

# RecyClass

## RECYCLASS INTERNAL PROCEDURES

GOVERNANCE &  
TASKS DISTRIBUTION

FOR RECYCLASS STAKEHOLDERS

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# RecyClass

## 1. INTRODUCTION

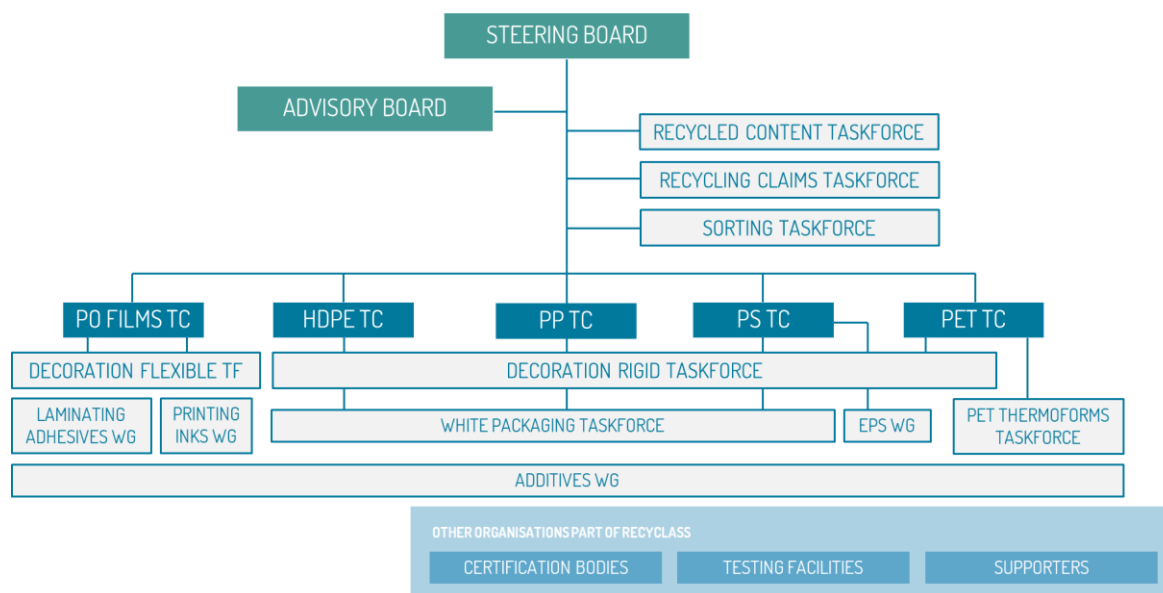
RecyClass is a comprehensive and technical cross-industry initiative that works to advance plastic packaging recyclability and to establish a harmonized approach towards recycled content calculation and traceability in Europe. Activities within RecyClass include the development of Recyclability Evaluation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

RecyClass structure and functions are 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 Recycled Plastic, Recycling Claims, Sorting and Decorations; as well as a group of Supporters, Certification Bodies and Recognized Testing Facilities. 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 chair of RecyClass and the chairs of each Technical Committees. Additionally, the AB appoints 5 representatives, including the AB chair and the chairs of Sorting and Claims Task Forces, to the SB approved by the SB chair. Extension or modification of the SB composition is under

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the responsibility of the SB and must be approved at least by 9 of these members, representing in any case at least the 75%.

All SB participants represent RecyClass and report only to them within the boundaries of the Internal Confidentiality Agreement. The Chair must be a recycler appointed by the Board of PRE and elected during the PRE General Assembly. Each member of the SB is elected for 2 years. If a vacancy occurs before the end of the mandate, elections will be held to nominate a successor for the remainder of the mandate period.

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 via 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 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, Testing Facilities.
- 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 of 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.
- Approve drafted SB meeting minutes.

## 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 Chair which is elected for a period of 2 years. The Chair of the AB steers the work in the AB and serves as a communication point between the AB and the SB. The Chair of the AB has a seat in the RecyClass SB. Additionally, up to 2 representatives of the AB are appointed to the RecyClass SB. The AB also counts with 2 voting seats on the Technical Committees. If a vacancy occurs before the end of the mandate, elections will be held to nominate a successor for the remainder of the mandate period. Each Platinum member has one vote for the election of AB Chair and representatives.

If a participant cannot attend to a decision-making meeting for any reasons outside that meeting, decision can take place via 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.

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.

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The RecyClass AB is established to:

- Raise topics for 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 topics of interest.
- Review and discuss the RecyClass Annual Report.

The AB chair is elected to:

- Chair AB meetings and steer the work that needs to be done by the AB.
- Draft the agenda of the meetings together with RecyClass Team.
- Approve drafted AB meeting minutes.

## 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 of 5 representatives:

- The chair or vice-chair of the corresponding PRE WG who will chair the TC,
- 2 additional representatives of recyclers appointed by PRE.
- 2 elected representatives of the AB.

The Chair approves the participation of other recyclers and AB experts in the committee. Every representative of the TC is elected for 2 years. If a vacancy occurs before the end of the mandate, the departing representative is to be replaced preferably by someone who represents the same RecyClass Member, upon validation by the AB members. In the case no replacement is proposed by the RecyClass Member, or if opposition is received from the AB members, elections will be held to nominate a successor for the remainder of the mandate period. Each Platinum member has one vote for the election of TC representatives. TC meets (physically or online) at least once every quarter in closed sessions. The TC chair 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 via 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 will have the casting vote. A TC representative shall attend all meetings or present a justified excuse. If a TC participant disregards the duties of the group, the Chair reserves the right to appoint a substitute.

