



# OCS Certification Scheme

## Essential Requirements

This document gathers all Requirements (Core + Specific) that companies (site level) will have to meet in order to be OCS certified. It also includes the OCS checklist composed of the questions that will be asked to the companies by the auditor during the external audit.



0. Commit to making zero pellet, flake, and powder loss a priority	
OCS Core Requirement	
<p>1) The top management of the company shall sign the “Pledge to Prevent Resin Pellet, Flake and Powder Loss” and communicate it internally. By signing the pledge, the company will have its name listed on the OCS website.</p> <p>2) The OCS implementation and monitoring shall be a priority in the Company's Strategy*</p> <p>3) Pellet loss prevention performance objectives: the performance objectives shall be categorized according to the OCS pledge and the pellet loss hierarchy. They shall be internally communicated, followed up and reviewed during the annual management review (see OCS requirement 4.2)</p>	
OCS Checklist	Guidance
<p>1) Has the top management of the company signed the “Pledge to Prevent Resin Pellet, Flake and Powder Loss” and communicated it internally?</p> <p>2) Is the OCS implementation and monitoring a priority in the Company's strategy?</p> <p>3) Has the company defined OCS objectives and communicated them internally?</p>	<p>The auditor will check that the company is listed on the OCS website. The auditor will request to the company the OCS pledge signed. The auditor will interview the management of the company to check if they know and understand the OCS concept.</p> <p>The auditor will look for written evidence of the declaration of the OCS programme as a priority by the top management and check if it is integrated or mentioned in the Company's strategy/Quality Plan, for example...</p> <p>The auditor will check that:</p> <ul style="list-style-type: none"> <li>➤ the performance objectives are categorized according to the OCS pledge and the pellet loss hierarchy</li> <li>➤ they are communicated to people in charge</li> <li>➤ there is evidence of follow up (in meetings minutes, emails, site dashboard, etc.)</li> <li>➤ Are reviewed during the annual management review (see OCS requirement 4.3).</li> </ul>
OCS Specific Requirements	
<p>1. <u>Producers</u></p> <p>- Where applicable, the OCS Essential (Core + Specific) Requirements can be included in the Environment Management Systems of the company (e.g. ISO 14001...).</p>	



2. Converters

- Where applicable, the OCS Essential (Core + Specific) Requirements can be included in the Environment Management Systems of the company (e.g. ISO 14001...).

3. Transport/logistics

1. Improve worksite set to prevent and address spills	
OCS Core Requirement	
<p>1) A risk analysis about identification of potential spillages/losses shall be carried out, periodically reviewed and kept updated, containing:</p> <ul style="list-style-type: none"> <li>a) Locations where a pellet loss can occur from the facility boundary</li> <li>b) An analysis of the process to assess where and during which operation a spill/loss of pellets may occur.</li> <li>c) The assessment of the likelihood of a loss and its magnitude in order to assign the appropriate priority and “risk ranking”.</li> </ul> <p>2) A risk minimisation plan to prevent and address spills including responsibilities, actions and due time shall be implemented and kept updated. It will establish preventive, containment and cleaning/reaction measures, protocols and or procedures.</p> <p>3) The company shall have appropriate facilities and equipment to comply with the risk minimisation plan.</p> <p>4) The company will have a documented programme for preventive maintenance of facilities and equipment. Records of the implementation of the plan will be kept</p> <p>5) Employees shall have ready access to clean-up equipment</p> <p><u>OCS Monitoring measurement, analysis and evaluation (internal to companies)</u>            - % of identified risk locations where the risk has been managed - Risk minimisation methodology (bowtie or equivalent) is used as indicator</p> <p><u>OCS Annual Reporting Requirements (to trade associations)</u>            - % of identified risk locations where the risk has been managed            - Estimation of pellet loss based on the Risk minimization methodology and guidance (the methodology should be approved and compliant with ECHA microplastics restriction -&gt; to be confirmed during regulatory process).</p>	
OCS Checklist	Guidance
<p>1) Has a risk analysis about identification of potential spillages/losses being carried out, periodically reviewed, and kept updated?</p> <p>The risk analysis must contain:</p> <ul style="list-style-type: none"> <li>a) Locations where a pellet loss can occur on the facility boundary</li> <li>b) A root-cause analysis of the process to assess where and during which operation a loss of pellets, powder and flakes may occur.</li> </ul>	<p>The auditor will check documentary evidence that the risk analysis was carried out.</p> <p>A site map including the identification of the places where spill/losses can happen must be available. The auditor will use the map for the visit to the plant.</p> <p>The risk analysis will be kept updated, especially when changes in the process occur.</p>

