

OCEAN BOUND PLASTIC

CERTIFICATION PROGRAM

REMOTE AND SUPERVISED/SHADOW AUDITS GUIDELINES



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Revisions and Updates

This document shall be revised as required in particular to adapt to the evolutions of some of the Exceptional Conditions mentioned in this document.

Please send any comment you have regarding this document to [contact\(at\)obpcert.org](mailto:contact(at)obpcert.org).

Revision history

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1. FOREWORDS

The aim of Zero Plastic Oceans is to protect oceans from the continuous leakage of plastic waste from land-based activity by developing incentives and models that promote the collection of Ocean Bound Plastic¹ (OBP).

The **OBP Certification Program** was designed to encourage the removal of OBP from the environment by adding value in effectively collecting and treating it before it reaches oceans. The scheme is composed of two subprograms; the **OBP Recycling Subprogram**, and the **OBP Neutrality Subprogram**.

When OBP is commercially recyclable², its collection and recycling can be encouraged by certifying its origin and traceability, giving it a higher market value. This model is certified using the OBP Collection Organization standard and the OBP Recycling Organization standard, for the OBP Recycling Subprogram.

When OBP is not commercially recyclable³, its collection and final treatment can be encouraged by certifying this process through the Ocean Bound Plastic Neutrality model. In this model, plastic producers or users offset the plastic consumption of a selected scope of production, by removing an equivalent volume from the environment through the acquisition of OBP Neutralization Certificates. This model is certified using the OBP Neutralization Services Provider standard and the OBP Plastic Producers & Users standard, for the OBP Neutrality Subprogram.

Organizations may certify themselves for one, or both subprograms as they are complementary solutions. Working with both subprograms makes sense in terms of economical efficiency, given all OBP is collected and marketed at once. It also makes sense from the environmental perspective, since it is only by addressing both, commercially and non-commercially recyclable OBP, that we will be able to make a real impact.

¹ Ocean Bound Plastic, is, as defined in section 2, plastic litter that will be carried away to oceans in particular by the effects of currents, winds, river flows or tides.

² Commercially recyclable means that OBP is technically recyclable and that it can be sold locally to recyclers for a price that renders its collection attractive to waste pickers or collection organizations. Currently, especially in countries where OBP is leaking into the oceans, a significant portion of technically recyclable OBP is unfortunately not commercially recyclable.

³ Not commercially recyclable means that OBP cannot be sold for an attractive price but also includes products or packaging which are technically not recyclable (because of the resin used, the mix of different materials or because they are too damaged).



2. TERMS AND DEFINITIONS

Below definitions specific to this document, for other definitions please refer to the appropriate Standard.

Exceptional Conditions⁴:	Circumstances that render the performance of on-site audits impossible or undesirable due to travel prohibitions, restrictions, or safety reasons. Such circumstances typically include wars, insurrections, natural disasters, notably insecure areas, pandemics, etc.
Remote Audit	Adapted from ISO 19011: Remote Audit refer to the use of ICT (information and communication technologies) to gather information, interview an auditee, etc., when “face-to-face or on-site” methods are not possible or desired.
Supervised/Shadow Audit	Audit realized face-to-face by an auditor that is not qualified for the OBP Program, supervised remotely by an Auditor who is qualified for the OBP Program.
Trader	An Organization that does not take any physical ownership of a good and solely purchases and sells that good to other parties. Traders are not involved in any physical transformation, repackaging, or relabeling of the good.

⁴ *If in doubt Certification Bodies should enquire to ZPO if a given circumstance shall be or not considered an Exceptional Condition.*

3. SCOPE

This document covers the circumstances in which Remote or Supervised/Shadow Audits may be carried out by ZPO Approved Certification Bodies in replacement of on-site Audits, if agreed between them and the certification applicant Organizations. It gives mandatory guidance to Approved Certification Bodies on whether or not Remote Audits or Supervised/Shadow Audits are permitted and under which circumstances and conditions.

4. APPLICABLE DATE

The requirements included in these guidelines shall be applied by Certification Bodies in a maximum period of 2 months from the release date of this document.

5. REQUIREMENTS

5.1. REMOTE AND SUPERVISED/SHADOW AUDIT PROCEDURES

In order for Certification Bodies to be able to carry Remote or Supervised/Shadow Audits, they need to have developed Audit procedures for such types of Audits, and these need to be previously revised and approved by ZPO.

5.2. OBLIGATORY MENTION

Scope Certificates issued by Certification Bodies after Remote Audits need to include the specification that the Audit was done remotely.

