flustix certification scheme

for the award of the flustix RECYCLED seal



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Change history

Version	Date	By	Summary of the change
1.0	28/11/2025	Malte Biss	First version of the document was created
2.0	02/03/2026	Malte Biss	- Revision of accepted pre-certifications (Section 6.4) - Clarification and application of the definitions Manufacturer / Processor / Production Site (Section 3.7, Section 8.5, Section 9.1) - Editorial amendments
3.0	18 October 2026	flustix	- Scope, definitions and standards (Sections 1–3) - ISO/IEC 17065, auditor competence/training and responsibilities (4; 8.3; 8.10.2) - FCM: compliance pathways, existing evidence, supply chain and deferred scope (5.2; 6.2; 8.2; 9.1; Annex A 1.1) - PCR/PIR, staged supplier evidence, pre-certification, ISCC PLUS and reference masses (6.1–6.4; 9.5) - Geographical origin and optional French criteria (6.5) - Site sampling, audit formats, trader surveillance and Category 2 (5.3; 7.2–7.4; 8.3; 10.2) - Surveillance/renewal: three-month grace, expiry and validity (7.3.2; 8.7–8.9) - QMS, environmental impacts, social/occupational safety and non-conformities (5.3; 8.3; 9.3; 9.10) - Applicable test evidence instead of blanket annual analyses (9.3.5; Annex A 1.1) - Stocks, mass balance, returns, losses and recycled-content calculation (9.6–9.8) - Certificates, mark claims and scheme changes (8.2–8.5; 8.10) - Chemical recycling: Module A, physical/attributed quantities and communication (1; 2; 3.20; 6.3; 8.2; Module A) - PET declarations, origin and retention also for mechanical routes (6.2; 9.3.5) - Editorial changes, language alignment and table pagination

flustix GmbH

Founded in 2017, the flustix initiative aims to support the responsible use of resources, particularly plastics. As the first of its kind in Europe, the flustix seals serve as a trademark for the sustainable use of plastics and other resources. In cooperation with internationally accredited certification and laboratory partners, flustix analyses materials, products and packaging with regard to their plastic content, their recyclability or the use of recycled materials of various kinds. All this is done to enhance the responsible use of resources and to come closer to the vision of an efficient circular economy.

The flustix initiative and the certification marks awarded serve as reliable guidance for consumers and businesses in the purchase and sale of sustainable goods. The primary objective of flustix is to reduce the excessive use and new production of plastics and to promote a functioning circular economy across materials, in order to prevent negative impacts on health and the environment. flustix recognises the importance of plastics as a valuable material and its diverse applications, such as in the fields of safety, transport, medicine and research. The main mission is the responsible use of all resources, especially plastics. flustix actively interacts with companies and consumers for the benefit of health and the environment.

flustix offers six trustmarks: the three "flustix LESS PLASTICS – MIN. XX% PLASTIC-FREE" trustmarks and the "flustix PRODUCT CONTENT MICROPLASTIC-FREE" trustmark certify – in collaboration with accredited testing laboratories and certification bodies – the entire product, its packaging, or the formulation itself. flustix RECYCLABLE confirms and communicates the recyclability of packaging. The flustix RECYCLED label certifies recyclates, semi-finished goods, and products or packaging containing recycled content.

flustix RECYCLED certification history

In January 2021, flustix, in cooperation with its accredited certification partner, began awarding the “flustix RECYCLED” label on the basis of the certification scheme “Products Made from Recycled Materials – flustix,” according to the versions 2019-02 / 2019-07 / 2019-11 / 2020-07 / 2021-10 / 2022-07 / 2023-02 / 2023-10 / 2024-06.

In 2025, flustix developed a new certification scheme within a formal committee procedure in consultation with an international expert group and, in November 2025, published this scheme under the title “flustix certification scheme for the award of the flustix RECYCLED seal”.

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1 Area of application

The certification scheme applies to all products made from recycled materials, including plastic, metals, paper, cardboard, carton and glass. It defines all the criteria required to obtain the flustix RECYCLED seal. The main focus of the certification scheme is on the assessment of the traceability system and the resulting determination of the proportion of recycled material in the product. However, the scheme does not provide any information on the quality, functionality or physical properties of the product. It is not intended for the assessment of reused components.

The certification scheme explicitly excludes certain products, semi-finished products and materials from certification due to potentially hazardous waste sources:

- Products contaminated by radioactive contact
- Medical products
- Products that do not fulfil the requirements of the (EC) regulations and/or technical rules for hazardous substances

This certification scheme determines the requirements for the product, the recording of mass flows of recycled materials used, the tracking of recycled materials as well as for conformity control, monitoring and certification.

Products, semi-finished products and materials expressly intended for food-contact applications within this certification, or marketed with corresponding compliance claims, are subject to the additional requirements in Section 5.2 and Annex A 1.1. The assessment takes account of the applicable requirements of Regulations (EC) No 1935/2004, (EU) No 10/2011 and (EU) 2022/1616. Where no food-contact use or suitability claim is intended for the certified item, evidence of food-contact suitability is not required under this certification.

This certification scheme applies to all actors along the supply chain who take ownership of the material. These include manufacturers, processors, recyclers, as well as traders with or without physical storage. Traders must be included in the traceability system, otherwise the closed supply chain would be interrupted.

For chemical recycling of plastics, the separate Module A Chemical Recycling, Version 1.0 dated 18 October 2026, is mandatory. It also applies to downstream processing and trading of materials already carrying mass balance attributed content. Mechanical recycling and solvent purification without a change in polymer structure follow the main scheme unless already-attributed materials are used. The module's expressly stated specific requirements apply to the relevant scope; mandatory law takes precedence. Module A is distinct from the existing Annex A of this main scheme.

2 Testing and certification principles

The standards listed below form the basis for testing and certification. If a date is specified, this refers only to the version specified. For documents without a date, the latest version including all amendments applies.

The following standards and legislation apply where relevant to the material and intended application of the certified item.

DIN 6730	Paper, board and pulp - Definitions
DIN EN 643	Paper, board and cardboard - European list of standard grades of recovered paper
DIN EN 15343	Plastics - Recycled plastics - Traceability in plastics recycling and assessment of conformity and recycled content
DIN EN 15342	Plastics - Recycled plastics - Characterisation of polystyrene (PS) recyclates
DIN EN 15344	Plastics - Recycled plastics - Characterisation of polyethylene (PE) recyclates
DIN EN 15345	Plastics - Recycled plastics - Characterisation of polypropylene (PP) recyclates
DIN EN 15346	Plastics - Recycled plastics - Characterisation of polyvinyl chloride (PVC) recyclates
DIN EN 15347	Plastics - Recycled plastics - Characterisation of plastic waste
DIN EN 15348	Plastics - Recycled plastics - Characterisation of polyethylene terephthalate (PET) recyclates
DIN EN ISO 472	Plastics - Technical terms
DIN EN ISO 14021:2021-10	– Environmental labels and declarations – Self-declared environmental claims (Type II environmental labelling)
ISO 22095:2020-10	Traceability of supply chains - General terminology and models
CEN/TR 15353	DIN Technical Report Plastics - Recycled plastics - Guidelines for the development of standards for recycled plastics
ISO 19011	Guideline for the auditing of management systems
ISO/IEC 17020	Conformity assessment - Requirements for the operation of different types of bodies performing inspections
ISO/IEC 17065	Conformity assessment - Requirements for bodies certifying products, processes and services
EC 1935/2004	Materials and articles intended to come into contact with food (Framework Regulation)
EU 10/2011	Plastic materials and articles intended to come into contact with food
EU 2022/1616	Recycled plastic materials and articles intended to come into contact with foods

EC 2023/2006	Good manufacturing practice for materials and articles intended to come into contact with food

- this certification scheme
- the general terms and conditions of contract and certification of the certification body
- the flustix RECYCLED Styleguide
- the scale of fees and charges of the certification body

For plastics, DIN EN 15343:2008-02 provides the technical basis for assessing traceability, conformity and recycled content. DIN EN ISO 14021:2021-10, particularly Clause 7.8, informs terminology and recycled-content claims. The chain-of-custody requirements follow ISO 22095:2020-10.

Where applicable, Module A forms part of the assessment basis. Statutory recycled-content evidence for single-use PET beverage bottles must additionally comply with Commission Implementing Decision (EU) 2026/1425, including its corrigenda, whether mechanical or chemical recycling is used. Regulation (EU) 2025/40 and its supplementary acts apply according to their respective scope and application dates. Voluntary flustix certification alone does not establish eligibility for a statutory target; the product-specific conditions must be demonstrated separately.

Irrespective of this certification scheme, the express obligation to comply with the laws and regulations applicable to the products in question remains in force.

3 Definitions of terms

3.1 Waste before use (industrial waste)

Waste before use (industrial waste) refers to material that is generated as waste during manufacturing or processing operations and is diverted from the resulting waste stream before it reaches use by end consumers. This does not include materials that can be directly reintroduced into the same technical process without leaving it (e.g., internal rework returns, regrind, or process-internal scrap).

3.2 Waste after use

This material comes from households, commercial and industrial facilities or institutions that are end users of the product and can no longer be used for its original purpose. It also includes returned material from the supply chain.

3.3 (Waste) glass

Glass is an inorganic, non-metallic material produced by complete fusion of raw material at high temperature into a homogeneous liquid, which is then cooled to a solid state without significant crystal formation.

Used glass refers to used glass that is collected for recycling. This is glass packaging such as bottles, jars and other glass containers that are returned or disposed of after use. This glass is collected, processed and then melted down to produce new glass products.

3.4 (Scrap) metal

Scrap metal typically refers to metallic waste or residual materials resulting from industrial processes, construction, the manufacturing industry or the consumption of products that can be recycled or returned to the production process. There are different types of scrap metal, divided into:

- Heavy scrap: Large pieces such as old railway tracks or shipwrecks
- Light scrap: Thin metal products such as wire or sheet metal scraps
- Household waste: old household appliances, cans, tools and similar items
- Production scrap: Waste that comes directly from production processes, such as chips, cuttings or defects
- Electronic waste: This refers to electronic and electrical devices at the end of their service life

3.5 Products Leaving the Certified Process

Products leaving the process for which certification was requested.