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 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 Recyclability Evaluation Procedures where appropriate.
- Support the Certification Bodies in case of uncertainties.
- Conduct the technical aspects of the assessment procedure as described in the RecyClass Recyclability 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).
- Create Working Groups on specific topics.

Each TC chair is established to:

# RecyClass

- Chair TC meetings and lead assessment procedures for recyclability evaluations.
- Draft the agenda of the meetings together with RecyClass Team.
- Approve drafted TC 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 taskforce at any time.

The TF will appoint a Chair that is part of the AB and is elected for a period of 2 years. 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 Chair of the Sorting and Claims TF has a seat in the RecyClass SB. If a vacancy occurs before the end of the mandate, the departing representative is to be replaced preferably by someone who represents the same RecyClass Member, upon validation by the AB members. In the case no replacement is proposed by the RecyClass Member, or if opposition is received from the AB members, elections will be held to nominate a successor for the remainder of the mandate period. Each Platinum member has one vote for the election of the TF Chair.

A taskforce is established to:

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

Each TF chair is established to:

- Chair TF meeting
- Draft the agenda of the meetings together with RecyClass Team.
- Approve drafted TF meeting minutes.
- Steer the work in the TF.
- Raise topics to TCs or AB when necessary.

## 2.5 WORKING GROUPS (WGs)

A working group (WG) is a group of RecyClass experts established by a TC to address a distinct topic. Working groups are established with a specific purpose (test campaign, alignment project, etc.) and are dissolved once the work is completed. 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, with a temporary duration
- Propose solutions and share them with the related TC or TF.

## 2.6 MEMBERS

Members are organisations which are actors of the plastic value chain (raw material producers, converters, brand owners, retailers, machine manufacturers/technology providers) and would like to work jointly with RecyClass to drive circularity. Members must submit a membership form and be approved by RecyClass SB. Members can assign staff members as representatives to RecyClass TCs, TFs and WGs according to their membership level, when covered by an NDA. All representatives need to be covered by the NDA.

Members are established to:

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- Raise topics of discussion to the TCs and AB.
- Support the discussions in the different TCs, TFs, WGs and AB (for Platinum members only)
- Promote and support RecyClass guidelines and methodologies within their membership and/or collaborators.

## 2.7 RECYCLERS

Recyclers are organisations which are members of Plastics Recyclers Europe (PRE), and are willing to support RecyClass discussions with their expertise. Recyclers are appointed by PRE WG Chair based on their interest to join RecyClass TCs, TFs and WGs. Recyclers need to be covered by an NDA to be part of the different group discussions. Recyclers can assign staff members, nominated by the PRE WGs, as representatives to RecyClass TCs, TFs and WGs. Recyclers' staff members appointed to RecyClass TCs, TFs and WGs must be recycling experts.

## 2.8 SUPPORTERS

Supporters are non-profit 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 network. Supporters can join TC, TF and WG meetings when covered by an NDA and accepted by the chair. Only staff members of the Supporter organisation are allowed to join TCs, TFs and WGs, while staff members from external companies participating in the Supporter activities are not accepted. Supporters can also join the AB meetings as guests of the chair. Supporters participate in the Supporters group meetings which are organised regularly. Supporters' participation is not subject to a fee and is open to any non-profit 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 RECOGNISED TESTING FACILITIES

Independent Recognised Testing Facilities are authorised to run the RecyClass Evaluation Protocols under the supervision of RecyClass. Requirements, qualifications, and conditions for Recognised Testing Facilities to conduct the Evaluation Protocols developed by RecyClass Technical Committees and Task Forces are defined in the RecyClass Recognised Testing Facilities - Procedures and Quality Management<sup>1</sup> document.

Recognised Testing Facilities meet every quarter to bring potential improvements to the Protocols and Quick Test Procedures developed by RecyClass. Recognised Testing Facilities can be invited in the TC meetings upon the approval of the chair. Recognised Testing Facilities do not pay a membership fee.

Recognised Testing Facilities group is established to:

- Suggest improvements to the RecyClass Protocols and Quick Test Procedures.

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<sup>1</sup> *RecyClass Recognized Testing Facilities - Procedures and Quality Management*



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- Provide their expertise to the TCs in recyclability assessments when requested by the chair. This can include clarifications about the results, process or challenges found during the tests, as well as their expert opinion.

## 2.10 CERTIFICATION BODIES (CBs)

Certification Bodies are independent organisations recognized to issue RecyClass Certifications according to the methodologies of RecyClass. Certification Bodies signed a Partnership Agreement with RecyClass, and its auditors attended the RecyClass Auditors Recognition Course<sup>2</sup>.

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 chair. Certification Bodies do not pay a membership fee. Requirements to join can be found in the document *Requirements for Certification Bodies and Auditors* for the corresponding Audit Scheme.

The Certification Bodies group is established to:

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

## 2.11 RECYCLASS TEAM

RecyClass Team staff is appointed to manage RecyClass on a daily basis and perform various administration tasks, communication, website, meetings organization and NDA management. Additionally, RecyClass Team also acts as an entry point for RecyClass users and Applicants of an assessment process.

