

PLASTIC FREE STANDARD PRODUCT

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1. Introduction

The aim of this standard is to reduce the use of conventional plastics and encourage the adoption of more sustainable materials.

The Plastic Free standard - Product is the simplest way to certify that a certain product or packaging contains no conventional plastic. It is an international and voluntary standard that sets requirements for third party certification of Plastic Free products, packaging and materials, and is not intended to replace the legal or regulatory requirements of any country. It is the responsibility of each operation to demonstrate compliance with all applicable laws and regulations.

Conventional plastic is what we see everywhere - PET, PS, PVC, PP, PE etc. The vast majority is derived from unsustainable and non-renewable fossil fuel sources, although conventional plastic can now also be manufactured from plants to produce a product with the same chemical structure and, critically, the same indestructible qualities. Plant-derived plastic is sometimes called “bio-plastic”, and is a perfect example of the dated and confusing language used to define plastic.

For absolute clarity, we call these kinds of plastics conventional plastic to clearly differentiate them from any compostable material, and to be aligned with the terminology used by the EU.

Material Categories:

The standard covers two categories:

- Plastic Free – everything which is not plastic, including glass, wood, metal, fibres etc.
- Conventional Plastic Free – materials composed for at least 80% of the mass of each of its individual components, from biobased. For single use items, the required biobased percentage is 90%.

2. Definitions

Audit: assessment to measure compliance with a predetermined system, and whether the system is implemented effectively, and is suitable to achieve objectives.

Auditor: A person possessing the appropriate competencies and skills to carry out an audit.

Biobased: derived from biomass, i.e. from renewable organic material of vegetable, animal or microbial origin and from non-fossil fuel derivatives.

Certificate: the document issued by CUUK to confirm that an organisation has met the requirements of the Plastic Free standard - Product;

Certification: the procedure by which an authorised certification body, based on an audit and assessment of an organisation's competence, provides written assurance that an organisation conforms the standard's requirements.

Certification Body (CB): an independent third party that handles an audit and certification process.

Chain of Custody: the process by which inputs, outputs, and associated information are transferred, monitored, and controlled as they move through each step in the relevant supply chain.

Component/constituent: an identifiable component of a product that can be separated by hand or by using simple physical means.

Compostable/Compostable Material: material that undergoes degradation by biological processes during composting to yield CO₂, water, inorganic compounds and biomass at a rate consistent with other known compostable materials and leave no visible distinguishable or toxic residue.

Conventional Plastic: fossil fuels-based materials that include the commodity plastics polyethylene (PE), polypropylene (PP), polyurethane, polyethylene terephthalate (PET), polystyrene (PS), and PVC.

Manufacturer: a company that produces products from raw materials and/or components and supplies products to a customer.

Non-conformity (NC): any failure to meet a standard requirement.

Organisation: The legally registered entity with legal ownership of the product/site which is being audited against the standard (alternative term is “company”)

Plastic Free materials: metal, wood-based products, glass, and any other non-plastic material that can be recycled.

Packaging: outer layer, such as a carton or tray, used to protect products from damage and often printed with information about the product.

Packaging Component: part of packaging that can be separated by hand or by using simple physical means.

Procedure: Agreed method of carrying out an activity or process which is implemented and documented in the form of detailed instructions or process description (e.g., a flowchart).

Product: anything which is manufactured or sold and can be a material, a semi-finished/intermediate product, or a final retail ready product.

Single-use: any item for which only one use is foreseen before they are disposed of in waste.

Site: a unit of a company, the entity, which is audited, and which is included in the audit report and certificate.

Scope Certificate: document detailing the scope of the certification, the certified company’s details, and the certified products details.

Standard Owner: organisation responsible for the development and maintenance of the standard, owns the logo, and manages the labelling scheme. The standard Owner must also ensure that the scheme continues to meet market needs.

Specification: An explicit and detailed description of a product, packaging, or material.

Traceability: ability to trace and follow raw materials, components, and products through all stages of receipt, production, processing, and distribution.

3. Scope

This standard applies to any product which is free from conventional fossil fuel-based plastics. It specifies the requirements and test methods for products to be accredited as Plastic Free or Conventional Plastic Free.

