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REGULATION FOR THE VERIFICATION OF THE ENVIRONMENTAL PRODUCT DECLARATIONS AND THE CERTIFICATION OF EPD PROCESSES

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AMENDMENT HISTORY

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1. ARTICLE 1 – INTRODUCTION – EUROCERT' S PRINCIPLES

1.1 EUROCERT – EUROPEAN INSPECTION AND CERTIFICATION COMPANY S.A. (in the following EUROCERT) is a private Anonymous Company activating in National, European and international level.

1.2 EUROCERT is not involved, in any way, in providing consulting services

1.3 EUROCERT's independence is assured by its Statutory, its organizational structure and the operation of its Certification Committee.

1.4 All companies that cooperate with EUROCERT are treated equally, with exclusive object the right interpretation and implementation of Certification Standards according to this Regulation.

1.5 EUROCERT acts as a certification body of management systems against internationally recognized standards. EUROCERT also offers service / product certification (to mandatory and voluntary requirements) and acts as environmental verifier according to EC Regulation No. 1221 / 2009. Furthermore, EUROCERT operates in several countries providing accredited certification services.

2. ARTICLE 2 – AIM AND SCOPE OF THE REGULATION

2.1 This Regulation defines the procedures applied by EUROCERT for validating or pre-certifying the Environmental Product Declaration (hereinafter known as EPD) and the methods for applying for, obtaining, maintaining and using it, together with suspension and withdrawal procedures.

2.2 The present regulation complies with ISO 17065, ISO 14025 standards and with EUROCERT's Regulations ΔΠ 13.1 for management systems certification and 13.27 for product certification, which can be used in conjunction in order to fulfill the aim of the objectives of the product EPD verification / process EPD certification.

2.3 The terminology used in this document complies with that used in the following standards: ISO 17065, ISO 14001, ISO 14020, ISO 14025, ISO 14040, ISO 14044, EN 15804, ISO 14050, EPD International AB document" General Programme Instructions for the International EPD® SYSTEM" (e.g. GPI v.3.01, v.4.0, etc, as currently updated).

2.4 In particular EUROCERT offers, within the voluntary product certifications, the Verification of the Environmental Product Declaration and the Certification of the Process EPD.

2.5 This service includes the following three types of Verification activities:

- Verification of the EPD in Pre-certification: Verification of EPD developed in absence of a PCR (Product Category Regulation) because not yet developed or expired. The validity of the EPD Verification statement in pre-certification is in this case 1 year. This service does not include surveillance activities.
- Verification of Product EPD: standard third-party Verification process (external audit). The validity of the Verification Statement is 3 years (or in accordance with the requirements defined by the Programme Operator). Surveillance activities are periodically conducted.
- Certification of the Process EPD: certification of the Organization management system and of the internal processes aimed at the design and development of LCA study and publication of EPDs for the Organization's products. The validity of the Certificate is 3 years. Surveillance activities are periodically conducted.

2.4.1 In the first two cases, three types of product EPD can be examined:

- "Full" EPD: presenting all impact categories.
- " Single-issue" EPD: focused on one of the of environmental impact categories included in the full EPD.
- "Sector" EPD": presenting all impact categories related to an average product, representative of a sector. i.e. an average of products made by different companies in a specific sector and geographical area.

2.4.2 The third service includes the Certification of the Process EPD: organization management system (PDCA model) ensuring the design and development of LCA study, the internal EPD process assurance, and publication of EPDs for the Organization's products in compliance with the requirements of the Programme Operator Regulations. The Verification in this case follows the practice from audit management systems.

2.6 This document regulates the certification services and the Organization is contractually bound to comply with the requirements set out therein. The terms and conditions in this document are applied with independence and impartiality to all organizations that apply or have access to EUROCERT Certification Services. Organizations are therefore committed to supply EUROCERT with all the documents defining the system and its implementation co-operate as is necessary during all Verification activities, by providing access to all information, staff and areas of the premises, as deemed necessary by the audit team to evaluate the conformity to the applicable standard identify its own Representative to support the audit team and ensure that the consultant of the Organization assisting to the audit maintains the role of observer.

2.7 This Regulation is approved by EUROCERT's Managing Director and each amendment ought to be approved by him. In cases of amendment, the applications that have been submitted are reviewed by the Secretary, the non-informed clients are identified according to the current issue and they are sent the valid issue which is recorded on the application.

2.8 The implementation of this Regulation is supervised by the Certification Committee. The latter is an independent to EUROCERT Committee in which interested parties to the certification in the sector of products/ services are represented. The Certification Committee has defined its representatives of the following organizations to examine the subjects concerning the certification of products / services:

- Representative of SEV (Hellenic Industry Association)
- Representative from EK.POI.ZO (Consumer Association)
- Representative of the Benaki Phytopathological Institute
- Representative from E.P.P.E.(Union of Environmental Scientists)
- Member of the Board of EUROCERT

3. ARTICLE 3 – DEFINITIONS

3.1 **ENVIRONMENTAL PRODUCT DECLARATION (EPD):** an independently verified and registered document that communicates transparent and comparable information about the life-cycle environmental impact of products.

3.2 **IMPACT CATEGORY**: categories used to aggregate the results of the inventory phase of an LCA and express them in terms of potential environmental impact.

3.3 **ENVIRONMENTAL PERFORMANCE**: the results of an Organization's management of its environmental concerns.

3.4 **PRODUCT CATEGORY REQUIREMENTS (PCR)**: A set of specific requirements that must be considered when identifying the requisites for carrying out the LCA study and for publishing the EPD for each product or group of products. The way of issuing and registering the PCR is described in the GPI document, ARTICLE 3.

3.5 **PRODUCT SYSTEM**: Elementary set of process units, linked together as regards materials and energy, which satisfy one or more defined functions. The term "product" used on its own does not just include product systems but it may also include service systems.

3.6 **PROCESS UNIT**: The smallest part of a product system for which data has been collected during the life cycle assessment.

3.7 **LIFE CYCLE ASSESSMENT (LCA)**: Compilation and evaluation of a product system by means of its entire life cycle of incoming and outgoing flows, together with its potential environmental impacts.

3.8 **LIFE CYCLE IMPACT ASSESSMENT (LCIA):** Phase of the life cycle assessment aimed at understanding and forecasting the extent and importance of the potential environmental impacts of a product system.

3.9 **FULL EPD**: Environmental Product Declaration including all the information related to the consumption of raw materials and the environmental impact categories contained in the EPD International AB document "General Programme Instructions for EPD".

3.10 **SINGLE ISSUE EPD**: Environmental Product Declaration containing information related to a single environmental impact category (i.e. declaration related to greenhouse gas emissions: climate declaration).

3.11 **EPD PROCESS CERTIFICATION**: Certification of the internal verification process of EPD.

3.12 **SECTOR EPD**: Environmental Product Declaration containing the average product/service data related to the production-sites of several organizations belonging to the same production sphere and geographical area.

