

RecyClass

RECYCLABILITY APPROVALS

QUALITY MANAGEMENT & PROCEDURES

FOR PLASTIC PACKAGING



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RecyClass

DISCLAIMER

RecyClass is an initiative working on enhancing and evaluating the recyclability of plastic packaging and products through a technical perspective. The Recyclability Evaluation Protocols promote recyclability by encouraging industry to test new plastic technologies, materials or product before market launch and giving advice and recommendations to the companies.

The Recyclability Evaluation Protocols are available on the RecyClass website. Companies providing plastic packaging and products concepts are encouraged to use them to self-assess the impact of their solutions on recyclability and highlight potential issues. **However, compliance with RecyClass Recyclability Evaluation Protocols and Design for Recycling Guidelines is not a replacement for an official assessment and may not be used as a marketing tool.**

All tests must follow the Evaluation Protocols recommended by the RecyClass Technical Committees and must be conducted by an independent Testing Facility recognised by RecyClass which has no legal affiliation to the applicant.

More information is reported in the RecyClass Internal Procedures available on the [RecyClass website](#).

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1. INTRODUCTION

This document lays out quality management systems and procedures to obtain a RecyClass Recyclability Approval.

RecyClass Recyclability Approvals offer reliable assessments of the recyclability of a plastic packaging design based on the “RecyClass Recyclability Evaluation Protocols”¹. The overall goal is to maintain the protection of packaged goods and their marketing display functions without obstructing the proper functioning of both the sorting and recycling processes. RecyClass issues two types of Recyclability Approvals – Technology Approvals and Product Approvals. These are issued upon conducted testing in accordance with one of the established Recyclability Evaluation Protocols. Testing results are incorporated in the RecyClass Design for Recycling Guidelines and the RecyClass Online Tool. The full list of approved Technologies and Products can be found on the RecyClass website².

This document provides guidance to the Applicant to ensure a perfect understanding of the requirements, duties and deliverables along the Recyclability Approval Procedure.

2. PROTOCOLS DEVELOPMENT & MAINTENANCE

RecyClass Recyclability Evaluation Protocols are owned, managed, and developed by RecyClass that ensures adequate documentation of their maintenance and improvement.

RecyClass experts regularly review all available documentation including the Protocols, Laboratory Evaluation Report templates, and “Quality Management & Procedures” according to recent developments in the recycling industry and the results of laboratory testing. Any changes and updates are proposed by the RecyClass Technical Committees (TCs) and/or Task Forces and approved by the RecyClass Steering Board (SB), all of which are composed by the actors from the entire plastic value chain (raw material producers, converters, brand owners, retailers, technology providers, recyclers, etc.), in accordance with the “RecyClass Internal Procedures”³. New updates are communicated to recognised Testing Facilities via their main contact.

A non-exhaustive list of developments that would trigger changes to Protocols and related documentation can be found below:

- Changes to relevant European sorting and recycling practices under the focus and scope of the Protocols. Updates will need to be reflected into the Testing Facility documentation.
- Changes in the focus or/and scope of the RecyClass Protocols by the RecyClass SB.
- Repeated feedback from the Testing Facilities following their experience during the testing and completion of the Laboratory Evaluation Report. Such feedback will be presented to the TCs and Task Forces for consideration to improve the Protocols documentation.
- Stakeholders’ feedback and proposals from RecyClass members and supporters. If valuable and relevant to the protocols focus and scope, they will be submitted to the TCs and Task Forces for consideration.

RecyClass considers and records all proposals to the Recyclability Evaluation Protocols and assesses their suitability within the testing scope. Suitable feedback is included in the respective documentation during the review. Reviewed

¹ [RecyClass Recyclability Evaluation Protocols](#)

² [List of Recyclability Approvals](#)

³ [RecyClass Internal Procedures – Governance & Tasks Distribution](#)

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documents are consulted with recognised Testing Facilities and Members to ensure the suitability and fitness of the added requirements or procedures. The RecyClass SB approves the final version of the documents for publication.

3. USE OF OFFICIAL DOCUMENTATION

RecyClass Recyclability Evaluation Protocols are published in English on the RecyClass website⁴. Applicant must use the latest and official RecyClass Recyclability Approval Application Form downloadable from the RecyClass website⁵ and deliver it filled in English to the RecyClass Team to start an Approval Process, along with reading and accepting RecyClass Internal Procedures and the present Quality Management & Procedures document. Recognised Testing Facilities must use the latest and official RecyClass document to conduct the testing and deliver the Laboratory Evaluation Report to the Applicant in English. The Applicant must submit the delivered lab report issued by a recognised independent Testing Facility to the RecyClass TC to receive an endorsement. In-house tests carried out by following the RecyClass Protocols, as well as tests carried out in recognised Testing Facilities but not evaluated by the RecyClass TCs, are not considered as officially approved and cannot be used to claim the recyclability of a technology or product.

The Laboratory Evaluation Report might be amended by both the Applicant and RecyClass Team in case of necessity and to bring clarity to the results. Additional tests might be requested by the RecyClass TCs and/or Task Forces.

Applicants who signed the Recyclability Approval Application Form prior to the publication of an updated version of the Protocol may use the previous version with which they started the evaluation process. Recognised Testing Facilities should offer the opportunity to continue the Recyclability Approval process with the newest versions of the Protocols.

4. RECOGNISED TESTING FACILITIES

RecyClass Recyclability Evaluation Protocols are performed by recognised Testing Facilities duly represented by a recognised representative who operates according to the procedures and the requirements described in both this document and in the “Recognised Testing Facilities - Procedures and Quality Management” document⁶, as well as according to the terms of the Cooperation Agreement between RecyClass and the Recognised Testing Facilities.

The Applicant can contact one or more Testing Facilities recognised by RecyClass for managing the testing protocol and select one to carry out the tests. However, in case the sample submitted for testing requires specific competence, the RecyClass TC can address the Applicant to a specific Testing Facility.

Communication between Testing Facilities and RecyClass must be kept at a regular basis. Testing Facilities must communicate to RecyClass Team any new applications for the Protocols. TC representatives will guide the Testing Facilities and the Applicants in defining the control sample and the testing conditions. Testing cannot start prior to the delivery of a Letter of Agreement from the TC representatives.

