SPECIAL RULES FOR THE VERIFICATION AND VALIDATION OF ENVIRONMENTAL PRODUCT DECLARATIONS

Valid from 2022-08-08

Italia

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1. Purpose and effective date of this document

The purpose of this document is to supplement the RGSG for Product Certification (RPRD) adopted by TÜV Italia Srl (hereinafter referred to as TÜV Italia) for product certification activities in accordance with UNI CEI EN ISO/IEC 17065:2012 in order to specify some special rules applicable to the verification of Environmental Product Declarations drawn up according to ISO 14025 within the framework of the "EPD® International System" Programme.

2. Field of application

These rules apply to activities to verify Environmental Product Declarations within the framework of the International EPD System® under ACCREDIA accreditation.
Il The International EPD System® is a system for the communication of Environmental Product Declarations according to ISO 14025. The operator of the system is EPD International AB, part of the Swedish Environmental Management Council. The general requirements of the EPD system are defined in the document "General Programme Instructions for the International EPD System" (GPI).
The EPD System allows organisations to use the EPD® mark on their products provided that they make available to the public on the portal www.environdec.com an Environmental Declaration verified by a Verification Body or issued by the Organisation itself after obtaining EPD process certification, also issued by a Verification Body.
ACCREDIA is the body in Italy recognised by EPD International to issue accreditation to Verification Bodies intending to operate in the field of EPD audits.
TÜV Italia applies these rules impartially and in exactly the same way, for all organisations utilising its certification services; in particular, no financial conditions or other undue conditions are ever imposed; access to verification activities is not conditional on the size of the organisation or its membership of a particular associational group, nor on the number of previously certified organisations.
It does not prejudice the application of any other regulations on additional certification schemes for which the organisation may be certified by TÜV Italia and/or by other Certification Bodies.

3. Terms and definitions

The terminology used in these regulations corresponds to the following standards:

- General Programme Instructions for the International EPD® System
- UNI EN ISO 14040:2021 Life cycle assessment - Principles and framework
- UNI EN ISO 14044:2021 Life cycle assessment - Requirements and guidelines
- Accredia's Informative Circular N.27/2022 - Dispositions on accreditation process for EPD International and EPD Italy schemes
- UNI EN ISO 14025:2010 Type III environmental statements. Principles and procedures

In particular, reference is made to the following terms and definitions:

LCA: Life Cycle Assessment - Compilation and evaluation throughout the life cycle of the input and output, as well as the potential environmental impacts, of a product system.

PCR: Product Category Rule - Set of specific rules, requirements and guidelines for the development of Type III environmental declarations for one or more product categories.

CPC: Central Product Classification - an international coding system used by the United Nations (UN) to classify products

Product category: Grouping of CPC codes as per Annex 1 to ACCREDIA Circular 16/2015

EPD: Environmental Product Declaration Type III - declaration providing quantified environmental data using pre-established parameters and, where relevant, additional environmental information

EPD Process: set of activities within an organisation that are managed in a systematic and methodical way with the ultimate aim of producing an Environmental Product Declaration

EPD GPI: EPG General Programme Instructions of the EPD® International System.

In addition, general information on the type of findings recorded and how they are managed is given below.

	Within 15 calendar days EPD Owner → Auditor		**Within 90 calendar days** EPD Owner → Auditor		**Within 120 calendar days** Certification body/Auditor → EPD Owner	
Major nonconformity (MaNC)	**Product EPD**	**Process EPD**	**Product EPD**	**Process EPD**	**Product EPD**	**Process EPD**
	• Formulation of correction intentions	• Analysis of causes • Formulation of correction intentions • Formulation of proposals for corrective actions	• Adoption of corrections • Submission of relevant evidence / revised documents	• Adoption of corrections • Implementation of corrective actions consistent with root cause analysis • Submission of relevant evidence / revised documents	• Conducting an on-site or off-site post-audit (depending on the nature of the NC) to confirm the effectiveness of the corrections made	• Conducting an on-site or off-site post-audit (depending on the nature of the NC) to confirm the effectiveness of the corrections made and the corrective actions adopted
Minor nonconformity (MiNC)	**Process EPD**		**Process EPD**		**Process EPD**	
	• Analysis of causes • Formulation of correction intentions • Formulation of proposals for corrective actions		- *No evidence shall be sent: the assessment of the actual adoption of corrections and corrective actions will be verified during the first subsequent surveillance audit.*		- *Post-audit activity not applicable: the assessment of the actual adoption of corrections and corrective actions will be verified during the first subsequent surveillance audit.*	

Comments / Opportunities for improvement (COM)

- Aspects that could lead to an improvement of the EPD with respect to a requirement of the applicable standards.
- A basic condition for identifying and recording opportunities for improvement is that the requirements of the standards with regard to the process element have been met, but that there are still areas for potential improvement.
- Adoption by the organisation is recommended.

