Supplementary appendix – Reference scheme: Environmental Product Declaration (EPD)

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CHAPTER 1 - GENERAL

This appendix defines the procedures applied by RINA for validation and verification activities and the methods to be followed by interested parties in order to request and obtain validation/verification on the Environmental Product Declaration (EPD) scheme of products or services, with respect to what is already defined in the General Rules for validation and verification activities of information declared in claims.

The verification system provided by these Rules is an application of the ISO 14025 standard for type III environmental declarations and assesses:

- the conformity of the LCA of a well-defined product, manufactured in identified production sites and with a given production process, to the Product Category Rules (hereinafter PCR) of reference, to the document "General Program Instructions for the International EPD System" (hereinafter GPI) and to ISO 14040 and ISO 14044.
- the conformity of the EPD, based in turn on the results of the LCA, to the requirements of the GPI document and ISO 14025 for the purposes of issuing the validation itself.

RINA offers an accredited certification service according to the following types of EPD verification:

1. **EPD verification**: can be requested by an organisation if the PCRs related to the product/service have already been approved and registered by the Competent Authority (EPD International), in compliance with the GPI document. EPD verification requires subsequent surveillance activities, usually on an annual basis, to ensure that the conditions that allowed the initial validation to be issued are maintained. The following special types of EPDs fall within this type of verification activities, as an alternative to the single-issue EPD
    - Single-issue EPD (Single-thematic EPD - focus on a single environmental impact category, e.g. climate declarations),
    - Sector EPD (sector EPD - average product of several companies belonging to a well-defined sector and/or a specific geographical area),
    - Pre-verified tools (standardised inventories and environmental profiles obtained from tools that guarantee ease of use and full uniformity, e.g., GCCA EPD Tool),
    - Machine-readable EPD (some information is reported in EPDs in a machine-readable format).
2. **Pre-Certification of the EPD** can be requested from RINA by an organisation if PCRs do not exist or are being developed. It has a limited duration of one year maximum. Subsequently and once the relative PCRs have been approved by the Competent Authority, the organisation can request RINA to verify the pre-certified EPD.

    In the case of pre-certification, these verification activities are performed by RINA in the absence of PCRs or taking into consideration any PCRs not yet approved and registered, provided they comply with the requirements specified in the GPI document of EPD International.

    Therefore, in the case of pre-certification, the verification methods may differ from the general validation process in terms, for example, of documentation required, requirements to be met by the LCA study, etc. Pre-certification cannot be renewed.
3. **EPD Process Certification**: can be requested by an organisation if it wishes to verify an internal organisational process aimed at developing EPDs based on the valid GPIs and PCRs covered by the certification scope. The certificate is valid for three years and is subject to annual surveillance audits.
4. **EPD validation for products not yet on the market** in the absence of similar (sibling) products. A similar product is defined as a sibling product when its LCA model is the same as that of future products in terms of data composition. The only differences relate to activity data (e.g. different material or packaging composition, different energy consumption in the production process, different distribution

distance).

The EPD can be developed for any product type and does not have to contain comparative statements between products. Similar product groups or service types may be included in the same EPD. Products/services are considered "similar" if they are

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

Similar products with differences between mandatory environmental indicators of less than ± 10% may be presented using the impacts of an environmentally representative product.

Similar products with differences between the mandatory environmental indicators greater than ± 10% may be presented in the same declaration but reported separately so that the differences are clearly stated and in such a way as to ensure a reasonable number of pages.

CHAPTER 2 – REFERENCE SCHEME/PROGRAM / REQUIREMENTS FOR VALIDATION / VERIFICATION

- ISO 14065:2020 - General principles and requirements for validation and verification bodies for environmental information.
- IAF MD 6:2014 - IAF Mandatory Document for the Application of ISO 14065.
- ISO 14020:2022 - Environmental labels and declarations - General principles.
- EN 15804: 2012+A2:2019+AC (August 2021 edition) - Sustainability of construction works. Environmental product declarations. Basic rules for the product category of construction products.
- ISO 14025:2006 - Environmental labels and declarations - Type III environmental declarations - Principles and procedures.
- ISO 14040:2020/Amd 1:2020 - Environmental management - Life cycle assessment - Principles and framework.
- ISO 14044:202/Amd 2:2020 - Environmental management - Life cycle assessment - Requirements and guidelines.
- ISO/TS 14071:2014 - Environmental management - Life cycle assessment - Critical review processes and reviewer competences: Additional requirements and guidelines for ISO 14044.
- GPI v.4 - General Programme Instructions for the International EPD® System.

