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RECYCLASS INTERNAL PROCEDURES

Version 2.0

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1 Introduction

RecyClass is a technical initiative aiming at enhancing and evaluating the recyclability of plastic packaging through various activities. RecyClass efforts focus on the development and maintenance of methodologies and guidelines to assess the recyclability of plastic packaging. For this purpose, RecyClass developed the Recyclability Methodology, Design for Recycling Guidelines and Recyclability Evaluation Protocols. These documents serve as a basis for the development and implementation of the RecyClass online tool, Recyclability Certifications and Technology Approvals.

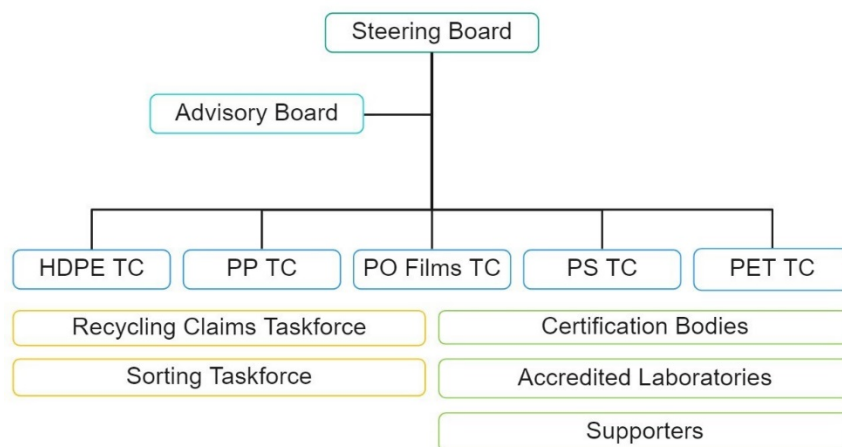
Additionally, RecyClass was constituted to provide a neutral and transparent ground for discussion with the representation of the whole plastics value chain. RecyClass activities focus on giving a detailed and personalised assessment to member companies to improve the recyclability of their plastic packaging.

RecyClass structure and functions can be found described below.

2 Roles & Tasks distribution in RecyClass

RecyClass is composed by the Steering Board (SB); the Advisory Board (AB); five Technical Committees (TC) per PO films, HDPE, PP, PET and PS; Taskforce on Recycling Claims and Sorting as well as a group of Supporters, Certification Bodies and Accredited Laboratories. The RecyClass Team team offers secretariat functions across all groups. The interaction of the different groups can be found in Figure 1.

Figure 1. RecyClass Organisation



2.1 Steering Board

The RecyClass SB is composed by a minimum of 6 members including the chairman of RecyClass and three chairmen of the Technical Committees. An extra recycler from each of the WG may also be part of the RecyClass SB upon the approval of the chair. Additionally, the AB appoints 3 representatives, including the AB chairman, to the SB approved by the SB chair. Extension or modification of the SB composition is under the responsibility of the SB and must be approved by all these members.

All SB participants represent RecyClass and report only to them within the boundaries of the Internal Confidentiality Agreement. SB will appoint a Chair to support and ensure proper functioning of RecyClass. The Chairman must be a recycler appointed by the MC of PRE and elected during the PRE General Assembly. Each member of the SB is elected for 2 years. If a member vacancy occurs for any reason, a new representative will be nominated by the Chairman.

The SB meets at least once every quarter. The decisions of the SB shall be approved by a majority vote of the members. If a SB member cannot attend to a decision-making meeting for any reasons outside that meeting, decision can take place with other means such as phone or email. All requests for a decision should be returned within 2 weeks of receipt or the decision will be deemed to be accepted. The Chairman will have the casting vote.

The meeting minutes will be circulated via email to the participants within 30 days of the meeting. Participants will have 2 weeks to submit comments/amendments to RecyClass Team. After that period, the minutes will be deemed approved.

The RecyClass SB is established to:

- Define the priorities of RecyClass (strategic level)
- Promote RecyClass at events when agreed, e.g. by giving speeches to conferences
- Approve applicants for the RecyClass Membership
- Create new Technical Committees
- Create Taskforces on specific topics
- Validate recommendations on recyclability evaluations of the TCs
- Approve documents for external communication
- Settle and keep up to date the standard third-party agreement document and the Non-Disclosure Agreement (NDA) using the support of a lawyer if required
- Prepare an Annual Activities Report from RecyClass together with RecyClass Team to report to the AB.

