

OCS EUROPE  
CERTIFICATION SCHEME

# Ground transport and logistics companies

VERSION 2.0  
JULY 2025

# **OCS EUROPE CERTIFICATION SCHEME**

CREATED BY

## **PLASTICS EUROPE & EUROPEAN PLASTICS CONVERTERS**



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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.



As explained in Chapter 6, article C of OCS Europe Certification Scheme Rules & Principles, the questions are identified and classified as major or minor non-conformities through a "M" or "m", respectively.

## 1. MANAGEMENT SYSTEM AND RESPONSABILITY

### CORE TWD

<p>1a) Has the senior management signed up to "Operation Clean Sweep" (OCS) programme?</p>	<p>M</p> <p>OCS is an international programme designed to prevent the spill of plastics pellets (granulates, flakes) and powders and their loss into the environment during handling by the various entities in the plastics value chain.</p> <p><a href="http://www.opcleansweep.eu/">http://www.opcleansweep.eu/</a> The assessor will check that the company is listed in this website.</p> <p>To sign up for OCS the company should sign the OCS pledge:</p> <ol style="list-style-type: none"> <li>1. Improve worksite set-up to prevent and address spills</li> <li>2. Create and publish internal procedures to achieve zero industrial plastic material loss</li> <li>3. Provide employee training and accountability for spill prevention, containment, clean-up, and disposal</li> <li>4. Audit performance regularly</li> <li>5. Comply with all applicable state and local regulations governing industrial plastics containment</li> <li>6. Encourage partners (contractors, transporters, distributors, etc.) to pursue the same goals"</li> </ol> <p>By signing the pledge, the company will have its name listed on the OCS website.</p> <p>See the definitions of "loss" and "spill" in the Annex</p> <p>The assessor will look for written evidence that the OCS programme is a priority.</p>
<p>1b) Has the company asked the applicable subcontractors to sign the OCS programme?</p>	<p>M</p> <p>The assessor will score positively if the transport, site cleaning and waste collection companies involved in pellets handling activities are required to sign the OCS programme</p>
<p>1c) Does the company inform and promote the OCS programme with its business partners to encourage them to pursue the same objectives on pellet loss prevention?</p>	<p>M</p> <p>The auditor will look for documentary evidence of this communication</p>
<p>2) Is there a process for informing the regulatory bodies (where regulations require it) if a pellet loss happens?</p>	<p>M</p> <p>The auditor will look for documentary evidence of this communication</p>

