

A graphic of a recycling symbol, consisting of three curved arrows forming a triangle, is positioned on the left side of the slide. The text 'RecyClass' is written in a large, white, sans-serif font, and 'FOR BEGINNERS' is written in a smaller, white, sans-serif font below it.

RecyClass FOR BEGINNERS

Tracing Recycled Plastics in Food Contact Packaging

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RecyClass

RECYCLED PLASTIC VALUE CHAIN

RECYCLING
PROCESS

RECYCLED
PLASTIC
TRACEABILITY

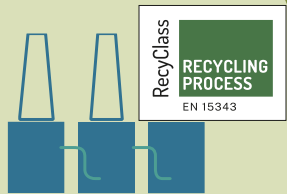
RECYCLASS CERTIFICATIONS FOR THE USE OF RECYCLED PLASTICS



**Certification of the recycling
process based on EN15343:2007.**



Trace the **use of certified
recycled input** for all actors.



RECYCLER



COMPOUNDER



TRADER



CONVERTER



PRODUCER

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WHAT IS MODULE A?

Module A describes a set of additional requirements for recycling processes producing a plastic input to be used in a decontamination process or a recycled plastic in line with the requirements of Regulation (EU) No 2022/1616.

It is an extension of the audit requirements of the schemes RecyClass Recycling Process and Recycled Plastics Traceability.

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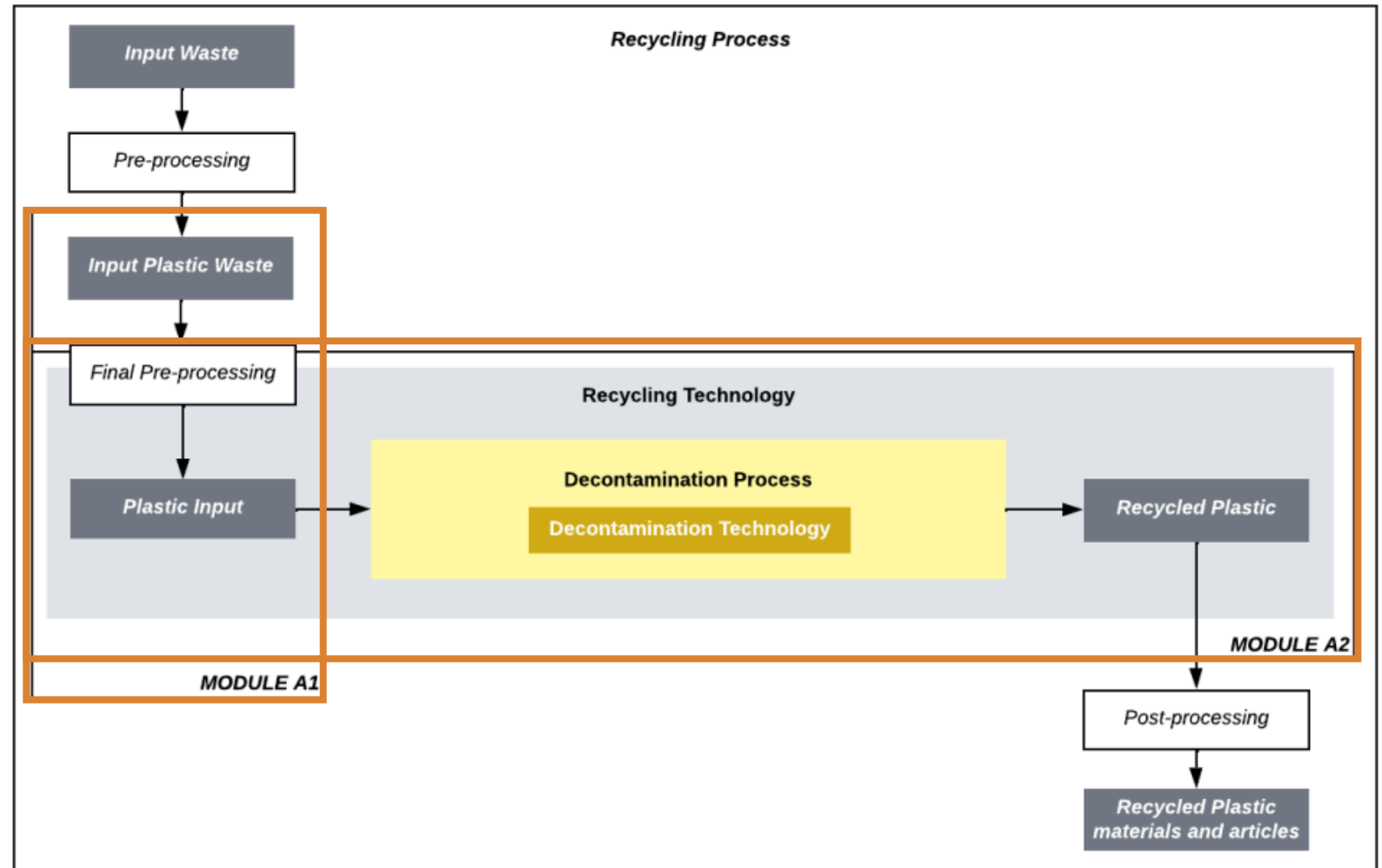
STRUCTURE OF MODULE A