The Chair of RecyClass SB is appointed to perform the following tasks:

- Steer the work that needs to be done by the SB
- Promote RecyClass at events when agreed, e.g. by giving speeches to conferences
- Chair SB meetings and coordinate with RecyClass Team to draft the Agenda

2.2 Advisory Board (AB)

The AB is constituted by Platinum members of RecyClass. The AB meets formally (physically or online) at least once every quarter. The AB will appoint a Chairman which is elected by a period of 2 years. In case of vacancy, a new Chairman will be appointed. The Chair of the AB steers the work in the AB and serves as a communication point between the AB and the SB. The Chairman of the AB has a seat in the RecyClass SB. Additionally, up to 2 representatives of the AB are appointed to the RecyClass AB who are approved by the SB. The Advisory Board also counts with 2 voting seats on the Technical Committees.

If a participant cannot attend to a decision-making meeting for any reasons outside that meeting, decision can take place with other means such as phone or email. All requests for a decision should be returned within 2 weeks of receipt or the decision will be deemed to be accepted. The chair of the AB will have the casting vote. An AB participant shall attend all meetings or present a justified excuse. AB representatives have 2 weeks

to submit comments and/or amendments to meeting minutes, afterwards the minutes will be deemed approved.

The RecyClass AB is established to:

- Raise topics of discussion to the SB.
- Discuss and monitor the evolution of recyclability and propose and develop trends in plastic packaging.
- Review and discuss the annual report of activities from RecyClass.

2.3 Technical Committees (TC)

RecyClass is constituted by five different TCs per polymer type: PO films, HDPE, PP, PET and PS. Each TC is composed by at least 5 participants: The chair or vice-chair of the corresponding PRE WG who will chair the committees, 2 additional representatives of recyclers and 2 representatives of the AB. The Chairman approves the participation of other recyclers and AB experts in the committee. Every member of the TC is elected for 2 years.

TC meets (physically or online) at least once every quarter in closed sessions. The TC can invite external experts, if required for specific topics or assessments. Confidential information shall only be discussed when an NDA is set in place with all present participants. The decisions of the TC shall be approved by a majority vote of the members. If a participant cannot attend to a decision-making meeting for any reasons outside that meeting, decision can take place with other means such as phone or email. All requests for a decision should be returned within 2 weeks of receipt or the decision will be deemed to be accepted. The Chairman will have the casting vote. A TC participant shall attend all meetings or present a justified excuse. If a TC participant disregard its duties in the group, the Chairman reserves the right to appoint a substitute.

TC Representatives have 2 weeks to submit comments and/or amendments to meeting minutes, afterwards the minutes will be deemed approved.

The TCs are established to:

- Update Design for Recycling Guidelines where appropriate according to new findings with the support of the corresponding PRE WG.
- Submit opinions, proposals and recommendations to the SB.
- Develop and publish Evaluation Protocols where appropriate.
- Support to the auditor in the Product Certifications in case of uncertainties.
- Conduct the technical aspects of the assessment procedure as described in section 3.4, 3.6, 3.7 and 3.8 for applicants of the Recyclability Evaluation Protocol.
 - Assess plastic packaging concepts using the most recent available information and technical data.
 - Issue technical opinions based on a review of test results and provide conclusions and recommendations (incl. communication).

Each TC chair is established to:

- Chair TC meetings and lead assessment procedures for recyclability evaluations.
- Draft the agenda of the meetings together with RecyClass Team.
- Approve meeting minutes.
- Steer the work in the TC.

2.4 Taskforces

A taskforce is a group of RecyClass experts established by the SB. A taskforce must have a specific transversal topic of discussion that the group has to resolve. All decisions of a taskforce must be validated by the RecyClass SB. Taskforces are established for a defined period of time but can be reactivated regularly to follow up any possible changes.

A taskforce is established to:

- Following the mandate of the SB, address a specific topic and propose a solution.

