

RecyClass

RECYCLASS INTERNAL PROCEDURES

GOVERNANCE &
TASKS DISTRIBUTION
FOR RECYCLASS STAKEHOLDERS

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RecyClass

1. INTRODUCTION

RecyClass is a comprehensive and technical cross-industry initiative founded by Plastics Recyclers Europe (PRE) that works to advance plastic products' recyclability and to establish a harmonised approach towards recycled content calculation and traceability. Activities within RecyClass include the development of Recyclability Evaluation Protocols and scientific testing of innovative materials, which serve as the base for updating the Design for Recycling Guidelines and the RecyClass Online Tool. Furthermore, RecyClass develops and maintains certification schemes for plastic products' recyclability, plastic recycling processes, plastic sorting processes and recycled plastic traceability in plastic products. RecyClass was constituted to provide a neutral and transparent ground for discussion among the representation of the whole plastics value chain. RecyClass activities focus on giving companies a detailed and personalised assessment to improve the recyclability of their plastic products and to integrate recycled plastic into their products.

RecyClass structure and functions are described below. In case of contradiction/ambiguity between the Articles of Association of PRE and the RecyClass Internal Procedures, the Articles of Association will take precedence over the RecyClass Internal Procedures¹.

2. ROLES & TASKS DISTRIBUTION

RecyClass is structured in branches, one related to packaging and another to Automotive & EEE (Electrical and Electronic Equipment). Each branch is composed of the Steering Board (SB), the Advisory Board (AB), Technical Committees (TC), Task forces (TF), as well as a group of Supporters, Certification Bodies and Recognised Testing Facilities. The RecyClass Team offers secretariat functions across all groups.

An overview of the RecyClass structure is provided in Figure 1, while the interaction of the different groups developed in the packaging branch can be found in Figure 2.

¹ [Plastics Recyclers Europe, Articles of Association](#)

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Figure 1: Overview of RecyClass structure

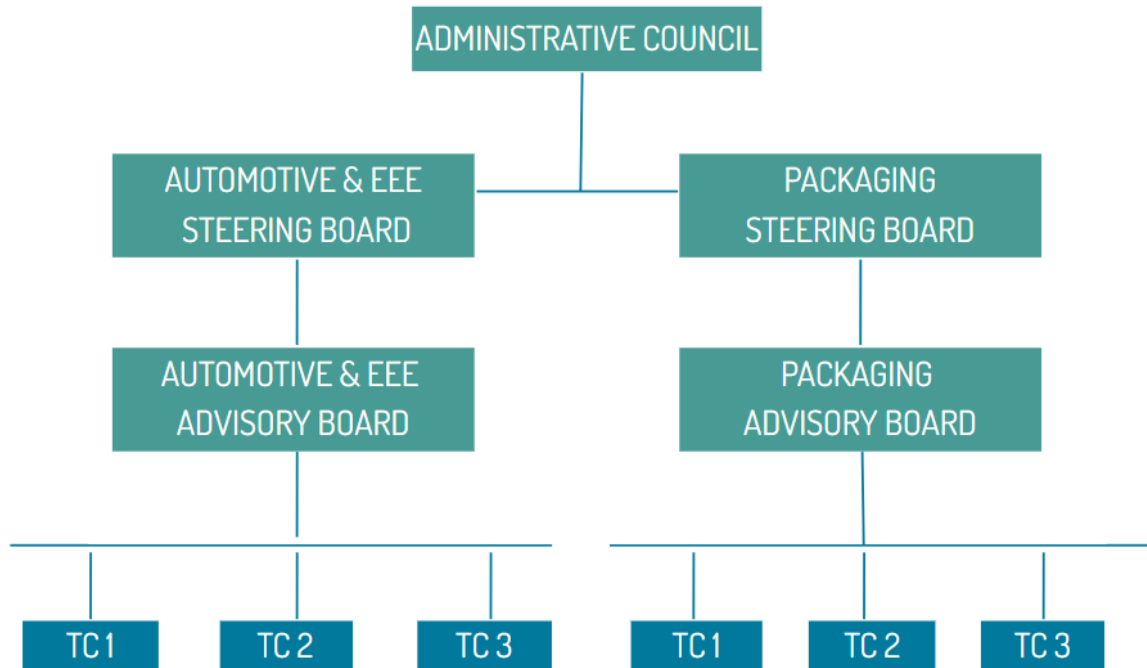
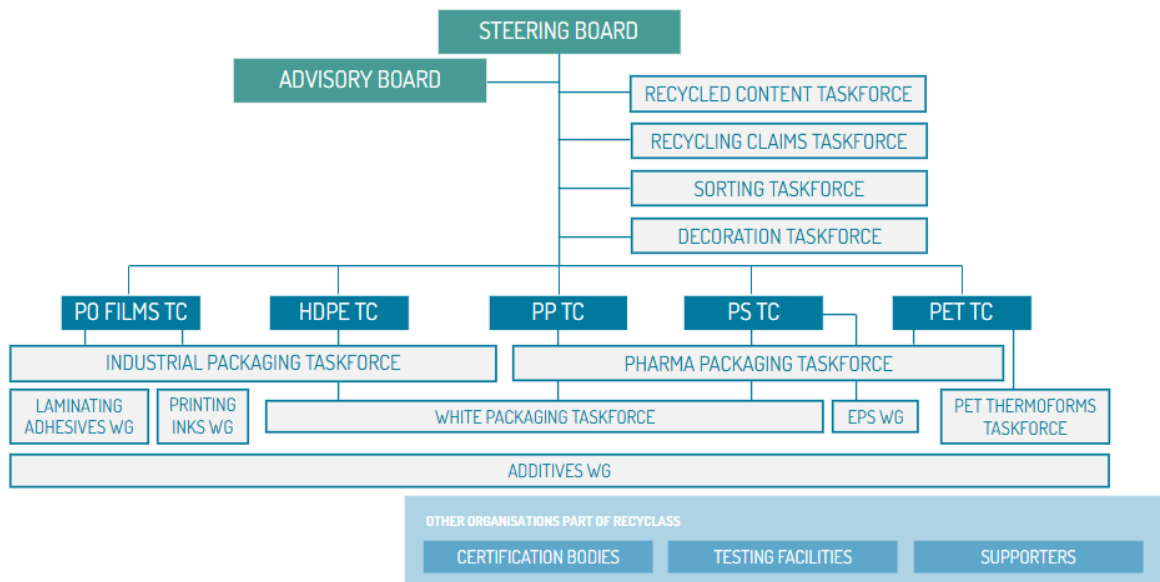


Figure 2: RecyClass Structure and organisation of working groups in the packaging branch



2.1 STEERING BOARD (SB)

For each branch of RecyClass, the SB is composed of a minimum number of elected Platinum members of the respective branch, including the Chairman of the corresponding Advisory Board, the chair of RecyClass and the chairs

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of each Technical Committee within that branch. For the RecyClass packaging branch, the AB appoints 5 representatives, including the chairs of the Sorting and Claims Task Forces, to the SB approved by the SB chair. Extension or modification of the SB composition is under the responsibility of the SB and must be approved by at least 75% of the members of the SB of a given branch of RecyClass.

