PROCESS CERTIFICATION CLARIFICATION FOR THE INTERNATIONAL EPD®SYSTEM

GUIDELINES

VERSION 1.0 DATED 2010-04-23

CONTENT

INTRODUCTION

EPD® according to the "General program instructions" follows the outline of ISO 14025, and the LCA activity follows the ISO 14040 series, all product related standards within ISO 14000. The part EPD® process certification will more be close to the ISO 14001 or even ISO 9001 i.e. management systems. It seem often the case that organizational departments within companies is split and normally it's not the same staff handling the product issues as those handling management system issues.

In this case however, with the EPD® process certification issue; there is a need that these two organizational parts cooperate, because they will both be highly involved in the planning and operation of this process, each expert in their area. It's the scope of this guideline to give example and propose actions suitable for an EPD® process as described in the Process Certification Clarification document (PCC). In comparison to the PCC that is a complementary norm to the GPI, no parts in this guideline is however mandatory or normative and shall just be seen as proposed action and examples.

The PCC by itself contains some guidelines in chapter 1-3 and final chapter 7, and the normative parts are just focused around chapter 4-6. This guideline will focus on the normative parts.

GENERAL REQUIREMENTS (4.1)

It could be wise to collect data and procedures for the EPD® process in a certain system manual, and if the organization already have a management system, certified or not, then the EPD® process preferably could be integrated into those management systems.

Especially there is within the term "determine the sequence and interaction…" a suitable action to describe the process and its parts as a process flow scheme. It should be possible to see management process, main process and supporting processes and how they interact. The ISO 9001 describes this well and could be a good source to study if needed. It's the idea also with such a process description that the links between activities within the

process should be identified and handled in a suitable way. Avoid more that 3 levels depth in this flow scheme else the scheme will be rather complex.

If part of the EPD® process is outsourced, it's for example often the case that consultants is used for the LCA activity, then this should also be described in the EPD process and how the organization plans to keep control of that part.

DOCUMENT REQUIREMENTS (4.2)

As proposed earlier a process flow scheme needs to be developed and it should according to this paragraph be documented as a general description.

Here is also considered all other documentation needed to describe what is done and that ensure that a failure to fulfill the GPI (the EPD®system's General Programme Instructions) and PCC norms is avoided. It could be wise to set up a register of valid steering documents as well as records kept that shows results from internal controls etc. There is always a balance here to avoid bureaucracy but still ensure that the EPD® process maintains its function even if key personnel leave the organization and other similar situations.

MANAGEMENT RESPONSIBILITY (4.3)

The term "top management" shall be seen as enough high level in the organization to be able to judge and take responsibility for the consequences of external environmental communication for the company.

Here the organization should be described, preferably as an organizational scheme where some key personnel could be identified:

- Process owner – the person or group that owns, and accordingly has been given authority and responsibility to this, the EPD® process. This must not be a person that works within any of the EPD® process activities itself, instead the important thing is to be able to take responsibility for the whole chain of activities within the EPD® process, from market need of environmental product related information to launch of EPD® to market. As such this could be a matrix responsibility.
- Responsible publisher – the person or group that takes the final responsibility of the EPD® versions that goes to launch, also considering communication strategies connected to this, and having in mind what "message" is build in the EPD® to market in relation to the organizations brand name and market profile. There is also wise to make a simple risk analyze if controversial subjects will be described in the EPD®.
- Experts needed in the EPD® process, especially LCA practitioners active in this.
- Internal auditors, which independently could audit parts or whole EPD® process.
- Outsourced functions

There is a need for the management to also explicitly declare its intensions and ambitions with the EPD® process, normally done as a policy or strategy or similar.

Annually the management shall evaluate the EPD® process, but see more of this in chapter 5.2.

PROVISION OF RESOURCES (4.4)

To be able to run the EPD® process, there will of course be a need of both personnel and technique. Management needs to plan this and install means for control that enough resources are allocated.