2.5 Supporters

Supporters are organisations which are actively supporting and implementing the work done by RecyClass. Supporters must submit a letter of intent to the RecyClass SB who must approve their addition to the membership. Supporters can join Technical Committee meetings and Advisory Board meetings as guests of the chairman. Supporters participate in the Supporters meetings group which are organised regularly. Supporters' membership is not subject to a fee and is open to any organisations, which are not directly involved in plastic manufacturing, transformation, or distribution. Raw material producers, converters, brand owners, retailers are invited to join RecyClass as members.

Supporters group are established to:

- Raise topics of discussion to the TCs and AB.
- Offer counsel to the TCs and AB according to their area of expertise.
- Promote and support RecyClass guidelines and methodologies within their membership and/or collaborators.

2.6 Certification Bodies

Certification Bodies are independent organisations accredited to issue Recyclability Certifications according to the methodologies of RecyClass. Certification Bodies signed a Partnership Agreement with RecyClass, and its auditors attended the RecyClass Auditors Accreditation Course¹.

Certification Bodies will meet at least once a year in order to bring their field experience to the continuous improvements of the RecyClass methodologies. Certification Bodies can be invited to Technical Committee meetings upon the approval of the chairman. Certification Bodies do not pay a membership fee. Requirements to join can be found in the document *Requirements for Certification Bodies and Auditors*².

The Certification Bodies group is established to:

- Suggest improvements to the RecyClass Recyclability Methodology and assessments.
- Provide their expertise to the Technical Committees and Advisory Board when requested.

¹ More information in the document Certification Bodies and Auditors Requirements.

² Requirements for Certification Bodies and Auditors available at <https://recyclclass.eu/wp-content/uploads/2020/07/Requirements-for-Certification-Bodies-and-auditors-30-07-2020.pdf>

2.7 Accredited Laboratories

Independent Accredited Laboratories are recognised to run the RecyClass Recyclability Evaluation Protocols under the supervision of RecyClass.

Accredited Laboratories meet once a year in order to bring potential improvements to the Protocols developed by RecyClass. Accredited Laboratories can be invited in the Technical Committee meetings upon the approval of the chairman. Accredited Laboratories do not pay a membership fee.

Accredited Laboratories group is established to:

- Suggest improvements to the RecyClass Recyclability Protocols.
- Provide their expertise to the Technical Committees in recyclability assessments when requested by the chairman. This can include clarifications about the results, process or challenges found during the tests; as well as their expert opinion.

2.8 RecyClass Team

RecyClass team staff is appointed to manage RecyClass on a daily basis and perform various administration tasks, communication, website, meetings organization and NDA management. Additionally, RecyClass Team also acts as an entry point for RecyClass users and applicants of a recyclability evaluation or product certification.

Communication & website

- Maintain and update the RecyClass website and tool and ensure its proper functioning.
- Upload relevant documentation to the website as it becomes public, e.g. assessment results and updated documents.
- Promote RecyClass via RecyClass social media accounts.
- Write and publish press releases.
- Propose and organize events to promote Design for Recycling and RecyClass.

NDA management

- Arrange and manage the content and signature of the NDA between the applicant and RecyClass required to allow confidential information exchange between the applicant and each TC. The applicant reserves the right to exclude individual TC Representative from the discussion by providing written notice. See more on section 3.3.
- Make sure that all NDAs are set in place.

Documents update

- Provide support to the TC in document management.
 - If the applicant of a recyclability evaluation requires amendments to the third-party agreement document, discuss the changes with a lawyer and have them agreed by the SB.
- Develop and update documents such as Recyclability Evaluation Protocols, Design for Recycling Guidelines, and position papers with the support of the TCs and the SB.

Meetings organization

- Host and organize SB and TC meetings.
- Prepare the Agenda, the presentations, and record minutes of meetings.