⁴ [Recyclability Evaluation Protocols](#)

⁵ [Recyclability Approval Application Form](#)

⁶ [Recognised Testing Facilities - Procedures and Quality Management](#)

5. DATA CONFIDENTIALITY

The entire approval process is covered by a Non-Disclosure Agreement signed between RecyClass and the Applicant to protect confidential information of innovative packaging design tested according to the Recyclability Evaluation Protocols. RecyClass Team provides the NDA template to the Applicant.

All RecyClass TCs members also sign a Non-Disclosure Agreement with RecyClass to be able to participate in the meetings, access the documents and evaluate the Laboratory Evaluation Reports. An updated list of members of the TC in charge of the evaluation is shared with the Applicant before the Laboratory Evaluation Report submission, allowing the applicant to exclude one or more members from the review process – which includes access to the Laboratory Evaluation Report and participation in the assessment discussions.

In addition, a Non-Disclosure Agreement is in place between RecyClass and the recognised Testing Facilities, as defined in the “Recognised Testing Facilities - Procedures and Quality Management” document.

The Applicant can also require the chosen Testing Facility to sign a Non-Disclosure Agreement before starting the testing. This document is then at the discretion of the Applicant and the Testing Facility.

6. LABORATORY EVALUATION REPORT QUALITY CONTROL

RecyClass Team guarantees the quality and rigour of Testing Facilities recognised by RecyClass by performing an onsite audit at least every 2 years. RecyClass Team also guarantees the quality and the rigour of all Laboratory Evaluation Reports via a systematic internal check procedure which ensures coherence and consistency among all issued Laboratory Evaluation Reports. Therefore, all reports must be submitted to RecyClass Team for revision and validation. All information about the quality control and safety measures to ensure high quality reports are presented in the RecyClass Quality Management & Procedures for Recognised Testing Facilities⁷.

7. ELIGIBILITY TO APPLY FOR AN APPROVAL

Any plastic packaging containing at least one innovative feature is eligible for a Recyclability Approval. Innovative feature is defined as a feature not yet tested by RecyClass. Packaging fully covered by the Design for Recycling Guidelines (i.e. for which RecyClass already have enough data) are considered eligible for certification and do not need to be tested via the Protocols and assessed by the TCs. Product and Technology Approvals are dissociated and lead to different Approval Letters. Product Approvals are dedicated to final packaging tested as placed on the market,

⁷ [Recognised Testing Facilities - Procedures and Quality Management](#)

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including its final decoration. Technology Approvals are concerning non-finished packaging, which correspond to packaging with missing features (e.g., closure system, labels, decorations, etc.).

The presently named “innovation” corresponds to:

- A new packaging feature (e.g., additive, adhesive, closure system, decorative technology, inks, etc.) or
- A packaging feature present with a quantity or surface above the current compatibility threshold or
- A new packaging structure.

8. RECYCLABILITY EVALUATION ASSESSMENT PROCESS

The Recyclability Evaluation Protocols provide clear and proven guidance on the evaluation of recyclability of plastic packaging technologies or innovation materials. Additionally, the Protocols aim at facilitating the introduction of innovation or new packaging within recycling processes without disrupting the currently established recycling streams.

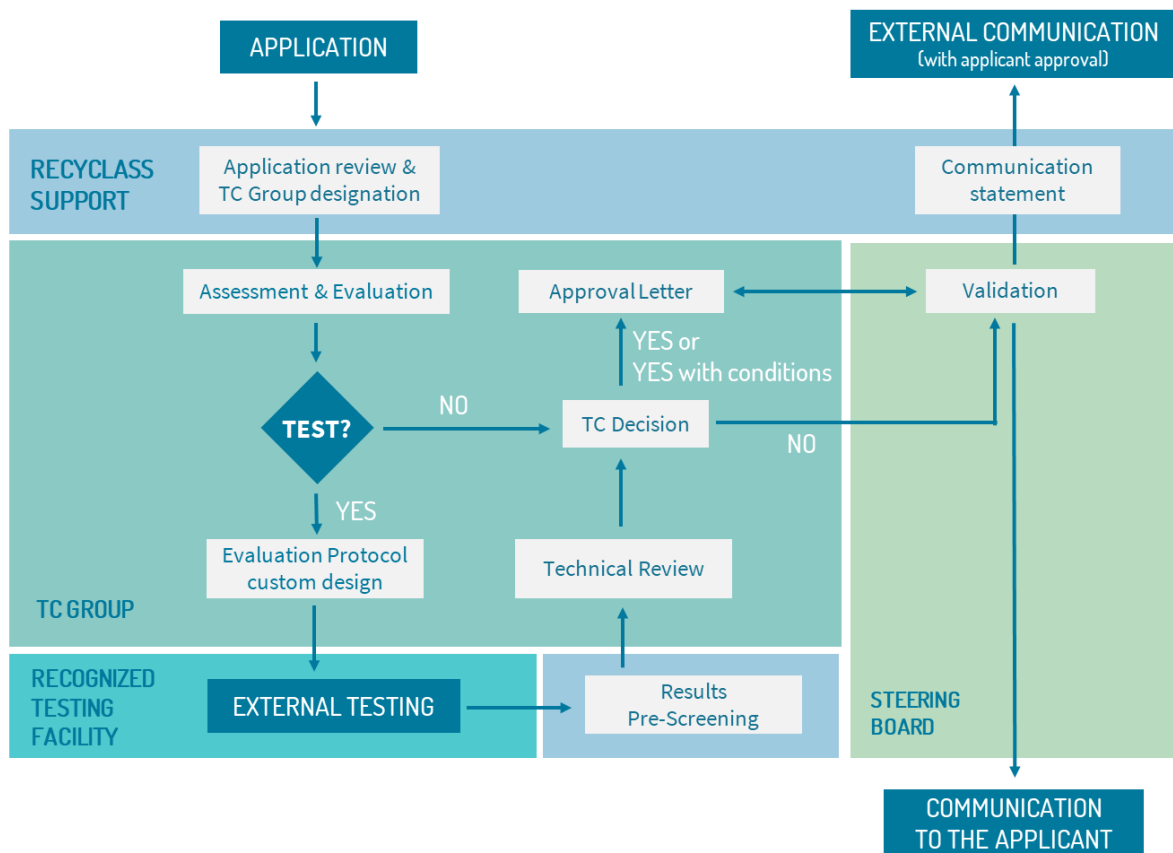
The Recyclability Evaluation Protocols promote plastic packaging recyclability by encouraging industry to test innovative plastic technologies, materials or product before market launch, as well as giving advice and recommendations to applicants.

