



Corsair Plasticwaste Removal Standard Verification Protocol V1-3



Corsair Development Company Limited

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Standard

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The CPRS standard will undergo a revision process if required to incorporate improvements or clarifications that will not substantially change the content of the Standard and its requirements. You may submit feedback to the standard at any time; send it to malaysia@controlunion.com. Further significant revision schedule will be communicated. Please send any comments you have regarding the Standard.

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Part I: General Information

The Corsair Plasticwaste Removal Standard was developed in 2024 by Control Union Certifications (CUC) on behalf of Corsair Development Company Limited (Corsair).

Corsair is recognized as a leading international consortium tackling global environmental challenges such as plastic waste, air pollution, water pollution, and climate change. With its headquarters strategically located in Bangkok and Amsterdam, the company is known for developing and financing sustainable and innovative solutions that promote ecological balance. Renowned for its mission to clean the planet and its vision to transform waste into environmentally friendly energy and products, Corsair Group empowers individuals and businesses alike to contribute to a greener future. Its reputation is built on creating meaningful impact for a healthier, more sustainable world.

CUC specializes in inspection and verification across various sectors, including sustainable agriculture, forestry, and the textile industry. Offering a global one-stop solution, CUC provides a broad range of verification programs, including major organic certifications, with certificates recognized by authorities in almost every country. Upholding impartiality and objectivity is a core principle.

With its roots in agriculture, CUC has expanded its services to address the sustainability of supply chains in food, feed, forestry, biomass, bioenergy, social compliance, and textiles. Operating in over 70 countries, CUC's on-the-ground presence positions it uniquely to navigate the complexities of today's global marketplace.

1.0 Introduction

The Corsair Plasticwaste Removal Standard (CPRS) is the path taken by products from the manufacturing unit to the point where the finished product is sold with a valid claim. The CPRS includes each stage of sourcing, processing, trading, and distribution, where progress to the next stage of the supply chain involves a change of product ownership. Any change of ownership in the supply chain requires the establishment of effective CoC management systems at the level of the respective organization and their verification by VVB, if the organization wants to make a claim about their products.

This standard, additionally helps to define the requirement to ensure sustainable production of plastic-based products through environmentally, chemically, and socially responsible manufacturing up to labeling. This provides credible assurance that products sold with a valid claim originate from responsible/reverified sources to the end consumer. This standard facilitates the transparent flow of goods from such materials through the supply chain.

The objectives of the CPRS are:

- Track and trace recycled materials.
- Provide consumers with a tool to make informed decisions.
- Provide assurance that materials are recycled and in any product.

The CPRS is intended for use with any product containing plastic material. The CPRS standard does not address legal compliance.

This voluntary standard is not intended to replace any country's legal or regulatory requirements. Each operation is responsible for demonstrating compliance with all applicable laws and regulations related

to marketing, labor, and business practices. Sellers of CPRS products are advised to reference the allowed sustainable plastic content claims in the countries of sale to ensure that they meet all legal product claim requirements.

The next scheduled revision of the CPRS has not been defined yet. It will be based on feedback to the standard at any time; send it to malaysia@controlunion.com. More substantive feedback or suggested changes will be collected and reviewed for the next standard revision.

2.0 How to use this document

This document sets forth the overall requirements for conformity with the CPRS.

In the CPRS, the following terms are used to indicate requirements, recommendations, permissions, or capabilities:

- “shall” indicates a requirement
- “should” indicates a recommendation
- “may” indicates a permission
- “can” indicates a possibility or capability

3.0 Scope of standard

The Standard provides verification of contents for plastic material. This Standard covers the processing, manufacturing and trading and distribution of all materials or articles made from sustainable and/or reverified plastic inputs and blended products in the supply chain. The final products may include any type of plastic based materials.

Processors, manufacturers, and traders that have demonstrated their ability to comply with the relevant CPRS criteria in the corresponding verification procedure to an approved verification body receive an CPRS verification statement. Accordingly, they are considered Verified Entities. The verification statement lists the products/product categories that the Verified Entities can offer in compliance with the Standard, as well as the processing, manufacturing, and trading activities that are qualified under the scope of verification. Subcontractors and their relevant processing and manufacturing steps are listed on the verification statement of the Verified Entity assigning the certification.

Organizations that work nationally or internationally have multiple sites that are distinct legal entities administered by a central office and wish to certify several operations. They may apply for multiple certifications.

The Standard is applicable to be evaluated worldwide by any verification body accredited for ISO 17029:2019 Conformity assessment — General principles and requirements for validation and verification bodies.

