



VERSION 1 (JANUARY 2025)







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INTRODUCTION

Operation Clean Sweep® (OCS) is an industry-led program that supports companies in their goal towards achieving zero plastic resin loss in operations. OCS was founded by Plastics Industry Association (PLASTICS) in 1991 and is managed in partnership with the American Chemistry Council (ACC) Plastics Division. OCS Logistics was launched in 2024 and is dedicated to supporting transportation and service providers in safeguarding plastic resin during handling and transport.

OCS Logistics members demonstrate significant leadership in industry-led voluntary stewardship to protect the environment, preserve water quality and wildlife, and strengthen worker safety. Any company that physically handles preproduction plastic resin or arranges for its transportation in the United States is eligible to join OCS Logistics as a member. All OCS Logistics members commit to both the OCS requirements and OCS Logistics requirements, below.

OCS REQUIREMENTS

- 1. Commit to making zero plastic resin loss a priority and sign the OCS Pledge.
- 2. Assess your company's situation and needs.
- 3. Make necessary upgrades in facilities and equipment as appropriate.
- 4. Raise employee awareness and create accountability.
- 5. Follow up and enforce procedures, including routine inspections and continuous improvement.



OCS LOGISTICS REQUIREMENTS

OCS Logistics requires that 100% of a company's facilities in the US that handle or service plastic resin are onboarded to the program and requires the enhanced management practices, summarized below. OCS Logistics Verification will be a new requirement for all OCS Logistics members (with the exception of OCS Rail and OCS Maritime) following the launch of OCS Logistics Verification in January 2025.

- 1. Conduct training during initial onboarding and regular training on an ongoing basis for employees, owner-operators, affiliates, and contractors on resin handling, loss prevention, containment, and clean up.
- 2. Display the OCS Logistics certificate, plaque, and posters in public areas to reinforce commitment.
- 3. Periodically conduct risk assessments focused on transportation, handling, and site processes.
- 4. Periodically conduct internal audits to confirm whether management systems meet the requirements and objectives of OCS Logistics.
- 5. Enable employees, owner-operators, affiliates, and contractors to provide feedback on the company's plastic resin containment program.
- 6. Establish written procedures and checklists to locate potential risks, prevent resin loss, and manage clean up.
- 7. Develop and implement a Spill Response Plan.
- 8. Educate supply chain partners to help them understand the importance of OCS and their participation.
- 9. Participate in an OCS event at least once per year.
- 10. Report OCS Metrics at required frequency.
- 11. Complete OCS Logistics Verification for required facilities during each verification cycle.

Please reach out to <u>info@opcleansweep.org</u> with any questions related to OCS, OCS Blue, or OCS Logistics membership, as well as any inquiries about international OCS programs, which currently operate in more than 60 countries worldwide.



OCS LOGISTICS VERIFICATION

The development of OCS Logistics Verification represents the next step in the evolution of the OCS program, catalyzed by the commitment of OCS Logistics members to end plastic resin loss in operations. The OCS Logistics Verification program was developed between 2023 and 2024 and will begin in January 2025.

The OCS Logistics Verification program verifies implementation of required OCS Logistics management practices at the facility and operational level for OCS Logistics member companies in the United States. OCS Logistics Verification will be a requirement for all OCS Logistics members beginning after OCS Logistics Verification launches in January 2025, providing a new level of strength and transparency in the program. The verification program as described in this guide is exclusive to the OCS Logistics program in the US.

This Guide to OCS Logistics Verification summarizes how the program works, the requirements for OCS Logistics members, and the process to achieve OCS Logistics Verification. The OCS Logistics Verification program and related documents will be updated periodically and all versions will be accessible on the OCS website (opcleansweep.org). In addition to this guide, please consult the OCS Logistics Verification Framework, which details the required management practices that comprise the OCS Logistics Verification inspection itself.

