

# OCEAN BOUND PLASTIC



## NEUTRALITY SUBPROGRAM OBP NEUTRALIZATION SERVICES PROVIDER STANDARD



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## **Reference Documents**

This Standard shall be used together with the following complementary documents:

- 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

All documents are available on the “document center” section of the OBP Program website ([www.obpcert.org](http://www.obpcert.org))

## **Revisions and Updates**

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

## **Revision history**

<b>Date</b>	<b>Version</b>	<b>Changes</b>
8 <sup>th</sup> Sept. 2020	V1	Initial Release
13 <sup>th</sup> May. 2021	V1.1	<ul style="list-style-type: none"><li>• 2. Definition of OBP Credits and update of the OBP Neutralization Certificate definition (additions <i>in italic</i>).</li><li>• 3. OBP Credit mention (additions <i>in italic</i>).</li><li>• 6. Various updates (changes <i>in italic</i>).</li><li>• Removal of the Neutralization Certificate template from the Standard Annex (now available online at <a href="http://www.obpcert.org">www.obpcert.org</a>).</li></ul>
8 <sup>th</sup> Sept. 2021	V2	<ul style="list-style-type: none"><li>• Changes from the previous revision (<i>in Italic</i> have been formatted in normal text), new changes are not tracked for</li></ul>



		<p>legibility, but previous version is available upon request. Key changes are listed below:</p> <ul style="list-style-type: none"> <li>• Incorporation of section 5 for clarification of projects eligibility.</li> <li>• Incorporation of requirement 6.1e (already an existing requirement but only listed in the OBP-FAQCB-GUI document).</li> <li>• Definitions and annexes have been removed from the Standard and are now available in documents OBP-DEF-GUI and OBP-TEM-GUI.</li> <li>• Incorporation of requirements 6.8f and 6.8g.</li> <li>• Clarifications in section 7 (without changes in the requirements).</li> </ul>
8 <sup>th</sup> Sept. 2024	V2.1	<ul style="list-style-type: none"> <li>• Description of OBP Credits in section 3. Addition of requirements 6.1f and 7g.</li> </ul>



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# 1. INTRODUCTION

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.

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.

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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).*



## 2. TERMS AND 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.

## 3. SCOPE

This Standard is applicable to any Organization (for profit, not for profit, governmental or non-governmental) involved, or who wants to be involved in carrying out abandoned Plastic collections and environmental cleanings for neutralization purposes, to certify the origin of the Plastic they collect as Ocean Bound Plastic and be able to issue OBP Credits. OBP Credits are third-party verified evidence that the Organization has effectively removed from the environment a given weight of Non-Commercially Recyclable OBP within the requirements of this Standard

This Standard covers activities related to collection of OBP until it's treatment by means of an Approved Treatment. These activities may include some or all the following:

- Collection (by own means or by purchase to Independent Collectors or Supplier Group members).
- Handling & storage of raw or prepared OBP.
- Preparation of OBP: cleaning, sorting, drying, compacting, shredding, baling...
- Transport.
- Hand over to an Approved Treatment facility or treatment by the Organization itself.

Organizations that work nation-wide or internationally, and, have multiple sites that are distinct legal entities administrated by a central office and wish to certify several operations, may apply for a Multisite Certification following the requirements mentioned in ANNEX III of the OBP-DEF-GUI document.

The Standard is applicable worldwide.

## 4. EFFECTIVE DATE

This certification Standard becomes effective on the release date and shall become compulsory to use on the 8<sup>th</sup> of December 2024. New certification applicants and already certified Organizations shall be assessed against this revision of the Standard from this date onwards.

