PolyCert Food

Rules & Principles

28/09/2026

Version 1

Created by PolyCert Europe

This document is subject to future review and potential update(s). The first review will take place after one year of implementation.

Revision history:

- V1 – 19/08/2026 – PolyCert Europe – First issue
- V1.1 – 28/09/2026 – PolyCert Europe – Increased SME audit duration from ¾ day to 1 day.

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0. Introduction

PolyCert Europe is a Consortium establishing an EU-level Third Party Quality Certification for converters of polymer-based materials (e.g. plastics, textiles) to stimulate the circular economy. The scheme helps companies verify compliance with quality standards and ensures their products live up to the best performance regardless of whether they use virgin polymers or recycled polymers. The objective is to provide quality certification and verification of recycled content in converted products.

PolyCert Europe has developed and is Owner of a certification scheme, called (PolyCert certification of recycled materials and articles to come in contact with food and their waste input obtained through separate collection or closed product loops) (hereinafter referred to as PolyCert Food). It is aimed at assessing the compliance of a company's processes with food contact material requirements, enacted by Regulation (EU) 2022/1616, ensuring that recycled plastics materials intended to come into contact with food are handled and processed in accordance with applicable hygiene, safety, and regulatory standards.

PolyCert Food is managed and run by a Management Board set-up by the Scheme Owner and overseen by the PolyCert Europe Supervisory Board, including scheme-owners and external stakeholders including supply chain representatives, National and European Authorities.

This document summarises the principles of the PolyCert Food Certification Scheme. The PolyCert Food Requirements document consists of the set of requirements to comply with in order to be PolyCert Food certified. The scheme will be reviewed after 1 year of implementation, and possibly amended where needed. PolyCert Europe ensures further that by implementing the programme, companies also comply with relevant EU regulation, namely, Regulation (EU) 2022/1616.

Updated versions of the documents will be available on the website of PolyCert Europe (https://www.polycerteurope.eu/).

1. Scope

This document sets out the rules and principles governing the PolyCert Food certification scheme. It applies to the certification of the traceability, quality assurance and recycling/handling processes of companies that produce, or contribute to producing, recycled plastic materials and articles intended to come into contact with food.
The scheme verifies the conformity of a company's processes with the PolyCert Food Requirements, which operationalise the relevant provisions of Regulation (EU) 2022/1616, in particular the requirements on the quality of the plastic input to recycling set out in Article 6, together with the traceability principles of EN 15343.
Certification under this scheme is available to operators in the food-contact plastics recycling value chain, namely: recyclers; converters; food business operators and collectors of plastic waste.
Certification is site-specific: a separate certificate is issued for each facility, and no multi-site certification is granted. The scheme applies to operators established in the European Union. Where the plastic waste input originates outside the EU, certification requires the operator to

demonstrate that conditions equivalent to those required within the EU, as regards origin of the waste, separate collection and quality assurance, have been maintained throughout the steps prior to import.
PolyCert Food is a voluntary, third-party certification. It attests to the conformity of the certified company's processes with the PolyCert Food Requirements; it does not:

- replace the operator's own legal obligations under Regulation (EU) 2022/1616 or the official controls carried out by competent authorities;
- constitute or substitute for the authorisation of a recycling technology, the EFSA safety evaluation, or the entries in the EU register referred to in Article 24 of that Regulation;
- or certify the safety or compliance of any individual finished food-contact article, or of the food itself.

The PolyCert Food Requirements set out the detailed, auditable criteria; this document governs how conformity with those requirements is assessed, decided, maintained and communicated.

2. Scheme development and operation

The PolyCert Food certification scheme is owned by PolyCert Europe.

The PolyCert Food certification is based on audits, performed by independent and competent certification bodies. The PolyCert Food certification is based on a 3-year audit cycle of which the first audit in each cycle encompasses an on-site audit and subsequent audits in the cycle are documentary unless non-conformities require otherwise. The application for a recertification audit should be initiated and concluded by the certified company within the validity period of its certificate.

Requirements are reviewed in a process involving the Technical Committee and the Management Board. In case changes to requirements are deemed necessary, the PolyCert Technical Committee is responsible for updating the scheme according to legal requirements and industry best practices, and submitting the changes for approval by the Management Board (see Annex I). During the first audit cycle, a review will be carried out one year after the start of operation of the scheme.

