

OCS EUROPE  
CERTIFICATION SCHEME

# Rules & Principles

## Version 1.0

Created by Plastics Europe and European Plastics Converters.

This document is subject to future review and potential update(s). The first review will take place after one year of implementation.

Applicable up-to-date version of the document is available on the website of Operation Clean Sweep ([www.opcleansweep.eu](http://www.opcleansweep.eu)) and the dedicated website for the OCS Europe Certification scheme ([www.ocscertification.eu](http://www.ocscertification.eu)).

Operation Clean Sweep® is a trademark of PLASTICS industry association.

The Certification Scheme is built on the principles of Operation Clean Sweep® programme and will be hereafter referred to as OCS Europe Certification Scheme.

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**OCS EUROPE  
CERTIFICATION SCHEME**  
CREATED BY  
**PLASTICS EUROPE &  
EUROPEAN PLASTICS  
CONVERTERS**



# 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 facility recognises the importance of preventing spillages into the environment that shall be a priority in the Facility's Strategy by implementing the following six actions:

- 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 promotion materials such as posters, videos and flyers are also available on the [Operation Clean Sweep website\\*](#).

In 2020, EuPC, the association of European Plastics Converters, and Plastics Europe, the association representing plastics manufacturers in Europe, committed to jointly develop by 2022 a certification scheme based on the principles of Operation Clean Sweep programme 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 Operation Clean Sweep programme. The certification scheme has been developed together in consultation with Industry experts, trade associations, NGOs, policy makers and certification bodies. In May 2022, a public consultation was conducted to gather feedback from various stakeholders. Plastics Europe and EuPC will target the maximum coverage of the certification within their membership.

This document summarises the founding principles of the OCS Europe Certification Scheme. The Requirements document consists of the set of requirements to comply with in order to be OCS Europe certified. Supplementary to the requirements, Guidance on Risk Analysis, Best Practices and Risk Minimization has also been developed. The scheme, as described in that document, including Requirements, will be reviewed after 1 year of implementation, and possibly amended where needed. Updated versions of the documents will be available on the website of Operation Clean Sweep ([www.opcleansweep.eu](http://www.opcleansweep.eu)) and the dedicated website for the OCS Europe certification scheme ([www.ocscertification.eu](http://www.ocscertification.eu)).

\*Please note that a dedicated website for the OCS Europe Certification scheme ([www.ocscertification.eu](http://www.ocscertification.eu)) exists apart from the Operation Clean Sweep programme website ([www.opcleansweep.eu](http://www.opcleansweep.eu)).

# 1. Scope

The OCS Europe 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. In case changes to requirements would be deemed necessary in the course of an audit cycle for the adequate implementation of the scheme or its accreditation, such changes would be proposed by the Technical Committee and approved by the Supervisory Board. During the 1<sup>st</sup> audit cycle, a review will be carried out one year of implementation of the scheme.

## 3. Governance

The Governance structure of the OCS Europe certification scheme is composed of 3 bodies. Minutes of the meetings of all committees will be made publicly available.

### SUPERVISORY BOARD



#### Composition

A multi-stakeholder group of representatives from industry, 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 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's public register.

The Supervisory Board reviews feedback on the scheme implementation by auditors/certification bodies with a view of a consistent implementation and interpretation of the requirements. The Supervisory Board ensures the scheme implementation enables to reach an overall decrease of plastics pellet emissions through continuous improvement towards the goal of zero pellet losses. The Supervisory Board will ensure development of the scheme to reach across the supply chains in order to achieve loss reduction.



#### Decision making

Members of the Supervisory Board strive to make decisions by consensus. In case no consensus may be reached, decisions are made by a majority vote with a minimum of 2/3 votes with a quorum of 50%.

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

## MANAGEMENT BOARD



### Composition

Two voting representatives of each scheme owner (EuPC & Plastics Europe) + observers from the association representing transport/logistics sector and CEFIC (Safety & Quality Assessment for Sustainability scheme in short SQAS\*) and other mutually recognized certification schemes.