4. ARTICLE 4 - REFERENCE DOCUMENTS

- ISO/IEC 17065 «Conformity assessment — Requirements for bodies certifying products, processes and services»
- General EPD Programme Instructions
- EN 15804:2012+A2:2019, Sustainability of construction works - Environmental product declarations - Core rules for the product category of construction products [Product Category Rules (PCR) for Construction products]
- PCR 2019:14 CONSTRUCTION PRODUCTS
- c-PCR-001:2019 COMPLEMENTARY PRODUCT CATEGORY RULES (C-PCR) TO PCR 2019:14
- EN 16908 Cement and building lime. Environmental product declarations. Product category rules complementary to EN 15804
- ISO 14025:2006, Environmental labels and declarations – Type III Environmental declarations – Principles and Procedures
- ISO 21930:2017 Sustainability in building construction – Environmental declaration of building products

- ISO 14040 Environmental management – Life cycle assessment – Principles and framework
- ISO 14044 Environmental management – Life cycle assessment – Requirements and guidelines
- ISO 14020 Environmental labels and declarations — General principles
- ISO/TS 14071 Environmental management — Life cycle assessment — Critical review processes and reviewer competencies: Additional requirements and guidelines to ISO 14044:2006
- ISO 14021:2016 Environmental labels and declarations — Self-declared environmental claims (Type II environmental labelling)

5. ARTICLE 5 - GENERAL

5.1 All companies irrespective of size or scope may submit an application to EUROCERT regarding product certification.

5.2 EUROCERT's Management as well as personnel (permanent staff and external associates) deal all incoming information during the certification process as highly confidential and adhere to the Code of Ethics

5.3 The interested company ought to know that all documents that are issued by EUROCERT are the latter's property and as such any further duplication and distribution to third parties without the latter's permission is prohibited.

5.4 The term product means any goods or services, regardless of their use or position in the production cycle. EUROCERT bases its EPD verification on a Life-Cycle Assessment (hereinafter known as LCA) which complies with the requirements specified in the ISO 14040 and ISO 14044 series of standards.

The EPD may be developed for any kind of product and must not contain comparisons between products. Groups of similar products or services may be included in the same EPD.

Products/services are considered "similar" if they are:

- covered by the same PCR
- produced by the same company with the same production process (core process phase).

Similar products with differences between the mandatory impact indicators lower than +-10% may be presented using the impacts of an environmental representative product. Similar products with differences between the mandatory impact indicators higher than +-10% may be presented in the same declaration documents but reported separately so that the differences are clearly stated and in such a way to guarantee a reasonable number of pages.

5.5 Access to the EUROCERT services considered in this Regulation is open to all Organizations and does not depend on whether they belong to an association or group. EUROCERT will apply its current fees for certification activities, guaranteeing fairness and uniformity of application for each type of product.

5.6 In the sphere of application of this Regulation, EUROCERT does not provide Organizations with consulting services for drawing up their LCA and/or writing the EPD, or for preparing related documents.

5.7 The verification system foreseen in this Regulation constitutes an application of ISO 14025 for type III environmental statements and assesses:

- conformity of the LCA of a well-defined product, developed on identified production-sites using a determined production process, with the reference Product Category Regulations (hereinafter known as PCR), the GPI document of the EPD International AB and with the ISO 14040 and ISO 14044 standards
- compliance of the EPD, based on the results of the LCA, with the requirements of the GPI document of the EPD International AB and with ISO 14025 for the purposes of issuing a verification statement. An Environmental Product Declaration is certified on the basis of the two procedures described below.

5.8 EPD VERIFICATION: This may be requested by an Organization if the PCR relative to the product/service have already been approved and registered by the Regulatory Authority, the EPD International AB, in accordance with the GPI document of the EPD International AB. EPD verification envisages subsequent surveillance activities, generally performed at annual intervals, in order to ensure that the conditions which allowed verification to be issued in the first place still exist.

5.9 EPD PRE-CERTIFICATION (see article 11): An Organization may ask EUROCERT for this if the PCR do not exist or are being prepared. Pre-certification is valid for a maximum of one year. After the relative PCR have been approved by the Regulatory Authority, the Organization may ask EUROCERT to validate its pre-certified EPD. The verification activities performed by EUROCERT are more or less similar to pre-certification activities and are described in ARTICLE 6.

EUROCERT performs pre-certification activities in the absence of PCR or considering any PCR that have not yet been approved and registered, as long as they are consistent with the requirements specified in the GPI document of the EPD International AB. Therefore, the pre-certification control methods can differ from the general verification process, for example, as regards required documentation, requirements that must be satisfied by the LCA study, etc. For the exclusive characteristics of the pre-certification process, please consult ARTICLE 9 of this Regulation.

5.10 The body guaranteeing the certificates issued by EUROCERT (Accreditation Body) may require its observers to take part in the audits performed by EUROCERT of organizations. The participation of these observers is agreed in advance between EUROCERT and the organization. If the organization does not allow these observers to take part and the audit is successful, the EPD will be in any case validated/pre-certified, previous good result of verification, but it might not be officially registered by the Regulatory Authority and if so, the EPD cannot be considered valid and the use of relative logo is not granted. An EPD document is in fact valid just in case it's registered by the EPD International AB.

ARTICLE 6 – PROCEDURE FOR VALIDATING OR PRE-CERTIFYING THE ENVIRONMENTAL PRODUCT DECLARATION

6.1 Inquiry, pre-contracting and contracting activities

Organizations wishing to obtain verification of the product EPD or pre-certification of their EPD process must provide EUROCERT with the data relative to their organization/production and the location of the site/s where the object concerned by the EPD verification is made by sending the ΔΠ13.121-Ε02 "Application Form For Verification Of Environmental Product Declaration" form, in which the product concerned by the EPD must be defined. The request of the Organization contractually formalizes the actions performed by EUROCERT according to this Regulation.

This form includes at least the following data:

- name and address of the applicant
- location and characteristics of the production-site/s
- description of the production cycle and the product concerned by the EPD verification request
- indication of the PCR identifying the product concerned by the EPD
- type and number of EPD involved in pre-certification/verification (Full EPD, Single issue EPD, Sector EPD, EPD Process Certification)
- number of sites from which the average data were taken for the LCA study (only in the case of Sector EPD)
- indication related to the existence of a reference site for all the data collected from the other production-sites (only in the case of Sector EPD).

For specific certification schemes and / or industry sectors, regulatory requirements for certification can be supplemented by specific Technical Regulations or Circular letters issued by the Accreditation Body.

On receipt of the Application form, and after a preliminary review to check they are complete, EUROCERT will inform the Organization of its acceptance of the request in writing. Afterwards, EUROCERT performs an initial evaluation in order to prepare an offer, using the template ΔΠ13.121-Ε03 "Offer for EPD Verification / Certification Agreement":

- verification of any points of the application not filled in or to be clarified with the client
- verification of the scope of the certification with reference to EUROCERT accreditation
- verification of the expiry date of the PCR validity, if present
- verification of the PCR and corresponding COC-basic module code, the sites and countries in which the organization operates
- verification of the EPD type subject to audit and the number of EPD and products subject to verification
- definition of a sampling plan of the EPD in the case of application of the EPD Process Certification
- verification of the need to control the applicable environmental legislation, in the case of absence of a certified EMS/EMAS
- verification if it's a verification transfer
- verification of the existence of the resources and competences needed to perform the verifications in the time scheduled.

