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PC-ENV. - S01	GPCA Plastic Management Scheme	02	1 September 2024	OCS Task Force Team /GPCA Plastic Committee	Approved by Dr. Abdulwahab Al-Sadoun
PC-ENV.-S01-ADD01	Addendum: Certification & Surveillance Requirements	01	15 April 2026	GPCA/ GAC	Approved

This document is supplemented by Addendum PC-ENV.-S01-ADD01 (Effective 15 April 2026) regarding Certification and Surveillance requirements

GPCA Plastic pellets, flakes and powders Management GPCA Scheme

REV 2.0	Validation Approval	Last Date Reviewed: 29-Aug-24
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1.0 Purpose

The purpose of this **Plastic pellets, flakes and powders Management Scheme** is to establish a consistent framework for the implementation of plastic pellets, flakes and powders management program at the Facility, and to enhance engagement on plastic management. The overall goal of this Scheme is to achieve continuous improvement in Operation Clean Sweep (OCS®) execution to drive towards zero plastic loss to the environment.

2.0 Applicability

This Scheme applies to all plastic resin **Manufacturing** or Handling operations, including **Warehouses** and **Bulk Terminals**, project activities and **Transportation**.

3.0 Definitions

Abnormal Weather Event – An event that could cause an uncontrolled discharge of plastic from containment because of rain, wind or other weather-related factors.

Bulk Terminal – A third party location in which plastic materials are transferred from Flatbed trucks, railcars, dry bulk trucks or any other transportation trucks into another container or product silo storage.

Certifying Body- A certifying body is an independent third party that conducts audits and handles a certification process and has been approved by Accredited Body for a sector and can provide compliance certificates.

Conformity Assessment – Requirements for certifying bodies providing audit and certification to operate under ISO/IEC 17021-1:2015 that contains principles and requirements for the competence, consistency and impartiality of bodies providing audit and certification.

EHSS – Environment, Health, Safety and Security dept. is Facility Department that is the custodian of the GPCA Plastic Management Program and responsible for its implementation, measuring performance and incident reporting.

Facility/Facilities – Any member (including their affiliates) of GPCA that has joined the OCS® program by signing the pledge.

GPCA – The Gulf Petrochemicals and Chemicals Association (GPCA) represents the downstream hydrocarbon industry in the Gulf Petrochemical and Chemical association.

GCC Countries – Gulf Cooperation Council (GCC; Arabic: مجلس التعاون الخليجي), is a regional, intergovernmental, political, and economic union comprising Bahrain, Kuwait, Oman, Qatar, Saudi Arabia, and the United Arab Emirates. The council's main headquarters is located in Riyadh, Saudi Arabia.

Incident – Unexpected event resulting in spill/loss (accident and/or near miss).

Near-miss – An unplanned event does not lead to a loss of pellets to the environment but has the potential to do so.

Operation Clean Sweep® (OCS®) – A program that contains guidelines to help Plastics industry operations managers reduce the accidental loss of pellets, flakes, and powder from

the processing Facility into the environment.

OCS® Regional Administrator – The entity that administers the OCS® or applicable Plastics management program in the region is: **Gulf Petrochemicals and Chemicals Association (GPCA)**

OCS® Management Systems Requirements – The specific requirements outlined by the OCS® Regional Administrator.

Plastics – For purposes of this Scheme, "Plastics" includes pellets, flakes, powders, fines and shavings, but does not include manufactured Plastics, such as, bags, bottles, etc.

Plastic Handling Equipment – Equipment is assembled primarily to create value from the manufacturing, handling, processing, analyzing, etc. of plastic, including but not limited to, equipment and piping. This includes all process equipment that contains fluff or pellets.

Plastic Recovery Equipment – The equipment that is utilized to contain and allow removal of plastic material from Facility water systems that are not part of the manufacturing, handling, processing, or analyzing processes. This includes equipment that handles plastic that is no longer contained in the process equipment.

Reportable Plastic Loss – An event that results in the loss of plastic material to the environment outside of the Facility that is obligated to be reported to a **Regulatory Agency** as per the law and regulation for each GCC Countries.

