

# RecyClass

## AUDIT SCHEME MODULE A: FOOD CONTACT

### RECYCLING PROCESS & RECYCLED PLASTICS TRACEABILITY CERTIFICATION

#### RECYCLED PLASTICS

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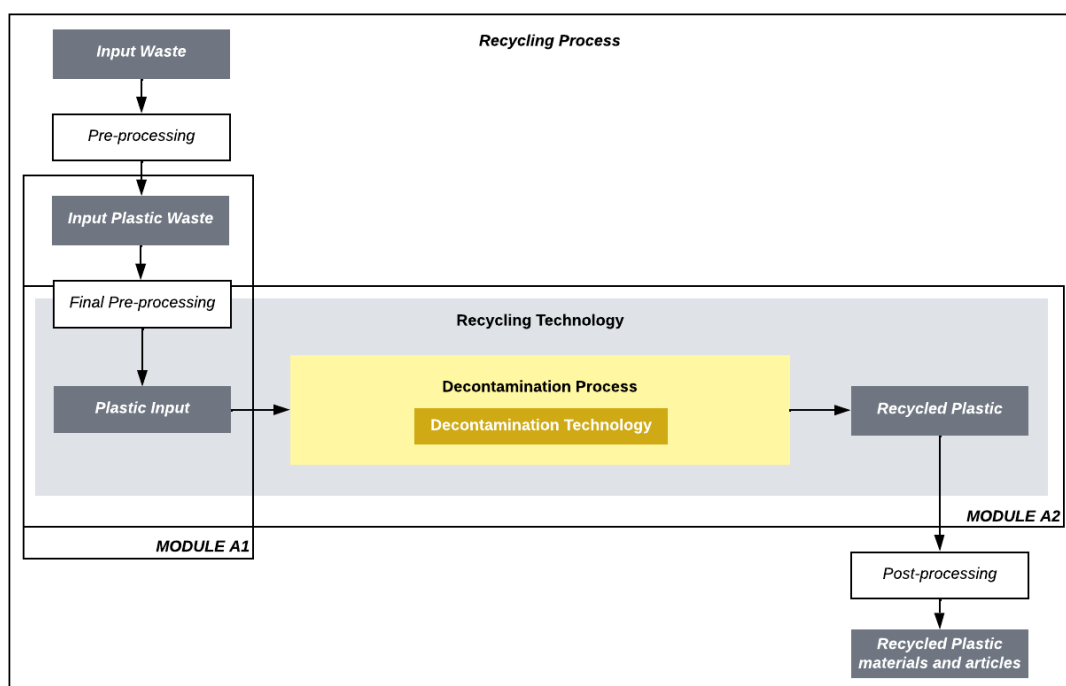
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## 1. INTRODUCTION

Module A describes a set of additional requirements for *Certification of Recycling Processes*<sup>1</sup> producing a *Plastic Input* to be used in a *Decontamination Process* or a *Recycled Plastic* intended to come into contact with foods. Module A requirements were developed in line with Regulation (EU) N° 2022/1616<sup>2</sup>, referred to as the Regulation in this document. Specifically, this module aligns with the requirements established for collection and pre-processing, as well as *Suitable Recycling Technologies*.

*Organisations* applying for *Certification* with *Pre-processing* operations or a *Decontamination Process* using a *Suitable Recycling Technology* must extend the conformity of the general audit scheme requirements, traceability level 1 with this module. *Plastic Inputs* to be used in a *Decontamination Process* or *Recycled Plastic* suitable for food contact can only be included in the audit evaluation when Module A applies<sup>3</sup>. Audit requirements are classified between two sub-modules: Module A1 and A2 as shown in Figure 1.

**Figure 1: Overview of the Recycling Process in line with the definitions set in Regulation**



**Module A1** covers additional requirements to be met by *Organisations* receiving an *Input Plastic Waste* and performing *Final Pre-processing* operations producing an output to be used as a *Plastic Input* for a *Decontamination process*.

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

<sup>2</sup> OJ L 243, 20.9.2022, p. 3–46 available at [Regulation - 2022/1616 - EN - EUR-Lex \(europa.eu\)](https://eur-lex.europa.eu/eli/reg/2022/1616/en)

<sup>3</sup> *Organisations* producing a *Plastic Input* for a *Decontamination Process* or a *Recycled Plastic* to be used in contact with food and non-food *Recycled Outputs* can still apply for *Certification* under the general requirements only for those non-food *Recycled Outputs*.

**Module A2** covers additional requirements to be met by *Organisations* with a *Decontamination Process* classified as a *Suitable Recycling Technology* producing a *Recycled Plastic* suitable for use in contact with food.

Please refer to section 3 and 4 for more information about the scope of these sub-modules.

## **Disclaimer**

**Certification does not constitute proof of food contact approval or guarantees full compliance with Regulation (EU) N° 2022/1616.** It rather provides confidence that *Organisation* follows structured procedures and controls to conduct *Final Pre-processing* operations or a *Decontamination Process* to produce a *Recycled Plastic* suitable for contact with food.

