To fight plastic pollution,

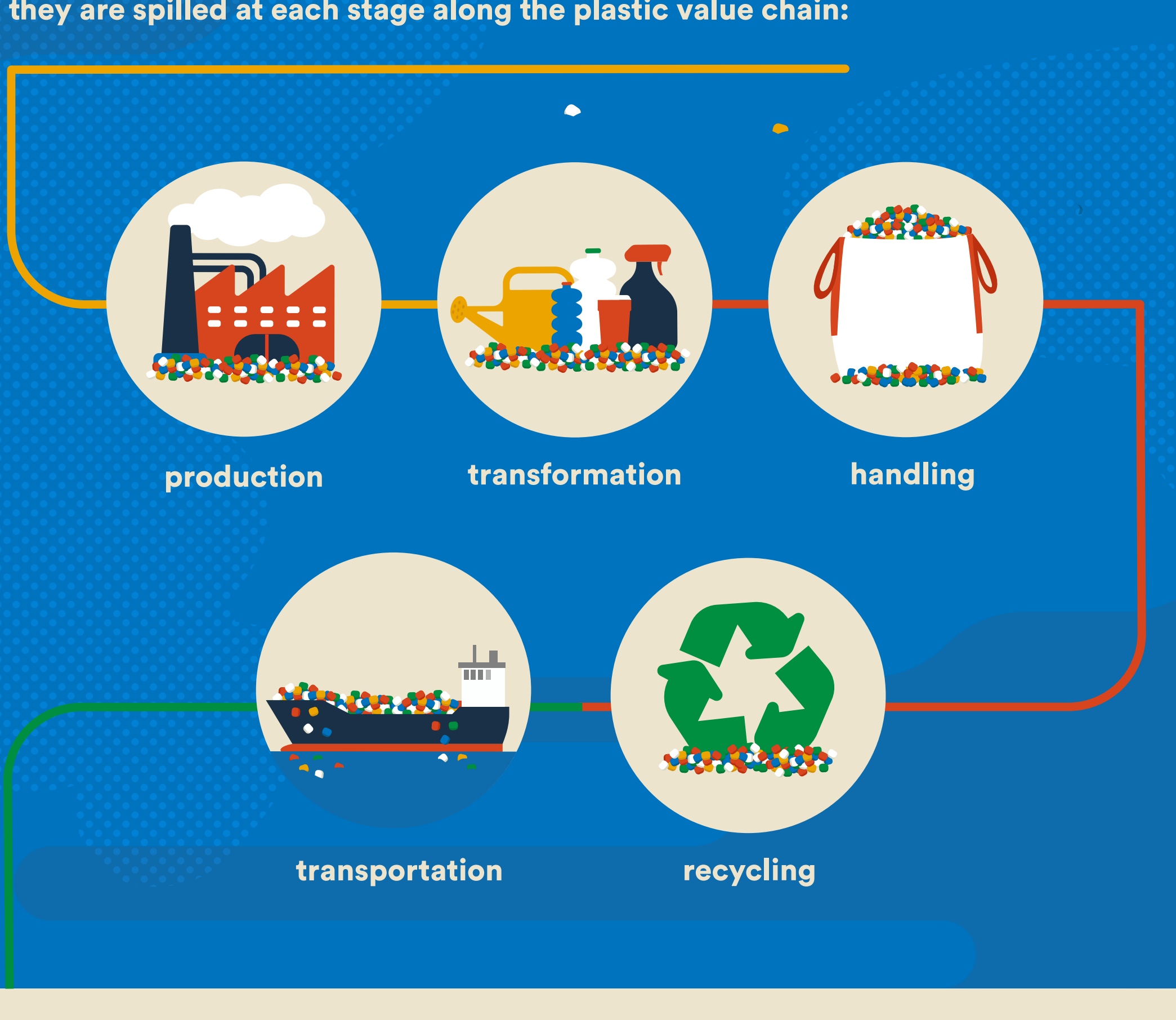
BEWARE OF PLASTIC FAKE OUTS.

Each year, 160,000 tons of plastic pellets are "lost" by the industry in the European Union. Globally, more than 230,000 tons end up in aquatic environments.