## 2. RISK MANAGEMENT

CORE TWD

<p>1) Is there a process to identify and document potential spillages/losses of plastic pellets?</p>	<p><b>M</b></p> <p>The risk analysis must be periodically reviewed and kept updated. It shall contain:</p> <p>a) Locations /processes/activities/ where a pellet spill/loss can occur</p> <p>Examples:</p> <ul style="list-style-type: none"> <li>■ A transport company could identify pellets: <ul style="list-style-type: none"> <li>■ in or on the transport unit after the loading/unloading operation that have a risk of falling off after the truck leaves the site</li> <li>■ falling off the trailers in its cross-docking facility during loading/unloading operations</li> </ul> </li> <li>■ A tank cleaning station could identify a place where there is a risk of pellets spill while opening the tank lids.</li> <li>■ A Warehouse could identify that there is a risk of pellet spill during debagging operation.</li> </ul> <p>b) The facility will have a map identifying the points where pellet spills can happen. The assessor will use the map when visiting the site.</p> <p>c) A root-cause analysis of the process to assess where and during which operation a spill/loss of pellets, powder or flakes may occur.</p> <p>d) The assessment of the likelihood of a spill/loss and its magnitude to assign the appropriate priority and "risk ranking".</p> <p>Qualitative or quantitative risk assessment methods can be used.</p>
<p>2) Is there a process to identify and document potential generation of plastic dust?</p>	<p><b>M</b></p> <p>Dust is difficult to clean up and the focus should be put on avoiding its generation.</p>
<p>3) If company has site activities: Are the physical boundaries of the OCS programme, including areas surrounding the site, defined and documented?</p>	<p><b>M</b></p> <p>Any surrounding area that might be impacted by losses of pellets from the site-activities shall be considered part of the site-OCS program (e.g. loss of pellets that fell off trucks on the roads and roundabouts outside the site after loading or discharge). Communal surroundings that are included in a communal OCS program (that is to say, an OCS program not managed by the assessed company) such as port- or industrial zone programs are exempted.</p>
<p>4) Is there a risk minimization plan to prevent and address spills/losses of plastic pellets and their recurrence?</p>	<p><b>M</b></p> <p>The plan should include responsibilities, actions, and due time. It shall be implemented and kept updated. It will establish preventive, containment and cleaning/reaction measures, protocols and or procedures.</p> <p>The following hierarchy of measures (layers of protection) shall be taken into account when devising procedures:</p> <ol style="list-style-type: none"> <li>1) Avoid unnecessary handling</li> <li>2) Best practices for handling/tools/procedures</li> <li>3) Containment</li> <li>4) Cleanup/mitigation</li> </ol> <p>The protocols and or procedures will include the equipment needed to address spills/losses. Records shall be kept.</p> <p>The plan should cover spills/losses generated by plastics pellets and plastic dust and/or plastic powder.</p> <p>See OCS Manual <a href="http://www.opcleansweep.eu/wp-content/uploads/2013/04/OCS_Manual_EU_ENG_2015.pdf">http://www.opcleansweep.eu/wp-content/uploads/2013/04/OCS_Manual_EU_ENG_2015.pdf</a></p>

### 3. HUMAN RESOURCES

CORE TWD

<p>1) Is there a training programme in place for all personnel that results in an individual training plan and are records available that the training plan has been implemented? Is the training plan reviewed annually?</p>	<p>A training programme is the overall procedure on training. A training plan is the output list of training to be followed. This question is about the programme and plan, but the implementation has to be in compliance with local legislation. For new employees, the programme shall include an induction training.</p> <p>In case that the company handles/transportes plastics pellets, the organization shall determine the training needs associated to the OCS programme. A training programme will cover the needs based on the employees' specific roles and responsibilities and will include a training schedule. The organization shall provide a training programme for all relevant personnel working on facility, including non-pellets handling roles, that will result in individual training plans.</p> <p>The auditor will ask for an organigram, will select some employees and will ask for the description of their roles and responsibilities and verify the employees' training needs associated to the OCS programme.</p> <p>Look for up-to-date training records and individual proof of the implementation of the training programme. If the training programme or training plan could not be followed, clear evaluations should be available to explain the discrepancies in combination with corrective actions. EU Directive: 89/391/EEC Art. 10.</p> <p>Some tasks/activities may require a specific knowledge, experience or education. Discuss whether a conscious effort has been made to assign qualified people for specific (technical) aspects of the business, where required. The risk analysis is a basic document to identify such tasks.</p>
<p>2) Are the following subjects included in the training plan?</p> <ul style="list-style-type: none"> <li>■ awareness and accountability for spill/loss prevention, containment, clean-up, and disposal of plastics pellets,</li> <li>■ written procedures to prevent, contain, clean-up and dispose spills/losses.</li> </ul>	<p>Anybody involved in transportation and or handling of plastics pellets should understand that plastic spills are as bad as chemical spills. Consequences of plastics spills are less immediate, but they last much longer in the environment:</p> <ul style="list-style-type: none"> <li>■ Training of employees shall include theory and practical hands on exercises</li> <li>■ Subcontractors and external workers on site should be included in the awareness programme, as a minimum requirement. External organizations for which the subcontractors are working are responsible for ensuring the competence of their personnel. If drivers and/or external workers on site are present during the visit, the auditor will interview them to verify the implementation of the training plan.</li> </ul>
<p>3) Are employees informed about the evolution of the company's OCS programme?</p>	<p>Records of the information provided to employees will be kept.</p>
<p>4) Are employees encouraged to provide feedback on the company's OCS programme to the line management?</p>	<p>Records of the communication will be kept.</p>

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### 3. HUMAN RESOURCES

CORE TWD

- 5) Is there a written plan for dealing with on-site and off-site emergencies and potential crises?