All SB participants represent RecyClass and report only to them within the boundaries of the Internal Confidentiality Agreement. The Chair of the SB of both branches of RecyClass must be a recycler appointed by the Board of PRE and elected during the PRE General Assembly. Each member of the SB is elected for 2 years. If a vacancy occurs before the end of the mandate, elections will be held to nominate a successor for the remainder of the mandate period.

The SB meets at least once every quarter. The decisions of the SB shall be approved by a majority vote of the members. If a SB member cannot attend a decision-making meeting for any reason outside that meeting, the decision can take place via other means, such as phone or email. All requests for a decision should be returned within 2 weeks of receipt or the decision will be deemed to be accepted. The Chair will have the casting vote.

The meeting minutes will be circulated via email to the participants within 30 days of the meeting. Participants will have 2 weeks to submit comments/amendments to the RecyClass Team. After that period, the minutes will be deemed approved. RecyClass SB is established to:

- Define the priorities of the RecyClass branch (strategic level).
- Promote RecyClass at events when agreed, e.g., by giving speeches at conferences.
- Approve Applicants for RecyClass Membership.
- Approve Supporters, Certification Bodies, Testing Facilities.
- Create Technical Committees.
- Create Task forces on specific topics.
- Validate recommendations on recyclability evaluations of the TCs.
- Approve documents for external communication.
- Settle and keep up to date the standard third-party agreement document and the Non-Disclosure Agreement (NDA) using the support of a lawyer if required.
- Prepare an Annual Activities Report on RecyClass together with the RecyClass Team to report to the AB.

The Chair of the RecyClass branch SB is appointed to perform the following tasks:

- Steer the work that needs to be done by the SB.
- Promote RecyClass at events when agreed, e.g., by giving speeches at conferences.
- Chair SB meetings and coordinate with the RecyClass Team to draft the agenda.
- Approve drafted SB meeting minutes.

2.2 ADVISORY BOARD (AB)

The AB of each branch of RecyClass is constituted by Platinum members of the related RecyClass branch. The AB meets formally (physically or online) at least once every quarter. The AB will appoint a Chair which is elected for a period of 2 years. The Chair of the AB steers the work in the AB and serves as a communication point between the AB and the SB. For each branch of RecyClass, the Chair of the AB has a seat in the corresponding RecyClass SB. Additionally, up to 2 representatives of the AB are appointed to the corresponding SB. The Chair and 2 representatives of the AB appointed to the corresponding SB should represent different sector of the value chain (i.e. brands/retailers, converters and raw material producers for packaging and OEMs, tiers and raw material producers for the automotive). The Chair and the 2 AB representatives appointed to the SB will co-chair the AB for the 2 years with a rotation period of 8 months each with the following order: for packaging: brands, converters and raw materials producers; for Automotive & EEE: OEMs, tiers and raw materials producers.

The AB of each branch also counts with 2 voting seats on the corresponding Technical Committees. If a vacancy occurs before the end of the mandate, the resigning AB representative can propose as a replacement a colleague from the same company. The change will be considered effective if there is no opposition by the AB, otherwise elections will be

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held to nominate a successor for the remainder of the mandate period. Each Platinum member of a RecyClass branch has one vote for the election of the corresponding AB Chair, AB representatives and representative seats in the TCs. Platinum members of one branch of RecyClass have no voting rights in the election of AB Chair and AB representatives of a different branch of RecyClass.

If a participant cannot attend a decision-making meeting for any reason outside that meeting, a decision can take place via other means, such as phone or email. All requests for a decision should be returned within 2 weeks of receipt or the decision will be deemed to be accepted. The chair of the AB will have the casting vote. An AB participant shall attend all meetings or present a justified excuse.

The meeting minutes will be circulated via email to the participants within 30 days of the meeting. Participants will have 2 weeks to submit comments/amendments to the RecyClass Team. After that period, the minutes will be deemed approved.

The RecyClass AB is established to:

- Raise topics for discussion with the corresponding SB.
- Discuss and monitor the evolution of recyclability and propose and develop trends in plastic.
- Propose to the SB the establishment of specific task forces on topics of interest.
- Review and discuss the RecyClass Annual Report.

The AB chair is elected to:

- Chair AB meetings and steer the work that needs to be done by the AB.
- Draft the agenda of the meetings together with the RecyClass Team.
- Approve drafted AB meeting minutes.

2.3 ADMINISTRATIVE COUNCIL

The Administrative Council (AC) is composed of the SB Chair of RecyClass, 1 recycler and 1 AB member from the Packaging SB and 1 recycler and 1 AB member from the Automotive & EEE SB. Elections will run every 2 years. If a vacancy occurs before the end of the mandate, elections will be held to nominate a successor for the remainder of the mandate period.

The AC meets once every quarter. The decisions of the AC shall be approved by a majority vote of the members. If an AB member cannot attend a decision-making meeting for any reason outside that meeting, a decision can take place via other means, such as phone or email. All requests for a decision should be returned within 2 weeks of receipt or the decision will be deemed to be accepted. The RecyClass Chairman will have the casting vote.

The meeting minutes will be circulated via email to the participants within 30 days of the meeting. Participants will have 2 weeks to submit comments/amendments to the RecyClass Team. After that period, the minutes will be deemed approved. The RecyClass AC is established to:

1. Revise the RecyClass Internal procedures
2. Approve the overall RecyClass budget
3. Approve new staff
4. Approve the creation of a new branch of RecyClass

2.4 TECHNICAL COMMITTEES (TCs)

Each branch of RecyClass is constituted by different TCs. Each TC is composed of 5 representatives:

- The chair or vice-chair of the corresponding PRE WG who will chair the TC,
- 2 additional representatives of recyclers appointed by PRE.
- 2 elected representatives of the AB.

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The Chair approves the participation of any additional plastics recyclers and Platinum members in the committee. Every representative of the TC is elected for 2 years. If a vacancy occurs before the end of the mandate, the departing representative is to be replaced preferably by someone who represents the same RecyClass Member, upon validation by the AB members. In the case no replacement is proposed by the RecyClass Member, or if opposition is received from the AB members, elections will be held to nominate a successor for the remainder of the mandate period. Each Platinum Member has one vote for the election of TC representatives. TC meets (physically or online) at least once every quarter in closed sessions. The TC chair can invite external experts and supporters, if required for specific topics or assessments. Confidential information shall only be discussed when an NDA is set in place with all present participants. The decisions of the TC shall be approved by a majority vote of the 5 representatives. If a participant cannot attend a decision-making meeting for any reason outside that meeting, a decision can take place via other means, such as phone or email. All requests for a decision should be returned within 2 weeks of receipt or the decision will be deemed to be accepted. The Chair will have the casting vote. A TC representative shall attend all meetings or present a justified excuse. If a TC participant disregards the duties of the group, the Chair reserves the right to appoint a substitute.

The meeting minutes will be circulated via email to the participants within 30 days of the meeting. Participants will have 2 weeks to submit comments/amendments to the RecyClass Team. After that period, the minutes will be deemed approved.

