

RECYCLED PLASTICS TRACEABILITY
CERTIFICATION
AUDIT SCHEME

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I. Focus of *Certification*

Certification aims at recognising responsible use of recycled plastics in products or semi-finished products. It specifies requirements for companies using recycled material in the production of plastic products who wish to claim their recycled content under a comprehensive Certification Scheme.

Certification focuses on the traceability of *Certified Recycled Input* within a *Site* and the calculation of the recycled content shares (pre-/post-consumer) of plastic products or group of products along the whole value chain. Certified *Outputs* and *Sites* may use claims on recycled content according to the document “Use of Claims Guidance”.

Traceability of the material in the different process steps must be verified throughout the whole chain of custody of the material in order to make a claim of recycled content in final products. Therefore, *Certification* may be granted to different companies who play a part in the value chain and hold custody of the recycled plastics including but not limited to compounders, converters, blow moulders, fillers, etc.

The Scheme is developed according to ISO 22095 Chain of Custody – General terminology and models and EN 15343:2007 Plastics. Recycled Plastics. Plastics recycling traceability and assessment of Conformity and Recycled Content.

II. Terms and Definitions

Defined terms are marked in *italics* and start with a capital letter. Terms and definitions relating to this document can be found in Annex 1.

III. References

EN ISO 472:2013 Plastics – Vocabulary

ISO 22095 Chain of Custody – General terminology and models

EN 15353:2006 Plastics – Recycled Plastics – Plastics recycling traceability and assessment of conformity and recycled content

EN 15353:2006 Plastics – Recycled Plastics – Guidelines for the development of standards for recycled plastics.

ISO 14021:2016 (E). Environmental labels and declarations – Self-declared environmental claims (Type II environmental labelling). Second edition 2016-03-15

IV. Types of Certification

IV.1 Initial Certification

Initial Certification should take place in a *Site* who must present production records from the previous 12 months of *Production Process*. This Certification is valid for 1 year.

IV.2 Monitoring Certification

Monitoring Certification should take place in a *Site* who must present production records from the previous 12 months of *Production Process*.

Monitoring Certification will be granted to *Site* when Certification is available from the previous year. This Certification is valid for 1 year.

IV.3 Provisional Certification

Provisional Certification should be issued when a *Site* has been in operation for less than 12 months or there are less than 12 months of production records. A minimum of 3 months of data are required in order to issue a Provisional Certification. This certificate will be valid until data from 12 months is available up to a period of 9 months.

IV.4 Multisite Certification

Multisite Certification should be issued when a production process takes place in two or more separate locations under the same ownership of *Site*. *Site* shall designate one location as main address and contact for the purposes of *Certification*. Both locations must be visited during the audit, listed in the report, and traceability among both locations shall be verified. This Certification is valid for 1 year.

V. Operating Performance Requirements

The auditing criteria is standardised in two categories which define the level of importance and accuracy that *Site* shall achieve in each requirement to succeed in the certification process.

Category type	Meaning
1	Compulsory: <i>Site</i> must achieve the required standard for type 1 categories in order to achieve <i>Certification</i> . Minor discrepancies are allowed in defined circumstances.
2	Important but not essential. A <i>Site</i> must achieve a 50% compliance with category 2 items.

VI. Certification Details

Section 1: Quality System Requirements

1.1 *Business registration*

Company registration document shall be in place and valid. Legal directors of the *Production Plant* shall be identified.

Assessment level	Minor Discrepancy	Evidence required
1	n	y

1.2 *ISO 14000, ISO 9001*

Certificates should be issued by an authorised Certification Body.

Assessment level	Minor Discrepancy	Evidence required
2	n	y

1.3 *Training*

Site shall identify designated personnel who shall be responsible to fulfil the requirements of *Certification*.

Specific training shall be provided to all personnel ensuring their suitability to tasks and responsibilities assigned. The training programme shall be subject to continuous reviews suitably structured and documented.

Assessment level	Minor Discrepancy	Evidence required
2	y	y

1.4 *Register of complaints*

Site shall implement a procedure to guarantee that any complaints received related to the effective implementation of this *Certification* are considered for improvement.

Assessment level	Minor Discrepancy	Evidence required
2	y	n

1.5 Records

Site shall maintain documentary evidence of compliance with this *Certification* requirements and procedures for at least 12 months. Records shall be available in written documents, procedures or automated control systems.

