

RecyClass

AUDIT SCHEME
MODULE A:
FOOD CONTACT

**RECYCLING PROCESS
CERTIFICATION**

RECYCLED PLASTICS

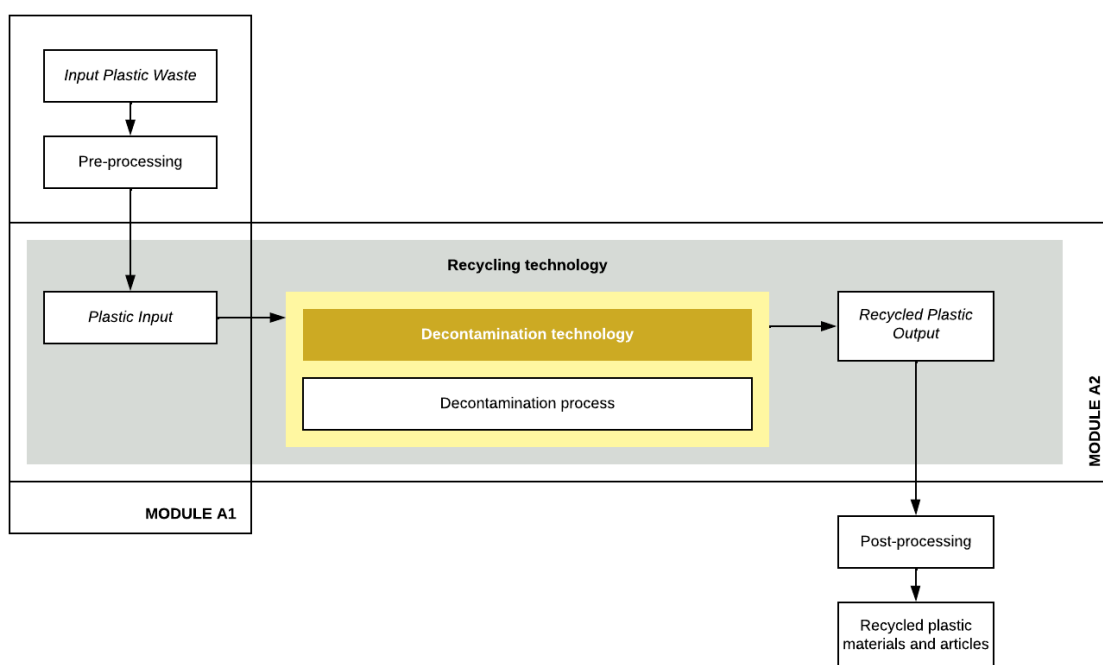
CONTENT

1.	Introduction.....	3
2.	Terms and definitions.....	4
3.	Module A1 Certification Details.....	5
3.1	Administration	5
3.2	Input requirements.....	6
3.3	Recycling process	7
3.4	Quality management.....	8
3.5	Health and safety.....	9
4.	MODULE A2 Certification Details.....	10
4.1	Administration	10
4.2	Input requirements.....	11
4.3	Decontamination process.....	12
4.4	Control on food contact recycled plastic	13
4.5	Quality management.....	13
4.6	Health and safety.....	14
5.	Annex I: Definitions	16

1. INTRODUCTION

Module A describes a set of additional requirements for *Recycling Processes*¹ producing recycled plastic material intended to come into contact with foods according to the [new Regulation replacing Reg. \(EC\) 282/2008](#). *Organisations* applying for *Certification* may extend the conformity of the core requirements with this Module for added recognition. These may be recyclers or converters as defined in Annex 1 of this document that will be referred to as *Organisations* in this Module. Requirements are classified between section A1 and section A2 and may be applied to *Organisations* with Processes as described in Figure 1.

Figure 1: Overview of the process including the definitions set in Regulation (EC) and the Module of the Certification



- **Module A1** covers additional requirements to be met by *Organisations* performing *Pre-processing* activities to treat waste in order to make it a suitable *Plastic input* for the *Decontamination process*. Module A1 ensures traceability of *Input Plastic Waste* and compliance with requirements set in Article 6, 3 of the new Regulation replacing Reg. (EC) 282/2008.
- **Module A2** covers additional requirements to be met by *Organisations* performing a specific sequence of unit operations which goal is to remove contamination from *Plastic Input* in order to make it suitable for contact with food, using a specific decontamination technology.

