

# OCEAN BOUND PLASTIC

## CERTIFICATION PROGRAM

### OBP CERTIFICATION PROGRAM AUDIT PROTOCOLS



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## **Revisions and Updates**

This protocol will be revised if required, to incorporate improvements or clarifications that will not change substantially the content of the protocol and its requirements. Further significant revision schedule will be communicated on the OBP Program website. Please send any comment you have regarding the protocol to [contact\(at\)obpcert.org](mailto:contact(at)obpcert.org)

## **Revision history**

<b>Date</b>	<b>Version</b>	<b>Changes</b>
17 <sup>th</sup> Dec. 2021	V1	<ul style="list-style-type: none"><li>• All previous audit Protocols (OBP-COL-PRO, OBP-REC-PRO, OBP-NEU-PRO and OBP-PRO-PRO) have been merged into this new document.</li><li>• The previous annex I of the protocols, CB's personnel requirements has been updated and moved to the document OBP-CBA-GUI</li></ul>
8 <sup>th</sup> Mar. 2022	V1.1	<ul style="list-style-type: none"><li>• Inclusion of effective date (1.5)</li><li>• Adjusted delay in section 5 (5 days to 10 days)</li><li>• Rewriting of chapter 2, section 6.</li></ul>
24 <sup>th</sup> Jun. 2022	V1.2	<ul style="list-style-type: none"><li>• Addition of a new section 6 (Scope Certificate updates)</li></ul>
6 <sup>th</sup> Mar. 2023	V1.3	<ul style="list-style-type: none"><li>• Addition of sampling clarification for Independent Collectors working for Small Collectors, chapter 2.1</li><li>• Addition of the Independent Collectors lists in the minimum list of documents for Collection Organization and Neutralization Provider Standards, section 8.</li></ul>
8 <sup>th</sup> Sept. 2023	V1.4	<ul style="list-style-type: none"><li>• Adaptations and additions to include the Social+ OBP Component into the document in following chapters and sections: 1.3, 1.5 1.4, 2, 4, 7.</li><li>• Clarification on the need to include in Audit report the checklist for Multisite and Supplier Group options when applicable in section 5.</li><li>• Addition of a limit to add Small Collectors to a Supplier Group in section 6</li></ul>



		<ul style="list-style-type: none"> <li>• Addition of need to include NC closure process details in the final report in section 7.</li> <li>• Addition of minimum document list for Social+ OBP in chapter 8.</li> </ul>
31 <sup>st</sup> Mar. 2024	V1.5	<ul style="list-style-type: none"> <li>• Addition of a chapter 7 (Certification) and reordering of chapter 6 and 8 without any change to the content of the chapters.</li> <li>• Adaptation of additions to incorporate the Brand Standard in the following chapters: 1.3, 1.4, 1.5, 2, 4, 6, 9.</li> </ul>

## TABLE OF CONTENTS

<b>1. INTRODUCTION / SCOPE .....</b>	<b>5</b>
1.1. BACKGROUND INFORMATION .....	5
1.2. PURPOSE OF THIS DOCUMENT .....	6
1.3. SCOPE .....	6
1.4. NORMATIVE REFERENCE .....	6
1.5. EFFECTIVE DATE .....	7
1.6. DEFINITIONS .....	7
1.7. GUIDELINES AND AUDIT PROCESS .....	7
<b>2. PLANNING AN AUDIT .....</b>	<b>8</b>
2.1. DETERMINATION OF SAMPLE SIZE AND COMPOSITION .....	10
2.2. AUDIT PLAN .....	12
<b>3. PREPARING AN AUDIT .....</b>	<b>14</b>
3.1. INFORMATION SOURCES FOR DESK RESEARCH .....	14
<b>4. CARRYING OUT AN AUDIT .....</b>	<b>15</b>
4.1. INTERVIEWS .....	18
4.2. TRIANGULATION OF INFORMATION .....	19
4.3. CLOSING MEETING .....	20
<b>5. REPORTING AND COMPLETING AUDIT ASSESSMENT .....</b>	<b>21</b>
<b>6. EVALUATION OF NON-CONFORMITIES AND IMPACT ON AUDIT .....</b>	<b>21</b>
<b>7. CERTIFICATION .....</b>	<b>23</b>
<b>8. CHANGING THE SCOPE OF CERTIFIED ORGANIZATIONS .....</b>	<b>25</b>
<b>9. ANNEX I – MANDATORY DOCUMENTS TO BE PRESENTED .....</b>	<b>26</b>
<b>10. ANNEX II - AUDIT PLAN TEMPLATE .....</b>	<b>32</b>

# 1. INTRODUCTION / SCOPE

## 1.1. BACKGROUND INFORMATION

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 Plastic<sup>1</sup> (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 recyclable<sup>2</sup>, its collection and Recycling can be encouraged by certifying its origin and traceability, giving it a higher market value with the OBP Recycling Subprogram. This chain of custody is certified using the OBP Collection Organization Standard, the OBP Recycling Organization Standard and the OBP Brand Standard depending on which step on the chain an organization is.

When OBP is not commercially recyclable<sup>3</sup>, its collection and final treatment can be encouraged by certifying the process with the OBP Neutrality Subprogram. In this model, Plastic producers or users can contribute to a better environment by removing a determined volume of plastic waste from nature through the acquisition of OBP Credits. This model is certified using the OBP Neutralization Services Provider Standard and the OBP Plastic Producers & Users Standard.

Organizations may certify themselves for one or both subprograms as they are complementary solutions. Working with both subprograms makes sense in terms of economic 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.

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<sup>1</sup> Ocean Bound Plastic, is, as defined in OBP-DEF-GUI, Plastic litter that will be carried away to oceans in particular by the effects of currents, winds, river flows or tides.

<sup>2</sup> Commercially recyclable OBP as defined in OBP-DEF-GUI, 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.

<sup>3</sup> Not commercially recyclable OBP as defined in OBP-DEF-GUI, 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).

Organizations collecting OBP willing to provide enhanced social benefits to their employees and informal collectors (Independent Collectors), may additionally certify to the Social+ OBP Component.

