RULE FOR THE VALIDATION OF THE

ENVIRONMENTAL PRODUCT DECLARATION

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Technical Regulations

CONTENTS

ATTACHMENTS

CHAPTER 1 - INTRODUCTION

1.1

This Rule defines the procedures applied by RINA 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.

1.2

The terminology used in this document complies with that used in the following standards: ISO 14001, ISO 14020, ISO 14025, ISO 14031, ISO 14040, ISO 14044, ISO 14050, EPD International AB document "General Programme Instructions for the International EPD System", EPD International AB 2.01 or 2.5, in the following, GPI 2.01 or 2.5[1].

CHAPTER 2 - DEFINITIONS

2.1

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

2.2

ENVIRONMENTAL PERFORMANCE: the results of an Organisation's management of its environmental concerns.

2.3

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 2.01 or 2.5 document, chapter 3.

2.4

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.

2.5

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

2.6

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.

2.7

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

CHAPTER 3 - GENERAL

3.1

The term product means any goods or services, regardless of their use or position in the production cycle.

RINA bases its EPD validation 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 similar raw materials and similar production processes.

Similar products with differences between the mandatory impact indicators lower than +-10% may be presented using the impacts of a representative product. In case of application of GPI version 2.01, the differences are +- 5%. .

Similar products with differences between the mandatory impact indicators higher than +-10% may be presented in the same declaration documents but using separate columns in the tables or separate tables so that the differences are clearly stated. In case of application of GPI version 2.01, the differences are +- 5%.

3.2

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

[1] Issued by the EPD International AB. Available from the site www.environdec.com.

3.3

In the sphere of application of this Rule, RINA does not provide Organisations with consulting services for drawing up their LCA and/or writing the EPD, or for preparing related documents.

3.4

The validation system foreseen in this Rule 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 Rules (hereinafter known as PCR), the GPI 2.01 or 2.5 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 2.01 or 2.5 document of the EPD International AB and with ISO 14025 for the purposes of issuing validation.

An Environmental Product Declaration is certified on the basis of the two procedures described below.[2]

3.5

EPD VALIDATION: this may be requested by an Organisation 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 2.01 or 2.5 document of the EPD International AB.

EPD validation envisages subsequent surveillance activities, generally performed at annual intervals, in order to ensure that the conditions which allowed validation to be issued in the first place still exist.

3.6

EPD PRE-CERTIFICATION (see Chap. 9): an Organisation may ask RINA 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 Organisation may ask RINA to validate its pre-certified EPD, as described in section § 3.5.

The validation activities performed by RINA are more or less similar to pre-certification activities and are described in chapter 4.

RINA 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 2.01 or 2.5 document of the EPD International AB.

Therefore, the pre-certification control methods can differ from the general validation 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 chapter 9 of this Rule.

3.7

The body guaranteeing the certificates issued by RINA (Accreditation Body) may require its observers to take part in the audits performed by RINA of organisations. The participation of these observers is agreed in advance between RINA and the organisation.

If the organisation 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 use of relative logo is not granted.

CHAPTER 4 – PROCEDURE FOR VALIDATING OR PRE-CERTIFYING THE ENVIRONMENTAL PRODUCT DECLARATION

4.1

Organisations wishing to obtain validation or pre-certification of their EPD must provide RINA with the data relative to their organisation/production and the location of the site/s where the object concerned by the EPD validation is made by sending the “Informative Questionnaire”, (available upon request) which RINA will use to make its offer. This form should include 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 validation request;
- indication of the PCR identifying the product concerned by the EPD;
- type and number of EPD involved in pre-certification/validation (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).

On receipt of the informative questionnaire filled in, RINA performs an initial evaluation in order to prepare an offer:
verification of any points of the informative questionnaire not filled in or to be clarified with the client;

[2] Applies to Sector EPD, Single issue EPD and Full EPD but not to EPD Process Certification. For the latter, certification of the system of creation and internal validation of EPD is foreseen.

verification of the scope of the certification with reference to RINA 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 validation;
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 validation transfer;
verification of the existence of the resources and competences needed to perform the verifications in the time scheduled.

4.2

Organisations must formalise their request by sending RINA an "EPD validation request" form or an "EPD pre-certification request" form (available upon request) in which the product concerned by the EPD must be defined.

On receipt of the request form and the relative annexes, and after a preliminary review to check they are complete, RINA will inform the Organisation of its acceptance of the request in writing.

