



# **REGULATION FOR THE CERTIFICATION OF RECYCLED/RECOVERED/BY-PRODUCT MATERIAL CONTENT**

## **CPDOC262**

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# 1. GENERAL INFORMATION

## 1.1. Scope and field of application

This Regulation defines the methods and procedures to manage the technical and organisational system for issuing and maintaining a Product Certificate and a Product Conformity Mark.

The purpose of this voluntary certification plan is certification that the contents of the recycled and/or recovered and/or by-product material in construction products complies with the values declared by the manufacturer.

For products, performance aspects are not taken into account, nor are their suitability for use and conformity with legislation on hazardous substances and any other information required by relevant national legislation. These aspects are and remain the sole responsibility of the manufacturer.

The certification plan adopted complies with schemes 1b and 3 described in ISO/IEC 17067.

In particular, the certification plan includes the following steps:

- determination of the characteristics to be certified (recycled/recovered/by-product content);
- initial factory inspection and testing of the method for calculating the recycled and/or recovered and/or by-product content;
- testing the accuracy of the recycled and/or recovered and/or by-product content calculations;
- testing production monitoring with regard to the characteristic to be certified (on a sample basis);
- file review (audit report);
- decision on certification;
- issuing the conformity certificate for the recycled and/or recovered and/or by-product content of all the products subject to certification, or of a batch of such products;
- right to use the conformity mark;
- periodic oversight of the factory production monitoring of the recycled and/or recovered and/or by-product content;
- periodic monitoring that the method for calculating the recycled and/or recovered and/or by-product content of the products subject to certification is applied correctly.

The certification plan is called 'CPDOC262'.

To adapt the plan to the needs and technical and scientific developments on which the assessment model is based, it is reviewed every 3 years or when market input is provided. Specific reports from users are collected, and the plan manager will assess their substantiality.

In this document, organisation means:

- a legal entity that performs a production activity;
- a well-established operating facility where the activities are carried out.

The certification activity must be carried out by bodies that operate as Product Certification Bodies in compliance with UNI CEI EN ISO/IEC Standard 17065, and they must be specifically accredited.

## 1.2. Regulatory references

- The activities covered by this regulation refer to the current version of the following documents:
- Legislative Decree (D. Lgs.) no. 152 of 3 April 2006, as amended;
- UNI EN ISO 14021, 'Environmental labels and declarations - self declared environmental claims (type II environmental labelling)';
- ISO IEC 17067, 'Conformity assessment – Fundamentals of product certification';
- UNI EN ISO 9001, 'Quality Management Systems';
- UNI EN ISO 14001, 'Environmental Management Systems';

- UNI EN ISO 14020, 'Environmental labels and declarations - General principles';
- UNI EN ISO 19011, 'Guidelines for auditing quality and/or environmental management systems';
- EN 13369, 'Common rules for precast concrete products';
- UNI CEI EN ISO/IEC 17065, 'Requirements for bodies certifying products, processes and services';
- Decree no. 264 of 13 October 2016 by the Italian Ministry for the Environment, Land and Sea Protection, 'Regulation containing target criteria to facilitate demonstrating the existence of requirements for qualifying production residue as a by-product and not as waste';
- Italian Presidential Decree no. 120 of 13 June 2017, 'Regulation on simplified rules for handling excavated earth and rocks, pursuant to Art. 8 of Decree-Law No. 133 of 12 September 2014, converted, with amendments, by Law no. 164 of 11 November 2014'.

### 1.3. Terms and definitions

All terminology and product requirements covered by this regulation use the following definitions:

Corrective Actions	all actions to be taken by the organisation to eliminate the non-conformities detected by the Certification Body
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Product Certificate	the document issued to the client by ICMQ certifying the recycled/recovered/by-product content to clarify the mass balance
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Termination of waste status Legislative Lgs. 152/2006, Art. 184-ter(1)	waste ceases to be waste when it has undergone a recovery operation, including recycling and preparation for re-use, and when it satisfies the specific criteria to be met under specific conditions
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NOTE 1: Waste that ceases to be waste within the meaning and effects of the definition above shall be counted when calculating the achievement of the recovery and recycling targets set out in D. Lgs. 152/2006 and supplementary decrees, as well as the acts transposing further EU legislation, if and on condition that the recycling or recovery requirements set out therein are met.

The rules on waste management shall apply until the termination of waste status [D. Lgs. 152/2006, Art. 184-ter(1, 4 and 5)]

NOTE 2: to assess termination of waste status, consider the definitions in the specific annexes of the EoW European Regulations (e.g. EU Regulation 715/2013, EU Regulation 333/2011, EU Regulation 1179/2012, etc.) and other domestic legal provisions.

Client	<p>a set of individuals and resources with established responsibilities, authorities and interrelations</p> <p>This term indicates the economic operator applying to the Certification Body for certification.</p>
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Certification Committee	a set of individuals who decide on whether to issue, maintain, suspend or revoke the certificate
Recovered content	<p>the proportion, by mass, of recovered material present in a finished product</p> <p><u>NOTE 1:</u> The proportion must be established based on the mass of the finished product.</p> <p><u>NOTE 2:</u> If the value of the recovered content varies, one can declare the minimum recovered content.</p>
Recycled content [UNI EN ISO 14021, 7.8.1.1 a]	<p>the proportion, by mass, of recycled material in a product or packaging. Only 'pre-consumer' and 'post-consumer' materials can be considered recycled content, consistent with the use of the following terms.</p> <p><u>NOTE 1:</u> The proportion must be established based on the mass of the finished product.</p> <p><u>NOTE 2:</u> if the value of the recycled content varies, consistent with section 7.8.3.3 of UNI EN ISO Standard 14021, one can declare the minimum content of recycled material.</p>
By-product content	<p>the proportion, by mass, of by-product present in a finished product</p> <p><u>NOTE 1:</u> the proportion must be established based on the mass of the finished product.</p> <p><u>NOTE 2:</u> If the value of the by-product content varies, one can declare the minimum by-product content.</p>
Manufacturer's declaration	the organisation's declaration, which defines the application scope of the certification and uniquely identifies the products subject to certification with their recycled/recovered/by-product content
Audit Team/Auditors	the persons appointed by the Certification Body to carry out the audit to certify the recycled and/or recovered and/or by-product content.
Checklist	the document prepared by ICMQ and used by the Auditors to collect the evidence necessary to verify the recycled and/or

recovered and/or by-product content

Recovered material

[UNI EN ISO 14021, 7.8.1.1 c]

the material that would otherwise have been disposed of as waste or used for energy recovery, which has instead been collected and recovered as a supply material to replace a new material for a recycling or production process

NOTE 1: The recovered material results from a waste recovery operation authorised pursuant to Arts. 208, 216 and Part II of D. Lgs. no. 152/06, and carried out in accordance with Annex C Part IV of D. Lgs. no. 152/2006 and similar EU legislation (Directive 2008/98/EC, as amended by (EU) Directive 2018/851).

NOTE 2: please note that a recovered material differs from a recycled material in that the latter is also subject to a 'recycling process' in addition to recovery. Therefore:

- when a recovered material directly enters a manufacturing process without having previously undergone a specific 'recycling process', it must be taken into account when calculating the content of recovered material.
- when a recovered material directly enters a manufacturing process, which initially also includes a 'recycling process', without this being clearly separate from the manufacturing process, the material is to be considered for all intents and purposes as recycled material and, therefore, it contributes to the calculation of the content of recycled material (consistent with UNI EN ISO 14021 ANNEX A).

