

VinylPlus® Product Label



Auditor Guidelines Issue 1.3 (January 2020)

The VinylPlus® Product Label is a product certification scheme describing the organizational management, supply chain management and sustainability aspects to be addressed by PVC building and construction products to live up to the commitments of the VinylPlus® voluntary sustainability programme and the responsible sourcing principles defined in BES 6001, the Framework Standard for Responsible Sourcing owned by BRE. Owned by VinylPlus®, the scheme has been developed in collaboration with

Foreword

The requirements of the scheme consist of actions to be taken to demonstrate adoption of the 5 challenges of VinylPlus, the voluntary sustainability programme of the European vinyl supply chain, and of responsible sourcing as defined in BRE's owned BES 6001.

The requirements and associated actions have been structured into eight components:

- VinylPlus partnership – A commitment to sustainable development
- Organisational Management Requirements
- Supply Chain Management Requirements
- VinylPlus Challenge 1 – Controlled Loop Management
- VinylPlus Challenge 2 – Organo-chlorine Emissions
- VinylPlus Challenge 3 – Sustainable Use of Additives
- VinylPlus Challenge 4 – Sustainability Energy and Climate Stability
- VinylPlus Challenge 5 – Sustainability Awareness

Requirements can be demonstrated to be met either by providing manufacturing location-related evidences or product-related evidences. In the below requirement lists, the manufacturing location-related requirements are shown in **green**, the product-related requirements are shown in **blue**. The former type of evidences may well be common to a number of different products and as such need not be repeated when seeking certification of additional products.

This certification scheme can be applied to a **single product**, a **product system** (parent product and a set of child products that represent slight different variations (color, size..) of this parent product) or a **product range** (group of products having at least one attribute in common or complement each other in some way). Certification of for a whole product system or product range only applies when all of the requirements of the scheme are equally met by all the products of a product system or a product range. It may be that all products in a product system or in a product range will **only require a single evaluation** against a common management system and aspects related to the manufacturing location.

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.).

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.

As this scheme matures, VinylPlus® will strive to develop an independently audited **Chain of Custody** scheme to the source of the constituent material(s). Auditing shall be done by 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.

Scoring Methodology

An organisation that meets the requirements of the scheme receives a Certificate Approval and a corresponding Performance Rating for each of the requirements.

The organisation must satisfy all compulsory requirements (C) and may achieve additional levels of

compliance within the non-compulsory requirements of the scheme to achieve a higher performance rating (see below Performance Scoring Table).

Supplementary points are available for some criteria and can be awarded in addition to compulsory points regardless of any/all 'higher performance rating' achieved. For example, in 4.2 Waste management, a supplementary point can be awarded in addition to the compulsory level a) score. Or, a supplementary point can be awarded in addition to the score from b) or the score from c). This approach makes the maximum points available 4.

The organisation should obtain a total of minimum 30 points to get the product(s) or product system(s) certified.

	Requirements	a)	b)	c)	d)	Supplementary points	Maximum number of points
1.1	Integration of the VinylPlus programme into company life	C	1, 2 or 3			1	4
2.1	Responsible sourcing policy	C					0
2.2	Legal compliance	C					0
2.3	Quality management system & operational management of responsible sourcing	C	2				2
2.4	Supplier management system	C					0
3.1	Material traceability through the supply chain	C	1	2			2
3.2	Environmental management systems in the supply chain	C	1	2	3		3
3.3	Health and safety management systems in the supply chain	C	1	2	3		3
4.1	Use of recycled PVC	2	4	6	10		10
4.2	Waste management	C	2	3		1	4
4.3	Product Design for Controlled Loop Material Management	2, 3 or 4					4
5.1	PVC resin used in manufacturing the product	C	2 or 4				4
6.1	Use of additives in the assessed product	C	1 or 2			4, 8 or 12	14
7.1	Greenhouse gas emission reduction	C	3	5			5
7.2	Energy use	1					1
7.3	Use of renewable energy resources	1	2	3	4		4
7.4	Transport impacts	C	2			1	3
7.5	Lifecycle assessment (LCA)	C	2	3			3
8.1	Demonstrating commitment and communication	C	2	3			3
8.2	Local Communities	C	1	2			2
Maximum number of points							71

