

RecyClass

GUIDANCE FOR AUDITORS & AUDIT CHECKLIST

RECYCLED PLASTICS
TRACEABILITY CERTIFICATION

RECYCLED PLASTICS

CONTENT

1.	Introduction.....	3
2.	Object of Conformity	3
3.	Operating Performance Requirements.....	3
4.	Sampling of Products	4
5.	Non-Conformities	4
6.	Auditing Overview.....	5
7.	Extension or Changes affecting Certification	6
8.	Checklist	7
9.	Volume Reconciliation.....	15
10.	Recycled Content Calculation	15
11.	Annex Circular Plastics Alliance	16
12.	Annex I: Definitions	20
13.	Annex II: Table of Changes.....	23

1. INTRODUCTION

The following guidance provides direction to auditors to complete the audit evaluation according to the Recycled Content Traceability Certification Audit Scheme (version 2.0).

CBs must gather all necessary information and documentation during the audit assessment in order to verify that the information provided by the applicant is correct and complete. The production process and quality management systems are assessed according to the audit requirements which ensure product conformity.

The Certification covers a wide range of company processes and operations which are part of the recycled plastics value chain and might require an adaptation of the audit evaluation in order to verify compliance with the Certification principles of traceability and recycled content calculation (requirements).

CBs must define the type of products, type of process and the boundaries of the site and process under the scope of the audit.

2. OBJECT OF CONFORMITY

The Certification enables all actors of the plastics value chain to demonstrate a transparent use of recycled plastics within products. The conformity assessment focuses on the traceability of recycled plastics within a process and the verification of the declaration of a certain percentage of recycled content of plastics in products.

The Certification is available to all actors of the value chain who are involved in the use of recycled plastics. Processes can be divided into two different types:

- Process where there is mixing. E.g. converter, compounder,
- Process where there is no mixing. E.g. trader, warehouse, filling company

3. OPERATING PERFORMANCE REQUIREMENTS

The auditing criteria is standardised in two categories which define the level of importance and accuracy of each requirement needed to succeed in obtaining the certification.

Category type	Meaning
1	Compulsory requirement. Object of conformity must achieve the required standard for type 1 categories in order to achieve <i>Certification</i> . Minor discrepancies are allowed in defined circumstances.
2	Preferred requirement. Object of conformity must achieve a 50% compliance with category 2 items.

4. SAMPLING OF PRODUCTS

The CB must select a representative sample of products assessed during the audit. Normally, at least 2 samples per process or line should be selected to consider the sample representative. Samples should be chosen randomly from different families of products. Additionally, sampling should consider products made with different input materials.

Normally, the CB can assess up to 5 samples of products during an on-site audit day. The duration of the audit can be adapted depending on the size of the site, complexity of the process or number of samples to be assessed.

5. NON-CONFORMITIES

Non-conformities are issued when there is a failure to comply with an audit scheme requirement. Non-conformities are described in two different categories:

- **Major non-conformities** affect the overall capability of the applicant to comply with the audit scheme requirements. There is a significant doubt that an effective process control is in place or recycled content traceability for products cannot be established. Non-compliance with more than 50% of category 2 requirements will constitute a major non-conformity.
 - **Major non-conformities of category 1** requirements will result in a suspension of the audit procedure. The applicant will be notified with the corrective actions to be implemented within a period of 3 months to resume the audit evaluation on-site or where possible via documentation exchange or other means such as video connection. This will be aimed at verifying the correct implementation of the corrective actions. If corrective actions are not implemented satisfactorily, the CBs may close the audit procedure.
 - **Major non-conformities of category 2** requirements will be noted as observation. When non-conformities represent more than 50% compliance with category 2 requirements, non-conformities should be resolved within a certain period of time up to 6 months to be determined by the CB. Evaluation of the implementation of corrective actions is possible via documentation exchange or other means such as a video connection. CBs must decide if the corrective actions were correctly implemented to close the audit procedure.
- **Minor non-conformities** do not affect the overall capability of the applicant to comply with the audit scheme requirements.
 - **Minor non-conformities of category 1 requirements** will be noted for rectification within a defined period of time up to 3 months to be determined by the CB.
 - **Minor non-conformities of category 2 requirements** are noted as observation.