When changes to the PolyCert Food Requirements or to these Rules and Principles are approved, PolyCert Europe publishes the revised documents on its website and notifies the approved certification bodies, which inform their certified companies. Each change specifies an effective date and, where it affects the requirements a certified company must meet, a transition period proportionate to the implementation effort (as a default, 6 months from publication). Certified companies demonstrate conformity with the changed requirements by the end of the transition period, normally at their next scheduled audit.

3. PolyCert Food certification requirements

To be PolyCert Food certified, companies shall demonstrate their compliance with the PolyCert Food Requirements. These requirements cover, but are not limited to, management practices including critical control point management, good manufacturing practices, quality assurance and traceability. These will be verified at the level of waste qualities and products by an independent certification body.

All PolyCert Food requirements are translated into auditable questions (PolyCert Food Checklist & Requirements) which include detailed information for both the auditor and the externally audited company to be certified on how to interpret it.
The English version is the master text. Authorised translations are available in several other languages on the PolyCert Food certification website for downloading. In case of any doubt, reference shall always be made to the English version.

4. Certification bodies

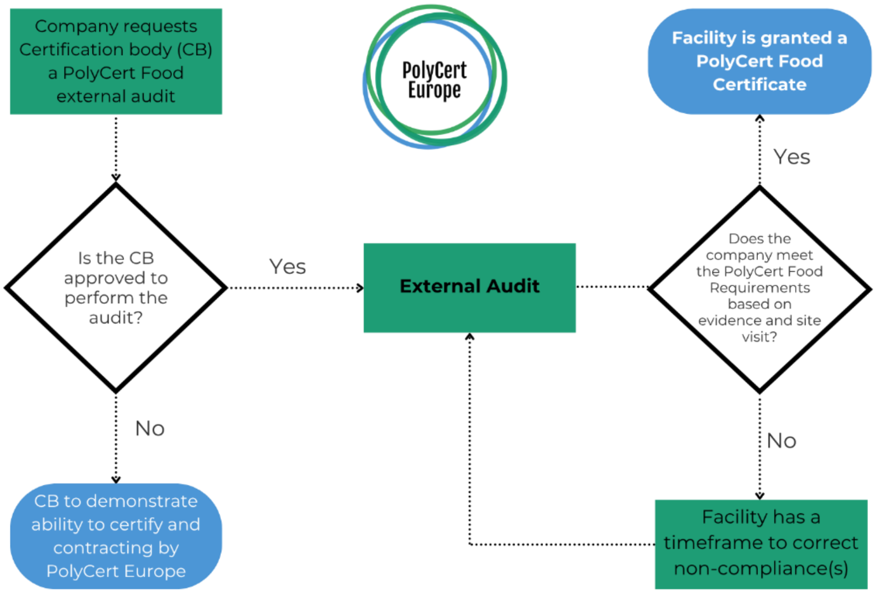
The certificate in accordance with the PolyCert Food requirements shall be issued by an independent Certification Body with technical competence in the plastic sector, able to demonstrate it through an accreditation issued by an accreditation body that is a signatory to the Multilateral Recognition Arrangement (MRA) operated by Global Accreditation Cooperation Incorporated (Global ACI) for product certification activities in accordance ISO/IEC 17065 for audit and certification in the plastics sectors (raw material producer/supplier, logistics/transport/cleaning, converters, recyclers…). Appropriate certification bodies will be approved through the scheme governance structure.

In addition to the personnel requirements of ISO/IEC 17065, the PolyCert Food requirements for auditors are as following:
General criteria for an **PolyCert Food certification Auditor**:

- Knowledge of conformity assessment techniques: Having passed a training course of auditors of environmental/quality management systems (EN ISO 14001 and/or EN ISO 9001).
- Knowledge of European/national/local regulation related to food contact recycled plastic materials
- Languages: the auditor must speak English + one of the national languages of the country where the audit is carried out.
- Experience in plastic value chain evaluation*[1]:
- Participating in at least two audits or inspections as observer in PolyCert Food certification audits.
- Carrying out at least 1 audit in PolyCert Food certification practices. This audit will be supervised by a person with the corresponding qualification, who will complete a supervision form in which will reflect if, in his/her discretion, the candidate has the necessary technical competence to carry out the visit alone.
- Attending a specific training course on the PolyCert Food certification carried out by an PolyCert Food licensee[2] entity and by the PolyCert Food scheme responsible at the certification body.

