P.W. Foliarex Spółka z o.o. AUDIT REPORT

RECYCLED PLASTICS TRACEABILITY CERTIFICATION

RECYCLED PLASTICS

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1. SUMMARY SHEET

1.1 INFORMATION

Legal name of the organisation:	P.W. Foliarex Spółka z o.o.
Registered office address	
Street, n°:	ul. Bukowska 5
Postal code:	PL 62-060
City:	Stęszew
Country:	Poland
Address of the audited process or operation	
Street, n°:	ul. Bukowska 5
Postal code:	PL 62-060
City:	Stęszew
Country:	Poland
Type of process or operation:	Converting, trading
Type of products:	Packaging film on rolls
Origin, source (and type) of material:	Post-consumer, household, commercial, packaging, LDPE film

1.2 STATEMENT OF CONFORMITY

The certification holder's process has been assessed in accordance with the Audit Scheme V2.1, in line with EN 15343:2007 and has the required procedures in place in order to maintain traceability of the declared share of recycled plastics in products listed in this Audit Report following a controlled blending chain of custody approach.

The company fully complies/or not with the requirements of the RecyClass Recycled Content Traceability Certification.

1.3 LIST OF CERTIFIED PRODUCTS

Note for Certification Bodies: Any additional information regarding the origin or source of the Recycled Input may be added here.

Product code	Product name	Pre- consumer share (%)	Post- consumer share (%)	Other information
Twwww*tttt BA80	PCR 80%PF (Post-Consumer Regranulate 80% Packaging Foil) T – film foil, tttt –thickness film, wwww – width film	0%	80%	Different size and thickness
Twwww*ttttJ BA80	PCR 80%PF (Post-Consumer Regranulate 80% Packaging Foil) T – film foil, tttt –thickness film, wwww – width film, J - ionization film	0%	80%	Different size and thickness

Twwww*ttttA BA80	PCR 80%PF (Post-Consumer Regranulate 80% Packaging Foil) T – film foil, tttt –thickness film, wwww – width film, A - printed film	0%	80%	Different size, thickness and colour
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Zwwww*tttt*xxx*llll BA80	PCR 80%PF (Post-Consumer Regranulate 80% Packaging Foil) Z – overlap film, tttt –thickness film, wwww–width film, xxx–width overlap film, llll – length	0%	80%	Different size, thickness and colour
Kwwww*tttt*xxx*llll BA80	PCR 80%PF (Post-Consumer Regranulate 80% Packaging Foil) K – hood film, tttt –thickness film, wwww – width film, xxx – width overlap film, llll – length	0%	80%	Different size, thickness and colour

Wwwww*tttt*xxx*llll BA80	PCR 80%PF (Post-Consumer Regranulate 80% Packaging Foil) W – bag film, tttt –thickness film, wwww – width film, xxx – width overlap film, Illl – length	0%	80%	Different size, thickness and colour
Twwww*tttt RC50	PCR 50%PF (Post-Consumer Regranulate 50% Packaging Foil) T – film foil, tttt –thickness film, wwww – width film	0%	50%	Different size and thickness
Twwww*ttttJ RC50	PCR 50%PF (Post-Consumer Regranulate 50% Packaging Foil) T – film foil, tttt –thickness film, wwww – width film, J - ionization film	0%	50%	Different size and thickness
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Pwwww*ttttZ RC50	PCR 50%PF	0%	50%	Different size,

	(Post-Consumer Regranulate 50% Packaging Foil) P - half-sleeve film, tttt –thickness film, wwww – width film, Z - overlap film			thickness and colour
Zwwww*tttt*xxx*llll RC50	PCR 50%PF (Post-Consumer Regranulate 50% Packaging Foil) Z – overlap film, tttt –thickness film, wwww–width film, xxx–width overlap film, llll – length	0%	50%	Different size, thickness and colour
Kwwww*tttt*xxx*llll RC50	PCR 50%PF (Post-Consumer Regranulate 50% Packaging Foil) K – hood film, tttt –thickness film, wwww – width film, xxx – width overlap film, llll – length	0%	50%	Different size, thickness and colour
Wwwww [*] tttt [*] xxx [*] llll RC50	PCR 50%PF (Post-Consumer Regranulate 50% Packaging Foil) W – bag film, tttt –thickness film, wwww – width film, xxx – width overlap film, llll – length	0%	50%	Different size, thickness and colour
Twwww*tttt RC30	PCR 30%PF (Post-Consumer Regranulate 30% Packaging Foil) T – film foil, tttt –thickness film, wwww – width film	0%	30%	Different size and thickness
Twwww*ttttJ RC30	PCR 30%PF (Post-Consumer Regranulate 30% Packaging Foil) T – film foil, tttt –thickness film, wwww – width film, J - ionization film	0%	30%	Different size and thickness
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Zwwww*tttt*xxx*llll RC30	PCR 30%PF (Post-Consumer Regranulate 30% Packaging Foil) Z – overlap film, tttt –thickness film, wwww–width film, xxx–width overlap film, IIII – length	0%	30%	Different size, thickness and colour
Kwwww*tttt*xxx*llll RC30	PCR 30%PF (Post-Consumer Regranulate 30% Packaging Foil) K – hood film, tttt –thickness film, wwww – width film, xxx – width overlap film, llll – length	0%	30%	Different size, thickness and colour
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Twwww*tttt RC20	PCR 20%PF (Post-Consumer Regranulate 20% Packaging Foil) T – film foil, tttt –thickness film, wwww – width film	0%	20%	Different size and thickness
Twwww*ttttJ RC20	PCR 20%PF (Post-Consumer Regranulate 50% Packaging Foil) T – film foil, tttt –thickness film, wwww – width film, J - ionization film	0%	20%	Different size and thickness
Twwww*ttttA RC20	PCR 20%PF (Post-Consumer Regranulate 50% Packaging Foil) T – film foil, tttt –thickness film, wwww – width film, A - printed film	0%	20%	Different size, thickness and colour
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1.4 AUDIT INFORMATION

RecyClass Certification Code:	RC0026-FLX-10-23-AML-AK
Type of audit:	Monitoring Certification
Year of initial audit:	2021
Date of the on-site audit:	21.10.2022
Period of evaluation:	[21/10/2021]to [20/10/2022]
Period of validity:	[22/10/2022]to [21/10/2023]
Date of the Audit Report:	[31/10/2022]