ALIGNMENT WITH KEY PROGRAMS

OCS Logistics Verification is designed to be aligned with several key programs that companies throughout the plastics value chain frequently participate in. These programs include OCS Blue Verification, Responsible Care® certification, ISO14001 certification, and ISO9001 certification. Additionally, the OCS Logistics Verification program is aligned with the OCS inspection programs that operate in certain jurisdictions, including Europe, Mexico, Brazil, and New Zealand. Please reach out to info@opcleansweep.org for more information on the OCS verification and certification programs administered outside of the US.

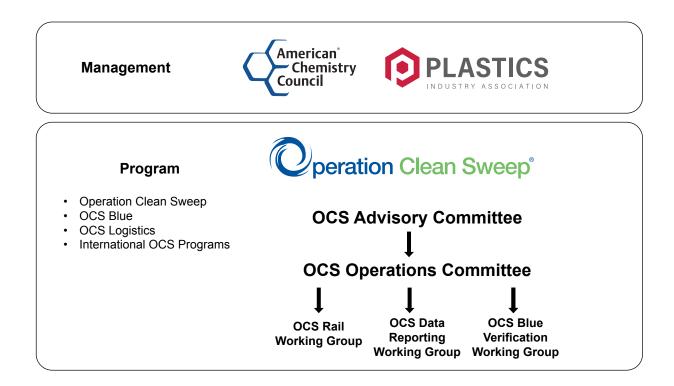
PROGRAM ADMINISTRATION & GUIDANCE

Operation Clean Sweep, including OCS Logistics Verification, is operated in partnership by PLASTICS and ACC's Plastics Division. Four key groups support program staff in the administration of the program: the OCS Advisory Committee, the OCS Operations Committee, the OCS Blue Verification Working Group, and the OCS Logistics Verification Task Force.

The OCS Advisory Committee provides strategic guidance to the program and comprises eight appointed OCS members that have demonstrated strong leadership in working to end plastic resin loss in operations. Each OCS member appointed to the OCS Advisory Committee designates a senior executive leader to serve on the committee on a rotating basis for a two-year term.



The OCS Operations Committee comprises representatives with technical expertise from OCS Blue and OCS Logistics member companies. This Committee also supports the OCS Blue Verification Working Group, which developed and maintains the technical program requirements for OCS Blue Verification, as well as the OCS Logistics Verification Task Force, which developed and maintains the technical program requirements for the OCS Logistics Verification program.



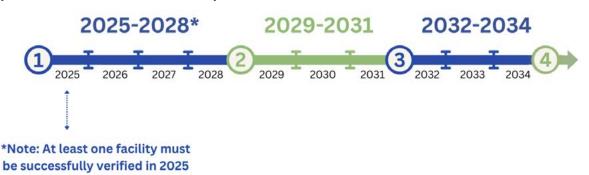
Decisions on program administration are made through consensus whenever possible within the OCS Advisory Committee and OCS Operations Committee and in collaboration with PLASTICS and ACC Plastics Division program staff.



VERIFICATION CYCLE TIMING

OCS Logistics Verification will be administered in verification cycles. The first verification cycle will begin in January 2025 and have a duration of four years, terminating in December 2028 in order to gain alignment with the OCS Blue Verification cycle. During the first OCS Logistics Verification cycle, one facility per OCS Logistics member must be verified by December 31st, 2025 and remaining required facilities by December 31st, 2028.

All future OCS Logistics Verification cycles will be three-years and match the OCS Blue Verification cycle exactly, where the verification cycle will start on January 1st of the first year and end on December 31st of the third year. The first three verification cycles are as follows:



The three-year cycle duration and the timing of cycles is designed to align with the cycles for OCS Blue Verification, Responsible Care®, and the OCS Europe Certification Scheme to streamline implementation for OCS members who participate in each program.