**Note:** Text underlined is only applicable when an off-site ER plan is required, on top of the ER plan on-site

M

The written emergency plan should cover all applicable scenarios, all items indicated in 4.2 and shall be regularly updated. In case that the company handles or transport plastic pellets the scenarios to be considered should include an accident involving a loss of pellets into the environment. This should be treated as an emergency.

Check if all the described arrangements are in place. Verify if individuals understand their specific responsibilities in case of an emergency. The emergency response plan should also contain any customer specific contacts on a 24/7 basis. An emergency may turn into a crisis. Check that this crisis plan is part of the emergency plan.

This question is also applicable for service providers that only subcontracts other companies. The service provider can forward the requirements to their subcontractors, but it is their responsibility to test or check whether their subcontractors are able to deal with emergencies as defined.

The assessor should look for a written plan detailing the response by the company (or a contracted company). This ER Plan must be able to cater for the recovery of damaged equipment, the recovery of product and the containment and mitigation of any spill. This service may be undertaken by an external 3rd party emergency responder who has been formally appointed.

- 6) Is there a documented procedure(s) in place including:

- Instructions for managing the clean-up, the use of the clean-up equipment and disposal of the pellets after a spill/loss to prevent impact to the environment?
- A clear definition for an acceptable cleaned up scenario after the incident?

M

The facility should keep a housekeeping level according to the definition in the Annex.

In case of an incident, pellets should be immediately collected to avoid that wind/rain increases the environmental impact.

If the incident happens on the road, traffic movement also increases the risk of environmental impact. Depending on local legislation about intervention of public emergency brigades, the transport company will define the driver's responsibilities during the emergency. The shipper should be contacted for assistance/advice.

4. PERFORMANCE ANALYSIS AND MANAGEMENT REVIEW		
CORE TWD	1) Is there a documented system in place for recording non-conformances regarding:	
	1a) accidents & incidents?	
	1b) Is a detailed report on non-compliances provided to the responsible management, containing immediate cause, root cause and recommendations for corrective actions to prevent recurrence?	
	1c) Is there a procedure in place to inform the customer promptly of all non-conformances involving his shipments/products?	
	2) Are performance objectives established?	
	3) Does the company have internal KPIs on:	
	3a) Number and volume of incidents resulting in any unrecovered release (loss) of plastic pellets, flakes, powders, or granules, to ground or water outside the facility and estimated to be greater than 0,5 litres or 0,5 kilograms per incident.	
	3b) percentage of employees and contractors dealing with pellets that received operating training	
	3c) % of programmed/planned OCS inspection/self-assessment that have been executed	The relevance of the pellet handling supplier will be defined by the assessed company.
	3d) % of relevant pellet handling business partners with whom the company promoted pellet loss awareness and the OCS programme?	
	3e) % of contract(s) where there is an OCS clause with relevant pellet handling suppliers?	The auditor will verify that the company has made a submission to the trade association, when requested by it.

