

CIRCULAR PLASTICS ALLIANCE

MONITORING SYSTEM

Methodology

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Chapter 0 - Introduction

A. Context

The Circular Plastics Alliance (CPA) was launched in 2018 by the European Commission as a voluntary platform for industry to deliver on the circular economy for plastics and substantially increase the use of recycled plastics in new products. The specific aim of the CPA is to work together to collectively achieve at least 10 million tonnes of recycled plastics materials in products and packaging placed on the European market each year by 2025. More than 240 organisations and companies covering the full plastics value chain, including research organisations, producers, raw material suppliers, Recyclers, standardisation bodies and public authorities have signed up to the CPA and are committed to working together to achieve this goal.

The CPA is arranged into 6 working groups: 5 sectorial working groups (Agriculture, Automotive, Building and Construction, Electronic and Electrical Equipment, and Packaging), as well as a crosscutting working group devoted to the set-up of a monitoring system to track the plastics recycling flows in Europe.

In its declaration of September 2019, the CPA committed to the following:

We commit to set up by 1/1/2021 a harmonised EU value chain voluntary system to monitor volumes[1] of Recycled Plastics used in European products[2]. The system will be transparent, trusted and ensure traceability of the data.

The objective is to aggregate and/or generate data from these three stages:

- collected & sorted plastics waste
- the Recyclers' inputs, the inputs to the recycling operations and the Recyclers' outputs (including imports and exports); and
- the Converters' inputs and outputs of the use in market segments of recycled plastics (including imports and exports).

We commit to have the system and data audited.

We call on all stakeholders to actively support the set-up and use of the system. We call on all public authorities across the EU, as well as Producer Responsibility Organisations, to collect and share the necessary data.

[1] Preferably by mass balance, by polymer/country/market segment /legal compliances[2] On an aggregate tonnage basis in order to track the 10 million tonnes target

This document describes the monitoring system and its supporting rules, as designed by the CPA's Monitoring Working Group, with input from all 5 sectoral Working Groups, in order to fulfil this commitment.

B. Structure of the monitoring system

As a first step in designing this monitoring system, an analysis of the existing tools in Europe aimed at monitoring data in relation with the treatment of plastics waste was undertaken. It showed that none of them fulfilled all CPA requirements at the same time. Systems existed with narrower scopes, such as one type of data, for instance the use of recycled plastics, or one type of polymer, for instance PVC. However, none met all the needs of the CPA's commitment and in addition the various existing tools did not follow the same methodology.

This has led the CPA Monitoring Working Group to create a first-of-its-kind new system to deliver the Recycled Plastics monitoring needs of the entire value chain. The system builds on existing tools and is also capable to integrate new ones, allowing a variety of actors to input the data for their polymer, sector or country. The CPA monitoring system is designed with a common set of requirements applicable to all contributors, such that the final information on Recycled Plastics flows will be, transparent, trusted and ensure traceability of data. These common requirements also ensure that data is comparable and double counting is avoided.

The structure of this new system is based on 3 types of contributors all acting in accordance with the rules and requirements set out in this document:

- 1. the Data Generators: economic actors who report audited data on their own recycling or converting activity to a single CPA approved Data Collector,
- 2. the Data Collectors: non-profit, EU based legal entities who collect and consolidate the data and audits from Data Generators, in a system that is itself audited,
- 3. the CPA Monitoring Secretariat: a group appointed by the Monitoring working group, from within its membership, to oversee the operation of the system, aggregate the audited information on recycling and conversion of Recycled Plastics along with the overview of collected and sorted waste information thereby generating the overarching CPA report on Recycled Plastics flows. The group will have the resources and skills required to undertake all the activities outlined within this document.

The State-of-play on collection and sorting of plastic waste published by the CPA in October 2020 highlighted the complexity of gathering data on collected and sorted post-consumer plastic waste. Furthermore, it set out the best available methodologies to estimate some of these quantities and available statistics and reporting to use, in particular from Producer Responsibility Organisations (PROs) for the sectors where these exist. At present there are almost no data sources for the collection and sorting of the pre-consumer plastic waste. Under these conditions, the CPA has decided in an initial phase to undertake a data gathering exercise from the best available sources for this value-chain stage. The monitoring of audited data on recycling and conversion will generate the first available credible data set on the volumes of pre-consumer plastic waste contributing to the Recycled Plastics flow in Europe.

The monitoring system can be illustrated as follows:



Image 1: Overview of the system actors and activities



Image 2: Schematic flow of information and responsibilities

This document and its annexes set out the common requirements of the system that ensures data is gathered at each step of the recycling value-chain, from collection of waste to the use of Recycled Plastic, by polymer, sector and country in a fully harmonized and competition compliant manner across Europe.

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As with all CPA activities the creation of and contribution to this monitoring system is a voluntary activity, demonstrating the commitment of the plastics industry to a circular economy. We welcome and encourage contribution of data also from non-CPA signatories to help establish the most robust overview possible of the Recycled Plastics market in Europe.

Chapter I – Definitions

This section provides an overview of the key terms that are essential for the monitoring system and will be used throughout the whole methodology document.

A. Characteristics of the system

This section defines the terms found in the monitoring commitment of the CPA declaration.

Audited Data

Verification by an external party that data has been generated with accordance to the defined methodology.

Audited System

Verification by an external party which collects and aggregates data following appropriate protocols.

Compliant with Legal Competition Rules

The data exchange and communication must comply with EU competition law requirements.

Europe

For the purposes of this methodology Europe refers to the 27 EU Member-States plus the UK.

Harmonised

Data to be collected at the different required levels (value-chain stages, countries, polymers, sectors), must have the same definitions, must be collected and audited following the same rules; CPA defines the methodology (inc. quality assurance) to ensure harmonisation.

Raw material

Material which has never been processed into any end-use product.

Traceability

CPA is able to obtain and provide information about the origin and method of data creation.

Transparency

The way data is collected, managed, processed and used must be openly communicated through publication of the methodology and results. Furthermore, information regarding a legal entity's assets, income and expenditure with regard to CPA related activities must be provided upon request.

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Value chain monitoring system

A monitoring system to which all actors in the value chain - waste operators, Recyclers, Converters, raw materials producers, retailers, brand-owners, as well as EPRs and public authorities -contribute.

