

RecyClass

RECYCLASS INTERNAL PROCEDURES

GOVERNANCE &
TASKS DISTRIBUTION

FOR RECYCLASS STAKEHOLDERS

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RecyClass

1. INTRODUCTION

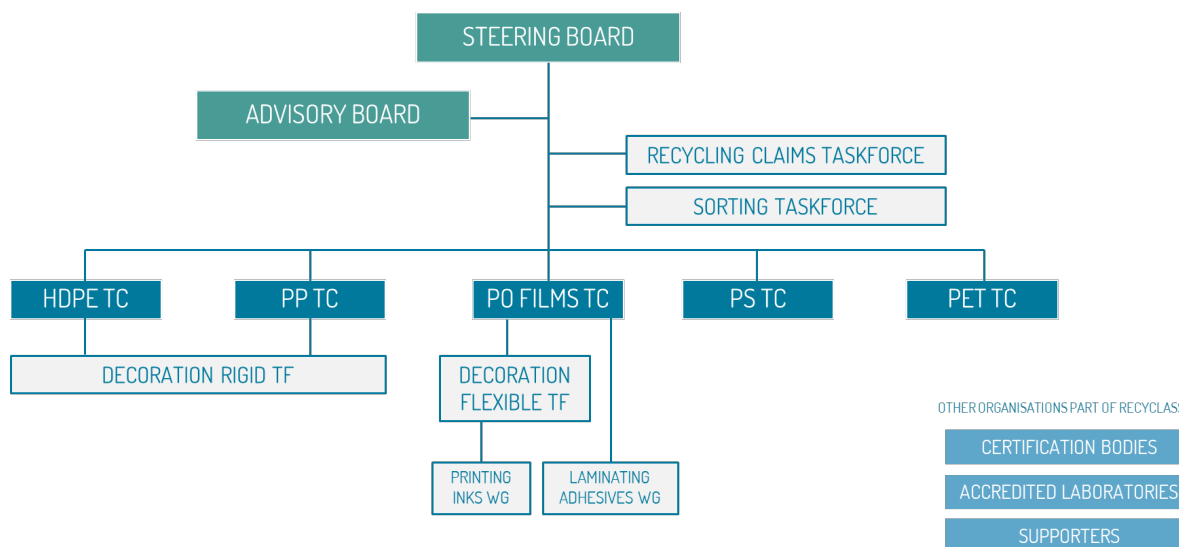
RecyClass is a comprehensive and technical cross-industry initiative that works to advance plastic packaging recyclability and to establish a harmonized approach towards recycled content calculation and traceability in Europe. Activities within RecyClass include the development of Recyclability Evaluation Protocols and scientific testing of innovative materials which serve as the base for updating the Design for Recycling guidelines and the free online tool. Furthermore, RecyClass developed and maintains certification schemes for plastic packaging recyclability and for recycled content traceability in plastic products. 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 companies to improve the recyclability of their plastic packaging and to integrate recycled plastics in their plastic products.

RecyClass structure and functions can be found described below.

2. ROLES & TASKS DISTRIBUTION

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

Figure 1: RecyClass Structure and working groups organisation



2.1 STEERING BOARD (SB)

The RecyClass SB is composed by a minimum of 6 members including the chairman of RecyClass and the chairmen of each Technical Committees.. Additionally, the AB appoints 5 representatives, including the AB chairman and the chairmen of Sorting and Claims Task Forces, 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 at least by 9 of these members, representing in any case at least the 75%.

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All SB participants represent RecyClass and report only to them within the boundaries of the Internal Confidentiality Agreement. 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
- Approve Supporters, Certification Bodies, Laboratories
- 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.
- Propose to the SB the establishment of specific task forces on topic of interest.
- Review and discuss the annual report of activities from RecyClass.

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2.3 TECHNICAL COMMITTEES (TCs)

RecyClass is constituted by five different TCs per polymer type: PO films, HDPE, PP, PET and PS. Each TC is composed by 5 representatives:

- The chair or vice-chair of the corresponding PRE WG who will chair the committees,
- 2 additional representatives of recyclers appointed by PRE
- 2 elected 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 and supporters, 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 5 representatives. 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 representative 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 and RecyClass Online Tool 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 the RecyClass Technology/Product Approval Quality Management & Procedures document 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 (TFs)

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 by the SB to follow up any possible changes. The SB can dismiss a Task Force at any time.