Products are only considered Plastic Free/Conventional Plastic Free if all the individual components and constituents meet the requirements set out herein.

This standard enables certified organisations to make claims about the Plastic Free/Conventional Plastic Free nature of their products/packaging/materials at each step of its transformation, up to the final consumer.

This standard does not provide information on requirements for the biodegradability of Plastic Free/Conventional Plastic Free products which end up in the environment as litter.

The scope of the Plastic Free standard - Product does not cover foods and drinks products. Where the contents of the packaging are intended for human or animal consumption (e.g., foods, drinks, pharmaceuticals, animal feed), the Plastic Free certification can be issued for the packaging only. Where the contents of the packaging are not intended for human or animal consumption (e.g., shampoo/conditioner, cleaning fluids, cutlery), if the packaging and the content together comply to the standard, then it's possible to use the product claim, while, if just the packaging complies to the standard, then only the claim for packaging is allowed. Any semi-finished/intermediate product can be certified as a Material.

Plastic Free - Material	Conventional Plastic Free - Material
Plastic Free - Packaging	Conventional Plastic Free - Packaging
Plastic Free - Product	Conventional Plastic Free - Product

4. General requirements

All Products must be fully chemically, physically, and visually characterised.

All products must demonstrate that they are either entirely made of non-plastic materials (including microplastics), and, whenever possible, fully recyclable in the territory in which they are deployed or made, or of non-conventional plastic (80% / 90% biobased).

4.1. Legal and social compliance

- 4.1.1. The Organization shall demonstrate compliance with national laws and requirements related to its operation.
- 4.1.2. The Organization shall not use child labour in any way. The Organization shall demonstrate compliance with the national minimum age for employment and/or the age of completion of compulsory education, whichever is higher. In no case shall the Organization rely on work performed by children under the age of 14.
- 4.1.3. The Organization shall not use forced or compulsory labour as defined by ILO convention 29 and shall especially forbid itself to create any condition that will generate an unfair dependence of workers towards the Organization (such as retaining identity documents, salaries, generating debts).
- 4.1.4. Certified Organizations shall respect equal opportunities in terms of recruitment, compensation, access to training, promotion, termination or retirement.
- 4.1.5. Workers have the right to freedom of peaceful assembly and to freedom of association with others, including the right to form and to join trade unions for the protection of their interests. No restrictions shall be placed on the exercise of these rights other than such as are prescribed by law and are necessary in a democratic society in the interests of national security or public safety, for the prevention of disorder or crime, for the protection of health or morals or for the protection of the rights and freedoms of others.
- 4.1.6. The Organization shall have bespoke policies in place ensuring that workers are at least paid minimum legal wages.

4.2. Management system

- 4.2.1. The organisation shall have or create a dedicated management system to ensure that it can maintain its compliance to the requirements of this standard.
- 4.2.2. One person within the organisation shall be appointed as quality manager to oversee the implementation of the standards' requirements.

This person shall also be the main contact person with the Certification Body during audits and their preparations.
- 4.2.3. The organisation shall have procedures that can be made available to the CB to

demonstrate its compliance with requirements of this standard.

4.2.4. The organisation shall maintain documentation to prove conformity to the standard requirements. The documentation of previous audits must be kept for at least 4 years and presented to the auditor upon request. A non-exhaustive list of records to be kept includes methods and procedures, product lists, purchases and sales documents including invoices, contracts, accounting records, list of customers and suppliers, list of subcontractors, training material, logo use and claims approvals.

4.3. Material sourcing and traceability

4.3.1. The Organization, depending on its nature and its production objective with regards to Plastic Free, shall purchase from:

- An Organisation certified to the Plastic Free Products, Packaging, Material standard
- An Organisation certified to the Conventional Plastic Free Products, Packaging, Material standard
- A non-certified organisation, providing that all the technical details and documentation can be provided as specified in the supply chain model section.

4.4. Supply chain model

The Plastic Free certification is structured as a hybrid Chain of Custody.