Value chain stages

[As defined directly in the <u>Declaration of the CPA</u>]

Collected & sorted plastics waste; the Recyclers' inputs, the inputs to the recycling operations and the Recyclers' outputs, as well as, the Converters' inputs and outputs of the use in market segments of Recycled Plastics. This includes imports and exports for the outputs of Recyclers and Converters.

Voluntary

All signatories of the CPA need to show a willingness to contribute to the monitoring system. Nonsignatories are invited to collect and share data and other stakeholders to support its set up and use.

B. Actors of the Monitoring system

Additional Compounding

The addition of new additives or virgin plastic to recycled plastics.

Converter

Specialized operator capable of shaping plastics raw material to make a usable semi-finished or finished product. *[ISO 472: 2.1685]*

Data Collector

European non-profit legal entity collecting and consolidating a defined set of the CPA required data from Data Generators.

Data Generator

Legal entity providing a Data Collector with required data about its own economic activities

CPA Note: economic activities must be carried out in compliance with all applicable laws

Monitoring Secretariat

Administrative body as outlined in Chapter IV.

Producer Responsibility Organisation (PRO)

A legal entity, authorised by government that fulfils the legal obligations of companies under extended producer responsibility legislation. Typically, this is through organising separate collection, sorting and recycling of waste packaging or end-of-life products.

Recycler

Entity that processes the plastics waste materials to be used again for the original purpose or for other purposes excluding energy recovery and fuel production.

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C. System data

Collected Waste

Any plastic waste that is collected for any recovery or disposal operation.

Converter's Input

The total weight of Recycled Plastic received / bought by a Converter in Europe, and imported /delivered to the Converter from outside Europe, during the previous calendar year.

Converter's Output

The total weight of recycled plastic included in products sold during the previous calendar year.

Input to Recycling Operation

Plastic separated by polymers that does not undergo further processing before entering pelletisation extrusion, or moulding operations. Or, plastic flakes, regrind, micronized powder that do not undergo further processing before their use in a final product.

CPA Note 1: This definition is fully set out for municipal waste in Commission Implementing Decision (EU) 2019/2004 and for packaging waste in Commission Implementing Decision (EU) 2019/665.

CPA Note 2: this definition does not currently cover all recycling technologies and will be updated

Recycler's Total Input

The total weight of sorted waste received by Recyclers in Europe during the previous calendar year.

Recycler's Total Output

The total weight of Recycled Plastic as output from the recycling process, either sold or used within the same legal entity, during the previous calendar year.

CPA Note: some recycling processes may involve more than one actor.

Sorted Waste

Plastic waste delivered to Recyclers in Europe and outside.

D. Others

Chemical Recycling

[European Coalition for Chemical Recycling]

Chemical Recycling converts polymeric waste by changing its chemical structure to produce substances that are used as products or as raw materials for the manufacturing of products. Products exclude those used as fuels or means to generate energy.

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Pre-consumer

Material diverted during a manufacturing process, excluding re-utilized material, such as rework, regrind or scrap that has been generated in a given process and is capable of being reclaimed within that same process.

CPA Note: For further clarification on the scope of pre-consumer material, please refer to the Guidance on Waste definitions.

Post-consumer

Descriptive term covering material, generated by the end users of products, that has fulfilled its intended purpose or can no longer be used (including material returned from within the distribution chain).

Recycled Plastic

Plastic prepared by processing plastics waste for the original purpose or other purposes, but excluding energy recovery and fuel production.

CPA Note: Recycled plastics excludes new additives (inc. fillers) added before using the material in new products

E. Sectors and related applications

Agriculture Sector

For the purpose of monitoring the use of Recycled Plastic, agriculture sector is meant to cover non-packaging items (film, twine, netting and pipe).

Automotive Sector

For the purpose of monitoring the use of Recycled Plastic, automotive sector is meant to cover 4wheels vehicles from the categories M1 and N1. All applications of the vehicle should be considered, including interiors, exteriors and under-the-hood.

Building & Construction (B&C) Sector

For the purpose of monitoring the use of Recycled Plastic, B&C sector is meant to cover:

Resilient Flooring Carpet Roofing, building membranes and sheets Windows, doors and related building products Pipes and fittings Building profiles cladding Insulation materials Cables

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Electrical and Electronic Equipment (EEE) sector

The definition of the electrical and electronic equipment is defined for the CPA methodology as per the definition in Directive 2012/19/EU on waste electrical and electronic equipment. 'EEE' means equipment which is dependent on electric currents or electromagnetic fields in order to work properly and equipment for the generation, transfer and measurement of such currents and fields and designed for use with a voltage rating not exceeding 1 000 volts for alternating current and 1 500 volts for direct current;

Packaging Sector

For the purpose of monitoring the use of Recycled Plastic, 'packaging' shall mean all products made of any materials of any nature to be used for the containment, protection, handling, delivery and presentation of goods, from raw materials to processed goods, from the producer to the user or the consumer. 'Non-returnable' items used for the same purposes shall also be considered to constitute packaging. This shall include all sales (primary) packaging, grouped (secondary) packaging or transport (tertiary) packaging.

Automotive	PP, PA, PPA, ABS, ABS-PC, PC, PMMA, PVC, TPU,
	PET, ASA, PUR, PS, PE, POM, LL/LDPE, HDPE,
	EPS, SAN.
Agriculture	LL/LDPE, HDPE, PP.
Packaging	PET, HDPE, LLDPE/LDPE, PP, PO (mixed), PS,
	EPS, PVC.
B&C	PVC, PP, EPDM, HDPE, LL/LDPE, PC, PMMA,
	PES, PEX, ABS, PB, PA, PVDF, PPS, PPSU, XPS,
	EPS, PUR, PIR, PA, EVA.
EEE	PS, ABS, EPS, XPS, PP, PC/ABS, HDPE, LL/LDPE.

Resin types per sector

Chapter II – Data generation rules

A. Data generation rules for Recyclers and Converters: general principles

Data Generators are legal entities providing the required data about own economic activities (e.g., recycling, conversion) to a single Data Collector.

Each Data Generator may choose a single approved Data Collector they provide their data to. This rule is established to minimise chances of double counting.

A Data Generator reports the tonnages of each required data point per site, and provides the company VAT number and town/city for that site. This information will be used by the Data Collector as a unique identifier for tonnages from this site. This information makes it possible to trace data back through the Data Collector to the original source information should any questions, or potential double counting, arise during the aggregation by the Monitoring Secretariat.

