

RecyClass

CERTIFICATION BODIES & AUDITORS REQUIREMENTS

RECYCLABILITY CERTIFICATION

CONTENT

CONTENT	2
1. INTRODUCTION	3
2. RECOGNITION OF CERTIFICATION BODIES.....	3
2.1 Procedure.....	3
3. CERTIFICATION BODIES APPLICATION REQUIREMENTS.....	4
3.1 Certification Bodies Operational Requirements & Responsibilities.....	5
3.2 Certification Bodies Geographical Area	6
4. AUDITORS REQUIREMENTS AND QUALIFICATIONS	6
4.1 Technical requirements.....	6
5. CERTIFICATION BODIES AND AUDITOR’S IMPARTIALITY	7
6. BREACH OF THE COOPERATION AGREEMENT AND REMOVAL OF AUDITORS.....	7
7. FREE COMPETITION AMONG CERTIFICATION BODIES.....	8
8. ANNEX I: CODE OF CONDUCT AGREEMENT	9
General Statement.....	9
Conflicts of Interest.....	9
Enforcement and compliance	10
9. ANNEX II: TABLE OF CHANGES.....	11

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1. INTRODUCTION

This document lays down requirements, qualifications and conditions for Certification Bodies and accredited auditors of RecyClass Recyclability Certifications. As reported in the Recyclability Methodology document¹, RecyClass counts with three types of recyclability assessments: the Design for Recycling, the Letter of Compatibility and the Recyclability Rate. The first two assessments are valid for all Europe, while the Recyclability Rate Certification is country specific. Certification Bodies are recognised to issue Recyclability Rate Certifications in a certain geographical area based on their experience and connection with local authorities.

This document provides guidance to ensure that Certification Bodies and its auditors perform RecyClass audits in a consistent and independent manner ensuring the integrity of the RecyClass Certification Schemes.

RecyClass audits are operated by accredited auditors within the Certification Bodies. Certification Bodies are recognised third-party conformity assessment bodies issuing a RecyClass Certification.

2. RECOGNITION OF CERTIFICATION BODIES

2.1 PROCEDURE

- 1) Applicant Certification Body submit its application request to the RecyClass Steering Board specifying the scope of its recognition (i.e., geographical area) and its appointed auditors.
- 2) The RecyClass Steering Board evaluates each Certification Body and its requested scope of recognition according to the requirements set forth in this document. RecyClass may contact relevant institutions and organisations to ensure that the Certification Body complies with the requirements.
- 3) Upon acceptance of its application request, the Certification Body receives a template of the Cooperation Agreement and NDA with RecyClass that both parties shall sign.
- 4) Certification Body's auditors must attend the Accreditation Course and pass the exam to become recognised auditors. Each auditor must sign the Code of Conduct as referred in Annex 1 before issuing any Certificate.

¹ RecyClass Recyclability Methodology document is available [here](#)

- 5) The recognition of the Certification Body and its auditors will be communicated via the RecyClass official channels. The name, address and contact of the Certification Body will also be added to the list of recognised Certification Bodies available on the RecyClass website².
- 6) Any change within the Certification Body that would lead to non-compliance with the Cooperation Agreement must be communicated to RecyClass who will reevaluate the Certification Body compliance with the application requirements.
- 7) An up-to-date list of all Certification Bodies recognised to perform RecyClass Certification audits is available on the RecyClass website.
- 8) Certification Bodies may extend their scope of their recognition (i.e., geographical area) by submitting an application to RecyClass. They must justify their compliance with the requirements set forth in this document. The Steering Board will evaluate the request for an extension. If positive, an Addendum to the Cooperation Agreement must be signed by both parties.

3. CERTIFICATION BODIES APPLICATION REQUIREMENTS

Certification Bodies must comply with the following requirements after applying to become a recognised Certification Body:

- Certification Bodies must be legal entities or defined as part of a legal entity.
- Be accredited for the relevant European standard on the basis of ISO/IEC 17065 by a signatory of the EA-MLA.
- Certification Bodies must be competent organisations with demonstrated references in the field of plastics packaging and recyclability.
- Certification Bodies must have mechanisms in place to ensure impartiality of the organisation and its auditors during the performance of their activities.
- Certification Bodies must have financial stability and must dispose of insurance or reserves to cover any liabilities arising from its operations.