The TCs are established to:

- Update Design for Recycling Guidelines and RecyClass Online Tool where appropriate according to new findings with the support of the corresponding PRE WG.
- Submit opinions, proposals, and recommendations to the SB.
- Develop and publish Recyclability Evaluation Procedures where appropriate.
- Support the Certification Bodies in case of uncertainties.
- Conduct the technical aspects of the assessment procedure as described in the RecyClass Recyclability Approval Quality Management & Procedures document for Applicants of the Recyclability Evaluation Protocol.
- Assess plastic product concepts using the most recent available information and technical data.
- Issue technical opinions based on a review of test results and provide conclusions and recommendations (incl. communication).
- Create Working Groups on specific topics.

Each TC chair is established to:

- Chair TC meetings and lead assessment procedures for recyclability evaluations.
- Draft the agenda of the meetings together with the RecyClass Team.
- Approve drafted TC meeting minutes.
- Steer the work in the TC.

2.5 TASK FORCES (TFs)

A task force is a group of RecyClass experts established by the SB. A task force must have a specific mandate from the SB, that the group has to fulfil. All decisions of a task force must be validated by the RecyClass SB. Task forces are established for a defined period of time but can be reactivated regularly by the SB to follow up on any possible changes. The SB can dismiss a task force at any time.

The SB can, if necessary, appoint a Chair who is part of the AB and is elected by the AB for a period of 2 years and the SB defines the TF composition. The Chair of the TF steers the work in the TF and serves as a communication point between the TF, the AB, and the SB. For the RecyClass packaging branch, the Chair of Sorting and Claims TF has a seat in the corresponding RecyClass SB. If a vacancy occurs before the end of the mandate, the departing representative is to be replaced preferably by someone who represents the same RecyClass Member, upon validation by the AB members. In the case no replacement is proposed by the RecyClass Member, or if opposition is received from the AB

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members, elections will be held to nominate a successor for the remainder of the mandate period. Each Platinum Member has one vote for the election of the TF Chair.

A task force is established to:

- Following the mandate of the SB, address a specific topic and propose a solution.

Each TF chair is established to:

- Chair TF meeting
- Draft the agenda of the meetings together with the RecyClass Team.
- Approve drafted TF meeting minutes.
- Steer the work in the TF.
- Raise topics to TCs or AB when necessary.

2.6 WORKING GROUPS (WGS)

A working group (WG) is a group of RecyClass experts established by a TC to address a distinct topic. Working groups are established with a specific purpose (test campaign, alignment project, etc.) and are dissolved once the work is completed. Therefore, a working group is established for a temporary period of time with volunteered members and is directly related to a specific TC or TF.

A working group is established to:

- Following the proposal of a TC, address a specific topic with a temporary duration.
- Propose solutions and share them with the related TC or TF.

2.7 MEMBERS

Members are organisations which are actors of the plastic value chain (raw material producers, converters, brand owners, retailers, machine manufacturers/technology providers) and would like to work jointly with RecyClass to drive circularity. Members must submit a membership form specifying what branch of RecyClass they are applying for and must be approved by the corresponding RecyClass SB. Members can apply to both branches by paying an additional fee as defined by the Admin Council. Members can assign staff members as representatives to RecyClass TCs, TFs and WGs according to their membership category and upon signing an NDA. All representatives need to be covered by the NDA.

Members are established to:

- Raise topics of discussion to the TCs and AB.
- Support the discussions in the different TCs, TFs, WGs and AB (for Platinum members only)
- Promote and support RecyClass guidelines and methodologies among their stakeholders and/or collaborators.

2.8 RECYCLERS

Recyclers are organisations which are members of Plastics Recyclers Europe (PRE) and are willing to support RecyClass discussions with their expertise. Recyclers are appointed by PRE WG Chair based on their specific knowledge and their interest in joining RecyClass TCs, TFs and WGs. Recyclers need to be covered by an NDA to be part of the different group discussions. Recyclers can assign staff members, nominated by the PRE WGs, as representatives to RecyClass TCs, TFs and WGs. Recyclers' staff members appointed to RecyClass TCs, TFs and WGs must be recycling experts. Any company with recycling activities that are also active in plastic manufacturing, transformation, or distribution must submit a membership form to join RecyClass.

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2.9 SUPPORTERS

Supporters are non-profit organisations and Extended Producer Responsibility (EPR) schemes which are actively supporting and implementing the work done by RecyClass. Supporters must submit a letter of intent to the RecyClass SB who must approve their addition to the network. Supporters can join TC, TF and WG meetings of a specific RecyClass branch when covered by an NDA and accepted by the chair. Only staff members of the Supporter organisation are allowed to join TCs, TFs and WGs, while staff members from external companies participating in the Supporter activities are not accepted. Supporters can also join the AB meetings as guests of the chair. y. Supporters' participation is not subject to a fee and is open to any organisations which are not directly involved in plastic manufacturing, transformation, or distribution. Raw material producers, converters, brand owners, retailers, and technology providers are invited to join RecyClass as Members.

Supporters are established to:

- Raise topics of discussion to the TCs and AB.
- Offer counsel to the TCs and AB according to their area of expertise.
- Promote and support RecyClass guidelines and methodologies among their membership and/or collaborators.

2.10 RECOGNISED TESTING FACILITIES

Independent Recognised Testing Facilities are authorised to run the RecyClass Evaluation Protocols under the supervision of RecyClass. Requirements, qualifications, and conditions for Recognised Testing Facilities to conduct the Evaluation Protocols developed by RecyClass Technical Committees and Task Forces are defined in the RecyClass Recognised Testing Facilities - Procedures and Quality Management² document.

Recognised Testing Facilities meet every quarter to bring potential improvements to the Protocols and Quick Test Procedures developed by RecyClass. Recognised Testing Facilities can be invited to the TC meetings upon the approval of the chair. Recognised Testing Facilities are audited by RecyClass Team staff every 2 years and pay an annual fee of 1000 euros for the maintenance of activities and their recognition status.

The Recognised Testing Facilities group is established to:

- Suggest improvements to the RecyClass Protocols and Quick Test Procedures.
- Provide their expertise to the TCs in recyclability assessments when requested by the chair. This can include clarifications about the results, process or challenges found during the tests, as well as their expert opinion.

² [RecyClass Recognized Testing Facilities - Procedures and Quality Management](#)

2.11 CERTIFICATION BODIES (CBs)

Certification Bodies are independent organisations recognised to issue RecyClass Certifications according to the methodologies of RecyClass. Certification Bodies must sign a Partnership Agreement with RecyClass, and its auditors attend the RecyClass Auditors Recognition Course³.

Certification Bodies will meet at least once a year in order to bring their field experience to the continuous improvements of the RecyClass methodologies. Certification Bodies can be invited to Technical Committee meetings upon the approval of the chair. Certification Bodies pay an annual fee of 250 € per recognised active auditor within their organisation. Requirements to join can be found in the document *Requirements for Certification Bodies and Auditors* for the corresponding Audit Scheme.

