



# Kiwa-Ecobility Experts – General Program Instruction

EPD program

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## Content

List of abbreviations.....	3
1. Introduction .....	3
2. Tasks and objectives of programme operation .....	3
3. Task of the program operation .....	4
4. Investigation framework .....	5
5. Target group .....	5
6. Program operator .....	5
7. Committee of Experts (SVA) .....	5
8. Verifier pool.....	6
9. LCA Expertgroup.....	6
10. Product Category Rules (PCR).....	7
11. Environmental declaration .....	9
12. Verification .....	11
13. Data protection .....	12
14. Arbitration process .....	12
15. Normative references .....	13
16. Imprint.....	14

## List of abbreviations

EPD	Environmental Product Declaration (EPD)
LCA	(Environmental) Life Cycle Assessment
Kiwa-EE	Kiwa-Ecobility Experts
PCR	Product Category Rules
PCR A	Part A of the Product Category Rules: General product categorisation rules for construction products
PCR B	Part B of the Product Category Rules: EPD requirements for specific product categories.
SVA	unabhängiger Sachverständigenausschuss (en: independent committee of experts)

## 1. Introduction

This document provides the basis for the general program operation for environmental product declarations (EPD) of Kiwa-Ecobility Experts (in short: Kiwa-EE). It governs the administrative and operational processes for the preparation and publication of Type III environmental declarations in accordance with ISO 14025.

The general programme instructions are updated at least every 5 years in order to adapt the programme operation to current developments in the field of standardisation, life cycle assessment methodology, etc. When the relevant standard is updated, the programme instructions are adapted accordingly.

## 2. Tasks and objectives of programme operation

The main objective of the Environmental Declaration Programme is to support companies, associations or organisations in communicating quantifiable environmental information for products and services on a European harmonised, scientific basis. To this purpose, Kiwa-EE offers a holistic program operation open to any organization, company, association, etc. to have environmental product declarations verified by independent third parties in accordance with ISO 14025 and EN 15804 and to publish them.

The verified environmental information may be intended for both business-to-business and business-to-consumer communication. It may relate to a specific or an average product.

Kiwa-EE develops and publishes the Product Category Rules (PCR) in cooperation with an independent committee of experts (SVA). In addition, Kiwa-EE develops the necessary document templates for the preparation of an EPD, and regulates the administrative and organizational tasks of a program operator according to ISO 14025.

Kiwa-EE attaches particular importance to the simple and practical use of the Implementation with simultaneous fulfilment of the requirement of ISO 14025.

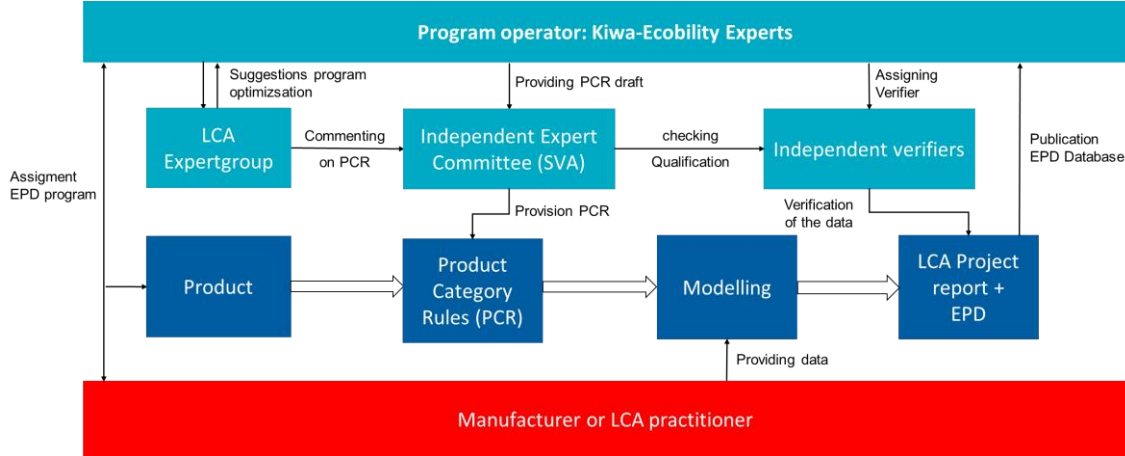


Figure 1: Overview diagram of the Kiwa-Ecobility Experts program (simplified)

