Certification of Recycled plastic (Recycled Plastic Content Scheme)

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INTRODUCTION

1.About ATC Internationa0l

ATC International is based in the United Kingdom and provides international certification across the world.
ATC International offers a range of services, including:

- Management system certification
- Product certification
- Inspection services
- Examining and certification services
- Validation and Verificatiom

Also, ATC International operating certification of persons.
ATC has been changed thinking of the industries to build a better world about sustainability, social requirements and future of the world and had key roles in this way to improve sustainability, products quality and Social Welfare.
From the beginning until now, we have grown to become a global trustworthy partner for testing, inspection and certification (TIC), providing a comprehensive range of quality services to clients in over 20 countries.
Our in-depth knowledge and experience cover all aspects of the supply chain, across a wide range of industries, including food, feed, energy, forestry, sustainability, social compliance, textiles, chemical and plastic industrial appliances and construction products.

2. How to Use This Document

This document sets forth the overall requirements for conformity with the recycled content Scheme
Guidance and supporting documents are available at https://atcintlgroup.com/. In the recycled content Scheme, the following terms are used to indicate requirements, recommendations, permissions, or capabilities:

- “shall” indicates a requirement
- “should” indicates a recommendation
- “may” indicates a permission
- “can” indicates a possibility or capability

PART 1

SCHEME OVERVIEW

PART 1 SCHEME OVERVIEW

1. About Recycled-Plastic Standards for Product-Certification Activities

The Recycled Plastic Content Scheme is based on **EN 15343:2007 _"Plastics — Recycled plastics — Plastics-recycling traceability and assessment of conformity and recycled content"**. The standard sets out the procedures needed to trace recycled plastics through the supply chain and to calculate, verify and declare the recycled content of finished products.

ATC International will conduct conformity assessment and certification activities against EN 15343 under the framework of **EN ISO/IEC 17065** (requirements for product-certification bodies). The scheme is also designed to meet the **PolyCert Europe Acceptance Criteria** so that certificates issued under this scheme can carry the PolyCert Europe mark once the scheme has been formally accepted. Key PolyCert requirements incorporated include:

- integration of Plan-Do-Check-Act quality-management principles;
- a documented chain-of-custody system (controlled blending model) covering all inbound recyclate streams, internal transfers and finished-product claims;
- third-party verification of external recyclate suppliers using recognised schemes;
- transparent calculation and labelling of recycled content; and
- ongoing surveillance and withdrawal rules to protect market trust.

For applications and supporting documents, visit **https://atcintlgroup.com**.

Key objectives of the Scheme

- Give the market a trusted, harmonized tool to verify declared recycled-plastic content.
- Provide manufacturers with an internationally recognized mechanism to communicate recycled-content claims.
- Ensure that both products and supporting management systems comply with at least EN 15343.
- Keep the Scheme responsive to regulatory, technical and circular-economy developments through a continuous-improvement approach.

The **Recycled Plastic Content Scheme** (hereafter "the Scheme") therefore defines the rules for audit, certification, surveillance and labelling of products that contain verified amounts of recycled plastics.

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For more information or to apply for certification, please visit: https://atcintlgroup.com/

ATC International is the scheme owner of the **Recycled Plastic Content Scheme**. Only ATC International has rights to establish and change this scheme when it is necessary.

ATC International will establishing and changing the scheme, when necessary to ensure that scheme continues to meet market needs and accreditation manager is responsible to Informing the ABs any relevant information and developments relating to the scheme.

In overall, this scheme review by impartiality committee every year as appropriate structure that fairly represents the interests of all parties significantly concerned, without any interest predominating. Then it will review and approve by a committee include CEO, COO, Accreditation manager and Scheme manager. However, when necessary, a regulatory or accreditation body may request a change or review of certain requirements. In such cases, the review will be conducted with the guidance or participation of the respective body, and any changes will be made based on the points agreed upon by the above-mentioned committee.

The above committee shall review, the identification and alignment of prerequisites, if applicable, with the competence requirements; The identification and alignment of the assessment mechanisms with the competence requirements; A job or practice analysis that is conducted and updated to:
-Identify the tasks for successful performance
-Identify the required competence for each task;
-Identify prerequisites (if applicable);

Any updates to the plan will be announced through the website and the DOC Center section.

1. Ownership

ATC International UK is the Scheme Owner. All intellectual-property rights and the authority to revise the Scheme reside exclusively with ATC International.

2. Language

English is the original and valid version of the Scheme.

3. Aim And Objectives

The aim of the Scheme is to ensure that the global plastics industry can rely on a certificate that:

demonstrates traceability of recycled material from source to finished product;

quantifies recycled content with a consistent mass-balance calculation in line with EN 15343;

aligns with circular-economy policies and emerging fiscal measures (e.g., plastics taxes); and

is recognized by PolyCert Europe, regulators and supply-chain partners as credible evidence of conformance.