### Remits

It makes proposal for new requirements and organization of the scheme, is responsible for day-to-day running of the scheme and administers 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.

(\*) SQAS is a third-party assessment system of logistics service providers and distributors managed by Cefic since 1992. The assessments are carried out by a network of more than 60 independent European auditors and the assessment reports are uploaded into a database: [www.sqas.org](http://www.sqas.org)

## 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 develop guidance/ interpretation documents and when necessary, propose modifications to requirement (see Annex I);
- Will provide technical advice during the review of the scheme at the end of each "audit cycle";
- The Technical Committee reports to the Management and Supervisory Board.



### Decision making

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

# 4. OCS Europe Certification documents

## A. GENERAL

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

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

The English version is the master text. Authorised translations are available in several other languages on the OCS Europe certification website for downloading (include webpage link). In case of any doubt, reference should always be made to the English version.

## B. REQUIREMENTS

The OCS Europe Certification Requirements are composed of the Core Requirements and the Specific Requirements.

## C. 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. 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. Currently the following modules are envisaged:

- Module 1: OCS Europe Production covering plastics manufacturers and integrated compounders;
- Module 2: OCS Europe Master-batching compounding and converting;
- Module 3: OCS Europe Transport and Logistics companies (still to be developed).

# 5. Certification bodies & Auditors Requirements

## A. CERTIFICATION BODY

The certificate in accordance with the OCS Europe Certification 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 International Accreditation Forum (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, when appropriate, an application will be made to European Accreditation <https://european-accreditation.org>.

General criteria for an **OCS Europe 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 in 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 Europe Certification evaluation\*:**
  - Participating in at least two audits or inspections as observer in OCS Europe 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.

\*This requirement shall apply to the lead auditor or the auditor who intends to train future auditors.

- Attending a specific training course on the OCS Europe certification carried out by an OCS licensee<sup>1</sup> entity and by the OCS Europe scheme responsible at the certification body.

## **B. CONTROL OF AUDITORS**

It is the responsibility of certification bodies to control the performance of the activities carried out by their auditors.

