

TECHNICAL CIRCULAR**Ref. DC2026MGR004****Milan, 12-01-2026**

To all accredited and applicant Certification Bodies
To the associations of Conformity Assessment Bodies
To all DCI Assessors/Experts

SUBJECT: Technical circular DC N° 01/2026 - Provisions regarding accreditation for the scheme PRD- RECYCLASS - RECYCLING PROCESS CERTIFICATION.

Introduction

The EU adopted a European Plastics Strategy in January 2018. It is part of the EU's Circular Economy Action Plan and is based on existing measures to reduce plastic waste.

The CPA (Circular Plastics Alliance), envisaged by the European Commission in its Communication regarding the [European Strategy for Plastics](#), was established in 2018 with the goal of using at least 10 million tonnes of recycled plastic in the EU by 2025. It brings together nearly 300 parties: companies, academic institutions, and public sector stakeholders involved in the plastics and recycling value chain. The CPA is also responsible for recording data on the use of recycled plastic at the European level.

The volumes of pre- and post-consumer recycled plastics present in new products thus contribute to achieving the target announced by the European Commission under the CPA of using 10 million tonnes of recycled plastics in new products by 2025.

The RecyClass scheme - Recycling Process Certification, which was developed by the scheme owner Plastics Recyclers Europe AISBL (an international non-profit association with registered office in Belgium), assessed by the Spanish Accreditation Body (ENAC) according to the requirements of the document EA-1/22, and accepted at EA level, is based on the traceability of the recycled plastic used and the verification of the pre-consumer and/or post-consumer recycled content (proportion of recycled material in the mass of a product or packaging). It was developed taking into account the requirements of the standard EN 15343 "Recycled Plastics". The certification scheme evaluates the traceability of a recycling process and the use of recycled content in the finished product.

In the case of products or packaging, the certificate issued is the certification of traceability of recycled plastics, which evaluates the traceability of post-recycling processes and the transparent use of recycled content in products.

Traceability of the recycling of plastics and conformity assessment and content of recycled products and of the standard ISO 22095 "Chain of custody - General terminology and models," following, in particular, the principles of segregation and of controlled mixing models.

Recycling Process certification verifies the point of origin for the chain of custody of recycled plastics, verifying the origin of waste, ensuring traceability throughout the recycling process, and calculating the outgoing recycled content.

Certification of the RecyClass recycling process enables recyclers to demonstrate the traceability of plastic recycling and to transparently communicate the origin of waste, providing all stakeholders in the plastics value chain with a continuous incentive to use recycled plastics.

Certification rules

Scheme requirements	<p>The scheme requirements are contained in the document RecyClass Recycling Process Certification - Audit scheme v 1.1.</p> <p>The requirements in the Audit Scheme are divided into 9 Sections and some Modules for additional requirements (Module A: requirements for recycled materials intended to come into contact with substances for human use in accordance with Regulation EU 1616/2022; Module B: requirements for materials intended for application in the cosmetics sector; Module C: requirements regarding Corporate Social Responsibility; Module D: requirements for PVC materials.</p>
Parties which may request certification	<p>Certification can be requested by recyclers possessing processes capable of recycling pre-consumer and/or post-consumer plastic waste into new plastic products, along with the necessary authorizations.</p> <p>Certification Bodies notify RecyClass of each new certification request, specifying the company name, the scheduled audit date, and the request for a certification code.</p> <p>RecyClass will subsequently assign a code (RC00XX-COMM-YY-CBS-AN) that must be included on the Audit Report and the related Certificate.</p> <p>The Certification Body creates a code for the new client as follows:</p> <ul style="list-style-type: none">• XXXX - 4-digit code provided by RecyClass• MM - month of expiry of the certificate• YY - year of expiry of the certificate• XXX - code of the Certification Body• XX - initials of the auditor <p>If necessary, RecyClass will provide a third-party code for verification of the audit report.</p>

Competence criteria of the audit team	<p>The knowledge and competence requirements and the qualification maintenance criteria for auditors are defined in the document “Certification Bodies & Auditors Requirements v 1.1”.</p> <p>In order to obtain RecyClass recognition, auditors must demonstrate:</p> <ul style="list-style-type: none"> • Technical knowledge on plastic recycling; • Technical knowledge on the traceability of recycled plastics as described in the standard EN 15343:2007; • Good understanding of the chain of custody model as described in the standard ISO 22095:2020; • Theoretical knowledge, practical skills and ability to conduct an on-site audit. <p>Competence must be shown by submitting appropriate documentation (e.g., CV, copies of all relevant academic and professional qualifications, work experience and experience as an expert, references, training, etc.).</p> <p>Auditors must sign the RecyClass Code of Conduct and attend and pass the final exam of the RecyClass auditor training course for the recycling process audit scheme in order to be included in the list of auditors recognized by RecyClass.</p> <p>To maintain their qualification, recognized auditors must attend annual RecyClass auditor workshops, which discuss new requirements or recent developments related to certification. At least one auditor from each Certification Body must participate annually.</p> <p>In cases of an inactive auditor, RecyClass will evaluate the auditor's competence and, if necessary, require the auditor to attend a RecyClass auditor training course.</p>
Competence criteria of decision makers	<p>RecyClass does not require specific competence criteria for decision makers.</p> <p>A recognized auditor of the Certification Body, who did not participate in the on-site audit, will review the Audit Report (and additional documentation, if necessary) to ensure that it provides adequate and effective evidence of compliance with the requirements specified in the Audit Scheme.</p> <p>If the outcome is positive, the recognized auditor makes the decision, on behalf of the CAB, to issue Certification.</p>
Audit times	<p>The on-site audit will have a minimum duration of one day. The duration of the audit may vary depending on the number of recycled outputs audited, the size of the site, or the complexity of the process.</p>
Assessment of multi-site organizations	<p>Multi-site certification must be performed for a recycling process/operation within two or more separate sites under the same ownership. The recycler must designate one site as the main site for certification purposes. All sites must be visited during the on-site audit.</p>
Modalities of performance of the audit	<p>For the audit modalities, refer to the provisions contained in the RecyClass document “QUALITY MANAGEMENT & PROCEDURES paragraph 10 “Certification Procedure”.</p>

