



OCS LOGISTICS VERIFICATION FRAMEWORK

Required Management Practices

VERSION 1 (JANUARY 2025)

OCS Logistics Framework

Required Management Practices

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

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 to migrate 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.

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 reviewed at least once per year and/or integrated into ongoing management system processes that occur at least once per year. Updates are made as necessary when identified during review process.

D. Spill Response Plan has been developed to address any plastic resin spills that occur during handling or transport.

Spill Response Plan must include:

- Confirmation and documentation of specific spill response arrangements with applicable material suppliers and processors to address containment and disposal procedure for plastic resin spills during handling and/or transport.
- Confirmation and documentation of specific spill response arrangements made by the OCS Logistics member to address containment and disposal procedure for plastic resin spills during handling and/or transport.
- Applicable employees are educated on and have access to Spill Response Plan.
- Process for coordination and communication of specific actions included in the Spill Response Plan.
- Consideration of disposal and/or recycling for material recovered from spills during handling and/or transport.

OCS Logistics Verifier Checklist

Guidance

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)

The OCS Logistics Verifier can:

- Review facility risk assessment.
- Request a facility map (if not already included in the facility risk assessment).

<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 Logistics Verifier can:</p> <ul style="list-style-type: none"> 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.
<p>C. Has risk assessment been reviewed at least once per year and/or integrated into ongoing management system processes that occur at least once per year?</p>	<p>The OCS Logistics Verifier can:</p> <ul style="list-style-type: none"> Request evidence that the risk assessment has been reviewed at least once per year and that updates have been made as necessary. Or, request evidence of the management system process that has fully integrated the risk assessment and occurs at least once per year. Request evidence that updates have been made if need is identified during review process.
<p>D. Has Spill Response Plan been developed to address any incidences of plastic resin loss during handling and/or transport? (Must include all required components)</p>	<p>The OCS Logistics Verifier can:</p> <ul style="list-style-type: none"> Request documentation of Spill Response Plan. Evidence that employees have been trained on and have access to Spill Response Plan. Documentation of any processes and communication around specific actions included in the Spill Response Plan. Evidence of consideration of disposal and/or recycling for material recovered from spills during handling and/or transport.

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

<p>A. Incorporate strategies to prevent and mitigate plastic resin loss into existing housekeeping and operating inspections and procedures, including:</p> <ul style="list-style-type: none"> Strategies to prevent spills of plastic resin. Strategies to clean up resin in the event of a spill. Visual inspection of sampled higher risk areas, e.g., outfalls, facility fence line, bulk wash, clean out, storage. 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.	<p>Conduct periodic housekeeping inspections at a defined frequency, that incorporate:</p> <ul style="list-style-type: none"> • 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 sampled higher risk areas, e.g., outfalls, facility fence line, bulk wash, clean out, storage. • Incorporate prevention strategies into maintenance, contractor, and engineering activities.
C.	<p>Maintain an investigation and corrective action process that enables incidents of resin loss to be reported.</p> <ul style="list-style-type: none"> • Process must, at a minimum, enable incidents that are reportable as OCS Metrics for required data reporting to be tracked. This includes incidents involving containers, boxes, bags, supersacks, bulk trucks, and railcars.
D.	<p>Periodically review process and status of incident investigations and corrective actions for completion and effectiveness.</p>
E.	<p>Update resin loss prevention checklists and/or procedures as needed to drive continual improvement and incorporate learnings.</p>
F.	<p>Incorporate performance related to plastic resin loss into periodic, internal EHSQ Management reviews or similar corporate position.</p>
G.	<p>Report all required OCS Metrics to the OCS Program during each required reporting cycle.</p>

OCS Logistics Verifier Guidance		Guidance	
A.	<p>Have strategies to prevent and mitigate plastic resin loss been incorporated into existing housekeeping and operating inspections and procedures? (All required components included)</p>	The OCS Logistics Verifier can:	<ul style="list-style-type: none"> • Request documentation for housekeeping procedures and operating inspections.
B.	<p>Are periodic housekeeping inspections conducted at a defined frequency? (All required components included)</p>	The OCS Logistics Verifier can:	<ul style="list-style-type: none"> • Request evidence of housekeeping inspection protocols and/or checklists (all required components included). • Request evidence of prior housekeeping inspections having been conducted. • Request evidence that future housekeeping inspections are scheduled or have a defined frequency. • Request records of internal inspections / audits of higher risk resin loss locations. • Review evidence that plastic resin loss prevention has been incorporated into maintenance, contractor, and engineering activities.

<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 Metrics for required data reporting to be tracked.)</p>	<p>The OCS Logistics Verifier can:</p> <ul style="list-style-type: none"> 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 Metrics for required data reporting to be tracked.)
<p>D. Is the process and status of incident investigations and corrective action reviewed periodically for completion and effectiveness?</p>	<p>The OCS Logistics Verifier can:</p> <ul style="list-style-type: none"> Request evidence that the process and status of incident investigations and corrective action is reviewed periodically for completion and effectiveness.
<p>E. Are resin loss prevention checklists and/or procedures updated as needed to drive continual improvement and incorporate learnings?</p>	<p>The OCS Logistics Verifier can:</p> <ul style="list-style-type: none"> Request evidence that a learning from the investigation and corrective action process has been incorporated into a resin loss prevention checklist and/or procedure.
<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 Logistics Verifier can:</p> <ul style="list-style-type: none"> Request evidence that performance related to plastic resin loss has been incorporated into periodic, internal EHSQ Management reviews or similar corporate position.
<p>G. Have all required OCS Metrics been reported to the OCS Program during each required reporting cycle?</p>	<p>The OCS Logistics Verifier can:</p> <ul style="list-style-type: none"> Request evidence that all required OCS Metrics have been reported to the OCS Program during each required reporting cycle.