2.4 DEFINITIONS

The terminology used in this document is in accordance with the terminology used in: ISO 14001, ISO 14020, ISO 14025, ISO 14040, ISO 14044, EN 15804, ISO 14050, EPD International document "General Programme Instructions for the International EPD System", hereinafter GPI.

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

Environmental performance: the results of an organisation's management of its environmental aspects.

Product Category Rules (PCRs): Set of specific contents that must be taken into account for the identification of the requirements necessary for carrying out the LCA study and for publishing the EPD for each product or product group. The modalities for issuing and registering PCRs are indicated in the document "GPI.

Product system: An elementary set of process units that are interconnected in terms of matter and energy, pursuing one or more defined functions. The term "product" used alone includes not only product systems but may also include service systems.

Process unit: The smallest part of a product system, for which data were collected during the life cycle assessment.

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

Life Cycle Impact Assessment (LCIA): Phase of life cycle assessment aimed at understanding and estimating the magnitude and importance of the potential environmental impacts of a product system.

Non-compliance for Single Topic EPDs, Comprehensive EPDs and Sector EPDs:

- the total absence of consideration of one or more requirements of the reference PCRs;
- the total absence of consideration of one or more requirements of the normative document of EPD International;
- the total absence of consideration of one or more requirements of ISO 14040 and ISO 14044;
- a situation that could lead to
- non-compliance with the mandatory standards for the product;
- non compliance with one or more requirements of the RINA Rules for the validation of the EPD;
- a serious deficiency, in the judgement of the GVI on the basis of its experience, in the performance of the LCA study and/or in the truthfulness of the information contained in the EPD.

Major non-conformity for EPD process certification:

- The total absence of consideration of one or more prescriptions of the reference PCR on one or more EPDs sampled for inspection;
- The total absence of one or more prescriptions of the reference EPD
- The total absence of consideration of one or more prescriptions of the ISO 14040 and ISO 14044 standards on one or more EPDs sampled;
- a situation that could lead to
- non-compliance with the mandatory product standards of the sampled EPDs;
- non compliance with one or more requirements of the RINA Rules for the validation of the EPD;
- a serious deficiency, in the judgement of the GVI on the basis of its experience, in the performance of the LCA study and/or in the truthfulness of the information contained in the EPD sampled
- a serious deficiency within the system of creation and emission of EPDs.

Minor non-compliance for EPD process certification:

- a temporary and non-systematic failure of the system for creating and issuing EPDs,
- a situation such as to cause a non-serious deficiency in the applicable Management System,
- a situation causing a non-serious deficiency that does not however reduce the ability to ensure process and/or product control.

Recommendation: a suggestion for improvement that has no direct bearing on the requirements of the

CHAPTER 3 - CONTRACT

3.1

RINA will prepare the offer on the basis of the following information/documents

- name and address of the applicant
- location and characteristics of the production site(s);
- description of the production cycle and of the product subject of the EPD validation request;
- indication of the PCRs identifying the product subject of the EPD;
- type and number of EPDs subject to pre-certification/verification (full EPD; EPD by single subject; sector EPD; EPD process certification);
- number of sites from which the average data for the LCA study have been taken (only in case of sector EPDs);
- indication of the presence of a reference site for all data collected at the other sites (only in case of sector EPDs);
- the materiality/relevance and level of reliability required by the client; and
- all information reported in the information questionnaire.

Two levels of assurance are established according to the degree of reliability of the data contained in the EPD study:

1. Reasonable Assurance level: always applied in case of first verification and renewal of the EPD;
2. Limited Assurance level: applicable in surveillance verifications.

