

RECYCLASS RECYCLABILITY CERTIFICATIONS **QUALITY MANAGEMENT & PROCEDURES**

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1 Introduction

This document lays out quality management systems and procedures to obtain a RecyClass Design for Recycling *Certification and Recyclability Rate Certification*.

RecyClass Certifications offer reliable assessments of the recyclability of a packaging design based on the RecyClass Design for Recycling Guidelines¹ and the “RecyClass Recyclability Methodology”².

2 Certification Development and Maintenance

RecyClass Certifications are owned, managed and developed by RecyClass who ensures adequate documentation for the maintenance and improvement of the Certification.

RecyClass experts regularly review all available documentation including the Certification methodology, audit report templates, and quality management systems and procedures according to recent developments in the recycling industry and the results of recyclability laboratory testing. Any changes and updates are implemented by the RecyClass Steering Board which is composed by recyclers and RecyClass Platform representatives as laid out in the document “RecyClass Internal Procedures”. New updates are communicated to all accredited Certification Bodies via the figure of the lead auditor.

3 Official Documentation

Applicants and Certification Bodies must use the most recent versions of the documents “RecyClass Application Form”, “RecyClass Specification Sheet”, “Audit Report” and “Final Certificate”. Audit Reports and Certificates will be issued in English.

Each Audit Report includes specific information related to a packaging’s design and its compatibility with recycling. The combination of different elements of a package result in the final recyclability assessment which will be reported in the Certificate. Additionally, the Audit Reports offer guidance to identify possible areas of improvement to the packaging’s design recyclability.

¹ RecyClass Design for Recycling Guidelines available at <https://recyclass.eu/recyclass/design-for-recycling-guidelines/>

² RecyClass Recyclability Methodology available at <https://recyclass.eu/recyclass/methodology/>

4 Certification Bodies

RecyClass Certifications are issued by recognised Certification Bodies duly represented by an accredited auditor who operates according to the procedures described in this document and the requirements included in the document “Certification Bodies and Auditors Requirements”.

Certification Bodies ensure that the Applicant complies with the Certification Terms of Use as described in Annex I of this document.

Communication between Certification Bodies and RecyClass must be kept at a regular basis. Any new Certification requests must be communicated to RecyClass.

5 Data Confidentiality

Confidential information shared between the applicant and the Certification Body during the auditing process must be protected by the signatory of a Non-Disclosure Agreement between both parties.

RecyClass employees and subcontractors must also sign a Non-Disclosure Agreement with RecyClass.

6 Certificates Quality Control

A control system guarantees the quality and rigour of all Certifications via an internal sample check procedure which ensures coherence and consistency among all issued Audit Reports.

A RecyClass expert will select several certificates annually for a sample check. The Certificates will be anonymised for this procedure.

Audit Reports will be reviewed by a third-party auditor who may signal the existence of a non-conformity within the Audit Report which will have to be amended. The review of the Audit Reports is made anonymously using a third-party code to preserve the confidentiality of the Applicant.

The third-party auditor may also report to the Steering Board any essential non-conformities or non-compliant behaviour of a specific auditor or Certification Body according to the procedures described in the document “Auditors and Certification Bodies Requirements”.

7 Complaints and appeals

Appeals against a Certification decision or complaints about a Certification Body should firstly be sent to the Certification Body. The Certification Body must address all inquiries and maintain records of them.

If these appeals and complaints are not, or cannot be, resolved by the Certification Body, the issuer or the Certification Body can address them to RecyClass directly.