3.6 Batch / lot

For the purposes of this certification scheme, a batch (lot) is a quantity of material treated as a unit and assigned a unique identifier.

The identifier must enable the quantity to be linked to its origin and to the relevant processing and delivery evidence. The composition relevant to determining the recycled content of the batch must be documented.

Batches must remain traceable within the defined process boundaries in accordance with DIN EN 15343 and ISO 22095.

3.7 Manufacturer / processor / manufacturing facility

The companies or production facilities that carry out the various stages of the manufacturing process are referred to as manufacturers / processors. A manufacturer / processor may carry out several of these manufacturing phases simultaneously and may also hold a certificate.

Companies that exclusively source fully certified products or components, use them without modification, and perform only activities such as filling, labeling, marking, or placing them on the market are not considered manufacturers or processors within the scope of this certification program.

Such activities do not constitute a processing step that affects the recycled content, material composition, or traceability of the certified product, provided that the certified product or certified component remains physically and materially unchanged.

3.8 Component

The specific components of the end product, especially if it contains different plastic parts, other materials or other ingredients.

3.9 Plastic

Material consisting of a polymer as defined in Article 3(5) of Regulation (EC) 1907/2006 to which additives or other substances may have been added and which may act as the main constituent of the final products, with the exception of natural polymers which have not been chemically modified.

3.10 Mixture of PCR and PIR (MIX)

A mixture of PCR and PIR (MIX) refers, within the scope of this certification program, to recycled input or recycled content that consists of a combination of post-consumer recycled materials (PCR) and post-industrial recycled materials (PIR).

3.11 Multisite

A standardised quality management system is used at various locations to carry out identical production steps. In addition, there is a legal or contractual agreement that enables a central organisation to implement corrective measures.

3.12 Post-consumer recyclates (PCR)

Post-consumer recycled material (PCR) refers to recycled material originating from waste streams generated after use by end consumers. The term is used in alignment with DIN EN ISO 14021 (Section 7.8.1.1).

3.13 Post-industrial recyclates (PIR)

Post-industrial recycled material (PIR) refers to recycled material originating from waste streams generated during industrial manufacturing or processing operations prior to use by end consumers. The term is used in alignment with DIN EN ISO 14021 (Section 7.8.1.1).

Addition to 3.12 (PCR) and 3.13 (PIR):
For this certification scheme, PCR and PIR terminology is based on DIN EN ISO 14021:2021-10, Clause 7.8.1.1, and applied to plastics with reference to DIN EN 15343:2008-02. In-process returns that can be reused within the same manufacturing process do not create an additional PIR share.

3.14 Product

A material, article or semi-finished product consisting wholly or partly of recycled material and certified under this scheme.

3.15 Product code

Unique transaction code for an incoming batch of material.

3.16 Product family

A group of products manufactured with the same processing technology, within the same product line, to a similar recipe and for similar applications, and containing materials of the same waste origin.

3.17 Process

The entire manufacturing process of the certified product fulfils the requirements of DIN EN 15343 for the traceability of plastics. For traceability reasons, this process can also be adopted for some other materials.

3.18 Recycled material

This material has been produced by reprocessing recovered (recycled) material using a manufacturing process and processed into an end product or a component of an end product. It can be obtained both from waste before its utilisation and from waste after its utilisation.

3.19 Recycled input

Recycled input means the quantity of recycled material actually fed into a defined manufacturing process. Input batches must be uniquely identifiable; their origin, supplier, material type, quantity and PCR or PIR classification must be documented. Section 6.4 governs the conditions under which input may be counted towards certified recycled content.

3.20 Recycled content

The mass fraction of recycled material in a product, individual components or regranulate, whether in packaging, product or other form, is referred to as the recycled content. It is important to note that according to the following definitions, only pre-consumer/post-industrial recycled material (PIR) and post-consumer recycled material (PCR) may be included in the calculation of the recycled content. PCR attributed through mass balance under Module A must be identified separately and must not be presented as physically contained recycled content. Its calculation and onward transfer follow Module A, particularly Sections 5.2 and 7.

3.21 Traceability

Traceability refers to the ability to trace the history, use, location or source of a material or product throughout the supply chain, in accordance with ISO 22095:2020, definition 3.6.1.

3.22 Uncontrolled recycled input

Uncontrolled recycled input means recycled material whose origin, quantity or route through the supply chain cannot be sufficiently demonstrated. It must not be counted towards the certified recycled content. During the transitional period under Section 6.4, the absence of a supplier certificate alone does not mean that traceability is lacking.

3.23 Recovered (recycled) material

This material has been collected and recovered (recycled) instead of being disposed of or used to generate energy and is now used in a recycling or manufacturing process instead of new primary material.

4 Requirements for third-party bodies (certification bodies, inspection bodies and auditors)

The third-party bodies (certification bodies, inspection bodies and auditors) involved in the process of awarding the flustix RECYCLED seal must prove that they are neutral, independent and competent. This ensures consistent process quality and strengthen confidence in the process.

4.1 Requirements for certification bodies

Certification bodies participating in this scheme must be accredited to ISO/IEC 17065 and have a co-operation agreement with flustix for the award of the flustix RECYCLED seal. Their accredited scope must be suitable for the certification activities undertaken; a certification may be described as accredited only where its specific scope is covered by the accreditation. Before recognition, flustix verifies evidence of accreditation and the body's technical competence for the scheme.

The scheme owner decides on recognition of certification bodies, equivalent schemes and evidence, and on binding interpretations and development of scheme requirements. It sets the scheme rules for audit scope, sampling and audit formats, where appropriate in consultation with the certification body. The certification body conducts conformity assessment independently and alone decides whether to grant, maintain, extend, restrict, suspend or withdraw an individual certificate. Interpretations and recognitions by the scheme owner must not predetermine that independent decision.

Certification bodies must ensure that changes to the scheme and binding interpretation guidance are communicated promptly to, and applied by, the personnel they use. flustix offers technical exchange when needed, including digitally. Participation is required where material changes or differences in interpretation affecting the body need to be resolved. Communication of relevant changes must be documented.

If the certification body delegates audits to subcontractors, these subcontractors must comply with the requirements listed below and be contractually bound to the certification body.

An up-to-date list of certification bodies recognised by flustix is available at http://www.flustix.com/

At least annually, flustix monitors consistent application of this scheme by its recognised certification bodies. It reviews samples of audit reports, qualification records, application of recognition rules and handling of non-conformities. Findings and required corrective actions must be documented. The certification decision for an individual application remains with the responsible certification body.

4.2 Requirements for inspection bodies

The inspection bodies must be accredited in accordance with ISO/IEC 17020 and be contractually bound to the commissioning certification body.

Inspection bodies must take account of scheme amendments and relevant interpretation guidance in their audits. Where needed, they participate in technical consultations or witness audits; these may be digital where suitable. The certification body ensures that its contracted inspection bodies and auditors receive the information required for their assignments. An up-to-date list of recognised inspection bodies is available at www.flustix.com or from the certification bodies.

4.3 Requirements for auditors

Auditors must meet the applicable requirements of ISO 19011 and demonstrate relevant prior education and practical experience for their audit assignment. The certification body accredited to ISO/IEC 17065 is responsible for training its auditors specifically in this flustix RECYCLED certification scheme and its audit method before their first assignment. Where relevant to the assignment, training covers DIN EN 15343, ISO 22095, traceability, mass and volume reconciliation, and the assessment of PCR and

PIR. The certification body documents education, experience, scheme-specific training and approval for the audit scope, and periodically reviews competence. Food-contact assessments additionally require demonstrated competence in the applicable legal framework within the audit or technical review team. Where Module A applies, the audit or technical review team must additionally demonstrate the process- and attribution-specific competence required by its Section 4. The certification body remains responsible for training and approval.

Auditors take part in technical exchange or witness audits where required for a consistent audit approach or to resolve technical differences. The certification body arranges necessary updates and documents their communication to the auditors concerned.

A current list of auditors recognised by the certification bodies is available from the certification bodies.

5 Product requirements

5.1 Supplier declaration and information on recycled content

DIN EN ISO 14021 sets requirements for supplier declarations, including use of the three-arrow symbol for recycled products where applicable. Recycled-content information must be stated separately for product and packaging and must not be combined. Physical shares are calculated in accordance with DIN EN ISO 14021. For guaranteed minimum claims, confirmed values are rounded down to whole percentage points; calculations retain sufficient precision. Other presentations must not overstate the evidenced share. Attributed shares additionally follow Module A and its Section 7.6.

Based on the guidelines for self-declaration in accordance with DIN EN ISO 14021, this certification scheme defines the measures required to present the recycled content confirmed by an independent body using the flustix RECYCLED seal.

Certificate information and audit reports must state physically evidenced PCR and physically evidenced PIR separately as percentages. Where Module A applies, mass balance attributed PCR must additionally be reported as a separate mass and percentage of the same reference item. Absent shares are stated as zero. Any additional combined figure must identify the evidence routes, exclude double counting and not exceed 100%.

If PCR and PIR shares cannot be determined and evidenced unambiguously, no PCR- or PIR-specific claim may be made for the quantities concerned. Only demonstrably eligible quantities may enter the stated recycled content; their separation and calculation must be documented in the audit report.

5.2 Products intended for food contact

Products, semi-finished products and materials expressly intended for food contact, or marketed with corresponding claims, must comply with the applicable food-contact requirements. Existing evidence is assessed and, where appropriate, recognised under Annex A 1.1.

For chemically recycled materials, determine the actual compliance route under Module A Section 5.3, including the Article 1(3) exception in Regulation (EU) 2022/1616 where its conditions are demonstrated. Recycled-content or mass balance evidence does not replace required evidence of food-contact suitability.

