EPD®

PROCESS CERTIFICATION CLARIFICATION
FOR THE INTERNATIONAL EPD®SYSTEM

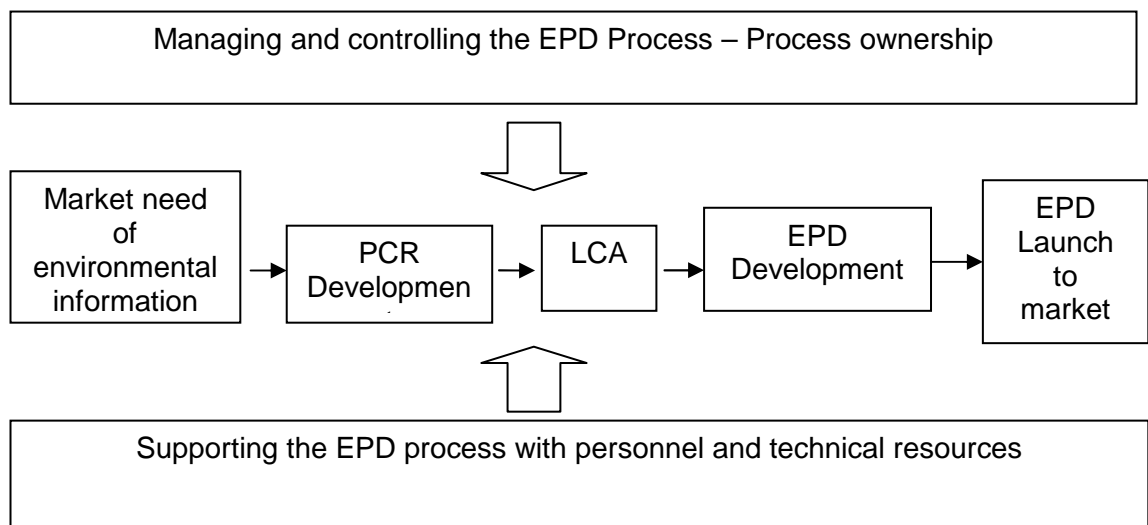## VERSION 1.0 DATED 2010-04-23

CONTENT

1   INTRODUCTION

In the normative document – General Programme Instructions – chapter 4.7 "Internal Verification (EPD process certification)" is described an activity where organisations can develop and launch EPDs without a third party certifier being involved in each case. This document clarifies how companies shall apply a systemised manner and specifically the demands that need to be verified by a third party verifier.

This clarification contains generic information in chapter 1 – 3 and 7, and normative claims in chapter 4 – 6. At third party verification the claims in the normative chapters 4 - 5 will be verified primarily.

1.1   DESCRIPTION OF THE EPD PROCESS

The activity to develop EPD shall follow a certain process pattern:

```
┌────────────────────────────────────────────────────────────────┐
│     Managing and controlling the EPD Process – Process ownership │
└────────────────────────────────────────────────────────────────┘

┌──────────────┐    ┌──────────┐   ┌──────┐   ┌──────────────┐   ┌──────────┐
│ Market need  │    │          │   │      │   │              │   │   EPD    │
│     of       │ →  │   PCR    │ → │ LCA  │ → │     EPD      │ → │  Launch  │
│ environmental│    │Developmen│   │      │   │ Development  │   │    to    │
│ information  │    │          │   │      │   │              │   │  market  │
└──────────────┘    └──────────┘   └──────┘   └──────────────┘   └──────────┘

┌────────────────────────────────────────────────────────────────┐
│  Supporting the EPD process with personnel and technical resources │
└────────────────────────────────────────────────────────────────┘
```

Such a process shall be established and controlled by necessary procedures and activities.

1.2   DESCRIPTION OF THE EPD PROCESS CERTIFICATION ACTIVITY

The internal EPD process certification process shall be outlined according to the PDCA principle:

Planning: Setting up resources needed for this activity, assessment plans and defining criteria's for approval. Records of this shall be kept.

Doing: Execute assessments according to plan, with trained internal staff at defined intervals and according to the approval criteria's. Records of this shall be kept.

Checking: Internal independent party shall verify that the EPD process certification activity is outlined well and works effectively and according to the norms.

Acting: Finally the management shall certify by a written statement that the above process works properly and effective and according to the norms. The statement shall be updated annually.