3.2

The contract stipulated between RINA and the organisation includes:

- the document review of the organisation's documents (including the strategic and risk analysis of validation/verification),
- the collection of sufficient objective evidence on original data/information, ensuring traceability through the data/information management process, further analysis and calculations; the identification of errors and consideration of their relevance; the assessment of compliance with requirements (also by means of field visits/site assessment and telephone or remote interviews).

CHAPTER 4 - PLANNING

4.1

Together with or following the validation/verification request, the organisation is to make the following documentation available to RINA

- copy of the EPD subject to verification (in the case of a single issue EPD, in addition to the copy of the EPD relative to the single environmental impact category chosen, a copy of the complete published EPD or, if the latter has not been produced, a copy of the documentation indicating the environmental performance of the other environmental impact categories included in the complete EPD)
- copy or summary report of the LCA related to the product covered by the EPD;
- copy of the reference PCRs approved and registered (in case of EPD validation) by the Competent Body;
- internal procedures (which can also be viewed during the on-site visit) established to acquire, process and update the data used for the LCA, to carry out the review of the EPD and to detect any significant changes to the aforementioned data;
- procedures established to assess compliance with the environmental legislation applicable to the product and to the relevant production processes, which can also be viewed during the on-site inspection (only in the case of a company that is not ISO 14001 and/or EMAS certified)
- list of procedures implemented to maintain EPD process certification (only in the case of EPD process certification)
- list of EPDs subject to internal validation from which RINA will be able to select some EPDs to randomly check their compliance with the EPD standard (only in the case of EPD process certification)
- list of the production sites from which the average data included in the sector EPD are taken (only in case of sector EPD).

In addition to the above documentation, RINA may, at its discretion, also request additional documentation to be examined which it considers necessary for verification.

CHAPTER 5 – VALIDATION/VERIFICATION EXECUTION

The team reviews the documents to ensure that they meet the agreed verification criteria.

In general, the document review shall verify:

- that the EPD document and the LCA study comply with the requirements of the GPI and corresponding PCR, including:
    - the data used for the LCA calculations,
    - the way the LCA-based calculations were performed and their compliance with the calculation rules,
    - the presentation of the environmental performance in the declaration
    - the presentation of additional environmental, social, and economic information, and
    - any other information contained in the statement;
- the procedures established for updating the information in the LCA and EPD;
- the procedures established for assessing compliance with environmental legislation applicable to all relevant processes and to the product (only in the case of a company not certified ISO 14001 and/or

EMAS).

If the documentation is incomplete or non-compliant in any of its parts or annexes, the organisation will be informed.

Any non-conformities found in the documentation must be resolved by the organisation, to the satisfaction of RINA, before the audit process continues. Failure to send the requested integrations is an obstacle to the continuation of the validation/verification process.

Through examination of the documentation, the team initiates and proceeds with the strategic analysis and risk analysis as described below.

Strategic analysis

RINA at the beginning of the validation/verification assesses the likely nature, extent and complexity of the validation/verification tasks by performing a strategic analysis of all the activities concerning the EPD.

The strategic analysis includes the following factors:

a) the organisation's control system for identifying and controlling risks in the processing of data that could result in incorrect data in the EPD;
b) any changes to the installation during the year (structure of the organisation, product or production or process changes) if the EPD has already been verified previously;
c) any management system (environmental or other) that the organisation adopts relating to data management or processing;
d) the type, purpose and complexity of equipment and processes used, including calculation methods.

Risk analysis

On the basis of the result of the strategic analysis, RINA conducts a risk analysis taking into consideration the sources and scale of any errors, omissions or misrepresentations in order to prioritise the areas and extent of validation/verification of EPD data and information and to provide input to the development of the validation/verification and sampling plan. In developing the risk analysis, the team should at least consider the following:

- the level of detail of available documentation
- the nature of the allocation methods;
- the degree of complexity and extent of system boundaries;
- the representativeness of use and end-of-life scenarios, where applicable.

As a result of the strategic and risk analysis, the verification timeframe and sites to be sampled may be changed from what was defined in the contract review.

Validation/Verification of processes

After reviewing the documentation, the team identifies additional topics and aspects (objective evidence) that need to be explored with the organisation.

