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1. Purpose and entry into force

The purpose of this document is to supplement the General Regulation for Product Certifications (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 particular rules applicable to the verification activities of the Environmental Product Declarations drawn up according to ISO 14025 within the "EPD Italy" Program.

2. Scope

This regulation applies to the verification activities of environmental product declarations within the EPD Italy Program under ACCREDIA accreditation.

The EPD Italy Program is a program for the communication of Environmental Product Declarations according to ISO 14025. The operator of the program is ICMQ SpA. The general requirements of the EPD program are defined in the document "Regolamento del Programma EPDItaly" (Rules for the EPD Program).

The EPD Italy Program allows organizations to use the EPD Italy mark on their products provided that they publish the Environmental Declaration verified by an Accredited Verification Body, or issued by the Organization itself using a qualified LCA-TOOL/EPD-TOOL.

ACCREDIA is in Italy the body recognized by EPD Italy to issue accreditation to the Verification Bodies that intend to operate in the context of EPD Italy verifications.

This regulation is applied by TÜV Italia in a uniform and impartial manner for all organizations that use the certification services provided by TÜV Italia; in particular, no financial or other undue conditions shall be put in place; moreover, access to EPD Italy verification activities is not conditioned by the size of the organization or by membership in a particular association or group or even by the number of organizations already certified. It does not affect the applicability of other regulations concerning additional certification schemes for which the organization is certified by TÜV Italia and / or other Certification Bodies.

3. Terms and definitions

The terminology used in this Regulation shall be in accordance with the following documents and rules:

- Regolamento del Programma EPDItaly (Rules for the EPD Program)– last revision
- UNI EN ISO 14040:2021 Life cycle assessment – Principles and reference framework
- UNI EN ISO 14044:2021 Life Cycle Assessment – Requirements and guidelines
- UNI EN ISO 14025:2010 Type III environmental declarations. Principles and Procedures
- Accredia's Informative Circular N.27/2022 - Dispositions on accreditation process for EPD International and EPD Italy schemes

In particular, the following terms and definitions are referred to:

LCA: Life Cycle Assessment – Compilation and evaluation throughout the life cycle of the incoming and outgoing elements, as well as the potential environmental impacts, of a product system.

PCR: Product Category Rule – Product Category Rule is a set of rules, requirements and specific guidelines for the development of Type III environmental claims for one or more product categories.

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

Product Category: Grouping of CPC codes as per Annex 1 to ACCREDIA Circular no. 24/2017



EPD: Environmental Product Declaration Type III – statement providing quantified environmental data using predetermined parameters and, where relevant, additional environmental information

Validation: Action by which an independent third-party body ascertains the correctness of the data contained in the EPD.

Certification: Attestation of compliance with specified requirements.

Registration: Action by which EPDItaly identifies the EPD of the Organization requesting publication.

Publication: Action by which EPDItaly publishes the EPD of the requesting Organization.

Tool: Algorithm for calculating the environmental impacts of a product/service

LCA-TOOL: Verified and qualified calculation algorithm, which implements an LCA model (which eventually directly generates an EPD) for the determination of the environmental impacts of a product starting from a specific set of input data (LCA-TOOL).

EPD-TOOL: Verified and qualified calculation algorithm, which implements an LCA model that directly generates an EPD for the determination of the environmental impacts of a product from a predetermined database of input data (EPD-TOOL).

The following is also general information on the type of surveys subject to registration and on the relative management methods.