A facility that achieves OCS Logistics Verification will be verified for a period of three years. For example, if a facility achieves OCS Logistics Verification on March 1st, 2026, verified status will last through March 1st, 2029 and the Certificate of Verification will reflect the March 1st, 2026 through March 1st, 2029 dates. For 2025 only, an exception will be made due to the extended nature of the first four-year verification cycle and the validity for 2025 verifications will have a duration of four years. For example, a facility that completes verification on June 1st, 2025 will be valid through June 1st, 2029.

For a company joining OCS Logistics for the first time, which cycle mandatory participation in OCS Logistics Verification begins will depend on what point in the verification cycle the company joins. If a company joins with more than half of the current verification cycle remaining, participation in OCS Logistics Verification is required during the current verification cycle. But, if a company joins OCS Logistics with less than half of the current verification cycle remaining, participation can begin in the following verification cycle. For example, if a new company joins OCS Logistics in March of 2026, they will be required to achieve OCS Logistics Verification for their required facilities in the current 2025-2028 verification cycle, because there is more than half of the verification cycle remaining. However, if a new company joins OCS Logistics in September of 2027 with less than half of the verification cycle remaining, they may participate in the 2029-2031 verification cycle. Please reach out to info@opcleansweep.org with any questions about verification cycle timing.



FACILITY-LEVEL VERIFICATION

OCS Logistics Verification occurs at the facility-level and is achieved through a successful on-site inspection by an approved OCS Logistics Verifier that assesses the implementation of facility management practices detailed in the "OCS Logistics Verification Framework". Each OCS Logistics member is required to achieve OCS Logistics Verification for a portion of their US plastic-handling facilities during each verification cycle and 100% of facilities across multiple verification cycles.

All OCS Logistics members commit to maintaining up-to-date records of all US-based plastic handling facilities with the OCS program. Please reach out to info@opcleansweep.org if you need to confirm your company's facility records or make any changes to them.

KEY DEFINITIONS

The following definitions are important to ensure consistency in the OCS Logistics Verification program. They are also useful to help OCS Logistics members understand the total number of facilities in their portfolio when determining the subset required to achieve OCS Logistics Verification in each cycle.

- Logistics Facility: One or more plastic resin handling logistics operations within a defined physical
 boundary that are operated or controlled by a specific legal organization where the primary business
 activity is not material manufacturing or processing and does include one or more of the following
 elements: physical assets, management, dispatch, equipment, drivers, maintenance, tank wash and
 container cleaning, support functions, warehousing, transloading, loading, unloading, bulk breaking,
 transfer of plastic resin from bulk containers to individual containers, and transfer of plastic resin from
 individual containers to bulk containers.
- Plastic resin handling operation: An operation that handles at least one ton of preproduction plastic resin per year and manufactures, transports, warehouses, distributes, repackages, processes, and/or converts plastic resin.
- **Plastic resin:** A solid material which contains as an essential ingredient one or more high-molecular mass polymers and which is formed (shaped) during either manufacture of the polymer or the fabrication into a finished product by heat and/or pressure.
- Physical boundary: The limit point of where land owned or controlled by the organization is legally recognized, including plant outfalls, the point at which surface water drains, and/or and sewers discharge into the public sewer or controlled waters.

In certain instances, it may be difficult to distinguish if a cluster of plastic resin handling operations are one facility or multiple facilities. It is recommended that a cluster of resin handling operations are considered one facility when in close geographic proximity and have the same management. It is recommended that multiple resin handling operations are considered separate facilities if they are not in close geographic proximity and/or have different management. For any questions or unique cases, please reach out to info@opcleansweep.org.



REQUIRED FACILITIES FOR EACH VERIFICATION CYCLE

While OCS Logistics members must implement OCS at 100% of all US-based plastic-handling facilities, only a subset are required to achieve OCS Logistics Verification for each cycle. Over multiple verification cycles, all facilities will achieve verification. The percentage of facilities required to achieve OCS Logistics Verification for each verification cycle is based on the OCS Logistics member's total number of facilities and divided into three tiers.