<p>c) The assessment of the likelihood of a loss and its magnitude in order to assign the appropriate priority and “risk ranking”</p> <p>2) Does the company have a risk minimization plan to prevent and address spills, including responsibilities, actions, and due time?</p> <p>a) Is the plan implemented and kept updated?</p> <p>b) Does it establish preventive, containment and cleaning/reaction measures, protocols and or procedures?</p> <p>3) Does the company have internal KPI on:</p> <p>a) The % of identified risk locations where the risk is managed</p> <p>The estimation of pellet loss based on the Risk minimization methodology (bowtie model)</p> <p>4) Does the company have appropriate facilities and equipment to comply with the risk minimization plan?</p> <p>5) Does the company have a documented programme for preventive maintenance of facilities and equipment?</p> <p>6) Do employees have ready access to clean-up equipment?</p>	<p>The risk analysis will clearly identify the places where the higher risk of pellet loss can happen.</p> <p>The auditor will check documentary evidence of the plan.</p> <p>The auditor will look for documentary evidence and report the numeric value into the checklist.</p> <p>The auditor will check during the site visit using the site map mentioned in 1.1</p> <p>The auditor will check that the documented plan is complied with. He/she will select an audit sample of the maintenance carried and will request records of them (maintenance sheets, invoices of jobs done, etc.).</p> <p>The auditor will check during the site visit.</p>
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<p>OCS Specific Requirements</p>	
<p>1. <u>Producers</u></p> <ul style="list-style-type: none"> <li>- Production sites are strongly encouraged to use the bowtie model (or equivalent tools)</li> <li>- Production sites should have a system in place for: <ul style="list-style-type: none"> <li>- inspection &amp; cleaning of trucks leaving the site</li> <li>- outgoing water facilities</li> <li>- Inspection of fences in the surroundings of the sites that are in public areas when applicable</li> </ul> </li> </ul> <p>2. <u>Converters</u></p> <ul style="list-style-type: none"> <li>- Converting and compounding sites are strongly encouraged to use the bowtie model (or equivalent tools)</li> </ul>	



Compulsory: 'The risk mapping exercise shall at the minimum address typical critical spill point and emission location (sewage, roof, fence) contained in the "converters and compounders check list" (when applicable to the plant being audited).

3. Transport/logistics



**2. Create and publish internal procedures to achieve zero pellet loss goals**

**OCS Core Requirement**

- 1) The facility shall have documented procedure(s) in place 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.
  - 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.
  
- 2) Incidents resulting in loss to the environment shall be recorded, investigated and followed up.
  
- 3) The facility shall have instructions and systems in place to effectively prevent and manage any potential loss of pellets in order to ensure that the potential loss of primary containment is minimized as far as reasonably possible.
  
- 4) The following items shall be followed-up and reviewed by relevant management meetings
  - Actions from incidents
  - Housekeeping status
  - Effectiveness of preventive measures
  - Effectiveness, adequacy and suitability of procedures, equipment and instructions

OCS Monitoring measurement, analysis and evaluation (internal to companies)

- Number and volume of incidents resulting in unrecovered release (loss)of plastic pellets, flakes, powders, or granules, within the physical custody of a company, from containment to ground or water outside member-operated facilities and estimated to be greater than 0.5 litres or 0.5 kilograms per incident.
- % of spillage incident where action has been executed to avoid reoccurrence

OCS Annual Reporting Requirements (to trade associations)

- Number and volume of incidents resulting in any unrecovered release (loss) of plastic pellets, flakes, powders, or granules, within the physical custody of a company, from containment to ground or water outside member-operated facilities and estimated to be greater than 0.5 litres or 0.5 kilograms per incident.