In some cases, plastic recyclers receive waste material and perform waste management operations: sorting, shredding and washing to produce a flake that will be a *Plastic input* according to the new Regulation replacing Reg. (EC)

¹ *Recycling Process including pre-processing and decontamination technologies. Please see Annex I.*

282/2008. However, they do not perform a *Decontamination process* and therefore, they are not producing a food contact *Recycled Plastic*. In the new Regulation replacing Reg. (EC) 282/2008, these operations are considered *Pre-processing* (only a part of *Recycling Process*) and correspond to Module A1 of this *Certification*. Requirements in Module A1 focus on the quality control of the *Input Plastic Waste* to provide assurance of its compliance with the requirements stipulated in Annex I table 1 “specification of plastic input” and with the process authorisation of the new Regulation replacing Reg. (EC) 282/2008.

Organisations performing the *Decontamination Process* will typically receive a product (flake or pellet) that has already gone through the *Pre-processing* stage and may have reached the End-of-Waste status. The decontamination operation might be performed by *Organisations* that do not hold a waste permit as they are no longer treating a waste. These companies are usually converters that will decontaminate the recycled plastics and will directly produce a product. These companies will be eligible only for section A2 of this module. The requirements described in A2 focus on the compliance of the *Decontamination process* with the requirements set in the Authorisation, EFSA opinion and Compliance Monitoring Summary Sheet (CMSS).

Certification does not constitute proof of food contact approval. It rather provides confidence that the *Organisation* has the right procedures in place to conduct *Pre-processing activities* or a *Decontamination Process* to produce food contact materials in compliance with their CMSS. Certification ensures the process runs in accordance with the defined specifications set in Annex I of the new Regulation replacing Reg. (EC) 282/2008 and makes sure that the presence of a quality control routine is in place.

It must be noted that Module A only addresses *Recycling processes* that are considered suitable according to the new Regulation replacing Reg. (EC) 282/2008. Processes currently under evaluation as novel technologies are not considered in this Module and may only apply for the core requirements of *Certification*.

2.TERMS AND DEFINITIONS

Defined terms are marked in *italics* and start with a capital letter. This document uses additional definitions as set in Article 2 of the new Regulation replacing Reg. (EC) 282/2008. Which must be considered to avoid confusion during the evaluation of the compliance with the audit requirements described in the following sections.

3. MODULE A1 CERTIFICATION DETAILS

Module A1 requirements cover the treatment of *Plastic Input Waste* and the production of a *Plastic Input* constituting the input material for the *Decontamination Process*. This Module is an extension of requirements and must be combined with the core requirements described in the document *Audit Scheme*.

SECTION A1.1 ADMINISTRATION

A1.1.1 RECORD LIBRARY

Organisation has documented procedures in place to record information regarding the Pre-Processing Process at a *Site* including:

- CoA in computer database
- *Recycled Output* products list
- Delivery note
- Int. transport papers
- Transport order
- Export papers
- Export invoices
- Weighing tickets
- Loading trucks for delivery
- Others

Assessment level	Minor non-conformity	Evidence required
2	n	y

A1.1.2 INTERNAL AUDITING

Organisation has an internal procedure in place to verify the traceability established at the site. There is at least a yearly check where a *Batch of Plastic Input* is proven to be traceable to an *Incoming Input Plastic Waste* and its supplier.

Assessment level	Minor non-conformity	Evidence required
1	n	y

SECTION A1.2 INPUT REQUIREMENTS

A1.2.1 INPUT PLASTIC WASTE COLLECTION – PURCHASE SPECIFICATION

Input Plastic Waste originates from municipal waste or food retail via separate collection; or other businesses where it was only intended and used for contact with foods including pre-consumer waste and waste discarded from a recycling scheme. Specifications, requirements and derogations applicable to the use of the applied technology related to the *Input Plastic Waste* must be fulfilled (Annex I – table 4 and 5, found on the new Regulation replacing Reg. (EC) 282/2008.