### 3. Task of the program operation

Kiwa-EE acts as the program operator and administrate all tasks that are the responsibility of the ISO 14025 environmental program. These tasks are listed below:

- Providing and communicating the general program instructions
- Ensure that Type III environmental declaration requirements are followed
- Adaptation of program operations to current developments in

standardization, life cycle assessment methodology, etc.

- Establishment and involvement of interested parties (LCA Expertgroup)
- Provide and maintain a procedure that ensures data consistency within the program.
- Publication of PCRs and EPDs
- Selection and proposal of members for the Committee of Experts
- Establishment and supervision of the pool of verifiers

- Organisation of a transparent procedure for PCR testing
- Develop procedures to prevent misuse of ISO 14025 as a Type III environmental declaration program reference.

#### 4. Investigation framework

The programme is focused on the following product groups construction products, including:

- raw materials for building materials
- components, elements
- prefabricated parts
- building supplies
- technical building equipment
- packaging materials

#### 5. Target group

The target group of the program are users from the circle of the product manufacturers, the manufacturing industry and the consulting companies.

#### 6. Program operator

The financial and human resources for the operation and development of the EPD programme are provided by Kiwa GmbH.

The Ecobility Experts program operation was established by Kiwa BCS in 2017.

2021 the business was taken over by Kiwa GmbH. Kiwa GmbH is a leading specialist in the areas of testing,

inspection and certification of building materials and building products.

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The current personnel and authorities can be found in Annex I.

#### 7. Committee of Experts (SVA)

The Committee of Exerts (SVA, de. Sachverständigenausschuss) is responsible for overseeing the assurance of impartiality and neutrality in the operation of Kiwa-EE's program operations. The following tasks are carried out by the SVA:

- the technical monitoring of the programme's operation,
- review and approval of PCR designs and PCR and check for

conformity with ISO 14040 series of standards and DIN EN 14025 and the general programme instructions

- establish the quality and ensure the description of the significant environmental aspects of products,
- checking the qualifications of the independent verifiers,
- sharing information with the programme operator on the latest findings, research results and activities in the field of sustainability to ensure that the programme is always up to date.

The SVA operates independently and defines its tasks, organisation and working methods in its rules of procedure. However, the head of the programme operation shall verify that the qualifications of the individual SVA members fully fill the minimum requirements of ISO 14025, 8.2.2).

## 8. Verifier pool

The verifier pool consists of independent verifiers who meet the requirements of the programme operation and who verify EPD on behalf of Ecobility Experts.

The verifiers are recognised by the SVA.

### Requirements for verifiers

For a verifier to be included in the verifier pool, the verifier must demonstrate

working experience in the product types, the relevant industry and the relevant standards

The following requirements must be met:

- completed technical or scientific university studies
- general competences in the field of product certification (ISO / IEC 17065: 2012)
- general knowledge of industrial and product-related environmental issues
- good process and product knowledge including relevant standards within the product industry to be verified
- in-depth knowledge of the life cycle assessment methodology according to ISO 14040 and 14044 as well as the standards for EPDs (EN 15804)
- in-depth knowledge of relevant standards in the field of environmental declarations, including ISO 14025
- Knowledge of ISO/TS 14071: Critical review processes and auditor competencies
- Experience in the critical review of life cycle assessments and / or verification of EPDs.

## 9. LCA Expertgroup

The members of the LCA Expert Group will be involved in the further development of the programme operation by

- participate in the development of PCR through your expertise,
- inform interested organisations about the environmental programme or about the preparation of EPDs and PCRs, and
- Provide feedback on current program activities,

and thus contribute to the continuous improvement of the programme.