## 2.TERMS AND DEFINITIONS

Defined terms are marked in *italics* and start with a capital letter. The definitions used in Module A are consistent with those outlined in Article 2 of the Regulation. However, these definitions may differ from those used in the main Recycling Process and Recycled Plastics Traceability Audit Schemes. Careful consideration of these differences is necessary to avoid confusion during the audit process described in the following sections.

## 3. MODULE A1 CERTIFICATION DETAILS

Module A1 requirements cover the treatment of *Input Plastic Waste* in a *Final Pre-processing* operation and the production of a *Plastic Input* to be used in a *Decontamination Process*. Module A1 focuses on checking the quality assurance, origin of the waste and traceability of *Input Plastic Waste* in line with the requirements of Article 6 of the Regulation.

This Module is an extension of requirements of the Recycling Process Audit Scheme for all *Final Pre-processing* operations. However, derogations from the requirements of the Regulation set in *Novel Technologies* cannot be considered for *Certification*.

Module A1 can be issued for *Organisations* worldwide.

### SECTION A1.1 ADMINISTRATION

#### A1.1.1 RECORD LIBRARY

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

- List of inputs and outputs
- Input specifications
- Technical data sheet and certificates of analysis
- Delivery notes
- Transport documentation
- Export documentation
- Output invoices
- Weighing tickets
- Loading trucks for delivery
- Others

Alternatively, *Organisation* has a suitable digital system that automatically scans and records the data above. Records are kept for a period of at least 5 years.

*Assessment level Category 2*

#### A1.1.2 INTERNAL AUDITING

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

*Assessment level Category 1*

## SECTION A1.2 INPUT REQUIREMENTS

### A1.2.1 INPUT PLASTIC WASTE ORIGIN

*Input Plastic Waste* originates from municipal waste or food retail or other businesses where it was only intended and used for contact with foods including waste discarded from a *Recycling Scheme*. Purchasing waste characterization describes the origin of the waste.

*Input Plastic Waste* that is part of a *Recycling Scheme* originates only from operators that are part of the scheme. *Input Plastic Waste* originates from business to business or industrial sources. *Input Plastic Waste* is easily recognizable, and it must have a clearly visible *Recycling Scheme marking* displayed. However, due to the recent implementation of the Regulation, *Recycling Scheme marking* requirements by the Regulation, products that were already in circulation may not have a *Recycling Scheme marking* yet.

*Assessment level Category 1*

### A1.2.2 INPUT PLASTIC WASTE ORIGIN - COMPLIANCE WITH REG. (EU) N° 10/2011<sup>4</sup>

*Input Plastic Waste* originates only from materials and articles manufactured in accordance with Regulation (EU) N° 10/2011 or recycled plastic materials and articles manufactured in accordance with the Regulation. There is evidence that the *Input Plastic Waste* originates from the EU 27, Iceland, Liechtenstein, Norway, Switzerland, and the United Kingdom.

Alternatively, when *Input Plastic Waste* originates outside of those countries, *Organisation* must provide a report addressing all the criteria outlined in the annex below as evidence of equivalence of a national legislation with Regulation (EU) N° 10/2011. The report must be issued by a national competent authority of the waste's country of origin or a third-party legal office. When the report is issued by a third-party legal office, the report must be endorsed by a national competent authority.

The report must confirm that the legislation from the waste's country of origin is equivalent to, or imposes stricter requirements than, Regulation (EU) N° 10/2011.

*Assessment level Category 1*

### A1.2.3 INPUT PLASTIC WASTE SEPARATE COLLECTION

*Input Plastic Waste* originates from a *Separate Collection* system that meets the following requirements:

- it consists only of plastic materials and articles meeting the requirements of A1.2.1 and A1.2.2 which have been collected separately for recycling from any other waste;
- it is collected together with other packaging waste fractions of municipal waste or with other non-packaging plastic, metal, paper or glass fractions of municipal waste collected separately from residual waste for recycling;

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<sup>4</sup> OJ L 12, 15.1.2011, p. 1–89 available at [Regulation - 10/2011 - EN - EUR-Lex \(europa.eu\)](http://Regulation - 10/2011 - EN - EUR-Lex (europa.eu))

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- it collects only non-hazardous waste; Separate Collection systems must exclude hazardous waste products that depict the symbols found in Figure 2 (e.g. pesticides, solvents, paints, etc.).

**Figure 2. Hazardous product symbols excluded by collection systems**



- it is designed and carried out to minimise contamination of collected plastic waste from any plastic waste not meeting the requirements of A1.2.1 and A1.2.2 or other waste (including any prior sorting operations)

Separate Collection systems compliant with the requirements above can be found in the Table 1.