The TF will appoint a Chairman which is part of the AB and elected by a period of 2 years. In case of vacancy, a new Chairman will be appointed. The Chair of the TF steers the work in the TF and serves as a communication point between the TF, the AB, and the SB. The Chairman of the TF has a seat in the RecyClass SB.

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A taskforce is established to:

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

2.5 WORKING GROUPS (WGs)

A working group (WG) is a group of RecyClass experts established by a TC based on the need for a specific work on a specific topic. Working groups are established with a specific purpose (test campaign, alignment project, ...) and are dissolved once completed the work. Therefore, a working group is established for a temporary period of time with volunteered members and is directly related to a specific TC or TF.

A working group is established to:

- Following the proposal of a TC, address a specific topic on a short time.
- Propose solutions and share them with the related TC or TF.

2.6 ACCREDITED LABORATORIES

Independent Accredited Laboratories are recognised to run the RecyClass Recyclability Evaluation Protocols under the supervision of RecyClass. Requirements, qualifications, and conditions for accredited laboratories to conduct the Evaluation Protocols developed by RecyClass Technical Committees and Task Forces are defined in the RecyClass Accredited Labs Procedures and Quality Management¹ document.

Accredited Laboratories meet every quarter to bring potential improvements to the Protocols and Quick Test Procedures 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 and Quick Test Procedures.
- 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.

2.7 CERTIFICATION BODIES (CBs)

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 Course².

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*³.

¹ *RecyClass Accredited Labs Procedures and Quality Management*

² *More information in the document 'Certification Bodies and Auditors Requirements'.*

³ *Requirements for Certification Bodies and Auditors*

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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.

2.8 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 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.

2.9 RECYCLASS TEAM

RecyClass Tam 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 an assessment process.

2.9.1 COMMUNICATION & WEBSITE

- Maintain and update the RecyClass website and tool and ensure their 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.

2.9.2 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 the document RecyClass Technology/Product Approval – Quality Management and Procedures.
- Make sure that all NDAs are set in place.

2.9.3 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.

2.9.4 MEETINGS ORGANIZATION

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

2.9.5 CONTACT ENTRY POINT FOR ASSEMENT PROCESSES

- 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, the Recyclability or Recycled Content Traceability Certifications, or the Letter of Compatibility and guide the Applicant in the application form submission.
- In the case of Testing Evaluation Protocols:
 - 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 the RecyClass Technology/Product Approval Quality Management & Procedures.
- In the case of Certifications or Letters of Compatibility, support the Applicant and the CB as reported in the Certification Quality Management & Procedures document of the corresponding audit.

3. ONLINE TOOL UPDATE

The RecyClass Online Tool is a freeware that enables stakeholders to self-assess the recyclability of plastic packaging on the basis of the Design-for-Recycling Guidelines. The RecyClass Online Tool promotes recyclability and circularity by encouraging industry to quickly self-evaluate the compatibility of the different features constituting a plastic packaging while giving recommendations on how to improve packaging design to make it compatible with current recycling technologies. RecyClass Online Tool is developed as an educative and pedagogic tool and can only provide guidance to the user. In any case, RecyClass Online Tool should be used to claim any packaging recyclability. Additionally, the RecyClass Online Tool permits to obtain a self-assessment report that can be used to start a Recyclability Certification process, following the recyclability methodology developed by RecyClass.

The RecyClass Team is responsible for updating the RecyClass Online Tool, based on the compatibility evaluations, the updates of the Design for Recycling Guidelines and the development of recycling, sorting and plastic collection in Europe that are under constant evolution. Depending on the nature of the update, a specific approval process must be followed by the RecyClass team.

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Table 1: Management of the Online-tool updates

RecyClass Online Tool version update	Nature of the update	Approval Process
Version X	Structural modification(s) impacting the decision trees and the logic of the Tool	Approval required by the SB
Version X.Y	Answers and/or scoring modification(s) following the Design for Recycling Guidelines and possibly impacting the recyclability results	Approval required by the corresponding TC and by the SB
Version X.Y.Z	Editorial modification(s) not impacting the recyclability evaluation (e.g., modification of help boxes, mapping information, etc.)	No approval required. Managed by the RecyClass Team to facilitate the user experience

Any update of the Tool must generate a new version, that is reported on the web page and the PDF report generated after a packaging analysis. Additionally, a page dedicated to the versioning should explain the update corresponding to the new version.

