Auditor Requirements & Application
APR PCR Certification Program

As of April 1, Reclaimers who seek new/initial certification will be required to certify to the new standard.

NOTE: A new APR PCR Certification Standard was launched in November 2024. This below document applies to a grandfathered APR PCR Certification Program, and should only be used in accordance with the following transition timeline:

- *Reclaimers who are newly certified or those who have recertified after July 1st, 2024 will NOT be required to immediately recertify to the new APR standard. They will be expected to certify to the new standard by their expiry date in 2025.*
- *Reclaimers who are currently certified and whose certificate expiry date falls on or before July 1st, 2025, will have the option to recertify to the old standard (below) if they do not believe they are ready to certify to the new standard.*
- *Reclaimers who are currently certified and whose certificate expiry date falls after July 1st, 2025, will be expected to recertify to the new standard.*

I. Introduction

Who is APR?

The Association of Plastic Recyclers (APR) is an international trade association which focuses exclusively on plastics recycling, with membership spanning the entire industry. APR works to enhance quality and increase supply through technical resources, testing programs, design solutions, corporate training, regulatory leadership, and education programs. APR promotes development of the plastics recycling industry by providing leadership for long-term industry growth and vitality that contributes to a circular economy. Simply put, APR is The Voice of Plastics Recycling®.

Why is certification important?

Recycling is an essential step to enable the circular economy and reduce plastic waste, and the production and consumption of recycled content in the form of Postconsumer Recycled Content (PCR) is key. To support and grow the use of postconsumer recycled plastics, it is essential that certification of PCR be 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 fulfillment of specified requirements by the third party.

What is the APR PCR Certification Program?

APR endorses third-party certification companies that meet its guidelines, and then these APR-endorsed companies conduct audits of reclaimers.

Through this process APR seeks to:

- Provide the industry with confidence that APR-endorsed certifying bodies adhere to a clear, consistent definition of PCR.
- Help level the playing field by endorsing multiple, credible third-party certifying bodies that APR members and others can voluntarily utilize.
- Increase accessibility to and confidence in certification that meets the needs of members across diverse PCR applications.

The only grade that qualifies for APR PCR Certification is postconsumer resin (PCR). APR members that receive certification are recognized on the APR website in a directory of certified PCR.

A Special Note on California Senate Bill 270
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.

II. Conditions for Endorsement

If your company seeks endorsement by APR to conduct certification audits on behalf of the APR PCR Certification Program, you must meet the following criteria:

- Have and maintain ISO 17065 Accreditation
- Adhere to and understand ISO definitions ISO 14021:2016 (E)
    - **Postconsumer Recycled Content** (PCR) means material generated by households or by commercial, industrial and institutional facilities in their role as end-users of the product which can no longer be used for its intended purpose. This includes return of material from the distribution chain.
    - **Post-Industrial Recycled** (PIR) Content means material diverted from the waste stream during a manufacturing process. Excluded 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.
- Maintain reasonable expectations of customer service, including having appropriate staffing to reply to customer inquiries within two business days.
- Use the below Program Guidelines in certifying PCR
- Be willing to include APR co-branding on digital PCR certification document, and alert APR when certification is issued.

- Accurately represent your involvement with APR PCR Certification Program, which may include signing an agreement with APR, e.g. Terms of Use or similar.

If you meet the above criteria, your next step is to apply for endorsement from APR.

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.

III. Program Guidelines

1. Overview

a. A chain of custody audit will be used to trace the path of all material flow within the recycling facility to ensure enough post-consumer raw material was purchased and used in production to consistently meet the recycled content claims within the certification period.
b. There will be an evaluation of the source of the recycled raw materials to ultimately determine the total percent (by weight) of the post-consumer material being used to manufacture the PCR.
c. Conducts a virtual or in-person site visit for initial audit.

2. Required Documentation

a. 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 post-consumer materials detailing the amount and type of raw materials used to manufacture the PCR (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 post-consumer material.
    iv. An address, name of responsible person and contact information for each of the raw 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 raw material recycled content materials which contain data clearly describing existing plant inventory, production, and shipping information along with invoices to match.
    vii. Information demonstrating that the post-consumer material is cleaned using appropriate washing equipment (for all mechanical recyclers.)

3. Mass Balance

a. 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.

4. Recycled Content Calculations

a. 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 post-consumer material (on a percent by weight basis) within the final PCR grade certified.
b. The only grade that qualifies for APR PCR Certification is Postconsumer Recycled Content (PCR). If the certificate you issue to the reclaimer at the conclusion of the audit lists any percentage of PIR, this does not meet APR PCR Certification Program Guidelines.
    i. Acknowledgment: The APR PCR Certification Program is subject to standard variance consistent with post-consumer recycled material. This means no more than 10% at any given time, due to inadvertent means. See Appendix B for more information on this.

5. Annual Recertification Process

a. 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.

