

RecyClass

CERTIFICATION BODIES & AUDITORS REQUIREMENTS

RECYCLABILITY CERTIFICATION

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1. INTRODUCTION

This document lays down requirements, qualifications and conditions for Certification Bodies and recognized auditors of RecyClass Recyclability Certifications. As reported in the Recyclability Methodology¹, RecyClass counts with three types of recyclability assessments: the Design for Recycling, the Letter of Compatibility and the Recyclability Certification. The first two assessments are valid for all Europe, when the Recyclability Certification is country specific.

This document provides guidance to ensure that Certification Bodies and their auditors perform RecyClass audits in a consistent and independent manner, while respecting the integrity of the RecyClass Certification Schemes.

RecyClass audits are operated by recognized auditors within the Certification Bodies. Certification Bodies are recognized third-party conformity assessment bodies issuing a RecyClass Certification.

2. RECOGNITION OF CERTIFICATION BODIES

2.1 PROCEDURE

- 1) Applicant Certification Body submits its application request to RecyClass specifying its appointed auditors.
- 2) RecyClass evaluates each Certification Body according to the requirements set forth in this document. RecyClass may contact relevant institutions and organisations to ensure that the Certification Body complies with the requirements.
- 3) Upon acceptance of its application request, the Certification Body receives a template of the Cooperation Agreement and a Non-Disclosure Agreement with RecyClass that both parties shall sign.
- 4) Certification Body's auditors must attend the Recyclability Training Course and pass the exam to become recognised auditors. Each auditor must sign the Code of Conduct as referred in Annex 1 before issuing any Certificate.
- 5) The recognition of the Certification Body and its auditors will be communicated via the RecyClass official channels. The name, address and contact of the Certification Body will also be added to the list of recognised Certification Bodies available on the RecyClass website².
- 6) Any change within the Certification Body that would lead to non-compliance with the Cooperation Agreement must be communicated to RecyClass who will reevaluate the Certification Body compliance with the application requirements.
- 7) An up-to-date list of all Certification Bodies recognised to perform RecyClass Certification audits is available on the RecyClass website.

¹ RecyClass Recyclability Methodology document is available [here](#)

² List of recognized Certification Bodies available [here](#)

3. CERTIFICATION BODIES APPLICATION REQUIREMENTS

Certification Bodies must comply with the following requirements when applying to become a recognised Certification Body:

- Certification Bodies must be legal entities or defined as part of a legal entity.
- Certification Bodies must be competent organisations with demonstrated references in the field of plastics packaging and recyclability.
- Certification Bodies, or alternatively outsourced external laboratories, must have calibrated and functioning laboratory equipment³ in place to conduct Quick Tests⁴ and must demonstrate their technical competence in following the procedures.
- Certification Bodies must have mechanisms in place to ensure impartiality of the organisation and its auditors during the performance of their activities.
- Certification Bodies must have financial stability and must dispose of insurance or reserves to cover any liabilities arising from its operations.

Additionally, Certification Bodies recognised to issue Recyclability Certifications must:

- Be accredited for the relevant European standard on the basis of ISO/IEC 17065 by a National Accreditation Body signatory of the EA-MLA⁵; or alternatively IAF⁶.
- When the certification body carries out the rapid tests with its own means, it shall comply with the applicable requirements of ISO/IEC 17025. When subcontracting external laboratories to carry out the rapid tests, they shall demonstrate the necessary technical competence to perform the rapid tests, for which they must be accredited for the applicable rapid tests in accordance with the requirements of ISO/IEC 17025 by a national accreditation body signatory to the EA or ILAC multilateral agreement.

3.1 CERTIFICATION BODIES OPERATIONAL REQUIREMENTS & RESPONSIBILITIES

- Certification Bodies must be recognised by RecyClass; this procedure is official upon the signature of the Cooperation Agreement between both parties.
- Confidentiality between RecyClass and Certification Bodies, where applicable, must be guaranteed with the signature of a Non-Disclosure Agreement.

³ Beakers, stirrers, analytical balance, oven, moisture analyzer, strainer, cutting devices. Complete list available [here](#)

⁴ Quick Test Procedures available [here](#)

