

OCS EUROPE
CERTIFICATION SCHEME

Rules & Principles

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Version 2.0

Created by Plastics Europe and European Plastics Converters

This document is subject to future review and potential update(s). The next review will take place in 2026.

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

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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 OCS promotion materials such as posters, videos and flyers are also available on the [OCS website*](#).

In 2020, EuPC, the association of European Plastics Converters, and Plastics Europe, the association representing plastics manufacturers in Europe, committed to jointly develop by 2022 an OCS certification scheme aimed at controlling and documenting compliance with requirements targeting minimization of pellet loss across the entire plastic supply chain. It will also support the effective, harmonised and quantifiable implementation of the OCS programme. The certification scheme has been developed together in consultation with Industry experts, trade associations, NGOs, policy makers and certification bodies. In the 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 principles of the OCS Europe Certification Scheme. The OCS Requirements document consists of the set of requirements to comply with in order to be OCS 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 OCS requirements, will be reviewed after 1 year of implementation, and possibly amended where needed. OCS ensures further that by implementing the programme, companies also comply with relevant EU and National regulation such as the French decree N° 2021-461 and with future European regulation on preventing plastic pellet losses to reduce microplastic pollution.

Updated versions of the documents will be available on the website of Operation Clean Sweep (www.opcleansweep.eu) and the dedicated website for the OCS Certification Scheme (www.ocscertification.eu).

1. Scope

The OCS Europe certification scheme aims to support facilities throughout the entire plastics supply chain within the European territory (EU27+ other countries geographically located in Europe) to comply with requirements on the prevention of plastic pellets, powders and flakes loss to the environment.

