Overview of Application for APR Endorsement of PCR Certification Organizations

The Association of Plastic Recyclers (APR) is “The Voice of Plastics Recycling.” As the international trade association representing the plastics recycling industry, membership includes independent recycling companies of all sizes, processing numerous resins, as well as consumer product companies, equipment manufacturers, testing laboratories, organizations, and others committed to the success of plastics recycling. APR works to enhance quality and increase supply through technical resources, testing programs, design solutions, corporate training, regulatory leadership and education programs. APR strongly advocates the recycling of all postconsumer plastic packaging and promotes development of the plastics recycling industry by providing leadership for long-term industry growth and vitality that contributes to a circular economy.

To support and grow the use of postconsumer recycled plastics, APR understands that it is essential that certification of postconsumer resins (PCR) be viewed as reliable, consistent, and accessible by both producers and users of recycled plastic resins. As noted by the International Organization for Standardization (ISO), the value of a certification is the degree of confidence and trust that is established by an impartial and competent demonstration of fulfilment of specified requirements by the third party.

In response to a growing demand from its members and stakeholders across the plastics value chain, APR has established a process for endorsement of companies that provide third-party certification of PCR using the definition in ISO 14021:2016. APR members that receive certification may present it to be recognized by APR and listed on the APR website. California Senate Bill 270 creates standards that reusable bags distributed or sold in California must meet certain standards, including recycled content. Any plastic reclaimer’s PCR which has been certified under the State of California’s SB 270 requirements would be considered certified PCR by APR.

Through endorsement of PCR certification companies, APR seeks to:

- Provide members with confidence that endorsed certification companies adhere to a clear, consistent definition of PCR that aligns with the ISO 14021:2016 definition.
- Help “level the playing field” by endorsing multiple, credible PCR third-party certifying bodies that APR members and others can voluntarily utilize.
- Increase accessibility and confidence in certification that meets the needs of members across diverse PCR applications (e.g. olefins, other rigid plastics, flexible films, etc.).

Although this procedure may be followed to certify products in the future, APR is taking a phased approached and it is currently focused on certifying the source of pellet or flake PCR.

Through this endorsement program, APR ultimately seeks to increase PCR supply and demand of PCR plastics. APR will actively promote APR member companies with certified resin through webinars, website, articles, and other forms of media to reach an audience.
Application for APR Endorsement of Third-Party PCR Certification Companies

Organization Name: ___________________________________ Date: ________________________________

Website Address: ___________________________ Location: (City, State) _____________________________

Contact Name: ___________________________ Title/Role: ________________________________________

Telephone: ___________________________ Email: ____________________________________________

Quality Management System: (i.e. ISO17025, ISO17065, etc.) ______________________________________

Accreditation Organization and Certificate Number: ___________________________ Valid Until: ________

Please include a copy of your Quality Management System Accreditation Documentation showing certification number with submission of this application.

Description of Organization: Please provide information about your organization and its activities related to PCR plastics certification:

__________________________________________________________________________________________

Geographic Markets Covered: ________________________________________________________________

Experience with PCR certification for plastics:
Please describe any specific parameters, types of materials/products, or other specialized areas of expertise related to your organization’s certification activities for PCR plastics.

__________________________________________________________________________________________

Ground Rules for APR Endorsement of Third-Party PCR Certification:

1. APR does not certify PCR content, nor does it concur with a certifying organization but rather recognizes companies to conduct the certification process.
2. APR does not adjudicate “percentage of PCR content” disagreements.
3. APR specifically states that APR membership is not a requirement for either the certifying organization or the party for whom the certification is sought.
4. APR does not collect a fee from the company seeking certification of postconsumer content or from the endorsed certifying organization.
5. APR attests that all information provided through this application process will remain confidential.
6. Use of names and/or logos by either APR or the endorsed certifying organizations need to be mutually agreed upon by both parties in writing.
Conditions of APR Endorsement of Third-Party PCR Certification Companies

1. For endorsement, certifying organizations must adhere and certify to the following definition for PCR (ISO 14021:2016 Section 7.8.1.1).
   a. **Postconsumer Recycled Content** means material generated by households or by commercial, industrial and institutional facilities in their role as end-users of the product which has been used for its intended use or can no longer be used for its intended purpose. This includes return of material from the distribution chain.

2. For endorsement, certifying organizations will use the following definition for post-industrial resin.
   a. **Post-Industrial Recycled (PIR) Content**: Material diverted from the waste stream during a manufacturing process. Included as PIR and excluded as PCR is reutilization of materials such as rework, regrind or scrap generated in a process and capable of being reclaimed with the same process that generated it.