[1] This requirement shall apply to the lead auditor or the auditor who intends to train future auditors.
[2] A list of all PolyCert Food licensees across Europe can be found in the PolyCert Food website.

5. Certification Process



A. Application

When a company to be certified expresses its intention to obtain certification according to the PolyCert Food Certification Scheme, it must select a certification body from the approved list of certification bodies[3] and complete the application that will be provided by the certification body selected. The request must be made for each facility for which the company to be audited wants to be PolyCert Food certified. The contract is made between the company to be certified and the selected certification body, including (but not limited to) the audit plan, dates of the site visit and the audit team designated for the external audit.

The certification bodies shall be contracted by the company to be certified. The contract shall include clauses to be respected by the certification holder, clauses to be respected by the certification body, clauses related to complaints and sanctions at infringement. The certification body will be impartial and provide its certification service to facilities unless there are fundamental and demonstrable reasons for refusal (e.g. illegal activities of the applicant).

[3] A list of all certification bodies for the PolyCert Food certification Scheme can be found in the PolyCert Food website.

B. Application review

The certification body will review the application and supplementary information provided by the company to ensure that the information is sufficient to develop an audit program, to resolve any differences in understanding between the applicant and the certification body.

The certification body will propose the audit plan, dates of the site visit and the audit team.

C. The audit program

A full PolyCert Food certification cycle has a duration of 3 years. In case of the initial certification this cycle is composed of the initial audit, two surveillance audits in the first and second year following the initial audit. Before the end of the third year, a recertification audit marks a new certification cycle.

The initial audit and the recertification audits are on-site audits.

D. Audit time

In case of an initial the audit duration depends on the size of the company, in terms of full times equivalent, as follows:

Type of company	STAGE 1 (see section 6.A)	STAGE 2 (see section 6.B)
Companies with less than or equal to 50 employees (FTE)	1 day	
Companies with more than 50 and less than or equal to 250 employees (FTE)	½ day	1 day per production site
Companies with more than 250 employees (FTE)	1 day	1 day per production site
Independent assessor review		2 hours per production site

In case of a surveillance audit, the audit time shall be half a day per production site and is independent of the size of the company.

In case of recertification audit (renewal audit after initial certification), the audit time is as follows.

Type of company	Recertification audit
Companies with less than or equal to 50 employees (FTE)	½ day
Companies with more than 50 and less than or equal to 250 employees (FTE)	1 day per production site
Companies with more than 250 employees (FTE)	1 day per production site

In the case of an on-site audit, travel time is not included in the numbers above.

In case the certification body auditing for recertification is not the same who had done the prior certification audit, the recertification audit timings should be the same as for an initial audit.

6. Initial certification

The selected certification body shall review the site's conformity with the PolyCert Food Requirements by performing an audit. The initial audit is composed of two stages:

A. Stage 1

The objectives of stage 1 are the following:

- To review the status of the applicant and their understanding of the PolyCert Food goals and requirements and, their understanding of applicable legislation, if relevant.
- To obtain the necessary information related to
  - The applicant site and other relevant information related to the scope of the audit;
  - The processes and equipment used for handling and/or processing plastic materials and/or articles intended to come in contact with food.
  - Relevant background documentation such as collection scheme selection criteria, report of equivalence to EU 10/2011 and documentation of separate collection for third countries, EFSA opinion, EC authorization, Compliance Monitoring Summary Sheet, novel technology dossier…

- To provide a focus for the planning of stage 2 based on sufficient understanding of the applicant's system of recycling plastic materials and/or articles intended to come in contact with food.

B. Stage 2

The objectives of stage 2 are to evaluate the implementation of the PolyCert Food requirements and if needed the provisions of applicable legislation related to the recycling plastic materials and/or articles intended to come in contact with food.
The certification body shall check, using the PolyCert Food audit checklist, the implementation, including the effectiveness of the PolyCert Food requirements and if relevant, the requirements of the applicable legislation related to the recycling plastic materials and/or articles intended to come in contact with food.