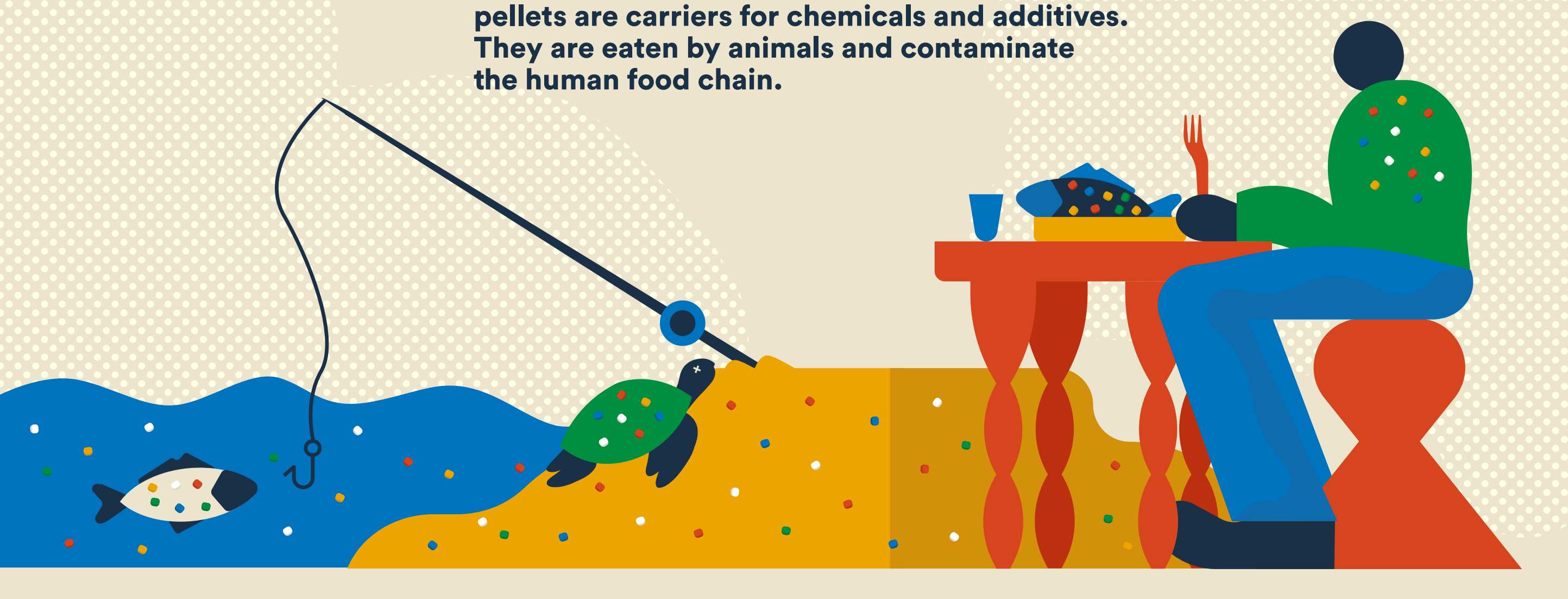
Pellets are the second most significant source of primary microplastic pollution in our ocean.

Plastic pellets, also called nurdles, are the raw material used in the manufacturing of plastic items. Their lightness, small size (typically less than 5 mm) and most often spherical shape makes them easy to transport and mould into plastic objects.

Because of malfunctions and/or bad practices, they are spilled at each stage along the plastic value chain:



Our environment suffers from this persistent and irreversible pollution: pellets are carriers for chemicals and additives. They are eaten by animals and contaminate the human food chain.



This industrial pollution is not anecdotal. The issue is massive and chronic in Europe and globally, with no signs of improvements. The first instances of pellet pollution were in the 1970s, and the industries manufacturing and handling pellets hold full responsibility for this pollution.