Requirements

- 1. VinylPlus partnership – A commitment to sustainable development**
 - 1.1 Integration of the VinylPlus programme into company life
- 2. Organisational Management Requirements**
 - 2.1 Responsible sourcing policy
 - 2.2 Legal compliance
 - 2.3 Quality management system
 - 2.4 Supplier management system
- 3. Supply Chain Management Requirements**
 - 3.1 Material traceability through the supply chain
 - 3.2 Environmental management systems in the supply chain
 - 3.3 Health and safety management systems in the supply chain
- 4. VinylPlus Challenge 1 – Controlled Loop Management**
 - 4.1 Use of recycled PVC in the assessed product
 - 4.2 Waste management
 - 4.3 Design for reuse or recycling
- 5. VinylPlus Challenge 2 – Organo-chlorine Emissions**
 - 5.1 PVC resin used in manufacturing the product
- 6. VinylPlus Challenge 3 – Sustainable use of Additives**
 - 6.1 Use of additives in the assessed product
- 7. VinylPlus Challenge 4 – Sustainable Energy and Climate Stability**
 - 7.1 Greenhouse gas emission reduction
 - 7.2 Energy Use
 - 7.3 Use of renewable energy resources
 - 7.4 Transport impacts
 - 7.5 Lifecycle assessment (LCA)
- 8. VinylPlus Challenge 5 – Sustainability Awareness**
 - 8.1 Demonstrating commitment and communication
 - 8.2 Local Communities

APPENDICES

- Criteria 1.1 b) - Integration of VinylPlus into Company Life – Living your Partnership
- Criteria 2.1 a) Written Responsible Sourcing Policy and Principles
- Criteria 2.4 a) ILO Declaration on Fundamental Principles and Rights at Work
- Criteria 3.2 a) – Summary of Requirements for an Environmental Management System
- Criteria 3.3 b) – Summary of Requirements for an Health and Safety Management System
- Criteria 4.2 a) - Waste Policy Template
- Criteria 4.3 a) Steps towards Product Design for Reuse and/or Recycling
- Criteria 5.1 Matrix Status PVC Resin Suppliers
- Criteria 5.1 a) Equivalent Schemes to the ECVI Charters
- Criteria 6.1) VinylPlus definition of Key Additives
- Criteria 8.2 a) Local Community Complaint Report Template

1. VinylPlus partnership – A commitment to sustainable development

1.1 Integration of the VinylPlus programme into company life

- a. In order to demonstrate that the compulsory level is satisfied, a proof of a **valid partnership to VinylPlus**, issued by the Vinyl Foundation for the current year will be required.

For a higher rating

- b. To reach performance level b), **written documents** (e.g. minutes, reports, notes) will be required as evidence to demonstrate activities associated with implementing the VinylPlus associated voluntary commitments and working principles. 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** demonstrating the implementation of the VinylPlus targets is included in the [Appendix](#) below. Not all these activities 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 a first point.
- d. A **supplementary point** can be awarded if the applicant has been a **partner of the Vinyl Foundation for the last 3 years**. Three points should be scored on the key activities described in 1.1.c to secure this supplementary point.

2. Organisational Management Requirements

2.1 Responsible sourcing policy

- a. In order to demonstrate that the compulsory level is satisfied, a formal written **Responsible Sourcing Policy** will be provided as evidence ([see Appendix](#) for guidance on content).
- b. The Policy must be in a form that is **relevant** to the organisation, product, product system or product group under evaluation, 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. In order to demonstrate that the compulsory level is satisfied, the applicant should secure evidence that a **procedure has been established** to identify, update and understand all the applicable legal requirements associated with the production of the product, the product system or the product group 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. In order to demonstrate that the compulsory level is satisfied, the applicant should 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 refers to** the Responsible Sourcing policy described in 2.1a.

For a higher rating

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

2.4 Supplier management system

- a. In order to demonstrate that the compulsory level is satisfied, the applicant should 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** described 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. In order to prepare the conformity assessment for this criteria, a **table** showing a specification of all constituent materials used in manufacture of the product, the product system or the product group which is being evaluated, should be secured as evidence. The table must indicate the source of all the constituents, the proportion of each material as used in the product (as mass or volume) along with relevant traceability data (see 3.1 b. below) for the manufacturer. The term source refers to the description in the standard i.e.:

- The extraction of raw materials
 - the recovery of recycled materials
 - the production of by-products
 - the processing of commodity traded materials
- b. Establish the proportion of constituent materials (by mass or volume) which have eligible evidence of traceability. Traceability to source (as defined in 3.1 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 [Recovinyl](#) documentation

In order to check that the compulsory level is satisfied, check that at least 60% of source materials are traceable through the means described in 3.1 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 [Recovinyl recyclers](#) can be found on the Recovinyl website.

For higher ratings

- d. To reach performance level b) (c)), check that at least 75% (90%) of source materials are traceable through the means described in 3.1 b. to appropriate source organisations. Again, evidence of traceability will be required as above.