The request of the Organisation and the relative acceptance by RINA contractually formalise the actions performed by RINA according to this Rule.

RINA selects the technicians for the document evaluation and informs them of this task.

RINA notifies the Organisation of the names of the auditors responsible for the assessment; the Organisation may object to the appointment of the members of the audit team, giving its reasons.

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

(a) copy of the EPD concerned by the validation 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 is to be sent or, 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);
(b) copy or brief report of the LCA relative to the product concerned by the EPD;
(c) copy of the reference PCR (for EPD validation) approved and registered by the Competent Body;
(d) internal procedures 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;
(e) procedures 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);
(f) list of procedures implemented to maintain EPD process certification (only for EPD process certification);
(g) list of EPD subject to internal validation from which RINA can select 1/3 of the EPD for spot checks to ensure they comply with the new EPD rules (only for EPD process certification);
(h) list of production sites from which the average data, included in the Sector EPD, have been obtained (only for Sector EPD)

RINA 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 2.01 or 2.5 document of the EPD International AB, ISO 14025, the ISO 14040 and ISO 14044 series of standards and this Rule.

RINA sends the technicians the information needed to perform the verification activities.

4.3

RINA will review the documentation listed in paragraph 4.2 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 Organisation to RINA's satisfaction before the validation procedure can continue.

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

While in the case of EPD process certification, non-conformities can be major, minor 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 rules for the product;
  - non compliance with one or more requirements of the RINA Rules for EPD validation;
  - 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, a major non-conformity means:

- 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 rules for the product of the sampled EPDs;

  - non compliance with one or more requirements of the RINA Rules for EPD validation;

  - 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 sampled EPD;

  - a serious deficiency within the EPD creation and emission system.

  For EPD process certification, a minor non-conformity means:

- a temporary and non systematic lapse in the EPD creation and emission system.

Recommendation means:

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

The documents referred to in 4.2 will be kept and filed by RINA.

Generally speaking, the documents review should check that:

– the EPD document and the LCA study are in compliance with the requirements of the GPI 2.01 or 2.5 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 organisation not certified ISO 14001 and/or EMAS).

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

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

- 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'll be verified that the data are presented in conformity with what is foreseen in paragraphs 5.5.1 and 5.7.1 of the GPI 2.01 or paragraphs 5.2.1 and 5.3.1 of GPI 2.5.

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 validation will be agreed together with the applicant.

4.4

Following agreement with the Organisation, a preliminary audit of the site may be made to check the general state of application of the EPD.

4.5

RINA appoints the members of the audit team for the on-site visit and sends them the information needed to perform the verification activities. On the basis of the information received, the audit plan is prepared and sent to the Organization, together with the communication of the audit team. The Organization can object to the appointment of the members of the evaluation group justifying its reasons.

The onsite audit visit is performed on the basis of the documentation indicated in point 4.2 and will mainly be aimed at ascertaining 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 Organisation, 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 RINA auditors and will comprise the following main points:

– an initial meeting with the Organisation's technicians to agree on the aims and methods of the visit;
– an inspection of the production site(s) where the product considered in the EPD is produced (1/3 of the production sites where the total number makes it possible, if there is no reference site where all the data collected from the other production sites have been gathered, only for Sector EPD. If the number of production sites is too high, the

sampling methods indicated in par. 5.7.4 or 5.3.4 of the GPI 2.01 or 2.5 will be applied);
- 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 organisations not ISO 14001 and/or EMAS certified;
- a final meeting to illustrate the outcome of the audit.

During the visit, the Organisation must demonstrate the practical application of the procedures presented and the correctness of the information contained in the EPD.

4.6

At the end of the audit visit the Organisation will be given an audit report indicating, among other things, any non-conformities found and observations made.

The Organisation may make any reserves or observations concerning the non-conformities or findings made by the RINA auditors on the relative space in the audit report.

After analysing the reasons for any non-conformities indicated in the above report, the Organisation must inform RINA of its proposals for corrective action and the date envisaged for its implementation. RINA will communicate its acceptance of the above proposals to the Organisation.

For the validation 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 Team Leader of the audit team.

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

4.7

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 organisation so that the validation/pre-certification process can continue.

4.8

The validation process is suspended if non-conformities with the reference standard are found.

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 validation process is resumed.

If the above deadline is exceeded, the LCA and the EPD will be totally reviewed within 12 months from the date of the finding.