Contact Entry Point for Recyclability Evaluation Applicants

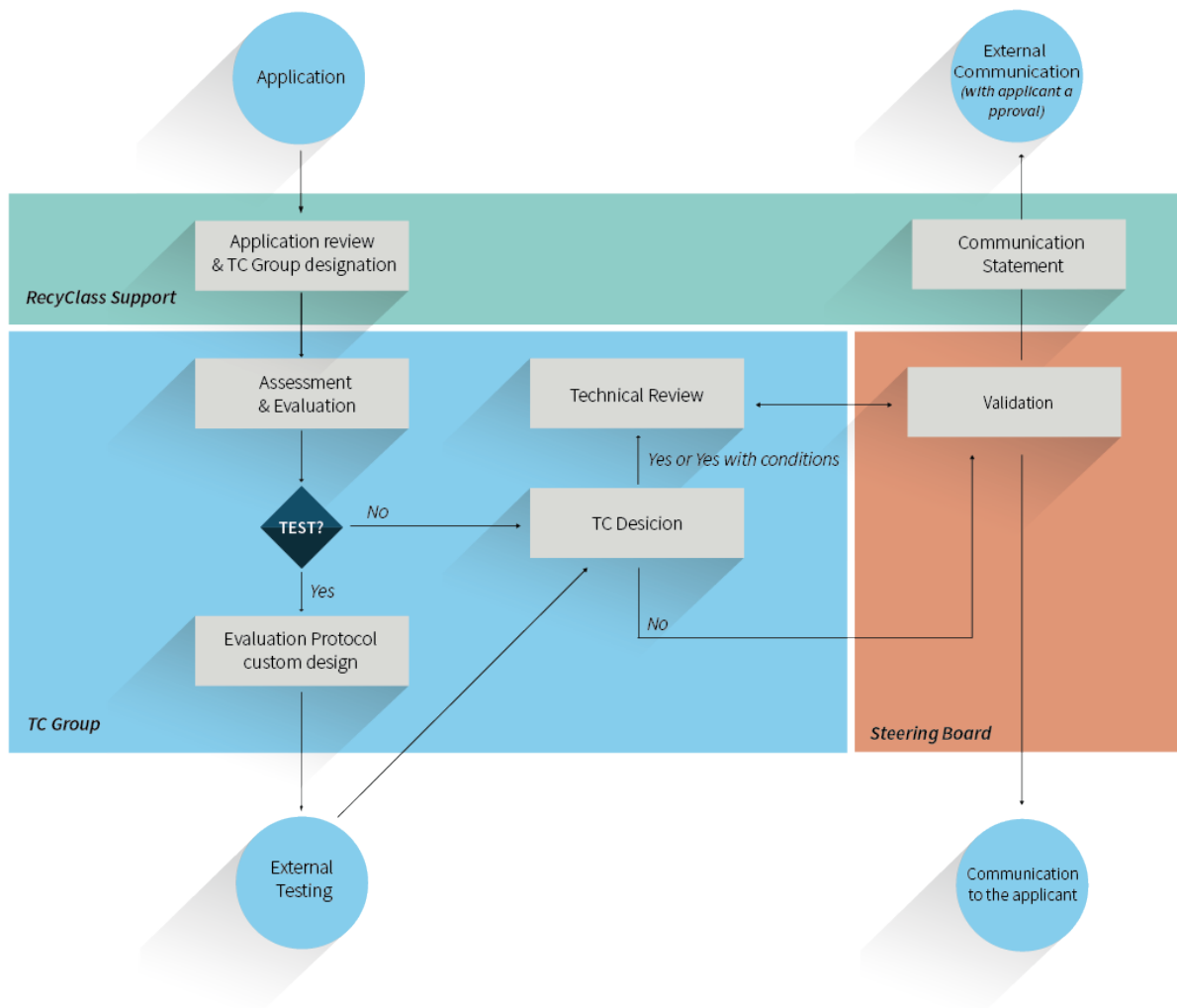
- Ensure effective communication between the applicant, TC and SB.
- Receive evaluation requests from potential applicants, assess whether they fall within the scope of the Plastics Evaluation Protocols and guide the applicant in the application form submission.
- Provide the applicant with the current TC member list. If the applicant requests an individual TC member to be excluded from the discussion, exclude them from access to information related to that discussion and ensure that they are excluded from discussions on the specific application during meetings, e-mail exchange and telephone conferences.
- Provide the third-party agreement document to a recyclability evaluation applicant to be signed by them and the SB chair.
- Manage applications and act as a hub for information transfer between the applicant and the TC, prompting the TC representatives for decisions and assisting to prepare final evaluation statements.
- Ensure feedback to the Applicant and communication to other stakeholders if applicable as described in section 3.9.