Assessment level	Minor non-conformity	Evidence required
1	n	y

A1.2.2 INPUT PLASTIC WASTE REQUIREMENTS – COLLECTION

Recycler ensures that *Input Plastic Waste* meets the following requirements which are in line with the new Regulation replacing Reg. (EC) 282/2008 for recycling plastic material intended for contact with food:

- Waste originates from municipal waste or food retail or other businesses if it was intended and used for contact with food;
- Origin of the waste is compliant with Regulation (EC) 10/2011;
- *Input Plastic Waste* was collected via separate collection (definition for separate collection can be found in Article 6 (2) of this Regulation);
- Plastic materials and articles other than the plastic intended for food contact use is reduced to a level specified in the requirements of the recycler and which does not compromise the level of decontamination.

If module A1 has been validated on this facility, this section does not apply.

Assessment level	Minor non-conformity	Evidence required
1	y	y

A1.2.3 INPUT PLASTIC WASTE COMPLIANCE WITH REG. (EC) 10/2011

The *Input Plastic Waste* originates only from plastic materials and articles manufactured in accordance with Regulation (EU) No 10/2011 or recycled plastic materials and articles manufactured in accordance with the new Regulation replacing Reg. (EC) 282/2008. If Recycler is receiving *Input Plastic Waste* which originated outside of Europe, there is documented evidence that *Input Plastic Waste* entering *Pre-processing* complies with the requirements stipulated in Regulation (EC) 10/2011.

Assessment level	Minor non-conformity	Evidence required
1	n	y

A1.2.4 QUALITY ASSURANCE SYSTEM – COLLECTION

Organisation verifies that *Input Plastic Waste* is collected and sorted within organisations with a quality assurance system in place ensuring compliance with Regulation (EC) 10/2011 and traceability of the material.

Assessment level	Minor non-conformity	Evidence required

2	y	y
---	---	---

A1.2.5 BATCH DEFINITION

Batches are defined at the site for (i) *Input Plastic Waste*, (ii) *Recycled Plastic* and (iii) any other intermediate material generated during the process.

Assessment level	Minor non-conformity	Evidence required
1	y	y

A1.2.6 BALES INPUT QUALITY CONTROL

Organisation has structured and consistent procedures² in place to determine the quality of incoming bales and their percentage of non-food contact articles contained in the batch against specification. There is a SOP to proceed with the quality check specifying a batch and frequency of testing. There is a SOP to process complying batches and reject or treat adequately non-compliant batches. Results of the quality check must be documented and stored.

Assessment level	Minor non-conformity	Evidence required
1	n	y

SECTION A1.3 RECYCLING PROCESS – PRE-PROCESSING

A1.3.1 USE OF CHEMICALS

Use of any chemicals within the Pre-processing operations which do not introduce a safety risk in the final product. This includes but it is not restricted to lubricants and detergents.

Assessment level	Minor non-conformity	Evidence required
1	y	y

A1.3.2 WASHING PROCESS CONTROL PARAMETERS

The washing process parameters are internally described. There is a SOP in place to ensure compliance with the determined control parameters for washing of the flakes. Any deviation is recorded and managed. EFSA opinion parameters should be considered if applicable.

Any changes on the control parameters are duly justified and recorded.

Assessment level	Minor non-conformity	Evidence required
------------------	----------------------	-------------------

² A procedure is currently available for the suitable technology “mechanical recycling of PET: “Methodology to check the quality of baled PET waste”. This document can be used as guidance.

1	y	y
---	---	---

A1.3.3 RINSING PROCESS CONTROL PARAMETERS

The rinsing process parameters are internally described and show the efficiency of the rinsing process. There is a SOP in place to ensure compliance with the determined control parameters. Any deviation is recorded and managed. EFSA opinion parameters should be considered if applicable. Any changes on the control parameters are duly justified and recorded.

Assessment level	Minor non-conformity	Evidence required
1	y	y

SECTION A1.4 QUALITY MANAGEMENT

A1.4.1 PREVENTING INCIDENTAL CONTAMINATION

There are internal procedures established within the daily operation of the site to prevent incidental contamination of material.