Data Generators report tonnages for each data point required by the CPA as applicable to their own economic activity at the site in question. See below the full list of required data points and Annexes Z the template of these. Data Collectors will develop the infrastructure to enable Data Generators to provide all the data points contained in this template.

Converters who also recycle waste internally must report in line with the protocol for Recycler's activities. Converters who recycle waste internally and subsequently use the produced recycled plastics, must also report these tonnages as Converter's Input and Output.

Monitoring will offer two levels of traceability:

Level 1 Traceability

Data for input and output recycled plastics for pre-consumer and post-consumer origin and European/non-European waste are recorded and audited.

Data Point	<u>Granularity</u>	<u>Counts</u> towards 10	Recorded & Audited	Extrapolated
		mio. tons	<u></u>	
European Pre-Consumer Waste Total	Per Polymer	Only PVC in	Х	
	From Sector	(VinylPlus)		
European Post-Consumer Waste Total	Per Polymer	Х	Х	
Input	From Sector			
Total European Waste Total Input	Per Polymer	(X)	Х	
	From Sector			
Non-European Pre-Consumer Waste	Per Polymer		Х	
	From Sector			

Non European Post-Consumer Waste	Per Polymer		Х	
i otal input	From Sector			
Non European Waste Total Input	Per Polymer		Х	
	From Sector			
European Pre-Consumer Waste Input	Per Polymer	Only PVC in	Х	
Recycling Operation	From Sector	construction (VinylPlus)		
European Post-Consumer Waste	Per Polymer	Х	Х	
Input Recycling Operation	From Sector			
Total European Waste Input Recycling	Per Polymer	(X)	Х	
Operation	From Sector			
Non-European Pre-Consumer Waste	Per Polymer		Х	
Input Recycling Operation	From Sector			
Non-European Post-Consumer Waste	Per Polymer		Х	
Input Recycling Operation	From Sector			
Non-European Waste Input Recycling	Per Polymer		Х	
Operation	From Sector			
Output Pre-Consumer Recycled	Per Polymer	Only PVC in	Х	
Plastic from European Waste	To Sector	construction (VinylPlus)		
Output Post-Consumer Recycled	Per Polymer	Х	Х	
Plastic from European waste	To Sector			
Output Pre-Consumer Recycled	Per Polymer		Х	
Plastic from non-European waste	To Sector			
Output Post-Consumer Recycled	Per Polymer		X	
Plastic from non-European waste	To Sector			
Total Recycled Plastic from European	Per Polymer	(X)	Х	
waste	To Sector			

Total Output Recycled Plastic from	Per Polymer		Х	
non-European waste	To Sector			
Total Output Recycled Plastic put on	Per Polymer		Х	
European Market	To Sector			
Total Output Recycled Plastic	Per Polymer		Х	
exported	To Sector			
Input Pre-Consumer Recycled Plastic	Per Polymer	Only PVC in	Х	
from Europe from European waste		construction (VinylPlus)		
Input Post-Consumer Recycled Plastic	Per Polymer	Х	Х	
from Europe from European waste				
Input Pre-Consumer Recycled Plastic	Per Polymer		Х	
waste				
Input Post-Consumer Recycled Plastic	Per Polymer	Х	Х	
waste				
Input Pre-Consumer Recycled Plastic	Per Polymer		Х	
waste				
Input Post-Consumer Recycled Plastic	Per Polymer		Х	
waste				
Total Input Recycled Plastic from Europe	Per Polymer		Х	
Total Input Recycled Plactic from	Per Polymer		v	
outside Europe	rei roiyiilei		^	
Total Input Recycled Plastic from European waste	Per Polymer	(X)	Х	
Total Input Recycled Plastic from non-	Per Polymer		X	
European waste				

Output Pre-Consumer Recycled	Per Polymer	Only PVC in	Х	
Plastic from Europe from European waste	To Sector	construction (VinylPlus)		
Output Post-Consumer Recycled	Per Polymer	Х	х	
Plastic from Europe from European waste	To Sector			
Output Pre-Consumer Recycled	Per Polymer		х	
Plastic from Europe from non-	To Sector			
European waste				
Output Post-Consumer Recycled	Per Polymer		Х	
Plastic from Europe from non-	To Sector			
European waste				
Output Pre-Consumer Recycled	Per Polymer		Х	
Plastic from outside Europe from	To Sector			
European waste	10 5000			
Output Post-Consumer Recycled	Per Polymer	Х	х	
Plastic from outside Europe from	To Sector			
European waste				
Total Output Recycled Plastic from	Per Polymer		Х	
Europe	To Sector			
Total Output Recycled Plastic from	Per Polymer		Х	
outside Europe	To Sector			
	D. D. L. M.	X		
Furge an waste	Per Polymer	Х	Х	
European waste	To Sector			
Total Output Recycled Plastic from	Per Polymer		Х	
non-European waste	To Sector			

Level 2 Traceability

Data for input and output recycled plastics are recorded and audited. Pre-consumer and postconsumer origin and European and non-European origin can be extrapolated.

Data Point	<u>Granularity</u>	Counts towards 10 mio. tons	Recorded & Audited	Extrapolated
European Pre-Consumer Waste Total Input	Per Polymer From Sector	Only PVC in construction (VinylPlus)	Х	
European Post-Consumer Waste Total Input	Per Polymer From Sector	Х	Х	
Total European Waste Total Input	Per Polymer From Sector	(X)	Х	
Non-European Pre- Consumer Waste Total Input	Per Polymer From Sector		Х	
Non-European Post- Consumer Waste Total Input	Per Polymer From Sector		Х	
Non-European Waste Total Input	Per Polymer From Sector		Х	
European Pre-Consumer Waste Input Recycling Operation	Per Polymer From Sector	Only PVC in construction (VinylPlus)	Х	
European Post-Consumer Waste Input Recycling Operation	Per Polymer From Sector	Х	Х	
Total European Waste Input Recycling Operation	Per Polymer From Sector	(X)	X	
Non European Pre- Consumer Waste Input Recycling Operation	Per Polymer From Sector		X	