## **C. CONTROL OF CERTIFICATION BODIES**

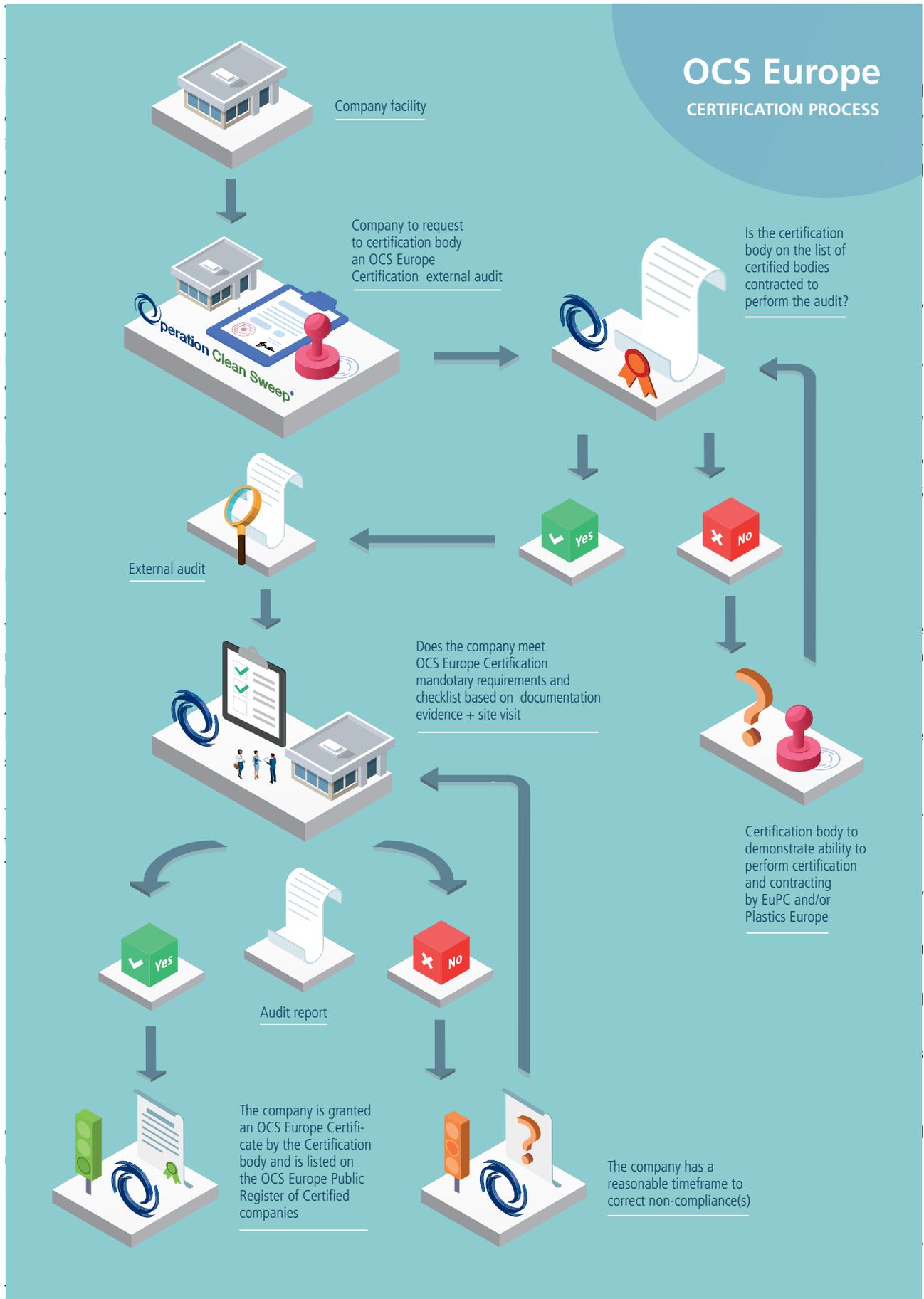
It is the intention to have the OCS Europe scheme accredited as soon as possible so that the control of certification bodies may be done by an independent third party.

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 and/or Management Board as appropriate and be reported to the Supervisory Board (see annex I of this document).

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

<sup>1</sup>A list of all Operation Clean Sweep licensees across Europe can be found here: xxx

# 6. Certification Process



## A. APPLICATION PROCESS

When a facility 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 body<sup>2</sup> selected, accompanied by evidence of the facility's adherence to the Operation Clean Sweep programme, by providing their signed Operation Clean Sweep pledge.

The request must be made by each facility where the company want to request a certification. The contract is made between the facility 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 facility has correctly implemented the best available techniques to achieve the OCS commitment. To this aim, the selected certification body will review the facility's conformity with the OCS Europe Requirements by performing an external audit. Certification is awarded for each facility of a company after external audit has taken place at this specific facility provided that all the mandatory Requirements are met. The external audit is composed of 2 phases:

### I. Documentary evaluation

To demonstrate its commitment towards the Operation Clean Sweep programme, the facility should share with the auditor the following documents (non-exhaustive):

- The blueprint of the facility or any other kind of information on the constitution of the facility being audited should be shared with the auditor prior to the audit.
- The Operation Clean Sweep pledge signed by the facility.
- The declaration of the Operation Clean Sweep programme as a priority by the top management and evidence if it is integrated in the site's strategy/Quality Plan.
- Implementation of awareness programme for employees, subcontractors and other actors
- Pellet loss prevention performance objectives and evidence that they are communicated internally.
- A risk analysis about identification of potential spillages/losses within the facility'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 used for pellet loss prevention.
- Written procedures, including:
  - The description of roles and responsibilities and routines in case of a pellet spill/loss incident
  - Appropriate steps to prevent reoccurrence of pellet loss incidents
  - Instructions to immediately collect the pellets after an incident to avoid the environmental impact, in case of an incident
  - 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 an incident to prevent impact to the environment.
  - A clear definition for good housekeeping
- 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 spill of pellets to ensure that the potential loss of primary containment is minimized as far as reasonably possible.
- Records of Operation Clean Sweep 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.
- Records of housekeeping tours.