PERSONNEL

When having the EPD® process scheme drawn up, then the staff issue could be targeted. It's important to set up procedures that not only describe the actual situation, but also planning for a longer period ahead (at least 3 years), there might be need for back up and trainees etc.

One way of having control of this could be to develop a competence matrix, se example below:

Name	**Function**	**LCA Competens**	**PCR Competens**	**GPI/EPD Competens**	**Auditor**	**Etc.**
Mr. X	Process owner	1	1	1	1	X
Mr. Y	LCA specialist	3	3	2(3)	0	X
Mrs. Z	PCR specialist	3	3	3	(3)	X
Mr. Y	Internal auditor	2	2	2	3	X
xxx	xxxx	x	x	x	x	x

1= Basic, 2= Theoretical and some experience, 3= specialist and specially trained for this

Numbers in parenthesis means that staff might be future backup for other function.

In connection to such a matrix, there could preferably be specified level of competence.

I.e. LCA Competence:

- Technical university exam
- Participated in at least 2 LCA projects
- At least managed one LCA project as practitioner.
- Participated in LCA training course (not mandatory)

In case where staff is send to trainings there should be some sort of evidence of evaluation for the actions taken.

TECHNIQUE

Besides personnel there will be a need of other resources as well i.e. computers, LCA databases, facilities where to act. All these needs to be considered, and this could as earlier

be a suitable step after the drawing up of the EPD® process scheme and in parallel to the definition of staff need.

Also in this case it's wise to consider a longer time frame, at least 3 years.

PLANNING OF THE EPD® PROCESS (4.5)

Following the PDCA circle the EPD® process needs to have a planning activity, i.e. planning how the EPD® process and its activities should be operated. As the EPD®-PCC refers to one or several PCRs, then the planning must start with those requirements. Of course there might be upgrading of the GPI norm and it's within this planning important to check latest version to be followed. The EPD® process itself consists of several sub-activities and these needs also to be further planned. More of this is described in following chapters.

PCR/PSR/CPC DEVELOPMENT OR STATUS CHECK (4.5.1)

As the EPD®-PCC certification considers certain PCR area, there should be clear what area will be within scope and what will be outside. If organization needs to develop new PCRs then there is also within the planning to set up actions needed to upgrade the scope of certification. If Pre-certification, then the organization could act within its EPD®-PCC certificate but at same time be active and develop the PCR with target to have developed EPD® and upgraded certificate within a year.

When acting within the PCR scope given in the Certificate, then it could be wise to set up special demands for the EPD® and the LCA in the operational procedures so not forgotten.

GPI NORM TO CONSIDER (4.5.1)

If organization don´t want to refer to the GPI in the daily activity, then the GPI demands could be lifted out and put into the specific operational procedures for LCA and EPD®. It is important though to keep such procedures updated if GPI norms change.

PLANNING OF THE LCA AND EPD ACTIVITY (4.5.2)

In this planning there should be viewed what LCA activities should be performed and how it is intended to be operated, what staff should be involved and with what tools. Perhaps there is a special EPD® launching time schedule etc.

The planning of the LCA operation shall of course follow the ISO 14040 and ISO 14044 with special attention to the actual PCR and demands in GPI. If certain procedures is used as for example; allocation procedures, building models for supply chain activities, then these needs to be described as operational procedures.

If pre-certification will occur, then procedures for that needs to be installed as well, see also earlier in chapter 4.5.1.

When single-issue EPD® i.e. climate declarations is planned to be launched, then this could preferably be added to the EPD process in a similar way as for ordinary EPD®s.

COLLECTION OF INFORMATION (4.6.1)

Here it could be effective with checklists enhancing staff involved in the inventory activity with correct data demands. Complementary to this there might be needed to develop specific procedures for the data collection so this activity is kept repetitive independently who is doing it.

OPERATION OF LCA AND EPD® (4.7)

From this chapter we move from the planning what to do, to the operation of what we planned.

