

# RecyClass

## QUALITY MANAGEMENT & PROCEDURES

RECYCLABILITY CERTIFICATIONS

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# RecyClass

## 1 INTRODUCTION

This document lays out quality management systems of the RecyClass Recyclability Certifications and the procedure to apply for and obtain Certification.

RecyClass Certifications offer reliable third-party audit of the recyclability of a packaging design based on the RecyClass Design for Recycling Guidelines<sup>1</sup> and the “RecyClass Recyclability Methodology”<sup>2</sup>.

## 2 CERTIFICATION DEVELOPMENT AND MAINTENANCE

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

RecyClass regularly review all available documentation including the Certification Methodology, Certification Scheme, Audit Report templates, and Quality Management Systems and Procedures according to recent developments in the recycling industry and the results of recyclability laboratory testing. Changes and updates are implemented by the RecyClass Steering Board which is composed of recyclers and RecyClass representatives as laid out in the “RecyClass Internal Procedures”<sup>3</sup>.

A non-exhaustive list of cases where changes to Certification documentation might be needed can be found below:

- Changes to relevant European standards (e.g., EN 14340) or relevant legislation (e.g., requirements on the plastic packaging design) under the focus and scope of the Certification. Updates will need to be reflected into the Certification documentation.
- 1. Changes in the focus or/and scope of the RecyClass Design for Recycling and/or Recyclability Certification(s) by the RecyClass Steering Board.
- Repeated feedback from auditors following their experience during the audit process, check of conformity with audit requirements and completion of the Audit Report. Frequent valuable comments will be taken to the Steering Board for consideration to improve the Certification documentation.
- Stakeholders’ feedback and proposals from RecyClass members and supporters. If valuable and relevant to the Certification focus and scope, will be submitted to the Steering Board for consideration.

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

Suitable feedback is included in the respective documentation during the review. Reviewed documents are consulted with Certification Bodies and members to ensure the suitability and fitness of the added requirements or procedures. The RecyClass Steering Board approves the final version of the documents for publication.

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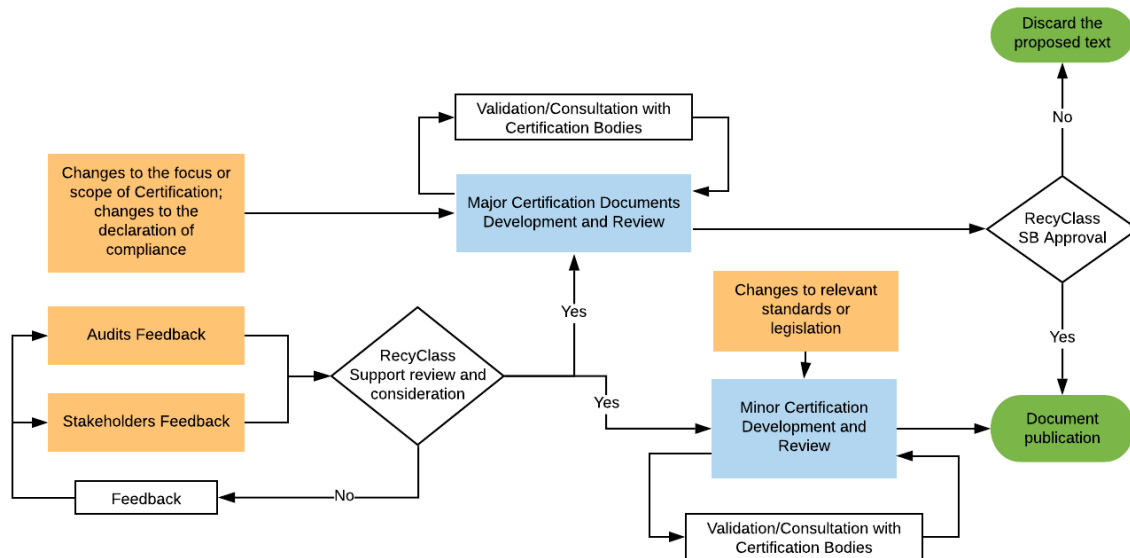
<sup>1</sup> *RecyClass Design for Recycling Guidelines available at <https://recyclclass.eu/recyclclass/design-for-recycling-guidelines/>*

<sup>2</sup> *RecyClass Recyclability Methodology available at <https://recyclclass.eu/recyclclass/methodology/>*

<sup>3</sup> *RecyClass Internal Procedures available at <https://recyclclass.eu/library-of-documents/>*

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

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



Documentation development and review is structured as follows:

- **Major Certification Documentation Development and Review**

General review of requirements, procedures and guidelines following changes to focus or scope of Certification or changes to the declaration of compliance, as well as feedback and/or proposals for development. This includes major suggestions to the Certification Scheme requirements and the certification procedure under or outside the focus and scope of the Certification.

These changes will have a major impact on the results of the Audit and will be recorded as a new version of the documents indicated as version X.

- **Minor Certification Documentation Development and Review**

Editorial changes, additional descriptions, or clarifications that will facilitate the understanding and usability of all available Certification documentation. Minor review of requirements, procedures and guidelines within the focus or scope of Certification. Changes in relevant regulation or legislation in the scope of Certification. These changes will have a minor impact on the results of the audit, and they will be recorded as a new sub version of the documentation indicated as version X.X.