3.2 Environmental management systems in the supply chain

- a. In order to prepare the conformity assessment for this criteria, 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, should be prepared with the applicant. The table must indicate the source of all the constituents, the proportion of each material as used in the product (as mass or volume) along with relevant **Environmental Management System (EMS) data** for the manufacturer (see 3.2 b. below). The term source refers to the description in the standard i.e.:
- The extraction of raw materials
 - the recovery of recycled materials
 - the production of by-products
 - the processing of commodity traded materials
- b. In order to check that the compulsory level is satisfied, check that at least 60% of source materials are covered by an EMS that is, as a minimum, **equivalent** to ISO 14001:2015. The system needs not be certified to ISO 14001:2015. The organisation seeking certification for its product, product system or product group **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. Where there is a limited number of suppliers (up to a total of 10 constituent materials), copies of the systems documents from all sources should be provided. If there are more constituent materials, 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 higher ratings

- d. To reach performance levels b), c) or d), check that, respectively at least 60%, 75% or 90% of source materials are covered by valid EMS **certificated by an accredited organisation** and that the organisation seeking certification for its product, product system or product group **also** has an EMS which is **certificated by an accredited organisation**.

3.3 Health and safety management systems in the supply chain

- a. In order to prepare the conformity assessment for this criteria, 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, should be prepared with the applicant. The table must indicate the source of all the constituents, the proportion of each material as used in the product (as mass or volume) along with relevant **Health and Safety Management System (H&SMS) data** for the manufacturer (see 3.3 b. below). The term source refers to the description in the standard i.e.:

- The extraction of raw materials
- the recovery of recycled materials
- the production of by-products
- the processing of commodity traded materials

- b. To check that the compulsory level is satisfied, check that at least 60% of source materials is covered by an H&SMS equivalent to OHSAS 18001:2007 and ISO 45001:2018, which, as a minimum, monitors:

- Near miss incidents
- Time loss accidents
- Fatal accidents

The [Appendix](#) provides a summary of the minimum requirements for a H&SMS equivalent to OHSAS 18001:2007 and ISO 45001:2018.

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

For higher ratings

- c. To reach performance levels b), c) or d), check that, respectively, at least 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**.

4. VinylPlus Challenge 1 – Controlled Loop Management

4.1 Use of recycled PVC in the assessed product

- a. VinylPlus has drafted clear definitions for what may be claimed as recycled PVC in the different product applications (profiles, pipes, flooring, films and sheets, roofing and waterproofing membranes). See [VinylPlus Sector Definitions](#) for more details.
- b. During the onsite audit, the organisation under assessment needs to show to be aware and to understand the **recycling definition** relevant to their product, product system or product group under evaluation. Evidence will be required by the auditor to demonstrate this awareness and understanding.
- c. For earning points on this criteria, evidence demonstrating that the product is manufactured according to a **specification** clearly instructing to use a given mass percentage (%m) of recyclate during production will be provided to the auditor. Depending on the availability of the recyclate, the actual percentage may vary slightly between production lots, but must be kept within a +/-10 % interval around an overall average.
- d. The **recycling percentages** shall be calculated as the quotient of the weight amount of recycled material used and the weight of the net end product. This definition follows ISO 14021:

$$\text{Recycling percentage} = (\text{PVC recyclate} / (\text{virgin PVC} + \text{additives/fillers} + \text{PVC recyclate})) \times 100$$

- e. In order to identify into which percentage band the product, product system or products group falls, the auditor must average the calculated recycling percentages from the production runs **of the last 12 months** prior to the date of the onsite audit.

4.2 Waste management

- a. In order to demonstrate that the compulsory level is satisfied, evidence describing the **waste volumes going to landfill or being incinerated without energy recovery** for the whole company or the audited location (whichever is appropriate for the audit) must be shared with the auditor.
- b. A written **policy document** describing the organisation's approach to **waste management** (particularly the actions taken to divert waste from landfill or incineration without energy recovery) must be provided to the auditor. This policy must be signed by the chairman or a board member. The [Appendix](#) provides guidance regarding the type of document that needs to be in place.
- c. Evidence has to be provided by company that all controlled waste from its operation is stored, transported and treated so as impact on human health and environment is minimized and that all regulatory requirements are fulfilled.

For higher ratings

- d. To reach performance level b), evidence must be provided that waste management is part of a company's reporting scheme to its stakeholders. Appropriate objectives and targets should be set and be regularly reviewed at senior level.
- e. To reach performance level c), the company must provide evidence that the information and data that are communicated to its stakeholders are externally verified. Waste volumes must be certified by **EuCertPlast**, **Recovinyl** or equivalent organisation.
- f. For a **supplementary point** to be awarded, the information and data communicated to the stakeholders should at least specifically covers two from the five following topics: sector

overview of waste production rates and fate information, actions taken to foster post-consumer reuse/recycling/energy recovery of the assessed product, levels of reuse and recycling of the waste produced by the organisation, targeted vs. actual waste reduction rates for the assessed product, staff and supply chain engagement activities promoting behavioural change and the share of best practices.