## **1.2. PURPOSE OF THIS DOCUMENT**

This document serves as a guide for Certification Bodies – CBs, carrying out third party Audit assessments for ZPO. All requirements related to the Audits are explained to ensure consistent performance of the different independent Auditors. During each Audit assessment, the full scope of the applicable OBP Standard is checked for compliance. The results of the Audit assessment are reported.

## **1.3. SCOPE**

This Audit protocol provides guidance and structure for the execution of independent third-party Audits against all 5 of the certification Standards, and the Social+ OBP Component of the OBP Program. There are 3 Standards making up the Recycling subprogram; the Collection Organization Standard, the Recycling Organization Standard and the Brand Standard, and the Social+ OBP Component that can be used if desired along with the Collection Organization Standard. There are 2 Standards making up the Neutrality subprogram, the Neutralization Services Provider Standard, and the Plastic Producers and Users Standard, and the Social+ OBP Component that can be used if desired along with the Neutralization Services Provider Standard.

As part of the closing meeting report between the Auditor and the client Organization, Auditors should be able to state whether the Organization complies or not, with all necessary requirements to be certified against the applicable Standard of the Ocean Bound Plastic Certification Program. In case the Organization does not comply yet with all requirements needed, the report should include the specific requirements which need further implementation work before the Scope Certificate can be granted to the Organization.

## **1.4. NORMATIVE REFERENCE**

- OBP-COL-STD: OBP Collection Organization Standard
- OBP-REC-STD: OBP Recycling Organization Standard
- OBP-NEU-STD: OBP Neutralization Services Provider Standard
- OBP-PRO-STD: OBP Plastic Producer and User Standard
- OBP-BRA-STD: OBP Brand Standard
- OBP-DEF-GUI: OBP Program Definitions & Annexes
- OBP-TEM-GUI: OBP Program Templates
- OBP-LOG-GUI: OBP Logo Uses and Claims Guidelines
- OBP-FAQ-GUI: OBP Frequently Asked Questions
- OBP-REM-GUI: OBP Remote and Supervised/Shadow Audit Guidelines



- OBP-ROS-GUI: OBP Recognition of other Standards and Audits
- OBP-FEE-CON: OBP Fees Structure
- OBP-CBA-GUI: OBP Certification Body Approval Guidelines
- OBP-CPM-PRO: OBP Certification Program Manual Content Outline for Certification Bodies
- OBP-SOC-STD: Social+ Ocean Bound Plastic Component
- OBP-SOC-GUI: Social+ Ocean Bound Plastic Component Implementation Guidelines

## 1.5. EFFECTIVE DATE

This document becomes effective on the release date and shall become compulsory to use on the 30<sup>th</sup> of June 2024.

## 1.6. DEFINITIONS

Capital letters are used throughout the document to signal the words that are included in the definitions available in OBP-DEF-GUI. Acronym's significance is also available in the same OBP-DEF-GUI document.

## 1.7. GUIDELINES AND AUDIT PROCESS

When an Organization wishes to make a Claim about its status as an OBP certificate holder they need to comply with the relevant applicable Standard(s) they wish to certify themselves with and select an Approved Certification Body – CB for the Auditing and certification services.

The contact person from the Organization should plan the Audit in collaboration and alignment with the Auditor through an Audit plan. The contact person in the Organization should be the person in charge of the Standard implementation within its Organization, usually quality coordinators. Prior to the on-site Audit, the Auditor must determine the assessment sample as per section 2.1 and ensure the quality coordinator is aware of all documents required to be available during the Audit. When the preparation and planning have been completed, the Audit assessment can be performed. After completion of the Audit and closing meeting, a final report, approved by the certifier of the CB, will be shared with the Organization and ZPO.

Approved Certification Bodies should follow information available in the OBP-CBA-GUI document to select adequate Auditors and certifiers for this certification scheme within their staff.

## 2. PLANNING AN AUDIT

The first step of the planning process of an Audit, is for the Approved CB to select an adequate, qualified Auditor(s), available for the potential proposed Audit dates. Specific education, knowledge, skills, and experience for Auditors for the OBP certification scheme are specified in the OBP-GBA-GUI. An additional requirement can be language (Auditors should preferably speak the same language as the Organization staff; however, where necessary, a translator can be used). Ideally, CBs should try to have one available Auditor for an entire region or country to streamline and ease training of Auditors around OBP certification scheme. The Auditor should have undergone an internal CB OBP Audit training before planning the Audit.

In the planning phase the selected Auditor must inform the contact person/quality coordinator of the Organization about the Audit process. The Auditor should request the following general information necessary to plan the Audit assessment:

- Organization location and travel time from nearest airport/city to get there.
- Proposed site or sites for Audit.
- Scope of Audit and applicable Supply Chain Model.
- List of Subcontractors if any and their location and description of Subcontracted Processes.
- Languages used by the Organization.
- Any security or health and safety risks.
- In case the Organization is already certified, the Auditor should check whether there are any changes with the information in the last certification report.
- Compare/confirm received information with information in application form of Organization. In case there are substantial differences that affect audit time, the certifier should be informed in case a new quotation is needed.

The Auditor should also request the following specific additional information:

### **For the OBP Collection Organization Standard:**

- Collection model carried out by the Organization
- Group Supplier Certification applicable or not
- All collection sites, and proposed collection sites to be audited

### **For the OBP Recycling Organization Standard:**

- Recycling activity carried out by the organization (for example: concentration, trading, preprocessing, transformation, final material or product manufacturing, packaging).



### **For the Brand Standard**

- Scope of products covered by the OBP Promotional Claims
- Central OBP office location

### **For the Neutralization Services Provider Standard:**

- Collection model carried out by the Organization.
- Group Supplier Certification applicable or not.
- All collection sites, and proposed collection sites to be audited.
- Approved Treatment model applied to collected Non-Recyclable OBP (disposal, valorization, Recycling).
- Proposed sites for Approved Treatment.
- List of third parties used for Approved Treatment.