**Table 1. Collection Schemes classification**

| Collection Scheme   | Compliant | Non-compliant |
|---|-----------|---------------|
| Deposit Return System (DRS)   | X         |               |
| Door-to-door, drop off collection plastic packaging with or without metal, and/or paper, and/or glass and / or other types of packaging | X         |               |
| Mixed collection  |           | X             |
| Waste plastic sorted from non-separately collected residual waste   |           | X             |
| Hand picking from littering   |           | X             |
| Hand picking after non separate collection  |           | X             |
| Ocean plastic   |           | X             |

There is a declaration of the waste supplier and/or waste purchase specification confirming conformity of this requirement. There is publicly available information of the *Separate Collection* system used in the waste collection as evidence.

*Input Plastic Waste* part of a *Recycling Scheme* is collected separately from any other waste. All involved operators act in accordance with the instructions obtained from the manager of the *Recycling Scheme* and establish measures to prevent incidental contamination with materials or substances other than those permitted by the *Recycling Scheme*.

*Assessment level Category 1*

## A1.2.4 INPUT PLASTIC WASTE COLLECTION & SORTING – QUALITY ASSURANCE SYSTEM

*Input Plastic Waste* is collected and sorted within *Organisations* with a quality assurance system in place guaranteeing the origin of the waste, *Separate collection* and traceability of the waste.

Suppliers of *Input Plastic Waste* are certified by RecyClass following a transition period established by RecyClass or the European Commission<sup>5</sup>.

*Assessment level Category 1*

## A1.2.5 BATCH DEFINITION

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

*Assessment level Category 1*

## A1.2.6 BALES INPUT QUALITY CONTROL

*Organisation* has structured and consistent procedures<sup>6</sup> in place to determine the quality of incoming bales and their percentage of non-food contact articles contained in the batch against specification. There is a SOP to proceed with the quality check specifying a batch and frequency of testing. There is a SOP to process complying batches and reject or treat adequately non-compliant batches. Results of the quality check are documented and stored.

*Assessment level Category 1*

## SECTION A1.3 RECYCLING PROCESS – PRE-PROCESSING

### A1.3.1 USE OF CHEMICALS

The use of any chemicals within the Pre-processing operations do not introduce a safety risk to the output. This includes but it is not restricted to lubricants, detergents and washing additives.

*Assessment level Category 1*

### A1.3.2 WASHING PROCESS CONTROL PARAMETERS

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

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<sup>5</sup> RecyClass is currently developing an audit scheme for Pre-processing operations focused on sorting aiming at fulfilling the requirements for certification included in Regulation (EU) N° 2022/1616, article 6.

<sup>6</sup> A procedure is currently available for the suitable technology “mechanical recycling of PET: “Methodology to check the quality of baled PET waste”. This document can be used as guidance.



Any changes on the control parameters are justified and recorded.

*Assessment level Category 1*

### A1.3.3 RINSING PROCESS CONTROL PARAMETERS

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

*Assessment level Category 1*

## SECTION A1.4 QUALITY MANAGEMENT

### A1.4.1 PREVENTING INCIDENTAL CONTAMINATION

There is a documented procedure established within the daily operation of *Site* to prevent incidental contamination of material.

*Assessment level Category 1*

### A1.4.2 OUT OF SPECIFICATION LOAD PROCEDURE

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

*Assessment level Category 1*

### A1.4.3 OUTPUT COMPOSITION

There is an internal procedure and quality control system in place to ensure that *Plastic Input* composition fulfils the requirements described in Annex I, Table 1(5) of the Regulation found in the table 2.

**Table 2. Plastic Input requirements**

|                                   |  |
|-----------------------------------|--|
| <b>Post-consumer PET</b>          | Plastic Input contains a maximum of 5 % of materials and articles that were used in contact with non-food materials or substances.   |
| <b>Plastic from product loops</b> | Plastic Input are chemically uncontaminated plastic materials and articles produced from a single polymer or from compatible polymers which were used or intended for use under the same conditions of use and solely obtained from a product loop which is in a closed and controlled chain and excludes collection from consumers. |

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If *Plastic Input* is used as input in a novel technology process, input requirements specified in the Application dossier apply.

*Assessment level Category 1*

## A1.4.4 LABELLING OF *RECYCLED PLASTIC*

*Organisation* labels individual batches of *Plastic Input*. These are identified by a unique number and the name of the manufacturing stage they originate from.

*Assessment level Category 1*

## A1.4.5 BATCH RECALL PROCEDURE

There is an internal system in place to remove a batch of material from its current classification if the requirements such as the conditions defined in the Annex I Table 1 (5) of Reg. (EU) 2022/1616 on specification of *Plastic input* are not met. The system and previous recalls are documented.

*Assessment level Category 2*

## SECTION A1.5 HEALTH AND SAFETY

### A1.5.1 ACCESS RESTRICTIONS

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

*Assessment level Category 1*

### A1.5.2 FIRE RISK MANAGEMENT

There is a fire protection plan in place to ensure that fire risk within the recycling plant is minimised. There is a fire drill once per year.

*Assessment level Category 1*

### A1.5.3 PEST CONTROL SYSTEM

*Organisation* has an efficient pest control system in place for *Site*. Records are available.