### 2.11.1 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 RecyClass.

### 2.11.2 NDA MANAGEMENT

- Arrange and manage the content and signature of the NDA between Recyclers, Members or Supporters and RecyClass required to participate to TCs, TFs or WGs.
- 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 in the document *RecyClass Recyclability Approval – Quality Management and Procedures*.
- Make sure that all NDAs are set in place.

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<sup>2</sup> More information in the document '*Certification Bodies and Auditors Requirements*'.

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## 2.11.3 DOCUMENTS & ONLINE-TOOL UPDATE

- Provide support to all RecyClass working groups 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.
- Keep track of TCs decisions and guidelines updates in a decision log.
- Update the RecyClass Online-Tool based on the decision of the TCs.
- Maintain and update the certification schemes documentation.

The change management process of the recyclability requirements related to the Design for Recycling Guidelines, Online-Tool and Recyclability Certification is defined in Annex I.

## 2.11.4 MEETINGS ORGANIZATION

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

## 2.11.5 CONTACT ENTRY POINT FOR RECYCLABILITY APPROVALS

- Ensure effective communication between the Applicant, TC and SB.
- Receive evaluation requests from potential Applicants, assess whether they fall within the scope of the Recyclability Evaluation Protocols, the Recyclability or Recycled Plastic Certifications, or the Letter of Compatibility and guide the Applicant in the application form submission.
- In the case of Recyclability 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 Recyclability 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. MEMBERSHIP

### 3.1 ADMISSION PROCEDURE OF MEMBERS/SUPPORTERS

The admission of new Members or Supporters is subject to the following conditions:

- A written application must be sent to the registered office of the initiative.
- The application for entry will be submitted to the RecyClass SB for approval and must be accepted by an affirmative vote of the majority of the SB members. Candidates whose candidacy is not approved, have the right to submit their comments in writing to the RecyClass SB, that must review them and give a written response.

### 3.2 RESIGNATION OF MEMBERSHIP

A Member has the right to resign the Membership at any time.

Resignation of Membership must be in writing and sent by registered mail to the registered office of the RecyClass initiative at least six months before the year end of the current Membership. The resignation of a RecyClass Member only becomes effective on 31 December of the current year. If a resignation is notified less than six months before this date, the Membership can only cease at the end of the following year.

### 3.3 EXCLUSION OF MEMBERS/SUPPORTERS

In any of the following cases, a Member/Supporter can be removed from RecyClass by the SB by following the procedures hereafter:

- The Member does not respect the obligation concerning the payment of Membership fee;
- The Member/Supporter does not respect or follow the Internal Procedures or any other rule established by RecyClass and intended for all Members/Supporters of RecyClass;
- The Member/Supporter does not respect EU Competition law.

The exclusion procedure is the following one:

- 1) The RecyClass SB proposes the exclusion of a Member during a SB Meeting.
- 2) Before starting the exclusion procedure; the RecyClass SB must inform the Member/Supporter about its intention. The affected Member/Supporter has the right to be heard about their situation by the RecyClass SB and before the exclusion proposal is discussed by the SB.
- 3) The RecyClass SB will vote on the exclusion of the Member/Supporter, with an affirmative vote of a 2/3 majority of the SB Members. The decision of the SB must be justified.

In the case where a Member does not respect the payment obligations related to his Membership fee, the RecyClass SB has the right to cancel all rights of the Member in RecyClass, pending discussion about the Member's situation and the possible exclusion of the Member from RecyClass at the next the TC or AB meeting as mentioned in the exclusion procedure.

## 4. ASSESSMENT PROCESSES

### 4.1 RECYCLABILITY

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## 4.1.1 RECYCLASS TEST CAMPAIGNS

RecyClass is regularly conducting test campaigns under the validation by TCs or TFs. These test campaigns aim to evaluate specific plastic packaging technology or innovation categories to generate scientific-based data to further provide guidance towards their recyclability. Methodology, samples, and analyses of the results are managed by the corresponding TCs or TFs that coordinated the campaign. Members, supporters as well as external stakeholders can be part of the test campaign by either providing samples, internal studies, or expertise. These test campaigns can be totally or partially funded by RecyClass, or a part of the industry. Timelines and goals are defined at the beginning of each new test campaign and shall be respected. In case of delay, e.g. for sample preparation, sample shipment, laboratory test, or data to be provided, RecyClass Team as well as the RecyClass SB and TCs /TFs coordinating the test campaign must be informed as soon as possible. Outcomes of test campaigns are then used to update the Design for Recycling Guidelines, to develop new testing protocols or to provide new guidance to the industry through technical reviews.

## 4.1.2 RECYCLABILITY 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 concerning 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.