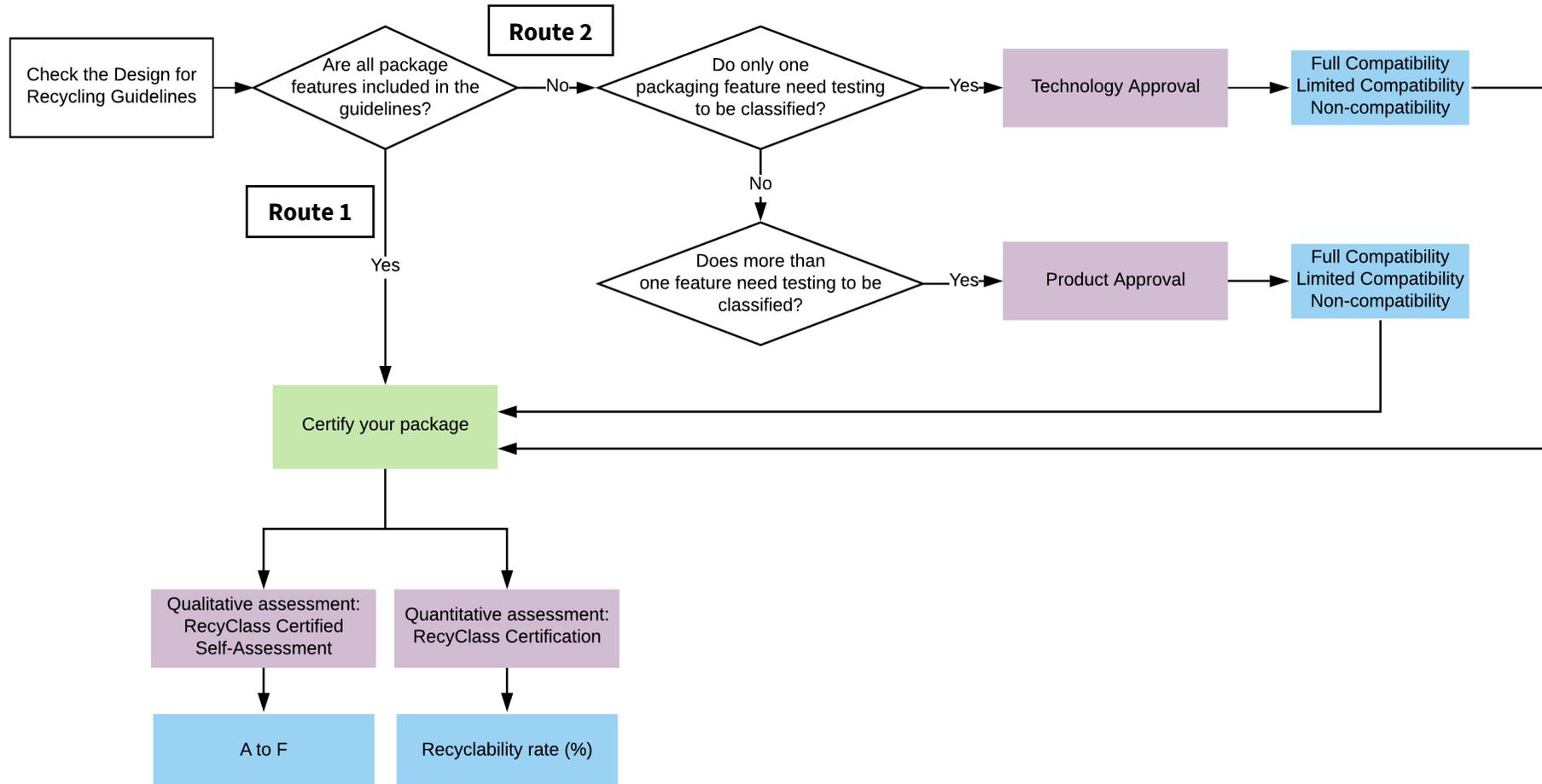
8 Eligibility to apply for a Certification

Any plastic packaging product which falls under the scope of the RecyClass analysed packages and materials may apply for Certification. Namely, packaging products must include all their different components and must be either pledged on the market or yet to be introduced with no further alternations to be made to its design.

Plastic products similar in composition and properties to packaging can also be object of this Certification. These products include but are not limited to garbage or carrier bags.

9 Certification Process

Before applying for a Certification, the applicant should check the Design for Recycling Guidelines to verify whether the assessment of a packaging recyclability within a RecyClass Certification is possible. Alternatively, the applicant can apply for a Technology/Product Approval. A decision tree in Figure 1 describes the steps of this procedure. Additional detailed information may be found in section 9.1.



Route 1:

A packaging follows route 1 when all packaging features can be found in the Design for Recycling Guidelines. An applicant can request an official Design-for-Recycling Certification or Recyclability Rate Certification by submitting a Certification Application Form, along with the RecyClass Self-assessment Report to a recognised Certification Body.

Detailed information about the material composition of a given package must be provided to the auditor within the document “Product Specification Sheet³”, to ensure sound, scientific recyclability analysis as packaging often consists of multiple components with specific functionalities. Depending on the complexity of each packaging, the auditor can request more detailed information on each component (e.g. bottle, decoration, cap, closing lid, seal, adhesive, ink, printing or other). Additionally, sorting tests may be requested. The auditor can for instance, request information on basic packaging components such as description, weight or density, as well as details on the methodology of connection between components (mechanically, fully glued, laminated, etc.). Furthermore, for the completion of the audit, the applicant must provide samples of the packaging assessed. The amount of samples requested will depend on the complexity of the packaging and should be at least 10 units.