8.1 OVERVIEW OF THE ASSESSMENT PROCESS

The decision process and the corresponding steps of the Recyclability Approval process are presented in the following figure, while a more detailed overview is presented in section 8.2. Note that a specific procedure is reported in Annex 3 for companies desiring to get a Recyclability Approval for an innovation tested in independent RecyClass test campaigns.

Figure 1: Overview of the Assessment Process Steps for Recyclability Evaluation Protocols

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8.2 DETAILED PROCESS STEPS

Detailed explanation of the process steps is provided in this section. A summary of the Approval process scheme is present in Annex 1. Note that the time necessary for each step of the Approval process can vary depending on e.g. issues faced by the Testing Facility or additional tests required by the TC representatives.

After obtaining an Approval, the Applicant must communicate to RecyClass Team if any changes are made to the evaluated technology or innovation material.

Process-step	Documents	Participants
<ul style="list-style-type: none"> Application submission by the Applicant <p>An Applicant fills in, signs and submits the Application Form.</p> <p>RecyClass Team verifies that the application falls under the scope of RecyClass and the Evaluation Protocols.</p> <p>RecyClass Team provides a NDA template to the Applicant, that can be revised internally by the Applicant. Once the terms of the agreement are defined, both parties must sign the NDA.</p> <p>RecyClass Team shares the Approval – Quality Management & Procedures document and the Application form to fill to the Applicant.</p>	<p>Recyclability Approval Application form</p> <p>NDA with the Applicant</p> <p>Recyclability Approval – Quality Management & Procedures</p> <p>Additional documentations related to the innovation</p>	<p>Applicant</p> <p>RecyClass Team</p>

<p>Upon the signing of the NDA, RecyClass Team request from the Applicant all available documentation, TDS, and information that can help speed up the evaluation process (e.g., Testing Facility tests).</p>		
<ul style="list-style-type: none"> Application Submission to the TC <p>RecyClass Team determines which plastic stream the application corresponds to and assigns a TC that will assess the application. For specific cases, to determine the plastic stream and assign the application to the correct Technical Committee, a sorting test following the RecyClass Sorting Protocol could be requested.</p> <p>RecyClass Team provides the Applicant with the list of 5 TC representatives. The Applicant can have maximum two representatives (to ensure majority) excluded from the discussion by written request justifying the reason for the exclusion. Both TC Chairman and vice chair cannot be simultaneously excluded.</p> <p>RecyClass Team circulates the necessary information provided by the Applicant, except the application form, for the evaluation by the TC representatives. This process is anonymised.</p> <p>Meanwhile, RecyClass Team provides the list of recognised Testing Facilities contacts to the Applicant. The Applicant can contact any of the recognised Testing Facilities from this list to receive a quote for the testing.</p> <p><i>In case the innovation has already been approved by the Association of Plastics Recyclers (APR), please refer to the complementary procedure in Annex 2.</i></p> <p><i>In case the innovation has already been tested during a RecyClass test campaign, please refer to the specific procedure in Annex 3. Next step is the Assessment with a presentation to the TC.</i></p>	<p>Application form</p> <p>List of 5 TC representatives</p> <p>Recognised Testing Facilities contact details</p>	<p>Applicant</p> <p>RecyClass Team</p> <p>TC Representatives</p> <p>Recognised RecyClass Testing Facility</p>
<ul style="list-style-type: none"> Acceptance by TC Representatives <p>The TC representatives start a discussion on how to proceed with the assessment (conversion step, blends, control material, etc.) and on the necessity to have pre-screening tests (e.g. sorting, QT procedures). The Chair of the corresponding TC may facilitate the discussion by making proposals. Proposals are accepted if no answer is provided within 2 weeks from sending it. TC representatives may ask for additional information. RecyClass Team acts as focal point for communication between the Applicant and the TC. Following the TC representatives' decision, RecyClass Team will issue a "Letter of Agreement" to the Applicant which communicates an application code and details all the conditions necessary for</p>	<p>Letter of Agreement</p>	<p>Applicant</p> <p>Non-excluded TC Representatives</p> <p>RecyClass Team</p>

<p>the evaluation of the innovation. In case the Applicant has delegates that are part of the TC, the respective delegates will be excluded from the decision-making process.</p>		
<ul style="list-style-type: none"> Testing proceeding <p>Within the month of the letter's deliverance, the Applicant must provide this letter to a recognised Testing Facility to request the testing following the listed conditions. If expired, the Applicant needs to recontact RecyClass Team. Upon the deliverance of the Letter of Agreement, the Recyclability Evaluation Protocol has to be carried out by a Testing Facility that is recognised by RecyClass (except Annex 2 conditions) upon applicant's expense. The Applicant must provide the recognised Testing Facility with the innovative material in sufficient quantity. The control material can be provided by the Applicant or the Testing Facility (will be charged to the Applicant).</p>	<p>Letter of Agreement Recyclability Evaluation Protocol Laboratory Evaluation Report</p>	<p>Recognised RecyClass Testing Facility</p>
<ul style="list-style-type: none"> Pre-screening of results <p>Once the testing in accordance with the Recyclability Evaluation Protocol has been finalised, the full Laboratory Evaluation Report must be sent to both the RecyClass Team and the Applicant for a pre-evaluation. The Applicant can ask for a call with RecyClass Team to pre-screen the results and the chances for an approval. This test report must be anonymised for its review by the TC.</p>	<p>Laboratory Evaluation Report</p>	<p>Recognised RecyClass Testing Facility Applicant RecyClass Team</p>
<ul style="list-style-type: none"> Decision to present to TC <p>The Applicant decides to submit the anonymised Laboratory Evaluation Report to the corresponding TC or to withdraw the application. In case of withdrawal, the application is closed but can still be discussed to plan future tests. In the other case, RecyClass Team provides the updated list of TC members to the Applicant. The Applicant can exclude TC members from the evaluation process in form of a written request, justifying the reason of the exclusion. At this stage, at least 75% of the TC members, including all the plastic value-chain actors (raw material producers, converters, brands, recyclers, etc.), must have access to the report to ensure an impartial report revision.</p>	<p>List of TC participants</p>	<p>Applicant RecyClass Team</p>
<ul style="list-style-type: none"> Assessment <ul style="list-style-type: none"> - <i>Presentation to the TC</i> <p>The anonymized full Laboratory Evaluation Report and additional documentation provided by the Applicant are</p>	<p>Laboratory Evaluation Report</p>	<p>Non-excluded TC members</p>

