

RecyClass

QUALITY MANAGEMENT & PROCEDURES

RECYCLING PROCESS CERTIFICATION

RECYCLED PLASTICS

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1. INTRODUCTION

This document lays out quality management systems for the development and maintenance of the RecyClass Recycling Process Certification and describes the procedure to apply for and obtain Certification.

The Certification offers a reliable third-party audit of the plastics recycling process traceability during the recycling of waste into a recycled output. Certification also attests the share of recycled content in recycled outputs and the origin, source, and type of the waste.

2. CERTIFICATION DEVELOPMENT AND MAINTENANCE

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

RecyClass regularly review all available documentation including the Audit Scheme, Modules, Auditor Guidance and Audit Checklist, Audit Report templates, Certificates and Quality Management and Procedures according to available information and current practices within the industry and regulation to ensure quality of the recycling process and the traceability of recycled content in plastics. Changes and updates are discussed within the Recycled Plastics Taskforce and implemented by the RecyClass Steering Board which is composed by representatives of RecyClass as laid out in the document “RecyClass Internal Procedures”.

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

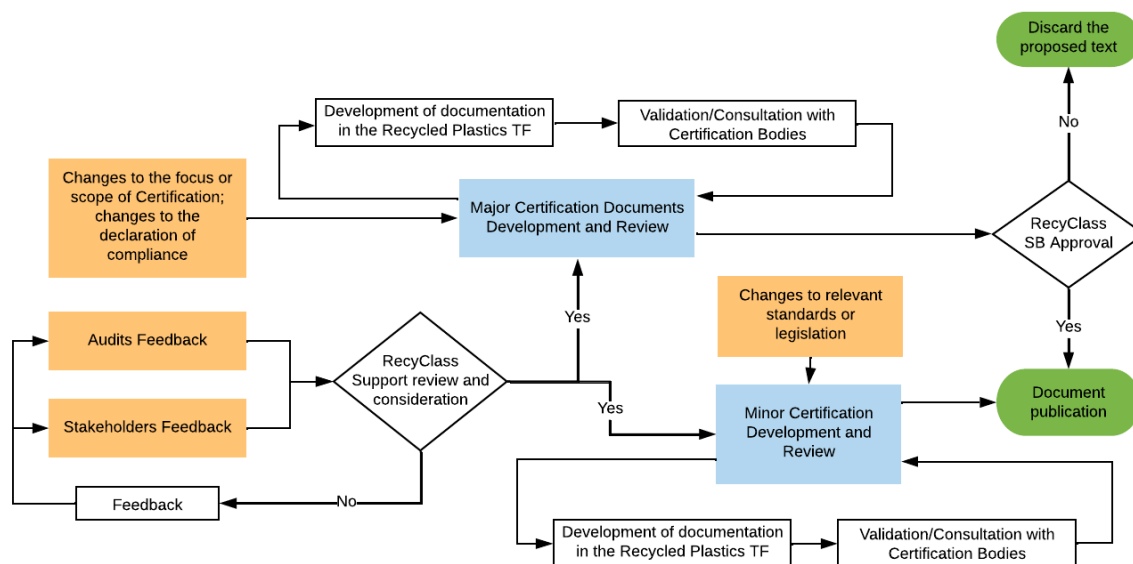
- Changes to relevant European standards (e.g., EN 15343) or relevant legislation (e.g., Waste Framework Directive) under the focus and scope of the Certification. Changes in standardisation or relevant legislation must be updated into the Certification documentation.
- Changes in the focus or/and scope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

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

Suitable feedback is included in the respective documentation during the review. The review of documentation takes place in the Recycled Plastics Taskforce in consultation with Certification Bodies to ensure the suitability and fitness of the added requirements or procedures. The RecyClass SB approves the final version of the documents for publication.

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

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



Documentation development and review is structured as follows:

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

2.1 SYSTEMATIC REVIEW

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

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

2.2 COMMUNICATION OF CHANGES

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

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

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

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

3. USE OF OFFICIAL DOCUMENTATION

RecyClass Recycling Process Certification documentation is published in English on the RecyClass website. Certification Bodies must use official RecyClass document templates to procure the Audit Report, Certificate and additional documentation to the applicant in English.