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## 4. PERFORMANCE ANALYSIS AND MANAGEMENT REVIEW

CORE TWD	4) Is there a documented programme:	M	<p>For an effective control of the Management Systems it is necessary to audit each stage of the management system. Such audit(s) should be thorough and comprehensive. The audits must cover the information technology system, as well. The assessor should look for a written audit plan indicating a detailed system. A document detailing what will be audited, the frequency and who will do it must be available.</p> <p>The audit programme will take into consideration:</p> <ul style="list-style-type: none"> <li>■ The competence and training of the internal auditors and their independence</li> <li>■ The actions for non-conformities identified in the audits</li> <li>■ The audit reporting</li> <li>■ The management of any change in the operations of the facility</li> <li>■ The actions from incidents</li> <li>■ The effectiveness of preventive measures</li> </ul> <p>Look specifically if the areas (chapters) as referred to in SQAS are sufficiently covered.</p> <p>The actual situation of the company should be compared with the applicable legislation and the permits.</p>
	4a) for internal auditing covering compliance with applicable legislation and permits?	M	
	4b) For internal annual auditing of OCS requirements covering:	M	
	<ul style="list-style-type: none"> <li>■ the compliance of the routine inspection plan inside and outside its physical boundaries, and its effectiveness</li> <li>■ the housekeeping status</li> <li>■ the effectiveness and suitability of procedures, equipment and instructions to avoid spills and a potential loss into the environment</li> <li>■ the estimation of the amount of pellet lost per year as a way to track progress towards the objective of zero pellet loss</li> </ul>		
	5) Is a formal management review meeting held at least once a year by the senior manager to review the management system that includes, as minimum, the following inputs:	M	
	5a) the actions from previous management meetings	M	
	5b) the results of internal and external audits	M	
	5c) the monitoring of KPIs trends	M	
	5d) the degree of implementation and effectiveness of the training plan	M	
	5e) the status of compliance with local, national and EU regulations	M	The recommendations shall include measures to prevent pellet loss to the environment, if applicable.
	5f) recommendation(s) for continuous improvements	M	



## 5. STORAGE AND HANDLING PRACTICES

### WAREHOUSE

<p>1) Is the product waste (hazardous and non-hazardous ) segregated for disposal/recycling in a safe and practical way and are waste bins available and emptied regularly?</p>	M	<p>Look for appropriate waste transfer notes.</p> <p>Check that the waste containers are correctly identified, labelled and contain waste properly segregated.</p>
<p>2) Are unauthorised discharges into controlled waters prevented?</p>	M	<p>There should be a map showing storm water drains and any other effluent pipes, such as the foul sewer (usually flows to municipal sewage plant). It is important that the storm water drains have adequate and maintained controls to prevent unauthorised discharges into rivers and public drains. 'Controlled waters' are usually defined by legislation and are rivers, streams, lakes and coastal waters.</p>
<p>3) Is there a procedure which describes the way to keep the water treatment units in good condition?</p>	M	<p>Procedures and training should be present.</p>

## 6. SITE OPERATING PROCEDURES AND CUSTOMER INTERFACE

### WAREHOUSE

1)	Is there a documented programme for preventive inspection and maintenance covering facilities and equipment that handle plastic pellets or prevent spills?	M	
2)	Regarding pellet loss:	M	This subsection contains general requirements to avoid plastics pellets loss.
2a)	does the company have appropriate facilities and equipment to comply with the risk minimization plan?	M	It is a good practice to divert rainwater from roofs (not silo roofs) on separate sewer lines. Silo roofs can be overfilled by mistake. This will reduce the amount of water to be filtered. This is a recommendation; it is not a requirement to be scored.
2b)	are there instructions in place to effectively prevent and manage any potential spill of pellets to ensure that the potential loss of primary containment is minimized?	M	The instructions should be for employees, drivers and subcontractors working on site.
2c)	are there housekeeping tours in place including routine inspections of the facility grounds and the site vicinity with a defined frequency?	M	The assessor will inspect the site and site vicinity identified by the company where loss can happen.
2d)	Are the inspection pits and sewer collectors with pellet separating filters/ sieves included in the routine inspections?	M	The assessor will check the inspection pits if this can be done safely. This is a typical check by environmental authorities.
2e)	Are the housekeeping tours documented?	M	The reports will identify the areas not complying with the standard.
2f)	When spills are found and recorded by the company inspector: are immediate actions taken to clean them up?	M	
2g)	When spills are found and recorded by the company inspector: are checks made after the routine inspections to verify the effectiveness of cleaning up?	M	
2h)	Is there cleaning up equipment available such as: <ul style="list-style-type: none"> <li>■ Brooms, dustpans, rakes, etc.,</li> <li>■ Heavy-duty shop vacuums for inside use,</li> <li>■ Portable shop vacuums for outside use,</li> <li>■ Catch trays or traps,</li> <li>■ Wide-mouth sample collection jars or poly-bags,</li> <li>■ Tape for repairing bag or box damage,</li> <li>■ Scrap pellet containers,</li> <li>■ Forklift clean-up kit.</li> </ul>	M	The assessor will check that the equipment complies with the requirements.
2i)	do the employees have ready access to clean-up equipment?	M	