4.3 Design for reuse or recycling

- a. To earn points on this criteria, the applicant should provide robust evidence on steps taken to design the product, product system or product group under evaluation to ease reuse and/or recycling, or to use higher amounts of PVC recyclates. The [Appendix](#) contains a list of steps that can be used to demonstrate, that reuse/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. Requirement 5.1 may be applied to product systems or product groups made from PVC supplied to a complete manufacturing site.
- b. In order to demonstrate that the compulsory level is satisfied, evidence should be provided proving that the PVC resin have been manufactured according to the requirements of the ECVM Charters. There are 2 Charters which the European PVC industry has committed to in [1995](#) and [1998](#). The Charters deal with emissions during the manufacturing of PVC resin as well as the maximum content of residual monomer in the resin. A new version of the [ECVM Charter](#) has been developed in 2019 and will have to abide by from January 2022 on.
- c. There are 2 ways for the auditor to verify compliance to these Charters. One way is through the current membership status of the supplier to EVCN. Compliance to the Charters is a prerequisite for a PVC producer to be an ECVN member. The other is through the results of a 3rd party technical audit (the “ECVN Charter Audit”) verifying compliance to the above Charters for at least one of the manufacturer’s VCM and PVC manufacturing sites. It is at the auditor's discretion to verify that the production unit to be audited is really a manufacturing site where commercial production takes place. Pilot plants may not be considered as a valid audited site.
- d. 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 ECVN Charters. 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 ECVN Charter. If there are any doubts the issue can be referred to VinylPlus.
- e. A matrix representing the best VinylPlus’ current knowledge on the compliance of the European resin manufacturers to the various compulsory and non compulsory requirements of 5.1 a) and b), is provided [in Appendix](#). Auditors are strongly encouraged to double-check the information reported.

- f. Each PVC resin manufacturer member of ECVM financially contributes to VinylPlus to an amount calculated by sharing the total ECVM's financial contribution into a number of units, proportional to each member's PVC **total** nominal production capacity. One unit corresponds to a total yearly capacity share of 50 kt/y. If the total nominal capacity of an ECVM member remains below 50 kt/y, a contribution of one unit will be requested. If the nominal capacity of a member is above 50 kt/y, the number of units is calculated by rounding up the division of the member's nominal capacity (in kt/y) by 50. If for example, the annual contribution of ECVM to VinylPlus is 500 and total nominal capacity of the members is 2500 kt/y, the total number of units to be shared among for the ECVM members is 50, and each unit will cost 10 for that year. A review of the nominal production capacities is carried out when appropriate on a confidential basis, by an independent body.
- g. Non-ECVM members supplying PVC resin to a VinylPlus Product Label applicant have to pay an enabling fee as financial contribution to the VinylPlus programme. The enabling fee is collected by VinylPlus prior to the first onsite audit and then annually for the duration of the certification. The enabling fee is calculated the same way as for the contribution of the ECVM members, except that only the resin volume *used to manufacture the labelled products* is factored in for the non ECVM members. The amount of annual volume sold by a non ECVM member to the product label applicants to manufacture the labelled products shall be first converted to "units", one unit representing 50 kt/y. If the volume sold by the non ECVM member is below 50 kt/y, a minimum contribution of one unit will be requested. If the volume sold is above 50 kt/y, the number of units is calculated by rounding up the division of the non member's volume (in kt/y) by 50. The unit cost will be the same as the one paid by the ECVM members in the same year but the number of units will be limited to the volume *used to manufacture the labelled products*.
- h. If several label holders are supplied by a same non-ECVM member, this non-ECVM member has to pay to VinylPlus one single enabling fee based on the total volume supplied to all these applicants.
- i. 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.
- j. 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 certification, these volumes will be disregarded for proving compliance with requirement 5.1 a).
- k. For both the ECVM and non-ECVM members, 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 a) at the time the certification will be used, the auditor may consider that the resin supply clause is respected. He will then carry out a control check and ask for documentation no later than 6 months after the label audit has been completed.
- l. 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 a).