The Certification Bodies group is established to:

5. Suggest improvements to the RecyClass Recyclability Methodology and Certification schemes.
6. Provide their expertise to the Technical Committees and Advisory Board when requested.

2.12 RECYCLASS TEAM

RecyClass Team staff is appointed to manage RecyClass on a daily basis and perform various administration tasks, communication, website, meetings organisation and NDA management. Additionally, the RecyClass Team also acts as an entry point for RecyClass users and Applicants of an assessment process.

2.12.1 COMMUNICATION & WEBSITE

- Maintain and update the RecyClass website and tools and ensure their proper functioning.
- Upload relevant documentation to the website as it becomes public, e.g., assessment results and updated documents.
- Promote RecyClass via RecyClass social media accounts.
- Write and publish press releases.
- Propose and organise events to promote RecyClass.

2.12.2 NDA MANAGEMENT

- Arrange and manage the content and signature of the NDA between Recyclers, Members or Supporters and RecyClass required to participate in TCs, TFs or WGs.
- Arrange and manage the content and signature of the NDA between the Applicant and RecyClass required to allow confidential information exchange between the Applicant and each TC. The Applicant reserves the right to exclude individual TC Representatives from the discussion by providing written notice. See more in the document *RecyClass Recyclability Approval – Quality Management and Procedures*.
- Make sure that all NDAs are set in place.

2.12.3 DOCUMENTS & ONLINE TOOL UPDATES

- Provide support to all RecyClass working groups in document management.

³ More information in the document '*Certification Bodies and Auditors Requirements*'.

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- If the Applicant of a recyclability evaluation requires amendments to the third-party agreement document, discuss the changes with a lawyer and have them agreed by the SB.
- Develop and update documents such as Recyclability Evaluation Protocols, Design for Recycling Guidelines, and position papers with the support of the TCs and the SB.
- Keep track of TC decisions and guidelines updates in a decision log.
- Update the RecyClass Online Tool based on the decision of the TCs.
- Maintain and update the certification schemes documentation.

The change management process of the recyclability requirements related to the Design for Recycling Guidelines, Online Tool and Recyclability Certification is defined in Annex I.

2.12.4 MEETINGS ORGANISATION

- Host and organise SB, AB, TC, TF and WG meetings.
- Prepare the agenda, the presentations, and record minutes of meetings.

2.12.5 CONTACT ENTRY POINT FOR RECYCLABILITY APPROVALS

- Ensure effective communication between the Applicant, TC and SB.
- Receive evaluation requests from potential Applicants, assess whether they fall within the scope of the Recyclability Evaluation Protocols, the Recyclability or Recycled Plastic Certifications, or the Letter of Compatibility and guide the Applicant in the application form submission.
- In the case of Recyclability Evaluation Protocols:
 - Provide the Applicant with the current TC member list. If the Applicant requests an individual TC member to be excluded from the discussion, exclude them from access to information related to that discussion and ensure that they are excluded from discussions on the specific application during meetings, e-mail exchanges and telephone conferences.
 - Provide the third-party agreement document to a recyclability evaluation Applicant to be signed by them and the SB chair.
 - Manage applications and act as a hub for information transfer between the Applicant and the TC, prompting the TC representatives for decisions and assisting in preparing final evaluation statements.
 - Ensure feedback to the Applicant and communication to other stakeholders, if applicable, as described in the RecyClass Recyclability Approval Quality Management & Procedures.
- In the case of Certifications or Letters of Compatibility, support the Applicant and the CB as reported in the Certification Quality Management & Procedures document of the corresponding audit.

3. MEMBERSHIP

3.1 ADMISSION PROCEDURE OF MEMBERS/SUPPORTERS

The admission of new Members or Supporters is subject to the following conditions:

- A written application must be sent to the registered office of the initiative.
- The application for entry will be submitted to the RecyClass SB for approval and must be accepted by an affirmative vote of the majority of the SB members. Candidates whose candidacy is not approved have the right to submit their comments in writing to the RecyClass SB, which must review them and give a written response.

3.2 RESIGNATION OF MEMBERSHIP

A Member has the right to resign the Membership at any time.

Resignation of Membership must be in writing and sent by registered mail to the registered office of the RecyClass initiative at least six months before the year-end of the current Membership. The resignation of a RecyClass Member only becomes effective on 31 December of the current year. If a resignation is notified less than six months before this date, the Membership can only cease at the end of the following year.

3.4 CHANGE OF MEMBERSHIP LEVEL

A Member has the right to change the level of the Membership (i.e. Bronze, Gold, Platinum) at any time.

Change of the Membership must be in writing and sent by registered mail to the registered office of the RecyClass initiative. The change of the level of the Membership from Platinum to Gold or Bronze and from Gold to Bronze must be notified at least six months before the year-end of the current Membership and only becomes effective on the 1st of January of the following year. If a change of the level of the Membership from Platinum to Gold or Bronze and from Gold to Bronze is notified less than six months before the end of the year, the membership level can only change at the end of the following year. The change of the level of the Membership from Bronze to Gold or Platinum, and from Gold to Platinum, can be notified at any time and become effective immediately to ensure the member can benefit from the change of the Membership level. The membership fee will be modified in accordance with the change.

3.5 EXTENSION OF MEMBERSHIP TO ADDITIONAL BRANCHES

A Member has the right to join more than one RecyClass branch, at any given time.

A Member has the right to join an additional RecyClass branch, at any given time. To become active in an additional branch, a Member will have to fill in a dedicated form provided by the RecyClass Team and send it to the registered office of RecyClass. The request to join the activities of an additional branch can be made at any time and will become effective upon the validation of the SB of the respective branch. The membership fee will be adapted in accordance with additional activities and within the given year that the extension is validated.

3.6 EXCLUSION OF MEMBERS/SUPPORTERS

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In any of the following cases, a Member/Supporter can be removed from RecyClass by the SB by following the procedures hereafter:

- The Member does not respect the obligation concerning the payment of the Membership fee (it does not apply to Supporters);
- The Member/Supporter does not respect or follow the Internal Procedures, or any other rule established by RecyClass and intended for all Members/Supporters of RecyClass;
- The Member/Supporter does not respect EU Competition Law.

The exclusion procedure is the following:

- 1) The RecyClass SB proposes the exclusion of a Member during a SB Meeting.
- 2) Before starting the exclusion procedure, the RecyClass SB must inform the Member/Supporter about its intention. The affected Member/Supporter has the right to be heard about their situation by the RecyClass SB and before the exclusion proposal is discussed by the SB.
- 3) The RecyClass SB will vote on the exclusion of the Member/Supporter, with an affirmative vote of a 2/3 majority of the SB Members. The decision of the SB must be justified.

In the case where a Member does not respect the payment obligations related to his Membership fee, the RecyClass SB has the right to cancel all rights of the Member in RecyClass, pending discussion about the Member's situation and the possible exclusion of the Member from RecyClass at the next TC or AB meetings as mentioned in the exclusion procedure.