If this 12 month period expires and the audit has not been successfully concluded, RINA reserves the right to terminate the validation process and charge the time and money spent up until that moment. In these cases, if the Organisation wishes to continue with RINA certification, it must repeat the whole procedure by presenting a new application.

In special cases and at its discretion, RINA may vary the above deadlines following a motivated request by the Organisation.

4.9

Following the positive outcome of the closure of the findings issued during the audit, the EPD document will be sent for approval to the independent technical reviewers.

The reviewers can request changes to the EPD document that the organization is required to take into account for the positive conclusion of the validation process.

Following the successful outcome of the findings, RINA will validate the EPD by signing the Declaration after each page has been identified and by indicating, where applicable, the ACCREDIA accreditation number. A verification statement, related to conformity of the product/service with the reference rule, is issued together with the validated EPD.

Further certificates may be issued as a result of national or international agreements between RINA and other Certification Bodies for the purposes of the mutual recognition of EPD validation.

In the case of a decision not to issue the validation, RINA 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 validation process.

4.10

Following validation or pre-certification of the EPD by RINA, the Organisation will directly request the Competent Body to register it and then publish it on its internet site.

CHAPTER 5 – EPD RENEWAL

5.1

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 three years; RINA establishes its duration by consulting the Organisation 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 2.01 or 2.5 document of the EPD International AB.

5.2

Approximately three months before the date of expiry, the Organisation must declare whether or not it intends to renew its EPD validation; it must follow the procedures described in chapter 4 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 RINA in all cases:

a) the definitive and updated LCA report;
b) a copy of the new EPD to validate;
c) the procedures established to assess compliance with the environmental legislation applicable to the product and pertinent production processes (only in the case of organisations not ISO 14001 and/or EMAS certified).

5.3

EPD validation will be renewed following the positive outcome of the review of the product LCA study and the EPD and an audit visit which is generally performed using the same criteria as the initial validation 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.

5.4

Following the positive outcome of the documents review considered in point 5.3 a new audit visit will be made to the production site, using the same criteria indicated in point 4.5, 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 Organisation 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 organisations not ISO 14001 and/or EMAS certified.

5.5

In particular cases and, in any case, at RINA'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 as per para. 4.5.

5.6

The frequency of the renewal audits will be established by RINA on a case-by-case basis, according to the contents of point 5.1, and may be modified by RINA depending on the audit results.

Audit dates will be agreed, together with the Organisation, with sufficient notice and will be officially confirmed at least one week before the audits take place.

5.7

RINA will notify the Organisation in writing of unsuccessful periodic validation 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.

5.8

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

- the organisation interested in obtaining recognition of validation by RINA must have sent the questionnaire for the preparation of the economic offer for the transfer;
- validation of the Organisation is issued by a Body accredited for EPD by an agency or an EPD verifier recognised by the EPD International AB;
- the validation is valid;
- the certificate has not been suspended;
- the Certification Body has not been suspended;
- the product(s)/service(s) described in the EPD document fall within the accredited scope of RINA.

In particular, the Organisation must give RINA a copy of the validated EPD and fill in the Validation Request Form and the Informative Questionnaire, as indicated in chapter 4 of this Rule.

Where these conditions are met, EPD validation is transferred keeping the expiry of validity of the EPD provided by the previous Certification Body and with it the annual surveillance audits.

Organisations holding EPD validation not covered by the above accreditation and/or prerequisites will be treated as new clients, following the validation process described in chapter 4.

CHAPTER 6 – MAINTENANCE OF EPD REGISTRATION AND PERFORMANCE OF ANY SUPPLEMENTARY AUDITS

6.1

Maintenance of registration is subject to compliance with the conditions described in this Rule and with the reference standards indicated in point 3.4 above.

In particular, validity of the registration is dependent on the fact that the Organisation 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 RINA.

During the validity of the EPD, RINA periodically carries out surveillance checks to make sure that the requirements which led to the issue of validation in the first place continue to be complied with.

Surveillance is usually performed on a documental basis. If an organisation does not provide the necessary documental evidence requested by GVI to perform the assessment or if the organisation notifies RINA of relevant changes to the production process, an on-site audit of the organisation will be performed.

The periodic surveillance activities involving both document reviews and site audits are planned by RINA 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 Organisation must provide on request will be described in detail to the Organisation together with the communication that the EPD has been validated.

