



# Model Covenant K-0212902

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Replaces -

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## Products for primary assets of Energy Installations – Validation of circularity data from Raw Material Passport (RMP)

### STATEMENT BY KIWA

With this Covenant, issued in accordance with the Kiwa Regulations for Certification, Kiwa declares that legitimate confidence exists that that circularity data of the products manufactured by

**XXX**

and used as a primary asset of the energy network operators united in Netbeheer Nederland as specified in this Kiwa Covenant, may be relied upon to comply with the circularity data of the Raw Material Passports of the energy network operators united in Netbeheer Nederland.

Ron Scheepers  
Kiwa

*Publication of this certificate is allowed.*

*Advice: consult [www.kiwa.nl](http://www.kiwa.nl) in order to ensure that this certificate is still valid.*

COVENANT

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Certification process  
consists of initial and  
regular assessment of:

- Quality system
- Circularity data RMP

## **Preface**

This Kiwa Covenant has been prepared by the Technical Committee “Validation of circularity data from raw material passport” of Kiwa Nederland B.V. and accepted by the Kiwa Committee of Covenant (KCC). The KCC also supervises the certification activities and where necessary requires the Kiwa Covenant to be revised.

This Kiwa Covenant will be used by Kiwa in conjunction with the Kiwa-Regulations for Certification and Kiwa manual 15013. This regulation details the method employed by Kiwa for conducting the necessary investigations prior to issuing the product certificate and the method of external control. The inspection frequency is determined by the above-mentioned Technical Committee and Kiwa Committee of Covenant.

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# 1 Scope of the Covenant

## 1.1 The assessment scope and definition of the product

The assessment scope of this Kiwa Covenant is the validation of the circularity aspects of the raw materials used in manufacturing of products - used as a primary asset of the energy network operators united in Netbeheer Nederland - in terms of recycled content and recyclability data as specified in raw material passports for the energy network operators in The Netherlands. The products are primary asset parts of energy distribution systems including e.g. cables, pipes, valves, fittings, hoses, manifolds and regulators.

The recycled content and recyclability are determined based on principles described in product related standards including:

1. ISO 22095: Chain of custody — General terminology and models; where separated storage/transportation of recycled material from virgin material is required for clear identification of recycled content
2. ISO 14021: Environmental labels and declarations - Self-declared environmental claims (Type II environmental labelling), paragraph 7.8.1 ; where defining the term recycled content (see also section 1.3) and paragraph 7.8.4; defining the formula for calculating the percentage of recycled content.
3. IEC 62542: Environmental standardization for electrical and electronic products and systems - Glossary of terms, chapter 6; where defining recycling as processing of waste materials for the original purpose or for other purposes, excluding energy recovery.
4. Waste Framework Directive: Directive 2008/98/EC for End-Of-Waste criteria (article 6) and Prevention of waste (article 9).

The source (waste origin for the recycled content) is expected to be traceable per certificates issued according to for example the principles of EN 15343 for plastic products, NVN-CLC/TS 50625 series for waste electric and electronic equipment, ISO/IWA 19 for metals (which is withdrawn and soon replaced by ISO/CD 59014 and other related norms for other materials).

## 1.2 Fitness for function

This Kiwa Covenant is issued under Kiwa Covenant Manual K15013. The functional requirements for products are to be certified according to the clause 4.2 of the Manual K15013. This Covenant is issued only for the validation of the circular data of the raw materials used in the manufacturing of the product and not applicable for determining the fitness of function of the materials/products for the intended application.