<sup>2</sup>A list of all certification bodies for the OCS Europe Certification Scheme can be found here: xxx

- Records of internal audits and identified non-conformities, including:
  - Potential risk points mapping
  - 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 facility 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 facility informs and promotes initiatives towards zero pellet loss with its business partners throughout the value chain (e.g., raw material and service suppliers, customers) in order to encourage them to pursue the same objectives on pellet loss prevention.
- Evidence of Monitoring measurement, analysis and evaluation (internal to companies).
- Evidence of 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 Operation Clean Sweep programme based on the procedures and decisions taken by the facility. All elements of this in situ evaluation are listed in the OCS Europe audit 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 facility 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 existence of retention grids and meshes in the entire sewer network of the facility defined by the facility as susceptible to receiving pellet discharges.

Once the audit visit is finished, the 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 auditor. The audit checklist should be an annexe to the audit report. The content of the audit report is confidential. Only the answers to the OCS audit checklist should be shared with the relevant trade association via the OCS Europe Certification Intranet.

In the case of non-conformity, the facility will have a period of 30 days to provide evidence of corrective actions or to send a corrective action plan to the auditor of the certification body which will proceed to its study and evaluation. In control audits, the auditor will check the progress of implementation of the corrective action plan through appropriate documentary evidence. Failure to implement the corrective action plan will result in revoking of the certification.

## 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 Europe certificate.

In case the facility successfully passed the external audit, the selected certification body will send to the facility an OCS Europe certificate valid for 3 years after the date of the audit in site, subject to annual control audit (see below section 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 rights<sup>3</sup> and the expiration date of the certificate (3 years).

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

<sup>3</sup>A list of all certification bodies for the OCS Certification Scheme can be found here: xxx

## D. PUBLICATION ON THE OCS EUROPE PUBLIC REGISTER OF CERTIFIED FACILITIES

Once the facility is awarded the OCS Europe certificate, the name and location of the OCS Europe certified facility for which the certification is awarded becomes then available on the OCS Europe Public Register (in OCS Europe certification website).

The following information are shown on the OCS Europe Public Register:

TYPE OF DATA	REGISTER MANAGER	PUBLICLY AVAILABLE	PUBLICLY SEARCHABLE
Parent Company	✓	✓	✓
Company/ Business	✓	✓	✓
Facility	✓	✓	✓
Country	✓	✓	✓
Size tonnes (based on tonnage bands) <sup>4</sup>	✓	✓	X
Type of company	✓	✓	✓
Sector / Activity	✓	✓	✓
Company Contact Details	✓	Generic details or website	X
Standard Audited against	✓	✓	X
Last audit date	✓	✓	X
Certificate	✓	✓	X
Date of expiry of certificate	✓	X	✓
Certification Body/ Auditor	✓	✓	✓

<sup>4</sup> 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.

- 0-50 tonnes
- 50-100 tonnes
- 100-1000 tonnes
- 1000-10000 tonnes
- 10000-100000 tonnes
- 100000-250000 tonnes
- >250000 tonnes

The audit report is deemed confidential between the facility 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 Europe Certification Requirements 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 facility passes or fails an audit, should be kept for a minimum of 5 years. This will enable the Register Manager to determine whether a facility is regularly failing and re-applying to join the Register. The Register Manager should keep records 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.