### **For the OBP Plastic Producer and Users Standard:**

- Activity carried out by the organization.
- Definition of the OBP Neutral/Positive Production Scope and associated plastic volumes used for its production.
- List of production sites (for the OBP Scope).
- List of Neutralization services provider(s), or ZPO registered OBP Credit trader with whom the Organization has a Contract.

### **For the Social+ OBP Component:**

- The specific scope of Social+ OBP compared to the OBP scope of the Organization in cases where both categories are collected.
- Community Manager(s) contact details.

After the initial contact, the Auditor should determine if the information provided is sufficient to develop an Audit plan. If the information is not sufficient the Auditor must reach out the quality coordinator again and request missing information. There is no specific time requirement for the Audit duration, it is subject to various criteria and therefore difficult to prescribe. Criteria that impact (increase or decrease) the Audit length could include:

- Size of the Organization (number of employees/suppliers or associated staff or volunteers).
- Location of site(s) and number of sites to audit.
- Collection model/ Type of recycling activity/ Final treatment/ Complexity of Production scope and Supply Chain Model.
- Complexity of the treatment logistics (number of third parties, sites...).
- Whether it is a Group Supplier Certification and its size.
- If the Organization is applying for a Multisite Certification or not.

- Requirement to visit (due to risk assessment) one or more Subcontractors and location in relation to the Organization's location.
- If the Organization is applying for the Social+ OBP Component or not.
- How prepared the Organization is.

In general, half a day should be sufficient to conduct the Audit at the Organization's office, and additional time/days to visit sites and/or proceed with interview will be needed depending on the above-mentioned criteria and sample size. For the OBP Plastic Producer and User Standard, it is expected however that the Audit should last between half a day to a complete day for most cases. For the OBP Brand Standard, it is expected that the Audit should last half a day and can be carried out virtually.

## 2.1. DETERMINATION OF SAMPLE SIZE AND COMPOSITION

To verify compliance with the OBP certification Standards, it is not always necessary that all parts of the Organization are audited. Sampling is applicable within each of the following categories of the Organization (when applicable to each specific Standard), depending on its structure, activity, and certification type:

- Independent Collectors (both when selling to the Organization directly or to Small Collectors in a Supplier Group)
- Active<sup>4</sup> Collection sites
- Storage and processing sites
- Small Collectors
- Sites for a Multisite Certification
- Subcontractor operations
- Approved Treatment facilities

For the Subcontractors' category only, the total number will be first analyzed through a risk analysis based on the criteria indicated in the relevant certification Standard. The resulting Subcontractor group considered to present a high risk will then be sampled using the square root methodology.

The sample size for sites to be audited (how many) for each of the above categories of an Organization will be based on the square root of the total number rounded upwards to the following integer.

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<sup>4</sup> Only sites where an active collection is taking place should be sampled. For Organizations that collect to new sites every time (this is frequent for beach clean-ups) the Audit should take place when at least one clean-up takes place so the operations can be verified.

For example, if the Organization has 40 Subcontractors out of which 25 present at least one of the risk factors indicated in the Standard, the number of Subcontractors that will need to be visited will be 5.

Another example, if the organization has 25 independent collectors, the number of independent collectors that will need to be interviewed will be 5.

Once the sample size (how many) to be audited has been determined, the following step is to select the composition of sample that will be audited (which). 25% of the determined sample shall be selected randomly (always rounding upwards to the following integer). The remainder of the sample will be non-random, and specifically chosen to cover the greatest variety of cases.

In the same case as the example above, where the sample size is 5, 25% of 5 (1.25, rounding up to 2), will be chosen randomly from the list of the 25 independent collectors. The remainder of the sample (3), will be chosen to ensure variety.

A non-exhaustive list of factors that shall be considered (adapting them to the part of the Organization concerned) to increase the variety are the following:

- Collection site ecosystem and location (mangrove, beach, riverbanks, wild area, urbanized area, etc.).
- Type of Collection practice (events with volunteers, permanent regular collection with permanent staff, purchasing from independent collectors or small collectors, etc.).
- Collection method (using river booms, nets or hand picking on riverbanks or beaches, using mechanized equipment, etc.).
- Size of Small Collector/sites/Subcontractor operations/Approved Treatment facilities.
- Activity performed by the different sites, Subcontractors, Approved Treatment facilities.
- Type of OBP categories being collected/managed/treated.
- Frequency/strength of relation between Organization and Independent Collectors/Approved Treatment facility/Subcontractors.
- Internal Audits results.
- Geographic dispersion.
- Important changes since last Audit.
- Entity/site/person previously audited/interviewed or not.

The sample size is the square root of the total number of sites/entities/people (applicable from 3 and beyond), rounded up as follows:

Number to be sampled	Sample size	Number to be selected randomly
3	2	1
4	2	1
5	3	1
10	4	1
25	5	2
50	8	2
1000	32	8

Considering that for some Organizations the application of the square root methodology may result in a sample size that is too large making the Audit too long without bringing additional value to the Auditor, the following maximum sample size limit will be applied:

- Interviews with Independent Collectors: 32 interviews
- Collection sites: 5 sites
- Storage and processing sites: 5 sites
- Small Collectors operations: 6 Small Collectors
- Sites for a Multisite Certification: 6 sites
- Subcontractors operations: 6 Subcontractors
- Approved Treatment facilities: 6 facilities

The Auditor is allowed to increase this sample size during Audit only in cases where non-conformities are reasonably suspected, and that further interviews or visits are necessary to confirm the possible non-conformities.

## 2.2. AUDIT PLAN

An Audit plan set in a written format should be prepared by the Auditor. An example of an Audit plan template document and factors that need to be included is found in Annex II of this document. The Audit plan should ideally be developed in the local language of the Organization. The Auditor should get approval by the CBs certifier at least two weeks before the planned Audit date and send it to the Organization at least ten days prior to the Audit (the earlier the better).