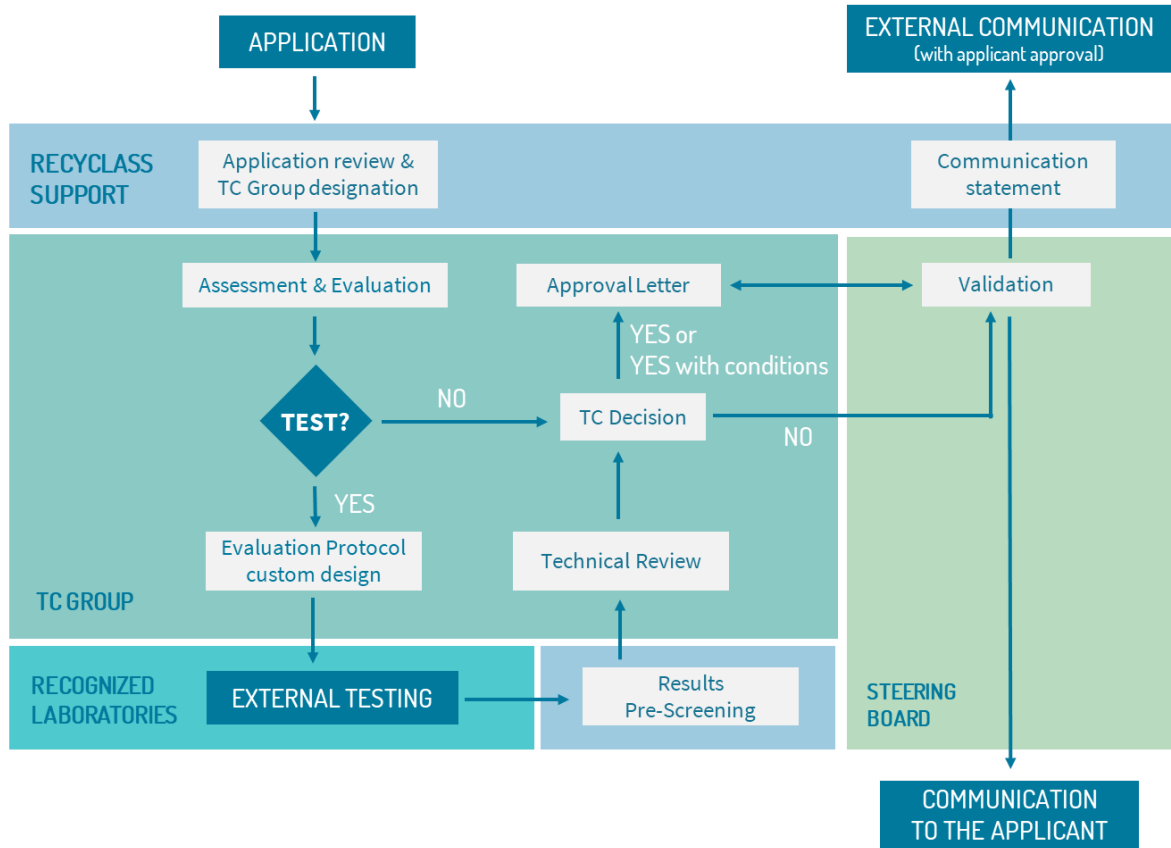
The Recyclability Evaluation Protocols will promote recyclability by encouraging industry to test new plastic technologies, materials or product before market launch as well as giving advice and recommendations to Applicants. The general approval scheme is presented in Figure 2, while a more detailed explanation of the process steps is provided in the RecyClass Recyclability Approval Quality Management & Procedures document<sup>3</sup>.

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

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<sup>3</sup> RecyClass Recyclability Approval Quality Management & Procedures

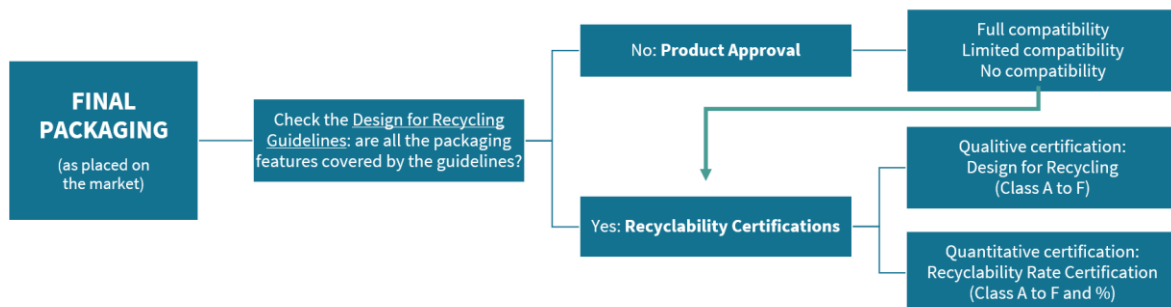
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## 4.1.3 RECYCLABILITY CERTIFICATIONS

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



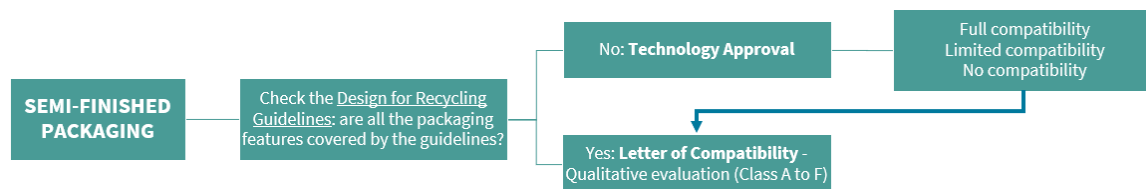
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RecyClass Recyclability Certifications offer reliable assessments of the recyclability of a packaging design on the RecyClass Design for Recycling Guidelines<sup>4</sup> and the RecyClass Recyclability Methodology<sup>5</sup>. The procedures of the scheme are detailed in the RecyClass Recyclability Certification Quality Management & Procedures document<sup>6</sup>.