Module A1

Requirements focusing on the treatment of input plastic waste in a final pre-processing operation and the production of an input for a decontamination process.

Module A2

Requirements focusing on the decontamination process of a plastic input into a food contact output using a suitable recycling technology.



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THE ELEGIBILITY
CRITERIA FOR
MODULE A



RecyClass | ELEGIBILITY FOR A CERTIFICATE

Organisations applying for certification with pre-processing operations or a decontamination process using a suitable recycling technology must extend the conformity of the general audit scheme requirements, traceability level 1 with this module.

Mandatory traceability level 1

No longer optional,
mandatory to extend the requirements to module A when it applies.

RecyClass | ELEGIBILITY FOR A CERTIFICATE

ELEGIBILITY FOR MODULE A1

All organisations with a final pre-processing operation that generate a plastic input for a decontamination process.

RecyClass | ELEGIBILITY FOR A CERTIFICATE

Example:

PET bottle recycler shredding, sorting and washing PET flakes and selling to a converter.



RecyClass | ELEGIBILITY FOR A CERTIFICATE

ELEGIBILITY FOR MODULE A2

Organisations using a novel technology in their decontamination process to produce a recycled plastic cannot obtain certification.

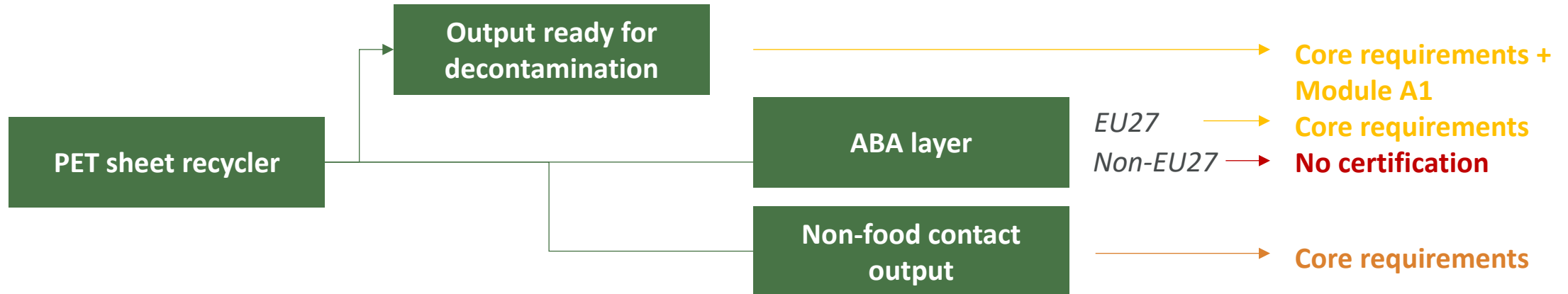
Companies based outside of the EU 27, Iceland, Liechtenstein, Norway, Switzerland, and the UK with food contact products produced with a novel technology cannot obtain a certificate for these products.