Category type	Major non-conformity	Minor non-conformity
Category 1 requirements	Corrective actions in maximum 3 months to continue the audit.	Corrective action in maximum 3 months.
Category 2 requirements	Observation (not mandatory). Corrective action in maximum 6 months in case of non-compliance with more than 50% of the requirements. Verification is needed.	Observation (not mandatory).

6. AUDITING OVERVIEW

Please review the audit procedure as described in section 9 of the Quality Management Systems and Procedures document.

In the beginning of the audit evaluation, the CB must:

- Ensure that the applicant has a good understanding of the audit procedure and requirements at the beginning of the process. CBs must provide sufficient information to the applicant regarding the documentation to be requested, audit procedures and timings.
- Schedule a meeting with the relevant personnel of the applicant in order to present the Certification Scheme and understand the set up of the organisation, boundaries and description of the process. This first meeting establishes a mutual trust between CB and applicant.
- Request documentation, please see section 9 of the document “Quality Management & Procedures”.

Prior to the on-site audit the CB must:

- Sign the NDA and Certification Agreement with the applicant.
- Complete the documentation review successfully.

During the on-site audit the CB must:

- Inspect the site and verify the veracity of the information provided by the applicant during the documentation exchange.
- Check and document traceability of products throughout the different stages of the process from reception of input materials to the finished outputs.
- Carry out and document a mass balance/volume reconciliation to verify that the quantities of products made and the relative percentages of recycled material used are compatible with the raw materials used, taking into account the losses incurred during all stages of the process.

After the on-site audit the CB must:

- Note down any non-conformities found in the audit report with corresponding corrective actions
- Detail the audit findings in the audit report.

- Share the draft audit report with the applicant.

7. EXTENSION OR CHANGES AFFECTING CERTIFICATION

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

When the applicant would like to extend the scope of the conformity assessment, add or remove products or change the share of recycled content in a certified product, this must be communicated to the Certification Body to amend the Certificate.

Expansion of the Certification to new products or changes in the percentage of recycled content will require the Certification Body to check new recipes, product data sheet(s) and production records for one (or more) batches of production.

In case of use of Recycled Plastics from new suppliers, Certification Body must check Supplier's Certificate (in case of a EuCertPlast audit Annex 4 must be available), documents about the purchased recycled input use, production records, plausibility check regarding the output produced and recycled input used. Certification Body must also request pictures of the Recycled Input in stock with labels.

8. CHECKLIST

Note for the auditors before filling in the Audit Checklist:

- There are X sections in the checklist. Depending on the type of operation/process audited, not all sections are relevant. This is indicated.
- Auditors are requested to indicate conformity with requirements (y/n) and note down non-conformities found in the non-conformities column of the Audit Report Checklist. Findings should be detailed in the corresponding section of the Audit Report.
- Overview of non-conformities should be listed in the non-conformities section. Corrective actions where applicable should be recommended as well.
- Whenever possible use SI system for units.

Requirement	Documents / Evidence	Action / Verification	Category Type	Type of process or operation	Non-conformities identified	Evidence Taken
1.0 Quality System Requirements						
1.1 Business Registration	1. Company registration document	Check that business registration and licenses are in place. Identify and document names of top management.	1		Minor non-conformities are NOT allowed	
1.2 Quality Management System	1. Documented management system 2. ISO 14000; ISO 9001 Certificate; EMAS	Check that there is evidence of a documented management system for the product, group of products and process which is subject to certification/which is being evaluated. This system should follow the main principles of ISO 9001:2015. Check if the applicant has a valid certificate for ISO 9001:2015 or EMAS. Verify the associated report and ensure that the conformity assessment results relate to the products and processes subject to certification. Identify that the issuing Certification Body is accredited according to ISO 17021.	2		Minor non-conformities allowed	

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Requirement	Documents / Evidence	Action / Verification	Category Type	Type of process or operation	Non-conformities identified	Evidence Taken
1.3 Training	1. Training programmes 2. Signature Lists	Check that personnel is receiving appropriate training according to their responsibilities. Check that training programmes are periodically reviewed.	2		Minor non-conformities allowed	
1.4 Register of complaints	1. Register of complaints 2. Register of complaints procedure	Check that there is a register of complaints present. Check that there are designated personnel for this task.	2		Minor non-conformities allowed	
1.5 Records	1. Evidence of records	Check that documentary evidence is recorded in relation to the process and product conformity.	1		Minor non-conformities allowed	
1.6 Quality Assurance	1. Internal records	Check that records of quality controls carried out throughout the process are available.	2	This is not applicable for trading or storing operations.	Minor non-conformities allowed	
1.7 Communication about conforming products	1. Internal records	In case of a monitoring audit, check that any identification, marking and marketing of conforming products in accordance with certification requirements are correctly monitored, documented and communicated with the issuing Certification Body.	2		Minor non-conformities allowed	
2.0 Supplier Evaluation						