OCS Checklist	Guidance
1) Does the facility have a documented procedure(s) in place covering?	No guidelines. Self-explanatory

<p>a) The description of roles and responsibilities and routines in case of a pellet loss incident</p> <p>b) Appropriate steps to prevent reoccurrence of pellet loss incidents</p> <p>c) instructions to immediately collect the pellets loss to avoid the environmental impact, in case of an important pellet loss</p> <p>d) Roles and procedures for informing the regulatory bodies (where permits require it)</p> <p>e) Instructions for managing the clean-up, the use of the clean-up equipment and disposal of the pellets after a loss to prevent impact to the environment.</p> <p>f) A clear definition for good housekeeping</p> <p>2) Are incidents resulting in loss to the environment recorded, investigated, and followed up?</p> <p>3) Does the facility have 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?</p> <p>4) Are the following items followed-up and reviewed by relevant management meetings?</p> <p>a) Actions from incidents</p> <p>b) Housekeeping status</p> <p>c) Effectiveness of preventive measures</p> <p>d) Effectiveness, adequacy and suitability of procedures, equipment, and instructions</p> <p>5) Does the company have an internal KPI on: Number and estimated volume of incidents of any unrecovered release of plastic pellets, flakes, powders, or granules, within the physical custody of a company, from containment to ground or water outside member-operated facilities</p>	<p>The auditor will ask for an audit sample of incidents, investigation of root causes, corrective actions and follow up</p> <p>The auditor will check documentary evidence and will confirm during the site visit</p> <p>The auditor will check documentary evidence. This could also be included in the Management Reviews required in OCS requirement item 4.3</p> <p>The auditor will look for documentary evidence and report the numeric value into the checklist.</p>
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OCS Specific Requirements
None

3. Provide employee training and accountability for spill prevention, containment, clean-up and disposal	
OCS Core Requirement	
<p>The organization shall determine the training needs associated to the OCS programme based on the employees' specific roles and responsibilities. The organization shall provide a training program for all personnel working on site that will result in individual training plans. Records of both the plan and training sessions will be kept showing that the plan was implemented. The implementation of the training plan shall be reviewed annually.</p> <p>The following subjects have to be included in the plan:</p> <ul style="list-style-type: none"> <li>- awareness and accountability for spill prevention, containment, clean-up and disposal.</li> <li>- written procedures to prevent, contain, clean-up and dispose spills</li> </ul> <p>The training shall include theory and practical hands on exercises. Employees shall be informed about the evolution of the OCS programme. Records of the information provided will be kept.</p> <p>Drivers and subcontractors should be included in the awareness programme. External organizations for which the drivers and subcontractors work are responsible for ensuring the competence of their personnel.</p> <p>Employees shall be encouraged to provide feedback on the OCS programme.</p> <p><u>OCS Monitoring measurement, analysis and evaluation (internal to companies)</u></p> <ul style="list-style-type: none"> <li>- Percentage of relevant* employees and contractors dealing with pellets receiving operating training</li> </ul> <p>*To be defined by each company or site</p>	
OCS Checklist	Guidance
1) Has the organization determined the training needs associated to the OCS programme based on the employees' specific roles and responsibilities?	The auditor will ask for an organigram, will select some employees and will ask for the description of their roles and responsibilities.
2) Does the organization provide a training programme for all personnel working on site that will result in individual training plans?	The auditor will ask for records of both the plan and training sessions. The training plan should be reviewed annually.
3) Are the following subjects included in the plan?	The auditor will ask for documentary evidence.



<p>a) awareness and accountability for spill prevention, containment, clean-up, and disposal</p> <p>b) written procedures to prevent, contain, clean-up and dispose spills</p> <p>4) Does the training plan include theory and practical hands on exercises when applicable?</p> <p>5) Are employees informed about the evolution of the OCS programme?</p> <p>6) Are drivers and subcontractors included in the awareness programme?</p> <p>7) Are employees encouraged to provide feedback on the OCS programme?</p> <p>8) Does the company have an internal KPI on: Percentage of relevant* employees and contractors dealing with pellets receiving operating training</p>	<p>The auditor will ask for documentary evidence and will confirm with employees during the site visit.</p> <p>The auditor will check that records of the information provided are kept and will check during the site visit.</p> <p>External organizations for which the drivers and subcontractors work are responsible for ensuring the competence of their personnel. If drivers and/or subcontractors are present during the site visit the auditor will interview them.</p> <p>Records of these communications will be kept.</p> <p>*To be defined by each company or site</p>
<b>OCS Specific Requirements</b>	
None	



#### 4. Audit our performance regularly

##### OCS Core Requirement

1) There shall be housekeeping tours in place including routine inspections of the facility grounds with a defined frequency. Tours shall be documented, actions defined and followed up.

