

RecyClass



RECYCLABILITY & RECYCLED PLASTIC

USE OF CLAIMS GUIDANCE

TABLE OF CONTENTS

1	Introduction.....	7
2	Guiding principles for the use of RecyClass claims.....	10
3	RecyClass Recyclability and Recycled Plastic Assessments	12
4	RecyClass Recyclability Claims	16
4.1	Claims based on a Technology Approval	19
4.1.1	Business-to-business Claims	19
4.1.2	Business-to-consumer Claims	19
4.2	Claims based on a Letter of Compatibility.....	20
4.2.1	Business-to-business Claims	21
4.2.2	Business-to-consumer Claims	21
4.3	Claims based on Designed-for-Recycling Certification.....	22
4.3.1	Business-to-business Claims	23
4.3.2	Business-to-consumer Claims	23
4.4	Claims based on Recyclability Certification	24
4.4.1	Business-to-business Claims.....	25
4.4.2	Business-to-consumers claims.....	25
5	RecyClass Recycled Plastic Claims	26
5.1	Claims based on Recycling Process Certification	28
5.1.1	Business-to-business Claims.....	29
5.1.2	Business-to-consumers claims.....	29
5.2	Claims based on Recycled Plastics Traceability Certification	30
5.1.1	Business-to-business Claims.....	32
5.1.2	Business-to-consumers claims.....	33
6	Glossary.....	34
	Annex I: Technology Approval Letter	40
	Annex II: Letter of Compatibility (Design for Recycling)	41
	Annex III: Design for Recycling Certificate	42
	Annex IV: Recyclability Certificate.....	43
	Annex V: Recycling Process Certificate	44
	Annex VI: Recycled Plastics Traceability CertificateTraceability Certificate	45
	Annex VII: List of Recyclability Claims or Equivalent Messages.....	46
	Annex VIII: List of Recycled Plastics Claims or Equivalent Messages	47
	Annex IX: References	48

INTRODUCTION

Chapter 01

RecyClass

INTRODUCTION

Environmental claims have taken the world by storm, as companies transition from linear towards a circular economy and as the consumers look for products with a lower impact on the environment. The overall presence of green claims in non-food packaging exceeds 75%, with at least 32% of those claims referring to recyclability using the Mobius Loop logo¹.

Moreover, 59% of consumers perceive these green claims as unclear². In line with this, it should be noted that the use of the Mobius Loop logo indicates that packaging is eligible for national collection schemes and does not necessarily refer to recyclability.

Upcoming regulatory requirements at the EU level call for a transparent, structured, and consistent approach to recyclability and recycled content claims on the EU market. These include the revision of the essential requirements for recyclable packaging, the publication of the Green Deal which stipulates that all packaging must be recyclable by 2030, as well as mandatory requirements for recycled content in beverage bottles introduced by the Single-Use Plastics Directive³.

In line with these targets, RecyClass has established the foundation for a common methodology for recyclability⁴ and an approach for the calculation of recycled content⁵.

This Guidance lays out the principles for brand owners, converters, and other actors of the plastics value chain on how to use the claims granted via the different RecyClass Certification Schemes⁶ or Recyclability Approvals⁷, either for recyclability, recycling processes or recycled content.

Assessments are conducted by third-party Certification Bodies or Testing Facilities, which guarantees independent evaluation of the recyclability of a package and/or verification of recycled content in products based on traceability of recycled plastics.

Additional guidelines for communicating with consumers can be found in the RecyClass Best Practices for Recyclability and Recycled Content Claims document⁸.

The RecyClass Certification results may be voluntarily communicated to final consumers, stakeholders, or customers, via different channels. Both on-product and off-product claims are allowed depending on the conditions listed in the sections below.

This Guidance was developed in line with the ISEAL Sustainability Claims Good Practice Guide⁹ which aids for scheme owners in the development of systems for communicating on claims and certification marks related to their audit system.

GUIDING PRINCIPLES FOR THE USE OF RECYCLASS CLAIMS

Chapter 02

GUIDING PRINCIPLES FOR THE USE OF RECYCLASS CLAIMS

Before focusing on specific claims, users must consider the following guiding principles aimed at procuring commercial practices which must be clear, honest, and straightforward. According to Regulation 2005/29/EC¹⁰, an indication of misleading claims would be:

- Claims containing untruthful or false information in some way which would deceive the average consumer, even if the information is factually correct.
- Claims leading the average consumer to make a decision that he would not have taken otherwise.
- Claims which omit material information that the average consumer needs according to the context.

Following these guiding principles, claims shall avoid general statements such as “environmentally friendly”, “sustainable” or “green product” which may be misleading for the consumers as they do not communicate clearly why those products are better for the environment.

For recycled plastic, claims must state the percentage of recycled content and avoid vague messages such as “contains recycled plastics” or “circular plastics”. Messages should be clear by using statements such as “bottle contains X% of recycled plastics, originating from post-consumer”.

More guidance on specific messages is described in Annex VII and VIII.

RECYCLASS RECYCLABILITY AND RECYCLED PLASTIC ASSESSMENTS

Chapter 03

RECYCLASS RECYCLABILITY AND RECYCLED PLASTIC ASSESSMENTS

RecyClass developed Recyclability Evaluation Protocols based on scientific testing methods to determine the compatibility of packaging with plastic recycling processes. The laboratory results are reported via Technology Approval Letters. In addition, RecyClass established three Audit Schemes for recyclability and recycled plastics: Recyclability Certifications for plastic packaging, Recycling Process Certification, and Recycled Plastics Traceability Certification for plastic products.

An overview of all the assessments established by RecyClass and their corresponding claims is presented in the following table. For more details and examples of claims, please refer to the subsequent sections and annexes.

	ASSESSMENT	LABORATORY TESTING	TYPE OF PRODUCT	CLAIMS	CERTIFICATION MARK USE	SECTION
TECHNOLOGY APPROVAL	Technology Approval	Yes	Semi-finished and finished plastic packaging	B2B	No	4.1
RECYCLABILITY CERTIFICATION SCHEMES	Letter of Compatibility	No	Semi-finished plastic packaging	B2B	No	4.2
	Design for Recycling Certificate	No	Finished plastic packaging	B2B	Yes; off-product	4.3
	Recyclability Certificate	No	Finished plastic packaging	B2B; B2C	Yes; on and off-product	4.4
RECYCLED PLASTIC CERTIFICATION SCHEMES	Recycling Process Certificate	No	Plastic pellets, flakes and agglomerates	B2B	Yes; off-product	5.1
	Recycled Plastics Traceability Certificate	No	Plastic materials, finished and/or semi-finished products	B2B; B2C	Yes; on and off-product	5.2

RECYCLASS RECYCLABILITY CLAIMS

Chapter 04

RECYCLASS RECYCLABILITY CLAIMS

The following section lays down principles on communicate the results obtained via Technology Approvals¹¹, Letter of Compatibility¹², Design for Recycling Certification¹³ and Recyclability Certification¹⁴.

