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REAL Industrially Compostable Products Scheme Rules

according to

BS EN 13432

If applicable, in connection with

BS EN 14995

(Edition: June 2024)

Foreword

Renewable Energy Assurance Limited (REAL) is a wholly owned subsidiary of a not-for-profit organisation, the Association for Renewable Energy and Clean Technology (REA), carrying out a range of third-party certification and consumer protection activities. REAL owns and administers the Compostable Materials Certification Scheme (CMCS).

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REAL appoints certification bodies to provide certification services, organisations with product certification expertise within their businesses. The certification bodies confirm to REAL whether products meet the requirements for use of the REAL 'Industrially Compostable' certification mark. The certification bodies operate according to EN ISO/IEC 17065 or EN ISO/IEC 17020 and show compliance by holding and maintaining such accreditation.

Products certified under the CMCS can be certified as meeting the requirements of this scheme and/or the 'REAL Home Compostable Products' scheme. More information on the 'REAL Home Compostable Products' scheme can be found on www.compostablematerials.org.uk.

This certification scheme is maintained by REAL and will be continuously improved, when applicable. For this, REAL will appoint a committee of dedicated experts with the certification bodies participating and a group of interested parties in order to harmonise the scheme.

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1 SCOPE

The "REAL Industrially Compostable Products" is a certification scheme for the United Kingdom, which provides services to producers for the independent assessment and labelling of industrially compostable products.

The "REAL Industrially Compostable Products" scheme provides consumers with assurance and confidence in certified products. It also provides consumers with a platform to check the certification status of products and identify the appropriate end-of-life options on the website: <u>www.compostablematerials.org.uk</u>.

1.1 Product types

This certification scheme applies for the following products:

1.1.1 Shopping bags	1.1.2 Waste bags	1.1.3 Packaging	1.1.4 Films
1.1.5 Tableware	1.1.6 Cups	1.1.7 Trays	1.1.8 Food containers
1.1.9 Straws	1.1.10 Cutlery	1.1.11 Coffee capsules	1.1.12 Lids
1.1.13 Teabags	1.1.14 Coffee filters	1.1.15 Coffee pods	1.1.16 Cling film
1.1.17 Dental floss	1.1.18 Tea filters	1.1.19 Cosmetic face masks	1.1.20 Coffee stirrers
1.1.21 Wipes	1.1.22 Tablecloths	1.1.23 Single-use place mats	1.1.24 Baking paper
1.1.25 Plant pots	1.1.26 Sponges	1.1.27 Bottles	1.1.28 Disposable gloves
1.1.29 Fruit and vegetable labels	1.1.30 Napkins	1.1.31 Plastic boxes	1.1.32 Cotton pads

NOTE 1: Any non-disintegrable component of a product is not permissible or compliant with this scheme, for example, metal clips on teabags are not permissible or compliant with this scheme.

NOTE 2: Certification does not cover the possible presence of toxic or non-biodegradable residues on cosmetic face masks, wipes, sponges, disposable gloves, or cotton pads. Certificate holders will be required to make this clear to customers. The certification body will make this requirement clear in the contracts at the time of application and in the certification reports.

NOTE 3: The scheme does not assess compliance with Regulation (EC) No 1935/2004 for Food Contact Materials, therefore, it is not possible for the terms 'food contact' or 'contact' to be included in the name of the product on the certificate.

1.2 Product units

Product units are distinguished as easily manually separable units and not easily manually separable units.

- Easily separable units (units according to BS EN 13432).

These products will be processed as one product unit. If both parts of a product unit are certified separately, both parts must independently show conformity with this certification scheme. Therefore, the calculation of potential additives will be required for each single unit. Nevertheless, the complete and un-separated product unit needs to meet the requirements as well.

- Not manually separable units

These products will be processed as one unit. Any additives contained are related to the whole unit.

NOTE: Easily separable units refer to products like cups with lids. Not manually separable units refer to products like labels on packaging. The certification bodies will determine whether the product will be assessed as components or as one unit.

1.3 Definition of types, subtypes, and product families

Products relevant to certification, as listed in section 1.1, are defined as types. An individual certificate will be issued for each type.

A subtype is defined as the (end) product that is different based on dimensions. Different sub-types are grouped into one product family of alternative dimensions or alternative compositions. Multiple subtypes can be grouped onto one certificate.

NOTE: There is no legal right to receiving a certificate or any other confirmation of conformity.