REGULATION PARTICULAR FOR THE VERIFICATION AND VALIDATION OF ENVIRONMENTAL PRODUCT DECLARATIONS EPD ITALY

Valid from 2022-05-02



Italia

| | Within 15 calendar days EPD Owner → Auditor | | Within 90 calendar days EPD Owner → Auditor | | Within 120 calendar days Certification body/Auditor → EPD Owner | |
|------------------------------------|--|--|--|---|--|--|
| | Product EPD | LCA-TOOL / EPD-TOOL | Product EPD | LCA-TOOL / EPD-TOOL | Product EPD | LCA-TOOL / EPD-TOOL |
| Major Non Conformity (NCMa) | <ul style="list-style-type: none"> Formulation of correction intentions | <ul style="list-style-type: none"> Root Cause analysis Formulation of correction intentions Formulation of proposals for corrective actions | <ul style="list-style-type: none"> Implementation of the treatment Submission of relevant evidence / revised documents | <ul style="list-style-type: none"> Implementation of the treatment Implementation of corrective actions in coherence with relative root cause analysis Submission of relevant evidence / revised documents | <ul style="list-style-type: none"> Conducting an on-site or off-site post-audit (depending on the nature of the NCs) in order to confirm the effectiveness of the corrections made | <ul style="list-style-type: none"> Conducting an on-site or off-site post-audit (depending on the nature of the NCs) in order to confirm the effectiveness of the corrections made and the corrective actions implemented |
| Minor Non Conformity (NCmi) | LCA-TOOL / EPD-TOOL | | LCA-TOOL / EPD-TOOL | | LCA-TOOL / EPD-TOOL | |
| | <ul style="list-style-type: none"> Root cause analysis Formulation of correction intentions Formulation of proposals for corrective actions | | <ul style="list-style-type: none"> <i>The corrective actions' evidences must not be sent: the assessment of the effective implementation of corrections and corrective actions will be verified as part of the first subsequent surveillance audit.</i> | | <ul style="list-style-type: none"> <i>Post-audit activities not applicable: the assessment of the effective implementation of corrections and corrective actions will be verified as part of the first subsequent surveillance audit.</i> | |

Comments / Opportunities for improvement (COM)

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



4. Responsibilities

This regulation describes in detail the responsibilities that the organization and TÜV Italia must fulfill during the contractual relationship relating to certification activities.

Please note that TÜV Italia's client organizations are authorized to create a link on the home page of the TÜV Italia website, whose address is <https://www.tuvsud.com/it-it>

5. Control of the Regulation

This special regulation is available to interested parties on the website <https://www.tuvsud.com/it-it>

In any case, organizations can request a copy.

In addition, what is reported in the RPRD General Regulations, par. 5, applies.

6. Verification Process

6.1 Generality

The Regulation defines the specific and/or substitute procedures, defined by TÜV Italia, for the EPD Italy Verification with respect to what is defined and described in paragraph 8 of the RPRD General Regulation.

6.2 Types of EPD Italy VERIFICATIONS

Three main EPD Italy checks are possible:

| Type of EPD verification | Description |
|---|--|
| EPD Preliminary Validation | EPD verification process developed without reference PCR |
| Product EPD Verification | Standard EPD verification process (external verification), possible in the case of EPDs drawn up on the basis of valid PCRs, for example: (a) a declaration relating to a specific product by a specific producer; (b) a statement of the average production of a product carried out in different installations by a specific producer; (c) declaration of the average product between different products in a specific installation by a specific producer; (d) a declaration of the average product between different products in different installations by a specific producer; |
| Sector EPD Verification | Standard EPD verification process (external verification), possible in the case of EPDs drawn up on the basis of valid PCRs, for example: (a) a declaration of the production of a specific product, as an average of the production carried out in different installations, by different producers; (b) a statement of the production of an average product, as an average of the production of different products carried out in different installations, by different producers; |
| Product or Sector EPD based on a qualified Tool | Verification process of EPDs that are generated from a specific calculation algorithm/TOOL |



6.3 Verification Request or Qualification for EPD Italy

The Organization must make available the document "TÜV ITALIA – Verification EPD Italy - INFORMATION QUESTIONNAIRE" (mod. C01-EPD Italy-e) completed in all its parts, attaching appropriate documentation where necessary.

Once the data has been obtained from the organization, TÜV Italia prepares the offer for the relevant verification / qualification service with the description of the service offered completed with all the information relating to the activities and the prices determined according to the rates in force.

Product / Sector EPD Italy

The Product / Sector EPD Italy verification offer shows the economic conditions relating to the EPD Italy Product or Sector verification service aimed at publishing the EPD Declaration on the EPD Italy portal (validity period 5 years).

Qualification of LCA-TOOL or EPD-TOOL

The standard certification offer for LCA-TOOL or EPD-TOOL Qualification shows the economic conditions related to audit services (duration 5 years).

6.4 Audit procedures and audit programme

The procedures for carrying out the audit are described in paragraph 8.3 of the RPRD General Regulation.