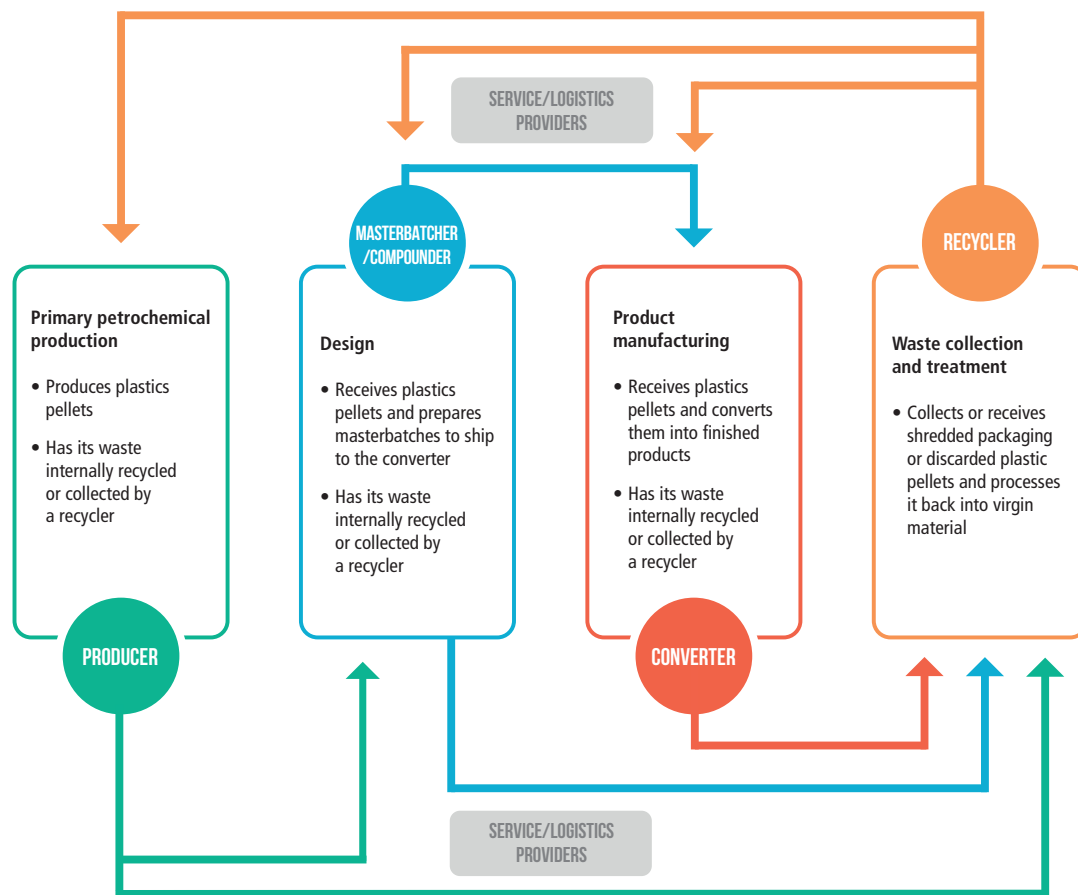


Figure 1. Plastics value chain diagram

2. Scheme development and operation

The OCS Europe certification scheme is owned by EuPC and Plastics Europe.

The OCS certification is based on audits, performed by independent and competent certification bodies. The OCS certification is based on a 3-year audit cycle of which the first audit in each cycle encompasses an on-site audit and subsequent audits in the cycle are documentary unless non-conformities require otherwise. The application for a recertification audit should be initiated and concluded by the facility within the validity period of its certificate.

Requirements are reviewed in a process involving the Technical Committee, Management Board and Supervisory Board. In case changes to requirements are deemed necessary, the OCS Technical Committee is responsible for updating the scheme according to legal requirements and industry best practices, and submitting the changes for approval by the Management Board and the Supervisory Board (see Annex I).

During the first audit cycle, a review will be carried out one year after the start of operation of the scheme.

3. OCS Certification requirements

To be OCS certified, companies shall demonstrate their compliance with the OCS Requirements. These requirements cover, but are not limited to, management practices, communication requirements, procedures and key performance indicators documenting pellet loss prevention. These will be verified per facility by an independent certification body. (Audit check list to be referred/linked here)

All OCS requirements are translated into auditable questions (OCS auditor 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 shall always be made to the English version.

The following scheme explains the structure of the OCS Europe requirements.

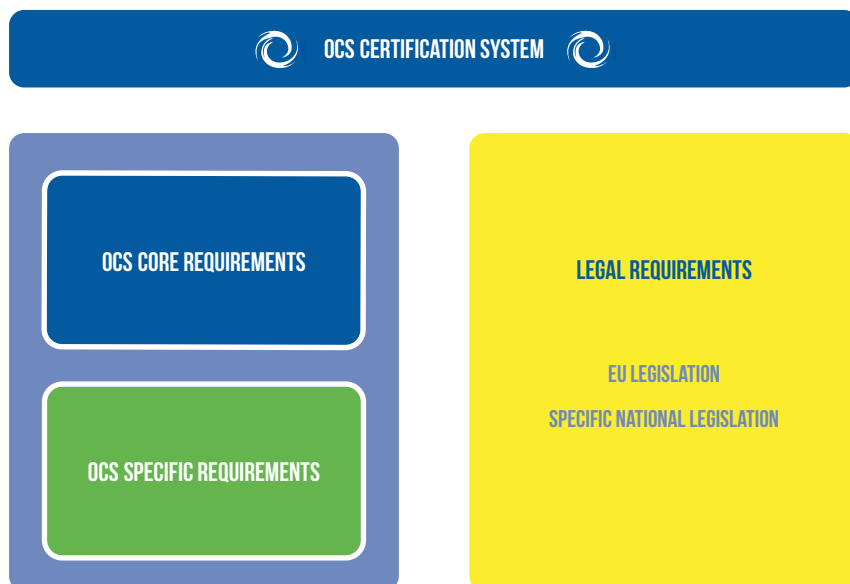


Figure 2. Structure of the OCS Europe requirements

The OCS Requirements are composed of the OCS Core Requirements, the OCS Specific Requirements and the legal requirements. The legal requirements are applicable to facilities subject to the EU or specific National legislation mentioned in the introduction.