The Letter of Compatibility, Design-for-Recycling Certification, and Recyclability Certification are assessments designed to verify the recyclability of a package based on the RecyClass Methodology¹⁵ and Design-for-Recycling Guidelines¹⁶. These assessments are carried out via recognised, independent third-party Certification Bodies. When a package contains an innovation which is not considered in the Guidelines, additional laboratory testing is required, following RecyClass Recyclability Evaluation Protocols¹⁷. In this case, results are assessed by the RecyClass Technical Committees that issues a Technology Approval Letter in case of a positive outcome.

Communication and claims available for the different Certifications or Approval Letters are described next.

4.1 CLAIMS BASED ON A TECHNOLOGY APPROVAL

A Technology Approval is the evaluation of the compatibility of a specific technology or feature of a package (e.g. a multilayer film; a combination of label and glue) with state of art recycling processes of a given waste stream. It can assess the recyclability of either semi-finished or finished packaging (a package including its final decoration).

The Technology Approval is granted by the RecyClass Technical Committees (TC) based on the results of independent laboratory testing in accordance with RecyClass Recyclability Protocol Evaluations.

The decision of the TC will determine if the technology has:

- **FULL COMPATIBILITY WITH A CERTAIN RECYCLING STREAM:** materials that passed the testing Protocols with no negative impact on a given recycling stream.
- **LIMITED COMPATIBILITY WITH A CERTAIN RECYCLING STREAM:** materials that passed the testing Protocols if certain conditions are met and pose a low risk of interfering with a given recycling stream.
- **NO COMPATIBILITY WITH RECYCLING:** materials that failed the testing Protocols, which therefore will present a high risk of interfering with a given recycling stream.

RecyClass issues an Approval Letter to the applicant which will detail the results of the assessment and the conditions of the Approval. An example of a letter can be found in Annex I.

Upon the approval of the applicant, RecyClass can publish a press release announcing the novel findings. The text must refer to the information reported in the Approval Letter and must avoid any marketing statements about the product.

The applicant may also communicate the findings as specified in the Approval Letter, more information can be found in the sections below.

RecyClass

NAME OF THE COMPANY
RECYCLASS TECHNOLOGY APPROVAL

Brussels, DD/MM/YYYY

The RecyClass **TC** Technical Committee was requested to carry out an assessment of **NAME OF THE TECHNOLOGY** by the **NAME OF COMPANY** to verify its impact on the quality of **RECYCLING STREAM**.

DESCRIPTION OF THE PRODUCT, RESULTS OF THE TEST, REFERENCE OF THE PROTOCOL USED:

Based on these results, RecyClass certifies that **NAME OF THE TECHNOLOGY** technology will not have a negative impact on the current European Recycling Stream.

LIST OF CONDITIONS LINKED TO THE APPROVAL:

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LIST OF CONDITIONS LINKED TO THE APPROVAL:

Any chance on the formulation of the technology must be communicated to the Technical Committee which will reassess the approval of the technology.

Annex I:
PICTURE OF THE TECHNOLOGY TESTED

About:
RecyClass is a comprehensive cross-industry initiative that seeks to advance plastic packaging recyclability and to establish a harmonised approach towards recycled content calculation and transparency to design. In close collaboration with RecyClass, the development of Recyclability Evaluation Protocols and guidelines, setting minimum standards, which serves as the basis for the design of recycling guidelines and the final waste label. RecyClass offers Recyclability Certification and Recycled Content Recyclability Certification for plastic packaging.

Contact: info@recyclability.com or www.recyclability.com

4.1.1 Business-to-business Claims

The applicant can communicate to customers, stakeholders, public procurement, and suppliers the results of the Approval Letter via website, press release, social media and direct communications.

The used wording must correspond to the Approval Letter, all the conditions listed and RecyClass must be mentioned. Partial reporting of the conditions is forbidden. The applicant may also link the communication to the Approval Letter, which is published on the RecyClass website.

4.1.2 Business-to-consumer Claims

An Approval Letter signals full or limited compatibility with a certain recycling stream. However, it does not constitute a Certification of a final product, therefore it must not be communicated to the consumer.

Under this category, the applicant cannot showcase a RecyClass Certification Mark or a claim of recyclability in the final package.

4.2 CLAIMS BASED ON A LETTER OF COMPATIBILITY

The Letter of Compatibility provides an intermediate evaluation of the recyclability of a semi-finished packaging. A semi-finished packaging is the packaging’s body or one of its main components (e.g. dispenser, closure systems, etc.) without all its final elements (e.g. barrier, labels, artwork, etc.). Therefore, the evaluation must not be considered as a final recyclability result.

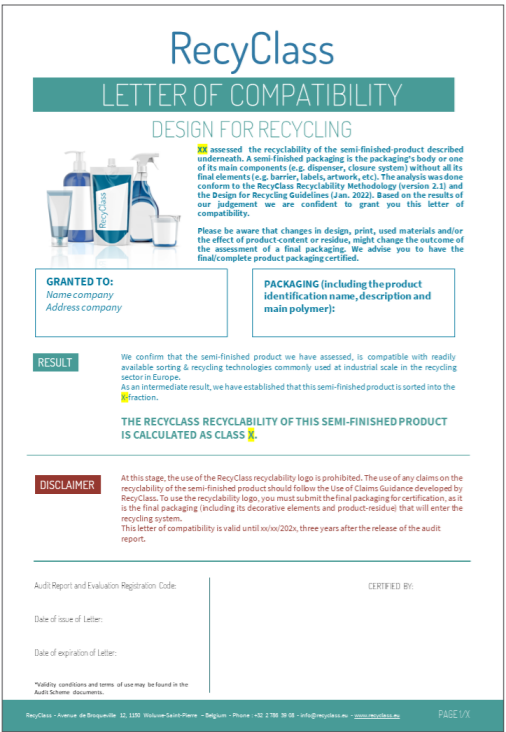
The evaluation is based on the RecyClass Methodology and its associated self-assessment RecyClass Online Tool¹⁸.

It is conducted by an independent, recognised Certification Body¹⁹ which issues an Audit Report and a Letter of Compatibility stating the class result received by the semi-finished packaging. An example of this Certificate may be found in Annex II.

The Letter of Compatibility displays a class result grading the semi-finished packaging from class A to F which relate to, respectively, fully or non- recyclable.

This grading system provides for simplified communication while conveying the message that recyclability is non-binary.