4. ASSESSMENT PROCESSES

4.1 RECYCLABILITY

4.1.1 RECYCLASS TEST CAMPAIGNS

RecyClass is regularly conducting test campaigns under the validation by TCs or TFs. These test campaigns aim to evaluate specific plastic product technology or innovation categories to generate science-based data to further provide guidance towards their recyclability and circularity. Methodology, samples, and analyses of the results are managed by the corresponding TCs or TFs that coordinated the campaign. Members, supporters as well as external stakeholders can be part of the test campaign by either providing samples, internal studies, or expertise. These test campaigns can be totally or partially funded by RecyClass or a part of the industry. Timelines and goals are defined at the beginning of each new test campaign and shall be respected. In case of delay, e.g. for sample preparation, sample shipment, laboratory test, or data to be provided, RecyClass Team staff, as well as the RecyClass SB and TCs /TFs coordinating the test campaign, must be informed as soon as possible. Outcomes of test campaigns are used to update the Design for Recycling Guidelines, to develop new testing protocols or to provide new guidance to the industry through technical reviews.

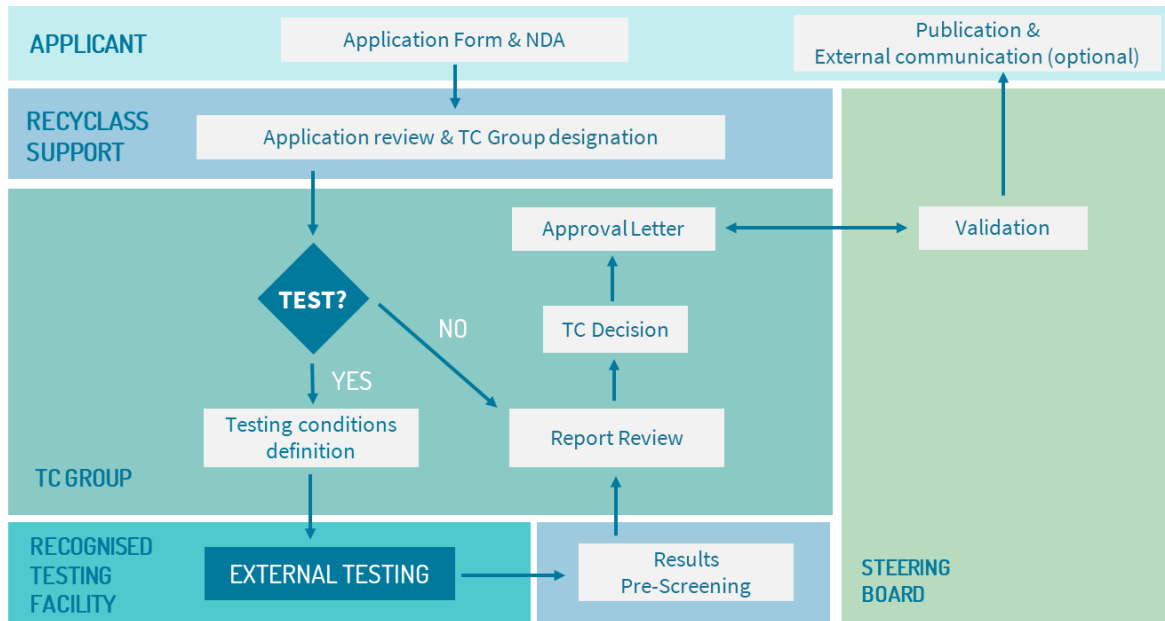
4.1.2 RECYCLABILITY APPROVALS

The Recyclability Evaluation Protocols aim to evaluate plastic product technologies or innovation materials to test and provide guidance towards their recyclability. The Protocols intend to provide clear and proven guidance on recyclability concerning plastic. Additionally, the Protocols aim to facilitate the introduction of innovative design of products without disrupting the currently established recycling streams.

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The Recyclability Evaluation Protocols will promote recyclability by encouraging the industry to test new plastic technologies, materials or products before market launch as well as giving advice and recommendations to Applicants. The general approval scheme is presented in Figure 3, while a more detailed explanation of the process steps is provided in the RecyClass Recyclability Approval Quality Management & Procedures document⁴.

Figure 3. Overview of the Assessment Process Steps for Recyclability Evaluation Protocols



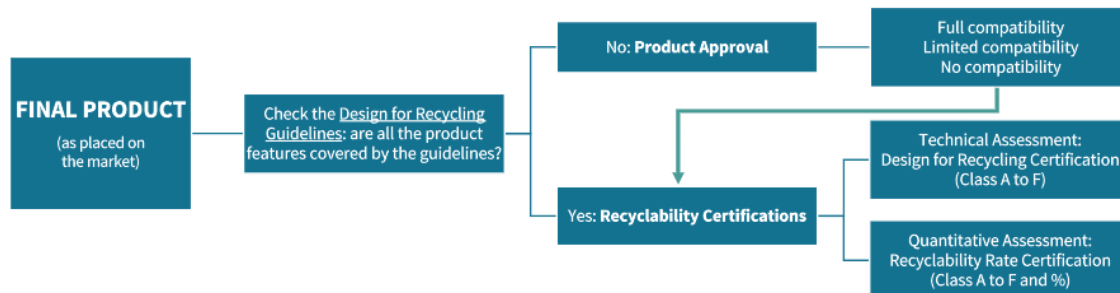
4.1.3 RECYCLABILITY CERTIFICATIONS

Final products that are entirely covered by the Design for Recycling Guidelines can be certified by a CB recognised by RecyClass to audit products following the Recyclability Certification Schemes. Two schemes were developed, as reported in the figure below.

⁴ [RecyClass Recyclability Approval Quality Management & Procedures](#)

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Figure 4: Overview of RecyClass Approvals and Certifications for Final products

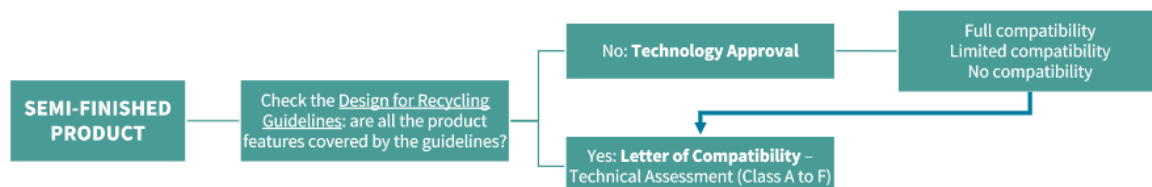


RecyClass Recyclability Certifications offer reliable assessments of the recyclability of a product design on the RecyClass Design for Recycling Guidelines⁵ and the RecyClass Recyclability Methodology⁶. The procedures of the scheme are detailed in the RecyClass Recyclability Certification Quality Management & Procedures document⁷.

4.1.4 LETTER OF COMPATIBILITY

Semi-finished products can also be evaluated according to the RecyClass Recyclability Methodology and the RecyClass Design for Recycling Guidelines by the CBs, who issue, in this case, a Letter of Compatibility. RecyClass Letter of Compatibility offers a reliable evaluation of the recyclability of a semi-finished packaging design. However, the letter is not a certificate and is destined for Business-to-Business communications only.