<p>shared by the RecyClass Team with the non-excluded TC members. All documents must be anonymised. TC members have 2 weeks to comment and ask questions to the Applicant and/or to the Testing Facility. In the case the Applicant is part of the TC, the designated delegates will be excluded from the process. After the period for comments regarding the Laboratory Evaluation Report, the Applicant will be contacted to reply to the comments raised by the TC members.</p> <p>If relevant, RecyClass Team can present the anonymised innovation and the results in a TC meeting. The Testing Facility that performed the test can be invited to the meeting to support the discussion. This presentation is done to help the TC to better understand the innovation, application and the results. The Applicant is authorized to be present during the presentation but must remain neutral.</p> <ul style="list-style-type: none"> - <i>Compilation of TC comments & Decision by TC representatives</i> <p>RecyClass Team prepares an overview of the received comments and submits them to the TC representatives who have one week to issue a decision regarding the application. The decision must be validated by a majority of the representatives (at least 3). In case the Applicant has delegates that are part of the TC, the designated delegates will be excluded from the decision-making process. The TC representatives can also decide to ask for additional tests to clarify the results before taking a decision. The TC grants a Recyclability Approval as fully compatible or limited compatible for a specific recycling stream. Otherwise, the representatives can reject the application. Temporary approvals might be possible for very novel product concepts and under specific conditions.</p> <ul style="list-style-type: none"> - <i>Approval Letter drafting</i> <p>Upon the approval by the TC representatives, an Approval Letter is drafted by RecyClass Team. The document includes the conclusions of technical review stemming from the Laboratory Evaluation Report and the TC assessment, regarding the recyclability of the evaluated packaging or innovation material. Conditions of the approval are reported in the letter as well. In case the TC representatives decide not to endorse the technology or product, a Non-Approval Letter is drafted to explain the reasons of the rejection to the Applicant, along with providing recommendations for possible improvements. The Applicant is invited to provide comments on the Approval Letter. The Non-Approval Letter is only shared with the TC representatives and the Applicant.</p>	<p>Approval Letter or Non-Approval Letter</p>	<p>Recognised RecyClass Testing Facility (optional) Applicant</p> <p>RecyClass Team TC Representatives</p> <p>RecyClass Team Applicant</p>
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<p>- <i>Approval by SB</i></p> <p>The SB issues the final decision on recommendation of the TC and on the Approval or Non-Approval Letter. Upon the approval, RecyClass Team announces the final decision to the Applicant.</p>	<p>Approval Letter or Non-Approval Letter</p>	<p>SB members RecyClass Team</p>
<ul style="list-style-type: none"> • External communication <p>Results of the evaluation process can be communicated externally either passively (e.g., adapted Design for Recycling Guidelines) or actively (e.g., press release). External communication must be approved by the SB and the Applicant.</p> <p>Approval Letters are published on the RecyClass website (only positive results will be published).</p>	<p>Approval Letter</p> <p>External communication (press release, social media post, ...)</p> <p>RecyClass Design for Recycling Guidelines</p>	<p>Applicant</p> <p>SB</p> <p>RecyClass Team</p>

8.3 AVAILABLE DOCUMENTATION FOR THE APPLICANT

8.3.1 APPLICATION FORM

The Applicant submits the completed Application Form detailing the innovation material or packaging to be approved. RecyClass Team acts as an entry point for all requests.

8.3.2 INTERNAL NON-DISCLOSURE AGREEMENT (INTERNAL NDA)

An Internal NDA is set in place between the SB, TC participants (including AB representatives) and Plastics Recyclers Europe (PRE) to maintain confidentiality within RecyClass.

8.3.3 NDA WITH THE APPLICANT

Non-disclosure agreement to be signed by PRE and the Applicant declaring that PRE will take all reasonable steps to maintain the discretion of the confidential information of the application submitted.

RecyClass SB representatives will not have access to confidential information provided to the TC in order to assess the application and define specific conditions for the testing of the innovation in accordance with the RecyClass Recyclability Evaluation Protocols.

8.3.4 LETTER OF AGREEMENT

The Applicant receives a Letter of Agreement issued by RecyClass after TC representatives agreed on testing the innovative technology or product. This Letter contains a description of the innovation, the application code, but also specific conditions for testing to be carried out such as the control and virgin materials, the blends and converting step to follow. This letter acts as a common agreement on the testing procedure between RecyClass, the Applicant and the recognised Testing Facility.

8.3.5 REGISTER OF SB MEMBERS

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The list of SB representatives is available online on the RecyClass website. The list contains the names of the people that participate in the validation process of the Recyclability Approval process. RecyClass Team must be informed if SB members have a conflict of interest which would de facto prevent them to respect the internal NDA. Elections of SB members happens every 2 years. Applicants having an open application are informed of the change.

8.3.6 LIST OF TC REPRESENTATIVES

The list of TC representatives involved in the Recyclability Approval process who have access to confidential information provided by the Applicant for the purpose of evaluating the impact of their technology is available online on the RecyClass website⁸. The Applicant has the right to ask for exclusion of maximum 2 representatives from the discussion based on a justified reason. Both Chairman and Vice Chair of the TC cannot be excluded simultaneously. This request for exclusion must be made in writing. Elections of TC representatives happens every 2 years. Applicants having an open application are informed of the change.

RecyClass Team must be informed if TC representatives have a conflict of interest which would de facto prevent them to respect the internal NDA.

8.4 LABORATORY TESTING

Each application is first assessed by the TC representatives to determine the necessary amount of testing needed. If testing was already performed as part of an APR recognition, refer to the Annex 2. RecyClass Recyclability Evaluation Protocols are based on the standard test procedures depending on the specific packaging design. RecyClass is aware of the high costs that may be associated with laboratory testing and will recommend the most optimised solution for the testing.

