

RecyClass

QUALITY MANAGEMENT & PROCEDURES

RECYCLED PLASTICS
TRACEABILITY CERTIFICATION

RECYCLED PLASTICS

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1. INTRODUCTION

This document lays out quality management systems of the RecyClass Recycled Plastics Traceability Certification and lays out the procedure to apply for and obtain Certification.

The Certification offers a reliable third-party audit of recycled plastics traceability across the whole value chain; thus, validating the share of recycled content in products and the origin, source, and type of the waste.

2. CERTIFICATION DEVELOPMENT AND MAINTENANCE

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

RecyClass regularly review all available documentation including the Audit Scheme, Guidance and Audit Checklist, 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 plastics along the value chain. Changes and updates are implemented by the RecyClass Steering Board which is composed by representatives of RecyClass as laid out in the document “RecyClass Internal Procedures”.

A non-exhaustive list of cases where changes to Certification documentation might be needed might be found below:

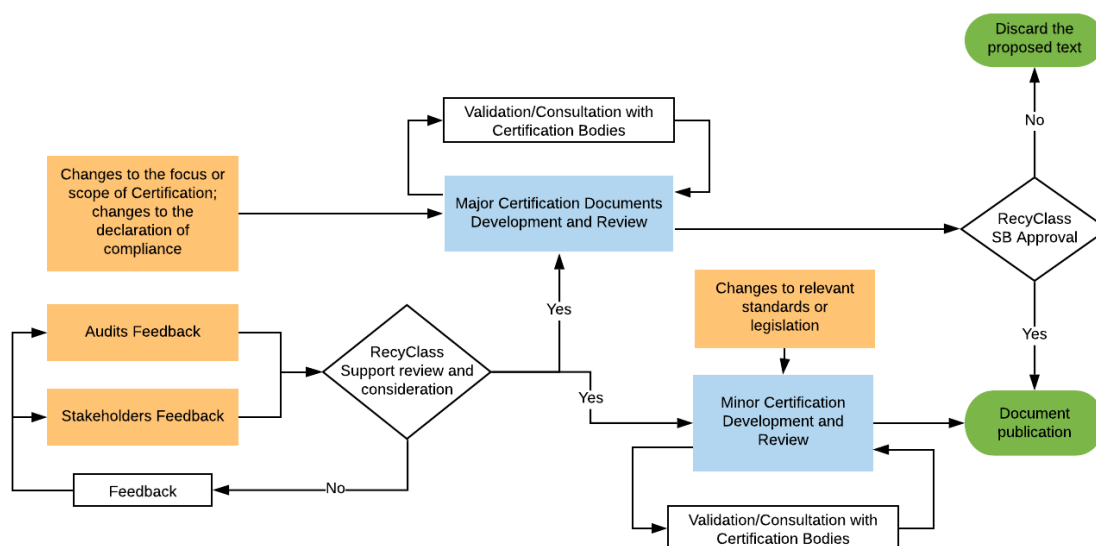
- Changes to relevant European standards (e.g., EN 15343) or relevant legislation (e.g., requirements on the calculation of recycled content) under the focus and scope of the Certification. Updates will need to be reflected into the Certification documentation.
- Changes in the focus or/and scope of the RecyClass Recycled Plastics Traceability Certification by the RecyClass Steering Board.
- Repeated feedback from auditors following their experience during the audit process, check of conformity with audit requirements and completion of the Audit Report. Frequent valuable comments will be taken into the Steering Board for consideration to improve the Certification documentation.
- Stakeholders’ feedback and proposals from RecyClass members and supporters. If valuable and relevant to the Certification focus and scope, will be submitted to the Steering Board for consideration.

RecyClass considers and records all proposals to Certification and assesses its suitability within the Certification scope. Feedback is provided when appropriate within a period of 3 months.

Suitable feedback is included in the respective documentation during the review. Reviewed documents are consulted with Certification Bodies to ensure the suitability and fitness of the added requirements or procedures. The RecyClass SB approves the final version of the documents for publication.

Figure 1 summarises the different steps for the revision and development of requirements and procedures within the Certification.