Yet for decades, they have only offered a false solution: Operation Clean Sweep

Operation Clean Sweep®

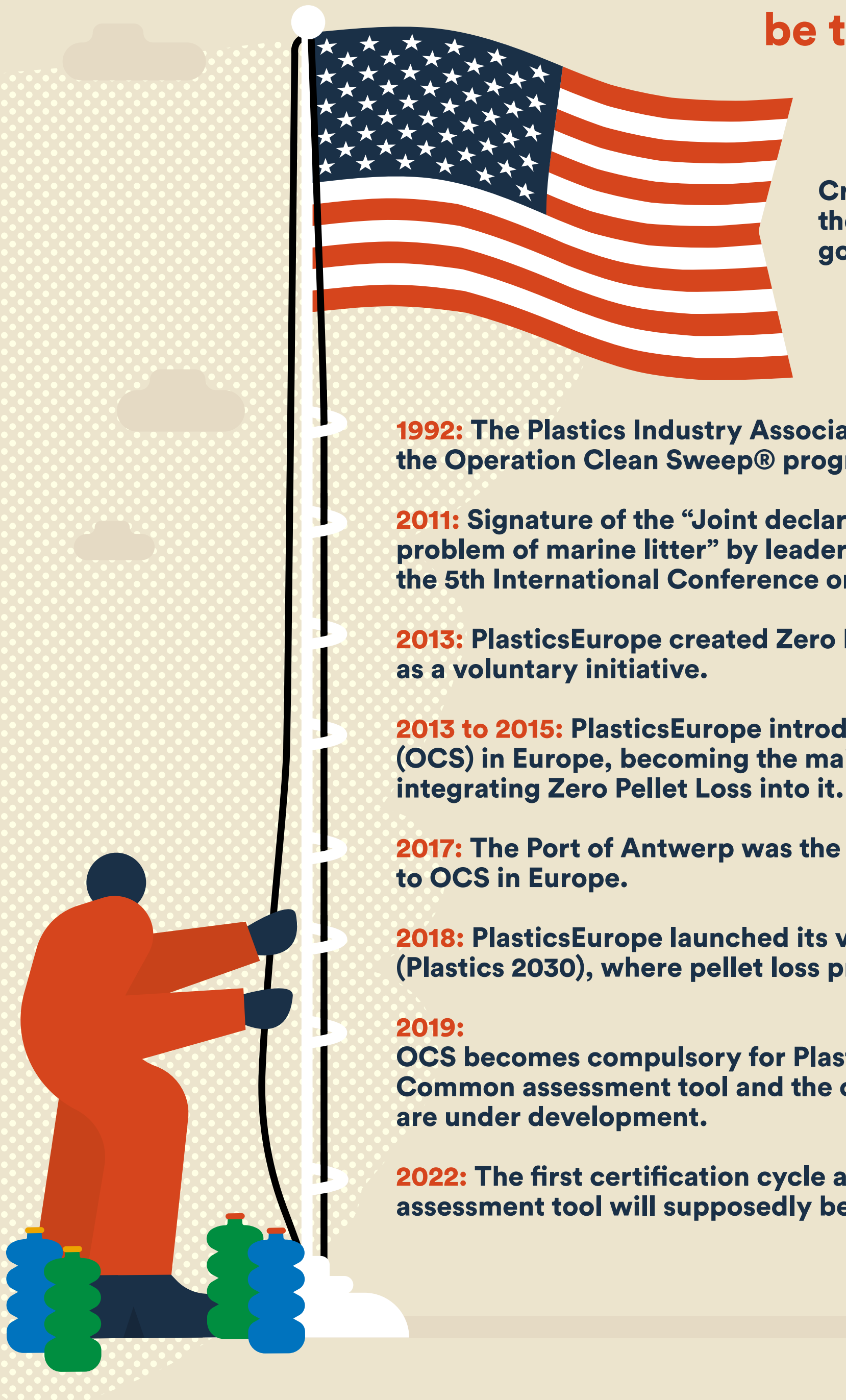
PLASTIC FAKE OUT

OPERATION CLEAN SWEEP

If you are willing to take action, why are you not willing to have that action written in the law?

Operation Clean Sweep is a voluntary initiative created and promoted by the plastics industry to prevent and contain pellet spills by implementing good practices and following guidelines.

... It looks too good to be true, because it is.



Created in 1992 in the US, the empty promises have gone on for too long

1992: The Plastics Industry Association (PLASTICS) introduced the Operation Clean Sweep® program to the United States.