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Non European Post- Consumer Waste Input Recycling Operation	Per Polymer From Sector		Х	
Non EU Waste Input Recycling Operation	Per Polymer From Sector		Х	
Output Pre-Consumer Recycled Plastic from European Waste	Per Polymer			Х
Output Post-Consumer Recycled Plastic from European waste	Per Polymer			Х
Output Pre-Consumer Recycled Plastic from non-European waste	Per Polymer			Х
Output Post-Consumer Recycled Plastic from non-European waste	Per Polymer			Х
Total Output Recycled Plastic from European Waste	Per Polymer			X
Total Output Recycled Plastic from non- European waste	Per Polymer			X
Total Output Recycled Plastic put on European market	Per Polymer To Sector		x	
Total Output Recycled Plastic exported	Per Polymer To Sector		Х	
Input Pre-Consumer Recycled Plastic from Europe from European waste	Per Polymer	Only PVC in construction (VinylPlus)		Х
Input Post-Consumer Recycled Plastic from Europe from European waste	Per Polymer	Х		Х

Input Pre-Consumer Recycled Plastic from outside Europe from European waste	Per Polymer		Х	
Input Post-Consumer Recycled Plastic from outside Europe from European waste	Per Polymer	Х	Х	
Total Recycled Plastic from Europe	Per Polymer		Х	
Total Input Recycled Plastic from outside Europe	Per Polymer		X	
Total Recycled Plastic from European waste	Per Polymer	(X)	Х	Х
Total Input Recycled Plastic from non- European waste	Per Polymer		Х	Х
Output Pre-Consumer Recycled Plastic from Europe from European waste	Per Polymer To Sector	Only PVC in construction (VinylPlus)		X
Output Pre-Consumer Recycled Plastic from Europe from European waste Output Post-Consumer Recycled Plastic from Europe from European waste	Per Polymer To Sector Per Polymer To Sector	Only PVC in construction (VinylPlus) X		X X
Output Pre-Consumer Recycled Plastic from Europe from European waste Output Post-Consumer Recycled Plastic from Europe from European waste Output Pre-Consumer Recycled Plastic from outside Europe from European waste	Per Polymer To Sector Per Polymer To Sector Per Polymer To Sector	Only PVC in construction (VinylPlus) X		x x x
Output Pre-Consumer Recycled Plastic from Europe from European waste Output Post-Consumer Recycled Plastic from Europe from European waste Output Pre-Consumer Recycled Plastic from outside Europe from European waste Output Post-Consumer Recycled Plastic from outside Europe from European waste	Per Polymer To Sector Per Polymer To Sector Per Polymer To Sector Per Polymer To Sector	Only PVC in construction (VinyIPlus) X		x x x x

Total Output Recycled Plastic from outside Europe	Per Polymer To Sector		Х	
Total Output Recycled Plastic from European waste	Per Polymer To Sector	(X)	Х	Х
Total Output Recycled Plastic from non- European waste	Per Polymer To Sector		Х	Х
Total Output Recycled Plastic exported	Per Polymer To Sector		Х	

Rules on Extrapolation

Extrapolation is completed by the data collector for

- Recycler's Output (all categories) based on Recycler's Input into Recycling Operation
- Converter's Output (polymer) based on Converter's Input

Extrapolation is completed by the Monitoring Secretariat for

- *Converters' Input* (European/non-European waste; pre/post-consumer split) based on Recyclers' Input into Recycling Operation

B. Audit protocol for data provided to CPA by Data Generators

All signatories of the CPA committed to have the reported data audited. Auditing of the data ensures that tonnages provided by Data Generators to the Monitoring Secretariat, via Data Collectors, are accurate, valid, and credible. To comply with this requirement an Audit Protocol has been developed. The Audit Protocol ensures that the Data Generators are compliant with all the CPA data requirements and that the tonnages they have provided are correct.

The audit protocol reflects both levels of traceability.

I The Audit Protocol is composed of two categories of documents:

1. Audit Framework (annex X1)

The audit framework ensures that all data collected is audited following the same standardised procedure, which in turn ensures audit harmonisation within the CPA. The framework should act as guidance on how to efficiently audit the requirements set by the CPA.

2. Audit Check List (annex X2)

The audit checklist is composed of a set of questions to be used by the auditor. This ensures that the audit addresses the necessary requirements within the framework and that the method of working by the different auditors is consistent.

II Incorporation of the Audit Protocol

Data Collectors can incorporate the Audit Protocol into their own audit system/scheme.

Established audit/certification systems/schemes can incorporate the Audit Protocol into their existing audit system/scheme.

To demonstrate correct incorporation, all systems/schemes must provide the CPA Monitoring Secretariat with the required evidence. The CPA will make a publicly available list of compliant systems/schemes and for information purposes only a list of authorised auditors.

III Audit Obligations

Data Generator

Data Generators are responsible for providing audit reports in line with the Audit Protocol or enabling the completion of such audits.

Data Collector

The Data Collector must facilitate the audit process by providing the audit infrastructure, information, and requirements to the data generator where necessary.

C. Quality assurance system for Data Generators

Data Generators must have a quality assurance system in place which safeguards the accuracy and robustness of the figures provided to the Data Collectors, and compliance with the Audit Protocol requirements.

Quality assurance must be developed via quality management systems in light of the requirements defined in *ISO 9001:2015 Quality Management Systems*.

I Requirements

Data Generators' management shall develop, implement and maintain a procedure to provide quality information to a Data Collector. Procedures must be available and actively communicated to all relevant personnel where roles and responsibilities must be clearly assigned and understood for the purposes of data supply to the CPA Monitoring system. Data Generators must determine the competence needed to fulfil the quality assurance system described and ensure that the relevant staff is competent on the basis of training, education and experience. Personnel must be designated responsible to contribute to the database tool of the Data Collector.

II Quality Assurance Procedure of the Data Generators must cover:

- 1. Input material must be booked according to specification sheet information which must be properly recorded internally and linked to a batch and supplier. Weight of the material must also be recorded.
- 2. Origin and type of waste must be correctly identified and supported by documentation: waste code, country of origin, etc.
- 3. Stocks must be correctly identified within the storage bay. Data Generators must have a system in place that records all incoming and outgoing material from storage. Physical inspection of stock should take place at least once a year to verify the IT system tonnage.
- **4.** Records of all material pulled from stock and sent to production are kept. Output material must be correctly identified. Weights and sales of output material must be recorded.

III Quantity reconciliation

Data Generators must maintain records of input and output material which guarantees the quantity reconciliation according to the Audit Protocol. The calculation will provide an overview of all inputs and all outputs of the Data Generators process within a period of one calendar year.