1.4 Applicants

Applicants can be both initial applicants (businesses applying for certification), or certificate holders (businesses manufacturing or distributing certified products) according to this scheme.

2 TEST AND CERTIFICATION SPECIFICATIONS

For industrially compostable product certification, products are assessed against and certified to the standard:

BS EN 13432:2000 ('Packaging – Requirements for packaging recoverable through composting and biodegradation').

If applicable, products can also be assessed and certified in parallel against:

BS EN 14995:2006 ('Plastics – evaluation of compostability – Test scheme and specification').

The obligation to comply with laws and regulations governing the respective products is in no way affected by this certification scheme.

3 PRODUCT REQUIREMENTS

According to BS EN 13432 and (if applicable) BS EN 14995, the following requirements apply:

- Compliance with the threshold values named in Table A.1 in BS EN 13432 and the control of constituents mentioned in Section 4.1 of BS EN 13432.
- Per- and polyfluoroalkyl substances (PFAS) not intentionally added.

NOTE: PFAS's are defined by the OECD as 'fluorinated substances that contain at least one fully fluorinated methyl or methylene carbon atom (without any H/Cl/Br/I atom attached to it), i.e., with a few noted exceptions, any chemical with at least a perfluorinated methyl group (–CF3) or a perfluorinated methylene group (–CF2–) is a PFAS'.

NOTE 2: For initial applicants, a declaration is required in the signed and completed application form. For producers with already certified products, a transition period is allowed and will cover the remaining period of certificate validity.

- Ultimate biodegradability based on testing mentioned in the Normative References of BS EN 13432. Evaluation criteria of Annex A.2.2 of BS EN 13432 apply.
- After composting for no more than 12 weeks, no more than 10% of the original dry weight of a test material shall fail to pass through a > 2 mm fraction sieve. Evidence must be demonstrated via a test according to EN ISO 16929.
- The germination rate and plant biomass of two plant species shall be more than 90% of those from the corresponding blank compost according to OECD 208 with the modifications stated in BS EN 13432, Annexes A.4 and E.
- Additives present in a manufactured item at concentrations less than 1 % of dry mass of the finished item must be harmless for the composting process.
- The total sum of the organic compounds for which biodegradability need not to be determined may not exceed 5% of mass.
- Residues remaining in packaging or substances that may be disposed together with the product must be suitable for composting.

4 TESTING

4.1 General information

To carry out the inspections and tests necessary for the evaluation and certifications, the certification body uses testing laboratories it has approved in line with its accreditation according to EN ISO/IEC 17065 or EN ISO/IEC 17020 and based on EN ISO/IEC 17025.

The certification body shall have a monitoring system in place to demonstrate competence and quality of the approved testing laboratories in accordance with its accreditation.

Test reports submitted for certification, verification and/or renewal shall be in compliance with EN ISO/IEC 17025. Additional test report requirements of the test method standards apply.

Test reports according to other certification systems could be accepted, if they meet the requirements of this certification scheme and that testing laboratory is approved by the respective certification body.

All documents must be submitted in English.

4.2 Types of tests

Applicants provide the testing laboratories and the certification body with samples, as required; applicants shall bear all costs applying for sampling, transport, testing, and similar.

4.2.1 Initial test

The initial test is a type test intended to establish whether the products meet the requirements according to Section 3 of this certification scheme.

4.2.2 Verification test (Control test)

All certified products undergo verification testing by means of IR spectroscopy, thick-ness/grammage and chemical characterisation.

The certification body alerts the certificate holder about upcoming verification tests due.

4.2.3 Additional testing

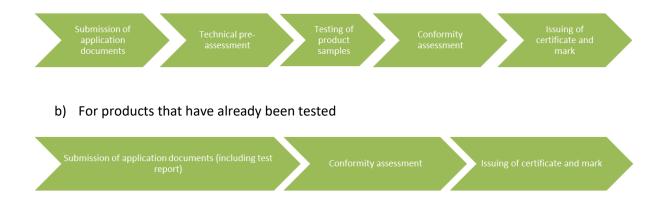
Additional testing may be required if any changes are intended for a certified product that may have an influence on conformity with the underlying requirements.

The certification body will assess if such additional testing is required.