The Recyclability Evaluation Protocols are available to download on the RecyClass website⁹. Companies providing plastic packaging concepts are encouraged to use them to self-assess the impact of their solutions on recyclability and highlight potential issues. However, compliance with a Recyclability Evaluation Protocol is not a replacement for an official assessment and may not be used as a marketing tool.

To obtain an official Approval, all tests must follow the Recyclability Evaluation Protocols as decided by RecyClass TC representatives in the Letter of Agreement and must be conducted by an independent Testing Facility recognised by RecyClass which has no legal affiliation to the Applicant. In the case testing started without the Letter of Agreement, RecyClass reserves the right not to accept the application, or to ask to redo the test.

8.5 COSTS

RecyClass charges a management fee of 2500 € for the Recyclability Approval process, which must be paid by the Applicant after the reception of the Laboratory Evaluation Report. For Applications following the Annex 3 procedure, the RecyClass management fee is reduced to 1500 €. This 1500€ fee applies to Recyclability Evaluations performed according to the following RecyClass Recyclability Evaluation Protocols:

- RecyClass Recyclability Evaluation Protocol for Labels & Adhesives applied on PET bottles.
- RecyClass Recyclability Evaluation Protocol for Laminating Adhesives applied on PE films.

⁸ [Lists of TC Representatives](#)

⁹ [RecyClass Recyclability Evaluation Protocols](#)

- RecyClass Recyclability Evaluation Protocol for Labels & Adhesives applied on HDPE containers.

The RecyClass management fee must also be paid if the Applicant is asking to withdraw its application after testing in a recognised Testing Facility. However, the management fee does not include any costs related to the performance of the testing in a recognised Testing Facility based on the Recyclability Evaluation Protocols. The cost of laboratory testing will be communicated directly to the Applicant by the selected Testing Facility.

Members of RecyClass benefit from a special quote for the testing costs, as issued by the recognised Testing Facilities.

In the case of an innovation previously tested in a RecyClass test campaign (Annex 3), the Applicant will also need to contribute the cost of the Recyclability Evaluation performed during the independent test campaign to RecyClass in order to be allowed to get a Laboratory Evaluation Report in the name of the Applicant. To ensure transparency, RecyClass will present to the Applicant the cost of the test campaign, and the repartition of the cost among the different samples tested.

8.6 LABORATORY EVALUATION REPORT

The Applicant commits to disclose all test results with RecyClass within the Laboratory Evaluation Report that will be provided by the corresponding Testing Facility. The anonymised Laboratory Evaluation Report will be made available to RecyClass Team and TC who will assess the compatibility of the technology within collection and sorting schemes and determine its suitability with a determined recycling stream in Europe. In the case of an innovation previously tested in a RecyClass test campaign (Annex 3), the Testing Facility must release a new anonymised report in the name of the Applicant replacing RecyClass independent report.

The Laboratory Evaluation Report will be shared with RecyClass under the conditions established in the NDA with the Applicant. RecyClass reserves the right to ask for modifications before submission to the corresponding Technical Committee. These modifications must not change the outcome of the test neither the results presented, except evidence of typo. In this case, the applicant will be informed.

The Laboratory Evaluation Report shall include:

- Executive Summary
- Product description
- Test design
- Research facility & contact person
- Detailed description of input material & sample preparation
- Material & equipment used
- Process conditions
- Test results & remarks (including repeatability)
- Further comments
- Summary

Note that the evaluation of the Laboratory Evaluation Report is not based on an automatic scoring table assigning a score to each property or analysis depending on their results. Since an innovation can have multiple impacts on the recyclability of a material and on the evolution of its properties, it is necessary to have a general overview of the Laboratory Evaluation Report to properly assess the recyclability, thus not permitting the use of a general formula in this assessment.

8.7 REPORT EVALUATION AND FINAL ASSESSMENT

8.7.1 TC EVALUATION

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The TC reviews all Laboratory Evaluation Reports and any other relevant information provided by the Applicant. The TC provides guidance for the interpretation of the results of the performed tests. If the results are inconclusive, the TC may request to perform further testing in order to issue an Approval Letter.

All documentation (except the application form) provided by the Applicant will be discussed between TC representatives who have access to confidential information related to the specific application as set in the NDA signed with the Applicant.

The Final Assessment delivered by the TC is based on a technical evaluation of the Laboratory Evaluation Report and the documentation provided by the Applicant. The Applicant will have the possibility to directly present the Laboratory Evaluation Report to the TC.

The TC issues an Approval Letter containing a technical review and summary of the evaluation results, conclusions, and recommendations to be submitted to the SB. In case of a positive recommendation, the Approval Letter can be paired with a proposal for external communication.

8.7.2 SB APPROVAL

The SB reviews the recommendations and the communication proposals of the TC and validates the Approval Letter. The RecyClass Team will communicate the SB's decision to the TC.

In the event of disagreement between the SB and TC for a final recommendation, the Final Assessment will be returned to the TC including remarks from the SB. After that, the TC will meet again and may invite the Applicant and/or Testing Facility performing the test to participate and provide additional information regarding the packaging product or innovation material tested. The Final Assessment with clarifications is sent to SB again for validation.

RecyClass Team ensures communication of the Final Assessment to the Applicant.

8.8 APPROVAL & NON-APPROVAL LETTER

The Approval or Non-Approval Letter is drafted by the RecyClass Team with the SB validation. The document includes an overview of the technical review provided by the Laboratory Evaluation Report and the TC assessment, as well as the conclusions regarding the recyclability of the concept product or innovation material. In addition, it includes recommendations and next steps.

The Approval or Non-Approval Letter determines the recyclability of the tested packaging or packaging technology and therefore the category within which the tested innovation is included according to the Design for Recycling Guidelines¹⁰

- **Fully compatible** – Plastic packaging compatible with state-of-the-art industrial recycling processes. Design solutions readily accepted by sorting centres and recyclers since the majority of the industry has the capability to identify, sort, and process a product exhibiting this feature with none or minimal negative effect on the operation or final product quality. Products with these features are likely to pass through the recycling process into the most appropriate material stream with the potential of producing high quality material.
- **Limited compatible** – Plastic packaging slightly negatively impacting the sorting/recycling process and/or the quality of the recycle but still compatible with state-of-the-art industrial recycling processes. Design solutions that present known technical challenges for sorting centre or recycling operations, yield or final product quality, but are reluctantly tolerated and accepted by the majority of sorting centre and plastics recyclers.