1.5 CERTIFICATION BODY

Issuing Certification Body:	Certification Body logo:
Almaland Spółka z o.o.	% almaland
Name of the auditor (assessment):	Name of the auditor (reviewer):
Marcin Konopczyński	Aldona Konopczyńska

1.6 CERTIFICATION HOLDER CONTACT DETAILS

Registered office contact:				
Title:	Mr			
Name:	Łukasz Borowiak			
Position:	Board Member for Production and Trade			
Email:	lukasz.borowiak@foliarex.com.pl			
Audited process or operation contact:				
Title:	MS			
Name:	Anna Maziec			
Position:	Quality Manager			
Email:	anna.maziec@foliarex.com.pl			

2. PURPOSE OF THE AUDIT

RecyClass Recycled Content Traceability Certification recognises the use of recycled plastics in products via a third party verification. The audit focuses on certified streams of recycled material and their chain of custody as they move through the value chain following a controlled blending approach as described in ISO/IEC 22095.

3. AUDIT ORGANISATION

This Audit Report is based on an appointment which took place on 21/10/2022 from 08:30 to 15:00 at the plant in Steszew PL (the date was agreed upon with the customer). The following persons participated in the audit:

Certification holder personnel involved in the audit:			
Title:	Mr		
Name:	Łukasz Borowiak		
Position:	Board Member for Production and Trade		
Email:	lukasz.borowiak@foliarex.com.pl		
Title:	MS		
Name:	Anna Maziec		
Position:	Quality Manager		
Email:	<u>anna.maziec@foliarex.com.pl</u>		
Title:	MS		
Name:	Agata Pilarczyk		
Position:	R&D Specialist		
Email:	<u>agata.pilarczyk@foliarex.com.pl</u>		

4. SUMMARY OF THE AUDIT FINDINGS

Foliarex Spółka z o.o. is 30 years of experience in the production of packaging, construction and gardening films. Responding flexibly to changing market needs, constantly expands product range. The quality has been confirmed by ISO certificates.

The company, established in 1990 in Poznań, for the first years of its activity specialised in the production of packaging films. Its dynamic development is reflected in the exceptionally wide range of construction foils, foils used in agriculture, horticulture and in packaging sectors, as well as plastics and regranulates.

The production plant located in Steszew has production capacity of processed polyethylene. Today's position the company owes to its innovation and flexibility, the speed of response to signals from the market and the commitment of employees who improve the quality of products.

The most popular products includes multilayer packaging and heat shrink films. The films can be enriched with prints made on the individual request. Foliarex's latest investment is the launch of one of the most advanced five-layer film production line. This innovative technology can be used in almost every branch of the flexible packaging industry, allowing to meet advanced market requirements.

Basic parameters of the packaging film:

- width from 130 mm to 6000 mm

- thickness from 0.015 mm to 0.300 mm

Packaging films are being produced in 3-layer technology and allow surface printing. The packaging films are characterized by the following technical parameters:

mechanical parameters appropriately adjusted for the application;

the possibility of producing two-colour films – optional;

the possibility of producing film from certified regranulate meeting the requirements of EuCertPlast.

Basic parameters of shrink wraps:

width from 150 mm to 60000 m, thickness from 0,018 mm to 0,250 mm

The films produced can be marked with a print informing about the type of raw material which the packaging was made of, it can contain safety information or the client's individual print.

To meet customer requirements, we use various types of additives in production, such as: slip, anti-static, UV, pigments, etc.

Films from this group are offered in the form of: sleeves, sleeves with folds, half-sleeves, tapes.

5. AUDIT FINDINGS

SECTION 1: QUALITY SYSTEM REQUIREMENTS

1.1 BUSINESS REGISTRATION

Audit Findings:

Business, operating – company registered in the National Register of Court under number KRS 0000096013, permitted to legal activity on the market. Information exported from Register of Entrepreneurs, indicating the top management of the company, and the scope of activity.

1.2 QUALITY MANAGEMENT SYSTEM

Audit Findings:

Management team composed with qualified persons.

There is a documented management system for the group of products and process which is subject to RecyClass Certification. This system follows the main principles of ISO 9001:2015. The recycler has a valid certificate for PN-EN ISO 9001:2015-10 issued by Polskie Centrum Badań i Certyfikacji SA in 8/11/2021. Certification Body is accredited according to ISO 17021. The associated report ensured that the conformity assessment results are related to the products and processes subject to certification.

1.3 TRAINING

Audit Findings:

A training plan prepared at the beginning of each year and updated on an ongoing basis as new needs arise. Additionally Quality personnel participate systematically in RecyClass monthly "Unwrapped" webinars. The training procedure includes: training plan, training report and training effectiveness analysis. Documentation analyzed, complete and up-to-date.

1.4 REGISTER OF COMPLAINTS

Audit Findings:

Foliarex has developed and implemented the complaints procedure to guarantee that any complaints are considered and assessed . The complaints are monitored.

Complaints are forwarded to the sales department. Responsible person creates a record in the system. Automatically, all documents related to this production batch are attached as attachments. It is possible to fully identify when and from what components the batch was produced. Each case must find a final record - who and how solved the problem. The procedure defines what action must be taken to prevent future non-compliance. During the audit, one example of how to proceed with the non-compliance reported by the client was fully checked. Additionally, there is an internal complaint system where you can track all corrective actions taken.

1.5 RECORDS

Audit Findings:

The digital register of complaints is available. A separate register of complaints is kept for the supply of raw materials (including regranulate), and separately for products - PE foil. There is a designated person responsible for handling complaints and monitoring the implementation. Complaints are assessed by the Quality Department. The results are reviewed.

1.6 QUALITY ASSURANCE

Audit Findings:

All purchased material is checked for the quality. Visual inspection and check against the order. There are records of the inspection results. There is laboratory testing of the incoming material and the products. If there is any doubt as to the quality of the sample material, delivery is waiting, until the doubts are explained or the complaint procedure will take place.

Each batch of purchased regranulate is checked for the quality. Quality tests for sample, composed with:

colour, gasification, shape of granule, size of granule, smell and MFI.

Mandatory quality control is carried out during production - once every 2 hours. Information on the control of individual stages of production appears in the documents: "Production orders" and "Quality control register". After the end of the production batch, a "Test Report" is generated. All the studies collected on an annual basis are collected in the "Register of Test Reports".