4.0 Normative references

ISO 17029:2019 Conformity assessment — General principles and requirements for validation and verification bodies

5.0 Glossary of Terms

Claim: An oral, written, implied representation, statement, advertising, or other form of communication presented to the public or buyer that relates to the presence of a verified material in the content of a product.

Recycled Material: The specific material that the CPRS Standard is verifying as a content claim in a product that is recycled. A reference to a Standard followed by the word “Material” refers to material verified under that Standard.

Common Ownership: The status of sites or companies as owned directly or indirectly by the same person or entity. This includes cases where one site owns the other, or where the same parent entity owns both sites. In cases of partial ownership, this refers to a majority or controlling share.

Contracting Organization: An organization that outsources processing or storage to another site.

A corrective action request (CAR): A type of change request that documents a problem with a product or process and requests the root cause of a nonconformity be removed.

Internal Control System (ICS): The system used by an organization for the oversight and management of conformity with a Standard for multiple sites, such as a group.

Multi-Site Certification: A verification that covers more than one site under a single scope certificate and is not a group.

Organization: A legal entity that is certified to or in the process of becoming certified to this standard.

Outsourcing: The process of sending verified material to a subcontractor for services.

Processor: Entity engaged in the construction or transformation of a product, including adding trims or applying logos. Also referred to as a “manufacturer”.

Site: Any geographically distinct unit within a certificate scope. Locations which are geographically distinct or have different civic addresses are considered to be separate sites. Subcontractors are not considered to be sites. Includes: farms, processors, and offices.

Subcontractor: A legal entity hired by an organization to perform services (e.g. storage, processing) on a verified material. Subcontractors take physical possession but not legal ownership of recycled materials and are independent of the organization which outsources the material.

Trader: A site which takes legal ownership but not physical possession of verified material.

Verification Statement: A document issued by the verification body that verifies the material volumes claimed by an organization who can produce and sell specified recycled materials in conformity with a Standard.

VVB: Validation and Verification Body

Part II: Verification Requirement for Verification Body

1.0 General Requirements

VB shall verify compliance with the Verification Protocol by all Organizations in the supply chain according to the following CPRS requirements. The Standard applies to any products with plastic content.

Requirements of this Verification Protocol apply to any Organization in the supply chain (after the verification of the source materials), including manufacturing and trading. Organizations involved in the manufacturing and handling of verified products, from the initial processing to final packing, as well as traders of verified products, shall receive an on-site or off-site verification audit from VB. Verifications are to occur at least annually within the calendar year. However, if an additional verification is required between annual verifications, VB may conduct this remotely based on the outcome of a risk assessment.

The verification body (hereafter “VB”) shall issue an annual (or otherwise specified) scope declaration, including sites, products, and output claims for those organizations.

During the verification, VB shall review and observe each site's records, production processes, and storage units. Core production operations shall not be exempted from on-site verification. Core processing is any process involved with constructing or transforming a product.

Organization-owned warehouses managing and/or handling recycled materials during the post-production shall be identified and inspected at VB’s discretion. Contracted warehouses only performing shipping or repacking functions for Product Post-Production shall be reported to VB but are not required on-site verified by VB.

For verification purposes, the organization shall give VB access to all parts of the facility and all premises and the material accounting records, annual volume summaries and relevant support documents. Verifiers should be allowed to interview staff without restriction. Full access shall be given both for announced and unannounced visits. Subcontractors required to undergo on-site verification shall give the verifier the same level of access. The organization shall ensure all subcontractors will provide access to the verifier prior to handling recycled materials.

The Organization shall provide VB with any updated and accurate information necessary for the on-site verification.

VB may grant exemptions from the annual on-site verification cycle for traders without physical possession identified as low risk based on the risk assessment. In this case, a desk verification may be conducted to replace the on-site verification or may be exempt from the Verification obligation, provided they are only involved in post-production activities with verified products.

The organization shall have control and responsibility for the integrity of the verified product being subcontracted.

2.0 Risk Assessment Requirements

The risk assessments provide decision-making support in choosing between alternatives, accepting activities and products, implementing risk-reducing measures, etc.