4. Responsibilities

These rules set out in detail the responsibilities that the organisation and TÜV Italia are required to fulfil during the course of the contract pertaining to the certification activities.
The client organisations of TÜV Italia may create a link to the homepage of the TÜV Italia website which is www.tuv.it

5. Control of the rules

These rules are available to interested parties at www.tuv.it.
Organisations may request a copy in printed format.
The contents of section 5 of the RPRD also apply.

6. Verification process

6.1 General information

The Rules define the specific and/or substitute procedures defined by TÜV Italia, for EPD verification in accordance with the contents of section 8 of the RPRD.

6.2 Type of EPD Verification

Three main EPD verifications are possible:

Type of EPD audit	Description
Product EPD pre-certification	EPD audit process developed without reference PCRs (because absent or expired)
Product EPD verification	Standard EPD audit process (external audit), possible in case of EPDs written on the basis of valid PCRs
EPD Process Certification	Verification process of the management system related to data collection and subsequent processing of LCA studies as well as on the internal process within the organisation of creating and reviewing EPDs

Three types of product EPDs are also allowed for verification and certification:

- *Full EPD:* including all impact categories
- *"single issue/use" EPD:* focused on only one of the impact categories
- *sector EPD:* multiple information and involvement of many sites in the production process; the product to be labelled is produced at different sites; it is necessary to ensure that the procedures are introduced and applied at all sites. .Products covered in a sector EPD shall follow the same PCR and the same declared/functional unit shall be applied.
- *EPD of a product not yet on the market:* Products that are designed and planned but not yet launched on the market can be included in an EPD provided that the owner of the EPD has a registered and valid EPD for a similar product[1].
- *EPD of similar products:* similar products from a single or several manufacturing sites covered by the same PCR and manufactured by the same company with the same major steps in the core processes

[1] I Prodotti simili sono definiti come quelli provenienti da uno o più siti produttivi coperti dalla stessa PCR e fabbricati dalla stessa azienda con le stesse fasi principali dei processi core. Inoltre, un prodotto simile è definito prodotto fratello quando il suo modello LCA è uguale a quello del prodotto non ancora sul mercato in termini di composizione dei dati. Le uniche differenze possono riguardare i dati dell'attività (es. materiale o composizione degli imballaggi differente, un diverso consumo di energia nel processo produttivo, una diversa distanza di distribuzione).

may be included in the same EPD if none of the declared environmental performance indicators differ by more than 10% between any of the included products. The results for the environmental performance indicators can be referred to one representative product. The choice of the representative product shall be justified in the EPD.

6.3 Request for EPD Verification / Certification

The Organisation shall make available the document "TÜV ITALIA - EPD Verification - INFORMATION QUESTIONNAIRE" (form C01-EPD), with all parts compiled, attaching appropriate documentation where necessary.

Once the data have been obtained from the organisation, TÜV Italia will prepare the quote for the relevant verification / certification service with a description of the service offered, complete with all information relating to the activities and the prices determined on the basis of applicable rates.

Product EPD
The standard quote for Product EPD verification indicates the economic conditions for audit services over a five-year period:

- Verification
- Annual surveillance (4)

If allowed by the PCR, offers can be made which are consistent with EPD validity periods other than 5 years (e.g.: 3 years).

Process EPD
The standard quote for Process EPD certification indicates the economic conditions for audit services over a three-year period:

- Certification
- Annual surveillance (2)

6.4 Audit procedure and audit programme

The audit procedure is described in section 8.3 of the RPRD.

6.5 Verification / Certification process

The product EPD verification/process EPD certification process adopted by TÜV Italia comprises the following fundamental stages:

a. start of the verification / certification process;
b. Pre-audit (if any);
c. Stage 1 audit (review of documentation);
d. Stage 2 audit (or certification audit) which may also include possible follow-up audits or post-audits, to verify the corrective actions required during the initial audit;
e. periodic annual surveillance audits, which may also include possible follow-up audits or post-audits, to verify required corrective actions.

The purpose and method of conducting the above audits, as well as the classification of any findings, are detailed in the RPRD of which this appendix forms an integral part.