1.7 COMMUNICATION ABOUT CONFORMING PRODUCTS

Audit Findings:

During the period of evaluation, the verified company used the comunication about conforming product in an appropriate manner and in accordance with the rules. Each stage - delivery, storage, marking of production and the final product, clearly marked and in accordance with the adopted design declared during the audit.

SECTION 2: SUPPLIER EVALUATION

2.1 SUPPLIER IDENTIFICATION

Audit Findings:

The plant is supplied with LDPE regranulates. All (100%) of regranulates supplied and used for the production of packaging film are EuCertPlast certified. There is a system in place that documents information on the suppliers of recycled plastics. The data entered into the system contains information about the recycled input supplier and the parameters of the delivered material. Each delivery of recycled input contains a complete set of documents, including the specification of the recycler. Recycled input provided as described and characterized. In the documents of each recycled input delivery there is a copy of the EuCertPlast certificate with a report. The certificate and report were checked during the audit in terms of validity and recycled content (ANNEX 4).

Purchasing documentation of Certified Recycled Input checked and verified. Documentation composed with:

- supplier documents - quality specification, sales documents with big-bag numbers assigned by the supplier and transport documents, weight receipts.

- recipient's documents - order from the sales department, control verification of laboratory tests, acceptance of recycled input into the system (each big bag gets its own separate QR code).

Testing of samples confirmed compliance with the "Raw material specification sheet". All records in the system are complete and legible.

2.2 INPUT RECORDS

Audit Findings:

All deliveries (including certified regranulate) registered in the operating system supporting the management. The data characterizing individual deliveries are: delivery date, weight, origin and name of the raw material. Each big-bag with delivered regranulate receives an individual label with an index of the raw material and a QR code. The system collects and allows access to the regranulate certificate, packing list of delivery, and physical and chemical test reports for each delivery.

SECTION 3: INPUT REQUIREMENTS

3.1 PURCHASE SPECIFICATIONS

Audit Findings:

At the beginning of the year, each supplier receives and confirms acceptance of the "Raw Material Specification Sheet". It is a form of an extensive purchase specification. It defines the parameters that the supplied regranulate must meet. Each delivery is verified against the "Raw Material Specification Sheet".

3.2 WEIGHTS AND DATES OF DELIVERY RECORDED

Audit Findings:

Incoming Recycled Input is recorded based on the weight receipt of the recycler. Additionally, selected big-bags are randomly weighed in order to check the correctness of the balance. Delivery data stored in the system: date, supplier, weight.

3.3 ORIGIN, SOURCE AND TYPE OF RECYCLED INPUT

Audit Findings:

According to EuCertPlast Incoming Regranulate Certificate:

- The origin of each shipment of recycled input is known 100% Post Consumer
- Source of each shipment of recycled input is known household 40,47%, commercial/ 59,53%/ industrial 0,00%
- Type of each shipment of recycled input is known packaging

DSECTION 4: STOCK MANAGEMENT

4.1 STOCK IDENTIFICATION

Audit Findings:

Internal identification with labels on big bags with regranulate. The label contains delivery data and a QR code that allows direct entry into the system and warehouse and production records.

Each batch of recycled input delivered to the plant is stored in a designated place and is easily identifiable by the label

4.2 STORAGE CONDITIONS

Audit Findings:

Storage of recycled input under appropriate conditions. Big bags are secured with a foil hood. Stock of incoming input partially covered, partially uncovered. A separate covered stock for finished products.

4.3 STOCK MANAGEMENT SYSTEM

Audit Findings:

A stock management system linked directly to the production management system. The system describes in detail all inputs and outputs of stock at all the time.

The individual order numbers describe the production batch for which each recycled input big bag was used.

The system enables the transition to the finished products stock by linking the product batch with the production and the stock of collected recycled input

The stock system built on the basis of the regranulate stock before production and the regranulate stock released for production. Regranulates directed to production according to the demand. The management of the stock in the system based on the software allows for all analyzes for the evaluation period.

4.4 STOCK CHECKS

Audit Findings:

Stock checks organized once a week. A report is created from the action. All reports available

SECTION 5: PROCESS

5.1 PROCESS OVERVIEW

Audit Findings:

A process control was carried out during the on-site audit. Additionally, the documentation was checked and all stages of production were discussed with the appropriate personnel.

The production process consists of several stages:

- preparation of the order recipe in accordance with the client's expectations production order,
- preparation of the composition taking ingredients from the stock,
- introducing the recipe to the production line management software,
- production blown film in the appropriate size, colour and thickness. The foil is wound on rolls.
- finished product stock ready to distribute.

At each stage of production, quality controls are carried out on both the input used and the finished product out

5.2 INCOMING RECYCLED INPUT RECORDS

Audit Findings:

During the on-site audit, all deliveries of recycled input in the period of evaluation were carefully checked. In the period of evaluation, deliveries of recycled input came from one supplier from one recycling plant and all were EuCertPlast certified deliveries. All deliveries were 100% Post Consumer regranulates. Each delivery has incoming load report and its own unique number, which is entered into the system via the QR code. All pick-ups from the stock and the production process controlled by a fully traceable system.

5.3 SUBCONTRACTING PROCESSING INPUT RECORDS

Audit Findings:

No subcontracting in production process

5.4 INPUT & OUTPUT RECORDS

Audit Findings:

The system collects data from the entire period of evaluation. The data enables detailed analysis and access to data for each product index as well as for the specific ingredients used in production. To calculate the volume of whole process for the period of evaluation, the electronic system and paper documentation generated all data for the each month of evaluated period and archival documentation were presented, that were:

To calculate the mass balance for the period of evaluation, the electronic system generated all data for the every month of evaluated period and archival documentation were presented.

- Stock volume – regranulate - for 20/10/2021 – electronic;

- Incoming regranulates in period 21/10/2021 – 20/10/2022 – digital register from the weight bridge system, stock data, and paper documents (transport documentation, waste documentation, reports);

- Stock volume for regranulate 21/10/2022 digital register;
- Register of waste register of waste, by the EWC code, day of service;
- Register of by-products register of sale, transport documentation;
- Register of sale in period 01/09/2021 31/08/2022 digital register from the system, stock data

For every produced index of products two samples were checked in detail (all together 8 samples). System generated the detail information about each production batch, consist with:

- Used recycled inputs,
- Additives, masterbatches
- Virgin PE input
- Output final product
- Rejections

5.5 PROCESS RECORDS

Audit Findings:

Production records are available for the last period of evaluation.