The Audit plan should emphasize on: 1) Name of Auditor who will be attending, 2) Planned Audit date, 3) Name of contact person/quality coordinator of the Organization who will attend the Auditor, 4) Relation of documents that will be required and 5) locations and access requirements. The purpose of this plan is to provide the Organization with all the details of the process and inform them on the planning, scope and objectives of the Audit.

In situations where a visit to the site(s) is not possible due to force majeure (e.g. illness, death of family member, flooding, earthquake or other natural disasters, war, crime,

etc.), an alternative site should be selected to meet the required sample size (when sampling applies). If only one site was to be Audited or the sample size cannot be met, the Audit shall be adjourned to a later date at which the force majeure condition is resolved.

The plan should cover or refer to the following:

- Audit scope: Activity, products, and location of Organization.
- List of specific document requirements.
- Locations, dates, expected time and duration of Audit assessment activities to be conducted, including meetings with the Organization coordinator.
- Specification of the Organization representative that will be the contact person during the Audit with the Auditor.
- Specification of number of sites (Supplier Group Members, Local sites in a Multisite certification, Subcontractors, Approved Treatment facilities, collection sites) to be visited number of Independent Collectors - ICs to be interviewed.
- Roles and responsibilities of the Auditor, as well as guides and observers, name and contact information of the Auditor that will be visiting the Organization.
- Working and reporting language.
- Any specific measures to be taken to address the effect of uncertainty on achieving the Audit objectives.
- Confidentiality and information security.
- Follow-up actions from a previous Audit (if applicable).
- Process of sharing the results with the Organization. Preliminary results will be shared with the coordinator in the closing meeting of the Audit visit. The final results will be shared after a review by the certifier of the Audit report.
- Process of public registering the Organization as a certificate holder on ZPO website once the Scope Certificate - SC is issued.

Note: It is recommended to keep the number of observers attending the Audit to a minimum, to ensure the coordinator from the Organization is not uncomfortable or intimidated.

## 3. PREPARING AN AUDIT

The Ocean Bound Plastic scheme from ZPO is a global program which is designed to be applicable globally, while respecting local regulations, local customs, and possibilities. This Audit protocol is applicable to all OBP certification Standard Audits in combination with local documents to ensure Audits are executed with consistency throughout all markets, whilst remaining relevant to the local context.

### 3.1. INFORMATION SOURCES FOR DESK RESEARCH

Only reliable sources should be used to obtain the required information, such as:

- Published laws.
- Internet (only reliable sources such as websites of governmental Organizations, information with academic references etc.).
- Information from the quality coordinator and administrative staff or relevant staff for the subject.
- Relevant certification standards.

Other types of sources are permitted if reliability can be proven. All localization of legal related practices must be legally reviewed locally.

For information beyond the legal realm, the Auditor should research local practice, using reliable sources. Where local documentation does not exist, the Auditor and the quality coordinator should agree on the local interpretation.

## 4. CARRYING OUT AN AUDIT

The general Audit process for all OBP certification Standards consists of the indicative steps shown in the overview below.

Opening meeting according to ISO 19011

- Introduction of Auditor.
- Explanation of Audit process (incl. time/ documents needed).
- Statement of confidentiality of information.

Organization legal compliance, management system (not applicable for OBP-BRA-STD)

- Legal documentation, permits.
- Fair working conditions, No child Labor, minimum wages.
- Management system review.
- If applicable review of Multisite specific requirements.

Waste Management (not applicable for OBP-BRA-STD)

- Review waste management procedures and systems implemented in the Organization.
- Review evidence of correct disposition of plastic waste in particular.

Claims and brandmark usage

- Review compliance with Claim requirements, of the Standard and the OBP Logos Uses and Claims Guidelines.

Interviews (throughout the Audit)

- Interview with Organization's staff as relevant (purchases, sales, quality coordinator, processing coordinator, marketing, etc.).
- Interview independent collectors, subcontractors, supplier group member staff as relevant.

Closing meeting according ISO 19011

- Explain any discrepancies found.

Specific additional indicative steps relevant to each certification standard are shown below.

### **OBP Collection Organization Standard and OBP Neutralization Services Provider Standard**

Collection Sites and volumes/weights (supervised collection)

- Verify sites conformity with the program objectives.

#### Collection methodology and traceability

- Understand methods of plastic collection.
- Review documentation, training logs, interviews to ensure collectors compliance with the OBP standards.
- Review data collection for monitoring and traceability and compliance with Supply Chain Model -SCM.

#### Purchasing Structure (Independent Collector or Supplier Group)

- Review supply chain conformity with SCM, purchase agreements, sellers documentation.
- If applicable review supplier group management, procedure, documentations...

#### Collected Plastic Management

- Review cleaning, separation, weighting, and volume measurement procedures.
- Visit Subcontractor sites if required.
- Review reuse, recycle, sale or final disposal routes and associated Necessary Documentary Evidence to ensure full traceability.

#### Sale and dispatch of recyclable/recycled OBP

- Review procedures and documentation, control Claims and labeling samples.

### **OBP Recycling Organization Standard**

#### Purchases

- Review of conformity with Supply Chain Model -SCM.
- Certified supplier list and documentation.
- Purchased weights and invoices.

#### Organization's Processing site (s) & possible Subcontractors

- Review production management system and procedures compliance with SCM.
- Review of documentation, logs, mass balance system, etc.

#### Sales and Dispatch of OBP Output

- Review procedures and documentation, control claims and labeling samples.

### **OBP Neutralization Services Provider Standard**

#### Sale or Approved Treatment of collected OBP



- Review the Approved Treatment routes. Review if some sales of Commercially Recyclable OBP are also made and ensure corresponding weights are excluded from the Neutralization Certificates/OBP Credits issuance.
- Visit the Approved Treatment facility to ensure conformance with the 4 basic conditions of what OBP considers an “Approved Treatment”, and to validate the self-declaration document signed by the Approved Treatment facility.
- Review associated Necessary Documentary Evidence to ensure full traceability and compliance of environmental requirements (environmental licenses) on the whole treatment chain.

#### Neutralization Certificates/OBP Credits emission

- Review procedures, documentation and Neutralization Certificates and OBP Credits registering, control associated Claims.
- Neutralization Certificates/OBP Credits emission.