## 1.3 Common terms relating to the certificate

- **Certificate holder:** The party that is responsible for ensuring that the products meet and continue to meet the requirements on which the certification is based. Official registered name of the certificate holder should be mentioned in the documentation.
- **Network administrator:** Grid and network operators that are responsible for the construction and maintenance of public energy infrastructures (electricity and gas)
- **Recyclability:** A characteristic of a product or associated component that can be diverted from the waste stream through available processes and programmes and can be collected, processed and returned to use in the form of raw materials or products.
- **Recycled content:** Proportion, by mass, of recycled material in a product per material type. Only pre-consumer and post-consumer materials shall be considered as recycled content, consistent with the following usage of terms:
  - **Pre-consumer material:** Material diverted from the waste stream during a manufacturing process. Excluded is reutilization of materials such as rework, regrind or scrap generated in a process and capable of being reclaimed within the same process that generated it.
  - **Post-consumer material:** Material generated by households or by commercial, industrial and institutional facilities in their role as end-users of the product which can no longer be used for its intended purpose. This includes returns of material from the distribution chain.
- **Recycled material:** Material that has been reprocessed from recovered [reclaimed] material by means of a manufacturing process and made into a final product or into a component for incorporation into a product.
- **Recovered [reclaimed] material:** Material that would have otherwise been disposed of as waste or used for energy recovery, but has instead been collected and recovered

[reclaimed] as a material input, in lieu of new primary material, for a recycling or a manufacturing process.

## 2 Determination of the circularity aspects: basic principle and determination methods

### 2.1 Determination of recycled content

#### 2.1.1 Basic principle

The evaluation by Kiwa whether the determination of recycled content can be validated is based on the assessment of the applicable company processes, including entry control of raw materials, the manufacturing of the products, storage and transport to the customers, that need to be set up in such a way that the values declared in the Raw Material Passport(s) with regard to "content of recycled material" can be substantiated. The specifications in the Raw Material Passports as provided by the supplier are hereby directly assessed.

#### 2.1.2 Calculation of the recycled content

The recycled content is expressed as a percentage of the mass of the recycled raw material used to the total mass of the supplied raw material.

Per raw material the calculation of the recycled content is as follows:

$$X(\%) = A / T * 100$$

Where:

X is the recycled content, expressed as a percentage;

A is the mass of recycled material;

T is the total mass of the raw material.

#### 2.1.3 Documentation required for determining the recycled content

To determine the recycled content the following documentation is required:

1. Third party independent certificate(s) (for guidance see Annex IV) to be provided by the supplier of the raw materials and/or incoming goods of each part of the product, confirming that the provided raw materials and/or incoming goods consist of the amount of recycled content as specified by the supplier.
  - For copper and up to a recycled content of 50 % it is allowed that the supplier provides a "declaration on honour (Verklaring op eer)" declaring the applicable percentage of recycled copper content. Above a recycled content of 50%, the supplied copper material shall be provided with a third party independent certificate/declaration, see Annex IV.
2. Material recipes ( / data sheets) from the material batches used for the manufacturing of the product which include the recycled content recovered from waste according to the product related standards.
3. Historical data preceding an audit showing traceability according to EN 15343:
  - Received loads. Recycled materials shall be traceable to recycler having 3<sup>rd</sup> party certificates (see Annex IV), showing the material name and its recycled content;
    - If certificate holder is also the recycler, then the recycling process shall be certified separately from the production process of the product to provide information for traceability of recycled content.
  - Amount of raw material(s) entering the production process must be traceable to incoming loads per production stage;
  - Amount of raw material(s) used in manufacturing process, including scrap.

#### 2.1.4 Requirements for certification of recycled content

1. The material(s) from which the product is made shall be, for the percentage of recycled content, retrieved from a third party certified recycler (see Annex IV);
2. Mass balance calculations according to clause 2.1.2 shall be available per requested period within or over the year of review by which recycled content according recipe is evaluated;
3. Quality check procedures and registrations shall be available for incoming loads, production and final product;
4. Identification of incoming loads, production batches and final product shall be implemented in order to enable traceability.

### **2.1.5 Procedure for verification of recycled content claim**

An initial investigation and yearly surveillance inspections will be executed to verify the required documentation and requirements to be met.

The inspections will be preceded by:

1. a questionnaire, example given in Annex I;
2. calculation sheet(s), example given in Annex II.