NOTE 3: as stated in Note 2 of the definition of UNI EN ISO 14021, 'the terms "recovered material" and "reclaimed material" are treated as synonyms; however, we recognise that in some countries one or the other of these terms may be preferred for this application'. This is why this regulation only refers to the term 'recovered material'.

NOTE 4: please note when applying this regulation, and consistent with the definition of waste, a organisation's production residue that is reused in the production process for the product being verified does not qualify as a recovered material, but only as a by-product, if it meets all four conditions of its definition.

Recycled material

a material that has been reprocessed from material recovered by a manufacturing process and transformed into an end product or into a component to be incorporated into a product

NOTE: secondary raw materials and materials derived from the End of Waste process are recycled materials.



Post-consumer material [UNI EN ISO 14021, 7.8.1.1 a2]	<p>a material generated by residential establishments or by commercial, industrial or institutional installations in their role as the end user of a product that can no longer be used for its intended purposes. This includes material returned from the distribution chain.</p> <p><u>NOTE:</u> only a recycled material can be considered 'post-consumer' due to the origin of the waste from which it comes.</p>
Pre-consumer material [UNI EN ISO 14021, 7.8.1.1 a1]	<p>a material extracted from the waste stream during a manufacturing process. This not does include the re-use of reprocessed or reground materials, or residues generated in a process that can be recovered in the same process that generated them.</p> <p><u>NOTE 1:</u> please note that only a recycled material as defined in section 3.6 may also be classified as 'pre-consumer' due to the origin of the waste from which it comes.</p> <p><u>NOTE 2:</u> this category also includes excavated earth and rocks qualified as waste.</p>
Non-conformities	<p>the failure to meet and/or the inadequate application of an applicable requirement in the reference documents whose extent, systematic nature, intensity, criticality and/or influence jeopardise the accuracy, completeness and/or clarity of the information prepared by the organisation</p>
Economic operator	<p>the manufacturer, the authorised representative, the importer or distributor, the logistics service provider or any other natural or legal person subject to obligations related to the manufacture of products, their sale or their operation in accordance with the relevant EU harmonisation legislation ([EU] Regulation 2019/1020 of the European Parliament and Council of 20 June 2019]</p>
Accreditation body	<p>a body that examines and monitors the competence requirements of Certification Bodies with respect to ISO IEC 17067</p>
Manufacturing process	<p>a set of related or interacting activities aimed at the manufacture of a given product</p>
Product [UNI CEI EN ISO/IEC 17065: 2012, Requirements for bodies certifying products, processes and services]	<p>the result of a manufacturing process</p>

**Recovery**

D. Lgs. 152/2006, Art. 183(t)

any operation whose main result allows waste to play a useful role by replacing other materials that would otherwise have been used to fulfil a particular function or to prepare them for that function, either within the plant or in the economy at large. A non-exhaustive list of recovery operations is set out in annex C of part IV of this decree.

Production residue (hereinafter also 'residue')

[Decree no. 264 of 13 October 2016, Art. 2(b)]

any material or substance that is not deliberately produced in a production process and that may or may not be waste

**Recycling**

D. Lgs. 152/2006, Art. 183(u)]

any recovery operation treating waste in order to obtain products, materials or substances to be used for their original function or for other purposes. This includes processing organic material, but not energy recovery, nor reprocessing to obtain materials to be used as fuel or in filling operations.

**Waste**

D. Lgs. 152/2006, Art. 183(1)(a)]

any substance or object that the holder discards or intends or is required to discard

Recovery site

a plant where the waste recovery process occurs

Oversight

the activity through which the Certification Body periodically verifies continued compliance with the requirements established by this regulation

**By-product**

D. Lgs. 152/2006, Art. 184(a)(1)]

a by-product that is not waste; any substance or object that fulfils all of the following conditions:

- a. the substance or object derives from a production process of which it is an integral part, the main aim of which is not the production of such a substance or object;
- b. it is certain that the substance or the object will be used by either the manufacturer or a third party during the same or a subsequent production process or use;
- c. the substance or object can be used directly without any further processing other than normal industrial practice;
- d. its further use is lawful, i.e. the substance or object meets all relevant product, environmental and health protection requirements for its specific use, and it will not lead to overall adverse impacts on the environment or human health

NOTE 1: for more information on the conditions for qualification as a by-product, consider the provisions of Decree no. 264 of 13 October 2016 by the Italian Ministry for the Environment, Land

and Sea Protection, 'Regulation containing target criteria to facilitate demonstrating the existence of requirements for qualifying production residue as a by-product and not as waste'.

NOTE 2: to qualify excavated soil and rocks as a by-product, consider the provisions of Presidential Decree no. 120 of 13 June 2017, Art. 2(1)(o): operations, even if not carried out individually, to which excavated earth and rocks may be subjected for the purpose of improving their commercial characteristics to make their use more productive and technically efficient, constitute a normal industrial treatment practice. Without prejudice to conformity with the requirements for by-products and environmental quality, normal industrial practice guarantees the use of excavated earth and rock in accordance with the technical criteria established by the project. Annex 3 lists some of the most commonly performed operations that fall under normal industrial practice.

**Excavated earth and rocks**  
[Italian Presidential Decree no. 120 of 13 June 2017, Art. 2(1)(c)]

the excavated soil resulting from activities aimed at performing a job, including: excavations in general (excavations, foundations, trenches); drilling, piling, consolidation; infrastructure works (tunnels, roads); and removing and levelling earthworks. Excavated earth and rock may also contain the following materials: concrete, bentonite, polyvinyl chloride (PVC), fibreglass, cement mixtures and additives for mechanised excavation, provided that the earth and rock containing these materials do not contain concentrations of pollutants exceeding the limits set out in columns A and B, Table 1, Annex 5, in Title V of Part IV of D. Lgs. no. 152 of 3 April 2006 for its specific use.

The use of excavated earth in industrial processes as a by-product in place of quarry materials is permitted in conformity with the conditions set out in Art. 184a and Italian Presidential Decree no. 120/2017, Art. 4(2).

NOTE: for the classification of excavated soil and rocks as by-products or waste, see Presidential Decree no. 120 of 13 June 2017, which regulates the management of excavated earth and rocks as by-products or waste and their exclusion from the waste system.

**Solid state**

[Treccani Vocabulary, website 'treccani.it', October 2022]

a special state of aggregation of matter featuring a considerable amount of cohesive force between the particles, so all of them are bound to neighbouring particles by much stronger bonds than in their liquid or gaseous state.

A body in a solid state is also called a solid body or a solid. Due to their lack of flexibility, solids, unlike liquids and gases, have a noticeably unchanging shape and volume, at least when not under intense stress.

**Production unit**

a place where activities are performed related to the manufacture of products subject to Product Certification requirements

NOTE: a production unit is defined as any facility where the manufacturing process takes place.

Assessment

an action the Certification Body takes to ascertain how the organisation operates, ensuring the truthfulness of its declarations about recycled and/or recovered and/or by-product content

## 2. THE ORGANISATION'S RESPONSIBILITIES

### 2.1. Legal conformity

A precondition for obtaining certification is that the organisation complies with the applicable legislation for the product being certified.