*Assessment level Category 2*

## MODULE A2 CERTIFICATION DETAILS

The requirements of Module A2 apply to *Decontamination Processes* of a *Plastic Input* transformed into a *Recycled Plastic* suitable for food contact. Conformity with this module can only be issued for *Decontamination Processes* that use a *Suitable Recycling Technology* listed in Annex I, Table 1 of the Regulation. Furthermore, *Organisations* applying to Module A2 must receive all *Plastic Input* to be used in a *Decontamination Process* from suppliers certified according to RecyClass Module A1.

*Organisations* using a *Novel Technology* in their *Decontamination Process* to produce a *Recycled Plastic* cannot obtain Certification for this Module. However, *Certification* can still be issued for the general audit requirements in EU 27, Iceland, Liechtenstein, Norway, Switzerland, and the United Kingdom.

A *Decontamination Process* can take place in an *Organisation* that does not hold a waste permit since a *Plastic Input* may no longer be a waste. Therefore, Module A2 can be issued in combination with the requirements of the Recycling Process or Recycled Plastics Traceability Audit Schemes.

Module A2 can be issued for *Organisations* worldwide. Please note that a successful audit for the Compliance Monitoring Summary Sheet (CMSS) by the competent authority must be in place.

### SECTION A2.1 ADMINISTRATION

#### A2.1.1 REGISTRATION IN THE UNION REGISTER

*Organisation* is listed in the *Union Register* with an active status. The information included in the *Union Register* regarding the company name, address of the head office and recycling facilities, decontamination installations and *Decontamination Technologies* is correct.

There is evidence that *Organisation* notified the installation and either the address of the facility where it is located or the facility number to the European Commission and to the corresponding competent authority, as well as its own registration number if the recycler is already registered, the recycling authorisation number if it applies an authorised process, and the number of the *Suitable Recycling Technology*.

*Organisations* operating a *Recycling Scheme* are also listed in the *Union Register*. There is a single legal entity acting as the manager of *Recycling Scheme* who is responsible for its overall functioning, and who can show evidence that it has contacted a Competent Authority in the territory where it is established. Information shared includes a summary of *Recycling scheme*, the details of *Recycling scheme marking*, a list of Member States where *Organisations* participating in *Recycling scheme* are located, and references to any decontamination installations used. The manager of a *Recycling Scheme* provided a single document to all participating business operators and other participating organisations. The document sets out the objectives of the scheme, explain how it functions, provide instructions, and set out the detailed obligations placed on all scheme operators. This information is kept up to date.

*Organisation* received the following registration numbers: 'RON' (recycler operator number), 'RIN' (recycling installation number), 'RFN' (recycling facility number).

*Assessment level Category 1*

## A2.1.2 EUROPEAN COMMISSION AUTHORISATION

*Organisation* applied to obtain an authorisation Decision of a *Recycling Process* to the competent authority of a Member State in line with the Regulation and received a response acknowledging the receipt of the application in writing.

The application included the name and address of the applicant, a technical dossier detailing *Pre-processing*, post-processing, intended use of the resulting *Recycled Plastic*, instruction for labelling for converters and end-users of the *Recycled Plastics*, a simple diagram of the operations in the *Decontamination Process* and quality control procedures including values of monitored parameters.

*Organisation* received a positive EFSA opinion or a license agreement from a technology supplier.

*Organisation* received a recycling authorisation number 'RAN' or 'RSN' (*Recycling Scheme* number) if applicable. When *Organisation* took all necessary steps but did not receive a response from the European Commission, this requirement does not apply.

*Assessment level Category 1*

## A2.1.3 RECORD LIBRARY

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

- List of inputs and outputs
- Supplier's certificate<sup>7</sup>
- Technical data sheet and certificates of analysis
- Delivery notes
- Transport documentation
- Export documentation
- Output invoices
- Weighing tickets
- Loading trucks for delivery
- Others

Alternatively, *Organisation* has a suitable digital system that automatically scans and records the data above. *Organisation* records information on the quality of individual batches following the *Organisation's* quality assessment recording systems as defined in their Compliance Monitoring Summary Sheet.

A repository of the records is retained for a period of at least 5 years.

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

*Assessment level Category 1*

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<sup>7</sup> *RecyClass* currently recognises certificates for *RecyClass Recycling Process with Module A1* for suppliers of Plastic Input. Any additional recognised certifications will be publically announced if their equivalence can be verified.

## A2.1.4 INTERNAL AUDITING

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

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

*Assessment level Category 1*

## SECTION A2.2 INPUT REQUIREMENTS

### A2.2.1 PLASTIC INPUT REQUIREMENTS - COLLECTION

*Organisation* ensures that *Plastic Input* meets the following requirements:

- originates from municipal waste or food retail or other businesses where it was only intended and used for contact with foods including waste discarded from a *Recycling Scheme*;
- Originates from waste produced in compliance with Regulation (EU) N° 10/2011;
- Originates from separate collection or is part of a *Recycling Scheme*; Refer to requirement A1.2.3.

*Plastic Input Final Pre-processing* operation is certified according to RecyClass Module A1. If module A1 has been validated on *Site*, this section does not apply.