These include in particular:

- Evidence of authorisation of the recycling process under Regulation (EU) 2022/1616 where authorisation of that individual process is required
- Evidence of the required entry in the Union Register where applicable to the recycling technology and operator concerned
- Positive opinion of the European Food Safety Authority (EFSA), where applicable
- Declaration of the intended use (Intended Use)
- Submission of the Declaration of Compliance (DoC) required for the material and its intended use
- Compliance with the requirements of Reg. (EC) 2023/2006 on Good Manufacturing Practice

5.3 Operational performance requirements (audit criteria)

The audit criteria are standardised and divided into two categories that define the level of importance and accuracy that the respective facility must achieve for each requirement in order to successfully pass the certification process.

Category type 1
This is a mandatory requirement. The object of conformity must fulfil the required standards for type 1 categories in order to obtain certification. Minor deviations may be accepted under certain circumstances.

Category type 2
These requirements are preferred. At least 50% of the applicable Category 2 requirements must be met. Each uniquely numbered requirement is assessed once with equal weight; repeated prompts are not counted again. Non-applicable requirements must be justified and excluded from both numerator and denominator. If none apply, record that outcome. This assessment does not reduce Category 1 requirements or mandatory legal obligations.

6 Traceability requirements

6.1 General information

The traceability of recycled materials, such as plastics, is a crucial aspect of certification and a primary focus during the audit. According to ISO 22095:2020, traceability is defined as the ability to trace the history, use or location of a product. Traceability enables to track the movement of a product and its components through different stages of a process or operation.

The flustix certification scheme for recycled content focuses on the traceability systems established within a process or procedure. It assesses the chain of custody along the entire value chain of the recycled material to ensure that traceability is maintained.

For products intended for food contact, the origin of recycled materials must be clearly documented. Supplier evidence must show compliance with the applicable requirements of Regulation (EU) No 10/2011 and Regulation (EU) 2022/1616, including authorisation of an individual recycling process where required. Traceability must extend to the relevant source material. Apply the compliance route established under Section 5.2 and, where relevant, Module A Section 5.3; where the Article 1(3)

exception in Regulation (EU) 2022/1616 is demonstrated, registration or authorisation evidence not applicable under that Regulation is not required.

6.2 Supplier declarations / certificates

Traders involved in the flow of goods are treated as follows:

- Traders with physical storage (e.g. interim storage, transshipment, repackaging) are subject to the full certification requirements. They must undergo an audit to demonstrate proper segregation, labelling and documentation of the recycled materials
- Traders without physical storage (brokers and trading-only entities) are covered by document review if they can demonstrate material identity and a complete goods and evidence trail. Supplier certificates, where required by Section 6.4, must be passed on in full. Traders must be clearly identified within the supply chain
- For food-contact products, supply-chain operators must demonstrate that the input materials meet the applicable requirements of Regulation (EU) 2022/1616, including authorisation of an individual recycling process where required. Operators with physical storage are subject to the full certification requirements; brokers without storage must retain complete records. Apply the compliance route established under Section 5.2 and, where relevant, Module A Section 5.3; where the Article 1(3) exception in Regulation (EU) 2022/1616 is demonstrated, registration or authorisation evidence not applicable under that Regulation is not required

Where statutory recycled-content evidence for single-use PET beverage bottles is claimed under Implementing Decision (EU) 2026/1425, additionally review and forward the batch declarations required for the relevant supply-chain stage under Article 8(3) and Annex V and, where applicable, the verification certificates under Article 8(10). This also applies to purely mechanical recycling. Demonstrate the applicable origin and country conditions and the correct calculation under Articles 5 and 6. Retain received supplier declarations for at least five years. Unchanged trading without mixing requires complete onward transfer of received declarations, with traceable allocation of split quantities.

6.3 Controlled mixing model

In plastics recycling and compounding, recycled plastics are often mixed with additives, masterbatches or virgin material to achieve specific properties. Under the controlled-blending model described in ISO 22095:2020, the certification covers recycled plastics mixed with other materials or substances, resulting in a known recycled share in the final product. The model requires the recycled material to be physically present.

The controlled blending model places emphasis on physical traceability, specifying a known percentage of recycled plastic in the final product. The organisations operating within the supply chain of the product or plastic must ensure that the physical input and output of the recycled plastic assessed during the audit is identified, monitored and documented. This model applies accordingly to other recycled materials. For mass balance attribution under Module A, its Sections 5.2 and 7 replace the restriction to physically known shares. An already-attributed input retains its attributed status through

downstream stages. Physical material balances and attribution accounts must be kept separately and reconciled.

6.4 Supplier attestations / certificates

The recognition of existing evidence supports market harmonisation, reduces avoidable administrative burdens and prevents additional barriers for companies within the supply chain. The objective is to strengthen the circular economy by allowing already qualified materials to be used further along the supply chain without repeated verification.

At initial certification, at least two thirds of the recycled input counted must come from suppliers holding a valid, recognised certificate. This rises to at least 75% at the first surveillance audit and 100% at the second. During the transitional period, material without a supplier certificate may be counted only where its origin, quantity, PCR/PIR classification and traceability throughout the supply chain are demonstrated by verifiable documents and assessed in the audit. Material without sufficient traceability is never eligible. From the second surveillance audit onwards, only deliveries covered by valid, recognised supplier certificates may be counted. Where Module A applies, its Section 6.2 also applies; the staged approach permits neither unsupported attributed quantities nor deferral of required statutory verification.

6.4.1 Plastics

Recognised supplier certificates for recycled plastics must be based on certification schemes with requirements for traceability and chain of custody equivalent, for the relevant scope, to DIN EN 15343:2008-02 and ISO 22095:2020-10. Where Section 6.4 requires a supplier certificate, it must be valid and cover the delivered material and relevant supplier or site. flustix RECYCLED certificates and certificates from other schemes recognised by flustix may be accepted:

EuCertPlast and/or RecyClass

flustix recognises certificates from EuCertPlast and RecyClass for recycled plastics in the form of products, semi-finished products, granulates, flakes, pellets and similar forms that are produced by

EuCertPlast and/or RecyClass
c/o Plastics Recyclers Europe
Avenue de Broqueville 12
1150 Woluwe Saint-Pierre
Brussels, Belgium

have been issued. These certificates from EuCertPlast and/or RecyClass are recognised, provided they are valid at the time of the certification procedure and the award of the "flustix RECYCLED" seal. In such cases, auditing of the recycling and/or production site may be waived.

In addition, the Blue Angel – DE-UZ 30a “Products Made from Recycled Plastics” (award criteria of the German Environment Agency; certification awarded by RAL gGmbH, Fränkische Straße 7, 53229 Bonn, Germany) may be recognized as suitable evidence of the declared recycled content, provided that the requirements of the applicable award criteria are fulfilled and the recycled content is documented in a transparent and traceable manner.

The scheme owner decides whether a previously unrecognised certification scheme or item of evidence is equivalent, where appropriate in consultation with the certification body. For an individual delivery, the certification body verifies the validity, scope and attribution of the recognised evidence.

ISCC PLUS may be recognised as prior certification where the material, facility, activity, period and actually confirmed evidence route cover this scheme's requirements. Chemical recycling and attributed inputs require the gap assessment under Module A Section 6.2. A general circular claim, free attribution, energy-based credit or cross-site credit transfer does not by itself establish an eligible PCR amount under that module. For all recognised schemes, including RecyClass, check PCR/PIR origin and the reference mass; supplier percentages may be transferred unchanged only where the calculation basis is the same. Requirements already demonstrated by equivalent evidence are not fully reassessed.

Blue Angel – Recycled Plastics

flustix recognizes the Blue Angel – DE-UZ 30a "Products Made from Recycled Plastics" as suitable evidence of the declared recycled content, provided that the requirements of the respective award criteria are met and the recycled content is transparently documented.

Award criteria authority: German Environment Agency (Umweltbundesamt)

Awarded by:

RAL gGmbH
Fränkische Straße 7
53229 Bonn
Germany

Recognition is granted on the condition that the certificate is valid at the time of the certification process and that the declared recycled content is clearly documented.

PolyCert Europe

flustix recognises certificates from selected members of the PolyCert Europe association for recycled plastics in the form of products, semi-finished products, granulates, flakes, pellets or similar, which are produced by selected members of the PolyCert Europe association.

PolyCert Europe
Avenue de Cortenbergh 71
BE-1000 Brussels

have been issued. These are recognised by flustix, provided they are valid at the time of the certification process and the award of the "Flustix RECYCLED" seal. In such cases, auditing of the recycling and/or production site can be waived.

The selected members of PolyCert Europe currently include the

- **Certification system of BQA and certification system "QA-CER Recycled Content" (Belgian Quality Association), Technology Park 7, 9052 Zwijnaarde, Belgium**
- **Certification system of AENOR** (Asociación Española de Normalización y Certificación), C/Génova 6, 28004 Madrid, Spain

Additional certifications can be recognised by flustix after the respective certification scheme has been checked for equivalence with other recognised schemes and the principles of DIN EN 15343 and ISO 22095:2020-10.

6.4.2 Fiber-based materials (paper and paperboard)

For fiber-based materials in the paper and paperboard sector, the following forms of evidence are recognized:

Blue Angel – Paper and Paperboard

flustix recognizes relevant Blue Angel award criteria for paper and paperboard (e.g., DE-UZ 14 for recycled paper as well as corresponding award criteria for packaging board and corrugated board) as suitable evidence of the declared recycled content, provided that the respective award criteria specify a defined minimum share of post-consumer recycled content and that this share is clearly documented.

Award criteria authority: German Environment Agency (UBA)

Awarded by:

RAL gGmbH
Fränkische Straße 7
53229 Bonn
Germany

Recognition is granted on the condition that the declared recycled content is transparently documented and can be clearly attributed to the material used.