4. Terms and Definitions

Unless otherwise stated, the terms defined in EN ISO/IEC 17000, EN 15343 and ISO 22095 apply. Key terms include:

Recycled content – proportion, by mass, of recycled material in a product.
Chain of custody – documented sequence of material transfers that ensures traceability of recycled plastics, as required by EN 15343 and ISO 22095.
Conformity assessment – demonstration that specified requirements relating to a product, process, system or person are fulfilled.
Scheme owner means person or organization responsible for the development and maintenance of a conformity assessment system or conformity assessment scheme.
Audit means process for obtaining relevant information about an object of conformity assessment and evaluating it objectively to determine the extent to which specified requirements are fulfilled,
Validation means confirmation of plausibility for a specific intended use or application through the provision of objective evidence that specified requirements have been fulfilled,

Verification means confirmation of truthfulness through the provision of objective evidence that specified requirements have been fulfilled,
Certification – third-party attestation related to products under EN ISO/IEC 17065,
Review means consideration of the suitability, adequacy and effectiveness of selection and determination activities, and the results of these activities, with regard to fulfilment of specified requirements by an object of conformity assessment,
Decision means conclusion, based on the results of review, that fulfilment of specified requirements has or has not been demonstrated,
Surveillance means systematic iteration of conformity assessment activities as a basis for maintaining the validity of the statement of conformity,
Suspension means temporary restriction of the statement of conformity by the body that issued the certificate, for all or part of the specified scope of certification.
Withdrawal means cancellation, revocation of the statement of conformity by the body that issued the statement,
Expiry means ending of the validity of the certfiicate after a specified period,
Manufacturer means any natural or legal person who manufactures related product or who has such a product designed or manufactured, and markets that product under his name or trademark,
Recyclate: Recyclate is plastic material that has been recovered from a previous use or processing cycle and has undergone at least one physical or chemical transformation to enable its reuse in the production of plastics. This includes steps such as sorting, washing, grinding, reprocessing, or pelletizing.
Recyclate may originate from:
Post-consumer sources (e.g., used packaging, disposed products), or
Post-industrial sources (e.g., production scrap, off-spec material).
The material must be managed under a documented traceability system as defined in EN 15343, and its origin, treatment steps, and movement must be recorded and verifiable.

PART 2
REQUIREMENTS FOR ORGANIZATION TO BE AUDITED

PART 2 REQUIREMENTS FOR ORGANIZATION TO BE AUDITED

1. Purpose

This part describes the Scheme requirements against which ATC INTERNATIONAL shall audit organizations to determine compliance with the EN 15343 standard. Certification under this scheme confirms that the organization has implemented effective systems to ensure traceability and verified **Recycled Plastic Content** in its products.

2. Requirements

Organizations shall develop, document, implement, and maintain all relevant procedures, records, and controls as required by:

EN 15343:2007 – Plastics recycling traceability and assessment of conformity and recycled content;

The rules of this certification scheme as defined by ATC International.

Organizations will be audited by ATC International based on the assessment approach outlined in PART 3 of this document.

The organization shall ensure that:

A documented chain-of-custody system is in place and maintained to trace all input recycled plastic materials from receipt to their incorporation in certified products;

Calculations of recycled content percentages are conducted accurately and transparently, in accordance with EN 15343 and using a mass balance or controlled blending approach as applicable;

All supporting records and documentation (e.g., supplier declarations, test reports, internal processing logs) are complete, traceable, and made available during audits.

If external laboratories are used for testing or analysis to verify recycled content or input material properties, the laboratories shall be:

Competent and recognized (e.g., accredited to ISO/IEC 17025),

Using validated test methods, and

Able to provide reliable, reproducible and traceable results.

The same level of competence shall be demonstrated if the organization performs such testing in its own laboratory.

Certified organizations shall also ensure that all labelling and claims on products regarding recycled content conform with:

The actual verified content levels,

All applicable regulatory and market requirements.

Only organizations whose certified products contain a minimum of **10% verified recycled plastic content** are eligible to use the official Recycled Plastic Content Mark.

The percentage of recycled content shall be indicated directly below the logo, in accordance with the format and instructions defined in Work Instruction WI-06, and must match the content level verified and approved in ATC International's audit report.

Organizations with certified products that contain less than 10% recycled content may still be audited and certified under this scheme. However, they are not permitted to use the Scheme Logo on product labels or declarations.

a. Sampling and Testing

The organization shall establish and implement procedures for sampling and testing that ensure:

Routine sampling and inspection of input recycled materials and final products;

Verification of the classification of input material (e.g., post-consumer, post-industrial), based on documentary evidence and traceability system;

Testing of relevant physical and/or chemical properties of recycled input and final products shall be performed based on the intended use of the material in accordance to the EN 15347 requirements.

