RecyClass

AUDIT SCHEME

MODULE D: PVC REQUIREMENTS

RECYCLING PROCESS CERTIFICATION

RECYCLED PLASTICS

VERSION 1.0

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1. INTRODUCTION

Module D describes a set of requirements for *Recyclers* using rigid PVC *Input Plastic Waste* under the scope of Regulation (EU) 2023/923 regards lead and its compounds in PVC (later referred to in this document as the Regulation) which entered into force on the 28th of May 2023. This module is mandatory for *Recyclers* of post-consumer PVC *Input Plastic Waste* under *Regulation.*

In case of PVC *Input Plastic Waste* under the umbrella of the derogation described in Article 18, controlled loop requirements apply for types of products described in the categories included in Table 1 until the 28th of May 2033. Controlled loop requirements do not apply to PVC Input Plastic Waste with a lead concentration lower than 0,1% by weight.

Table 1. Categories with types of products - Controlled loop requirements (rigid PVC *Input Plastic Waste* with lead concentration < 1.5% by weight of rigid recovered PVC)

a) profiles and sheets for exterior applications in buildings and civil engineering works, excluding decks and terraces;

b) profiles and sheets for decks and terraces, provided that the recovered PVC is used in a middle layer and is entirely covered with a layer of PVC or other material for which the concentration of lead is lower than 0,1 % by weight;

c) profiles and sheets for use in concealed spaces or voids in buildings and civil engineering works (where they are inaccessible during normal use, excluding maintenance, for example, cable ducts);

d) profiles and sheets for interior building applications, provided that the entire surface of the profile or sheet facing the occupied areas of a building after installation is produced using PVC or other material for which the concentration of lead is lower than 0,1 % by weight;

e) multi-layer pipes (excluding pipes for drinking water), provided that the recovered PVC is used in a middle layer and is entirely covered with a layer of PVC or other material for which the concentration of lead is lower than 0,1 % by weight;

f) fittings, excluding fittings for pipes for drinking water.

PVC Recycled Output originating from a) to f) type of products must only be used for any type of products in categories a) to f). As from the 28th of May 2026 (36 months after the implementation of Regulation) PVC Recycled Output originating from a) to d) must only be used for type of products in any of the categories a) to d).

2. DEFINITIONS

Definitions of the *Recycled Plastics Traceability Audit Scheme* apply in addition to the ones found in this section.

Controlled loop for PVC
Process in which rigid PVC recovered from the categories of articles referred to in points (a) to (d) listed in Regulation (EU) 2023/923 must only be used for the production of new articles of any of those categories. Transition period applies until the 28th of May 2026 as described in Regulation (EU) 2023/923 in which PVC recovered from the categories of articles referred to in points (a) to (f) must be used for the production of new articles of any of those categories. [Regulation (EU) 2023/923]

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3. MODULE D: PVC REQUIREMENTS

The following requirements are complementary to the ones described in the Audit Scheme.

SECTION D.1 *INPUT PLASTIC WASTE*

D.1.1 WASTE COMPOSITION

In addition to the origin of waste (pre-consumer or post-consumer) and source of waste (household, commercial, industrial, other), Input Plastic Waste must be identified by sector (Packaging, B&C, WEEE, ELV, Agriculture) and type of application. The type of application must specify if the *Input Plastic Waste* composition includes Pipes, Sheets and Profiles or other.

Assessment level Category 1

D.1.2 STORAGE CONDITIONS

PVC *Input Plastic Waste* originating from types of products listed in categories a) to f) in Table 1 must be segregated from other *Input Plastic Waste*. As from the 28th of May 2026, types of products listed in categories a) to d) listed in Table 1 must be segregated from other *Input Plastic Waste.*

Assessment level Category 1

SECTION D.2 *RECYCLED OUTPUT*

D.2.1 CONTROLLED LOOP – END MARKETS

Controlled loop requirements apply under the scope of the Regulation for types of products listed in Table 1 with a lead concentration between 0,1 and 1,5% by weight. No *Controlled Loop* requirements apply to PVC *Recycled Output* with a lead concentration lower than 0,1% by weight.

When *Controlled Loop* requirements apply, PVC *Recycled Output* originating from types of products listed in categories a) to f) can only be used for those applications. As from the 28th of May 2026, types of products listed in categories a) to d) can only be used for those applications.

Assessment level Category 1

D.2.2 COMPLIANCE DOCUMENTATION

Recycler must communicate to their customer the lead concentration by weight in their *Recycled Output.* This information can be included in the Safety Data Sheet or alternatively in the Technical Data Sheet as long as the document is shared with the *Recycled Output.*

Information must include:

- The origin of *Recycled Output* is described according to the requirement D.1.1;
- Lead concentration of *Recycled Output* (recovered PVC) and the used analytical method; alternatively, communication about obligation to test lead concentration of the recovered PVC by the customer.

The document must be reviewed at least once a year.

Assessment level Category 1

SECTION D.3 QUALITY MANAGEMENT

D.3.1 TRACEABILITY

When *Controlled Loop* requirements apply, PVC *Plastic Waste Input* originating from types of products categories listed in Table 1 must be separately traceable at *Recycler* throughout *Recycling Process* from other *Plastic Waste Input.*

As from the 28th of May 2023 (36 months), PVC *Plastic Waste Input* originating from types of products listed in categories a) to d) of Table 1 must be separately traceable at *Recycler* throughout *Recycling Process* from other *Plastic Waste Input.*

Assessment level Category 1

D.3.2 MONITORING OF LEAD CONTENT

There is an internal procedure in place to monitor the concentration of lead in PVC *Recycled Output* to ensure that it is lower than 0,1% or 1,5% by weight. The procedure describes the size and frequency of sampling depending on the *Plastic Waste Input*. Records of analysis are stored internally.

The methodology includes the use of a handheld XRF for the quantification of the chemical elements in PVC. Alternatively, the methodology uses an ICP measurement. The measurement equipment (XRF or ICP) is calibrated yearly. In case of an XRF method: PVC is injection moulded or extruded to maximize the representativeness of the results; Staff members performing the test have received a radiation training.

Alternatively, samples of PVC *Recycled Output* are sent to an external laboratory for the measurement of lead content in line with ISO 11885.

Assessment level Category 2

D.3.3 PROCEDURE FOR NON-CONFORMING PRODUCTS

Recycler has a procedure in place in case of non-conforming *Recycled Output* related to the measurement of lead content. Measures are clearly identified and implemented internally. Records are kept.

Assessment level Category 2

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