*Assessment level Category 1*

### A2.2.2 COMPLIANCE WITH SPECIFICATION OF *PLASTIC INPUT*

*Organisation* has documentation in place from its supplier or an internal procedure to ensure that the *Plastic Input* meets the specification set in Annex I Table 1 (3) and (5) of Reg. (EU) 2022/1616 as reported in table 3.

**Table 3. Plastic Input requirements**

|                                   |  |
|-----------------------------------|--|
| <b>Post-consumer PET</b>          | Plastic Input contains a maximum of 5 % of materials and articles that were used in contact with non-food materials or substances.   |
| <b>Plastic from product loops</b> | Plastic Input are chemically uncontaminated plastic materials and articles produced from a single polymer or from compatible polymers which were used or intended for use under the same conditions of use and solely obtained from a product loop which is in a closed and controlled chain and excludes collection from consumers. |

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

*Assessment level Category 1*

## A2.2.3 QUALITY ASSURANCE SYSTEM – PRE-PROCESSING

There is evidence that suppliers of *Plastic Input* have a quality assurance system in place as defined in the Regulation focused on the origin of the waste and traceability.

There is evidence that operators of a *Recycling Scheme* follow the instructions provided by the manager of the *Recycling Scheme*, including a procedure to prevent incidental contamination with materials or substances other than those permitted by the *Recycling Scheme*.

*Assessment level Category 1*

## A2.2.4 BATCH DEFINITION

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

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

*Assessment level Category 1*

## SECTION A2.3 RECYCLING PROCESS – DECONTAMINATION

### A2.3.1 COMPLIANCE MONITORING SUMMARY SHEET

*Organisation* duly completed the CMSS following the template found in Annex II of the Regulation. The document describes the currently installed technology and its parameters.

*Organisation* obtained a positive result on the CMSS audit from the competent authority within 1 year from the start date of the production of *Recycled Plastic* in *Decontamination Process*.

*Organisations* operating a *Recycling Scheme* are exempt from this requirement.

*Assessment level Category 1*

### A2.3.2 SUITABLE TECHNOLOGY RESTRICTIONS

*Organisation* operates *Decontamination Process* in line with the process specifications described in the Compliance Monitoring Summary Sheet and the requirements in Annex I Table 1 of Reg. (EU) 2022/1616. The use of *Plastic Input* meets the requirements of the EFSA positive opinion which might set restrictions on its use.

*Assessment level Category 1*

### A2.3.3 CRITICAL DECONTAMINATION OPERATIONS

The Critical Control Points (CCP) identified in the EFSA opinion of the *Organisation* are correctly implemented and documented in the Compliance Monitoring Summary Sheet.

There is a robust recording system in place for monitoring CCP's which is clearly linked to individual production batches.

*Assessment level Category 1*

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

### A2.4.1 INTENDED USE IDENTIFIABLE

The intended use of the *Recycled Plastic* is clearly detailed in the declaration of compliance of *Recycled Plastic*. Instructions and information for *Recycled Plastic* about the maximum permitted recycled content and restrictions of use for converters and other supply chain actors are provided as stated in part A of annex III of the Regulation.

*Assessment level Category 1*

### A2.4.2 LABELLING OF *RECYCLED PLASTIC*

Individual *Batches of Recycled Plastics* are identified by a unique number and the name of the manufacturing stage they originate from.

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

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

Furthermore, *Organisations* producing a *Recycled Plastic article that is part of a Recycling Scheme* must label it with their corresponding *Recycling Scheme Marking*. The marking is clearly visible and indelible, and it is registered in the Union register.

*Assessment level Category 1*

### A2.4.3 *RECYCLED PLASTIC* REQUIREMENTS

There is an internal procedure and quality control system in place to ensure that *Recycled Plastic* from a *Decontamination Process* meets the output specifications found in Annex I, Table 1(5) of the Regulation found in the table 4.

**Table 4. *Recycled Plastic* requirements**

|                                   |   |
|-----------------------------------|---|
| <b>Post-consumer PET</b>          | Recycled Plastic is decontaminated PET. Final materials and articles are not to be used in microwave and conventional ovens. additional specifications may apply to output from individual processes.   |
| <b>Plastic from product loops</b> | Recycled Plastic are remoulded materials and articles intended to be used for the same purpose and under the same conditions of use as the materials and articles circulated in the recycling scheme from which the plastic input was obtained. |

Individual *Recycling Processes* may have additional specifications.

*Assessment level Category 1*

## SECTION A2.5 QUALITY MANAGEMENT

### A2.5.1 BATCH QUALITY REPOSITORY OF RECORDS

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

*Assessment level Category 2*

### A2.5.2 DECLARATION OF COMPLIANCE

*Organisation* has a declaration of compliance following the template found in Annex III of the Regulation. The document is issued for all *Batches* of *Recycled Plastic*, in order to establish the identity of the *Organisation*, the recycled origin of the plastic, and to provide instructions to the converters and final users regarding its use.

