plastic product manufacturing operations. (Source: EN ISO 472:2013+A1:2018 (modified))</i></p> <p><i>NOTE 1: throughout this document plastic pellets, powders, flakes and dust, including recycled material, are referred to as “pellets”</i></p> <p><i>a) Plastic powder: fine particulate matter that serves as a feedstock in plastic product manufacturing operations.</i></p> <p><i>b) Plastic flake: small flat shaped matter with regular or irregular form that serves as feedstock in plastic product manufacturing operations or plastic that has been shredded. Plastic flake can be manufactured or generated though the agglomeration of plastic dust or powder when plastics are processed.</i></p> <p><i>c) Plastic dust: fine particulate matter with irregular form and size, produced when plastics are manufactured, handled, conveyed, machined or processed.</i></p> <p><i>NOTE 2 Pellets are produced in many colours. Plastic pellets are also known as “granules” or “nurdles” and are normally spherical or lenticular in shape.</i></p> <p><i>NOTE 3 In some countries, plastic can also be termed “resin”.</i></p>
Plastic value-chain	All companies handling plastics pellets, including pellet manufacturers, transporters, logistic providers, distributors, tank cleaning stations, converters, good producers, recyclers, etc.
Prevention	Avoidance of spills or leaks
Spill	Unwanted situation where pellets are spilled INSIDE the operation boundary

Annex I: OCS external reporting, transfer of knowledge, consistency and quality control

The OCS scheme is a scheme in development subject to change on a frequent basis in the first years.

The scheme should mean different interdependent objectives. A series of “tools may be used to meet the objectives described below:

- 1) Transparency on the progress of the scheme and reporting on industry progress
- 2) Ensuring consistency in the interpretation and implementation of the scheme
- 3) Knowledge sharing and continuous learning, spread of best practices
- 4) Quality control

Whilst certification bodies are the main responsible to ensure the quality and consistency of the audit, an adequate support mechanism should be organized by which knowledge from industry experts/trade association made be transferred to certified bodies and vis and versa when the scheme evolves. One has to note that a reporting to trade association is foreseen on certain aspect of pellet loss prevention foreseen in the scheme and that regular surveys shall be organized by trade association in order to gain knowledge and transfer best practice across certified companies.

Certification process

The certification process is described in section 4 of the document rules and principles. The auditor evaluates the compliance with the OCS overall objective based on his knowledge of the industrial process to be certified, the review of documentary evidence and in situ check. He is assisted by a predefined auditor check list to guide his audit and the answer of this check list will be communicated in an IT system. However, the assessment of the auditor must focus on understanding whether the site is leaving up to the OCS pledge and actually implements measures aimed at minimizing risk of pellet loss. His performance is reviewed by the certification body which is responsible for issuing a certificate.

The OCS technical committee

The OCS technical committee is the forum through which transfer of knowledge maybe ensured. The technical committee for the time being is composed of industry experts and trade association representatives. In time certification bodies should be incorporated in this committee.

On a regular basis (every 6 months), the technical committee shall review the following:

- 1) Certification bodies report on specific issues regarding the implementation of the scheme/understanding
- 2) Trade association update on knowledge gained through survey/other feedback
- 3) Critical variations observed in the implementation of the scheme flagged by the IT system statistics are discussed such as recurring questions/comments in the “uploaded report” (see IT)

Two types of follow up actions might occur

- 1) Update of guidance/issue of new guidance/interpretation document to auditor and companies to be certified
- 2) In order to better understand an issue an audit with observer may be organized.

Training

Training is an integral part of the quality and transfer of knowledge system. Training material is regularly updated.

Both certification bodies and auditors must have attended a specific training course on the OCS certification carried out by an OCS licensee⁵ entity and by the OCS scheme responsible at the certification body. On a regular basis (yearly in the beginning, and then every two years or after a major review of the scheme) those certification bodies and auditors are retrained. It is the task of the certification bodies to train the auditor that cannot attend the training carried out by the OCS licensees.

Observers Task Force

Who? A pool of experts from industry (either trade association staff or company staff) /certification bodies that may act as observer in company audit.

Mission: The observer task is to observe audits, understand issues and inform (knowledge sharing, learning process, quality) as appropriate the Technical Committee and/or Management Board.

Auditors Independence: Observers may only make observations to be communicated to the technical committee, Management Board. They don't influence the result of an audit.

Compliance with competition law: Specific rules ensuring respect of competition law will be defined for "company" observers (i.e. they may in principle not observe competitors).

IT system

When an audit is performed, the auditor has to follow an auditor check list. Answers to this auditor check list are mainly Yes/No answers. The answers to those questions are uploaded in the system and are accessible to certification bodies and trade association.

Some comments field may be defined.

A global assessment conclusion box may be included as well.

Detailed recommendation to companies (the audit report and supporting documentation) are not uploaded in the system in order to protect confidential information.

Specific reporting element such as reporting on incident are foreseen (reported KPIs).

In addition, a reporting on the estimated/calculated pellet loss and quantity polymer processed/produced during a year might be added to the report to be uploaded in the It system intranet.

The website may generate statistics on the answers to those questions, yes/no, the values reported.... The statistics distinguish sectors and countries as well.

Those statistics may be used for 4 purposes

- 1) First and foremost, the statistics enable to understand areas of uncertainty/difficulty of implementation by the plants to be audited
- 2) Those statistics also enable the Trade association to proceed to external reporting (transparency or meeting regulatory obligations) and data analysis
- 3) Statistics enable Trade associations or certified bodies to understand/flag deviations in reporting to standard "profiles" (i.e. understanding atypical loss profiles, atypical auditors profiles: certification bodies only)

⁵ A list of all OCS licensees across Europe can be found here:

- 4) Statistics might alert Trade Associations (and in the future the accreditation body for the scheme) of deviations in certification “profile” of certain accreditation bodies

Certification bodies shall have access to the results of the check list by their auditors as well as OCS licensees scheme owners (trade associations) for their own membership.

In case a reporting system on pellet loss is put in place, it will be required that the auditor verifies

- 1) The correct application of sampling protocols for spills by the audited company
- 2) Whether or not mitigating barriers efficiencies correspond to standard efficiencies for those barriers. If not, this will be flagged and the assessment of the auditor explained in a comment field

In case a reporting scheme of pellet loss is setup, those 2 particular fields will be particularly scrutinized by the Trade Associations in a regular review.

Control of auditors

It is the responsibility of certification bodies to control their auditors.

Control of certification bodies

It is the intention to have the OCS Europe scheme accredited as soon as possible so that the control of certification bodies may be done by an independent third party.

Before this accreditation may be obtained, it will be the Task of Scheme owners (Plastics Europe and EuPC) to organize this control. During this interim period such quality issues shall be brought to the attention of the Technical committee or Management Board as appropriate.