¹⁰ [RecyClass Design for Recycling Guidelines](#)

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- **Non-compatible** – Plastic packaging not compatible with state-of-the-art industrial recycling processes. Design solutions with a significant adverse technical impact on the sorting centre or recycler's operations, yield, or final product quality. The majority of sorting centre or plastics recyclers cannot remove these features to the degree required to generate a marketable end-product.

8.8.1 APPROVAL LETTER

RecyClass provides the applicant with an Approval Letter, containing the following information:

- Disclaimer on the scope and use of the Approval Letter
- Overview of assessment process
- Impact on existing collection & sorting schemes
- Impact on the concept packaging or innovation material on recycling process
- Decision of RecyClass
- Recommended Communication through RecyClass
- Next steps (if required)
- Class ranking (for Product approvals only)
- Annex illustrating the technology or product

The Applicant may review the content of the Approval Letter before final approval by the SB. Any proposed amendments must be in line with the TC conclusions and recommendations.

RecyClass Team sends the Approval Letter to the Applicant. RecyClass Team offers the Applicant the opportunity to discuss the Laboratory Evaluation Report and provide suitable solutions to increase the recyclability of the innovation material or concept packaging if applicable. RecyClass has access to state-of-the-art knowledge, information, and expertise of the plastics recyclers in Europe.

RecyClass reserves the right to change the result of the Approval Letter at any time, with prior notification to the Applicant by using updated technology, assessments, or experience.

Note that the Approval Letter does not have an expiring date and remains valid as long as the innovation is unchanged. The Approval Letter can be published or shared only in its entirety, and in any case all the conditions related to the approval have to be communicated. Moreover, the Approval Letter can be used only to promote the technology, or the product approved by RecyClass and cannot under any circumstances be used to promote technologies or products not tested and positively evaluated by RecyClass.

8.8.2 NON-APPROVAL LETTER

In case the TC representatives agreed on a non-compatibility of the technology or product with recycling, RecyClass provides the applicant with a confidential Non-Approval Letter, containing the following information:

- Overview of assessment process
- Impact on existing collection & sorting schemes
- Impact on the concept packaging or innovation material on recycling process
- Decision of RecyClass
- Technical reasons of the decision
- Potential design improvement to get an Approval Letter

RecyClass Team can offer the possibility to the Applicant to have a meeting with the TC representatives in order to better understand the decision and evaluate future design improvements. This meeting should not be used to try to change and influence the TC representatives' decision. The Applicant may review the content of the Letter before final approval by the SB. Any proposed amendments must be in line with the TC conclusions and recommendations and must be approved by the TC representatives. The Non-Approval Letter is not communicated to the TC members apart from the representatives and will not be communicated out of RecyClass Team, TC representatives and SB.

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8.9 EXTERNAL COMMUNICATION

If the Approval Letter results are positive, RecyClass publishes the Approval Letter on the RecyClass website in order to report publicly the new findings and the laboratory testing. Any form of communication shall be approved by the SB and the Applicant. Communications can be made available via the RecyClass website and social media accounts. Use of the positive opinion by the Applicant for marketing and communication purposes is subject to conditions and restrictions, in order to be aligned with RecyClass Use of Claims Guidance¹¹.

8.9.1 APPROVAL LETTER

The Approval Letter in the case of a positive result must be published on RecyClass website. The timing should be discussed and agreed with the Applicant.

8.9.2 RECYCLASS DESIGN FOR RECYCLING GUIDELINES

RecyClass Design for Recycling Guidelines provide guidance to plastics players and propose the most effective design solutions to facilitate the recycling of packaging.

Information gathered in the Final Assessment will be used to verify or modify the information contained in the RecyClass Design for Recycling Guidelines.

8.9.3 PRESS RELEASE

RecyClass may publish a press release to communicate on positive results of the Approval Letter. The press release must be approved by the SB and the Applicant. In case the applicant is publishing a press release, this document must be shared with RecyClass previously. RecyClass Team will validate the wording and the claims in such a document, in order to be aligned with RecyClass Use of Claims Guidance¹².

8.9.4 COMMUNICATION BY THE APPLICANT REFERRING TO RECYCLASS'S TEST RESULTS

The Applicant must refer accurately to all conditions and results described in the Approval Letter.

9. SUSPENSION OR WITHDRAWAL OF APPROVAL

9.1 SUSPENSION OR REVOCATION BY RECYCLASS

Suspension of an Approval is a measure intended to protect the integrity of the Approvals. RecyClass may suspend an issued Approval when one of the following cases occurs:

- Non-conformities are found in the application form and reported in the Approval Letter.

¹¹ [RecyClass Use of Claims Guidance](#)

¹² [RecyClass Use of Claims Guidance](#)

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- Non-conformities are found in the samples composition tested by the Testing Facility.
- Mandatory corrective actions defined in the Approval Letter have not been adapted within the specified timeframe.
- Improper use of the Approval Letter arises (for example miscommunication to promote technologies or products not tested and successfully evaluated by RecyClass).
- Non-conformities are found regarding the followed test procedure.
- Presence in the innovation of a substance legally banned in EU

RecyClass will notify the Applicant of the suspension of the Approval. 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 logo already on the market
- Conditions to be fulfilled by the Applicant for lifting the suspension within a 3-month period or the immediate revocation by the SB.

Approval may be revoked when mandatory corrective actions were not fulfilled within the specified period, or when the suspension of an Approval had no effect. RecyClass may also revoke an Approval directly.-In case of revocation of the Approval, RecyClass must request the Applicant to remove all corresponding communications. If considered appropriate, RecyClass may request a quality control check of the analysed innovation and blends and launch an investigation to determine if there is reason to suspend or revoke the Approval.