*Assessment level Category 1*

### A2.5.3 STANDARD OPERATING PROCEDURES

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

SOP include procedures for at least the following cases:

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

*Assessment level Category 1*

## SECTION A2.6 HEALTH AND SAFETY

### A2.6.1 ACCESS RESTRICTIONS

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

*Assessment level Category 1*

### A2.6.2 FIRE RISK MANAGEMENT

There is a fire protection plan in place to ensure that fire risk within the recycling plant is minimised. There is a fire drill once per year.

*Assessment level Category 1*



## A2.6.3 PEST CONTROL SYSTEM

*Organisation* has an efficient pest control system in place for *Site*. Records are available.

*Assessment level Category 2*

## ANNEX I: DEFINITIONS

*The following definitions are aligned with the definitions of Reg. (EU) 2022/1616 on recycled plastic materials and articles intended to come into contact with foods reported in article 2. The following definitions apply only to this Module and might differ from those included in the Audit Scheme.*

### **Batch**

[Regulation (EU) N° 2022/1616, article 2.3(20)]

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

### **Converter**

[Regulation (EU) N° 2022/1616, article 2.3(17)]

Means any natural or legal person that carries out one or more post-processing unit operations.

### **Decontamination Process**

[Regulation (EU) N° 2022/1616, article 2.3(9)]

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

### **Decontamination Technology**

[Regulation (EU) N° 2022/1616, article 2.3(2)]

means a specific combination of physical or chemical concepts, principles, and practices part of a recycling technology which have as primary purpose to remove contamination or to purify.

### **Final pre-processing**

means waste management operations carried out at an *Organisation* receiving a plastic waste and reaching an end of waste by producing a recycled output.

### **Incidental Contamination**

[Regulation (EU) N° 2022/1616, article 2.3(10)]

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

### **Novel technology**

[Regulation (EU) N° 2022/1616, article 3, adapted]

means a Recycling Technology that has not been subject to a decision on its suitability according to the procedures described in Regulation (EU) N° 2022/1616.

### **Organisation**

In this Module, *Organisations* are waste management companies, recyclers or converters applying for *Certification* for a *Recycling Process* at a *Site*. *Note 1.* ‘recycler’ means any natural or legal person who applies a decontamination process under Regulation (EU) 2022/1616; *Note 2.* ‘converter’ means any natural or legal person that carries out one or more post-processing unit operations.

## **Plastic Input**

[Regulation (EU) N° 2022/1616, article 2.3(8)]

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

## **Pre-processing**

[Regulation (EU) N° 2022/1616, article 2.3(7)]

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

## **Post-processing**

[Regulation (EU) N° 2022/1616, article 2.3(11)]

Means all unit operations subsequent to the decontamination process by which its output is further polymerised, otherwise treated, and/or converted, resulting in recycled plastic materials and articles in their finished state.

## **Recycled Plastic**

[Regulation (EU) N° 2022/1616, article 2.3(4)]

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

## **Recycler**

[Regulation (EU) N° 2022/1616, article 2.3(16) adapted]

means any natural or legal person who applies a decontamination process. Additionally for the purposes of this document, a recycler is also any natural or legal person that carries out one or more Final pre-processing operations.

## **Recycling Process**

[Regulation (EU) N° 2022/1616, article 2.3(3)]

means a sequence of unit operations that is intended to manufacture recycled plastic materials and articles through pre-processing, a decontamination process and post-processing, and which is based on a specific recycling technology.

Note. For the purpose of this document, Recycling Process definition is split between *Pre-processing* in Module A1 and *Decontamination Process* in Module A2.

## **Recycling Scheme**

[Regulation (EU) N° 2022/1616, article 2.3(15)]

Means an arrangement between legal entities to manage the use, separate collection and recycling of plastic materials and articles with the objective to limit or prevent their contamination in order to facilitate their recycling.

## **Recycling Scheme Marking**

[Regulation (EU) N° 2022/1616, article 9(5), adapted]

Unique label established in a Recycling Scheme registered in the Union register of the European Commission.

## **Recycling Technology**

[Regulation (EU) N° 2022/1616, article 2.3(1)]

means a specific combination of physical or chemical concepts, principles, and practices to recycle a waste stream of a certain type and collected in a certain way into recycled plastic materials and articles of a specific type and with a specific intended use, and includes a decontamination technology.

# RecyClass

## **Suitable Recycling Technology**

[Regulation (EU) N° 2022/1616, article 3, adapted]

means a recycling technology considered suitable by the European Commission. Suitable recycling technologies are listed in Annex I of Regulation (EU) N° 2022/1616.

## **Union Register**

[Regulation (EU) N° 2022/1616, article 24, adapted]

Means a public register of novel technologies, recyclers, recycling processes, recycling schemes and decontamination installations the European Commission register established.

## ANNEX II: EVIDENCE REPORT CHECKLIST – REQUIREMENT A1.2.2

The below checklist provides information on how to demonstrate compliance with requirement A1.2.2 Input Plastic Waste origin – Compliance with Regulation (EU) N° 10/2011, receiving waste from outside the EU 27, Iceland, Liechtenstein, Norway, Switzerland, and the United Kingdom.