The methods of performing the surveillance audit, follow the ones foreseen for the validation. The only changes are constituted by verification of the rule in a documental manner 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, RINA 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.

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

If the Organisation has a valid Environmental Management System, certified by RINA 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

6.2

During the period of validity of the EPD registration, if significant changes 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 Organisation 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, even in just one category;

the Organisation undertakes to promptly inform RINA 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 2.01 or 2.5 document and, where applicable, in the reference PCR.

The Organisation 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 RINA.

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

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 the PCR is updated.

If a new EPD document is re-issued the differences versus the previous version of the EPD will have to be reported.

Depending on the type of modifications made, RINA 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 Organisation, in order to assess whether EPD registration can be maintained.

If registration cannot be maintained, RINA will inform the Organisation in writing of the need for a

new version of the revised EPD. Within two weeks of the date of the decision taken by RINA, the Organisation must inform RINA whether it intends to renounce registration or renew it according to what is stated in chapter 5.

RINA will inform the Organisation that validation has been withdrawn.

6.3

RINA also reserves the right to carry out supplementary audits, following reports sent to RINA by interested parties, which are considered to be particularly significant as regards non compliance with the criteria contained in the reference standard and/or this Rule.

6.4

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 RINA for review during the audit.

The Organisation 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 Organisation, and must make these records available to RINA.

During audits, RINA 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.

CHAPTER 7 - MODIFICATION OR RENUNCIATION OF EPD REGISTRATION

7.1

Organisations which intend to renounce the EPD must inform RINA, in writing, of their intention not to renew EPD registration or EPD process certification registration.

7.2

The Organisation may request a modification, extension or reduction of the field of application of the EPD by presenting a new validation request. RINA reserves the right to examine these requests on a case by case basis and decide the evaluation method for issuing new validation.

The changes communicated by the organization can be checked through supplementary audits that may be just documental or on site. In particular, in the case of changes to the production processes or to an increase in product groups, an on-site audit will be performed. The organization has 3 months to solve any NC issued as a result of these verifications. In the case of no reply by the above-mentioned deadline, the validity of the EPD will be suspended.

The outcome of these verifications is reviewed for approval by an independent technical reviewer for EPD. Following the positive conclusion, the EPD document is re-validated and re-issued. The Organization asks for republication on the EPD International AB website, substituting it for the previous one.

7.3

If the Organisation does not undertake the activities to maintain EPD validation (chapter 6 of this Rule) and therefore RINA is unable to carry out the surveillance activities, the procedure to withdraw validation will be started.

The Organisation will receive a letter informing them that the withdrawal procedure has been started and subsequently a letter of withdrawal of the validity of the validation.

Withdrawal of validation means the Organisation is no longer allowed to use the EPD logo or to advertise its product as having EPD validation.

7.4

RINA will transmit the information regarding the previous points to EPD International AB and to the accreditation body for their pertinent deliberation.

CHAPTER 8 – CONTENTS OF THE EPD

8.1

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.

8.2

The EPD must contain at least the following information:

(a) programme-related information as required by paragraph 4.1 or 4.2 of the GPI 2.01 or 2.5;
(b) Product-related information as required by paragraph 4.2 or 4.3 of the GPI 2.01 or 2.5;
(c) Environmental performance-related information as required by paragraph 4.4 or 4..5 of the GPI 2.01 or 2.5;
(d) Additional environmental information as required by paragraph 4.5 or 4.6 of the GPI 2.01 or 2.5;
(e) Mandatory statements as required by paragraph 4.6 or 4.7 of the GPI 2.01 or 2.5.

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.

8.3

The contents of the EPD must be examined by RINA. The Organisation must inform RINA of any changes or modifications made to the information contained in the validated EPD.

In no case may the Organisation modify the EPD without informing RINA.

CHAPTER 9 - PRE-CERTIFICATION

9.1

An Organisation 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 RINA to perform pre-certification pursuant to the EPD International AB GPI 2.01 or 2.5 document, par. 3.7.

The main aims of pre-certification are:

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

9.2

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

9.3

If the Organisation 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) in order to obtain pre-certification, the Organisation may produce a simplified LCA, as indicated in the EPD International AB GPI 2.01 or 2.5 document, par. 3.7;
c) the Organisation must take the action required to inform and involve the parties interested in developing the reference PCR.

9.4

The period of pre-certification validity is agreed between RINA and the Organisation and may not last more than a year.

