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CENTRO PER LO SVILUPPO DELLA SOSTENIBILITÀ DEI PRODOTTI

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## **CEntro per lo Sviluppo della Sostenibilità dei Prodotti**

Overview of the revision work with:

**“EPD® - an international EPD system for environmental  
product declarations”:**

**Genova, 15 dicembre 2006**



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## ***3.1 Introduction of a new classification system for harmonisation of PCR documents***

- CPC (Central Product Classification)
- The use of the CPC system leads to a structure for PCR documents in two dimensions:
  - a “horizontal” dimension describing the product’s value chain divided according to business sectors
  - a “vertical” dimension with a further delineation of each such section into subclasses
- PCR document will be referred to as “information modules”
  - In case there exist PCR documents for up- or downstream modules will these describe the requirements for system boundaries and data quality requirements for the collection and preparation of product- and supplier-specific data – e.g. if there is an EPD available from a supplier, this information shall be used as a data source.
  - In case there is a lack of relevant EPDs, generic data sources can be used and if these fulfil reasonable quality requirements for substitution data they will be regarded as equal to specific data, otherwise the so-called “10%-rule” will be accepted to use.



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## ***3.2 Co-operation between a PCR moderator and the programme operator in developing PCRs***

- To appoint a so-called “PCR moderator” to actually take on the role as a leading person in the PCR preparation process. Among the tasks to undertake for the PCR moderator would be:
  - to help in appointing an international product category stakeholder consultation group,
  - to draft the PCR proposal,
  - to take actions to guide people in the open consultation process via the Global PCR Forum,
  - to collect comments,
  - to revise the document accordingly to the comments received,
  - to draft the final PCR proposal, and
  - to alert all people being involved in the process about the final outcome of the work and the publication of the document on the EPD website.
- The inclusion of a PCR moderator has a staged approach with the following elements:
  - Initiation
  - Preparation
  - Consultation
  - Approval and publication
  - Updating



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### ***3.3 A market-oriented approach for the international open consultation procedure***

- All suggested PCR documents must be subject to an open consultation procedure before officially being approved. The consultation phase includes the following elements:
  - Identify relevant parties to contact
  - Prepare the open consultation procedure
  - Invite people to take part in the consultation
  - Collect comments received and modify PCR draft
  - Give feed-back to the parties involved about the outcome of the consultation
- The single most important work element is to identify the relevant parties to be involved in the consultation process, a Product Category Stakeholder Consultation Group.
- Open consultations should preferably be carried out as an open internet-based participatory process making use of the Global PCR Forum.



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### ***3.4 Introduction of "sector EPDs" for entire industrial branches***

- Sector EPDs can not be used by single producers to communicate environmental performance of its own products. Consequently, sector EPDs can not be used in purchasing and procurement possibly being one of the main application of product-specific EPDs.
- All sections in a PCR referring to product-specific details shall be replaced with the same type of information as average values for the sector under study. The following aspects need to be specifically considered:
  - The product description can only refer to the general framework for using the product with limited information on technical specifications
  - All calculation rules referring to specific data shall be neglected
  - The recommended use of generic data for a specific material supplementing a product-specific PCR document can preferably be replaced with average values representing all the manufacturing sites for that specific material and the region under study, as appropriate.
  - Selected environmental impact categories can be omitted having a more restricted regional relevance compared to the overall regional coverage of the sector EPD



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## ***3.4 Introduction of "sector EPDs" for entire industrial branches***

- The verification procedure may have to be somewhat stricter compared to company-specific EPDs due to the multiple character of information from the large number of operations and manufacturing sites covering a sector EPD. The following aspects need to be handled in a specific way:
  - A verification procedure based on sample tests whereby a verifier can assure the full inclusion of all operations and manufacturing sites
  - The appointment of a responsible person for reporting all significant changes in the underlying material to the sector EPD for all operations and manufacturing sites that may lead to the necessary adjustments in the EPD
- The reporting format of the EPD shall address the following aspects:
  - A specific indication upfront that the document covers average values for an entire product category
  - A clear description of the regional area for which the EPD apply
  - A statement indicating that this EPD is not available for purchase on the market and that it can not be used for comparisons with other product categories



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### ***3.5 Broadening the concept of verification to be carried out by competent verifiers and the launch of "system certification"***

- It is important that the international EPD®system is full in compliance with the ISO standard, which should lead to the allowance for broadening of the verification process as compared to the current EPD requirements as well as the results from the Intend project.
- It is important to point out that the way the EPD is verified has been stated in the EPD, as many large organisations may want to stay with the verification requirements as they are today and indicate this to the market. It is also worth mentioning that the current verification requirements have to be followed according to the ISO standard in the case of business-to consumer (B2C) communication
- Organisations seeking system certification shall be subject to an external quality-assurance procedure carried out by an accredited certification body of the in-company qualifications for an organisation to:
  - adequately and routinely collect relevant data,
  - conduct the necessary LCA calculations,
  - prepare necessary updating of EPDs, and
  - carry out internal checks of the system on a regular basis.



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### ***3.5 Broadening the concept of verification to be carried out by competent verifiers and the launch of "system certification"***

- The overall rules system certification should include the following elements:
  - general requirements,
  - qualification criteria,
  - data collection, processing and assessment of the need for modifications/updating, and
  - internal reviews, and
  - management of documents and records.