## 2.1 SYSTEMATIC REVIEW

Certification Documentation Development and Review or an Editorial Review can be launched at any time by RecyClass. In addition, RecyClass will propose a systematic review of all available documentation every 3 years.

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

## 2.2 COMMUNICATION OF CHANGES

RecyClass will communicate via email the release of any new document versions (X) to Certification Bodies, Certification holders, License holders, Applicants, as well as RecyClass members and supporters following a Documentation Development and Review. Major changes made within the relevant documents will be described.

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

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

## 3 USE OF OFFICIAL DOCUMENTATION

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

Certification Bodies must use the Audit Tool to process any new audit requests to obtain a Certification code and generate the Audit Report and Certificate. Certification Bodies must create an account for Applicants to access the Audit Tool. More information is available in the Audit Tool Applicants Guidance and Audit Tool Auditor Guidance.

The latest available version of the Certification Scheme documentation must be used for any new Certification requests accepted by a Certification Body (except as described in section 10.4). Certification requests are considered *new* upon the signature of the Certification Agreement.

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

Each Audit Report includes specific information related to a packaging's design and its compatibility with recycling. The combination of different elements of a package result in the final recyclability assessment which will be reported in the Certificate. Additionally, the Audit Reports offer guidance to identify Packaging features that affected the final Recyclability.

RecyClass will determine specific conditions for recognized Certification Bodies detailing a transition period to adapt the changes within the scope of ISO/IEC 17065.

## 4 CERTIFICATION BODIES

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

Certification Bodies ensure that the Applicant complies with the terms described in the Certification Agreement and the Terms of Use as described in Annex I of this document.

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

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

## 5 ACCREDITATION BODIES

Accreditation Bodies conducts the accreditation procedure according to ISO 17011.

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

RecyClass cooperates with its home Accreditation Body and any other National Accreditation Bodies involved in the Certification accreditation and/or accreditation of recognized Certification Bodies.

RecyClass has a mechanism in place to collect information on the operation of the Certification from its home Accreditation Body and any other National Accreditation Bodies involved in the accreditation of the Certification and/or recognized Certification Bodies.

## 6 DATA CONFIDENTIALITY

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

National Accreditation Bodies will have access to necessary information required to evaluate a Certification Body for accreditation for this Certification scheme.

## 7 CERTIFICATES QUALITY CONTROL

# RecyClass

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

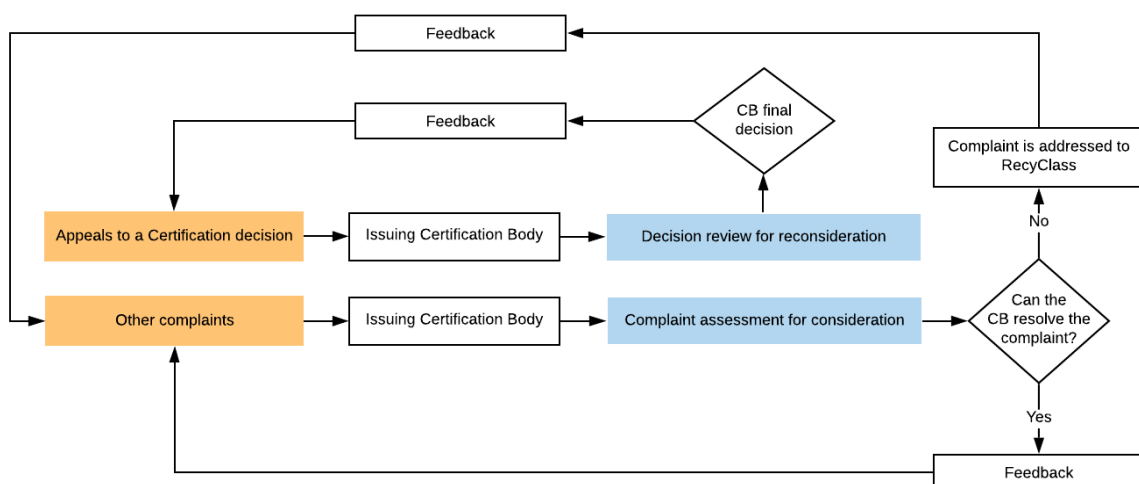
A RecyClass expert will select several audit reports annually for a sample check. The review of the audit reports is made anonymously using a third-party code to preserve the confidentiality of the Applicant. The procedure will be completed through the RecyClass quality control account, via the Audit Tool.

Any non-compliant behaviour or breach of the Cooperation Agreement with Certification Bodies may be reported to the Steering Board according to the procedures described in the document “Auditors and Certification Bodies Requirements”.

## 8 COMPLAINTS AND APPEALS

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

Figure 2. Complaints and appeals procedure



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

### 8.1 COMPLAINTS AND APPEALS TO RECYCLASS

When a complaint or appeal is not, or cannot be, resolved by the Certification Body, the issuer or the Certification Body can address them to RecyClass directly. Applicants can also direct complaints directly to RecyClass in case of lack of response from the Certification Body. The appeal procedure does not suspend the original decision of the Certification

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Body. Complaints and appeals must be submitted to RecyClass via official letter within one month of the formal notification of the Certification decision.