2011: Signature of the "Joint declaration for solutions to the problem of marine litter" by leaders of the plastic industry, during the 5th International Conference on Marine Debris in Honolulu.

2013: PlasticsEurope created Zero Pellet Loss as a voluntary initiative.

2013 to 2015: PlasticsEurope introduced Operation Clean Sweep (OCS) in Europe, becoming the main host of the programme and integrating Zero Pellet Loss into it.

2017: The Port of Antwerp was the first to sign-up to OCS in Europe.

2018: PlasticsEurope launched its voluntary commitment (Plastics 2030), where pellet loss prevention appears as a priority.

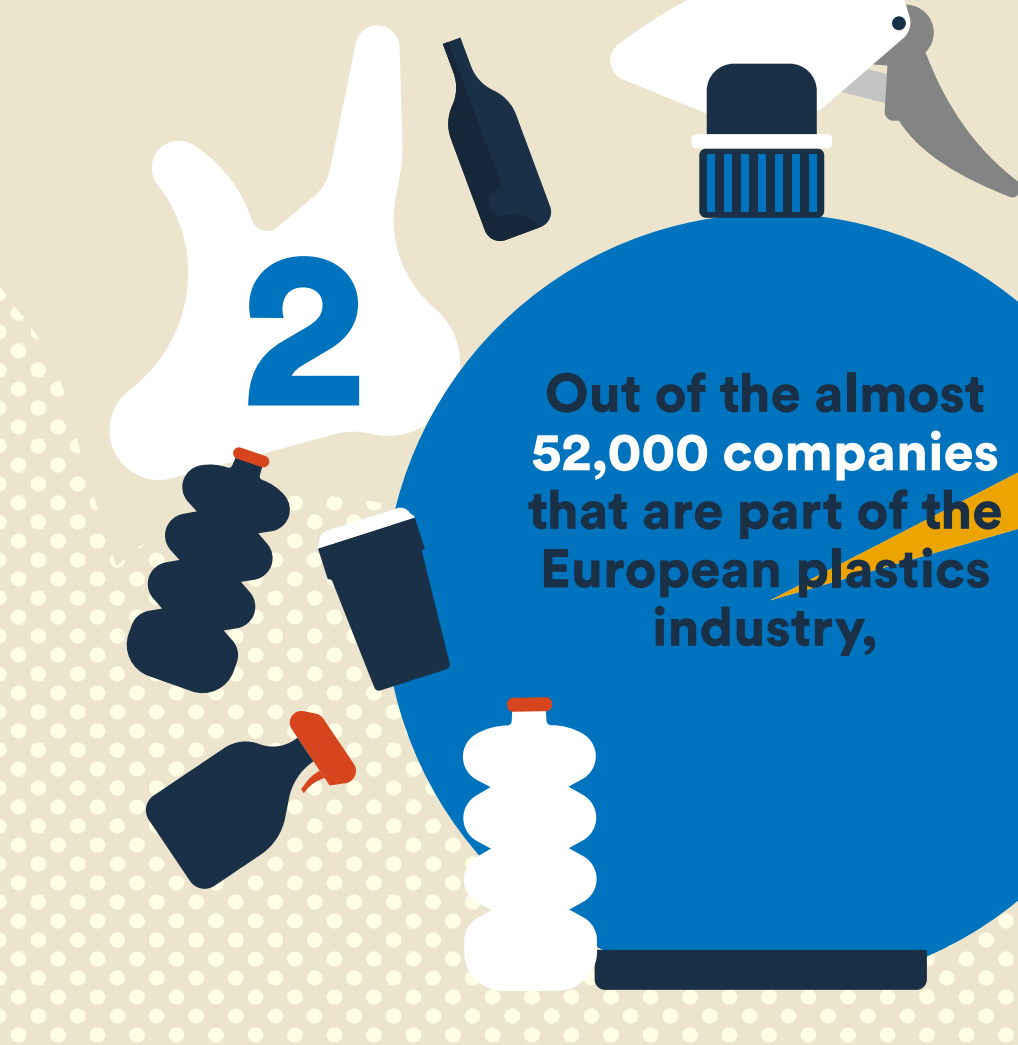
2019:
OCS becomes compulsory for PlasticsEurope members. Common assessment tool and the certification scheme are under development.