6.5 Verification / Qualification process

The process of the product EPD verification / TOOLS' qualification by TÜV Italia is divided into the following fundamental phases:

- a. start of the verification / qualification process;
- b. *possible* preliminary visit (pre-audit);
- c. stage 1 audit (examination of documentation);
- d. stage 2 audit which may also include any subsequent audit or post-audit, for the verification of the corrective actions required during the initial verification;

The purpose and methods of carrying out the audits listed above, as well as the classification of any findings, are detailed in the General R-PRD Regulation of which this appendix is an integral part.

6.5.1 Start of the Verification / Qualification process

The file is assigned to the personnel in charge of performing the activities according to the operating procedures defined by the TÜV Italia procedures.

The name of the personnel in charge of carrying out the checks at the organization is communicated in advance. The organization has the right to object (in writing and adequately motivated) on the members of the Verification Group.

A detailed audit plan is sent to the organization in advance respect of the date of execution of the activities.



6.5.2 Possible preliminary visit (pre-audit)

At the specific request of the Organization it is possible, before proceeding with the start of the actual certification process, to carry out a pre-audit activity with the aim of identifying any critical issues with respect to the pre-requisites necessary for the start of the verification or qualification process.

6.5.3 Verifying a Product or Sector EPD

Stage 1 Audit

Documental examination, normally conducted off-site. It includes:

- the assessment of compliance with the applicable requirements of the LCA study report describing the methodology used for the calculation of the performance of the products covered by the EPD;
- the evaluation of the documented procedures prepared by the organization for the purpose of acquiring, processing and updating the data used for the LCA, for the revision of the EPD and for the identification of all significant data changes;
- identification and confirmation of the reference PCR
- assessment of the conformity of the LCA study with the reference PCR as well as with the requirements of the EPDItaly Regulation (last version)
- verification of any other relevant procedure
- the acquisition of information about the production sites from which the average data included in the sector EPD were obtained (only for the sector EPD)

The documentation referred to above shall, where relevant, be made available by the Organization.

Stage 2 audit

According to the provisions of the EPDItaly Program Regulations, the first verification and EPD renewal activities must be carried out on-site.

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 Italy and appropriately communicated to the Organization through the planning office.

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

Stage 2 audit includes verification of processes and data. In this phase, the correct implementation of the methodology described in the LCA report and in the procedures of the product system is verified, collecting sufficient objective evidence on-site to express, with a reasonable level of guarantee, an opinion regarding compliance with the applicable requirements provided for in the EPD Italy Regulation.

Verification of data from LCAs, LCIs and information forms, as well as additional environmental information shall confirm the following:

- compliance with PCR;
- compliance with the ISO 14040 series of standards;



- compliance with the general program instructions for the Type III environmental declaration;
- that the evaluation of the data includes coverage, accuracy, completeness, representativeness, consistency, reproducibility, sources and uncertainty;
- plausibility, quality and accuracy of LCA-based data;
- quality and accuracy of additional environmental information;
- quality and accuracy of supporting information.

The activity is carried out (at least in part) in the sites of the organization where the data are located and the processes covered by the Environmental Product Declaration are carried out.

At the end of this phase, Lead Auditor issues to the organization a report with any findings that have emerged, to be managed in accordance with what is indicated in this regulation.

Verification of legislative compliance

For the purposes of validating the EPD according to the EPD Italy rules, it is not mandatory to perform a verification of the legislative compliance of the production site (s) relating to the EPD. The responsibility for ensuring legislative compliance is in charge of the customer organization, which can make one of the following alternative choices:

1. Request a verification of legislative compliance by TÜV Italia. It will be quoted separately and conducted by TÜV Italia through a specific on-site verification activity to check the compliance of the product subject to EPD with environmental legislation (before or during Stage 1);
2. Provide TÜV Italia with a valid copy of the Certificate of its Environmental Management System (ISO 14001 or EMAS);
3. Draw up a self-declaration of product legislative compliance (on a format prepared by TÜV Italia) on the Organization's headed paper and signed by its legal representative indicating at least:
 - that the product/service covered by the EPD complies with all the provisions of the law on the environment;
 - that the product/service covered by the EPD has not been, or is not currently, or is not known to be close to the initiation of legal proceedings, relating to and/or attributable to compliance with environmental legislation.

Issuance of the Validation Declaration

The provisions of § 9 of the RPRD General Regulations apply.