The system collects all information related to the production batch.

Each production batch contains the following information:

- "recycled input load report",

- "order from the customer" for a product - described basic parameters of the order, including the quantity to be produced,

- "index" - informs about the production technology - information from the production department,

- "Production order" - defines the recipe to be used, contains an "index" that describes the content of PC regranulate and the planned quantity of the product to be produced. The document contains a QR code that directs you to any information in the system.

"Production report" - filled in by the machine operator. The document contains a QR code that directs you to any information in the system. The QR code also allows you to link the order number with the number of the final product.

After production, the product is weighed - data to the system.

A "shipping specification" is created - which describes the product ready for sale.

The plant declares the production of foil in one technology - according to a specific recipe. The offer includes various forms of the product: tape, hood, sleeve etc. Tape production was tested during the on-site audit

5.6 METROLOGY OF TEST EQUIPMENT

Audit Findings:

Control and measurement tools are calibrated in accordance with the manufacturer's instructions. Each control and measurement unit has an instrument control label. The calibration and calibration register is on-site and available. All device tests are carried out in accordance with the procedure under the ISO system

5.7 VOLUME RECONCILIATION

Audit Findings:

During the on-site audit the volume reconciliation for PCR20%, PCR30%, PCR50% and PCR80% was performed and documented. For every recipe two samples were checked in detail. The quantities of output products with a certain percentage of recycled plastics correspond to the input material used, taking into account the losses incurred during the process or operation. The volume reconciliation for the process for the previous 12 months. In period of evaluation, 31 production batches were performed. During on-site audit the 8 production batches were checked in detail. The results of detail check below:

	Production batch nr 1	; Product name:	PCR 20% PF -	Post-Consumer	Regranulate I	Packaging Foil
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INPUTS				
Certified Regranulate EuCertPlast – 100% PC	14,00	27,45%		
Non Certified Regranulate	-	0,00%		
Summary Recycled input	14,00	27,45%		
Virgin input	35,00	68,63%		
Pigment	-	0,00%		
Masterbatches	2,00	3,92%		
Summary Inputs	51,00	100,00%		

OUTPUTS				
Foil	51,00	100,00%		
By-products, cut-offs, agglutinations	-	0,00%		
Summary Outputs	51,00	100,00%		

Production batch nr 2; Product name: PCR 20% PF – Post-Consumer Regranulate Packaging Foil

INPUTS				
Certified Regranulate EuCertPlast – 100% PC	15,00	23,81%		
Non Certified Regranulate	-	0,00%		
Summary Recycled input	15,00	23,81%		
Virgin input	47,40	75,24%		
Pigment	-	0,00%		
Masterbatches	0,60	0,95%		
Summary Inputs	63,00	100,00%		

S	
63,00	100,00%
-	0,00%
63,00	100,00%
	S 63,00 - 63,00

Production batch nr 3; Product name: PCR 30% PF – Post-Consumer Regranulate Packaging Foil

INPUTS				
Certified Regranulate EuCertPlast	103,00	31,89%		
Non Certified Regranulate	-	0,00%		
Summary Recycled input	103,00	31,89%		
Virgin input	213,00	65,94%		
Pigment	-	0,00%		
Masterbatches	7,00	2,17%		
Summary Inputs	323,00	100,00%		

OUTPUTS			
Foil	306,00	94,74%	
By-products, cut-offs, agglutinations	17,00	5,26%	
Summary Outputs	323,00	100,00%	

Production batch nr 4; Product name: PCR 30% PF – Post-Consumer Regranulate Packaging Foil

INPU	ГS	
Certified Regranulate EuCertPlast – 100% PC	386,00	30,30%
Non Certified Regranulate	-	0,00%
Summary Recycled input	386,00	30,30%
Virgin input	798,00	62,64%
Pigment	74,00	5,81%

Masterbatches	16,00	1,26%
Summary Inputs	1 274,00	100,00%

OUTPUTS			
Foil	926,00	72,68%	
By-products, cut-offs, agglutinations	348,00	27,32%	
Summary Outputs	1 274,00	100,00%	

Production batch nr 5; Product name: PCR 50% PF – Post-Consumer Regranulate Packaging Foil

INPUTS				
Certified Regranulate EuCertPlast – 100% PC	265,00	52,68%		
Non Certified Regranulate	-	0,00%		
Summary Recycled input	265,00	52,68%		
Virgin input	226,00	44,93%		
Pigment	-	0,00%		
Masterbatches	12,00	2,39%		
Summary Inputs	503,00	100,00%		

OUTPUTS				
Foil	498,00	99,01%		
By-products, cut-offs,				
agglutinations	5,00	0,99%		
Summary Outputs	503,00	100,00%		

Production batch nr 6; Product name: PCR 50% PF – Post-Consumer Regranulate Packaging Foil

INPUTS		
Certified Regranulate EuCertPlast – 100% PC	38,00	55,07%
Non Certified Regranulate	-	0,00%
Summary Recycled input	38,00	55,07%
Virgin input	28,00	40,58%
Pigment	-	0,00%
Masterbatches	3,00	4,35%
Summary Inputs	69,00	100,00%

OUTPUTS		
Foil	49,00	71,01%
By-products, cut-offs, agglutinations	20,00	28,99%
Summary Outputs	69,00	100,00%

Production batch nr 7; Product name: PCR 80% PF – Post-Consumer Regranulate Packaging Foil

INPUTS		
Certified Regranulate EuCertPlast – 100% PC	37,00	84,09%
Non Certified Regranulate	-	0,00%
Summary Recycled input	37,00	84,09%
Virgin input	7,00	15,91%
Pigment	-	0,00%
Masterbatches	-	0,00%
Summary Inputs	44,00	100,00%

OUTPUTS		
Foil	44,00	100,00%
By-products, cut-offs, agglutinations	-	0,00%
Summary Outputs	44,00	100,00%

Production batch nr 8; Product name: PCR 80% PF – Post-Consumer Regranulate Packaging Foil

INPUTS		
Certified Regranulate EuCertPlast – 100% PC	87,00	82,08%
Non Certified Regranulate	-	0,00%
Summary Recycled input	87,00	82,08%
Virgin input	18,00	16,98%
Pigment	-	0,00%
Masterbatches	1,00	0,94%
Summary Inputs	106,00	100,00%

OUTPUTS		
Foil	106,00	100,00%
By-products, cut-offs, agglutinations	-	0,00%
Summary Outputs	106,00	100,00%

5.8 TRACEABILITY

Audit Findings:

During the on-site audit representative samples of the products were verified. The traceability of Recycled Plastics throughout the process was fully documented and possible to verify. The records are kept and allow to ensure traceability throughout the entire process.