If the organisation carries out a waste recovery operation, it must have a valid permit issued by the competent authority.

The verification of the correct qualification of the materials constituting the product subject to certification as waste, by-product, end-of-waste or recovered material is subject to monitoring by the competent institutional bodies and is outside the scope of this regulation.

### 2.2. Product information and documentation

The organisation must make the following information available:

- a) unambiguous identification of products, their type and their declared recycled and/or recovered and/or by-product content;
- b) the location of the production unit and the recovery site (the latter only if the recovery activity is carried out directly by the organisation) and any certification of the environmental management system (EMS) or the eco-management and audit scheme (EMAS) related to the recovery site;
- c) a list and classification of materials entering the product manufacturing process and related documentation for their traceability;
- d) a procedure for determining the recycled and/or recovered and/or by-product content, specifying how the organisation controls all elements that directly or indirectly influence the declared values for the product;
- e) compositional recipes and mass balance to determine the value of recycled and/or recovered and/or by-product content declared by the organisation for each product subject to certification;
- f) the product's production records; and
- g) self-monitoring records from the product's production process.

#### 2.2.1. Unique product identification

The organisation shall identify the products for which it applies for certification of the recycled and/or recovered and/or by-product content, drawing up for this purpose a document containing at least the following elements:

- the manufacturer's name;
- the address of the production unit where the manufacturing process takes place for the products subject to certification;
- an identification of the products subject to certification and their type;
- an indication of the value of the recycled content (possibly split between pre-consumer and post-consumer);
- an indication of the value of the recovered material content;
- an indication of the value of the by-product content;
- the date the document was issued.

#### 2.2.2. Raw materials list, classification and tracing

The organisation must prepare a list of input materials for the production process for the product being assessed. Each material must be classified in one of the following categories:

- recycled material (with indication of pre-consumer and post-consumer components, if declared by the organisation);
- recovered material;

- by-products;
- raw material containing recycled material;
- raw material containing recovered material;
- raw material containing by-products;
- virgin raw material.

For each material so classified, the organisation must have the documentation indicated in section 2.2.2.1 and the documents needed to identify the quantities used and their origin (delivery notes and/or invoices, forms, etc.).

The classification of the material as 'pre-consumer' or 'post-consumer' must be a function of the origin of the recycled material.

#### 2.2.2.1. Raw material tracing documentation

The organisation must have documentation to prove the qualification of the materials, semi-finished products or products used in the manufacturing process of the product to be certified.

Examples of suitable documentation include the following:

a) For waste recovered directly by the organisation: recovery authorisation (with identification of CER codes), forms, loading and unloading registers, Single Environmental Declaration Form (MUD);

b) For a material qualified as a by-product by the organisation that results from a production residue of a manufacturing process different from or equal to that of the product subject to certification: declaration by the organisation of qualification of the material as a by-product, containing explicit reference to conformity with D. Lgs. 152/2006, Art. 184a(1) and Ministerial Decree no. 264 of 13 October 2016;

c) For a material provided by a supplier of the organisation:

- an Environmental Product Declaration (EPD) drawn up in accordance with UNI EN ISO 14025 and validated by a UNI CEI EN ISO/IEC 17065 accredited Certification Body, containing information on the recycled and/or recovered and/or by-product content along with the additional environmental information;
- a product certification of the recycled and/or recovered and/or by-product content issued by a UNI CEI EN ISO/IEC 17065 accredited Certification Body, in conformity with this regulation or other equivalent ones (e.g. UNI-PdR 88:20, Remade in Italy®, etc.);
- the conformity documentation required by EU or national 'End of Waste' regulations (if the supplier performs the end-of-waste operations);
- the documentation qualifying a material as a by-product in accordance with D. Lgs. 152/2006, Art. 184a(1) and Ministerial Decree no. 264 of 13 October 2016 (e.g. contract between residue producer and user, transport documents, by-product sheet, etc.);
- the documentation proving the content of recycled material and its origin from an authorised entity for waste recycling or preparation for re-use (e.g. waste recovery authorisation and evidence of the recycled content declared by the authorised entity and all intermediaries in the supply chain);
- the validation of a self-declared environmental claim in accordance with ISO 14021 issued by a Certification Body accredited in accordance with ISO 17065 for product certification, valid on 1 December 2022 and until the expiry of the validation.

The documentation mentioned above must be kept up to date and must be easily accessible.

When none of the above evidence is made available by the organisation for a material from a supplier entering the manufacturing process, the contribution of that material to the calculation for the recycled and/or recovered and/or by-product content shall be considered nil.

In line with the above and in order to promote overall growth of the system in the direction of a guarantee offered by the entire supply chain for materials constituting a product containing recycled and/or recovered and/or by-product material, the organisation is encouraged to define a procurement policy that favours suppliers able to certify the recycled and/or recovered and/or by-product content of their products with evidence subject to third party verification (i.e. EPD or accredited product certifications). This procurement policy must be specifically aimed at suppliers of products for which

the legislation in force does not already require specific evidence and/or certification as to its recycled and/or recovered and/or by-product content.

### **2.2.3. Procedure for determining and monitoring recycled and/or recovered and/or by-product content**

The organisation must establish a documented procedure that specifies how the company monitors all the elements that directly or indirectly affect the declared recycled/recovered/by-product content.

These procedures may also consist of documents belonging to the organisation's certified management systems and/or factory production control (FPC) systems, if any.

These procedures must be codified and dated and must include at least the following elements:

- unambiguous identification of the product being certified and its declared recycled/recovered/by-product content and possible criteria for grouping similar products;
- a description of the production process with the input material flows, the manufacturing processes, and how the process parameters to determine the recycled/recovered/by-product material content is recorded;
- definition and documentation of tasks and responsibilities for all significant stages of the data collection and analysis process, and for the operational management of those processes;
- a risk analysis of factors that may affect the declared values being verified;
- classification of raw materials and documentation to determine the recycled and/or recovered and/or by-product content in the product subject to verification;
- identification of the time period referred to for the data collected for verification;
- the methods for collecting data on the mass of each input material during the reference period;
- the method used to determine the percentage of recycled/recovered/by-product material in the raw materials;
- the instrumentation used to determine the quantities of each input material and the related measurement uncertainty and calibration methods;
- evidence of any experimental tests carried out to determine the recycled and/or recovered and/or by-product content values related to the moisture content of the material inputs to the manufacturing process and/or the process losses (e.g. fire loss tests), when these are relevant to the calculation performed;
- a definition of the factory production's self-monitoring process;
- the data storage methods and related supporting evidence;
- handling of anomalies and complaints about the declared value of the recycled and/or recovered and/or by-product material content.

### **2.2.4. Tasks, responsibilities and resources**

The organisation must define and document the tasks and responsibilities for every significant phase of the data collection and analysis process, and for the operational management of processes. The organisation must also establish the resources (human and material) to ensure the performance of the certified product and the implementation of its manufacturing processes.

The organisation must also appoint a certification contact person to interface with the certification body for the certification process.

### **2.2.5. Determination of declared value, compositional recipes and mass balance**

The instructions in this section must be followed, subject to section 2.2.6 below, to determine the declared value of the content of recycled and/or recovered material and/or by-product.