Figure 1. RecyClass process for revision and development of Certification documentation



Documentation development and review is structured as follows:

- Major Certification Documentation Development and Review**
 General review of requirements, procedures and guidelines following changes to focus or scope of Certification or changes to the declaration of compliance, as well as feedback and/or proposals for development. This includes major suggestions to the Audit Scheme requirements and the certification procedure under or outside the focus and scope of the Certification. These changes will have a major impact to the results of the Audit and will be recorded as a new version of the documents indicated as version X.
- Minor Certification Documentation Development and Review**
 Editorial changes, additional descriptions, or clarifications that will facilitate the understanding and usability of all available Certification documentation. Minor review of requirements, procedures and guidelines within the focus or scope of Certification. Changes in relevant regulation or legislation in the scope of Certification. These changes will have a minor impact to the results of the audit and they will be recorded as a new sub version of the documentation indicated as version X.X.

2.1 SYSTEMATIC REVIEW

A review and development of Certification documentation can be launched at any time by RecyClass. In addition, RecyClass will propose a systematic review of all available documentation every 3 years.

RecyClass will keep Certification Bodies informed of the release of a new document version for implementation. Changes or additions to all documentation will be detailed in the Version control table at the end of each document.

2.2 COMMUNICATION OF CHANGES

RecyClass will communicate via email the release of any document new version (X) to Certification Bodies, Certification holders, applicants and RecyClass members and supporters. Major changes made within the relevant documents will be described.

RecyClass will communicate via email the release of any document new version (X.X) to Certification Bodies.

RecyClass can offer support to Certification Bodies to adapt the audit evaluation according to the newly set requirements or procedures. Support can be given in form of a training for auditors or exchange of information during a call or via email.

Changes will also be communicated to National Accreditation Body via email informing of the changes.

3. USE OF OFFICIAL DOCUMENTATION

RecyClass Recycled Plastics Traceability Certification documentation are published in English on the RecyClass website. Certification Bodies must use official RecyClass document templates to procure the Audit Report, Certificate and additional documentation to the applicant in English.

The new version of the Audit Scheme or any other Certification documentation must be used for any new Certification requests accepted by a Certification Body. Certification requests are considered new upon the signature of the Certification Agreement.

Applicants who signed the Certification Agreement prior to the publication of a document new version, may use the previous versions with which they started the evaluation process. Certification Bodies should offer the opportunity to continue the audit with the newest versions.

RecyClass may determine specific conditions with the publication of a transition period.

4. CERTIFICATION BODIES

RecyClass Certifications are issued by recognised Certification Bodies duly represented by a recognised auditor who operates according to the procedures described in this document, the requirements included in the document “Certification Bodies and Auditors Requirements” and the terms of the Cooperation Agreement.

Certification Bodies ensure that the Applicant complies with the terms described in the Certification Agreement.

Communication between Certification Bodies and RecyClass must be kept at a regular basis. Certification Bodies must communicate to RecyClass any new applications for Certification. RecyClass will provide a unique certification code

for registration. Certification Bodies must communicate to RecyClass the organisation of the on-site audits and Certification decision of initial audits, provisional audits and monitoring audits.

RecyClass can organise workshops to align views among the auditors and communicate new developments on the Scheme.

5. ACCREDITATION BODIES

National Accreditation Bodies conducts the accreditation procedure according to ISO 17011. Auditors taking part in the evaluation of Certification Bodies should have knowledge about the plastics industry and a good understanding on the traceability of materials.

During the assessment of the certification procedure, National Accreditation Bodies may rely on the documents requested during the documentation evaluation as described in section 10.

6. 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. The NDA must also cover the information shared in the application form.

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

7. CERTIFICATES QUALITY CONTROL

A control system guarantees the quality and rigour of all audit reports via an internal sample check procedure which ensures coherence and consistency among all issued certificates.