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Requirement	Documents / Evidence	Action / Verification	Category Type	Type of process or operation	Non-conformities identified	Evidence Taken
2.1 Supplier Identification	1. Supplier identification 2. Supplier's Certificate	<p>Check that there is a system in place that documents information on the suppliers of recycled plastics:</p> <ul style="list-style-type: none"> - Name and address of the supplier - Code and validity period of the Supplier's Certificate - Description of Certified Recycled Input provided - Purchasing documentation of Certified Recycled Input <p>During an initial audit, check that suppliers of Recycled Input have a valid, recognised Supplier's Certificate in place. Suppliers of Recycled Input should have a Supplier's Certificate for at least two thirds of the Recycled Input. <i>E.g. Applicant makes 100% PCR products. They receive equal amount of Recycled Input from 12 different suppliers. In that case, at least 8 suppliers need to hold a valid Supplier's Certificate. The Certificate will state that the products contain 100% PCR content.</i></p> <p>This percentage will be increased to 75% during the 1st monitoring audit, and 100% during the 2nd monitoring audit.</p> <p>After this period, Recycled Input from non-certified sources (Uncontrolled Recycled Input) must be deducted from the recycled content calculation.</p>	1		Minor non-conformities allowed	Copy of EuCertPlast Certificate; Summary Sheet and Annex 4 where list of Certified grades can be found.
2.2 Input Records	1. Incoming load report 2. Supplier's Certificate and documentation	Check that the supplier's name is shown against each incoming Batch of Recycled Input. Where relevant, check that the supplied Recycled Input is covered under the supplier's Certificate.	1		Minor non-conformities allowed	
3.0 Input Requirements						

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Requirement	Documents / Evidence	Action / Verification	Category Type	Type of process or operation	Non-conformities identified	Evidence Taken
3.1 Purchase specifications	1. Purchase specifications	Check specifications related to Recycled Input purchased and referenced on the incoming load log. Verify that Production Code is detailed on the purchase specification and/or shown on the incoming load log.	1		Minor non-conformities are allowed	
3.2 Weights & dates of delivery recorded	1. Incoming load report	Check that net weight and date for each incoming <i>Batch of Certified Recycled Input</i> are recorded. If material is not weighted, overview of documentation is recorded.	2		Minor non-conformities are NOT allowed	
3.3 Origin, source, sector and type of Recycled Input	1. Purchase specification 2. Supplier's Certificate	Check and document the origin of the material (pre-/post-consumer) declared in the purchase specification. If available, check and document the source of the material (e.g., household, commercial, industrial, etc.), sector (Agriculture, Building & Construction, Packaging, WEEE, Automotive) and the type of product application (e.g. PET trays, bottles, HDPE containers) declared in the purchase specifications. Check that these statements are supported by the supplier's Certificate.	1		Minor non-conformities are allowed	
4.0 Stock management						
4.1 Stock Identification	1. Product Code	Check that Recycled Input is identifiable by a Product Code. Inspect how Recycled Input and Outputs are stored: <ul style="list-style-type: none"> - Visibly marked storage areas - Big Bags (origin labelling required) - Silo assignment; ensure that composition of the silo is known and filling and emptying of the silo can be monitored. 	1		Minor non-conformities are NOT allowed	
4.2 Storage conditions	1. Storage area	Inspect that the storage area is in good conditions; closed and/or covered.	2		Minor non-conformities allowed	
4.3 Stock Management System	1. Stock management system	Check and document there is always a system that records input and output of stock. Confirm it covers Recycled Input, withdrawals and Outputs.	1		Minor non-conformities are NOT allowed	