## **E. ASSESSMENT OF COMPLIANCE WITH OCS EUROPE CERTIFICATION MANDATORY REQUIREMENTS IN SQAS AND PUBLICATION IN OCS EUROPE CERTIFICATION PUBLIC REGISTER**

In the case of logistics service providers and distributors that are SQAS assessed, the following system will be applied: The SQAS questionnaires include a set of questions corresponding to the OCS Europe Certification mandatory requirements.

If during a SQAS assessment, the OCS mandatory requirements are accomplished, an attestation/report showing this compliance will be issued and sent to the scheme owners for inclusion in the OCS Europe Public Register. SQAS is not a certification scheme and logistics service providers and distributors that are SQAS assessed will not be recognised as OCS Europe certified nor shown in the Public Register as OCS Europe certified.

They will be included in a separate section of the OCS Europe Public Register as "SQAS assessed companies, including fulfilment of hundred percent of the OCS Europe Certification mandatory requirements".

If the assessment shows that the facility is not complying with all the OCS Europe Certification mandatory requirements, the company will have to carry out intermediate(s) assessment(s) till this status is reached.

# **7. Validity, monitoring and renewal of the certificate**

## **A. CONTROL AUDITS**

The validity of this certificate will be 3 years with an annual control audit (documentary not physical) 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 control 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 facility will have a period of 30 days to provide a corrective action plan, for which it must send a corrective action plan to the certification body, which will proceed to study and evaluate them. The certification body shall review the implementation progress of the corrective action plans in the control audit.

## **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 Europe certificate are maintained.

### C. REMOVAL FROM REGISTRY

When a site/company fails a control or renewal audit and does not provide evidence of implementation of corrective action in due time, it will be removed from the public registry within two months of the notification of the failed audit. The facility should re-apply for the certification.

## 8. Changes in the production process

The facility must keep the certification body duly informed of those changes in the production processes that may affect compliance with the OCS Europe Certification 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 Europe 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 Europe Certificate, proceeding to adapt it to the new situation.

## 9. Annual Reporting Requirements

### A. TO SECTORAL TRADE ASSOCIATIONS

The annual reporting includes:

- the tracking of Key Performance Indicators defined in the scheme (refer OCS Europe Certification Requirements document);
- 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 Operation Clean Sweep Management Review (See chapter 4 of OCS Europe Certification requirements)

## 10. Definitions

LIST OF CONCEPTS	DEFINITION
Clean-up	Recovering pellets that have been spilled. Recovering pellets from historical pollution is covered through remediation.
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)
Good housekeeping	<p>The primary element of good housekeeping is to ensure spills are prevented as the first layer of protection in the pellet loss hierarchy. This may include promotion of exemplary behaviours on pellet handling and ensuring best practices to prevent spills. The facility shall have instructions ensuring that in case of a spill incident, loose pellets are collected in the shortest possible timeframe and in case of leaks, loose pellets are collected routinely in order to avoid pellets getting lost to the environment.</p> <p>Special attention should thereby be given to minimize loose pellets in areas where there is a high likelihood of loss to the environment, e.g.:</p> <ul style="list-style-type: none"> <li>■ nearby sewers and drains that do not have any pellet collection facilities or that are not connected to the manufacturing facility's Waste Water Treatment Plant,</li> <li>■ in areas with high traffic (e.g. near gates),</li> <li>■ in areas close to the fence line,</li> <li>■ nearby graveled or non-paved areas,</li> <li>■ in areas where loose pellets may be picked up by the wind or water (rain) and transported outside,</li> <li>■ ...</li> </ul> <p>Incidents should be timely reported to allow for rapid and effective clean-up and housekeeping of spilled pellets. Frequency of housekeeping rounds should be assessed based on the exposure to lose pellets as well as on the risk of pellet loss.</p> <p>Housekeeping standards should be checked frequently to ensure that standards are correctly maintained.</p>
Hierarchy of measures	System implementing procedures in the order of priority of spill prevention, containment, then clean-up, with a goal to prevent pellet loss to the environment.
Incident	An unusual or unexpected event which either resulted in or had the reasonable potential to result in an environmental impact. It can also be detection of spills from chronicles spill and losses that had escaped to attention before.
Loss	One-off or prolonged release of pellets OUTSIDE the operating boundary into the environment (e.g. water, soil...) and which are not recovered
Leak	Escape of pellets from a process or system occurring over a prolonged period of time which needs mitigating action to prevent. The term leak can be considered as a spill.
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	<p>Incident where an unplanned event does not lead to a loss of pellets to the environment, but has the potential to do so</p> <p><b>NOTE:</b> 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.</p>