Total Number of Facilities	Facilities Required for Verification Cycle
1-20 Facilities	33%
21-50 Facilities	25%
51+ Facilities	20%

If an OCS Logistics member has a number of facilities that is not exactly divisible by the percentage required, the number of facilities will be rounded up. For example, if an OCS Logistics member has 5 facilities, 2 facilities will be required to achieve OCS Logistics verification during each verification cycle to meet the 33% requirement. If an OCS Logistics member has one facility, that same facility will participate in each verification cycle. These guidelines are designed to be consistent with the protocols of peer inspection and certification programs.

An OCS Logistics member may voluntarily elect to have a greater number of facilities secure OCS Logistics Verification than the required percentage in a verification cycle, if they so choose. However, this will not impact the minimum number of facilities required to achieve OCS Logistics Verification in future cycles.

SELECTING FACILITIES FOR EACH VERIFICATION CYCLE

For each verification cycle, the OCS Logistics member will establish the number of facilities required to achieve OCS Logistics Verification and identify the specific facilities from their portfolio. It is at the OCS Logistics member's sole discretion to identify the individual facilities to achieve OCS Logistics Verification for each verification cycle. The OCS program recommends that OCS Logistics members select a mix of facilities based on geography, size, function, and if a triggering event has taken place, which may include a facility acquisition or a significant resin release incident. In each proceeding verification cycle, a new group of facilities must be selected until all facilities have attained OCS Logistics Verification, as described below.

- For OCS Logistics members with 1-20 facilities where 33% are required to achieve OCS Logistics Verification in each cycle, all facilities must secure verification at the conclusion of three cycles.
- For OCS Logistics members with 21-50 facilities where 25% are required to achieve OCS Logistics Verification in each cycle, all facilities must secure verification at the conclusion of four cycles.
- For OCS Logistics members with 51 or more facilities where 20% are required to achieve OCS Logistics Verification in each cycle, all facilities must secure verification at the conclusion of five cycles.



OCS LOGISTICS VERIFICATION PROCESS

For a complete visual of the OCS Logistics Verification process, please consult Appendix A.

OCS LOGISTICS VERIFICATION INSPECTION

The OCS Logistics Verification process entails an on-site inspection of an OCS Logistics member facility performed by an approved OCS Logistics Verifier. During the inspection, the OCS Logistics Verifier will assess implementation of management practices at the facility with the "OCS Logistics Verification Framework", which details all required OCS Logistics management practices and documentation that the OCS Logistics Verifier can request. In order to assess implementation, the OCS Logistics Verifier will review documentation provided by the OCS Logistics company, as well as make on-site observations and conduct on-site interviews to determine implementation of management practices.

Documentation should be provided by the OCS Logistics member to the OCS Logistics Verifier in advance to support an efficient on-site inspection. Documentation may be aggregated in the OCS Logistics Verification Workbook, but it is not a required format and is an optional resource. After an OCS Logistics Verification inspection is conducted, the OCS Logistics Verifier will provide a detailed report to the OCS Logistics company with full findings, including the identification of any gaps present.

CORRECTIVE ACTION PROCESS

For any gaps identified by the OCS Logistics Verifier during the OCS Logistics Verification inspection, the OCS Logistics member will proceed with the corrective action process. The corrective action process will occur exclusively between the OCS Logistics Verifier and OCS Logistics member. The corrective action process will entail a "Corrective Action Response" that the OCS Logistics member will submit to the OCS Logistics Verifier within 60 days from the receipt of the detailed report identifying the gap.

The Corrective Action Response that the OCS Logistics member submits to the OCS Logistics Verifier will include the gap identified, a root cause investigation of the gap, the corrective action taken, and future actions planned. Evaluation of the effectiveness of the corrective action is encouraged. Evidence included in the Corrective Action Response may include photographs, video, receipts, and other digital evidence, which can be virtually submitted to the OCS Logistics Verifier for evaluation. After determination by the OCS Logistics Verifier that the Corrective Action Response successfully demonstrates implementation of the required management practice, the OCS Logistics Verifier will proceed to notify the OCS program of a successful OCS Logistics Verification inspection as described below.