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Requirement	Documents / Evidence	Action / Verification	Category Type	Type of process or operation	Non-conformities identified	Evidence Taken
4.4 Stock Checks	1. Stock check report	Confirm there is a physical inspection of stock at least once a year.	1		Minor non-conformities are NOT allowed	
5.0 Process						
5.1 Process Overview	1. Process schematic 2. Process description	Inspect the process via directly examining the production line (when relevant) and documentation and communicating with relevant personnel. Provide an schematic overview and describe the process subject to evaluation and its boundaries.	1		Minor non-conformities are allowed	
5.2 Incoming Recycled Input Records	1. Incoming load report for the last 12 months	Check that Recycled Input documentation for the past 12 months (separated per input streams, if materials with different PCR-contents are processed) is available. If no separate documentation per product is used, the lowest proportion of recycled material must be used for the entire production.	1	This is not applicable for trading or storing operations.	Minor non-conformities are allowed	
5.3 Subcontracted Processing Input Records	1. Report of Recycled Input (by type) sent to third parties for processing for the last 12 months.	Check that Subcontracted Processing sent to third-parties documentation is available for the past 12 months.	1	This is not applicable for trading or storing operations.	Minor non-conformities are NOT allowed	
5.4 Input & Output Records	1. Recycled Input load report; 2. Output load report 3. Report detailing additives, fillers masterbatches, virgin, etc. added into the production process; 4. Rejection records;	Confirm sufficient data records are stored for the last 12 months. Production records are stored for each Output. Rejects amounts are recorded.	1	This is not applicable for trading or storing operations.	Non-conformities are not allowed.	
5.5 Production Process Records	1. Production records	Check that production records are available for the last 12 months. Review the production records to ensure they are sufficiently complete, detailed and accurate. Check the frequency and quality of the recording.	1	This is not applicable for trading or storing operations.	Minor non-conformities are NOT allowed	

Requirement	Documents / Evidence	Action / Verification	Category Type	Type of process or operation	Non-conformities identified	Evidence Taken
5.6 Metrology of test equipment	1. Metrology of test equipment 2. Procedure to record deviations and corrective actions	Check that there is a procedure in place to control and calibrate test equipment regularly. Verify that there is a procedure in place to record deviations and implement corrective actions.	1	Requirement not applicable for trading or storing operations.	Minor non-conformities are NOT allowed	
5.7 Volume reconciliation	1. Volume reconciliation	<p>Perform and document a volume reconciliation for the process for the period of the previous 12 months starting up to 2 months before the date of the audit.</p> <p>Verify that the quantities of output products with a certain percentage of recycled plastics correspond to the input materials used, taking into account the losses incurred during the process or operation.</p> <p>When applicant has limited production throughout the year (on demand production) check that specific consumptions reflect the recipes and focus the efforts on the plausibility check. At least data for at least 3 batches should be available to validate the recipes through consumption figures.</p>	1		Minor non-conformities are allowed	
5.8 Traceability	1. Incoming load report 2. Stock management system 3. Production records	<p>During the evaluation, select a representative sample of the products to be certified. Check and document the traceability of Recycled Plastics throughout the process according to EN 15343:2007. Confirm that sufficient records are kept and adequate steps are implemented to ensure traceability throughout the entire process.</p> <p>If production machinery is part of the process, verify that set-up corresponds to the products formulations. Inspect the physical production of one or more products part of the evaluation. If this is not possible, check the input and output in stock and verify the data with the records.</p>	1		Minor non-conformities are NOT allowed	
6.0 Output Composition						