The LCA Expert Group typically includes representatives or users from manufacturing industries, planners, academia, institutions, and representatives of consumer and environmental interests. Participation is open to all interested parties and the program operator actively invites membership in the LCA Expertgroup. The programme operator's website indicates how interested parties can register and gain access to the online portal.

## 10. Product Category Rules (PCR)

Since the product groups may differ greatly in their environmental impacts, specific rules must be developed for the individual product groups, so-called Product Category Rules. The PCR, together with the General Programme Instruction, form the basis for EPDs .

A PCR is designed either for an EPD according to EN 15804.

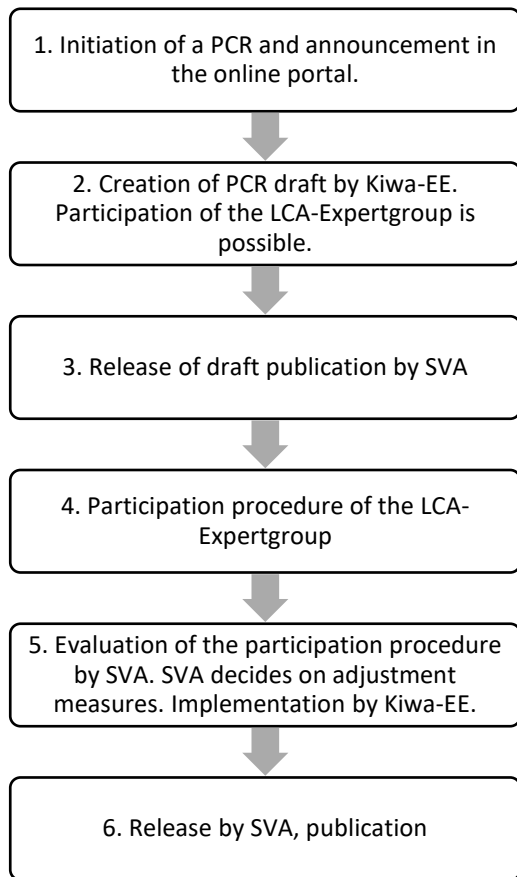
In the Kiwa-EE programme, PCRs are differentiated according to two types: PCR A and PCR B. PCR A is the document for general product categorisation rules and contains uniformly applicable calculation rules for the LCA and the requirements for the project report for all products defined in the scope of the study. Product group-specific requirements, on the other hand, are described in PCR B.

In principle, a new PCR B must be created if products are verified via Kiwa-EE and the specific available PCRs are not applicable.

The PCR shall be updated after five years at the latest. A change in the underlying regulations or new findings regarding the environmental properties of materials, substances or processes may make an earlier revision necessary.

### **Method for the preparation of a PCR B**

The path from creation/update to publication of the PCR is usually a six-step process:



The process for the creation and maintenance of PCR is organized and accompanied by Kiwa-EE.

### Method for defining the PCR

The programme operator shall ensure that product categories are defined in a transparent manner. If products have a similar function and application, they shall be assigned to a product category with the same functional unit.

### Contents of the PCR

The PCR document must include the following items:

- definition and description of the product category (e.g. description of function, technical characteristics and application)

- product group objective and scope of investigation, including functional unit, system boundary, data description, cut-off criteria, data quality requirements, etc.
- the listing of the regulations applicable to the product category (standards, technical data sheets or similar regulations) and the resulting product properties to be declared
- Information on the results of the life cycle inventory (e.g. data collection, calculation rules applied, allocations)
- description of the information to be provided for the "*downstream*" processes (construction, use and disposal phases as well as benefits and burdens outside the building life cycle)
- defined parameters for the presentation of the LCA data (data categories of the life cycle inventory and indicators for the impact categories)
- if applicable, additional materials and substances to be declared in the EPD (e.g., information on product composition including materials and individual substances that may affect human health and/or the environment during all stages of the product life cycle)



- guidance on the content and design of the EPD.
- validity of the document

### **Participation procedure of the LCA Expertgroup**

When a PCR is issued for the first time or amended, the members of the LCA Expertgroup are allowed to submit written comments via an online platform set up for this purpose. All comments submitted will be considered by the SVA. Both the comments of the parties involved and their decision on the consideration of the SVA in the forum for all members of the LCA Expertgroup are available for viewing. (The members of the LCA Expertgroup are individual and have their own areas of expertise. They therefore decide individually on which PCRs they want to actively participate.)