NOTIFICATION TO THE OCS PROGRAM

For OCS Logistics Verification inspections that establish successful implementation of the facility's management practices with required OCS Logistics management practices, a high-level summary will be sent to the OCS program. The OCS Logistics Verification Summary Report is included in Appendix B. Once the Summary Report is received by the OCS program, an OCS Logistics Certificate of Verification for the facility will be provided by the OCS Program to the OCS Logistics member and the facility will be added to the OCS Verified Facility Registry, which will be publicly available online.



SCHEDULING AN OCS LOGISTICS VERIFICATION INSPECTION

OCS Logistics members may schedule a standalone OCS Logistics Verification inspection with an approved OCS Logistics Verifier. Scheduling and pricing for an OCS Logistics Verification inspection is arranged exclusively between the OCS Logistics member and the OCS Logistics Verifier.

For OCS Logistics members that participate in other programs that require on-site inspection, such as Responsible Care® and ISO 14001 Certification, it may be beneficial to schedule the OCS Logistics Verification inspection adjacent to inspections required for other programs.

The OCS Logistics program has no preference as to whether the OCS Logistics Verification inspection occurs in a standalone fashion, adjacent to another management system inspection, or integrated into another management system inspection. It is anticipated that OCS Logistics Verification inspections will take approximately one day in length if scheduled in a standalone capacity or adjacent to a separate inspection, however duration is informed by several variables including the nature of operations and size of facility, among others.

INTEGRATION OF OCS LOGISTICS INTO MANAGEMENT SYSTEMS

Optionally, OCS Logistics members may wish to integrate OCS Logistics management practices into environmental management systems in which they already participate. In these instances, it may be convenient to arrange for the OCS Logistics Verification inspection to be embedded within the inspection for a broader management system program.

Examples of other management systems that OCS Blue could potentially be fully or partially integrated into include RCMS:2023, RC14001:2023, ISO14001:2015, or ISO 9001:2015. To explore an OCS Logistics Verification inspection that's integrated into the inspection for a broader management system, OCS Logistics members should contact their audit service provider (ASP) to discuss possibilities.

In addition to the environmental management systems above, it may be possible to partially integrate OCS Logistics management practices into quality management systems adhering to ISO9001:2015. If an OCS Logistics member is interested in exploring an OCS Logistics Verification inspection being integrated into the inspection for a quality management system, additional consultation may be necessary with an ASP.

OCS Logistics Verification inspections can be conducted by approved OCS Logistics Verifiers with ASPs and independent consultancies that meet the specific criteria below and complete OCS Logistics Verifier Training, as described in the next section. The OCS program maintains a list of all organizations with approved OCS Verifiers on the OCS Verifier List online and regularly provides OCS Logistics Verifier Training. ASPs and consultancies with approved OCS Logistics Verifiers are expected to maintain records for verification inspections completed.



APPROVED VERIFIERS

OCS LOGISTICS VERIFIER QUALIFICATIONS

Individuals who are fully qualified by an ASP to audit ISO14001, ISO45001, ISO9001, or RCMS®/RC14001® are automatically qualified to serve as verifiers for OCS Logistics upon completion of both the OCS Blue Verification training and OCS Logistics Verifier Training. Generally, individuals may be eligible to qualify as an OCS Logistics Verifier by fulfilling at least one option in each of the qualification sections below.

Please reach out to <u>info@opcleansweep.org</u> with any questions about OCS Blue Verifier or OCS Logistics Verifier eligibility criteria or qualifications.