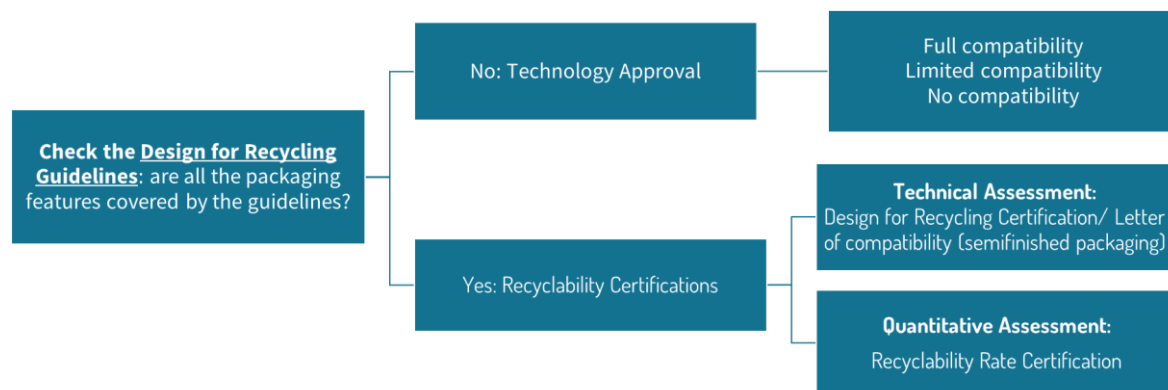
## 9 ELIGIBILITY TO APPLY FOR A CERTIFICATION

Any final plastic packaging, which falls under the scope of the RecyClass analysed packages and materials, may apply for Certification. Namely, packaging products must include all their different components and must be either pledged on the market or yet to be introduced with no further alternations to be made to its design.

## 10 CERTIFICATION PROCESS

Before applying for a Certification, the Applicant should check the Design for Recycling Guidelines to verify whether the assessment of a packaging recyclability within a RecyClass Certification is possible. Alternatively, the Applicant can apply for a Technology Approval. A decision tree in Figure 3 describes the recyclability assessment suitable for packaging.

Figure 3. Recyclability Certifications scenarios



### Technology Approval:

When one of the packaging feature is not included in the Design for Recycling Guidelines, laboratory testing following the RecyClass Protocols will be required by RecyClass. The Applicant may contact RecyClass and request a Technology Approval following the Procedures described in the document "RecyClass Internal Procedures". Any additional testing must be determined by RecyClass. If the technology gets approved by RecyClass after testing, the Applicant may apply for the Recyclability Certification. The Technology Approvals are all listed on the RecyClass website, otherwise they are not considered as valid.

### Recyclability Certifications:



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A packaging follows the Certification's route when all packaging features can be found in the Design for Recycling Guidelines; alternatively, when a Recyclability Approval has been performed, with a positive evaluation (full or limited compatibility).

The Applicant may contact a recognised Certification Body to start the Certification procedure. As a first step, Certification Bodies will provide the necessary information to Applicants for their understanding of the focus of the Audit Scheme, object of Certification and procedures. Certification Bodies will assess the eligibility of the Applicant. An Applicant can request a Design-for-Recycling Certification, Recyclability Certification or Letter of Compatibility by submitting a Certification Application Form, along with the RecyClass Online Tool Self-assessment Report to a recognised Certification Body.

Detailed information about the material composition of a given package must be provided to the auditor within the document "Product Specification Sheet", to ensure sound, scientific recyclability analysis as packaging often consists of multiple components with specific functionalities. The Product Specification Sheet is filled via the Audit Tool, by the Applicant. Depending on the complexity of each packaging, the auditor can request more detailed information on each component (e.g., bottle, decoration, cap, closing lid, seal, adhesive, ink, printing or other). Moreover, additional tests may be requested, such as a sorting test. The auditor can request information on basic packaging components such as description, weight or density, as well as details on the connection between components (mechanically, fully glued, laminated, etc.). Furthermore, for the completion of the audit, the Applicant must provide samples of the packaging assessed. The number of samples requested will depend on the complexity of the packaging and the possible tests that should be carried out. At least 10 units of the exact same packaging pledged on the market should be provided; in case of equivalent packaging added in the certificate, the number of samples is defined by the auditor based on the recommendation provided in the Auditors Guidance & Checklist.

Upon the completion of the audit, the Applicant will receive a Draft Audit Report issued by the Certification Body outlining the results. The Applicant may review this Draft Report and provide comments to the Certification Body if any. The final Certificate will be issued by the Certification Body, on behalf of RecyClass, duly signed by the reviewer of the audit or by a legal representative of the Certification Body. Communication on the Audit results and the Certificate must follow the guidelines included in the documents "Use of Claims Guidance" and "Certification Mark Design Guidance".