The SVA decides whether and which comments will be taken into account. The PCR is then published on the programme operator's website. The programme operator provides permanent and regular information via the online portal.

## **11. Environmental declaration**

Environmental declarations (EPD) are drawn up by product manufacturers (companies, associations, organisations, etc.) with or without the help of an LCA producer. The manufacturer or the

manufacturer group (e.g. association) acts as the declaration holder, i.e. it is responsible for the content of the EPD.

The validity of environmental declarations is specified in the respective PCRs. After expiry of the validity, the environmental declaration can be renewed; for this purpose, a new verification must be carried out by the verifier.

If, irrespective of validity, one of the environmental indicators deteriorates by more than 10% due to production changes, the EPD must be adjusted.

### **Declaration types (according to product specification)**

When declaring products, it must be made clear how specific it is. The following types can be distinguished:

- specific product manufactured in a plant
- specific product manufactured in several plants
- average product, manufactured in a factory
- average product, manufactured in several factories

The environmental declaration must clearly indicate which of the above-mentioned EPD types is involved. The calculation of the average product must be described transparently. Care must be taken

to ensure that the average product corresponds to the technical specifications.

### **Procedure for the preparation of the environmental declaration**

Setting up EPD includes the following steps:

1. Compilation of the process-specific data and other additional information relevant for the underlying LCA assessment and the EPD to be published according to the relevant PCR and the General Programme Instructions
2. Preparation of a project report
3. Transfer of the compiled data into the EPD format of Kiwa-EE
4. External verification

### **Environmental declaration format**

The format of the declaration is specified by the programme operator, the template for this is provided by Kiwa-EE. In principle, the content of the EPD must be presented in a comprehensible manner and meet the requirements of ISO 14025. The EPD must also fulfil the requirements of EN 15804. EPDs shall not contain judgmental or comparative statements.

### **Contents of an environmental declaration**

Each EPD shall include the following content:

- Title page (product name, brief product description, image of the product, logo of the programme operator, declaration number, date of publication, document version, indication of validity)
- Information on the EPD programme (logo, indication of the underlying PCR, declaration number, publication date, indication of validity, indication of the year of operation considered, geographical scope)
- Product-related information (clear designation of the product, manufacturer's details including address, indication of the production sites for which the EPD is representative, description of the application, technical description including indication of technical characteristics, indication of the basic and auxiliary materials, declared or functional unit and, if applicable, the expected reference lifetime of the product, brief explanation of the life cycle inventory data)
- LCA calculation rules: Description of data, data quality, background data as well as naming of the applied cut-off-rules, allocations.
- the presentation of the impact assessment

- the documentation of the life cycle assessment in the project report
- Interpretation of the impact assessment
- References
- Where appropriate, evidence or calculation guidance for users (e.g. scaling of impact assessment).
- Notes on comparability (see next section).

### **Comparability of environmental declarations**

For the assessment of comparability, the information specified in EN 15804 (5.3) and in ISO 14025 (6.7.2) must be included. In order to inform the user about the comparability of products, the EPD must contain the following statement:

" In principle, a comparison or assessment of the environmental impacts of different products is only possible if they have been prepared in accordance with EN 15804. For the evaluation of the comparability, the following aspects have to be considered in particular: PCR used, functional or declared unit, geographical reference, definition of the system boundary, declared modules, data selection (primary or secondary data, background database, data quality), scenarios used for use and disposal phases, and the life cycle inventory (data collection, calculation

methods, allocations, validity period).