For a higher rating

- m. To reach performance level b), the PVC resin should be sourced from suppliers having fulfilled some additional *voluntary* commitments. The use of a mercury-free technology to produce chlorine is no longer awarded with extra points from version 1.1 of the scheme, 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. In order to demonstrate that the compulsory level is satisfied, evidence should be produced by the applicant which demonstrates that the product, the product system or the product group which is being evaluated does not contain cadmium, lead or low molecular weight (C8 and below) ortho phthalates.
- b. Only ortho phthalates having more than 8 carbon atoms in each alkyl side chain should be used. Examples of ortho phthalates that *may not* be used include DBP (CAS 84-74-2), DIBP (CAS 84-69-5), BBP (CAS 85-68-7), DnPP (CAS 131-18-0), DEHP (CAS 117-81-7), DnOP (CAS 117-84-0).
- c. This requirement excludes any of these materials included within any recycled material used in the manufacture, in so far as reuse of such materials is allowed (understood here in a purely legalistic way) by EU regulation.
- d. 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 higher ratings

- e. To reach performance level b), the applicant should provide additional evidences on guiding principles on the additives used. As VinylPlus partners are expected to follow most of these guiding principles by default, compliance of the product / company with all other requirements of VinylPlus will be considered as sufficient evidence to earn at least 1 point.
- f. In criteria 5.1 b), "Permanent information" means printed material, sticker, bar code, links, that help users trace the additives contained in the product. "Measures the levels" means that the company controls such levels, no fixed frequency needed. "Provides information" means that information to help customers install, maintain and treat end of life in the best sustainable way, beyond only additive use. It is allowed that VOC emission analysis can be delivered also through an industry association.
- g. To award **4 supplementary points**, evidences should be provided that the virgin part of the product which is being evaluated has been manufactured without using additives from the REACH Candidate List or the Authorisation List. The up to date Candidate and Authorisation Lists are available on the relevant ECHA webpages:

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

and

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

The VinylPlus® Product Label can be awarded to a product manufactured with an additive on the REACH Candidate or Authorisation Lists provided the exclusions of Criteria 6.1 a) are fulfilled.

- h. To award **8 supplementary points**, evidence should be provided that the key additives included in the product evaluated have been generically assessed using the ASF (Additive

Sustainability Footprint) methodology. The VinylPlus Additive Committee has worked out an advanced concept regarding the Sustainable Use of Additives. The ASF allows converters to proactively assess their current sustainability performance over the product life cycle and develop plans together with their suppliers and customers to further reduce the sustainability footprint of the additives used in their products. 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. The definition of a “key additive” is provided in [Appendix](#). More information on the can be found on a dedicated [webpage](#).

7. VinylPlus Challenge 4 – Sustainable Energy and Climate Stability

7.1 Greenhouse gas emission reduction

- a. In order to demonstrate that the compulsory level is satisfied, documents should be presented proving that a system equivalent to ISO 14064-1:2018, is in place to which quantify the greenhouse gases emissions that are emitted due to the operations or due to the energy needed for running these operations. These documents must identify quantifiable improvement targets for reducing these emissions. Performance against these targets must be monitored regularly.

For higher ratings

- b. To reach performance level b), evidences should be provided that the performance on greenhouse gas emissions reduction is reported to its stakeholders. Reporting to stakeholders means that greenhouse gas emission reduction reporting is made freely available to anybody, ideally through e.g. website-based reporting or regular (annual) reports made available to all. If legal requirements do not allow to report the performance at the company level, the performance can be reported at the sector level, e.g. via a trade association.
- c. To reach performance level c), the performance will be verified by independent third-party body.

7.2 Energy Use

- a. In order to demonstrate that the compulsory level is satisfied, an **energy efficiency policy document** should be presented by the applicant. 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). Certification to ISO 50001:2018 or any equivalent energy assessment scheme will be considered as a valid evidence. 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. **Self-produced** energy should also be included in the policy and metrics.

7.3 Use of renewable energy resources

- a. In order to earn points for this criteria, the applicant must present to the auditor **evidence from its energy supplier** on the **proportion of renewable 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. Figures for the **national averages of renewable or green energy** are available [online](#).

7.4 Transport impacts

- a. In order to demonstrate that the compulsory level is satisfied, a **transport policy** should be presented as evidence to 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 associated with the transport of materials, goods and people involved in its **own** operations.
- b. In many cases, applicants 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. To reach performance level b), the scope of the transport policy and metrics should be extended so as to cover the **supply of traceable constituent material(s) in the assessed product** (cf. 3.1-3.3).
- d. A **supplementary point** can be awarded, if the applicant provides evidence that the performance on transport impact is reported to the stakeholders, at least on two of the following topics: methodology used to identify the impacts, significant environmental impacts identified, mitigation strategies, performance vs. targets. 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.