This stage 2 shall take place at the site of the applicant.

Once the audit visit is finished, the certification body shall prepare an audit report stating the non-conformities, observations, positive findings, and opportunities for improvement identified during the audit, to be signed by the auditor. The PolyCert Food audit checklist shall be an annex to the audit report. The content of the audit report is confidential. However, relevant information such as answers to the questionnaire checklist, expert report on compliance with Commission Regulation (EU) No 10/2011, documentation of separate collection will be shared with PolyCert Food Management Board .

In the case of non-conformity, the company to be certified will have a period of 30 days to provide evidence of corrective actions to the auditor of the certification body which will proceed to its study and evaluation. Failure to demonstrate evidence of corrective actions will result in the failure of the audit. The company to be certified will have to re-apply for certification as described in Section 6.A.

C. Performing an audit

An audit starts with an opening meeting and ends with a closing meeting, both following the ISO/IEC 17065 standard. During the audit, the auditor shall follow the PolyCert Food checklist and shall identify and record the audit findings. They shall also verify if findings from the previous audit have been implemented according to the agreed action plan. After the audit and during the closing meeting, the auditor shall prepare the audit conclusions and explain these conclusions and non-conformities in sufficient detail and verify that the conclusions and the non-conformities are understood by the applicant. The auditor can issue two types of non-conformities:

- A minor non-conformity does not compromise the PolyCert Food requirements. Each minor non-conformity shall require an accepted (by the auditor) action plan. The corrective action to such a shortcoming shall be verified during the following surveillance audit. If the corrective action and its implementations are considered insufficient within the set period, the minor non-conformity becomes a major non-conformity. The certificate holder will have a period of 30 days to provide to the auditor, a corrective action plan to mitigate non-conformities. The auditor will evaluate the corrective action plan and accept or refuse it. No certificate can be issued before the acceptance of the corrective action plan. The certification body shall review the implementation progress of the corrective action plans in the surveillance audit.

- A major non-conformity is a non-conformity compromising the PolyCert Food requirements. The certificate holder will have a period of 30 days to provide to the auditor, a corrective action plan to mitigate non-conformities. The certificate holder shall perform the corrective actions within the set period with a maximum of 3 months and provide proof to the auditor of the implementation of the actions. If the corrective action and its implementation are considered insufficient, the corresponding certificate shall not be granted resp. be suspended or withdrawn.

A non-conformity shall be recorded against a specific PolyCert Food requirement and shall contain a clear statement of the non-conformity. The complete PolyCert Food checklist will be annexed to this report.

The audit report is deemed confidential between the company, the certification body and the PolyCert Food governing bodies.

7. Maintaining certification

The certification body shall maintain certification based on demonstration that the applicant continues to satisfy the PolyCert Food requirements.

A. Surveillance audits

The surveillance audits shall be carried out in order to verify that the conditions that gave rise to the granting of the certificate are still in place and to ensure continuous improvement, through the correct implementation of the action plan proposed by the organisation.

In surveillance audits, the auditor will check the maintenance of implementation of any additional corrective action plan through appropriate evidence. Failure to implement the corrective action plan will result in revoking the certificate.
The PolyCert Food requirements that should be reviewed at each surveillance audit are identified in the PolyCert Food requirements list.

If the company to be certified was unable to implement the action plan for resolving minor non-conformities, then this will result in a major non-conformity.

If the company to be certified was unable to take appropriate measures to deal with major non-conformities within a period of 30 days, the certification body shall consider one or more of the following measures, depending on the urgency and/or importance of the non-conformity:

- Observation: if a misunderstanding or negligence is at stake, the company to be certified shall at first be informed in writing with the request to rectify. A written response should be given to enable evaluation of actions taken.
- Immediate withdrawal of the certificate or limitation of the application field: sent by registered mail

Note: The company to be certified shall re-apply and go through the entire certification process as described into section 5.A.

Decision for suspension or withdrawal of certificate may be appealed subject to the Appeal procedure described in Annex III.