### **OBP Plastic Producer and Users Standard**

#### Organization's Production site (s) & possible Subcontractor(s)

- Review production system coherence with Ocean Bound Plastic Neutral/Positive Scope definition.
- Review evidence of Plastic usage and losses associated with the OBPN Scope.
- Review Subcontractors' documentation.

#### Neutralization/Offsetting

- Review of Contracts with Neutralization services providers or ZPO registered OBP Credit traders.
- Review Neutralization services providers SC and Neutralization Certificates purchased if applicable.
- Review mass balances.

### **Social+ OBP Component**

Social requirements of the OBP-COL-STD and OBP-NEU-STD are not revised and replaced with the specific requirements of the Social+ OBP Component.

#### Requirements for Independent Collectors

- Review IC community managers' team composition and coherence with the community managed and associated documentation. Ensure ICs are aware of benefits available.
- Review findings on the concerned community, child protection measures, monitoring and improvement processes of specific cases.

- Review OHS policies and procedures, verify means used to incentivize IC community to follow the recommendations, check health support and solutions provided.
- Review the type of administrative and financial support provided on-demand, and documentation/contracts available when applicable.
- Review workshop activities, and ICs awareness of them.
- Review payment mechanisms, prices, and premiums are correctly applied.

#### Requirements for other employees

- Verify the Organization is including all employees as defined in the Standard.
- Review implementation of the ETI base code in the Organization.

#### Supplier Group

- If the Organization uses a Supplier Group ensure that requirements applicable to both IC and employees are also applied at Small Collectors level, and that the Organization has put sufficient means to control and drive this.

#### Supply Chain Management

- Ensure if OBP is managed alongside Social+ OBP that both are properly managed according to the Supply Chain Model chosen requirements.

#### Progressive compliance

- For the first Audit only, evaluate the compliance level of the requirements for which progressive compliance is allowed. After the first year all requirements shall be 100% complied with.

### **OBP Brand Standard**

#### OBP product, certification claim and central office scope.

- Review coherence of the scope, intended claims and central office compliance to the requirements.

#### Suppliers and volume control

- Review supplier list and volumes to evaluate coherence with the proposed or realized claims.

## **4.1. INTERVIEWS**

The interview process is to assess current practices on the Organization and understand to what extent the documented practices have been implemented. The interviews could be conducted with the coordinator, workers, subcontractors providing labor services, the volunteer, etc. It is not necessary to interview all these individuals to establish Audit. The Auditor should attempt to establish which interviews will be conducted during the on-site Audit as part of the preparation phase of the Audit process.

An informal approach to interviews is advisable. The Auditor shall ask open ended questions during the interview starting with “what”, “where”, “how”, “when”. Questions beginning with “why” should be avoided as much as possible as it could be perceived confrontational.

The Auditor shall not suggest or condemn any practices during the Audit or ask any leading questions. The only objective of the interview should be to gather objective evidence of compliance.

The questions during the interviews should be relevant and appropriate to the tasks performed by the person being interviewed. No questions outside the scope of Audit shall be asked.

Interviews with all worker types shall always be carried out with the consent of the coordinator. During the workers interview the Auditor shall ensure that the coordinator is at a “sufficient physical distance” from the interview so that there is no undue pressure on the worker giving the interview.

The Auditor should always explain the reason for the interview and frequent note writing during interviews should be avoided as the interviewee could get intimidated. When the interview is finished, the results should be summarized and reviewed with the interviewed person. Names of interviewees and/or positions should be included in the report.

## **4.2. TRIANGULATION OF INFORMATION**

Only information that is Auditable should be accepted as Audit evidence and recorded accordingly. Interview and observation are key aspects of the Audit. The presence of documentation alone is not sufficient to demonstrate that a practice is in-place nor is the absence of documentation sufficient to indicate that the practice has not been implemented. This must be determined by the Auditor through an effective interview and observation process.

It is important to sufficiently cross reference the different sources to determine compliance with the specific OBP certification Standard requirements being assessed.

In case of interview, credible interviewing techniques should be practiced. The interviewer should be given the opportunity, in relation to non-conformances identified, to come with additional evidence in case they do not agree with the preliminary conclusions. If the interviewed person disputes any of the findings of the Auditor after discussion, the Auditor should notify the quality coordinator of the Organization. Evidence should be of such quality and quantity that qualified Auditors working independently would reach similar findings after evaluating the same evidence. The interpretation document should be used for reference to achieve this.

### 4.3. CLOSING MEETING

A closing meeting shall be performed at the end of each Audit. During the closing meeting the Auditor shall share a summary of the preliminary results and in case of non-conformities, an overview and explanation of these shall be presented in such a manner that they are understood and acknowledged by the Organizations' representative.

The final Audit report is delivered later to the Organization, after a review by the CB's certifier.

The meeting is chaired by the Auditor and the Organization's primary contact person(s) should be present.

The following shall be explained and discussed in the closing meeting:

- Audit evidence is based on a sample and thus a certain degree of uncertainty based on the findings.
- Results are not final until a post-assessment quality review is completed by the Auditor and revised by the CB's certifier.
- The Audit objectives, scope and OBP Standard requirements.
- All identified non-conformities, required follow-up activities and deadlines to carry them out.
- Any observations or recommendations.
- Any relevant post-Audit activities including receiving feedback from the Organization's coordinator on the results of the assessment.
- Comments and/or questions from the coordinator.
- Auditors will not provide consultancy or any feedback, besides the decision of accepting or not the evidence.

The Auditor should leave a signed summary of the preliminary identified non-conformities. In case the Organizations' representative does not acknowledge some of the identified non-conformities by the Auditor, the Auditor should recommend the Organization to get in touch with the CBs' certifier.

## 5. REPORTING AND COMPLETING AUDIT ASSESSMENT

The Auditor will send to the CBs' certifier, within a maximum of 10 working days after Audit date, the Audit report with all Audit findings. In this report, the results of all on-site Audits should be aggregated. In case the Audit was multisite, or included a supplier group, the specific checklist for these requirements need to be included in the report (these specific requirements can be found in the OBP-DEF-GUI document). The Auditor should also include a list of the non-conformities found.