At this stage, the use of the RecyClass recyclability Certification Mark is prohibited since changes in design, printing, used materials, and the effect of product content or residue might change the outcome of the assessment of a final packaging. Claims are allowed as described in the sections below.



4.2.1 Business-to-business Claims

The company may use the Letter of Compatibility and claims in communication such as website, press releases, social media channels and direct communication aimed at stakeholders, customers, public procurement, or suppliers in relation to certified products. Ambiguous use of the Certification Mark is not allowed.

The company must always specify that the assessment constitutes a pre-evaluation of recyclability, and that any changes in design, print, used materials, and the effect of product content or residue, might change the outcome of the recyclability of a final packaging. Claims must also specify that the Letter of Compatibility class result offers scoring on recyclability in Europe which does not consider the specific collection systems in the different countries. These claims should be paired with a link to the Letter of Compatibility (e.g. letter code²⁰) and a reference to RecyClass.

The applicant may include a list of additional features that will be added to the packaging, depending on its final use, and that may vary the recyclability class. In order to claim that the semi-finished packaging is designed to be recycled, the interim result should be between classes A and C. A list of examples of adequate messages may be found in Annex VII.

4.2.2 Business-to-consumer Claims

The Letter of Compatibility provides only an intermediate evaluation of the recyclability of a packaging. Therefore, under this category, the applicant cannot showcase a RecyClass Certification Mark or a claim of recyclability on the final packaging towards the consumer. The letter does not constitute a Certification of a final product.

The company may use the Letter of Compatibility and corresponding claims in communication such as website, press releases and social media channels, specifying that the letter provides an interim evaluation of the recyclability, and that any changes in design, print, used materials and/or the effect of product-content or residue, might change the outcome of the assessment of a final packaging. Ambiguous use of the Certification Mark is not allowed.

The applicant may include a list of additional features that will be added to the packaging, depending on its final use, and that may vary the recyclability class. In order to claim that the semi-finished packaging is designed to be recycled, the interim result should be between classes A and C. A list of examples of adequate messages may be found in Annex VII.

4.3
RECYCLASS CLAIMS BASED ON A DESIGN-FOR-RECYCLING CERTIFICATION

The Design-for-Recycling Certification is an evaluation of the recyclability of a finished packaging based on the RecyClass Methodology; the pre-evaluation of the recyclability assessment is also available via the Online Tool.

The Certification evaluates the recyclability of a packaging based on the technical feasibility of it being properly sorted and recycled in Europe. The Certification considers the most commonly used technologies of the European waste management infrastructures, without taking into consideration local or country specificities.



The assessment is conducted by an independent, recognised Certification Body²¹ which issues an Audit Report and a Certificate stating the class result received by the packaging. The Certificate displays a class result grading the packaging from a class A to C which relate to, respectively, full to limited recyclability. An example of this Certificate may be found in Annex III.

Certification holders who obtained a grading between A – C can claim their packaging and equivalent packaging are designed for recycling. Certification results below C are not considered recyclable. In this case, no additional contradicting messages claiming the packaging to be designed for recycling can be used since its design presents fundamental flaws that will affect the quality of the output material. Therefore, to avoid greenwashing, recyclability claims are not allowed in these cases.

Certification holder may claim that their packaging is designed-for-recycling and may use the Certificate and claims following the guidance laid out in the next sections.

Additional information regarding the disposal of a packaging is out of the scope of the Certification and it is specific for each Member State where EPR schemes or other organisations procure guidelines to consumers.

4.3.1 Business-to-business Claims

Certification holder may use the Certificate, Certification Mark, and claims in communication such as website, press releases, social media channels and direct communication aimed at stakeholders, customers, public procurement, or suppliers relation to certified products. Ambiguous use of the Certification Mark is not allowed.

Certification holder can also reference to the Certificate in their documentation delivery notes or product specification sheets corresponding to the certified packaging. These claims must be paired with a link to the Design-for-Recycling Certificate (e.g. certificate code²²) and a reference to RecyClass.

Claims must specify that the Design-for-Recycling Certification class result offers scoring on recyclability in Europe which does not consider the specific collection systems in the different countries.

A disclaimer that indicates that the recyclability of a packaging is subject to the national collection systems which might vary locally must be clearly stated. The applicant may include a list of countries where the packaging is collected (or exclude certain countries where this is not the case) following the information provided by RecyClass. Certified packaging must achieve an assessment result between A and C in order to communicate that the packaging is designed to be recycled. A list of examples of adequate messages may be found in Annex VII.

RecyClass Design for Recycling Certification applies to final products. *Semi-finished products* can obtain a *Letter of Compatibility*. See Letter of Compliance in Annex III. The results of the letter of compatibility can be communicated business to business. However, at this stage, the use of the RecyClass logo is prohibited.

4.3.2 Business-to-consumer Claims

Certification holder may not use the Design for Recycling Certificate and corresponding claims on-product aimed towards the final consumers.

The Design for Recycling Certificate assesses the compatibility of a certain packaging with sorting and recycling practices, but it does not take into consideration the collection. Therefore, under this category, the applicant cannot showcase a RecyClass Certification Mark or a claim of recyclability in the final packaging towards the consumer.

Certification holder may use the Design for Recycling Certificate, Certification Mark, and corresponding claims in communication such as website, press releases, social media channels and direct communication aimed towards the final consumers only when referring to certified products. Ambiguous use of the Certification Mark is not allowed.

Claims must specify that the Design-for-Recycling Certification class result offers scoring on recyclability in Europe which does not consider the specific collection systems in the different countries. A disclaimer that indicates that the recyclability of a packaging is subject to the national collection systems which might vary locally must be clearly stated. The applicant may include a list of countries where the packaging is collected (or exclude certain countries where this is not the case) following the information provided by RecyClass.

Certified packagings must achieve an assessment result between A and C in order to communicate that the packaging is designed to be recycled. A list of examples of adequate messages may be found in Annex VII.

4.4

RECYCLASS CLAIMS BASED ON A RECYCLABILITY CERTIFICATION

The Recyclability Certification is a country-specific quantitative evaluation of the recyclability of a packaging according to the RecyClass Recyclability Methodology.

Recyclability Certification is assessed considering the collection schemes, as well as the effective availability of sorting and recycling infrastructures in the audited area.

The Certification Body²³ will issue an Audit Report and Certificate following the assessment. The specific percentage results in a more technical approach to the package's recyclability while the Certification is aimed at the final consumer as well. The Certificate is linked

to a country or group of countries depending on the geographical scope of the performed assessment. An example of the Certificate may be found in Annex IV.

More information on the differences between a Design-for-Recycling and Recyclability Certification is available in the RecyClass Recyclability Methodology.

Certification holder may claim recyclability for their packaging and may use the Certification Mark found in Figure 2 for communication purposes in line with the guidance laid out in the following sections.