6. Site Audit

a. The certifying company agrees to do a virtual or in-person site visit to audit the manufacturer's/recycler's facility, which can include
    i. Audit and verify the material utilization and material flows within the manufacturing/recycling process (MANDATORY),
    ii. Conduct a detailed review of documentation and chain of custody records of material flows during the site visit (MANDATORY),
    iii. Assess inventory control and segregation for inventory of finished product which contains certified recycled content material (MANDATORY),
    iv. Validate existence of equipment suitable for washing post-consumer material (MANDATORY),
    v. 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,
    vi. Walk through the facility to confirm quality control procedures and/or SOPs that define good manufacturing practices when handling recycled content production, and

vii. Conduct a visual inspection and collect photo documentation to verify the recycled content materials being used within the process to manufacture the PCR.

IV. Application Form

Basic Contact Information

Company Name:

Company Address:

Company Website:

Contact Name:

Contact Job Title:

Contact Email:

Contact Phone Number:

Quality Management System Information

ISO17065 Accreditation Body:

Certificate Number:

Valid Until:

About Your Company

Describe your company.

Geographic markets covered:

How many auditors do you have on staff?

In which languages does your company offer services?

List any other accreditations, endorsements, and/or participation in other certification programs:

What is your company's experience with and technical expertise in plastics recycling? If your company has conducted recycled content audits before, please include details about this.

Process Flow

Describe your steps, including timeline, associated with an audit that is in accordance with the above Program Guidelines. You may describe this below in either bulleted or narrative format, or you may attach a process flow chart diagram to your application.

V. Declaration

I have authority to submit this application to APR on behalf of my company and I accept the following conditions.

My company will certify PCR in accordance with the APR PCR Certification Program Guidelines listed above.
My company understands and will adhere to ISO definitions (ISO 14021:2016 (E)) for PCR and PIR.
My company will maintain ISO17065 accreditation.
My company is adequately staffed to maintain reasonable expectations of customer service, including replying to customer inquiries within two business days.
My company agrees to include APR co-branding on digital PCR certification document, and alert APR when certification is issued.

Representative Name: Representative Title:

Signature of Authorized Representative:

Date:

Final Application Checklist
Submit the following documents to info@plasticsrecycling.org We aim to respond to applications within two weeks of submission.

Completed Application Form
Copy of ISO17065 Accreditation
Any additional and relevant supporting documentation (optional)

Appendix A:

APR PCR Certification Program: Differentiating PCR and PIR

The following are non-binding examples of what should and should not be considered Postconsumer Recycled Content (PCR). These examples have not been formally adopted or endorsed by ISO; APR offers them as expert guidance to help clarify the nuanced differences between PCR and PIR. APR considers the key differentiator to be whether or not a product has left the manufacturing facility, i.e. in order to be considered PCR the product must have left the manufacturing facility and entered the distribution chain.

Examples considered to be acceptable as Postconsumer Recycled Content (PCR):

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. 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
x. Plastic food containers used in bakeries to hold bulk foodstuffs used to produce baked goods
xi. Plastic foam, film and/or wrap used to protect goods during shipping
xii. Material returned from the distribution chain, including containers of product filled, shipped, and subsequently scrapped in or returned from the distribution chain for being out of date or damaged
xiii. Scrap from the production of 100% PCR packaging that is collected and re-used in new production

Examples *NOT* considered to be acceptable as Postconsumer Recycled Content (PCR):

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 elsewise 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
vi. Product that doesn't leave the manufacturers site, even if it is fully produced, filled, labeled and ready to ship

Appendix B:

APR PCR Certification Program: Examples of Variation in Inbound Material

For pellet or flake certification, the only grade that qualifies for APR PCR Certification is postconsumer resin (PCR). If the certificate you issue to the reclaimer at the conclusion of the audit lists any percentage of PIR, this does not meet APR PCR Certification Program Guidelines. Another way to look at this is to consider the APR PCR Certification Program as a pass/fail system where the reclaimer is providing proof that all their postconsumer source material is PCR.

However, due to the nature of variation in plastic reclamation/recycling, the APR PCR Certification Program will recognize material sourced that contains a minimum 90% postconsumer plastic material. In other words, APR understands that some contamination may happen at the MRF. APR offers the following examples to clarify what this might look in practice.

Example: A Material Recovery Facility (MRF) services local generators (note that MRFs usually service households but not always). At one time, the MRF receives production scrap from a dairy (milk bottles) and bales that material along with curbside-generated material. The dairy material is a very small percentage of the volume, but the bale is sent to the reclaimer labeled as postconsumer.

Example: A bottle customer makes a bad lot, e.g. misprinted labels, off color, etc. That small amount of material is shipped back to the reclaimer. The reclaimer only has one wash line for mixed color bottles so that bottle material from the bad lot is mixed in with the curbside, but the bad lot material represents only a small percentage, e.g. 1-2% of volume.

Example: A recycled resin producer is called upon to assist with silo clean out due to cross-contamination and that material represents a small percentage of the volume, e.g. .5-1%.

Example: Any additives, color concentrates, antioxidants, modifiers, etc. can add 1-5% by weight to the resin.