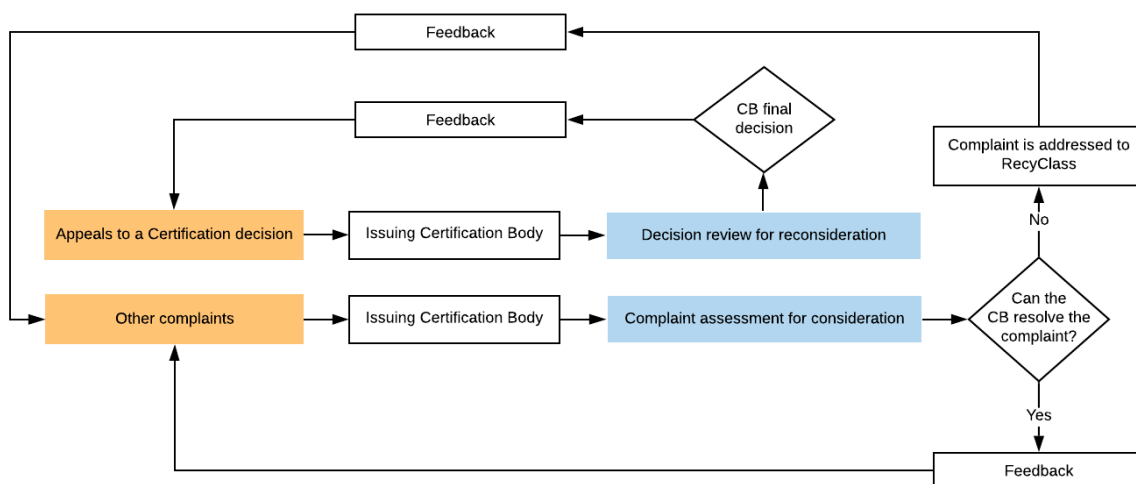
A RecyClass expert will select several audit reports annually for a sample check. The review of the Audit Reports is made anonymously using a third-party code to preserve the confidentiality of the applicant.

Any non-conformities within the audit reports or non-compliant behaviour or breach of the cooperation agreement with Certification Bodies may be reported to the Steering Board according to the procedures described in the document “Auditors and Certification Bodies Requirements”.

8. COMPLAINTS AND APPEALS

Complaints and appeals are handled according to the procedure described in Figure 2.

Figure 2. Complaints and appeals procedure



Applicants can address appeals against a Certification decision to the issuing Certification Body. Certification Bodies must consider all appeals for reconsideration of a decision that has been made regarding to the Certification. Other complaints about a Certification Body must also be submitted to the issuing Certification Body. The Certification Body must consider and address all inquiries and maintain records of them. Certification Bodies may request RecyClass to assist on the interpretation of the requirements and procedures of the Certification Audit Scheme. Certification Bodies must keep their own appeals and complaints procedure in accordance with the provisions of ISO /IEC 17065.

8.1 COMPLAINTS AND APPEALS TO RECYCLASS

When a complaint or appeal is not, or cannot be, resolved by the Certification Body, the issuer or the Certification Body can address them to RecyClass directly. Applicants can also direct complaints directly to RecyClass in case of lack of response from the Certification Body. The appeal procedure does not suspend the original decision of the Certification Body. Complaints and appeals must be submitted to RecyClass via official letter within one month of the formal notification of the Certification decision.

9. ELEGIBILITY TO APPLY FOR A CERTIFICATION

Any product, component or family of products containing recycled plastics may apply for Certification. Namely, compounds, 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. Process within a defined site shall be able to maintain traceability of recycled plastics.

10. CERTIFICATION PROCEDURE

The Applicant may contact a recognised Certification Body to start the Certification procedure. As a first step, Certification Bodies will provide the necessary information to applicants for their understanding of the focus of the Audit Scheme, object of Certification and procedures. Certification Bodies will assess the eligibility of the applicant.

Following the introduction, applicants must submit their applications for Certification using the Application Form. Certification Bodies might ask for clarification or additional information that will allow them to propose a plan for the audit and send a budget proposal. The audit evaluation plan must include provisional dates for delivering of the first Draft Report, finalised Audit Report with its associated Certificate and the Certification Agreement.

The Certification Body and Applicant will start the auditing procedure with the signature of the Certification Agreement and 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.

The Certification Body will provide a list of requested documentation to the applicant necessary to conduct the documentation review. These may 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
- Supplier's Certification;
- Technical Data Sheet of products under the scope of Certification and the production records for the past 12 months;
- Production logs for process and associated management reports;
- A report detailing all inputs into the 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

Certification Body will conduct the documentation review to evaluate the information and documentation provided and determine to which extent the applicant fulfils the audit requirements and fitness for the on-site audit. The Certification Body may ask for additional documentation or information to better understand the process and organization.

