

# The VinylPlus<sup>®</sup> Product Label



The VinylPlus<sup>®</sup> Product Label for Sustainable Development  
(PVC products in construction)

**Auditor Guidelines Document – Version 1.2 (January 2019)**

**In collaboration with**



# Contents: Label Clauses and Sub-clauses

## **General Notes**

- i. *The clauses and sub-clauses in the Label either focus on Company / Location evidence or on Product / Product Group related evidence. The former type of evidence may well be common to a number of different Products or Products Groups and as such need not be repeated when seeking labelling of additional products providing the common evidence remains current. In this contents list the management system, location or company related clauses are shown in **green**, product or product group related clauses are shown in **blue**.*
- ii. **Definition of the term “product”:** *This label can be applied to a **single product but also to a product range or product system**. A product range or product system applies where all of the conditions of the label are met equally by all parts of a product range or product system. It may be that all products in a product range or product system will **require only a single evaluation** against a common management system and aspects related to location.*
- iii. *The term constituent materials in the scheme indicates all materials used within the formulation of the final product. It does not include packaging materials, lubricants or consumable office products associated with manufacture (e.g. paper, print materials etc.).*
- iv. *This product certification scheme has been developed following the guidelines as set forth in EN ISO/IEC 17067:2013. The applicability of the scheme is for a type 6 product certification (VI c + d), as defined in Table 1 of the ISO standard.*
- v. *VinylPlus will strive to develop an independent audit process. Auditing can either be done by BRE or an accredited certification body. The list of accredited bodies for the scheme will be updated and communicated to the applicants by VinylPlus. It will be up to the applicant to select the certification body that will do the assessment.*

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## **1. VinylPlus partnership – A commitment to sustainable development**

### **1.1 Integration of the VinylPlus program into company life**

- a. A valid **Partnership certificate** issued by the Vinyl Foundation for the current year will be required.
- b. **Written documents** (e.g. minutes, reports or notes) will be required as evidence to demonstrate activities associated with implementing the VinylPlus charter. These must be signed or approved by the Company Chairman or a relevant Board Member. These documents must detail the Company's response to the VinylPlus challenges and should list agreed actions, updates, progress, comments and/or deadlines with subjects the company tries to implement.
- c. A list of **key activities** associated with the Charter is included in the [Appendix](#) below. Not all of these need to be implemented to score credits. The number of total credits scored is determined by the number of activities successfully undertaken. Provide a minimum of 5 examples of successful activities to score the first credit.
- d. A final extra credit can be scored if the Company has been a **partner of the Vinyl Foundation for the last 3 years** – though credits in the Key Activities area need to have been scored to secure this additional credit.

## **2. Organisational Management Requirements**

### **2.1 Responsible sourcing policy**

- a. A formal written **Responsible Sourcing Policy** will need to be seen as evidence ([see Appendix](#)).
- b. The Policy must be in a form that is **appropriate** to the organisation, the product, the product group or the product system which is being evaluated, and follows all the principles associated with the VinylPlus label.
- c. The Policy must have been **approved** by the organisation's senior management (i.e. signed and dated by the Company Chairman or a relevant Board Member).
- d. The Policy must have been **effectively communicated** to all staff, and the staff must understand the principles behind the Policy.

### **2.2 Legal compliance**

- a. Check and secure evidence that a **procedure has been established** to identify, understand and list all the applicable legal requirements associated with the production of the product, the product group or the product system which is being evaluated.
- b. Check and secure evidence that these legal **requirements apply** to the product, the product group or the product system which is being evaluated through the implementation of the Responsible Sourcing policy described in 2.1.a above.
- c. Check and secure evidence that the legal requirements and associated procedures are fully **integrated** within the Company's management system.
- d. Checking the legal compliance should include the legal requirements on the **upstream raw materials chain**. It should for example be checked, that the process used to manufacture the chlorine used to produce the PVC is included in the legally binding conclusions of the Best Available Techniques (BAT) Reference Document (BREF) for the Production of Chlor-alkali published in December 2014 by the European Commission, pursuant Article 13(6) of the Directive 2010/75/EU on Industrial Emissions (IED). Being not considered as a BAT, the mercury cell technology can no longer be used in the European chlor-alkali units since 11 December 2017.

### 2.3 Quality management system

- a. Check and secure evidence that there is a **documented management system** for the product, product group or product system which is being evaluated. This system must **follow the principles of ISO 9001:2015**.
- b. Check that the management system **includes or makes reference to** the Responsible Sourcing policy described in 2.1a.

For additional credits

- c. Check that the management system is certified **to ISO 9001:2015 by an accredited organisation**. Ensure that the certification is **current** and is **applicable to the product, product group or product system** which is being evaluated and to the **site or location** where the manufacture of these products takes place.

### 2.4 Supplier management system

- a. Check and secure evidence that there is a documented management system for the **purchasing process** to implement the responsible sourcing policy described in 2.1a.
- b. Check and secure evidence that the purchasing policy is fully **integrated into the quality management system** noted in 2.3.
- c. Check and secure evidence that there is an **approved supplier list** for the manufacture of the product, the product group or the product system which is being evaluated and determine the procedures by which this list has been derived.
- d. Check and secure evidence that the company has a **Corporate Social Responsibility (CSR) policy or statement**. Confirm that the policy is signed by senior management and that it includes positive actions supported by the provision of supporting evidence.
- e. Check and secure evidence that an appropriate **risk assessment** ([see Appendix](#)) has been completed for all constituent materials of the product, the product group or the product system which is being evaluated, where they have been purchased from **outside the EU** or from countries which have **not signed the ILO Declaration on Fundamental Principles and Rights at Work**.

## 3. Supply Chain Management Requirements

### 3.1 Material traceability through the supply chain

- a. Secure as evidence a table showing a specification of all constituent materials used in manufacture of the product, the product group or the product system which is being evaluated. The table must indicate the source of all the constituents, the proportion of each material as used in the product (both as mass and volume) along with relevant traceability data (see b. below) for the manufacturer. The term 'source' refers to the description in the standard i.e.:
  - the production and supply of mass produced materials
  - the recovery and supply of recycled materials; or
  - the production and supply of by-products or production residues from other industrial process
- b. Establish the proportion of constituent materials (both by mass and volume) which have eligible evidence of traceability. Traceability to 'source' (as defined in a. above) can be demonstrated by methods such as:
  - valid ISO 9001:2015 certification for the material
  - some other formal chain of custody scheme

- ad hoc demonstration of traceability e.g. purchase orders and delivery notes
- for recycled materials EuCertPlast or Recovynyl documentation

For a 'Compulsory' score check that 60% of source materials are traceable through the means described in b. to appropriate source organisations. Evidence must be provided to prove the traceability e.g. copies of valid ISO 9001:2015 certificates for a proportion of all the certified – e.g. all certificates for limited numbers (e.g. up to a total of 10 certified source materials). If there are more constituent materials then a minimum of 10 eligible certificates is needed across all materials.

c. A list of Recovynyl recyclers can be found on the Recovynyl website.

For additional credits

d. Check that 75% or 90% of source materials are traceable through the means described in b. to appropriate source organisations. Again, evidence of traceability will be required as above.