⁵ European Accreditation Multilateral Agreement

⁶ International Accreditation Forum

- Certification Bodies must have a quality management system in place which ensures compliance with the requirements laid down in this document. Procedures to identify and manage any non-conformities detected must be included along with a procedure to implement corrective actions.
- Certification Bodies are responsible for the competence and performance of its auditors. Certification Bodies must have in place mechanisms to ensure competence of all auditors. Certification Bodies must maintain updated records of education, training, and experience of all accredited auditors, which must be employed or under contract with the Certification Body. At least two auditors employed or under contract with the Certification Body should be recognized and active, in order to ensure the technical review of the audits.
- Certification Bodies and its auditors must attend the RecyClass Auditors Workshop organised annually where any new requirements or recent developments related to the Certifications are discussed.
- Certification Body's procedures and operations must be non-discriminatory and applicants should not be refused for any reason which is not detailed in this document or in the document "Quality Management and Procedures".
- Certification Bodies must ensure audits are conducted using RecyClass official templates at the time of the audit while referring to the most recent version of the RecyClass Recyclability Methodology, and any other relevant documents. Certification Bodies must maintain an active correspondence with RecyClass before and during the audit to request a certification code and share the final Certificate.
- Certification Bodies must properly record all issued RecyClass Recyclability Certifications and store internally the Audit Report, and any relevant related documentation for the duration of the certificate's validity.
- Certification Bodies remain responsible for the certificates they have issued until the certificate expires, the certificate is terminated by the Applicant, or the certificate is withdrawn by the issuing Certification Body.
- Certification Bodies must recognise and accept the validity of RecyClass Certificates issued by other recognised Certification Bodies. This recognition does not imply legal responsibility.
- Certification Bodies must appoint a lead auditor who will act as a contact person between RecyClass and the Certification Body ensuring a smooth communication between both organisations related to quality management, new applications, and recognized auditors.
- Certification Bodies must communicate to RecyClass if any changes to their accreditation takes place or if their home-National Accreditation Body withdraws accreditation.
- Certification Bodies must ensure that all auditors receive and understand any updates or communications from RecyClass.

3.2 CERTIFICATION BODIES GEOGRAPHICAL AREA

Certification Bodies must make reasonable endeavours to comply with the following requirements in order to be recognised to issue Recyclability Certifications:

1. Certification Bodies must demonstrate their knowledge of the plastic waste management system in the country of interest, including household collection and availability of sorting and recycling infrastructures.

2. Certification Bodies must ensure audits are conducted using the latest status of the plastic waste management system in place, using the information provided by RecyClass in the *Mapping of Plastic Waste Management Infrastructures in Europe*⁷ available online.
3. Certification Bodies must be based in the EU27+3 zone and have at least 2 auditors based in that geographical area to perform the audit and ensure the technical review.

4. AUDITOR REQUIREMENTS AND QUALIFICATIONS

To ensure a uniformly high standard of RecyClass Certification audits, auditors must meet the requirements listed below. Additionally, all auditors must have attended a RecyClass Auditors Training for Recyclability Certification Scheme and have passed the final exam.

4.1 TECHNICAL REQUIREMENTS

A recognized auditor under a Certification Body must comply with the following requirements:

- Technical knowledge about chemistry and physical properties of polymers.
- Technical knowledge about plastic packaging construction.
- Good understanding of the functioning of plastic recycling processes relevant to the RecyClass Certification application.
- Above-average knowledge of the main technical challenges for plastics recycling.
- Demonstration of competence by submitting proper documentation (e.g., CV, copies of certificates of all relevant academic and professional qualifications, work experience and experience as an expert, references, reports, training).
- Demonstration of sufficient practical experience in the field of activity and the scope of expertise.
- Above-average theoretical knowledge, practical skills, and the ability to carry out an expert opinion / study.
- The auditor must have access to the facilities necessary to fulfil the duties as an auditor.
- The auditor must be able to ensure all audits will not be bound by any instructions but independent work.

5. CERTIFICATION BODIES AND AUDITOR'S IMPARTIALITY

⁷ The mapping can be found here: [Mapping - RecyClass](#)

Certification Bodies and auditors must be independent and impartial organisations, with no conflict of interest with the applicant of a RecyClass Certification.

Certification Bodies must have mechanisms in place to identify and eliminate or minimise any risks to impartiality. Any risks must be communicated to RecyClass who will determine if the measures implemented are sufficient to continue operating as a recognised Certification Body. In addition, recognized auditors must sign and operate accordingly to the RecyClass code of conduct (Annex I). The Code of Conduct and this document are complementary.

Where the Certification Body is a part of a legal entity, it must ensure that separate activities do not compromise the independence of the Certifications.

6. BREACH OF THE COOPERATION AGREEMENT AND REMOVAL OF AUDITORS

Any non-conformities or non-compliant behaviour of the Certification Body or its auditors will be communicated to RecyClass immediately who will seek remedy for a period of three months.

If unsuccessful, RecyClass will present a dossier of non-conformities to the Steering Board who will assess and evaluate the Certification Body or its auditors in a one-to-one basis. RecyClass reserves the right to remove the recognition of an auditor or to terminate the Cooperation Agreement altogether between a Certification Body and RecyClass upon the outcome of the Certification Body or auditor evaluation. The Certification Body will have 60 days to appeal the final decision of the Steering Board.

On the other hand, a Certification Body may remove an auditor from the list of recognised auditors or terminate the Cooperation Agreement with RecyClass by sending an email to info@recyclclass.eu. The name of the Certification Body will be removed from the RecyClass website.

RecyClass shall notify the relevant NAB if the recognition of a Certification Body regarding the RecyClass Recyclability Certification is withdrawn. In this case, the pertaining accreditation will be revoked.

7. FREE COMPETITION AMONG CERTIFICATION BODIES

Companies who request a RecyClass Certification may freely contract any Certification Body listed on the RecyClass website operating in the country or group of countries for which the Certificate has been requested. Applicants may also choose to change from one Certification Body to another to recertify their package.