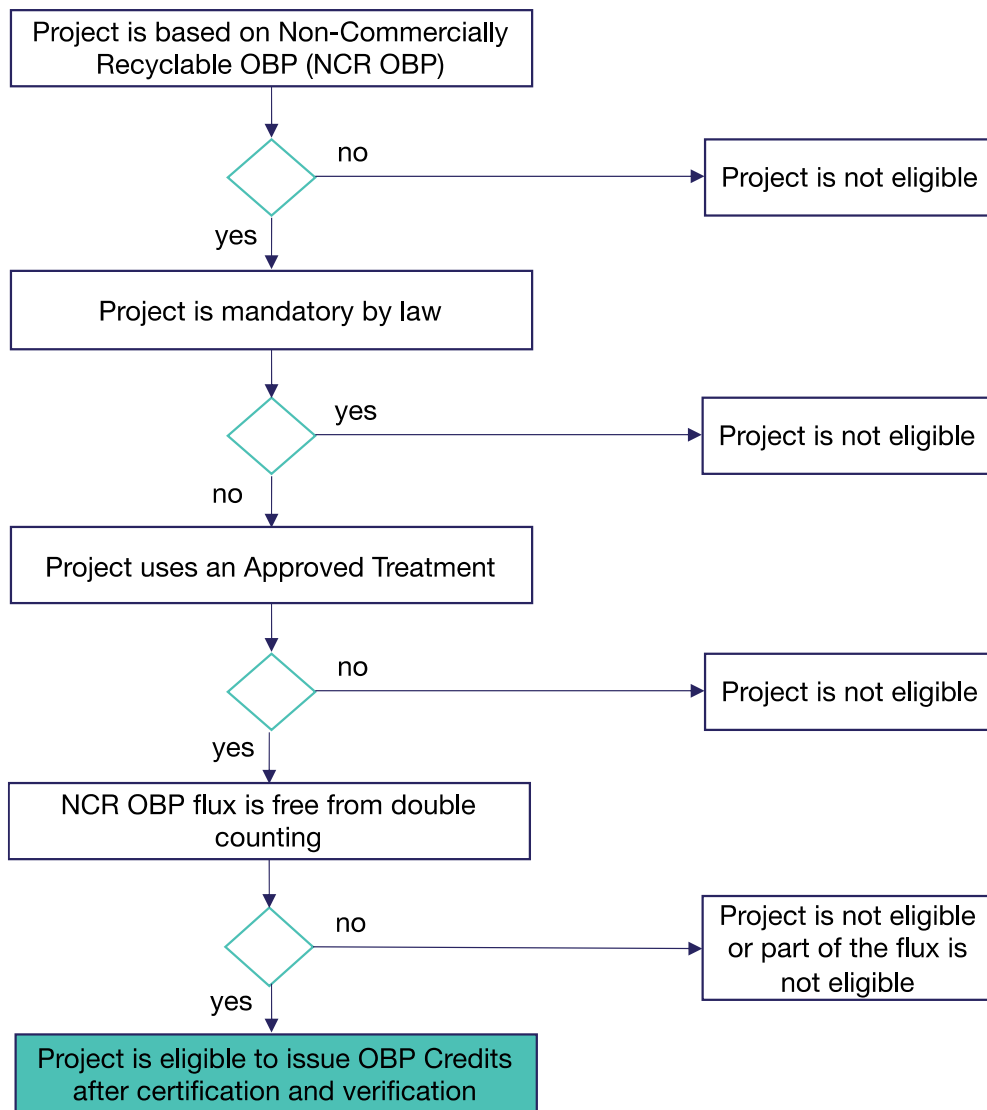


# 5. PROJECTS ELIGIBILITY TO ISSUE OBP CREDITS

Projects are eligible to issue OBP Credits under the requirements of this Standard if they comply with all four of the following conditions:

1. Projects are based on Non-Commercially Recyclable Ocean Bound Plastic (NCR OBP) as defined in document OBP-DEF-GUI.
2. Projects are not mandatory by law or regulations (see section 5.1).
3. Projects collect and use an Approved Treatment (see section 5.2) for the NCR OBP.
4. Issuable Credits have not been used/sold under another Plastic credits scheme or an Extended Producer Responsibility (EPR) scheme (see section 5.3).

The diagram below summarizes the steps to follow to determine project eligibility





## 5.1. LEGAL SURPLUS

The definition of OBP includes its abandoned nature, so collected Plastic waste will be excluded in the current local waste management practices. This means, either 100% collection of Plastic waste is not yet an enforceable legal requirement in the collection area, or compliance with the Plastic waste collection laws is insufficient. For this reason, the collection of OBP implies a legal surplus condition.

However, the Organization will need to demonstrate that the OBP Credits have been issued outside a legal EPR framework or any other legal obligation (for example a court ruling forcing the collection of Plastic waste).

## 5.2. APPROVED TREATMENTS

There are 4 basic conditions that need to be fulfilled for a treatment option to be considered an Approved Treatment; i) treatment facilities need to have an environmental license from relevant authorities, ii) treatment facilities operate in such a way that no leakage of Plastic to the environment may occur from the facility premises iii) treatment technology and methodology ensures that Plastic incorporated into the process cannot leak back into the environment, and iv) treatment facilities comply with the minimum social and environmental requirements specified in this Standard and sign a self-declaration following the template provided in the OBP-TEM-GUI document.

