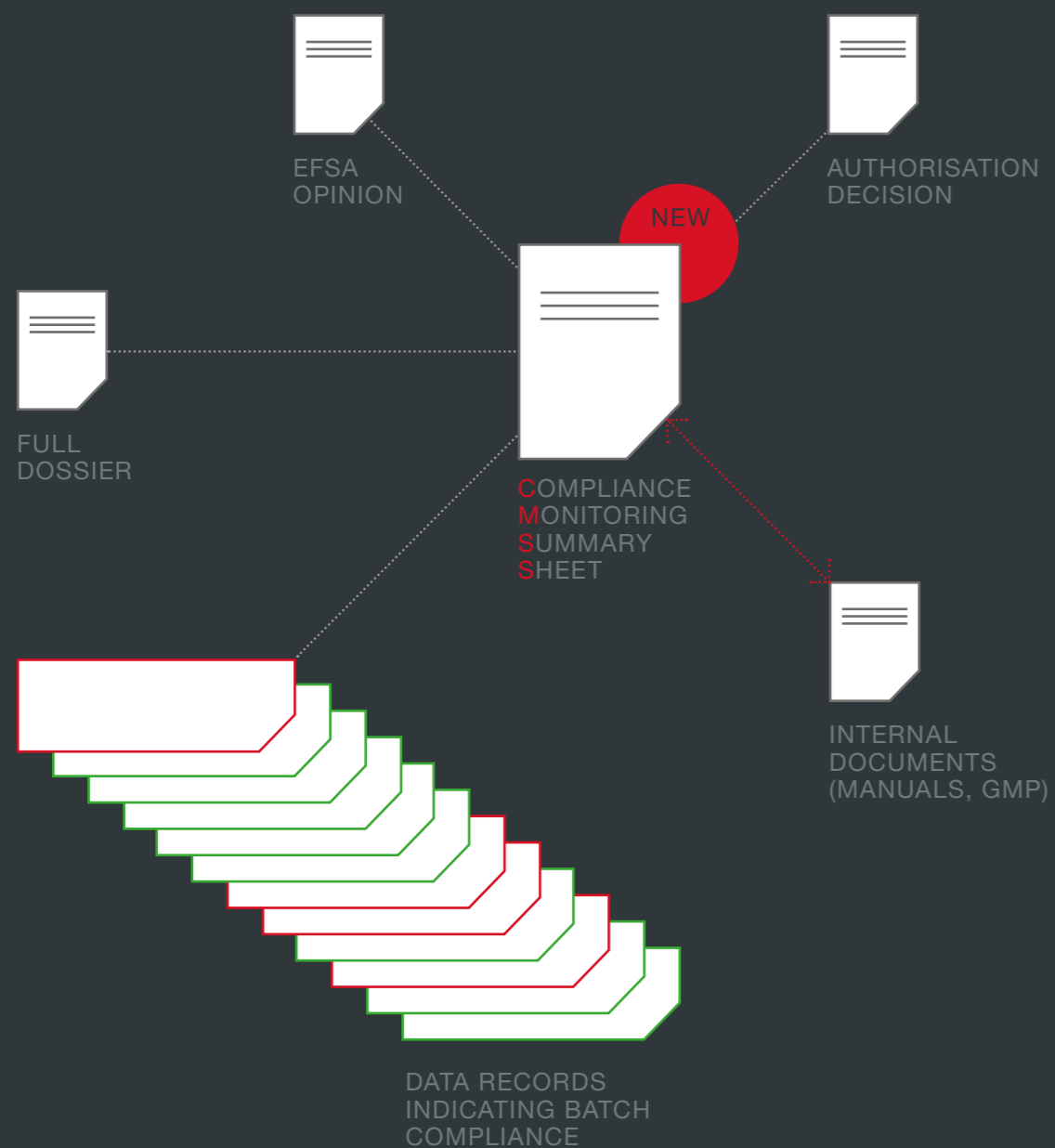


OFFICIAL CONTROLS OF RECYCLING PLANTS:

The next milestone for authorized recycling processes



“Basis for future audits will be the so-called CMSS.”

LISA STRAUB
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The official control shall verify that the recycling process corresponds to the authorised process and that an effective quality assurance system in accordance with Regulation (EC) No 2023/2006 is in place. This is what Article 10 of Regulation 282/2008 says. In other words, recycling companies that produce rPET for direct food contact will be audited. What will be audited, by whom, and when are probably the most interesting questions now. I'll try to give some answers.

What will be audited?

Basis for future audits will be the so-called CMSS – the compliance monitoring summary sheet. Although the exact content has not been disclosed yet critical and essential process steps will be part of this CMSS. Recyclers may reckon that auditors control their material input stream, specifications, process layout and configuration, operation of critical steps (pressure, temperature, time), composition of the recycled plastic (how much virgin has to be added), monitoring and so on.

Who will be auditing? What about the BTSF training sessions?

Euro Consultants was appointed to manage this new BTSF project (Better Training for Safer Food) in partnership with Polymer Comply Europe (PCE). As outlined on the homepage of

Euro Consultants, the purpose of the training is to provide an understanding of various aspects of plastic recycling process auditing and the various authorizations required, to share the best possible audit practices and ensure that implementation standards are con-

Most interesting questions regarding the audit:

- #1 What will be audited?
- #2 Who will be auditing?
- #3 When will the audit start?

sistent within the Union. The training is primarily intended for the competent authority responsible for auditing recyclers and food inspectors. It is also intended for certain users further down the chain. Six training sessions are planned, first one takes place in April 2016 in Leipzig. Treviso and Vienna are following. During four days several experts impart knowledge in the fields of

recycled plastic food contact materials, quality assurance documentation, process technology and risk management. Each training session contains a field visit to a plastics recycling plant, where attendees get an idea of the recycling business and processes in reality.

When will the audits start?

Before audits can start, European Commission has to submit decisions granting or refusing authorisation of the recycling process for which an EFSA petition has been submitted. As there are still some unclear points (how to treat material from non-EU sources, how to harmonise process descriptions etc.), the publication of the decisions is delayed. Next discussion about this topic takes place in **June 2016**. Supposedly, the Official Journal with the final decisions is published in **third quarter of 2016**. Soon after the decisions enter into force, Member States will be auditing the CMSS.

As we have all seen the last years, the mills of EC grind slowly. Even if I'm having the impression that finally things are moving, there are still many crucial points to clarify and/or communicate. The interval of audits, sanctions for non-compliance, appointment of auditors and handling of recyclers in third countries are just four examples.