The organisation shall prepare a mass balance for each separate compositional recipe used to make the product, in order to define the value of the recycled and/or recovered and/or by-product content declared for each product.

The value of the recycled and/or recovered and/or by-product content in the product should be defined according to what is present in the finished product as it results at the end of the manufacturing process and when placed on the market.

For this reason, if the mass balance of the product is determined from the compositional recipe as the input to the product's manufacturing process, it must account for any mass losses of the component materials that occur during the manufacturing process (e.g. moisture loss, baking losses, etc.).

The organisation shall document for the Certification Body the mass balance performed, showing (1) the quantities of all materials entering the manufacturing process expressed in mass/weight, (2) the factors for considering process losses, and (3) the calculation of the value of recycled and/or recovered and/or by-product content in the finished product.

The value of the recycled or recovered or by-product content is expressed as a percentage, using the following formula:

$$X = (A/P) \times 100$$

Where A is the weight of the respective component (recycled or recovered or by-product) material contained in the finished product.

Where P is the weight of the finished product being certified.

If the product's manufacturing process is such that there is variability in the recycled or recovered or by-product content value of the product, one can declare the lowest of these values, which must actually be present in the finished product, by using the following formula:

$$X \geq (A/P) \times 100$$

In this case, please note that the minimum value of the declared content for the product is the lowest of the values resulting from the mass balance calculated from the different compositional recipes used to manufacture the specific product.

Calculating the recycled/recovered/by-product content can be done using a spreadsheet, which must be appropriately codified.

#### 2.2.5.1. Contribution of water in the mass balance calculation

If the recipe for the product subject to certification includes water mixed in with the other raw materials constituting the product, use the following criterion to calculate the declared value of the recycled and/or recovered and/or by-product content:

- when the finished product to be certified is in a solid physical state, one can completely disregard the water input to the manufacturing process in the product composition recipe;
- if the finished product subject to certification is not in a solid state (e.g. liquid, semi-liquid, semi-solid state, etc.), the mass balance calculation to determine the recycled and/or recovered and/or by-product content value uses all the water present in the finished product as the denominator. If this amount cannot be clearly determined, be conservative and consider all the water entering the manufacturing process in the product composition recipe.

Waste water from the production process is explicitly excluded from the definition of pre-consumer material and therefore cannot be considered recycled material.

Any rainwater collected and used in the production process does not constitute '*material removed from the waste stream*' (see the definition of pre-consumer material) and therefore cannot be considered recycled material.

#### 2.2.5.2. Use of fuels from recovered material

If the manufacturing process involves the use of recovered materials as fuels (e.g. RDFs, waste oil, animal meal, etc.), the input fuel cannot be considered part of the finished product. Any ash that may remain incorporated in the finished product may be included in the mass balance when calculating the recovered content. In this case, the manufacturer must provide document the amount of fuel residue after combustion.

### 2.2.6. Declaration of the value of the recycled and/or recovered and/or by-product content defined in different ways

You can only declare a value of the recycled and/or recovered and/or by-product content that is calculated differently from section 2.2.5 if the different calculation method is explicitly indicated by a specific legal provision or a harmonised technical standard.



In this case, the certificate issued by the Certification Body (see section 3.7) must explicitly reference the legal provision or harmonised technical standard used to determine the certified value.

### **2.2.7. Self-monitoring**

#### **2.2.7.1. General information**

The organisation must define, document, implement and maintain a 'production self-monitoring' system used in the manufacturing process for the product being certified to ensure that the recycled/recovered/by-product content of the products placed on the market complies with the values declared by the organisation. All procedures and records related to this self-monitoring must be documented.

The organisation must do this self-monitoring for the entire production of the product being certified, regardless of the production batch or specific supply, unless the certification refers explicitly to a specific production batch. In that case, the self-monitoring must refer specifically to the batch being audited or supplied.

The organisation must do this product self-monitoring systematically and periodically, it must be based on a significant sampling process established in advance.

The monitoring must make it possible to determine the recycled/recovered/by-product content of individual products at the end of the sampled manufacturing process, all the way back to the raw materials that comprise them.

The organisation must define the self-monitoring procedure for the product and have it in place long enough to be able to verify consistency between the declared values and the values actually present in the product at the end of the manufacturing process.

The determination results must be recorded on special forms in the *Internal Self-monitoring Register*, which must be kept for a minimum of two years from the date of the last form. The register must be kept constantly updated and made available to ICMQ, which may request an extract from the register at any time.

#### **2.2.7.2. Organisation**

The tasks, responsibilities and authority of the personnel involved in production self-monitoring must be documented, managed and implemented, and must include procedures for the following:

- a) demonstrating product conformity at the appropriate stages of the process;
- b) identifying and registering any instance of non-conformity;
- c) managing instances of non-conformity;
- d) definition of the causes of the non-conformity and possible corrective action.

#### **2.2.7.3. Receipt and storage of raw materials**

Receiving, checking and storing raw materials is very important for the entire production cycle.

The utmost precision is required in defining procurement orders and in checking incoming supplies. The specifications for all incoming materials must be documented.

Raw materials must be stored in a way that avoids contamination of any kind.

#### 2.2.7.4. Manufacturing process control

The manufacturing process must be subject to controls as set out in Table 1.

Subject		Purpose	Method	Frequency
1	Composition of the mixture	Conformity with the expected composition (weight or volumetric amount)	-Viewing the weighing equipment  -Checking against the production process documents	Daily
2	Production	Conformity with documented factory procedures	Checking actions against factory procedures	Daily

Table 1 - Inspecting the production process

#### 2.2.7.5. Amounts of components

The composition (recipe) must be documented for each type of product for which certification is requested. Specifically, the quantities of each individual component must be reported, expressed in mass/weight.

#### 2.2.7.6. Necessary equipment and facilities

The organisation shall prepare a list of measuring equipment that affects the data in the certification; the calibration interval and maximum permissible uncertainty shall be defined for each instrument.

#### 2.2.7.7. Equipment tests

Instruments and equipment must be tested periodically to ensure they are in an adequate metrological condition.

The organisation must establish the manner and frequency of inspections, without prejudice to the fulfilment of relevant legislative obligations for specific equipment. Table 2 provides an example of this.

The results and evidence from testing operations must be recorded, stored and made available to the ICMQ auditors.

Subject		Purpose	Method	Frequency
Measuring and testing equipment				
All measuring and testing equipment		Correct operation and accuracy	Where necessary, calibration of equipment that has been calibrated in a traceable way to national standards and is used exclusively for that purpose except as indicated in the test method	At the time of installation or re-installation, after major repairs or once a year
Production and storage equipment				
1	Storage of materials	Absence of contamination	Visual inspection or another appropriate method	- Upon installation - Weekly
2	Weighing or volumetric metering equipment	Proper operation	Visual inspection	Daily
3		Accuracy declared by the	Calibration of equipment that has been calibrated in a	- Upon installation or

		manufacturer	traceable way to national standards and is used exclusively for that purpose	re-installation - Weighing: once a year - Volumetric: twice a year - As needed
4	Mixers	Wear and proper operation	Visual inspection	Weekly
5	Moulds	Cleanliness and condition	Visual inspection	Daily

Table 2 - Equipment inspection

#### 2.2.7.8. Measures to handle non-conformity following self-monitoring

The manufactured products yielding negative results for the self-monitoring tests cannot be marked and marketed as products conforming to the certification regulated by this regulation.