For reporting, both conformity and non-conformity for each specific requirement should be specified, mentioning the names/types of sufficient evidence that was provided and reviewed to determine such results. The report should be clear enough on what was Audited, to enable recollection of evidence in case of the results are being disputed.

## 6. EVALUATION OF NON-CONFORMITIES AND IMPACT ON AUDIT

Any non-conformities found during the Audit will need to be addressed and closed by the Organization if they want to get certified to the relevant applicable OBP certification Standard. Organizations with non-conformities found during Audit will have an extra period of 60 calendar days from closing meeting audit date to correct, train, prepare and submit enough documentary evidence to the CB to show compliance with the non-conformities identified during the Audit.

The Auditor will remind client Organizations of the approaching deadlines for closing non-conformities - NCs. After reception of submitted information, Auditor will assess whether he proposes closure or not of pending non-conformities for the certifier to approve or not his proposal. If Auditor and certifier agree on closure of all pending non-conformities, a positive decision for certification can be proposed, and the information of the revision process for NC closure needs to be included and updated in the final audit report.

If the Organization does not submit sufficient evidence to close all non-conformities in the given time frame, a new Audit will need to be planned.

In case the Organization already has a certificate, and no sufficient evidence is submitted before the 60 calendar days deadline from renewal Audit date the certificate will be suspended for a maximum period of three months in which the Organization can provide evidence for closure of non-conformities. During suspension, Organizations cannot make any certified commercial transactions.

If the non-conformities are not closed during suspension period, the certificate is finally withdrawn and their presence as certified Organization in the ZPO [www.obpcert.org](http://www.obpcert.org) webpage eliminated until compliance with all requirements is verified through a new Audit.

Annex I contains a list of mandatory documents required for certification. The absence of any of these documents during the Audit will result in immediate non-conformities.

The following general and specific cases result in banning the Organization from participating in the certification scheme for a year:

### **General Cases for all OBP certification Standards**

- The Organization is found to be working with children<sup>5</sup> or apply unfair working conditions.
- Waste produced by the Organization is unmanaged causing Plastic waste to become OBP.

### **OBP Collection Organization Standard**

- The Organization has collected (or sourced) plastic that does not correspond to the definition of Ocean Bound Plastic and sold non-compliant OBP for Recycling purpose.

### **OBP Recycling Organization Standard**

- The Auditor is unable to reconcile with the provided documentation weight of OBP Input with OBP Output, or the sold weight is significantly superior (weight difference is neatly above any errors given by weight measurement tolerances or rounding up errors for example).

### **OBP Neutralization Services Provider Standard**

- The Organization cannot supply sufficient Documentary Evidence to demonstrate reconciliation between OBP Credits sold and collected and correctly treated OBP.
- The Organization has sold OBP Credits based on the collection of plastic or other waste that does not correspond to the definition of Ocean Bound Plastic.
- The Organization has sold OBP Credits for greater weight than the registered OBP collected and treated.
- The Organization has sold OBP Neutralization services/OBP Credits without properly treating the Non-Commercially Recyclable OBP (absence of treatment, dumping or treatment in a facility that is not an Approved Treatment).

### **OBP Plastic Producer and User Standard**

- The Auditor is unable to reconcile the weight of plastic used for the OBPN Scope and the OBP Credits purchased with the provided documentation.

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<sup>5</sup> See specific rules for the Social\* OBP Component

- The Auditor finds the sold weight of OBP Neutral/Positive products is significantly superior (weight difference is neatly above any errors given by weight measurement tolerances or rounding up errors for example).

### **OBP Brand Standard**

- Organization made claims that are grossly inconsistent with OBP products purchased and sold in order to deceive customers.

### **Social+ OBP Component**

- Organization is found to exclude ICs where Child Labor cases are identified instead of working on possible solutions to remediate the situation. Child Labor cases as employees in the premises of the Organization is however not tolerated and banning from the program is to be applied.
- In case of recidivism<sup>6</sup> of any of the general or specific cases mentioned above, the Organization will be permanently banned from participating in the program.

## **7. CERTIFICATION**

After the auditor has completed uploading all relevant audit documentation (including received documents from clients for closing non-conformities found during audit if applicable), the OBP certifier is responsible for reviewing all audit information and making a certification decision.

The certifier must be qualified to ZPO's requirements, to make the certification decision and must not have been involved in the evaluation and audit process of the Organization to be certified.

In case there is need for clarification, certifier shall communicate with auditor to address concerns.

If no NCs are found, and certifier decides that the Audit report contains all needed information to make a positive certification decision, the certifier can proceed to issue a Scope Certificate for the applicant Organization, for the relevant applied OBP Standard.

If NCs were registered during the Audit, but information to close them was sent to the CB within the allowed given time frame, and it is revised and approved by the Auditor

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<sup>6</sup> Recidivism is occurring when the Organization after being banned for a year is admitted again in the program and commits again at least one of the above-mentioned faults, causing the Organization to be definitely excluded.



and certifier, certifier can also proceed with the issuance of a Scope Certificate for the applicant Organizations.

If the certifier finds that the NCs were not addressed in the given time frame, or there is insufficient information to make a positive decision, the certifier shall notify the client and communicate the negative decision to grant certification and identify the reasons for it.

OBP Scope certificates must include the following:

- i) A unique certificate number
- ii) The OBP Logo and CB logo
- iii) (Legal) name and address of the certificate holder (operational unit)
- iv) Name and address of the Certification Body issuing the certificate
- v) Start and end date of the certification validity period (12 months, except for scope changes)
- vi) Scope of certification related to units, products, standards.
- vii) Place and date of issuance of the certificate
- viii) Stamp and signature of the issuing party
- ix) Appendices to the certificate, if applicable
- x) Version number and date of version

Every time the CB issues an OBP Scope certificate, it has a maximum of 3 calendar days to notify ZPO of the issuance, and send ZPO a copy of the issued report, application form, and scope certificate for uploading in the ZPO's registry.