Figure 2. Recyclability Certification Mark - Example Class A, B, C



Certification holders who obtained a class between A and C, can claim plastic packaging recyclability of the certified or equivalent packaging. Certification results below C are considered non-recyclable. No additional contradicting messages regarding the recyclability of the package can be used since its design presents fundamental flaws which will affect the quality of the output material. Therefore, to avoid greenwashing, recyclability claims are NOT allowed in these cases. Examples of claims may be found in Annex VII may also be used to communicate the packaging recyclability.

Additional information regarding the disposal of a package is out of the scope of the Certification as it is specific to each Member State where EPR schemes procure guidelines to consumers.

Information on how to communicate about the Certification results, depending on the audience, is provided in the sections below.

4.4.1 Business-to-business Claims

Certification holder may use the Certificate or the corresponding Certification Mark in communication such as website, press release, social media channels and direct communication aimed at stakeholders, EPR schemes, customers or suppliers when referring to certified products. Ambiguous use of the Certification Mark is not allowed.

Certification holder can also use the Certification Mark in documentation delivery notes or product specification sheets corresponding to the certified packaging. These claims must be paired with a link to the Recyclability Certificate (e.g. certificate code) and a reference to RecyClass.

Business-to-business communication must refer to the recyclability percentage which is easily understood within the industry and show an accurate result of the assessment. Claims must be in line with the information stated in the Certificate. Information about the specific geographical area linked to the Certificate must be considered.

When the package is not final²⁴, the Certification holder must avoid using the Certification Mark with the class on-product. On-product use of the Certification Mark always refers to the final packaging.

4.4.2 Business-to-consumers claims

Certification holder may use the Certificate or the corresponding Certification Mark in communication such as website, press releases, social media channels and direct communication (ads, banners, etc.) aimed at consumers when referring to certified products. Ambiguous use of the Certification Mark is not allowed. Claims and Certification Mark may also be used on-product which allows the consumer to make an informed purchase based on the packaging's recyclability class.

Claims and Certification Mark must refer to the class result only, which provides a simple indication of the packaging recyclability to avoid creating confusion with a recycled content percentage in the product. Claims can refer to plastic packaging recyclability when the attributed class is A, B or C. A list of examples of adequate messages may be found in Annex VII.

The Recyclability Certification is linked to a specific geographical area. The use of claims and Certification Mark should be limited to the countries mentioned in the Certificate or must be clearly mentioned in the information accompanying the Certification Mark (mention it is applicable to country x, y).

The document "RecyClass Certification Mark Design Guidance²⁵" offers additional information on how to properly display the Certification Mark in terms of graphic design, allowing flexibility to marketers to choose an option which is better suited to their branding.

RECYCLASS RECYCLED PLASTIC CLAIMS

Chapter 05

RECYCLASS RECYCLED PLASTIC CLAIMS

5.1 CLAIMS BASED ON A RECYCLING PROCESS CERTIFICATION

The RecyClass Recycling Process Certification is issued to waste management processes recycling waste into products. The Certification ensures transparent, traceable origin of the waste as defined in EN 15343:2007²⁶ and its recycling into a new raw material following a segregation or controlled blending, chain of custody model as per definitions included in ISO 22095:2020²⁷.

The Certification is issued via a third-party Certification Body for a recycling process or processes within a site linked to a list of products with a share of recycled plastic. The Recycling Process Certification can be used as proof of origin certificate for the Recycled Plastics Traceability Certification. An example of the certificate can be found in Annex V.

Certification holder may use the accompanying Certification Mark and claims of traceability of recycled plastics found in Figure 3 for communication purposes in line with the guidance described in the sections below.



The image shows a template for a RecyClass Recycling Process Certificate. It features a green header with the RecyClass logo and a yellow box with the text 'RECYCLING PROCESS CERTIFICATE'. The main body is white with green text. It includes fields for the recycler's name, address, country, and registration office address. It also includes a section for 'Certification compliant with EN 15343:2007' with checkboxes for various modules (A1, A2, B, C, D) and a section for 'Process overview' with fields for input plastic waste, type and source of waste, recycled output, and pre-processed waste outputs. The bottom section includes 'CERTIFIED BY' with a box for the CB logo, 'Name of CB representative', 'Lead auditor', 'Certification Body name', and 'Address'. It also includes a footer with contact information and a page number 'PAGE 1/4'.

Figure 3. Recycling Process Certification Mark



5.1.1 Business-to-business Claims

The RecyClass Recycling Process Certification Mark can be used in websites, presentations, signatures, etc. When using the Certification Mark for instance in product specifications, it can only be done for those products listed in the certificate.

Certification holders may use the Certificate and Certification Mark to communicate that a site has been awarded the certification for the recycling of plastics. Certification offers third party verification of the origin of the waste and traceability of recycled plastics to customers, as well as ensuring appropriate treatment of the waste into new raw materials to suppliers.

Certification holders may specify the compliance with add-on modules, if present, in the Audit Scheme: Module A. Food Contact (A1 and A2), Module B. Cosmetics and Household care applications, and Module C. Corporate Social Responsibility. In case of compliance with Module A, Certification holders may claim that they have the corresponding procedures in place to demonstrate compliance with the requirements of Regulation (EC) 2022/1616²⁸ in case of a technology listed in Annex I (of the Regulation). Please note that Certification does not constitute proof of food contact approval.

The use of the Certification Mark is mainly reserved for off-product communication. However, the use of the Certification Mark on big bags is allowed when the recycled material is listed as a certified product in the Certificate.

5.1.2 Business-to-consumer Claims

The Certification is aimed at business-to-business communication; therefore no claims towards the consumers can be used. no claims towards the consumers can be used.

5.2
CLAIMS BASED ON A RECYCLED PLASTICS TRACEABILITY CERTIFICATION

RecyClass Recycled Plastics Traceability Certification allows certification holders to claim the use of recycled plastics in a product, component or compound to suppliers, customers, stakeholders or consumers.

The Certification verifies that traceability of the use of recycled plastics in products is in place within the whole value chain process. The Certification Scheme was developed according to ISO 22095 and EN 15343 on traceability, conformity assessment and calculation of recycled content.

The Certification is granted via independent Certification Bodies. Following an on-site audit, an Audit Report, Summary Sheet and Certificate will be issued, detailing the successful certification of the process linked to a list of certified products which contain recycled plastics.

An example of the Certificate may be found in Annex VI. The Certificate includes a list of products or components with recycled content, specifying if it refers to pre- or post-consumer material.

Claims of recycled content are possible according to the messages found in Annex VIII which can be paired with their corresponding Certification Mark included in Figure 4.



