



Operation Clean Sweep<sup>®</sup> | blue



# OCS BLUE VERIFICATION FRAMEWORK

Required Management Practices

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VERSION 1 (SEPTEMBER 2023)



## OCS Blue Verification Framework

### Required Management Practices

0. Commit to Making Zero Resin Loss A Priority	
A.	The OCS Pledge has been signed by senior leadership and has been communicated internally.
B.	OCS has been incorporated into company and facility goals.
C.	<p>OCS membership and/or activities have been incorporated into each applicable location: company website, annual reports, and/or ESG reporting.</p> <p>*Company websites are applicable if they are publicly accessible.            **Annual reports and ESG reporting conducted after the company becomes an OCS Blue member are applicable.</p>
OCS Blue Verifier Checklist	Guidance
A.	<p>Has senior leadership signed the OCS Pledge and communicated it internally?</p> <p>The OCS Blue Verifier can:</p> <ul style="list-style-type: none"> <li>Check that the company is listed on the Operation Clean Sweep website as an active member of OCS Blue.</li> <li>Interview senior leadership of the business unit(s) relevant to OCS at facility to confirm that they know and understand OCS Blue management practices.</li> <li>Request documentation that the company's OCS and/or OCS Blue membership has been communicated to employees and contractors.</li> </ul>
B.	<p>Has OCS been incorporated into company and facility goals?</p> <p>The OCS Blue Verifier can:</p> <ul style="list-style-type: none"> <li>Request documentation that preventing and mitigating resin loss is incorporated into company and site goals.</li> </ul>
C.	<p>Has OCS membership and/or activities been incorporated into company website, annual reports, and/or ESG reporting, if applicable?</p> <p>The OCS Blue Verifier can:</p> <ul style="list-style-type: none"> <li>Request and review the applicable documentation that demonstrates where OCS membership and/or activities are incorporated.</li> </ul>

# 1. Assess Facility Situation, Risks, and Opportunities

A. Risk assessment of facility has been conducted to identify areas where plastic resin loss can occur and measures to prevent and mitigate risk.

Risk assessment must:

- Identify areas where resin loss can occur within facility's physical boundaries.
- Assess likelihood of resin loss in identified areas and assign a priority for the risk assessed in each area.
- Identify potential pathways for resin loss from facility to the external environment.
- Identify equipment and procedures to prevent spills in each risk area, as well as preventative maintenance needed for equipment on an ongoing basis.
- Identify equipment and procedures to contain, handle, and clean-up spilled resin in each risk area.
- Assess gaps between current state and identified equipment and procedures to prevent, contain, handle, and clean-up resin spills.
- Develop action items to close gaps between the current state and needed equipment and procedures.

B. System has been created to track action items identified in risk assessment with the ability to monitor the status of each action item (for example: not started, in progress, and completed).

C. Risk assessment is updated at least once per year and/or integrated into ongoing management system processes that occur at least once per year.

OCS Blue Verifier Checklist	Guidance
<p>A. Has a facility risk assessment been completed to identify areas where plastic resin loss can occur and measures to prevent and mitigate risk? (All required components included)</p>	<p>The OCS Blue Verifier can:</p> <ul style="list-style-type: none"> <li>• Review facility risk assessment.</li> <li>• Request a facility map (if not already included in the facility risk assessment).</li> </ul>
<p>B. Has a system been created to track action items identified in the risk assessment with the ability to monitor their status?</p>	<p>The OCS Blue Verifier can:</p> <ul style="list-style-type: none"> <li>• Request evidence of the system created to track action items identified in the risk assessment with the ability to monitor the status of each action item.</li> </ul>
<p>C. Has risk assessment been updated at least once per year and/or integrated into ongoing management system processes that occur at least once per year?</p>	<p>The OCS Blue Verifier can:</p> <ul style="list-style-type: none"> <li>• Request evidence that the risk assessment has been completed and updated at least once per year.</li> <li>• Or, request evidence of the management system process that has fully integrated the risk assessment and occurs at least once per year.</li> </ul>