The questionnaire and the calculation sheet shall be filled in and returned before the inspection. During the inspections, the claim(s) for recycled content will be verified by means of checking the documentation and the requirements, the registrations as well as the information provided per the questionnaire and the calculation sheet(s).

## **2.2 Determination of recyclability: basic principle and determination methods**

### **2.2.1 Basic principle**

Waste ceases to be waste when it has undergone a recovery operation (including recycling) and complies with specific criteria, in particular when:

- the substance or object is commonly used for specific purposes;
- there is an existing market or demand for the substance or object;
- the use is lawful (substance or object fulfils the technical requirements for the specific purposes and meets the existing legislation and standards applicable to products;
- the use will not lead to overall adverse environmental or human health impacts.

The certificate holder shall describe the methodology and provide the commercial routing available showing the recyclability according to related standards such as CEN/TR 13688:2008, IEC/TR 62635:2012 or NEN-EN 13430.

### **2.2.2 Calculation of the recyclability**

The recyclability is expressed as a percentage of the mass of the recyclable material used to the total mass of the product.

1. The product consists of one type of material

$$Y(\%) = P * 100$$

Where:

Y is the recyclability, expressed as follows;  
P = 1,0 if the material can be recycled to a material;  
P = 0,0 if the material is not recyclable.

2. The product consists of more than one type of material

- Per each type of material the recyclability is calculated according 2.2.2-1;
- The mass per type of material is determined;
- The total recyclability is calculated as follows:

$$Y(\%) = (M1*P1 + M2*P2 + M3*P3) / \text{total mass} * 100$$

Where:

Y = the recyclability of the whole product, expressed as a percentage;  
Px = the recyclability per type material as determined according 2.2.2-1;  
Mx = the mass ratio per material type per product.

### **2.2.3 Documentation required for determining the recyclability**

The certificate holder is able to describe the product and its components.

The certificate holder is able to show a recycling process exists showing:

1. The method of collection of discarded product after end of life (technical and/or economical);
2. The method of sorting the product for recycling;
3. The recycling process to dismantle the product and recycle its components into useable raw materials;
  - If the product consists of several components, the recyclability must be shown per each component. If a component becomes not recoverable, this will impact the level of recyclability.
4. Existing economical use of recovered material including the level of use:
  - Usage for similar product;
  - Usage for products that require a lower spec.



#### **2.2.4 Requirements for certification of recyclability**

1. The certificate holder can show that each step in a recycling process for the product is technically and economically feasible;
2. The certificate holder can show that such processes are available and operated on a commercial scale;
3. The certificate holder can show that the recycled materials are used for the manufacture of new products.

#### **2.2.5 Procedure for verification of recyclability claim**

An initial investigation and yearly surveillance inspections will be executed to verify the required documentation and requirements to be met.

The inspections will be preceded by:

1. A questionnaire for recyclability, see Annex III;
2. The questionnaire shall be filled in and returned before the inspection. During the inspections, the claim(s) for recyclability will be verified by means of checking the documentation and the requirements, the registrations as well as the information provided per the questionnaire.

### **3 Verification and confirmation of the circularity data**

#### **3.1 Verification and confirmation of Recycled Content**

1. The certificate holder shall present information for the recycled content claim according to the determination methods of chapter 2.1;
2. Kiwa shall verify the data and information presented and confirm the recycled content claim according to 2.1.5.

#### **3.2 Verification and confirmation of Recyclability**

1. The certificate holder shall present information for the recyclability claim according to the determination methods of chapter 2.2;
2. Kiwa shall verify the data and information presented and confirm the recyclability claim according to 2.2.5.

## 4 Marking

The Kiwa Covenant logo (see below) may be used in connection with the raw materials passport in documentation, websites, leaflets, etc.



RMP = Raw Material Passport

And/or:



GSP = Grondstofpaspoort

## 5 Quality management system requirements

### 5.1 General

The certificate holder's quality management system must comply to the by the network operators required standard quality management system (*not to be assessed within the scope of this Covenant*).