Once the documentation review is completed, the Certification Body will perform an on-site audit to inspect the process and products on location. Certification Body will perform a traceability check of recycled plastics and a

reconciliation of volumes to verify that output corresponds to the recycled input used, considering losses or additives added. The Certification Body will also verify the veracity and accuracy of the provided documentation.

After the on-site audit, the Certification Body will prepare the Audit Report and Certificate. Any non-conformities identified and recommendations for improvement will be shared with the Applicant. Certification Bodies may determine a specific period of time for corrective actions to be implemented.

10.1 AUDIT OUTCOME

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

- Draft Report (electronic copy): Issued no later than 4 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 within 6 weeks after the audit date.
- Certificate: The Certification Body will provide the final certificate signed by the recognised 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 10.2.

10.2 DETAILED PROCEDURE

Process	Documentation	Participants
<p><u>Introduction to the Certification</u></p> <p>Certification Body provides the applicant with necessary information to understand the procedures, purpose of the audit and Audit Scheme requirements. Certification Body organises a meeting with the applicant to ensure the right understanding and create mutual trust between parties.</p>	Procedures and Quality Management Systems, Audit Scheme	Certification Body, Applicant
<p><u>Application submission</u></p> <p>The applicant submits a Certification request to a recognised Certification Body of their choice via the Application Form. The Certification Body might request additional information for clarification.</p>	Application Form	Applicant, Certification Body
<p><u>Application assessment</u></p>	Audit Plan, Budget Proposal	Applicant, Certification Body

<p>The Certification Body proposes a planning, timescales and a quote to the Applicant for the audit.</p> <p>The Certification Body determines to which extend the applicant fulfils the Certification requirements.</p>		
<p><u>Signature of the Certification Agreement</u></p> <p>Certification Body signs a Certification Agreement with the Applicant.</p> <p>The Applicant and the Certification Body will also sign an NDA to safeguard the confidentiality of their process.</p>	<p>Certification Agreement, NDA</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, date of the scheduled audit and request of a Certification code. RecyClass will subsequently assign a code (RC00XX-COM-MM-YY-CBS-AN) which must be included on the Audit Report and its associated Certificate.</p> <p>The Certification will be created according to the following guidance:</p> <p>RC00XX – unique code per Certification</p> <p>COM – 3 letters identifying the company name</p> <p>MM-YY – month and year of Certification expiration</p> <p>CBS – 3 letters identifying the Certification Body</p> <p>AN – 2 letters identifying the auditor</p> <p>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>Documentation Review</u></p> <p>The Applicant designates a person as the main contact with the Certification body and a person or group of persons with management responsibilities for the exchange of documentation and additional information related to the products, production process and management system related to the Certification prior to the on-site audit.</p> <p>The Certification Body evaluates the information and documentation provided, requests additional clarifications if</p>	<p>Applicant’s documentation</p>	<p>Applicant, Certification Body</p>

<p>needed, and assesses to which extend the applicant fulfils the Certification requirements.</p>		
<p><u>On-site Audit</u></p> <p>A recognised auditor from the Certification Body conducts the on-site audit upon agreeing a date with the Applicant.</p> <p>The auditor will:</p> <ul style="list-style-type: none"> - Inspect the organisation’s site, process and products; - Determine that all information provided is correct and complete; - Assess the production process and management systems critical to the product conformity/ related to the audit requirements to verify the traceability and systems implemented in the site according to the Audit Scheme. - Determine compliance with the requirements detailed in the Audit Scheme. <p>The onsite audit will take place during 1 day. The time of the audit might vary depending on the number of products audited, size of the site or complexity of the process.</p>	<p>Audit Scheme</p>	<p>Applicant, Certification Body (auditor)</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 final questions.</p> <p>Certification Bodies will communicate any non-conformities to the applicant and will request the implementation of corrective actions if needed or describe recommendations for improvement.</p>	<p>Audit Report</p>	<p>Certification Body (auditor)</p>
<p><u>Review and Certification decision</u></p> <p>A recognised auditor from the Certification Body who was not part of the onsite audit, will review the Audit Report (and additional documentation if needed) to ensure it provides an adequate and effective demonstration of the fulfilment of the requirements specified in the Audit Scheme.</p>	<p>Audit Report; Certificate</p>	<p>Certification Body (reviewer)</p>