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6. SITE OPERATING PROCEDURES AND CUSTOMER INTERFACE		
WAREHOUSE	2j) Are silos and tanks (bodies and pipes) cleaned with filtering tools to retain dust?	M If not, these will go to the sewer collector and will certainly pass the pellets sieve. Examples of filtering tools are filtering socks.
	2k) Is waste collection separated and contained in appropriate containers before departure?	M Floor sweep and off spec product should be segregated. Waste should be separated according to legal requirements - Mix of plastic waste
	2l) Are empty pallets free from pellets before departure?	M
	2m) Are there screeners in sewer drains to catch pellets to avoid they enter the water course?	M
	2n) Is there a water filtering system to avoid that pellets reach the water course?	M This is a second containment to capture pellets.
	2o) Are the screeners in sewer drains cleaned up with a defined frequency?	M This is to assure that no pellets are dragged by the rain. Records of the cleaning up should be available.
	2p) Does the water filtering system indicated in 2n avoid that pellets reach the water course in case of exceptional heavy rain?	M "Exceptional heavy rain" is a rain expected every ten years.

## 7. SPECIFIC TYPES OF WAREHOUSING ACTIVITIES

WAREHOUSE	1) Where loading/unloading of plastics pellets takes place, is there a procedure that requires:	M	The assessor should check the requirements in the working instructions/procedures.  On top of that, if these operations takes place during the assessment the assessor will check that the requirements of the sub questions are complied with.
	1a) to place a catch pan or trap under the connection, if the line must be opened due to blockage of product?	M	Connections between hoses and pipes may be required during transfer/unloading/other operations. The purpose of the catch pan or similar, is to retain any pellets released.
	1b) bulk transport units, that need to reposition during the loading process, are prevented from unexpected movement?	M	Transport units that are loaded by gravity (e.g. under a silo) may need to reposition to the next fill compartment or filling hatch, when being filled. If, due to miscommunication between the driver and the loader, the truck is moved while the product flow is not interrupted, a large (granule) spill on top of the truck and on the floor of the loading place will result. Measures have to be taken that avoid misunderstandings between driver and loader and prevent movement of the transport unit.
	1c) devices installed to avoid overflowing?	M	Chronometer or volumetric dosing valves can be used or any other device to optimize loading and avoid spills.
	1d) devices installed to avoid dust emission and pellets spill from the filling pipe or from the bulk tank/truck during loading operations?	M	Dust emission during loading can be avoided or limited by putting extra connection tools to close the loading system and/or by dust extraction.  This question could be not applicable. Refer to the risk assessment question to see if this risk exists.
	1e) dust emission from the silo prevented during bulk unloading into the silo?	M	Dust emission during silo filling/product transfer should be avoided or limited by putting dust filters or extraction on silo vent systems.  The dust extraction is mostly needed when handling powder or dusty flakes. For granulates this is not needed.
	1f) before installing liner bags, empty containers are carefully inspected to identify damaged interior walls or defective floors that could tear liner bags?	M	This question is not applicable if this operation is not carried out within the boundary of the facility/warehouse being assessed.
	1g) to remove any spilled pellets from the top of the truck/rail tank car/trailer/container before leaving the containment area?	M	Residual pellets will fall to the ground as transport units are moved outside the plant.
	1h) loading/unloading areas to be a smooth hard surface	M	If there are cracks or grooves in the surface of these areas (loading/unloading), the pellets that could be trapped inside should be easy to remove using normal cleaning operations (vacuum, sweeper, or blower)
	2) Bagging and/or debagging and /or packing Operations of Solid Products (Bags, Big Bags, and/or Octabins)	M	Bagging includes operations where solid products in bulk are packed in bags, big bags or Octabins. <b>Debagging</b> implies the opposite operation.
	2a) before loading bags of pellets, are empty trailers/containers carefully inspected to identify damaged interior walls or defective floors that could tear bags and damage packaging?	M	The assessor will check that this inspection is part of the procedure and will ask the operators in charge about the decisions taken, in the event that the trailer/container is found to be defective.