The reporting format for a pre-certified EPD will have to have the lay-out required by the GPI 2.01 or 2.5.

In addition, the pre-certification will have to report the information required in paragraph 4.7 or 4.8 of the GPI 2.01 or 2.5 respectively.

For any other points concerning pre-certification that have not been covered above, reference should be made to the contents of the EPD International AB GPI 2.01 or 2.5 document, par. 3.7.

CHAPTER 10 SINGLE ISSUE EPD

In the case of single issue EPD, it is necessary to send RINA the information as per point 4.2.
The single issue EPD is an Environmental Product Declaration focused on only one of the environmental impact categories 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 4.4 or 4.5 of the GPI 2.01 or 2.5 is available on request 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 4.6 or 4.7 of the GPI 2.01 or 2.5;
- information on how to obtain information on the complete environmental impact of the product declared;
- the declaration foreseen in paragraph 4.13 of GPI 2.5.

CHAPTER 11 EPD PROCESS CERTIFICATION

In the case of EPD process certification, it is necessary to send RINA the information as per point 4.2. From the list of EPD validated within the company, RINA will select through sampling, 1/3 of the EPD and will ask for the documentation concerning the LCA studies and the EPD documents of the products chosen to be sent to them. In this way, it will be possible to view all the EPD validated by EPD process certification within the three years of EPD system certification maintenance. Certification lasts three years, renewable on expiry of the third year.

The aim of the audit will not only be what is contained in point 4.5 for what concerns the sampled EPD but also to verify the correct and effective application of the procedures implemented by the organisation to maintain the internal validation process of the EPD produced according to point 5.8 or 5.4 and annex D of the EPD International AB GPI 2.01 and GPI 2.5 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.

CHAPTER 12 – SECTOR EPD

For Sector EPD validation, if there is no reference site where all the data collected from the other

production sites involved in the Sector EPD have been gathered, RINA 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 criterion adopted by ISO 14001: thus, every year, 1/3 of the total sites will be audited. If there are too many sites to apply this criterion, selection of the sample will be made according to the methods contained in the EPD International AB GPI 2.01 or 2.5 document, par. 5.7.4. or 5.3.4 respectively.

CHAPTER 13 - ADVERTISING – USE OF THE EPD REGISTRATION LOGOTYPE

The way in which the EPD, relative logotype (see facsimile in annex 2) and information label are to be used is regulated by a specific agreement between the Organisation 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 Organisation 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 validation and others;
- the Organisation 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 (ref.: ISO 14024) is prohibited;
- the EPD logo can be used on the products for which the EPD as been realized, on their package provided in association with the website: "**www.environdec.com**, registration number and possibly with the corresponding product CPC code.

In general, the organisation is required to comply with all the requirements described in annex E of the GPI 2.01 or 2.5.

RINA will check the above during periodic audits.

CHAPTER 14 - CONFIDENTIALITY

The information acquired by RINA through the performance of its activities and related to validation of the EPD will be considered and treated as confidential.

CHAPTER 15 - APPEALS

15.1

The Organisation may appeal against the decisions taken by RINA, explaining the reasons for its dissent, within 30 days of the date of notification of the decision.

RINA will examine the appeal within two months of its presentation, possibly also consulting the organisation's representatives.

15.2

All costs connected with the appeal are at the Organisation's expense, except in cases of recognised good grounds to the contrary.

CHAPTER 16 – CONTRACT CONDITIONS

As concerns the contract conditions, the contents of the current edition of the RINA "General Contract Conditions governing system, product and personnel certification" apply. This document can be downloaded from the site www.rina.org.

ANNEX 1 – GLOSSARY

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” in chapter 4.

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) as per paragraph 4.12 or 4.13 of the EPD International AB document “General Programme Instructions for EPD”, 2.01 or 2.5 edition.

EPD PROCESS CERTIFICATION – Certification of the internal validation process of EPD as per the indications in paragraph 5.8 or 5.4 of the EPD International AB document “General Programme Instructions for EPD”, 2.01 or 2.5 edition.

SECTOR EPD – Environmental Product Declaration containing the average product/service data related to the production sites of several organisations belonging to the same production sphere and geographical area (paragraph 4.13 or 4.12.2 of the EPD International AB document “General Programme Instructions for EPD”), 2.01 or 2.5 edition.

ANNEX 2 – FACSIMILE EPD LOGO TYPE

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