### 3.2 Environmental management systems in the supply chain

a. Provide a table listing all the constituent materials used in the manufacture of the product, the product group or the product system which is being evaluated. The table must indicate the source of all the constituents, the proportion of each material as used in the product (both as mass and volume) along with relevant **Environmental Management System (EMS) data** for the manufacturer (see b. below). The term 'source' refers to the description in the standard i.e.:

- the production and supply of mass produced materials
- the recovery and supply of recycled materials; or
- the production and supply of by-products or production residues from other industrial process

b. For a 'Compulsory' score check that **the proportion of constituent material claimed as traceable in 3.1** is covered by an EMS that, as a minimum, is **equivalent** to ISO 14001:2015 (the system need not be certified to ISO 14001:2015). The organisation seeking certification for its product, product group or product system **must also** have an EMS which is as a minimum equivalent to ISO 14001:2015. The [Appendix](#) provides a summary of the minimum requirements for a EMS equivalent to ISO 14001:2015. Evidence must be provided to prove the suitability of the EMS e.g. copies of the systems documents for a proportion of sources – e.g. documentation for all companies where there is a limited number of suppliers (e.g. up to a total of 10 constituent materials). If there are more constituent materials, then a minimum of 10 eligible documented schemes is needed across all materials.

c. For small and developing recyclers **ONLY** - an environmental statement of intent (signature by top management) will be accepted rather than an ISO 14001:2015 equivalent system.

For additional credits

d. Check that 60%, 75% or 90% of source materials are covered by valid ISO 14001:2015 certification and that the organisation seeking certification for its product, product group or product system **also** has an EMS which is certified to ISO 14001:2015.

### 3.3 Health and safety management systems in the supply chain

a. Provide a table showing a list of all the constituent materials used in the manufacture of the product, the product group or the product system which is being evaluated. The table must indicate the source of all the constituents, the proportion of each material as used in the product (both as mass and volume) along with relevant **Health and Safety Management System**

**(H&SMS) data** for the manufacturer (see b. below). The term 'source' refers to the description in the standard i.e.:

- the production and supply of mass produced materials
- the recovery and supply of recycled materials; or
- the production and supply of by-products or production residues from other industrial process

b. For a 'Compulsory' score check that **the proportion of constituent material claimed as traceable in 3.1** is covered by an H&SMS that, as a minimum, monitors:

- Near miss incidents
- Time loss incidents
- Fatal incidents

The organisation seeking certification for its product, product group or product system **must also** have an H&SMS which is, as a minimum monitors the same issues. Evidence must be provided to prove the suitability of the H&SMS e.g. copies of the systems documents for a proportion of sources – e.g. documentation for all companies where there is a limited number of suppliers (e.g. up to a total of 10 constituent materials). If there are more constituent materials, then a minimum of 10 eligible documented schemes is needed across all materials.

#### For additional credits

c. Check that 60%, 75% or 90% of source materials are covered by either

- a health and safety management system which is **certificated by an accredited organisation to OHSAS 18001:2007 or ISO 45001:2018**, or
- an **equivalent** documented H&S MS which is **independently assessed**.

and that the organisation seeking certification for its product, product group or product system **also** has:

- a health and safety management system which is **certificated by an accredited organisation to OHSAS 18001:2007 or ISO 45001:2008**, or
- an **equivalent** documented H&S MS which is **independently assessed**.

## **VinylPlus – The Five Sustainability Challenges**

### **4. VinylPlus Challenge 1 – Controlled Loop Management**

#### **4.1 Use of recycled PVC in the assessed product**

- a. VinylPlus has decided a general definition of "recycled PVC" – see [VinylPlus Sector Definitions](#).
- b. At the site audit the **PVC recycling definition** for the sector of the product, product group or product system which is being evaluated has to be **shown to be available and understood** by the organisation being assessed. Evidence will be required to demonstrate this availability and understanding.
- c. Evidence has to be seen and secured to demonstrate to the auditor that the product has a **product specification**, with clear instructions to use a given proportion of a certain material as recycle during production. This proportion can vary slightly for single production lots, depending on the availability of the recycle, but must be kept as an overall average.
- d. The auditor must check the last 12 months of production runs for each product, product group or product system which is being evaluated to check that the proportion described in b. above was **achieved**. This will be done using the VinylPlus/sector PVC waste definition.
- e. The calculation of **recycling content** shall use the following formula:

**(PVC recyclate/ (virgin PVC + additives/fillers + PVC recyclate)) x 100 = recycling content**

#### **4.2 Waste management**

- a. Evidence describing the **waste volumes going to landfill** for the whole company or the audited location (whichever is appropriate for the audit) must be seen and taken in evidence.
- b. A written **policy document** describing the assessed organisation approach to **waste management** (particularly minimising waste to landfill) must be seen and taken in evidence. The policy must be signed by the chairman or a board member.

##### For additional credits

- c. Evidence must be seen that waste management is **part of a company reporting scheme** with appropriate Objectives and Targets set and which are reviewed regularly at senior level. Waste volumes must be certified by **EuCertPlast, Recovinyl** or equivalent organisation.
- d. For performance level c) in the Standard the company must provide evidence that they have a **controlled material loop process** (moving towards 'zero waste') for the product, product group or product system which is being evaluated. This scheme will operate with customers or other downstream users with the assessed company taking back PVC waste volumes and recycling them into new product.

#### **4.3 Design for re-use or recycling**

Robust evidence must be seen, demonstrating how the product, product group or product system which is being evaluated is designed to be reused, to be recycled or is formulated to contain a higher amount of PVC recycling volumes than usual. The [Appendix](#) contains a list of criteria that can demonstrate, re-use/recycling is a priority for running new product development projects.

### **5. VinylPlus Challenge 2 – Organo-chlorine Emissions**

#### **5.1 PVC resin used in manufacturing the product**

- a. The element 5.1. may be applied to product families / groups of products made from PVC reaching up to a complete production site.
- b. The compulsory element in 5.1. refers to the ECVN charters. There are 2 charters which the industry has committed to in 1995 and 1998, dealing with emissions during the manufacturing of PVC resin as well as the maximum content of residual monomer in the resin.
- c. There are 2 ways for the auditor to verify compliance to these charters. One is the current membership of the supplier in ECVN, the other is via a technical audit, carried out under the responsibility of BRE, verifying the compliance with the above charter of at least one of the manufacturer's VCM and PVC manufacturing sites by a technical audit (the "charter audit"). It is at the auditor's discretion to verify that the production unit to be audited is really a 'site' where commercial production takes place (to avoid pilot plants being proposed as a 'site'). This technical audit will be carried out every 2 years.
- d. A matrix of European resin manufacturers is **provided in the Appendix** showing details regarding ECVN current membership and **compliance** with the various criteria described under b) in the Standard. An **"equivalent scheme" of the ECVN Charters** means: The PVC producers in the ASEAN region have set up an organisation called AVC (**Asean Vinyl Council**). They have also decided to set up an "AVC Environmental Voluntary Standard" following the model of the ECVN Charter. The formal announcement has been postponed, but some principles are already agreed, i.e. that it will cover all processing, logistics and recycling of EDC, VCM and PVC. The

members will commit that their environmental impact shall be measured, monitored and reduced to meet reference targets and time frames which will be determined periodically by the AVC Steering Committee, but which we expect to be similar to the ECVM Charter.