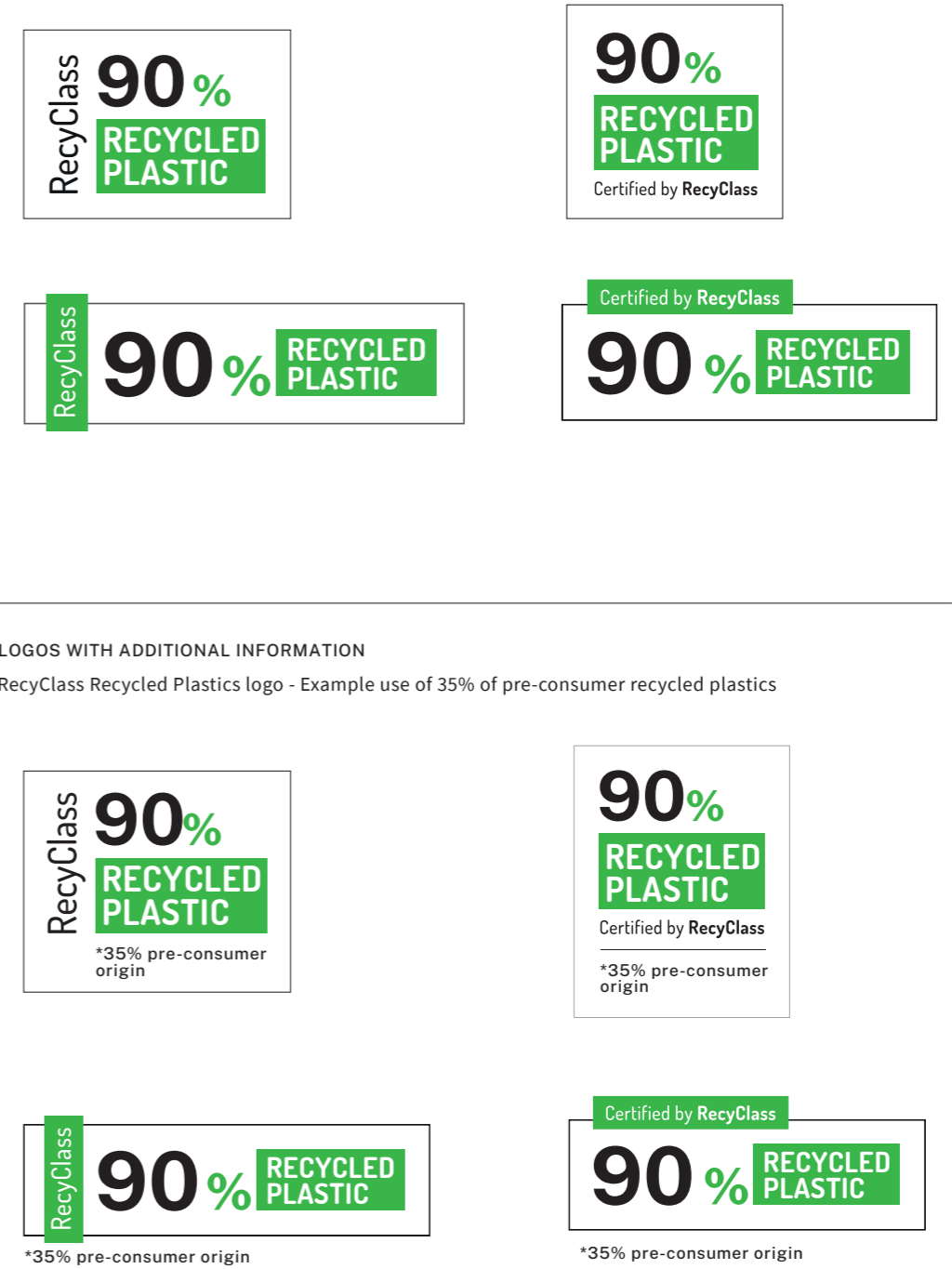
Claims and Certification Mark for certified products, compounds or components can only be used with a recycled content percentage equal to or higher than 10%.

Certification Marks including clarifying notes may display these in languages other than English.

Claims and Certification Mark must reflect the percentage recycled content as per the Certificate when communicating with the industry. When communicating to the consumer, please see section 4.3.2.

Requirements on the use of the claims and Certification Mark are further detailed in the sections below.

Figure 4. Recycled Plastics Traceability logo - Example 90% recycled plastics



LOGOS WITH ADDITIONAL INFORMATION

RecyClass Recycled Plastics logo - Example use of 35% of pre-consumer recycled plastics

5.2.1 Business-to-business Claims

Certification holders may use the Certificate itself or the recycled content percentage for certified products or components along the value chain in communication such as website, press releases, social media channels and direct communication with stakeholders, customers and suppliers in relation to certified products. Ambiguous use of the Certification Mark is not allowed. Certification holder can also use the claim or logo in their documentation, delivery notes, product boxes or product specification sheets corresponding to certified products. The logo must use the percentage as stated in the Certificate and it should clarify the origin of the material accurately. These claims must be paired with a link to the Recycled Content Traceability Certification (e.g. certificate code) and a reference to RecyClass.

Additionally, RecyClass highly recommends sharing the Certificate where relevant information regarding the certified products may be found. In those claims

that the Certificate is not shared, a reference to the Certificate and RecyClass must be procured.

Claims of recycled content traceability according to the Certification within the value chain can be:

- **Generic claims recognising a site Certification** where a third-party auditor verified the ability of the site to trace the recycled content used in an array of a product portfolio.
- **Specific claims concerning the recycled content of a product or component** which was included in the list of certified products in the Audit Report and Certificate. Claims of recycled content in products and components throughout the value chain must be precise to the result of the Audit specifying the origin of the waste and percentage of recycled content (e.g. transparent film with 50% recycled plastics from pre-consumer waste.).

5.2.2 Business-to-consumer Claims

Certification holders may use claims of recycled content towards consumers via the website, press releases, social media communication or direct communication (banners, ads, etc.), as well as displaying of the Certification Mark both on and off product. Claims to consumers must refer to RecyClass Certification of Recycled Plastics Traceability. Use of the Certification Mark must be linked to certified products. Ambiguous use of the Certification Mark is not allowed.

Off-product claims must be linked to a specific product or component certified when communicating towards the consumer. The information needs to be aligned with the data provided during the audit process which is reported in the Certificate and Audit Report. When claims refer to a component, this must be clarified. All claims of recycled content must be linked to a Certificate code which can be identified and linked to an Audit Report. In addition to the percentage, the applicant can choose to add additional messages regarding the recycled content of a specific product. A list of examples of accepted claims can be found in Annex VIII.