B. Audit for the renewal of a certificate

The audited certified company will apply for a recertification audit every three years to a certification body, in the PolyCert Food list of certification bodies to check whether the conditions that gave rise to the granting of the PolyCert Food certificate are maintained.

This audit is an on-site audit with the same objectives as stage 2 of the initial audit.

C. Suspension, restoration, withdrawal and reduction of scope

The certification body may suspend, withdraw or reduce the scope of a certificate.

- *Suspension* - applied where, for example, a major non-conformity is not corrected within the agreed period, a surveillance or recertification audit cannot be carried out in time, or at the certified company's request. While suspended, the certificate is temporarily invalid and the company shall not use the logo or refer to its certification. Suspension shall not exceed 6 months.
- *Restoration* - the certificate is restored where the company provides, within the suspension period, evidence (verified as necessary by the certification body) that the issues have been resolved. If they are not resolved within that period, the certificate is withdrawn.
- *Withdrawal* - applied where non-conformities or suspension conditions are not resolved within the set period, or in cases of serious or repeated non-conformity or misuse. On withdrawal the company ceases all use of the logo and references to certification and is removed from the public register (see section 9.C).
- *Reduction of scope* - where part of the certified scope no longer meets the requirements, the certificate is reduced to the parts that remain in conformity.

Decisions on suspension, withdrawal or reduction of scope may be appealed under Annex III.

8. Evaluation and decision to award the PolyCert Food certificate

The decision to award the PolyCert Food certificate is taken by the certification body. The decision shall be made by a person or persons who did not carry out the audit, on the basis of the objective observations and reports of the qualified auditor(s), weighted against the PolyCert Food criteria. If the audit report concludes that the company fulfils all requirements, i.e. that there are at most minor non-conformities, each with an accepted action plan, the certificate is awarded.
In the case of a positive decision, the certification body issues and signs the certificate and notifies the PolyCert Food Management Board, which records the certification in the public register.
The scheme owner does not take individual certification decisions; its role is limited to approving and overseeing certification bodies and being informed of certification outcomes.

In the event of a negative decision, the certification body will inform the applicant and will explain the reasons for this refusal. The applicant has the right to appeal against the decision towards the relevant entity PolyCert Europe Management Board (for the appeal procedure see Annex III). In case the refusal to issue the certificate is maintained after the appeal or the applicant does not use his right to appeal, the certification body will notify the appropriate PolyCert Food governing body, that will inform the other certification bodies acting on behalf of PolyCert Food.

9. Communication

A. Use of PolyCert Food logo

In the event of a positive decision, the certification body will sign the certificate that is issued to the company. In the certificate, reference will be made to the code of adherence to the scheme and to the verification code assigned by the holder of the PolyCert Food rights[4] and the expiration date of the certificate (3 years). Once the certificate has been granted, the certified company will refer to the PolyCert Food certificate by using the following logo:

The PolyCert Food logo and any reference to certification may be used only by a certified company, only for the certified site(s) and scope, and only during the certificate's validity. The logo shall not be applied to individual products or used in any way that could mislead as to the scope or status of the certification. The certification body shall monitor its certified companies' use of the logo; in the event of incorrect, misleading or unauthorised use, including continued use after

[4] A list of all PolyCert Food licensees across Europe can be found in the PolyCert Food website.

suspension, withdrawal or expiry, it shall require correction and may suspend or withdraw the certificate. Serious or repeated misuse shall be reported to the PolyCert Food Management Board, which may inform the other certification bodies.

B. Publication on the Polycert Food Public Register

Once the certified company is awarded the PolyCert Food certificate, the name and location of the PolyCert Food certified company for which the certification is awarded becomes then available on the PolyCert Food public register.

The following information is shown on the PolyCert Food Public Register:

Type of Data	Register Manager	Publicly Available	Publicly Searchable
Parent Company	✓	✓	✓
Company/ Business	✓	✓	✓
Country	✓	✓	✓
Type of company	✓	✓	✓
Sector / Activity	✓	✓	✓
Company Contact Details	✓	Generic details or website	×
Last audit date	✓	×	×
Certificate	✓	✓	×
Date of expiry of certificate	✓	✓	✓
Certification Body/ Auditor	✓	✓	✓

Any private data such as individual contact details provided by companies to the Register shall only be kept for as long as that contact is valid. If the contact details are changed then the previous details shall be deleted to meet GDPR requirements.