OPERATION OF THE LCA ACTIVITY (4.7.1)

Now this phase in the PDCA circle will be doing the actions planned earlier. It's said in PCC that those actions should be done in a controlled way.

Normally the best way to reach these controlled conditions is to perform according to a certain project model, with project target, project organization and project deadlines.

OPERATION OF THE EPD DEVELOPMENT ACTIVITY (4.7.2)

Here as in chapter 4.7.1, the controlled situation could preferably be by acting within a project model. Here though differ to the earlier when EPD® contains other information than related to LCA. That information should as well be checked by source and controlled as regarding LCA data.

MAINTENANCE OF THE EPD DURING ITS VALIDITY (4.7.3)

When the EPD® process operates, one or more probably several EPD® will be launched to market. These EPD® needs to be under supervision concerning their representativeness and validity. The simplest way is to develop an EPD® register where validity and updating is noted. Then install some ownership of this register, with responsibility to review validity dates and when necessary initiate an updating activity.

EPD® PROCESS ASSURANCE (5.0)

Now we have planned and then also done what has been planned; now it's time to check if what we planned was done as we intended.

EPD® PROCESS ASSESSMENT (5.1)

This is to be seen as what normally is called "internal audit" in a management system. Important parts in this are:

- Planning of the Audit activity; the organization needs to develop a plan or program describing when certain parts of the EPD® process should be audited, also defining who will do the audit and if applicable what criteria the audit will cover. This plan needs to be kept updated. A good rule is that the total EPD® process as a whole should be covered in an audit within a 3 year period, but critical parts needs to be audited annually or more frequent.
- Competence of the auditors. The auditors in mind shall be independent to the object they audit. They need to have sufficient competence and time resources to perform the audit in a professional manner. Competence skills do not just cover the EPD® process itself and the technique at the actual object audited, but also skills in auditing as such.
- To get the audits to be repetitive in a similar way there is a need to develop an audit procedure or checklist.
- All issues discussed, observations found as well as non-conformities (NCRs) found should be recorded. The one being audited, must be given time (normally 2 months) to clear NCRs given.
- When applicable follow up actions should be done for certain NCRs.

Records from these assessments will later be important input to management for their decisions to make the EPD® process more efficient.

EPD MANAGEMENT REVIEW (5.2)

This is what is called ”management review” in normal management systems. It’s the final step in the PDCA circle and shall consider if the operation of the EPD® process were as expected according the planning. So here should be considered when operation has been done different compare to what was planned, but also seen areas for improvement, incidents that have occurred even if they were not considered in the planning etc. All this shall be considered at appropriate decisions that needs to be taken. All will follow certain steps shown in the EPD®-PCC norm:

- Review input (5.2.1)
- Review output (5.2.2)

The input part just describes all issues to be considered and used as input to the review meeting. Normally this is done as a “pre-made” meeting protocol, with information, and later the decisions are just added. In some cases there could be better to split the input part as a “power point file”, and the output as the management protocol, especially if there is a request to keep the protocol short and simple. In the protocol from the management review there is a special demand that an “EPD® process assurance statement” should be given. The purpose of this statement is to emphasize for the management that the protocol not just is a meeting protocol but also a sort of declaration from the management that they feel confident with the EPD® process and what it delivers, and that quality assurance has been adopted in an appropriate way.

EPD PROCESS CERTIFICATION (6.0)

The EPD®-PCC document is under accreditation and organizations adopting an EPD® process could accordingly get a certificate for this activity. The scope of the certificate will be connected to number of PCRs.

The Certification process will be done by a third party certification body accredited for this. The Certification audit will accordingly be similar to an audit done for a management system, and might also be an integrated activity to such management certification audits. Some issues will be very similar and there will be synergies if organization has integrated the EPD process into its ordinary management systems. As an example could the internal audits, and management review be handled as an integrated activity.

Of course there will be a demand on the certification body from the accreditation body to adopt sufficient measures regards the certification auditors' competence.