Claims and Certification Marks can be used on and off product when the component represents at least 50% of the total weight of the plastic parts of the certified product. In this case, it must be clarified that the claim refers to a specific component and not the overall product. In case of component claims for products with plastics and other materials asin different components, a clarification should be added as well.

When calculating the recycled content of a final product with several plastic components, results must be rounded down to an integer value.

As an example, for packaging, the calculation of recycled plastic for the whole product considers the

overall weight of the plastic components whereas non-plastics are excluded (e.g. paper, metal, etc.).

- Example: a plastic bottle weighing 100g (75 g main plastic body, 5g plastic sleeve, 20g plastic cap). The main body of the bottle has 98% post-consumer recycled content, the other 2% are additives. Plastic sleeve and cap do not contain recycled content. The recycled content of the product taking into account the total weight will be 73.5%. The value can be rounded down to 73% or 70%. This is the value that must be communicated to the final consumer and included in the Certification Mark. The origin of the material can also be communicated as “post-consumer” or “originated from post-use”.

Alternatively, the certification holder can communicate the recycled content per component.

- Following the previous example, the certification holder could also communicate “bottle contains 98% of recycled plastics from post-consumer origin – excluding cap and label”.

In addition to the percentage of recycled content, claims and Certification Mark include the indication of the origin of the waste when the origin is pre-consumer. When the origin of the waste is post-consumer, the applicant can choose to disclose the origin.

The document “RecyClass Certification Mark Design Guidance” offers additional information on how to properly display the Certification Mark in terms of graphic design, allowing flexibility to marketers to choose an option which is better suited to their branding. RecyClass proposes several versions of the Certification Mark in different sizes to fit all types of products.

GLOSSARY

Chapter 06

GLOSSARY

CERTIFICATION HOLDER: Company that successfully passed the audit for one of the RecyClass Certification Schemes.

CONSUMERS: General public.

DESIGN-FOR-RECYCLING ASSESSMENT: This Assessment evaluates and ranks the recyclability of plastic packaging, determining to which extent it is suitable for a specific recycling stream based on the state-of-the-art sorting and recycling technologies available in Europe. This assessment does not consider the collection, sorting and recycling specificities in a given country. The Assessment is based on RecyClass Design for Recycling Guidelines and its associated self-assessment Onlint Tool, which allows classifying the technical recyclability of plastic packaging on the European market.

LETTER OF COMPATIBILITY: Letter reporting the results of the Design for Recycling Compatibility Evaluation for semi-finished packaging. The letter issued by the Certification Body results in an intermediate class ranking following the audit scheme of the Design for Recycling Assessment.

SEMI-FINISHED PACKAGING: Packaging's body or main component without all its final elements (e.g. labels, artwork, etc.).

PRE-CONSUMER²⁹: Material diverted from the waste stream during the manufacturing process. Excluded is reutilization of materials such as rework, regrind or scrap generated in a process and capable of being reclaimed within the same process that generated it.

POST-CONSUMER³⁰: Material generated by households or by commercial, industrial and institutional facilities in their role as end-users of the product which can no longer be used for its intended purpose. This includes returns of material from the distribution chain.

RECYCLABILITY: Plastics must meet four conditions for a product to be considered recyclable:

1. The product must be made with plastic that is collected for recycling, has market value and/or is supported by a legislatively mandated program.
2. The product must be sorted and aggregated into defined streams for recycling processes.
3. The product can be processed and reclaimed/recycled with commercial recycling processes.
4. Recycled plastic becomes a raw material that is used in the production of new products.

This definition does not intend to restrict innovation. For innovative materials to be recyclable, it shall be demonstrated that they can be collected and sorted in sufficient quantities and are compatible with existing industrial recycling processes or have sufficient material quantities to justify operating new recycling processes. Nonetheless, fulfilling these four categories does not automatically designate a product recyclable.

RECYCLABILITY ASSESSMENT: The package is designed to be recycled, following the RecyClass Design for Recycling Guidelines, and is effectively recycled in the specific geographical area for which the assessment is conducted. In this assessment, the existence of selective collection schemes, as well as the existence of sorting and recycling infrastructures are checked.

ANNEX

ANNEX I. APPROVAL LETTER

RecyClass

NAME OF THE COMPANY
RECYCLASS TECHNOLOGY APPROVAL

Brussels, DD/MM/YYYY

The RecyClass XXX Technical Committee was requested to carry out an assesement of name of the technology by the NAME OF COMPANY to verify its impact on the quality of RECYCLING STREAM.

DESCRIPTION OF THE PRODUCT, RESULTS OF THE TEST, REFERENCE OF THE PROTOCOL USED.

Based on these results, RecyClass certifies that NAME OF THE TECHNOLOGY technology will not have a negative impact on the current European Recycling Stream

LIST OF CONDITIONS LINKED TO THE APPROVAL

LIST OF CONDITIONS LINKED TO THE APPROVAL

LIST OF CONDITIONS LINKED TO THE APPROVAL

Any chance on the formulation of the technology must be communicated to the Technical Committee which will reassess the approval of the technology.

Annex 1.
PICTURE OF THE TECHNOLOGY TESTED

About.

RecyClass is a comprehensive cross-industry initiative that works to advance plastic packaging recyclability and to establish a harmonized approach towards recycled content calculation and its traceability in Europe. Activities within RecyClass include the development of Recyclability Evaluation Protocols and scientific testing of innovative materials which serve as the base for the Design for Recycling guidelines and the free online tool. RecyClass offers Recyclability Certifications and Recycled Content Traceability Certification for plastic packaging.

Contact: Alice.Vallan@plasticsrecyclers.eu www.plasticsrecyclers.eu


c/o Plastics Recyclers Europe
Avenue de Broqueville 12
1150 Brussels, Belgium

Phone: + 32 2 315 24 60
info@recyclclass.eu
www.recyclclass.eu

ANNEX II. LETTER OF COMPATIBILITY (DESIGN FOR RECYCLING)

RecyClass

LETTER OF COMPATIBILITY
DESIGN FOR RECYCLING



XX assessed the recyclability of the semi-finished-product described underneath. The analysis was done conform the RecyClass guidelines and methodology. Based on the results of our judgement we are confident to grant you this letter of compatibility.

Please be aware that changes in design, print, used materials and/or the effect of product-content or residue, might change the outcome of the assessment of a final packaging. We advise you to have the final/complete product packaging certified.

GRANTED TO:
Name company
Address company

PACKAGING:
Product type, name etc.

RESULT

We confirm that the semi-finished product we have assessed, is compatible with readily available sorting & recycling technologies commonly used at industrial scale in the recycling sector in Europe.
As an intermediate result, we have established that this semi-finished product is sorted into the Xfraction.

THE RECYCLASS RECYCLABILITY OF THIS SEMI-FINISHED PRODUCT IS CALCULATED AS CLASS X.