Figure 5: Overview of RecyClass Approvals and Evaluation for semi-finished products



4.2 RECYCLED PLASTICS

4.2.1 RECYCLING PROCESS CERTIFICATION

The RecyClass Recycling Process Certification recognises plastic recycling processes for pre- and post-consumer waste operating at a site. Certification against this Audit Scheme⁸ allows recyclers to demonstrate their contribution to the

⁵ [RecyClass Design for Recycling Guidelines](#)

⁶ [RecyClass Recyclability Methodology](#)

⁷ [RecyClass Recyclability Certification Quality Management & Procedures](#)

⁸ [RecyClass Recycling Process Audit Scheme](#)

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waste management of plastics and transparently communicate the origin of the waste. The Certification focuses on the verification of the origin of waste, the traceability throughout the recycling process and the calculation of recycled content in the output.

This Certification is granted based on the Audit Scheme requirements, and it is governed via the procedures described in the Certification Quality Management and Processes⁹. The Audit Scheme covers requirements to be met by organisations concerning traceability according to EN 15343:2007, quality management and environmental and administrative operating performance for the recycling of waste, as well as segregation and controlled blending chain of custody models as described in ISO 22095:2020.

Additionally, the Audit Scheme can be complemented with add-on Modules (Module A: Food Contact¹⁰, Module B: Cosmetics and Household Care Applications¹¹, Module C: Corporate Social Responsibility¹²). The Scheme is based on the international standard on chain of custody (ISO 22095), as well as the European standard on recycled plastics traceability (EN 15343:2007).

4.2.2 RECYCLED PLASTICS TRACEABILITY CERTIFICATION

The Recycled Plastics Traceability Certification recognises the use of recycled plastics in compounds, products or semi-finished products and is destined for companies using recycled material who want to guarantee the origins and traceability of their material along the whole value chain. The Certification focuses on the traceability of the material in the different process steps that must be verified throughout the whole chain of custody of the material. The Certification was created to harmonise the approach towards assessment of the recycled content of plastic products for companies making environmental claims.

The Certification is granted based on the Audit Scheme requirements¹³, and it is governed via the procedures described in the Certification Quality Management and Procedures¹⁴. The Audit Scheme assesses the traceability of recycled plastic material throughout all the steps of the value chain while verifying the origin of the pre- and post-consumer material in product claims. The Scheme is based on the international standard on the chain of custody (ISO 22095), as well as the European standard on recycled plastics traceability (EN 15343:2007).

⁹ [RecyClass Recycling Process Certification Quality Management and Procedures](#)

¹⁰ [RecyClass Recycling Process Certification Audit Scheme Module A: Food contact](#)

¹¹ [RecyClass Recycling Process Audit Scheme Module B: Cosmetics & Household Care Applications](#)

¹² [RecyClass Recycling Process Audit Scheme Module C: Corporate Social Responsibility](#)

¹³ [RecyClass Recycled Plastics Traceability Audit Scheme](#)

¹⁴ [RecyClass Recycled Plastics Traceability Quality Management & Procedures](#)

ANNEX I – CHANGE MANAGEMENT PROCESS OF THE RECYCLABILITY REQUIREMENTS

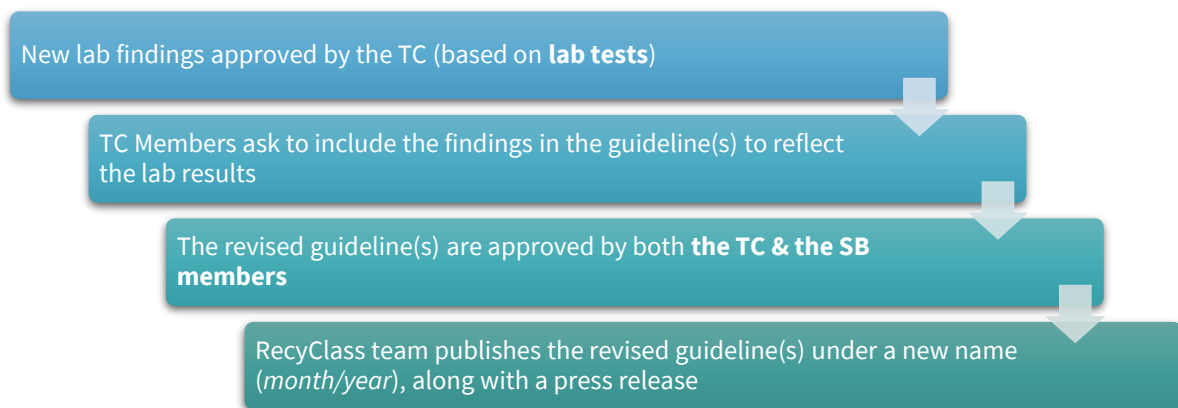
This annex lays out rules and procedures for the Change Management Process that apply to the Design for Recycling Guidelines, the Online Tool, and the Recyclability Certification. This process must be strictly followed by all involved actors, which includes Technical Committee members, Steering Board members, the recognised Certification Bodies, and the RecyClass Team.

DESIGN FOR RECYCLING GUIDELINES

The RecyClass Design for Recycling Guidelines are living documents, updated on a regular basis according to new lab tests and findings managed by the Technical Committees. The members of these Committees are responsible for developing their corresponding guidelines as reported in section 2.3. RecyClass intends to limit the number of updates to two revisions of the guidelines per year, in Q1 and Q3. For the RecyClass packaging branch, updating of the guidelines is limited to one per year from 2026, with the release to be expected in Q1.

Figure 5 represents the main steps of the change management process for updating the Design for Recycling Guidelines.

Figure 6: Change Management Process Overview – Design for Recycling Guidelines



NEW LAB FINDINGS EVALUATION

The evaluation of laboratory tests follows the procedures defined in the document “Recyclability Approval – Quality Management and Procedures”¹⁵. The TC members are responsible for the review of the laboratory evaluation report, within the timeframe and rules defined by the procedures.

PROPOSING GUIDELINES UPDATES

¹⁵ [Recyclability Approval – Quality Management and Procedures](#)

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After evaluating the laboratory results, TC members may request to revise the Design for Recycling Guideline(s) to reflect the new laboratory findings. The RecyClass Team is responsible for drafting a proposal for updated guidelines based on the TC decision.

The RecyClass Team circulates the proposal among all TC members to collect feedback. The revised guideline(s) can be shared internally inside member companies to consult additional experts. This revision lasts at least two weeks.

After the first round of comments, and if necessary, the RecyClass Team adjusts the proposal according to the received feedback. In case of additional modifications, the RecyClass Team circulates the guideline(s) for a last verification. One additional week is granted to the TC members to raise any comments.

APPROVAL OF NEW DFR GUIDELINES

Revised Design for Recycling Guidelines must be approved by both the TC and the corresponding SB, in the consecutive order. The guideline(s) is considered approved by the TC if no comment is received by the members within the given period and as defined in the previous section.

Upon the validation of the TC representatives, the proposal is submitted by the RecyClass Team to the corresponding SB for final approval.