Likewise, the **Australian PVC industry** set up in 2002 a [Product Stewardship Commitment](#) which includes some commitments on production and storage at least as demanding as the ECVM Charter. If there are any doubts the issue can be referred to the VinylPlus [Scheme Council].

e. Calculating the “Enabling Fee”

VinylPlus fees inside the PVC resin manufacturers association ECVM are determined by dividing the total ECVM contribution to VinylPlus into “units” for each member, proportional to its PVC nominal production capacity. One unit corresponds to a portion of capacity of 50 kilotons/y. If the nominal capacity of any member remains below 50 kt/y, a minimum of one unit will be attributed. Otherwise the number of units of each member corresponds to the closest higher integer number resulting from the division of the nominal capacity (in kt/y) divided by 50. So, if for example the annual budget of ECVM (The funding body for VinylPlus is in fact called ECVM 2010) for VinylPlus is “500” and the total of the units of ECVM members is “50”, each unit means a fee of “10” for the year. A review of the nominal production capacities is carried out when appropriate by an independent body, on a confidential basis.

Non-ECVM members supplying PVC resin to a product label applicant have to pay an 'enabling fee' to also contribute financially to the VinylPlus program. The fee is collected by VinylPlus prior to the charter audit and then annually for the duration of the label.

It is calculated as follows:

The amount of annual volume sold by a Non ECVM member to the product label applicant shall be classified in “units” (one unit is 50 kt) in line with the above funding rules of ECVM. If the volume sold is below 50 kt, a minimum of one unit is attributed. Otherwise the number of units will correspond to the closest higher integer number resulting from the division of the annual volume sold to the applicant in kt divided by 50. The fee per unit will therefore be the same as the one paid by ECVM members in the same year, contributing to VinylPlus. If several applicants are supplied by the same non-ECVM member, this non-ECVM member has to pay one single enabling fee based on the total volume supplied to all these applicants.

Paying an 'enabling fee' will confer no rights to the said resin manufacturer for using the VinylPlus logo, participating in the governance of VinylPlus, attending VinylPlus meetings and conferences, or any other right conferred by the full ECVM membership otherwise. Should the audited company / plant be able to deliver sound evidence to the auditor that PVC sourced from non-ECVM members is only used for products that are not part of the label application, these volumes will be disregarded for proving compliance with 5.1.

For both ECVM and non-ECVM suppliers, if the applicant can present evidence that changes in resin supply sources have been decided and will allow fulfilment of the criteria in clause 5.1 from the time the label will be used, the auditor may consider that the resin supply clause is respected, but will then carry out a control check and ask for documentation no later than 6 months after the label audit has been completed. In addition, internationally traded volumes up to 1 kt per applicant will not trigger the payment of an enabling fee. Likewise, PVC compounds purchased up to 1 kt/year will not be subject to clause 5.1.

- f. The optional elements in 5.1.b are *voluntary* commitments made by the resin suppliers. The use of a mercury-free technology to produce chlorine is not awarded with extra points as the mercury cell technology can no longer be legally used in Europe in the European chlor-alkali units since 11 December 2017 (Article 3(12) of the Directive 2010/75/EU on Industrial Emissions).

## 6. VinylPlus Challenge 3 – Sustainable use of Additives

### 6.1 Use of additives in the assessed product

- a. Evidence must be produced by the company being evaluated which demonstrates that the product, the product group or the product system which is being evaluated does not contain cadmium or lead. This requirement excludes any of these materials included within any recycled material used in the manufacture, in so far as re-use of such materials is permitted (understood here in a purely legalistic way) by EU regulation. Appropriate evidence to confirm this could be the product formulation ('recipe') or a list of additives purchased for use in the production process. In case of doubt, VinylPlus can organize an independent and confidential external verification of the additives used.

#### For additional credits

- b. VinylPlus members are expected to follow these guiding principles in a generic way. The compliance of the product / company with all other requirements under VinylPlus will be regarded as sufficient evidence to grant at least 1 credit point if specific data for this point cannot be presented.

"Permanent information": printed material, sticker, bar code, links, that help users trace the additives contained in the product.

"Measures the levels.": the company controls such levels, no fixed frequency needed.

"Provides information": information to help customers install, maintain and treat end of life in the best sustainable way, beyond only additive use.

- c. An updated "candidate list" and a "list of products on Annex XIV" is available on the relevant ECHA web pages:

<https://www.echa.europa.eu/web/guest/candidate-list-table>

and

<https://www.echa.europa.eu/authorisation-list>

The VinylPlus product label (following level 6.1.a. as a compulsory element) can in principle be granted to a product manufactured with an additive that is on the candidate list or on Annex XIV and authorized under REACH in terms of the compulsory level. For any further credit points under section c. however products should not be concerned by any REACH regulation, except as included in recycles.

It is permitted that VOC emission analysis can be delivered also through an industry association.

- d. The VinylPlus Additive Task Force has worked out an advanced concept regarding the Sustainable Use of Additives. The ASF (Additive Sustainability Footprint) allows converters to assess their current sustainability performance over the product life cycle and develop plans together with their suppliers and customers to further improve their scoring. This ASF can also be developed by any European industry sector association in a more general format and does not have to be company specific.

Definition of the term: "Key additives" - [see Appendix](#).

[ASF presentation and general outline](#) is included.

## 7. VinylPlus Challenge 4 – Sustainable Energy and Climate Stability

### 7.1 Greenhouse gas emission reduction / improving energy efficiency

An **energy efficiency policy document** is presented and accepted as evidence by the auditor. The policy document must be approved by the organisation's senior management (i.e. signed and dated by the Company Chairman or a relevant Board Member). Alternatively, a binding document of the European Association to which the company belongs, can be presented as evidence. The policy document must include relevant metrics for measuring performance in relation to energy efficiency and greenhouse gas emissions. **Self-produced** energy should also be included in the policy and metrics.

#### For additional credits

- a. Additional documents can be presented at the audit which identify specific energy efficiency improvements being undertaken by the organisation. These documents must identify quantifiable improvement targets for the company or industry associated with these improvements. Performance against these targets must be monitored regularly.
- b. The term reporting to stakeholders means that energy efficiency reporting is made freely available to anybody, ideally through e.g. website-based reporting or regular (annual) reports made available to all. Any verification must be made by independent third-party bodies.
- c. VinylPlus is proposing a common energy reduction programme for converters using **Europlastvoltage**. If the company can demonstrate full participation in that programme either directly or via their association, then scoring of a) through to d) is confirmed.

### 7.2 Use of renewable energy resources

- a. The organisation being evaluated must present to the auditor **evidence from its energy supplier** concerning the **proportion of renewable energy and green energy** supplied to the company. The categories of energies that can be considered as renewable within our scheme, are those as defined in Chapter 5 of Annex B of the EU Regulation 1099/2008 on Energy Statistics. Hydropower is considered as a renewable energy in the framework of the scheme. Carbon Trading activities will not be considered to be equivalent to renewable or green energy.
- b. See figures for the [national averages of renewable or green energy](#).

### 7.3 Transport impacts

- a. A **transport policy document** is presented and accepted as evidence by the auditor. The policy document must be approved by the organisation's senior management (i.e. signed and dated by the Company Chairman or a relevant Board Member). The policy document must include relevant metrics for measuring performance in relation to transport **BOTH to the factory (from suppliers) AND from the factory (to customers)**.
- b. In many cases companies seeking evaluation will not have their own fleet of vehicles for delivering products to customers, they will use specialised hauliers. This is not a reason to abdicate responsibility over seeking improvements. Evidence can be sought through close cooperation with such transport service providers. The main suppliers and the companies' transportation service providers can be asked to provide the relevant evidence which is a basis for an **improvement plan**. Examples of such evidence of improvement can include:
  - policies about driver education
  - eco efficiency of truck fleet
  - switch from roads to rail or water
  - maximize loads

- eliminate empty returns
- c. The term **reporting to stakeholders** means that transport reporting is made freely available to anybody, ideally through e.g. website-based reporting or regular (annual) reports made available to all. Any **verification** must be made by independent third-party bodies.