The following documentation must be sent to EUROCERT together with the application, or at least before the site audit:

i. copy of the EPD concerned by the verification request (in the case of Single issue EPD, as well as the copy of the EPD relevant to the single environmental impact category chosen, also a copy of the Full EPD published is to be sent, if the latter has not been done, a copy of the documentation indicating the environmental performance of the other environmental impact categories foreseen by the Full EPD),
ii. the LCA study or a short report (project report) of the LCA relating to the product to which the EPD refers: the submission of the data to be verified must be in accordance with the General Programme Instructions of the Programme Operator (GPI),
iii. copy of the reference PCR (for product EPD verification) approved and registered by the Programme Operator (GPI),
iv. internal procedures (available also during the on-site visit) established for acquiring, handling and updating the data used for the LCA, to revise the EPD and to detect all significant changes in the above data,
v. list of procedures implemented to maintain EPD process certification (only for EPD process certification),
vi. procedures (viewable also during the on-site visit) established to evaluate conformity to the environmental laws applicable to the product and relevant production, processes (only in the case of an organization not certified ISO 14001 and/or EMAS)
vii. list of environmental laws applicable to the product and the production process,
viii. list of EPD subject to internal verification from which EUROCERT can select some EPDs for spot checks to ensure they comply with the EPD Regulations on the basis of the formula $0.8*\sqrt{x}$, rounded up to the subsequent entire number, considering just the first decimal, with "x" corresponding to the total number of EPD issued by the organization (only for EPD process certification),
ix. list of production-sites from which the average data, included in the Sector EPD, have been obtained (only for Sector EPD).

EUROCERT reserves the right to request additional documentation to that indicated above which it may consider to be useful for assessing the conformity of the EPD and the LCA on which it is based with the reference PCR, the GPI document of the EPD International AB, ISO 14025, the ISO 14040 and ISO 14044 series of standards and this Regulation.

Once the Application is returned, together with any due controlled copies of relevant documentation, EUROCERT shall send the order confirmation to the Organization which formalize the contractual terms and conditions. The project is then assigned to EUROCERT staff responsible for ensuring the delivery of the service in accordance with EUROCERT procedures.

6.2 Verification preparation and planning

EUROCERT selects the team members for the document evaluation and for the on-site visit (stage-2 or surveillance audit) and informs them of this task. EUROCERT notifies the Organization of the names of the auditors responsible for the assessment documental review and on-site visit, the Organization may object to the appointment of the members of the audit team, giving its reasons. EUROCERT sends to the verifiers the information needed (as mentioned in par. 6.1 to perform the verification activities. On the basis of the information received, the audit plan is prepared by the Lead Auditor and sent to the Organization, together with the communication of the audit team.

6.3 Initial Certification / Verification Audit

6.3.1 Audit stages

The initial audit of Product EPD and Process EPD is conducted in two Stages:

- Stage 1: Document review (at EUROCERT premises or on-site upon approval by EUROCERT Technical Staff)
- Stage 2: On-site audit evaluation

The initial certification audit is conducted under the responsibility of a Lead Auditor of EUROCERT in accordance with the audit plans sent in advance to the Organization, which details the audit objectives and procedures.

For each audit, two meetings are held: an opening meeting (where the Lead auditor presents all the key aspects of the audit: the evaluation procedure, the classification of non-conformities and subsequent corrective actions, and confirms the Audit Team confidentiality commitment, etc.) and a closing meeting (where the outcome of the audit is communicated and any clarification on the results registered in the verification report is provided, including information on procedures and deadlines to close non conformities).

6.3.2 EUROCERT and Organization responsibilities

EUROCERT and the Organization have the following responsibilities:

a) EUROCERT coordinates audits with the organization and prepares an audit plan.
b) The organization must provide EUROCERT with the documents mentioned in par. 6.1.
c) Based on these documents, EUROCERT evaluates whether the standard requirements are considered (Stage 1) and adequately met (Stage 2).
d) If EUROCERT considers that not all requirements for certification (Process EPD or Product EPD) are met, non-conformities are issued and reported to the customer during the closing meeting and in the Verification report.
e) In the event of non-conformity, the Organization shall respond in accordance with the terms and conditions set out in the Verification report.

6.3.3 Categorization of findings

Verification findings in the case of single issue EPD, full EPD and sector EPD and EPD process certification, can be of two types: non-conformities and recommendations.

Non-conformity in the case of single issue EPD, full EPD and sector EPD means:

– total non-observance of one or more requirements of the reference PCR
– total non-observance of one or more requirements of the EPD International AB document
– total non-observance of one or more requirements of the ISO 14040 and ISO 14044 standards
– a situation which could cause:
– non-compliance with the applicable Regulations for the product
– non-compliance with one or more requirements of the EUROCERT Regulations for EPD verification
– a serious deficiency, in the opinion of the GVI on the basis of its experience, in the LCA study and/or in the truthfulness of the information contained in the EPD.

For EPD process certification, non-conformity means one or more of the following:

- total non-observance of one or more requirements of the reference PCR concerning one or more EPD sampled for checking
- total non-observance of one or more requirements of the EPD International AB document
- total non-observance of one or more requirements of the ISO 14040 and ISO 14044 standards related to the sampled EPDs
- a situation which could cause:
- non-compliance with the applicable Regulations for the product of the sampled EPDs
- non-compliance with one or more requirements of the EUROCERT Regulations for EPD verification
- a serious deficiency in the LCA study and/or in the truthfulness of the information contained in the sampled EPD
- a serious deficiency within the EPD creation and emission system.

Recommendation means:

- a suggestion for improvement purposes not directly connected with the requirements of the reference standards.

For non-conformities resolving see par. 6.3.6.

Recommendations are raised in cases of non-mandatory requirements or issues which may improve the whole EPD product verification or the EPD process certification. These findings are examined during the next audit, however their resolving is not mandatory.

6.3.4 Stage 1 - Documentation review

EUROCERT will review the documentation listed in paragraph 4.1 for conformity with the corresponding provisions of the reference standards and the critical revision of the LCA study will be made according to the contents of par. 7.3. of ISO 14040 and par. 6 of ISO 14044 the outcome of this review will be communicated to the applicant any non-conformities found in the documentation must be eliminated by the Organization to EUROCERT's satisfaction before the verification procedure can continue.

The documents referred to in 6.1 will be kept and filed by EUROCERT.

Generally speaking, the documents review should check that:

- the EPD document and the LCA study are in compliance with the requirements of the GPI and corresponding PCR
- the procedures established for updating the information in the LCA and EPD
- the procedures established for evaluation of conformity to environmental legislation applicable to all the relevant production processes and to the product (only in the case of an organization not certified ISO 14001 and/or EMAS).

These procedures may also be examined during the on-site visit.

In particular, for the EPD the following will be examined:

- the background information is presented in a transparent and understandable way
- the presentation is credible and neutral

- the declaration format follows the recommended overall lay-out
- information and guidance are given on where to find supplementary explanatory materials.

In particular, as regards the LCA, it will be verified that the data are presented in conformity with what is foreseen in paragraphs 7.3.1 and 7.4.1 of GPI. Following the positive outcome of the documents review, the time and methods of the audit visit to the production-site for the issue of EPD verification will be agreed together with the applicant.