4. ASSESSMENT PROCESSES

4.1 RECYCLABILITY

4.1.1 TECHNOLOGY/PRODUCT APPROVALS

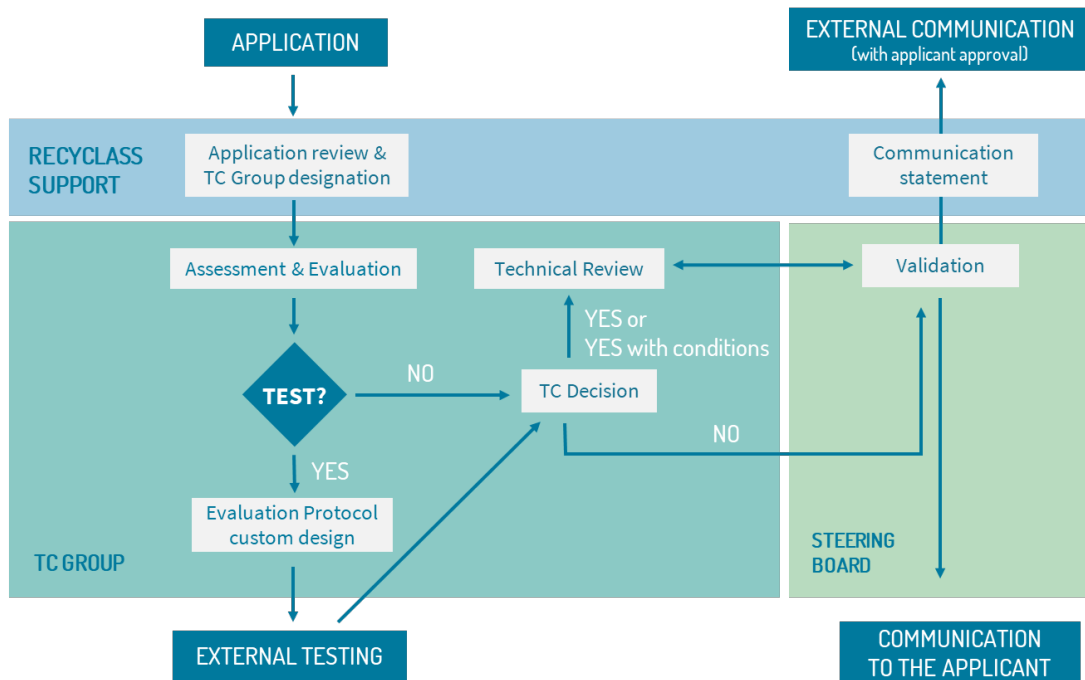
The Recyclability Evaluation Protocols aim to evaluate plastic packaging technologies or innovation materials to test and provide guidance towards its recyclability. The Protocols intend to provide clear and proven guidance on recyclability coming plastic packaging. Additionally, the Protocols aim at 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. The general approval scheme is presented, here below in Figure 2, while a more detailed explanation of the process steps is provided in the RecyClass Technology & Product Approval Quality Management & Procedures document⁴.

⁴ RecyClass Technology & Product Approval Quality Management & Procedures

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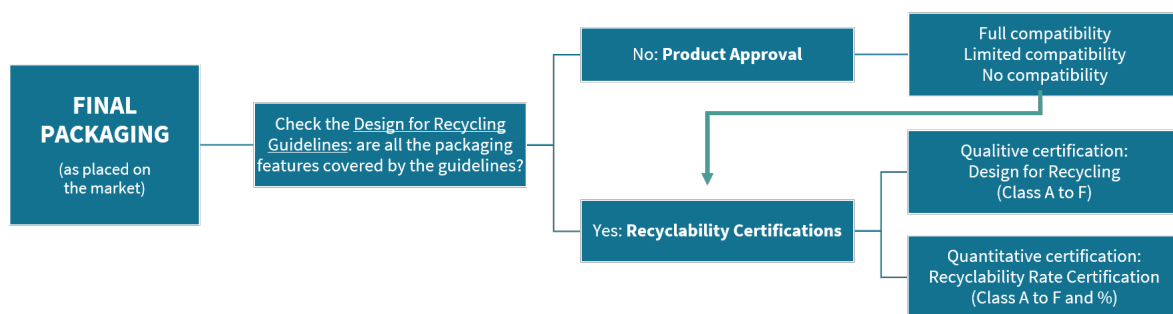
Figure 2: Overview of the Assessment Process Steps for Recyclability Evaluation Protocols