Regulatory Agency – regulatory body, or independent agency is a government authority that is responsible for exercising autonomous dominion over some area of human activity in a licensing and regulating capacity by forcing rules and regulations, and imposing supervision or oversight for the benefit of the public at large.

Transportation Partners –Third parties responsible for moving plastic products from manufacturing sites to packaging partners or end-users.

Unexpected Plastic Loss – Plastic loss within a Facility due to spills, equipment failure or mismanagement, or the failure to contain Plastics during maintenance of plastic containing equipment. Note: Plastic loss outside of the Facility that does not meet the definition of a "Reportable Plastic Loss" shall be considered an Unexpected Plastic Loss.

Warehouse – is a dedicated area or space used for the management and storage of finished Plastics products inside or outside Facility prior to shipping or distribution.

4.0 Key Responsibilities and General Requirements

4.1. Each facility whether resin producers, transporters, bulk terminal operators or plastics processors has a role to play in eliminating resin pellets, flakes and powders loss to the environment through their management commitment of OCS® by signing the "Pledge to help prevent losses. OCS® pledge shall be submitted to GPCA.

4.2. Comply with all applicable environmental laws and regulations that address pellets, flakes and powders containment.

4.3. GPCA Member Facility shall demonstrate its commitment through internal document signed by the Executive management.

4.4. Each facility shall encourage their stakeholders to sign OCS® pledge.

4.5. Each facility shall establish OCS® objectives and processes necessary to deliver results in accordance with the organization's environmental policy and objectives.

4.6. Each facility shall provide all required resources to implement OCS® program and actions such as equipment, tools, etc.

4.7. The implementation of OCS® program shall be part of Facility site walkthrough including site management team covering all plastic containment and recovery systems.

4.8. Each facility shall communicate OCS® requirements, programs, and updates to facility's internal and external stakeholders.

4.9. Each facility shall consider OCS® requirements evaluation for new project or modification.

4.10. **Facility Customer service or Commercial Teams** – responsible for engaging and encouraging customers to improve practices to eliminate loss of plastic from their facilities and logistics operations.

4.11. **Facility Supply Chain** – responsible for engaging and encouraging service providers to improve practices to eliminate loss of plastic from their facilities, logistics operations, in transit, warehousing or customer facilities.

5.0 Operation Clean Sweep® Team

5.1.1. Each facility's employees and contractors shall understand and comply with OCS® program requirements and associated Facility's procedures.

5.1.2. At a minimum of semiannually, each facility OCS® focal point or team shall provide regular updates to site executive management on OCS® program implementation of the following:

- The extent of which OCS® objectives have been met
- Key Performance Indicators (KPIs)
- OCS® Training plan and effectiveness of the conducted trainings
- OCS® related projects
- The Outcome of internal and external OCS® audits
- The status of the regulatory compliance with regulations governing pellet containment
- Recommendations for continual improvement

6.0 Procedures

6.1.1. Each Facility shall have processes and procedures in place to respond to plastics spills within and outside of the Facility boundary.

6.1.2. Each Facility shall develop and review operating, maintenance and other relevant procedures (e.g. sampling, loading, unloading) to ensure that best practices are utilized in all relevant operating modes (e.g. start-up, shut-down,

normal, abnormal, emergency, etc.).

6.1.3. Each Facility shall develop and review procedures for planned clean-up and housekeeping activities (including trapping, vacuuming, etc.) that minimizes plastic material loss that could end up in the environment.

Note: Best Management Practices do not allow polymers powders or fines to be washed down to storm or wastewater systems.

6.1.4. Each Facility shall have procedures in place to ensure that any recovered plastic material is segregated properly, labeled, and recycled as practicable.