1.3 DESCRIPTION OF THE EPD PROCESS THIRD PARTY VERIFICATION ACTIVITY

The EPD process shall be verified by an independent third party verifier. Such a verifier shall be an accredited body for certification of products/processes. The verifications shall be done as an accredited service under the supervision of an accreditation body.

2 NORMATIVE REFERENCE

See ISO 14001:2004, ISO 9001:2008, ISO14040 series and the GPI norm.

3 TERMS AND DEFINITIONS

Table 1. Terms and definitions

TERM	DEFINITION
EPD	Environmental product declarations
PCR	Product category rules
PSR	Product specific requirements (former term for PCR)
CPC	Classification system used for PCR
LCA	Life cycle assessment
EPD process	Chain of activities within an organisation that links together in a certain systemised pattern, from an initial start up to a final result as the launch of the EPD.
EPD process owner	Personnel having authority and responsibility in managing the EPD process from start to final EPD.
EPD responsible publisher	Personnel having authority and responsibility regards when publish EPD to external party
EPD process assurance	An internal activity within an organisation that assure the reliability, the relevance and independence in the handling of the EPD process. The assurance of the EPDs shall have same value as if EPD has been certified by a third party verifier.
EPD process assessment	An internal activity within the organisation that regularly with certain frequency assess the EPD process to certify it appropriateness.
EPD process certification verification	An external third party verification made by an accredited body, to verify the internal EPD process assurance.

4   THE EPD PROCESS

4.1   GENERAL REQUIREMENTS

The organisation shall establish, document, implement and maintain a systemized EPD process and continually improve its effectiveness in accordance with the requirements of this PCC.

The organisation shall:

a) determine the sequence and interaction of the EPD process and other processes within the company

b) determine criteria and methods needed to ensure that both the operation and control of the EPD process are effective.

c) ensure the availability of the resources and information necessary to support the operation and monitor of the EPD process

d) monitor, measure where applicable, and analyse the EPD process, and

e) implement actions necessary to achieve planned results and continual improvement of the EPD process

Where an organization chooses to outsource any part of the EPD process that affects the conformity of the EPD result, the organisation shall ensure control over such process parts.

4.2   DOCUMENT REQUIREMENTS

The documentation of the EPD process shall include:

a) a general description of the EPD process

b) documented procedures and records required by this PCC

4.3   MANAGEMENT RESPONSIBILITY

Top management shall ensure that responsibilities and authorities related to the EPD process are defined and communicated within the organisation. An EPD process ownership shall be defined as well as a defined responsible publisher of the EPDs.

Top management shall explicitly declare its intensions and ambitions with the EPD process in form of one or several policies, strategies or similar type of documents.

Top management shall annually based on results from internal assessments and external verifications evaluate the EPD process concerning its effectiveness, relevance and appropriateness and make conclusions and actions needed for continuous improvement of the EPD process.

4.4   PROVISION OF RESOURCES

The organization shall determine and provide the resources needed to implement and maintain the EPD process and continually improve its effectiveness.

Personnel performing work affecting conformity to the EPD process requirements shall be competent on the basis of appropriate education, training, skills and experience.

The organisation shall:

a) determine the necessary competence for personnel performing work affecting conformity to the EPD process requirements

b) where applicable, provide training or take other actions to achieve the necessary competence,

c) evaluate effectiveness of the actions taken,

d) ensure that its personnel are aware of the relevance and importance of their activities and how they contribute to the conformity of EPD process requirements, and

e) maintain appropriate records of education, training, skills and experience.

The organisation shall determine, provide and maintain the infrastructure needed to achieve conformity to the EPD process requirements. Infrastructure includes as applicable,

a) workspace and associated utilities,

b) process equipment (both hardware and software), and

c) supporting services (i.e. information systems).

4.5   PLANNING OF THE EPD PROCESS

The organisation shall plan and develop the EPD process for and EPD realisation. Planning of EPD realisation shall be consistent with the requirements of the GPI norm. In planning of EPD realisation, the organisation shall determine the following as appropriate:

a) Sources and version of PCR / CPC or PSR requirements

b) Sources and version of GPI norm requirements

c) the need to specify activities within the EPD process and to provide specific resources for that (i.e. data collection, LCA calculation, LCA result review, EPD preparation, EPD review, maintenance of the EPDs validity and representativeness)

d) required verifications of the content of the EPDs delivered from the EPD process

e) records needed to provide evidence that the EPD realisation process meet the PCC requirements.