FSC (Forest Stewardship Council)

flustix recognizes certificates issued by:

Forest Stewardship Council A.C.
Adenauerallee 134
53113 Bonn
Germany

provided that a valid Chain-of-Custody certificate is in place.

In particular, the following FSC evidence is assessed:

- FSC Recycled

- FSC Mix only with additional product-specific evidence of the recycled content physically present

An FSC Mix claim or percentage does not in itself demonstrate a particular physical recycled content. For recognition under this scheme, the actual share of recycled fibres and its attribution to the delivered material must be separately demonstrated by suitable production, transaction and delivery records.

6.5 Voluntary verification of geographical origin

The applicant may request verification of geographical origin. Before the audit, define the products or materials, period, quantities and supply-chain stages covered. Without this request, no additional general origin requirement arises; evidence required by law or for a specific claim remains mandatory.

A site record links waste collection, sorting, recycling stages and further processing, including incorporation of the recyclate, to the operator, activity, country, site address or clearly defined collection area, material, batch or period, corresponding quantity and evidence reference. The supplier or invoicing office and dispatch country do not replace the actual location of the activity.

Use existing delivery, weighing, transport, production and certification evidence; equivalently verified requirements do not require a full repeat audit. The certification body checks continuous traceability and quantity reconciliation, including mixtures, split quantities, yields and losses. Unknown origin or origin that cannot be separately evidenced remains identified as such and is excluded from confirmed country or site quantities. Subsequent sorting or processing does not demonstrate a previously unknown collection country.

For chemical recycling, Module A also applies. Physical PCR/PIR quantities and mass-balance-attributed PCR quantities remain separate. Origin attributes may be passed on only with the evidenced quantities and actual material deliveries; a site change or attribution does not create a new geographical origin.

On separate request, assess the French origin criteria under Articles 8 and 9 of the Arrêté of 5 September 2025 in the version applicable to the assessment period: collection, sorting, recycling and incorporation within 1,500 km of 46°29’38” N, 2°36’10” E and in the EU or a third country with demonstrated equivalent requirements under the Waste Framework Directive, Industrial Emissions Directive and applicable EU product legislation. Record site coordinates, geodesic distance method (straight-line distance) and result; distance is not cumulative transport mileage. Separately record the legal exception for untraceable initial collection and any permitted territorial variation with its legal basis; neither confirms an unknown collection country.

The audit report records scope, evidence, confirmed quantities and countries or sites, limitations and the independent assessment result. Changes to evidenced origin must be reported under Section 8.10.1 and reviewed at the next surveillance. Confirmation may appear on the certificate or an unambiguously linked supplementary statement. It is not a customs-origin determination and does not alone confirm full French premium eligibility or acceptance by an éco-organisme. Check that organisation’s current evidence and certification requirements separately before the intended use.

7 Audits (conformity check)

7.1 General information

The certification body uses auditors recognised by the body itself to conduct the required audits, which serve as the basis for the evaluation and certification of the products.

7.2 Definition of the process boundaries

The requirements of this certification scheme are verified within the defined process boundaries. The boundaries to be assessed depend on the origin and type of recycled material.

7.2.1 Utilisation of waste after use

As part of this certification scheme, the process to be considered for the required audit is defined as follows:

- The process to be considered begins at the point of the recycling process or the further processing of a recycled material
- All companies involved in the manufacturing process must be taken into account
- Traders must be mandatorily included when defining the process boundaries
    - Traders with physical storage are audited. The audit format is determined under Section 7.3.6
    - Traders without storage are included by means of document review, provided that complete traceability is ensured

- For food-contact products, the certification body additionally verifies whether the materials handled by supply-chain operators comply with the applicable requirements of Regulation (EU) 2022/1616, including authorisation of an individual recycling process where required. Apply the compliance route established under Section 5.2 and, where relevant, Module A Section 5.3; where the Article 1(3) exception in Regulation (EU) 2022/1616 is demonstrated, registration or authorisation evidence not applicable under that Regulation is not required
- If the packaging of a product (or vice versa) is not part of the certification scope, the packaging company is likewise excluded from the certification. This must be clearly indicated within the supply chain. Nevertheless, the transfer of certain information may still be required in specific cases
- Where recycled content changes regularly, the scheme owner sets the relevant evidence and adjustment rules, where appropriate in consultation with the certification body. On that basis, the certification body determines the assessment needed in the individual case. This may include internal records or an audit. Alternatively, the lowest demonstrated recycled content may be declared

7.2.2 Use of waste before use

As part of this certification scheme, the process to be considered for the required audit is defined as follows:

- The process to be assessed begins at the time where recycled material undergoes further processing

- All companies involved in the manufacturing process must be taken into account
- Traders with physical storage are audited; the audit format follows Section 7.3.6. Traders without physical storage are covered by document review, provided that complete traceability is demonstrated
- If the packaging of a product (or vice versa) is not part of the certification, the packaging company is also not included in the certification. This must be labelled accordingly in the supply chain. Nevertheless, it may be necessary to pass on information under certain circumstances
- Where recycled content changes regularly, the scheme owner sets the relevant evidence and adjustment rules, where appropriate in consultation with the certification body. On that basis, the certification body determines the assessment needed in the individual case. This may include internal records or an audit. Alternatively, the lowest demonstrated recycled content may be declared

7.3 Audit types

7.3.1 Initial audit

The audit format is determined under the risk-based principles in Section 7.3.6. The initial audit has the following objectives:

1. Determination of whether the calculation of the recycled content was carried out in accordance with the requirements of DIN EN ISO 14021, section 7.8
2. Check whether the traceability requirements for plastics in accordance with DIN EN 15343 (see Appendix A) are met
3. Determination of the proportion of waste before and after use in the recycled content
4. Where food-contact requirements apply, the assessment under Annex A 1.1 must take account of recognised existing compliance evidence

At initial certification, all manufacturers and processors within the defined process boundaries are included in the audit scope, unless the production sites have already been assessed. The audit format is determined under the risk-based principles in Section 7.3.6.

All relevant manufacturer, processor and recycler sites and their material flows remain in the certification scope and document review. Direct audits of sites not yet covered by current, recognised and equivalent evidence may be sampled. The minimum sample is √n, rounded up, where n is the number of those sites not equivalently covered. Document the covered sites, evidence and remaining gaps. If n = 0, no additional site audit is required solely to satisfy the formula; uncovered flustix requirements must still be assessed. Selection and format follow Section 7.3.6. Module A additionally requires its facility-level assessment under Section 8.1 and, where applicable, 8.2.

For the final decision on food-contact certification, the certification body also verifies the following, where applicable:

- Entry of the recycling plant in the Union Register
- Existence of a valid authorisation by the European Commission
- Compliance with process parameters and critical control points in accordance with the EFSA opinion

- Availability of a valid Declaration of Compliance (DoC) for all batches
- Performance of migration testing in accordance with Reg. (EU) 10/2011 and the relevant standards (e.g. EN 1186)

The audit may be conducted while a regulatory authorisation required for the intended food-contact use is still pending. The pending authorisation and any associated requirements that cannot yet be conclusively assessed shall be documented in the audit report. A certificate confirming food-contact suitability shall only be issued once the required authorisation has been submitted and all applicable requirements have been positively assessed. Following submission of the authorisation, the certification body may complete the procedure through a supplementary document review, provided that the previous audit findings remain current and reliable and no changes relevant to certification have occurred. A full repeat audit shall not be required solely because of the waiting period; additional verification shall be limited to the extent necessary.

The subsequent conformity assessment and certification decision are carried out under Section 8 of this scheme.

7.3.2 Monitoring audit

The annual surveillance audit has the following objectives:

1. Confirmation that the defined procedures are properly implemented and that the determination of the recycled content continues to comply with the requirements of the certification scheme
2. Determination of the proportion of waste before and after use in the recycled content

The annual surveillance audit covers relevant sites and material flows using current records. It directly covers at least one manufacturer, processor or recycler site unless current, recognised and equivalent evidence already covers the relevant scope. Justify and document selection, recognition and remaining gaps according to risk. For pure traders without their own manufacturing, processing or recycling, surveillance follows their actual role under Section 6.2 and Annex A 1.2; no additional upstream production-site audit is required solely to meet this minimum rule. Storage sites follow Section 7.3.6. Where applicable, the additional requirements of Module A Section 8 remain mandatory.

The subsequent conformity assessment and certification decision are carried out under Section 8 of this scheme.

If a required annual surveillance audit cannot be conducted within the scheduled surveillance period for scheduling or organisational reasons, it may take place within a grace period of no more than three months after the surveillance date. This requires scheduling to have begun before the end of the period, no indication of a material non-conformity, and documentation by the certification body of the conditions and date. The delay does not alter later surveillance dates or the expiry date stated on the certificate. The same window applies to completion of a renewal audit; an expired certificate is not automatically extended. Renewal and its effective date are decided separately under Section 8.8. This grace period does not extend statutory verification deadlines or evidence validity, particularly under Module A Section 8.2.

7.3.3 Supplementary audits

A supplementary audit is performed when additions, extensions or changes to the process or product (see Section 8.10.1) may affect determination of recycled content, including changes to participating manufacturers, processors or production sites within the defined process boundaries.

The scheme owner sets the rules governing the grounds, type and scope of supplementary audits, where appropriate in consultation with the certification body. The certification body determines and documents the specific audit and assessment activities necessary to evaluate the change.

7.3.4 Special audits (audits for special reasons)

A special audit is carried out under the following circumstances:

- If defects are detected
- After a production interruption of more than 12 months
- At the justified request of the scheme owner or the certification body
- Upon written request of third parties if they have a particular interest in ensuring proper market practice in terms of competition or quality

The scheme owner sets the rules governing the grounds, type and scope of special audits, where appropriate in consultation with the certification body. The certification body determines the specific audit and assessment activities according to the documented grounds.

If deficiencies are identified during a special audit or if it is carried out due to a production interruption , the certificate holder shall bear the costs of the special audit procedure.