7.0 GPCA Responsibility

7.1.1. **GPCA staff** – OCS® program owner and industry representative for Facility operations covered by this Scheme:

- Maintain and update OCS® resources, including, management system level audit protocols for Audits and facilities Self-reviews;
- Provide guidance to Facility OCS® teams.
- Maintain awareness-level of OCS® program training for the company.
- Liaise with outside organizations on best management practices.
- Participate in best practice sharing regularly with customers, peers, and industry members to ensure full value chain engagement in an effort to prevent plastic loss to the environment.
- Assist Facility in developing and maintaining Plastic Management program, or other required relevant documents.
- Report OCS® metrics to the GPCA members through the Annual Sustainability / OCS® Report.
- Track environmental regulatory developments and provide advocacy on proposed plastic loss regulations.
- Provide guidance to Facility OCS® teams; and
- Develop guidance documents for regulatory reporting for facilities.

7.1.2. GPCA Plastic Committee is responsible for developing and implementing a communication plan to sustain plastic management culture change throughout the GPCA members.

8.0 Assessments

8.1.1. Each Facility shall document potential sources of plastic loss to the environment and consider such loss scenarios in the Facility's risk registers. As part of this process, each Facility shall identify potential plastic loss areas for normal and abnormal weather conditions, including other emergency operations like loss of power or cooling water.

8.1.2. Risk Assessment shall be conducted and reviewed based on Facility environmental aspect / impact management system and frequency. In absence of specified management system and frequency, then risk assessment to be conducted and reviewed annually.

8.1.3. Each Facility shall perform a targeted review of Plastic Handling and Plastic Recovery Equipment to identify any improvements needed for preventing plastic loss to the environment.

9.0 Self-Proactive Inspections

9.1.1. Each Facility, in conjunction with the other applicable teams, shall establish regular inspections to monitor the effectiveness of Plastic Handling and Plastic Recovery Equipment. The inspections shall include a process to document and address any identified deficiencies.

9.1.2. Each Facility shall visually monitor its own applicable outfalls, discharge points and other potential areas that identified to have a risk of plastic loss to the environment at specific frequency. These visual inspections shall be conducted before and after abnormal weather events.

10.0 Audits

10.1. Internal Audit: The Facility shall have a procedure to document and carry out a periodic internal audit that covers:

10.1.1. The effectiveness of internal procedures
10.1.2. Facility performance review and communication
10.1.3. The compliance of Facility inspection programs and its effectiveness
10.1.4. The training and competency and its effectiveness
10.1.5. The corrective and preventative actions for audit findings and reported incidents.

10.2. External Audit:

10.2.1. GPCA or an external 3rd party Certifying Body 'appointed auditor' may carry-out a peer review audits for GPCA members Facilities every three years to ensure compliance to the GPCA Plastic pellets, flakes, and powders Management Scheme and to enrich the learning opportunities among GPCA members Facilities. Refer to PC-ENV.-S01-ADD01.

10.2.2. Each GPCA member Facility shall perform conformity audits for its owned regional plastics manufacturing, transporting and warehousing facilities. These audits shall be conducted by an independent Certifying Body that is recognized by an Accreditation Body. If GPCA member Facility meets the requirements, then the Certifying Body shall issue a compliance certificate that provides assurance of compliance and conformity to the GPCA Plastic Management Scheme.

10.2.3. The Certifying Body 'CB' will employ ISO/IEC 17021-1:2015 for Conformity Assessment to ensure the Facility has fulfilled the requirements of GPCA pellets, flakes, and powders Management Scheme. ISO/IEC 17021-1:2015 gives generic requirements to the CBs performing audit and certification will provide confidence to the audits process.

11.0 Metrics, Reporting, and Estimation of Plastic Loss

11.1.1. Each Facility shall develop metrics for demonstrating continuous improvement (e.g. reduction in Unexpected Plastics Losses within the Facility, improvement in inspections results, etc.). Facility shall define a baseline for monitoring, comparison, and checking the effectiveness of OCS® initiatives.

11.1.2. Facilities shall track the amounts of Plastics recovered and recycled on an annual basis.

11.1.3. Each Facility shall have an internal documented process for detecting, incident reporting and characterization of unexpected plastic losses. This includes both plastic losses within the Facility and outside of the Facility. Each Facility shall use best engineering judgment in estimating the mass quantity in Kilogram of every loss event.