## 4.1.4 LETTER OF COMPATIBILITY

Semi-finished packaging can also be evaluated according to the RecyClass Recyclability Methodology<sup>7</sup> and the RecyClass Design for Recycling Guidelines<sup>8</sup> 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 for Business-to-Business communications only.

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



## 4.2 RECYCLED PLASTICS

### 4.2.1 RECYCLING PROCESS CERTIFICATION

The RecyClass Recycling Process Certification recognises plastic recycling processes for pre- and post-consumer waste operating at a site. Certification against this Audit Scheme<sup>9</sup> allows recyclers to demonstrate their contribution to the waste management of plastics and transparently communicate the origin of the waste. Certification focuses on the verification of the origin of waste, the traceability throughout Recycling Process and the calculation of recycled content in the output.

The Certification is granted based on the Audit Scheme requirements, and it is governed via the procedures described in the Certification Quality Management and Processes<sup>10</sup>. The Audit Scheme covers requirements to be met by organisations concerning traceability according to EN 15343:2007, quality management and environmental and

<sup>4</sup> <https://recyclclass.eu/recyclclass/design-for-recycling-guidelines/>

<sup>5</sup> <https://recyclclass.eu/recyclclass/methodology/>

<sup>6</sup> *RecyClass Recyclability Certification Quality Management & Procedures*

<sup>7</sup> <https://recyclclass.eu/recyclclass/methodology/>

<sup>8</sup> <https://recyclclass.eu/recyclclass/design-for-recycling-guidelines/>

<sup>9</sup> *RecyClass Recycling Process Audit Scheme*

<sup>10</sup> *RecyClass Recycling Process Certification Quality Management and Procedures*

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administrative operating performance for the recycling of waste, as well as segregation and controlled blending chain of custody models as described in ISO 22095:2020.

Additionally, the Audit Scheme can be complemented with add on Modules (Module A: Food Contact<sup>11</sup>, Module B: Cosmetics and Household Care Applications<sup>12</sup>, Module C: Corporate Social Responsibility<sup>13</sup>). The Scheme is based on the international standard on chain of custody (ISO 22095), as well as the European standard on recycled plastics traceability (EN 15343:2007).

## 4.2.2 RECYCLED PLASTICS TRACEABILITY CERTIFICATION

The Recycled Plastics Traceability Certification recognises 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 was created to harmonize the approach towards assessment of the recycled content of plastic products for companies making environmental claims.

The Certification is granted based on the Audit Scheme requirements<sup>14</sup>, and it is governed via the procedures described in the Certification Quality Management and Procedures<sup>15</sup>. The Audit Scheme assesses 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).

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<sup>11</sup> *RecyClass Recycling processy Certification Audit Scheme Module A: Food contact*

<sup>12</sup> *RecyClass Recycling Process Audit Scheme Module B: Cosmetics & Household Care Applications*

<sup>13</sup> *RecyClass Recycling Process Audit Scheme Module C: Corporate Social Responsibility*

<sup>14</sup> *RecyClass Recycled Plastics Traceability Audit Scheme*

<sup>15</sup> *RecyClass Recycled Plastics Traceability Quality Management & Procedures*

## ANNEX I – CHANGE MANAGEMENT PROCESS OF THE RECYCLABILITY REQUIREMENTS

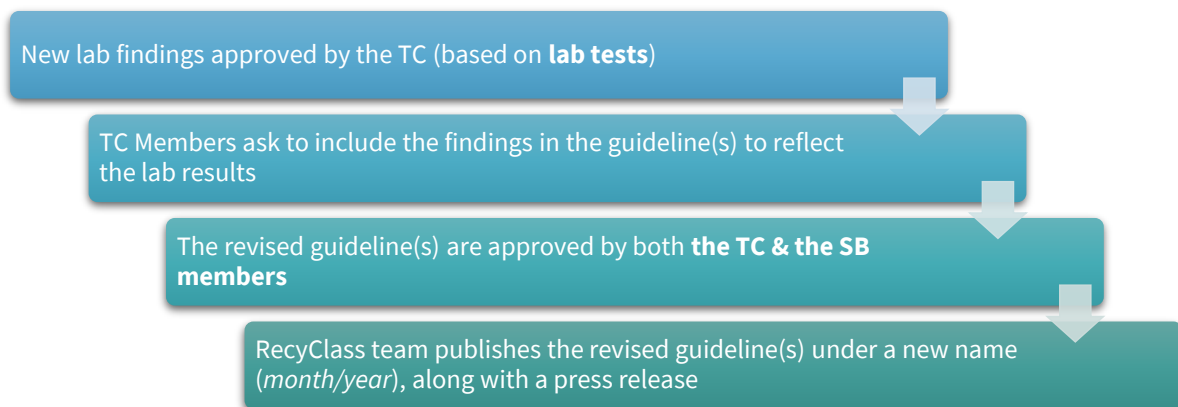
This annex lays out rules and procedures to the Change Management Process, that apply for the Design for Recycling Guidelines, the Online-Tool, and the Recyclability Certification. This process must be strictly followed by all involved actors, that includes Technical Committees members, Steering Board members, the recognized Certification Bodies, and the RecyClass Team.