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LIST OF CONCEPTS	DEFINITION
Non-conformity	Non-fulfillment of a Core Requirement or a Mandatory Specific Requirement
Core Requirements	Requirements of the OCS Europe Certification Scheme common to the entire plastics value chain
Specific Requirements	Requirements of the OCS Europe Certification Scheme specific to a particular 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 person/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>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))</p> <p><b>NOTE 1:</b> throughout this document plastic pellets, powders, flakes and dust, including recycled material, are referred to as "pellets"</p> <p>a) Plastic powder: fine particulate matter that serves as a feedstock in plastic product manufacturing operations.</p> <p>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 through the agglomeration of plastic dust or powder when plastics are processed.</p> <p>c) Plastic dust: fine particulate matter with irregular form and size, produced when plastics are manufactured, handled, conveyed, machined or processed.</p> <p><b>NOTE 2:</b> Pellets are produced in many colours. Plastic pellets are also known as "granules" or "nurdles" and are normally spherical or lenticular in shape.</p> <p><b>NOTE 3:</b> In some countries, plastic can also be termed "resin".</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
Preventive barrier/measure	Either a physical barrier or a procedure that prevents a spill to occur.
Mitigating barrier/measure	Either a physical barrier or a procedure that prevents a spill to result in a loss to the environment.
Spill	One-off or prolonged release of pellets that when effectively contained do not result in a loss to the environment.
Facility	Facility means one or more pellet production and/or handling units within the same physical boundary (see definition above) that are operated or controlled by the same natural or legal person/organization.

# ANNEX: OCS Europe Certification Scheme external reporting, transfer of knowledge, consistency and quality control

The scheme should meet different interdependent objectives:

- 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 must 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.

## A. INFORMATION GENERATING DURING THE 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 answers of this check list will be communicated in an IT system.

## B. THE ROLE OF TECHNICAL COMMITTEE

The technical committee is the forum through which transfer of knowledge may be ensured.

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).

3 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;
- 3 Recommendation for modification of the requirements, if necessary.

## C. 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 Europe certification carried out by an OCS licensee entity and by the OCS Europe Certification 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. SQAS auditors will be trained by Cefic.

## D. 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 a 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). Observers to SQAS audits will be appointed by the SQAS Technical & Accreditation Committee.

## E. 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 associations.

A field is foreseen for main conclusion/remarks of the audit.

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

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 facilities 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);
- 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 scheme owners and relevant Operation Clean Sweep licensees (trade associations) for their own membership.

It will be required that the auditor verifies:

- 1 The correct application of sampling protocols for spills by the audited facility;
- 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.

Those 2 fields will be particularly scrutinized by the Trade Associations in a regular review.

## F. CONTROL OF AUDITORS

It is the responsibility of certification bodies to control their auditors. It is Cefic responsibility to control SQAS auditors, following the rules defined in the SQAS Accreditation Manual [https://www.sqas.org/document-download.php?lang=en&doc\\_id=42799000](https://www.sqas.org/document-download.php?lang=en&doc_id=42799000)

## G. CONTROL OF CERTIFICATION BODIES

It is the intention to have the OCS Europe Certification 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.