#### 7.4 Lifecycle assessment (LCA) and Environmental Product Declarations (EPDs)

- a. Examples of **suitable EPDs/LCAs**:

[Environmental Declaration PVC-U Windows Double Glazing](#)

[Environmental Declaration PVC-U Windows Triple Glazing](#)

Suitable EPDs /LCAs can be provided either by the company being evaluated or by a relevant association.

### 8. VinylPlus Challenge 5 – Sustainability Awareness

#### 8.1 Demonstrating commitment

- a. A **policy document** for employee learning and development, and for awareness raising in the value chain and with local stakeholders, must be presented and taken in evidence by the auditor. The policy document must be approved by the organisation’s senior management (i.e. signed and dated by the Company Chairman or a relevant Board Member). The policy document must include relevant metrics for measuring performance in relation to these factors. Appropriate areas where metrics can be developed can include:
- hrs training per employee
  - number of development reviews
  - numbers of meetings with local organisations
  - features in company newspaper
  - record of appropriate education initiatives around VinylPlus (e.g. ‘Toolbox Talks’)
  - direct interview/communication e.g. at personal development reviews
  - the full range of possible activities outlined within 1.1c above and figures for the [national average of renewable or green energy](#), can also be used to generate metrics
- b. An **example complaint record** is available for viewing in [the Appendix](#). A system must be in place by the end of the audit where complaints from local communities can be recorded and resolved.

#### For additional credits

- c. Additional documents can be presented at the audit which identify **specific objectives and targets** in relation to employee learning and development, and awareness raising in the value chain and with local stakeholders which are set by the organisation. These documents must identify **quantifiable targets** for the company. Performance against these targets must be monitored regularly.
- d. The term **reporting to stakeholders** means that reporting of achievements against the objectives and targets noted in c. above for employee learning and development, and awareness raising in the value chain and with local stakeholders is made freely available to anybody, ideally through e.g. website-based reporting or regular (annual) reports made available to all. Any **verification** of this information must be made by independent third-party bodies.

## APPENDICES

	<b>VinylPlus Product Label</b> <b>Criteria 1.1.b - Integration of VinylPlus into company life – Living your partnership</b>
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1. Use / distribute the VinylPlus progress report / promotion material
2. Show the partnership certificate inside your company / to customers
3. Show VinylPlus partnership roll up banner (entrance door / fairs)
4. Inform and train sales organization to “sell” VinylPlus partnership
5. Promote VinylPlus to retailers, end users and procurement officials
6. Use VinylPlus logo on your webpage, documents, invoices, brochures
7. Create a VinylPlus link on your website
8. Have a dedicated section on website o.a. on sustainability and VinylPlus
9. Participate in VinylPlus working groups
10. Use VinylPlus to build your sustainability image / local community
11. Build / support a local / national network for political dialogue
12. Demonstrate your social responsibility policy containing VinylPlus
13. Visit the annual VSF (Vinyl Sustainability Forum)
14. Encourage business partners (suppliers, competitors, customers) to also join and support VinylPlus
15. Use “day to day” recycled PVC solutions from VinylPlus partners like office supply, stationary, building products, construction, renovation,
16. Translate the VinylPlus recycling targets (800 kt overall in Europe) to your company / your industry association. “We stand for...”, “We recycle X % of the VinylPlus volumes” “Our target is...” o.a.
17. Communicate Your annual VinylPlus support investment to customers
18. Cooperate with others, build a consortium, apply for co-funding from VinylPlus for technical, recycling, research, and communication projects
19. Create and promote controlled material loops with your customers
20. Follow the value selling concept for recycling solutions, ask the same or even a premium price for products containing recycling.
21. Run employees through a documented learning process around sustainability (TNS system conditions) and what it means for you.

### **Scoring table**

<b>Up to 5 elements out of 20</b>	<b>1 credit point</b>
<b>6 to 15 elements</b>	<b>2 credit points</b>
<b>More than 15 elements</b>	<b>3 credit points</b>

	<b>VinylPlus Product Label</b> <b>Criteria 2.1.a Written Responsible Sourcing Policy and Principles</b>
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**Purpose**

This document provides guidance regarding the type of document that needs to be in place with respect to the needs of the Responsible Sourcing Policy element of the label.

This core document can be amended to suit the specific needs and operational requirements of the organisation seeking the label.

The policy should be reviewed regularly and updated as required. It should be signed by a member of the organisation’s senior management team.

<b>Company logo</b>	<b>Responsible Sourcing Policy</b>
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Title  
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Revision Nr.  
Date:  
Page:

**Background**

The aim of [Company Name] is to ensure that the constituent materials used within the delivery of services and products to our clients are responsibly sourced in accordance with the guidelines set out under the VinylPlus Label.

The organisation will operate/undertake the following to demonstrate compliance with the needs of the label:

**Commitment to VinylPlus**

Demonstrate an ongoing commitment to the principles and practices encouraged by VinylPlus through ongoing membership of VinylPlus and active participation in its activities.

**Ethics**

Recognise the need to adopt and apply standards of ethical behaviour appropriate to the purpose and activities of the organisation.

**Legal compliance**

Comply with all applicable laws and regulations.

**Management systems**

Have systems in place to operate in a legal, efficient and financially sustainable manner with continual improvement in the management of quality, health and safety, the environment and human resources.

**Supply chain management**

Communicate and work constructively with the supply chain to deliver sustainable policies and practices.

**Stakeholder engagement**

Identify stakeholders affected by the activities of the organisation and its supply chains and be responsive to their needs.

**Complaints and prosecutions**

Operate with transparency and record and report all complaints and prosecutions and associated corrective actions.

**Fundamental rights at work**

Respect international norms concerning human rights and labour practices and recognise fundamental rights at work including the abolition of child labour, forced or compulsory labour, the rights of freedom of association and collective bargaining, and the elimination of discrimination.

**Health and safety**

Operate in a responsible manner to protect employees, contractors and visitors.

**Climate change and energy**

Use energy efficiently in the production of materials and products and minimise the emission of greenhouse gases associated with these processes. Reduce fossil fuel consumption and utilise renewable sources of energy.

**Resource use**

Recognise the need to use all materials in the most appropriate and sustainable manner.

**Site stewardship**

Be responsible stewards of sites used by preventing pollution and recognising the importance of national heritage, ecological value and biodiversity during use and after the end of life of each site.

**Water**

Use water efficiently to minimise demand on potable water supplies, and treat process water and site run-off effectively to mitigate against pollution risks.

**Waste management**

Manage all waste streams effectively by adopting the waste reduction hierarchy and minimise waste incinerated and disposed of to landfill without energy or material recovery.

**Transport impacts**

Recognise the social and environmental impacts of transportation and the need to adopt appropriate strategies to reduce adverse impacts.

**Employment and skills**

Continue to support sustainable communities by providing employment and economic activity through fair operating practices, and recognise the importance of developing a skilled and competent workforce.

**Local communities**

Liaise effectively with the local community and strive to develop mutual understanding and respect.