A. OCS CORE REQUIREMENTS

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

B. OCS SPECIFIC REQUIREMENTS

Each part of the value chain also has its own specific OCS Europe Certification requirements with measures, KPIs and potential targets. Currently the following specific requirements are defined: OCS Europe Production covering plastics manufacturers and integrated compounders; OCS Europe Master-batching compounding and converting; OCS Europe Ground Transport and Logistics companies, including distributors, warehouses, transport services, and tank cleaning stations.

4. Certification bodies

The certificate in accordance with the OCS Europe requirements shall 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 ISO/IEC 17021 for audit and certification of management systems in the plastics sectors (raw material producer/supplier, logistics/transport/cleaning, converters, recyclers...). Appropriate certification bodies will be approved through the scheme governance structure.

In addition to the personnel requirements of ISO17021, the OCS requirements for auditors are as following:

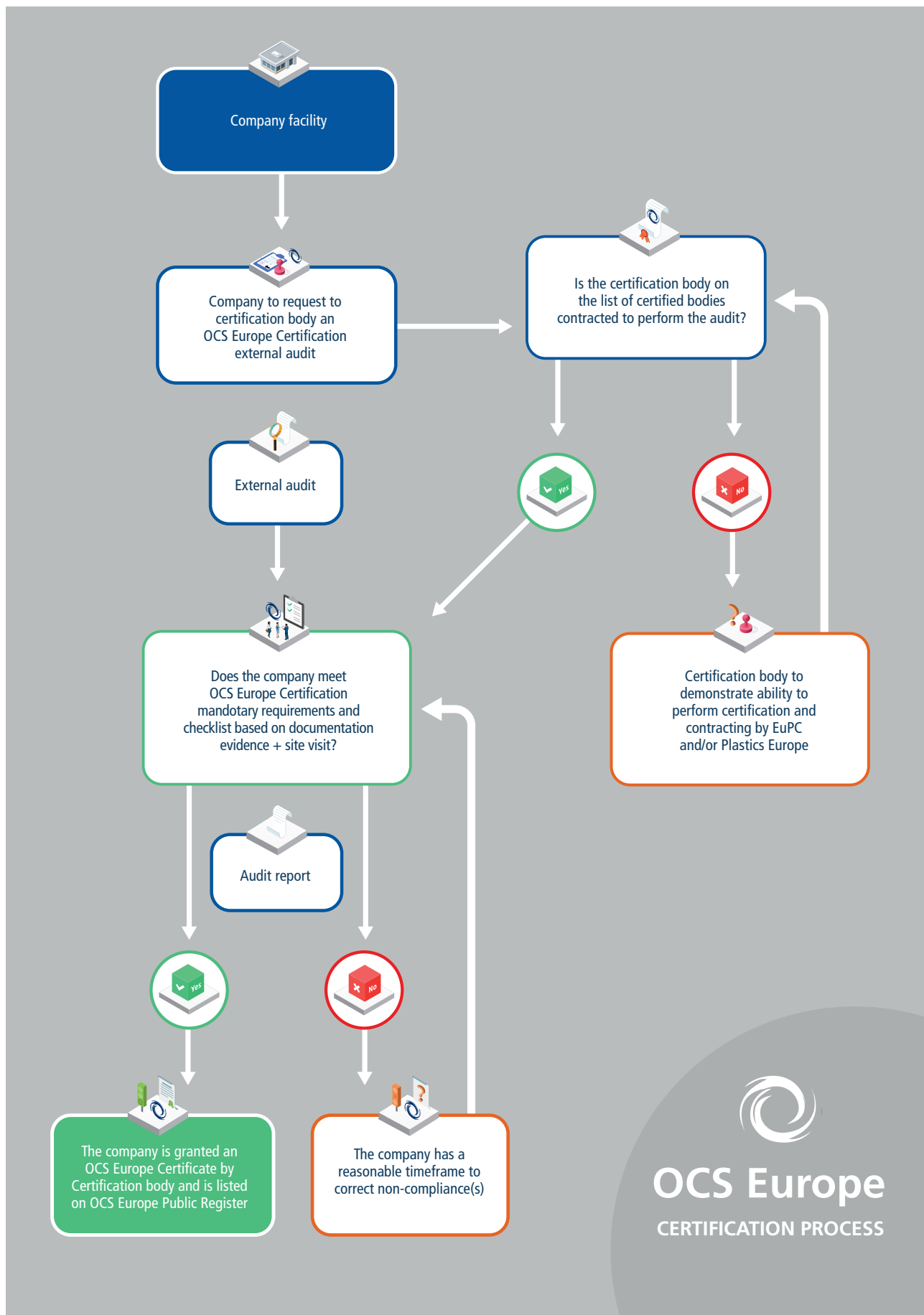
General criteria for an **OCS Certification Auditor**:

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

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

¹ A list of all OCS licensees across Europe can be found here: www.ocscertification.eu/assessedcompanies

5. Certification process



A. APPLICATION (SEE ALSO ISO 17021 §9.1.1)

When a facility expresses its intention to obtain certification according to the OCS Europe Certification Scheme, it must select a certification body from the approved list of certification bodies², complete the application that will be provided by the certification body selected, accompanied by evidence of the facility's adherence to the OCS programme, by providing their signed OCS pledge. The request must be made for each facility for which the company to be audited wants to be OCS certified. 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.

The certification bodies shall be contracted by the facility. The contract shall include clauses to be respected by the certification holder, clauses to be respected by the certification body, clauses related to complaints and sanctions at infringement. The certification body will be impartial and provide its certification service to facilities unless there are fundamental and demonstrable reasons for refusal (e.g. illegal activities of the applicant).

B. APPLICATION REVIEW (SEE ALSO ISO 17021 § 9.1.2)

The certification body will review the application and supplementary information provided by the company to ensure that the information is sufficient to develop an audit program, to resolve any differences in understanding between the applicant and the certification body.

The certification body will propose the audit plan, dates of the site visit and the audit team.

C. THE AUDIT PROGRAM (SEE ALSO ISO 17021 § 9.1.3)

A full OCS certification cycle has a duration of 3 years. In case of the initial certification this cycle is composed of the initial audit, two surveillance audits in the first and second year following the initial audit. Before the end of the third year, a recertification audit marks a new certification cycle.

The initial audit and the recertification audits are on-site audits. Surveillance audits are also conducted as physical audits. See Section 7.D.

D. AUDIT TIME

In case of an initial the audit duration depends on the size of the company, in terms of full times equivalent, as follows:

TYPE OF COMPANY	STAGE 1 (see section 6.A)	STAGE 2 (see section 6.B)
Companies with less than or equal to 50 employees (FTE)		¾ day
Companies with more than 50 and less than or equal to 250 employees (FTE)	½ day	1 day per production site
Companies with more than 250 employees (FTE)	1 day	1 day per production site
Independent assessor review		2 hours per production site

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

<http://www.ocscertification.eu/certificationbodies/public>

In case of a surveillance audit, the audit time shall be half a day per production site and is independent of the size of the company.

In case of recertification audit (renewal audit after initial certification), the audit time is as follows:

TYPE OF COMPANY	STAGE 1 (see section 6.A)
Companies with less than or equal to 50 employees (FTE)	½ day
Companies with more than 50 and less than or equal to 250 employees (FTE)	1 day per production site
Companies with more than 250 employees (FTE)	1 day per production site

In the case of an on-site audit, travel time is not included in the numbers above.

In case the certification body auditing for recertification is not the same who had done the prior certification audit, the recertification audit timings should be the same as for an initial audit.