Approved Treatments can be grouped in the following categories:

### **Waste to Energy:**

Any waste treatment process that allows conversion of the potential energy contained in the OBP into heat, fuel, or electricity, like incineration with energy recovery, gasification or pyrolysis, or other similar technologies. This also includes the preparation and use of RDF for co-processing in cement kilns or power plants.

### **Disposal:**

Burial in a landfill with the following minimum requirements: (i) fenced, (ii) lower impermeable membrane and a lixiviates' treatment facility (iii) covered with an upper layer of soil material preferably on regular basis but at least once the cell is full, (iv) location, topography and structure ensure Plastic waste is not at risk of entering waterbodies.



## Recycling:

Non-Commercially Recyclable OBP may be sold into the Recycling value chain as a way of treatment. However, for the Organization to be able to issue OBP Credits on top of the OBP sale, it shall demonstrate its Collection Costs for that OBP are above or equal to US\$ 300/metric ton<sup>4</sup>. If Collection Costs vary for different NCR OBP streams, the Organization may segregate these costs per streams and only apply for OBP Credits for the portion whose Collection Costs are above the threshold.

## Other Treatments:

- Processes mixing various types of Plastics together or using sorted Plastics to usually form a new sturdy material for the construction industry or for urban furniture (Plastic lumber, bricks, tiles, benches...)
- Direct reuse of Plastic to make new products like fashion articles, interior design products, and art objects/sculptures (excluding temporary art).
- Direct reuse of Plastic as filler for the construction industry. Only accepted if the methodology/technology used can guarantee Plastic waste in the structure will prevent Plastic leakage into the environment.
- Direct reuse of sorted and pre-processed Plastic scrap into an asphalt mixture under controlled conditions so Plastic melts combining with the asphalt, avoiding the risk of microplastic generation from non-blended Plastic particles.

Note: the above list of examples and processes is not exhaustive. There are numerous technological innovations arising quickly which can increase the number of Approved Treatment options. A treatment option that complies with the 4 basic conditions mentioned and can be assimilated into one of the Approved Treatment categories above, can be considered valid.

## 5.3. PREVENTION OF DOUBLE COUNTING RISK

An Organization may be taking part in other Plastic credit schemes (third party certified or not), or be involved in the collection and treatment of Plastic waste in the framework of an EPR scheme. In that case, it should have a very clear physical and administrative segregation of fluxes so no tonnage of Plastic already accounted for in other Plastic credits or EPR schemes may be accounted for as tonnage for the issuance of OBP Credits. The Organization shall declare all schemes in which it is participating and show mass balances of its operations to evidence the absence of double counting.

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<sup>4</sup> This requirement is to ensure that:

- The OBP Neutrality Subprogram does not incentivize a commercial Recycling value chain that is already working.
- The OBP Neutrality Subprogram does not penalize Recycling over other Approved Treatments by excluding the possibility of Recycling this OBP.

The Cost Collection threshold is calculated based on current cost estimates and potential OBP Credit market prices. It may be necessary to adjust it in the future based on the evolution of these two parameters.



## 6. REQUIREMENTS

### 6.1. LEGAL COMPLIANCE, CHILD LABOR, FAIR WORKING CONDITIONS

- a) The Organization shall demonstrate compliance with national laws and requirements related with its operation.
- b) The Organization shall not use child labor in any way. The Organization shall demonstrate compliance with the national minimum age for employment and/or the age of completion of compulsory education, whichever is higher. In no case shall the Organization rely on work performed by children under the age of 14.
- c) The Organization shall not use forced or compulsory labor as defined by ILO convention 29 and shall especially forbid itself to create any condition that will generate an unfair dependence of workers towards the Organization (such as retaining identity documents, salaries, generating debts).
- d) The Organization shall have social policies in place ensuring that workers are at least paid minimum legal wages applicable.
- e) When purchasing OBP to Independent collectors the Organization shall ensure the above criteria are met through fair business practices, like no purchasing to children and payments above the minimum reference recyclable market prices for the OBP collected.
- f) The Organization shall identify factors that could be negatively affected by the project implementation with stakeholders and the environment, to ensure that no unintended harm is caused or likely to be caused. When a possible harmful consequence is identified, the Organization shall design and implement a remediation plan.

### 6.2. QUALITY MANAGEMENT SYSTEM

- a) The Organization shall have or create a dedicated management system to ensure that it can maintain its compliance to the requirements of this Standard. One person within the Organization shall be appointed as quality manager to oversee the implementation of the Standards' requirements. This person shall also be the main contact person with the Certification Body (CB) during Audits and their preparations.