**Contribution to the built environment**

Develop products that improve the quality and sustainability of the built environment.

Signed: \_\_\_\_\_ [e.g.] Managing Director, [Company Name]

Date: \_\_\_\_\_

	<b>VinylPlus Product Label</b> <b>Criteria 2.4.e ILO Declaration on Fundamental principles and Rights at Work</b>
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## Background

This document provided background information on the *ILO Declaration on Fundamental Principles and Rights at Work*. It is a companion document to the document VinylPlus Label Guidance Document 2.4a – *Risk Assessment Around non-EU/OECD Suppliers*. The ILO declaration is a fundamental means of assessing in any supplier risk assessment whether fundamental worker’s rights are being respected.

## General Description

Adopted in 1998, the Declaration commits Member States to respect and promote principles and rights in four categories, whether or not they have ratified the relevant Conventions.

These categories are:

- Freedom of association and the effective recognition of the right to collective bargaining
- The elimination of forced or compulsory labour
- The abolition of child labour, and
- The elimination of discrimination in respect of employment and occupation

In more detail the principles and rights are:

The Declaration makes it clear that these rights are universal, and that they apply to all people in all States - regardless of the level of economic development. It particularly mentions groups with special needs, including the unemployed and migrant workers. It recognizes that economic growth alone is not enough to ensure equity, social progress and to eradicate poverty.

This commitment is supported by a Follow-up procedure. Member States that have not ratified one or more of the core Conventions are asked each year to report on the status of the relevant rights and principles within their borders, noting impediments to ratification, and areas where assistance may be required. These reports are reviewed by the Committee of Independent Expert Advisers. In turn, their observations are considered by the ILO's Governing Body.

### 1 - Freedom of association and the effective recognition of the right to collective bargaining

*Relevant ILO Conventions (with hyperlinks)*

[C87 Freedom of Association and Protection of the Right to Organise Convention, 1948](#)

[C98 Right to Organise and Collective Bargaining Convention, 1949](#)

The freedoms to associate and to bargain collectively are fundamental rights. They are rooted in the ILO Constitution and the Declaration of Philadelphia annexed to the ILO Constitution. Their core value has been reaffirmed by the international community, notably at the 1995 World Summit on Social Development in Copenhagen and in the 1998 ILO Declaration on Fundamental Principles and Rights at Work.

These enabling rights make it possible to promote and realize decent conditions at work. The ILO Declaration on Social Justice for a Fair Globalization, adopted in 2008, noted that freedom of association and the effective recognition of the right to collective bargaining are particularly important to the attainment of all ILO strategic objectives.

Strong and independent workers’ and employers’ organizations, and the effective recognition of their right to engage in collective bargaining, are major tools for labour market governance. Collective bargaining is a way of attaining beneficial and productive solutions to potentially conflictual relations between workers and

employers. It provides a means of building trust between the parties through negotiation and the articulation and satisfaction of the different interests of the negotiating partners. Collective bargaining plays this role by promoting peaceful, inclusive and democratic participation of representative workers' and employers' organizations.

The continuing importance of collective bargaining in the twenty-first century derives from its potential as a powerful tool for engagement between employers' and workers' organizations to address economic and social concerns. It can strengthen weak voices and reduce poverty and social disadvantage. This can be done by applying collective bargaining to the needs of the parties and promoting voluntary agreements that sustain the well-being of individuals and enterprises.

The recognition of the right to collective bargaining is the key to the representation of collective interests. It builds on freedom of association and renders collective representation meaningful. Collective bargaining can play an important role in enhancing enterprise performance, managing change and building harmonious industrial relations.

Collective bargaining, as a way for workers and employers to reach agreement on issues affecting the world of work, is inextricably linked to freedom of association. The right of workers and employers to establish their independent organizations is the basic prerequisite for collective bargaining and social dialogue. The right to strike has been recognized internationally as a fundamental right of workers and their organizations and as an intrinsic corollary to the right to organize. Nevertheless, these fundamental rights are still not enjoyed by millions around the world, and where these rights are recognized, there continue to be challenges in applying them. In some countries certain categories of workers are denied the right of association, and workers' and employers' organizations are illegally suspended or their internal affairs are subject to interference. In extreme cases trade unionists are threatened, arrested or even killed.

The exercise of the rights to freedom of association and collective bargaining requires a conducive and enabling environment. A legislative framework providing the necessary protections and guarantees, institutions to facilitate collective bargaining and address possible conflicts, efficient labour administrations and, very importantly, strong and effective workers' and employers' organizations, are the main elements of a conducive environment. The role of governments in providing for an enabling environment is of paramount importance.

## **2 - Elimination of all forms of forced or compulsory labour**

*Relevant ILO Conventions (with hyperlinks):*

[C29 Forced Labour Convention, 1930](#)

[C105 Abolition of Forced Labour Convention, 1957](#)

Economic circumstances can compel people to barter away their freedom, and labour exploitation can occur in many forms. But forced labour (to use a short comprehensive term) is something quite distinct. It occurs where work or service is exacted by the State or individuals who have the will and power to threaten workers with severe deprivations, such as withholding food or land or wages, physical violence or sexual abuse, restricting peoples' movements or locking them up.

For example, a domestic worker is in a forced labour situation where the head of a household takes away identity papers, forbids the worker to go outside and threatens him or her with, for instance, beatings or non-payment of salary in case of disobedience. The domestic may also work for an unbearably low wage, but that is another matter. If he or she were free to leave, this would not amount to forced labour - but to exploitation.

Another example of forced labour arises where villagers, whether they want to or not, have to provide substantial help in the construction of roads, the digging of irrigation channels, etc., and where government administrators, police officers or traditional chiefs brandish a credible menace if the requisitioned men, women or children do not turn up.

Bonding workers through debts is, in fact, a widespread form of forced labour in a number of developing countries. Sometimes it originates with a poor and illiterate peasant pledging labour services to an intermediary or a landowner to work off a debt over a period of time. Sometimes the obligation is passed on from one family member to another, even down to children, and from one generation to another. The labour service is rarely

defined or limited in duration, and it tends to be manipulated in such a way that it does not pay off the debt. The worker becomes dependent on the intermediary or on the landowner and labours in slave-like conditions. The threat and, indeed, the occurrence of violence or other penalties for failing to work turns an economic relationship - one-sided as it is to start with - into a forced labour situation.

Labour trafficking can give rise to forced labour. One way in which traffickers tend to put themselves into a threatening position is to confiscate the identity papers of the person they move for employment purposes. Another is to entrap their charges through cash advances or loans. Traffickers may also resort to kidnapping, notably of children. At any rate, traffickers, the persons linked to them or the employers at the point of destination give their victims no choice as to what work to perform and under which conditions. Intimidation can range from revealing the victim's illegal status to the police, to physical assault and sexual abuse.

The ILO Declaration on Fundamental Principles and Rights at Work obliges member States to eliminate forced labour. A work relationship should be freely chosen and free from threats.

Countries may have definitions of forced labour that are more comprehensive than the ILO's. The ILO sets minimum standards that fix the bottom line below which individual countries should not fall, but they can naturally achieve higher standards of protection of workers.

### **3 - Effective abolition of child labour**

*Relevant ILO Conventions (with hyperlinks):*

[C138 Minimum Age Convention, 1973](#)

[C182 Worst Forms of Child Labour Convention, 1999](#)

Children enjoy the same human rights accorded to all people. But, lacking the knowledge, experience or physical development of adults and the power to defend their own interests in an adult world, children also have distinct rights to protection by virtue of their age. One of these is protection from economic exploitation and from work that is dangerous to the health and morals of children or which hampers the child's development.