Maintenance of full material traceability, including correct documentation and labelling throughout processing;

Review and evaluation of test results and documentation to verify consistency, conformity, and compliance with the declared recycled content.

PART 3

REQUIREMENTS FOR THE CERTIFICATION PROCESS

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a. Product Certification Scheme of Metal Products Scheme

Certification is operated as Type 6 under EN ISO/IEC 17067. The distribution of conformity-assessment activities (Selection, Determination, Review, Decision, Attestation/Licensing, Surveillance)

[Table 1 – Product Certification Scheme of Recycled Plastic Content Scheme]

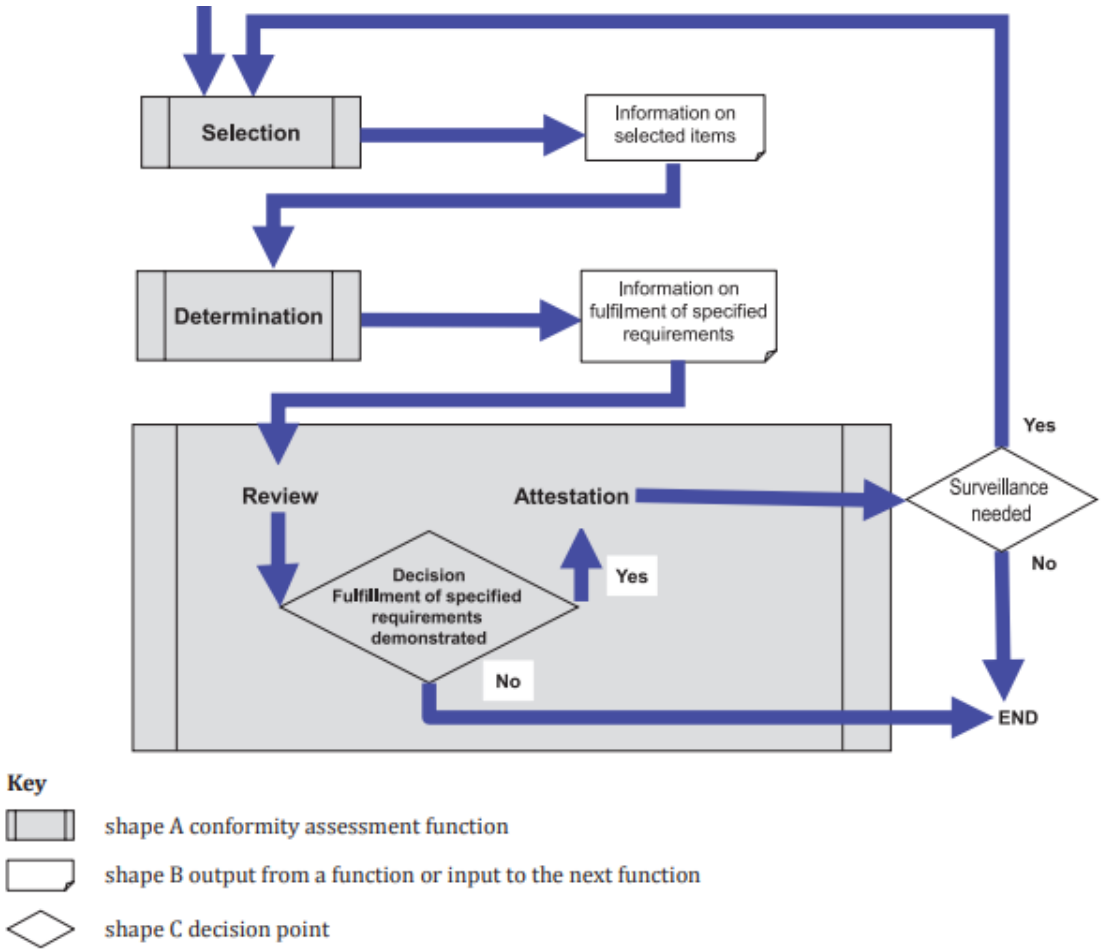
Conformity Assessment Roles and Activities in Product Certification Schemes		Product Certification Scheme Type (Type 6)
I	**Selection** (including planning and preparation activities, specification of requirements, e.g. normative documents, and sampling)	X
II	**Determination of characteristics,** as applicable, by: a) testing b) inspection c) design appraisal d) assessment of services or processes e) other determination activities, e.g. verification	X
III	**Review** (Examining the evidence of conformity obtained during the determination stage to establish whether the specified requirements have been met)	X
IV	**Decision on certification** (Granting, maintaining, extending, reducing, suspending, withdrawing certification)	X
V	**Attestation, licensing**	
	a) Issuing a certificate of conformity or other declaration of conformity (confirmation)	X
	b) Granting the right to use documents or other declarations of conformity	X
	c) Issuing a certificate of conformity for a batch of products	-
	d) The granting of the right to use the conformity marks (licencing) is based on a surveillance (VI).	X
VI	**Surveillance**	
	a) Performing tests or examination of samples from the market	-
	b) Performing test or inspection of samples from the factory	X
	c) Evaluation of production, service delivery or operation of	X

	the process	
	d) Management system inspections combined with random inspections	X

This scheme was validated by ATC International because of Type 6 of ISO/IEC 17067 is based on for implementation.

b. Functional Approach to Conformity Assessment

Figure.1: Functional approach to conformity assessment



Shape A in Figure.1 represents a conformity assessment function for Metal Products scheme. The specific activities in each function can vary from one type of conformity assessment to another, based on the needs of users, the nature of the specified requirements and the object of conformity assessment involved.

