



NET ZERO
EYECARE

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NET ZERO EYECARE **STANDARD** PLASTIC BALANCED CERTIFICATION

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1. INTRODUCTION

1.1 Net Zero Eyecare, Plastic Balanced Certification

Net Zero Eyecare is a not-for-profit company limited by guarantee, which provides sustainability certification and pollution-offsetting services tailored for the Optical industry. It is the aim of the organisation that by inspiring widespread and collaborative action throughout the Optical industry, we can collectively take adequate, if not radical, action on the climate crisis and the crisis of plastic pollution.

The Net Zero Plastic certification is designed to demonstrate that a business is taking necessary steps to perform comprehensive plastic accounting on their business activity to ascertain a reliable plastic footprint, and then balancing that plastic footprint using the transparent service provided by Net Zero Eyecare.

Unlike carbon accounting and footprinting, the process of plastic footprinting is not well-established with globally agreed components of best-practice. In many ways plastic footprinting is fundamentally easier than carbon because of the tangible nature of plastic - we can see and feel plastic, and have to actively remove it from our business environments (as products or as “waste”). Therefore, the footprinting required in this standard refers to the footprinting process outlined in Net Zero Eyecare GUIDANCE on Plastic Footprinting v1.1.

It is no secret that the Optical industry is plastic-centric; from the single-use medical items used in eye examinations and care, to spectacles, lenses and contact lenses, the plastic products used in the industry are extensive, not forgetting the plastic packaging used in the supply chain and outright waste produced in manufacturing processes. Regardless of the type of plastic used, its status as “product” or “waste”, and end-of-life possibilities, this standard seeks to negate all forms of plastic pollution from the optical industry.

This Standard also seeks to drive the optical industry towards a circular economy, in which all forms of plastic are recyclable and recycled (not currently possible and requiring substantial research and development).

1.2 Certification Applicants

Businesses that can apply for Plastic Balanced certification include but are not limited to:

- Optical Practices
- Sales / Distribution agents
- Frame Manufacturers
- Lens Manufacturers
- Equipment Suppliers
- Other (non-goods-based) Suppliers that operate from one or more office environments

1.3 Standard Revisions

This standard is revised annually by the Net Zero Eyecare steering group with input from key and relevant parties, unless situations change so severely as to warrant more regular revision. To submit comments on this standard at any time, please email andrew@netzeroeyecare.org

The previous version of this standard was titled “Net Zero Plastic Certification Standard v1.1”

2. CRITERIA FOR CERTIFICATION

Eligibility for Plastic Balanced certification must be assessed by a Net Zero Eyecare Approved Auditor. The Approved Auditor will, over the course of an audit conducted in-person or via video-call, ascertain whether, by the end of the audit process, the Applicant meets the criteria outlined herein.

2.1 Plastic Accounting

Applicants must demonstrate conformity to the accounting process laid out in Net Zero Eyecare GUIDANCE on Plastic Footprinting v1.1, covering Scopes 1, 2, and 3, which is summarised in section 2.1.1 below.

2.1.1 Inclusions

The plastic pollution or potential pollution resultant from / embodied within the following activities are to be included in the plastic accounting process:

Scope 1 (Waste Created)

All on-site creation of plastic waste, including but not limited to: offcuts of any size from shaping/cutting/forming plastic; formation of virgin plastic from raw materials.

Scope 2 (Waste Purchased)

All packaging for products purchased by the business, for consumption or re-sale (not including packaging included within re-sold products), including but not limited to: bubble wrap, packing pellets, expanded polystyrene, protective soft plastic sleeves, tape, food and drink containers, tonometer caps.

Scope 3 (Waste Sold)

Plastic product supply-chain activities, including but not limited to: Embodied plastic waste (scope 1 and 2 for products manufactured elsewhere, cited as accurately as possible but reasonable assumptions may be made), plastic goods sold (eg. frames and lenses), packaging passed to customers (bottles of solution, protective plastic cases, dummy lenses).

Note: All types of recyclable and non-recyclable plastic and plastic-like products (including acetate, bio-acetate, etc.) are included under the banner of “plastic” in this footprinting process.

Recycling

Within any scope, if the plastic waste accounted for is properly recycled (ie. supplied to an appropriate recycling organisation for that type of plastic) then the mass recycled can be deduced from the Applicant’s overall plastic footprint.