6.3.5 Stage 2 - On-site visit

The onsite audit visit is performed on the basis of the documentation indicated in par. 6.1 and according to the audit plan in order to ascertain the correctness of the information deriving from the LCA and contained in the EPD and the implementation of the procedures for acquiring and updating such data, as well as of the other procedures necessary for EPD process certification maintenance/functioning, in compliance with the reference standard.

To assess the conformity of the product with the information contained in the LCA and the EPD, the correct evaluation and definition of the following points will also be taken into consideration:

- system boundaries
- process units considered
- methods and instruments used to collect data
- measurement of primary flows to and from the system
- procurement of raw materials/components
- transport
- production, including power consumption
- effectiveness and meaningfulness of the potential impact assessment.

The Organization, where not yet certified ISO 14001 and/or EMAS, must also provide evidence of the internal procedures and/or provisions adopted to ensure the product considered by the EPD and its production process comply with applicable environmental legislation.

The organization is required to ensure access to documents, products and sites for the evaluation of conformity, including any subcontractors.

The audit visit will be performed by qualified EUROCERT auditors and will comprise the following main points:

- an opening meeting with the Organization's responsible staff to agree on the aims and methods of the visit
- the assessment of the correspondence of the product with the contents of the LCA and the EPD in question
- assessment of the applicable environmental legislation in the case of organizations not certified against ISO 14001 and/or EMAS
- a final meeting to illustrate the outcome of the audit.

During the visit, the Organization must demonstrate the practical application of the procedures presented and the correctness and the reliability of the information contained in

the EPD. At the end of the on-site visit the Organization will be given a verification report indicating, among other things, any non-conformities found and recommendations made.

In cases that the product is manufactured in multiple sites of the organization, EUROCERT performs the sampling of the sites to be visited, according to the following rules:

- Initial Verification audit: √x of the total number of manufacturing sites
- Surveillance Verification audit: 0.6*√x of the total number of manufacturing sites
- Renewal Verification audit: 0.8*√x of the total number of manufacturing sites,

where x is the total number of the manufacturing sites of the organization for the specific product under the verification scope.

6.3.6 Non-conformities resolving

The Organization may make any reserves or observations concerning the non-conformities or findings made by the EUROCERT auditors on the relative space in the verification report. After analyzing the reasons for any non-conformities indicated in the above report, the Organization must inform the Lead Auditor (Verifier) of its proposals for corrective action and the date envisaged for its implementation. The Lead Auditor will communicate its acceptance of the above proposals to the Organization.

For the verification process of single issue EPD, full EPD and sector EPD to continue, all non-conformities issued are to be positively solved by the organization and accepted by the Lead Auditor of the audit team.

For the EPD process certification procedure to continue, all major non-conformities are to have been positively resolved by the organization and accepted by the Lead Auditor of the audit team. Minor findings may be resolved during the subsequent certification surveillance audit, provided the organization has sent the corrective action proposals and these have been accepted by the Team Leader.

The findings relevant to the EPD document, regardless of whether they are identified as non-conformities and/or recommendations, are in any case to be resolved by the organization so that the verification/pre-certification process can continue. The Organization shall provide to Lead Auditor, within the timing specified in the audit reports, the related causes and corrective actions taken or planned to close the non-conformities within a set timeframe; Lead Auditor will subsequently verify its implementation and effectiveness and will decide if the documentation is adequate or a supplementary audit must be performed.

The verification process is suspended if major non-conformities with the reference standard are not resolved into the required period (3 months). In these cases, a supplementary audit must be performed within 6 months, aimed at checking the proposed corrective action has been implemented if this audit is successfully concluded the EPD verification process is resumed. If the above deadline is exceeded, the LCA and the EPD will be totally reviewed again within 12 months from the date of the finding.

If this 12-month period expires and the audit has not been successfully completed, EUROCERT reserves the right to terminate the verification process and charge the time and expenses

spent up until that moment. In these cases, if the Organization wishes to continue with EUROCERT certification, it must repeat the whole procedure by presenting a new application. In special cases and at its discretion, EUROCERT may vary the above deadlines following a motivated request by the Organization.

6.3.7 Post audit activities

6.3.7.1 General

Following the successful outcome of closing any non-conformities, EUROCERT will verify the EPD by signing the EPD after each page has been identified. A final verification report containing a verification statement, related to conformity of the product/service with the reference Regulation, is issued together with the verified EPD and is sent to the organization for sending them to the EPD Secretariat.

Upon organization's request, further certificates may be issued as a result of national or international agreements between EUROCERT and other Certification Bodies for the purposes of the mutual recognition of EPD validation.

In the case of a decision not to issue the verification statement, EUROCERT will inform the organization in writing, giving its reasons. The organization is required to pay for the verification activities foreseen in the accepted offer, also in the case of a negative conclusion of the verification process. Following verification or pre-certification of the EPD by EUROCERT, the Organization will directly request the Competent Body (e.g. EPD® SYSTEM) to register it and then publish it on its internet site.

6.3.7.2 Issuance and Validity of the Verification Statement / Certificate

When EUROCERT is satisfied that the Organization meets all the certification, it will inform the Organization and issue a Certificate / Verification Statement depending whether a Process EPD or a Product EPD was requested.

In particular:

a) Product EPD: for each Product EPD verified and validated, EUROCERT will issue a Verification statement in compliance with the provisions of the applicable standards and regulations.
b) Process EPD: EUROCERT will issue a Certificate in compliance with the provisions of the applicable standards and regulations.

Otherwise, EUROCERT notifies the Organization of the decisions taken and the actions to be implemented.

The EPD Verification Statement or the EPD Process Certificate issued contains its expiration date, which has duration 5 years in the case of Product EPD and 3 years in the case of Process EPD. In order the certificate to be valid, all the subsequent annual surveillance audits have to be carried out in order to confirm that the system complies with the applicable standards and regulations.

With a reasonable advance on the expiry date (approximately 40 days), in order to ensure the continuity of the certification and the original Certificate number, a renewal audit must be carried out.

On completion of the verification phase, the documents are sent to the Organization by E-mail or Ordinary Mail.

The Certificate / Verification statement will remain valid, until its expiry date, unless the annual surveillance reveals that the management system and / or products of the Client no longer meet the standards, norms or regulations.

The Certificate / Verification statement shall remain the property of the Certification Body and the Organization shall send it back to EUROCERT in case it is changed or cancelled. The Organization's right to use the certification mark / EUROCERT Certificate (in cases of process EPD certification) or Verification statement is contingent on maintaining a valid Certificate in respect of the certified management system or products and compliance with the Regulations governing the use of the Certification mark / Certificate or statement issued by EUROCERT. The Certificate / Verification statement issued by EUROCERT is issued in English; Certificates / Verification statements in a different language can be issued on request and according to the terms and conditions expressed in the certification proposal.

EUROCERT reserves the right to reissue a revised Certificate / Verification statement where mistakes have been spotted in the verification report after the verification report has already been issued to the client for further submitting to the competent authority.

6.3.7.3 Registration of the EUROCERT Certificate / Verification statement and of EPD logo

The issuing of the Certificate / Verification statement is registered in a database that identifies its status over time (valid - suspended - withdrawn).

