



Centexbel QA-CER recycled content: Audit scheme Details



Introduction

Audit Scheme

General

A valid registration certificate of the organization must be presented at the time of the audit. The top management of the organization shall be determined.

Audit duration

The on-site audit duration is one day per production site for an initial audit. The duration of follow-up audits is one day with a minimum of 4 hours on-site audit.

The audit duration for non-producing sites (e.g. sales office, distribution center, logistics center) is one half day with a minimum of 2 hours on-site audit.

Remote audit

Remote audits are not allowed unless decided by the certification body. Initial audits are not done remotely.

Initial audit

Phase 1

The organisation shall have documented and implemented the quality management system (QMS) and the process flow.

Actions:

- The auditor shall request in advance the following documents: organizational chart and process flow
- The auditor shall verify whether the organisation has all required procedures installed and if the verification of implementation is possible.
- The auditor shall evaluate whether the organisation is ready for the phase 2 audit



Phase 2

The auditor shall verify the implementation of all requirements of the scheme.

Follow-up audit

A follow-up audit comprises all activities as described in the phase 2 audit above.

Quality management system and its processes (QA4.4)

The organisation shall determine the criteria and methods (including monitoring, measures, and associated performance indicators) needed to ensure that both the operation and management of processes used to produce and/or to distribute products with recycled content, are effective.

Questions:

- *Are there specific “criteria” for the purchase – processing – control – sale - of recyclates or raw materials, semi-fabricates or end products fully or partly incorporating recyclates?*
- *Are there specific “processes” related to the reception, storage, any pre-treatment (purifying, compounding etc.) and processing of recyclates, and how are these managed?*
- *Are there processes needed for the recyclate management system that are outsourced, and how are they managed?*

Documented information (QA7.5)

The organisation shall establish records to provide proof that recyclate flows are followed up. Records relating to end products containing recyclate shall be managed.

Questions:

- *What records are kept within the internal recycling process?*
- *What records are kept for the processing of internal recyclate?*
- *What records are kept for the processing of external recyclate?*
- *What records relate to the conversion of waste flows into raw materials?*
- *Do the records include the customer’s traceability requirements?*
- *In what ways is the traceability of recyclate content of products guaranteed?*
- *The organisation shall establish the way in which the required records are stored and destroyed.*



Leadership and planning (QA5.2 Quality policy - QA6.2 Quality objectives and planning to achieve them)

The top management shall provide proof that the recyclate management system is included in the quality policy, that the quality policy is communicated within the organization and that the associated quality objectives have been established for the relevant job descriptions and levels within the organisation.

Questions:

- *Has the quality policy been translated into the use of recyclate in end products?*
- *Has the quality policy, as it relates to recycling, been translated into purchasing, sales, product development, production, quality control etc.?*
- *Are there quantifiable targets for the use of recyclate?*
- *Are these targets periodically discussed and evaluated?*

Support

QA7.3 Awareness: The organisation shall ensure that its employees are aware of the importance of their activities and how they contribute to reaching the product conformity.

Questions:

- *What specific communication towards the employees is made concerning the recycling process and the use of recyclate?*
- *Are there specific training courses provided relating to the evaluation, rejection or release and use of recyclate and products made on the basis of recyclate?*

QA7.1.3 Infrastructure: The organisation shall provide the infrastructure needed to reach the product conformity targets.

Questions:

- *What specific provisions have been made for receiving, identifying, storing, inspecting, possibly pre-treating and processing recyclate?*
- *What are the possibilities of the IT systems to follow the recyclate streams?*

QA7.1.5 Monitoring and measuring resources: The organisation shall determine the monitoring and measurement to be undertaken and the monitoring and measuring equipment needed to provide evidence of conformity of the product to determined requirements.

Questions:

- *Are there specific tests for recyclate (entry control) - products based on recyclates (final control)?*



- *How are controls undertaken?*
- *In what way are the measurement instruments verified?*

Operation

QA8.1 Operation planning and control: The organisation shall plan the processes needed for product realisation: determination of requirements for the product, validation and test activities and records of them.

Questions:

- *How do you provide proof of the use of the applied quantity (content) of recyclate and of the conformity of the end product in which the recyclate is incorporated?*

QA8.2.1 Customer communication: The organisation shall determine and implement effective arrangements for communicating with customers in relation to the use/processing of recyclate and on the percentage of recycled content.

Questions:

- *Have you communicated with the customer over the use of recyclate and what are the specific agreements (product information sheets, packaging, website etc.)?*

QA8.2.2 Determination of requirements related to the product: The organisation shall determine the requirements specified by the customer or requirements not specified by the customer but necessary for specified or intended use.

Questions:

- *Are there specific demands from the customer for recycling or recycled content?*
- *Do these demands always apply or is it possible to deviate from them depending on the availability of recyclate?*
- *Is the quality level of the recyclate used constant? Can this be demonstrated on the basis of records?*
- *Does the final product comply with the regulations for Reach and RoHS (limitation of dangerous substances: lead, mercury, cadmium, chrome VI, polybrominated biphenyl, polybrominated diphenyl ether)? What documents can be presented to support this?*
- *Are the product characteristics conform to the applicable customer or market requirements?*

QA8.3 Design and development: The organisation shall manage the design and development of the product with respect to the product conformity requirements.