6. Initial certification

The selected certification body shall verify that the facility has correctly implemented the appropriate measures to prevent pellet loss and therefore achieve the OCS commitment. To this aim, the selected certification body shall review the site's conformity with the OCS Requirements by performing an audit. The initial audit is composed of two stages (see also ISO 17021 clauses 9.3.1.2 and 3):

A. STAGE 1

The objectives of stage 1 are the following:

- To review the status of the applicant and their understanding of the OCS goals, the pledge and OCS-requirements, their understanding of applicable legislation, if relevant.
- To obtain the necessary information related to:
 - The applicant site and other relevant information related to the scope of the audit.
 - The processes and equipment used for handling and/or processing pellets and preventing pellet spills.
- To provide a focus for the planning of stage 2 based on sufficient understanding of the applicant's system to prevent pellets spills.
- To evaluate if a suitable and sufficient risk assessment and management plan for the facility has been established.

B. STAGE 2

The objectives of stage 2 are to evaluate the implementation of the OCS-requirements and if needed the provisions of applicable legislation related to pellet loss.

The certification body shall check, using the OCS Europe audit checklist, the implementation, including the effectiveness of the OCS Europe requirements and if relevant, the requirements of the applicable legislation related to pellet loss.

This stage 2 shall take place at the site of the applicant.

Once the audit visit is finished, the certification body shall 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 OCS audit checklist shall be an annex to the audit report. The content of the audit report is confidential. Only the answers to the OCS audit checklist shall be shared with the relevant trade association via the OCS Certification Intranet.

In the case of non-conformity, the facility will have a period of 30 days to provide evidence of corrective actions to the auditor of the certification body which will proceed to its study and evaluation. Failure to demonstrate evidence of corrective actions will result in the failure of the audit. The facility will have to re-apply for certification as described in Section 5.A.

C. PERFORMING AN AUDIT (SEE ALSO ISO 17021 §9.4)

An audit starts with an opening meeting and ends with a closing meeting, both following the ISO 17021-1 standard. During the audit the auditor shall follow the OCS-checklist and shall identify and record the audit findings. They shall also verify if findings from the previous audit have been implemented according to the agreed action plan. After the audit and during the closing meeting, the auditor shall prepare the audit conclusions and explain these conclusions and non-conformities in sufficient detail and verify that the conclusions and the non-conformities are understood by the applicant. The auditor can issue two types of non-conformities:

- A minor non-conformity does not compromise the OCS requirements. Each minor non-conformity shall require an accepted (by the auditor) action plan. The corrective action to such a shortcoming shall be verified during the following inspection. If the corrective action and its implementations are considered insufficient within the set period, the minor non-conformity becomes a major non-conformity. The certificate holder will have a period of 30 days to provide to the auditor, a corrective action plan to mitigate non-conformities. The auditor will evaluate the corrective action plan and accept or refuse it. No certificate can be issued before the acceptance of the corrective action plan. The certification body shall review the implementation progress of the corrective action plans in the surveillance audit.
- A major non-conformity is a non-conformity compromising the OCS requirements. The certificate holder will have a period of 30 days to provide to the auditor, a corrective action plan to mitigate non-conformities. The certificate holder shall perform the corrective actions within the set period with a maximum of 3 months and provide proof to the auditor of the implementation of the actions. If the corrective action and its implementation are considered insufficient, the corresponding certificate shall not be granted resp. be suspended or withdrawn.

A non-conformity shall be recorded against a specific OCS-requirement and shall contain a clear statement of the non-conformity. The complete OCS-checklist will be annexed to this report.

The audit report is deemed confidential between the company, the certification body and the OCS governing bodies.

7. Maintaining certification

The certification body shall maintain certification based on demonstration that the applicant continues to satisfy the OCS-requirements.

D. SURVEILLANCE AUDITS

The surveillance audits which are physical audits shall be carried out in order to verify that the conditions that gave rise to the granting of the certificate are still in place and to ensure continuous improvement, through the correct implementation of the action plan proposed by the organisation.