Risk assessment for organizations

According to the CPRS verification Protocol, the following are the Risk factors

	Aspect	Risk Category	Verification requirement/Type
1.	Initial and re-evaluations	H	On-site verification
2.	Annual Verifications	M	On-site/desk verification
3.	Scope change verifications, non-conformity verifications, complaint investigations	H/L	On-site/desk verification
4.	Processing units	H	On-site verification
5.	Traders with/without physical possession	H/L	On-site/desk verification
5a.	The organization is unable to demonstrate traceability for all materials/products received, as it cannot provide documentation confirming that the description, quantity, quality, blend, mix percentage, and source detailed in the accompanying documents align with the actual products received.	H	On-site verification
5b.	The entity cannot clearly define the process loss percentage by product style for comparison.	H	On-site verification
5c.	The storage of verified material cannot be managed to identify and segregate verified material from non-verified material.	H	On-site verification
5d.	No volume reconciliation is in place to ensure that output volume does not exceed available verified input after factoring in production losses.	H	On-site verification
5e.	No CAR issued to the organization in the previous evaluation/there was no previous evaluation	L	Desk verification
5f.	Only minor CARs in the previous evaluation	L	Desk verification
5h.	One or more critical CARs in the previous evaluation	H	On-site verification

The VVB shall carry out announced/unannounced on-site verification visits based on the risks. The visits shall cover, in particular, those units or situations where there may be a specific risk of confusion or the exchange of verified products with other products. No more than 48 hours' notice may be given in advance for an unannounced On-Site verification.

Risk assessment for sub-contracting activities

Subcontractors identified as higher risk through a VB risk assessment shall be subject to on-site verification or desk verifications. Subcontractors identified as low risk through a VB risk assessment may be exempt from these.

If the risk is considered “high” for one or more activities, a physical inspection of all high-risk subcontractors included in the scope shall be carried out.

	Aspect	Risk Category	Verification requirement/Type
1.	The organization outsources a wide range of production-related activities.	H	On-site verification
2.	Independently CPRS CPRS-verified subcontractors can be utilized for production-related activities	L	Exempt from on-site/desk verification
2.	The organization is outsourcing to a subcontractor or several subcontractors regularly	H	On-site/desk verification
3.	Subcontractor(s) performing non-critical services (e.g., warehouse)	M	Desk verification
3.	Subcontractor(s) grade or sort the material during outsourced processing	H	On-site verification
4.	Subcontractor(s) label the product during outsourced processing	M	Desk verification
5.	Subcontractor(s) do not physically return the verified product following outsourced processing	H	On-site verification
6.	The organization is outsourcing processing across national borders	H	On-site verification
7.	Subcontractors shall not further subcontract their activities to a separately owned entity.	H	Not allowed

3.0 Verification Decisions, Non-conformities, and corrective actions

VVB shall take verification decisions within ten (10) working days of the date of the closing meeting.

VVB shall notify Organizations of any non-conformities (i.e., failure to meet a requirement of the requirements).

Minor non-conformity

The issue is temporary, occurs infrequently and lacks a systematic pattern, or the effects of the non-conformity are restricted in both duration and scope, and It does not constitute a substantial failure to fulfill the objective of the relevant indicator or any other applicable verification requirement.

Minor non-conformities must be addressed and resolved within six months. In exceptional cases where the deviation is beyond the organization’s direct control, this timeframe may be extended to one year.

Critical non-conformity

Non-compliance is classified as critical if, either individually or in combination with other non-conformities, it leads to or is likely to lead to a fundamental failure in achieving the objective of the relevant requirement of the applicable indicator or a significant portion of the implemented management system.

A series of minor non-conformities may collectively result in a fundamental failure or complete system breakdown, constituting a major non-conformity.

Fundamental failure is characterized by nonconformities that persist over an extended period, are recurrent or systematic, impact a large area and/or cause significant harm, indicate the absence or

complete breakdown of a system or are not addressed or appropriately resolved by the client after identification.

Major non-conformities must be corrected within three (3) months. In exceptional circumstances, where the deviation is beyond the organization's direct control, this timeframe may be extended to six (6) months.

Observations

The early stages of a problem do not constitute a non-conformity, but the verifier considers that if the organization does not address it, it may lead to a future non-conformity. Therefore, an observation concerns a warning signal on a particular issue that, if not addressed, could turn into an NC in the future.

The Organization shall submit a Corrective Action Plan (CAP) describing operational changes to comply with VVB's verification requirements.

4.0 Issuance of verification statement

An organization is verified once it has undergone an on-site or off-site assessment and has been determined by the Verification Body (VB) to comply with the requirements of this verification protocol.

The VVB issues a verification statement following a positive verification decision for the products covered under the scope of the CPRS standard.

The VVB will perform a volume reconciliation during the verification process on an annual basis to ensure sufficient input materials are available to produce the outputs, taking into account material conversions and wastage. Additionally, the VB will conduct a volume reconciliation each time a verification statement is issued to confirm sufficient inputs for the outputs of the specific batch, considering material conversions and wastage.