The organisation must take the necessary steps to rectify the defect where possible.

These products must be stored separately or be appropriately identified/marked differently from those subject to certification.

#### 2.2.8. Document and record management

All documents and records (e.g. transport documents, waste management documentation, test reports, calibration certificates, etc.) must be available for a time defined by the organisation. Without prejudice to longer deadlines defined by law, documentation must be kept for at least three years.

The organisation must define the methods for managing the documents relevant to the certification, in order to:

- ensure that the relevant versions of the applicable documents are available at the points of use;
- ensure that the documents remain legible and easily identifiable;
- ensure that documents of external origin deemed necessary for certification purposes are identified and that their distribution is controlled;
- prevent the unintentional use of obsolete documents, and adopt a way to appropriately identify them if they are kept for any purpose.

#### 2.2.9. Managing anomalies and complaints

The organisation must keep track of any anomalies in the manufacturing process or in the measuring instrumentation that may affect the reliability of the data collected for the purpose of certification.

The organisation must assess the influence of the recorded anomalies on the reliability of the overall data reported in the certification.

The organisation shall record complaints received concerning the products and characteristics subject to certification and shall analyse the causes of those deemed justified in order to assess the need for corrective action.

### 2.3. Identification and Traceability

#### 2.3.1. General information

Each product must be clearly and unambiguously identifiable through an appropriate code combined with a commercial name. This code provided must consist of a set of alpha-numeric characters.

In the same way, every single supply - or batch of products - delivered to a customer must allow its origin and date of manufacture to be verified. The organisation must mark the products or packaging to this end. Internal documents related to the sale and delivery of branded products must also refer to the data given on the product or packaging.

This data, if already used by the organisation, must be communicated to the Certification Body at the same time as the application in order to verify its completeness. Where appropriate, the Certification Body will agree directly with the organisation on the changes to be made, and will keep track of them.

### **2.3.2. Product marking**

The product mark granted for use by the customer must be clearly and unambiguously affixed. The ICMQ Product Trademark must be distinct and separate from the CE marking, if any, and must always be accompanied by the certification of the recycled/recovered/by-product content. The organisation must be careful not to mislead users.

### **3. CERTIFICATION BODY**

#### **3.1. General information**

The certification activity must be done by bodies that operate as Product Certification Bodies in conformity with UNI CEI EN ISO/IEC Standard 17065, and they must be specifically accredited by Accredia, the sole Italian accreditation body.

In particular, the certification body must be structured in such a way as to:

- guarantee the necessary requirements of independence, impartiality, transparency, competence and absence of conflicts of interest;
- ensure the homogeneity of evaluations;
- define, adopt and respect its own system of documented procedures related to the verification activity covered by this document, as well as its own code of ethics.

It is the certification body's responsibility to:

- define the offer for the service and receive the application for certification from the organisation;
- review the application and offer, formulate its acceptance, identify and appoint its own auditor, and ensure the auditor's competence and independence;
- plan and perform activities to verify the value of the recycled and/or recovered and/or by-product content declared by the organisation;
- verify that the organisation is able to keep the value of the recycled and/or recovered and/or by-product content constant with production and over time;
- report the results of the audit conducted, including the closure of any 'non-conformities' or 'recommendations' and the position on the certification of recycled and/or recovered and/or by-product content;
- review the auditor's verification activities and monitor their work periodically;
- decide on the granting and issuance of the certificate.

#### **3.2. Verification methods and duration**

The Certifying Body must have procedures that define:

- the verification and certification method in accordance with section 4 below of this regulation;
- the methods for determining the duration of the verifications.

These procedures must consider:

- the type of product;
- the complexity of the verification activity in relation to the complexity of the production process;
- the number of production sites and the recovery site (if any).

Based on the information provided by the organisation, the Certification Body determines the duration of the verification activities. In any case, the minimum verification time must not be less than 0.5 auditor worker-days, established based on the presence of all the following conditions:

- all products are of the same type (the same product family);
- no more than 10 distinct product composition recipes;
- all products are manufactured in the same production unit;
- the organisation does not directly do any recovery of the waste used for the product being verified.

The verification activity by the Certification Body must in any case include a verification activity at the production unit.

The Certifying Body must verify the accurate traceability of incoming materials by spot-checking the relevant documentation. In this context, ICMQ will do an inspection at the recovery site, if any, only if this activity is performed by the organisation requesting the conformity verification and if the site is different from the production unit.

If the organisation has an environmental management system for the recovery site in conformity with UNI EN ISO 14001 and certified by a third-party accredited body under MLA EA/IAF and/or an EMAS registration, the duration of the ICMQ audits can be optimised.

### **3.3. Verification reporting**

The verification activity by the Certification Body's auditor must be properly accounted for, and to this end the auditor shall draw up a report providing evidence of the verifications performed.

In particular, the report must give evidence of any discrepancies found as indicated in the following sections, and note any requests for clarification made and their handling by the organisation.

The report must be comprehensive in order to provide sufficient elements for the certification decision by the Certification Body.

### **3.4. Non-conformities and recommendations**

During the auditor's verification of the recycled and/or recovered and/or by-product content, findings may emerge. The certifying body defines in its own procedures the levels of findings in 'nonconformity' and 'recommendation' and how they are to be handled.

Possible findings include the following cases:

- gaps in the content or lack of documents supporting the correct assessment of the recycled and/or recovered and/or by-product content;
- incorrect calculation of the recycled and/or recovered and/or by-product content;
- incorrect communication to customers;
- incorrect use of the licensed certificate or trademark.

A 'non-conformity' must be properly reported to the organisation and properly tracked to verify the resolution process. Failure to fix the non-conformity within the established time frame due to the organisation's shortcomings is a reason for not issuing or suspending the certification.

A 'recommendation', on the other hand, is only a suggestion that may or may not be taken up by the organisation and whose handling is not a reason to refuse certification.

If there are no obstructive findings, the Certification Body shall decide to issue the certificate.

### **3.5. Confidentiality of data**

All data and information concerning the organisation of which the Certification Body becomes aware as it performs the activities subject to this regulation are confidential. Access thereto must be governed by a specific procedure that imposes a confidentiality obligation on auditors and on the staff engaged in the processes involved in this regulation. The organisation must give the inspector access to the data to guarantee that the audit can be conducted correctly by an independent entity.

### **3.6. Reviewing verification activity and granting certification**

The Certification Body must have procedures to govern the review, deliberation and issuance of certification.

The Certification Body's review is scheduled at the end of the auditor's verification activity, to verify the suitability of the verification process performed. At the end of the review, if it is positive, the decision-maker (or deliberating body) at the Certification Body will decide whether to grant the certificate, and if it is granted it will issue the certificate and send it to the organisation.

The Certification Body governs the competences of the decision-maker or the composition of its deliberating body. In the latter case, the body must in any case consist of a chairperson and at least one figure whose competences are set out in section 3.10.1 of this regulation.