11.1.4. For each Facility the accumulated Plastics losses from all documented plastic losses incidents and events shall be reported annually as part of GPCA Sustainability "EHS metrics" .

11.1.5. Each Facility shall investigate to determine the root cause(s) of the plastic losses events and implement corrective and preventive actions.

11.1.6. Review and analyze incidents information, trends to reduce unexpected plastic losses and the effectiveness of corrective actions.

12.0 Supply Chain and Polymer Handling Requirements for Commercial Associates

12.1. Transportation Partners

12.1.1. Unless an exception is approved, new or revised contracts with Transportation Partners shall expect that the transportation partner pledge to implement the (OCS®) program through the OCS® Regional Administrator (GPCA). Transportation Partners shall be expected to agree to the requirements outlined by the OCS® program. Exceptions to the agreement of these requirements shall be approved and documented by the Facility management.

12.1.2. Transportation Partners shall be reasonably expected to operate and maintain trucks that are fit for the operation, including seals and integrity to prevent plastic loss. Transportation Services shall develop and maintain procedure requirements for pellet recovery.

12.2. Warehouses and Bulk Terminals

12.2.1. Contracts with warehouses that are utilized by GPCA member Facility shall require the implementation of OCS® program.

12.2.2. Inspections of Bulk Terminals by the operator shall include an assessment of plastic loss prevention measures and shall be completed at a minimum of once every three years.

12.2.3. Inspections of transportation equipment, packaging facilities, warehouses and sea bulk storage locations by the operators shall include an assessment of plastic loss prevention measures and shall be completed at a minimum of every 18 months.

12.2.4. Supply Chain staff members at facilities are responsible for reviewing inspection reports to assess whether warehouses and bulk terminals are meeting the requirements and objectives outlined in the GPCA Scheme. They are tasked with reiterating expectations to stakeholders and facilitating ongoing improvements in plastic handling performance.

12.3. Compounders manufacturing partnering with GPCA member Facility

12.3.1. Compounders shall be encouraged to adopt the OCS® Program.

12.3.2. Compounders operators shall be required to implement a spill prevention program.

12.3.3. Inspections of the Compounding Facility by the operator shall include an assessment of plastic loss prevention measures and shall be completed at a minimum of once every 3 years.

12.4. Customers (including agents, distributors, and recyclers)

12.4.1. All regional customers shall be encouraged to pledge to the applicable local plastic management program through the OCS® Regional Administrator (GPCA). GPCA staff shall share the requirements outlined by the OCS® program.

12.4.2. Truck operators servicing customers are responsible for ensuring trucks are in clean condition and free of plastic pellets.

12.4.3. Facility Supply Chain staff shall review inspection reports to determine agent and distributors' performance and recommunicate the expectation and obtain continuous improvements.

13.0 Training

13.1. All employees, including contractors, shall receive frequent awareness on OCS® program and the Facility's plastic management efforts.

13.2. The organization shall determine the training needs associated with the OCS® program based on the employees' specific roles and responsibilities. The

organization shall provide a training program for all personnel working on the Facility (including relevant contractors).

13.3. Each Facility shall develop appropriate training as applicable that includes:

- Awareness and accountability for plastic loss prevention, containment, reporting of losses and clean-up.
- Applicable procedures to prevent, contain, clean-up and recovery of plastic loss.

14.0 Documentation

As a minimum, each GPCA member Facility in relation to the adoption of GPCA Plastic Management Scheme shall maintain a records of :-

- Relevant incident reports
- Assessment and continuous improvements
- Inspection records
- Key Performance Indicators “KPIs”
- Amounts of plastics recovered and recycled
- Self-assessment and Risk registry
- Action tracking and closure
- OCS® training records

15.0 Revision

The review of this Plastic Management Scheme is the responsibility of GPCA. The GPCA Plastic Committee shall ensure that the Scheme is reviewed at minimum once every three years and revised as necessary. Major changes to the Scheme shall be shared with GPCA member Facilities for comment and feedback. Any revised Scheme shall be communicated with all stakeholders.