The validation/verification activities must at least allow sufficient data and information to be obtained to assess the EPD and to verify the reliability of the data collection, processing and control systems.

During the verification, RINA must view the design developed within the software used for the EPD calculation, if any, in order to assess the correctness of the choices made. It is not possible to successfully conclude an EPD audit without having been able to verify, even under the guidance of the personnel in charge of the project, what has been developed within the software.

The on-site audit is carried out on the basis of the documentation provided by the applicant and will be mainly aimed at ascertaining the correctness of the information deriving from the LCA and contained in the EPD and the application of the procedures set up for the acquisition and updating of this data as well as the other procedures necessary for the maintenance/operation of the EPD process certification, in compliance with the reference standard.

In order to assess the product's compliance with the information contained in the LCA and EPD, the correct evaluation and definition of, among others, the following will be taken into consideration:

- system boundaries;

- process units considered;
- methodologies and instrumentation for data collection;
- measurement of elementary flows in and out of the system boundaries;
- supply of raw materials/components;
- transport;
- production, including energy consumption;
- effectiveness and significance of the assessment of potential impacts.

RINA has no responsibility for the legality of the product, its production process or its supply chain. A basic assessment of compliance with relevant environmental legislation is, however, part of the EPD verification.

RINA is to assess the documentation of compliance with the process and product environmental laws applicable to the organisation, with particular attention to the list of materials and chemicals and the information related to pollution permits included in the EPD. RINA must check that the organisation has procedures to keep up to date with the relevant process and product legislation and has access to all the specific information relevant to processes and products for the actual product category issued by the Authorities.

The organisation, where it is not already ISO 14001 and/or EMAS certified, shall therefore provide evidence of the internal procedures and/or measures adopted to ensure legislative compliance with the environmental legislation applicable to the product covered by the EPD and its production process.

The organisation shall ensure access to documents, products and sites for conformity assessment, including any subcontractors.

The assessment visit will be carried out by qualified RINA auditors and will essentially consist of:

- an initial meeting with the organisation's auditors to agree on the aims and methods of the visit;
- an inspection of the production site(s) where the product covered by the EPD is manufactured;
- the assessment of the conformity of the product with the contents of the LCA and EPD(s) in question;
- an assessment of the applicable environmental legislation in the case of companies not certified ISO 14001 and/or EMAS;
- a final meeting to illustrate the outcome of the examination.

During the visit the organisation shall demonstrate the practical application of the procedures presented and the correctness of the information contained in the EPD.

Additional requirements for EPD Process certification:

In the case of verification for EPD Process certification, the team:

- verifies that the organisation is capable of managing the process;
- verifies the correct implementation of the organisation's procedures;
- verifies on a sample basis the conformity of one or more EPDs issued by the process itself;
- verifies that the organisation has the necessary skills available;
- verifies that the organisation is able to manage;
  a) the organisational aspects;
  b) the collection and processing of information and verification of the need for changes and/or updates;
  c) internal audits;
  d) the preservation of documents and records.

Draft Report

After the on-site visit, the team provides the organisation with a draft Validation/Verification Report that will summarise the findings that need to be further elaborated, investigated, or supplemented by the organisation to confirm that the EPD meets the criteria/requirements of the agreed scheme.

The organisation must provide additional clarifications or make the necessary improvements to the EPD and documentation to achieve a positive verification outcome.

Depending on the nature of the improvements/corrections and/or the documentation provided, a site visit may be necessary to verify the correct implementation of the proposed corrective actions.

Management of findings

After analysing the causes of any non-conformities indicated on the above report, the organisation must propose to RINA, by the date indicated on the report itself (where applicable), the necessary treatments for the non-conformities (and/or deviations, where applicable) as well as the necessary corrective actions and the expected time for their implementation.

Acceptance of these proposals and of the expected time for implementation is communicated in writing by RINA to the organisation.

For the continuation of the audit process of the EPDs for each subject, complete and sector, it is necessary that all the non-conformities found are positively resolved by the organisation and accepted by the Team Leader of the audit team.

