

RECYCLASS RECYCLED CONTENT TRACEABILITY CERTIFICATION **QUALITY MANAGEMENT & PROCEDURES**

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1 Introduction

This document lays out quality management systems and procedures to obtain a *RecyClass Recycled Content Traceability Certification*.

The Certification offers a reliable third-party verification of the recycled content material traceability across the whole value chain; thus, validating the traceability of the material and the origin of the waste.

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 Audit Scheme, Audit Report templates, and Quality Management Systems and procedures according to available information and current practices within the industry to ensure traceability and chain of custody of recycled materials. Any changes and updates are implemented by the RecyClass Steering Board which is composed by representatives of the RecyClass Platform 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 “Recycled Content Traceability Certification Scheme”, “Audit Report” and “Final Certificate”. Audit Reports and Certificates must be issued in English.

Each Audit Report includes information regarding the certified plant and list of products/family with its corresponding recycled content. This information is equally reported in the Final Certificate.

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.

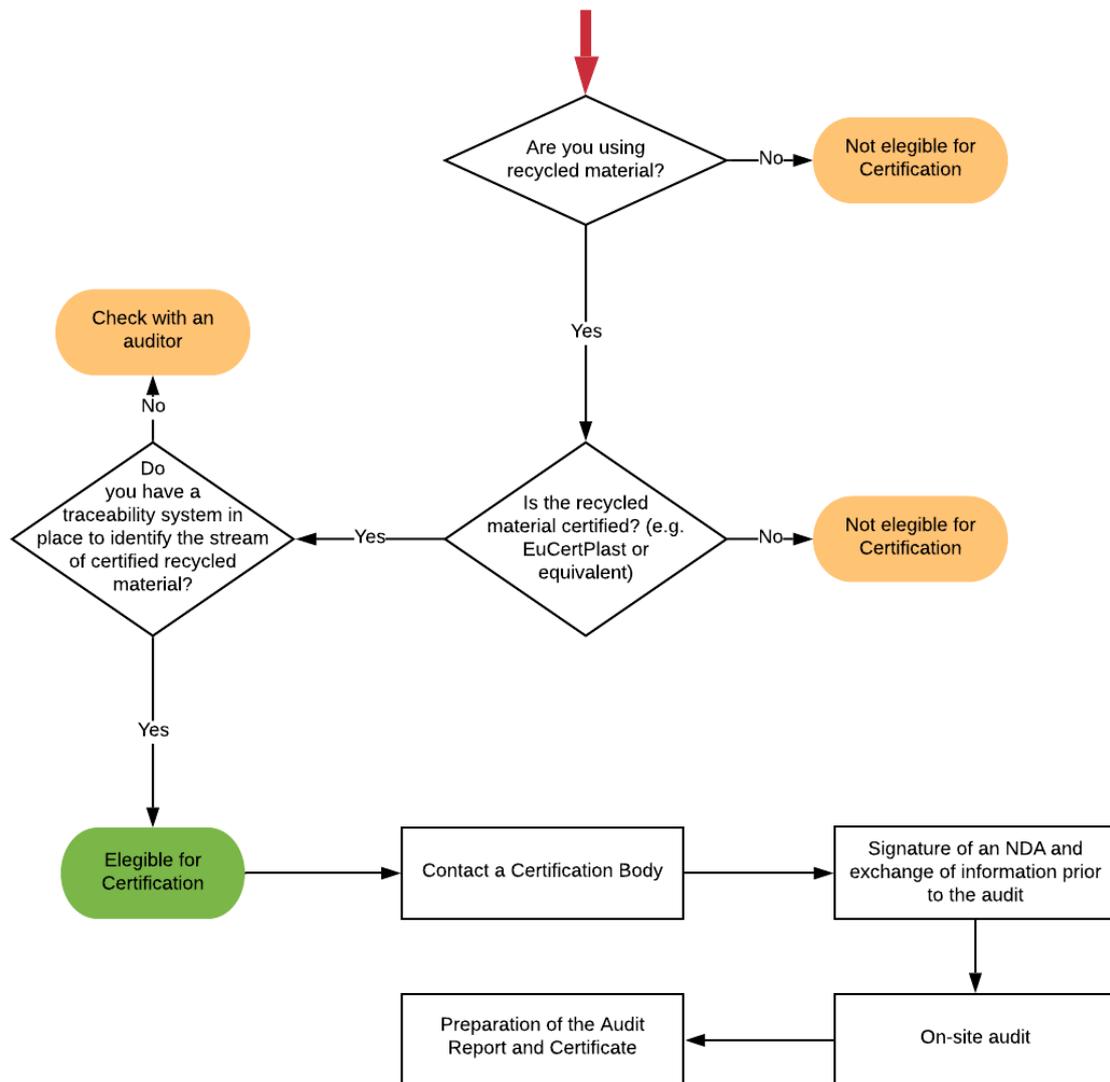
8 Eligibility to apply for a Certification

Any plastic product may apply for Certification. Namely, semi-finished or finished products or components which are either ready for commercialisation or are still under the control of the value chain and sold B2B.