### **3.7. Elements of the Certificate**

Upon completion of the audit and the subsequent decision to grant the certificate, the Certification Body issues the certificate, which must contain the following minimum elements:

- certificate number;
- name of the organisation;
- address of the production site or possibly its identification code;
- subject of the certificate: content of recycled and/or recovered material and/or by-product;
- reference standards: this regulation and, if applicable, the Certification Body's procedures;
- the certification system adopted: 3 – ISO/IEC 17067;
- the type and designation of the certified product;
- the separate values of recycled content, recovered content and by-product content in the certified product;
- value given by the sum of the value of the recycled content, recovered content and by-product content in the certified product;
- (only as provided for in section 2.2.6) a note to indicate the technical standard or legal provision whose method was used to calculate the certified value;
- (only as provided for in section 4.5) the separate values of the recycled content, recovered content and by-product content in the certified product;
- (only as provided for in section 4.5) the value given by the sum of the value of the recycled content, recovered content and by-product content in the specific component of the certified product;
- (only as provided for in section 4.6) a note to indicate the specific production batch or the specific destination supply of the certified product;
- the certificate's date of issuance;
- the date of the last revision;
- the expiry date: 3 years;
- the Certification Body's identifying details and logo.

At the Certification Body's discretion, any further information deemed useful to clarify the content of the certificate may be included in the certificate.

### **3.8. Certificate Management**

#### **3.8.1. First issuance**

Based on the verification activity conducted as provided for in section 4.1, the Certification Body shall issue the certificate, which shall be delivered to the organisation with a copy to the plan manager.

#### **3.8.2. Retention**

During the certificate's validity period (3 years), the Certification Body must monitor the organisation to verify that there are no changes to the value of the recycled and/or recovered and/or by-product content, with the inspection conducted as stipulated in the following section. 4.2.

#### **3.8.3. Extension, reduction and adjustment**

The Certification Body must regulate the methods for extension, reduction or adjustment of the issued certificate.

If any of the following occur:

- reduction of the object of the certificate;

- extension of the certificate to other products;
- changes in the facilities where the manufacturing process for the certified product takes place;
- changes in other factors that may alter the previously certified recycled and/or recovered and/or by-product content value;
- adaptation of the rules or this regulation;

the certificate must be modified, and it will be reassessed according to the methods described in section 4 of this regulation.

The Certification Body will decide whether to grant the certificate's reduction/extension, which will also include the date it is updated.

#### **3.8.4. Renewal**

At the end of the period of validity, the Certification Body can request renewal following a new assessment and decision. Each significant variation since the date of the last revision must be appropriately examined during the site inspection for the same procedures and duration as the first issuance.

The certificate issued will be updated as a result, along with the new revision and expiry dates.

#### **3.8.5. Suspension or revocation**

The Certification Body must regulate the methods for suspension, renunciation or revocation of the issued certificate.

#### **3.8.6. Certificate expiry date**

The Certification Body must regulate how the expiry of the certificate is to be managed. In the event of non-renewal and consequent expiry of the renewal, the Certification Body shall notify the plan operator.

### **3.9. Term of the certification**

A certification remains valid for a period of three years, after which it must be subject to audit and review as provided for in this regulation. A certification must be reviewed and updated when necessary to adapt its content to changes that have taken place at the site considered for the certification, or under other circumstances that might affect its content and accuracy.

The Certification Body's procedures must also require an audit to be carried out whenever there is a report of significant changes to the conditions verified at the time of the audits.

### **3.10. The auditors**

The entities that may perform audits and issue certifications in accordance with this regulation are product certification bodies accredited by Accredia in accordance with UNI CEI EN ISO/IEC 17065.

The bodies must regulate the competences required of the Certification Body's auditors and the subjects involved in the verification activity and how they are to be monitored over time.

Competencies should be established in accordance with the sections below.

#### **3.10.1. Competences of the figures involved in the Certification Body's certification process**

The body must regulate the qualification requirements for the Certification Body's personnel involved in the certification process, taking into account the following minimum elements:

- knowledge of audit principles, practices and techniques;
- knowledge of the Certification Body's processes;
- knowledge of the applicable legislation and mandatory regulations;
- knowledge of the manufacture of the specific product (or its family) whose recycled and/or recovered and/or by-product content is subject to certification, and experience with the production process/product subject to certification.



If the decision-maker (or deliberating body) -- i.e. the person (the subject) appointed by the Certification Body to make the certification decision based on all the information related to the assessment, its review and any other relevant information -- does not have the necessary expertise, he or she must use technical experts with veto power for the assessment of the strictly technical aspects. They must meet the criteria defined above and have at least three years of experience in environmental issues.

The evidence and results documented during the annual oversight audits must be reviewed by competent personnel at the Certification Body other than those who performed the oversight audit.

The criteria for the competence of the personnel doing this review are the same as those set out in this section.

### 3.10.2. Verification of the independent status of the auditors

The Certification Body monitors the independent status of the auditors through ascertainment that they are not involved with or do not have financial relationships with the organisation.

Auditors are required to:

- be uninvolved in any event or condition that could hinder their free and unbiased performance of the services assigned to them;
- not have had economic dealings with the organisation assigned to them in the last 3 years and must undertake not to be involved therein during their audit;
- be free from any conflict of interest that might prejudice their proper performance of the audit;
- not be involved in consulting activities related to the assessment required for certification.

If the Certification Body possesses accreditation, that is sufficient to demonstrate the independent status of the auditors. One of the auditor's tasks is to report any cases of conflicts of interest that could arise pertaining to the assignment.

The Certifying Body analyses the risk associated with using the auditor and takes consequent measures for its elimination and/or mitigation.

### 3.10.3. Qualification of the auditors' competencies

The certification body's own procedures regulate the process of monitoring and supervising the auditors' competence based on:

- documentary verification through examination of CVs, certificates, publications, etc;
- accompanying auditors during expert verification activities.

The minimum competence for auditors must include:

Parameter	Lead auditor
Education	Technical high school diploma or technical degree
Work experience	4 years for university graduates, 5 years for secondary school graduates
Product knowledge	At least two years of expertise in the manufacture of the product (or its family) subject to certification
Training	Normally, a course for third party auditors of environmental management systems (EMS), quality management systems (QMS) qualified by an ACCREDIA-accredited Certification Body or other recognised bodies, or alternatively, training courses held by ACCREDIA-accredited Certification Bodies to train the inspectors working on behalf of the Certification Bodies in Environmental Product Declaration (EPD) validation and/or product certification activities
Specific training	Basic training through an 8-hour course on technical legislative issues, including environmental aspects related to waste recovery/recycling.

Audit experience (1)	<p>at least 1 audit carried out under the supervision and guidance of an already qualified lead auditor.</p> <p>If the auditor is already lead auditor for other certification schemes, there is no additional requirement.</p>
<p>(1) Auditors already qualified by Certification Bodies for EMS/SGQ/EPD schemes or for other product certification schemes (e.g: CPR) fulfil the requirement.</p>	

Continuous updating of auditors' skills must be demonstrated.

## 4. CERTIFICATION PROCEDURE

### 4.1. Initial assessment or renewal process

The process for certifying the recycled and/or recovered and/or by-product content of an organisation's products involves the following activities by the Certifying Body:

- a) a request for quotation and acquisition of useful information from the requesting organisation for the preparation of the offer;
- b) definition of the duration of the verification activity and consequent preparation and dispatch of the offer to the organisation defined in accordance with its fee schedule and accompanied by the application for certification;
- (c) the organisation signs the contract, followed by a review of the contract and acceptance of the application for certification;
- (d) appointing the inspection verification team and scheduling the audit activities;
- (e) the inspection team performs the audit activity as set out in section 4.1.1 and subsections of this document. The activity must be reported through an appropriate Audit Report according to the procedures and methods defined by the Certification Body;
- (f) review of the inspection team's audit activity;
- (g) a decision on granting certification by the Certification Body's decision-making body;
- (h) sending the certificate to the organisation.