2022: The first certification cycle and common assessment tool will supposedly be launched.

This is a voluntary initiative, so:

NO OBLIGATION TO JOIN, IMPLEMENT THE INITIATIVE OR THE MEASURES IT PROMOTES.

1 Despite the magnitude of the issue, industries can still opt-in or out of the initiative. In other words, they can still choose to prevent pellet pollution or not.



2 Out of the almost 52,000 companies that are part of the European plastics industry,

Only 1,760 of them are OCS signatories. Less than 4% of those companies and mainly pellet producers, not distributors, have currently joined this initiative.

It's perfect !

3 Even when companies do join, the one-off signup and lack of audits or checks mean that cannot guarantee the entirety of the value chain is applying "best practices".

4 In some cases of proven pollution, industries can continue with a business-as-usual approach without even signing the OCS pledge, or signing conveniently only after the media covers this pollution, or when institutions are looking into regulating the sector.

It was created, promoted, and is managed by the plastic industry, so:

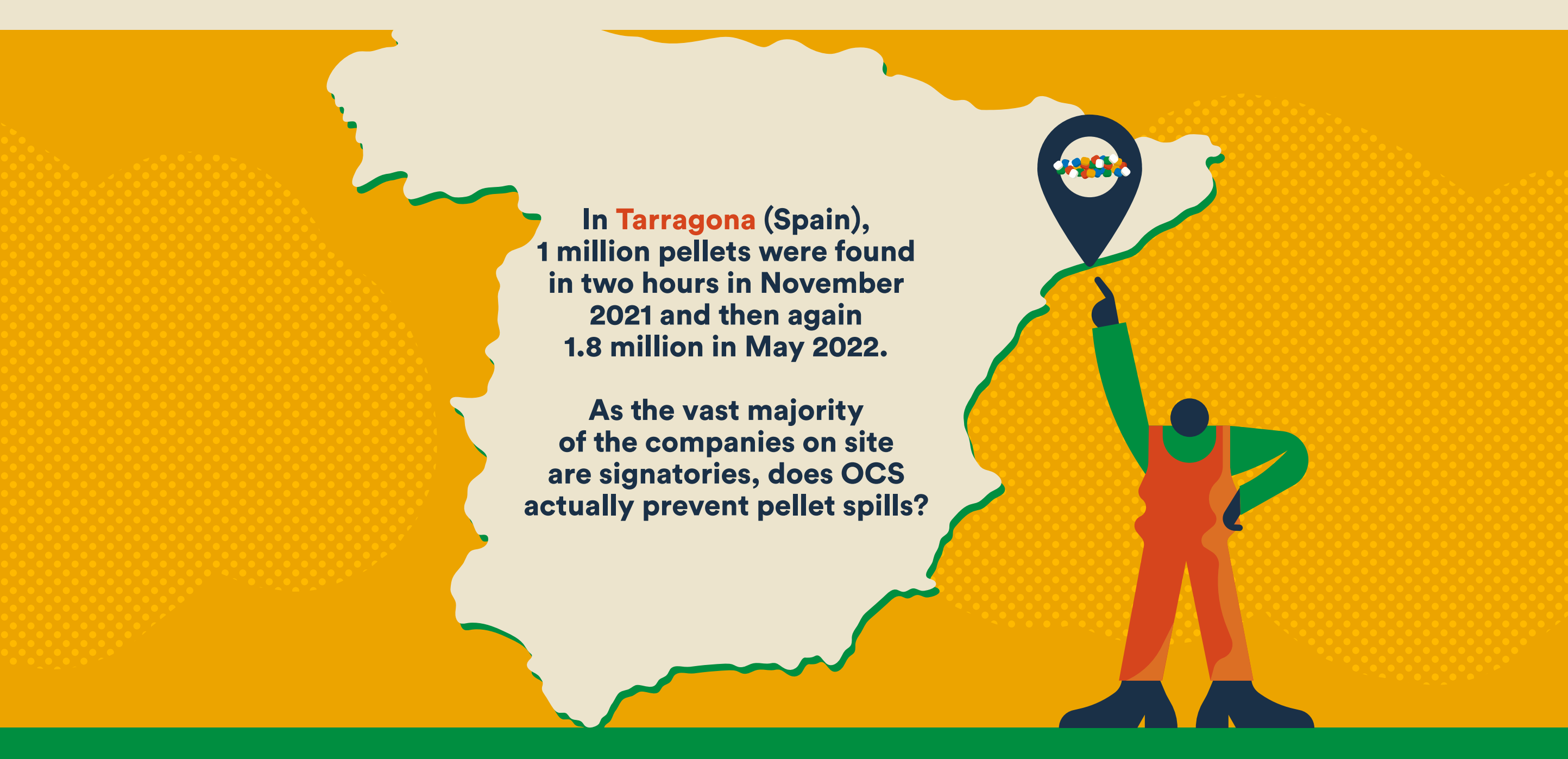
NO TRANSPARENCY AND INDEPENDENT CONTROL.