The report must justify the equivalence and provide a comparison between Regulation (EU) N° 10/2011 and the equivalent national regulation. A list of authorised substances must be included detailing SMLs and restrictions and limitations for their use.

| Requirement   | Evidence of equivalence  | Check  |
|---|--|--|
| <b>1.0 Substances</b>   |  |  |
| 1.1 List of authorised substances                             | <ul style="list-style-type: none"> <li>List of authorised substances equal or stricter than Regulation (EU) N° 10/2011.</li> </ul>                                   | <p>Is there a list of authorized substances approved for use in the manufacture of food contact plastics equal to Annex 1 of Regulation (EU) N° 10/2011?</p> <p>There is a confirmation that no other substances than the ones included in this list can be used for the manufacture of plastics in contact with food.</p>   |
| <b>2.0 Testing Protocols</b>                                  |  |  |
| 2.1. Migration Testing Protocols                              | <ul style="list-style-type: none"> <li>Protocol for migration tests equal or stricter than the method specified in Annex V of Regulation (EU) N° 10/2011.</li> </ul> | <p>Are the conditions described for testing migration levels to ensure compliance with the described specific migration limits (SMLs) and overall migration limits (OMLs) equal or stricter than the method specified in Annex V of Regulation (EU) N° 10/2011?</p> <p>Are the migration tests done in line with standard EN 1186?</p>   |
| 2.2 Expression of migration test results                      | <ul style="list-style-type: none"> <li>SML values expression equal or stricter than Regulation (EU) N° 10/2011.</li> </ul>   | <p>Are the specific migration values expressed in mg/Kg applying the real surface to volume ratio in actual or foreseen use in compliance with Article 17 of Regulation (EU) N° 10/2011?</p>   |
| <b>3.0 Material Specifications</b>                            |  |  |
| 3.1. Compliance of Input Materials: Specific migration limits | <ul style="list-style-type: none"> <li>Presence of SMLs per substance equal or stricter than Regulation (EU) N° 10/2011.</li> </ul>                                  | <p>Does the list of substances include individual SMLs to control the amount of the substance that can migrate from the plastic into food?</p> <p>Are the SMLs equal or lower than the ones included in Annex 1 for each specific substance?</p> <p>Do the specific migration values expressed fulfil requirements equal or stricter than the requirements included in article 17 of Regulation (EU) N° 10/2011?</p>   |
| 3.2. Compliance of Input Materials: Overall migration limits  | <ul style="list-style-type: none"> <li>Requirements on OMLs equal or stricter than Regulation (EU) N° 10/2011.</li> </ul>  | <p>Is there an OML for the total amount of any substance that can migrate from the plastic into food equal or lower than 10 ml of total constituents released per dm<sup>2</sup> of food contact surface as specified in article 12 of Regulation (EU) N° 10/2011?</p> <p>In case of plastic material and articles intended to be brought into contact with food intended for infants and young children, is there an OML for the total amount of any substance that can migrate from the plastic into food equal or lower than 60 ml of</p> |

|   |   |   |
|---|---|---|
|   |   | total constituents released per kg of food contact simulant as specified in article 12 of Regulation (EU) N° 10/2011?   |
| 3.3 Compliance of Input Materials: Restrictions and Limitations | <ul style="list-style-type: none"> <li>List of authorised substances includes restrictions and limitations equal or stricter than the ones included in Regulation (EU) N° 10/2011.</li> </ul>         | Does the national legislation include specific restrictions and limitations per substance listed equal or stricter than the ones included in Annex 1, Table 1(10) of Regulation (EU) N° 10/2011?  |
| <b>5.0 Placing on the market</b>                                |   |   |
| 5.1 Declaration of compliance                                   | <ul style="list-style-type: none"> <li>Requirement for manufacturers to provide a declaration of compliance equal or stricter than the requirements included in Regulation (EU) N° 10/2011</li> </ul> | <p>Are the manufacturers of plastics for food contact applications required to provide a Declaration of Compliance prepared in accordance with requirements equal or higher than the requirements included in article 15, article 16 and annex IV of Regulation (EU) N° 10/2011?</p> <p>Does the declaration of compliance include the identity of the manufacturer or importer, the intended use of the plastic materials and articles and the conditions and results of testing, calculations, including modelling, other analysis, and evidence and reasoning on the safety of the product placed on the market?</p> |
| 5.2 Product Labelling Requirements                              | <ul style="list-style-type: none"> <li>Requirements for labelling equal or stricter than the ones specified in Regulation (EU) N° 10/2011</li> </ul>  | Do plastic products intended to come into contact with food have labelling requirements specifying the intended use, any limitations or prohibitions and are printed in the official language of the market where the product is sold as specified in Article 4 of Regulation (EC) N° 1935/2004?  |
| <b>6.0 Plastics production</b>                                  |   |   |
| 6.1 Good manufacturing practice (GMP)                           | <ul style="list-style-type: none"> <li>Requirements on good manufacturing practices equivalent to Regulation (EU) N° 2023/2006.</li> </ul>  | Does the national legislation establish GMPs to ensure consistent quality and safety of plastics equivalent to Regulation (EU) N° 2023/2006?  |
| 6.2 Traceability  | <ul style="list-style-type: none"> <li>Traceability requirements equal or stricter than Regulation (EC) N° 1935/2004.</li> </ul>  | Does the national legislation establish traceability requirements equal or stricter to those included in Article 17 of Regulation (EC) N° 1935/2004?  |
| <b>7.0 Recycled content</b>                                     |   |   |
| 7.1 Recycling national regulations on food contact              | <ul style="list-style-type: none"> <li>National food recycling regulations equal or stricter than Regulation (EU) N° 1616/2022.</li> </ul>  | Does the country in which the material is collected allow recycled plastics in food contact application? If yes, evidence that the national food recycling regulations are in line Regulation (EU) N° 1616/2022.  |