## 2. Create and Publish Internal Procedures Towards Zero Plastic Resin Loss

A. Incorporate strategies to prevent and mitigate plastic resin loss into existing housekeeping and operating inspections and procedures, including:

- Strategies to prevent spills of plastic resin.
- Strategies to clean up resin in the event of a spill.
- Visual inspection of plant outfalls and facility fence line (either entire or sample of higher risk areas).
- Description of roles and responsibilities to respond to a spill in the event one occurs.
- Instructions on proper disposal or recycling of spilled resin following a clean-up.

B. Conduct periodic housekeeping inspections at a defined frequency, that incorporate:

- Resin loss prevention and mitigation strategies as defined in operating procedures and checklists.
- Visual inspection of facility fence line (defined in operating procedures as either entire fence line or sample of higher risk areas).
- Visual inspection of outfalls.

C. Maintain an investigation and corrective action process that enables incidents of resin loss to be reported. Process must, at a minimum, enable incidents that are reportable as OCS Blue Metrics for required data reporting to be tracked.

D. Periodically review process and status of incident investigations and corrective action for completion and effectiveness.

E. Update resin loss prevention checklists and/or procedures as needed to drive continual improvement and incorporate learnings.

F. Incorporate performance related to plastic resin loss into periodic, internal EHSQ Management reviews or similar corporate position.

G. Report all required OCS Blue Metrics to the OCS Program during each required reporting cycle.

### OCS Blue Verifier Checklist

### Guidance

A. Have strategies to prevent and mitigate plastic resin loss been incorporated into existing house keeping and operating inspections and procedures? (All required components included)

The OCS Blue Verifier can:

- Request copies of housekeeping and operating inspections and procedures to ensure that strategies to prevent and mitigate plastic resin loss have been incorporated.

<p>B. Are periodic housekeeping inspections conducted at a defined frequency? (All required components included)</p>	<p>The OCS Blue Verifier can:</p> <ul style="list-style-type: none"> <li>Request evidence of housekeeping inspection protocols and/or checklists (all required components included).</li> <li>Request evidence of prior housekeeping inspections having been conducted.</li> <li>Request evidence that future housekeeping inspections are scheduled or have a defined frequency.</li> <li>Conduct a visual inspection of the outfall and fence line as defined in operating procedures.</li> </ul>
<p>C. Is a process maintained for investigation and corrective action that enables incidents of resin loss to be reported? (Process must, at a minimum, enable incidents that are reportable as OCS Blue Metrics for required data reporting to be tracked.)</p>	<p>The OCS Blue Verifier can:</p> <ul style="list-style-type: none"> <li>Request evidence of the process for investigation and corrective action that enables incidents of resin loss to be reported. (Process must, at a minimum, enable incidents that are reportable as OCS Blue Metrics for required data reporting to be tracked.)</li> </ul>
<p>D. Is the process and status of incident investigations and corrective action reviewed periodically for completion and effectiveness?</p>	<p>The OCS Blue Verifier can:</p> <ul style="list-style-type: none"> <li>Request evidence that the process and status of incident investigations and corrective action is reviewed periodically for completion and effectiveness.</li> </ul>
<p>E. Are resin loss prevention checklists and/or procedures updated as needed to drive continual improvement and incorporate learnings?</p>	<p>The OCS Blue Verifier can:</p> <ul style="list-style-type: none"> <li>Request evidence that a learning from the investigation and corrective action process has been incorporated into a resin loss prevention checklist and/or procedure.</li> </ul>
<p>F. Has performance related to plastic resin loss been incorporated into periodic, internal EHSQ Management reviews or similar corporate position?</p>	<p>The OCS Blue Verifier can:</p> <ul style="list-style-type: none"> <li>Request evidence that performance related to plastic resin loss has been incorporated into periodic, internal EHSQ Management reviews or similar corporate position.</li> </ul>
<p>G. Have all required OCS Blue Metrics been reported to the OCS Program during each required reporting cycle?</p>	<p>The OCS Blue Verifier can:</p> <ul style="list-style-type: none"> <li>Request evidence that all required OCS Blue Metrics have been reported to the OCS Program during each required reporting cycle.</li> </ul>