Requirements imposed on the specific production and data processes related to the declared circularity aspects in the raw material passports are included in this chapter.

### 5.2 Internal quality control/quality plan

The certificate holder must have an implemented and operational internal quality control scheme (IQC-scheme) in place for the control of the specific production and data processes related to the declared circularity aspects in the raw material passports.

This IQC-scheme shall be derived from the example format as shown in Annex V. The scheme must be detailed in such a way that it provides Kiwa sufficient confidence that the requirements of this Covenant are continuously fulfilled.

## 6 Initial inspection and continuous surveillance by Kiwa

### 6.1 Summary of investigations and inspections

This chapter contains a summary of the following investigations and inspections to be carried out in the event of certification:

1. Initial investigation;
2. Yearly surveillance inspections;
3. Control of the certificate holder's IQC-scheme.

### 6.2 Assessment Matrix for validation of circularity data from material passport

Table 1 Assessment Matrix

Description of requirements	Clause Covenant	Investigation within the scope of:	
		Initial investigation	Inspections <sup>2)</sup>
Verification and confirmation of recycled content	3.1	X	X <sup>1)</sup>
Verification and confirmation of recyclability	3.2	X	X
Marking	4	X	X
Quality management system requirements	5	X	X

1. In case the production or data processes changes significantly, the verification requirements as laid down in the IQC-scheme shall be determined again.
2. During the inspection visit, the inspector shall check the declared circularity aspects in the raw material passports for a selection of by the certificate holder verified production batches. The frequency of the inspection visits is recorded in clause 7.3 'Nature and frequency of external inspections'.

### 6.3 Inspection of the quality system

The quality system will be checked by Kiwa on the basis of the IQC scheme (see par. 5.2).

### 6.4 Changes in the Raw Material Passports

Major changes in the Raw Material Passports need to be reported by the supplier to Kiwa before the final Raw Material Passports are sent to the energy network operators.

Major changes are defined as follows:

- declaration of circularity data for material(s) and/or product types not yet assessed by Kiwa;

Minor changes are:

- all other changes with regard to update of circularity data of materials and product types already assessed by Kiwa.

In the case of major changes, it will be assessed by Kiwa whether a separate application for approval of the changes is required.

Minor changes will be assessed during the yearly inspection audit(s).

## **7 Agreement on the implementation of certification**

### **7.1 General**

In addition to the requirements included in this Covenant, the general rules for certification as included in the Kiwa Regulations for Certification also apply.

In particular, these are:

- The general rules for conducting the initial evaluation to be distinguished in:
  - the way certificate holders are to be informed about how an application is handled;
  - how the tests and verifications are conducted;
  - the decision to be taken as a result of the pre-certification tests;
- The general directions for conducting inspections and the aspects to be audited;
- The measurements to be taken by Kiwa in case of Non Conformities;
- Measurements taken by Kiwa in case of improper Use of Certificates, Certification Marks, Pictograms and Logos;
- Terms for termination of the certificate;
- The possibility to lodge an appeal against decisions of measurements taken by Kiwa.

### **7.2 Report initial investigation**

Kiwa records the results of the initial investigation in a report. This report shall comply with the following requirements:

- completeness: the report's verdicts about all requirements included in the Covenant;
- traceability: the findings on which the verdicts have been based shall be recorded in a traceable manner;
- basis for decision: the decision maker shall be able to base his decision on the findings included in the report.

### **7.3 Nature and frequency of external inspections**

Kiwa shall carry out inspections at the certificate holder's site to investigate whether the obligations are met. At the time of validation of this Covenant this frequency has been fixed at 1 inspection visit per year.

Inspections shall invariably include:

- The IQC-scheme of the certificate holder and the results of calculations carried out by the certificate holder;
- The correct use of marking;
- The compliance with the requirements according to chapter 2 and 3.

The findings of the inspection visits performed shall be traceably recorded, by the certification body, in a report.

### **7.4 Sanction policy**

The sanction policy is available through the service page on the website of Kiwa.

