RecyClass

AUDIT SCHEME
MODULE I:
LOOP REQUIREMENTS

RECYCLED PLASTICS TRACEABILITY CERTIFICATION

RECYCLED PLASTICS

VERSION 1.0

PUBLISHED ON 13th FEBRUARY 2024

RecyClass

RecyClass

1. INTRODUCTION

Module I includes requirements applicable to closed and controlled loop recycling. Module I.I requirements are applicable to closed loop for all plastics and controlled loop recycling for PVC. Module I.II describes a set of additional requirements for *Organisations* using *Recycled Input* under the scope of Commission 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. In this case, controlled loop requirements apply for types of products described in the categories included in Table 1 according to the derogation described in point 18 of the Regulation.

Module I.I is voluntary for all plastics. Module I.I and I.II are mandatory for post-consumer PVC *Recycled Input* under *Regulation.*

2. DEFINITIONS

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

Closed Loop
Process in which post-consumer or pre-consumer waste (*Recycled Input*) is collected and recycled so it is used again to make a product (*Recycled Output*) of an equivalent product category preserving the quality of the material.
[EN 17615:2022, 3.55]

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]

3. MODULE I.I: LOOP REQUIREMENTS

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

For all plastics, Closed Loop definition applies.

For post-consumer PVC *Recycled Input*, *Controlled Loop* requirements apply for recovered PVC with a lead concentration between 0,1 and 1,5% by weight. *Controlled Loop* requirements are described as indicated in *Regulation* and can be found in Table 1.

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.

Products with 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), products with PVC *Recycled Output* originating from a) to d) must only be used for type of products in any of the categories a) to d).

SECTION I.I.1 RECYCLED INPUT

I.I.1.1 SUPPLIER CERTIFICATE – WASTE ORIGIN

Supplier's Certificate includes documented evidence stating the waste origin of *Recycled Input*, including:

Origin of waste Pre-consumer Post-consumer	**Sector of the waste** Packaging, Agriculture Building & Construction Automotive, WEEE Other
Source of waste Household Commercial Industrial Other	**Type of waste** Construction profiles Bottles Etc.

Assessment level Category 1

SECTION I.I.2 RECYCLED OUTPUT

I.I.2.1 *RECYCLED OUTPUT* END USE APPLICATION

Recycled Input is used in the same type of application that originated it according to the *Supplier's Certificate* following the definition of *Closed Loop.*

In case of rigid PVC with a lead concentration between 0,1 and 1,5% by weight, see requirement I.I.2.2.

Assessment level Category 1

I.I.2.2 PVC *RECYCLED OUTPUT* END USE APPLICATION

In case of rigid PVC with a lead concentration between 0,1 and 1,5% by weight *Controlled Loop* requirements apply. Products with PVC *Recycled Input* originating from type of products from categories a) to f) from Table 1 may 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*), products with PVC *Recycled Input* originating from type of products from categories a) to d) may only be used for type of products in any of the categories a) to d).

Assessment level Category 1

4. MODULE I.II: RIGID PVC SPECIFIC REQUIREMENTS

I.II.1 MONITORING OF LEAD CONTENT

Organisation has received information about lead concentration from their supplier. Documented evidence of the lead concentration is available.

Otherwise, testing must be conducted. *Organisation* has a procedure in place to monitor the concentration of lead in the recovered rigid PVC to ensure that it is lower than 0,1 or 1,5%. The procedure describes the size and frequency of sampling. 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 recovered rigid PVC are sent to an external laboratory for the measurement of lead content in line with ISO 11885.

Assessment level Category 1

I.II.2 COMPLIANCE DOCUMENTATION

This requirement applies when *Organisation* is not the recipient of the *Recycled Input* to produce an article with recovered PVC (trading of recycled PVC activities). In this case, relevant information must be communicated to the customer. 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 I.I.1.1;
- Lead concentration of *Recycled Outptut* (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

I.II.3 LABELLING

Organisation has a labelling procedure in place to mark all products with *Recycled Output* with the message “Contains ≥ 0,1 % lead” as specified in *Regulation*, when the lead concentration is equal or higher than 0,1%.

Assessment level Category 1

RecyClass

c/o Plastic Recyclers Europe
Avenue de Broqueville 12
1150 Brussels – Belgium

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

www.recyclass.eu