Upon the completion of the audit, the Applicant will receive a Draft Audit Report issued by the Certification Body outlining the results. The Applicant may review this Draft Report and provide comments to the Certification Body if any. The final Certificate will be issued by the Certification Body on behalf of RecyClass duly signed by the auditor. Communication on the Audit results and the Certificate must follow the guidelines included in the document “Use of Claims Guidance”.

Route 2:

When one or more of the packaging element are not included in the Design for Recycling Guidelines, additional testing will be required. The Applicant may contact RecyClass and request a Technology or a Product Approval following the Procedures described in the document “Internal Procedures”. Any additional testing must be determined by RecyClass.

9.1 Auditing Procedure & Correspondence

Upon receiving a request for a RecyClass Certification from an Applicant, the Certification Body will prepare a letter and budget proposal to be sent prior to the audit introducing the RecyClass Certifications and the purpose of the audit.

The budget proposal must include a provisional planning of the assessment including tests (if foreseen), the provisional dates for delivering of the first Draft Report, and a finalised Audit Report with its associated Certificate(s).

³ Product Specification Sheet available at www.recyclclass.eu

Upon acceptance of the Applicant, the Certification Body and Applicant will officialise their agreement and sign a Non-Disclosure Agreement in order to safeguard the confidentiality of the information provided by the Applicant.

In case of a successful audit, the Certification Body will issue:

- Draft Report (electronic copy): Issued no later than 3 weeks after the audit date. The applicant will dispose of 2 weeks to make comments.
- Audit draft Report: Sent by the Certification Body as an anonymous report to the quality controller for quality review (if applicable).
- Audit Report (secured electronic copy and printed copy x2): The Certification Body will issue the final Audit Report.
- Certificate: The Certification Body will provide the final certificate signed by the accredited auditor. An Annex will include a list of any equivalent packages. The Certificate will be shared with RecyClass who will update this information to the RecyClass website upon the Applicant's approval.

9.2 Detailed process overview

Process	Documentation	Participants
<p><u>Application submission</u></p> <p>The applicant submits a certification request by sending a signed Application Form along with a RecyClass Self-Assessment Report to a recognised Certification Body of their choice.</p>	<p>Signed Application Form, RecyClass Self-Assessment report</p>	<p>Applicant, Certification Body</p>
<p><u>Application approval and contracting of the assessment</u></p> <p>The Certification Body verifies without an NDA in place that the package can be certified and no new Technology/Product Approval is necessary. If this would be the case, the Certification Body sends a letter and budget proposal to the Applicant. Both parties contractualise and sign an NDA to protect sensitive information.</p> <p>If a new Technology or Product approval is needed, the Certification Body will address the Applicant to RecyClass. Recyclclass will guide the Applicant through the testing procedure</p>	<p>Letter to the applicant & budget proposal, NDA</p>	<p>Applicant, Certification Body, RecyClass</p>

<p>described in the document “Internal Procedures”.</p> <p>The application is verified, upon which an NDA is signed to protect the applicant’s rights.</p>		
<p><u>Communication with RecyClass & data management</u></p> <p>Certification Bodies must communicate to RecyClass of any new applications specifying the type of Certification requested. RecyClass will subsequently assign series numbers to each Certification which must be included on the Audit Report and its associated Certificate. If needed, RecyClass will provide a third-party code for the verification of the Audit Report.</p>	<p>Certification code, third-party code</p>	<p>Certification Body, auditor, RecyClass</p>
<p><u>Data transfer & testing</u></p> <p>The applicant submits the Product Specification Sheet including additional data pertaining to the properties of the packaging in questions. The applicant will provide samples as defined by the Certification Body in the contract.</p>	<p>Product Specification Sheet</p> <p>Packaging samples</p> <p>Additional information if any</p>	<p>Applicant, Certification Body</p>
<p><u>Equivalent Packaging</u></p> <p>Applicants may also request to include an Annex to the Certificate and to the Audit Report listing equivalent packaging where the use of claim may be used. Equivalent packages may be the same in terms of material and may only vary in size; or form to the original package (suitability must be evaluated by the auditor). Product Specification Sheets may be provided to the Certification Body.</p>	<p>Product Specification Sheet</p>	<p>Applicant, Certification Body</p>
<p><u>Evaluation Assessment</u></p> <p>Upon the completion of the analysis, the auditor will issue an Audit Report on behalf of the Certification Body to the applicant, stating the results.</p>	<p>Draft Certification Report, Final Certification, Final Certificate</p>	<p>Applicant, Certification Body</p>