II Traceability

Traceability of material both within a data generator and throughout the whole value chain is essential to monitor the use of Recycled Plastic within a final product and origin of the waste (pre-consumer or post-consumer, depending on traceability level). Within the quality assurance procedures, Data Generators must include a traceability check of their process which ensures the right reporting of use of recycled plastics. In line with the traceability levels described in Chapter II, Section A, traceability should also be verifiable throughout different actors of the value chain which would ensure the right reporting of use of recycled plastics and origin of waste.

Data Generators should ensure traceability within their systems in line with the requirements of the audit framework. Traceability for chemical recycling can be ensured through a Mass Balance chain of custody as described in ISO 22095:2020. Specific requirements in the Audit Framework applicable to other recycling technologies than mechanical recycling will be determined at a later stage.

III Internal monitoring & corrective actions

Data Generators must have a procedure in place to monitor that the requirements set forth in the CPA Monitoring System Methodology are met at all times within their site. The procedure must allow the opportunity to identify areas of improvement within the internal processes. Findings of the monitoring must be documented and communicated internally along with any non-conformities or suggestions for improvements. Requests may be raised internally via personnel, or externally via costumers, stakeholders, etc. Data Generators must have a procedure in place to address these non-conformities and suggestions for improvements and implement, communicate and review changes if pertinent.

D. Generation of information for collected and sorted plastic waste

I Introduction

The main purpose of monitoring quantities of collected and sorted waste is to evaluate the remaining potential for increasing the volume of plastic waste sent to recyclers. It is the view of the CPA that preconsumer material is a stream that all actors minimise to the greatest extent possible, and that due to the quality of this waste it is in general largely recycled. As such the untapped potential lies in the significant volumes of collected post-consumer plastic waste that are not today sent to recyclers. As a logical conclusion from this view, the CPA will not seek to monitor the collection and sorting of preconsumer waste.

Team and Timing

A dedicated team of volunteers from the CPA will be in charge of generating the information for collected and sorted plastic waste in line with the methodology described hereafter.

This team is composed of 1 representative of each sector represented in the CPA and 1 representative of PlasticsEurope.

Each year, it delivers the targeted data to CPA Monitoring Secretariat in line with the timing set for the annual report of the CPA. Data is to be reported for Europe and for each country under the given format, specifying all sources of information, in particular national ones, if relevant.

Further elaboration on definition of Collected Waste

For the purpose of the CPA monitoring, Collected Waste is defined as "any plastic waste that is collected for any recovery or disposal operation". It therefore includes both waste plastic collected for recycling and waste plastics remaining in the residual waste fraction destined for energy recovery or disposal. It gives an indication of the total tonnage of waste plastic that is potentially available for treatment and recycling.

This definition is the same as the one used by Packaging and Building & Construction sectors in the State-of-Play report on collection and sorting.

Official statistics, however, typically only report that part of the waste which is collected for recycling and not the tonnage in the residual waste fraction. This latter concept of "Collected Waste for Recycling" is the one used by Agriculture, EEE and automotive sectors in the State-of-Play report. However, for monitoring we will use the same definition for all sectors.

Further elaboration on definition of Sorted Waste

Sorted Waste is defined as "plastic waste delivered to Recyclers in Europe or outside". The main difference between the sorted waste figure and the input figure to Recycler's Total Input in Europe is export of plastic waste or where the Collected Waste had none plastic components.

Some Recyclers may carry out additional sorting activities and any loss from these activities or process losses will be picked up in the difference between a Recycler's Total Input and Output of Recycling Process figures. This is particularly relevant for Recyclers of mixed polymer derived plastics from the automotive and EEE sectors.

II Methodology to generate data on post-consumer Collected Waste

Introduction

When it is collected by a waste collector (private or public), plastic waste most often finds itself mixed with other kinds of waste, even in separate collection systems. This may be either other materials used in the same product (e.g., ELVs, WEEE, etc), or other used products collected together with plastic waste (for instance food waste or metal packaging mixed with plastic packaging). In only a limited number of cases, such as plastic bottles collected through a DRS or industrial plastic packaging (drums, films, etc) is plastic wasted collected alone.

In such conditions, the quantity of plastics contained in products collected at the end of their lives is often impossible to be directly measured or weighed by waste collectors. The best available option to evaluate this quantity is therefore through the evaluation of the quantities of waste containing plastics and the estimation of the share of plastics in that waste.

The quantity of collected waste (containing plastics) can be provided:

- by measurement by waste collectors of quantities of waste they collect
- or by calculation.

Calculation is done by estimating the quantity of products arriving at the end of life in a given year on the basis of average life-span of these products and the quantities of that product put on the market the previous year. For products with a short life (< 1 year), such as most packaging, it can be assumed that the quantity of collected waste in a given year is equal to the quantity of packaging put on the market in the same year.

The share of plastics in Collected Waste, as well as the detailed composition by individual polymers, is accessible:

- through typical analysis of the composition of the waste
- or by assuming it is equivalent to the share / composition in the product when it was first put on the market
- or by assuming that it is close to the share / composition in the product as manufactured.

These methodologies are those used to build available statistics (when reporting obligations exist for some waste streams) or specialised reports. It is therefore proposed, in a first implementation phase of the CPA system, to use these available data, according to their availability and presumed accuracy, making clear, for each type of waste and country, which data sources and assumptions are used.

Where data do not exist, in particular at national level (for instance polymer split), then estimations will be made based on information available from other countries or use of information given in the CPA state of play report.

Packaging

Plastic packaging is the only plastic type of which waste management is subject to official statistics. In particular, Member-States report to the European Commission the generation in their territory of post-consumer plastic packaging waste from any origin (household, industry & commerce).

In almost all countries, waste generation is evaluated through the estimation of plastic packaging put on the market the same year. In only 2 of them, it is evaluated through the estimation of collected quantities (mixed collection + separate collection).

If necessary, we propose using this official Eurostat data, both at an EU and national level, for the evaluation of quantities of collected plastic packaging waste in the EU-27. For the UK, we will request similar data from DEFRA.

However, European statistics are generally published with a delay of at least 2 years and the data can be known quicker by collecting it from PROs or plastics associations within each country. If data is expedited directly from sources within each country, then we can expect to have it by around October / November after the year in question.

We therefore propose surveying organisations / associations within each country to collect the most recent data and to use Eurostat data to complete any data gaps from the survey.

The survey would request data on

- 1. the total plastics packaging placed on the market (or generated) and
- 2. data by the polymer types monitored by the CPA.