3 Assessment Process for Applicants of Recyclability Evaluation

The Recyclability Evaluation Protocols aim to evaluate plastic packaging technologies or innovation materials to test and provide guidance towards its recyclability. The Protocols intend to provide clear and proven guidance on recyclability coming plastic packaging. Additionally, the Protocols aim at facilitating the introduction of innovation or new packages within the recycling market without disrupting the current established recycling streams.

The Recyclability Evaluation Protocols will promote recyclability by encouraging industry to test new plastic technologies, materials or product before market launch and giving advice and recommendations to applicants.

3.1 Overview of the Assessment Process Steps for Recyclability Evaluation Protocols



3.2 Detailed Process Overview for Recyclability Evaluation Protocols

Detailed explanation of the process steps is provided. The following section describes the materials that RecyClass offer to increase the efficiency and transparency of the assessment process.

The applicant must communicate to RecyClass Team if any changes are made to the approved technology or innovation material.

Process-step	Documents	Who
<ul style="list-style-type: none"> Application Submission <p>A request is submitted by a third-party applicant. RecyClass Team determines within which plastic stream corresponds the application and assigns a TC that will assess the application.</p>	Application form	Applicant RecyClass Team

<ul style="list-style-type: none"> • Application Validation <p>RecyClass team verifies that the application falls under the scope of RecyClass and the Evaluation Protocols.</p> <p>RecyClass Team sets NDAs in place between the applicant and RecyClass Team. RecyClass has an NDA in place with the TC representatives.</p> <p>RecyClass Team provides the applicant with the updated list of TC representatives. The applicant can have one or more representatives excluded from the discussion by written request.</p> <p>RecyClass Team circulates all materials provided by the applicant and the TC Chair starts the discussion.</p>	<p>NDA with the applicant List of TC participants</p>	<p>Applicant RecyClass Team TC</p>
<ul style="list-style-type: none"> • Existing information retrieval <p>RecyClass Team asks all available documentation and information that can help speeding up the evaluation process (e.g. lab tests) to the applicant and shares all provided material to the TC.</p>		<p>Applicant RecyClass Team TC</p>
<ul style="list-style-type: none"> • Discussion <p>The TC starts a discussion on how to proceed with the assessment. The Chairman of the corresponding TC may facilitate the discussion by making proposals. Proposals are accepted if no answer is provided within 2 weeks from sending it. TC representatives may ask for additional information. RecyClass Team acts as focal point for communication between the applicant and the TC.</p>	<p>Discussion</p>	<p>Applicant TC Chairman RecyClass Team</p>
<ul style="list-style-type: none"> • Testing proceeding <p>Recyclability Evaluation Protocol have to be carried out by a qualified laboratory approved by RecyClass upon applicant's expense.</p>	<p>Recyclability Evaluation Protocol Laboratory Evaluation Report</p>	<p>External laboratory approved by RecyClass</p>
<ul style="list-style-type: none"> • Assessment <p>The TC discuss the results of the Laboratory Evaluation Report and issue a decision. The TC grants a technology approval as fully compatible or limited compatible. Temporary approvals might be possible for very novel product concepts and under specific conditions. The SB issues the final decision on recommendation of the TC.</p>	<p>Approval Letter</p>	<p>TC SB</p>

<ul style="list-style-type: none"> • External communication <p>Communication of the final result either passively (e.g. adapted Guidelines for Recycling) or actively (e.g. press release). Active communication shall count with SB and the applicant approval.</p> <p>Publication of opinion statements (only positive results will be published) on RecyClass website upon applicant’s revision and approval of the content.</p>	<p>RecyClass Design for Recycling Guidelines</p> <p>Case Study</p> <p>Press release</p>	<p>Applicant</p> <p>SB</p> <p>RecyClass Team</p>
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3.3 Available Documentation for the Applicant

Application Form

The applicant submits the completed Application Form detailing the innovation material or packaging to be approved. RecyClass Team acts as an entry point for all requests.