Differently from other Chain of Custody certifications, Plastic Free CoC can be started at any point of the supply chain. Once started, it must be carried out until the finished product, including traders and brands, in order to make claims and use the logo on the finished product. If the CoC does not start at the material level, the applicant must be able to provide all the specifications to ensure that the products comply with the standard.

5. Technical requirements

Each product and, if applicable, its components under assessment, shall be identified and characterised. Each of the following characteristics shall be established and declared including, where relevant, quantity relative to the requirement.

5.1. Conventional Plastic Free products

5.1.1. Chemical, physical, and visual characterisation

- Product identification: information necessary to identify the product (product description, product design)
- Product composition: information necessary to identify the composition of the product and its components shall be declared and recorded. Additional testing may be requested.
- Absence of hazardous substances (Annex)
- Declaration of conformity: all products and components shall conform to all relevant national, regional, and international regulations and restrictions regarding food contact, substances deemed harmful to the environment, and substances of very high concern.
- Equivalent form: a product or component which has demonstrated to be Conventional Plastic Free in a particular form shall be accepted as being Conventional Plastic Free in any other form having the same composition or specifications.

5.1.2. Biobased content

- Products must be tested or certified 80% biobased.
- Single-use items must be tested or certified 90% biobased.

5.2. Plastic Free products

5.2.1. Product characterisation

- Product identification: information necessary to identify the product (product description, product design)
- Product composition: information necessary to identify the composition of the product and its components shall be declared and recorded. Additional testing may be requested.
- Absence of hazardous substances (Annex)
- Declaration of conformity: all products and components shall conform to all relevant national, regional, and international regulations and restrictions regarding food contact, substances deemed harmful to the environment, and substances of very high concern.

- Equivalent form: a product or component which has demonstrated to be Conventional Plastic Free in a particular form shall be accepted as being Conventional Plastic Free in any other form having the same composition or specifications.

5.2.2. Recycling

Products and their components should be suitable for recycling in the territory of their intended market. Known impediments to recycling shall be avoided.

Residual quantities of substances like glues and inks containing plastic are allowed only if there are more stringent or legally mandated regulations to which the product must comply, or if there are no commercially available alternatives. However, the recyclability must not be affected.

All end-of-life claims should comply with ISO 14021:2016 - Environmental labels and declarations.

6. Audit protocol

6.1. Selection of an Audit Protocol

There are 2 ways for organisations to demonstrate their compliance to the Plastic Free standard: on-site audit and desk audit. The type of audit shall be decided according to a risk assessment conducted by the auditor.

6.1.1 On-site audit

The on-site audit consists of the following stages:

- Opening meeting, to confirm the scope of the audit
- Facility inspection, to review practical implementation of the system, including observing production procedures and interview of personnel
- Document review, a review of all the relevant documents for the management system, material sourcing, material handling, material and products record, and sales
- Final review of findings by the auditor and discussion of any non-conformity raised during the audit
- Closing meeting

6.1.2 Desk audit

The Desk audit consists of the following stages:

- Opening meeting
- Conducting interviews
- Completing checklists and questionnaires
- Conducting document review with client participation
- Conducting document review (e.g., records, data analysis)
- Analysing data

During the audit detailed notes should be made by the auditor regarding the conformities and non-conformities (NC) against the standard and these will be used as the basis for the audit report.

At the closing meeting, the auditor shall present all the findings but shall not make comment on the outcome of the certification process.

Following a technical review of the audit report, the decision to award certification will be determined independently by the certifier.

Identified NC should be documented and actioned and the company must provide appropriate evidence of close-out. The Certification Body should review the information and confirm the certification decision.

If a certified organisation fails to provide proof of corrective action within 30 days from the surveillance audit day, the certificate will be withdrawn.

If a non-certified organisation fails to provide proof of corrective actions within 90 days from the initial audit, the certificate will not be issued, and a full re-audit will be needed to proceed with the certification.