Assessment level	Minor non-conformity	Evidence required
1	y	n

A1.4.2 OUT OF SPECIFICATION LOAD PROCEDURE

Documented procedure available for dealing with deliveries of *Input Plastic Waste* which are not within the agreed specification. Procedures should detail how the supplier is informed of the discrepancy (including timeframes) against the specification and what testing is carried out and supporting information recorded.

Assessment level	Minor non-conformity	Evidence required
1	y	y

A1.4.3 LABELLING OF *RECYCLED PLASTIC*

Organisation has a labelling procedure in place for the individual batches of *Recycled Plastic* which are identified by a unique number and the name of the manufacturing stage they originate from.

Assessment level	Minor non-conformity	Evidence required
1	n	y

A1.4.4 BATCH RECALL PROCEDURE

There is an internal system in place to remove a batch of material from its current classification if the requirements such as the conditions defined in the Annex I Table 1 (5) of the new Regulation replacing Reg. (EC) 282/2008 on specification of *Plastic input* are not met. The system and previous recalls are documented.

Assessment level	Minor non-conformity	Evidence required
2	y	n

SECTION A1.5 HEALTH AND SAFETY

A1.5.1 ACCESS RESTRICTIONS

All areas of the Site are restricted to personnel only. There is a system in place to register and record visitors.

Assessment level	Minor non-conformity	Evidence required
1	y	n

A1.5.2 FIRE RISK MANAGEMENT

There is a SOP in place to ensure that fire risk within the recycling plant is minimised.

Assessment level	Minor non-conformity	Evidence required
1	y	n

A1.5.3 PEST CONTROL SYSTEM

Organisation has a pest control system in place for *Site*.

Assessment level	Minor non-conformity	Evidence required
2	y	n

MODULE A2 CERTIFICATION DETAILS

Module A2 requirements cover the production of a food contact *Recycled Plastic*. Conformity with this module is typically an extension of Module A1 for Recyclers. Organisations eligible must count with an Authorization from the European Commission to produce a food contact Recycled Plastic and must be located in the EU+3.

Organisations without a waste permit but operating a Decontamination Process may exceptionally apply for Module A2 in combination with RecyClass Recycled Plastics Traceability Conformity Assessment Scheme.

This module is optional, and its relevance should be assessed against the activities of *Organisation*.

SECTION A2.1 ADMINISTRATION

A2.1.1 DOCUMENTATION

Organisation is operating a decontamination process listed as a suitable technology according to Annex I of the new Regulation replacing Reg. (EC) 282/2008. *Organisation* has a valid Authorization Decision issued by the European Commission for the production of food contact *Recycled Plastics* according to the new Regulation replacing Reg. (EC) 282/2008. The company shall have available:

- The CMSS
- The following registration numbers: RAN – recycling authorisation number; RON – recycling operator number (recyclers); RIN – recycling installation number; RSN – recycling scheme number
- The individual authorization process decision if needed

Assessment level	Minor non-conformity	Evidence required
1	n	y

A2.1.2 RECORD LIBRARY

Organisation has documented procedures in place to record information regarding the *Pre-Processing Process* at a *Site* including:

- CoA in computer database
- Packaging list
- Delivery note
- Int. transport papers
- Cleaning certificate
- Transport order
- Export papers
- Export invoices
- Weighing tickets
- Loading trucks for delivery
- Others

If module A1 has been validated on this facility, this section does not apply. In this case, section 3.1.1 must be applied with an assessment level 1.

Assessment level	Minor non-conformity	Evidence required
1	n	y

A2.1.3 INTERNAL AUDITING

Organisation has an internal procedure in place to verify the traceability established at the site. There is at least a yearly check where a *Batch of Recycled Plastic* is proven to be traceable to *Plastic Input* and its supplier.

If module A1 has been validated on this facility, this section does not apply.

Assessment level	Minor non-conformity	Evidence required
2	y	n

SECTION A2.2 INPUT REQUIREMENTS

A2.2.1 COMPLIANCE WITH SPECIFICATION OF *PLASTIC INPUT*

There is a procedure in place to ensure that the *Plastic Input* meets the specification set in Annex I Table 1 (3) and (5) of the new Regulation replacing Reg. (EC) 282/2008. The procedure must include a monitoring system which ensures regular verification, corrective actions and recording of the process. Data may be provided by the supplier of *Plastic Input* on:

- Information on the procedures that have been set in place to identify and prevent contamination.
- Assurance of compliance of *Plastic Input* with input specification requirements according to the used suitable technology

If module A1 has been validated on this facility, this section does not apply.