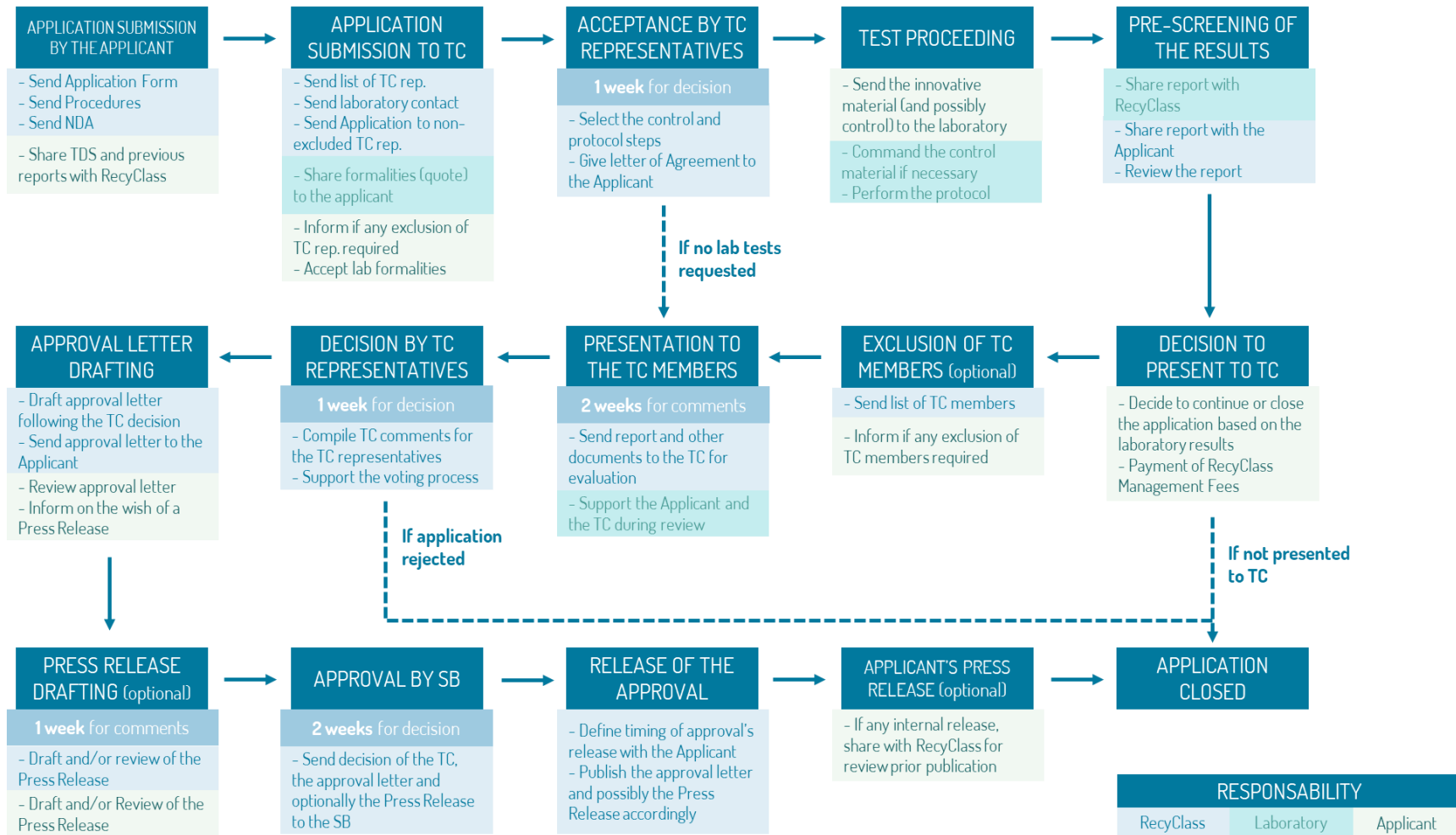
9.2 WITHDRAWAL BY THE APPLICANT

The Applicant can decide to withdraw an Approval under specific circumstances. To start such procedure, the Applicant must officially write to RecyClass a request to withdraw the Approval including the reason for the withdrawal. The withdrawal needs to be approved by RecyClass SB. Starting from the validation from the SB, the Approval Letter is no longer valid and must be removed from the list of Approvals on RecyClass website. In case of withdrawal of the Approval, RecyClass must request the Applicant to remove all corresponding communications.

Withdrawal of an Approval is definitive. In case the Applicant would like to re-approve the same innovation, a standard Recyclability Approval procedure needs to be followed.

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ANNEX 1 – Approval Procedure Scheme



ANNEX 2 – Complementary Procedure for Technologies & Products Approved by APR

This complementary procedure applies only to Applicants who already got their technology or product recognised by the Association of Plastics Recyclers. To follow this procedure, the Applicant must provide to the RecyClass Team the recognition letter obtained from APR as well as the Laboratory Evaluation Report obtained from one of the APR recognised Testing Facilities.

Based on collaboration between APR and RecyClass and due to the similarities between the protocols developed by both organisations to assess the compatibility of specific packaging design with recycling, RecyClass may acknowledge results obtained following APR protocols. Extension of the recognition will mainly depend on the APR protocol performed: **the Application guidance** or **the Critical guidance**.

If the Applicant followed **the Critical guidance**, additional laboratory testing will be required to cover the mandatory conversion step of RecyClass Recyclability Evaluation Protocol. In that case, the Applicant has the choice to perform these additional tests in the Testing Facility that performed APR testing or in one of RecyClass Recognised Testing Facilities. If not possible, the Applicant will need to go through the full Recyclability Evaluation Protocol of RecyClass.

If the Applicant followed **the Application guidance** – that includes the converting step – the TC representatives keep the right to ask for additional testing in case of severe deviations compared to RecyClass Recyclability Evaluation Protocols. If no additional tests are required, the Applicant will be able to directly present the Laboratory Evaluation Report to RecyClass TC.

Note that this procedure will not affect the delivered Approval Letter and will be considered equivalently to any other Application.