- b) The Organization shall have procedures that can be made available to the CB to demonstrate its compliance with requirements of this Standard.
- c) The responsibilities to implement procedures shall be distributed to identified key personnel within the Organization under the supervision of the quality manager and these personnel shall receive adequate training to ensure they understand requirements of the Standard in its latest version.
- d) The Organization shall keep documentation to prove conformity to the Standard requirements. The documentation of previous Audits must be kept for at least 4 years and presented to the auditor upon request. A non-exhaustive list of records to be kept includes methods and procedures, list of collection sites, records of collection activities, transport registers, final disposition registers, annual weight and volume summaries, sales records, Neutralization Certificates issued, nonconformity records, training material, brand mark usage approvals.

### **6.3. IDENTIFICATION OF COLLECTION SITES**

- a) The Organization shall determine and specify the collection sites (names and geographical location of selected beaches, riverbanks, districts and communities or any other site type) they will work in.
- b) The Organization should be able to justify the choice of the site in terms of, first, environmental impacts and then, with regards to other criteria such as social impact, accessibility, logistical aspects, safety of operations, etc.

### **6.4. ESTIMATION OF TOTAL ANNUAL OBP WEIGHT TO BE COLLECTED**

- a) The Organization shall calculate the potential Total Annual OBP Weight (TAOBPW) it can collect and/or purchase. A template for calculating the TAOBPW can be found in the OBP-TEM-GUI document.
- b) Different types of evidence can be used by the Organization to justify its calculation of TAOBPW such as studies, reports, extrapolations of similar operations, past-experience, collector numbers, etc.
- c) Organizations can sell OBP Credits within the certified calendar year, for up to the TAOBPW estimation that has been included in the Scope Certificate. Annual Audits allow for adjusting this TAOBPW. However, if required, Organizations can request CBs to assess the increase of TAOBPW during the year, if they can justify why and how the Organization has been able to collect more OBP.

## 6.5. COLLECTION SYSTEM IMPLEMENTATION AND MONITORING

The Organization shall have protocols and control processes to be able to plan, monitor and demonstrate that it has performed the collection of OBP according to the certification requirements.

- a) For the collection of Shoreline OBP and Waterways OBP, collector's location shall be monitored during collection, either through direct supervision, or through using appropriate technology. Similarly, purchasing Shoreline OBP or Waterways OBP from Independent Collectors or Small Collectors is allowed only if Independent Collectors' or Small Collectors' staff location is monitored during collection. For Small Collectors, they shall also be part of a Supplier Group as defined in ANNEX II of the OBP-DEF-GUI document.
- b) For the collection of Potential OBP the purchase from Independent Collectors is allowed provided the purchasing location is situated within 45 km from the shoreline and the sites where Independent Collectors are operating are identified. The purchase of Potential OBP from Small Collectors as defined in ANNEX II of the OBP-DEF-GUI document is allowed through the Supplier Group certification.
- c) For the collection of Fishing Material OBP the purchase from fishermen considered as Independent Collectors is allowed provided the purchasing location is on the coast or a riverbank. If the location is on a riverbank, the river shall be connected directly or through its main stem to the ocean. Purchasing from fishermen considered as Small Collectors is allowed as part of a Supplier Group, following the requirements defined in ANNEX II of the OBP-DEF-GUI document.
- d) The Organization needs to demonstrate adequate workshops/trainings have been carried out with collectors (staff, volunteers, and Independent Collectors), to prove they understand the definition of Ocean Bound Plastic, so they collect correctly. This includes i) specification of its abandoned nature (refer to OBP-DEF-GUI document), ii) determined distance from shore, rivers or tide lines unless justified otherwise, iii) specification of types of waste not accepted as OBP, and iv) specification of maximum possible removal of non-Plastic waste (sand, mud, water, metals, non-synthetic textiles, organic waste, wood, paper, etc) so no false tonnage with other materials is generated.
- e) For the collection of Shoreline OBP and Waterways OBP monitored activities, the Organization shall keep records for each collection site of daily collection activities. Records of daily collection activities need to include info such as: i) date ii) name of collection site, iii) names of all participating collectors, phone numbers, and type of collector (staff, or volunteers), iv) name of supervisor, v) type of collection event (routine or special), vi) total number of bags, big bags,... collected, vi) Exact weight and volume if possible or approximate weight and volume per bag, vii) number of bags, or weight and volume segregated per type of final destination when applicable, viii) pictures of before and after collection activity when possible.