If no defects are found during special inspections at the request of third parties, the costs shall be borne by the requesting third party.

7.3.5 Provisional initial certification

Production facilities that have less than twelve months of production data at the time of the initial audit may be granted provisional certification. In this case, at least three months of continuous production data with at least three manufactured batches must be available.

Once provisional certification has been granted, a supplementary audit with complete data must be carried out within the following nine months in order to confirm full certification. If production has not yet started, alternative evidence can be provided in consultation with the certification body, such as test batches, test runs or documented material receipts. Confirmation of product shares requires actual produced and assessed batches; forecast quantities or shares must not be certified. First attribution confirmation additionally requires the actual balancing data under Module A Section 8.1.

7.3.6 Selection of audit format

Audits may be conducted on site, remotely or in a hybrid format. The scheme owner sets the applicable rules, where appropriate in consultation with the certification body. The certification body then selects the format for each site according to the risks in this section and documents its reasons.

The format selection must consider, in particular, the complexity of the process and supply chain, earlier audit results, changes, digital evidence and traceability risks. A wholly remote audit is permissible only where material identity, inventory, process and material flows can be adequately verified from auditable records or suitable digital access. Otherwise, the affected process must be audited on site unless recognised equivalent evidence already addresses the assessment question. The format and rationale must be documented in the audit report. Mandatory on-site verification under Module A Section 8.2 is unaffected and cannot be replaced by a wholly remote audit.

7.4 Audit report

A flustix audit report shall be prepared for each audit conducted. The report serves to provide transparent and traceable documentation of the audit process and to assess compliance with the certification requirements.

The audit report shall include at least the following information:

- Identification of the audited company and the product
- Type and scope of the audit
- Applicable requirements and assessment criteria
- Key findings and verified evidence
- Evaluation of the level of conformity
- Any identified non-conformities and recommended corrective actions, if applicable
- Final assessment as the basis for the certification decision

The audit report shall be signed by the responsible auditor and submitted to the certification body for further evaluation.

Where Module A applies, the report additionally includes its Section 8.3 information. Use the linked Module A audit supplement or equivalent auditable records; duplicate documentation is not required. Document any statutory PET target evidence under Section 6.2 separately, identifying the legal basis, product scope, calculation and declarations reviewed.

8 Certification

Certification under this scheme comprises assessment of the system for determining product recycled content by the certification body on the basis of reports from its recognised auditors. The processes are assessed against all applicable requirements of this certification scheme and then continuously monitored. Where Module A applies, its additional requirements form part of this assessment.

For physical shares, issue of the corresponding certificate grants the right to use the flustix RECYCLED seal to confirm the claim assessed under DIN EN ISO 14021. Attributed PCR shares follow the specific certificate and communication rules in Module A Sections 9.1 and 9.2.

8.1 Application for certification

The application for certification shall be submitted by the company that first places the respective product on the market or markets it under its own responsibility.

The application shall be made in writing and must include all information required for the conformity assessment. This includes, in particular, information on the product, the type of recycled material used, the origin of the material, and the relevant process and supply chain.

Upon receipt of a complete application, the responsible certification body shall review the documentation for completeness and plausibility. If additional information or clarification is required, the applicant shall be notified.

Following a positive preliminary review, the certification procedure shall be initiated and the subsequent process, including the audit scope and timeline, shall be defined.

8.2 Classification of types and sub-types

Certificates are issued in relation to individual products. Products that differ from each other in key certification-relevant characteristics, such as recycled content, design, etc., are defined as types or models. Certification-relevant characteristics are determined by the manufacturing process, the materials used (including raw materials and supply chain) as well as the manufacturers, distributors and production sites.

The certificate must state whether suitability for a specifically defined food-contact use has been assessed and confirmed within its scope.

- Where food-contact use is within the scope, the certificate must specify the assessed use and contact conditions. The confirmation reads: “The suitability of the specified product for the stated food-contact use has been assessed against the applicable requirements of Regulations (EC) No 1935/2004, (EU) No 10/2011, (EU) 2022/1616 and (EC) No 2023/2006 in accordance with Annex A 1.1.”

- Where food-contact suitability is not confirmed within the certification scope, the certificate must state: “Suitability for food contact is outside the scope of this certification and is not confirmed by this certificate.” Where a required authorisation is pending, expressly defer the affected FCM scope. Separate confirmation of recycled content permits neither an FCM compliance claim nor placing on the market contrary to applicable law

For products consisting of a mixture of recycled and virgin material, differences in recycled content of more than 10 % absolute, if all other product characteristics are the same, are defined as separate types. This difference in the recycled content relates exclusively to the technical process and not to the general specification of the recycled content in the product.

Subtypes are generally products differing only in size, colour, form or other characteristics that do not change the assessed composition, material origin, traceability or verified recycled content. Such subtypes may be grouped on one certificate if their equivalence is documented in the audit report.

8.3 Conformity assessment and deviations

The certification body conducts a conformity assessment based on the application documents submitted. In particular, the audit report and, where applicable, test reports are used to assess whether the product complies with the requirements of this certification program and the relevant provisions of DIN EN ISO 14021, and, in the case of plastics, also DIN EN 15343 (see Annex A). When assessing

conformity with regard to the recycled content of plastics, the combination of standards DIN EN 15343:2008-02 and ISO 22095:2020-10 is primarily applied.

For each non-conformity, the certification body specifies and documents the corrective action, responsible party and reasonable deadline. The deadline must reflect the severity and certification relevance of the finding:

1. Major or critical non-conformities affect the applicant's ability to meet the requirements of the certification scheme. There is significant doubt that effective process control is in place or that the traceability of the recycled content of products cannot be demonstrated. Multiple minor non-conformities related to the same requirement or issue constitute a major non-conformity. Non-compliance with more than 50% of the category 2 requirements constitutes a major non-conformity Category 2 assessment follows the uniform counting and applicability rule in Section 5.3

    a) Serious breaches of Category 1 requirements suspend the certification procedure. The applicant is informed of the corrective actions to be completed within the period set by the certification body before the on-site audit, or where suitable a document or remote review, can resume. The certification body may discontinue the procedure if actions are not implemented satisfactorily. Major or critical non-conformities must be closed and verified before initial certification is granted or an existing certification continues without restriction
    b) Individual Category 2 deviations below the threshold for a major non-conformity are recorded as observations and corrected within a period set by the certification body. Corrective actions may be verified by document or remote review. The certification body decides whether they have been implemented correctly before closing the procedure

2. Minor or non-critical deviations do not limit the applicant's ability to meet the requirements of the certification scheme as a whole

    a) Minor deviations from category 1 requirements shall be documented and corrected within a time period specified by the certification body
    b) Minor deviations from category 2 requirements are noted as comments

Closure of a non-conformity requires documented evidence and verification by the certification body. Where justified by the finding’s severity, verification may use document review, remote review, a follow-up audit or the next scheduled audit. Major or critical findings remain subject to the closure requirements above.

8.4 Certificate and right to use the seal

Following a positive conformity assessment, the certification body issues a certificate granting the applicant the right to use the flustix RECYCLED seal within the confirmed scope. For physical shares, the seal carries its unique licence number and PCR, PIR or MIX designation; the percentage follows DIN EN ISO 14021, Clause 7.8. Use with the three-arrow symbol follows the design rules. Attributed shares additionally follow the specific information below and Module A.



Structure of the license number:	**RCDX000**
X:	**Placeholder for Certification body abbreviation**
Specify the type of recycled content:	**PCR, PIR or MIX**

For products with physically confirmed recycled content, state the confirmed percentage, corresponding licence number and PCR, PIR or MIX. The seal, licence number and origin designation may be used only for the certified product or expressly certified component and must match the assessed scope.

For attributed PCR, the certificate or clearly linked annex must identify Module A and its version, facilities, activities, reference item, evidence route and confirmed shares. An example claim is “XX% PCR attributed through mass balance from chemical recycling”. A bare percentage or unqualified PCR/MIX designation is insufficient. Physical and attributed shares remain distinguishable; specific mark use requires approval under Module A Section 9.2. A statutory purpose may be stated only after its conditions have been positively assessed.

One license number is issued per type. The same license number is issued for product variants (subtypes) of a type (see section 8.2).

In addition, the applicable General Terms and Conditions of the certification body must be observed.

8.5 Sub-Certificate

Upon application, a sub-certificate may be issued for a certified product if a company other than the main certificate holder places the product on the market or distributes it under its own responsibility, provided that the certification requirements continue to be fully met.

The sub-certificate shall clearly refer to the main certificate and shall apply only to products that correspond to the certified product type with regard to composition, verification of recycled content, and traceability.

The validity of the sub-certificate shall be limited to the validity period of the main certificate. If the main certificate expires, is suspended, or is withdrawn, the sub-certificate shall be affected accordingly.

A sub-certificate may also be issued to white-label manufacturers, fillers, or brand owners, provided that the certified product or certified component is used without modification and that no processing

step is carried out by the sub-certificate holder that affects the recycled content, material composition, or traceability.

This applies in particular to fully certified packaging used without any physical or material alteration. In such cases, the sub-certificate holder acts solely as the distributor placing a certified product on the market.

Downstream brand owners or private-label holders are entitled to apply for their own sub-license on the basis of a valid sub-certificate issued to the supplier, provided that the certified product or certified component is used without modification.

The right to use the flustix RECYCLED label and to make claims regarding the recycled content arises exclusively upon conclusion of a separate sub-license agreement. This is subject to the condition that the certified product or certified component remains unchanged and that any claim is clearly limited to the certified component.

8.6 Publications

All certificate holders can be called up on a monthly basis via the website of the certification body or the flustix website at flustix.com/certified/. Manufacturers, users and consumers use this search function to obtain information about certified products.

The database records the name of the certificate holder and the associated website address, including further contact information referring to the certificate holder. In addition, the technical data of the certified product can be accessed.