6.5.1 Start of the Verification/Certification process

The file is assigned to personnel in charge of carrying out the activities according to the operational procedures defined by TÜV Italia procedures.
The name of the personnel responsible for carrying out the audits at the organisation's premises shall be notified in good time. The organisation has the right to object in writing to the appointment(s) of Audit Team members, giving justified reasons.

A detailed audit plan is sent to the organisation well in advance of the date when the activities are to be carried out.

6.5.2 Pre-audit (if any)

At the specific request of the Organisation, it is possible to conduct a pre-audit, before proceeding with the actual certification process, in order to identify any criticalities with respect to the pre-requisites necessary to the certification process.

6.5.3 Stage 1 audit

Document examination, this may be conducted at TÜV Italy or at the client's site. It includes:

- an assessment of conformity to applicable requirements of the LCA study report describing the methodology used to calculate the performance of the products covered by the Declaration;
- an assessment of the documented procedures put in place by the organisation for acquiring, processing and updating the data used for the LCA, for reviewing the EPD and for identifying all significant changes in the data;
- the identification and confirmation of the reference PCR
- an assessment of the conformity of the LCA study to the reference PCR, and to the requirements of the GPI (latest version)
- a basic assessment of conformity to key environmental legislation impacting processes and products covered by EPDs
- verification of any other relevant procedures
- verification of the procedures applied to maintain EPD process certification (only for EPD process certification)
- the acquisition of information about the production sites from which the average data included in the sector EPD was obtained (only for the sector EPD)

The above documentation shall, where relevant, be made available by the organisation.

6.5.4 Stage 2 audit

As indicated by the GPIs, the EPD validation activities must be carried out on-site whenever the production processes are dominant as regards the overall environmental impact.

It is therefore established that, at least in the case of first verification and renewal and in any case whenever the production processes are dominant as regards the overall environmental impact, it is to be envisaged that the 2nd stage audit (validation stage) has a on-site timing not less than 20% of the total audit time.

This indication is to be considered generally valid also in the case of surveillance audits (where envisaged and applicable).

The breakdown of the "on-site", remote and "off-site" timing will be assessed on a case-by-case basis by TÜV Italia and appropriately communicated to the Organization through the planning office.

Any request for derogation must be duly motivated and agreed by TÜV Italia.

During this stage, the correct implementation of the methodology described in the LCA report and in the product system procedures is verified, collecting sufficient objective evidence on-site to allow the Audit Team Leader to express, with a reasonable level of assurance, an opinion on conformity to the applicable requirements of the EPD regulation.

The activity is carried out at least patially on-site (where the data is located and the processes covered by the Environmental Product Declaration are carried out) if the manufacturing processes are dominant regarding the overall environmental impact.

At the end of this stage, the Audit Team leader issues a report to the organisation with any findings, to be managed in accordance with these rules.

Stage 2 audit for *Process EPD*:

The verification must be carried out annually and concerns the EPD process and the internal insurance activity of the EPD process.

The verification of a Process EPD must always be carried out at the organization site where the "Process EPD" system operates. This verification follows the normal management system verification practice (eg ISO 14001, ISO 9001 or ISO 50001).

The Process EPD verification includes a sampling of the EPDs prepared by the organization and their compliance with the reference GPIs and PCRs. At least one sample check must be carried out for each year and for each product category.

If the Process EPD system includes several sites, the sampling shall be cover at least 1 site for each year of validity and for each product category included in the scope of the Process EPD.

The evaluation of a Process EPD must be able to ascertain that the Organization has the skills and capabilities to:

- conduct the prescribed LCA calculations according to the GPI and the PCR(s) as determined based on the scope of the process certification,
- develop EPDs according to the GPI and the PCR(s) as determined based on the scope of the process certification,
- have regular follow-up routines in place to accurately check the relevance of the current information in registered EPDs.

6.5.5 Issue of the Declaration of Validation

The contents of section 9 of the RPRD will apply.

The issue of the declaration of validation automatically implies that the organisation may use the declaration for the purpose of registering the EPD on https://portal.environdec.com/.

For this purpose it is necessary to identify "TÜV Italia s.r.l." and choose one of the names proposed among the inspectors authorized in the EPD verification portal (only TÜV Italia internal personnel are authorized to do so).

The "International EPD® System" logotype is a registered trademark and its use is limited to the EPDs registered within the program, as indicated and specified in the reference GPI. The Organization is required to know and comply with the conditions indicated in this document.