7.5 Lifecycle assessment (LCA)

- a. In order to demonstrate that the compulsory level is satisfied, the applicant should show that he uses a documented approach for improving the life cycle environmental performance of the products to be certified.
- b. To reach performance level b), the applicant will provide evidence that it has participated in a freely and publicly available LCA study that complies with the requirements of ISO 14040:2006 and ISO 14044:2006.
- c. To reach performance level c), the applicant will provide independently verified Environmental Product Declaration (EPD) that conforms to the requirements of ISO 14025:2010, and ISO 21930:2017 or EN 15804:2012+A1:2013/FprA2. Examples of suitable EPDs to reach this level can be found in [Environmental Declaration PVC-U Windows Double Glazing](#) or [Environmental Declaration PVC-U Windows Triple Glazing?](#). Suitable EPDs can be provided either by the company being evaluated or by a relevant association.

8. VinylPlus Challenge 5 – Sustainability Awareness

8.1 Demonstrating commitment and communication

- a. In order to check that the compulsory level is satisfied, 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:

- hours 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

For higher ratings

- b. 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.
- c. 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.

8.2 Local Communities

- a. In order to demonstrate that the compulsory level is satisfied, evidence that a system allowing to identify, consult and record any complaint from local communities, should be provided.
- b. An **example complaint record** is available in [the Appendix](#).

For higher ratings

- c. To reach performance level b), the applicant should demonstrate that it regularly reviews its performance in terms of stakeholder engagement and report this performance to its stakeholders. If the latter is not done, the applicant should prove that he has a written policy favouring local sourcing and business whenever appropriate and practical.

APPENDICES

	VinylPlus Product Label Criteria 1.1 b) - Integration of VinylPlus into Company Life – Living your Partnership
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1. Use and distribute the VinylPlus Progress Report, the VinylPlus Connect newsletter and any communication material prepared by VinylPlus
2. Show the VinylPlus Partnership Certificate inside your company and to your customers
3. Show the VinylPlus roll up banner at the entrance doors of your site, during fairs or conferences
4. Inform and train sales organization to promote your VinylPlus partnership
5. Promote VinylPlus to retailers, end users and procurement officials
6. Use the VinylPlus logo on your webpage, documents, invoices, brochures
7. Include on your website a link to the VinylPlus website
8. Have a dedicated section on your website on sustainability and VinylPlus
9. Participate in VinylPlus committees
10. Use VinylPlus' material to build your sustainability image towards the local community, to reach out to internal and external stakeholders, to publish a CSR or sustainability report, to issue press and media articles
11. Build and support local and national networks for political dialogue on sustainability. Examples: organize visits of politicians to visit the company and discuss sustainability issues, have a frequent exchange with local politicians and MEPs
12. Demonstrate that your social responsibility policy includes VinylPlus' initiatives. Examples of actions: contribute to the VinylPlus recycling targets (Recovinyl 2.0), include VinylPlus Partnership Certificate in your CSR report, refer to VinylPlus Progress Report in your CSR report, commit to participate to the Operation Clean Sweep® (OCS) programme, yearly report gains in energy efficiency or other sustainability indicators.
13. Participate in the annual VinylPlus Sustainability Forum
14. Encourage business partners (suppliers, competitors, customers) to join and support VinylPlus
15. Use PVC products from VinylPlus partners including recycled PVC. Examples of products: *3 layer PVC pipes used for sewage or drainage inside buildings or for cable conduits, PVC rainwater gutter, window profiles with an inner-core made of recycled PVC, luxury vinyl tiles, PVC floor covering, furniture made of PVC profile, PVC boards used for flooring/cladding/roofing/landscaping, PVC tables, PVC fences, PVC films used for stationary articles (clear folders, filing of documents), PVC garden hoses.*
16. Translate the VinylPlus recycling targets (800 kt overall in Europe) to your company or your industry association. i.a. "We stand for...", "We recycle X % of the VinylPlus volumes" "Our target is...".
17. Communicate your annual investment in supporting VinylPlus to customers. Examples: show your VinylPlus Partnership Certificate during trade fairs and customer events, communicate on your participation to VinylPlus-co-funded projects (see 18.)

18. Cooperate with others, build a consortium, apply for co-funding from VinylPlus for technical, recycling, research, and communication projects. Examples of projects co-funded by VinylPlus: EPPA's European Brochure on PVC Windows, WUPPI recycling system, PVC Forum Italia's PVC Park project, ESWA's Roofcollect, ERFMI's Circular PVC Flooring Platform, IVK Europe's PVC Recycling, PVCH's Thermovinyl, Resysta Consortium for Recycling.
19. Create and promote controlled material loops with your customers. Examples of PVC waste recycling schemes: Roofcollect, Rewindo, Oreade, Polyloop, EUPolySEP
20. Follow the value selling concept for recycling solutions, asking the same or even a premium price for products containing recycling.
21. Run employees through a documented learning process on sustainability (e.g. the TNS system conditions) and what it means for your company. Invite your employees to participate in initiatives around sustainability.