1 Three progress reports (2017, 2018, 2019), where the only numbers presented are targets in terms of signatories, but still not sharing any concrete data on avoided nor current pollution (because there is none). Since then, no more progress reports were made available to the public on the OCS website, if they were ever written (to this date 30.09.2022).

2 According to an interview from an OCS signatory, when asked if they have put in place any procedure to monitor the success of the scheme, they answered: "Nothing as yet, but as a simple monitoring technique, we plan to photograph filters at intervals to see what ends up in them. This helps to know how many pellets are being lost on the rest of the site." Monitoring should be mandatory and rigorous.

In reality, it proves unable to prevent pellet spills:

NO EFFICACY ON THE GROUND.



In Tarragona (Spain), 1 million pellets were found in two hours in November 2021 and then again 1.8 million in May 2022.

As the vast majority of the companies on site are signatories, does OCS actually prevent pellet spills?

In the port of Antwerp (Belgium), where the situation is still disastrous in 2022, a report published by PlasticsEurope in 2018 called it a "great example for other major European ports". If this is encouraging, what should we expect from lesser publicised OCS signatories?

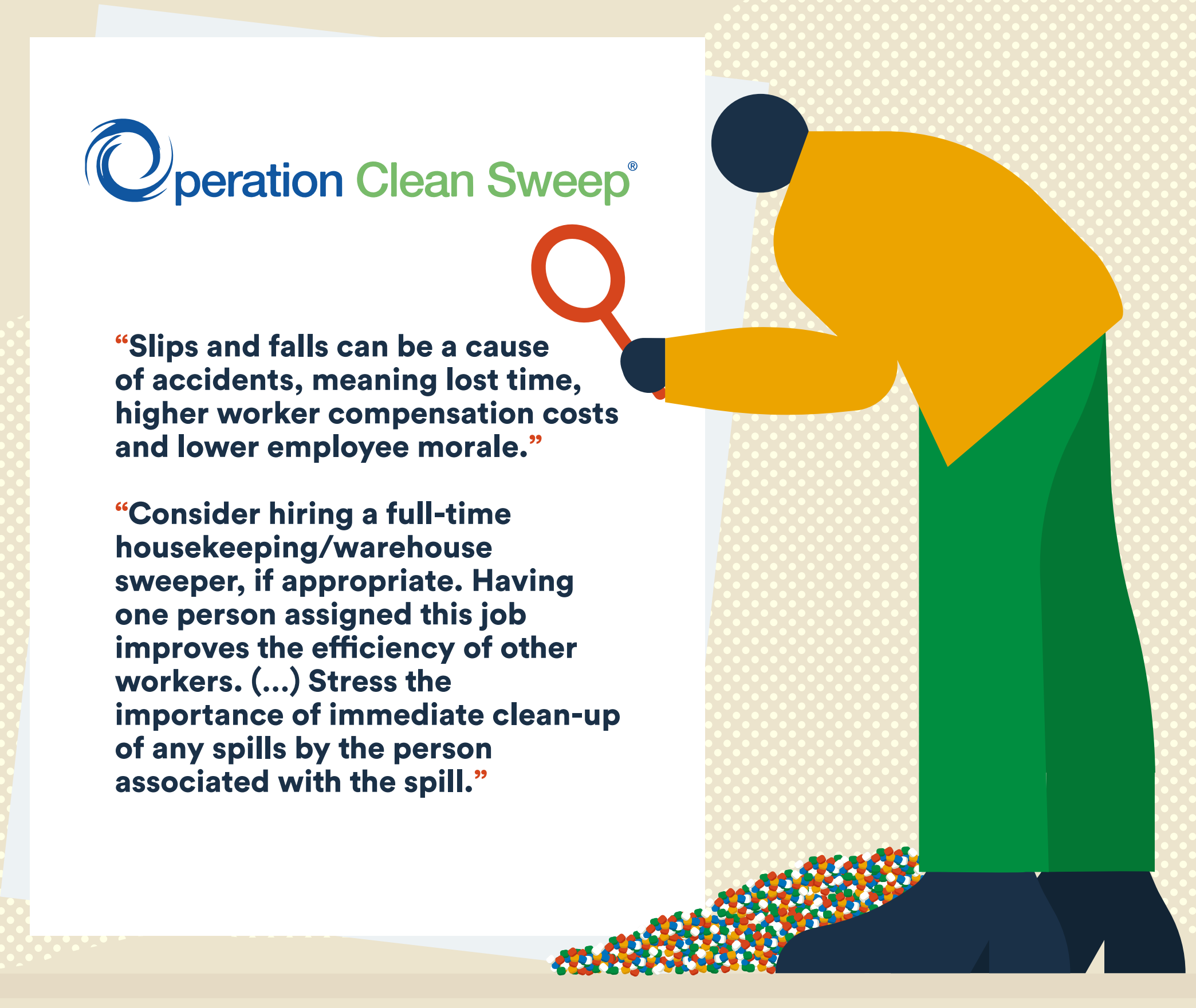
In the city of Ecaussinnes (Belgium), where the pollution has been ongoing for more than 20 years, the local industries are all signatories of OCS.