<p>If the outcome of the review is positive, the recognised auditor makes the decision to issue the Certification. When the review is negative, Certification will not be granted.</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 of conformity release</u></p> <p>Following a positive outcome, the Certification Body issues the final Certificate.</p> <p>The Certificate must state the list of certified products and the address of the process or operation audited connected to the object of certification.</p> <p>The Certificate must state the issuing Certification Body and must be signed by the auditor in charge of the audit.</p> <p>The applicant will also be listed in the RecyClass website list of certified companies.</p> <p>The certification holder can use the Certification logo on the certified products after signing a licensing agreement.</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 and Summary Sheet 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>The Certificate and Audit Report will be released within 6 weeks of the date of the onsite audit.</p>	<p>Audit Report; Certificate; Use of Claim Guidance</p>	<p>Certification Body; RecyClass</p>
<p><u>Monitoring Audit</u></p> <p>A monitoring audit will take place once a year.</p> <p>The date of the onsite audit will be agreed between the Certification holder and the Certification Body six weeks</p>		

<p>prior to the expiration date. If the outcome of the audit is positive, the date of validity will be carried down one additional year.</p> <p>In a monitoring audit the Certification code will be changed adapting the year of the validity.</p>		
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11. VALIDITY OF CERTIFICATION

The period of validity of the Certification and the right to use RecyClass logo and claims is limited to 1 year from the date of issue, given that no significant changes to the certified process or products are made.

The validity of the Certification is subject to the conditions below and the Certification Agreement:

- Certification is valid for the process and products evaluated and listed in the Certificate.
- Certification holders must fulfil all Certification requirements as described during the audit preparation. Any significant changes to the process or products under Certification must be communicated to the Certification Body immediately.

Any modifications to the Audit Scheme will require a monitoring audit within the period of 1 year. If the certificate is withdrawn, the declaration of conformity will no longer be valid.

12. MONITORING AUDITS

A monitoring audit must take place once a year to renew the validity of the Certification. Monitoring audits ensure demonstrated continuous fulfilment with the audit requirements. Monitoring audits must be conducted up to 6 weeks in advance to the date of expiration. Upon a positive outcome of the Certification, the validity will subsequently be renewed for additional year.

Decision-based extensions of the validity of a certificate can be granted in justified cases by Certification Bodies in consultation with RecyClass. Certification Bodies will count with an internal procedure describing the mechanism of the extension. Extensions can be granted for a maximum period of 2 months. An extension of the validity of a certificate will not modify the date of validity for the next period.

13. SUSPENSION OR WITHDRAWAL OF CERTIFICATION

Suspension of Certification is a measure intended to protect the integrity of the Certification. Certification Bodies may suspend an issued Certification in case of one of the following cases:

- Non-conformities found during a monitoring audit

- Requirements defined in the Audit Scheme and Certification Agreement are no longer fulfilled by the Certification holder
- Mandatory corrective actions defined in the Audit Report have not been adapted within the specified timeframe.

Certification Bodies will notify the suspension of Certification to certification holders. The information will include:

- Justification for the suspension
- Period of the suspension
- Practicalities of implementing the suspension – communication to costumers, stakeholders, regulations as well as handling of products with claim or logo already on the market.
- Conditions to be fulfilled by the certification holder for lifting the suspension.

Certification may be revoked when mandatory corrective actions where not fulfilled, or suspension of a Certification had no effect. Certification Bodies may also revoke a Certification directly.

In case of withdrawal of the Certification, Certification Bodies must request certification holder to remove claims and logos from all affected products within the custody of the certification holder, clients or directly on the market. Certification holders are also requested to inform related customers by letter.

Certification holders may request the termination of the Certification by contacting the issuing Certification Body.

Certification holders have the right to appeal a decision for withdrawal according to the procedure described in section 7.

Reports of non-conformity of a certification holder according to the Certification Agreement and Certification requirements must be addressed to their respective Certification Bodies. Certification Bodies will investigate the reporting to determine if there is reason for suspension or withdrawal of Certification.

If considered appropriate, RecyClass may request a quality control spot check as described in Section 6. launch an investigation to determine if there is reason for withdrawal of Certification.