Automotive

Automotive waste is regulated at EU level by ELV directive, which requests member-states to report quantities of End-of-Life Vehicles (ELVs) entering authorized treatment facilities in their own territory.

It is known that not all ELVs are treated by authorized treatment facilities and that there is a significant number of vehicles of `unknown whereabouts'. These are vehicles that are deregistered but without a Certificate of Destruction issued, or available to the authorities, for this vehicle, and also with no information available indicating that the vehicle has been treated in an authorised treatment facility (ATF) or has been exported legally as a second-hand vehicle (or ELV if legally applicable). Therefore, even if contributing to the generated waste, these ELVs with unknown whereabouts will not be considered in the scope of Collected Waste. Automotive Collected Waste will be limited to ELVs sent to ATFs. Automotive waste can also arise from repair shops but cannot be estimated at this point.

Agriculture

Although there is no specific legislation for the end-of-life management of non-packaging agricultural plastics, the actors of the agriculture sector have voluntarily organized, in several countries, specific collection scheme of agriculture plastic waste. In countries where a national collection scheme is in operation, reasonably good quality information is available about the volumes being collected and recycled. However, the absence of a national collection scheme does not mean than there is no collection and recycling going on but the lack of information or monitoring system makes it difficult to assess their actual performance in terms of the end-of-life management of these plastics.

In these conditions, to assess the total quantity of collected agricultural plastic waste, be through a nationally organized scheme or through individual collection systems put in place by farmers and growers, we propose to consider that it can be assumed as equivalent to the total quantity of agricultural plastic products put on the market. This data is estimated and can be provided by APE Europe.

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Electrical and electronic waste

Commission Implementing Regulation 2017/699 establishes a common methodology for the calculation of the quantity of WEEE generated in each Member State, the Commission makes publicly available the WEEE calculation tools customised for each one of the Member States (<u>https://ec.europa.eu/environment/waste/weee/data_en.htm</u>). However it was last updated in 2014.

Some countries also generate national data and the Global e-waste report provides figures for Europe and some countries. The tonnages of WEEE generated can therefore be assessed, either at European level or at national level when available, to provide an estimate of overall quantities of plastic waste collected and associated quantities of each polymer.

Official statistics (Eurostat) also report quantities of WEEE collected through dedicated channels (for the purpose of recycling). These quantities will not be considered as "collected" for the monitoring purpose, but they can be used for the further evaluation of quantities of sorted waste.

Building & Construction

The CPA state-of-play on collected and sorted has reported on the lack of reliable official data on B&C waste.

As with that report, we propose to use the PlasticsEurope data on collected post-consumer plastic waste, both at EU level and at national level when they are available for monitoring this waste stream.

III Methodology to generate data on sorted plastic waste

I Packaging

Eurostat gives Plastic packaging recycled quantities, which can be currently considered as "sent to recycling" as they are typically a combination of weights of plastic leaving sorting centres or delivered to Recyclers (including exports).

When the new EC measurement point for recycling is implemented by Member States, the data will need to be obtained from organisations within each country (such as EPR schemes or plastics associations), or where this is not available, the figure reported to the EU will need to be adjusted to add back on losses prior to extrusion. This is due to the measurement point for recycling moving from the input to the recycling facility to the weight entering the extruder (or flake once it reaches end of waste status).

As for data on waste generated, more recent data than those published by Eurostat can be requested from sources identified for each country, concerning the overall tonnage of plastic packaging sent for recycling (inside or outside of the Europe) and possibly additional data, where this is available, based on the polymer splits being monitored in the CPA. Data on exports outside of the Europe will also be requested. Where this granularity of data is not available, we will make estimations based on data available from other countries / research work (such as the survey carried out in for the CPA state of play report).

Where necessary, plastic packaging exported outside of the Europe can be estimated and removed from the data to calculate the tonnage supplied to Recyclers in the Europe (although this would just act as a sense check as inputs to the Recycler are a key data capture point). The export tonnage can be based off an assumption of what percentage of HS code 3915 exported from the Europe is packaging.

Automotive

More specifically, sorted waste in the automotive sector is pre-treated waste sent to Recyclers.. This includes shredding of automotive waste to obtain separate streams of metals, plastics etc.

According to CPA state-of-play on collection & sorting, ~ 33% of plastic waste contained in ELVs sent to authorized treatment facilities pass, in average in Europe, through the treatment process and will either (1) be recovered from ASR and delivered to treatment plants or (2) be supplied directly to Recyclers (plastic removed pre-shredding + plastic generated from repair shops).

Unless more specific national data are available, we propose to use this average European ratio to estimate, at a country level, the quantities of sorted plastic waste generated by ELVs (as reported in Eurostat).

Agriculture

According to the state-of-play based on APE Europe data, 75% of the agricultural plastic waste collected for recycling (expressed as neat tons) are sent to Recyclers. Unless more specific national data are available, we propose to use this average European ratio to estimate, at a country level, the quantities of sorted plastic waste generated by agricultural waste.

WEEE

More specifically, sorted waste in the EEE sector is mixed and single polymer plastic fractions from WEEE pre-treatment plants sent as inputs to Recyclers.

According to the state-of-play, 79,5% of the plastic waste contained in household WEEE collected by ERP schemes, represented by WEEE Forum (3,4 Mt) are, in average in Europe, sent to Recyclers. If we consider the total quantity of WEEE declared as collected by Member-States (4,4 Mt), this ratio could be adjusted at ~ 60%.

Unless specific data can be provided by PROs for some countries, we propose to use this average European ratio to estimate, at national level, the quantities of sorted plastic waste (by applying it to the quantity of collected WEEE declared by the country in Eurostat)

WEEE plastic exported outside of the Europe need to be added to that recorded as delivered to Recyclers within the Europe. The export tonnage can be based off an assumption of what percentage of HS codes under 3915 is exported from the Europe is WEEE derived. After the Basel amendment comes in at the start of 2021, exports are likely to be relatively small and limited to single polymer fractions free of POPS.

Building & Construction

PlasticsEurope data show that, in average at European level, \sim 26% of plastic waste collected from building & construction are sent to Recyclers.

At the current stage, we propose to use also for monitoring purposes the PlasticsEurope data on quantities of plastic waste sent to recycling, both at EU level and at national level when they are available.

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Chapter III – Data collection rules

A. Task of the Data Collector

The Data Collector is tasked with collecting data from Data Generators.