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7. SPECIFIC TYPES OF WAREHOUSING ACTIVITIES		
WAREHOUSE	<p>3) Where bagging or packing pellets or packing polymers takes place, is there a procedure that requires:</p>	<p>M</p> <p>The assessor should check these requirements in the working instructions/procedures.</p> <p>On top of that, if these operations take place during the assessment, the assessor will check that the requirements of the sub questions are complied with.</p>
	<p>3a) to inspect pallets for protruding nails or broken boards?</p>	<p>M</p>
	<p>3b) to deal with leaking bags/octabins?</p>	<p>Leaking bags/octabins can be:</p> <ul style="list-style-type: none"> <li>■ taped and reprocessed or</li> <li>■ taped and sent to customers if they agree to receive them.</li> </ul>
	<p>3c) to regularly clean up pellets that are spilled during the filling process.</p>	<p>M</p>
	<p>4) Where debugging of plastics pellets takes place, is there a procedure that requires clean-up of equipment and floor?</p>	<p>M</p> <p>This is especially critical when debugging is made manually. Plastics spills should be managed in a proper way. Empty pallets should be cleaned to avoid environmental impact</p>



## 8. SUBCONTRACTED SERVICES

### WAREHOUSE

- 1) Is there a documented process defining and choosing the logistics solution and selecting the service partners for each business assigned to the company including OCS elements?

M

Look for a documented process including a risk assessment covering OCS elements for defining and choosing the logistics solution for the assigned orders. Verify a sample of current or completed assignments, the process for selecting parties and persons involved, communication lines and interfaces, schedules and routes, alternative solutions with considerations on OCS requirements.

- 2) Are contractors, working on site other than logistics service contractors, provided with relevant health, safety, security, environmental (including OCS requirements, if applicable) and CSR information to ensure that on site services are performed accordingly?

M

The assessed company shall take appropriate measures so that employers of workers from any contractor engaged in work in the company receive, in accordance with national laws and/or practices, adequate information concerning the risks and prevention measures as required by the company or to specific tasks.

The contractor employer has to inform his employees.

EU Directive: 89/391/EEG Art. 10 § 2

The assessor will check during the inspection round the presence of contractors and their compliance with the requirements of this question.

## 9. MANAGEMENT SYSTEM AND RESPONSABILITY

### WAREHOUSE

- 1) Is the assessed company packing plastic pellets from bulk to silo or repacking plastic pellets from large packaging (bigbags, octabins, etc) into smaller packed material and is the packing used of good quality according to IMO Circular MEPC/909, item 1.1?

M

IMO Circular MEPC/909 item 1.1 requires that plastic pellets should be packed in good quality packaging which should be strong enough to withstand the shocks and loadings normally encountered during transport. Packaging should be constructed and closed to prevent any loss of contents which may be caused under normal conditions of transport, by vibration or acceleration forces.

The assessors will check whether plastic pellets are to be transported by sea. If so, they will request the necessary documents (certificates, lab tests, etc.) to confirm that the packaging meets the quality requirements mentioned in the previous paragraph. The assessors will also verify in the warehouse/distributor site that the packaging used for plastic pellets is indeed the one approved for this purpose.