4.5.1   PCR/CPC/ PSR DEVELOPMENT OR STATUS CHECK

The organisation shall determine the requirements related to the PCR/CPC or PSR and review the EPD to be launched, prior to the realisation of EPDs and this shall ensure that:

a) PCR/CPC or PSR requirement exists

b) the organisation has the ability to meet the defined requirements.

Records such status check and actions arising from the review shall be maintained.

In case of no existing PCR for the actual product category, then organisation shall initiate the development of such rules according to the GPI norm.

4.5.2 PLANNING OF THE LCA ACTIVITY AND DEVELOPMENT OF EPDS

4.5.2.1 Planning of the LCA activity

The organisation shall plan the LCA activity according to the ISO14040 series and in connection to requirements in PCR/CPC/PSRs and other norms in the General programme instructions (GPI).

4.5.2.2 Planning of EPD development activity

The organisation shall plan the EPD development activity according to the requirements in PCR/CPC/PSRs and other norms in the General programme instructions (GPI).

In case of pre-certified EPDs, these shall be included in the EPD process as well.

If EPD process owner intends to develop "single-issue EPDs" i.e. climate declarations, these shall also be covered by the EPD process.

4.6 OPERATION OF THE EPD PROCESS

4.6.1 COLLECTING INFORMATION

The organisation shall ensure that collected data conforms to specified data need requirements. The type and extent of control applied to the data collection activity shall be dependent upon the effects the gathered information will have on the LCA result and the EPDs representativeness.

The organisation shall establish and implement controlling activities necessary to ensuring that the information used in LCA for EPDs will be relevant, consistent and up-to date.

4.7 OPERATION OF THE LCA ACTIVITY AND DEVELOPMENT OF EPDS

4.7.1 OPERATION OF THE LCA ACTIVITY

The organisation shall plan and carry out LCA activities under controlled conditions. Controlled conditions shall include, as applicable:

a) the availability of information that describes the characteristics of the actual product group

b) the availability of work instructions, as necessary

c) the use of suitable equipment

d) the availability and use of peer reviews of LCA results

4.7.2 OPERATION OF THE EPD DEVELOPMENT ACTIVITY

The organisation shall plan and carry out EPD activities under controlled conditions. Controlled conditions shall include, as applicable:

e) the availability of information that describes the characteristics of the actual product group

f) the availability of work instructions, as necessary

g) the use of suitable equipment and communication tools

h) the availability and use of internal or external verification of EPDs

Some information in EPDs are not connected to LCA, but shall be planed and controlled similarly, securing sources and quality of data.

According to the GPI norm, EPDs shall include mandatory statements. The part concerning third party verifier will in this context mean the third party verifier certifying the EPD process.

4.7.3   MAINTENANCE OF THE EPD DURING ITS VALIDITY

The organisation shall preserve the developed EPDs representativeness during its scheduled time of validity by keeping an EPD register for valid EPDs.

The EPD process shall contain measures that identify changing conditions that risks making the EPDs out of date or not representative. Efficient control and applicable action shall be applied to such identified risks.

5   EPD PROCESS ASSURANCE

5.1   EPD PROCESS ASSESSMENT

The organisation shall conduct internal EPD process assessments at planned intervals to determine whether the EPD Process:

a) conforms to the planned arrangements, to the requirements of this PCC and to the EPD process requirements established by the organisation

b) is effectively implemented and maintained

An assessment programme shall be planned, taking into consideration the status and importance of the activities within the EPD process to be assessed, as well as the results of previous assessments. The assessment criteria, scope, frequency and methods shall be defined. The selection of assessors and conduct of assessments shall ensure objectivity and impartiality of the audit process. Assessors shall not assess their own work.

A documented procedure shall be established to define the responsibilities and requirements for planning and conducting assessments, establishing records and reporting results. Records of the assessment results shall be maintained.

The management responsible for the activity being assessed shall ensure that any necessary corrections and corrective actions are taken without undue delay to eliminate detected nonconformities and their causes. Follow up activities shall include verification of the actions taken and the reporting of these results.

5.2 EPD MANAGEMENT REVIEW

Top management (or representative having the role as EPD process owner) shall review the organisations EPD process at planned intervals, to ensure its continuing suitability, adequacy and effectiveness. This review shall include assessing opportunities for improvement and the need for changes to the EPD process.

Records from such reviews shall be maintained.