Note: All volume reconciliation calculations are based on material weight unless post-production sites require a count of items instead.

In cases of critical non-conformities, a verification statement can only be issued if all submitted information is accurate and aligns with the evidence provided by the organization. The verification decision-maker prepares and signs the verification statement on behalf of the Managing Director. Only signed and stamped PDF documents are regarded as the 'original,' eliminating the need to send hard copies by post.

PART III: Requirements for organizations being verified

1.0 Management System

- 1.1. The organization shall demonstrate that it is a registered legal entity with the necessary legal authorization to operate. It shall maintain a record of the name, location, and activities conducted at each site, along with documentation verifying legal authorization for all processing facilities.
- 1.2. The organization shall develop, implement, and maintain documented procedures and/or work instructions addressing all applicable requirements outlined in the Verification Protocol.
- 1.3. The organization shall maintain a documented material flow diagram.
- 1.4. The organization shall keep complete and up-to-date records to demonstrate compliance with all requirements of the Verification Protocol.
- 1.5. All records used in the implementation and verification of this protocol shall be retained by the organization.
- 1.6. A management representative shall be appointed by the organization to oversee and ensure compliance with the requirements of this standard.
- 1.7. The organization must define and clearly communicate the roles and responsibilities of all staff and management involved in implementing the requirements of the standard.
- 1.8. Staff responsible for procedures shall receive appropriate training on the implementation of the requirements of this standard. Verifiable training records shall be maintained.

2.0 Validation of the material entering to supply chain

- 2.1. The organization shall verify the volumes of the suppliers' materials to confirm any changes that might affect the availability and authenticity of the products supplied.

3.0 Input material verification

- 3.1. For input plastic based materials entering the supply chain from an outside source, there shall be documentation including the name and address of the supplier, the quantity and description of the goods, reference to claims being made about the material, and any corresponding verification or certification.
- 3.2. The Organization shall keep complete and up-to-date records of the description, quantities, origins and/or destinations of all verified products received and delivered.
- 3.3. The Organization shall check the supplier invoice and supporting documents to confirm that the date, quantity and material description all correspond to the transaction certificate.
- 3.4. For verified products received from an internal source: For goods flowing from one production unit to another within the same organization there shall be corresponding documentation that references the initial recycled materials, the quantity, and description of the verified products being received.

4.0 Products suspected of not satisfying the requirements of the verification protocol

- 4.1. The Consignee of any recycled material shall check the integrity of the packaging or container to verify the origin and nature of the certified products from the information

contained in the product marking and corresponding documentation e.g., invoice, bill of landing

- 4.2. When an Organization suspects that any input or product is not in compliance with this verification protocol, the organization shall undertake the following activities:
 - a. Notify its verification body and all affected direct customers in writing within five business days of the non-conforming product identification and maintain records of that notice.
 - b. Analyze causes for the occurrence of non-conforming products and implement measures to prevent their recurrence.
 - c. Cooperate with its verification body so that verification body can confirm that appropriate actions were taken to correct the nonconformity.

5.0 Managing verified products during production

- 5.1. The Organization shall demonstrate control over the flow of products within the unit.
- 5.2. Recycled materials or products shall be clearly identified as they progress through production.
- 5.3. Recycled materials and products shall be stored separately from non-recycled materials. Extra precautions shall be taken where recycled materials or products are being shipped, stored, or produced alongside non-recycled materials or products of the same type to ensure that no accidental commingling, confusion, or substitution occurs.
- 5.4. For each product group or job order, the organization shall identify the main processing steps involving a change of material volume or weight and specify the waste percentage.
- 5.5. The organization shall maintain comprehensive and up-to-date records detailing the description, quantities, origins, and/or destinations of all claimed materials that are purchased and sold.

6.0 Sales

- 6.1. The organization shall ensure that sales documents (physical or electronic) issued for products sold with verified claims include the following information:
 - a. Name and contact details of the organization.
 - b. Date when the document was issued.
 - c. Product name or description.
 - d. Quantity of products sold.

7.0 Claiming Recycling Benefits

- 7.1. Organizations that are verified based on CPRS and other similar schemes and that have inputs and outputs that simultaneously carry claims from these schemes shall demonstrate that the recycling benefits of products are not inappropriately counted multiple times.