How come pellet pollution is still ongoing at this scale and chronically despite the numerous declarations on the efficiency of OCS made by the industry over the years?

It is supposed to promote implementation of good practices and guidelines:

NO CONCRETE REDUCTION TARGETS.

As the narrative is currently being subverted by the industry, OCS guidelines can state stances such as:

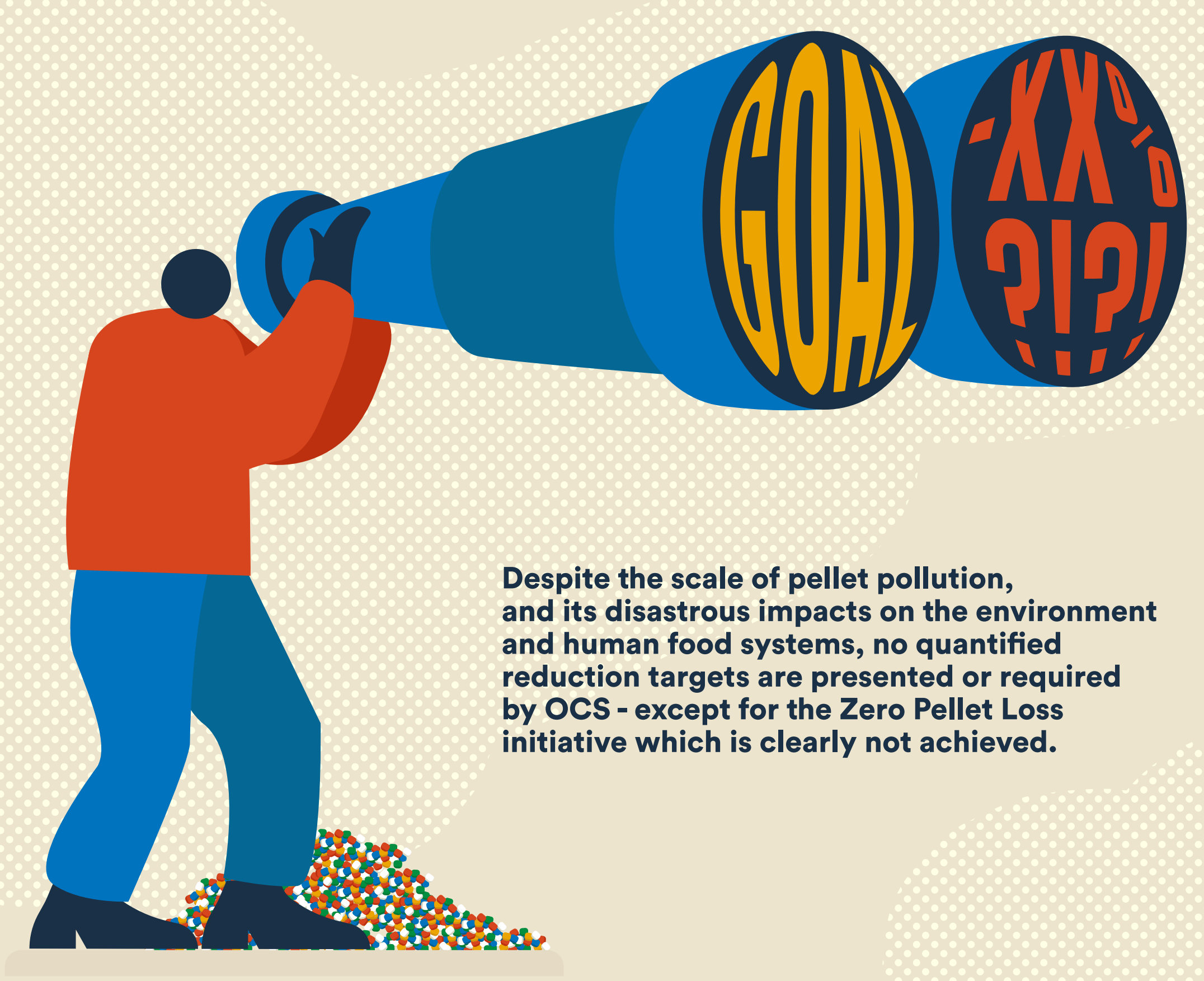


Operation Clean Sweep®

"Slips and falls can be a cause of accidents, meaning lost time, higher worker compensation costs and lower employee morale."

"Consider hiring a full-time housekeeping/warehouse sweeper, if appropriate. Having one person assigned this job improves the efficiency of other workers. (...) Stress the importance of immediate clean-up of any spills by the person associated with the spill."

The magnitude of pellet pollution and its chronic and largely irreversible nature are completely overlooked.



Despite the scale of pellet pollution, and its disastrous impacts on the environment and human food systems, no quantified reduction targets are presented or required by OCS - except for the Zero Pellet Loss initiative which is clearly not achieved.

Furthermore, considering the lack of transparency, evidence that the practices are effectively implemented on the ground and that the ones promoted are efficient is non-existent.

The only achievement made by OCS so far is delaying the adoption of binding regulations:

NO WILLPOWER TO CHANGE.

OCS was originally created to avoid the upcoming legislation in the United States which aimed at granting permits for pellet use. In 2022, as EU institutions are discussing regulation of pellet pollution, the plastics industry is presenting another false solution to buy time: the OCS certification scheme.

The Operation Clean Sweep® certification scheme

The OCS certification scheme "sets common requirements (based on the six pillars of the OCS pledge that will be audited regularly by accredited third parties", according to PlasticsEurope announcement. The agreement was signed by EuPC, the association of European Plastics Converters and PlasticsEurope, the trade association representing plastics manufacturers in Europe. The scheme should be operational in 2022.

Again, the industry is offering us an empty promise, entangled in a web of "maybe", "commitment" and "voluntary".

SO, WHAT DOES IT REALLY MEAN?

This is a certification scheme, so:

NO BINDING OBLIGATION.

Once again, when confronted with chronic and systemic pollution, industries respond with an initiative based on the will to join (or not join).

NO
NO
NO ~~YES~~
NO

The decision-making system is driven by industry voices, so:

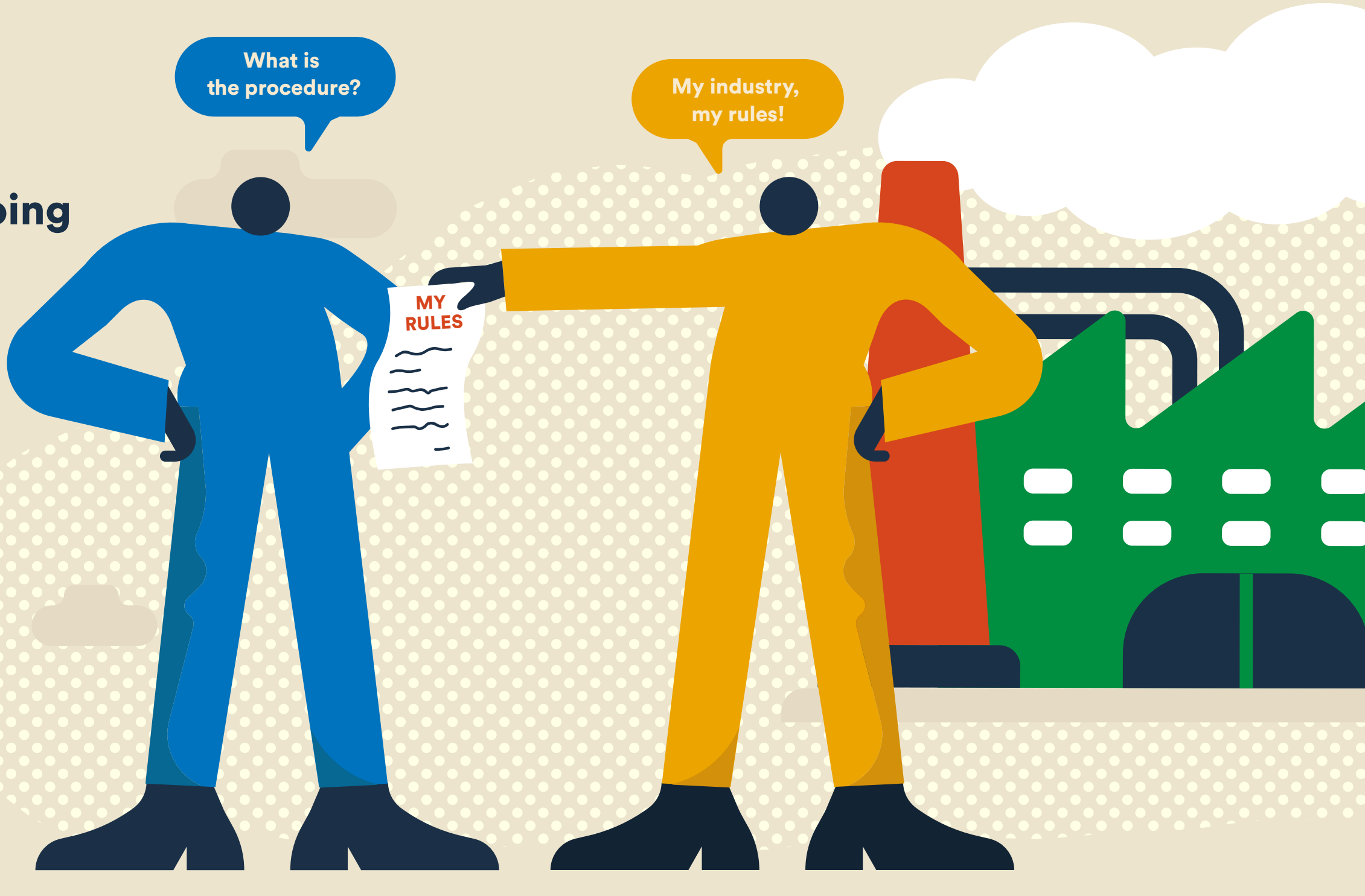
NO GUARANTEE OF FAIR DECISION-MAKING

The supervisory board is comprised of representatives of the industry, policy makers, and one NGO. However, there is no guarantee that those voices coming from external stakeholders will be heard and that they will have an impact on the decisions. Indeed, decisions are expected to be adopted by consensus, but if no consensus is reached then it will happen by simple majority. The governance system is dependent on industry power.

It is based on common requirements, so:

NO GUARANTEE FOR THE CRITERIA & RESULTS.

Where is the certainty here that those requirements will be enough to prevent pellet pollution? Will they change, evolve according to the ongoing findings on pellet pollution? The EU institutions cannot delegate environmental protection for the players to decide their own rules.


What is the procedure?
MY RULES
My industry, my rules!

It will be audited, but without public reports, so:

NO TRANSPARENCY.

The industry chose to address the lack of transparency attributed to OCS with... another non-transparent approach as, according to the draft paper of the OCS certification scheme principle: "the content of the audit report is confidential. Only the OCS audit checklist should be shared with the relevant trade association via the existing online database."

Therefore, because of the inaccessibility of the results, there still won't be any way for external stakeholders to challenge the efficacy of the OCS system.

The audits will be led by accredited third parties, but:

NO EFFICIENT INDEPENDENT CONTROL.

Even if the audits are led by third parties, they will be accredited by the OCS program and following OCS essential requirements and checklists to perform their examinations. So they will only verify if industries check the boxes decided by the industry itself, but not if pollution is being effectively prevented.

Moreover, as raised by a recent study, the associated costs might act as a disincentive for new companies to join.

The OCS 'certification scheme' is a new false solution to keep delaying and distracting from the adoption of regulatory measures, at both national and EU levels.

WHAT CAN THE EU DO TO EFFECTIVELY ADDRESS THE ISSUE?

First and foremost, the EU needs to reduce plastic production, with quantified targets and strict deadlines.

For now, plastic production is expected to double by 2035 and almost quadruple by 2050. If it continues to increase, cases of pellet pollution will too.

Second, as corrective action, remediation and compensation are unachievable once pellets are spilled, prevention is key.

I say stop! It's over!

- ☑ The EU should adopt binding measures that hold all companies involved in making, using or transporting pellets accountable by law
- ☑ Compel companies to follow and respect specific and harmonised minimum requirements for pellet handling to prevent pellet loss
- ☑ Impose that all staff are trained
- ☑ Set legal obligations for annual and independent third-party audits of these companies
- ☑ Ensure that companies are working together across the supply chain
- ☑ Penalise pellet spills in the environment and impose immediate reporting and cleaning-up
- ☑ Deny permits for new infrastructure aiming at increasing plastic production in Europe

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RETHINK PLASTIC

The Surfrider Break the Plastic Wave campaign has received funding from the LIFE Programme of the European Union. The European Commission's support for the production of this publication does not constitute an endorsement of the contents, which reflect the views only of the authors, and the Commission cannot be held responsible for any use which may be made of the information contained therein

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