

RecyClass

CERTIFICATION BODIES & AUDITORS REQUIREMENTS

RECYCLING PROCESS CERTIFICATION

RECYCLED PLASTICS

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1. INTRODUCTION

This document lays down requirements, qualifications and conditions for Certification Bodies and recognized auditors of the RecyClass Recycling Process Certification.

This document provides requirements to guarantee that RecyClass audits are conducted in a consistent and impartial manner by Certification Bodies and their auditors, safeguarding the integrity of the RecyClass Certification Schemes.

Audits are conducted by competent auditors within recognized Certification Bodies, who issues the third-party conformity assessments and issue the final certificate for RecyClass.

2. RECOGNITION OF CERTIFICATION BODIES

2.1 PROCEDURE

- 1) Applicant Certification Bodies submit their application request to the RecyClass via email to info@recyclclass.eu.
- 2) RecyClass evaluates each Certification Body according to the requirements set forth in this document.
- 3) Upon acceptance of its application request, the Certification Body receives a template of the Cooperation Agreement with RecyClass that both parties shall sign.
- 4) RecyClass will evaluate the compliance with the requirements set forth in this document prior to the official recognition. Certification Body's auditors must attend and pass the Auditors Training Course to become recognised auditors before issuing any certificate.
- 5) The recognition of the Certification Bodies and 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 website.
- 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 Recycling Process Certification audits is available on the website.

3. CERTIFICATION BODIES APPLICATION REQUIREMENTS

Certification Bodies must comply with the following requirements:

- Certification Bodies must be legal entities or defined as part of a legal entity;
- Be registered in the EU27+3 (European Union Member States, Norway, Switzerland and the United Kingdom);
- Be accredited for the relevant European standard on the basis of ISO/IEC 17065 by a signatory of the EA-MLA; or alternatively IAF;
- Have operation experience in certification of plastics recycling;
- Be competent organisations with demonstrated references in the field of plastics and traceability.
- Have mechanisms in place to ensure impartiality of the organisation and its auditors during the performance of their activities.
- Have financial stability and must dispose of insurance or reserves to cover any liabilities arising from its operations.

3.1 CERTIFICATION BODIES OPERATION REQUIREMENTS & RESPONSABILITIES

- Certification Bodies must be recognised by RecyClass; this procedure is official upon the signature of the Cooperation Agreement between both parties.
- Confidentiality between RecyClass and Certification Bodies where applicable must be guaranteed with the signature of a Non-Disclosure Agreement.
- 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 who must be recognised by RecyClass. Certification Bodies must maintain updated records of education, training, and experience of all recognised auditors, which must be employed or under contract with the Certification Body.
- Technical reviewers must be employed or under contract with the Certification Body. Technical reviewers must be recognised RecyClass auditors and must be based in the EU27+3.
- In case of newly recognised auditors who are based outside of the EU27+3, a witness audit from an auditor based in EU27+3 will be mandatory during the first on-site audit to ensure compliance with audit requirements. Certification Bodies must guarantee the same level of performance from non-EU auditors.
- Certification Bodies and its auditors should attend the RecyClass Auditors Workshops organised annually where any new requirements or recent developments related to the Certifications are discussed. At least one representative of each Certification Body must attend all Workshops. The Certification Body's representative must collect feedback and act in representation of all the other recognised auditors of the Certification Body. All recognised auditors are required to recover the information of previous Workshops and stay up to date to the latest Audit Scheme developments.
- In the case of an inactive auditor, when certificates have not been issued for more than a year, RecyClass will evaluate the auditor's competence and, if necessary, request the auditor's participation in a RecyClass Auditors Training Course.
- 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 "Recycling Process Certification. 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 Recycling Process Audit Scheme and corresponding modules" and any other relevant documents. Certification Bodies must maintain an active correspondence with RecyClass before and during the audit of a process and its recycled output to request a site code, a third-party code and share the final certificate.

- Certification Bodies must properly record all issued RecyClass Recycling Process Certifications and store internally the Audit Report, and any relevant related documentation for the duration of 5 years following the certificate's date of issue.
- Certification Bodies remain responsible for their issued certificates until their expiration; termination by the Applicant; or withdrawal 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.
- 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.

4. AUDITORS REQUIREMENTS AND QUALIFICATION

In order to ensure a consistently high standard of issued certificates, auditors must meet the requirements listed below. Furthermore, all auditors must have attended and passed the final exam for RecyClass Auditors Training for Recycled Content Traceability.