Shape B in Figure.1 represents output from a function and is also the input to the next function. The nature of the output varies, depending on the specific activities that have been undertaken.

Shape C in Figure.1 represents a decision.

c. Selection (Recycled Plastic Content Scheme)

In some cases, applicants may have already conducted testing, inspections, or traceability evaluations prior to applying for certification. When such results are presented as part of the conformity assessment, the following shall apply:

For traceability and chain-of-custody records, the Scheme Owner shall review documented material flows (including input, blending, and output stages) as per EN 15343, supported by supplier declarations, batch records, internal transfer documentation, and mass balance calculations.

All upstream documentation (e.g., recyclate origin, classification as post-consumer or post-industrial) shall be verifiable, and traceability shall be clearly demonstrated from input to final product.

For any testing activities relied upon (e.g., characterization under EN 15347 if required), the test results must originate from ISO/IEC 17025–accredited laboratories, governmental laboratories, or equivalent, and be relevant to the scope of certification.
The sampling and verification of traceability, and recycled content shall be evaluated during the initial audit, which shall include:

Review of the chain-of-custody system and mass balance records;

Physical inspection of input and output materials;

Audit of the internal procedures used for classification, storage, and segregation of recycled and virgin materials.

Where in-house or external laboratories are used (If applicable), their competence shall be demonstrated by:
On-site assessment of testing personnel, equipment, and methods (if applicable);

Evaluation of externally issued reports for relevance, method validity, and traceability;

Verification of the laboratory's accreditation (if applicable) to ISO/IEC 17025.

d. Competence

The competences required to conduct the activities of application review, audit team selection, audit planning activities and certification decision defined as below:

The certification activities under this Scheme shall be performed by qualified Lead Auditors meeting the following criteria. Given the nature of this Scheme, no separate technical expert is foreseen. All assessments are to be conducted by personnel with integrated competence in quality systems, recycled content calculation, and the EN 15343 framework.

Criteria for Lead Auditor:
The Lead Auditor responsible for conducting audits under the Recycled Plastic Content Scheme shall meet all the following criteria:

a) Has successfully completed either of the following internationally recognized auditor trainings:

ISO 9001 Lead Auditor Course, or ISO 14001 Lead Auditor Course, 40 hours training completed based on ISO 19011

b) Has successfully completed training on the requirements of EN 15343 and the Recycled Plastic Content Scheme of ATC International, including:
Chain of custody and traceability in recycled plastics,
Mass-balance and content-calculation rules,
EN 15347 testing requirements (Table 1 as mandatory, Table 2 where applicable),

c) Has a minimum of 20 audit man-days experience in auditing management systems, traceability systems, or production processes in the plastics, recycling, or materials processing sectors.

d) Holds at least a Bachelor's degree

e) Has completed EN ISO/IEC 17065 training, with emphasis on third-party product certification principles.

f) Demonstrates familiarity with quality-system approaches based on ISO 9001, including process-based auditing, risk thinking, and Plan-Do-Check-Act cycles.

Criteria for Application Reviewer:
The personnel responsible for reviewing certification applications and conducting application suitability assessments shall meet the following:

a) Holds a Bachelor's degree and minimum 1 year's work experiences.

b) Has completed training in EN ISO/IEC 17065 with emphasis on application review, impartiality, and risk assessment.

c) Has successfully completed internal training on the ATC International Recycled Plastic Content Scheme and EN 15343, including understanding the key certification criteria and audit flow.

d) Demonstrates familiarity with ISO 9001 or ISO 14001-based management system approaches.

Criteria for Decision Maker (Final reviewer):
The personnel responsible for final decision-making on granting, refusing, maintaining, suspending, or withdrawing certificates shall meet the following:

a) Has successfully completed training in either:

ISO 9001 Lead Auditor Course or ISO 14001 Lead Auditor Course,40 hours training completed based on ISO 19011

b) Holds a Bachelor's degree.

c) Has completed formal training on:

EN ISO/IEC 17065, and

EN 15343 and Scheme Rules of ATC International

d) Has a minimum of 20 audit man-days of relevant audit experience, and/or 2 years of documented work experience in quality assurance, certification, or production in the plastics, recycling, or material compliance sectors.

e) Demonstrates understanding of key risks related to chain-of-custody, traceability, and recycled-content claims, and is capable of assessing audit reports accordingly.

e. Application and Audit process

1. Application for Conformity Assessment and Contract

To initiate the conformity assessment procedure under the Recycled Plastic Content Scheme, the Applicant (manufacturer or an authorized representative) shall submit a formal Application Form, provided by ATC International. The information provided shall allow for a complete understanding of the organization's processes and its recycled material supply chain.