## 10.1 AUDITING PROCEDURE & CORRESPONDENCE

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

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

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

The Certification Body will provide a list of all information that the Applicant must make available to the auditor prior the agreed audit date that will allow a successful packaging audit. For each packaging included within the audit, documents to be prepared prior to the audit include but are not limited to:

# RecyClass

- Technical Data Sheets of each packaging components.
- Description of the packaging construction.

Certification Body will conduct the documentation review to evaluate the information and documentation provided and determine to which extend the packaging fulfils the audit requirements. The Certification Body may ask for additional documentation or information to better understand the process and organization.

During the audit, the Certification Body should refer to the latest version of the documents “Auditor Guidance & Audit Checklist” and “Auditors Guidelines & Scoring Tables” provided by RecyClass (except as described in section 10.4).

After the audit, the Certification Body will send the Audit Report and Certificate.

## 10.2 AUDIT OUTCOME

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

- Draft Report (electronic copy): Issued no later than 4 weeks after the audit date. The Applicant will have two weeks to make comments.
- Audit draft Report: Sent by the Certification Body as an anonymous report to the quality controller for quality review (if applicable).
- Audit Report (secured electronic copy and printed copy x2): The Certification Body will issue the final Audit Report.
- Certificate: The Certification Body will provide the final certificate, signed by the reviewer of the audit or by a legal representative of the Certification Body. An Annex will include a list of any equivalent packages. The Certificate will be shared with RecyClass who will update this information to the RecyClass website upon the Applicant’s approval.

Moreover, the Applicant will receive the "Use of Claims Guidance" document.

The details of the information exchange between the Applicant and the Certification body are described in section 10.1. The document generation is managed through the Audit Tool – more information on this is available in the documents “Audit Tool Applicants Guidance” and “Audit Tool Auditor Guidance”.

## 10.3 DETAILED PROCESS OVERVIEW

**Table 1: Detailed process overview**

| <b>Process</b>  | <b>Documentation and information exchanged</b>                         | <b>Participants</b>           |
|---|--|-------------------------------|
| <u>Introduction to the Certification</u><br>Certification Body provides the Applicant with necessary information to understand the procedures, purpose of the audit and Certification Scheme requirements. Certification Body organises a meeting with the Applicant to ensure the right understanding and create mutual trust between parties. | Quality Management and Procedures, RecyClass Recyclability Methodology | Applicant, Certification Body |
| <u>Application submission</u><br>The Applicant submits a certification request by sending a signed Application Form along with a RecyClass Self-Assessment Report   | Application Form, RecyClass Self-Assessment report                     | Applicant, Certification Body |

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| to a recognised Certification Body of their choice. The Certification Body might request additional information for clarification.  |  |   |
| <p><b><u>Application approval and contracting of the assessment</u></b></p> <p>The Certification Body proposes a planning, timescales, and a quote to the Applicant for the audit.</p> <p>The Certification Body determines to which extend the Applicant fulfils the Certification requirements.</p> <p>If a Recyclability Approval is needed, the Certification Body will address the Applicant to RecyClass. RecyClass will guide the Applicant through the testing procedure described in the document “Recyclability Approvals – Quality Management and Procedures”.</p>   | Audit Plan, Budget proposal  | Applicant, Certification Body, (RecyClass optionally) |
| <p><b><u>Signature of the Certification Agreement and NDA</u></b></p> <p>Certification Body signs a Certification Agreement with the Applicant.</p> <p>The Applicant and the Certification Body will also sign an NDA to safeguard the confidentiality of their process.</p>  | Certification Agreement, NDA   | Applicant, Certification Body                         |
| <p><b><u>Communication with RecyClass &amp; data management</u></b></p> <p>Certification Bodies must inform RecyClass of any new applications specifying the type of Certification requested. RecyClass will subsequently assign a code (000-XXX-ZZ) to each Certification which must be included on the Audit Report and its associated Certificate. The Certification code will be created according to the following guidance:</p> <p>000 – unique code per Certification</p> <p>XXX – 3 letters identifying the company name</p> <p>ZZ – 2 letters identifying the Certification Body</p> <p>If needed, RecyClass will provide a third-party code for the verification of the Audit Report.</p> | Certification code, third-party code   | Certification Body, RecyClass                         |
| <p><b><u>Data transfer, Sorting Test &amp; Quick Tests</u></b></p> <p>The Applicant submits the Product Specification Sheet including additional data pertaining to the properties of the packaging in questions.</p> <p>If applicable, the applicant submits the results of the sorting test performed in a recognized sorting facility according to Sorting Evaluation Protocol for Plastic Packaging.<sup>4</sup></p>  | Product Specification Sheet<br>Sorting Test results (if applicable)<br>Additional information if any | Applicant, Certification Body (auditor)               |

<sup>4</sup> *Sorting Evaluation Protocol is available at [Sorting Evaluation Protocol for Plastic Packaging \(recyclass.eu\)](https://www.recyclass.eu)*