The digital system collects all information related to the production batch.

Each production batch contains the following information:

- "recycled input load report",

- "order from the customer" for a product - described basic parameters of the order, including the quantity to be produced,

- "index" - informs about the production technology - information from the production department,

- "Production order" - defines the recipe to be used, contains an "index" that describes the content of PC regranulate and the planned quantity of the product to be produced. The document contains a QR code that directs you to any information in the system.

"Production report" - filled in by the machine operator. The document contains a QR code that directs you to any information in the system. The QR code also allows you to link the order number with the number of the final product.

After production, the product is weighed - data to the system.

A "shipping specification" is created - which describes the product ready for sale.

SECTION 6: OUTPUT COMPOSITION

6.1 OUTPUT SPECIFICATIONS

Audit Findings:

The product specification was presented during the on-site audit. The specification contains extensive information about the product, including polymer, composition (including recycled input) and additives. The specification presents the indexes of individual products and their physical and chemical properties

Description of the Family of Products certified:

Product name:	PCR 20% PF – Post-Consumer Regranulate Packaging Foil
	Twwww*tttt RC20
	Twwww*ttttJ RC20
	Twwww [*] ttttA RC20
	Rwwww*tttt RC20
	Rwwww*ttttJ RC20
	Rwwww*ttttA RC20
Droduct codo:	Rwwww*ttttZ RC20
Product code:	Pwwww*tttt RC20
	Pwwww*ttttJ RC20
	Pwwww*ttttA RC20
	Pwwww*ttttZ RC20
	Zwwww*tttt*xxx*llll RC20
	Kwwww*tttt*xxx*llll RC20
	Wwwww*tttt*xxx*IIII RC20
Droduct	Product code legend:
description	T – film foil
description:	R – sleeve film

	P - half-sleeve film
	W – bag film
	Z – overlap film
	K – hood film
	J - ionization film
	A - printed film
	Z – overlap film
	RC – RecyClass film
	wwww – width film
	tttt -thickness film
	xxx – width overlap film
	IIII - length
Polymer	LDPE
Application:	Packaging foil
Width:	from 130 mm to 6000 mm
Thickness:	from 0,015 mm to 0,3 mm
Shape:	Flat foil on rolls without printings
Colour:	Colour and Transparent

Product name:	PCR 30% PF – Post-Consumer Regranulate Packaging Foil	
	Twwww*tttt RC30	
	Twwww*ttttJ RC30	
	Twwww*ttttA RC30	
	Rwwww*tttt RC30	
	Rwwww*ttttJ RC30	
	Rwwww*ttttA RC30	
Product codo:	Rwwww*ttttZ RC30	
Floudel code.	Pwwww*tttt RC30	
	Pwwww*ttttJ RC30	
	Pwwww*ttttA RC30	
	Pwwww*ttttZ RC30	
	Zwwww*tttt*xxx*llll RC30	
	Kwwww*tttt*xxx*llll RC30	
	Wwwww*tttt*xxx*llll RC30	
	Product code legend:	
	T – film foil	
	R – sleeve film	
	P - half-sleeve film	
Product description:	W – bag film	
	Z – overlap film	
	K – hood film	
	J - ionization film	
	A - printed film	
	Z – overlap film	

	RC – RecyClass film
	wwww – width film
	tttt –thickness film
	xxx – width overlap film
	IIII - length
Polymer	LDPE
Application:	Packaging foil
Width:	from 130 mm to 6000 mm
Thickness:	from 0,015 mm to 0,3 mm
Shape:	Flat foil on rolls without printings
Colour:	Colour and Transparent

Product name:	PCR 50% PF – Post-Consumer Regranulate Packaging Foil
	Twwww*tttt RC50
	Twwww*ttttJ RC50
	Twwww*ttttA RC50
	Rwwww*tttt RC50
	Rwwww*ttttJ RC50
	Rwwww*ttttA RC50
Droduct codo	Rwwww*ttttZ RC50
Product code:	Pwwww*tttt RC50
	Pwwww [*] ttttJ RC50
	Pwwww*ttttA RC50
	Pwwww [*] ttttZ RC50
	Zwwww*tttt*xxx*llll RC50
	Kwwww*tttt*xxx*llll RC50
	Wwwww*tttt*xxx*llll RC50
	Product code legend:
	T – film foil
	R – sleeve film
	P - half-sleeve film
	W – bag film
	Z – overlap film
Droduct	K – hood film
description	J - ionization film
description.	A - printed film
	Z – overlap film
	RC – RecyClass film
	wwww – width film
	tttt –thickness film
	xxx – width overlap film
	IIII - length
Polymer	LDPE
Application:	Packaging foil

Width:	from 130 mm to 6000 mm
Thickness:	from 0,015 mm to 0,3 mm
Shape:	Flat foil on rolls without printings
Colour:	Colour and Transparent

Twwww*tttt BA80 Twwww*ttttJ BA80 Twwww*ttttA BA80 Rwwww*tttt BA80 Rwwww*ttttJ BA80	
Twwww*ttttJ BA80 Twwww*ttttA BA80 Rwwww*tttt BA80 Rwwww*ttttJ BA80	
Twwww*ttttA BA80 Rwwww*tttt BA80 Rwwww*ttttJ BA80	
Rwwww*tttt BA80 Rwwww*ttttJ BA80	
Rwww*ttttJ BA80	
Rwwww^ttttA BA80	
Rwwww*ttttZ BA80	
Pwwww*tttt BA80	
Pwwww*ttttJ BA80	
Pwwww*ttttA BA80	
Pwwww*ttttZ BA80	
Zwwww*tttt*xxx*IIII BA80	
Kwwww*tttt*xxx*llll BA80	
Wwwww*tttt*xxx*llll BA80	
Product code legend:	
T – film foil	
R – sleeve film	
P - half-sleeve film	
W – bag film	
Z – overlap film	
K – hood film	
J - ionization film	
A - printed film	
Z – overlap film	
RC – RecyClass film	
wwww – width film	
tttt –thickness film	
xxx – width overlap film	
IIII - length	
Polymer LDPE	
Application: Packaging foil	
Width: from 130 mm to 6000 mm	
Thickness: from 0,015 mm to 0,3 mm	
Shape: Flat foil on rolls without printings	
Colour: Colour and Transparent	

6.2 CALCULATION OF RECYCLED CONTENT

Audit Findings:

The calculation of the recycled content was verified based on the production records presented during the audit. The percentage of recycled content presented reflect the reality of the recycled content present in products aiming for Certification for the period of evaluation.