The issuance of the validation declaration automatically entails permission for the organization to use it for the purpose of registering the EPD Italy Declaration on www.epditaly.it

The "EPDItaly" logotype is a registered trademark and its use is regulated within the EPDItaly Regulation. The Organization is required to know and comply with the conditions indicated in this document.

6.5.4 Maintenance

During the period of validity of the certificate, the organization is required to annually monitor the data and information used in the LCA Study in order to verify the extent of the variations in the declared environmental performance.

In the event that no significant changes have occurred, the organization is required to submit a declaration to TÜV Italia.



In the event of changes in the environmental performance of the product covered by the EPD greater than $\pm 10\%$, the declaration will be re-evaluated in the manner described in the EPDItaly Program's Regulation. TÜV Italia will decide to grant the validation of the new EPD which must be accompanied by a validation certificate that will also show the date of updating of the EPD.

In case of:

- substantial product changes (materials, dimensions, etc.) with potential variation of the validated EPD;
- substantial changes in the process (within the organization or a supplier) with potential variation of the validated EPD;
- any other change that results in a variation of more than 10% in the environmental performance of the product;

TÜV Italia will have to revalidate the EPD.

6.5.5 Reduction/Extension

In case of:

- reduction of the object of the EPD;
- extension of the EPD to other products;
- change in the number of installations from which data are collected;
- reduction/extension of the modules of the considered life cycle;
- other factors that can modify the previous validated EPD;

the environmental statement must be modified and will be re-evaluated in the manner described in the EPDItaly Regulation.

TÜV Italia will decide to grant the validation of the new EPD which will be accompanied by a validation certificate that will also show the date of update of the new EPD.

6.5.6 Renewal of validation

As specified in the EPDItaly Regulation, an EPD remains valid, after verification, for a period of five years beyond which it must be subject to review and verification, as indicated in the Regulation itself.

TÜV Italia will decide to grant the validation of the new EPD which will be accompanied by a validation certificate that will also show the date of update of the new EPD.

6.5.7 Use of an LCA-TOOL: qualification of the Tool and validation of the EPDs generated

How to qualify an LCA-Tool

No tool should be used without verification. EPDs generated by unverified tools are not considered EPDs. The tool should not be modified after verification. Any changes made to the tool may result in a new verification. The owner of the tool must keep track of any changes and make it available to TÜV Italia. Each tool is valid for a specific PCR or group of PCRs.

Before starting the actual verification process, the Organization can request a pre-audit of the Tool. If the information acquired during the offer phase makes it advisable, the pre-audit of the Tool can also be proposed by TÜV Italia.

The main stages of the qualification of a tool are as follows:

- (a) Preparation of the audit;



- b) Qualification of the LCA-TOOL;
- c) Validation of the first EPD generated by the use of qualified LCA-TOOL (initial evaluation);
- d) Verification of the correct application of the processes of use of the LCA-TOOL;
- e) Verification of the legislative compliance of the Organization using the LCA-TOOL;
- f) Validation of the EPDs generated by the LCA-TOOL at a later stage than the initial assessment;
- g) Annual maintenance of the EPDs generated by the LCA-TOOL;
- h) Renewal of the EPDs generated by the LCA-TOOL.

The methods of conducting the activities mentioned above follow what is indicated in Annex 3 of the EPD Italy Regulation.

Duration of the LCA-TOOL Qualification

The qualification of the LCA-TOOL, without any changes, will last 5 years, at the end of which the LCA-TOOL must be verified again. At the successful conclusion of the qualification process, a certificate of qualification will be issued for the specific LCA-TOOL, which will show the date of issue and the relative expiry date (5 years from the date of issue).

Any changes to the tool (e.g. to the LCA model) after verification of the tool will result in a new version of the LCA-tool.

The organization that owns the qualified LCA-TOOL is required to communicate annually to TÜV Italia any changes that have occurred relating to the elements that define the scope of the LCA-TOOL, the calculation model (LCA) implemented, and other elements that impact on the LCA study. In the presence of variations on these aspects, the LCA-TOOL must be retrained.

Specific requirements for EPD validation

The following two cases are distinguished:

1. First EPD generated through the use of qualified LCA-TOOL;
2. EPD subsequent to the first generated by the use of qualified LCA-TOOL;

First EPD generated using qualified LCA-TOOL

The activities for the validation of the first EPD produced by qualified TOOL follow what is specified in par. 6.5.3. The validation activity of the first EPD issued by the tool will include an audit on the site of collection, management and processing of data for the development of the EPD and an inspection at the manufacturer's plant to verify the consistency of the production process implemented by the tool.