In surveillance audits, the auditor will check the maintenance of implementation of any additional corrective action plan through appropriate documentary evidence. Failure to implement the corrective action plan will result in revoking the certificate.

The OCS requirements that should be reviewed at each surveillance audit are identified in the OCS Europe requirements list.

If the facility was unable to implement the action plan for resolving minor non-conformities, then this will result in a major non-conformity.

If the facility was unable to take appropriate measures to deal with major non-conformities within a period of 30 days, the certification body shall consider one or more of the following measures, depending on the urgency and/or importance of the non-conformity:

- Observation: if a misunderstanding or negligence is at stake, the facility shall at first be informed in writing with the request to rectify. A written response should be given to enable evaluation of actions taken.
- Immediate withdrawal of the certificate or limitation of the application field: sent by registered mail

NOTE: The facility shall re-apply and go through the entire certification process as described into section 5.A.

Decision for suspension or withdrawal of certificate may be appealed subject to the Appeal procedure described in Annex III.

E. RECERTIFICATION AUDIT

The audited facility will apply for a recertification audit every three years to a certification body, in the OCS Europe list of certification bodies to check whether the conditions that gave rise to the granting of the OCS certificate are maintained.

This audit is an on-site audit with the same objectives as stage 2 of the initial audit.

During the recertification audit the following will be addressed:

- The effectiveness of the measures taken to prevent pellet spills in the light of internal and external changes,
- The commitment to maintain the effectiveness and the improvement of the measures to prevent pellet spill,

8. Evaluation and decision to award the OCS Europe-certificate

The decision to award the OCS Europe certificate will be taken by the certification body. This decision will be based on objective observations and reports of the qualified auditor and weighted against the OCS criteria. If the audit report concludes that the facility in question fulfils all requirements, i.e., that there are at most minor non-conformities for all of which there is an accepted action plan, then the certificate will be awarded.

In case of a positive decision, the certification body will issue the certificate and inform the representatives of the scheme owners.

In the event of a negative decision, the certification body will inform the applicant and will explain the reasons for this refusal. The applicant has the right to appeal against the decision towards the relevant entity OCS Europe Management Board (for the appeal procedure see Annex III). In case the refusal to issue the certificate is maintained after the appeal or the applicant does not use his right to appeal, the certification body will notify the appropriate OCS governing body, that will inform the other certification bodies acting on behalf of OCS.

9. Communication

A. USE OF OCS LOGO

In the event of a positive decision, the certification body will sign the certificate that is issued to the company. In the certificate, reference will be made to the code of adherence to the scheme and to the verification code assigned by the holder of the OCS rights³ and the expiration date of the certificate (3 years). Once the certificate has been granted, the certified facility will refer to the OCS certificate by using the following logo:



³ A list of all certification bodies for the OCS Certification Scheme can be found here: www.ocscertification.eu/certificationbodies/public

B. PUBLICATION ON THE OCS PUBLIC REGISTER

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

The following information is shown on the OCS Public Register:

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

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

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

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

Data, including that related to whether a facility passes or fails an audit, shall be kept for a minimum of 5 years. This will enable the Register Manager to determine whether a facility is regularly failing and/or re-applying to join the Register. The Register Manager should keep records of companies that have failed an audit, but this shall not be made public.

C. REMOVAL FROM REGISTRY

When a site/company fails a surveillance 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 can re-apply for the certification as described in section 5.A or follow an appeal procedure as laid down in section xxx.

D. ASSESSMENT OF COMPLIANCE WITH OCS MANDATORY REQUIREMENTS IN SQAS AND PUBLICATION IN OCS 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 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 OCS Public Register as OCS 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 mandatory requirements".
- If the assessment shows that the facility is not complying with all the OCS mandatory requirements, the company will have to carry out intermediate(s) assessment(s) till this status is reached. If during an SQAS intermediate or re-assessment, there is evidence that a logistics service provider or distributor does not fulfil the OCS Europe requirements, SQAS will inform the Scheme managers that the attestation report is not valid and the of logistics service provider or distributor will be removed from the OCS Europe certification public register.