8.7 Validity of the certificate

The certificate shall be issued with a defined validity period of six years. The validity period is specified on the certificate and is subject to continued compliance with the requirements of this certification program, including surveillance. The six-year term does not extend required statutory verification certificates, authorisations or supplier evidence; where Module A applies, its Section 9.3 also applies.

Upon expiry of the validity period or termination of the certification, the right to use the label for the affected products shall cease.

8.8 Renewal of the certificate

To maintain certification beyond the stated period, submit a current positive audit report in good time. For direct audits of manufacturer, processor and recycler sites not equivalently covered, the minimum sample is $0.8 \times \sqrt{n}$, rounded up. Determine n and recognition of existing evidence under Section 7.3.1; if n = 0, no additional site audit is required solely because of the formula. Pure traders are assessed according to their actual role under Section 7.3.2. Audit format and additional module duties follow Section 7.3.6 and Module A Section 8 respectively.

Continued compliance with this certification scheme is demonstrated by an audit assessing whether the procedures, recycled-content determination and product labelling still meet the requirements. The audit is carried out under Section 7 of this scheme.

If the required renewal audit cannot be conducted before expiry despite scheduling having begun in time, it may be completed within no more than three months after the previous expiry date. The certification body documents the conditions and decides on renewal after completing the assessment. Until a positive decision, the grace period does not automatically extend the existing certificate or the right to use the seal.

8.9 Invalidation of the certificate

The certificate expires on the date stated on it unless renewed beforehand. It may also be suspended or withdrawn under the applicable certification rules where conditions for its maintenance cease to be met or material scheme requirements are not fulfilled.

Grounds for suspension or withdrawal may include:

- Failure to undergo surveillance or surveillance not properly conducted
- Misuse or unauthorized use of the label
- Failure to meet essential certification requirements
- Loss of the conditions on which the certificate was originally granted

On expiry, suspension or withdrawal, the right to use the flustix RECYCLED seal for affected products ceases for the corresponding period. Expiry or withdrawal normally requires a new certification procedure under Section 8.1. By exception, a renewal procedure initiated in time may be completed as a renewal within the maximum three-month catch-up window under Section 8.8. After expiry and until a positive decision, there is no certificate validity or right to use the seal; the renewed certificate must clearly state its effective date and new term. Statutory verification deadlines are unaffected.

8.10 Changes / additions

8.10.1 Changes / additions to the product

The certificate holder shall be obliged to notify the certification body without delay of any changes or modifications to the certified product that may potentially affect compliance with the certification requirements.

Such changes include, in particular, modifications to the materials used, the type or origin of the recycled material, production or processing methods, and the companies involved in the supply or process chain.

Upon receipt of the information, the certification body shall assess whether and to what extent the reported change requires a renewed evaluation. Depending on the nature and significance of the change, this may require the review of additional documentation, a supplementary assessment, or an additional audit.

Changes that do not affect compliance with the certification requirements shall be documented and shall not result in an amendment to the existing certificate.

The certificate holder may also apply for an extension of the existing certificate to cover additional variants (subtypes) of the same product type. The certification body shall determine whether and to

what extent additional evidence or supplementary evaluation is required. If the requirements are fulfilled, the variants shall be included in the certificate and shall be considered part of the certified product type.

If the evaluation determines that a change has a significant impact on the basis of certification, the certification body shall decide on the further course of action, including a possible amendment, suspension, or withdrawal of the certification. Certification may only be maintained after completion of the required assessment measures.

8.10.2 Change to the test basis

Where requirements, standards or other assessment bases relevant to this scheme change, the scheme owner assesses their effect on scheme requirements and sets the necessary transition rules, where appropriate in consultation with the certification body. The certification body independently assesses the effect on certificates it has issued.

The certificate holder shall be informed of relevant changes and of any resulting requirements necessary to maintain the certification.

The scheme owner sets generally applicable evidence and transition rules, where appropriate in consultation with the certification body. If maintaining an individual certification requires additional evidence, adjustments or assessments, the certification body determines their scope and a reasonable deadline for the certificate holder.

If the required measures are not completed within the specified timeframes, or if conformity cannot be demonstrated, the certification body shall decide on the further course of action, including the suspension or withdrawal of the certification.

8.11 Product defects

If indications arise that a certified product or the associated process or supply chain no longer complies with the requirements of this certification program, the certificate holder shall inform the certification body without delay and cooperate in the clarification of the matter.

The certification body shall assess the situation and may require appropriate evidence, corrective actions, and/or additional assessments. The nature and scope of such measures shall depend on the relevance of the non-conformity with regard to the verification of recycled content and traceability.

Until the matter has been resolved, the certification body may temporarily restrict or suspend the use of the label for the affected products.

If compliance with the requirements cannot be demonstrated within the time period specified by the certification body, or if a significant or repeated non-conformity is identified, the certification body shall decide on further measures, up to and including the withdrawal of the certification.

9 Self-monitoring by the manufacturer

The manufacturer must apply suitable quality-assurance measures and maintain a documented quality management system under Section 9.3 to ensure that the product properties confirmed by

certification remain satisfied. Factory production control (FPC) monitors product- and process-related requirements. Certification of the management system to DIN EN ISO 9001 is not required.

For products intended for food contact, the manufacturer shall additionally establish an internal quality assurance system in accordance with the principles of Good Manufacturing Practice as laid down in Regulation (EC) No. 2023/2006. This shall in particular include:

- Documentation and monitoring of the critical process parameters
- Evidence of testing required for the intended food-contact use, including migration testing under Regulation (EU) No 10/2011 where applicable
- Preparation and maintenance of a Declaration of Compliance for all relevant batches

9.1 Involvement of intermediaries

The manufacturer or certificate holder shall be obliged to document intermediaries within the framework of internal monitoring.

- Intermediaries with storage facilities must provide evidence of a valid certificate
- Intermediaries without storage facilities must ensure the complete transfer and archiving of supplier certificates and trade documents

For market participants who exclusively source certified products or components and place them on the market without modification, and who do not perform any processing steps that affect the recycled content or traceability, reduced requirements for internal monitoring shall apply.

However, such market participants are required to hold a valid sub-license for each use of the flustix RECYCLED label or for any claim regarding recycled content made in the market. The reduced internal monitoring requirements do not replace the licensing obligation and do not constitute an independent authorization to use the certification claim.

For food-contact products, intermediaries without storage must document how the evidence under Regulation (EU) 2022/1616 applies to the traded materials and their intended use. Authorisation of an individual recycling process must be evidenced where that process requires it. Apply the compliance route established under Section 5.2 and, where relevant, Module A Section 5.3; where the Article 1(3) exception in Regulation (EU) 2022/1616 is demonstrated, registration or authorisation evidence not applicable under that Regulation is not required.

9.2 Factory production control (FPC) / Quality assurance

Factory production control is a continuous process in which individual manufacturers monitor the production process to ensure that the manufactured products meet the specified requirements.

To this end, they shall keep records that must be presented to the certification body or its authorised representative upon request. These records must contain at least the following information:

- Designation of the product and, if a manufacturer carries out several steps in the manufacturing process, the designation of the process step under consideration

- The results of the review and, if applicable, a comparison with the specified requirements
- Signature of the person responsible for the audit
- Date of the recording

Depending on which process step is carried out, different documentation and tests are required. In the case of materials that are not made of plastic, specific requirements may apply, which must be determined on a case-by-case basis in consultation with the certification body and, if necessary, the auditor. Some of the required documentation and tests are listed here:

1. Requirements for the quality system
2. Evaluation of suppliers
3. Requirements for the input materials
4. Inventory management
5. Process documentation
6. Composition of the raw materials
7. Requirements for the starting products
8. Subcontracting

Specific requirements and checks may differ according to process and material. The scheme owner sets the applicable rules, where appropriate in consultation with the certification body; the certification body determines the necessary checks for the individual case.

At recycling and processing sites, significant environmental impacts of the certified process and compliance with applicable environmental permits and obligations must be assessed according to risk. Where relevant, this covers energy and water use, waste and residual materials, emissions and wastewater, and the permits and controls concerned. Existing regulatory documents, operational records or recognised environmental-management evidence may be used; separate ISO 14001 certification is not required. Findings and evidence reviewed must be documented in the audit report.

9.3 Requirements for the quality system

Requirement	Category Type	Minor deviation	Required proofs
9.3.1 Business registration It is necessary for the organisation to have a valid registration document. Furthermore, the top management of the organisation's location must be identified.	1	no	yes

Requirement	Category Type	Minor deviation	Required proofs
9.3.2 Quality management system A documented quality management system covering all activities relevant to the certified scope must be established, implemented and maintained. It defines responsibilities, applicable procedures, document control and internal checks needed to ensure compliance with flustix RECYCLED requirements. Third-party certification to ISO 9001, ISO 14001 or EMAS is not mandatory. Where such certification exists, it may be used as supporting evidence.	1	yes	yes
9.3.3 Education The personnel responsible for the inspection must be adequately trained to fulfil the inspection requirements. The training must ensure that the personnel are able to properly fulfil the tasks and responsibilities assigned to them. Contents of the training include: • Traceability requirements • Plausibility check • Documentation obligations • Process and material flows The training courses must be updated annually and attendance documented.	2	yes	yes
9.3.4 Register of complaints A complaints register is required and a process must be in place to ensure that any complaints arising in relation to the effective implementation of this certification are adequately addressed to enable improvements to be made.	2	yes	no