## 8. CHANGING THE SCOPE OF CERTIFIED ORGANIZATIONS

Certified Organizations may experience a change in the scope of their activities after their audit and certificate was issued, and before the next annual audit takes place.

The CB is allowed to issue an updated Scope Certificate (SC) during its validity period to reflect the Organization's evolution upon receipt of Documentary Evidence with no need to carry out a new on-site audit only in the following cases:

- Addition of or changes to the certified products that use the same collection, transformation, recycling, logistics that were audited.
- Increase on the following categories according to the following limits:

Category	Maximal % increase of items <sup>7</sup>
Independent Collectors	30%
Active <sup>8</sup> Collection sites	25%
Storage and processing sites	0%
Small Collectors	20%
Sites for a Multisite Certification	0%
Subcontractor operations	15%
Approved Treatment facilities	0%

- Decrease of the number of items of the sampled categories above as long as not reduced to a number that affects the project capacity to deliver<sup>9</sup>.

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<sup>7</sup> For each item the number will be rounded to the nearest integer. For example, if an Organization has 2 Small Collectors, 20% gives 0.4, rounded to 0, no increase is authorized without Audit. If an Organization has 3 small Collectors, 20% gives 0.6, rounded to 1 the increase is allowed up to 1 Small Collector.

<sup>9</sup> For example, a case where an organization significantly reduces the number of Small Collectors or Independent Collectors without decreasing the volume of collected OBP should be investigated before accepting the reduction.

## 9. ANNEX I – MANDATORY DOCUMENTS TO BE PRESENTED

MINIMUM LIST OF DOCUMENTS REQUIRED FOR OBP COLLECTION ORGANIZATION STANDARD
Documentation demonstrating existence and legality of the operations of the Organization.
Quality management manual, quality organization chart, procedures or equivalent documents.
Training plan, training material (for a first Audit) plus training evidences (for a renewal Audit)
List of Independent Collectors (ICs) that work with Organization and in cases of Supplier Group certification, the lists of the ICs for each Small Collector.
Map(s) with location of the collection sites and when applicable waste management facilities such as sorting centers, reuse facilities, recycling center and final disposal sites.
Forms (templates for a first Audit or filled documents for a renewal Audit) which will be or are used to monitor collection operation or purchases. Example templates are supplied at <a href="http://www.obpcert.org">www.obpcert.org</a> .
Forms (templates for a first Audit or filled documents for a renewal Audit) which will be or are used to monitor the management of the collected plastic waste and ensure full traceability. OBP handling, storage, labeling & preparation for shipment procedures in line with SCM chosen.
Detailed Subcontractor list (if applicable), description of processes subcontracted, Documentary Evidence from the Subcontractor demonstrating its capacity to comply with the Standard requirements.
For a Multisite Certification, a description of the processes of each site, their localization and evidence that these sites comply with the definition to apply for Multisite Certification.
Waste management procedures and Documentary Evidences of management of the waste up to final disposition. (documental proof can be a template for a first Audit, must be official documents for a renewal Audit)
Mass balance of OBP Input and Output or Documentary Evidence permitting the reconciliation.

## MINIMUM LIST OF DOCUMENTS REQUIRED FOR OBP RECYCLING ORGANIZATION STANDARD

Documentation demonstrating existence and legality of the operations of the Organization.
Quality management manual, quality organization chart, procedures or equivalent documents
Training plan, training material (for a first Audit) plus training evidences (for a renewal Audit)
Sourcing contracts or at least letters of intent for a first Audit. For a renewal sourcing records should be given too (invoices, Transaction Declarations, transport documents...) with detailed list of suppliers.
Production management manual and procedures demonstrating compliance with Supply Chain Model chosen.
Mass balances adapted to the scope chosen and Supply Chain Model chosen, allowing weight reconciliation of Input and Output of OBP.
Detailed Subcontractor list (if applicable), description of processes subcontracted, Documentary Evidence from the Subcontractor demonstrating its capacity to comply with the Standard requirements.
For a Multisite Certification, a description of the processes of each site, their localization and evidence that these sites comply with the definition to apply for Multisite Certification.
Waste management procedures and documental proof of management of the waste up to final disposition. (documental proof can be an example for a first Audit, must be official documents for a renewal Audit)

## MINIMUM LIST OF DOCUMENTS REQUIRED FOR OBP NEUTRALIZATION SERVICES PROVIDER STANDARD

Documentation demonstrating existence and legality of the operations of the Organization.
Quality management manual, quality organization chart, procedures or equivalent documents.
Training plan, training material (for a first Audit) plus training evidences (for a renewal Audit)
List of Independent Collectors (ICs) that work with Organization and in cases of Supplier Group certification, the lists of the ICs for each Small Collector.
Map(s) with location of the collection sites and Approved Treatment facilities.
TAOBPW Estimation sheet. An example templates is supplied at <a href="http://www.obpcert.org">www.obpcert.org</a> .
Forms (templates for a first Audit or filled documents for a renewal Audit) which will be or are used to monitor collection operation or purchases. Example templates are supplied at <a href="http://www.obpcert.org">www.obpcert.org</a> .
Forms (templates for a first Audit or filled documents for a renewal Audit) which will be or are used to monitor the management of the collected plastic waste and ensure full traceability until Approved Treatment or Recyclable sale if applicable.
Waste management procedures and Documentary Evidences of management of the waste up to Approved Treatment (for treated OBP and for potential excess OBP). (documental proof can be a template for a first Audit, must be official documents for a renewal Audit)
Detailed Subcontractor list (if applicable), description of processes subcontracted, Documentary Evidence from the Subcontractor demonstrating its capacity to comply with the Standard requirements.
For a Multisite Certification, a description of the processes of each site, their localization and evidence that these sites comply with the definition to apply for Multisite Certification.
Self-Declarations and environmental license(s) of Approved Treatment facilities treating the waste on behalf of the Organization, or own licenses if the Organization is performing itself the Approved Treatment.
Mass balance of OBP inputs and outputs and Documentary Evidence permitting the reconciliation. (renewal Audit)
OBP Credits sold matching OBP mass balances (renewal Audit)

## MINIMUM LIST OF DOCUMENTS REQUIRED FOR OBP PLASTIC PRODUCER AND USER STANDARD

Documentation demonstrating existence and legality of the operations of the Organization and compliance with social requirements.