10. Annual Reporting

A. TO SECTORAL TRADE ASSOCIATIONS

The annual reporting includes the evaluation of pellet loss and the recording of incidents resulting in losses to the environment.

This information is then compiled by the association and published in an annual report on a sectoral and National level within the limits of competition law compliance.

B. TO AUDITOR

Results of annual OCS Management Review (See chapter 4 of OCS requirements)

11. Definitions

LIST OF CONCEPTS	DEFINITION
Audit	An official, systematic, independent and documented process for obtaining objective evidence and evaluating it objectively to determine the extent to which the audit criteria are fulfilled (source : ISO 9000:2015).
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: ISO 9000:2015).
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"> ■ 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, ■ in areas with high traffic (e.g. near gates), ■ in areas close to the fence line, ■ nearby graveled or non-paved areas, ■ in areas where loose pellets may be picked up by the wind or water (rain) and transported outside, ■ ... <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: ISO 9000:2015).

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LIST OF CONCEPTS	DEFINITION
Near-miss	Incident where an unplanned event does not lead to a loss of pellets to the environment, but has the potential to do so. NOTE: An example of a near-miss is where a spill occurred (or almost occurs) that almost leads to a loss to the environment due to failures of one or more processes or containment measures.
Non-conformity	Non-fulfilment of OCS Core requirements or compulsory specific requirements. A minor non-conformity does not compromise the fulfilment of the OCS scheme requirements. ----- A major non-conformity compromises the fulfilment of the OCS scheme requirements.
OCS Europe Core Requirements	OCS common requirements to the entire plastics value chain
OCS Europe Reporting Requirements	Requirements of the OCS Europe Certification Scheme specific to a particular part of the plastics value chain.
OCS Europe Specific Requirements	OCS requirements specific to one part of the plastics value chain.
Performance	Measurable result (Source: ISO 9000:2015)
Objective	Result to be achieved (source: ISO 9000:2015)
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	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)) NOTE 1: throughout this document plastic pellets, powders, flakes and dust, including recycled material, are referred to as "pellets" a) Plastic powder: fine particulate matter that serves as a feedstock in plastic product manufacturing operations. 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. c) Plastic dust: fine particulate matter with irregular form and size, produced when plastics are manufactured, handled, conveyed, machined or processed. NOTE 2: Pellets are produced in many colours. Plastic pellets are also known as "granules" or "nurdles" and are normally spherical or lenticular in shape. NOTE 3: In some countries, plastic can also be termed "resin".
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 I: Governance of the Operational Clean Sweep certification scheme

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

OCS EU SUPERVISORY BOARD

Composition:

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

Remits:

The OCS Supervisory Board takes decisions on critical aspects of the Scheme. This would consist in the approval criteria for new requirements, training, certification bodies and certification body accreditation and inclusion in the Scheme's public register.

The OCS Supervisory Board reviews feedback on the scheme implementation by auditors/certification bodies with a view of a consistent implementation and interpretation of the 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 OCS 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.

OCS EU MANAGEMENT BOARD

Composition:

2 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 administer funds allocated by Plastics Europe and EuPC.

Decision making:

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

(*) 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

OCS EU TECHNICAL COMMITTEE

Composition:

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

Remits:

- Develop the OCS Europe Core Requirements;
- Review the different OCS Europe Specific Requirements of each OCS Europe Certification Modules to ensure coherency;
- Participate in the testing of the software developed;
- Ensures a technical follow-up of the scheme to improve quality and consistency control 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 report to the Management and Supervisory Board.

Decision making:

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

QUALITY BOARD

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.
- Review complaints regarding certificate allocation and inform the Management Board accordingly

Auditors Independence:

Observers may only make observations to be communicated to the Technical committee, Management Board. They do not 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.