The Application Form shall include at least the following information:

The products for which certification is requested, including product names and corresponding main polymer types;

A short description of the main operational processes (e.g. recycling, blending, compounding, extrusion);

The standards and other normative documents applicable to the products under this scheme;

The physical locations and companies involved in each step of the recyclate-related activities (e.g. sourcing, storage, transportation, transformation, and packaging);

A breakdown of the scope of activity per site, including whether operations are conducted in-house or outsourced;

Identification of any subcontracted activities or legal entities involved in product manufacture or recycled-material management;

Identification of the sites where the products are produced and relevant contact persons;

Disclosure of the claimed recycled content ranges for each product or product family;

If applicable, a declaration of intent to use the Scheme Logo (subject to ≥10% verified recycled content);

Information on the traceability system and mass-balance model used (e.g. controlled blending, batch-level tracking).

A formal certification contract will be signed between ATC International and the applicant prior to the audit. The contract defined the responsibilities of both parties, the applicable scheme scope, and terms for surveillance, logo use, and withdrawal conditions.

2. Audit Duration

ATC International Scheme Manager or APP Reviewer shall calculate the audit time based on the information provided in the application form, considering the following rules:

a) The standard duration of an audit day is eight (8) hours.

b) Audit time calculations shall be documented by the APP Reviewer using the standard audit-duration table defined in the applicable program procedure, along with a justification for any adjustments based on the complexity of the operation.

c) Only actual on-site auditing time shall be considered; planning, travel, and reporting are excluded from audit-day totals.

d) Audit time applies only to qualified auditors, as defined in the competence criteria of this Scheme.

e) For each additional operational site (e.g., recycling facility, blending plant, compounding line), a minimum of 0.5 audit day shall be added. The exact time shall be evaluated based on:

Type and number of processes conducted at each site (e.g., sourcing, compounding, extrusion, storage);

Diversity of product families and recycled content claims;

Complexity of the traceability and chain-of-custody system;

Number of recyclate suppliers and extent of documentation verification needed;

Language needs or interpretation requirements, if applicable;

Number of main product lines or polymer types involved in the certificate.

f) The number of people in the audit team may vary according to the scope and volume of the activities audited. However, team size does not reduce or increase audit time.

g) Reduction in Audit Duration Based on QMS Certification

Where the organization holds a valid ISO 9001 Quality Management System certificate issued by ATC International, and the scope of the QMS significantly overlaps with the recycled-plastic content activities (e.g. material intake, traceability, production control), a reduction of up to 30% in audit man-days may be applied.

This reduction is conditional upon:

The QMS audit having been conducted by ATC International,

The QMS audit either being conducted concurrently with this Scheme audit, or having been conducted within a reasonable timeframe before the audit of this Scheme (to be determined by the APP Reviewer),

Sufficient evidence that QMS processes already evaluated cover key Scheme requirements (e.g., documentation control, monitoring, corrective action, and management review).

The final decision on the applicability and extent of the reduction shall be made by the APP Reviewer, based on risk and evidence presented in the application and QMS audit reports.

6. Planning and Managing Audits
(Initial Assessment – Recycled Plastic Content Scheme)

6-1 Audit Stages

#	Stage	Purpose
1	**Plan & programme**	Define audit scope, sites, processes, product families, recycled-content claims and sampling strategy.
2	**On-site audit**	Verify implementation of the chain-of-custody system, mass-balance calculations, supplier controls and EN 15343 / EN 15347 characterisation.
3	**Audit findings & reporting**	Record conformities, observations and nonconformities.
4	**Corrective actions**	Applicant submits a plan within 30 days; objective evidence of closure within 120 days.
5	**Verification & closure**	Lead auditor reviews evidence, may require follow-up visit for major issues.
6	**Decision making**	Decision Maker reviews the full file and issues, refuses or defers the certificate.

6-2 Purpose of the Initial Audit
To evaluate, on site, the effectiveness of the organisation's traceability and recycled-content management system and its conformity with EN 15343 and this Scheme's rules.

6-3 Documents, Records and Activities Reviewed
The audit shall cover at least:

Inbound recyclate controls – verification of supplier, classification (post-consumer / post-industrial), contamination checks and EN 15347 Table 1 characterisation records.

Chain-of-custody procedures – intake, storage, internal transfers, segregation, identification and labelling of recycled vs. virgin streams.

Mass-balance / controlled-blending calculations – spreadsheets or software proving the declared recycled-content percentages per product or product family.