DISCLAIMER

At this stage, the use of the RecyClass logo is prohibited. The use of any claims on the recyclability of the semi-finished product are not supported by RecyClass. To use the logo and/or to have RecyClass endorsement, you must submit the final packaging for certification. Indeed, it is the final packaging (including its decorative elements and product-residue) that will enter the recycling system.
This letter of compatibility is valid until xx/xx/202x, three years after the release of the audit report.

Audit Report and Certificate Registration Code N°:

CERTIFIED BY :

Date of issue of certificate :

Valid until :

*Validity conditions and terms of use may be found in the Audit Scheme documents.

RecyClass - Avenue de Broqueville 12, 1150 Woluwe-Saint-Pierre - Belgium - Phone : +32 2 315 24 60 - info@recyclclass.eu - www.recyclclass.eu

PAGE 1/2

PAGE 41

ANNEX III. DESIGN FOR RECYCLING CERTIFICATE

RecyClass

DESIGN-FOR-RECYCLING CERTIFICATE

THIS CERTIFIES THAT

PRODUCT NAME

PACKAGING DESCRIPTION AND MAIN POLYMER

BRAND NAME

The product and equivalent products listed in Annex I were assessed and certified according to RecyClass Recyclability Methodology (version 3.0) and Design for Recycling Guidelines (Jan. 2025), hereby obtaining the following recyclability class:

XX%

RECYCLABLE PLASTIC CONTENT

The value represents the proportion of plastic in the packaging that is recoverable and valuable for the recycling stream.



Audit Report and Certificate Registration Code:

CERTIFIED BY:

Date of issue of Certificate:

Date of expiration of Certificate:

*Validity conditions and terms of use may be found in the Audit Scheme documents.

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ANNEX IV. RECYCLABILITY CERTIFICATE

RecyClass

RECYCLABILITY CERTIFICATE

THIS CERTIFIES THAT

PRODUCT NAME

PACKAGING DESCRIPTION AND MAIN POLYMER

BRAND NAME

The product and equivalent products listed in Annex I were assessed and certified according to RecyClass Recyclability Methodology (version 3.0) and Design for Recycling Guidelines (Jan. 2025), hereby obtaining the following recyclability class:

XX%

RECYCLABLE PLASTIC CONTENT

The value represents the proportion of plastic in the packaging that is recoverable and valuable for the recycling stream.



The certificate and its result are valid for:

Audit Report and Certificate Registration Code:

CERTIFIED BY:

Date of issue of Certificate:

Date of expiration of Certificate:

*Validity conditions and terms of use may be found in the Audit Scheme documents.

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ANNEX V. RECYCLING PROCESS CERTIFICATE

ANNEX VI. RECYCLED PLASTICS TRACEABILITY CERTIFICATE

RecyClass

RECYCLING PROCESS
CERTIFICATE

Name of the recycler: Name of the recycler

Address: Address

Country: Country

Registration office address: Address

Country: Country

The audited recycling process and associated management systems have met the requirements of Recycling Process Audit Scheme Version 1.X, in line with EN 15343:2007 and has the required procedures in place in order to ensure the traceability of recycled plastics produced listed in the annex of this certificate.

Certification compliant with EN 15343:2007.

Certification Module:

☐ General requirements – Level 1

☐ General requirements – Level 2

☐ A1: Food Contact**

☐ A2: Food Contact **

☐ B: Cosmetics & Household Applications

☐ C: Corporate Social Responsibility

☐ D: PVC Requirements

Type of audit: e.g. monitoring

Initial certificate issue date: XX/XX/XXXX

Chain of custody model: e.g., controlled blending

Traceability level: 1, 2 or 3

Process overview: e.g., sorting, washing, extrusion

Input Plastic waste: e.g., PET bales

Type and source of waste: e.g., post-consumer, household - bottles

Recycled Output: e.g., PET flakes

Pre-processed waste outputs: No

Audit Report and Certificate Code:
RP001-XXX-07-23-XXX-XX

Date of the on-site audit:
XX/XX/2022

Date of issue of certificate:
XX/XX/2022, (extension xx/xx/xxxx)

Period of validity*:
XX/XX/2022 – XX/XX/2023
(extended to xx/xx/xxxx)

*Validity conditions and terms of use may be found in the Audit Scheme documents.

**RecyClass Module A does not constitute proof of food contact approval or guarantees full compliance with Regulation (EU) NR 2022/1816.

CERTIFIED BY:

CB logo

NAB logo

Name of CB representative

Lead auditor

Certification Body name

Address

Certification Body is accredited by

Name of AB under the certificate nr. XX

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Certificate of Compliance Version 1.2

PAGE 1/X

RecyClass

RECYCLED CONTENT
TRACEABILITY CERTIFICATE

THIS CERTIFIES THAT

BRAND NAME

LEGAL COMPANY NAME AND ADRESS

Has been assessed in accordance with the Audit Scheme 1.0 (October 2020) and has the required procedures in place in order to ensure the traceability of recycled plastics incorporated in products listed in the attached Annex.

Type of process or operation audited: compounding, converting, trading, storage, filling, etc.

Audit Report and Certificate Registration Code:
XXX-XXX-000

Date of issue of certificate:
05/2021

Valid until:
05/2021

*Validity conditions and terms of use may be found in the Audit Scheme documents and the Certification Agreement.

CERTIFIED BY:

NAME OF AUDITOR

Title of the auditor

CERTIFICATION NAME

Certification adress

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PAGE 1/X

ANNEX VII. LIST OF RECYCLABILITY CLAIMS OR EQUIVALENT MESSAGES

THE FOLLOWING LIST OF MESSAGES MAY BE USED WHEN COMMUNICATING THE INTER-IM RESULTS OF THE LETTER OF COMPATIBILITY, WHEN THE RESULTS OBTAINED ARE CLASS A, B OR C. PLEASE KEEP IN MIND THAT THESE MESSAGES CANNOT BE USED DIRECTLY ON-PRODUCT.

PROPOSED MESSAGES

1. ACCORDING TO THE INTERMEDIATE RESULT, THE SEMI-FINISHED PRODUCT CAN BE SORTED INTO THE (E.G. PET) X- FRACTION.
2. SEMI-FINISHED (PLASTIC) PACKAGING COMPATIBLE WITH RECYCLING STREAMS AVAILABLE IN EUROPE.

THE FOLLOWING LIST OF MESSAGES MAY BE USED WHEN COMMUNICATING THE RESULTS OF THE DESIGN FOR RECYCLING CERTIFICATE WHEN THE RESULTS OBTAINED ARE CLASS A, B OR C. PLEASE KEEP IN MIND THAT THESE MESSAGES CANNOT BE USED DIRECTLY ON-PRODUCT.