4.1.2 RECYCLABILITY CERTIFICATIONS

Final packaging, that are entirely covered by the Design for Recycling Guidelines, can be certified by a CB recognized by RecyClass to audit packaging following the Recyclability Certification Schemes. Two schemes were developed, as reported in the figure below.

Figure 3: Overview of RecyClass Approvals and Certifications for final packaging



RecyClass Recyclability Certifications offer reliable assessments of the recyclability of a packaging design on the RecyClass Design for Recycling Guidelines⁵ and the RecyClass Recyclability Methodology⁶. The procedures of the scheme are detailed in the RecyClass Recyclability Certification Quality Management & Procedures document⁷.

⁵ <https://recyclass.eu/recyclass/design-for-recycling-guidelines/>

⁶ <https://recyclass.eu/recyclass/methodology/>

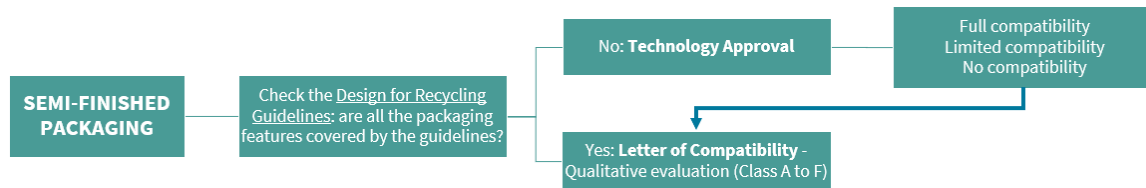
⁷ RecyClass Recyclability Certification Quality Management & Procedures

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4.1.3 LETTER OF COMPATIBILITY

Semi-finished packaging can also be evaluated according to the RecyClass Recyclability Methodology⁸ and the RecyClass Design for Recycling Guidelines⁹ by the CBs, who issue in this case a Letter of Compatibility. RecyClass Letter of Compatibility offers reliable evaluation of the recyclability of a semi-finished packaging design. However, the letter is not a certificate and is destined to Business-to-Business communications only.

Figure 4: Overview of RecyClass Approvals and Evaluation for semi-finished packaging



4.2 RECYCLED PLASTICS

4.2.1 RECYCLED PLASTICS TRACEABILITY CERTIFICATION

The RecyClass Recycled Content Traceability Certification aims to harmonize the approach towards assessment of the recycled content of products for companies making environmental claims. The Recycled Content Certification aims at recognising the use of recycled plastics in compounds, products or semi-finished products and is destined to companies using recycled material who want to guarantee the origins and traceability of their material along the whole value chain. The Certification focuses on the traceability of the material in the different process steps that must be verified throughout the whole chain of custody of the material.

The Certification is granted based on the Audit Scheme requirements, and it is governed via Certification's Quality Management Systems and Processes. The Audit Scheme can assess the traceability of recycled plastic material throughout all the steps of the value chain, while verifying the origin of the pre- and post-consumer material in product claims. The Scheme is based on the international standard on the chain of custody (ISO 22095), as well as the European standard on recycled plastics traceability (EN 15343:2007).

The Recycled Content audit scheme and its process are detailed in the RecyClass Recycled Content Traceability Certification Audit Scheme¹⁰ and Quality Management & Procedures¹¹ documents.

⁸ <https://recyclclass.eu/recyclclass/methodology/>

⁹ <https://recyclclass.eu/recyclclass/design-for-recycling-guidelines/>

¹⁰ *RecyClass Recycled Content Traceability Certification Audit Scheme*

¹¹ *and RecyClass Recycled Content Traceability Certification Quality Management & Procedures*

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