8.0 Outsourcing

- 8.1. The organization may outsource activities within the scope of its verified contractors.
- 8.2. The organization's outsourcing arrangements are subject to a risk analysis by VB for on-site verification purposes.
- 8.3. Activities subject to outsourcing agreements are included in the organization's scope

NOTE: Storage sites are exempt from outsourcing agreements where they constitute stopping places as part of transportation or logistic activities. However, if an organization contracts a service provider to store goods that have not yet been sold to a customer, this is considered an extension of the organization's storage site and, therefore, subject to an outsourcing agreement.

- 8.4. The organization shall establish an outsourcing agreement with each contractor, specifying at minimum that the contractor shall:
 - a. Conform to all applicable verification requirements and the organization's procedures related to
 - b. the outsourced activity.
 - c. Not make unauthorized use of the trademarks (e.g., on the contractor's products or website);
 - d. Not further outsource any processing.
 - e. Accept the right of the organization's verification body to verify the contractor.
- 8.5. The organization shall provide documented procedures to its contractor(s) that ensure the following:
 - a. the material under the contractor's responsibility shall not be mixed or contaminated with any other material during the outsourced activity.
 - b. the contractor shall keep records of inputs, outputs, and delivery documentation associated with all material covered by the outsourcing agreement.
- 8.6. The organization shall maintain legal ownership of all materials during outsourcing.

NOTE: Organizations are not required to re-take physical possession of the products following outsourcing (e.g., products may be shipped directly from the contractor to the organization's customer).
- 8.7. The organization shall identify the invoices of materials sent for outsourcing following the requirements specified in Clause 7.1. Contractors are not required to identify the invoices of materials after outsourcing.

Annex I: Multi-Site and Group Criteria

AI.1 Eligibility Requirements

- a. An organization may include multiple sites in the scope of verification, provided that all sites are under common ownership or having a contractual agreement with the organization.

AI.2 Internal Control System Criteria

- a. The organization shall have an internal control system (ICS) in place.
- b. The organization shall appoint responsible personnel who is managing of the ICS and for ensuring conformity to the Standard by all sites.
- c. The ICS shall ensure that the verification body is provided with the access for all sites and shall assist with the coordination of information.
- d. The ICS shall maintain documented procedures showing how verification criteria are met, including documented procedures for at least the following elements:
 - Adding and removing sites;
 - Maintaining records;
 - Training of site and ICS personnel;
 - Internal inspections of sites; and
 - Claims about the Standard for the multi-site or group verification;
- e. The ICS shall maintain a documented management structure of the ICS, and a complete list of sites, including the site's name, address, contact details, products, and processing steps.
- f. The ICS shall ensure that:
 - All verification criteria are implemented for all sites. The ICS may manage some requirements directly, or may delegate this to sites;
 - All sites have access to a copy of the CPRS standard and any documented procedures which are maintained by the ICS; and
 - All sites understand the relevant verification criteria and are aware of consequences of non-conformity.
- g. Site and ICS personnel shall be provided with training regarding the CPRS which is sufficient to meet their responsibilities.

AI.3 Site Criteria

- a. Sites shall conform with the criteria of AI.2 a-g.

AI.4. Verification of Sites

- a. The ICS shall ensure that the verification body is granted access to all sites as described in part II for verification purposes.
- b. The organization shall acknowledge that the verification body may verify all sites onsite annually.

AI.5 Adding and Removing Sites

- a. The ICS shall have the authority to remove sites from the scope. If a site is removed, the ICS shall notify both the site and the verification body of the removal in writing, including the reason for the removal (e.g., voluntary, non-payment, nonconformity).

Annex II: Qualifications of the VB and the verifiers

In order to perform the CPRS verifications, the Corsair-approved verification body shall pose a valid accreditation for ISO 17029:2019 Conformity assessment — General principles and requirements for validation and verification bodies.

For the verifiers, the following minimum requirements shall be applied.

- a) Technical knowledge of recycling processes and techniques related to the modules assigned.
- b) Completion of one of the accredited lead auditor courses on verification technique based on ISO19011-based courses, including ISO9001, ISO14001, ISO45001, and accredited training courses for other certification systems (e.g., FSC) which include ISO19011 content.
- c) Participation in a minimum of three verifications to the Standard, under the supervision of a qualified verifier. Participation may include observing the audit or conducting audit tasks. A maximum of two verifications may be substituted with verification experience in a relevant sector (e.g. supply chain auditing experience for CCS/RCS/GRS/ISCC)
- d) Training & Knowledge of CPRS-specific manuals, procedures, and processes.

Verification Decision Makers

Verification decision-makers must demonstrate comprehensive knowledge of the verification body's procedures for making verification decisions and the applicable Standard, including all related documents, interpretations, and guidance materials.

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