Reference collection record templates are available in the OBP-TEM-GUI document. In cases where the Organization uses technology to track the work of collectors, equivalent information shall be available.

- f) For the purchase of OBP from Independent Collectors, the Organization shall keep records of daily purchases including, (i) name and contact details of Independent Collectors, (ii) purchased weight and volume, (iii) location of collection. The Organization shall have a list of the Independent Collectors it is working with, including as a minimum (i) full name, (ii) contact details, (iii) area where they work. Reference collection record templates are available in the OBP-TEM-GUI document.
- g) The Organization shall monitor the conformance of collectors in relation to the definition of OBP and have a contingency plan to cater for nonconforming collectors (e.g. warnings, contract or equivalent employment agreement termination, finalization of purchases...).

## **6.6. MATERIAL INSPECTION, PREPARATION, SUPPLY CHAIN MODEL**

The Organization shall have protocols and control processes to ensure traceability from collection point to destination of OBP. The Organization shall be able to demonstrate the following:

- a) Upon end of collection or upon receipt at a logistic center, all OBP collected shall be visually inspected, sized (volume measurement), weighed and registered by OBP category. If Plastic has been compressed, this shall be mentioned. This information can be included in the daily records filled in during collection or purchase.
- b) The Organization may classify the OBP collected according to its destination. This separation is only likely to be performed for the sale of OBP to third parties for its Recycling or valorization, or, if the Organization is itself Recycling or valorizing all or some of it. In such cases, the Organization shall measure volume and weight separately for each flux.
- c) The Organization shall choose at least one Supply Chain Model as defined in ANNEX I of the OBP-DEF-GUI document and follow the requirements stipulated in this annex.

## 6.7. SUBCONTRACTORS

The Organization may use, for parts of its process involving OBP but not for collection itself, one or several Subcontractors.

- a) The Organization shall have an updated list of these Subcontractors, detailing which operations they are realizing on behalf of the Organization. Final Treatment facilities shall not be considered Subcontractors and these activities need to comply with requirements in sections 5.2 and 6.8.
- b) Each Subcontractor shall have a contract with the Organization. These contracts shall state that Subcontractors must comply with internal traceability requirements related to chosen Supply Chain Model for the subcontracted process manipulating OBP.
- c) Subcontractors shall sign a self-declaration of compliance with minimum social and environmental requirements specified by this Standard. Copies of signed Subcontractors' self-declarations shall be kept by the Organization. A self-declaration template is available in the OBP-TEM-GUI document.
- d) Subcontractors are not obliged to become certified under this Standard, however it is likely that their production site(s) will be visited during an Audit of the Organization. The CB will perform a risk assessment of Subcontractors, and if any are considered high risk, a sample of them will be inspected. The following factors are considered high risk for Subcontractors:
  1. Subcontractor handles OBP certified Plastic and other Plastics in its facility.
  2. Subcontractor is not certified to any chain of custody standard
  3. Subcontractor is the last step on process and does not return the product to the certified organization, but rather dispatches directly to the next actor in the supply chain or to the final treatment facility.
  4. Subcontractor is handling more than 30% of all the OBP volume that the Organization processes
- e) Subcontractors are not allowed to further subcontract any part of their work associated with OBP.

- f) Every transaction of OBP Material between the Organization and its Subcontractor(s) shall be recorded and in cases of volume/weight changes or if a blend has been realized a mass balance system justifying the differences shall be associated with each transaction.
- g) Subcontracting is considered as such, only if the Organization keeps the ownership of the OBP.

## **6.8. DESTINATION OF COLLECTED OBP, ANNUAL SUMMARIES**

The Organization shall have protocols and control processes to ensure traceability post collection until final destination of OBP. The Organization will only be able to issue Neutralization Certificates and corresponding OBP Credits for OBP whose destination is an Approved Treatment.

The Organization may naturally sell collected Commercially Recyclable OBP for Recycling purpose or recycle it itself, but this weight will not be accounted for issuing OBP Credits. This is because Commercially Recyclable OBP already has an economical value and a market and therefore does not require payment for its collection. Organizations willing to sell OBP Credits and sell certified Commercially Recyclable OBP may certify themselves to both subprograms; through this Standard and the OBP Collection Organization Standard.