Use of the EPD logo is governed by the General Program Instructions set by the Programme Operator.

The Organization may not use or refer to the EPD logo of the Programme Operator without the formal registration of the EPD document by the Programme Operator itself. EUROCERT declines any liability if the Organization uses the EPD logo incorrectly.

6.3.7.4 Use of Certificate / Verification Statement

The Organization may refer to the Certificate / Verification statement obtained in its publications, in its correspondence, on business cards, etc. In any case, the use of the Certificate / Verification statement must be such as to be consistent with the purpose of Certification / Verification and with the products and / or services referred to therein.

The conditions for using the EUROCERT Certification / Verification statement are set out in a separate document that is sent to the Organization together with the Certificate / Verification statement issued.

EUROCERT will take any action deemed appropriate, at the expense of the Organization, to deal with incorrect or misleading references to Certification / Verification or use of Certificates / Verification Statements and / or of the certification mark (e.g. suspension or withdrawal of Certificate, legal action and / or publication of the transgression).

The Organization shall immediately cease to refer to the Certificate / Verification statement

i. after the expiry, suspension, cancellation, withdrawal of the Certificate / Verification statement

ii. in the event of any change in the system / process / product not notified and accepted by EUROCERT
iii. if EUROCERT modifies the rules of the certification scheme and the Organization does not intend to comply
iv. any other circumstance that could adversely affect the certified system.

EUROCERT verifies the correct use of the Certificate / Verification statement or mark during the surveillance audits. In case of incorrect use, EUROCERT will take suitable actions which may include the request of major corrective action suspension or withdrawal of Certificate, legal action and / or publication of the transgression.

The Certificate / Verification statement shall remain the property of the Certification Body and the Organization shall send it back to EUROCERT in case it is changed or cancelled.

The Organization's right to use the certification mark / EUROCERT Certificate or Verification statement is contingent on maintaining a valid Certificate in respect of the certified management system or products and compliance with the Regulations governing the use of the Certification mark / Certificate or statement issued by EUROCERT.

The Certificate / Verification statement issued by EUROCERT is issued in English. Certificates / Verification statements in a different language can be issued on request and according to the terms and conditions expressed in the certification proposal.

ARTICLE 7 – EPD RENEWAL

7.1 EPD registration lasts for a determined period, called the "revision period", at the end of which the EPD must be subject to a validation renewal process. The revision period may range from one to five years in case of application of the GPI. EUROCERT establishes its duration by notifying the Organization and considering the frequency defined in the procedures for updating the data deriving from the LCA, and the existence of a quality and/or environmental Management System as indicated in the GPI document of the EPD International AB.

7.2 Approximately three months before the date of expiry, the Organization must inform EUROCERT whether or not it intends to renew its EPD validation it must follow the procedures described in ARTICLE 5 and attach the relative documentation to the request. This must be limited to the variations that took place since the previous validation.

The following must be sent to EUROCERT in all cases:

a) the definitive and updated LCA report
b) a copy of the new EPD to verify
c) the procedures established to assess compliance with the environmental legislation applicable to the product and pertinent production processes (only in the case that the organization is not ISO 14001 and/or EMAS certified), verifiable during the on-site visit.

7.3 EPD verification will take place following the positive outcome of the review of the product LCA study and the EPD and an audit on-site visit which is generally performed using the same criteria as the initial verification audit. In particular, a new documents review will be

performed to assess any modifications made to the LCA and the consequent updating of the information and data contained in the EPD.

7.4 Following the positive outcome of the documents review considered in par. 6.3.4 a new on-site visit will be made to the production-site, using the same criteria indicated in par. 6.3, in order to assess the following main points:

- the general correctness of the information contained and updated in the LCA and EPD
- the application of the procedures established to update the data used for the LCA and to revise the EPD
- conformity of product characteristics with the declarations of the Organization in the EPD
- any significant variations concerning the product or production process covered by the EPD
- assessment of the applicable environmental legislation in the case of organizations not ISO 14001 and/or EMAS certified.

7.5 In particular cases and, in any case, at EUROCERT's discretion (for example, audit carried out on-site the previous year during surveillance, site is purely for marketing and not production, EPD of non-mass produced products, impacts associated with product assembly phase (core processes) very low compared to the contributions of the other assessed phases (upstream and downstream processes)), with the exception of EPD Process Certification, the document analysis can be considered sufficient to assess compliance with the reference standards without the need to perform an on-site audit for a specific site(s).

7.6 The frequency of the renewal audits will be established by EUROCERT on a case-by-case basis, according to the contents of par. 6.1, and may be modified by EUROCERT depending on the audit results. Audit dates will be agreed, together with the Organization, with sufficient notice and will be officially confirmed at least one week before the audits take place.

7.7 EUROCERT will notify the Organization in writing of unsuccessful periodic verification of its EPD by registered post and a copy will be sent to the accreditation body and to the EPD International AB for relative deliberation.

ARTICLE 8 – MAINTENANCE OF EPD REGISTRATION AND PERFORMANCE OF ANY SURVEILLANCE OR SUPPLEMENTARY AUDITS

8.1. General

Maintenance of registration is subject to compliance with the conditions described in this Regulation and with the reference standards indicated in ARTICLE 4.

In particular, validity of the registration is dependent on the fact that the Organization keeps the various parameters, which constitute the basis of the LCA and of EPD process certification (the latter only for EPD process certification), under control according to procedures previously examined by EUROCERT.

During the validity of the EPD, EUROCERT periodically carries out surveillance audits to make sure that the requirements which led to the issue of verification statement in the first place continue to be complied with. Surveillance audit are carried out annually.

Surveillance could be performed on a documental basis or as an on-site audit or through a mix of these two types of activities. If an organization does not provide the necessary documental evidence to perform the assessment or if the organization notifies EUROCERT of relevant changes to the production process, surely an on-site audit of the organization will be performed.

There are two cases of surveillance audits:

-Product EPD Surveillance: The objective of the product's EPD Surveillance audits is to assess whether the content of the document is still consistent with what was validated in the initial audit. The procedures and times of Product EPD surveillance must be agreed upon with the customer in the initial audit. Surveillance activity, which can also be carried out as a documents desk review, should enable the assessment of the main environmental aspects of LCA calculation. The EPD must be updated in case of significant change. The calculation of the time periods of the surveillance must be carried out on a case-by-case basis, depending on the extent of the changes made to the EPD. Any non-conformity (major) will have to be managed within the times set out in the Audit Report. During the 5 years period of validity the product EPD validation, the maximum number of annual surveillance audits are 4, apart of those are due to changes. If no changes take place since the previous audit, the annual surveillance audit may be carried out as a documents desk review.

-Process EPD Surveillance: On-site periodic surveillance audits shall be carried out annually during the period of validity of the Certificate (2 surveillance audits per 3 years), to grant that the system is maintained and potential issues identified in the initial audit are addressed. The duration of the surveillance audit is calculated on a case-by-case basis, depending on the number and significance of the changes made to the process EPD. Any non-conformity must be managed within the times set in the Audit Report.