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

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

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

4. CERTIFICATION BODIES

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

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

Communication between Certification Bodies and RecyClass must be kept at a regular basis. Certification Bodies must communicate to RecyClass any new applications for Certification. RecyClass will provide a unique certification code for registration. Certification Bodies must communicate to RecyClass the organisation of the on-site audits and Certification decision of initial audits, provisional audits and monitoring audits.

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

5. ACCREDITATION BODIES

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

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

6. DATA CONFIDENTIALITY

Confidential information shared between the applicant and the Certification Body during the auditing process must be protected by the signatory of a Non-Disclosure Agreement between both parties. The NDA must also cover the information shared in the application form.

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

7. CERTIFICATES QUALITY CONTROL

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

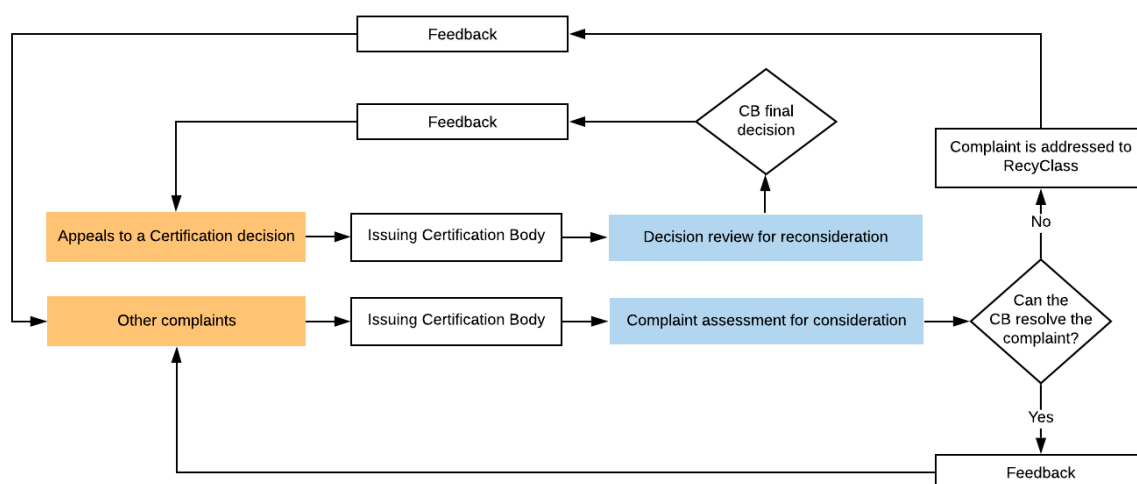
A RecyClass expert will select several audit reports annually for a sample check. The review of the Audit Reports is made anonymously using a third-party code to preserve the confidentiality of the applicant.

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

8. COMPLAINTS AND APPEALS

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

Figure 2. Complaints and appeals procedure



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

8.1 COMPLAINTS AND APPEALS TO RECYCLASS

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

9. ELEGIBILITY TO APPLY FOR A CERTIFICATION

Certification may only be granted to *Recyclers* with plastics *Recycling Processes* in place capable of recycling pre-consumer and/or post-consumer plastic waste.

Recyclers must have a *Recycling Process/es* in place in possession of a waste management permit, a permit derogation according to Article 20 of the Waste Framework Directive, or an operating license or environmental license with specific provisions on treatment of waste. In case of Module A Food Contact, section A2, Organisations may only operate a decontamination process and are exempt of having a waste permit in place.

10. CERTIFICATION PROCEDURE

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

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

The Certification Body and Applicant will start the auditing procedure with the signature of the Certification Agreement and a Non-Disclosure Agreement.

The Certification Body will provide a list of all information that the Applicant must make available to the auditor prior the agreed audit date that will allow a successful on-site audit.

The Certification Body will provide a list of requested documentation to the applicant necessary to conduct the documentation review. The list will be provided by the Certification Body.

The Certification Body will conduct the documentation review to evaluate the information and documentation provided and determine to which extend the applicant fulfils the audit requirements and fitness for the on-site audit. The Certification Body may ask for additional documentation or information to better understand the *Recycling Process/es* and the *Organization*.