Requirement	Category Type	Minor deviation	Required proofs
9.3.5 Records – REACH compliance and product testing Retain written or digital records demonstrating assessment requirements and procedures for at least twelve months. Longer statutory or contractual periods remain applicable. Module A records have its five-year minimum retention period. Received supplier declarations for statutory PET target evidence under Section 6.2 must also be retained for at least five years, including for purely mechanical recycling. Available production-history requirements under Section 7.3.5 are separate from retention periods. Demonstrate suitable internal procedures for the substance and product requirements actually applicable, including Regulation (EC) No 1907/2006 (REACH) and its amendments. Recycled-content confirmation relies on origin, delivery, formulation, production and quantity records. Additional analyses or product testing are required only where arising from applicable law or the particular material and intended use being assessed. Suitable existing evidence may be used while it remains current and applicable; no blanket annual laboratory testing is required. Required test results must be made available to customers on request. Food-contact use follows Section 5.2 and Annex A 1.1.	1	yes	yes
9.3.6 Quality assurance Proof that quality control is in place for the compliant products.	2	yes	no
9.3.7 Communication about compliant products A surveillance audit must ensure that the monitoring, labelling, identification and marketing of compliant products is properly monitored and documented.	2	yes	no

Requirement	Category Type	Minor deviation	Required proofs
9.3.8 Social responsibility and occupational health and safety The organisation must comply with the labour, occupational health and safety, and social legislation applicable to its certified activities. Compliance is assessed according to risk using existing operational records, regulatory evidence, health-and-safety procedures or equivalent management evidence. An additional third-party social audit is required only where justified by specific risk factors. Recognised audits or certifications may be accepted as evidence.	1	yes	yes

9.4 Supplier evaluation

Requirement	Category Type	Minor deviation	Required proofs
9.4.1 Identification of suppliers The site should record the following information for each batch of recycled input supplied, as a minimum for each supplier with a valid supplier certificate: • Name and address of the supplier • Code and period of validity of the supplier certificate • A description of the recycled input provided • Documentation of the purchase of recycled input These records serve to ensure the traceability and documentation of the origin and consumption of recycled material.	1	yes	no

Requirement	Category Type	Minor deviation	Required proofs
9.4.2 Input data records The records and supplier certificate for recycled raw materials should be available throughout the material procurement process. The supplier's certificate and documentation should include a list of certified products that have the appropriate pre-consumer and post-consumer recycled content. This serves to ensure that the materials used in the production of certified products comply with the requirements of the certification scheme and are properly documented.	1	yes	yes

9.5 Input requirements

Requirement	Category Type	Minor deviation	Required proofs
9.5.1 Purchase specification Batches of certified recycled raw materials are purchased and processed according to a specification. This specification must be available for each accepted type of certified recycled raw material and must contain at least the following information: • Material type (e.g. polymer type) • Product code (unique identification for each certified recycled raw material purchased) • Volume • Recycled content according to the supplier certificate This information is important to ensure that the recycled raw materials used meet the requirements of the certification scheme and are properly documented.	1	yes	yes

Requirement	Category Type	Minor deviation	Required proofs
9.5.2 Recorded weights and dates of delivery To document weights and delivery dates, evidence and receipts are required to record the weight (at least from freight documents or, for example, big bag overviews), the product code and the delivery date of all incoming batches of recycled input. Existing weighbridge receipts must be recorded either by the supplier and/or the organisation and stored in physical or digital form.	1	yes	yes
9.5.3 Origin, source, sector and type of recycled input The origin of the material, whether pre- or post-consumer, must be traceable through documents and certification from the supplier. If available, the material source (such as household, commercial, industrial, etc.), the material sector (e.g. packaging, construction, WEEE, agriculture) and the specific product application (such as PET bottles, trays, etc.) must be supported by appropriate documents and supplier certificates. All of this information must be documented.	1	yes	yes

9.6 Inventory management

Requirement	Category Type	Minor deviation	Required proofs
9.6.1 Identification of stocks All incoming recycled inputs must have a product code that clearly links them to the supplier. For example, big bags can be labelled, assigned to specific storage locations or subject to unique batch assignments. Big bags can be stored with either the original product code or an internal electronic re-coding.	1	no	yes
9.6.2 Storage conditions Products and materials must be stored in enclosed or, at minimum covered facilities.	2	yes	no

Requirement	Category Type	Minor deviation	Required proofs
9.6.3 Inventory management system A system must be in place to record all incoming and outgoing recycled input and output as well as the stock levels on site. The warehouse management system must also take into account, for example, regrind or intermediate steps that are reintegrated into the production process. The inventory is reconciled annually. Documentation must be available for this purpose. The organisation is obliged to prepare a summary that lists the remaining stock from the previous year, the preliminary products received, the preliminary products and products still in stock and the products sold.	1	no	yes
9.6.4 Inventory controls A physical stock check must be carried out and documented at least once a year to ensure that the stock specified in the stock management system is correct. These checks must be recorded and documented.	1	no	yes

9.7 Process

Requirement	Category Type	Minor deviation	Required proofs
9.7.1 Overview of the process A process description and an accompanying flow diagram are available and can be provided.	1	yes	yes
9.7.2 Incoming utilised input data records Documentation for the recycled input must be available. If different recycled material streams are processed, separate records must be maintained for each individual stream.	1	yes	yes

Requirement	Category Type	Minor deviation	Required proofs
9.7.3 Physical identification of material flows Processing facilities must ensure that the certified recycled materials are fed through clearly documented and identified conveying routes (e.g. silos, conveying lines, pipe systems, mixing stations). Interfaces to other materials must be controlled in such a way that cross-contamination is prevented. All connections, material flows and control systems must be documented and made available for audit purposes.	1	yes	yes
9.7.4 Input records for contract processing Documentation on recycled inputs passed to subcontractors for processing must be available. The corresponding requirements are defined in Section 9.10.	1	yes	yes
9.7.5 Utilisation of internal returns (in-process side streams) Production residues (such as sprues, rejects or start-up material) arising within the same manufacturing process and returned to that process are recorded as internal returns. They do not create a new or additional PIR share. Recycled content from the original certified input is retained only where the following conditions are met and quantities are reconciled without double counting: • The original input contained certified recycled content • Traceability is fully batch-related and documented • Volume comparisons document the balance between input, recirculation and output	1	yes	yes

Requirement	Category Type	Minor deviation	Required proofs
9.7.6 Input and output records Documentation must be prepared for all materials that are introduced into the process and produced through the process. This includes: • Recycled input used • Additives, masterbatches and untreated materials • Scrap or regrind that is fed into the process • Products produced and leaving the certified process • Rejected products	1	yes	yes
9.7.7 Process documents Documentation must be created that shows the times at which the production process was active on a specific day, the quantities of recycled input used and the output generated. These records should be available for a period of at least 12 months (i.e. during the evaluation period). If this is not the case, the issuance of a provisional certificate is recommended.	1	no	yes
9.7.8 Metrological testing of the test equipment Methods and measures for selecting, monitoring and calibrating test equipment must be applied regularly if such equipment is available. Any deviations must be documented. The corrective measures taken must include both an investigation of the reasons for the deviations and steps to prevent such deviations in the future.	1	yes	yes

Requirement	Category Type	Minor deviation	Required proofs
9.7.9 Volume reconciliation An overview of the material flows of the process in which recycled input is used to produce an output within a specified time period is required. Minor deviations should be explained. The output can be specified either in tonnes (t) or by number of products. If the output has been produced for less than one year or the documentation has been kept for less than one year, it is recommended to issue a provisional certification. In the case of production on demand (spot production), the plausibility check and control of the recipes must be carried out on the basis of the consumption data. Quantity reconciliation follows the ISO 22095:2020 chain-of-custody model applicable to the evidence route. Physically known shares follow the controlled-blending principles in Section 6.3; mass balance attribution additionally follows Module A Sections 6 and 7. This includes comparing input, process returns and output for the respective defined observation periods.	1	yes	yes
9.7.10 Traceability Appropriate measures must ensure traceability throughout the process in accordance with DIN EN 15343:2008-02 and the applicable chain-of-custody principles of ISO 22095:2020. Batches of recycled input and output must be traceable at every relevant point and location within the process. This includes: • Report on the incoming cargo • Incoming warehouse • Process (including production documentation, machine settings and traceability in relation to the injection moulding machines, where relevant) • Comparison of the total input of certified recycled material with the corresponding production output	1	no	yes

Requirement	Category Type	Minor deviation	Required proofs
• Documentation of all quantities of virgin material, additives, masterbatches and auxiliary materials supplied • Consideration of losses, production waste and temporary storage • Annual reconciliation of opening stock, goods receipts, stock levels and sales figures • Plausibility checks as a mandatory part of the audit Plausibility checks of physical shares take account of DIN EN 15343:2008-02, Annex A, and the applicable controlled-blending principles of ISO 22095. Attributed quantities additionally require review of evidence status, delivery transfers and facility-level accounts under Module A Sections 6 and 7; processing does not turn an attributed share into physically evidenced recycled content. The documented material flows, stock levels and interim consumption are reconciled in a traceable manner.			

9.8 Composition of the products leaving the certified process

The composition of the certified products must be documented in detail.

In particular, the following must be documented:

- Polymer base
- Percentage of recyclate (separated by PCR / PIR)
- Use of additives, masterbatches, fillers
- Weight proportions of all components

In the case of multi-layer products, all layers must be included in the mass balance.