If other words, only and all plastic leaving a business’s custody and immediately destined for anywhere other than an appropriate recycling is considered as plastic waste and is included in the Applicant’s plastic footprint.

Once totalled, this plastic accounting activity will provide a reliable figure for the annual plastic footprint (kg or tonnes) for the Applicant. This plastic footprint is projected forwards to cover the next 12 months of operations (even if the Applicant has a rigorous Plastic Reduction Plan in place, the plastic footprint calculated in the above process is used as a benchmark and is held to cover the possibility of non-compliance with the PRP, or other unforeseen circumstances), and offsetting established accordingly.

2.2 Plastic Offsetting

Offsetting of the Applicant's plastic footprint must be undertaken via funds delivered to Net Zero Eyecare on a monthly basis at a rate equal to one twelfth of their annual plastic budget. A monthly direct debit from the applicant's bank account to that of Net Zero Eyecare must be set up before certification can be awarded.

Over-payment of greater funds than necessary to cover the applicant's plastic budget is accepted, but the applicant's annual plastic budget must be fully offset before an offsetting payment of less than one-twelfth of the annual carbon budget will be accepted.

3. REQUIREMENTS FOR AUDITING AND ISSUING OF A CERTIFICATE

Eligibility for Plastic Balanced certification must be assessed by a Net Zero Eyecare Approved Auditor. The Approved Auditor will, over the course of an audit conducted in-person or via video-call, ascertain whether, by the end of the audit process, the Applicant meets the criteria necessary for Net Zero Eyecare - Net Zero Plastic certification.

3.1 Application for Audit

The applicant must submit a Net Zero Eyecare Application form, citing for which certification they are applying, confirming that they have completed the required plastic accounting, and accepting Net Zero Eyecare's terms & conditions.

3.2 The Audit Process

The Applicant must undergo an audit conducted by a Net Zero Eyecare Approved Auditor.

The Auditor will conduct an audit in-person or via video-call, so as to physically or virtually view any and all required documents or data.

All verifiable data such as the quantity of products sold and the equivalent plastic mass, must be verified by the applicant showing the relevant data to the Auditor.

If any items included in the Criteria for Certification are deemed "not applicable" by the Applicant, the reason why those criteria are not applicable must be explained by the Applicant.

The breakdown of the applicant's total plastic footprint will be covered during the course of the audit, and the monthly offsetting payment rate will be agreed by the end of the audit.

The Auditor will produce an audit report.

The Applicant will formally accept the audit report, after which the Auditor will send the audit report to the certification body (Net Zero Eyecare).

3.3 Issuing of Certification

The certification body will review the audit report and advise on the conformity of the application.

Except in cases of non-conformity, the certification body will issue the appropriate Net Zero Eyecare certificate(s) for the company and site(s) included in the audit which will be valid for 12 months.

4.4 Renewal of Certification

For the certification to remain valid, the annual audit must be booked prior to the anniversary of the date of certification, and must be conducted within one calendar month of the anniversary.

4. GUIDANCE ON NON-CONFORMITIES

4.1 Plastic Accounting

4.1.1 Minor Non-Conformities in Carbon Accounting

A minor non-conformity occurs when a requirement outlined in the relevant Net Zero Eyecare standard is not met, but without significantly impacting the eligibility of the application. Some examples of minor non-conformities, and recommended actions, are given below:

Non-Conformity

Failure to provide accurate data for an item included within one of the Scopes of plastic accounting, or incorrectly assigning an item as not-applicable, when an accurate figure can be obtained quickly and easily so as not to substantially interrupt the audit process.

Recommended Action

Relevant data is obtained by the Applicant, checked by the Auditor, and integrated into the audit process.

Non-Conformity

Inability or refusal to provide data for an item within one of the Scopes of plastic accounting.

Recommended Action

A likely figure is agreed between the Auditor and Applicant to function in place of accurate data, and then the Net Gain principle is appropriately applied to assign a plastic footprint.

eg1. Applicant is unwilling to provide a number of lens cloths provided to customers per year - one lens cloth per appointment is assumed.

eg2. Applicant is unable to obtain a product plastic footprint from their lens supplier, however they do learn that the swarf created in lens manufacture is incinerated (ie. moved from plastic footprint to carbon footprint). It is agreed that the plastic footprint of the lens is equal to it's finished mass, and the plastic footprint of all lenses sold per year is equal to the average mass of a representative sample of lenses sold multiplied by the number of lenses sold.