In case of a failed spot check audit, Certification will be suspended or withdrawn.

14. CHANGES AFFECTING CERTIFICATION

Changes in the product, process or quality management system that would affect conformity with the Audit Scheme requirements must be communicated to the CB.

When the applicant would like to extend the scope of the conformity assessment, add or remove products or modify the share of recycled content in a certified product or family of products, this must be communicated to their Certification Body who will carry out the necessary actions to amend the Certificate.

Expansion of the Certification can be done after the issue of the Certification via documentation review or on-site audit.

15. 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.

16. COMMUNICATIONS, USE OF CERTIFICATE, CLAIMS AND LOGOS

Audit results, claims and logos can be used on communication materials when referring to certified products and processes – 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 products, companies and production 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

17. MISUSE OF THE CERTIFICATION CLAIMS AND LOGOS

Unauthorized use of the RecyClass logo is not permitted for any products not covered under a license agreement/for any products not covered under a Certification.

Examples of misuse include but are not limited to:

- A company uses the RecyClass logos without being in possession of a valid certificate.
- A certification holder uses the logo with an expired or withdrawn Certificate;
- A certification holder uses the logo on a product or process where changes were made without informing the issuing Certification Body. Change of the process or products requires re-certification or an amendment to the Certificate;
- A certification holder uses the logo for products which were not included under the Certification scope.

RecyClass will launch an investigation in case of suspicion or notification of unauthorised, incorrect, or misleading use of the RecyClass claims, logos and Certificates, whether through negligence or fraud. RecyClass will consider and verify these allegations. RecyClass reserves the right to publish the transgression and or take legal action under civil law (e.g. by lodging a claim for damages).

The right to use Certification logos and claims are issued to the certification holder by the recognised Certification Bodies together with the certificate. In case of verified misuse, Certification Bodies must take appropriate measures

with certification holders and demand them to implement corrective actions within a determined period of time. In case of failure to comply, Certification can be suspended and withdrawn.

If Certification Bodies would decide to take legal action against unauthorised use of the Certification logo or claims, they would inform RecyClass accordingly.

If RecyClass identifies misuse, the issuing Certification Bodies will be requested to take action.

If you suspect or identify misuse of the logos and claims, please get in touch with RecyClass.

18. ANNEX I: TERMS OF USE OF CERTIFICATION

Certification holders 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/IEC 17065:2013.

- Certification holders must fulfil all Certification requirements as described during the audit preparation. Any significant changes to the process or products under Certification must be communicated to the Certification Body immediately.
- Use of Claims and logos are restricted to certified products and processes following the guidelines provided by the document "Use of Claim".
- Certification holders must maintain records and address any complaints submitted related to a valid Certification.
- Certification holders 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, certification holder must stop the use of the associated claim and logos.
- Certification holders must inform the relevant Certification Body of any changes that may affect the ability of a package to conform with the Certification requirements. Certification holders might request an extension of the Certification.

19. ANNEX II: TABLE OF CHANGES

Version	Date	Section	Update description
2.1	November 2021	2.2	Added point on the communication of changes to home Accreditation Body.
2.1	November 2021	5	Addition of a description of requirements for Accreditation Bodies.
2.1	November 2021	10.1	Wording clarification.
2.1	November 2021	12	Description of provisions for the extension of certificates.

Version	Date	Section	Update description
2.0	July 2021	2	Additional explanation added on the procedure for changes and updates within the Certification Scheme.
2.0	July 2021	3	Added requirements on the use of official documentation.
2.0	July 2021	4	Added explanations on the communication between RecyClass and CBs.
2.0	July 2021	7	Editorial changes.
2.0	July 2021	8	Detailed explanation for CBs on how to handle complaints from Certification holders, as well as RecyClass role.
2.0	July 2021	9	Clarification, editorial change.
2.0	July 2021	10	Addition of procedure steps and clarifications for the Certification procedure.
2.0	July 2021	11	New section specifically on validity of Certification.
2.0	July 2021	12	New section specifically on monitoring audits.
2.0	July 2021	13	New section specifically on suspension or withdrawal of Certifications. Clarifications were added.
2.0	July 2021	14	New section specifically on changes affecting Certification.

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2.0	July 2021	17	New section specifically on misuse of the Certification claims and logos.
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