Questions:

- *Is the use of recyclate specifically included in the design?*
- *Is the quality level of the recyclate very important to achieving the quality of the end product? If so, how can this quality level be guaranteed?*



- *How do you deal with the requirements relating to the use of recyclate material?*
- *Do you distinguish between internal and external recyclate?*
- *How are changes in design and development managed?*
- *Are there specific test runs for the products based on recyclate?*
- *Are the new products based on recyclate released positively?*
- *Does product information exist with product specifications of products in which recyclates are incorporated? Is the recyclate content indicated in this product information?*

QA8.4.2 Control of externally provided processes: The organisation shall ensure that the specifications for goods purchased include the information needed with respect to the recyclate content and ensure that the goods purchased meet the specified purchasing requirements associated with the goods.

The demonstration of traceability of purchased recyclates shall be based on third party verification/certification schemes by accredited certification bodies. To that end, the following (non-exhaustive list) certificates are considered to be trustworthy : PolyCertEurope recognized schemes and certification bodies, Recyclclass Recycled Plastic scheme certified by accredited certification bodies, or other schemes certified by an approved certification body ,

Questions:

- *Are there specifications for recyclate? Are these controlled and guaranteed by the supplier?*
- *Are there different types of recyclate in relation to the product and how are they requested?*
- *What is the procedure for requesting and releasing a new recyclate?*
- *Is the origin of the recyclate purchased known or traceable?*
- *Are the recyclates purchased clearly identified as recyclate?*
- *Are recyclates purchased with the relevant traceability requirements (from pre- or post-consumer waste streams)?*

QA8.4.3 Control of externally provided processes: Verification of the specifications of goods purchased must be carried out. Records of the results of the verification shall be kept along with any measures needed.

Questions:

- *Is there an (administrative/visual/auditing) control upon entry and registration for the recyclates or products in which recyclate is incorporated?*
- *Are test reports or product certificates supplied along with the various supplies of recyclate?*
- *Are released raw materials indicated as such?*
- *What happens to non-conforming recyclates?*



QA8.5.1 Management of production and services: The organisation shall plan and carry out production under controlled conditions for all the sub-processes in which recyclate is processed.

Questions:

- *How is processing managed?*
- *Are there specific controls for products based on recyclate?*
- *Are there clear production instructions for the processing of recyclates?*
- *When using recyclates, do you use the same process parameters as those applied when you work without incorporating any recyclate?*
- *How is the quality of the end product incorporating recyclates controlled and guaranteed?*
- *How do you ensure the desired recyclate content during production?*
- *Are there specific procedures for dealing with recyclate and the uncertainties associated with it?*
- *What are the most important process parameters that must be controlled when processing recyclates?*
- *How do you determine the process parameters and tolerances for these parameters that are applied when processing recyclates?*
- *Do the end products have the same (internal) specifications as identical end products made with virgin granulate?*

Calculation of Recycled content: The organization shall determine the recycled content in a product according to EN 15343:

Recycled Content will be expressed as a percentage of the total weight of a product, or a component as follows:

$$TR = RC_{pre} + RC_{post}$$

Where:

- TR = Total Recycled Content (%)
- RC_{pre} = Pre-Consumer Recycled Content (%)
- RC_{post} = Post-Consumer Recycled Content (%)

Only the components, products or family(s) of products using Recycled Input will be considered in the calculation. Recycled Input content may consist of a certain pre/postconsumer.



QA8.5.2 Identification and traceability: The organisation shall identify the use of recyclate by suitable means throughout product realisation.

Questions:

- *Are the recyclates to be used clearly identified?*
- *Is there a specific coding of recyclate and the quantities present in the end product?*
- *Is there a clear traceability system with respect to the use of recyclates?*
- *What data is traceable and what is its relevance?*
- *How are the end products with recycled content identified?*
- *Can the organization produce a list of (end) products or product families with recycled content and how is this list managed with respect to the scope (and if applicable the annex) of the certificate?*

Measurement, analysis, and improvement

QA8.7 Management of nonconforming outputs: The organization shall ensure that a product which does not conform to product requirements relating to the use of recyclate is identified to prevent its unintended delivery. Records of the nature of nonconformities and any subsequent actions taken, including deviations and concessions obtained, shall be maintained.

Questions:

- *How are “nonconforming recyclates” managed?*
- *What if there is no recyclate left?*
- *Are there alternatives for recyclate and how are these systems set up and guaranteed?*

Product controls

QA11.1 Management of product controls: The organisation shall clearly describe the products that come under the certificate. A description can be made using clearly defined product families.

Questions:

- *How are products covered by the certificate identified in the internal and external documentation?*
- *Who is responsible for updating the list of products covered by the certificate?*



ECO parameters

QA11.2 Management of ECO parameters: The organisation shall demonstrate compliancy with the environmental legislation parameters as defined in local and European legislation.

Questions:

- *How is quality control organized to ensure that no products above the specified concentration limits are present that feature on the REACH (EU Reach regulation) or RoHS list from the European Restriction of Hazardous Substances directive?*
- *Is the Reach declaration covering registration, SVHC and restriction?*