RELEASE OF NEW DFR GUIDELINE

RecyClass intends to limit the number of updates to two revisions of the guidelines per year, in Q1 and Q3. For the RecyClass packaging branch, from January 2026 the guidelines will be updated once per year and released in Q1.

RecyClass Team drafts a press release to report the changes to the guideline(s) and the rationale behind the update. The press release is shared with the respective SB members for approval.

Once the press release is approved by the SB, the RecyClass Team publishes the new guideline(s) on the RecyClass website¹⁶ under a new name corresponding to the current month and year (*month/year*), along with the associated press release¹⁷ that is sent as well to the RecyClass network via email (i.e., RecyClass members, Online-tool users, and any other stakeholders willing to receive RecyClass news). Other external communications can be planned.

Any change in the guideline(s) must be linked to relevant and technical documentation that explains the tests performed and the results (e.g., hyperlinks to the corresponding approval letters and technical reviews).

THE ONLINE TOOL

The RecyClass Online Tool is a freeware that enables stakeholders to self-assess the recyclability of plastic products on the basis of the Design-for-Recycling Guidelines. The RecyClass Online Tool promotes recyclability and circularity by encouraging the industry to self-evaluate the compatibility of the different features constituting a plastic product while giving recommendations on how to improve product design to make it compatible with current recycling technologies. RecyClass Online Tool is developed as an educative and pedagogic tool and can only provide guidance

¹⁶ [RecyClass Design for Recycling Guidelines](#)

¹⁷ [RecyClass News](#)

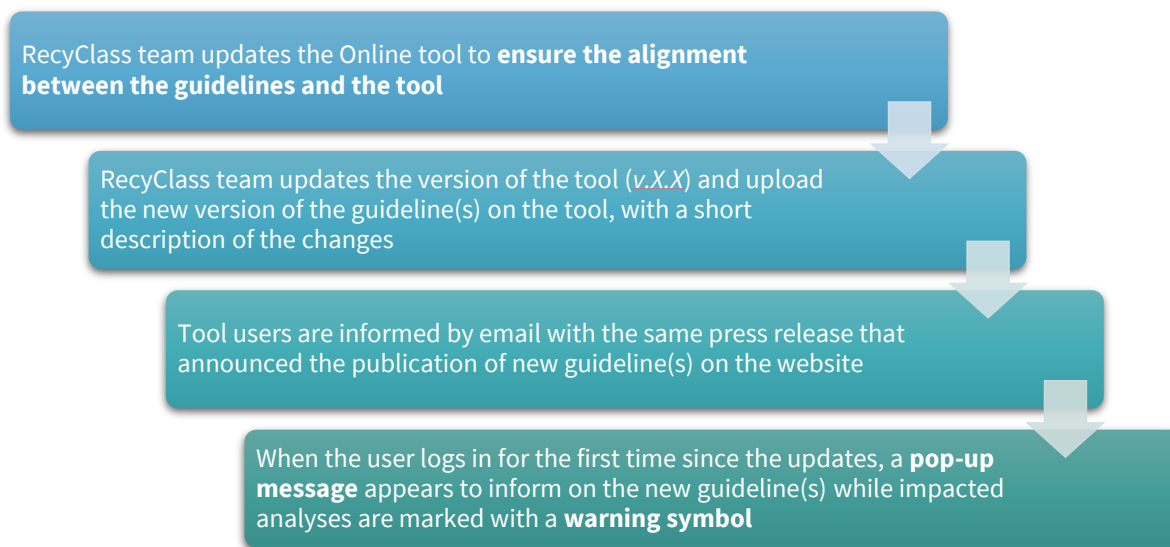
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to the users. In any case, RecyClass Online Tool should not be used to claim the plastic product's recyclability. Additionally, the RecyClass Online Tool provides a self-assessment report that can be used to start a Recyclability Certification process, following the Recyclability Methodology developed by RecyClass.

The RecyClass Team is responsible for updating the RecyClass Online Tool, based on the compatibility evaluations, the updates of the Design for Recycling Guidelines or the development of collection, sorting and recycling of plastics in Europe. Depending on the nature of the update, a specific approval process must be followed by the RecyClass Team.

Figure 6 represents the main steps of the change management process for updating the RecyClass Online Tool.

Figure 7: Change Management Process Overview – Online Tool



UPDATE OF THE ONLINE TOOL IN LINE WITH NEW GUIDELINES

In parallel with the publication of the new version(s) of Design for Recycling Guidelines, the RecyClass Team updates the Online Tool (e.g., implementation of new features, modification of the scoring for existing features). Alignment between the Guidelines and the Tool must continuously be ensured.

ONLINE TOOL VERSIONING & TRACKING OF UPDATES

The updates to the Online Tool are tracked via a changelog and software versions. Old and current versions of the Guidelines are stored on the *Versions* webpage of the Online Tool, which is available to all users willing to access and compare the various updates. The RecyClass Team is responsible for storing all versions and updating the tool versioning accordingly.

Any modification of the Tool leads to a new version (v.X.Y.Z) generated after the update and is described in the changelog available for all users ([Versions](#) webpage). Any update linked to the modification of the Guideline(s) impacts the second number of the version, as it may impact the recyclability results. The versioning rules are defined as reported in Table 1, as well as the necessary approval(s) to proceed with each update.

Table 1: Management of the Online Tool updates

RecyClass Online Tool version update	Nature of the update	Approval Process
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Version X	Structural modification(s) impacting the decision trees and the logic of the Tool	Approval required by the SB
Version X.Y	Answers and/or scoring modification(s) following the Design for Recycling Guidelines and potentially impacting the recyclability results	Approval required by the corresponding TC and by the SB
Version X.Y.Z	Editorial modification(s) not impacting the recyclability evaluation (e.g., updating of help boxes, mapping information, etc.)	No approval required. Managed by the RecyClass Team to facilitate the users experience

The version of the Tool is reported as well on each PDF report generated after having completed an analysis. Additionally, a page dedicated to the versioning should explain the update corresponding to the new version.

Moreover, RecyClass Team maintains up to date a table with the foreseen updates, based on the ongoing work and discussions within the RecyClass working groups¹⁸. This table is available for all Tool users and aims to inform them of a possible evolution of some features, as illustrated below.

Table 2: Foreseen guidelines and tool updates

Features under investigation	Investigation purposes	Foreseen updates	Timeline
Printing inks (direct printing) for polyolefin rigid	Understand the impact of the amount of inks (wt%) for the most common printing technologies	Reconsider the wt% limitation of inks on guidelines for coloured packaging	2025
Metallisation for flexible packaging	Understand the impact of vacuum-deposited metallisation on PE and PP flexible streams	New classification of metallisation for the flexible guidelines	Closed in 2023
...

COMMUNICATION TO USERS

As previously reported, a communication is sent to the RecyClass network – that includes the Tool users – informing them about the publication of new Guideline(s).



When the user logs in for the first time since the updates, a pop-up message appears to inform of the new Guideline(s) and list all changes. This message is stored with its corresponding Guideline(s) in the *Versions* webpage of the tool and can be found at any time by the users.