The Data Collector will then process the audited tonnages and/or support the auditing of the unaudited tonnages.

The Data Collector will consolidate all collected tonnages in accordance with the required data points (Chapter II, Section A and Annexes Z1 and Z2).

The Data Collector will report the collected tonnages to the Monitoring Secretariat annually. The Data Collector will also need to report its audit percentage following the requirements set out below, and a list of the Unique Identifiers.

In order to become a Data Collector, the entity must fulfil the requirements listed below and complete the application forms A and A1).

B. Requirements to be Data Collector

The Data Collector must:

I Governance and Structure

- 1. Be a legal non-profit entity registered in one of the member states of the EU or the UK.
- 2. Be compliant at all times with EU competition law.
- 3. Have transparent governance: The composition of the Board of Directors and the ownership of the Data Collector is publicly available information.
- 4. Have an appointed person (manager/coordinator) that can solve issues and problems connected to the Data Collector platform, maintain a critical eye on the platform's development and credibility.
- 5. Appoint a representative who will act as the unique contact point between the Monitoring Secretariat and other CPA Data Collectors. This person should be mandated to act on behalf of the Data Collector. The representative is expected to act in a manner that enhances the integrity of the Data Collector and the CPA, not gain an improper advantage through information derived from its position within the CPA. The representative must respect the confidentiality of the CPA and not provide information received through its role that is not available to the general public, unless prior written authorisation is given for its release. Specifically, information obtained through discussions held within the Monitoring Secretariat relating to CPA matters is confidential and is not to be disclosed.
- 6. Maintain up to date, publicly available points of contact i.e. email accounts, phone numbers
- 7. Be compliant with the CPA Code of Conduct for Data Collectors to sign upon approval of their application.
- 8. Not use the collected data for commercial purposes.

II Auditing

- 9. Undergo a mandatory system audit every year.
- 10. Fulfil the Audit obligations described in Chapter II, Section B.III.
- 11. Demonstrate how the data it will collect will be audited according to the CPA Audit Protocol. Each Data Collector must conduct effective planning to ensure all the data it will report is audited.
 - i. The Data Collector can either process the registered audited tonnages directly from Data Generators, or support the auditing of the registered unaudited tonnages, or a combination of the two.
 - ii. If the Data Collector incorporates the Audit Protocol into its own audit system/scheme, the requirements described in the "Audit System Quality Control" must be followed
- 12. Deliver its annual audit percentages to the Monitoring Secretariat alongside the reported tonnages. The audit percentage should be provided by polymer for the Recycler's Total Output and the Converter's Total Output, as well as the split between Europe and export.
- 13. Ensure the collection and management of the audit reports from the Data Generators.
- 14. Strive to reach an audit percentage of 100% by 2025.
- 15. Provide auditors with a list of all Data Generators reporting to the Data Collector's system (to avoid double counting in accordance with the Audit Framework).

III Data Treatment

- 16. Check that the Data Generators' systems are sufficiently proficient to deliver the data as required (see Audit Framework)
- 17. Collect the data via a robust and secure IT system. Best practice and state of the art security measures must be used. Software security versions and features must be kept up to date.
- 18. Keep data servers protected and maintained by a trustworthy entity
- 19. Ensure that the data are collected, processed, audited, and reported in full compliance with EU competition law.
- 20. Data should only be available to authorised personnel, who must be clearly named and defined. Signature of non-disclosure agreements/confidentiality clause in labour contract between authorized personnel and Data Collectors is required.
- 21. Not use the data in a for-profit context in any way. However, the data can be used for other non-profit purposes such as proof of fulfilment of industry pledges/commitments or to fulfil mandatory legal requirements.
- 22. Acknowledge that the collected data remains the Data Generators property.
- 23. Store and process data in compliance with EU GDPR rules.

C. Compliance and Withdrawal

If the Data Collector breaches or is no longer fulfilling the requirements of Section B, it will be given 4 months to put in place the necessary corrective actions. In case it fails to do so, it will cease to be a Data Collector following instruction from the Monitoring Secretariat approved by the Monitoring working group (Chapter IV. In case the entity ceases to be a Data Collector, it will inform all its Data Generators in writing that it will no longer serve as a Data Collector. Page 28 of 33

D. Quality assurance system for data collection

Data Collectors must ensure there is a quality assurance system in place in order to guarantee a structured development, review and maintainance of the robustness and credibility of their database.

Data Collectors must have procedures in place to assure the quality of the information within the database and the compliance with the Data Collectors rules set forth in section A, B and C.

I Database Quality Control

Data Collector must establish procedures to ensure the quality and rigour of their database. Procedures must ensure the development and maintenance of a structured and user-friendly database in compliance with the requirements and rules set forth in section III.A and III.B. Data Collectors must review new data inputs regularly and verify its consistency If non-conformities are identified, Data Collectors must flag that data for review.

II Data Corrections with Data Generators

Data Collectors must flag all inconsistent or suspisious data submitted to the database and have a process in place to address all non-conformities.

Data Collectors must check the plausability of the submitted figures. Indication of non-conformities may be:

- High inconsistencies with submitted data;
- Output volumes higher than input volumes;
- Missing supporting documentation;

Data Collectors must review the available documentation and last audited results presented as supporting documentation. Data Collectors can also contact the responsible auditor to have a broader understanding of the audit results.

If the non-conformity is not clarified, Data Collector must contact the data generator and provide the opportunity to review, amend and/or justify the volumes. During this phase, the data generator may also provide additional documentation.

Data generators and auditors should pay special attention to the following possible reasons for inconsistent or suspicious data submitted to the database:

- (For Recyclers) Incorrect estimate of the contamination
- Double counting
- Input error
- Rejected loads of material

If clarification of the non-conformity is not possible, the Data Collector must disregard the concerned volumes when reporting to the Monitoring Secretariat.

III Audit Quality Control

Data Collectors must ensure that the audit system they use is CPA compliant. Data Collectors must have a documentation in place describing at least:

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- Description and scope of their audit system;
- How the CPA Audit Protocol is incorporated into their activities to explain compliance;
- Description of roles and responsabilities of the organisation, members and staff;
- Procedure to review, approve and adopt updates on the audit system. This procedure should be publically available for transparency.

Data Collector must have a clear description of the responsibilities and procedures to review and maintain the Audit Protocol.