² List of recognized Certification Bodies available at www.recyclclass.eu

3.1 CERTIFICATION BODIES OPERATIONAL REQUIREMENTS & RESPONSIBILITIES

- Certification Bodies must be recognised by RecyClass; this procedure is official upon the signature of the Cooperation Agreement between both parties.
- Certification Bodies must have a quality management system in place which ensures compliance with the requirements laid down in this document. Procedures to identify and manage any non-conformities detected must be included along with a procedure to implement corrective actions.
- Certification Bodies are responsible for the competence and performance of its auditors. Certification Bodies must have in place mechanisms to ensure competence of all auditors. Certification Bodies must maintain updated records of education, training, and experience of all accredited auditors.
- Certification Bodies and its auditors should attend the RecyClass Auditors Workshop organised annually where any new requirements or recent developments related to the Certifications are discussed. At least one auditor of each Certification Body must attend once a year.
- Certification Bodies procedures and operations must be non-discriminatory and applicants should not be refused for any reason which is not detailed in this document or in the document “Quality Management and Procedures”.
- Certification Bodies must ensure audits are conducted using RecyClass official templates at the time of the audit while referring to the most recent version of the document “RecyClass Recyclability Methodology”, “Audit Report” and any other relevant documents. Certification Bodies must maintain an active correspondence with RecyClass before and during the audit of a product to request a product code, a third-party code and share the final Certificate.
- Certification Bodies must properly record all issued RecyClass Recyclability Certifications and store internally the Audit Report, and any relevant related documentation for the duration of the certificate’s validity.
- Certification Bodies remain responsible for the certificates it has issued until the certificate expires; the certificate is terminated by the Applicant; or the certificate is withdrawn by the issuing Certification Body.
- Certification Bodies must recognise and accept the validity of RecyClass Certificates issued by other recognised Certification Bodies. This recognition does not imply legal responsibility. Certification Bodies must appoint a lead auditor who will act as a contact person between RecyClass and the Certification Body ensuring a smooth communication between both organisations related to quality management, new applications, and accredited auditors.

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- Certification Bodies must communicate to RecyClass if any changes to their accreditation takes place or if their home-National Accreditation Body withdraws accreditation.
- Certification Bodies must ensure that all auditors receive and understand any updates or communications from RecyClass.

3.2 CERTIFICATION BODIES GEOGRAPHICAL AREA

Certification Bodies must make reasonable endeavours to comply with the following requirements in order to be recognised to issue Recyclability Rate Certifications for a given geographical area:

- Certification Bodies must have the knowledge of the plastic waste management system in the country of interest, including household collection and availability of sorting and recycling infrastructures.
- Certification Bodies must demonstrate their knowledge of the plastic waste management system with their connections to the local EPR scheme(s), and possibly other relevant organisations and institutions.
- Certification Bodies must maintain regular communication to the local EPR scheme(s) to follow the evolution of the plastic waste management system in place.
- Certification Bodies must ensure audits are conducted using the latest status of the plastic waste management system in place.

4. AUDITORS REQUIREMENTS AND QUALIFICATIONS

To ensure a uniformly high standard of RecyClass Certification audits, auditors must meet the following requirements listed below. Additionally, all auditors must have attended a RecyClass Auditors Training for Recycled Content Traceability and have passed the final exam.

4.1 TECHNICAL REQUIREMENTS

An accredited auditor under a Certification Body must comply with the following requirements:

- Technical knowledge about chemistry and physical properties of polymers.
- Technical knowledge about plastic packaging construction.
- Good understanding of the functioning of plastic recycling processes relevant to the RecyClass Certification application.
- Above-average knowledge of the main technical challenges for plastics recycling.

- Demonstrated competence by submitting proper documentation (e.g., CV, copies of certificates of all relevant academic and professional qualifications, work experience and experience as an expert, references, reports, training).
- Demonstration of sufficient practical experience in the field of activity and the scope of expertise.
- The applicant shows above average theoretical knowledge, practical skills, and the ability to carry out an expert opinion / study.
- The applicant must have access to the facilities necessary to fulfil his duties as auditor.
- The auditor must be able to ensure all audits will not be bound by any instructions but independent work.

5. CERTIFICATION BODIES AND AUDITOR'S IMPARTIALITY

Certification Bodies and auditors must be independent and impartial organisations, with no conflict of interest with the applicant of a RecyClass Certification.

Certification Bodies must have mechanisms in place to identify and eliminate or minimise any risks to impartiality. Any risks must be communicated to RecyClass who will determine if the measures implemented are sufficient to continue operating as a recognised Certification Body. In addition, accredited auditors must sign and operate accordingly to the RecyClass code of conduct (Annex I). The Code of Conduct and this document are complementary.

Where the Certification Body is a part of a legal entity, it must ensure that separate activities do not compromise the independence of the Certifications.

6. BREACH OF THE COOPERATION AGREEMENT AND REMOVAL OF AUDITORS

Any non-conformities or non-compliant behaviour of the Certification Body or its auditors will be communicated to RecyClass immediately who will seek remedy for a period of 3 months.