Moreover, at each connection, the Online Tool re-calculates all completed analyses of the users to verify if the scoring has been impacted by possible updates. As illustrated below, a warning symbol appears in front of analyses affected

¹⁸ RecyClass Workplan and foreseen updates accessible here: <https://recyclass.eu/tool/recyclass-workplan/>

by the updates, and that may lead to a different scoring. The user is thus invited to duplicate the completed analysis to re-run the self-assessment with the new tool version.

Figure 8: Illustration of the warning symbol for an analysis impacted by updates

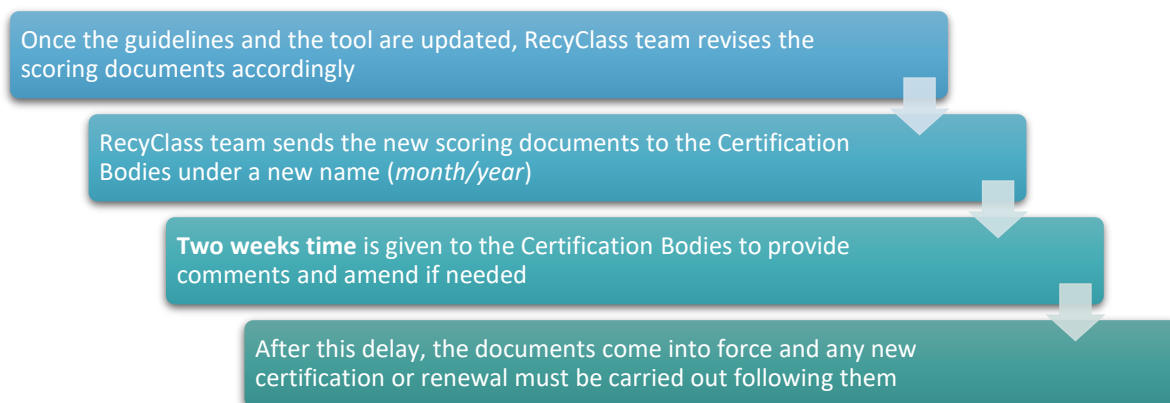
Date of the analysis	Name of the analysis	Result	Actions
2025-04-08 13:05:06	! test99		

METHODOLOGY OF THE RECYCLABILITY CERTIFICATION

The scoring of the Recyclability Certification is based on the Design for Recycling Guidelines and is aligned with the self-assessment results provided by the Online Tool. The change management process of the scoring documents for auditors is defined in the RecyClass Recyclability Certifications – Quality Management and Procedures¹⁹ document.

Figure 9 represents the main steps of the change management process for updating the scoring of the Certification Scheme.

Figure 9: Change Management Process Overview – Certification Scheme



AUDIT DOCUMENTS REVISION

Based on the updated Guideline(s), the RecyClass Team updates the document *Auditor guidelines & scoring tables* with the new lab findings. The revised document is sent to all auditors under a new name (*month/year*) for revision. Auditors are invited to provide comments within two weeks. If any amendment is required RecyClass Team modifies the document and re-circulates it to all auditors for two additional weeks. Without comments, the revised document is considered approved.

AUDIT DOCUMENTS IMPLEMENTATION

¹⁹ [RecyClass Recyclability Certifications – Quality Management and Procedures](#)

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Once the document *Auditor guidelines & scoring tables* is approved by all auditors, the document comes into force, and any new certification or renewal must be carried out in accordance with it.

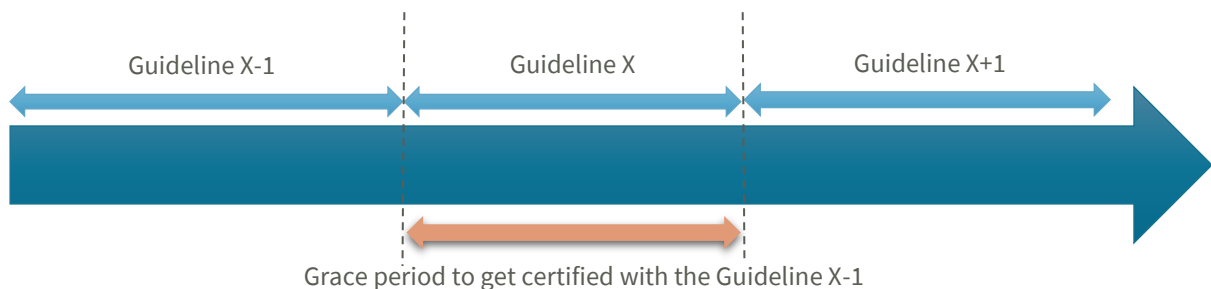
Any certification carried out with previous versions of the *Auditor guidelines & scoring tables* remains legitimate. The certificates are valid for three years, after which they will have to be renewed according to the new Guidelines and scoring tables. Terms of use and validity of the certificates are defined in the Quality Management and Procedures document.

However, the Certification Bodies are invited to notify to the certified companies of any possible changes that may impact the scoring of their plastic products.

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 10 illustrates the process of the grace period.

Figure 10: 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.

A derogation can be required by the Technical Committee when updating the guidelines in case the version X presents some technical challenges in terms of industrial application respect to the version X-1. The extra grace period should be based on the necessary time to implement a new solution on the market. In any case, the proposal for an extra grace period advanced by a TC should be validated by the SB and cannot overpass January 2030.

ANNEX II – CONTROL TABLE OF CHANGES

<i>Version</i>	<i>Date</i>	<i>Section</i>	<i>Update description</i>
4.1	March 2025	2.2 Annex I	AB composition Release of new DfR Guidelines Grace period
4.0	January 2025	All doc.	Update of RecyClass governance and structure Addition of membership level change. Addition of procedures for membership integration
3.3	April 2024	1.0	Addition reference to PRE Articles of Association
3.2	January 2024	2.1 to 2.4 4.1.1	Addition of procedure for replacement of a representative Addition of a section dedicated to RecyClass Test Campaigns Addition of machine manufacturers/technology providers as members
3.1	June 2023	2.6 & 2.7	Addition of Roles & Tasks of Members & Recyclers
3.1	June 2023	All doc.	Update the name of linked documents and editorial changes to the text
3.1	June 2023	2.11.2	Addition of tasks about NDAs
3.0	August 2022	2.0	Update the RecyClass structure and organisation
3.0	August 2022	3.2	Addition of the RecyClass Recycling Process Certification
3.0	August 2022	2.6	Laboratories replaced by Testing Facilities
2.4	January 2022	2.6 & 2.7	Accredited Laboratories & Certification Bodies renamed as Recognized
2.3	December 2021	2.1	Clarification for the minutes
2.3	December 2021	2.2	Clarification for the minutes and the role of AB chair
2.3	December 2021	2.3	Clarification for the minutes
2.3	December 2021	2.9.3	Wording clarification
2.3	December 2021	3.	Section on the online tool's update removed
2.3	December 2021	4.1.1 (ex-3.1.1)	Figure 2 revised
2.3	December 2021	Annex I	New annex defining the change management process for the guidelines, tool and certification

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