#### 4.1.1. Audit activities

The audit consists of documentary verification activities and on-site inspections.

To demonstrate the conformity of the product subject to certification with the values declared by the organisation, the methodology for calculating the recycled/recovered/underproduct content must be audited.

Whenever there is a change in the raw materials, the proportions used, or the equipment or processes that could significantly alter the recycled/recovered/by-product content, the calculation must be re-audited.

The audit must be conducted for each individual production unit and is designed to ascertain that the organisation meets all the requirements of this regulation.

During the visit, the auditor:

- a) verifies the complete and exact definition of the products subject to certification;
- b) verifies the correct traceability of materials entering the manufacturing process;
- c) verifies the contents of the organisation's procedure;
- d) verifies that the calculation method for the recycled/recovered/by-product content is correct;
- e) verifies the organisation's self-monitoring production system in relation to the performance covered by the certificate;
- f) verifies the implementation, maintenance and recording of all actions under self-monitoring;
- g) checks the consistency between the declared values and the values calculated by the organisation for the recycled and/or recovered and/or by-product content;
- h) verifies (on a sample basis) the consistency between the recycled/recovered/by-product content values declared by the manufacturer and the values obtained in the product at the end of the manufacturing process.

The visit may only occur after the organisation has performed its self-monitoring procedure on its production for a significant period of time to ascertain the declared value of recycled and/or recovered and/or by-product content.

#### 4.1.1.1. Auditing the complete and exact definition of certified products and declared values

The Certification Body verifies that the organisation has identified the products for which it applies for certification and their declared values by analysing the document containing the information set out in the previous section. 2.2.1.

#### **4.1.1.2. Verifying the traceability of materials entering the manufacturing process**

The Certification Body verifies the correct traceability of raw materials by means of spot checks on the relevant documentation.

In this context, the Certification Body must also inspect the recovery site only if this activity is carried out directly by the organisation itself and if the recovery site is different from the production unit.

ICMQ reserves the right to interrupt the audit process if, during the course of its audit, non-conformities with the environmental regulations applicable to the subject of the verification are uncovered that were not previously detected by the competent bodies.

In such cases, the verification process may only continue after the organisation provides evidence of the resolution of the issue raised.

#### **4.1.1.3. Checking the contents of the organisation's procedure**

The certification body shall verify that the organisation has put in place the procedure indicated in section 2.2.3 and that it is correct and complete.

#### **4.1.1.4. Verifying the accuracy of the method for calculating the recycled and/or recovered and/or by-product content**

These verifications are performed on the products covered by the certification based on sampling as indicated in section 4.1.1.7.

- a) Verifying the accuracy of the calculation method the organisation uses to establish the value of the recycled/recovered/by-product content;
- b) Verifying the correctness of the values calculated through the mass balance prepared by the organisation for each recipe referring to the products subject to certification;
- c) Verifying the consistency between the values declared by the organisation and the values calculated for each product subject to certification.

If the organisation declares a single minimum value of recycled and/or recovered and/or by-product content for a large number of products of the same type whose recipes present the same constituent raw materials but with different compositional percentages, the Certification Body shall decide whether to verify this by identifying and verifying only the recipe representing the most unfavourable case in terms of calculated values of recycled and/or recovered and/or by-product content.

#### **4.1.1.5. Verifying the self-monitoring of the factory production process**

The Certifying Body must verify that the organisation has defined and effectively implements its own factory production control process (self-monitoring) as set out in section 2.2.3.

#### **4.1.1.6. Verifying the product resulting from the manufacturing process**

The certification body shall ascertain the consistency between the calculated recycled and/or recovered and/or by-product content, the declared content and the content actually contained at the end of the manufacturing process in the product under verification.

This activity is carried out by means of audits conducted in the production unit, and has the following two purposes:

- a) to ascertain the actual use of the production recipes subject to the previous verifications of the calculation of the recycled and/or recovered and/or by-product content (section 4.1.1.4), by direct verification of the manufacturing process plant, and/or on the basis of production data records and/or according to alternative evidence that the Certification Body considers equivalent to the above;
- (b) to verify the substantial consistency, observable over a defined, significant time period, between the total quantities of recycled and/or recovered material and/or by-product supplied as input to the manufacturing process and the total quantities of products subject to verification leaving the manufacturing process;

The verification activity by the certification body referred to in point a) above is carried out according to the sampling criteria indicated in section 4.1.1.7.

#### 4.1.1.7. Sampling criteria

The auditor's verifications will relate to a variable number of products, determined as follows:

Type of audit	Verifications	Sampling
Evaluation verification or renewal	On the values calculated by the organisation	100% of the declared products
	On the values obtained for the product at the end of the manufacturing process	At least 20% of the declared products

## 4.2. Verification of the extension, reduction or adjustment of the certificate

Verification for the extension, reduction or adjustment of the certificate may relate to the following cases:

- a) Verifying the extension, reduction or adjustment of products listed on an issued certificate.

In this case, the auditor performs at least documentation checks. In the next phase of the certificate monitoring verification, the auditor will select the sample on which to carry out the verifications referred to in this regulation, including the products covered by the extension.

- b) Audits for extension or adaptation of production units.

It is not possible to extend a certificate to more than one production unit. It is, however, possible to do verifications to issue a new certificate for products manufactured in a different production unit. In this case, the auditor performs verifications in the same manner as for an initial assessment verification.

If a change is requested to the indication of the production unit in an issued certificate, this can only be done following a verification by the auditor, conducted in the same manner as for an initial assessment verification. The verification activities and their duration will be commensurate with the extent of the requested change and will in any case include a field verification at the site of the production unit included in the certificate in place of the one previously indicated.

Requested changes to issued certificates related to changes in company region, production unit addresses or product names are outside the scope of this section and will be handled by the Certification Body in accordance with its own methods and procedures.

- (c) verifications to adapt the issued certificate to a new version of the standard and/or this regulation.

In this case, the auditor performs document and/or field audits according to the extent of the variation subject to the revision of the standard and/or this regulation, following which, if reviewed and considered positive, the body will decide on the reissuance of the certificate. And it will decide on its communication to the organisation.

## 4.3. Periodic oversight procedures

The process for certifying the recycled and/or recovered and/or by-product content of an organisation's products involves the following activities by the Certifying Body:

- a) Definition of the duration of the verification activity in accordance with the contract or adjustment following possible variations;
- b) For contract adaptations, the organisation signs the contract and then it is reviewed and accepted;
- (d) Appointing the inspection audit team and scheduling the audit activities;
- (e) The inspection team performs the audit activity as set out in section 4.3.1 and its sub-sections of this document. The activity must be reported through an appropriate Audit Report according to the procedures and methods defined by the Certification Body;
- (f) Review of the inspection team's audit activity;
- f) Decision on the continued validity of the certification and decision on the possible reissuance of the certificate (if necessary)

(g) Notification of verification result and transmission of updated certificate, if any.