Due to the very wide range of products included in one family, every effort should be made to properly qualify the products.

a) Product name: PCR 20% PF – Post-Consumer Regranulate Packaging Foil

Total Plastic Product – 100% =

Recycled Content Pre-C – 0,00% +

Recycled Content P-C - 23,81% +

Other: virgin, masterbatches, colorants - 76,19%

b) Product name: PCR 30% PF – Post-Consumer Regranulate Packaging Foil

Total Plastic Product – 100% =

Recycled Content Pre-C – 0,00% +

Recycled Content P-C – 30,30% +

Other: virgin, masterbatches, colorants – 69,70%

c) Product name: PCR 50% PF – Post-Consumer Regranulate Packaging Foil
 Total Plastic Product – 100% =
 Recycled Content Pre-C – 0,00% +
 Recycled Content P-C – 52,68% +
 Other: virgin, masterbatches, colorants – 47,32%

d) Product name: PCR 80% PF – Post-Consumer Regranulate Packaging Foil
Total Plastic Product – 100% =
Recycled Content Pre-C – 0,00% +
Recycled Content P-C – 82,08% +
Other: virgin, masterbatches, colorants – 17,92%

6.3 PLAUSIBILITY CHECK

Audit Findings:

During the on-site audit it was possible to check and document if the consumption data specified in the production records is in line with the proportion of Recycled Content. The quantity of Recycled Input used and Output produced considering the purchases and consumption figures. Stock, purchases and consumption were documented.

Purchases (t) – Stock (t) > Consumption (t)

230,839 (t) +142,513 (t) - 48,536 (t) = 324,816 (t) > 9,031 (t)

SECTION 7: OUTPUT REQUIREMENTS

7.1 OUTPUT SPECIFICATIONS

Audit Findings:

Recycled output supplied against a product specification – TDS - that refers to polymer, product index, recycled content and PC share recycled content, basic product physical/chemical properties.

7.2 RECORD OF SALES

Audit Findings:

The evidence and sales reports possible to verify. Evidence in the system generate the information about the all customers at random period of time. Information to generate:

- Who buys, how much, when the shipment was managed
- Weigh of the shipment, number of rolls

During on-site audit all sales documents from the period of evaluation were checked. All data registered in the digital system, easy to verify, completed automatically, according to the production and sales.

SECTION 8: SUBCONTRACTING

8.1 CONTROL OF SUBCONTRACTED PROCESSING

Audit Findings:

No subcontracting in production process.

8.2 SUBCONTRACTOR'S CERTIFICATE

Audit Findings:

No subcontracting in production process.

8.3 RECORD OF VOLUMES

Audit Findings:

No subcontracting in production process.

6. NON-CONFORMITIES IDENTIFIED

No non-conformities identified.

7. AUDITOR'S COMMENTS

The general approach to H&S at the site;

Staff is prepared to operate the processes. Production is save, all environmental aspects are respected.

An overall impression of site organization and management;

Company is well organized, prepared to LDPE foil production. Management is high motivated, to achieve targets. The processes are combination of manual and automatic actions.

• Areas where the site is operating to a particularly high standard;

Company delivers to the market very high quality products, proven by various certificates.

Areas where there is potential for improvement;

Data verification in terms of CPA is impossible. Although registration with RecoTrace is voluntary and optional, the audited organization should consider registering with RecoTrace and entering data monthly.

• Areas where improvement must be made to gain Certification (where an application for Certification was unsuccessful);

8. ANNEX I: CIRCULAR PLASTICS ALLIANCE

The following Annex verifies the tonnages to be reported to a CPA compliant Data Collector to count towards the monitoring of recycling and uptake of recyclates in the EU.

This Annex applies only to converters following the CPA definition.

The following data points were evaluated and verified for the period XXX. The following data is compliant with Traceability Level X.

8.1 CONVERTER'S TOTAL INPUT

Assessed period	Polymer type	Country of origin (EU+UK (specify country) or non-EU)*	Type of material (Pre- consumer/ Post- consumer)**	Source of material (sector)**	Tonnage (t)
TOTAL					

Specify the Converter's Total Input value and the period assessed below to be declared.

*Reporting optional for Traceability 2

**Report only for Traceability Level 1

Detail how the calculation was done to obtain the value and verify it is plausible.

Check if any Converter's Input was supplied by a trader. If this is the case, keep in mind that traders and compounders are subject to the same information obligation as recyclers (according to either Traceability level 1 or 2).

If the plant has received any material which has been refused that is recorded. That material cannot be included in the reported tonnages.

8.2 CONVERTER'S OUTPUT

Specify the Converter's Total Output value and the period assessed below to be declared.

Assessed period	Polymer type	Sold in the EU or exported	Type of material (Pre- consumer/ Post- consumer)*	Tonnage
TOTAL				

*Report only for Traceability Level 1

Detail how the calculation was done to obtain the value and verify it is plausible. If sales data is extrapolated from production records, please provide evidence that extrapolation is plausible.

If any deliveries have been returned by the customer, do not include those in the reported tonnages.