5 APPLICATION PROCESS

5.1 Process flow

a) For products that have not yet been tested



5.2 Initial application documents

Applicants (producers of compostable products or sub-licensees) submit the following application documents to the scheme owner and the certification body:

- Signed and completed Application Form (and Data Sheet attached)

- Safety Data Sheets/Material Safety Data Sheets according to REACH for all substances used to determine the additives' suitability for composting
- Up to date (maximum three years old by default) test report (if the product has already been tested for the scope of this scheme at an approved testing laboratory)

NOTE 1: The certification body will check if the test report is still valid through seeking confirmation from the laboratory and will seek confirmation from the applicant that the product has not changed since testing.

NOTE 2: The certification body can only accept test reports from laboratories approved by them for the REAL Industrially Compostable Products scheme.

- Test reports or certificates for materials, intermediates, or additives (if components of the product have already been tested and/or certified for the scope of this scheme)

5.3 Technical pre-assessment

- 5.3.1 Where an up-to-date test report for the final/end product is not available, the applicant can apply for a technical pre-assessment.
- 5.3.2 The certification body determines whether the product is suitable for certification and whether any tests can be omitted from the full suite of tests specified in the applicable standard.
- 5.3.3 If the applicant does not wish to apply for a technical pre-assessment, the applicant can decide whether to proceed with testing samples of their product at one of the approved testing laboratories for the full suite of tests. Certification is only possible on the basis of positive test results. Therefore, if the applicant does not wish to apply for a technical pre-assessment or to send product samples for testing to an approved testing laboratory for the full suite of tests, it will not be possible to certify the product under this scheme.

NOTE: Only the tested product can be certified without technical pre-assessment. It will not be possible to certify a range of products in the event an applicant proceeds to testing without preassessment. It may also not be possible to certify a product if testing takes place without preassessment, as the Certification Body will not have determined the required tests in advance.

6 VERIFICATION PROCESS

6.1 Verification procedures

- 6.1.1 Verification testing is performed in predefined intervals. During the term of certificate validity, the certification body alerts the certificate holders to when testing is due for a product three months prior to the tests due. The certification body sends the certificate holder a written request to supply the samples required for testing to a specified address. The sample quantity for each product is assessed by the certification body and confirmed to the applicant with the written request. Five samples are submitted for testing with one of the five tested.
- 6.1.2 Samples of the certified product are tested for IR spectroscopy and thickness/grammage once a year at the approved laboratory where initial testing was performed or the certification body (in-house) where initial IR and thickness/grammage testing was performed. If the samples are tested at an approved laboratory, the certification body informs the certificate holder that the

laboratory needs to send the test report(s) directly to the certification body which issued the respective certificate. The certificate holder must confirm this to the laboratory.

- 6.1.3 These samples are taken from various production sites and marked accordingly. If more than three production sites are available, samples are submitted from alternating sites on the basis of \sqrt{n} . The number is rounded up to the next integer.
- 6.1.4 If the certificate holder fails within 30 calendar days of receipt of the notification to send in samples to the laboratory, the certification body will send another request and eventually will initiate its own procedures for suspension or cancellation.
- 6.1.5 The results are assessed by said certification body.
- 6.1.6 Samples of the certified product are tested for chemical characterisation according to Table A.1 of BS EN 13432 once during the period of certificate validity. The certification body informs the certificate holder that the laboratory needs to send the test report(s) directly to the certification body which issued the respective certificate. The certificate holder must confirm this to the laboratory.
- 6.1.7 The results are assessed during the conformity assessment for certificate renewal.

7 RENEWAL PROCESS

7.1 Process flow



7.2 Application procedures

7.2.1 The certification body alerts the certificate holder six months prior to when chemical characterisation is due for a product renewal. The certification body sends the certificate holder a written request to supply the samples required for testing to a specified address and alerts the certificate holder to hand in an application for renewal.

NOTE: The timeframe for alerting the certificate holder will differ if any of the applicable standards have been updated during the period of certificate validity.

- 7.2.2 An application for renewal should be submitted sufficiently in advance prior to certificate expiry.
- 7.2.3 Any producer who intends to apply for renewal of certification can request an application form from the scheme owner or download the relevant form(s) from the scheme owner's website. The relevant application form is required to be completed with the attached data sheet.

7.3 Application for renewal documents

- 7.3.1 Applicants submit the following documents to the scheme owner:
 - Signed and completed Application Form (and Data Sheet attached)

- Verification test reports (IR spectroscopy (if performed at an approved laboratory), thickness/grammage, and chemical characterization from an approved testing laboratory of the respective certification body which issued the respective certificate(s))
- 7.3.2 The scheme owner reviews the application for renewal documents before supplying them to the respective certification body, which issued the respective certificate(s), for the conformity assessment.