- 2) Is the assessed company packing plastic pellets from bulk to silo or repacking plastic pellets from large packaging (bigbags, octabins, etc) into smaller packed material and is the transport information created by the assessed company identifying the freight containers containing plastic pellets according to IMO Circular MEPC/909, item 1.2?

M

IMO Circular MEPC/909 requires in item 1.2 that transport information should clearly identify, as an addition in the cargo information required by SOLAS regulation VI/2, those freight containers containing plastic pellets. In addition, the shipper should supplement the cargo information with a special stowage request requiring stowage as outlined in paragraph 1.3.

The assessors will take a sample of the transport documents involved in transport pellets by sea and will verify the requirements mentioned in the paragraph before.

## 10. MANAGEMENT OF SUBCONTRACTORS

- 1) Is there a documented process defining and choosing the logistics solution and selecting the service partners, including a risk assessment covering OCS requirements?

M

The organization shall identify the selection criteria relevant to responsible pellets handling. The selection criteria could include SQAS assessment, OCS certification, ISO 14001 certification, or compliance with other equivalent standards.

- 2) Are OCS requirements covered?

M

## 11. CREATE AND PUBLISH INTERNAL PROCEDURES TO ACHIEVE ZERO PELLET LOSS GOALS

- 1) Subcontractor Performance Monitoring – Does the company assess subcontractor performance with respect to compliance with OCS requirements?

M

## 12. BEHAVIOUR BASED SAFETY (BBS OR EQUIVALENT PROGRAMME)

### TRANSPORT SERVICE

1)	Is there a written procedure in place which requires the driver to verify if, during and after loading and unloading, lost pellets are properly removed from the outside of the transport equipment before leaving the loading/unloading site?	M	<p>The procedure could be part of the driver's manual. The loading/unloading operator can use dust suction systems or blowers (open or closed) to remove lost pellets. This also applies to sweeping out trailers of packed cargo after unloading (pellets after damages or released through filling openings of the packaging). Refer to the Cefic/ECTA Guidelines "Safety and Quality Best Practice Guidelines for Unloading of Polymers in Bulk", section 5.</p> <p><a href="https://cefic.org/library-item/best-practice-guidelines-safety-quality-guidelines-for-unloading-polymers-in-bulk">https://cefic.org/library-item/best-practice-guidelines-safety-quality-guidelines-for-unloading-polymers-in-bulk</a></p>
2)	Is equipment to contain and clean up pellets available on the truck?	M	
3)	Does the driver have instructions that require pellets to be put in closed containers or bags for proper disposal?	M	The question is only applicable while in transit (not at loading/unloading sites, not at cleaning station).
4)	In case of transportation of pellets in bulk tanks, does the driver have instructions that the bottom manhole/cone of the silo tank should not be opened before entering the cleaning bay?	M	The auditor will ask for documentary evidence and will confirm with employees during the site visit.
5)	Does the driver have instructions which prohibits the replacement of the container liner in any public area?	M	<p>A container liner (bag-in-box) is a plastic bag used to contain pellets.</p> <p>A container liner could have rest of pellets, so, there is a risk of environmental impact.</p>
6)	Are there written instructions and precautions that the driver must take into account when unloading polymers in bulk?)	M	Refer to the Cefic/ECTA/Plastics Europe Guidelines "Safety and Quality Best Practice Guidelines for Unloading of Polymers in Bulk", section 3.