- The group of persons/taskforce/committee responsible of reviewing and mainaining the audit system must be identified.
- The group must have an active participation and meet regularly.
- The group must be open to third party review from stakeholders. There must be a procedure in place to gather and process external feedback. The group should be open and count with a procedure in place to accept new participants and guests.

IV Auditor Quality

Data Collectors running audits must ensure that they have a system in place to determine and maintain the competence, impartiality and independence of the auditors and certification bodies in accordance with section 4 of Annex X.

Audit system procedures must consider personal behaviour, education, skills and qualifications and work experience as part of the auditor's requirements. Data Collectors may also build on the auditors competence by offering trainings and regular communication. Competence of the audit also increases via audit experience.

Additionally, auditors must be impartial and free of conflicts of interest. Auditors must keep an active role in ensuring impartiality continously including its activities and relationships.

V System Audit

All signatories of the CPA agreed to the monitoring system being audited. Data Collectors must provide evidence of the annual system audit to the CPA Monitoring Committee via signed letter by the third-party auditor. A system audit includes:

- 1. Tonnage Verification
 - 1.1 A review of the consolidated data.
 - 1.2 Spot check review of the Data Generators' audit reports.
- 2. Verification that the Data Collector is compliant with the requirements to be a Data Collector (Section B, I Governance and Structure).

VI Complaints and Appeals

Auditors and Data Collectors must have a system in place to receive, address and store complaints and appeals regarding the audit protocols or audit results. Data Generators or other parties can submit these inquiries to auditors or Data Collectors who should maintain a record. If appeals and complaints are not, or cannot be, resolved by the auditors, the issuer can address them to the Data Collector directly.

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Chapter IV – Monitoring Secretariat rules

The CPA Monitoring working group has final responsibility for the monitoring system for as long as the CPA is active. To oversee the implementation of this methodology and final aggregation and reporting of figures the Monitoring Secretariat is appointed by the Monitoring working group from within its members.

The Monitoring Secretariat is in charge of checking the validity of the entire data and information submitted by the Data Generators via chosen Data Collector and reviewing the analysis of the Collected Waste and Sorted Wasted.

A. Tasks of the Monitoring Secretariat

The Monitoring Secretariat is responsible for the following actions:

- Review applicant Data Collectors and approve their ability to comply with CPA methodology. The Monitoring Secretariat will impartially review all Data Collector applications according to the pre-established requirements (see III. B). Applications will demonstrate that the entity seeking to be a Data Collector meets the requirements set out in this methodology.
- 2. Should a Data Collector cease to meet these requirements, the Monitoring Secretariat will require the Data Collector to put in place the necessary corrective actions within 4 months from notice. In case of failure to do so, Monitoring Secretariat may remove the status of CPA Data Collector from the entity, at which point all Data Generators concerned will be informed with appropriate notice.
- 3. Collect once per year all required data from Data Collectors (aggregated tonnages, audit percentages, unique identifiers from each Data Collector).
- 4. Review and compare data from different data collectors and check for any potential duplications by comparing the lists of Unique Identifiers provided and via any other methods where available.
- 5. If any data and/or information is found incorrect or missing, the Monitoring Secretariat will inform the Data Collector with a timeframe for response. In the absence of corrected figure/response, the data will be left out of the aggregated tonnages.
- 6. Aggregate the tonnages provided by the different Data Collectors for all data points and proceed, for data reported according to traceability level 2, to the necessary extrapolations
- 7. Develop and maintain a publicly available list of approved compliant audit and certification systems/schemes and, for information purposes only, a list of authorised auditors). Check and confirm that the data audit and certification practices of each Data Collector complies with that list
- 8. Verify that system audit report provided by each Data Collector confirms compliance with CPA methodology and therefore tonnages may be used.
- 9. Verify that total numbers are competition law compliant and can be published by CPA.
- 10. Review the audit percentages annually and recommend action where needed to reach the objective in the CPA declaration that the system and data are audited.

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- 11. Present draft figures to CPA Monitoring working group which will deliver the final report to Steering Committee and European Commission, with the view to have it published at the annual CPA General Assembly. Final report can also be shared with a wider audience via usual forms of communication in line with CPA decision making procedures
- 12. Considers alternative data sources provided by CPA signatories to give an overview of the full recycled plastics market in Europe; this information will provide a counterpoint to the data generated directly by the CPA monitoring system. Monitoring working group will decide whether to publish this contextualizing information alongside the reported data.
- 13. When updates to this methodology are deemed necessary, requests should be made to the CPA Monitoring Working Group to review the document in line with CPA decision making processes.

B. Composition and decision-making process of the Monitoring Secretariat

• Monitoring Secretariat is composed of up to 7 persons. Persons must be members of the Monitoring working group, having relevant expertise, experience, and availability to perform the tasks assigned to the Secretariat.

• To become members of the Monitoring Secretariat, volunteers put themselves forward and are then agreed_by the Monitoring working group for a period of 2 years.

In order to avoid conflict of interest, they cannot be directly involved in a data collection system for the CPA.

Note 1: Direct involvement refers to being employed or contracted, occasionally or permanently in the operations and day to day management of a data collector.

• All members of the Monitoring Secretariat must sign a Non-Disclosure Agreement with relation to the data and information viewed during the operation of the tasks assigned to the Secretariat.

- A conflict of interest declaration must be made by members of the Monitoring Secretariat
- Members of the Secretariat must agree on a chair, who coordinates with the chair and vicechair of the Monitoring Working Group.
- Recommendations from the Secretariat should be consensus based. Final decisions will be taken by the Monitoring WG in accordance with the working rules of the CPA.

Glossary

- MS Member State (Reference to 27-member states of the European Union).
- PRO Producer Responsibility Organisation
- LDPE Low Density Polyethylene
- LLDPE Linear Low Density Polyethylene
- HDPE High Density Polyethylene
- PP Polypropylene
- PA Polyamide plastic (Nylon)
- PPA Polyphthalamide
- ABS Acrylonitrile butadiene styrene
- PC Polycarbonate
- PMMA Poly(methyl methacrylate) (Acrylic)
- PVC Polyvinyl chloride
- TPU Thermoplastic polyurethane
- PET Polyethylene terephthalate
- ASA Acrylonitrile styrene acrylate
- PUR Polyurethane
- PS Polystyrene
- PE Polyethylene/polythene
- POM Polyoxymethylene (Acetal)
- EPS Expanded PolyStyrene
- SAN Styrene acrylonitrile