5.3. REMOTE AUDITS

5.3.1. PURPOSE

Remote Audits allow Organizations to get certified, or remain certified, when Exceptional Conditions prevent them from receiving on-site Audits. Remote Audits require however full compliance to the applicable OBP Standard and do not imply a lesser compliance or verification level.

Remote Audits also allow Organizations whose Audits are classified as low risk per ANNEX I to benefit from reduced certification costs given there are no travel time and travel expenses associated when performing a Remote Audit.



5.3.2. LOW RISK LEVEL AUDITS

Remote Audits are authorized for low risk level Audits (as per ANNEX I) for Organizations who are already OBP certified, even when there are no Exceptional Conditions. This is only allowed for two consequent years after the initial on-site certification Audit has taken place in the first year. This means that in a continuous three-year certification cycle, the first Audit needs to be on-site, and the following two Audits can be remote, and this cycle shall be repeated.

If there are Exceptional Conditions at the time when the first on-site Audit is planned, the order of the three-year certification cycle can be altered. This means that it is possible to carry the first certification Audit as a Remote Audit, provided that in the second year, there is an on-site Audit carried out. In case in the second year, the site visit cannot be performed before the next certification cycle is due, the certification shall be suspended at the anniversary date, and will only be renewed after an on-site Audit is feasible and performed.

5.3.3. MEDIUM RISK LEVEL AUDITS

Remote Audits are authorized for Organizations whose Audits are classified as medium risk level Audits (as per ANNEX I) in the presence of Exceptional Conditions, even for initial certification Audits. After a Remote Audit has taken place, a certification decision can be taken, and a certificate can be issued. However, the certificate validity will be conditioned to the fact that an on-site visit focusing on the requirements of the standard that are less easily assessed remotely, is carried out within a maximum time frame of 2 months from termination of the Exceptional Condition.

If the site visit cannot be performed before the next certification cycle is due, the certification shall be suspended at the anniversary date, and will only be renewed after an on-site Audit is feasible and performed.

5.3.4. HIGH RISK LEVEL AUDITS

Remote Audits are not authorized for Organizations whose Audits are classified as high-risk level Audits (as per ANNEX I).



5.4. SUPERVISED/SHADOW AUDITS

5.4.1. PURPOSE

Supervised/Shadow Audits allow organizations to get certified in countries where approved Certification Bodies do not yet have local/national qualified OBP auditors due to the time required to roll out global auditor training. This possibility is allowed to encourage the collection of OBP from the environment through the growth of the number of OBP certified Organizations.

5.4.2. CONDITIONS

Supervised/Shadow Audits can be carried out by Certification Bodies, in agreement with the applicant Organization, when they do not have a local/national OBP approved auditor to carry out the on-site Audit. In that case, it is required that the local/national auditor available is qualified to audit other environmental or social standards that follow ISO 17065 accreditation.

The local/national auditor shall prepare and perform the Audit under remote guidance and supervision of the approved OBP auditor. Supervised/Shadow Audits are considered fully equivalent to an on-site Audit by a qualified auditor.

Supervised/Shadow Audits are permitted for all Approved Certification Bodies until the 8th of September 2022.

After this date, Supervised/Shadow Audits shall only be authorized for newly Approved Certification Bodies during one year from the date of approval.



6. ANNEX I - AUDIT RISK LEVEL ASSESSMENT

The following criteria are to be used by Certification Bodies when assessing the risk level of Audits for Organizations applying to one or several Standards of the OBP Program.

6.1. LOW RISK LEVEL

All Trader Audits for the OBP-REC-STD and OBP-PRO-STD shall be considered as low risk.

6.2. MEDIUM RISK LEVEL

Audits for Organizations complying with at least one of the following conditions shall be considered as medium risk.

CONDITION	DESCRIPTION OR THE CONDITION	APPLICABLE OBP STANDARD
Audit is a renewal Audit	Organization already holds a valid OBP Certificate, and no issues were raised during the current certification cycle.	All OBP Standards
Previously certified Organization to other social or environmental standard	Organizations already certified through on-site audits for other environmental or social standard in a maximum previous period of one year by the same Certification Body. The other considered standards should follow ISO 17065 accreditation. In case the Organization has subcontractors, it can only be considered medium risk if, subcontractor operations can be visited on-site.	OBP-REC-STD OBP-PRO-STD

6.3. HIGH RISK LEVEL

Cases not included above shall be considered as high risk level Audits. Certification Bodies may decide to classify as high risk level Audits some of the cases included above, if the Organization's behavior in previous certification cycles, or experience with other standards demonstrates that it is reasonable to do so.