The principle of the effective abolition of child labour means ensuring that every girl and boy has the opportunity to develop physically and mentally to her or his full potential. Its aim is to stop all work by children that jeopardises their education and development. This does not mean stopping all work performed by children. International labour standards allow the distinction to be made between what constitutes acceptable and unacceptable forms of work for children at different ages and stages of development.

The principle extends from formal employment to the informal economy where, indeed, the bulk of the unacceptable forms of child labour are to be found. It covers family-based enterprises, agricultural undertakings, domestic service and unpaid work carried out under various customary arrangements whereby children work in return for their keep.

To achieve the effective abolition of child labour, governments should fix and enforce a minimum age or ages at which children can enter into different kinds of work. Within limits, these ages may vary according to national social and economic circumstances. The general minimum age for admission to employment should not be less than the age of completion of compulsory schooling and never be less than 15 years. But developing countries may make certain exceptions to this, and a minimum age of 14 years may be applied where the economy and educational facilities are insufficiently developed. Sometimes, light work may be performed by children two years younger than the general minimum age.

Types of work now dubbed "the worst forms of child labour" are however totally unacceptable for all children under the age of 18 years, and their abolition is a matter for urgent and immediate action. These forms include such inhumane practices as slavery, trafficking, debt bondage and other forms of forced labour; prostitution and pornography; forced recruitment of children for military purposes; and the use of children for illicit activities such as the trafficking of drugs. Forms of dangerous work that can harm the health, safety or morals of children & subject to national determination, by government in consultation with workers' and employers' organisations.

In any effective strategy to abolish child labour, provision of relevant and accessible basic education is central. But education must be embedded in a whole range of other measures, aiming at combating the many factors,

such as poverty, lack of awareness of children's rights and inadequate systems of social protection that give rise to child labour and allow it to persist.

#### **4 - Elimination of discrimination in respect of employment and occupation**

*Relevant ILO Conventions (with hyperlinks):*

[C100 Equal Remuneration Convention, 1951](#)

[C111 Discrimination \(Employment and Occupation\) Convention, 1958](#)

Discrimination at work can occur in many different settings, from high-rise office buildings to rural villages, and in a variety of forms. It can affect men or women on the basis of their sex, or because their race or skin colour, national extraction or social origin, religion, or political opinions differ from those of others. Often countries decide to ban distinctions or exclusions and forbid discrimination on other grounds as well, such as disability, HIV status or age. Discrimination at work denies opportunities for individuals and robs societies of what those people can and could contribute.

Eliminating discrimination starts with dismantling barriers and ensuring equality in access to training, education as well as the ability to own and use resources such as land and credit. It continues with fixing conditions for setting up and running enterprises of all types and sizes, and the policies and practices related to hiring, assignment of tasks, working conditions, pay, benefits, promotions, lay-offs and termination of employment. Merit and the ability to do a job, not irrelevant characteristics, should be the guide.

Discrimination in employment or occupation may be direct or indirect. Direct discrimination exists when laws, rules or practices explicitly cite a particular ground, such as sex, race, etc. to deny equal opportunities. For instance, if a wife, but not a husband, must obtain the spouse's consent to apply for a loan or a passport needed to engage in an occupation, this would be direct discrimination on the basis of sex.

Indirect discrimination occurs where rules or practices appear on the surface to be neutral but in practice lead to exclusions. Requiring applicants to be a certain height could disproportionately exclude women and members of some ethnic groups, for example. Unless the specified height is absolutely necessary to perform the particular job, this would illustrate indirect discrimination.

Equality at work means that all individuals should be accorded equal opportunities to develop fully the knowledge, skills and competencies that are relevant to the economic activities they wish to pursue. Measures to promote equality need to bear in mind diversity in culture, language, family circumstances, and the ability to read and to deal with numbers. For peasants and owners of small or family enterprises, especially the women and ethnic groups, equal access to land (including by inheritance), training, technology and capital is key.

In the case of both employees and self-employed or (own-account) workers, non-discrimination at work depends on equal access to quality education prior to entering the labour market. This is of chief importance for girls and disadvantaged groups. A more equal division of work and family responsibilities in the household would also permit more women to improve their work opportunities.

Effective avenues are needed to permit meaningful challenges to discrimination when it occurs. ILO principles fix minimum thresholds. National laws and practices may well be broader and include more comprehensive approaches for the elimination of discrimination at work.

	<b>VinylPlus Product Label</b> <b>Criteria 3.2.a. – Summary of Requirements for an Environmental Management System</b>
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### **Purpose**

The below check list will allow the auditor to validate an Environmental Management System (EMS) as equivalent to ISO 14001:2015. ISO 14001:2015 is the international standard describing the specification and requirements for an EMS. As a minimum, the VinylPlus scheme recognises organisations where the EMS meets the below clauses from ISO14001:2015, even though the system is not certified by an accredited organisation.

### **PLAN**

#### **4.3. Determining the scope of the quality management system, 4.4. Quality Management System**

An organisation must establish, document, implement, and continually improve their environmental management system and show how they meet all the requirements of this standard. The organisation defines the scope of the EMS, i.e. the boundaries of the organisation to which the EMS applies.

#### **5.1. Leadership and commitment, 5.3. Organizational roles, responsibilities and authorities**

ISO 14001 requires that the relevant management and accountability structure be defined in this element. Top management is expected to ensure that resources are available so that the EMS can be implemented, maintained, and improved. These resources include human resources, organisational structure, financial and technological resources, and others as needed.

Roles, responsibilities, and authorities must be defined, documented and communicated as appropriate.

The organisation must denote the Management Representative who is responsible to oversee the EMS and report to management on its operation. This person(s) ensures that the EMS is established, implemented and maintained consistent with ISO 14001:2015, and also reports to top management on the performance of the system including recommendations for improvement.

#### **5.2. Environmental Policy**

The organisation must have a policy, or commitment statement, developed by top management relative to the scope of the EMS that conforms to the standard. This is generally a short statement that drives the remainder of the EMS. There are specific items that must be committed to in the policy, such as compliance with legal and other requirements, prevention of pollution, and continual improvement. In addition, the policy must be communicated to all employees, and others working on behalf of the organisation, and be available to the public. The policy provides a framework for reviewing objectives and targets and be appropriate to the nature and scale of the entity included in the scope. This policy must be documented, implemented, and maintained. This means that it is kept current through the EMS review and continual improvement process, and is implemented through the remainder of the EMS elements.

#### **6.1.2. Identification of environmental hazards, 6.1.4. Determining significant environmental aspects and organizational risks and opportunities**

These elements require a procedure to identify environmental aspects and related impacts that the organisation can control or have influence over, and determine those which are significant to the organisation. ISO 14001:2015 does not prescribe what aspects should be significant, or even how to determine significance. However, it is expected that a consistent and verifiable process is used to determine significance.

Aspects are defined as how an organisation's activities products and/or services interact with the environment. An impact is how an aspect changes the environment. The intent of this element is to help the organisation identify how it affects the environment, prioritize aspects, and use the EMS to manage, control, and improve upon the aspects. So the organisation must ensure that the significant aspects are taken into account in the EMS.

In order to ensure that the system is continually improving and current, this information must be kept up to date.