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

<p>A. Develop dedicated OCS training or integrate OCS into existing training for employees and contractors. Training must include:</p> <ul style="list-style-type: none"> Objectives of OCS. Applicability of OCS to individual's job. Procedures to prevent and mitigate resin loss.
<p>B. Conduct OCS training with all employees and contractors during initial on-boarding and at least annually thereafter.</p>
<p>C. Display the OCS Logistics certificate / documentation in a public area within the facility. Public areas may include but are not limited to a conference room, lobby or entry area, digital boards, or trophy case.</p>
<p>D. Display posters, digital screens, or other visual assets related to preventing or mitigating resin loss in areas where plastic resin is being handled within the facility.</p>

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 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 Logistics 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)	<p>The OCS Logistics Verifier can:</p> <ul style="list-style-type: none"> Request a copy of the dedicated OCS training or the training in which OCS has been integrated. (All required components included)
B.	Is OCS training conducted with all employees and contractors during initial on-boarding and at least annually thereafter?	<p>The OCS Logistics Verifier can:</p> <ul style="list-style-type: none"> Request evidence that OCS training has been conducted with all employees and contractors during initial on-boarding. Request evidence that OCS training has been conducted with all employees and contractors at least once per year on an ongoing basis.
C.	Is the OCS Logistics certificate / documentation displayed in a public area within the facility?	<p>The OCS Logistics Verifier can:</p> <ul style="list-style-type: none"> Conduct a visual inspection to confirm that the OCS Logistics certificate or other information is displayed in a public area within the facility.
D.	Are posters, digital screens, or other visual assets related to preventing or mitigating resin loss in areas where plastic resin is being handled within the facility?	<p>The OCS Logistics Verifier can:</p> <ul style="list-style-type: none"> Conduct a visual inspection to confirm that posters, digital screens, or other visual assets are present in areas where plastic resin is being handled within the facility and communicate resin loss prevention or mitigation information.
E.	Is OCS incorporated into periodic operational meetings to review OCS prevention and mitigation strategies and address any recent incidents of resin loss?	<p>The OCS Logistics Verifier can:</p> <ul style="list-style-type: none"> 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.
F.	Is OCS incorporated into periodic EHS meetings to review performance related to resin loss and consider opportunities for continual improvement?	<p>The OCS Logistics Verifier can:</p> <ul style="list-style-type: none"> 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.

<p>G. Have employees been engaged to increase awareness and commitment to preventing resin loss?</p>	<p>The OCS Logistics Verifier can:</p> <ul style="list-style-type: none"> Request evidence of employee engagement initiative, which may include the OCS Employee Pledge.
<p>H. Are OCS 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 Logistics Verifier can:</p> <ul style="list-style-type: none"> Request evidence that the OCS Metrics that are reported to the OCS Program are shared with employees at least once annually, either at the company or facility level.
<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 Logistics Verifier can:</p> <ul style="list-style-type: none"> Request evidence that a method has been created for employees and contractors to identify risk areas and suggest resin loss prevention strategies.

4. Audit OCS Logistics Management Practices Regularly

<p>A. Incorporate OCS management practices into EHSQ internal audit process that occur in a defined frequency. Incorporate OCS into applicable, integrated operational excellence systems.</p>
<p>B. Complete EHSQ internal audit process at defined frequencies.</p>
<p>C. Incorporate OCS related performance into periodic, internal EHSQ Management Reviews.</p>

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

5. Encourage Partners to Prevent Resin Loss and Join OCS

- A. Promote OCS with supply chain partners to help them understand the importance of preventing resin loss.
- B. Resin loss prevention practices and performance is considered in procurement process for relevant vendors.
- C. Promote open communication with relevant supply chain partners around preventing plastic resin loss, including the creation of a process to provide and receive notifications related to plastic resin loss incidents if they occur.
- D. Actively participate in OCS program. Activities may include participating in OCS committees and working groups, contributions to development of OCS resources, attending or speaking in OCS webinars, attending or speaking at OCS annual conference, among other program activities..

OCS Logistics Verifier Checklist	Guidance
A. Is OCS promoted with supply chain partners to help them understand the importance of preventing resin loss?	<p>The OCS Logistics Verifier can:</p> <ul style="list-style-type: none"> Request evidence that information on OCS has been promoted with supply chain partners.
B. Has resin loss prevention practices and performance been considered in procurement process for relevant vendors?	<p>The OCS Logistics Verifier can:</p> <ul style="list-style-type: none"> Request evidence that resin loss prevention practices and performance is considered in procurement process for relevant vendors.
C. Is open communication promoted with relevant supply chain partners around preventing plastic resin loss, including the creation of a process to provide and receive notifications related to plastic resin loss incidents if they occur?	<p>The OCS Logistics Verifier can:</p> <ul style="list-style-type: none"> Request evidence that open communication is promoted with relevant supply chain partners around preventing plastic resin loss, including the creation of a process to provide and receive notifications related to plastic resin loss incidents if they occur.
D. Is participation in OCS active?	<p>The OCS Logistics Verifier can:</p> <ul style="list-style-type: none"> Request evidence of participation in OCS committees and working groups, contributions to development of OCS resources, attendance or speaking roles in OCS webinars, attendance or speaking roles at OCS annual conference, or other OCS program activities.

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