Data, including that related to whether a company to be certified passes or fails an audit, shall be kept for a minimum of 5 years. This will enable the Register Manager to determine whether a company to be certified is regularly failing and/or re-applying to join the Register. The Register Manager should keep records of companies that have failed an audit, but this shall not be made public.

C. Removal from registry

When a site/company fails a surveillance audit and does not provide evidence of implementation of corrective action in due time, it will be removed from the public registry within two months of the notification of the failed audit. The company to be certified can re-apply for the certification as described in section 5.A or follow an appeal procedure as laid down in Annex III.

10.Definitions

List of concepts	Definition
Audit	An official, systematic, independent and documented process for obtaining objective evidence and evaluating it objectively to determine the extent to which the audit criteria are fulfilled (source : ISO 9000:2015)
Compliance obligations	Legal requirements that an organization has to comply with and other requirements that an organization has to or chooses to comply with (Source: EN ISO 14001:2015)
Conformity	Fulfilment of a requirement (Source: ISO 9000:2015)
Continual improvement	Recurring activity to enhance performance (Source: ISO 9000:2015)
Management system	Set of interrelated or interacting elements of an organization to establish policies and objectives and processes to achieve those objectives (Source: ISO 9000:2015)
Non-conformity	Non-fulfilment of PolyCert Food requirements or compulsory specific requirements. A minor non-conformity does not compromise the fulfilment of the PolyCert Food scheme requirements. A major non-conformity compromises the fulfilment of the PolyCert Food scheme requirements.
Performance	Measurable result (Source: ISO 9000:2015)
Objective	Result to be achieved (source: ISO 9000:2015)

Annex I: Governance of the PolyCert Food certification scheme

The Governance structure of the PolyCert Food certification scheme is composed of 4 bodies.

Stakeholder Platform

Composition: a multi-stakeholder group of representatives from industry, policymakers and certification bodies. Its balanced composition ensures that no party can block the decision making of the Board, while ensuring its independence.

- **Remits:** The Stakeholder Platform gives opinions on critical aspects of the Scheme. This would consist on comments on criteria for new requirements, training, certification bodies and inclusion in the Scheme's public register.
- The Stakeholder Platform reviews feedback on the scheme implementation with a view of a consistent implementation and interpretation of the requirements.

PolyCert Food Management Board

Composition: 3 to 5 representatives of the PolyCert Europe Founding members appointed by the PolyCert Europe Supervisory Board.

Remits:

It makes proposal for new requirements and organization of the scheme, is responsible for day-to-day running of the scheme and administer funds allocated by PolyCert Europe

Decision making: the Management Board will strive to reach consensus but in case of disagreement may decide by simple majority of its present or represented members provided a quorum of two-third of its members present or represented is reached.

PolyCert Food Technical Committee

Composition: technical experts from the certification bodies conducting audits and ensuring regulatory compliance.

Remits:

- Develop the PolyCert Food Requirements;
- Ensures a technical follow-up of the scheme to improve quality and consistency control develop guidance/interpretation documents and when necessary, propose modifications to requirement (see Annex I)
- Will provide technical advice during the review of the scheme at the end of each "audit cycle".
- The Technical Committee report to the Management Board.

Decision making: Decisions are made by consensus. In the occurrence that the Technical Committee cannot reach consensus, they will escalate the issue to the Management Board.

Quality Board

Composition: A pool of experts from industry (either trade association staff or company staff) /certification bodies that may act as observer in a company audit.

Mission:

- The observer task is to observe audits, understand issues and inform (knowledge sharing, learning process, quality) as appropriate the Technical Committee and/or Management Board.
- Review appeals regarding certificate allocation and inform the Management Board accordingly

Auditors Independence: Observers may only make observations to be communicated to the Technical committee, Management Board. They do not influence the result of an audit.

Compliance with competition law: Specific rules ensuring respect of competition law will be defined for “company” observers (i.e. they may in principle not observe competitors).