Exception for EU 27, Iceland, Liechtenstein, Norway, Switzerland and the UK for processes using a novel technology approach where Certification can be issued for the general audit requirements.

RecyClass | ELEGIBILITY FOR A CERTIFICATE

Example:

PET producer doing a PET sheet behind a functional barrier based in the EU vs PET sheet recycler based outside of the EU.



Example:

PS recycler for food contact with a novel technology.



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CORE REQUIREMENTS FOR
PRE-PROCESSING AND
RECYCLING ACTIVITIES IN
FOOD CONTACT
APPLICATIONS

Main goal: Ascertain the suitability of the plastic input for decontamination.

DETERMINING THE ORIGIN OF THE WASTE: MUNICIPAL ORIGIN

- Waste must originate from **municipal waste** or food retail or other businesses where it was only intended and used for contact with foods.
- **For Recycling Schemes** → Waste must originate from business to business or industrial sources that are part of the closed loop actors identified in the scheme. Waste must be recognizable and identified with a distinctive mark the recycling scheme marking.

RecyClass | KEY REQUIREMENTS IN MODULE A1

DETERMINING THE ORIGIN OF THE WASTE: SEPARATE COLLECTION

- Waste must originate from **separate collection**.
- Meaning that waste is collected **separately from residual waste**.
- The **collection system excludes hazardous waste**.

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

Proof of compliance:

- Declaration of the waste supplier and/or waste purchase specification; and
- Publicly available information of the Separate Collection system used in the waste collection as evidence.

RecyClass | KEY REQUIREMENTS IN MODULE A1

DETERMINING THE ORIGIN OF THE WASTE: REGULATION (EU) N° 10/2011

- Waste originates only from materials and articles manufactured in accordance with [Regulation \(EU\) No 10/2011](#) or [Regulation \(EU\) No 2022/1616](#).
- The recycler with waste originated outside of the EU27, Iceland, Liechtenstein, Norway, Switzerland, and the UK must provide **proof of equivalence of the national legislation of the waste's origin with Regulation (EU) No 10/2011.**

Proof of compliance:

- **Third party report confirming and providing evidence of equivalence** of a national legislation with Regulation (EU) N° 10/2011.
- The report must be **issued by a national competent authority** of the waste's country of origin; or
- The report must be issued by a third-party legal office and endorsed by a national competent authority.

RecyClass | KEY REQUIREMENTS IN MODULE A1

COMPOSITION OF A PLASTIC INPUT FOR DECONTAMINATION

- **Mechanical recycling of post-consumer PET** → Plastic input contains a maximum of 5 % materials and articles that were used in non-food applications.
- **Plastic from product loops** → The output of the pre-processing is produced from one polymer, or compatible polymers which were **used under the same conditions and obtained via the product loop**, which **excludes collection from consumers**.

Proof of compliance:

- Quality control system
- Plastic input characterization

RecyClass | KEY REQUIREMENTS IN MODULE A2

REGISTRATION IN THE UNION REGISTER

- **Mechanical Recycling of PCR PET** → The recycler is **listed in the Union Register with an active status**. The EC and Competent Authority were notified.
- **Recycling Scheme** → The recycler is also listed in the Union Register. There is a **single legal entity acting as the manager of Recycling Scheme** who is responsible for its overall functioning. The EC and Competent Authority were notified.

Proof of compliance:

- Name of the company in the Union Register
- Evidence of communication to the EC and CA.
- Registration numbers: RON, RIN, RFN.

RecyClass | KEY REQUIREMENTS IN MODULE A2

AUTHORISATION

- The recycler **applied to obtain an authorization decision** of a Recycling Process to the CA of a MS and received a response acknowledging the receipt of the application in writing.
- It received a **positive EFSA opinion** or a license agreement from a technology supplier.