Once the documentation review is completed, the Certification Body will perform an on-site audit to inspect the *Recycling Process/es* on location. Certification Body will perform a traceability check of recycled plastics and a reconciliation of volumes to verify that output corresponds to the recycled input used, considering losses or additives added. The Certification Body will also verify the veracity and accuracy of the provided documentation.

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

10.1 AUDIT OUTCOME

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

- Draft Report (electronic copy): Issued no later than 4 weeks after the audit date. The applicant will dispose of 2 weeks to make comments.
- Audit draft Report: Sent by the Certification Body as an anonymous report to the quality controller for quality review (if applicable).
- Audit Report (secured electronic copy): The Certification Body will issue the final Audit Report within 6 weeks after the audit date.
- Certificate: The Certification Body will provide the final certificate signed by the recognised auditor. An Annex will include a list of the products or families of products included in the Certification. The Certificate will be shared with RecyClass who will update this information to the RecyClass website.

The details of the information exchange between the Applicant and the Certification body are described in section 10.2.

10.2 DETAILED PROCEDURE

Procedure	Documentation	Participants
<p><u>Introduction & Application for Certification</u></p> <p>Certification Body provides the applicant with necessary information to understand the procedures, purpose of the audit and Audit Scheme requirements. Certification Body organises a meeting with the applicant to ensure the right understanding and create mutual trust between parties.</p> <p>The applicant submits an application for Certification to the Certification Body. The Certification Body might request additional information for clarification.</p>	<p>Quality Management & Procedures, Audit Scheme, Application Form</p>	<p>Certification Body, Applicant</p>
<p><u>Application assessment</u></p> <p>The Certification Body reviews the application and proposes a planning, timescales and a quote to the Applicant for the audit.</p> <p>The Certification Body determines to which extend the applicant fulfils the Certification requirements.</p>	<p>Audit Plan, Budget Proposal</p>	<p>Applicant, Certification Body</p>
<p><u>Signature of the Certification Agreement & NDA</u></p> <p>Certification Body signs a Certification Agreement with the Applicant.</p> <p>The Applicant and the Certification Body will also sign an NDA to safeguard the confidentiality of their process.</p>	<p>Certification Agreement, NDA</p>	<p>Applicant, Certification Body</p>
<p><u>Communication with RecyClass & data management</u></p> <p>Certification Bodies communicate to RecyClass of any new applications specifying the name of the company, date of the scheduled audit and request of a Certification code. RecyClass will subsequently assign a code (RC00XX-COM-MM-YY-CBS-AN) which must be included on the Audit Report and its associated Certificate.</p>	<p>Certification code, third-party code</p>	<p>Certification Body, RecyClass</p>

<p>The Certification Body creates a code for the new audit as follows:</p> <ul style="list-style-type: none"> • XXXX – 4 digits code provided RecyClass • MM – month of certificate expiration • YY – year of certificate expiration • XXX – code of the Certification Body • XX – Auditor’s initials <p>If needed, RecyClass will provide a third-party code for the verification of the Audit Report.</p>		
<p><u>Documentation Review</u></p> <p>The Applicant designates a person as the main contact with the Certification body and a person or group of persons with management responsibilities for the exchange of documentation and additional information related to the products, production process and management system related to the Certification prior to the on-site audit.</p> <p>The Certification Body evaluates the information and documentation provided, requests additional clarifications if needed, and assesses to which extend the applicant fulfils the Certification requirements.</p>	<p>Recycler’s documentation</p>	<p>Recycler, Certification Body</p>
<p><u>On-site Audit</u></p> <p>A recognised auditor from the Certification Body conducts the on-site audit upon agreeing a date with the <i>Recycler</i>.</p> <p>The auditor will:</p> <ul style="list-style-type: none"> - Inspect the site, Recycling Process/es and Recycled Outputs; - Determine that all information provided is correct and complete; - Assess that the Recycling Process and management systems critical to the conformity of the <i>Recycler</i> with the audit requirements are in place. - Determine compliance with the requirements detailed in the Audit Scheme. <p>The onsite audit will take place during 1 day. The time of the audit might vary depending on the number of Recycled Outputs audited, size of the site or complexity of the process.</p>	<p>Audit Scheme</p>	<p>Recycler, Certification Body (auditor)</p>