8 AMENDMENT PROCESS

8.1 Application procedures

- 8.1.1 The certificate holder alerts the certification body as soon as they know they wish to change their certified product(s).
- 8.1.2 When notifying the certification body, the certificate holder confirms what they wish to change.
- 8.1.3 The certification body confirms when the certificate holder should apply for amendment.

NOTE: Any modification to the product is likely to result in the need for an amendment application, other than cutting (e.g., if film is cut into smaller sizes).

8.1.4 Any producer who intends to apply for amendment can request an application form from the scheme owner or download the relevant form(s) from the scheme owner's website. The relevant application form is required to be completed with the attached data sheet.

9 CONFORMITY ASSESSMENT

9.1 Conformity assessment for initial certification

- 9.1.1 If the final product has been tested by one of its approved laboratories, the certification body carries out the conformity assessment with the aid of the test report.
- 9.1.2 The certification body carries out the conformity assessment against the applicable standard, according to these scheme rules in its latest version.
- 9.1.3 If the conformity assessment finishes with a positive result, the certification body confirms to the scheme owner that the product conforms with the "REAL Industrially Compostable Products" requirements.
- 9.1.4 The certification body generates and issues the PDF certificate with the product registration number to the scheme owner. The scheme owner issues the PDF certificate and certification mark containing the product registration number to the applicant.
- 9.1.5 The product is registered with the product details uploaded to and published on the CMCS and certification body's database and displayed on the CMCS website <u>www.compostablematerials.org.uk</u>.

- 9.1.6 The producer is granted the right to use the certification mark (the REAL 'Industrially Compostable' certification mark) by the scheme owner in line with the respective signed trademark licence agreement between the certificate holder and REAL.
- 9.1.7 The producer is granted the right to use the certification mark (the REAL 'Industrially Compostable' certification mark) by the scheme owner in line with the respective signed trademark licence agreement between the certificate holder and REAL.
- 9.1.8 The producer may use the certification mark according to the requirements in section 11 of these Scheme Rules.

9.2 Conformity assessment for verification

9.2.1 The certification body carries out the conformity assessment against the applicable standard, according to these scheme rules.

NOTE: The verification conformity assessment includes the checking of the product (and any external packaging) with the respective certification mark and corresponding registration number.

- 9.2.2 If the results fulfil the necessary requirements, the certificate will remain valid, and the licence agreement will not be terminated by the scheme owner for use of the certification mark. The certification body will inform the certificate holder via a letter of confirmation.
- 9.2.3 If there are deviations from the spectral analyses or the maximum applicable wall thickness/grammage submitted with the application, the certification body informs the scheme owner in written form on the requirements which need to be met for the certificate to remain valid, and the scheme owner sends this deviation report to the certificate holder requesting a written position statement.
- 9.2.4 If the certification body cannot make a positive assessment on the basis of the position statement, the remaining 4 samples are required to be tested at the same laboratory. The scheme owner informs the certificate holder that they must request the laboratory sends the test reports directly to the certification body.

NOTE: In the event that the certification body makes a positive assessment, no further testing will be required, and the scheme owner will inform the certificate holder. The status of the certificate will remain unchanged.

- 9.2.5 The certification body assesses the test reports and if the assessment meets the necessary requirements following the re-tests, the certification body will send the scheme owner a letter of confirmation for the scheme owner to send the certificate holder. No further testing will be required, and the status of the certificate will remain unchanged.
- 9.2.6 If less than 4 of the 5 tested samples meet the scheme requirements, 10 new samples are submitted for re-testing to the same laboratory. The scheme owner informs the certificate holder that they must request the laboratory sends the test reports directly to the certification body.
- 9.2.7 If the assessment does not meet the necessary requirements following the re-test (less than 9 of the 10 samples submitted meet the scheme requirements), the certification body will suspend the certificate and confirm this in writing to the certificate holder.

- 9.2.8 The certificate holder shall seek to ensure compliance with the scheme requirements within 3 months and is unable to sell or label products as certified during that time.
- 9.2.9 A further 5 samples shall be submitted for testing within 3 months and if 4 or 5 samples meet the scheme requirements, the certificate suspension will be lifted. However, if less than 4 samples meet the scheme requirements, the certificate will be withdrawn, and the certificate holder will be required to reapply.

NOTE: The certification body will also suspend the certificate if any similar non-conformities are identified during the verification process and the certificate holder shall seek to ensure compliance within 3 months as above. The certificate will be withdrawn if the same non-conformities are identified after re-testing, and the certificate holder will be required to reapply.