### 3. Provide Employee Training and Accountability for Spill Prevention, Containment, Clean-Up, and Disposal

A. Develop dedicated OCS training or integrate OCS into existing training for employees and contractors. Training must include:

- Objectives of OCS.
- Applicability of OCS to individual's job.
- Procedures to prevent and mitigate resin loss.

B. Conduct OCS training with all employees and contractors during initial on-boarding and at least annually thereafter.

C. Display the OCS Blue plaque or certificate in a public area within the facility. Public areas may include but are not limited to a conference room, lobby or entry area, or trophy case.

D. Display posters related to preventing or mitigating resin loss in areas where plastic resin is being handled within the facility.

E. Incorporate OCS into periodic operational meetings to review OCS prevention and mitigation strategies and address any recent incidents of resin loss.

F. Incorporate OCS into periodic EHS meetings to review performance related to resin loss and consider opportunities for continual improvement.

G. Engage employees to increase awareness and commitment to preventing resin loss.

H. Share OCS Blue Metrics reported to the OCS Program with employees at least once annually, either at the company or facility level.

I. Create a method for employees and contractors to identify risk areas and suggest resin loss prevention strategies.

#### OCS Blue Verifier Checklist

#### Guidance

A. Has dedicated OCS training been developed or has OCS been integrated into existing training for employees and contractors? (All required components included.)

The OCS Blue Verifier can:

- Request a copy of the dedicated OCS training or the training in which OCS has been integrated. (All required components included.)

<p>B. Is OCS training conducted with all employees and contractors during initial on-boarding and at least annually thereafter?</p>	<p>The OCS Blue Verifier can:</p> <ul style="list-style-type: none"> <li>Request evidence that OCS training has been conducted with all employees and contractors during initial on-boarding.</li> <li>Request evidence that OCS training has been conducted with all employees and contractors at least once per year on an ongoing basis.</li> </ul>
<p>C. Is the OCS Blue plaque or certificate displayed in a public area within the facility?</p>	<p>The OCS Blue Verifier can:</p> <ul style="list-style-type: none"> <li>Conduct a visual inspection to confirm that the OCS Blue plaque or certificate is displayed in a public area within the facility.</li> </ul>
<p>D. Are posters related to preventing or mitigating resin loss present in areas where plastic resin is being handled within the facility?</p>	<p>The OCS Blue Verifier can:</p> <ul style="list-style-type: none"> <li>Conduct a visual inspection to confirm that posters related to preventing or mitigating resin loss are present in areas where plastic resin is being handled within the facility.</li> </ul>
<p>E. Is OCS incorporated into periodic operational meetings to review OCS prevention and mitigation strategies and address any recent incidents of resin loss?</p>	<p>The OCS Blue Verifier can:</p> <ul style="list-style-type: none"> <li>Request agendas and/or meeting minutes for periodic operational meetings that include the review of OCS prevention and mitigation strategies and address any recent incidents of resin loss.</li> </ul>
<p>F. Is OCS incorporated into periodic EHS meetings to review performance related to resin loss and consider opportunities for continual improvement?</p>	<p>The OCS Blue Verifier can:</p> <ul style="list-style-type: none"> <li>Request agendas and/or meeting minutes for periodic EHS meetings that include the review of performance related to resin loss and consider opportunities for improvement.</li> </ul>
<p>G. Have employees been engaged to increase awareness and commitment to preventing resin loss?</p>	<p>The OCS Blue Verifier can:</p> <ul style="list-style-type: none"> <li>Request evidence of employee engagement initiative, which may include the OCS Employee Pledge.</li> </ul>
<p>H. Are OCS Blue Metrics that are reported to the OCS Program shared with employees at least once annually, either at the company or facility level?</p>	<p>The OCS Blue Verifier can:</p> <ul style="list-style-type: none"> <li>Request evidence that the OCS Blue Metrics that are reported to the OCS Program are shared with employees at least once annually, either at the company or facility level.</li> </ul>
<p>I. Has a method been created for employees and contractors to identify risk areas and suggest resin loss prevention strategies?</p>	<p>The OCS Blue Verifier can:</p> <ul style="list-style-type: none"> <li>Request evidence that a method has been created for employees and contractors to identify risk areas and suggest resin loss prevention strategies.</li> </ul>