<p><u>Quality Control</u></p> <p>If applicable, review of the anonymised Certification Report by the RecyClass responsible body.</p>	<p>Certification Report</p>	<p>Certification Body, RecyClass responsible body</p>
<p><u>Certificate release</u></p> <p>The Certification Body finalises the Certification Report and prepares the Certificate which should be shared with RecyClass. Along with the certificate, the recyclability logo and the guidelines on its use will be provided to the applicant.</p> <p>Information on certified packaging will be published on the RecyClass website upon the approval of the applicant.</p> <p>Further communication campaigns can be developed in coordination with the applicant. All the campaigns will have to be approved by the applicant.</p>	<p>Certification Report</p> <p>Certificate</p> <p>“Use of Claim Guidance”</p> <p>Logo</p>	<p>Applicant, RecyClass team, Certification Body</p>

10 Issuance, Withdrawal, Validity and Renewal of Certification

Once an audit is completed, the Certification Body issues a RecyClass Certificate within a period of 8 weeks. Certification Bodies must always use official RecyClass document templates to procure the Audit Report and additional documentation to the applicant. Certificates must state the issuing Certification Body and must be signed by the auditor in charge of the audit.

Once issued, the certificate will be valid for a period of three years, given that no alterations to the packaging design or composition are made. If alterations are made to a packaging, the applicant must immediately notify its Certification Body and RecyClass as specified in Annex I: Certification Terms of Use.

The issued certificate will only be valid for the specific packaging that has been audited, any variations will have to be individually verified and included in the list of equivalent packages found in the Audit Report and Certificate.

Upon the expiry of a certificate or in case of alterations to the original packaging, a monitoring audit should be conducted. The validity will subsequently be renewed for additional three years. Monitoring audits will also apply to any variations of the packaging that has previously been certified.

11 Cost of Certification

The cost of audits is incurred by the applicant and consists of two separate items:

- RecyClass fee of 150 € for the first 30 certificates from the same Applicant and 100 € as from the 31st certification. The fee covers administration and data management costs.
- Certification Body fee which is set independently by Certification Bodies; therefore, the costs may vary. The budget proposal must be provided to the Applicant in advance.

12 Communications

Audit results can be used on any communication material referring specifically and exclusively to the certified packaging – for instance on websites, social media platforms or the packaging itself. The information and conditions of the document “Use of Claims Guidance” apply. The elements of the logo cannot be altered in any way and must be used together as a whole. Where adequate, the logo in black or in negative can be used. The guidelines and requirements included in the document “Logo Design Guidelines” apply.

RecyClass may use aggregated data referred to the results of the RecyClass Certificates for communication purposes. Individual Certificates may be added to the directory of Certified packages available online upon the approval of the applicant.

To protect the integrity of the certification and the validity of the certified packaging claims, it is important that the logos are used correctly and only in relation to the packaging that has been certified. If you think the logo is being misused, please report it immediately to info@recyclclass.eu.

13 Annex I: Terms of Use of Certification

Applicants of any of the RecyClass Certifications must ensure compliance with the criteria below throughout the course of the audit and the duration of a certificate's validity. The following terms are in line with the requirements laid out in ISO 17065 on Requirements for bodies certifying products, processes, and services.

- Applicants must fulfil all Certification requirements as described in their Audit Report. Any relevant changes must be communicated to the Certification Body and RecyClass immediately.
- During an audit, applicants must provide all necessary documentation to conduct the assessment.
- Applicants must maintain records and address any complaints submitted related to a valid Certification.
- Applicants must not use any RecyClass Certificate in a manner which could bring RecyClass and its Certification Bodies into a dispute.
- In case of withdrawal of a Certificate by the Certification Body, applicant must stop the use of claim granted by such Certification in any channel.
- Distribution of a RecyClass Certificate or Audit Report must include all sections and annexes. Partial documents must not be used.
- Guidelines provided by the document "Use of Claim" are strictly followed.
- Applicants must inform the relevant Certification Body of any changes that may affect the ability of a package to conform with the Certification requirements.

14 Annex II: Glossary

Applicant

Company applying for Certification.

Packaging

Product assessed applying for Certification.

Packaging element

Component or feature of a packaging. E.g. decoration, pump, handle, barrier, etc.