

ANNEX

Clarifications regarding the documentary evidence required by the Regulation certification and maintenance of the PSV and PSV-By- product certification Iss. 2 Rev.1 of 10/2022.

With reference to § 2.3 point 4) “Traceability and product identification” it is specified that:

- The records required under point 4) include the information listed in Table 1 of EN 15347:2007 (*) in the case of waste as input material and in Table 1 of EN 15343:2007 (**) in the case of SRM (secondary raw material). The above information must be reported by companies in the “technical report” document and is verified during the audit (as required by paragraph 2.7.1 of the Regulation) and reported in the verification checklist (paragraphs “input material control” and “assessment of the degree of traceability”). In particular, in the case of SRM certification, the waste disposal form and the EWC, from which the description of the waste is obtained, including the origin, and the other relevant information required by Table 1 of the EN 15343:2007 standard, are also mandatorily checked.

With reference to § 2.3 point 3) “Description of the production process” it is specified that:

- The Process Control Requirements reported in §2.3 point 3) of the PSV Regulation include the performance of challenge tests if legislation or relevant technical standards provide for it in the case of specific applications.
It is specified that, in the case of PSV-Food certification, paragraph 2.6 of the PSV Regulation provides for the integration of the technical report with:
“The results of the tests required for compliance with Italian Ministerial Decree 21/3/73 and subsequent updates and Regulation (EU) No. 10/2011 or the results of the tests required by the declaration of conformity of Regulation (EU) No. 2022/1616.”
Challenge tests are explicitly referred to in Regulation (EU) No. 2022/1616 (art. 32) and are mandatory, in the case of products where the functional barrier is present, to demonstrate the absence of migration of contaminants from the internal layer containing recycled plastic through the external layer made of virgin material that comes into contact with food.
In the case of products containing recycled plastic that comes into direct contact with food (without a functional barrier) for the purposes of the declaration of conformity required by EU Regulation No. 2022/1616, specific migration and global migration tests are carried out as required by Regulation (EU) No. 10/2011 and subsequent updates and, for substances subject to Italian national regulation, by Ministerial Decree 21 March 1973 and subsequent updates.

(*)EN 15347:2007 “Plastics – Recycled Plastics – Characterisation of plastics wastes”

(**)EN 15343:2007 “Plastics – Recycled Plastics – Plastics recycling traceability and assessment of conformity and recycled content”