<p><u>Audit Report Preparation</u></p> <p>After the onsite audit, the Certification Body will prepare the final Audit Report. The draft may be shared with the Applicant to clarify any final questions.</p> <p>Certification Bodies will communicate any non-conformities to the applicant and will request the implementation of corrective actions if needed or describe recommendations for improvement.</p>	<p>Audit Report</p>	<p>Certification Body (auditor)</p>
<p><u>Review and Certification decision</u></p> <p>A recognised auditor from the Certification Body who was not part of the onsite audit, will review the Audit Report (and additional documentation if needed) to ensure it provides an adequate and effective demonstration of the fulfilment of the requirements specified in the Audit Scheme.</p> <p>If the outcome of the review is positive, the recognised auditor makes the decision to issue the Certification. When the review is negative, Certification will not be granted.</p>	<p>Audit Report; Certificate</p>	<p>Certification Body (reviewer)</p>
<p><u>Quality Control</u></p> <p>If applicable, review of the anonymised Certification Report by the RecyClass responsible body.</p>	<p>Anonymised Audit Report</p>	<p>Certification Body, RecyClass quality controller</p>
<p><u>Release of the Audit Report</u></p> <p>Certification Body sends the final version of the Audit Report to the applicant.</p> <p>The Audit Report will be released within 6 weeks of the date of the on-site audit.</p>	<p>Audit Report</p>	<p>Certification Body, Recycler</p>
<p><u>Release of Certificate</u></p> <p>Following a positive outcome, the Certification Body issues the final Certificate.</p> <p>The Certificate must state the the address of the site where the audited Recycling Process/es and the Recycled Outputs produced.</p>	<p>Certificate; Use of Claim Guidance; Certification Mark</p>	<p>Certification Body; Recycler, RecyClass</p>

<p>The Certificate must state the issuing Certification Body and must be signed by the auditor in charge of the audit.</p> <p>The applicant will also be listed in the RecyClass website list of certified companies.</p> <p>The Recycler can use the Certification Mark to communicate that the obtention of the Certification. The Certification Body will also provide the Use of Claims Guidance to the Applicant detailing how the results of the audit may be communicated.</p> <p>The Certification Body will share the final Certificate and Summary Sheet with RecyClass and communicate the finalisation of the auditing process. RecyClass will include information about the certified company on the website. Communication of the granted Certification can also be coordinated with the Applicant.</p> <p>The Certificate and Audit Report will be released within 6 weeks of the date of the onsite audit.</p>		
<p><u>Monitoring Audit</u></p> <p>A monitoring audit will take place once a year.</p> <p>The date of the onsite audit will be agreed between the <i>Recycler</i> and the Certification Body six weeks prior to the expiration date. If the outcome of the audit is positive, the date of validity will be carried down one additional year.</p> <p>In a monitoring audit the Certification code will be changed adapting the year of the validity.</p>		

11. VALIDITY OF CERTIFICATION

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

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

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

If the certificate is withdrawn, the declaration of conformity will no longer be valid.

12. MONITORING AUDITS

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

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

13. SUSPENSION OR WITHDRAWAL OF CERTIFICATION

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

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

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

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

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

In case of withdrawal of the Certification, Certification Bodies must request certification holder to remove claims and use of the Certification mark within the custody of the certification holder and clients. Certification holders are also requested to inform related customers by letter.

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

Certification holders have the right to appeal a decision for withdrawal according to the procedure described in section 8.

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

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

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

14. CHANGES AFFECTING CERTIFICATION

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

When the applicant would like to extend the scope of the conformity assessment, add new polymers, a change on the recycling process or other relevant changes, this must be communicated to their Certification Body who will carry out the necessary actions to amend the Certificate.

Expansion of the Certification can be done after the issue of the Certification via documentation review or on-site audit. Specifically, an on-site audit must take place on the following cases:

- When *Equipment Capacity* is changed by more than 50%;
- When *Input Plastic Waste* is changed (either a change in polymer or form, i.e., rigid or flexible);
- When *Recycled Output* is changed.