#### **6.1.3. Determination of compliance obligations**

This is a requirement for a procedure that explains how the organisation obtains information regarding its legal and other requirements, and makes that information known to key functions within the organisation.

The intent of this element is to identify the environmental legal and other requirements that pertain to its operations and activities so that the organisation can ensure that they are taken into account in the EMS. In doing so, the organisation must also determine how these requirements apply to the significant aspects.

## **6.2. Environmental objectives and planning to achieve them**

There is no requirement for a procedure in this element. However, there must be some process that ensures that the objectives and targets are consistent with the policy, which includes the commitments to compliance with legal and other requirements, continual improvement, and prevention of pollution. Also, the organisation must take into consideration significant aspects, legal and other requirements, views of interested parties, and technological, financial, and business issues when deciding what it wishes to accomplish as an objective. The objectives and targets need to exist at whatever functions and levels of the organisation, and be measurable, where practicable.

## **DO**

### **7.2. Competence, 7.3. Awareness**

The key point in these elements is to ensure that persons performing tasks that have or can have significant impact on the environment and/or relate to the legal and other requirements are competent to do those tasks. Competence is ensured through appropriate education, training, and/or experience.

The organisation needs to identify training needs as they relate to the EMS, the significant aspects, and the legal and other requirements and make sure this training is provided (records of such are to be maintained). A procedure is needed that makes sure such persons are: aware of the need to conform with all EMS procedures and requirements and what they specifically need to do to do so; the significant aspects and the legal and other requirements associated with their respective responsibilities and why improved performance is beneficial; and the consequences of not following these procedures and requirements. In addition to job-specific knowledge, it is expected that all personnel within the EMS (including contractors) have general awareness on items such as the policy and emergency response.

### **7.4. Communication**

Procedures are required for both internal and external communications. Note that ISO 14001:2015 only requires procedures, and allows the organisation to decide for itself the degree of openness and disclosure of information. Whatever the decision is in terms of disclosure, the decision process must be recorded. There is a specific requirement that the organisation considers external communications about its significant environmental aspects and records its decision.

For internal communications, the procedure needs to describe how it is done among the levels of the organisation. For external communications, it has to describe how external communications are received, documented, and a response provided.

### **7.5. Documented information**

This requirement ensures that the organisation has documented the system in either electronic or paper form such that it addresses the elements of the standard, describes how the organisation conforms to each element, and provides direction to related documentation. Not all ISO 14001-required procedures need to be documented, as long as the system requirements can be verified. However, documentation must be provided such that enough is available to ensure the effective planning, operation, and control of processes related to the significant aspects, and to demonstrate conformance to ISO 14001:2015. Such documentation at a minimum includes policy, objectives and targets, a definition of the scope of the EMS, and other main elements.

#### **7.5.2. Creating and updating, 7.5.3. Control of documented information**

The organisation is required to control documents, such as system procedures and work instructions, to ensure that current versions are distributed and obsolete versions are removed from the system. There is a requirement for a document control procedure that ensures documents are approved prior to use, are reviewed and updated as necessary, changes to versions are identified, that the current versions are available at points of use, that they are legible, identifiable, and that obsolete ones are so noted to avoid unintended use. It is acceptable to use documents of internal origin in the EMS, but those must be identified as being essential to the EMS and their distribution controlled.

#### **7.5.3. Control of documented information**

Records are expected to exist to serve as verification of the system operating and the organisation's conformance to the standard and its own EMS requirements. Procedures in this element are required for the

maintenance of records, and specifically require that records are identifiable, retrievable, safely stored, and legible, retained as appropriate, and traceable.

### **8.1. Operational Planning and Control, 8.2. Value chain control**

For these elements, critical functions related to the policy, significant aspects, the legal and other requirements, and objectives and targets are identified and procedures and work instructions are required to ensure proper execution of activities. Requirements for communicating applicable system requirements to contractors also need to be addressed in these procedures.

The required procedures need to provide instruction such that the organisation conforms to the policy, objectives and targets, the legal and other requirements, and addresses any impacts from significant aspects. Which procedures are needed can be determined by review of the significant aspects, objects and targets, the legal and other requirements, and policy and then deciding what must be documented to ensure that deviations from planned arrangements do not occur.

In regard to contractors, the organisation will need to establish procedures related to the significant aspects the legal and other requirements, of the goods and services it uses, and communicating the relevant elements of those procedures to the suppliers and contractors.

### **8.3. Emergency preparedness and response**

Although typically addressed through conventional emergency response plans, this element also requires that a process exist for actually identifying the potential emergencies, in addition to planning and mitigating them. Emergency incidents include those that may not be regulated, but may still cause significant impact as defined by the organisation.

As part of continual improvement, it is required that the organisation not only responds to emergency situations, but also reviews the emergency procedures and make improvements as necessary. This may involve periodic testing of emergency procedures, if practicable.

## **CHECK**

### **9.1. Monitoring, measurement, analysis and evaluation**

In order to properly manage the system, measurements must be taken of its performance to provide data for action. Procedures are required describing how the organisation will monitor and measure key parameters of operations. These parameters relate to the operations that can have significant impacts, to monitor performance towards the objectives and targets, and to monitor conformance to the legal and other requirements and other EMS requirements.

Equipment related to environmental measurements, must be calibrated according to procedures, and records maintained.

#### **9.1.2. Evaluation of Compliance**

The first part of this element requires the organisation to have a procedure to periodically evaluate its compliance with applicable legal requirements as defined in 6.1.3. The organisation will need to keep records of these periodic evaluations. ISO 14001:2015 also requires a similar evaluation for compliance with other requirements.

### **9.2. Internal Audit**

ISO 14001:2015 requires that the system provide for internal audits. This procedure could include methodologies, schedules, checklists and forms, and processes used to conduct the audits. The purpose of this audit is to determine whether the system conforms to the requirements of ISO 14001:2015 and the organisation's own EMS detailed requirements, and if the EMS has been properly implemented and maintained. The procedure for internal audits has to address responsibilities and requirements for planning and executing the audits, reporting results, and what records will be generated (and maintained in accordance with 7.5.3.). The procedures also address determination of audit scope, how often they will be conducted, and specifically how they will be done.

Auditors need to be selected such that it ensures objectivity and impartiality of the audit process.

### **9.3. Management Review**

This element requires that periodically, top management will review the EMS to ensure it is operating as planned, and is suitable, adequate, and effective. The organisation needs to ensure that in the review: results of internal audits (EMS and compliance); external communications; environmental performance; status on

objectives and targets; status of corrective and preventive actions; follow up on actions from prior management reviews; and changing conditions or situations; and recommendations for improvement are all discussed. Results and records of management review include: agendas, attendance records, minutes, and documented agreed upon action items.

## **ACT**

### **10.1. Nonconformity and corrective action, 10.2. Continual improvement**

These elements require procedures for acting on non-conformances identified in the system, including corrective and preventive action. A non-conformance is a situation where the actual condition is not in accordance with planned conditions. Someone not following a procedure, a regulatory non-compliance, or an incident, are all examples of possible systemic non-conformances. Non-conformances may be identified through audits, monitoring and measurement, and communications. The intent is to correct the system flaws by addressing root causes, rather than just fixing the immediate incident only. The standard also requires that trends in corrective actions be evaluated to see if deeper-rooted preventive actions can also be implemented. The procedure needs to make sure the non-conformances are not only first addressed to mitigate environmental impact; but that further investigation occurs to determine their cause, and action taken to avoid it happening again. Preventive actions would then be those actions resulting from an evaluation as to why nonconformities are occurring and taking action to prevent their recurrence. The standard states that the corrective action is appropriate to the magnitude of the problem and the impacts encountered; to avoid either over-compensating or under-compensating for a problem.