PROPOSED MESSAGES

1. (PLASTIC PACKAGE) DESIGNED TO BE RECYCLED – CHECK LOCAL COLLECTION SYSTEMS
2. RECYCLING-READY PLASTIC PACKAGING – CHECK LOCAL COLLECTION SYSTEMS
3. (PLASTIC PACKAGING) COMPATIBLE WITH RECYCLING STREAMS AVAILABLE IN EUROPE

THE FOLLOWING MESSAGES CAN BE USED FOR RECYCLABILITY CERTIFICATIONS WHICH ARE LINKED TO A SPECIFIC LOCATION WITH CLASSES A, B OR C:

PROPOSED MESSAGES

1. RECYCLABLE
2. RECYCLABLE PLASTIC PACKAGING
3. THIS PLASTIC PACKAGING IS RECYCLABLE IN BELGIUM/BE

IN ORDER TO ADD ADDITIONAL MESSAGES TO THESE LISTS, PLEASE GET IN TOUCH WITH RECYCLASS TO REVIEW THE DOCUMENT WITHIN THE RECYCLING CLAIMS TASKFORCE³¹.

ANNEX VIII. LIST OF RECYCLED PLASTIC CLAIMS OR EQUIVALENT MESSAGES

THE FOLLOWING LIST OF MESSAGES MAY BE USED TO COMMUNICATE THE RESULTS OF THE RECYCLING PROCESS CERTIFICATION.

PROPOSED MESSAGES

1. TRACEABILITY OF THE RECYCLING PROCESSES CERTIFIED BY RECYCLASS.
2. THE RECYCLING PROCESS TRACEABILITY IS CERTIFIED ACCORDING TO EN 15343:2007.

THE FOLLOWING LIST OF MESSAGES MAY BE USED TO COMMUNICATE THE RESULTS OF THE RECYCLED PLASTICS TRACEABILITY CERTIFICATION.

PROPOSED MESSAGES

1. CONTAINS XX% RECYCLED PLASTICS
2. “PRODUCT” CONTAINS XX% RECYCLED PLASTICS, EXCLUDING “COMPONENT”
3. CONTAINS XX% RECYCLED PLASTICS CERTIFIED BY RECYCLASS
4. MADE OF XX% RECYCLED PLASTIC ORIGINATED FROM PRE-/POST-CONSUMER ORIGIN
5. XX% RECYCLED CONTENT / EXCLUDING “COMPONENT”

IN ORDER TO ADD ADDITIONAL MESSAGES TO THESE LISTS, PLEASE GET IN TOUCH WITH RECYCLASS TO REVIEW THE DOCUMENT WITHIN THE RECYCLING CLAIMS TASKFORCE.

ANNEX IX. REFERENCES

1. EC, 2014. Consumer Market Study on Environmental Claims for Non-Food Products available at https://ec.europa.eu/info/sites/info/files/study_on_environmental_claims_for_non_food_products_2014_en.pdf

2. EC, 2014. Consumer Market Study on Environmental Claims for Non-Food Products available on: https://ec.europa.eu/info/sites/info/files/study_on_environmental_claims_for_non_food_products_2014_en.pdf

3. OJ L 155, 12.6.2019, p. 1–19

4. RecyClass Recyclability Methodology available at <https://recyclclass.eu/recyclability/methodology/>

5. RecyClass Recycled Plastics Traceability Certification Audit Scheme available at <https://recyclclass.eu/get-certified/recycled-plastic/recyclclass-certification-documents/>

6. Information about RecyClass Certifications is available at <https://recyclclass.eu/get-certified/>

7. Information about Technology Approvals is available at <https://recyclclass.eu/recyclability/approvals/>

8. Best Practices for Recyclability and Recycled Content Plastic Claims. Consumers Communication Guidance available at <https://recyclclass.eu/get-certified/use-of-claims/>

9. ISEAL. Sustainability Claims Good Practice Guide available at https://www.isealalliance.org/sites/default/files/resource/2017-11/ISEAL_Claims_Good_Practice_Guide.pdf

10. OJ L 149, 11.6.2005, p. 22–39

11. RecyClass Technology Approvals are available at <https://recyclclass.eu/recyclability/approvals/>

12. Letter of Compatibility available at <https://recyclclass.eu/get-certified/recyclability/#1>

13. Design for Recycling Certification available at <https://recyclclass.eu/get-certified/recyclability/#1>

14. Recyclability Certification available at <https://recyclclass.eu/get-certified/recyclability/#1>

15. RecyClass Recyclability Methodology available at <https://recyclclass.eu/recyclability/methodology>

16. Design for Recycling Guidelines available at <https://recyclclass.eu/recyclability/design-for-recycling-guidelines/>

17. Recyclability Protocol Evaluations available at <https://recyclclass.eu/recyclability/test-methods/>

18. RecyClass Online Tool available at <https://recyclclass.eu/recyclability/online-tool/>

19. The list of recognised Certification Bodies is available at <https://recyclclass.eu/get-certified/recyclability/certification-bodies/>

20. Certificate code is a serial number that RecyClass issues as an identifier for each Certificate.

21. The list of recognised Certification Bodies is available at <https://recyclclass.eu/get-certified/recyclability/certification-bodies/>

22. The Certificate Code is a serial number that RecyClass issues as an identifier for each Certificate (LoC, DfR or RA).

23. The list of recognised Certification Bodies is available at <https://recyclclass.eu/get-certified/recyclability/certification-bodies/>

24. Eligibility for Recyclability Certifications describes that “packaging products must include all their different components and must be either pledged on the market or yet to be introduced with no further alternations to be made to its design.” More information available in section 8 of the document Quality Management and Procedures available at <https://recyclclass.eu/get-certified/recyclability/recyclclass-certification-documents/>

25. RecyClass Certification Mark Design Guidance is available at <https://recyclclass.eu/get-certified/use-of-claims/>

26. EN 15343:2007 Plastics. Recycled plastics. Plastics recycling traceability and assessment of conformity and recycled Content available at <https://www.evs.ee/en/evs-en-15343-2007>

27. ISO 22095 Chain of Custody – General Terminology and models available at <https://www.iso.org/standard/72532.html>

28. Commission Regulation (EU) 2022/1616 available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32022R1616>

29. Definitions extracted from EN 14021:2016 Environmental labels and declarations — Self-declared environmental claims (Type II Environmental labelling) available at <https://www.evs.ee/en/evs-en-14021-2004>

30. Definitions extracted from EN 14021:2016 Environmental labels and declarations — Self-declared environmental claims (Type II Environmental labelling) available at <https://www.evs.ee/en/evs-en-14021-2004>

31. RecyClass structure reported here <https://recyclclass.eu/structure-governance/>

RecyClass

RecyClass

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