



Requirements for a pellet certification scheme

Introduction

Pellet¹ pollution is the second largest source of direct microplastic pollution to the ocean and is known to cause serious harm to marine biodiversity. Pellet loss can occur at every stage of the supply chain: pellet production (including recycled pellets), transport, storage, and conversion into plastic products.

It is widely accepted that a well-designed supply chain certification scheme for good pellet management is the most effective way to address pellet loss (as suggested, for example, in the European Commission's European strategy for plastics in a circular economy).

The design of such a scheme is key to ensuring its effectiveness in tackling the pellet loss problem. Pellet loss is a global issue, and multiple certification schemes for pellet handling are likely to be developed. This document sets out the minimum requirements needed to ensure certification schemes are fit for purpose and specify an equivalent level of performance, transparency and accountability, thus providing a level playing field across the plastics industry.

Certification scheme requirements

A certification scheme for pellet handling must follow the principles set out in ISEAL codes of good practice², and meet the following expectations:

1) Certification must provide a mechanism to verify that companies are compliant with an agreed standard of best practice to prevent pellet loss to the environment, wherever pellets are handled.

Does certification require robust, independent auditing to provide assurance of best practice wherever pellets are handled? Is the auditing process sufficiently stringent to provide guarantees that certified companies are not losing pellets to the environment, either chronically or in acute incidents?

1.1 Recognised standards: certification must use a pellet handling standard or standards that have been developed with multi-stakeholder consultation and are publicly available. The standards must meet the minimum requirements set out in a separate FFI & Fidra position paper: *Requirements for a pellet handling standard*.

1.2 Third party audits: the scheme must require audits by independent professional auditors who are accredited by a recognised authority to assess compliance with the standard being used and have had training to do so.

1.3 Site-level certification: certification must be done at site / depot level (not at company level) and involve a site inspection. The resulting certification will only apply to the specified site or (in the case of transporters) depot.

1.4 Universal access: the scheme must be available to and appropriate for any company that handles or has custody of pellets or plastic products made from them, whatever their size or function in the supply chain.

1.5 Dealing with non-compliance: certification must include appropriate procedures for addressing non-compliance, the criteria for which must be clearly defined within the certification scheme. Procedures must result in failure / loss of the certificate if non-compliance is not addressed within a standard, short timeframe, as specified by the scheme. Completion of corrective actions must be confirmed by the independent auditor.

1.6 Regular recertification and surveillance: certification must be valid for a limited time (e.g. 3 years), during which surveillance audits must be conducted at least annually and the conclusions from the surveillance audits, including any non-compliances and completion of required corrective actions, made public.

1. 'Pellet' refers to any solid polymer raw material microplastic including pellets, powders and flakes

2. <https://www.isealalliance.org/defining-credible-practice/iseal-codes-good-practice>

- 2) **Certification must be sufficiently transparent to allow regulators and the general public to understand what the scheme entails and assess its effectiveness.**

Can interested stakeholders access enough information to understand the processes required for certification and what standard a company must achieve to be certified? Can the certification scheme provide evidence that it is effectively dealing with pellet pollution?

2.1 Scheme transparency: details of the certification scheme must be publicly available, so that the equivalence of different schemes can be assessed, and to provide assurance that effective measures are in place to prevent pellet loss at sites certified to any of the available schemes.

2.2 Identification of certified companies: certificate holders must be easy to find e.g. logged on a public register, to allow selection of certified operators by others in the supply chain.

2.3 Public reporting: certification must include production of a certification report, a summary of which must be publicly available. The summary report must include information on non-compliances, required corrective actions and estimated volumes of pellets lost at the certified site. No commercially sensitive information will be required in the summary report.

2.4 Tracking progress: certification schemes must make information available that allows an assessment of scheme effectiveness, e.g. aggregated data on pellet loss to the environment from certified operators.

- 3) **Certification must require tracking of certified pellets and products made from them, along the full chain of custody, from production to placing final products on the market.**

Can any actor in the supply chain easily verify that the raw material of plastic products they purchase has been handled responsibly at each stage of custody since pellet production? If a retailer makes claims about their products being 'pellet loss free', can we be completely confident that pellet loss has been prevented throughout the supply chain?

3.1 Secure chain of custody: certification schemes must require that material can be uniquely identified throughout its journey along the supply chain, accompanied by information on the certification status of all actors who have had custody of the material. This is so that anyone placing plastic products on the market can verify they come from certified supply chains. This could be supported through a digital tracking system.

- 4) **Certification schemes must encourage uptake throughout the industry.**

Is there sufficient support for uptake to make it feasible for the scheme to be implemented across the whole plastics industry?

4.1 Working towards compliance: Certification schemes must provide a way to facilitate and encourage companies to work toward certification. Such a mechanism is particularly important considering the large number of SMEs & micro-businesses in the plastics industry. Ideally, a support scheme to assist SMEs to gain certification should be created.³

4.2 Enabling supply chain pressure: The system must be designed to ensure that supply chain pressure can drive uptake and encourages an industry-wide culture shift toward zero pellet loss. For example a recent report for the Scottish Government proposes making procurement from certified companies a condition of certification.⁴

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3. For example, BRC Global Standards offer their START! program as a stepping stone to full certification for SMEs. www.brcgs.com/brcgs/start/

4. Oswald et al. (2019) Preventing Supply Chain Plastic Pellet Pollution Report for the Scottish Government by Eunomia Research & Consulting