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| <p>If applicable, Certification Bodies can perform Quick Test procedure<sup>5</sup> for a specific packaging feature.</p> <p>The Applicant will provide samples as defined by the Certification Body in the contract.</p>  |  |  |
| <p><u>Equivalent Packaging (optional)</u></p> <p>Applicants may also request to include an Annex to the Certificate and to the Audit Report listing equivalent packaging. Equivalent packaging may be the same in terms of material and may only vary in size, artwork, supplier or shape to the original packaging (suitability must be evaluated by the auditor). Product Specification Sheets must be provided to the Certification Body.</p>   | Product Specification Sheet  | Applicant, Certification Body (auditor)          |
| <p><u>Evaluation Assessment &amp; Audit Report Preparation</u></p> <p>Upon the completion of the analysis, the auditor will issue an Audit Report stating the results via the Audit Tool on behalf of the Certification Body to the Applicant. The draft is shared with the Applicant via the Audit Tool, to address and clarify any final questions.</p>  | Audit Report   | Applicant, Certification Body (auditor)          |
| <p><u>Review and Certification decision</u></p> <p>A recognised auditor from the Certification Body who was not part of the audit, will review the Audit Report (and additional documentation if needed) to ensure it provides an adequate and effective demonstration of the fulfilment of the requirements specified in the Certification Scheme.</p> <p>If the outcome of the review is positive, the recognised auditor makes the decision to issue the Certification. When the review is negative, Certification will not be granted.</p> | Audit Report; Certificate  | Certification Body (reviewer)                    |
| <p><u>Quality Control (optionally)</u></p> <p>If applicable, review of the anonymised Certification Report by the RecyClass responsible body. The redacted, anonymised report is managed through the RecyClass Quality Check via the Audit Tool, without access to company information.</p>  | Anonymised Audit Report  | Certification Body, RecyClass quality controller |
| <p><u>Certificate release</u></p> <p>Following a positive outcome, the Certification Body issues the final Certificate, via the Audit Tool. In case of a negative outcome, a certificate of non-compliance, confirming that the product is not recyclable according to RecyClass' methodology will be issued.</p> <p>The Certificate must state the list of certified packaging.</p>   | <p>Audit Report</p> <p>Certificate</p> <p>Use of Claims Guidance</p> <p>Certification Mark Design Guidance</p> | Certification Body, RecyClass                    |

<sup>5</sup>Quick test procedures for each stream are available at [Testing Methods - RecyClass](#)

|   |  |                                      |
|---|--|--------------------------------------|
| <p>The Certificate must state the issuing Certification Body and must be signed by the reviewer of the audit, or by a legal representative of the Certification Body.</p> <p>The Certification Body will also provide the Use of Claims Guidance and the Certification Mark Design Guidance to the Applicant detailing how the results of the audit may be communicated.</p> <p>The final certificate must be issued within a maximum of 8 weeks after the correct submission of the Product Specification Sheet by the applicant, subject to a prior issuance of the Final Report. The Certification Body will share the final Certificate with RecyClass and communicate the finalisation of the auditing process. In case of positive recyclability evaluation (i.e., packaging ranked A, B or C), the packaging will also be listed on the RecyClass website, after the consent of the Applicant.</p> <p>The certification holder can use the Certification Mark on the certified products in line with the Use of Claims Guidance and Certification Mark Design Guidance documents"</p> <p>Further communication campaigns can be developed in coordination with the Applicant. All the campaigns will have to be approved by the Applicant.</p> |  |                                      |
| <p><u>Certificate extension</u></p> <p>After the issuance of the certificate, following a positive evaluation of the packaging with the version X of RecyClass Design for Recycling Guidelines in place, or version X-1 in case a Grace Period has been applied (refer to section 10.4), it is possible to add a certain number of equivalent packaging, until the release of a new version of those Guidelines (X+1). The time validity of the certificate will be unchanged.</p> <p>The new audit report and certificate generated will receive an updated code according to the following guidance 000-XXX-ZZ_eXX</p> <p>eXX – 2 numbers identifying the number of versions</p>  | <p><i>See previous documentation</i></p> | <p>Certification Body, Applicant</p> |
| <p><u>Multi-certificates</u></p> <p>In the case of multi-part packaging fully separable (by the consumer to access the product or as a result of the collection, compaction and sorting process), different audits should be carried out for each separable item.</p> <p>The different audit reports and certificates consequently generated will receive similar codes according to the following guidance :</p> <p>Component 1: 000-XXX-ZZ_c01</p>  | <p><i>See previous documentation</i></p> | <p>Certification Body, Applicant</p> |