### DESIGN FOR RECYCLING GUIDELINES

The RecyClass Design for Recycling Guidelines are living documents, updated on a regular basis according to new lab tests and findings managed by the Technical Committees. The members of these committees are responsible for developing their respective guidelines as reported in section 2.3. RecyClass intends to limit the number of updates to two revisions of the guidelines per year.

Figure 5 represents the main steps of the change management process for updating a Design for Recycling Guideline.

*Figure 5: Change Management Process Overview – Design for Recycling Guidelines*



### NEW LAB FINDINGS EVALUATION

The evaluation of laboratory tests follows the procedures defined in the document “Recyclability Approval – Quality Management and Procedures”<sup>16</sup>. The TC members are responsible for the review of the laboratory evaluation report, within the timeframe and rules defined by the procedures.

### PROPOSING GUIDELINES UPDATES

After evaluating the laboratory results, TC members may request to revise the Design for Recycling Guideline(s) to reflect the new laboratory findings. RecyClass Team is responsible for drafting a proposal for updated guidelines based on the TC decision.

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<sup>16</sup> *Recyclability Approval – Quality Management and Procedures*



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RecyClass Team circulates the proposal among all TC members to collect feedback. The revised guideline(s) can be shared internally inside member companies to consult additional experts. This revision lasts at least two weeks.

After the first round of comments, and if necessary, RecyClass Team adjusts the proposal according to the received feedback. In case of additional modifications, RecyClass Team circulates the guideline(s) for a last verification. One additional week is granted to the TC members to raise any comments.

## APPROVAL OF NEW DFR GUIDELINES

Revised DfR guidelines must be approved by both the TC and the SB, in the consecutive order. The guideline(s) is considered approved by the TC if no comment is received by the members within the given period and as defined in the previous section.

Upon the validation of the TC representatives, the proposal is submitted by RecyClass Team to the SB for final approval.

## RELEASE OF NEW DFR GUIDELINE

RecyClass Team drafts a press release to report the changes of the new guideline(s) and the rationale behind the update. The press release is shared with the SB members for approval.

Once the press release is approved by the SB, RecyClass Team publishes the new guideline(s) on the RecyClass website<sup>17</sup> under a new name corresponding to the current month and year (*month/year*), along with the associated press release<sup>18</sup> that is sent as well to the entire RecyClass network via email (i.e., RecyClass members, Online-tool users, and any other stakeholders willing to receive RecyClass news). Other external communications can be planned.

Any change on the guideline(s) must be linked to relevant and technical documentation, that explain the tests performed and the results (e.g., hyperlinks to the corresponding approval letters).

## ONLINE-TOOL

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 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 users. In any case, RecyClass Online Tool should not be used to claim the 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 or the development of collection, sorting and recycling of plastics in Europe. Depending on the nature of the update, a specific approval process must be followed by the RecyClass Team.

Figure 6 represents the main steps of the change management process for updating the RecyClass Online-Tool.

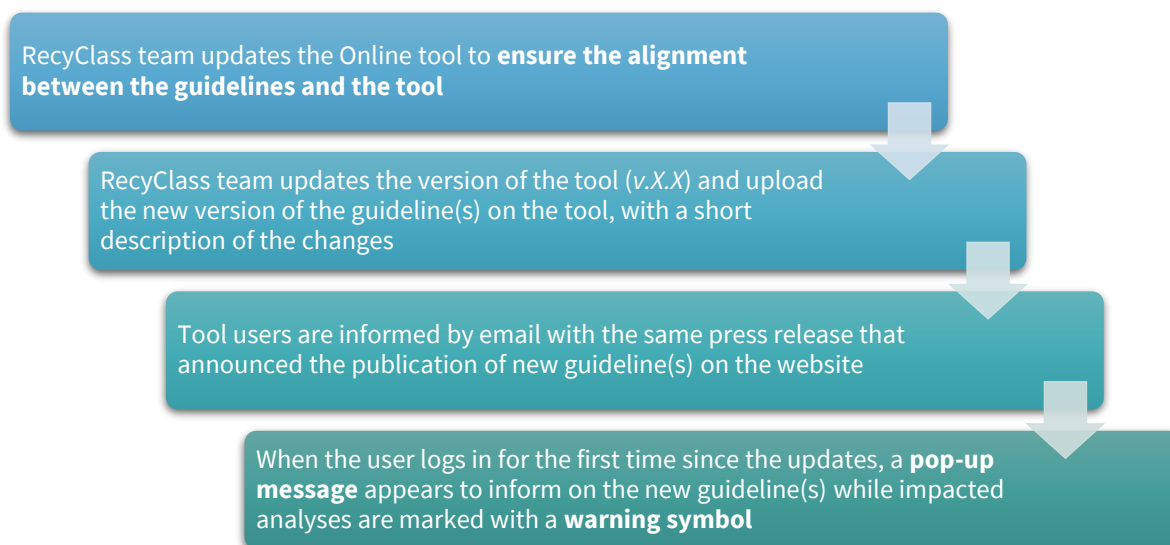
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<sup>17</sup> *RecyClass Design for Recycling Guidelines*

<sup>18</sup> *RecyClass News*

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Figure 6: Change Management Process Overview – Online Tool



## UPDATE OF THE TOOL IN LINE WITH NEW GUIDELINES

In parallel with the publication of the new version(s) of Design for Recycling Guidelines, the RecyClass Team updates the Online-Tool (e.g., implementation of new features, modification of the scoring for existing features). Alignment between the Guidelines and the Tool must continuously be ensured.