Assessment level	Minor Discrepancy	Evidence required
1	y	y

Section 2: Supplier Evaluation

2.1 Supplier Identification

Each *Batch of Certified Recycled Input* delivered shall be linkable to a *Supplier* and a valid Certification: RecyClass Traceability of recycled content Certification in case of another actor of the value chain (e.g. compounder, converter, etc.) or EuCertPlast Certification or equivalent Schemes based on EN 14353 in case of recycled material from a recycler.

For each *Supplier*, Site shall record at least the following details:

- Name and address of *Supplier*;
- Code and validity period of *Supplier's* Certificate;
- Description of the *Certified Recycled Input* provided;
- Purchasing documentation of *Certified Recycled Input*.

Assessment level	Minor Discrepancy	Evidence required
1	n	y

2.2 Input Records

Record and availability of Certification is kept for all *Certified Recycled Inputs* for the entire time period of material procurement.

Documentation must include: in case of a RecyClass Traceability of Recycled Content Certification, the Certificate and Summary Sheet including the list of Certified products and in case of a EuCertPlast Certification, the Certificate and Annex 7 which includes the list of *Certified Input Material* grades with the corresponding pre-consumer and post-consumer recycled content which is used in the *Site*.

Assessment level	Minor Discrepancy	Evidence required
1	y	y

Section 3: Input Requirements

3.1 Purchase specifications

Batches of *Certified Recycled Input* shall be purchased and booked in against a specification which shall be available for each grade of *Certified Recycled Input* accepted.

Specification shall include at least:

- Polymer type;
- Product Code (identifiable per each individually purchased *Certified Recycled Input*)
- Volume;
- Recycled content information according to *Certified Recycled Input Certification*.

Assessment level	Minor Discrepancy	Evidence required
1	y	y

3.2 Weights and dates of delivery recorded

Weight of all incoming Batches of *Certified Recycled Input* shall be documented at least by freight forms or big bag lists. Additionally, *Product Code* and date of delivery shall be recorded. Weighbridge tickets either from *Supplier* and/or *Site* shall be recorded and stored physically or electronically.

Assessment level	Minor Discrepancy	Evidence required
1	n	y

Section 4: Stock management

4.1 Stock Identification

All incoming *Certified Recycled Input* shall be identifiable with a *Product code* linked to the *Supplier*.

Site may tag big bags, allocate specific storage areas or use a clear silo assignment. Big bags may be stored with the original *Product code* or an internal electronic transcoding.

Assessment level	Minor Discrepancy	Evidence required
1	n	y

4.2 Storage conditions

Products are stored in closed and covered areas.

Assessment level	Minor Discrepancy	Evidence required
2	y	n

4.3 Stock management system

Site shall have a system in place that records all movements in and out of stock (*Certified Recycled Input* and *Output*) and the tonnages of stock present on site at any time. The stock management system includes regrind/scrap material which is recirculated into the production process.

Site shall balance the inventory once a year and keep records and prepare an overview which shall include remaining stock from the previous year, inputs received, inputs still in stock, outputs still in stock and outputs sold.

Assessment level	Minor Discrepancy	Evidence required
1	n	n

4.4 Stock checks

The Site carries out a physical inspection of stock at least once per year to verify that the level of stock shown in the stock management system is correct.

Site shall document and store these inspections.

Assessment level	Minor Discrepancy	Evidence required
1	n	y

Section 5: Production Process

5.1 Production statistics

5.1.1 Incoming Certified Recycled Input

When different *Certified Recycled Input* material streams are co-processed by the Site, a separate accounting of each of these material streams is required.

5.1.2 Subcontracted Processing

Requirements may be found described in section 8.

5.2 Input & Output Records

Records shall be kept of all materials that are inputted into and produced by the *Production Process*. These include:

- i) *Certified Recycled Input*
- ii) Additives & master batches & virgin material or non-*Certified Recycled Input*
- iii) Scrap/regrind material recirculated in the process
- iv) *Output*
- v) Rejections

Assessment level	Minor Discrepancy	Evidence required
1	y	y

5.3 Metrology of test equipment

Procedures for selection, control and calibration of test equipment must be done regularly if present.

Deviations must be recorded. Corrective actions must include an investigation of the causes of the non-conformity and action to prevent the non-conformity in the future.

Assessment level	Minor Discrepancy	Evidence required
1	y	y

5.4 Mass balance calculation

The mass balance calculation is an overview of the material flows of the production process where *Certified Recycled Input* is involved. This central part of the Audit Report shall be reasonably accurate. Any *Minor Discrepancies* of the process shall be explained.

Output may be accounted for in tons (t) or in number of products.

If a Site has been producing *Output* for less than one year or records have been kept for less than one year, a *Provisional Certification* should be issued.