Requirement	Documents / Evidence	Action / Verification	Category Type	Type of process or operation	Non-conformities identified	Evidence Taken
6.1 Output Specifications	1. Product description	Check that product specifications are available (colour, polymer type, etc.). CBs must complete this section during the on-site audit.	1	This is not applicable for trading or storing operations.	Minor non-conformities are NOT allowed	
6.2 Output description	1. Product description	Provide a list and description of the Products, Components or Families of Products: <ul style="list-style-type: none"> - Product code and name - Polymer - Application - Weight, shape and size - Recycled content 	1		Minor non-conformities are allowed	
6.3 Calculation of Recycled Content	1. Production records 2. Bill of material (BOM) 3. Formulation 4. Production Records	The following data are required for calculation: <ul style="list-style-type: none"> - Piece weight, component weights - Formulation (used additives, fillers, master-batches, virgin material) - Shares of Recycled Content - Recycled Input used 	1		Minor non-conformities are NOT allowed	
6.4 Plausibility Check	1. Product formula 2. Production records 3. Shift journals 4. Recycled Input invoices, delivery notes, weighing certificates, etc.	Check and document if the consumption data specified in the production records is in line with the proportion of Recycled Content. Check the quantity of Recycled Input used and Output produced considering the purchases and consumption figures. Consider any stock changes and rejects. Verify that: $(\text{Purchases (t)} - \text{Stock (t)}) > \text{Consumption (t)}$	1		Minor non-conformities are allowed	
7.0 Output Requirements						
7.1 Output Specifications	1. Sales report	Check the following are recorded: <ul style="list-style-type: none"> - Details of the customer whom Products <i>are</i> sold - Weight or number of pieces 	2		Minor non-conformities are NOT allowed	
7.2 Sales Records	1. Invoices	Check a representative sample of invoices to ensure they match the sales report.	2		Minor non-conformities are NOT allowed	

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Requirement	Documents / Evidence	Action / Verification	Category Type	Type of process or operation	Non-conformities identified	Evidence Taken
8.0 Subcontracting						
8.1 Control of Subcontracted Processing	1. Subcontracted Processing records	Check to ensure the following are recorded: <ul style="list-style-type: none"> - Organization used for Subcontracted Processing - Date of shipment - Grade of and Origin of Waste of Recycled Input supplied 	1		Minor non-conformities are NOT allowed	
8.2 Subcontractor's Certificate	1. Subcontracted Processing records	Check against the register of recognised Certifications that the producers supplied with Recycled Input are certified.	1		Minor non-conformities are NOT allowed	

9. VOLUME RECONCILIATION

CBs must perform and document a volume reconciliation of the process in the Audit Report. Through the volume reconciliation, the CB will be able to verify that the quantities of Recycled Input used correspond to the quantity of output produced, considering the losses throughout the process.

In a continuous production (stock production), the calculation should consider all flows involving the Recycled Input for a period of 12 months. The applicant must provide a monthly mass balance overview of the process for the CB to verify. Verification should be done in depth for at least 1 month.

When production records are available for a shorter period of time due to short production periods (on demand production), the Certification Body must focus on the plausibility check, the validation of the recipes through consumption figures of at least 3 batches and the calculation of recycled content verification.

Output may be accounted for in tons (t) or in number of products.

10. RECYCLED CONTENT CALCULATION

CBs must verify the recycled content in conforming output products. The calculation of the pre-consumer and post-consumer share in different products or families of products must follow the following formula in line with EN 15343:2007:

$$x (\%) = \frac{A}{P} \times 100$$

X is the *Recycled Content*, expressed as a percentage;

A is the mass of *Recycled Input*;

P is the total plastic mass of a product or component.

In the formula, X represents the share of pre-consumer or post-consumer material which should be reported separately if possible.

The calculation of the recycled content must be verified based on the production records.

The percentage of recycled content present must reflect the reality of the recycled content present in different products aiming for Certification for the period of evaluation. In case of variation of recycled content between batches, Certification Bodies should report the minimum percentage of recycled content. The ratio between different products should be known for the output products all the times for a determined volume.

The calculation shall consider the plastic weight of the product. Any Uncontrolled Recycled Input or other product ingredients (e.g., virgin plastics, additives, fillers, masterbatches, etc.) shall be deducted from the calculation. Non-plastic materials should NOT be considered in the calculation (e.g., inks, adhesives, coatings, barriers, metals, paper, etc.).

Scrap, off cuts or regrind which are non-waste cannot be counted towards the recycled content share. However, the recycled content of the scrap, off cuts or regrind which is being recirculated in a process will be inherently included. As an example,

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for clarification, if a production process uses pellets of 50% recycled content but has a 5% recirculation of internal scrap, the recycled content will still be 50% as the scrap material will have the same recycled content as the output. If that scrap, off cuts or regrind are used in other products, those other products will also contain 50% recycled content.

Recycled content is calculated per product, families of products or component depending on the process' production. In case of components, the communication of the percentage of recycled material both on the specific component or taking into consideration the final weight of the product. How to communicate the percentages of recycled content of conforming products can be found in the "Recyclability and Recycled Content Use of Claims Guidance".