7. Logo and claims

7.1. General requirements

- 7.1.1. Plastic Free claims are made when a certified organisation wishes to inform publicly, generally for marketing purposes, its compliance to the Plastic Free certification scheme.
- 7.1.2. All claims shall always conform with the language requirements detailed in the standard and shall be true, accurate, and not misleading.
- 7.1.3. The use of the logo is compulsory for all claims, except on commercial documents such as invoices, quotations, and transport documents.
- 7.1.4. Plastic Free Claims shall not be made in a way that may:
- Damage the reputation, credibility and goodwill of the Plastic Free certification scheme, the trademarks and/or the standard owner.
 - Cause confusion or induce misunderstanding.
 - Induce to understand that the certification covers aspects of the product beyond the scope of the Plastic Free certification scheme (quality for example).
 - Cause the public to believe that the standard owner, or the Certification Body is responsible, endorses or supports the activity of the SC (Scope Certificate) holder beyond the scope of the Plastic Free certification scheme.

7.2. Approval

- 7.2.1. Prior to use, all assured claims require approval by the claim maker's certification body through a formal claim approval application, which grants use of the claim.
- 7.2.2. Designed artwork containing the Claim that the Organization wishes to use shall be sent for approval to the organisation's Certification Body prior to its use. The organisation shall keep a register of all approved uses by the Certification Body for at least 4 years. The standard owner will not approve claims of non-certified organisations.

7.3. Logo

- 7.3.1. The standard owner will distribute the Plastic Free logo and on-product labels high-definition files to the approved Certification Bodies for this certification scheme. Certified organisations shall request these files from their CB.
- 7.3.2. The logos used shall always be from the original high-definition files as given by the Certification Body. There are certain allowed variations of the original logo, to facilitate their usage on a broader scale, especially on products and packaging.
- 7.3.3. There are two categories of claims under the Plastic Free Scheme, promotional claims,

and product specific claims.

7.4. Promotional Claims

- 7.4.1. Promotional claims are claims made by a certified organisation to advertise its status as a scope certificate holder, its involvement in the Plastic Free certification scheme, and for the promotion of its products and services.
- 7.4.2. Promotional Claims can be for internal or external communications and are typically expected to be on marketing material, websites, corporate documentation as well as other promotional items.
- 7.4.3. Claims should be accurate, true, and never mislead consumers. organisations shall be very careful when making promotional claims so that the public clearly understands which products effectively are Plastic Free, especially when the organisation deals with non-certified products.
- 7.4.4. Clear separation between Plastic Free products and non-Plastic Free products shall be made on website, catalogue, banners, etc. Language such as “some of our products are Plastic Free certified” shall be used to clarify any possible ambiguity.

7.5. Product specific claims

Product-related claims are used to indicate that a product, category of products, or product component are certified. Because these claims are tied to an assurance process, particular care shall be taken to ensure they are true, accurate, and not misleading.

- 7.5.1. Product specific claims can only be made by organisations certified to the Plastic Free standard - product
- 7.5.2. Product-related claims may be made on-product (e.g., hang tags/swing tags, labels, product packaging) or off-product (e.g., e-commerce/online product page, social media, magazine/online advertisement).
- 7.5.3. Product-related claims that appear on-product, such as on a label or statement printed, heat-transferred, affixed, or otherwise physically attached or applied to the product or its packaging, shall only be done so by certified organisations.

Annex 1 - Prohibited and restricted inputs

While the principal aim of this certification relates to a product being Plastic Free, concerns are increasing around the impact of certain chemical substances being applied in the market. In particular, the use of BPA, PFCs and substances known to be environmentally persistent and potentially damaging. As a result, the Precautionary Principle has been applied to BPA, PFCs, hazardous substances and all the Substances of Very High Concern.

Certified Organizations shall maintain Safety Data Sheets (SDS) for each substance, mixture, component, or material used in the production of Plastic Free Products.

The SDS shall meet at least one of the following criteria:

- ANSI Z400.1-2004, which identifies information that shall be included to comply with the U.S. OSHA Hazard Communication standard.
- Regulation (EC) No 1907/2006 (REACH), as adapted to take into account the rules for safety data sheets of the Globally Harmonised System of Classification and Labelling of Chemicals (GHS) and the implementation of other elements of the GHS into EU legislation that were introduced by Regulation (EC) No 1272/2008 (CLP)⁹.
- Globally Harmonised System of Classification and Labelling of Chemicals (GHS).