8.2 Conduct of surveillance audits

The periodic surveillance activities involving both document reviews and site audits are planned by EUROCERT according to the type of product involved and mainly set out to check:

- whether the procedures concerning the EPD® SYSTEM/EPD process certification have been effectively applied
- whether the data have been correctly acquired and updated
- whether the main environmental aspects have been assessed in connection with the LCA calculations
- whether the product continues to comply with the information contained in the EPD.

The methods and frequencies used to carry out surveillance activities and the documentation that the Organization must provide on request will be described in detail to the Organization together with the communication that the EPD has been validated.

The methods of performing the surveillance audit, follow the ones foreseen for the initial verification. The only changes are constituted by verification of the Regulation often in a documental manner or just on-site and the presence usually of an independent technical reviewer for the EPD for the evaluation and final approval of EPD maintenance.

The Organization has 3 months to solve the NC. In the case of no reply by the above-mentioned deadline, the validity of the EPD will be suspended.

Following the positive outcome of the independent technical review, EUROCERT informs the organization of the positive outcome of the surveillance audit and if it's necessary to re-issue the EPD document, re-issues, re-validates and sends the EPD document to the organization.

The request to publish the updated version of the EPD document on the EPD International AB website in substitution of the previous one, is the organization's responsibility.

As well as the cases for suspension established in the general contract conditions, in the case of non- conformities, the organization has 3 months in which to resolve them by sending the relevant revised documentation. If no reply is received by the above deadline, the EPD validity will be suspended.

EUROCERT also reserves the right to request additional documentation during the surveillance stage which may be required to make the relative checks.

If the Organization has a valid Environmental Management System, certified by EUROCERT according to ISO 14001 and/or EMAS, the above checks can be carried out at the same time as the periodic checks on the Management System.

In presence of a procedure for the data collection and updating / follow-up that guarantees the data updating on annual basis with the aim to detect any changes such from result in the need to reissue the EPD document during the period of validity of the document itself, the organization can opt for doing make the surveillance audits by EUROCERT "upon demand", that is EUROCERT will perform the audit just in case in which the organization, performing the annual updating, upon the basis of the data collection and updating procedure, detects the need to reissue the EPD and so contacts EUROCERT in order to perform the audit.

So, its own responsibility of the organization to apply its data collection and updating – follow-up procedure and act accordingly during the EPD validity period.

In order this option to be valid and become operative, it'll be needed that this procedure is verified and approved by EUROCERT during the audit for the EPD verification.

In case of surveillance audits performed "on demand" during the EPD validity period the organization is requested to pay just the amount of the audits done.

None EPD document updating can be issued without approval by EUROCERT.

The option of the audit "on demand" is not applicable to the EPD process certification.

8.3 Significant changes

8.3.1 Changes to the rules / requirements of the certification scheme

If substantial changes to the rules / requirements of the certification scheme are made, EUROCERT informs the Certified or Certified Organizations and takes into account the observations submitted by them. EUROCERT shall specify the date when the changes come into force and any corrective action required and the time allowed for their implementation.

In case of an update to the PCR / GPI the organization can:

- Be verified to the same version of the GPI and reference PCR as were used in the original Verification, even if they are not current, if the EPD maintains its original validity period
- Be verified to the updated version of the GPI and reference PCR. In this case a renewal of the certification is performed and the validity of the EPD may then be set based on the new approval date.

Failure to adjust the Organization to the corrective measures established, in the agreed times, may lead to suspension / withdrawal of the certification.

8.3.2 Changes to the product or processes of the Organization

The Organization shall communicate in writing to the Certifying Body any changes to the management system, products or production process that may affect compliance with standards, legally binding requirements or regulations. The Certification Body will determine whether the changes so notified will require further evaluations.

During the period of validity of the EPD registration, if significant changes (such as increasing of the environmental impacts of more than 10%) or improvements are made to the production process and/or to the product, as for example:

- product modification (design, materials, dimensions, etc.) and consequent variation in environmental impact, even in just one category
- change in the process (changes in the characteristics of the production process, in the technology used, of the Organization or a supplier) with consequent variation in environmental impact, even in just one category
- any other change that causes or generates a significant variation in environmental impact (more than 10%), even in just one category

the Organization undertakes to promptly inform EUROCERT in writing of such changes and make the necessary considerations and evaluations concerning any variations in the environmental impact of each product category defined in the EPD International AB GPI document and, where applicable, in the reference PCR.

The Organization must assess how these modifications affect the LCA of the previous product and, consequently, the contents of the validated EPD, and must communicate this information to EUROCERT.

The organization is always to comply with the requirements for EPD verification, also in the case of changes communicated to EUROCERT.

In particular, the EPD document shall be re-issued:

- if one of the environmental indicators has worsened by more than 10% in relation to the data actually published.
- If a new EPD document is re-issued the differences versus the previous version of the EPD will have to be reported.

In particular an EPD document has to be always updated and verified during its validity period in case in which there are any changes to the technology or in other circumstances that lead to:

- an increase of 10% or more of the environmental indicators declared inside the EPD

- mistakes in the information declared or
- significant changes to the information declared for the product, to the "content declaration" or to the additional environmental information.

If such changes have occurred, but the EPD is not updated, the organization shall contact the EPD Secretariat to de-register the EPD.

More in general, the organization can choose to perform the amendments or corrections to an EPD during its validity period. For changes that are related any data verified inside the EPD (for example: indicators for the environmental performance), it shall be conducted an audit.

This audit will have to be based on one of the subsequent options:

- if the audit is conducted on the same version of the GPI and corresponding reference PCR used during the previous audit for the issuance of the EPD document, even if the PCR is expired, the revised EPD will keep its original validity period
- If the audit is conducted on the current version of the GPI and corresponding current and valid reference PCR, the audit shall be conducted as initial verification and a new validity period will be defined on the basis of the new approval date.

Depending on the type of modifications made, EUROCERT reserves the right to ask for the LCA and connected EPD to be revised and to perform supplementary audits, which may be document reviews and/or audit visits to the Organization, in order to assess whether EPD registration can be maintained.

If registration cannot be maintained, EUROCERT will inform the Organization in writing of the need for a new version of the revised EPD. The Organization must inform EUROCERT whether it intends to renounce registration or renew it according to what is stated in ARTICLE 5. EUROCERT will inform the Organization that validation has been withdrawn.

A copy of the documentation relative to each revision of the LCA, of the EPD and of the procedures established to update the information and to implement and maintain EPD process certification must be made available to EUROCERT for review during the audit.

Failure to notify EUROCERT of any intended modifications may result in the suspension of the Certificate / Verification statement.

8.4 Additional audits

EUROCERT reserves the right to perform supplementary audits, notifying the Organization in writing.

The purpose of this audit can be for example:

- to verify the implementation of major corrective actions,
- to address any requests that have arisen when the Certificate / Verification statement was being issued,
- to revoke a suspension of the Certificate / Verification statement,
- on receipt of whistleblowing,
- reporting serious problems or complaints related to the system / product / Certificate,
- when the Organization makes changes to its system / product considered relevant by EUROCERT,

- in case an additional Verification of compliance with the requirements is needed (for example, following reports from the market),
- when specific requirements exist for single certification programs,
- in case of substantial modifications to the system / product, etc.

At the conclusion of the audit, the Organization receives the relative audit report. EUROCERT reserves the right to conduct non-announced audits, if necessary, motivating the reasons for such visits.