Internal Non-Disclosure Agreement (Internal NDA)

An Internal NDA is set in place between the SB, TC participants (including AB representatives) and Plastics Recyclers Europe to maintain confidentiality within RecyClass.

NDA with the Applicant

Secrecy agreement to be signed by Plastics Recyclers Europe and the applicant declaring that PRE will take all reasonable steps to maintain the confidentiality of the sensible information of the application submitted.

SB Representatives will not have access to confidential information provided to the TC in order to assess the applicant and/or design an appropriate Recyclability Evaluation Protocol.

Register of SB members

List of representatives in the SB. The list is available online at the RecyClass website. The list contains the names of the people that participate in the validation process of the Assessment Process. RecyClass Team must be informed if SB members have a conflict of interest which would de facto prevent them to respect the internal NDA.

List of TC representatives

List of representatives involved in the Assessment Process who have access to confidential information provided by the applicant for the purpose of evaluating the impact of their technology. The applicant has the right to ask for exclusion of one or more technical representatives from the discussion based on a justified reason. This request must be made in writing. The list is updated by RecyClass Team whenever changes take place. Applicants having an open application are informed of the change.

RecyClass Team must be informed if TC representatives have a conflict of interest which would de facto prevent them to respect the internal NDA.

3.4 Laboratory Testing

Each application is first assessed by the TC to determine the necessary amount of testing needed. Recyclability Evaluation Protocols are based on the standard test procedures depending on the specific packaging design. RecyClass is aware of the high costs that may be associated with laboratory testing and will optimise the testing during the assessment in order to issue a recommendation decision to the SB.

The Recyclability Evaluation Protocols are available for download in the RecyClass website. Companies providing plastic packaging concepts are encouraged to use them to self-assess the impact of their solutions on recyclability and highlight potential issues. However, compliance to a Recyclability Evaluation Protocol is not a replacement for an official assessment and may not be used as a marketing tool.

All tests must follow the Evaluation Protocols recommended by RecyClass TC and must be conducted by an independent laboratory approved by RecyClass which has no legal affiliation to the applicant.

Nonetheless, in-house testing at the applicant's facility might be allowed under the following exceptional conditions:

- The applicant concerned demonstrates that they were unable to comply with the original test procedures and/or that the technical conditions do not allow any other option.
- The applicant owns an in-house test laboratory with standard test equipment and for in-house laboratory procedures, equipment must be operated and evaluated according to similar test conditions as an independent test laboratory.
- RecyClass gives special permission for in-house testing.
- RecyClass appoints an auditor who will monitor the execution of the tests at the applicant who will certify the test results. The applicant may be requested to cover the travel and accommodation costs of the auditor.

3.5 Costs

RecyClass assessment process is covered under a RecyClass fee of 2.500€. However, RecyClass is not responsible for any costs related to the performance of the testing in an accredited laboratory based on the Recyclability Evaluation Protocols.

3.6 Laboratory Evaluation Report

The applicant commits to disclose all test results with RecyClass within the Laboratory Evaluation Report that will be provided by the correspondent laboratory. The Laboratory Evaluation Report will be made available to RecyClass Team and TC who will assess the compatibility of the technology within collection and sorting schemes and determine its suitability with a determined recycling stream in Europe.

The Laboratory Evaluation Report will be shared with RecyClass under the conditions established in the NDA with the applicant.

The Laboratory Evaluation Report shall include:

- Executive Summary
- Company name & contact person
- Product name and description
- Market sector & market volume
- Test design
- Research facility & contact person
- Detailed description of input material & sample preparation
- Material & equipment used
- Process conditions
- Test results & remarks (including repeatability)
- Further comments
- Summary

3.7 TC Evaluation and Final Assessment

The TC reviews all Laboratory Evaluation Reports and any other relevant information provided by the applicant. The TC provides guidance for the interpretation of the results of the performed tests. If the results are inconclusive, the TC may request to perform further testing in order to give a Approval Letter.

All documentation provided by the applicant will be discussed between TC Representatives who have access to confidential information related to the specific application as set in the NDA signed with the applicant.

The TC issues a Approval Letter containing a technical review and summary of the evaluation results, conclusions, and recommendations to be submitted to the SB. In case of a positive recommendation, the Approval Letter also includes a proposal for external communication: press release and modification of the Design for Recycling Guidelines if applicable.