2) The company shall have a procedure to document and carry out internal audits that covers:

- The effectiveness of the procedures to avoid and mitigate pellet loss
- The planned intervals to carry out the audits. These intervals will depend on the outcome of the previous audit(s) and the relevance that for the company has the activities being audited
- The compliance of the routine inspection plan inside and outside its physical boundaries and its effectiveness
- The training and or competence of the internal auditors
- The independence of the internal auditors
- The actions for non-conformities identified in the audits
- The records of the audits

3) The management of the company will hold a formal management review meeting at least once a year to review the OCS management system that shall include, as minimum, the following inputs:

- The status of actions of previous Management review meetings
- The monitoring of KPIs trends
- The degree of implementation and effectiveness of the training plan
- The Outcome of internal and external OCS audits
- The status of the regulatory compliance with regulations governing pellet containment
- The extent of which OCS objectives have been met
- Recommendations for continual improvement

The senior management of the company shall consider the recommendations of the Management review and will define an improvement action plan with allocated resources and due dates

4) Nonconformity: (Note: based on ISO 14001, item 10.2)

When a nonconformity happens the company:

- shall take action(s) to control it, correct it and attenuate its impact.
- shall investigate the root causes that produced the nonconformity in order to avoid its recurrence on the site or elsewhere

If needed, a corrective action shall be taken to eliminate the root cause(s) that produced the non conformity. The corrective action shall be proportionate to the relevance of the non conformity impact.

The company shall review the effectiveness of the corrective action.

Records shall be maintained of:

- the nonconformities

- any action taken and future actions, including due dates
- the investigation of the root causes of the nonconformity
- the revision of the effectiveness of the corrective action

OCS Monitoring measurement, analysis and evaluation (internal to companies)

- % of programmed/planned OCS inspection/self-assessment that have been executed
- Percentage of identified nonconformities being closed since the last audit? (Action completion rate).

OCS Checklist	Guidance
<p>1) Are there housekeeping tours in place including routine inspections of the facility grounds with a defined frequency?</p>	<p>The auditor will check that the tours are documented, actions defined and followed up. The auditor will confirm during the site visit.</p>
<p>2) Does the company have a procedure to document and carry out internal audits that covers?</p> <p>a) The effectiveness of the procedures to avoid and mitigate pellet loss</p> <p>b) The planned intervals to carry out the audits. These intervals will depend on the outcome of the previous audit(s) and the relevance that for the company has the activities being audited</p> <p>c) The compliance of the routine inspection plan inside and outside its physical boundaries and its effectiveness</p> <p>d) The training and or competence of the internal auditors</p> <p>e) The independence of the internal auditors</p> <p>f) The actions for non-conformities identified in the audits</p> <p>g) The records of the audits</p>	<p>The auditor will check that the audit plan covers all aspects of the OCS programme. During the site visit the auditor will check the cleanup status of the site inside and outside the physical boundaries.</p>
<p>3) Does the management of the company hold a formal management review meeting at least once a year to review the OCS management system include, as minimum, the following inputs?</p> <p>a) The status of actions of previous Management review meetings</p> <p>b) The monitoring of KPIs trends</p> <p>c) The degree of implementation and effectiveness of the training plan</p>	<p>No guidelines. Self-explanatory.</p>