	<p>Initial certification must be performed for a recycling process/es within a site that can present production records for the previous 12 months (Initial audit) or 3 months (Provisional audit) of activity.</p> <p>Findings raised during audits are classified into two different categories:</p> <ul style="list-style-type: none"> • Nonconformity; • Comment. <p>The criteria for classifying non-conformities are specified in the document RecyClass Recycling Process Certification-Audit scheme v 1.1 in paragraph 12 "Non-conformities".</p>
Issuance of the certificate	<p>The Certificate must report the address of the site where the audited Recycling Processes and Recycled Outputs were produced.</p> <p>The certificate is automatically generated by the Audit Tool developed by RecyClass.</p> <p>The applicant will be included in the list of certified companies on the RecyClass website.</p> <p>For the modalities of use of the RecyClass mark, refer to the provisions contained in the RecyClass document "QUALITY MANAGEMENT & PROCEDURES, paragraph 16 "Use of Certification Mark."</p>
Certification validity	<p>The validity period of the certification and the right to use the RecyClass mark and references to the RecyClass certification is limited to one year from the date of issuance, provided that no significant changes are made to the certified process or products.</p> <p>To renew the validity of the certification, a surveillance/monitoring audit must be conducted once a year.</p> <p>Surveillance/monitoring audits must be conducted six weeks before the expiry date. If the certification has a positive outcome, its validity will be renewed for an additional year. In justified cases, Certification Bodies may grant certificate validity extensions using the RecyClass tool. Extensions can be granted for a maximum period of two months. Extension of a certificate's validity will not change the validity date for the subsequent period.</p>
Product recertification	<p>Certification Bodies must recognize and accept the validity of RecyClass Certificates issued by other recognized Certification Bodies for the purposes of any product recertification request with another Certification Body.</p> <p>Applicants may choose to switch from one recognized Certification Body to another to recertify their product.</p> <p>If a product is recertified with a different Certification Body, the new Certification Body must receive all relevant documentation and previous audit reports, which must be considered during the recertification process.</p>

Rules for Accreditation/Extension

Accreditation Standard: UNI CEI EN ISO/IEC 17065:2012

Certification Bodies may apply for accreditation for the scheme after being recognized and included in a specific list by RecyClass and having signed a cooperation agreement with them.

The requirements for Certification Bodies are contained in the document "Certification Bodies & Auditors Requirements v 1.1". Specifically, Certification Bodies must have a quality management system that ensures compliance with the requirements set out in this document. Certification Bodies must appoint a lead auditor who will serve as the contact person between RecyClass and the Certification Body, ensuring communication between the two organizations regarding the status of the quality management system, new requests, and auditors.

The main requirement for Certification Bodies to obtain recognition by RecyClass is accreditation in accordance with the standard UNI CEI EN ISO/IEC 17065:2012.

If the CB already holds accreditations issued by other Accreditation Bodies, a case-by-case assessment must be conducted based on the applicable EA/IAF MLA agreements.

The prerequisites set out in the ACCREDIA Regulations RG-01 and RG-01-03 for granting and extending accreditation remain unchanged, supplemented by the following rule.

A	CB already accredited according to UNI CEI EN ISO/IEC 17065:2012	<ul style="list-style-type: none">• Document review of 1 day (to be conducted, at least partly, by remote mode).• 1 witnessed assessment of appropriate duration to the client's organizational size. ACCREDIA reserves the right to evaluate the suitability of organizations and audit teams on a case-by-case basis.
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Documentation to be submitted to ACCREDIA for document review

- Procedure for selecting, qualifying, and monitoring auditors, decision makers, and contract reviewers.
- CVs of auditors and decision makers, justifying their individual qualifications, e.g., through a qualification form.
- Guideline or Instruction made available by the CB for the audit team.
- Certification regulation that includes the contractual conditions for the purpose of issuing and maintaining certification under accreditation (including the obligations defined in this Circular).
- Technical-commercial procedures for defining the duration of audits, the sampling of sites, and defining the commercial offer.
- Fax of the certificate issued by the CB.
- List of certificates already issued, and of upcoming audit activities, (data necessary for planning the witnessed assessment).

Maintenance of accreditation

For maintenance of accreditation, the following assessments will be conducted throughout the accreditation cycle, except in special circumstances (e.g., handling of complaints and remarks, changes to the certification scheme, changes to the organization's structure, or other similar situations):

- If the CB has issued fewer than 50 certificates in the certification scheme, the accreditation maintenance program will include 1 witnessed assessment and 1 assessment at the CB's head office;
- If the CB has issued from 51 to 200 certificates in the certification scheme, the accreditation maintenance program will include 2 witnessed assessments and 1 assessment at the CB's head office.

Certification Bodies must communicate to RecyClass any changes to their accreditation status or if ACCREDIA imposes any sanctions provisions against them.

With kind regards.

Dott.ssa Mariagrazia Lanzanova

Vice Director

Department of Certification and Inspection