3.8 Approval Letter

The Approval Letter is drafted by the TC and RecyClass Team with the SB validation. The document includes an overview of the technical review provided by the Laboratory Evaluation Report and the TC assessment and conclusions regarding the recyclability of the concept packaging or innovation material. In addition, it includes recommendations and next steps.

RecyClass provides the applicant with a Approval Letter, containing the following information:

- Overview of assessment process
- Impact on existing collection & sorting schemes
- Impact on the concept packaging or innovation material on recycling process
- Decision of RecyClass
- Recommended Communication through RecyClass
- Next steps (if required)

The Approval Letter determines the recyclability of the tested packaging or packaging technology within which category the concept packaging or innovation material falls under according to the Design for Recycling Guidelines³.

- **Fully compatible** – Compatible with existing industrial recycling processes. Design solutions readily accepted by sorting centres and recyclers since the majority of the industry has the capability to identify, sort, and process a product exhibiting this feature with minimal negative effect on the operation or final product quality. Products with these features are likely to pass through the recycling process into the most appropriate material stream with the potential of producing high quality material.
- **Limited compatible** – Detrimental but still compatible with existing industrial recycling processes. Design solutions that present known technical challenges for sorting centre or recycling operations, yield or final product quality, but are reluctantly tolerated and accepted by the majority of sorting centre and recyclers.
- **Non-compatible** – Not compatible with existing industrial recycling processes. Design solutions with a significant adverse technical impact on the sorting centre or recycler's operations, yield, or final product quality. The majority of sorting centre or recyclers cannot remove these features to the degree required to generate a marketable end-product.

³ RecyClass [Design for Recycling Guidelines](#)

The applicant may review the content of the Approval Letter before final approval by the SB. Any proposed amendments must be in line with the TC conclusions and recommendations and must be approved by the TC.

RecyClass Team sends the Approval Letter to the applicant. RecyClass offers the applicant the opportunity to discuss the report and provide suitable solutions to increase the recyclability of the innovation material or concept packaging if applicable. RecyClass has access to state-of-the-art knowledge, information, and expertise of the plastics recyclers in Europe.

RecyClass reserves the right to change the result of the Approval Letter at any time prior notification to the applicant by using updated technology, assessments, or experience.

SB Validation

The SB reviews the recommendations and the communication proposals of the TC and validates the Final Assessment. The SB communicate its decision to the TC.

In the event of disagreement between the SB and TC for a final recommendation, the Final Assessment will be returned to the TC including remarks from the SB. After that, the TC will meet again and may invite the applicant and/or laboratory performing the test to participate and provide additional information regarding the packaging product or innovation material tested. The Final Assessment with clarifications is sent to SB again for validation.

RecyClass Team ensures communication of the Final Assessment to the applicant.

3.9 External Communication

If the Approval Letter results are positive, RecyClass Team will publish the Approval Letter on the RecyClass website in order to report publicly the new findings and the laboratory testing. Additional communications, such as press release, are recommended as well. Any form of communication shall be approved by the SB and the applicant. Communications can be made available via the RecyClass website and social media accounts. Use of the positive opinion by the applicant for marketing and communication purposes is subject to conditions and restrictions.

RecyClass Design for Recycling Guidelines

RecyClass Design for Recycling Guidelines provide guidance to plastics industry players concerned with an efficient end-of-life recyclability during the first stages of product design. The Guidelines propose the most effective design solutions to facilitate a packaging recycling.

Information gathered in the Final Assessment will be used to verify or modify the information contained in the RecyClass Design for Recycling Guidelines.

Case Study

A Case Study is an easy-to-read and brief presentation of key points, emphasizing the impact on the existing collection & sorting schemes on a specific recycling stream.

Case Studies are based on the results of one or more assessments and are available to the public. Topics are addressed in a general matter, without disclosing any company names, commercial names, or other confidential information. With the approval of the applicant.

Press release

RecyClass may publish a press release to communicate on positive results of the Approval Letter. The press release must be approved by the SB and the applicant.

Communication by the Applicant referring to RecyClass's test results

The applicant must refer accurately to all conditions and results described in the Approval Letter.