11. ANNEX CIRCULAR PLASTICS ALLIANCE

In the following Annex it should be reported the tonnages to be reported to a CPA compliant Data Collector. This information will count towards the monitoring of recycling and uptake of recyclates in the EU. This is a voluntary initiative aimed only at converters (Data Generators) as described in the CPA Methodology which is described below:

converter [ISO 472:2.1685] Specialized operator capable of shaping plastics raw material to make a usable semi-finished or finished product.

CPA tonnages should be reported according to Traceability Level 1 or Traceability Level 2. More information about the differences can be found below. The Level of traceability is determined by the plastics industry per polymer type. This must be detailed in the Audit Report for clarity.

The data will be reported by the CPA Monitoring WG annually. Data Generators must provide tonnages information regarding the previous calendar year for which the Data Collector is gathering information. Two cases are possible:

- Audits taking place before the deadline to report to Data Collector:
 - ✓ The assessed period must comprise the full previous calendar year. E.g. Onsite audit takes place in May 2022. The assessed period for purposes of the CPA reporting must be January to December 2021. In this case the audit will verify the tonnages of the previous year which will be reported to the CPA by the Data Collector for the Reporting of the 2021 data.
- Audits taking place after the deadline to report to Data Collector:
 - ✓ The assessed period must comprise the current year to date. E.g. Onsite audit takes place in August 2022. The assessed period for purposes of the CPA reporting must be January to July 2022. In this case the audit will take place too late to verify the data of the previous year. However, the auditor can provide audited data from January to July. The applicant will still provide information for the full calendar year at the end of the year. In this case the audited percentage will be lower.

11.1 CONVERTER'S TOTAL INPUT

Verify the compiled information for the Converter's Input. The CPA definition for the **Converter's Input** is provided below:

The total weight of Recycled Plastic received / bought by a Converter in Europe and imported / delivered to the Converter from outside Europe, during the previous calendar year.

Information to be reported includes:

- The assessed period as defined above;
- Polymer type: include a different line for each polymer that the Data Generator is receiving;
- Country of origin*: specify the country in case of EU+UK or specify non-EU. This refers to the country where the material is coming from. This requirement is mandatory only for traceability **Level 2**. *All material coming from outside of the EU will be considered as generated outside the EU unless traceability information can be provided proving the origin of the material.
- Type of material: specify the tonnages which are pre-consumer or post-consumer. RecyClass definitions apply. If additional information is needed please check the CPA Guidance on waste definitions¹. This requirement is mandatory only for traceability Level 1.
- Sector of material: Specify the sector of the material: Building & Construction, WEEE, Agricultural, Packaging or Automotive. This requirement is only mandatory for traceability Level 1.



EXAMPLE:

Traceability Level 1.

Assessed period	Polymer type	Country of origin (EU+UK (specify country) or non-EU)	Type of material (Pre-consumer/ Post-consumer)	Sector of material	Tonnage (t)
e.g., 01/2021 – 12/2021	e.g., PET	e.g., Germany	e.g., Post-consumer	e.g., Packaging	e.g., 1,000
e.g., 01/2021 – 12/2021	e.g., PET	e.g., The Netherlands	e.g., Post-consumer	e.g., Packaging	e.g., 2,000
e.g., 01/2021 – 12/2021	e.g., PET	e.g., Belgium	e.g., Post-consumer	e.g., Packaging	e.g., 5,000
e.g., 01/2021 – 12/2021	e.g., PET	e.g., Belgium	e.g., Pre-consumer	e.g., Packaging	e.g., 3,000
TOTAL	e.g., PET	e.g. EU	-	-	e.g., 11,000
TOTAL	e.g., PET	e.g., non-EU	-	-	e.g., 0
TOTAL	e.g., PET	-	e.g., Pre-consumer	-	e.g., 3,000
TOTAL	e.g., PET	-	e.g., Post-consumer	-	e.g., 8,000
GRAND TOTAL PET	e.g., PET	-	-	-	e.g., 11,000
e.g., 01/2021 – 12/2021	e.g., HDPE	e.g., EU	e.g., Post-consumer	e.g., Packaging	e.g., 4,000
TOTAL	e.g., HDPE	e.g., EU	-	-	e.g., 4,000
TOTAL	e.g., HDPE	-	e.g., Post-consumer	-	e.g., 4,000
GRAND TOTAL HDPE	e.g., HDPE	-	-	-	e.g., 4,000

¹ CPA Guidance on Waste Definitions available at [DocsRoom - European Commission \(europa.eu\)](https://docsroom.europeancommission.eu)

GRAND TOTAL ALL	-	-	-	-	e.g., 15,000
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Provide information in the Audit Report regarding how the applicant presented the data and how it was verified that the information was plausible.