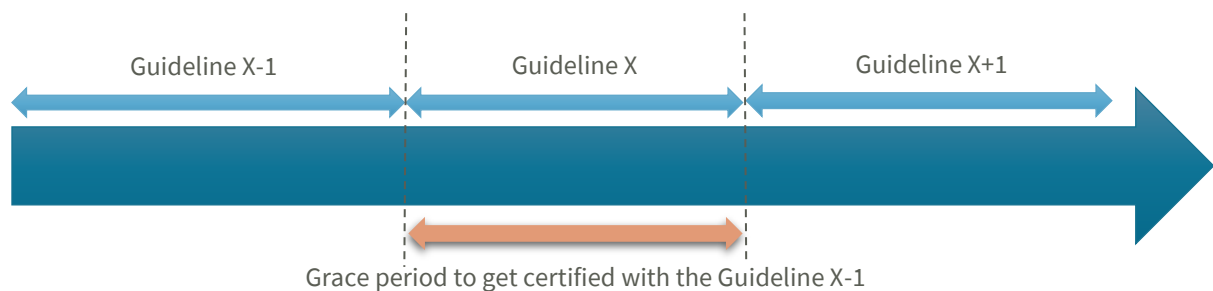
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|   |                                   |  |
|---|-----------------------------------|--|
| Component 2: 000-XX-ZZ_c02<br>Component nn: 000-XX-ZZ_cnn<br>cnn – 2 numbers identifying the component number   |                                   |  |
| <b><u>Monitoring Audit</u></b><br>A surveillance audit will take place every 3 years. The date of validity will be carried down three additional years.<br><br>Alternatively, the audit may take place up to 8 weeks within the extension period of the previous certificate. In this case, the period of validity is adjusted. It will not exceed the day and month of expiration of the initial certificate, plus X additional years.<br><br>In a monitoring audit the Certification code will be changed according to the following guidance: 000-XXX-ZZ-rXX<br>rXX – 2 numbers identifying the number of revisions. | <i>See previous documentation</i> | Certification Body, Applicant, RecyClass |

## 10.4 GRACE PERIOD

As the development of new plastic products takes longer than the lifespan of a Guideline, a grace period can be granted if a company would like to receive a certification for a plastic product negatively impacted by a recent update of Guidelines. Figure 4 illustrates the process of the grace period.

Figure 4: Grace Period illustration



The grace period allows the Certification Bodies to certify plastic products with the previous version – and only the previous version – of the Auditor Guidelines & Scoring Tables document (i.e., to certify products according to guideline X-1). However, the three-year validity of the certificate starts from the release of Guideline X, independently of the audit date.

RecyClass Team and the Certification Bodies must keep active versions X and X-1 of the Auditors Guidelines & Scoring tables document. Once the Guideline X+1 and its corresponding Auditors Guidelines & Scoring tables document enter into force, version X-1 can be archived, and the product can no longer be certified following it. In the case of a certificate extension, the additional equivalent packaging assessed with the version X-1 or X of the Guidelines must be included before the issuance of the version X+1, following the same rule as the ‘mother’ certificate. Indeed, after the publication of version X+1, the certificate cannot be extended anymore.

After the expiration of the grace period, version X-1 of the Auditors Guidelines & Scoring Tables document is archived. Only the current version X of the auditor’s document is active, and all plastic products must be certified according to its requirements.

Example :

If the certification is being carried out in March 2025, the guidelines X from January 2025 are available. When the new guidelines of July 2025 will be published (X+1), it won’t be possible anymore to use the guidelines of July 2024 (X-1) for assessing a packaging but only the ones of January or July 2025 . If a company obtains a certificate with the guidelines of July 2024 after January 2025, it will be possible to add equivalent packaging to the certificate until the publication of the guidelines of July 2025 (X+1).

## 11 VALIDITY OF CERTIFICATION

The period of validity of the Certification and the right to use RecyClass Certification Mark and claims is limited to 3 years -1 day from the date of issue of the initial certificate, given that no alterations to the packaging design or composition are made. The period of validity starts with the date of issue of the Certificate.

The period of validity is extended for 3 additional years in case of a Monitoring Certification. The period of validity may be shorter than 3 years depending on the date of issue of the certificate. When a monitoring certificate is issued within the 8-week extension period following the date of expiration of the previous certificate, the period of validity is adjusted. It will not exceed the day and month of expiration of the initial certificate, plus X additional years.

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

- Certification is valid only for the specific packaging that has been audited and listed in the Certificate. Any variations will have to be individually verified and included in the list of equivalent packages found in the Audit Report and Certificate.
- Certification holders must fulfil all Certification requirements as described during the audit preparation. Any significant changes to the products under Certification must be communicated to the Certification Body immediately.

Upon the expiry of a certificate or in case of alterations to the original packaging, a monitoring audit should be conducted. The validity will subsequently be renewed for additional three years. Monitoring audits will also apply to any variations of the packaging that has previously been certified, for any packaging positively impacted by a recent update of the Design for Recycling Guidelines, or for any packaging positively evaluated through a Recyclability Approval.

## 12 MONITORING AUDITS

A monitoring audit must take place every 3 years to maintain the Certification. The evaluation must follow the Design for Recycling Guidelines in place at the time of the monitoring audit. Monitoring audits ensure continuous fulfilment with the audit requirements. Monitoring audits can be conducted up to 8 weeks in advance of the date of expiration. Upon a positive outcome of the Certification, the validity will subsequently be renewed for 3 additional years.

Decision-based extensions of the validity of a certificate can be granted in justified cases by Certification Bodies in consultation with RecyClass. Certification Bodies will count with an internal procedure describing the mechanism of the time extension. Time extensions can be granted for a maximum period of 8 weeks. An extension of the validity of a Certificate will not modify the date of validity for the next period.

## 2. SUSPENSION OR WITHDRAWAL OF CERTIFICATION

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

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

Certification Bodies will notify the Certification holders of the suspension of Certification. 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 Certification mark already on the market.
- Conditions to be fulfilled by the Certification holder for lifting the suspension.