9. ANNEX II: AUDIT CHECKLIST

10. ANNEX III: FULL LIST OF CONFORMING PRODUCTS

Product code	Product name	Pre- consumer share (%)	Post- consumer share (%)	Other information
Twwww*tttt BA80	PCR 80%PF (Post-Consumer Regranulate 80% Packaging Foil) T – film foil, tttt –thickness film, wwww – width film	0%	80%	Different size and thickness
Twwww*ttttJ BA80	PCR 80%PF (Post-Consumer Regranulate 80% Packaging Foil) T – film foil, tttt –thickness film, wwww – width film, J - ionization film	0%	80%	Different size and thickness
Twwww*ttttA BA80	PCR 80%PF (Post-Consumer Regranulate 80% Packaging Foil) T – film foil, tttt –thickness film, wwww – width film, A - printed film	0%	80%	Different size, thickness and colour
Rwwww*tttt BA80	PCR 80%PF (Post-Consumer Regranulate 80% Packaging Foil) R – sleeve film, tttt –thickness film, wwww – width film	0%	80%	Different size, thickness and colour
Rwwww*ttttJ BA80	PCR 80%PF (Post-Consumer Regranulate 80% Packaging Foil) R – sleeve film, tttt –thickness film, wwww – width film, J - ionization film	0%	80%	Different size, thickness and colour
Rwwww*ttttA BA80	PCR 80%PF (Post-Consumer Regranulate 80% Packaging Foil) R – sleeve film, tttt –thickness film, wwww – width film, A - printed film	0%	80%	Different size, thickness and colour
Rwwww*ttttZ BA80	PCR 80%PF (Post-Consumer Regranulate 80% Packaging Foil) R – sleeve film, tttt –thickness film, wwww – width film, Z - overlap film	0%	80%	Different size, thickness and colour
Pwwww*tttt BA80	PCR 80%PF (Post-Consumer Regranulate 80% Packaging Foil) P - half-sleeve film, tttt –thickness film, wwww – width film	0%	80%	Different size, thickness and colour
Pwwww*ttttJ BA80	PCR 80%PF (Post-Consumer Regranulate 80% Packaging Foil) P - half-sleeve film, tttt –thickness film, wwww – width film, J - ionization film	0%	80%	Different size, thickness and colour
Pwwww [*] ttttA BA80	PCR 80%PF	0%	80%	Different size,

	(Post-Consumer Regranulate 80% Packaging Foil) P - half-sleeve film, tttt –thickness film, wwww – width film, A - printed film			thickness and colour
Pwwww*ttttZ BA80	PCR 80%PF (Post-Consumer Regranulate 80% Packaging Foil) P - half-sleeve film, tttt –thickness film, wwww – width film, Z - overlap film	0%	80%	Different size, thickness and colour
Zwwww*tttt*xxx*llll BA80	PCR 80%PF (Post-Consumer Regranulate 80% Packaging Foil) Z – overlap film, tttt –thickness film, wwww–width film, xxx–width overlap film, llll – length	0%	80%	Different size, thickness and colour
Kwwww*tttt*xxx*llll BA80	PCR 80%PF (Post-Consumer Regranulate 80% Packaging Foil) K – hood film, tttt –thickness film, wwww – width film, xxx – width overlap film, llll – length	0%	80%	Different size, thickness and colour
Wwwww*tttt*xxx*llll BA80	PCR 80%PF (Post-Consumer Regranulate 80% Packaging Foil) W – bag film, tttt –thickness film, wwww – width film, xxx – width overlap film, llll – length	0%	80%	Different size, thickness and colour
Twwww*tttt RC50	PCR 50%PF (Post-Consumer Regranulate 50% Packaging Foil) T – film foil, tttt –thickness film, wwww – width film	0%	50%	Different size and thickness
Twwww*ttttJ RC50	PCR 50%PF (Post-Consumer Regranulate 50% Packaging Foil) T – film foil, tttt –thickness film, wwww – width film, J - ionization film	0%	50%	Different size and thickness
Twwww*ttttA RC50	PCR 50%PF (Post-Consumer Regranulate 50% Packaging Foil) T – film foil, tttt –thickness film, wwww – width film, A - printed film	0%	50%	Different size, thickness and colour
Rwwww*tttt RC50	PCR 50%PF (Post-Consumer Regranulate 50% Packaging Foil) R – sleeve film, tttt –thickness film, wwww – width film	0%	50%	Different size, thickness and colour
Rwwww*ttttJ RC50	PCR 50%PF (Post-Consumer Regranulate 50% Packaging Foil) R – sleeve film, tttt –thickness film, wwww – width film, J - ionization film	0%	50%	Different size, thickness and colour
Rwwww*ttttA RC50	PCR 50%PF (Post-Consumer Regranulate 50% Packaging Foil) R – sleeve film, tttt –thickness film, wwww – width film, A - printed film	0%	50%	Different size, thickness and colour

	1	1	1	
Rwwww*ttttZ RC50	PCR 50%PF (Post-Consumer Regranulate 50% Packaging Foil) R – sleeve film, tttt –thickness film, wwww – width film, Z - overlap film	0%	50%	Different size, thickness and colour
Pwwww*tttt RC50	PCR 50%PF (Post-Consumer Regranulate 50% Packaging Foil) P - half-sleeve film, tttt –thickness film, wwww – width film	0%	50%	Different size, thickness and colour
Pwwww*ttttJ RC50	PCR 50%PF (Post-Consumer Regranulate 50% Packaging Foil) P - half-sleeve film, tttt –thickness film, wwww – width film, J - ionization film	0%	50%	Different size, thickness and colour
Pwwww*ttttA RC50	PCR 50%PF (Post-Consumer Regranulate 50% Packaging Foil) P - half-sleeve film, tttt –thickness film, wwww – width film, A - printed film	0%	50%	Different size, thickness and colour
Pwwww*ttttZ RC50	PCR 50%PF (Post-Consumer Regranulate 50% Packaging Foil) P - half-sleeve film, tttt –thickness film, wwww – width film, Z - overlap film	0%	50%	Different size, thickness and colour
Zwwww*tttt*xxx*llll RC50	PCR 50%PF (Post-Consumer Regranulate 50% Packaging Foil) Z – overlap film, tttt –thickness film, wwww–width film, xxx–width overlap film, IIII – length	0%	50%	Different size, thickness and colour
Kwwww*tttt*xxx*llll RC50	PCR 50%PF (Post-Consumer Regranulate 50% Packaging Foil) K – hood film, tttt –thickness film, wwww – width film, xxx – width overlap film, llll – length	0%	50%	Different size, thickness and colour
Wwwww*tttt*xxx*llll RC50	PCR 50%PF (Post-Consumer Regranulate 50% Packaging Foil) W – bag film, tttt –thickness film, wwww – width film, xxx – width overlap film, llll – length	0%	50%	Different size, thickness and colour
Twwww*tttt RC30	PCR 30%PF (Post-Consumer Regranulate 30% Packaging Foil) T – film foil, tttt –thickness film, wwww – width film	0%	30%	Different size and thickness
Twwww*ttttJ RC30	PCR 30%PF (Post-Consumer Regranulate 30% Packaging Foil) T – film foil, tttt –thickness film, wwww – width film, J - ionization film	0%	30%	Different size and thickness
Twwww*ttttA RC30	PCR 30%PF (Post-Consumer Regranulate 30% Packaging Foil) T – film foil, tttt –thickness film, wwww – width film, A - printed film	0%	30%	Different size, thickness and colour