Keep in mind if any Converter's Input was supplied by a trader. If this is the case, keep in mind that traders and compounders are subject to the same information obligation as recyclers (according to either Traceability level 1 or 2).

If the plant has received any material which has been refused that is recorded. That material cannot be included in the reported tonnages.

11.2 CONVERTER'S OUTPUT

Verify the compiled information for the Converter's Output. The CPA definition for the **Converter's Output** is provided below:


The total weight of recycled plastic included in products sold, during the previous calendar year.

Information to be reported includes:

- The assessed period as defined above;
- Polymer type: include a different line for each polymer that the Data Generator is producing;
- Country of destination: Specify if the material was sold in the EU or it will be exported;
- Type of material: specify the tonnages which are pre-consumer or post-consumer. RecyClass definitions apply. If additional information is needed please check the CPA Guidance on waste definitions². This requirement is mandatory only for traceability Level 1.

EXAMPLE

Traceability Level 1.

Assessed period 	Polymer type	Sold in the EU or exported	Type of material (Pre-consumer/ Post-consumer)*	Tonnage
e.g., 01/2021 – 12/2021	e.g., PET	e.g., EU	e.g. Pre-consumer	e.g., 1,000
e.g., 01/2021 – 12/2021	e.g., PET	e.g., EU	e.g., Post-consumer	e.g., 5,000
e.g., 01/2021 – 12/2021	e.g., PET	e.g., exported	e.g., Post-consumer	e.g., 2,000
TOTAL	e.g., PET	e.g., EU	-	e.g., 6,000
TOTAL	e.g., PET	e.g., exported	-	e.g., 2,000
TOTAL	e.g., PET	-	e.g., Pre-consumer	e.g., 1,000
TOTAL	e.g., PET	-	e.g., Post-consumer	e.g., 7,000
GRAND TOTAL PET	e.g., PET	-	-	e.g.8,000

² CPA Guidance on Waste Definitions available at [DocsRoom - European Commission \(europa.eu\)](https://docsroom.europa.eu)

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e.g., 01/2021 – 12/2021	e.g., HDPE	e.g, EU	e.g, Post-consumer	e.g., 3,000
TOTAL	e.g., HDPE	e.g, EU	-	e.g., 3,000
TOTAL	e.g., HDPE	-	e.g., Post-consumer	e.g., 3,000
GRAND TOTAL HDPE	e.g., HDPE			e.g., 3,000
GRAND TOTAL ALL	-	-	-	e.g., 11,000

Explain in the report how the calculation was done to obtain the values and how you verified its plausibility. It is possible to extract the data from the production records for the Converter's Output and extrapolate that information to sales. In that case, verify the plausibility of the figures.

If any deliveries have been returned by the customer, do not include those in the reported tonnages.

12. ANNEX I: DEFINITIONS

Applicant

Organisation applying for Certification for a Process and Product(s), Components or Family(ies) of Products.

Organization

[ISO 22095:2020, 3.4.1]

Entity or group of people and facilities with an arrangement of responsibilities, authorities and relationships and identifiable objectives.

Site

[ISO 22095:2020]

Location with geographical boundaries at which defined activities under the control of an organization are carried out.

Certification

Third-party attestation under this Scheme.

Supplier

Company providing Recycled Input, Product(s), Family(ies) of Products or Components..

Supplier's Certificate

RecyClass Recycled Plastics Traceability Certificate or certificate of compliance under a recognised Certification by RecyClass.

Product Code

Unique transaction code for an incoming input *Batch* of material.

Traceability

[ISO 22095:2020, 3.6.1]

Ability to trace the history, application, location or source(s) of a material or product throughout the supply chain.

Batch

[EN/ISO 472:2013, 2.1679]

Quantity of material regarded as a single unit and having a unique reference. Batch is primarily a processing term.