The above process is reported fully in the audit report, and it is recommended that systems are put in place to facilitate the provision of a more accurate figure for the following audit.

4.1.2 Major Non-Conformities in Plastic Accounting

A major non-conformity occurs when there is serious deviation from the criteria for certification, significantly impacting the eligibility of the application, or breach of the Net Zero Eyecare terms and conditions, or other activity that threatens the reputation or integrity of Net Zero Eyecare by association.

Some examples of major non-conformities, and recommended actions, are given below:

Non-Conformity

Refusal to provide data for an applicable item within one of the Scopes of plastic accounting, or to agree an alternative proxy figure to use in their plastic budget.

Recommended Action

If the participant is not willing to abide by the criteria for certification, they are ineligible for certification. The audit process is terminated, and existing certification revoked until such time that the Applicant is willing and able to meet the necessary criteria.

Non-Conformity

Omission of a source of plastic waste/pollution, resultant from the Applicant's business activity, that falls within the relevant Scopes of plastic accounting - regardless of whether or not that activity is specifically mentioned in the Net Zero Eyecare - Net Zero Plastic standard.

Recommended Action

Regardless of whether the omission can be considered intentional or accidental, the auditing process will be paused and any active certification suspended until such time that an appropriate audit can be conducted including accurate and sufficient data on the omitted activity. Certification can be again be sought / reinstated when the omitted activity has been fully included in the Applicant's carbon accounting.

Non-Conformity

The Applicant is found to have falsified data in their plastic accounting, resulting in an inaccurate plastic footprint. This is not the same as simply making errors in the accounting or conversion process or as making transparent assumptions; to falsify data is intentional and duplicitous.

Recommended Action

The audit process will be paused and any active certifications suspended. The credibility and integrity of the Applicant must be reviewed by the Auditor and Net Zero Eyecare, and the decision made as to whether the Applicant is welcome to apply for a Net Zero Eyecare certification at all. The Applicant may be suspended from submitting applications for a period of time, and any active NZE certifications revoked.

4.2 Plastic Balancing

4.2.1 Minor Non-Conformities in Plastic Balancing

A minor non-conformity occurs when a requirement outlined in the relevant Net Zero Eyecare standard is not met, but without significantly impacting the credibility of the certification.

An example of minor non-conformity, and recommended action, is given below:

Non-Conformity

Failure to make payments for plastic balancing sufficient to cover their plastic budget to that point in the 12 month certification cycle.

Recommended Action

The active certification is suspended until the correct sum has been paid to Net Zero Eyecare. If the correct sum is not paid within four weeks of the original payment date, this is escalated to a major non-conformity.

4.2.2 Major Non-Conformities in Plastic Balancing

A major non-conformity occurs when there is serious deviation from the criteria for certification, significantly impacting the eligibility of the application, or breach of the Net Zero Eyecare terms and conditions, or other activity that threatens the reputation or integrity of Net Zero Eyecare by association.

An example of major non-conformity, and recommended action, is given below:

Non-Conformity

Greater than four week delay in making offsetting payments sufficient to cover their plastic budget to that point in the 12 month certification cycle.

Recommended Action

The suspended certification is revoked. If the Applicant wishes to re-apply for certification they must do so from the beginning of the application process.

4.3 General Business Activity During Certification

While this standard does not impose any obligatory practices on an Applicant or Certified company outside of plastic accounting and offsetting, the threat of divergent behaviour that could threaten the integrity of the certification must be considered.

4.3.1 Minor Non-Conformities in General Activity

A minor non-conformity occurs when the ideology of sustainability is not implemented, and a company pursues fundamentally unsustainable actions that, if left unchecked, could threaten the credibility of Net Zero Eyecare certification.

An example of minor non-conformity, and recommended action, is given below:

Non-Conformity

Despite having an annual benchmark plastic footprint or reductions plan, established during certification audit or otherwise, a certified organisation's plastic footprint is found to slightly increase over the period of certification.

Recommended Action

It is accepted that some everyday changes in business activity can increase net plastic footprint even while reductions actions are taken in other areas. The reason for increase in plastic footprint is investigated during the next audit, it is justified by the Applicant, any outstanding carbon budget is offset via additional payment to Net Zero Eyecare, and the activity is included appropriately into the following carbon budget.