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

In case of withdrawal of the Certification, Certification Bodies must request Certification holder to remove claims and Certification Marks from all affected products within the custody of the certification holder, clients or directly on the market. Certification holders are also requested to inform related customers by letter.

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

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

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

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

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

## 13 CHANGES AFFECTING CERTIFICATION

Changes in the product that would affect conformity with the Certification Scheme requirements must be communicated to the Certification Body.

Any extension of the scope of the conformity assessment, addition, or removal of products must be communicated by the Applicant to the Certification Body to amend the Certificate.

Expansion of the Certification can be done after the issue of the Certification via documentation review.

## 14 COST OF CERTIFICATION

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

- RecyClass Certification management fee. RecyClass applies a fee to all Certifications to sustain the development and maintenance cost of the Audit Schemes. This includes support to Certification Bodies, protection of Certification marks, maintenance of the Audit Tool, and organisation of Auditors Workshops among others.
- Audit fee which is set independently by Certification Bodies; therefore, the costs may vary. The budget proposal must be provided to the Applicant in advance.

The RecyClass basic management fee is set at 150€ for all the issued Recyclability Certificates with none or up to 10 equivalent packaging. For more than 10 equivalent packaging, the Certification fee applied is described in Table 2.

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RecyClass members have 1, 3 or 5 basic management fees per year included with the annual membership fee (respectively, if Bronze, Gold or Platinum members), across all RecyClass Audit Schemes<sup>6</sup>. It implies that RecyClass members are offered 150 €, 450 € or 750 € in value (respectively, if Bronze, Gold or Platinum members) per year.

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<sup>6</sup> *This includes Recyclability Certifications, as well as Recycling Process and Recycled Plastics Traceability Certifications.*

**Table 2: Structure of the RecyClass Recyclability Certification management fee**

| Cluster number of equivalent packaging | Number of packaging included in the extension | Cost, € | Total cost, €          |
|--|---|---------|------------------------|
| 1                                      | 0 (basic management fee)                      | 150     | 150                    |
| 2                                      | 1-10  | 150     | 150                    |
| 3                                      | 11-30   | 150     | 300                    |
| 4                                      | 31-50   | 150     | 450                    |
| 5                                      | 51-70   | 150     | 600                    |
| 6                                      | 71-90   | 150     | 750                    |
| 7                                      | 91-100  | 150     | 900                    |
| 8                                      | 101-150                                       | 1000    | 1900                   |
| 9                                      | 151-200                                       | 1000    | 2900                   |
| 10                                     | 201-250                                       | 1000    | 3900                   |
| n-1                                    | 251-300                                       | 1000    | 4900                   |
| n                                      | $X_n = X_{n-1} + 50$                          | 1000    | $Y_n = Y_{n-1} + 1000$ |

The table explains the variation of the certificate management fee, dependent on the number of the equivalent packaging.

The variables are the following:

**n:** cluster number of equivalent packaging.

**X:** number of equivalent packaging.

**Y:** total cost.

If the Certification regroups more than 300 equivalent packaging, the increment of the certification fee will be 1000€ for each addition of 50 equivalent packaging.

## 15 COMMUNICATIONS, USE OF CERTIFICATE AND CERTIFICATION MARKS

Audit results can be used on any communication material referring specifically and exclusively to the certified packaging – for instance on websites, social media platforms or the packaging itself. The information and conditions explained in the “Use of Claims Guidance” apply. The elements of the Certification mark cannot be altered in any way and must be used together as a whole. Where adequate, the Certification mark in black or in negative can be used. The guidelines and requirements included in the document “Certification Mark Design Guidelines” apply. Certification Bodies are responsible for the monitoring, data collection and reporting on the use of Certificates, claims and Certification marks related to delivered Certificates.

RecyClass may use aggregated data referred to the results of the RecyClass Certificates for communication purposes. Certificates with positive outcome (i.e., class ranking A, B or C) will be added to the directory of Certified packages available online unless the certified company wishes to not disclose publicly their results.

To protect the integrity of the Certification and the validity of the certified packaging claims, it is important that the Certification marks are used correctly and only in relation to the packaging that has been certified. If you think the mark is being misused, please report it immediately to [info@recyclass.eu](mailto:info@recyclass.eu).

## 16 MISUSE OF THE CERTIFICATION CLAIMS AND MARKS

Unauthorized use of the RecyClass Recyclability Certification Mark is not permitted for any products not covered under a license agreement/for any products not covered under a Certification.

Examples of misuse include but are not limited to:

- A company uses the RecyClass Recyclability Certification Mark without being in possession of a valid certificate.
- A certification holder uses the Certification Mark with an expired or withdrawn Certificate.
- A certification holder uses the Certification Mark on a product or process where changes were made without informing the issuing Certification Body. Change of the process or products requires re-certification or an amendment to the certificate.
- A certification holder uses the Certification Mark for products which were not included under the Certification scope.

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

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The right to use Certification marks and claims are issued to the certification holder by the recognised Certification Bodies together with the Certificate. In case of verified misuse, Certification Bodies must take appropriate measures with certification holders and demand them to implement corrective actions within a determined period of time. In case of failure to comply, Certification can be suspended and withdrawn.