Annex II: OCS 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 can be transferred to certified bodies and vice versa when the scheme evolves. One must note that a reporting on pellet loss to trade association is foreseen and in addition that regular surveys shall be organized by trade association to gain knowledge and transfer best practice across certified companies.

INFORMATION GENERATION 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 objectives based on their knowledge of the industrial process to be certified, the review of documentary evidence and in situ inspections. They are assisted by a predefined auditor check list to guide the audit and the answers of this check list will be communicated in an IT system.

THE ROLE OF OCS TECHNICAL COMMITTEE

The OCS 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 updates on knowledge gained through survey/other feedback
- 3 Critical variations observed in the implementation of the scheme flagged by the IT system statistics, such as recurring questions/comments in the "uploaded report" (see IT)

Three types of follow-up actions might occur:

- 1 Update of guidance/issue of new guidance/interpretation document to auditors and companies to be certified
- 2 Use of an observer during an audit to improve understanding on particular issues
- 3 Recommendation for modification of the requirements, if necessary

TRAINING

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

Certification bodies must have attended a specific training course on the OCS certification carried out by an OCS licensee entity. The auditors of a specific certification body must attend either a specific training course carried out by an OCS licensee or by the OCS scheme responsible at the certification body. On a regular basis (yearly in the beginning, and then every two years or after a major review of the scheme) those certification bodies and auditors are retrained. It is the task of the certification bodies to train any auditors unable to attend the training carried out by the OCS licensees. SQAS auditors will be trained by Cefic.

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.

There is also a field for main conclusion/remarks of the audit.

Detailed recommendations to companies (the audit report and supporting documentation) are not uploaded in the system 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 four purposes:

- 1 First and foremost, the statistics facilitate future scheme improvements by improving understanding of areas of uncertainty/difficulty of implementation of OCS scheme requirements by facilities.
- 2 The statistics also enable the Trade association to proceed to external reporting (transparency or meeting regulatory obligations) and conduct their own 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, or atypical auditors' profiles by certification bodies which may trigger a corrective action.

Certification bodies shall have access to the results of the checklist from their auditors as well as OCS licensees scheme owners 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 two fields will be particularly scrutinized by the Trade Associations in a regular review.

CONTROL OF AUDITORS

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

Annex III: Appeal procedure

- 1 When a company undergoing certification disagrees with the results of an audit granting, suspending or withdrawing a certification, it may appeal to the OCS Management Board.

The information with due motivation of the complaints and evidence is sent to the Plastics Europe secretariat if the audit concerns a resin manufacturer or integrated compounder, to EuPC if the audit concerns an independent master-batcher, compounder or converter, and to both EuPC and Plastics Europe secretariats when the company to be certified is active in transport and logistics.

- 2 The secretariat informs the Management Board of the complaint removing confidential elements or those that may be sensitive from a competition law point of view.
- 3 The management board may:
 - a. Based on the provided information reject the complaint, or
 - b. Delegate the analysis of the matter to the Quality Board.
- 4 The Quality Board may:
 - a. appoint an observer from the quality board to revise the written documentation regarding the complaint (including confidential information). The observer will then make a report to the Management Board, or
 - b. appoint an observer to repeat the audit in the presence of the certification body. The certification body and company may jointly appoint an independent expert to also attend the audit
- 5 The Quality Board will provide a written recommendation to the Management Board whether or not the certificate should be awarded or inform the Management Board if there have been irregularities in the procedure for allocating the certificate
- 6 The Management Board based on the recommendation of the Quality Board may
 - a. Decide on the granting, suspension, or withdrawal of certification
 - b. request a review by the Technical Committee of rules and principles, requirements or guidance if necessary
 - c. Take necessary measures if there is a breach in the contract with the certification body.
- 7 In case a company/ certification body disagreement on the decisions made by the Supervisory Board on the interpretation or application of a requirement, rule or principle, the matter will be addressed by the Supervisory Board.
- 8 The Management Board shall make a report on the ongoing and decided appeal procedures at each Supervisory Board meeting.