Scoring table

Up to 5 elements	1 point
6 to 15 elements	2 points
More than 15 elements	3 points

	VinylPlus Product Label Criteria 2.1 a) Written Responsible Sourcing Policy and Principles
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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.

Company logo	Responsible Sourcing Policy
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Title
Doc Nr.

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: _____

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.

	VinylPlus Product Label Criteria 3.2 a) – Summary of Requirements for an Environmental Management System
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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.

Purpose

The below check list will allow the auditor to validate an Health and Safety Management System (H&S MS) as equivalent to OHSAS 18001:2007 and ISO 45001:2018. As a minimum, the VinylPlus scheme recognises organisations where the H&S MS meets these requirements, even though the system is not certified by an accredited organisation.

1. The company has set up and maintained a H&S MS
2. The company has an H&S policy in place. This policy complies with the structure and risks of the company and commits to constant development, compliance with applicable laws as well as any other requirements in connection with the company.
3. H&S risks are defined and regularly assessed
4. Applicable laws and company requirements are identified and information thereof communicated to the staff
5. The company has common, division related and individual H&S targets. Suitable indicators are designated for each H&S target, targets are reasonable and attainable. Targets are communicated to the staff and introduced in the management program.
6. H&S Management programs are developed in order to meet the targets. Developments are monitored, reviewed and taken under record. Strategies and plans are updated according to the results.
7. The company has assigned one of its top managers as the management representative. He determines the responsibilities and powers of such staff managing, performing and verifying the H&S activities. The management representative regularly informs the management of the system performance.
8. Training is provided to the employees and subcontractors on the issue of H&S. The company informs its employees of the H&S issues. The employees recognize their own representatives as well as management representative over the issue of H&S.
9. A system to control OHS documents and data is in place. The system encompasses definition, approval, revision, publication and de-activation of documents and data.
10. The company has made the necessary arrangements to be able to control risks and have assurance about them. The company has developed plans and procedures for definition of emergencies, coping with them and prevention or reduction of potential illnesses and injuries. They are tested periodically.
11. The company has put in place a system for reporting any non-compliances, accidents, incidents and risks, making sure that they are applicable for any staff. Investigations are carried out after each incident. The OHS records are be retained in a safe environment for a period meeting legal requirements and are easily accessible.
12. All the parties involved are knowledgeable about any emergency activities which would be taken after any non-compliance, accidents, incidents or risks would be detected.
13. OHS audits are done in-house or outsourced to external auditors. Internal audit reports must be reviewed by the management.
14. Management reviews are annually carried out by the top management. The operation of the H&S MS and compliance of the company with the H&S policy and targets are assessed. New or revised H&S targets are developed for continuous improvement.
15. Analysis of the context and stakeholder's needs
16. Identification of risks and opportunities

Purpose

This document provides guidance regarding the type of document that needs to be in place with respect to the needs of the Waste 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.

A Waste Policy Template

Company Logo	Waste Policy	Doc No:	
		Revision: No:	
		Date:	
		Page:	- 30 -Page 30 of 39

Background

[Company] is committed to the principles of the waste hierarchy, i.e.:

- Reduce
- Re-use, and
- Recycle

Key Principles

[Company] will seek, through its purchasing policy and other associated procedures, to ensure that the operational focus is on waste elimination in the specification purchasing and manufacturing process. However, where the scope for waste elimination is limited or has been exhausted waste will be disposed of by the most environmentally sustainable means.

[Company] aims to ensure that Best Practical Environmental Option is applied to all waste streams.

{Company’s} Purchasing Department, through all relevant documented procedures, will actively pursue the most appropriate materials and technologies which will reduce waste and the Company’s overall environmental impact.

[Company] is also committed to reducing the levels of waste generated by its products at point of use.

Note: Specify here engagement eg with take-back- reuse and recycling schemes with which the company is engaged.

Metrics

Waste metrics will be measured through the following means:

Note: these are typical metrics; select those of most relevance to operation or specify others.