## 4. Audit OCS Blue Management Practices Regularly

A. Incorporate OCS management practices into EHSQ internal audit process that occur in a defined frequency.

B. Complete EHSQ internal audit process at defined frequencies.

C. Incorporate OCS related performance into periodic, internal EHSQ Management Reviews.

OCS Blue Verifier Checklist	Guidance
<p>A. Have OCS management practices been incorporated into EHSQ internal audit processes that occur in a defined frequency?</p>	<p>The OCS Blue Verifier can:</p> <ul style="list-style-type: none"> <li>Request evidence that OCS management practices have been incorporated into EHSQ internal audit processes that occur in a defined frequency.</li> </ul>
<p>B. Have internal EHSQ audits been completed at defined frequencies?</p>	<p>The OCS Blue Verifier can:</p> <ul style="list-style-type: none"> <li>Request documentation of completed internal EHSQ audits.</li> </ul>
<p>C. Has OCS related performance been incorporated into periodic, internal EHSQ Management Reviews?</p>	<p>The OCS Blue Verifier can:</p> <ul style="list-style-type: none"> <li>Request evidence that OCS related performance has been incorporated into periodic, internal EHSQ Management Reviews.</li> </ul>



## 5. Encourage Partners to Prevent Resin Loss and Join OCS or OCS Blue

- A. Promote OCS and/or OCS Blue with supply chain partners to help them understand the importance of preventing resin loss.
- B. Create a process to notify supply chain partners if a plastic resin loss incident occurs that is reportable in OCS Blue data reporting.
- C. Create a process to receive notification from a supply chain partner if a plastic resin loss incident occurs.
- D. Participate in an OCS event, an OCS webinar, and/or contribute a case study on the company or facility's experience preventing and mitigating plastic resin loss to the OCS Program for use in a resource.

OCS Blue Verifier Checklist	Guidance
<p>A. Is OCS and/or OCS Blue promoted with supply chain partners to help them understand the importance of preventing resin loss?</p>	<p>The OCS Blue Verifier can:</p> <ul style="list-style-type: none"> <li>• Request evidence that information on OCS and/or OCS Blue has been promoted with supply chain partners.</li> </ul>
<p>B. Has a process been created to notify supply chain partners if a plastic resin loss incident occurs that is reportable in OCS Blue data reporting?</p>	<p>The OCS Blue Verifier can:</p> <ul style="list-style-type: none"> <li>• Request evidence that a process has been created to notify supply chain partners if a plastic resin loss incident occurs that is reportable in OCS Blue data reporting.</li> </ul>
<p>C. Has a process been created to receive notification from a supply chain partner if a plastic resin loss incident occurs?</p>	<p>The OCS Blue Verifier can:</p> <ul style="list-style-type: none"> <li>• Request evidence that a process has been created to receive notification from a supply chain partner if a plastic resin loss incident occurs.</li> </ul>
<p>D. Has the company participated in an OCS event, an OCS webinar, and/or contributed a case study on preventing or mitigating plastic resin loss to the OCS program for use in a resource?</p>	<p>The OCS Blue Verifier can:</p> <ul style="list-style-type: none"> <li>• Request evidence that the company has participated in an OCS event, an OCS webinar, and/or contributed a case study on preventing or mitigating plastic resin loss to the OCS program for use in a resource.</li> </ul>