Process controls – blending, compounding, extrusion or moulding parameters that could affect recycled content.

Finished-product verification – labelling, logo placement (≥ 10 % products only) and consistency with audited percentages.

Management of nonconforming material or mis-labelling incidents.

Customer complaints, corrective-preventive actions, internal audits, management review (PDCA evidence) and other needed about quality management system.
Awareness of staff involved in traceability and calculation tasks.

Laboratory competence (own or external) for any EN 15347 optional tests (if needed)

6-4 Product-Type Definition
Where the organisation groups products into families with common recycled-content claims, the audit team reviews the supporting evidence (product dossiers, data sheets, calculation worksheets) to confirm that grouping is technically valid and consistent with EN 15343.

6-5 Reporting, Certification & Publication
An Audit finding will submit at the end of the audit. Final Report is issued after verification of the findings by Lead auditor – one copy to the Decision Maker, one to the applicant.

Certificates carry a unique ID and are listed on the ATC International website.

Use of the Scheme Logo follows WI-06; logo is licensed only for products ≥ 10 % verified recycled content.

Scope extensions require a new application; the Scheme Manager decides whether a full or partial audit is needed.

7. Multiple Sites (Multi-Site Organizations)

In the Recycled Plastic Content Scheme, organizations operating multiple physical sites involved in the sourcing, handling, processing, blending, or storing of recycled plastics shall be assessed in an integrated but structured manner.

Each additional site shall be included in the certification scope only if it is audited as part of the assessment.

The following principles apply:

a) A minimum of 0.5 audit man-day shall be added per additional site, subject to adjustment based on the complexity, volume, and role of each site in the chain of custody.
b) Each site's contribution to the traceability system (e.g., sourcing, storage, blending, labelling) shall be clearly identified and documented.
c) The entire chain of custody must be demonstrable and operationally traceable across all sites.
d) A consolidated certificate may be issued to cover multiple sites, provided that:
- all sites operate under a common production control and traceability system,
- each site has been audited during the initial assessment or within the defined surveillance cycle, and
- audit findings for each site are clearly reported.

In cases where sites operate under independent quality or traceability systems, separate certification audits and certificates may be required.

8. Surveillance

8.1 Frequency & Scope
a) Certified organizations shall undergo at least one full on-site surveillance audit per year to maintain certificate validity.
b) The audit shall include all elements of the Scheme, including updated verification of:

supplier and input documentation,

mass-balance calculations,

internal process traceability, and

current recycled-content declarations.

c) Where multiple sites are involved, each site shall be included in the surveillance cycle. ATC International may define a rotation plan provided that no site remains unaudited for more than 24 months.

8.2 Purpose
The purpose of the surveillance is to:

Ensure ongoing compliance with EN 15343 and this Scheme.

Confirm that no changes have occurred in sourcing, traceability systems, or blending operations that may affect certified claims,

Verify the correct use of the Scheme Logos.

Ensure that nonconforming materials, mislabelled products, or improper blending practices are properly controlled and documented.

8.3 Surveillance Activities
The surveillance audit includes but is not limited to:

Review of input control and recyclate documentation

Recalculation or sampling check of recycled-content percentages

Verification of product labelling and logo placement

Review of complaints, nonconformities and corrective actions

Review of internal audits and management review

Evaluation of any changes to suppliers, materials, or internal processes

Interview of key staff involved in chain-of-custody and calculation

Review of sampling/testing (where Table 2 tests are used)

8.4 Nonconformities (Minor and Major) and Follow-Up
Nonconformities shall be communicated at the end of the audit.

The applicant shall submit a corrective action plan within 30 days and implement it within 120 days.

If the certificate expiry date is within 120 days, corrective actions must be implemented and submitted before that date.

Failure to resolve nonconformities in time may result in suspension or withdrawal of the certificate.

In case of major process changes or risk to traceability integrity, ATC International may require an unplanned audit or additional sampling/testing.

9. Follow-up Audits
Follow-up audits shall be conducted to verify the closure of:

Major nonconformities raised during initial, surveillance, or change audits;

Minor nonconformities that require on-site verification, such as issues with traceability, mass balance calculations, or recycled-content labelling.

The follow-up audit may cover the full scope of the original audit or only the parts affected by the nonconformities, at the discretion of the Lead Auditor or Scheme Manager.

The follow-up audit shall be performed by the same audit team, unless conflicts of interest, unavailability, or impartiality concerns necessitate otherwise.

Follow-up audits are scheduled in coordination with the client, once the applicant confirms readiness and submits supporting corrective-action documentation. If the applicant fails to complete preparations within the agreed timeframe, or fails to close nonconformities, the certification process may be cancelled.

For audits performed within 30 days of certificate expiry, the nonconformity resolution must be completed at least 7 days prior to expiry, to allow time for review and decision-making.