### 13. CONTROL OF OPERATION

TRANSPORT  
SERVICE

<p>1) Are key performance indicators identified and measured, such as:</p>	<p>M</p> <p>The assessed company should ensure that the annual data collection of the KPI's and reporting is incorporated into their management system. (The ECTA RC programme and KPI reporting could be the reference point for companies to use). The KPIs should measure the frequency of accidents/incidents by worked hours. For KPI analysis purposes assume that each employee works 2000 hours per working year.</p>
<p>1a) accidents and incidents whilst in transit?</p>	<p>M</p> <p>Check the incident reports and the individual driver records.</p>
<p>1b) accidents and incidents at loading points?</p>	<p>M</p> <p>Check the incident reports and the individual driver records.</p>
<p>1c) accidents and incidents at unloading points?</p>	<p>M</p> <p>Check the incident reports and the individual driver records.</p>

### 14. TRANSPORT INFORMATION

TRANSPORT  
SERVICE

<p>1) Is the transport information created by the assessed company identifying the freight containers containing plastic pellets according to IMO Circular MEPC/909, item 1.2?</p>	<p>M</p> <p>IMO Circular MEPC/909 requires in item 1.2 that transport information should clearly identify, as an addition in the cargo information required by SOLAS regulation VI/2, those freight containers containing plastic pellets. In addition, the shipper should supplement the cargo information with a special stowage request requiring stowage as outlined in paragraph 1.3.  The assessors will take a sample of the transport documents involved in transport pellets by sea and will verify the requirements mentioned in the paragraph before.</p>
<p>2) Is the assessed company checking that the transport information identifies the freight containers containing plastic pellets according to IMO Circular MEPC/909, item 1.2?</p>	<p>M</p> <p>IMO Circular MEPC/909 requires in item 1.2 that transport information should clearly identify, as an addition in the cargo information required by SOLAS regulation VI/2, those freight containers containing plastic pellets. In addition, the shipper should supplement the cargo information with a special stowage request requiring stowage as outlined in paragraph 1.3.  The assessors will take a sample of the transport documents involved in transport pellets by sea and will verify the requirements mentioned in the paragraph before.</p>
<p>3) Are the Freight containers containing plastic pellets properly stowed and secured, under deck wherever reasonably practicable or inboard in sheltered areas of exposed decks, so as to minimize the hazards to the marine environment without impairing the safety of the ship and persons on board?</p>	<p>M</p>

## 15. TANK CLEANING

### TANK CLEANING

1) Are water discharges monitored according to the permit requirements?	M	Check the monitoring system.
2) In case of transportation of pellets in bulk tanks, is the bottom manhole/cone of the silo tank not opened before entering the cleaning bay?	M	This is to avoid that pellets are spilled on the floor out of the sieve or water treatment system.
3) Does the effluent treatment of the tank cleaning station avoid plastic pellets coming from the cleaning station facilities and tank silos from getting into waterways?	M	<p>A mechanical system should be in place (i.e. filter, recirculation of the water) to separate the pellets from the water. This could be part of the standard gravity separator of the station.</p> <p>A sieve like a sock filter can also be used at the bottom outlet of the tank to filter the rinse water before entering the cleaning bay drain.</p>
4) Are the labels removed from tanks properly treated?	M	Labels are removed from tanks using water at high pressure. They could be broken into small pieces that could have the same negative environmental impact as plastic pellets.
5) Does the cleaning area have a system guiding the waste waters to the treatment plant?	M	The run-off of the cleaning area has to be controlled by using containment and connection to the water treatment plant to prevent direct flow into open waters or city sewer systems.
6) Is all possibly contaminated water collected and drained to the public sewer system via the local treatment unit ?	M	<p>The run-off of the cleaning area has to be controlled by using containment and connection to the water treatment plant, to prevent direct flow into open waters, the soil or city sewer systems.</p> <p>The drainage of the storage area for packed goods and residues and all possible polluted rainwater should be handled in the same way as the cleaning waste water before being discharged in the public sewer system or surface water.</p>
7) Is all waste including pellets disposed of according to locally applicable legislation?	M	Check details of the waste disposal arrangements which are in place and if these are in compliance with the relevant regulations applicable for the country of operation. Examples of waste may be waste oil, paper, scrap metal, chemicals, lamps, aerosols, contaminated clothing, used PPE's, etc.



# 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 requirements or a mandatory specific requirements
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 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 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.