For the continuation of the EPD process certification process, all major non-conformities must be positively resolved by the organisation and accepted by the audit team leader. Minor non-conformities may be closed during the subsequent certification maintenance audit, subject to submission by the organisation and subsequent approval by the Team Leader of the corrective action proposals.

Findings concerning the Environmental Product Declaration document, regardless of whether they are classified as non-conformities and/or recommendations, must in any case be resolved by the organisation for the continuation of the validation or pre-certification process.

In the presence of non-conformities to the reference standards, the verification process is suspended.

In such cases, within 6 months, a supplementary audit must be carried out to ascertain the correct application of the corrective actions proposed; if this audit is successful, the EPD validation process is resumed.

If the 6-month period is exceeded without feedback on the implementation of the proposed corrective actions, the LCA and EPD will be fully reviewed within a period of 12 months from the date of the finding.

After the above 12-month period has elapsed without positive conclusion of the assessment, RINA reserves the right to close the validation file, charging the time and expenses incurred up to that moment. In such cases, the organisation wishing to continue with RINA certification must repeat the entire validation process by submitting a new request.

All costs related to any additional audits due to shortcomings in the System/Process/Product covered by certification are to be borne by the organisation.

Final Report

On receipt of the answers formulated by the organisation and the documents amended as a result of the findings, the Draft Validation/Verification Report is revised to reflect the answers provided by the organisation and the team's comments in relation to each finding. The Final Validation/Verification Report is prepared including the final validation/verification opinion.

The Final Validation/Verification Report will be issued once all findings in the draft Validation/Verification Report have been resolved and accepted by RINA.

Validation/Verification Opinion

On the basis of the information collected during validation/verification and if requested by the client, RINA issues a Validation/Verification Opinion for each EPD submitted for validation/verification by the organisation. The Verification Opinion issued for the verified EPD contains the following information:

1. Product-specific EPD and single issue: for multi-product EPDs, references are given to all and only those products included in the verified EPD. The Opinion may also be issued with a unique reference to the verified EPD;
2. EPD for sectors: possibly attached, all the organisations/sites included in the sector EPD (scope of the certificate) and the production sites used as sample to determine the environmental impacts of the sector expressed in the EPD;
3. Pre-verified Tool: a reference to the revision of the tool that was subject to verification.

EPD Process certification: the certificate must indicate the CPC (UN Central Product Classification) codes for

which the organisation's possession of sector competence has been verified. Alternatively, RINA can indicate in the certificate the CPCs in relation to which the organisation has developed the verified EPDs. The certificate is valid for three years.

Surveillance for EPD Process

EPD Process certification is subject to a periodic surveillance activity aimed at assessing the correct implementation of the supporting procedures and the correct development of the individual EPDs carried out during the period since the previous surveillance/verification. This activity will be carried out on the basis of sampling against the individual EPDs implemented by the responsible party.

During the three-year period of validity of the EPD Process certification, two surveillance audits are foreseen (one for each year following the year of certification). The organisation, at least three months before the date scheduled for the surveillance audit, must inform the appointed team of the number of EPDs issued.

Renewal of the EPD

The validation of the EPD will be renewed following the positive outcome of the review of the LCA study of the product and of the EPD itself and a verification visit to be carried out, as a rule, with the same criteria as the first validation visit.

In particular, a new document review will be carried out to assess any changes introduced in the LCA and the consequent updating of the information and data contained in the EPD.

Following the successful outcome of the document review, a new visit will be carried out on the production site with the same criteria indicated previously, in order to verify among other things:

- the general correctness of the information contained and updated in the LCA and EPD;
- the application of the procedures prepared for updating the data used for the LCA and for carrying out the review of the EPD;
- the conformity of the characteristics inherent in the product with what is declared by the organisation in the EPD;
- the presence of any significant variations concerning the product or the production process of the product covered by the EPD;
- the evaluation of the applicable environmental legislation in the case of a company not certified ISO 14001 or EMAS.