5.2.1 REVIEW INPUT

The input to management review shall include information on

   a) results from internal assessments

   b) reaction from EPD audience and other stakeholders

   c) EPD process performance and EPD conformity verifications done by third party verifier

   d) status on preventive and corrective actions

   e) follow up actions from previous management reviews

   f) changes that could affect the launched EPDs, as well as the development of new EPDs

   g) recommendations for improvement

5.2.2 REVIEW OUTPUT

The main output of the review is the EPD process assurance statement, which assures the conformity of the present EPD process with the GPI and this PCC norm.

Other outputs from the management review shall include any decisions and actions related to

   a) improvement of the effectiveness of the EPD process and its activities

   b) improvement of individual EPDs related to input from EPD audience or other relevant stakeholders.

   c) resource needs.

6 EPD PROCESS CERTIFICATION

During the time of validity of EPDs following the EPD process, as a complement to the internal assurance activity, there shall be a verification done by an independent third party verifier.

The verification shall be done annually and cover the EPD process and the internal EPD process assurance activity. The verification shall follow the praxis from audit management systems i.e. ISO 14001 or ISO 9001. The verification is an accredited service and is done under supervision of an accredited body.

The result is a EPD process certificate, stating that the EPD process and EPD process assurance activity follows the GPI and this PCC norm.

A valid certificate is a necessity for an organisation for being allowed acting under the paragraph 4.7 in the GPI norm.

EPDs developed by a certified EPD process according to this PCC, shall be considered as equal to a third party certified EPD.

7   CORRESPONDENCE BETWEEN THIS DOCUMENT AND THE GENERAL PROGRAMME INSTRUCTIONS 29/2-2008 CHAPTER 4.7

Table 2. Correspondence between this document and the Genereal Programme Instructions 29/2-2008 chapter 4.7

PCC TEXT	PCC CHAPTER	GPI TEXT	GPI CHAPTER
Description of the EPD process certification activity	1.1 (1.2)	Established written guidelines and instructions for the activities related to the EPD process certification	4.7.1
Description of the EPD process certification activity	1.1 (1.2)	Secured a reliable enforcement and maintenance of the activities related to the EPD process certification	4.7.1
Description of the EPD process certification activity	1.1 (1.2)	Established procedures for collecting information how the activities related to the EPD process certification is operating and carried out	4.7.1
Description of the EPD process certification activity	1.1 (1.2)	Relevant parts of the staff engaged in the maintenance of the EPD process certification is well-informed	4.7.1
The EPD process	4.0	Reliable data handling procedures for the raw material acquisition, quality and mass of the materials in the product, information on processing/assembly, use, waste management and disposal/recycling processes being in accordance with the GPI	4.7.1
The EPD process	4.0	Relevant knowledge and data support in place to calculate the environmental performance from the original raw data.	4.7.1
The EPD process	4.0	Efficient routines established for judging the necessity to modify or update information in existing EPDs.	4.7.1
EPD process certification	5.0	Access to qualified internal auditors (independent of the organization unit in charge of the data internal collection and processing) for checking the internal EPD process	4.7.1
EPD process certification	5.0	Written procedures outlining the responsibilities and duties to be carried out by the personnel involved in the EPD activities.	4.7.1
EPD process certification	5.0	Documentation of the audit results in a properly and ordered format	4.7.1
EPD process certification	5.0	Well-functioning procedures for regularly examining the data in the EPDs e.g. to evaluate the need for updating the information due to modified data in the supply chain or in the product composition itself as well as any error or fault in the published data.	4.7.1
EPD process certification	5.0	Establishment written procedures for the management of all handling of data to the final processed data including the authorization of the document, the reviewing of the documents, ensuring the appropriate version of the documents are available and the proper identification of documents	4.7.1

Table 2. Correspondence between this document and the Genereal Programme Instructions 29/2-2008 chapter 4.7

PCC TEXT	PCC CHAPTER	GPI TEXT	GPI CHAPTER
		prepared outside the organization.	
EPD process certification	5.0	Communication of any observations relevant to the EPDs in an easy and understandable way.	4.7.1
EPD process certification	5.0	Documenting and responding to queries about EPDs	4.7.1
EPD process third party verification	6.0	Capability of the organization to manage the EPD process certification	4.7.1
EPD process third party verification	6.0	Compliance with the external verification rules for one or several EPDs, as a sample, produced under EPD process certification.	4.7.1