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

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

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

## 17 ANNEX I: TERMS OF USE OF CERTIFICATION & VALIDITY CONDITIONS

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

- Certification holders must fulfil all Certification requirements as described during the audit preparation. Any significant changes to the process or products under Certification must be communicated to the Certification Body immediately.
- Use of claims and Certification marks are restricted to certified products and processes following the guidelines provided in the document "Use of Claim".
- Certification holders must maintain records and address any complaints submitted related to a valid Certification.
- Certification holders must not use any RecyClass Certificate in a manner which could bring RecyClass and its Certification Bodies into a dispute.
- In case of withdrawal of a Certificate by the Certification Body, certification holder must stop the use of the associated claim and Certification marks.

Certification holders must inform the relevant Certification Body of any changes that may affect the ability of a package to conform with the Certification requirements. Certification holders might request an extension of the Certification.

## 18 ANNEX II: CONTROL TABLE OF CHANGES

| <i>Version</i> | <i>Date</i> | <i>Section</i>                 | <i>Update description</i>   |
|----------------|-------------|--------------------------------|---|
| 3.0            | March 2025  | 10.2,<br>10.3, 10.4,<br>11, 12 | Clarification on the Grace Period, Certificates Extension, Multi-certificates.  |
| 2.2            | June 2024   | 1                              | Wording clarification.  |
| 2.2            | June 2024   | 3                              | Added Audit Tool in the use of documentation  |
| 2.2            | June 2024   | 5                              | Clarification about Accreditation Bodies cooperation with RecyClass   |
| 2.2            | June 2024   | 7                              | Mention of the Audit Tool in the quality control procedure  |
| 2.2            | June 2024   | 10                             | Wording clarification and mention of the Audit Tool. Clarification on the relationship between the Recyclability Approval and the Certification Scheme. Clarification on the signature of the certificate. Specification on the sampling procedure, in case of equivalent packaging added to the certificate. |
| 2.2            | June 2024   | 10.2                           | Clarification on the signature of the certificate.  |
| 2.2            | June 2024   | 10.3                           | Clarification about the data transfer documentation, sorting test and quick test procedure, clarification about time to complete audit and monitoring audit procedure. Specification on the equivalent packaging; addition of Certificate extension.  |
| 2.2            | June 2024   | 10.4                           | Wording clarification.  |
| 2.2            | June 2024   | 11                             | Specification on the possibility of performing monitoring audits; wording clarification. Clarification about validity.  |
| 2.2            | June 2024   | 12                             | Update of the timeline for the monitoring audit. Time extension of the certificate of 2 months.   |
| 2.2            | June 2024   | 15                             | Structure of the RecyClass Recyclability Certification management fee   |
| 2.2            | June 2024   | 16                             | Certification Body's role in claims monitoring and data collection. Rewording with "Certification Mark" instead of "logo".  |
| 2.2            | June 2024   | 17, 18                         | Rewording with "Certification Mark" instead of "logo".  |

| <i>Version</i> | <i>Date</i>   | <i>Section</i> | <i>Update description</i>  |
|----------------|---------------|----------------|--|
| 2.1            | November 2021 | 2.2            | Added point on the communication of changes to Accreditation Body. |

|     |               |      |   |
|-----|---------------|------|---|
| 2.1 | November 2021 | 3    | Wording clarification.  |
| 2.1 | November 2021 | 5    | Addition of a description of requirements for Accreditation Bodies (new section).   |
| 2.1 | November 2021 | 10.1 | Wording clarification.  |
| 2.1 | November 2021 | 10.2 | Addition of a grace period to get certified (new section).                          |
| 2.1 | November 2021 | 11   | Exception to the valid period of the certificate in case a grace period is granted. |
| 2.1 | November 2021 | 12   | Description of provisions for the extension of certificates.                        |

| <b>Version</b> | <b>Date</b> | <b>Section</b> | <b>Update description</b>  |
|----------------|-------------|----------------|--|
| 2.0            | August 2021 | 2              | Additional explanation added on the procedure for changes and updates within the Certification Scheme.                           |
| 2.0            | August 2021 | 3              | Added requirements on the use of official documentation.   |
| 2.0            | August 2021 | 4              | Added explanations on the communication between RecyClass and Certification Bodies.  |
| 2.0            | August 2021 | 6              | Editorial changes.   |
| 2.0            | August 2021 | 7              | Detailed explanation for Certification Bodies on how to handle complaints from Certification holders, as well as RecyClass role. |
| 2.0            | August 2021 | 8              | Clarification, editorial change.   |
| 2.0            | August 2021 | 9              | Addition of procedure steps and clarifications for the Certification procedure.  |
| 2.0            | August 2021 | 10             | New section specifically on validity of Certification.   |
| 2.0            | August 2021 | 11             | New section specifically on monitoring audits.   |
| 2.0            | August 2021 | 12             | New section specifically on suspension or withdrawal of Certifications. Clarifications were added.                               |
| 2.0            | August 2021 | 13             | New section specifically on changes affecting Certification.   |
| 2.0            | August 2021 | 16             | New section specifically on misuse of the Certification claims and marks.  |

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