4.1 TECHNICAL REQUIREMENTS

A recognised auditor under a Certification Body must comply with the following requirements:

- Technical knowledge about plastics recycling;
- Technical knowledge about traceability of recycled plastics as described in EN 15343:2007 Plastics - Recycled Plastics – Plastics recycling traceability, conformity assessment and calculation of recycled content;
- Good understanding of the controlled blending chain of custody model as described in ISO 22095 Chain of Custody – General terminology and models;
- Above average theoretical knowledge, practical skills and the ability to carry out an on-site audit.

Competence should be demonstrated 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).

In case of Certification Bodies that would like to issue certificates for recyclers of German packaging waste (Annex: Additional Requirements for German Waste), auditors must be registered in the German Central Agency Packaging Register – ZSVR (Zentrale Stelle Verpackungsregister) who indicate to the ZSVR their intention to conduct the audits

provided by the Verpackungsgesetz (Packaging Act). The register is published online and it is available in [the following link¹](#).

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 Recycling Process 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 three 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.

RecyClass will inform the relevant National Accreditation Body of a decision of termination of the Cooperation Agreement between RecyClass and a recognised Certification Body.

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.

¹ German Packaging Act, available at [Verpackungsgesetz \(Packaging Act\) \(verpackungsregister.org\)](#)

7. FREE COMPETITION AMONG CERTIFICATION BODIES

Companies who request a RecyClass Recycling Process 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 personally, voluntary agrees to implement the following Code of Conduct Agreement to govern the future conduct in connection with the RecyClass Recycling Process Certification:

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 duties.
- 2 Conduct itself professionally, with truth, accuracy, fairness and responsibility.
- 3 Not misrepresent his qualifications, competence or experience.
- 4 Nor undertake assignments beyond his capabilities.
- 5 Treat in a Confidential manner all Confidential Information, unless authorised in writing to disclose such information by the company.
- 6 'Confidential Information' shall mean any and all information provided to the Auditor for the purposes of his assignment for RecyClass and the Audited Company, except for information which it can be shown by the Auditor, that is:
 - a. already or hereafter becomes part of the public domain by publication or otherwise than through the breach of this agreement by the Auditor, or
 - b. already in the possession of the Auditor prior to the receipt of the information from RecyClass or the Audited Company as public information, or
 - c. lawfully acquired by the Auditor after the time of disclosure hereunder from a third party with full rights of disclosure.
- 7 Will not disclose any details of audit findings outside of the organisation, neither during nor after the audit process.
- 8 Not intentionally communicate false or misleading information which may compromise the integrity of the certification processes.
- 9 Be able to act professionally under adverse pressure from companies being audited.
- 10 Inform RecyClass about any change in his employment position.
- 11 Report to RecyClass any new, updated or withdrawn audit.
- 12 Use the reference codes provided by RecyClass in order to issue a Certificate and Audit Report.
- 13 Implement all third-party auditor recommendations.

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Conflicts of Interest

The Auditor will perform his duties conscientiously, honestly, and in accordance with the best interests of RecyClass. The Auditor must not use his positions, or the knowledge gained as a result of their positions for direct or indirect personal advantage. Regardless of the circumstances, if the Auditor senses that a course of action he has pursued or he 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 “Requirements for Certification Bodies and auditors” is the accepted practices that surround the accredited auditor. Violations of these are considered to be serious in nature and will result in swift intervention by RecyClass according to section 6 of the document “Requirements for Certification Bodies and auditors”.

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. Such situations 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.

General

The obligations and commitments mentioned in this document bind the Auditor personally, independently of his position as an appointee (employee, self-employed or otherwise) representing a company.

The non-disclosure obligations contained in this document do not end when the Auditor would lose his capacity of Auditor or when the agreement in general would be terminated in any way whatsoever.

For RecyClass:

The auditor:

Signature:

Signature:

Name:

Name:

Address:

Address:

Date:

Date:

9. ANNEX II: TABLE OF CHANGES

Version	Date	Section	Update description
1.2	September 2024	2.1	Addition of a contact email.
1.2	September 2024	3	Wording clarification.
1.2	September 2024	3.1	Review of the requirements for technical reviewers and auditors based outside the EU. Clarification about the participation to Auditor workshops and record keeping.
1.2	September 2024	4.1	Clarification and addition of a link to the Zentrale Stelle Register of recognised auditors.

Version	Date	Section	Update description
1.1	June 2023	3, 3.1	Clarifications on accreditation requirements.
1.1	June 2023	6	Clarifications on the procedure to inform NAB in case of termination of the Cooperation Agreement.
1.1	June 2023	5, 7, 8	Clarification on the wording “RecyClass Recycling Process Certification”.

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