Requirement	Category Type	Minor deviation	Required proofs
9.8.1 Output specifications Specifications of the output in the sense of product descriptions (bills of materials) of the produced output must be available, including details such as polymer, colour, unit weight, product components and so on.	1	no	yes
9.8.2 Output description Description of the output by presenting the products, product groups or components that are taken into account within the scope of certification.	1	yes	yes
9.8.3 Calculation of the recycled content Recycled content is calculated as a mass fraction of the entire certified reference item. If a whole product is certified, the denominator includes its full mass, including non-recycled components, layers, additives, masterbatches and fillers. If only a component is expressly certified, its full mass is the denominator. PCR and PIR are reported separately; only demonstrably eligible quantities enter the numerator. The composition below describes physical shares. Where Module A applies, calculate eligible attributed PCR and any qualified combined figure additionally under its Section 7.6. Physical material composition and the attribution account remain separate; the same quantity must not also be counted as physically contained or attributed to another independent output. Certified reference item 100% = • (Proportion of recycled content - pre-consumer) X % • (Proportion of recycled content - post-consumer) X % • (Other components such as virgin material, masterbatch, colourants, fillers, etc.) X % All constituents of the certified reference item must be included. Proportionate credit for recycled material in	1	no	yes

Requirement	Category Type	Minor deviation	Required proofs
a supplied mixture requires evidence of its PCR/PIR share and attribution to the quantities actually used. Internal returns must not increase the counted recycled quantity. The calculation reflects the actual percentage of recycled content (both pre-and a post-consumption). The products or product groups are listed in the audit report and in the overview document with their respective percentage values.			
9.8.4 Plausibility check For the defined assessment period, opening stock and receipts of all relevant materials must be plausibly reconciled with internal returns, losses, closing stock and finished output. The following must be checked against formulations and verifiable quantity records: 1. Proportions in accordance with the product formulation 2. Verification of the purchased quantity of recycled input used 3. Control of the manufactured output 4. Opening stock + receipts − closing stock = documented consumption; compare consumption with production, rejects and losses For Module A, additionally reconcile the attribution account with actual deliveries and product shares. Statutory target calculations use their own required reference mass and eligibility conditions	1	no	yes

9.9 Output requirements

Requirement	Category Type	Minor deviation	Required proofs
9.9.1 Output specifications The sales invoices for the output must contain at least the following information: • Name and address of the buyer • Date of invoicing • Product code and description of the sold output • Quantity of output	1	no	yes
9.9.2 Records of sales Documentation on the sales of the output must be available. Procedures for monitoring and controlling the determination of output must also be implemented.	1	no	yes

9.10 Subcontracting

If processing steps are outsourced to subcontractors, these subcontractors must be verifiably integrated into the quality assurance system.

The same documentation, traceability and plausibility requirements apply to all process stages outsourced to subcontractors.

The documentation of input and output quantities and the recycled materials used must also be fully traceable at the subcontractor level and made available for audit purposes.

Requirement	Category Type	Minor deviation	Required proofs
9.10.1 Control of processing by subcontractors The documentation must clearly show when recycled input was transferred to subcontractors for processing. At least the following details must be recorded: 1. The date on which the recycled input was handed over to the subcontractor for processing 2. The name and address of the subcontractor performing the processing 3. The quality and quantity of recycled input transferred to the subcontractor for processing	1	no	yes
9.10.2 Certification of the subcontractor Processing carried out by subcontractors must take place in certified facilities. Copies of the respective subcontractor's certificates must be enclosed. Processing operations in non-certified companies are excluded from the calculation of the recycled content.	1	no	yes
9.10.3 Social Responsibility / Corporate Social Responsibility Subcontractors remain subject to the applicable requirements under Section 9.3.8.	1	yes	yes

10 External monitoring by the certification body

External surveillance takes the form of an audit under Section 7.3.1 for initial certification, Section 7.3.2 for periodic surveillance and Section 8.8 for certificate renewal.

Where surveillance audits show that further sites or material flows need to be checked, additional records may be requested or supplementary audits conducted to confirm traceability and recycled content.

The certification body carries out regular surveillance audits to ensure that the product complies with the standards specified in the certification scheme. The costs incurred by these tests are invoiced to the certificate holder after the surveillance measures have been completed.

10.1 General information

A central element of the certification is the continuous monitoring of the system throughout the entire validity period of the certificate. This monitoring takes place at annual intervals. The certification body uses surveillance audits to check and evaluate whether the requirements of this certification scheme are being followed accordingly.

10.2 Audits

During an on-site audit, the certification body or its appointed third party checks the company's internal processes against the applicable standard and this scheme and verifies the accuracy of stated recycled content. A remote audit is permissible only as provided by the risk-based rules in Section 7.3.6. An audit report is prepared for each audit.

If an audit result is unsatisfactory, the certificate holder and, where relevant, the affected manufacturer must promptly be informed of the findings, required corrective actions and a reasonable documented deadline. The effectiveness of the actions is verified under Section 8.3. If material requirements remain unmet at the deadline, the following consequences apply:

- At initial certification, the procedure is suspended until effective corrective actions have been demonstrated, or discontinued if a material non-conformity persists
- At surveillance audits, the certificate may be suspended following documented assessment and withdrawn if a material non-conformity remains unresolved
- At renewal audits, renewal is not granted until material non-conformities have been closed and verified

If production of the product is interrupted and this makes contractually agreed monitoring of the entire process impossible, the certification body must be informed immediately, stating the expected duration. The same applies to the resumption of production.

The manufacturer must appoint a responsible expert and nominate them to the certification body. The same applies to the deputy. Any change in this position must be reported to the certification body immediately in writing.

Representatives of the certification body shall have the right to enter the manufacturer's premises and storage facilities, including their distribution centres, at any time during working hours without prior notice and to take all measures necessary for surveillance. In addition, the representatives of the certification body must be able to inspect all product-relevant documents if required. This must be ensured by the applicant / certificate holder.

Appendix A Requirements for plastics

All documentation from the manufacturers / processors involved in the process must comply with the traceability requirements in accordance with DIN EN 15343 for plastics recycling. In particular, they must contain the necessary information in accordance with DIN EN 15343 Table 1 and DIN EN 15347 Table 1.

The documentation should be structured in a way that allows verification without requiring access to confidential business documents.

A 1 Product properties for plastics, metal, paper and paperboard, and glass

Certified products and materials must comply with the applicable substance, product and waste legislation. The following provisions are considered only where relevant to the material, manufacturing process and intended use:

- Regulation (EC) No. 1935/2004 on materials and articles intended to come into contact with food
- Regulation (EC) No 1907/2006 (REACH)
- Regulation (EC) No 1272/2008 (CLP Regulation)
- TRGS 905 (Technical Rules for Hazardous Substances 905)
- TRGS 614 (Technical Rules for Hazardous Substances 614)
- Commission Delegated Directive (EU) 2018/740 (concerning aluminium)
- Commission Delegated Directive (EU) 2018/739 (concerning steel)
- Regulation (EC) No 333/2011 (concerning scrap metal)

A signed manufacturer self-declaration may provide initial evidence. It does not replace testing, authorisations and Declarations of Compliance required by applicable law, or the assessment of traceability and recycled content under this scheme. Food-contact applications are additionally subject to Section 5.2 and Annex A 1.1.

A 1.1 Additional requirements and compliance pathways for food-contact materials and products

Products, semi-finished products or materials that are explicitly intended for food contact applications or marketed with food contact related compliance claims shall fulfil additional requirements. The purpose of these additional requirements is to ensure regulatory compliance while avoiding unnecessary duplication of testing and assessment where valid third-party evidence already exists. For chemically recycled materials, additionally determine the applicable compliance route under Module A Section 5.3. Traceability, recycled content and mass balance alone do not confirm food-contact suitability.

Recognition of existing compliance evidence

For the purpose of market harmonisation and to reduce unnecessary administrative burdens, flustix recognises existing valid compliance evidence, provided that such evidence is:

- current
- product-specific

- applicable to the identical material
- based on the same production process
- aligned with the intended use

Accepted evidence includes in particular:

- Declarations of Compliance (DoC) according to Regulation (EU) No. 10/2011
- Good Manufacturing Practice (GMP) documentation according to Regulation (EC) No. 2023/2006
- Migration test reports issued by accredited laboratories
- Authorisations under Regulation (EU) No. 2022/1616
- Existing challenge tests
- Decontamination validation reports
- EFSA opinions
- Equivalent recognised certification programmes or food contact modules

Where such evidence is available and valid, it may be recognised during the audit process. Recognition avoids only checks actually covered by equivalent evidence. Minimum checks and remaining gaps must still be assessed. A traceability certificate, supplier statement or EFSA opinion alone does not replace legally required testing, a Declaration of Compliance, registration or authorisation.

Minimum audit verification requirements

Irrespective of recognised evidence, the audit or technical review team must at least verify the following:

- material identity (polymer type, PCR/PIR, material type)
- intended use
- type of food contact
- temperature and contact conditions
- traceability of recycled inputs
- plausibility of material flows
- consistency between evidence, material, process and intended end-use

Traceability shall be based on the requirements of EN 15343 and ISO 22095.

Additional evidence where no recognised evidence exists

Where no recognised or valid evidence exists, additional supporting evidence shall be required.

Depending on the applicable legal framework and intended use, this may include:

- migration testing
- challenge tests
- decontamination validation
- supplementary supplier declarations

The extent of the required evidence shall be determined based on product risk and intended application.

Conditions for confirming food-contact suitability

Suitability for a precisely defined food-contact use may be confirmed within a flustix RECYCLED certificate only where the following conditions are supported by applicable product-specific evidence and assessed in the audit report:

- traceability has been fully demonstrated
- existing evidence is valid and applicable
- intended product use is clearly defined
- No unresolved major or critical non-conformities affect the food-contact scope

For audits conducted while a required regulatory authorisation is pending, and for the subsequent certification decision, the procedure in Section 7.3.1 applies.

A 1.2 Requirements for intermediaries

Intermediaries taking ownership of the material shall mandatorily be included in the traceability system.

- Intermediaries with physical storage (e.g. transhipment, interim storage, repackaging) are subject to the full certification requirements and shall be verified by means of an audit
- Intermediaries without physical storage (brokers, trading-only entities) are covered through a document review, provided they exclusively trade in certified material and fully forward the required supplier certificates
- For food-contact materials and products, intermediaries must demonstrate that the requirements of Regulation (EU) 2022/1616 applicable to the traded inputs are met. Authorisation of an individual recycling process must be evidenced where required for that process. Intermediaries with physical storage are subject to the full certification requirements; those without storage must document and pass on material identity and complete compliance and delivery records. Apply the compliance route established under Section 5.2 and, where relevant, Module A Section 5.3; where the Article 1(3) exception in Regulation (EU) 2022/1616 is demonstrated, registration or authorisation evidence not applicable under that Regulation is not required