Proof of compliance:

- Authorisation decision application and response in writing.
- Positive EFSA opinion.
- Authorisation number RAN or RSN (not available yet).

RecyClass | KEY REQUIREMENTS IN MODULE A2

COMPLIANCE MONITORING SUMMARY SHEET

- **Mechanical recycling of PCR PET** → The recycler **completed the CMSS**. The document describes the currently installed technology and its parameters. They obtained a **positive result on the CMSS audit from the CA within 1 year** from the start of production.
- **Recycling Scheme** → not applicable.

Proof of compliance:

- CMSS
- Proof of positive audit results by the CA.

RecyClass | KEY REQUIREMENTS IN MODULE A2

CRITICAL DECONTAMINATION OPERATIONS

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

Proof of compliance:

- Internal procedure in line with the CCP described in the EFSA opinion.

DECLARATION OF COMPLIANCE

- The recycler issues a **declaration of compliance** for all batches of recycled plastic, including instructions for converters and final users.

Proof of compliance:

- Declaration of compliance

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HOW MODULE A AND
REGULATION (EU) N°
2022/1616 ARE
RELATED

Module A was developed to offer reassurance to customers that material was treated with high standards, as well as to provide **proof of traceability and quality assurance** in line with the requirements of article 6 – requirements for collection and pre-processing.

Certification of food contact recycled plastics in line with Module A does not guarantee food contact approval.

Article 6

Requirements for
Collection and Pre-
processing activities
intended to be
recycled into food
contact plastics

→ Plastic waste originates from **municipal waste**.

→ Plastic waste originates from **materials and articles manufactured in line with Regulation (EC) N° 10/2011**.

→ Plastic waste is subject to **separate collection**.

→ The plastic waste shall be controlled throughout collection and pre-processing by means of **quality assurance systems and traceability**.

Article 6.3

The plastic waste shall be controlled throughout collection and pre-processing by means of quality assurance systems. The quality assurance systems shall:

- a) ensure the conditions and requirements set out in paragraph 1 and 2 are met;
- b) ensure traceability of each batch up to the point of the first sorting of collected plastic waste; and,
- c) **be certified by an independent third party.**

Articles 4, 5, 6 and 7 of Commission Regulation (EC) No 2023/2006 as well as point B of the Annex to that Regulation shall apply *mutatis mutandis* as regards good manufacturing practice, quality control and assurance systems and the relevant documentation.

RecyClass | REQUIREMENTS FOR INPUT & OUTPUT

Requirements included in **RecyClass Module A** checks the **suitability of a plastic input** for a decontamination process, the **quality assurance systems** of the pre-processing and decontamination operations, as well as the **quality controls of the outputs**.

Plastic input requirements in line with
Regulation (EU) No 2022/1616

Article 6



Specification (annex I, table 1 (5))



Authorisation

Recycled plastics requirements in line with
Regulation (EU) No 2022/1616

Intended use



Declaration of compliance



Labelling

KEY TAKEAWAYS

- **Module A is mandatory** for recyclers operating a pre-processing operation or a decontamination process for a suitable recycling technology.
- Module A does not cover **novel technologies**.
- **Module A offers reassurance** that a recycled plastic was treated with **high standards**, and provides **proof of traceability and quality assurance**.
- Module A1 covers **mandatory certification requirements** set forth in article 6 of Regulation (EU) No 2022/1616.



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FOR BEGINNERS

Questions & Answers

Use the Q&A box at the top-right corner of your screen

GET IN TOUCH WITH US!

info@recyclclass.eu

www.recyclclass.eu

RecyClass | UPCOMING WEBINARS

Science behind Recyclability

June 18: Science behind Recyclability: Navigating PET Thermoforms Recycling

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TO REGISTER



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Invite your colleagues to register to learn more about RecyClass & circular plastics!



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