9 Certification Process

Potential Applicants should first check their eligibility for Certification according to Figure 1. The Applicant should start the Certification process by contacting one the accredited Certification Bodies who will provide the necessary information and documentation to set up the audit.

Figure 1. Eligibility and Certification Process Steps



Upon receiving a request for a Recycled Content Traceability Certification, the Certification Body will prepare a letter and budget proposal to be sent prior to the audit introducing the Certification and purpose of the audit.

The budget proposal must include a provisional planning for the audit, the provisional dates for delivering of the first Draft Report, and a finalised Audit Report with its associated Certificate.

Upon acceptance of the Applicant, the Certification Body and Applicant will start the auditing procedure with the signature of a Non-Disclosure Agreement. The Certification Body will provide a list

of all information that the Applicant must make available to the auditor prior the agreed audit date that will allow a successful on-site audit.

Documents and licenses to be prepared prior to the audit include but are not limited to:

- Operating licenses;
- ISO or EMAS certificates;
- Weighbridge certificate;
- Insurance policies;
- Company organogram;
- Job descriptions of key staff (supervisor level or above);
- Staff qualification certificates;
- Details of training programs (technical or quality management related) and staff attendance at these;
- Incoming recycled input specifications;
- Recycled material supplier’s Certification;
- Production logs for Production Process and associated management reports;
- A report detailing all inputs into the Production Process over the past 12 months related to the recycled content subject to Certification;
- A report detailing output with recycled content over the past 12 months;
- Output specifications;

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

- Draft Report (electronic copy): Issued no later than 6 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 the products or families of products included in the Certification. The Certificate will be shared with RecyClass who will update this information to the RecyClass website.

The details of the information exchange between the Applicant and the Certification body are described in section 9.1.

9.1 Detailed Process Overview

Process	Documentation	Participants
<u>Application submission</u>	-	Applicant, Certification Body

<p>The applicant submits a Certification request to a recognised Certification Body of their choice.</p>		
<p><u>Application assessment</u></p> <p>The Certification Body provides general information about the Audit Scheme, a proposed planning, and a quote to the Applicant for the auditing process.</p> <p>The Applicant and the Certification Body will sign an NDA to safeguard the confidentiality of their process.</p>	<p>Letter to the applicant & budget proposal, NDA</p>	<p>Applicant, Certification Body</p>
<p><u>Pre-audit correspondence exchange of information</u></p> <p>The Applicant provides to the auditor information regarding the process needed for the Audit Report prior to the on-site audit.</p>	<p>Data of the process</p>	<p>Applicant, Certification Body</p>
<p><u>Communication with RecyClass & data management</u></p> <p>Certification Bodies must communicate to RecyClass of any new applications specifying the name of the company requesting Certification. 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, RecyClass</p>
<p><u>Onsite Audit</u></p> <p>The accredited auditor from a Certification Body visit the plant upon agreeing a date with the Applicant to verify the traceability and systems implemented in the site according to the Audit Scheme.</p>	<p>Audit Scheme</p>	<p>Applicant, Certification Body</p>
<p><u>Audit Report Preparation</u></p> <p>After the onsite audit, the Certification Body will prepare the final Audit Report. The draft may be shared with the Applicant to clarify any questions.</p>	<p>Audit Report</p>	<p>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>Anonymised Audit Report</p>	<p>Certification Body, RecyClass quality controller</p>
<p><u>Certificate release</u></p> <p>The Certification Body finalises the Audit Report and prepares the final Certificate using the code provided by RecyClass.</p> <p>The Certification Body will also provide the Use of Claims Guidance to the Applicant detailing how the results of the audit may be communicated.</p> <p>The Certification Body will share the final Certificate with RecyClass and communicate the finalisation of the auditing process. RecyClass will include information about the certified company on the website. Communication of the granted Certification can also be coordinated with the Applicant.</p>	<p>Audit Report; Certificate; Use of Claim Guidance</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 6 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 one year, given that no significant changes to the process are made. The issued Certificate will be valid for the process and products listed in the Certificate. Additional products with recycled content or modification of the recycled content in a certified product must be communicated to the auditor to amend the Certificate.

Upon the expiry of a certificate a monitoring audit should be conducted. The validity will subsequently be renewed for additional year.

11 Cost of Certification

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

- RecyClass fee of 150 € for 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 – for instance on websites, social media platforms or the products with certified recycled material themselves. 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 data of the RecyClass Certificates for communication purposes. The list of certified sites will be added to the website.

To protect the integrity of the certification and the validity of the claims, it is important that the logos are used correctly. 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.