Rwwww*tttt RC30	PCR 30%PF (Post-Consumer Regranulate 30% Packaging Foil) R – sleeve film, tttt –thickness film, wwww – width film	0%	30%	Different size, thickness and colour
Rwwww*ttttJ RC30	PCR 30%PF (Post-Consumer Regranulate 30% Packaging Foil) R – sleeve film, tttt –thickness film, wwww – width film, J - ionization film	0%	30%	Different size, thickness and colour
Rwwww*ttttA RC30	PCR 30%PF (Post-Consumer Regranulate 30% Packaging Foil) R – sleeve film, tttt –thickness film, wwww – width film, A - printed film	0%	30%	Different size, thickness and colour
Rwwww*ttttZ RC30	PCR 30%PF (Post-Consumer Regranulate 30% Packaging Foil) R – sleeve film, tttt –thickness film, wwww – width film, Z - overlap film	0%	30%	Different size, thickness and colour
Pwwww*tttt RC30	PCR 30%PF (Post-Consumer Regranulate 30% Packaging Foil) P - half-sleeve film, tttt –thickness film, wwww – width film	0%	30%	Different size, thickness and colour
Pwwww*ttttJ RC30	PCR 30%PF (Post-Consumer Regranulate 30% Packaging Foil) P - half-sleeve film, tttt –thickness film, wwww – width film, J - ionization film	0%	30%	Different size, thickness and colour
Pwwww*ttttA RC30	PCR 30%PF (Post-Consumer Regranulate 30% Packaging Foil) P - half-sleeve film, tttt –thickness film, wwww – width film, A - printed film	0%	30%	Different size, thickness and colour
Pwwww*ttttZ RC30	PCR 30%PF (Post-Consumer Regranulate 30% Packaging Foil) P - half-sleeve film, tttt –thickness film, wwww – width film, Z - overlap film	0%	30%	Different size, thickness and colour
Zwwww*tttt*xxx*llll RC30	PCR 30%PF (Post-Consumer Regranulate 30% Packaging Foil) Z – overlap film, tttt –thickness film, wwww–width film, xxx–width overlap film, IIII – length	0%	30%	Different size, thickness and colour
Kwwww*tttt*xxx*llll RC30	PCR 30%PF (Post-Consumer Regranulate 30% Packaging Foil) K – hood film, tttt –thickness film, wwww – width film, xxx – width overlap film, llll – length	0%	30%	Different size, thickness and colour
Wwwww*tttt*xxx*llll RC30	PCR 30%PF (Post-Consumer Regranulate 30% Packaging Foil) W – bag film, tttt –thickness film, wwww – width film, xxx – width overlap film, llll – length	0%	30%	Different size, thickness and colour

Twwww*tttt RC20	PCR 20%PF (Post-Consumer Regranulate 20% Packaging Foil) T – film foil, tttt –thickness film, wwww – width film	0%	20%	Different size and thickness
Twwww*ttttJ RC20	PCR 20%PF (Post-Consumer Regranulate 50% Packaging Foil) T – film foil, tttt –thickness film, wwww – width film, J - ionization film	0%	20%	Different size and thickness
Twwww*ttttA RC20	PCR 20%PF (Post-Consumer Regranulate 50% Packaging Foil) T – film foil, tttt –thickness film, wwww – width film, A - printed film	0%	20%	Different size, thickness and colour
Rwwww*tttt RC20	PCR 20%PF (Post-Consumer Regranulate 50% Packaging Foil) R – sleeve film, tttt –thickness film, wwww – width film	0%	20%	Different size, thickness and colour
Rwwww*ttttJ RC20	PCR 20%PF (Post-Consumer Regranulate 20% Packaging Foil) R – sleeve film, tttt –thickness film, wwww – width film, J - ionization film	0%	20%	Different size, thickness and colour
Rwwww*ttttA RC20	PCR 20%PF (Post-Consumer Regranulate 20% Packaging Foil) R – sleeve film, tttt –thickness film, wwww – width film, A - printed film	0%	20%	Different size, thickness and colour
Rwwww*ttttZ RC20	PCR 20%PF (Post-Consumer Regranulate 20% Packaging Foil) R – sleeve film, tttt –thickness film, wwww – width film, Z - overlap film	0%	20%	Different size, thickness and colour
Pwwww*tttt RC20	PCR 20%PF (Post-Consumer Regranulate 20% Packaging Foil) P - half-sleeve film, tttt –thickness film, wwww – width film	0%	20%	Different size, thickness and colour
Pwwww*ttttJ RC20	PCR 20%PF (Post-Consumer Regranulate 20% Packaging Foil) P - half-sleeve film, tttt –thickness film, wwww – width film, J - ionization film	0%	20%	Different size, thickness and colour
Pwwww*ttttA RC20	PCR 20%PF (Post-Consumer Regranulate 20% Packaging Foil) P - half-sleeve film, tttt –thickness film, wwww – width film, A - printed film	0%	20%	Different size, thickness and colour
Pwwww*ttttZ RC20	PCR 20%PF (Post-Consumer Regranulate 20% Packaging Foil) P - half-sleeve film, tttt –thickness film, wwww – width film, Z - overlap film	0%	20%	Different size, thickness and colour
Zwwww*tttt*xxx*llll RC20	PCR 20%PF	0%	20%	Different size,

	(Post-Consumer Regranulate 20% Packaging Foil) Z – overlap film, tttt –thickness film, wwww–width film, xxx–width overlap film, llll – length			thickness and colour
Kwwww*tttt*xxx*llll RC20	PCR 20%PF (Post-Consumer Regranulate 20% Packaging Foil) K – hood film, tttt –thickness film, wwww – width film, xxx – width overlap film, llll – length	0%	20%	Different size, thickness and colour
Wwwww*tttt*xxx*llll RC	PCR 20%PF (Post-Consumer Regranulate 20% Packaging Foil) W – bag film, tttt –thickness film, wwww – width film, xxx – width overlap film, llll – length	0%	20%	Different size, thickness and colour

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