The activity must be carried out for each new EPD that has elements of the scope of the LCA-TOOL different from those contained in previously validated EPDs (e.g. different types of product, life cycle modules, production units).

At the end of the verification and validation activities of the EPD, TÜV Italia will issue a specific validation certificate.

EPD subsequent to the first, generated through the use of by the qualified LCA-TOOL

Since the LCA model has been verified previously, EPDs can be verified with an optimized procedure, without further verification on the LCA model.

TÜV Italia shall verify each EPD issued by the Organization, in terms of correct setting of the EPD according to the format defined by the Program Operator and consistency of the input data.



The control on the consistency of the data can be done with the help of a plausibility check prepared by the Organization and / or with a control of the data that are most significant at the choice of the verifier (eg mass balance, difference with the primary past data, difference with past impacts, etc.).
The methods of conducting the activities mentioned above follow what is indicated in Annex 3 of the EPD Italy Regulation.

6.5.8 Use of an EPD-TOOL: qualification of the Tool and validation of the EPD generated

No tool should be used without verification. EPDs generated by unverified tools are not considered EPDs. The tool should not be modified after verification. Any changes made to the tool may result in a new verification. The owner of the tool must keep track of any changes and make it available to TÜV Italia. Each tool is valid for a specific PCR or group of PCRs.

In the case of EPDs generated by EPD-TOOL since the user of the EPD-TOOL has the only possibility to choose the different configurations of the components of the product object of the EPD, and the EPDs are integrated into a control system, these are not verified punctually, neither during the evaluation phase, nor in surveillance.

TÜV Italia will verify the EPDs, in a simplified way, on a sample basis on all those issued and published.

However, a certificate of validation of all EPDs that can be produced by the qualified EPD-tool is issued, headed to the EPD owner (if verified during the initial qualification phase).

This certificate, lasting two years, is subject to annual surveillance, through surveillance of a sample of EPDs, and renewal, through verification of the tool, as indicated in paragraph 6.5.4, and of the methods of training / control by the EPD owner towards the user.

If the tool changes or should be subject to revision, the EPDs will be issued referring to an EPD-tool different from the first.

The verification of the EPD produced by TOOL and integrated into a control system, will be conducted by TÜV Italia, in the following way:

- (a) Preparation of the audit;
- b) Qualification of the EPD-TOOL;
- c) Validation of a representative sample of EPDs that can be generated by EPD-TOOL (initial evaluation);
- d) Verification of the correct training for EPD-TOOL users;
- e) Verification of the legislative compliance of the EPD-owner;
- f) Annual maintenance of the EPD-TOOL;

The methods of conducting the activities mentioned above follow what is indicated in Annex 4 of the EPD Italy Regulation.

6.5.9 Unplanned/additional audits

This applies as described in paragraph 8.3.5 of the RPRD General Regulation.

7. Methods of reference to validation, use of the certificate and the mark

What is described in the RPRD General Regulations, par. 13, applies.
The use of a Certification Mark is not envisaged.



8. Suspension of validation

The provisions of paragraph 14 of the RPRD General Regulation apply.

9. Withdraw/cancel validation

The provisions of paragraph 14 of the RPRD General Regulation apply.

10. Handling of complaints and reports by client organizations and stakeholders

The provisions of paragraph 15 of the RPRD General Regulation apply.

11. Changes to the rules of the certification system

The provisions of paragraph 12 of the RPRD General Regulation apply.

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

An organization having one or more product EPDs or one or more TOOL qualified by another certification body, accredited for the relevant CPCs, may also apply for certification from TÜV Italia.

The provisions of paragraph 18 of the RPRD General Regulation apply.

13. Confidentiality

The provisions of paragraph 19 of the RPRD General Regulations apply.

14. Appeals

What is described in paragraph 20 of the RPRD General Regulation applies.

15. Complaints against TÜV Italia

What is described in paragraph 20 of the RPRD General Regulation applies.

16. Contentious

If a dispute is initiated with TÜV Italia srl, the competent court is at Milan.

17. Economic conditions

The provisions of paragraph 21 of the RPRD General Regulation apply.