Assessment level	Minor Discrepancy	Evidence required
1	y (see note above)	y

5.5 Production Process Records

Production records shall be kept indicating the times that the production process was operational on a given day and the volume of *Certified Recycled Input* used and *Output* produced. Records should be available for a minimum period of 12 months (i.e. during the evaluation period).

Where this is not the case a *Provisional Certificate* should be issued.

Assessment level	Minor Discrepancy	Evidence required
1	n	n

5.6 Traceability

A system is in place and adequate steps are implemented to ensure traceability throughout the entire production process. Batches of *Certified Recycled Input* into the Production Process can be traced back at any point and anywhere of the production process.

- i. Incoming load report
- ii. Incoming warehouse
- iii. Production process (production documents, machine settings, traceability of connection to the injection presses if applicable)

Assessment level	Minor Discrepancy	Evidence required
1	y	y

Section 6: Output Composition

6.1 Output specifications

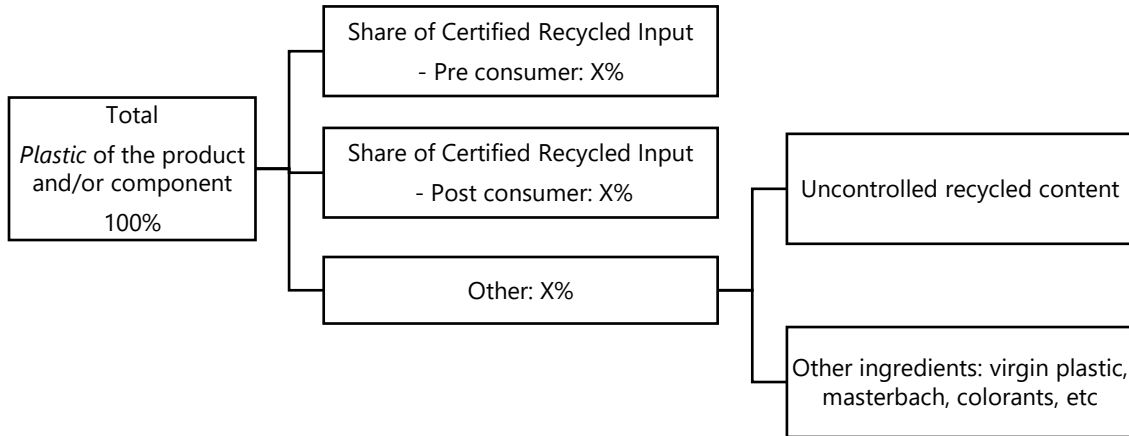
Product descriptions (itemisation – BOM) of the *Output* shall be available (polymer, colour, piece weight, product components, etc.)

Auditor shall complete this section on-site.

Assessment level	Minor Discrepancy	Evidence required
1	n	y

6.2 Calculation of known recycled content

Recycled content shall be expressed in percentage of the total weight of a product or component considering the following categories:



The calculation shall only account for products or group of products using *Certified Recycled Input* for Certification. *Certified Recycled Input* may consist of a particular share of pre-/post-consumer which shall be considered into the calculation.

The calculation must reflect the reality of the recycled content (pre-consumer and post-consumer) present in different products or components aiming for Certification. The ratio between different *Certified Recycled Inputs* should be known for *Output* all the times for a determined volume. The calculation of recycled content may be grouped by different families where the same recipe is used during production. All products must be listed in the Audit Report and Summary Sheet with their respective percentages described.

The calculation shall take into account the plastic weight of the product or component produced at the site. Any *Uncontrolled Recycled Input* or other product ingredients (e.g. virgin plastics, additives, etc.) shall be deducted from the calculation. Non-plastic materials should be considered in the calculation (e.g. inks, adhesives, coatings, barriers, etc.).

The auditor shall calculate the recycled content of a product, group of products or component according to ISO 14021:2016 using the described formula:

$$x (\%) = \frac{A}{P} \times 100$$

X is the share of pre-consumer or post-consumer material which should be reported separately;

A is the mass of *Certified Recycled Input*;

P is the total mass of a product (or group of products).

The recycled content for the different products/family of products shall be reported in the Audit Report and Summary Sheet for pre-consumer and post-consumer recycled content.

The use of the logo on-product¹ will be reserved for final products pledged on the market where the different plastic components of the final product will be considered for the final calculation. More information on how to report the recycled plastics results available in the document “Use of Claims”.

On the other hand, components or semi-finished products can communicate their recycled plastics content via off-product communications.