End of Document

ADDENDUM TO THE GPCA PLASTIC MANAGEMENT SCHEME (OCS®) - PC-ENV.-S01-ADD01

Purpose:
This addendum mandates a three-year recertification cycle and introduces requirements for surveillance audits. These measures are intended to ensure continuous compliance with the requirements of the GPCA Plastic Pellets, Flakes, and Powders Management Scheme.
Subject: Certification Validity and Surveillance audit Requirements

Definitions:

- GPCA member Facility:
  - Any site handling plastic pellets, powders or flakes across the entire plastics value chain. A GPCA member company may have multiple sites, each of the sites must undergo certification.
- Audit**:**
  - Audit carried out by an auditing organization independent of the client and the parties that rely on certification (e.g., third-party certification audit), for the purpose of certifying the client's management system.

References:
1. PC-ENV.-S01-ADD01
2. ISO/IEC 17021-1
3. GPCA Operation Clean Sweep Manual

Effective Date: 15th April 2026
Revision: 01

Responsibilities: GPCA Committees**,** GPCA Member Facilities, Handling Operations, Accreditation bodies.

1. **Scope**

This addendum serves to clarify and standardize the audit frequency for the Operation Clean Sweep® (OCS®) program. To drive the goal of zero plastic loss to the environment and ensure continuous improvement, GPCA has established a formal certification cycle and surveillance mechanism.

2. Audit programme

2.1 Certification bodies shall develop an audit programme for each certified client for the full certification cycle to clearly identify the audit activity/activities required to demonstrate that the client's management system fulfils the requirements for Operation Clean Sweep® (OCS®) program.
2.2 The audit programme for the initial certification shall include a two-stage initial audit, surveillance audits in the first and second years following the certification decision, and a

recertification audit in the third year prior to expiration of certification. The first three-year certification cycle begins with the certification decision. Subsequent cycles begin with the recertification decision. The determination of the audit programme and any subsequent adjustments shall consider the size of the client, demonstrated level of management system effectiveness and the results of any previous audits.
2.3 Surveillance audits shall be conducted at least once a calendar year, except in recertification years. The date of the first surveillance audit following initial certification shall not be more than 12 months from the certification decision date.
2.4 Where the client operates shifts, the activities that take place during shift working shall be considered when developing the audit programme and audit plans.

3. Re-Certification Cycle (3 Years)

In alignment with GPCA's commitment to rigorous environmental standards, all OCS® certifications issued to member companies shall be valid for a period of three (3) years.

- Member companies must undergo a re-certification by an approved independent third-party Certifying Body every three years to maintain their membership status.
- Continuous Improvement
- The three-year certification cycle ensures that facilities regularly update their risk registries, training records, and pellet loss prevention procedures.

4. Surveillance Audits

To bridge the gap between full re-certifications and ensure that management practices remain active. Certifying bodies shall perform a surveillance audit of the certified clients (GPCA member Facilities). The audit can be conducted virtually, by documents/records review, or physically in case-by-case situation.

- Frequency
  - Surveillance audits shall be conducted at least once a calendar year
- Virtual audits
  - The audit shall be conducted virtually via secure digital platforms to review key performance indicators (KPIs), incident reports, and self-assessment records.
- Scope: Audits shall focus on along with other requirements:
  - Review of plastic recovery and recycling data.
  - Verification of OCS® training records for new and existing personnel.
  - Closure status of any Action Items identified during the initial/recertification site audits.
  - internal audits and management review;
  - a review of actions taken on nonconformities identified during the previous audit;
  - complaints handling;
  - effectiveness of the management system with regard to achieving the certified client's objectives and the intended results of the respective management system (s);
  - progress of planned activities aimed at continual improvement;
  - continuing operational control;
  - review of any changes;

Compliance and Maintenance

Failure to complete either the surveillance audits or the three-year re-certification will result in the suspension of the facility's OCS® certification status.

Reporting: All assessment reports (both full and virtual) must be submitted to the GPCA for verification and tracking. (mohamed@gpca.org.ae)