- Total mass of non-hazardous waste sent to landfill (Tonnes year⁻¹)
- Mass of non-hazardous waste sent to landfill as a proportion of total product produced (%)

- Mass of hazardous waste disposed (Tonnes year⁻¹)
- Mass of hazardous waste disposed as a proportion of total product produced (%)
-

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

Date: _____



VinylPlus Product Label

Criteria 4.3 a) Steps towards Product Design for Reuse and/or Recycling

- Reuse and recycling of the PVC part are clear priorities for R&D when developing new products
- Internal meetings highlighting reuse and recycling, leading to actions and progress measured against targets can be documented
- Controlled loop or closed loop concepts are developed with customers
- Company participates in industry recycling schemes
- Company develops products / systems with a maximum of components made from PVC allowing to maximise recycling
- Company develops products / systems that allow a very quick dismantling / separation of components before recycling

Scoring:

Up to 3 steps

2 points

4 to 5 steps

3 points

More than 5 steps

4 points

Matrix Status PVC resin suppliers							Update VS	20.01.2020
Requirement 5.1								
PVC resin manufacturer	Compulsory level (5.1 a))			Non compulsory level (5.1 b))				
	Member of ECVM	Comply to the ECVM charters or equivalent	Contribute to VinylPlus through enabling fee	VinylPlus partner	Not involved in a transport incident with VCM release during last three years	Report emissions in line with Euro Chlor Sustainability programme (2019 status)	Report emissions EDC/VCM/Dioxins to ECVM	
Anwil		Verification on 4.12.2019. Results pending.						
Borsodchem								
Ercros								
Inovyn								
Kem One								
Fortischem								
Shin-Etsu						Reported through its chlorine supplier Akzo-Nobel		
Spolana								
Vestolit (Mexichem)								
Vinnolit								
Vynova								

A green box means that criteria is fulfilled by the PVC resin manufacturer.

Examples of "Equivalent Schemes" to the ECVM Charters include

- 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 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 Charters. 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 Charters.

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

Key Additives: Definition and Threshold

An additive (assessed through the ASF methodology) is a chemical substance added to the PVC resin to enable a proper processing (compounding, extrusion, calendaring, moulding, etc..). Additives may also be used to bring to the final article specific performances and/or reduce raw material 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.

This list does not include 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.

Key additives are defined by VinylPlus through concentration thresholds.

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 Category 1a or 1b, or PBT, or of an equivalent level of concern. In the latter case, the threshold will be lowered to 0.1%, coherently with thresholds defined in REACH.

The proposed threshold of 0.3 phr corresponds to an average of about 0.2% into an article. In the case of a stabiliser, each of its components representing at least 5% of the entire stabiliser mix will be evaluated, unless this component represents an issue in terms of its toxicologic profile, in which case a 0.1% threshold will be proposed for this case.

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:	- 35 -Page 35 of 38

Complaint Reference No.:

Description of Complaint	Date: _____
Complainant's Details:	
Name:	
Address:	
Telephone No:	

Investigation / Evaluation of significance of Complaint
Name: _____ Signature: _____ Date: _____

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 upstream raw materials chain -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"> • Add reference to ISO/IEC 17067 guidelines and type of certification in general notes • Mention that conformity assessment can either be done by BRE or an accredited certification body (list provided by VinylPlus) in general notes • Refer to ISO 9001:2015 in sections 2.3.a., 2.3.c., 3.1.b • Refer to ISO 14001:2015 in sections 3.2.b., 3.2.c., 3.2.d. • 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 • Modify Appendix to clause 3.3.a explaining the principles to be followed by an equivalent EMS to ISO 14001:2015 • Refer to OHSAS 18001:2007 and ISO 45001:2018 in clause 3.3.c • Clarify that self-produced energy should also be subject to energy efficiency measures and reduction target settings in section 7.1.a • Give reference to the energy sources that can be considered as renewable in section 7.2.a <p>- Remove in section 3.2.c. sentence "The Appendix 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
1.3	January 2020	-Modify lay out of first page of document -Replace the General Notes section by Foreword and Scoring Methodology sections. Clarify wording and definitions of product system and product range. - Clarify wording and provided updates for criteria 4.1. Add an allowed +/-10 % interval around an overall average for the recycle content. -Clarify wording and provided updates for criteria 5.1 (5.1 a.-h.) -Modify wording for paragraph 7.1 to account for the focus on greenhouse gas emission in v1.3 -Add new paragraph 7.2 Energy Use	V. Stone

		<ul style="list-style-type: none">-Modify paragraph 7.4 on Transport Impacts to account for the new rating system in v 1.3-Modify paragraph 7.5 to take into account new rating system in v.1.3-Add new paragraph 8.2 Local Communities.-Add examples to Appendix for Criteria 1.1 b)-Update Matrix Status PVC resin suppliers (Appendix for Criteria 5.1)-Add Appendices on Criteria 3.3 b), 4.3 a), 8.2a)	
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