Annex II: PolyCert Food external reporting, transfer of knowledge, consistency and quality control,

The scheme should meet different interdependent objectives:
1) Transparency on the progress of the scheme and reporting on industry progress
2) Ensuring consistency in the interpretation and implementation of the scheme
3) Knowledge sharing and continuous learning, spread of best practices
4) Quality control

Whilst certification bodies are the main responsible to ensure the quality and consistency of the audit, an adequate support mechanism should be organized by which knowledge from industry experts/trade association can be transferred to certified bodies and vice versa.

Information generation during the certification process

The certification process is described in section 5 of the document rules and principles. The auditor evaluates the compliance with the PolyCert Food overall objectives based on their knowledge of the industrial process to be certified, the review of documentary evidence and in situ inspections. They are assisted by a predefined auditor check list to guide the audit and the answers of this check list will be communicated in an IT system.

The role of PolyCert Food technical committee

The PolyCert Food technical committee is the forum through which transfer of knowledge may be ensured.

On a regular basis (every 6 months), the technical committee shall review the following:
1) Certification bodies report on specific issues regarding the implementation of the scheme/understanding
2) Trade association updates on knowledge gained through survey/other feedback
3) Critical variations observed in the implementation of the scheme identified by the Management Board based on certified companies feedback and certification bodies reports

Three types of follow-up actions might occur
1) Update of guidance/issue of new guidance/interpretation document to auditors and companies to be certified
2) Use of an observer during an audit to improve understanding on particular issues
3) Recommendation for modification of the requirements, if necessary

Training

Training is an integral part of the quality and transfer of knowledge system. Training material is regularly updated.

Certification bodies must have attended a specific training course on the PolyCert Food certification carried out by an PolyCert Food licensee entity. The auditors of a specific certification body must attend either a specific training course carried out by an PolyCert Food licensee or by the PolyCert Food scheme responsible at the certification body. On a regular basis (yearly in the beginning, and then every two years or after a major review of the scheme) those certification bodies and auditors are retrained. It is the task of the certification bodies to train any auditors unable to attend the training carried out by the PolyCert Food licensees.

Control of auditors

It is the responsibility of certification bodies to control their auditors.

Annex III: Appeal procedure

1) When a company undergoing certification disagrees with the results of an audit granting, suspending or withdrawing a certification, it may appeal to the PolyCert Food Management Board.

   The information with due motivation of the appeal and evidence is sent to PolyCert Europe secretariat.

2) The secretariat informs the Management Board of the appeal removing confidential elements or those that may be sensitive from a competition law point of view.
3) The management board may
   a. Based on the provided information reject the appeal, or
   b. Delegate the analysis of the matter to the Quality Board
4) The Quality Board may
   a. appoint an observer from the quality board to revise the written documentation regarding the appeal (including confidential information). The observer will then make a report to the Management Board, or
   b. appoint an observer to repeat the audit in the presence of the certification body. The certification body and company may jointly appoint an independent expert to also attend the audit.
5) the Quality Board will provide a written recommendation to the Management Board whether or not the certificate should be awarded or inform the Management Board if there have been irregularities in the procedure for allocating the certificate
6) The Management Board based on the recommendation of the Quality Board may
   a. Decide on the granting, suspension, or withdrawal of certification;
   b. Request a review by the Technical Committee of rules and principles, requirements or guidance if necessary;
   c. Take necessary measures if there is a breach in the contract with the certification body.
   d.
7) The appellant shall pay an appeal fee of 500.00 EUR at the time of submitting the appeal. The fee is refunded in full if the appeal is upheld; if the appeal is not upheld, the fee is retained and applied towards the costs borne by the appellant under this section. Beyond this fee, the appellant bears its own costs of preparing and submitting the appeal. Where the Quality Board determines that a repeat audit or the involvement of an independent expert is necessary:
   a. if the appeal is upheld and the original decision is changed in the appellant's favour, the costs of the repeat audit and of the Quality Board's involvement are borne by the certification body;
   b. if the appeal is not upheld, those costs are borne by the appellant;
   c. where the certification body and the company jointly appoint an independent expert (step 4.b), the cost of that expert is shared equally between them unless they agree otherwise.