3. Organizations will use the following guidelines in certifying PCR:
   a. **Overview**
      i. A mass balance analysis will be conducted of all material flows within the recycling facility to ensure enough PCR raw materials were purchased and used in production to consistently meet the recycled content claims within the certification period.
      ii. There will be an evaluation of the source of the recycled raw materials to ultimately determine the total percent (by weight) of the PCR being used to manufacture the product.

   b. **Required Documentation**: The certifying company will use at least six months of data, preferably twelve months, from the past year that clearly describes and includes:
      i. Recipe and documentation for recycled content materials detailing the amount and type of raw materials used to manufacture the material (percent by weight basis).
      ii. Total production of specified material, during the period being examined.
      iii. Documentation of recycled content material suppliers including the material provided, the quantity of the material supplied, and the amount of PCR in each material.
      iv. An address, name of responsible person and contact information for each of the recycled content material suppliers to enable an audit and certification of their claims and verify the PCR designation.
      v. Any information of supplier variability including frequency of change in suppliers, changes in source location of recycled content material, etc.
      vi. Purchasing documentation for the recycled content materials which contain data clearly describing existing plant inventory, production, and shipping information along with invoices to match.

   c. **Mass Balance**: Upon receiving initial data, the certifying company will conduct a mass balance analysis of all material flows within the recycling facility to ensure enough recycled content raw materials were purchased and used in production to consistently meet the recycled content claims within the product recipe for the certification period.
d. **Recycled Content Calculations** - The certifying company will:
   i. Conduct a review of the actual bill of material/recipe for the specified recycled content product,
   ii. Verify the pre-and post-consumer designations of the raw materials through supplier interviews and a documentation collection and verification process and
   iii. Validate the total amount of PCR content (on a percent by weight basis) within each constituent within the final product/material.

e. **Annual Recertification Process**: All certified claims are recertified annually for the certifying company to evaluate any changes within the product, operations, or recycling processes to ensure continued compliance with the established criteria.

f. **Site Audit** - The certifying company can:
   i. Conduct a site visit and audit of the manufacturer’s/recycler’s facility and suppliers (suppliers as deemed necessary) to audit and verify the material utilization and material flows within the manufacturing/recycling process,
   ii. Conduct interviews with representatives at the facility as part of the audit process as well as review any additional data needed to complete the recycled content certification,
   iii. Walk through the facility to confirm quality control procedures and/or SOPs that define good manufacturing practices when handling recycled content production,
   iv. Assess inventory control and segregation for inventory of finished product which contains certified recycled content material,
   v. Conduct a visual inspection and collect photo documentation to verify the recycled content materials being used within the process to manufacture the products and
   vi. Conduct a detailed review of documentation and chain of custody records of material flows during the site visit.

4. **Technical Support Group**: APR will establish a five-member Technical Support Group comprised of representatives from an APR Plastic Reclaimer, a brand owner, the EPA, an APR Endorsed Certifying company and an APR Board member to arbitrate issues of concerns with this program.

5. The organization must be accredited and in good standing as a certifying body for PCR and use those standards in certifying PCR under this program. Proof of up-to-date accreditation must be included with this application.

6. APR endorsement of PCR certifying organizations is at-will and is valid for three years, with the stipulation that the accreditation certificate is maintained, at which point the certifying organization may choose to re-apply with APR.
(certifying organization) hereby pledges to abide by the standards and expectation listed above to maintain APR endorsement of my organization for PCR certification.

Qualified Representative of Certifying Organization                  Date

The Association of Plastic Recyclers, APR, recognizes that (certifying organization), satisfies all requirements listed in the Application for APR Endorsement as a Third-Party Post-Consumer Recycled Content (PCR) Certifier and hereby so states.

(certifying organization) will be listed on the APR website as a recognized certifying organization for attesting to post-consumer content per ISO 14021:2016.

APR recognition continues for three years from the date of presentation of this certificate or until (certifying organization) informs APR it no longer offers such a certifying service, or no longer meets the requirements above.

Steve Alexander, President/CEO of APR                  Date
Application for APR Endorsement of Third-Party PCR Certification Companies Addendum

The experience of APR has shown that the non-binding examples below should be considered post-consumer recycled content per the ISO 14021:2016 definition as material that is generated by household, commercial, industrial and institutional end-users and that was used (or no longer can be used) for its intended purpose. While these examples have not been formally adopted or endorsed by ISO, they are offered as expert guidance for voluntary use by third party certifiers.

i. Plastic bottles and containers emptied by persons as the product is consumed
ii. Retail plastic bags filled at check-out and emptied at homes
iii. Items purchased by consumers and otherwise destined to be placed into disposal
iv. Plastic items purchased by a party, discarded into the environment, and collected from the environment for recycling
v. Crates, buckets, totes, drums, etc. emptied by businesses as the consumer and otherwise destined to be placed into disposal
vi. Retail hangers
vii. Plastic strapping removed from shipping containers in a commercial setting
viii. Agricultural scrap film, boat wrap, car wrap
ix. Containers of product filled, shipped and subsequently scrapped in or returned from the distribution chain for being out of date or damaged
x. Plastic items intended for retail sale that are cleaned up after a transportation spill, such as a truck wreck of a load of water-soaked food containers
xi. Plastic food containers used in bakeries to hold bulk foodstuffs used to produce baked goods.
xii. Plastic foam, film and/or wrap used to protect goods during shipping
xiii. Material returned from the distribution chain from the end-users

Examples NOT considered to be acceptable as Post-Consumer Recycled Content:
i. Post-industrial recycled resin includes materials and by-products generated from, and commonly reused within, an original manufacturing and fabrication process
ii. Any failed manufactured items that are otherwise considered pre-consumer, post-industrial, or regrind material
iii. Production scrap from making bottles, tubs, buckets, or thermoforms
iv. Containers of product scrapped for faulty labels within the manufacturing location
v. Scrap sold or represented as ‘repro’, post-industrial reprocessed material