Once the auditor verifies closure of nonconformities, the complete audit file is submitted to the Decision Maker for final review.

10. Change Audits

Change audits are performed to evaluate significant changes that could impact the scope or validity of the certificate. These include:

Change of legal entity, company name, or ownership;

Change of product scope, such as new polymer types or product families;

Relocation or addition of manufacturing sites or recyclate handling facilities;

Substitution of major suppliers of material or processing subcontractors.

The organisation shall submit a Certificate Change Request Form detailing the nature and justification for the change. The Scheme Manager shall decide whether:

A document review is sufficient, or

An on-site audit is required.

Where an audit is conducted, it shall be completed using the standard forms and checklist, and the outcome documented in the Certificate Change Request Form.

If approved, the certificate is updated accordingly and re-issued. The validity date of the certificate remains unchanged. If the change request is rejected, the client shall be notified in writing with justification.

11. Short-Notice Audits

Short-notice audits are conducted outside the regular audit program, typically triggered by:

Complaints submitted with objective evidence, such as claims of false recycled-content declarations or misuse of the Scheme Logo;

Signals of possible fraud, mislabelling, or nonconforming product in the market;

Significant unreported changes in processes, suppliers, or traceability systems.

The Scheme Manager may decide to conduct a short-notice audit with a notification period of no more than 1 working day, to avoid giving the organisation time to alter or conceal the current situation.

During such audits, the team will review:

The subject and evidence of the complaint;

Results and records of prior audits;

Relevant corrective actions taken;

Any major changes to traceability, production, or material flows.

A different audit team from the previous audit shall be assigned, and it shall include at least one member experienced in recycled plastics and traceability audits.

If the client refuses to accept the audit, the certificate may be suspended by the Scheme Manager, and the client shall be formally notified in writing. This condition is included in the certification agreement signed by all applicants.

12. Unannounced Audits

ATC International reserves the right to conduct unannounced audits for any certified organisation in the following situations:

When a substantiated complaint has been received indicating a potential misuse of the Scheme Logo, false recycled content claims, or traceability system failure;

When there is evidence or suspicion of major changes in production, suppliers or inputs without notification;

As part of random risk-based verification or routine scheme integrity activities.

Additionally:

Certified organisations may voluntarily choose to replace planned surveillance audits with annual unannounced audits.

Recertification audits may also be performed unannounced, if formally agreed upon by the organisation and ATC International.

Unannounced audits may be off-site (document review) or on-site, depending on the nature of the concern and availability of real-time data.

The Scheme Manager shall ensure that such audits are conducted with minimum prior notice (maximum 24 hours)

and that impartiality and audit integrity are preserved.

13. Decision Based on Certificate Validity

Following any initial, surveillance, or follow-up audit, the assigned Decision Maker shall issue a formal decision on the status of the certificate, which may be:

Maintained (valid without restriction),

Suspended (temporarily inactive pending corrective action),

Withdrawn (revoked permanently due to unresolved nonconformities),

Reduced (scope or site coverage narrowed).

The Decision Maker's report shall be submitted to the Scheme Manager for final administrative approval.

If certification is suspended or withdrawn, the organisation shall be notified within 5 working days, and:

Must cease all claims of certification and logo use immediately,

For withdrawn shall return the original certificate within 7 working days,

May not refer to certified status during the suspension or withdrawal period.

The certificate may be withdrawn in the following situations:

Failure to implement agreed corrective actions within the required timeframe,

No evidence of active manufacturing activity for over 12 months,

Obstruction of scheduled surveillance audits,

Documented misuse of the certificate or Scheme Logo,

Violation of the certification contract or declaration of false information.

Organisations retain the right to appeal any decision by submitting a written request to the Appeals Committee, as per the ATC International Complaint and Appeal Procedure No 12.

14-Re-assessment and Renewal of Certification

The certificate issued under the Recycled Plastic Content Scheme shall remain valid for a maximum period of three (3) years, provided that all surveillance audits have been successfully completed and no unresolved major nonconformities remain.

Prior to expiry, a full re-assessment audit shall be conducted to evaluate continued conformity with:

* The requirements of EN 15343,
* This Scheme and its associated procedures,
* The organisation's traceability and content-calculation system,
* And any updated regulatory or scheme-specific obligations.

The re-assessment shall follow the same methodology and audit process as the initial certification audit, including review of all documentation, on-site verification, and sampling (as applicable). The scope of the certificate may be revised at this stage based on operational changes, product lines, or site modifications.

15. Certificate Suspension, Withdrawal or Reduction

15.1 Suspension

ATC International may suspend a certificate with immediate effect under any of the following conditions:

Identification of a critical nonconformity, including but not limited to:
- falsified data,
- unverified recycled content claims,
- improper use of the Scheme Logo;

Failure to respond to a corrective action request within the prescribed timeframe;
Refusal to undergo scheduled surveillance, follow-up or unannounced audit;
Voluntary suspension request by the organisation.