## TOOL VERSIONING & UPDATES TRACKING

The updates to the Online-Tool are tracked via a changelog and software versions. Old and current versions of the guidelines are stored on the *Versions* webpage of the Online-Tool, that is available to all users willing to access and compare the various updates. RecyClass Team is responsible to store all versions and to update the tool versioning accordingly.

Any modification of the tool leads to a new version (v.X.Y.Z) generated after the update and is described in the changelog available for all users ([Versions](#) webpage). Any update linked to the modification of the guideline(s) impacts the second number of the version, as it may impact the recyclability results. The versioning rules are defined as reported in Table 1, and as well as the necessary approval(s) to proceed with each update.

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 potentially impacting the recyclability results	Approval required by the corresponding TC and by the SB

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Version X.Y.Z	Editorial modification(s) not impacting the recyclability evaluation (e.g., updating of help boxes, mapping information, etc.)	No approval required. Managed by the RecyClass Team to facilitate the users experience
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The version of the Tool is reported as well on each PDF report generated after having completed an analysis. Additionally, a page dedicated to the versioning should explain the update corresponding to the new version.

Moreover, RecyClass Team maintains up to date a table with the foreseen updates, based on the ongoing work and discussions within the RecyClass working groups<sup>19</sup>. This table is available for all Tool users and aims to inform them of a possible evolution to some features, as illustrated below.

Table 2: Foreseen guidelines and tool updates

Features under investigation	Investigation purposes	Foreseen updates	Timeline
Printing inks (direct printing) for polyolefin rigid and flexible packaging	Understand the impact of different ink binders (PU, NC) and the amount of inks (wt%)	Possible limitation for some inks binders Move from surface coverage to printing amount (flexible guidelines)	End of 2021
Metallisation for flexible packaging	Understand the impact of vacuum deposited metallisation on PE and PP flexible streams	New classification of metallisation for the flexible guidelines	End of 2021
...	...	...	...






## COMMUNICATION TO USERS

As previously reported, a communication is sent to the RecyClass network – that includes the Tool users – informing about the publication of new Guideline(s).

When the user logs in for the first time since the updates, a pop-up message appears to inform on the new Guideline(s) and listing all changes. This message is stored with its corresponding Guideline(s) in the *Versions* webpage of the tool and can be found at any time by the users.

Moreover, at each connection the Online-Tool re-calculates all completed analyses of the users to verify if the scoring has been impacted by possible updates. As illustrated below, a warning symbol appears in front of analyses affected by the updates, and that may lead to a different scoring. The user is thus invited to duplicate the completed analysis to re-run the self-assessment with the new tool version.

Picture 1: Illustration of the warning symbol for an analysis impacted by updates

2021-05-26 07:33:20	 test		  
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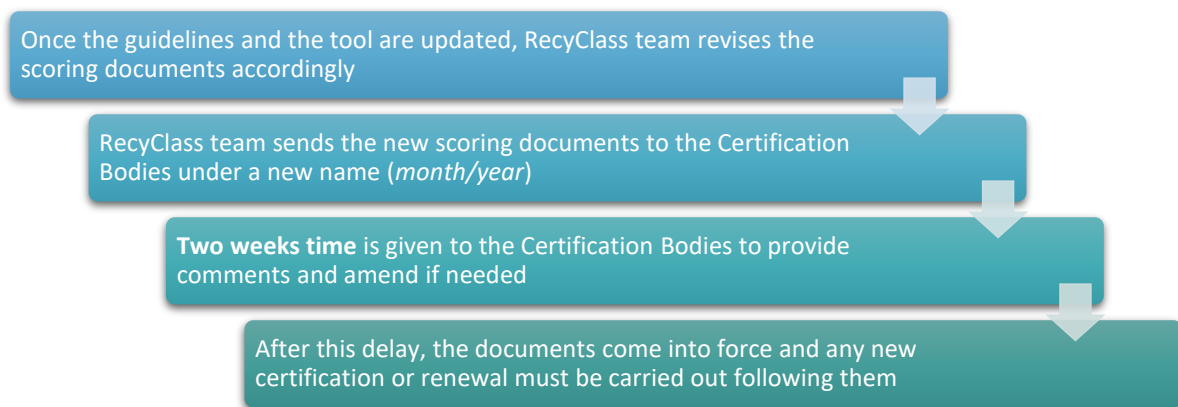
<sup>19</sup> RecyClass Workplan and foreseen updates accessible here: <https://recyclass.eu/tool/recyclass-workplan/>

## METHODOLOGY OF THE RECYCLABILITY CERTIFICATION

The scoring of the Recyclability Certification is based on the Design for Recycling Guidelines and is aligned with the self-assessment results provided by the Online-Tool. The change management process of the scoring documents for auditors is defined in the RecyClass Recyclability Certifications – Quality Management and Procedures<sup>20</sup> document.

Figure 7 represents the main steps of the change management process for updating the scoring of the Certification Scheme.

Figure 7: Change Management Process Overview – Certification Scheme



## AUDIT DOCUMENTS REVISION

Based on the updated Guideline(s), RecyClass Team updates the document *Auditors guidelines & scoring tables* with the new lab findings. The revised document is sent to all auditors under a new name (*month/year*) for revision. Auditors are invited to provide comments within two weeks. If any amendment is required RecyClass Team modifies the document and re-circulates it to all auditors for two additional weeks. Without comments, the revised document is considered approved.