Assessment level	Minor non-conformity	Evidence required
1	y	y

A2.2.2 INPUT PLASTIC WASTE REQUIREMENTS - COLLECTION

Recycler ensures that Input Plastic Waste meets the following requirements which are in line with the new Regulation replacing Reg. (EC) 282/2008:

- Waste originates from municipal waste or food retail or other businesses if it was intended and used for contact with food;
- Origin of the waste is compliant with Regulation (EC) 10/2011;
- Input Plastic Waste was collected via separate collection;
- Plastic materials and articles other than the plastic intended for food contact use is reduced to a level specified in the requirements of the recycler and which does not compromise the level of decontamination.

If module A1 has been validated on this facility, this section does not apply.

Assessment level	Minor non-conformity	Evidence required
1	y	y

A2.2.3 QUALITY ASSURANCE SYSTEM – COLLECTION & PRE-PROCESSING

Organisation verifies that *Plastic Input* purchased has been treated within an organisation with a quality assurance system in place as defined in Article 6 of the new Regulation replacing Reg. (EC) 282/2008 ensuring the traceability of *Input Plastic Waste* and the origin of the material as compliant with Regulation (EC) 10/2011.

Assessment level	Minor non-conformity	Evidence required
2	y	y

A2.2.4 BATCH DEFINITION

Batches are defined at the site for (ii) *Plastic Input* and (iii) any other intermediate material generated during the process.

If module A1 has been validated on this facility, this section does not apply.

Assessment level	Minor non-conformity	Evidence required
1	n	y

SECTION A2.3 RECYCLING PROCESS – DECONTAMINATION

A2.3.1 COMPLIANCE MONITORING SUMMARY SHEET

The CMSS is duly completed following the template set out in Annex II of the new Regulation replacing Reg. (EC) 282/2008. It describes the Recycling installation, includes the required registration numbers, provide information on the operation of the decontamination process, and on the quality assurance system in place.

Assessment level	Minor non-conformity	Evidence required
1	n	y

A2.3.2 SUITABLE TECHNOLOGY RESTRICTIONS

The Organisation operates *Decontamination Process* in line with the process specifications described in the CMSS and in Annex I Table 1 of the new Regulation replacing Reg. (EC) 282/2008.

Assessment level	Minor non-conformity	Evidence required
1	y	n

A2.3.3 CRITICAL DECONTAMINATION OPERATIONS

Critical steps of the process as defined in the EFSA opinion are implemented as described and correctly reported in the CMSS. There are SOP in place for each operation defined as critical in the EFSA opinion.

Assessment level	Minor non-conformity	Evidence required
1	y	n

SECTION A2.4 CONTROL ON FOOD CONTACT *RECYCLED PLASTIC*

A2.4.1 INTENDED USE IDENTIFIABLE

The intended use of the *Recycled Plastic* is clearly detailed in relevant documentation.

Assessment level	Minor non-conformity	Evidence required
1	y	y

A2.4.2 LABELLING OF *RECYCLED PLASTIC*

Organisation has a labelling procedure in place in accordance with the new Regulation replacing Reg. (EC) 282/2008, Article 5, 3 and 4. Individual Batches of Recycled Plastics are identified by a unique number and the name of the manufacturing stage they originate from.

Additionally, containers of *Recycled Plastics* contain the following information: Batch number, registry number of the decontamination installation (RIN), percentage by weight of recycled content, maximum percentage of recycled content that the final recycled plastic may contain, any additional instructions. The size of the label as well as the font size must be in accordance with the new Regulation replacing Reg. (EC) 282/2008, Article 5, 3 and 4.

Labelling may be omitted from fixed containers mounted in installations or on vehicles.