Recycled Input

Batches of certified *Recycled Plastics* identifiable with a unique transaction code. *Certification must be granted by RecyClass or a Scheme recognised by RecyClass based on EN 14353:2007.*

Uncontrolled Recycled Input

Batches of recycled material originated in a non-certified Supplier and/or without traceability.

Output

Plastic Products that leave the *Process* for which *Certification* is being applied for.

Plastic

RecyClass

Material consisting of a polymer as defined in point 5 of Article 3 of Regulation (EC) No 1907/2006, to which additives or other substances may have been added, and which can function as a main structural component of final products, with the exception of natural polymers that have not been chemically modified.³

Product

Material, object or semi-finished product made entirely or partially of recycled plastics.

Family of products

Group of products made using the same processing technology, within the same line, of similar formulation, for similar applications and containing materials from the same waste origin.

Component

Specific elements of the output product when it contains different plastic parts, other materials or other.

Recycled Plastic

[EN/ISO 472:2013, 2.612]

Plastic prepared by processing in a production process from plastics waste materials for the original purpose or for other purposes, but excluding energy recovery. In a broad sense, the recycling of plastics covers any re-use of scrap material or discarded articles, including pyrolysis to recover useful organic chemicals. Recycled plastics may or may not be reformulated by the addition of fillers, plasticizers, stabilizers, pigments, etc.

Recycled Content

[CEN/TR 15353:2004, adapted]

Percentage by weight of recycled plastics in a product. Percentage by weight of *Certified Recycled Input* in *Output*. It must be defined between *Pre-consumer Material* and *Post-consumer Material*.

Post-consumer material

[ISO 14021:2016]

Descriptive term covering material, generated by the end-users of products, that has fulfilled its intended purpose or can no longer be used (including material returned from within the distribution chain). Note that the term “post-use” is sometimes used synonymously.

Pre-consumer material

[ISO 14021:2016]

Descriptive term covering material diverted from the waste stream during a manufacturing process. Note that this term excludes re-utilized material, such as rework, regrind or scrap that has been generated in a given process and is capable of being reclaimed within that same process. The term “post-industrial material” is sometimes used synonymously.

Off cuts, scrap, regrind material

[EN/ISO 472:2013, 2.1707]

Shredded and/or granulated recovered plastics material in the form of a free flowing material. The term is frequently used to describe plastics material in the form of scrap generated in a plastics processing operation and re-used in-house. The term is also used to describe fine plastics powder used as a filler in the recovery of plastics.

³ OJ L 155, 12.6.2019, p. 1-19

RecyClass

Waste

[EN/ISO 472:2013, 2.1710]

Any material or object which the holder discards, or intends to discard, or is required to discard.

Process

[ISO 22095:2020, 3.2.10]

Set of interrelated or interacting activities that use inputs to deliver an intended output.

Subcontracted Processing

Recycled Input delivered to *Site* which is produced by a third-party company also certified under *Certification* where the *Applicant* retains ownership of *Output* from the third-party *Organization*.

13. ANNEX II: TABLE OF CHANGES

Version	Date	Section	Update description
2.1	November 2021	5	Clarification on the wording.
2.1	November 2021	8, 2.1	Clarification on the wording.
2.1	November 2021	11	Addition of an Annex compliant with the requirements of the Circular Plastics Alliance.

Version	Date	Section	Update description
2.0	July 2021	1	Additional explanations in the introduction.
2.0	July 2021	2	New section on the object of conformity of the assessment.
2.0	July 2021	3	Editorial changes on the operating performance requirements.
2.0	July 2021	4	New section on a methodology for a sampling of products.
2.0	July 2021	5	Addition of a specific section describing non-conformities.
2.0	July 2021	6	Addition of a specific section providing additional guidance for auditors on the auditing procedure.
2.0	July 2021	7	New section on extension or changes affecting Certification.
2.0	July 2021	8	Clarification on the checklist requirements for auditors.
2.0	July 2021	9	New section on volume reconciliation calculation specifics.
2.0	July 2021	10	Clarification on the calculation of recycled content.
2.0	July 2021	11	Clarification on the definitions.

RecyClass

c/o Plastic Recyclers Europe
Avenue de Broqueville 12
1150 Brussels – Belgium

Phone : +32 2 786 39 08
info@recyclclass.eu

www.recyclclass.eu