For further guidance see EN 15804+A2 (5.3) and ISO 14025 (6.7.2)."

## **12. Verification**

Verification ensures that the project report and the environmental declaration are complete, meaningful, transparent and comprehensible. The presentation must be credible and neutral and the specified format must be used for the declaration.

In accordance with ISO 14025 verification shall be carried out externally before publication of the environmental declaration.

The verification includes the examination of the submitted environmental declaration, in particular with regard to

- of the underlying data used for the life cycle assessment,
- the calculation rules applied and the compliance with the requirements of PCR and EN 15804,
- the presentation of the impact assessment,
- the documentation of the life cycle assessment in the project report.

Verification is carried out for both the formal and content parts of the documents. Particular attention is paid to the processes and assumptions that have a major influence on the overall result of the

LCA. In addition, it is checked whether the specified calculation rules have been adhered to and whether the LCA has been documented in a comprehensible manner. To this end, the verifier must check whether the calculations are based on the specified life cycle inventory data and whether the specified impact factors have been applied.

Independent verifiers for external verification are selected by Kiwa-EE (see section 8). Regardless of whether the verification is carried out internally or externally, the verifier must not be involved in the preparation of the LCA and the resulting environmental declaration.

Kiwa-EE provides the verifier with a checklist that has to be used for checking the project report and the environmental declaration. This document is also used for communication between the verifier and the LCA practitioner. The document is confidential and won't be published.

The performance and result of the verification must be documented by the verifier in the verification report. A template provided by Kiwa-EE must be used for this purpose. The report is the property of Kiwa-EE and can be viewed by external parties on request.

### 13. Data protection

The project report contains company-internal, company-secret and not publicly accessible plant data, which is only accessible for verification by employees of the program operation, the SVA and the appointed responsible independent auditor. Otherwise, we refer to the general data protection of Kiwa Deutschland GmbH.

<https://www.kiwa.com/de/en/privacy-statement/>

### 14. Arbitration process

In the event of complaints that cannot be resolved between the head of program operations and the client, the client or the chairperson of the SVA may initiate mediation proceedings in accordance with the Mediation Rules of the *Deutsche Institution für Schiedsgerichtsbarkeit e.V.* (DIS) (German Institution of Arbitration), which the parties must agree to conduct. In the course of this process, the parties involved will attempt to resolve all problems amicably. If it is not possible to settle the differences of opinion amicably within 60 days of the request to commence mediation proceedings, legal recourse shall be open. The same shall apply if negotiations are not commenced within 30 days of receipt of the request.

## 15. Normative references

ISO 14025	Environmental labels and declarations - Type III environmental declarations - Principles and procedures (ISO 14025:2006); German and English version EN ISO 14025:2011
ISO 14040	Environmental management - Life cycle assessment - Principles and framework (ISO 14040:2006 + Amd 1:2020); German version EN ISO 14040:2006 + A1:2020
ISO 14044	Environmental management - Life cycle assessment - Requirements and guidance (ISO 14044:2006 + Amd 1:2017 + Amd 2:2020); German version EN ISO 14044:2006 + A1:2018 + A2:2020
ISO/TS 14071	Environmental management - Life cycle assessment - Critical review processes and assessor competencies: Supplementary requirements and guidance to ISO 14044:2006 (ISO/TS 14071:2014); German and English version CEN ISO/TS 14071:2016
EN 15804	Sustainability of construction works - Environmental product declarations - Basic rules for the product category construction products; German version EN 15804:2012+A2:2019
CEN/TR 15941	Sustainability of construction works - Environmental product declarations - Methods for selection and use of generic data; German version CEN/TR 15941:2010
ISO/IEC 17065	Conformity assessment - Requirements for bodies certifying products, processes and services (ISO/IEC 17065:2012); German and English version EN ISO/IEC 17065:2012

## 16. Imprint

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