15. COST OF CERTIFICATION

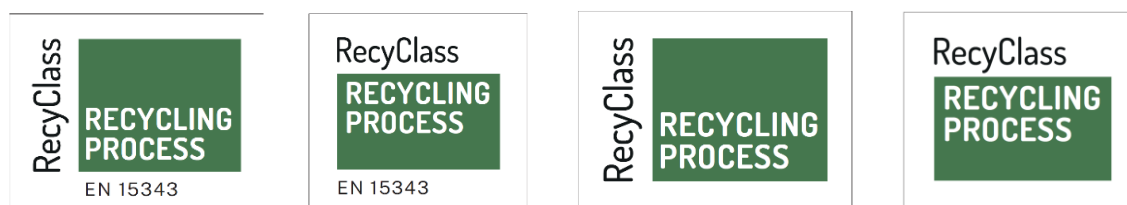
The cost of audits is incurred by the applicant and consists of two separate items:

- RecyClass fee of 150 € for Certification. The fee covers administration and data management costs.
- Certification Body fee which is set independently by Certification Bodies; therefore, the costs may vary. The budget proposal must be provided to the Applicant in advance.

16. USE OF CERTIFICATION MARK

The RecyClass Certification mark can be used on communication materials when referring to certified recycled outputs and recycling processes – for instance on websites, social media platforms, brochures, or banners. The elements of the mark cannot be altered in any way and must be used together as a whole. See the Certification mark in Figure 3.

Figure 3. Certification Mark



Where adequate, the Certification Mark in black and white or in negative can be used. The guidelines and requirements included in the document “Certification Mark Design Guidelines” apply.

The use of the Certification mark is reserved to recyclers holding a valid certificate for business-to-business communication. In case of organisations with several sites, it must be clear what sites the certification applies to. *Recycler* must also clarify to which recycled outputs the certification references to in case of communication with costumers or potential customers.

In addition to the Certification mark, a certification holder may use the certificate, Summary Sheet, and specific claims to communicate the certification of a recycling process/es within a site.

To protect the integrity of the Certification and the validity of the claims, it is important that the Certification mark is used correctly. If you think the Certification mark is being misused, please report it immediately to info@recyclclass.eu

17. MISUSE OF THE CERTIFICATION MARK AND CLAIMS

Unauthorized use of the Certification Mark is not permitted for any Recycling Processes not covered under a Certification.

Examples of misuse include but are not limited to:

- An organization uses the certification mark without being in possession of a valid certificate.
- A certification holder uses the certification mark with an expired or withdrawn Certificate;
- A certification holder uses the certification mark for a Recycling Process/es at a site where substantial changes were made without informing the issuing Certification Body. Substantial changes of the recycling process/es require re-certification or an amendment to the Certificate;
- A certification holder uses the Certification mark for recycled outputs which were not included under the Certification scope.

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

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

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

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

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

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

18. COMMUNICATION

The certificate should not disclose sensible commercial information.

The Audit Report may contain confidential information, particularly in the Annexes with the detailed audit results and detailed volume reconciliation of the recycling process. The certification holder may reserve the right to not disclose the information present in the Annexes. *Recycler* is the only one entitled to choose whether provide the report to their suppliers and customers.

RecyClass may use aggregated data referred to the data of the RecyClass certificates for communication purposes. The list of certified recyclers will be added to the website in a dedicated page.

19. ANNEX I: TERMS OF USE OF CERTIFICATION

Certification holders of any of the RecyClass Certifications must ensure compliance with the criteria below throughout the course of the audit and the duration of a certificate's validity. The following terms are in line with the requirements laid out in ISO/IEC 17065:2013.

- Certification holders must fulfil all Certification requirements as described during the audit preparation. Any significant changes to the process or products under Certification must be communicated to the Certification Body immediately.
- Use of Claims and logos are restricted to certified products and processes following the guidelines provided in this document: "Quality Management and Procedures Version 1.0".
- Certification holders must maintain records and address any complaints submitted related to a valid Certification.
- Certification holders must not use any RecyClass Certificate in a manner which could bring RecyClass and its Certification Bodies into a dispute.
- In case of withdrawal of a Certificate by the Certification Body, certification holder must stop the use of the associated claim and Certification mark.
- Certification holders must inform the relevant Certification Body of any changes that may affect the ability of a package to conform with the Certification requirements. Certification holders might request an extension of the Certification.

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