The weighing of the non-conformities is as follows:

- A major non-conformity is applicable in case the claim in the raw material passport cannot be verified (by e.g. insufficient evidence according to chapter 3) and in case the claim in the raw material passport is not confirmed by the evidence presented;
- All other non-conformities observed are to be regarded as minor non-conformities.

See for further explanation and guidance regarding minor and major non-conformities the above-mentioned sanction policy.

## 8 Titles of standards

### 8.1 Public legislation

Law/regulation	Title	Version
2008/98/EC	Waste Framework Directive	2008

### 8.2 List of normative documents

Standard <sup>1)</sup>	Title	Version
NEN-EN ISO/IEC 17020	Conformity assessment - General criteria for the operation of various types of bodies performing inspection	2012
NEN-EN ISO/IEC 17021	Conformity assessment - Requirements for bodies providing audit and certification of management systems	2015
NEN-EN ISO/IEC 17065	Conformity assessment - Requirements for bodies certifying products, processes and services	2012
NEN-EN-ISO 14021	Environmental labels and declarations - Self-declared environmental claims (Type II environmental labelling)	2016
NEN-EN-ISO 14025	Environmental labels and declarations - Type III environmental declarations - Principles and procedures	2010
NEN-EN-ISO 14040	Environmental management - Life cycle assessment - Principles and framework	2006
ISO/IWA 19	Guidance principles for the sustainable management of secondary metals	2017
ISO/CD 59014	Secondary materials — Principles, sustainability and traceability requirements	Under development
NEN-EN 15343	Plastics - Recycled Plastics - Plastics recycling traceability and assessment of conformity and recycled content	2007
NEN-EN 10204	Metallic products - Types of inspection documents	2004
NEN-EN 13430	Packaging - Requirements for packaging recoverable by material recycling	2004
NEN-ISO 15270	Plastics - Guidelines for the recovery and recycling of plastics waste	2008
NEN-ISO 22095	Chain of custody - General terminology and models	2020
CEN/TR 13688	Packaging - Material recycling - Report on requirements for substances and materials to prevent a sustained impediment to recycling	2008
IEC/TR 62635	End of life recyclability calculation for electrical and electronic equipment	2012
NEN-EN-IEC 62542	Environmental standardization for electrical and electronic products and systems - Glossary of terms	2013
2008/98/EC	Waste Framework Directive (consolidated version)	2008
Kiwa Manual K15013	Kiwa Covenant for products and processes	2022

1) The documents, in whole or in part, are normatively referenced in this document. For dated references, only the edition cited applies. For undated references, the latest edition of the reference document (including any amendments) applies.

## Annex I – Questionnaire for recycled content

1. Is a procedure in place for registration and records archived for at least 12 months to be able to fulfil the requirements of this Annex;
2. Are records available for all materials received showing name and address of supplier and supplier certificate (or other document confirming the recycle origin if applicable), batch info including material type, amount/weight, specification, date received;
3. Is a stock management system in place to identify goods coming in, stored and released traceable towards incoming batch and sold batch;
4. Are product recipes maintained describing the amounts of materials used per unit (product);
5. Is a registration in place showing material batches processed per final batch produced including:
  - a. Produced quantities;
  - b. Rejected, scrapped quantities.
6. Are the production logs available to confirm the above mentioned produced and rejected/scrapped amounts;
7. Does the certificate holder perform a volume reconciliation showing per desired period (month or year for the last 12 months) how much of which material is received, consumed per product (type) and the amount of product and rejects/scraps made;
8. Does the volume reconciliation show that purchased amounts exceed produced amount considering stock differences at the start and finish of a period;
9. Is a registration in place for all product batches sold;
10. Is a registration in place of all rejected and other material discarded off and re-used;
  - a. Product (materials) re-used will only be considered recycling for the part initially made from recycled material.
11. Is an independent inspector able to verify above mentioned items for the whole period of evaluation by selection of individual batches.
  - a. During the factory tour;
  - b. Administratively per record keeping.