Any refusal of these audits by the Organization leads automatically to the initiation of the suspension process and / or withdrawal of the Certificate / Verification statement.

8.5 Transferring EPD validation

If the Organization obtained EPD validation from another accredited Certification Body and asks EUROCERT to carry out the subsequent validation, validation transfer will be possible when the following conditions exist:

- the organization interested in obtaining recognition of validation by EUROCERT must have sent the questionnaire for the preparation of the economic offer for the transfer
- verification statement of the Organization is issued by a Body accredited for EPD by an agency or an EPD verifier recognized by the EPD International AB
- the validation is valid in EPD registry
- the certificate has not been suspended (applicable for the EPD process certification)
- the Certification Body has not been suspended
- the product(s)/service(s) described in the EPD document fall within the accredited scope of EUROCERT, as well as the EPD type (Full EPD, single-issue EPD, sector EPD, EPD process certification).

In particular, the Organization must provide EUROCERT a copy of the validated EPD and fill in the Application Form, as indicated in ARTICLE 6 of this Regulation.

Where these conditions are met, EPD validation is transferred keeping the expiry of validity of the EPD or the certificate (in case of the EPD process certification) provided by the previous Certification Body and with it the annual surveillance audits.

Organizations holding EPD validation not covered by the above accreditation and/or prerequisites will be treated as new clients, following the validation process described in ARTICLE 6.

8.6 Complaints handling

The Organization must also keep records of any complaints it receives concerning the product and its relative environmental impact, any other events which may have had a negative effect on the environment, and any observations or reports from national or local control authorities, together with the relative corrective action adopted by the Organization, and must make these records available to EUROCERT.

During audits, EUROCERT may request, for filing purposes, an extract from the above documentation in order to have evidence of the documents structure in force at the moment such audits took place.

ARTICLE 9 – MODIFICATION, SUSPENSION OR TERMINATION OF EPD REGISTRATION

9.1 General

Organizations which intend to renounce the EPD must inform EUROCERT, in writing, of their intention not to renew EPD registration or EPD process certification registration, as referred in ARTICLE 7. The Organization may request a modification, extension or reduction of the field of application of the EPD by presenting a new validation request, as referred in par. 6.1. EUROCERT reserves the right to examine these requests on a case by case basis and decide the evaluation method for issuing new verification statement.

9.2 Suspension of the certification

The changes communicated by the organization can be checked through supplementary audits as described in par. 8.3 and 8.4.

EUROCERT has the power to suspend, for a limited period of time, the certification already granted, for reasons deemed serious, by notifying the Organization in writing. For example, suspension can be implemented when

(i) the Organization fails to properly handle complaints;
(ii) the audits point out significant deficiencies in the system / product but which, in EUROCERT's opinion, are not of such serious concern to require the withdrawal of the Certificate / Verification statement,
(iii) the Organization fails to comply with the provisions for the implementation of corrective actions,
(iv) the Organization does not readily inform the Certification Body of ongoing legal proceedings related to non-compliance with binding legal requirements,
(v) the Organization fails to comply with: the contractual obligations of EUROCERT, EUROCERT Regulation or rules for the use of the EPD logo / Certificate / Verification statement
(vi) failure / delay in receiving a Surveillance Audit for reasons not attributable to EUROCERT.

In the event of suspension, EUROCERT shall notify the organization by e-mail, fax or other equivalent means and shall notify also the conditions under which the suspension may be revoked. If the Organization fulfills the conditions set by EUROCERT within the specified time limits, the suspension may be revoked. Otherwise, EUROCERT will proceed with the withdrawal of the Certificate / Verification statement. Any subsequent withdrawal of the suspension is also made public by the same means. The costs associated with the suspension and restoration of the Certificate / Verification statement shall be borne by the Organization. The maximum duration of suspension does not generally exceed 6 (six months) calculated from the expiration date of the scheduled audit.

9.3 Cancellation of verification / withdrawal of certification

The cancellation of validation / withdrawal of certification can be performed by EUROCERT or can be requested by the Organization.

EUROCERT may cancel the Certificate / Statement of Verification, for reasons deemed to be of particular concern and providing an explanation in writing to the Organization. This can occur when:

(i) the Organization fails to comply with EUROCERT's terms for revoking the suspension of
(ii) the audits disclose deficiencies in the system deemed critical
(iii) the Organization interrupts the production and supply of the products / services mentioned in the Certificate / Verification statement for a considerable period of time (in the order of 12 months) or has gone into administration
(iv) the Organization fails to pay the amounts due to EUROCERT required by this or other contracts with EUROCERT
(v) EUROCERT modifies the rules of its certification scheme and the Organization does not intend to comply with the new requirements,
(vi) the Organization fails to properly handle the complaints
(vii) the Organization violates the agreements entered into with EUROCERT or the Organization itself requests formally
(viii) the Organization does not accept changes to the economic conditions,
(ix) for delays in scheduled audits for reasons not attributable to EUROCERT including failure to receive the renewal audit within the expiry of the Certificate / Verification statement.

The cancellation of the Certificate / Verification statement shall be officially notified to the Organization by e-mail, fax or other equivalent means and will be made public by EUROCERT (e.g. by excluding the Organization from the Register of the Certified Organizations). If, after the cancellation of the Certificate / Verification statement, the Organization continues to refer to it in any way, EUROCERT will be free to protect itself in the most appropriate manner. In case of withdrawal, no reimbursement of any expenses related to the audit work already completed by EUROCERT will be provided.

In case the Organization does not undertake the activities to maintain EPD validation (ARTICLE 6 of this Regulation) and therefore EUROCERT is unable to carry out the surveillance activities, the procedure to withdraw validation will be started. The Organization will receive a letter informing them that the withdrawal procedure has been started and subsequently a letter of withdrawal of the validity of the verification statement. Withdrawal of validity means the Organization is no longer allowed to use the EPD logo or to advertise its product as having EPD validation.

EUROCERT will send the information regarding the previous points to EPD International AB for their pertinent deliberation.

ARTICLE 10 – CONTENTS OF THE EPD

10.1 The EPD must always be used in its complete form, as validated, and all the data it contains must not give rise to ambiguous interpretations.

10.2 The EPD must contain at least the following information:

a) Cover page as requested at paragraph 9.5.1 of the GPI
b) programme-related information as required by paragraph 9.5.2 of GPI
c) Product-related information as required by paragraph 9.5.3 of GPI
d) Information related to the "content declaration" as requested at paragraph 9.5.4 of GPI
e) Environmental performance-related information as required by paragraph 9.5.5 of GPI
f) Additional environmental information as required by paragraph 9.5.6 of GPI
g) Mandatory statements as required by paragraph 9.5.2 of GPI
h) References as requested at paragraph 9.5.10 of GPI.

The EPD must contain information on the environmental performance of the product without making any judgement and/or evaluation and/or comparison with other products. All claims made about the product and contained in the EPD must be verifiable.

10.3 The contents of the EPD must be examined by EUROCERT. The Organization must inform EUROCERT of any changes or modifications made to the information contained in the validated EPD. In no case may the Organization modify the EPD without informing EUROCERT.