Suspension means the organisation must temporarily cease all reference to certification and logo use until the issue is resolved and verified.

15.2 Withdrawal

A certificate shall be withdrawn if:

a) The organisation fails to resolve suspension-related issues within six (6) months;
b) Major systemic breakdown in traceability or recycled-content calculation is confirmed;
c) ATC International determines that certification was issued based on misleading, false or omitted information;
d) The certified activities are no longer being performed (e.g., site closure, no production);

15.3 Scope Reduction

ATC International may reduce the scope of an organisation's certificate in cases where:

A site, product family, or process no longer conforms with the Scheme;
The organisation voluntarily removes part of its scope;
Nonconformities are limited to a specific location or activity.

16. Actions upon Suspension, Withdrawal, or Scope Reduction

When a certification decision results in suspension, withdrawal or scope reduction, ATC International shall:

1. Immediately update the certification status of the organisation in:
   – the internal certification register form,
   – the ATC International website (https://atcintlgroup.com),
   – and any third-party listings (e.g. PolyCert registry, if applicable);

2. Notify the organisation in writing within three (3) working days of the decision;

3. Require the organisation to:

Cease all reference to certification or the Scheme Logo (if suspended or withdrawn);
Return the physical certificate to ATC International within five (7) days of withdrawal;
Inform their customers and stakeholders appropriately;
Remove the certification mark from packaging, promotional material, and product labels (where applicable).

In case of scope reduction, the new certificate shall reflect the revised coverage. The previous certificate shall be considered invalid beyond the updated scope.

17. Certificate, Mark, and Logo Usage
All rules regarding the use of the Certificate, Scheme Mark, and Scheme Logo under the Recycled Plastic Content Scheme are subject to the provisions of Work Instruction 06 – Mark, Logo and Certificate Use.

In addition, the following conditions apply specifically to this Scheme:

The Scheme Logo may only be used on products, packaging, or promotional material if the product has ≥10% verified recycled plastic content, as confirmed by ATC International during the most recent audit.

The exact verified percentage (rounded to the nearest whole number) must be displayed directly below the logo, in the following format:
"Recycled Plastic Content: 100%"

ATC International EN 15343:2007

ATC INTERNATIONAL 100% Recycled Plastic Content

Products with <10% recycled content may be certified but are not eligible to display the Scheme Logo.

The use of any third-party logo (e.g., PolyCert Europe) is subject to met their requirements.

Misuse of the logo or misleading claims about certification shall be treated as a critical nonconformity and may result in suspension or withdrawal of certification.

For more information, please visit: https://atcintlgroup.com

18. Complaints and Appeals

a) All complaints and appeals related to audits, certification decisions, logo use, or certified organisations must be submitted via the Complaint and Appeals Form, available at:
https://atcintlgroup.com

b) All complaints will be formally recorded, investigated, and resolved in accordance with ATC International's documented procedure. Where applicable, corrective actions shall be implemented by the certified organisation.

c) The organisation shall cooperate with any investigation into complaints made against them and provide relevant documentation on request.

d) Records of all complaints, investigations, decisions, and outcomes shall be maintained for at least 10 years.

19. Documents and Records

This Scheme is subject to annual review by impartiality committee and then approve by a committee comprising the CEO, COO, Accreditation Manager, and Scheme Manager.

Updates to the Scheme shall be communicated to all affected parties (e.g., ABs, clients, audit teams) via official channels, including publication on:
https://atcintlgroup.com

The Scheme Owner is responsible for maintaining all records related to this Scheme, including:

Audit and certification records;

Sampling and test documentation;

Traceability files;

Complaints and appeals;

Scheme changes and communications.

These records shall be retained for a minimum of ten (10) years and made available to accreditation bodies and other competent authorities upon request.

REFERENCES

EN 15343:2007 – Plastics — Recycled Plastics — Traceability and assessment of conformity and recycled content
EN 15347:2007 – Plastics — Recycled Plastics — Characterisation of plastics wastes
EN ISO/IEC 17000 – Conformity assessment — Vocabulary and general principles
EN ISO/IEC 17065 – Conformity assessment — Requirements for bodies certifying products, processes and services
EN ISO/IEC 17067 – Conformity assessment — Fundamentals of product certification and guidelines for product certification schemes
ISO 9001:2015 – Quality management systems — Requirements (only referenced where applicable)
PolyCert Europe – Criteria for Accepted Audit Schemes (latest version applicable)
ATC International – Work Instruction 06: Mark, Logo and Certificate Use
ATC International – Program Procedure for Recycled Plastic Content Certification Procedure No 36
ATC International – Complaint and Appeal Procedure No 12

Document Revisions

Rev. No	Date	Description	Prepared	Controlled	Approved
00	20.01.2025	First Publication	Rasool Safarzadeh	Ümit Bucak	Rasool Safarzadeh