If unsuccessful, RecyClass will present a dossier of non-conformities to the Steering Board who will assess and evaluate the Certification Body or its auditors in a one-to-one basis. RecyClass reserves the right to remove the recognition of an auditor or to terminate the Cooperation Agreement altogether between a Certification Body and RecyClass upon the outcome of the Certification Body or auditor

evaluation. The Certification Body will dispose of 60 days to appeal the final decision of the Steering Board.

On the other hand, a Certification Body may remove an auditor from the list of recognised auditors or terminate the Cooperation Agreement with RecyClass by sending an email to info@recyclclass.eu. The name of the Certification Body will be removed from the RecyClass website.

7. FREE COMPETITION AMONG CERTIFICATION BODIES

Companies who request a RecyClass Certification may freely contract any Certification Body listed on the RecyClass website operating in the country or group of countries for which the Certificate has been requested. Applicants may also choose to change from one Certification Body to another to recertify their package.

In case of the recertification of a Product with a different Certification Body, the new Certification Body must receive all relevant documentation and reports from the previous audit which must be considered during the recertification process. This information must be provided by the applicant.

8. ANNEX I: CODE OF CONDUCT AGREEMENT

The below-signed auditor voluntary agrees to implement the following Code of Conduct Agreement to govern the future conduct in connection with the RecyClass Certification:

GENERAL STATEMENT

The auditor in promoting high standards of code of conduct shall:

- 1 Act solely in the best interest of RecyClass, and the Audited Company, in the performance of his/her duties.
- 2 Conduct itself professionally, with truth, accuracy, fairness and responsibility.
- 3 Not misrepresent his/her qualifications, competence or experience.
- 4 Nor undertake assignments beyond his/her capabilities.
- 5 Treat in a Confidential manner all information gained in relation to any of the Audited Company's identified activities, unless authorised in writing to disclose such information by the company.
- 6 Such information may include, inter alia: product, written material or other information in tangible or intangible form, clearly identified as Confidential, relating to the audited product.
- 7 Treat in a Confidential manner all information which may be considered Confidential when the prudent judgment of the auditor could determine that such information is Confidential and recognize that the auditor may receive information that is not identified clearly as Confidential, but which may be perceived as Confidential.
- 8 Will not disclose any details of audit findings outside of the organisation, neither during nor after the audit process.
- 9 Not intentionally communicate false or misleading information which may compromise the integrity of the certification processes.
- 10 Be able to act professionally under adverse pressure from companies being audited.
- 11 Inform RecyClass about any change in his/her employment position.
- 12 Report to RecyClass any new, updated or withdrawn audit.
- 13 Use the reference codes provided by RecyClass in order to issue a Certificate and Audit Report.
- 14 Implement all third-party auditor recommendations.

CONFLICTS OF INTEREST

The auditor will perform his/her duties conscientiously, honestly, and in accordance with the best interests of RecyClass. The auditor must not use his/her positions, or the knowledge gained as a result of their positions for private or personal advantage. Regardless of the circumstances, if the auditor

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senses that a course of action he/she has pursued or he/she is presently pursuing or is considering pursuing may involve him in a conflict of interest with RecyClass and/or audited company, he/she should immediately communicate all the facts to the Certification Body, RecyClass and audited company.

ENFORCEMENT AND COMPLIANCE

During the audit process, the Code of Conduct and Requirements for Certification Bodies and auditors described in the document “Certification Bodies and Auditors Requirements” is the accepted practices that surround the accredited auditor. Violations of these are serious in nature and will result in swift intervention by RecyClass according to section 6 of the document “Certification Bodies and Auditors Requirements”.

All sanctions against an auditor or its Certification Body will involve a full investigation before any actions are taken. RecyClass is not required to apply progressive discipline in situations which are serious in nature and warrant severe non-financial penalties up to and including permanent removal of the auditor accreditation.

The auditor will cooperate fully with an inquiry in the event of a breach of this Code of Conduct.

For RecyClass:

Signature:

Name:

Address:

Date:

The auditor:

Signature:

Name:

Address:

Date:

9. ANNEX II: TABLE OF CHANGES

<i>Version</i>	<i>Date</i>	<i>Section</i>	<i>Update description</i>
2.1	January 2022	1	Clarifications relating to the types of recyclability certifications and their scope.
2.1	January 2022	2.1	Additional requirements relating to the accreditation procedure and the request to extend the geographical area
2.1	January 2022	3.2	New section relating to the geographical area and the requirements the Certification Bodies must comply with.
2.0	July 2021	3	Additional requirements relating to accreditation of Certification Bodies according to ISO/IEC 17065
2.0	July 2021	3.1	Addition of clarifications such as signature of the Cooperation Agreement. Addition of requirements – recognition of other issued certificates, communication with RecyClass.
2.0	July 2021	6	Editorial changes

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