ARTICLE 11 - PRE-CERTIFICATION

11.1 An Organization requiring an EPD validation scheme for a product category for which the reference PCR have not yet been prepared and registered with the Competent Body may ask EUROCERT to perform pre-certification pursuant to the EPD International AB GPI at paragraph 6.1.1 and 9.5.7.

The main aims of pre-certification are:

- to simplify preparation of the PCR
- to make it easier to involve interested parties
- to provide the Organization with an initial communication and marketing instrument concerning the environmental performance of the product.

11.2 The pre-certification activities performed by EUROCERT are identical to the procedures described for EPD validation, except as otherwise specified in this ARTICLE.

11.3 If the Organization requests pre-certification, the following conditions apply:

a) pre-certification is issued for those product categories for which reference PCR have not been prepared and registered

b) Its validity is just annual, not renewable

c) in order to obtain pre-certification, the Organization must produce an LCA, as indicated in the EPD International AB GPI at paragraph 6.1.1 of the GPI

d) The contents and the EPD pre-certified format follow the ones established for the EPD validated in addiction inside the EPD pre-certified must be present the subsequent information:

- additional information on the LCA methodology and data used, including:
- functional unit or declared unit
- system boundaries
- cut-off Regulations
- allocation Regulations and
- data sources
- an explanatory statement about the pre-certification.

11.4 The period of pre-certification validity is agreed between EUROCERT and the Organization and may not last more than a year. For any other points concerning pre-certification that have not been covered above, reference should be made to the contents of the paragraph 6.1.1 and 9.5.7 of the GPI of the EPD International AB.

ARTICLE 12 - SINGLE ISSUE EPD

In the case of single issue EPD, it is necessary to send EUROCERT the information as per point 6.1.

The single issue EPD is an Environmental Product Declaration focused on only one of the environmental impact categories that is included within the full EPD. (i.e. EPD that reports only the information about greenhouse gases – called “climate declaration”).

Single issue EPD can only be made if there is a registered EPD (or if the information corresponding to environmental performance of the product as per paragraph 4.5 of the GPI is available on request, just in case of application of the GPI) and will have to include as a minimum, the following information:

- information related to the product
- information related to the company
- declaration of the environmental impact for the chosen topic based on relevant impact category for the various life cycle stages
- mandatory statements as per paragraph 4.7 of the GPI or to the section 9 of the GPI
- information on how to obtain information on the complete environmental impact of the product declared
- the declaration foreseen in paragraph 4.13 of GPI or at the paragraph 6.4.3 of the GPI.

ARTICLE 13 - EPD PROCESS CERTIFICATION

In the case of EPD process certification the Certification lasts three years, renewable on expiry of the third year. In this case, the Organization is necessary to send to EUROCERT the information as per par. 6.1. From the list of EPD validated within the company, EUROCERT will select through sampling and will ask for the documentation concerning the LCA studies and the EPD documents of the products chosen to be sent to them.

During the EPD process certification, EUROCERT performs the sampling of the product EPD under the scope of process certification, according to the following rules:

- Certification audit: √y of the total number of product EPDs
- Surveillance audit: 0.6*√y of the total number of product EPDs
- Recertification audit: 0.8*√y of the total number of product EPDs,

where x is the number of the product EPDs that is about to be issued or already issued under the process of the organization.

The aim of the audit will not only be what concerns the sampled EPD but also to verify the correct and effective application of the procedures implemented by the organization to maintain the internal verification process of the EPD produced according to annex B of the EPD International AB GPI documents respectively. The audits, in the case of EPD process certification, always include an on-site visit to the head office and to the operational site(s) of the EPD subject to sampling.

ARTICLE 14 – SECTOR EPD

For Sector EPD validation EUROCERT will examine a representative sample of production-sites from which the average values of the data used to produce the LCA study have been calculated. This sample will take into account any significant process differences among the production-sites and, if the total number of sites makes it possible, will use the site sampling as follows:

During the verification of Sector EPD, EUROCERT performs the sampling of the sites under the scope of Sector EPD, according to the following rules:

- Initial Verification of Sector EPD: √z of the total number of manufacturing sites
- Surveillance Verification of Sector EPD: 0.6*√z of the total number of manufacturing sites
- Renewal Verification of Sector EPD audit: 0.8*√z of the total number of manufacturing sites,

where z is the total number of the manufacturing sites of the organization for the specific product under the verification scope.

ARTICLE 15 - ADVERTISING – USE OF THE EPD REGISTRATION LOGOTYPE

The ways in which the EPD, relative logotype (see facsimile in annex 2) are to be used is regulated by a specific agreement between the Organization and the Competent Body.

In general, the following applies:

- the EPD may not be used or divulged until it has been approved and registered by the Competent Body,
- the advertising made by the Organization must be truthful and not give rise to doubts or misinterpretations concerning the type, category, characteristics and environmental performance of the product in question,

- It must also be drawn up in such a way as to prevent any confusion between products covered by EPD verification and others,
- the Organization may only use the EPD for the product type for which validation was issued
- any use of the EPD or EPD logo that may cause confusion with other I-type labelling systems (ISO 14024) is prohibited,
- the EPD logo can be used on the products for which the EPD as been realized and/or on their package provided in association with the website: "www.environdec.com, registration number and possibly with the corresponding product CPC code or with an explanation of what is the EPD,
- the EPD logo can be used on informative material reporting that the information are taken from EPD and using the EPD logo together with a registration number and with the website (www.environdec.com) for more information. It could be also useful the reference to the CPC code of the product or an explanation of what is the EPD.

In general, the organization is required to comply with all the requirements described in annex D of GPI. EUROCERT will check the above during periodic audits.

ARTICLE 16 - CONFIDENTIALITY

The information acquired by EUROCERT through the performance of its activities and related to validation of the EPD will be considered and treated as confidential and adhere to EUROCERT's Code of Ethics. EUROCERT ensures that all confidential information gathered during certification / verification activities is kept strictly confidential at all levels of its structure. No information will be disclosed to any third party unless in response to legal process or required by an accreditation body as part of the accreditation process or with written authorization from the Organization concerned.

The client's name, location, scope of certification and contact numbers may be entered into relevant directories. EUROCERT maintains its own directory of certified clients which is publicly available via the EUROCERT web site. This will show the status of any suspended cancelled or withdrawn Certificates.

EUROCERT will deal with the data that will be provided or to which it has access, in compliance with the EU regulation 2016/679, in electronic or paper form, for the sole purpose of fulfilling the requested service; the data controller is EUROCERT, at its registered office, to which the Organization may apply for the exercise of the rights referred to in the EU regulation 2016/679.

ARTICLE 17 – COMPLAINTS AND APPEALS

Written complaints may be filed with EUROCERT by its Certified Organizations (e.g. regarding staff behavior) or by Customers of Certified Organizations, Accreditation Bodies, other interested parties, etc.

The Organization may appeal against the decisions taken by EUROCERT, explaining the reasons for its dissent, within 30 days of the date of notification of the decision. EUROCERT will examine the appeal within two months of its presentation, possibly also consulting the organization's representatives.

ANNEX 1 –EPD LOGO

For more details please be informed at the following link:

https://www.environdec.com/The-International-EPD-System/EPD-Logotype/