Non-Conformity

A certificate-holding supplier or manufacturer releases a new plastic-based product or packaging element.

Recommended Action

The certificate holder is given opportunity to justify their choice of material; if there is no viable more-sustainable alternative material available, or if the choice is necessary for delivering eyecare on ethical grounds, no further action need be taken (though a degree of investment into R&D of alternative materials may be suggested).

If no effort to investigate alternative sustainable materials has been made, or if alternative materials are found to be available and not used in favour of a fundamentally unsustainable material, and the choice cannot be defended on grounds of ethically delivering eyecare, this may be escalated to a major non-conformity.

4.3.2 Major Non-Conformities in General Activity

A major non-conformity occurs when there is serious deviation from the fundamental ethos of sustainability, a business activity is pursued with an obviously substantial additional plastic footprint, there is an instance of perceived “greenwashing”, or other activity that threatens the reputation or integrity of Net Zero Eyecare by association.

An example of major non-conformity, and recommended action, is given below:

Non-Conformity

The certified company undertakes an activity that was not covered in the plastic accounting demonstrated at previous audit (such as release a new product line), and has a clear and substantial additional plastic footprint, in which little or no consideration has been given to the use of more environmentally-friendly materials, or is not in-line with delivering eyecare or improving quality of life. This may or may not be accompanied by a public perception that the company is exploiting the certification to unjustly claim that their activity is sustainable or “Net-Zero Plastic”.

Recommended Action

The active certification is suspended with immediate effect while the instance is investigated by Net Zero Eyecare. If NZE find the activity sufficient to warrant immediate inclusion in the company’s plastic accounting in order to maintain the validity of their certification, an audit must be arranged and completed before the suspension will be lifted. If an additional audit cannot be agreed, or it is found that the activity under investigation is so severe as to fundamentally threaten the integrity of Net Zero Eyecare, the certification may be revoked entirely.

6. RECOMMENDATIONS OF NON-COMPULSORY BEST PRACTICE

6.1 Make Sustainability Affordable

An applicant may wish to make their certification - and any other actions in sustainability - more affordable by adjusting their pricing to cover the anticipated costs of certification and offsetting etc. Some may choose to implement a functional 'levy' on the sale of certain items in order to generate revenue to sit in a certain 'pot' allocated to offsetting or other actions.

One advantage of this is that it can quickly help to generate not just the revenue necessary for a monthly offsetting of a company's annual plastic budget, but also generate substantially more that can be included under the banner of "Net Gain" and delivered through Net Zero Eyecare to plastic offsetting programmes without negatively impacting the profitability of the business.

A company paying more in plastic offsetting than is necessary to cover their annual plastic budget is said to be Plastic Negative, and they may celebrate this publicly using their chosen methods of outreach and engagement.

6.2 Team Engagement

There are multiple benefits to companies that fully integrate a culture of sustainability into their business practice. Plastic accounting can be made easier by welcoming insights from diverse team members with specialist knowledge of certain areas of the business. Devising and implementing a reduction plan can be more efficient if the task of identifying reductions opportunities is delegated throughout a workforce.

Even more powerful can be the additional delegation of a Sustainability Officer tasked with monitoring the sustainability practices of a business, and collating the necessary data for annual audits.

This is not to mention the notable positive impacts to team cohesion, and individual autonomy, wellbeing, and sense of impact, that results from making all team members a part of a company's overall sustainability mission.

6.3 Avoid Greenwashing

The concept of greenwashing threatens the integrity and credibility of any certification body, including Net Zero Eyecare, and any certified company. Therefore, we offer the following advice to help and certified company avoid potential greenwashing.

- Speak with humility. One of the most respectable stances an organisation can presently take is *"We're not perfect but we're doing our best while striving to get better"*. So be proud of your achievements, such as certification, but don't over-inflate your claims or pretend that you're beyond room for improvement - even if the means to improve aren't presently available to you.
- Pursue transparency with every claim you make, eg. publish your audit report so that it is available to download from a "Sustainability" page on your website.
- Proudly display your Net Zero Eyecare certificates and certification badges while you have an active certification. Every item that Net Zero Eyecare provides you as a means to demonstrate your certifications includes your unique certificate number, allowing interested parties to verify your certification on the netzeroeyecare.org website.