PROFESSIONAL EXPERIENCE

- **Option 1:** Successful attainment of the rank "Provisional Auditor" or "Lead Auditor" in ISO14001, ISO45001, ISO9001, and/or RCMS®/RC14001®, as well as a minimum of one year of employment or as a contractor with an ASP.
- **Option 2:** A proven track record as an independent consultant in environmental, health, and safety management systems within the manufacturing, chemical, plastics, or logistics industries with at least four years of experience.

KNOWLEDGE OF MANAGEMENT SYSTEMS

- **Option 1:** Successful completion of a training course on conformance auditing of management systems for ISO14001, ISO45001, ISO9001, and/or RCMS®/RC14001®.
- Option 2: Certification by Exemplar Global for ISO14001, ISO9001, ISO45001, and/or Responsible Care[®].

KNOWLEDGE OF OCS LOGISTICS VERIFICATION

Option 1: Review of the OCS Manual, the OCS Logistics Verification Guide, and the OCS Logistics Verification Framework, as well as completion of the OCS Blue Verifier Training and the OCS Logistics Verifier Training.



APPENDIX A: OCS LOGISTICS VERIFICATION PROCESS

OCS Logistics Verification Process

Company joins OCS Logistics

Required OCS Logistics management practices are implemented at all facilities

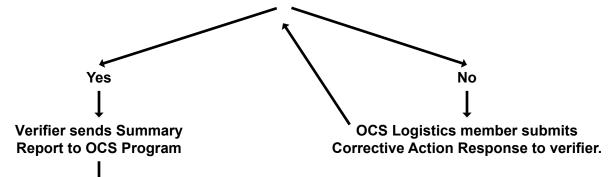
OCS Logistics member identifies required number of facilities for verification cycle and selects facilities

OCS Logistics member contracts with an approved OCS Logistics Verifier to conduct the on-site facility inspection

On-site facility inspection is scheduled and OCS Logistics member shares documentation of management practices

OCS Logistics Verifier conducts on-site facility inspection and provides detailed report to OCS Logistics member

Does the facility demonstrated successful implementation of all required OCS Logistics management practices?



OCS Program provides a
Certificate of Verification to OCS
Logistics member and adds facility to
the OCS Verified Facility Registry



APPENDIX B: OCS LOGISTICS VERIFICATION SUMMARY REPORT

The OCS Logistics Verification Summary Report can be submitted to the OCS Program by approved OCS Verifiers, demonstrating the completion of an OCS Logistics Verification inspection that has verified the successful implementation of all required management practices at an active OCS Logistics member's US facility. All required management practices are detailed in the OCS Logistics Verification Framework.

Upon successful completion of an OCS Logistics Verification inspection, this Summary Report should be completed by the OCS Verifier. The Summary Report must be submitted to the OCS Program by emailing info@opcleansweep.org and a second copy should be sent directly to the OCS Logistics member. Following review, the OCS Program will issue a Certificate of Verification to the OCS Logistics member and share a second copy with the OCS Verifier. The facility will also be added to the OCS Verified Facility Registry online.

With any questions on how to complete this Summary Report, please reach out to info@opcleansweep.org.

OCS Logistics Company Information						
OCS Logistics Company:						
Full Facility Address:						
Facility Name	(if applicable):					
Number of employees and contractors at facility:						
Facility Contact	Name:					
	Title:					
	Email:					
	Phone Number:					



APPENDIX B: OCS LOGISTICS VERIFICATION SUMMARY REPORT

OCS Verifier Information					
	Name:				
OCS Verifier Information	Title:				
	Email:				
	Phone Number:				
	Verifier Number:				
Company/O	rganization:				
Outcome of OCS Logistics Verification Inspection					
Date(s) of Inspection:					
Verification Outcome:	Check one of the following options: Successful implementation of all required management practices observed during inspection (complete Corrective Action Process below).				
Corrective Action Process:	Date of submission Corrective Action (Must be within 60 days	Response:			
	Successful implen			Yes	No



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