9.3 Conformity assessment for renewal

- 9.3.1 The certification body carries out the conformity assessment with the application for renewal documents, including verification test reports.
- 9.3.2 If there were no deviations found during the verification tests, the certificate is renewed.
- 9.3.3 If any deviations were found during the verification tests, it will be considered by the certification body and the certificate may not be renewed.

10 CERTIFICATES

10.1 Validity of certificates

10.1.1 The certificate for products is valid for 5 years. The period of validity is shown on the certificate. On expiry of the certificate, the right to use the mark also expires.

10.2 Product registration numbers

10.2.1 Composition of the registration number: UKICxxxx

11 CERTIFICATION MARK

11.1 'Industrially Compostable' certification mark



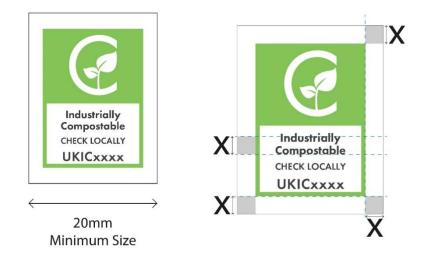
REAL's trademark registered 'Industrially Compostable' certification mark

11.2 Use of the certification mark

- 11.2.1 The certification mark shall only be used in clear association with the respective product for which the producer holds a valid certificate of conformity with the Scheme Rules.
- 11.2.2 The mark shall only be used with the assigned product registration number, as issued by the scheme owner with the certificate.
- 11.2.3 The mark shall not be used without indicating it is a certification mark.
- 11.2.4 If the mark is printed on the certified product, the following requirements shall be adhered to:
- 11.2.4.1 The mark shall only be printed using the same inks assessed for certification.

NOTE: The mark can only be printed on printed products which have been assessed as printed products.

- 11.2.4.2 The appearance of the mark shall not be altered or modified, or the mark amended in any way.
- 11.2.4.3 The mark shall be displayed in its entirety and in the upright position.
- 11.2.4.4 The minimum reproduction size is that the mark fits within a 20-millimetre-wide exclusion zone. The exclusion zone is based on the unit 'x' which is determined by the depth from the top of the first line of text ('Industrially') to the bottom of the second line of text ('Compostable'). The exclusion zone surrounding the mark shall be kept clear of text and other graphic elements and its background should be uniform.



- 11.2.4.5 The mark shall not be tinted, shadowed, or subject to any other effects, and the positioning of the mark's elements shall remain as laid out in the version supplied by the scheme owner.
- 11.2.4.6 To ensure a consistent image, the mark shall be displayed in the following colour combination with these colour codes:
 - Green R143 G192 B69 / #8fc045
 - Grey R26 G26 B26 / #1a1a1a

• White – RFF GFF BFF / #FFFFFF

NOTE: The white space within the mark must remain white and not transparent.

- 11.2.5 If it is impossible to print the mark on the certified product, it may be printed on the external packaging, providing the following requirements are adhered to:
- 11.2.5.1 The version of the mark issued by the scheme owner, clearly identifying the certified product type, and including the assigned product registration number, shall be used.
- 11.2.5.2 The appearance of the mark shall not be altered or modified, or the mark amended in any way.
- 11.2.5.3 The mark shall be displayed in its entirety and in the upright position.
- 11.2.5.4 The mark shall not be tinted, shadowed, or subject to any other effects, and the positioning of the mark's elements shall remain as laid out in the version supplied by the scheme owner.
- 11.2.5.5 To ensure a consistent image, the mark shall be displayed in the following colour combination (the colour codes of the mark are):
 - Green R143 G192 B69 / #8fc045
 - Grey R26 G26 B26 / #1a1a1a
 - White RFF GFF BFF / #FFFFFF

NOTE: The white space within the mark must remain white and not transparent.

11.2.5.6 A sample of the packaging shall be shared with the scheme owner prior to the use of the mark and the scheme owner shall share a photograph of the sample packaging with the chosen certification body for their records.

12 APPEAL PROCESS

12.1 Appeal procedures

- 12.1.1 Any producer that appeals against a decision taken by the certification body shall follow the certification body's relevant appeal procedures.
- 12.1.2 The producer makes known the reasons for the appeal and provides supporting evidence.
- 12.1.3 The certification body follows its own appeal procedures and keeps the scheme owner informed of all appeals received, their subjects and outcomes.