## AUDIT DOCUMENTS IMPLEMENTATION

Once the document *Auditors guidelines & scoring tables* is approved by all auditors, the document comes into force and any new certification or renewal must be carried out in accordance with it.

Any certification carried out with a previous versions of the *Auditors guidelines & scoring tables* remains legitimate. The certificates are valid for three years, after which they will have to be renewed according to the new Guidelines and scoring tables. Terms of use and validity of the certificates are defined in the Quality Management and Procedures document.

However, the Certification Bodies are invited to notify to the certified companies of any possible changes that may impact the scoring of their packaging.

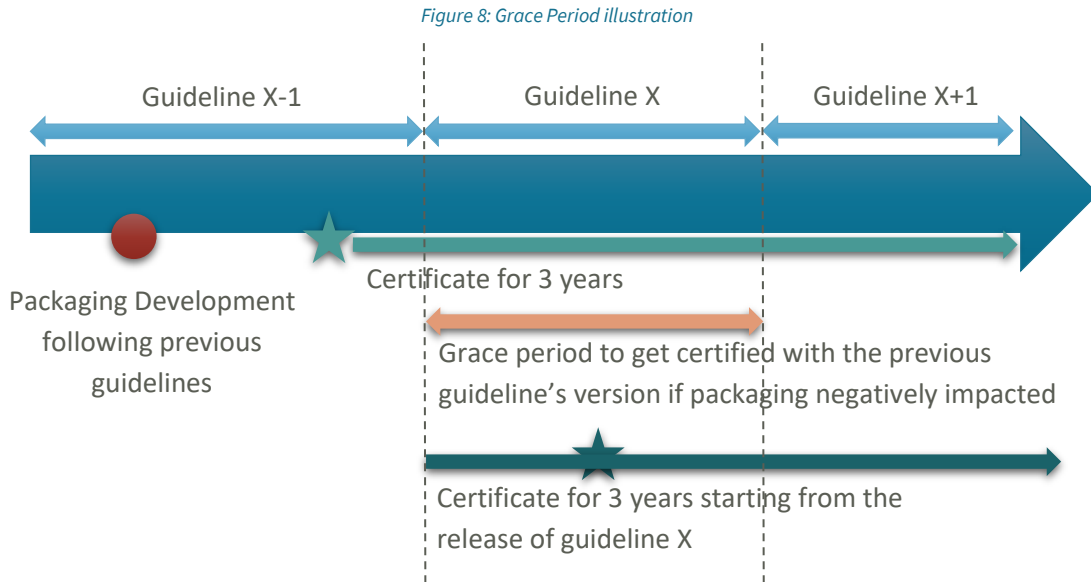
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<sup>20</sup> RecyClass Recyclability Certifications – Quality Management and Procedures

# RecyClass

## GRACE PERIOD

As the development of new packaging takes longer than the lifespan of a Guideline, a grace period can be granted if a company would like to receive a certification for a packaging negatively impacted by a recent Guideline's update. Figure 8 illustrates the process of the grace period.



The grace period allows the Certification Bodies to certify plastic packaging with the previous version – and only the previous version – of the Auditors Guidelines & Scoring Tables document (i.e., to certify packaging according to the guideline X-1). However, the three-years validity of the certificate starts from the release of the Guideline X, independently of the audit date.

RecyClass Team and the Certification Bodies must keep active the versions X and X-1 of the Auditors Guidelines & Scoring tables document. Once the Guideline X+1 and its corresponding Auditors Guidelines & Scoring tables document enter into force, the version X-1 can be archived, and the packaging can no longer be certified following it.

This grace period is however limited to one year. After this, the version X-1 of the Auditors Guidelines & Scoring Tables document is archived. Only the current version X of the auditors document is active, and all packaging must be certified according to its requirements.

## ANNEX II – CONTROL TABLE OF CHANGES

<b>Version</b>	<b>Date</b>	<b>Section</b>	<b>Update description</b>
3.2	January 2024	2.1 to 2.4 4.1.1	Addition of procedure for replacement of a representative  Addition of a section dedicated to RecyClass Test Campaigns  Addition of machine manufacturers/technology providers as members
3.1	June 2023	2.6 & 2.7	Addition of Roles & Tasks of Members & Recyclers
3.1	June 2023	All doc.	Update the name of linked documents and editorial changes to the text
3.1	June 2023	2.11.2	Addition of tasks about NDAs
3.0	August 2022	2.0	Update the RecyClass structure and organisation
3.0	August 2022	3.2	Addition of the RecyClass Recycling Process Certification
3.0	August 2022	2.6	Laboratories replaced by Testing Facilities
2.4	January 2022	2.6 & 2.7	Accredited Laboratories & Certification Bodies renamed as Recognized
2.3	December 2021	2.1	Clarification for the minutes
2.3	December 2021	2.2	Clarification for the minutes and the role of AB chair
2.3	December 2021	2.3	Clarification for the minutes
2.3	December 2021	2.9.3	Wording clarification
2.3	December 2021	3.	Section on the online tool's update removed
2.3	December 2021	4.1.1 (ex-3.1.1)	Figure 2 revised
2.3	December 2021	Annex I	New annex defining the change management process for the guidelines, tool and certification

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