## Annex II – Calculation model recycled content – example

Determination per recipe:

Recycle Content		
Material <PE>	weight <gram>	recycled content
Component A	50	50.0%
Component B	50	100.0%
% total recycle content for <PE>	100	75.0%

Determination per produced amount per period per material and totalized:

<PE>	Tons consumed	of total	recycled content	content share
supplier 1	312.0	67%	55.0%	36.7%
supplier 1	156.0	33%	45.0%	15.0%
supplier 2		0%	0.0%	0.0%
supplier 3		0%	0.0%	0.0%
Total	468.0			52%

## Annex III – Questionnaire for recyclability

Preface to the subjects:

The certificate holder substantiates the proof as requested in this Annex by means of certificates, descriptions, commercial companies acting as collectors, sorters, recyclers which are located in Europe such that they can act for as intended here.

- Example: a recycler in Asia is not applicable unless made reasonable considering environmental reasons (low scale high value recovery versus transport costs).
- Example: If a collection system is well introduced and operational but for convenience like cost versus virgin or other reasons not fully used, nevertheless this system may be considered as proof.

If a system is mentioned, a commercial or general community operated process is mentioned able to execute accordingly.

- A collection system in Spain is not to be considered representative for the Netherlands.

Recycling processes that are not commercial / industrial yet are not to be considered.

- It is foreseeable that in near future more and more complex products will be recycled and laboratory scale recycling has proven adequate. This is not to be considered as an existing process.

1. Describe the collection system for collection of the product when it reaches end of life for any reason such as mechanical or economical end of life or malfunction.
2. Describe how the product is recovered from the collection, how it is able to be recycled and how it is prevented that the product or its components is/are brought to a landfill, incineration or energy production.
3. Describe (if applicable) the dismantling process of any kind like shredding and next separating/sorting or detaching first before shredding, in case of multi material products.
  - If a material A is lost during recovering of another material B, then the recyclability of A is considered 0%. Example: PVC mantle of an electric cable is lost during recovering of the copper.
4. Describe the recycling process and which raw materials will become available and for which applications they are used.
  - Comment: see also the Waste Framework Directive, a market shall exist otherwise material may end up for incineration or other way of disposal.
5. Describe by best knowledge that in the foreseeable future the use of recycled material will be ended due to legislations like REACH.
  - Example: for PVC new European legislation (2023) prevents recycled PVC entering the market if containing more than 1,5% lead.

## Annex IV – Third party accepted certificates

For plastics:

- Recyclclass : [Recycling Process – RecyClass](#)
- Eucertplast : [European Certification of Plastics Recyclers | EuCertPlast](#)
- Corepla : <http://www.corepla.it/>
- Blue Angel : [Blue Angel | The German Ecolabel \(blauer-engel.de\)](#)
- PolyCert : [Certification schemes | PolyCert Europe](#)
- ISCC plus : [ISCC PLUS – ISCC System \(iscc-system.org\)](#)

For metals:

- EPD : Environmental Product Declaration on the basis of NEN-EN-ISO 14025 (Type III declaration) issued or reviewed by an independent third party.
- LCA : Lifecycle analysis on the basis of ISO series 14040 and issued or reviewed by independent third party.
- Kiwa Nederland B.V. : Certification according to a Covenant
- Declaration from accountant : as specified in yearly audit performed by accountant

## Annex V – Model IQC scheme

Inspection subjects	Inspection aspects	Inspection method	Inspection frequency	Inspection registration
Raw materials supplied: - recipe sheets - 3 <sup>rd</sup> party certificates from the raw material supplier	- correct raw material delivery - proof of recycled material	- document check - document check	- each delivery - each delivery	- in QMS - in QMS
Production process: - Weighing and mixing of raw materials	- percentage of recycled content	- weighing registrations - mixing calculation(s)	- Continuous - Per production batch	- in QMS / quality control card(s) - in QMS / quality control card(s)