Quality management manual, quality organization chart, procedures or equivalent documents

Ocean Bound Plastic Neutral Scope determination and associated 12 months Plastic usage forecast.

Contract(s) with ZPO registered OBP Credit traders and/or Neutralization services provider(s) and provider(s) valid Scope Certificates copies.

Annual summary allowing reconciliation of Plastic used and OBP Neutralized through the purchase of OBP Credits (for a renewal Audit).

Detailed Subcontractor list (if applicable), description of processes subcontracted and Subcontractor(s) self-declarations.

For a Multisite Certification, a description of the process of each site, their location, and evidence that these sites comply with the definition to apply for multisite certification.

Waste management procedures and documental proof of waste up to final disposition.

## MINIMUM LIST OF DOCUMENTS REQUIRED FOR OBP BRAND STANDARD

Legal documentation of the applying entity and organization chart to be able to comprehend the position of the OBP central office in the organization.

OBP supplier list and relevant contracts with suppliers

Forecast (for a first certification) and summary table (for a recertification) of the purchased and sold OBP certified products.

Proposed claims drafts and/or register of approved claims ( for a recertification)

## MINIMUM LIST OF DOCUMENTS REQUIRED FOR THE SOCIAL+ OBP COMPONENT

### **For ICs (Section 5 of the component)**

IC community information records - List of ICs belonging to each community manager and their relevant critical information, and records of agreement of joining the Social+ OBP benefits and obligations.

Records of IC community manager visits for Child Labor prevention, remediation and monitoring.

OHS Assessment and event/monitoring records for employees and ICs.  
Occupational Safety training records. Medical monitoring and routine treatment records or evidence of solutions proposed/contracted.

Payment records and separate premium payments records for ICs.

Attendance records including panelists names and themes for the workshops.

### **For Employees (Section 6 of the component)**

Worker contracts for employees to verify employment relationship/benefits, minimum wages, ages and working hour policy. Records of working hours per employees.

OHS policy, organigram and OHS training records

Child Labor policy

## 10. ANNEX II - AUDIT PLAN TEMPLATE

Audit Plan

Name of contact

person in

Organization

and

Organization

name:

Attn.:

Address

Country

Client no.:

City, Date

Type of Audit	<input type="radio"/> Initial <input type="radio"/> Re-evaluation <input type="radio"/> Other:	
Scope of Audit		
Planned Audit date		
The objective of this Audit	Understand the compliance of the Organization with regards to the requirement of the OBP relevant certification Standard (specify)-	
Standard	Specify Standard	
Other reference documents (If applicable)	OBP LOG-GUI OBP-DEF-GUI OBP-FAQ-GUI Others (specify)	
Language of the Audit and reporting. (If different from the language of the Auditor and /or Auditee)	Audit: xxxx Reporting: English	
Logistic arrangements (travel between sites, on-site facilities, etc) (If applicable)	Organization desk / virtual Collection Site / Subcontractors premises / Production sites / Approved Treatment Facilities Handling, Weighting, Storage site, pretreatment Dispatch ... Waste Management (transport, disposal, valorization)	
Allocated Audit time according contract		
Auditors/inspectors		
Function	Name	Role/responsibility
Auditor 1		Auditor

Dear,



Hereby we would like to inform you about the planned schedule of your Audit. The objective of this Audit is:

The Audit will consist of an opening meeting, during which the scope will be reviewed, and the Auditor will explain the methods to be employed during the Audit, a review of the documents such as complaints files, administration, traceability documents, etc. Such documents must be readily available to the Auditor. Also, the persons responsible for processes that may be audited must be available to the Auditor. The Audit shall be finalized with a closing meeting, during which the findings are reported. Please note that the Auditor may at any time choose to deviate from this Audit plan.

The Certification Body Auditor must be given unrestricted access to all production, processing and administrative units and fields, all personnel and administration that the Auditor deems necessary.

All relevant documents which rule the Audit and certification will also be available on the Certification Body web-site at <http://www>.

Please also note that unavailability of key persons or documents or incorrect information given on the application form regarding distances and travelling time may cause the Audit to take longer. Any extra time spent on an Audit may result in an additional invoice for the client. If necessary, the Auditor will contact you to discuss specific arrangements for the Audit regarding travel arrangements, accommodation, etc.

If the objectivity of the Audit is compromised, the Auditor has the right to abort the Audit. Reasons can be for example the interference of accompanying persons. All costs arising from this case are charged to the client.

We kindly ask you to carefully check the details, as the continuation of the Audit will be in danger, if these details do not correspond with the present situation.

Please inform us directly if you would like to make any changes or amendments

With kind regards,  
Auditor.  
Phone:

## SCHEDULE

Date:		Location:	
Time	Activity - Reference to standard	Auditor	Auditee
8:00 – 8:30 a.m	Opening meeting		
9:00 – 10:00 a.m	Organization 1 : Desk		
10:00 – 12:00 p.m.	Organization 1 : Collection points/ Subcontractor visits / Production areas /Handling areas /Approved Treatment facilities /any applicable other		
12:00 – 2:00 p.m.	Organization 1 : Collection points/ Subcontractor visits / Production areas /Handling areas /Approved Treatment facilities /any applicable other		
2:00 – 3:00 p.m.	Lunch Break		
3:30 – 4:30 p.m.	Organization 1: Desk		
Date:		Location:	
Time	Activity - Reference to standard	Auditor	Auditee

\*We request you to reserve time for lunch and would appreciate if someone from your company can be present at lunch.

In case the proposed agenda is not viable, we request you to notify us in time.

All information gathered in the Audit will be treated confidential