ANNEX 3 – Specific Procedure for Innovation tested during RecyClass independent Test Campaign

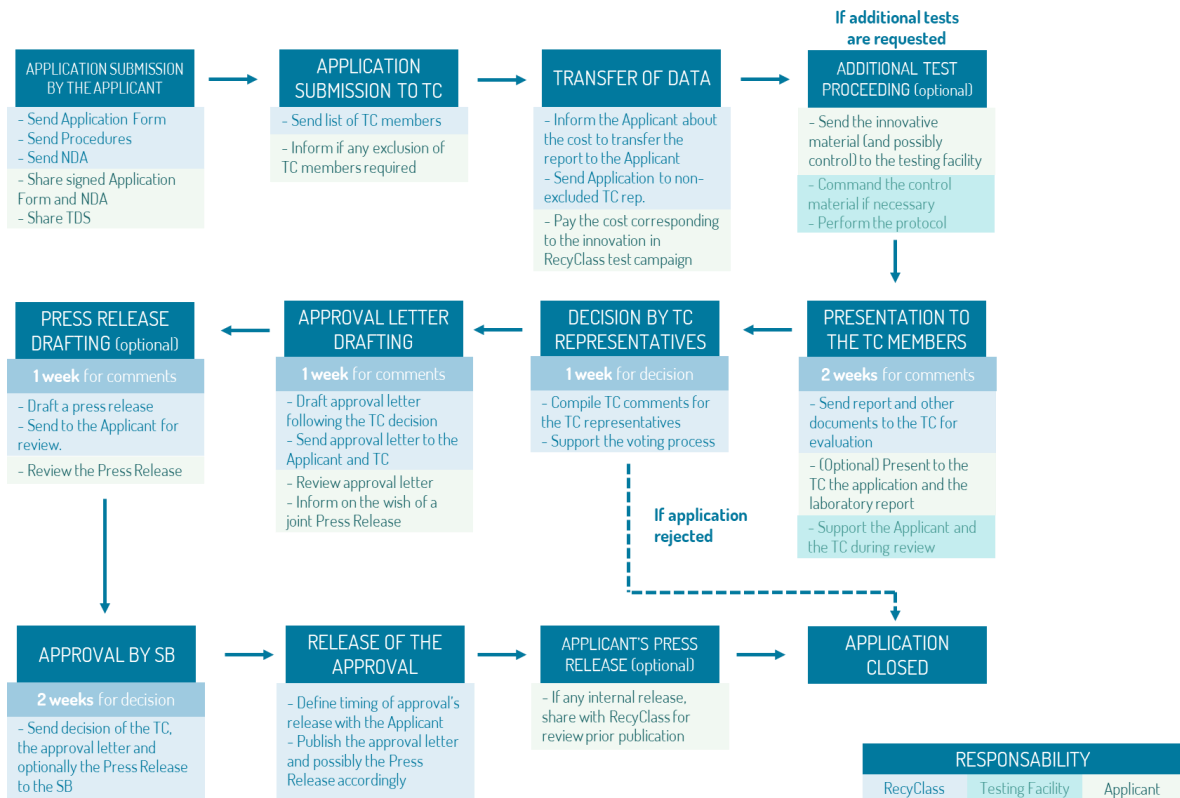
This specific procedure applies only to Applicants who already got **their innovation tested during an independent Test Campaign commissioned by RecyClass**. To follow this procedure, the Applicant must provide to the RecyClass Team a written request to get an Approval Letter for one or several innovations tested in previous RecyClass test campaigns. All the conditions, listed here after, need to be fulfilled to be eligible for this procedure:

- RecyClass test campaign needs to be closed by the corresponding TC.
- RecyClass test campaign, where the innovation was tested, followed the standard Recyclability Evaluation Protocol.
- If several companies were involved in the development of the innovation, all parties need to agree on applying for a Recyclability Approval.

Despite the fact that the innovation was tested during previous test campaign, the Applicant must complete the Application Form detailing the innovation material or packaging to be approved. The Application will be communicated to the TC when the Applicant will have contributed the testing cost of the related sample in the corresponding test campaign to RecyClass. Note that, in addition to the tests already done, RecyClass can ask for additional tests, such as sorting, prior to sharing the Application with the TC members. From the reviewing of the report by the TC, the process is identical to a common Recyclability Approval. RecyClass management fees also applied for this specific procedure.

Note that the outcome of the test campaign, and the level of compatibility of the innovation reported in the Approval Letter may be different, as they are respectively based on a general assessment of multiple samples and a single Recyclability Evaluation.

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DOCUMENT VERSION HISTORY

VERSION	PUBLICATION DATE	REVISION NOTES
3.4	December 2024	<p>RecyClass rights to refuse a report not performed under the condition of the Letter of Agreement</p> <p>RecyClass team can ask modifications or corrections of the report</p> <p>Limitation on TC Representatives exclusions</p> <p>Modification of conditions to present innovation to the TC</p>
3.3	March 2024	<p>Anonymisation of the Recyclability Evaluation Process for the TC consultations</p> <p>Removal of TC consultation for Approval Letter review</p> <p>Modifications RecyClass Management Fees</p> <p>Alignment of Annex 1 based on procedure modifications</p>
3.2	January 2024	<p>Removal of free management fees for RecyClass Platinum members</p> <p>Modification of procedure related to external communication</p>
3.1	March 2023	<p>Addition of a procedure to withdraw Approvals</p> <p>Addition of a Specific Procedure for Innovation tested during RecyClass independent Test Campaign</p>
3.0	January 2023	<p>Document renamed “Recyclability Approval Process – Quality Management & Procedures”</p> <p>Technology/Product Approvals renamed “Recyclability Approvals”</p> <p>Addition of Non-Approval Letter procedures</p> <p>Clarification of RecyClass management fees</p> <p>Editorial revision of the text in the document</p>
2.6	September 2022	<p>Renaming Recognised Laboratories to Recognised Testing Facilities</p> <p>Clarification regarding TC members exclusion policy.</p> <p>Flowchart in annex 1 adapted regarding press release.</p>
2.5	May 2022	<p>Addition of potential pre-screening and additional tests (sorting, QT procedures) to the Application process</p>
2.4	March 2022	<p>Time for comment on Approval Letter and Press Release by the TC reduced to 1 week</p> <p>Management fees to be paid at the reception of the laboratory report</p>

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2.3	January 2022	Minor revisions on figures and TC members exclusion policy Addition of the Annex 2 for Applications coming from APR Addition of the Letter of Agreement Renaming Accredited Laboratories into Recognised Laboratories
2.2	September 2021	Separation of the internal procedures and Technology/Product Approval Process. Release of the Technology/Product Approval – Quality Management & Procedures

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