Assessment level	Minor non-conformity	Evidence required
1	y	y

A2.4.3 *RECYCLED PLASTIC* REQUIREMENTS

There are records in place that the *Plastic Output* of the applied decontamination process meets the specifications set out in column 6 of table 1 of Annex I of the new Regulation replacing Reg. (EC) 282/2008 for the relevant recycling technology and, if applicable, the specific criteria set out in the authorisation.

Assessment level	Minor non-conformity	Evidence required
1	y	y

SECTION A2.5 QUALITY MANAGEMENT

A2.5.1 BATCH QUALITY REPOSITORY OF RECORDS

Organisation has records in place on the quality of individual batches of food contact *Recycled Plastic* as defined in the CMSS. Records are available for at least 5 years.

Assessment level	Minor non-conformity	Evidence required
2	y	y

A2.5.2 DECLARATION OF COMPLIANCE

Organisation has a declaration of compliance established to accompany all *Batches* of *Recycled Plastic*, in order to establish the identity of the *Organisation*, the recycled origin of the plastic, and to provide instructions to the converters and final users regarding its use. The template used is the one defined in Annex III of the new Regulation replacing Reg. (EC) 282/2008.

Assessment level	Minor non-conformity	Evidence required
1	y	y

A2.5.3 STANDARD OPERATING PROCEDURES

Documented evidence is present that all relevant Standard Operating Procedures (SOP) are being applied in *Decontamination Process* as described in the CMSS.

SOP include procedures for at least the following cases:

- the critical limits of the process parameters are exceeded
- the handling of non-conformities and the management of food safety emergencies.

Assessment level	Minor non-conformity	Evidence required
1	y	y

SECTION A2.6 HEALTH AND SAFETY

A2.6.1 ACCESS RESTRICTIONS

All areas of the *Site* are restricted to personnel only. There is a system in place to register and record visitors.

Assessment level	Minor non-conformity	Evidence required
1	y	n

A2.6.2 FIRE RISK MANAGEMENT

There is a SOP in place to ensure that fire risk within the recycling plant is minimised.

Assessment level	Minor non-conformity	Evidence required
1	y	n

A2.6.3 PEST CONTROL SYSTEM

Organisation has a pest control system in place for *Site*.

Assessment level	Minor non-conformity	Evidence required
2	y	n

ANNEX I: DEFINITIONS

Definitions from the new Regulation on recycled plastic materials and articles intended to come into contact with foods and repealing Reg. (EC) N° 282/2008.

Organisation

In this Module *Organisations* are recyclers or converters applying for *Certification* for a *Recycling Process* at a *Site*. *Note 1.* ‘recycler’ means any natural or legal person who applies a decontamination process; *Note 2.* ‘converter’ means any natural or legal person that carries out one or more post-processing unit operations.

Recycling Process

means a sequence of unit operations that is intended to manufacture recycled plastic materials and articles through pre-processing, a decontamination process and post-processing, and which is based on a specific recycling technology. For the purpose of this document, Recycling Process definition is split between *Pre-processing* in Module A1 and *Decontamination Process* in Module A2.

Pre-processing

means all waste management operations carried out to sort, shred, wash, mix or otherwise treat plastic waste in order to make it suitable for the decontamination process.

Decontamination Process

means a specific sequence of unit operations which together have as primary purpose to remove contamination from plastic input in order to make it suitable for contact with food, using a specific decontamination technology.

Incidental Contamination

means contamination present in plastic input originating from food, from plastic materials and articles intended and used for contact with food, from their use or misuse for non-food purposes, and from the unintentional presence of other substances, materials and articles due to waste management.

Plastic Input

means the plastic materials resulting from pre-processing which are entered into a decontamination process.

Recycled Plastic

means plastic resulting from the decontamination process of a recycling process and plastic resulting from subsequent post-processing operations and that is not yet transformed into recycled plastic materials and articles.

Batch

means a quantity of plastic of the same quality and produced using uniform production parameters at a certain manufacturing stage, stored and contained to exclude mixing with other materials or contamination, and designated as such by a single production number.

RecyClass

c/o Plastic Recyclers Europe
Avenue de Broqueville 12
1150 Brussels – Belgium

Phone : +32 2 315 24 60
info@recyclclass.eu

www.recyclclass.eu