- a) Approved Treatments can be performed by the Organization itself or by third parties.
- b) The Organization shall have copies of agreements it has with carriers, buyers and/or Approved Treatment facilities for collected OBP.
- c) The Organization shall have copies of transport/proof of treatment by an Approved Treatment/sales documents for each transaction of collected OBP.
- d) Transport / proof of treatment by an Approved Treatment facility / sales documents must imperatively include a reference of weight and volume. If Plastic has been compressed this should be mentioned.
- e) The Approved Treatment facility shall sign a self-declaration of compliance with minimum social and environmental requirements specified by this Standard. Copies of signed Approved Treatment facilities' self-declarations shall be kept by the Organization. A self-declaration template is available in the OBP-TEM-GUI document.



- f) The Organization shall have an itemized table summary to facilitate reconciliation of all the collection activities carried out throughout the year showing: i) total annual volume and weight summaries, ii) type of collection events, iii) total annual volume and weight summaries of OBP treated by an Approved Treatment.
- g) If the Organization sells a portion of its NCR OBP to a Recycler as certified OBP it shall issue a Transaction Declaration following requirements of chapter 5.9 of the OBP-COL-STD Standard.

## **6.9. OBP TRADEMARKS AND LABEL USES**

- a) Organizations eligible to issue OBP credits can use OBP promotional labels, provided they are certified with this Standard.
- b) The status of the Organization as certificate holder for offering Neutralization services and OBP credits can be promoted with the OBP promotional label in websites, social networking, business cards, printed material, promotional items (t-shirts, caps, banners, etc), or any other corporate communication the Organization sees fit.
- c) The Organization shall refer to the reference document OBP-LOG-GUI before any public use of the OBP Logos is made. Organizations that do not comply with these guidelines may lose the right to use the OBP trademarks.
- d) The Organization shall request an approval of the intended artworks to its CB and shall keep a register of all the approved uses of the OBP promotional labels and On-Product Labels sent by the CB.
- e) The OBP and ZPO trademarks shall not be used: (a) in a way that could cause confusion, misinterpretation, or loss of credibility to the OBP certification scheme; (b) in a way that implies that ZPO endorses, participates in, or is responsible for activities performed by the Organization outside the scope of certification; (c) to promote product quality aspects not covered by the OBP certification.

## 7. OBP NEUTRALIZATION CERTIFICATES

Neutralization Certificates are documents issued by the CB upon Organization's request, that prove to third parties that the Organization has effectively removed from the environment a given weight of Non-Commercially Recyclable OBP within the requirements of this Standard, and corresponding OBP Credits can be issued.

- a) Organizations shall request their CB for a Neutralization Certificate when they want to issue and sell OBP Credits. Organizations may make financial arrangements with OBP Credit buyers to receive upfront payments, but OBP Credits can only be issued once evidence of the work done and conformity by the CB has been verified.
- b) Neutralization Certificates can only be issued by the CB that has delivered the Neutralization Services Provider Scope Certificate to the Organization while it is valid.
- c) Organizations shall apply for the issuance of a Neutralization Certificate to the CB and supply the necessary Documentary Evidence (proof of collection and Approved Treatment) to support the elements claimed in the Neutralization Certificate. A Neutralization Certificate template with required data fields is provided in the OBP-TEM-GUI document.
- d) Before CBs can issue a Neutralization Certificate, they must submit it to Zero Plastic Oceans for its validation, serialization of OBP Credits, and accountability in a public registry.
- e) As detailed in chapter 6.4, Organizations cannot sell Neutralization services for a greater weight than the TAOBPW declared in their Scope Certificate. This means they cannot request issuance of Neutralization Certificates, and corresponding OBP Credits, for a greater weight either.
- f) Organizations must have annual summaries of issued Invoices for OBP Credit sales (with corresponding issued Neutralization Certificates), and these must imperatively match annual summaries mentioned in 6.8f.
- g) For the first certification cycle, Organizations may have carried out pilot operations and collected and treated certain volumes of NCR OBP before they receive their OBP Neutralization Service Provider Scope Certificate. Once the Organization is

certified, these initial volumes are eligible for OBP Credit issuance by the CB upon Organizations´ request only if the following conditions are met:

- i. Organization has all the proper Documentary Evidence to support the issuance of OBP Credits as per the requirements of this Standard.
- ii. Auditor was able to verify the conformity of the Documentary Evidence of pre-Audit pilot operations during the onsite Audit.
- iii. The requested volume doesn't exceed 30% of the TAOBPW (this volume will not be discounted in the following years´ TAOBPW),
- iv. The requested volume is based on operations maximum 6 months prior to receiving their Scope Certificate.