The organisation must record the results of corrective actions taken, and must also review the effectiveness of actions taken.



## VinylPlus Product Label

### Criteria 4.3. Steps of organisations to design products for reuse/recycling

- Reuse and recycling is a clear priority for R+D in creating new products
- Internal meetings can be documented that show the topic is on the agenda, actions are taken, progress is made
- Controlled loop or closed loop concepts are developed with customers
- **The company participates in industry recycling schemes**
- The company develops products / systems where a max of components are made from PVC to allow recycling
- The company develops products / systems that allow a very quick dismantling / separation of components in recycling

**Scoring:**

**Up to 3 steps**

**2 credit points**

**4 to 5 steps**

**3 credit points**

**More than 5 steps**

**4 credit points**

<b>Matrix PVC resin suppliers</b>						Update AS	24.01.2018
<b>Criteria scheme 5.1. a and b / auditors guide</b>							
Compulsory			Credit points				
Resin manufacturer name	Member of ECVM and Vinylplus partner (x)	Follows the ECVM charters	No mercury technology used for chlorine source	Reports in line with Eurochlor Sustainability programme	Reports emissions EDV/VCM/Dioxins	Monitors and influences the disposal of the assessed product end of life	
Anwil		?	x	x		(d)	
Borsodchem		x	x	x		(d)	
Ercros	x	x	x	x	x	(d)	
Inovyn	x	x	x	x	x	(d)	
Kem One		?	x	Expected 2018		(d)	
Fortischem		?				(d)	
Shin-Etsu	x	x	x	(b)	x	(d)	
Spolana		x	x	?		(d)	
Vestolit	x	x	x	x	x	(d)	
Vinnolit	x	x	x	x	x	(d)	
Vynova	x	x	x	x	x	(d)	

(?)	<b>to be verified by a technical audit every 2 years</b>					
(b)	Via its chlorine supplier Akzo-Nobel					
(c)	Depends on manufacturing site - Need self declaration					
(d)	Information not available at ECVM - Need self declaration					

An "Equivalent Scheme" of the ECVM Charters:

the PVC producers in the ASEAN region have set up an organisation called AVC (Asean Vinyl Council). They have also decided to set up an "AVC Environmental Voluntary Standard" following the model of the ECVM Charter. The formal announcement has been postponed, but some principles are already agreed, i.e. that it will cover all processing, logistics and recycling of EDC, VCM and PVC. The members will commit that their environmental impact shall be measured, monitored and reduced to meet reference targets and time frames which will be determined periodically by the AVC Steering Committee, but which we expect to be similar to the ECVM Charter.

Likewise, the Australian PVC industry set up in 2002 a [Product Stewardship Commitment](#) which includes some commitments on production and storage at least as demanding as the ECVM Charter.

This shows that an "equivalent" alternative of the ECVM Charter exists already and that a second one is expected.

### **Definition and Threshold: What we consider a “Key Additive”**

“An Additive (assessed through the ASF system) is a chemical substance added to the PVC resin during its processing (compounding, extrusion, calendaring, moulding, etc..), to enable the processing to occur; and also, to offer to the final article specific performances and/or cost. Additives assessed through ASF typically include: stabiliser and co-stabilisers, lubricants, plasticisers, impact modifiers, processing aids, pigments and fillers. They don't include other materials (such as gaskets, reinforcing components, etc..) which are already considered into the article's EPD.”

Note: This list is not including 100% of the additives used in all the many PVC applications. It could happen that tomorrow, while assessing other end uses, other additives might be included (extenders, viscosity modifiers, biocides, etc....). However, the ones listed above are ok for most of the main applications.

The threshold level, over which an additive has to be considered as a "key" one:

“Any chemical substance included into the above additive classes, incorporated into a PVC article or compound at a concentration above 0.3 phr (parts per hundred of PVC), unless included into the SVHC list or classified as CMR Cat 1a or 1b, or PBT, or of an equivalent level of concern (in which case, the threshold will become 0.1%, coherently with REACH).”

Note: the proposed threshold of 0.3 phr corresponding to an average of about 0.2% into an article means, in the case of a stabiliser, to evaluate each of its components representing at least 5% of the entire stabiliser - unless representing an issue in terms of its toxicologic profile, hence the 0.1% threshold proposed for this case).



**VinylPlus Product Label  
Criteria 8.1.b Local Community Complaint Report Template**

**Purpose**

This document provides guidance regarding the type of document that needs to be in place with respect to the needs of the local community complaint reporting process element of the label.

This template can be amended to suit the specific needs and operational requirements of the organisation seeking the label.

The template should be reviewed regularly and updated as required.

**Local Community Complaint Report Template**

Company Logo	Local Community Complaint Report Template	Doc No:	
		Revision: No:	
		Date:	
		Page:	- 28 -Page 28 of 30

**Complaint Reference No.:**

<b>Description of Complaint</b>		<b>Date:</b> _____
<b>Complainant's Details:</b>		
<b>Name:</b>		
<b>Address:</b>		
<b>Telephone No:</b>		

<b>Investigation / Evaluation of significance of Complaint</b>		
<b>Name:</b> _____	<b>Signature:</b> _____	<b>Date:</b> _____

Continued...

Action Taken

Name: \_\_\_\_\_ Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Verification of Closure

Name: \_\_\_\_\_ Signature: \_\_\_\_\_ Date: \_\_\_\_\_

## Version Control

Version	Date	Description of change	Person responsible
1.0	Till March 2018	Initial version	S. Eingärtner
1.1	2/10/2018	-Section 2.2.d. added to explain that Checking the legal compliance should include the legal requirements on the <b>upstream raw materials chain</b> -Section 5.1.f. added to explain why a mercury-free technology to produce chlorine is no longer awarded with extra points	V. Stone
1.2	14/1/2019	-Per Accredia's request: <ul style="list-style-type: none"> <li>• Add reference to ISO/IEC 17067 guidelines and type of certification in general notes</li> <li>• Mention that conformity assessment can either be done by BRE or an accredited certification body (list provided by VinylPlus) in general notes</li> <li>• Refer to ISO 9001:2015 in sections 2.3.a., 2.3.c., 3.1.b</li> <li>• Refer to ISO 14001:2015 in sections 3.2.b., 3.2.c., 3.2.d.</li> <li>• Add in section 3.2.b, a link to an Appendix explaining the principles to be followed by an equivalent EMS to ISO 14001:2015</li> <li>• Modify Appendix to clause 3.3.a explaining the principles to be followed by an equivalent EMS to ISO 14001:2015</li> <li>• Refer to OHSAS 18001:2007 and ISO 45001:2018 in clause 3.3.c</li> <li>• Clarify that self-produced energy should also be subject to energy efficiency measures and reduction target settings in section 7.1.a</li> <li>• Give reference to the energy sources that can be considered as renewable in section 7.2.a</li> </ul> <p>- Remove in section 3.2.c. sentence "The <a href="#">Appendix</a> provides an updated definition of 'small and developing'." Appendix does not define "small and developing" but the minimum requirements of a EMS.</p> <p>-Update link to Authorization list in section 6.1.c</p>	V. Stone