Assessment level	Minor Discrepancy	Evidence required
1	n	y

6.3 Plausibility check

The plausibility of the following figures shall be verified:

- i. Proportions according to product formula
- ii. Verification of the purchase quantity of the *Certified Recycled Input* used
- iii. Verification of *Output* produced
- iv. Purchases (t) > Consumption (t)

All calculations shall consider any stock changes and rejects.

Assessment level	Minor Discrepancy	Evidence required
1	y	y

Section 7: Output Requirements

7.1 Output Specifications

Sales invoices of Output shall include at least:

- Name and address of the customer;
- Date when the invoice was issued;
- Product code and description of the Output sold;
- Quantity of Output;

¹ More information available in the document “Use of Claims”.

Assessment level	Minor Discrepancy	Evidence required
1	n	y

7.2 Record of sales

Site shall keep record and evidence of *Output* sales.

Procedures are in place to monitor and control the destination of the *Output*.

Assessment level	Minor Discrepancy	Evidence required
1	n	y

Section 8: Subcontracting

8.1 Control of Subcontracted Processing

Records shall indicate when *Certified Recycled Input* shall be sent for *Subcontracted Processing*.

Site shall record at least:

- i) The date *Certified Recycled Input* was sent for *Subcontracted Processing*;
- ii) The company name and address of the party carrying out *Subcontracted Processing*;
- iii) The grade of *Certified Recycled Input* and tonnage sent for *Subcontracted Processing*.

Assessment level	Minor Discrepancy	Evidence required
1	n	y

8.2 Subcontractor's Certification

Subcontracted Processing shall take place in facilities holding *Certification*. Copies of the subcontractor's certificates shall be presented.

Any processing taking place in non-certified companies shall not be considered in the recycled content calculation of *Output*.

Assessment level	Minor Discrepancy	Evidence required
1	n	y

8.3 Record of volumes

Site shall maintain track and record *Batches* (or parts of *Batches*) of *Recycled Certified Input* are sent for *Subcontracted Processing*.

Supplier shall be informed in writing on a case by case basis or for an agreed tonnage of *Certified Recycled Input* over a period of time.

Note: *Site* is not required to inform *Supplier* when other grades of recycled plastic or by-products are sent to third parties for production.

Assessment level	Minor Discrepancy	Evidence required
2	n	n

VII. Annex 1: Definitions

Site

Company applying for *Certification*.

Auditor

Accredited person to perform the audit to grant *Certification*.

Supplier

Company providing *Certified Recycled Input*.

Certification

Certification under this Scheme.

Batch

Quantity of material regarded as a single unit and having a unique transaction code.

Product Code

Unique transaction code for an incoming input *Batch* of material.

Certified Recycled Input

Batches of certified material identifiable with a unique transaction code for which *Site* is applying for *Certification*. *Certification* must be granted by EuCertPlast or an equivalent Certification Scheme based on EN 14353 for recycled flakes or pellets or this same Certification for traceability of recycled content by RecyClass.

Uncontrolled Recycled Input

Batches of recycled material originated in a non-certified Supplier and/or without traceability.

Known Recycled Content

Percentage by weight of *Certified Recycled Input* in *Output*. It must be defined between *Pre-consumer Material* and *Post-consumer Material*.

Output

Material, semi-finished product or product produced by the *Production Process* for which *Certification* is being applied for.

Production Process

Process producing an *Output* for which *Certification* is being requested.

Subcontracted Processing

Certified Recycled Input delivered to *Site* which is toll produced by a third-party company also certified under *Certification* where *Site* retains ownership of *Output* from the third-party company.

Plastic

Material consisting of a polymer as defined in point 5 of Article 3 of Regulation (EC) No 1907/2006, to which additives or other substances may have been added, and which can function as a main structural component of final products, with the exception of natural polymers that have not been chemically modified.

Post-consumer material

Term describing material, generated by the end-users of products, that has fulfilled its intended purpose or can no longer be used (including material returned from within the distribution chain). Note that the term “post-use” is sometimes used synonymously.

Pre-consumer material

Term describing material diverted from the waste stream during a manufacturing process. Note that this term excludes re-utilized material, such as rework, regrind or scrap that has been generated in a given process and is capable of being reclaimed within that same process. The term “post-industrial material” is sometimes used synonymously.

Off cuts, scrap, regrind material

Term describing material reprocessed within the same *Production Process*.

Minor Discrepancy

A relatively small discrepancy found during the audit which the Recycler has 3 months to rectify. The guidance notes explain what is considered to be a minor discrepancy, where applicable. Where a discrepancy is not rectified to the satisfaction of the auditor within 3 months Certification should be withdrawn.