6.5.6 Periodic surveillance audits

EPD *Process Surveillance*:

periodic surveillance audits shall be carried out during the certificate validity period, to ensure that the system is maintained and that any problems identified during the initial audit have been resolved. The audit is annual.

The calculation of the duration of surveillance times is usually 1/3 of the total quoted for the first verification and certification activity.

EPD *Product Surveillance*:

Surveillance audits can be organised in two different ways.

The Client shall select the method, which shall be formalised in both the contract and the EPD:

a) Follow-up conducted internally by the Client for the duration of the EPD's validity. If this audit identifies a need to modify the EPD in force, the Client will be responsible for contacting TÜV Italia to plan and conduct a new audit.
b) Follow-ups carried out by TÜV Italia, as defined at contractual level, which may be conducted in two ways:
    - If no significant changes have occurred*, TÜV Italia will carry out document verification, the maximum duration of which may not exceed indications for stage 1 certification (see section 6.3.3).
    - if significant changes[2] have occurred that require an update to the EPD, TÜV Italia will conduct an audit, the maximum duration of which may not exceed indications for initial verification and validation activities (stage 1 + stage 2).

6.5.7 Renewal of certification

Renewal of process EPD and product EPD certification shall be carried out in accordance with the "Review Period", i.e. the period set by the Programme Operator for EPD registration validity: 5 years unless otherwise specified in the reference PCR.

If reference PCRs are reviewed, the client will have the following options:

a) Keeping the EPD valid until the end of the "Review Period" and updating the Declaration to the new version of the PCR during Renewal Verification; or
b) Updating the EPD according to the new PCR revision and applying for Early Renewal. In this case, TÜV Italia will issue a new Declaration of Validation with a new validity period.

The renewal procedure is the same as the initial certification procedure.

6.5.8 Changes to the certified system/product or process

[2] **Significant changes:** in case of significant changes affecting the environmental impact of the product (modification of products, processes, site, change of LCA databases, new product or service included in LCA/EPD), an additional audit must be carried out. In the case of changes leading to changes in impacts >+/-10%, a full update of the study and EPD will be required.

The organisation shall promptly notify TÜV Italia, in the case of a product EPD, of the following types of significant changes:

a) a change in the product resulting in an increase in environmental impacts, even in one category, of more than 10%;
b) a change in processes (within the organisation or a supplier), resulting in an increase in environmental impacts, even in one category, of more than 10%;
c) errors in the information declared;
d) significant changes to the information contained in the EPD regarding: the product, content of the declaration, further information on environmental social or economic impacts;

If the organisation owning the EPD chooses to change the EPD during its validity period, and when these changes have an impact on previously verified data, verification, as better described below, will be necessary:

1- if the new EPD is based on the same version of the PCR and GPI as the original Declaration, the verification will not change the validity of the Declaration;
2- if updated versions of the reference GPI or PCR are used, a new EPD Declaration of Validation, with a new validity period.

The organisation shall promptly notify TÜV Italia, in the case of a process EPD, of the following types of significant changes:

a) extension of the scope of the process EPD to new PCRs;
b) extension of the scope to new product areas not included in the CPC code ("two digit") declared in the certificate.

6.5.9 Unscheduled/supplementary audits

The contents of section 8.3.5 of RPRD will apply.

7. Referencing the certification - Use of the certificate and mark

The contents of section 13 of the RPRD will apply.
The use of a Certification Mark is not foreseen.

8. Suspension of certification

The contents of section 14 of the RPRD will apply.

9. Withdrawal/cancellation of the certification

The contents of section 14 of the RPRD will apply.

10. Management of claims and reports by client organisations and by interested parties

The contents of section 15 of the RPRD will apply.

11. Changes to the certification system rules

The contents of section 12 of the RPRD will apply.

12. Special requirements for organisations with an EPD already certified by another body

An organisation having one or more product EPDs or process EPDs certified by another certification body, accredited for the relevant CPCs, may also apply to TÜV Italia for certification.

The contents of section 18 of the RPRD will apply.

13. Confidentiality

The contents of section 19 of the RPRD will apply.

14. Complaints (or Appeals)

The contents of section 20 of the RPRD will apply.

15. Complaints against TÜV Italia

The contents of section 20 of the RPRD will apply.

16. Disputes

In the event of any dispute with TÜV Italia srl, the Court of Milan has jurisdiction.

17. Financial conditions

The contents of section 21 of the RPRD will apply.