#### 4.3.1. Periodic oversight audits

Oversight audits take place at least once a year, and include field audits at the production unit where the auditor:

- verifies any updates to the values declared by the organisation for the products covered by the previously issued certificate;
- verifies any changes to the organisation's procedure;
- verifies that the method for calculating the recycled and/or recovered and/or by-product content has not changed;
- verifies any changes to the traceability of materials entering the manufacturing process;
- verifies any changes to the organisation's production self-monitoring system;
- verifies the implementation, maintenance and recording of all actions under the production self-monitoring system;
- verifies the products covered by the recycled/recovered/by-product content certificate at the end of the manufacturing process as compared to the values declared by the organisation. These tests will be conducted according to the sampling criteria set out in section 4.3.2 below of this regulation.

If, during the audit visit, the ICMQ auditor finds that not every requirement related to this regulation is fully complied with, or finds deficiencies in the essential requirements, ICMQ will ask the organisation to resolve all the deficiencies found and the causes that generated them.

The Certification Body must make provision in its procedures for additional oversight visits.

To obtain confirmation of the validity of its certification, the organisation must:

- successfully pass the oversight verifications;
- reach the point at which the verifications of the recycled/recovered/by-product content confirm what the client has declared;
- fully comply with the requirements of this regulation.

#### 4.3.2. Sampling criteria in the oversight phase

The sample consists of a variable number of products, determined as follows:

Type of audit	Verifications	Sampling
Oversight verification if there are changes to the calculation method	On the values calculated by the organisation	100% of the products in the certificate
	On the values obtained at the end of the product manufacturing process	At least 20% of the products in the certificate
Oversight verification if there are no changes to the calculation method for the mass balance	On values calculated by the organisation for new products or for products in the certificate with a modified value of recycled and/or recovered and/or by-product content.	100% of the products in the certificate
	On the values obtained at the end of the product manufacturing process	At least 20% of the products in the certificate

The samples will be identified by the ICMQ auditor by taking into account the products sampled in the previous visit and their availability, safeguarding the rotation criterion.

#### 4.4. Requirements to verify products placed on the market by distributors, importers and authorised representatives

If a verification request for recycled and/or recovered and/or by-product content is received from a client as a distributor, an importer or an authorised representative for the product and not directly from the manufacturer itself, the verification process shall follow the steps described below.

The organisation provides the Certification Body with the following evidence:

1. A copy of the contract between the manufacturer and the distributor/importer/authorised representative that governs the agreement to distribute the product being verified, as well as the possible use of trademarks registered by the manufacturer;
2. A declaration by the distributor's/importer's/authorised representative's legal representative that the product acquired from the manufacturer is placed on the market without any alteration to the verified characteristics;
3. Two-way relationship table between the product code (product identifier and product name) created by the manufacturer and the one assigned by the distributor/importer/authorised representative;
4. Certificate of recycled and/or recovered and/or by-product content issued to the manufacturer by the Certification Body and forwarded by the latter to the distributor/importer/authorised representative.

If the certificate referred to in point 4) is not already available, the organisation must have the verification done at the manufacturer's production units from which the product is supplied, in the same way as described in the previous sections of this regulation.

#### 4.5. Certification requirements for the recycled and/or recovered and/or by-product content of individual product components

If the organisation, in addition to the value of the recycled and/or recovered and/or by-product content of the finished product, requests that the value of the recycled and/or recovered and/or by-product content of one or more of the components (materials and/or semi-finished products) of the finished product also be indicated on the certificate, these components must fall within the scope of this regulation, subject to the positive outcome of the verifications conducted on the basis of the following situations:

- a) The component consists of a material and/or semi-finished product made directly by the client company applying for certification. In this case, the verification of each component is subject to the same requirements as in this regulation.
- b) The component consists of a material and/or semi-finished product acquired from another supplier by the organisation seeking certification. In this case, the recycled and/or recovered and/or by-product content of only those components whose value is attested by a certificate issued to the supplier by an independent third-party body may be included in the certificate, according to one of the following alternative documentation:
  - the validation of a self-declared environmental claim in accordance with ISO 14021 issued by a Certification Body accredited in accordance with ISO 17065 for product certification, valid on 1 December 2022 and until the expiry of the validation;
  - a product certification for the recycled and/or recovered and/or by-product material content issued by an accredited certification body in compliance with ISO 17065 (e.g. Remade in Italy®, Plastica Seconda Vita®, certification in compliance with UNI-PdR 88:2020, etc.);
  - an Environmental Product Declaration (EPD) verified by an accredited certification body in accordance with ISO 17065, such as those published by the EPDItaly® Program Operator.

In both (a) and (b), the value of the recycled and/or recovered and/or by-product content will be entered in the certificate only for the component for which the above-mentioned verifications have been successful.

#### 4.6. Product verification requirements for a specific batch or supply

The contents of this regulation also apply to a organisation's product from a specific production batch or a product intended for a specific delivery.

The organisation must clearly identify the specific production batch or supply for the products subject to verification, indicating either:

- the production batch number/code and its date and the indication of the destination order;
- the supply code and the date of its acquisition and an indication of the destination order;

This information will be explicitly stated on the certificate, the validity of which is therefore limited to the lot or supply indicated.

In such cases, the verifications will follow the same procedures as those provided for in this regulation.

Please note that if the product being verified relates to several specific production batches or several specific supplies, the verification will be inherent to all identified batches or supplies.

The oversight verification provided for in these regulations will continued until the production batch or identified supply is completed.



## **5. ADMINISTRATION**

### **5.1. Fee schedule**

The certifying body must prepare a fee schedule that must specify the individual amounts for:

- handling the certification file;
- documentary and on-site inspections (initial/additional/extraordinary assessment, extension, adaptation, oversight or renewal);
- issuance of certification (certificate issuance);
- extra expenses (food, accommodations and travel).

In particular, audit periods must also take into account testing the traceability of materials entering the manufacturing process for the product subject to certification (see section 2.2.2) related to waste management, recovered materials and by-products possibly used in the product subject to certification, and the inspection of the waste recovery site when this activity is done directly by the organisation applying for certification if at a site different from the production unit.

If the organisation has an environmental management system for the recovery site that is compliant with UNI EN ISO 14001 and certified by an accredited third-party body in the MLA EA/IAF framework and/or an EMAS registration, the Certification Body's audits may be based on a lower number of worker-hours, with a consequent reduction in the duration of the certification body's audit.

### **5.2. Appeals**

The organisation can appeal decisions and proceedings taken by the Certification Body, sending a copy of the appeal to the Plan Manager. The way in which the appeal is handled must be specifically defined by the Certification Body.

### **5.3. Challenges and complaints**

Challenges and complaints concerning the plan manager's activities and the Certification Body's activities may be made by the organisation or by third parties. A description of the challenges and complaints process is provided upon request.

### **5.4. Arbitration procedures**

If challenges should arise related to this Regulation, the parties involved must try to resolve them amicably. If the parties fail to reach an agreement after an amicable negotiation, the challenge must be presented for arbitration. The arbitrator will be chosen jointly by the two parties from among accredited professionals of the branch, and it will judge 'ex bono et æquo' without having to standardise the procedural rules.

The location of the arbitration will be Milan.