## ANNEX III: TABLE OF CHANGES

| Version | Date          | Section          | Update description  |
|---------|---------------|------------------|---|
| 1.2     | December 2024 | 1                | Eligibility and audit focus clarifications.   |
| 1.2     | December 2024 | 2, annex I       | Review of definitions in line with Regulation (EU) N° 2022/1616.  |
| 1.2     | December 2024 | 3                | Eligibility and audit focus clarifications.   |
| 1.2     | December 2024 | A1.1.1           | Review of the list of documents.  |
| 1.2     | December 2024 | A1.1.2           | Clarification on internal auditing.   |
| 1.2     | December 2024 | A1.2.1           | Revision of requirements for waste origin. Addition of requirements for <i>Recycling Schemes</i> .  |
| 1.2     | December 2024 | A1.2.2, annex II | Revision of requirements and evidence for waste originating outside of the EU27, Iceland, Liechtenstein, Norway, Switzerland, and the United Kingdom to demonstrate equivalence of national legislation for the production of plastics to Regulation (EU) N° 10/2011. |
| 1.2     | December 2024 | A1.2.3           | Clarifications, interpretation and evidence for separate collection.  |
| 1.2     | December 2024 | A1.2.4           | Clarification requirements for quality assurance.   |
| 1.2     | December 2024 | A1.3.1           | Clarification requirements for the use of chemicals.  |
| 1.2     | December 2024 | A1.3.2           | Clarification requirements for washing process.   |
| 1.2     | December 2024 | A1.3.3           | Clarification requirements for rinsing process.   |
| 1.2     | December 2024 | A1.4.1           | Wording clarification.  |
| 1.2     | December 2024 | A1.4.3, A2.2.2   | Addition of a requirement for <i>Plastic Input</i> in line with the requirements established in annex I, table 1(5) of Regulation (EU) N° 2022/1616. Addition of requirements for <i>Recycling Schemes</i> .  |
| 1.2     | December 2024 | A1.4.3           | Wording clarification.  |
| 1.2     | December 2024 | A1.5.2, A2.6.2   | Review of evidence requirements for fire risk management.   |
| 1.2     | December 2024 | A1.5.3, A2.6.3   | Clarification for records for pest control system.  |
| 1.2     | December 2024 | 4                | Eligibility and audit focus clarifications.   |
| 1.2     | December 2024 | A2.1.1           | Addition of requirements for registry of processes for <i>Suitable Recycling Processes</i> .  |

|     |               |        |   |
|-----|---------------|--------|---|
| 1.2 | December 2024 | A2.1.2 | Revision of the documentation requirements related to the European Commission authorisation.  |
| 1.2 | December 2024 | A2.1.3 | Review of requirements for the record library.  |
| 1.2 | December 2024 | A2.1.4 | Clarification requirements for internal auditing.   |
| 1.2 | December 2024 | A2.2.1 | Review of requirements for <i>Plastic Input</i> .   |
| 1.2 | December 2024 | A2.2.3 | Review of requirements for quality assurance. Addition of requirements for <i>Recycling Schemes</i> .   |
| 1.2 | December 2024 | A2.3.1 | Wording clarification.  |
| 1.2 | December 2024 | A2.3.2 | Wording clarification.  |
| 1.2 | December 2024 | A2.3.3 | Wording clarification.  |
| 1.2 | December 2024 | A2.4.1 | Wording clarification.  |
| 1.2 | December 2024 | A2.4.2 | Clarification of requirements for <i>Recycling Schemes</i> .  |
| 1.2 | December 2024 | A2.4.3 | Addition of a requirement for <i>Recycled Plastic</i> in line with the requirements established in annex I, table 1(5) of Regulation (EU) N° 2022/1616. Addition of requirements for <i>Recycling Schemes</i> . |
| 1.2 | December 2024 | A2.5.2 | Wording clarification.  |

| Version | Date      | Section | Update description   |
|---------|-----------|---------|--|
| 1.1     | June 2023 | All     | Update of the reference of Reg. (EU) 2022/1616 published on the 20 <sup>th</sup> of September 2022 in the OJ |
| 1.1     | June 2023 | All     | Update on the definition of non-conformities   |



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