<p>d) The Outcome of internal and external OCS audits</p> <p>e) The status of the regulatory compliance with regulations governing pellet containment</p> <p>f) The extent of which OCS objectives have been met</p> <p>g) Recommendations for continuous improvement</p> <p>4) Does the senior management of the company consider the recommendations of the Management review and define an improvement action plan with allocated resources and due dates?</p> <p>5) a) When a nonconformity happens, does the company:</p> <ul style="list-style-type: none"> <li>➤ take action(s) to control it, correct it and attenuate its impact?</li> <li>➤ investigate the root causes that produced the non-conformity to avoid its recurrence on the site or elsewhere?</li> </ul> <p>take corrective action to eliminate the root cause(s) that produced the non-conformity?</p> <p>5) b) If a corrective action is issued, is it proportionate to the relevance of the non-conformity?</p> <p>5) c) Is the effectiveness of the corrective action reviewed?</p> <p>5) d) Are records maintained of:</p> <ul style="list-style-type: none"> <li>➤ the non-conformities</li> <li>➤ any action taken and future actions, including due dates</li> <li>➤ the investigation of the root causes of the non-conformity</li> <li>➤ the revision of the effectiveness of the corrective action</li> </ul> <p>6) Does the company have an internal KPI on: - % of programmed/planned OCS inspection/self-assessment that have been executed</p>	<p>No guidelines. Self-explanatory.</p> <p>No guidelines. Self-explanatory.</p> <p>The auditor will discuss with the company representative the criteria to issue the corrective action.</p> <p>No guidelines. Self-explanatory.</p> <p>No guidelines. Self-explanatory.</p> <p>The auditor will look for documentary evidence.</p>
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- Percentage of identified nonconformities being closed since the last audit? (Action completion rate)	
OCS Specific Requirements	
None	

5. Comply with all applicable local and national regulations governing pellet containment	
OCS Core Requirement	
<p>The company shall have a procedure related to legal requirements governing pellet containment that includes:</p> <ul style="list-style-type: none"> <li>- How the company stays abreast of all relevant legislation and legislative developments</li> <li>- How legislative changes are communicated internally</li> <li>- How legal requirements are complied with</li> <li>- How a regular review is made to evaluate legal compliance</li> </ul> <p>The company will keep records of the legal compliance review</p>	
OCS Checklist	Guidance
<p>1) Does the company have a procedure related to legal requirements governing pellet containment that includes?</p> <ul style="list-style-type: none"> <li>➤ How the company stays abreast of all relevant legislation and legislative developments</li> <li>➤ How legislative changes are communicated internally</li> </ul>	<p>The auditor will look for documentary evidence in the form of an up-to-date register of relevant legislation. If (a) person(s) is (are) formally designated, this responsibility should be clearly described in a job description. If an external source is used, there should be clear evidence of a contract, exchange of letters or some other form of written understanding, specifying the service to be provided, when and to whom within the Company</p> <p>The auditor will ask the company for examples of changes in legislation which happened during recent years if a new audit, and the last 3 years if a re-assessment, and check how the company implemented them. The auditor will look for documentary evidence of implemented changes. The auditor will look also for</p>



<ul style="list-style-type: none"><li>➤ How legal requirements are complied with</li> <li>➤ How a regular review is made to evaluate legal compliance</li></ul>	<p>communication/information to (relevant) employees.</p> <p>The auditor will look for evaluation documents and follow up of identified actions if any.</p> <p>The auditor will ask the company about records of the legal compliance review.</p>
<b>OCS Specific Requirements</b>	
None	



6. Encourage partners to pursue the same objectives	
OCS Core Requirement	
<p>The facility* shall inform and promote with its business partners (e.g. service providers, transport, suppliers, customers, recyclers) throughout the value chain in order to encourage them to pursue the same objectives on pellet loss prevention.</p> <p><u>OCS Monitoring measurement, analysis and evaluation (internal to companies)</u>            - % of relevant pellet handling business partners with whom you promoted pellet loss awareness and the OCS programme?</p>	
OCS Checklist	Guidance
<p>1) Does 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?</p> <p>2) Does the company have an internal KPI on:            - % of relevant pellet handling business partners with whom you promoted pellet loss awareness and the OCS programme?            - % of contract(s) where there is an OCS clause with relevant pellet handling supplier?</p>	<p>The auditor will look for documentary evidence of this communication.</p> <p>The auditor will look for documentary evidence.</p>
OCS Specific Requirements	
None	