In case of the recertification of a package with a different Certification Body, the new Certification Body must receive all relevant documentation and reports from the previous audit which must be considered during the recertification process. This information must be provided by the applicant.

8. ANNEX I: CODE OF CONDUCT AGREEMENT

The below-signed auditor personally, voluntarily agrees to implement the following Code of Conduct Agreement to govern the future conduct in connection with the RecyClass Certification:

STATEMENT

The auditor in promoting high standards of code of conduct shall:

- 1 Act solely in the best interest of RecyClass, and the Audited Company, in the performance of his/her duties.
- 2 Conduct itself professionally, with truth, accuracy, fairness and responsibility.
- 3 Not misrepresent his/her qualifications, competence or experience.
- 4 Nor undertake assignments beyond his/her capabilities.
- 5 Treat in a Confidential manner all Confidential information, unless authorised in writing to disclose such information by the company.
- 6 Confidential Information' shall mean any and all information provided to the Auditor for the purposes of his assignment for RecyClass and the Audited Company, except for information which it can be shown by the Auditor, that is:
 - a. already or hereafter becomes part of the public domain by publication or otherwise than through the breach of this agreement by the Auditor, or
 - b. already in the possession of the Auditor prior to the receipt of the information from RecyClass or the Audited Company, or
 - c. lawfully acquired by the Auditor after the time of disclosure hereunder from a third party with full rights of disclosure.
- 7 Will not disclose any details of audit findings outside of the organisation, neither during nor after the audit process.
- 8 Not intentionally communicate false or misleading information which may compromise the integrity of the certification processes.
- 9 Be able to act professionally under adverse pressure from companies being audited.
- 10 Inform RecyClass about any change in his/her employment position.
- 11 Report to RecyClass any new, updated or withdrawn audit.
- 12 Use the reference codes provided by RecyClass in order to issue a Certificate and Audit Report.
- 13 Implement all third-party auditor recommendations.

CONFLICTS OF INTEREST

The auditor will perform his/her duties conscientiously, honestly, and in accordance with the best interests of RecyClass. The auditor must not use his/her positions, or the knowledge gained as a result of their positions for direct or indirect personal advantage. Regardless of the circumstances, if the auditor senses that a course of action he/she has pursued or he/she is presently pursuing or is considering pursuing may involve him/her in a conflict of interest with RecyClass and/or Audited company, he/she should immediately communicate all the facts to the Certification Body, RecyClass and audited company.

ENFORCEMENT AND COMPLIANCE

During the audit process, the Code of Conduct and Requirements for Certification Bodies and auditors described in the document “Certification Bodies and Auditors Requirements” is the accepted practices that surround the recognized auditor. Violations of these are considered to be serious in nature and will result in swift intervention by RecyClass according to section 6 of the document “Certification Bodies and Auditors Requirements”.

All sanctions against an Auditor or its Certification Body will involve a full investigation before any actions are taken. RecyClass is not required to apply progressive discipline in situations which are serious in nature and warrant severe non-financial penalties up to and including permanent removal of the auditor accreditation.

The auditor will cooperate fully with an inquiry in the event of a breach of this Code of Conduct.

GENERAL

The obligations and commitments mentioned in this document bind the Auditor personally, independently of his position as an appointee (employee, self-employed or otherwise) representing a company.

The non-disclosure obligations contained in this document do not end when the Auditor would lose his capacity of Auditor or when the agreement in general would be terminated in any way whatsoever.

For RecyClass:

Signature:

Name:

Address:

Date:

The auditor:

Signature:

Name:

Address:

Date:

9. ANNEX II: TABLE OF CHANGES

<i>Version</i>	<i>Date</i>	<i>Section</i>	<i>Update description</i>
3.0	January 2026	1, 2, 3	Changes in the requirements for CBs to issue Recyclability Certification in the EU27+3 market.
2.3	March 2025	All document	Changes of the wording on the Recyclability Certification, clarification on the location of the CBs
2.2	June 2024	1	Specification on the typologies of recyclability assessments
2.2	June 2024	2	Wording clarification
2.2	June 2024	3	Additional requirements for Certification Bodies and auditors. Clarification about accreditation requirements and requirements for Quick Test Procedures.
2.2	June 2024	6	Clarification regarding the obligations of NABs
2.2	June 2024	8	New version of the Code of Conduct

<i>Version</i>	<i>Date</i>	<i>Section</i>	<i>Update description</i>
2.1	January 2022	1	Clarifications relating to the types of recyclability certifications and their scope.
2.1	January 2022	2.1	Additional requirements relating to the accreditation procedure and the request to extend the geographical area
2.1	January 2022	3.2	New section relating to the geographical area and the requirements the Certification Bodies must comply with.

<i>Version</i>	<i>Date</i>	<i>Section</i>	<i>Update description</i>
2.0	July 2021	3	Additional requirements relating to accreditation of Certification Bodies according to ISO/IEC 17065
2.0	July 2021	3.1	Addition of clarifications such as signature of the Cooperation Agreement. Addition of requirements – recognition of other issued certificates, communication with RecyClass.
2.0	July 2021	6	Editorial changes

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