In particular cases and, in any case, at the discretion of RINA (e.g. on-site audit carried out the previous year during surveillance, marketing site only and not production site, EPD of products not produced in series, impacts associated with the product assembly phase (core processes) very low compared to the contributions given by the other phases evaluated (upstream and downstream processes)), except for EPD process certification, the document analysis can be considered sufficient to assess compliance with the reference standard without the need to perform an on-site visit.

The dates of the verification visits will be agreed with the organisation well in advance and officially confirmed to it at least one week before the visit.

Failure to perform periodic validation of the EPD will be notified in writing by RINA by registered letter to the organisation and sent for information to the accreditation body and to EPD International, for their respective decisions.

If the product has obtained validation of the EPD by another accredited Certification Body and requests subsequent validation from RINA, transfer of validation will be possible provided the following conditions are satisfied:

- the organisation interested in obtaining recognition of its validation by RINA must have sent the informative questionnaire for the purpose of drawing up the economic offer for the transfer;
- the organisation's validation is issued by an accredited body for EPD or EPD verifier recognised by EPD International;
- the validation must be valid;
- the certificate must not be suspended (applicable for EPD process certification);
- the body must not be suspended;

- the product/services subject to the EPD document fall within the accredited scope of RINA, as does the type of EPD (full EPD, single issue, sector, EPD process certification).

The organisation must provide RINA with a copy of the validated EPD(s) and fill in the Validation Request Form and the Informative Questionnaire.

If these prerequisites are satisfied, the EPD validation is transferred maintaining the validity deadline of the EPD document or certificate (in the case of EPD process certification) foreseen by the previous certification body and with it the annual surveys.

Organisations holding EPD validations not covered by the above-mentioned accreditation and/or prerequisites will have to be treated as new clients following the established verification process.

CHAPTER 6 – DECISION AND ISSUE OF THE VALIDATION/VERIFICATION STATEMENT

The validation/verification report and the validation/verification opinion are subject to independent technical review and decision making to ensure that the validation/verification process has been carried out in accordance with the agreed scheme/programme, that the procedures for validation/verification activities have been properly followed and that due professional diligence and judgement have been applied.

The independent technical reviewer also assesses whether the evidence gathered is sufficient to enable RINA to issue a validation/verification opinion with reasonable certainty.

RINA informs the organisation in writing of the conclusions it has reached concerning the validation/verification.

6.3 EPD Process Certification

Also, in the case of annual surveillance, the verification documentation is subject to assessment by the independent reviewer, who may issue a positive or negative opinion concerning the maintenance of certification.

CHAPTER 7 – MODIFICATION AND WITHDRAWAL OF THE STATEMENT

The General rules for validation and verification of information declared in claims apply with the addition of the following chapter:

7.5 Suspension, Reinstatement and Revocation of the EPD Process Certification

The validity of the Certificate is suspended in accordance with the "GENERAL CONTRACT CONDITIONS GOVERNING SYSTEM, PRODUCT AND PERSONNEL CERTIFICATION" and in the following specific cases:

- if the organisation does not allow the scheduled audits to be conducted at the required frequency and special audits;
- if nonconformities are found in the management system which have not been resolved within the time limits established by RINA;
- if the organisation has not complied with the deadlines established for the communication of corrective actions, following non-conformities (major or minor) indicated on the audit report;
- if the organisation has made major internal changes to the site/s, moves to another site/s without reporting these changes to RINA;
- if the organisation has made significant modifications to its management system that have not been accepted by RINA;
- in the case of major restructuring of the organisation not communicated to RINA;
- for refusal or obstacle to participation in audits of observers from an accreditation body;
- any justified and serious complaints received by RINA.

The organisation may also request RINA, giving its reasons, to suspend certification for a period generally not exceeding six months and, in any case, not beyond the expiry date of the certificate.

The suspension is notified in writing (PEC or equivalent method), stating the conditions for reinstating certification and the date by which it is to be implemented.

Suspension of validity of the certificate is made public by RINA directly on the website www.rina.org.

Reinstatement of certification is subject to verification that the shortcomings which caused the suspension have been eliminated by means of an in-depth audit to check compliance of the management system with all the

requirements of the reference scheme.

It is notified in writing to the organisation (PEC or equivalent method) and made public by RINA via the www.rina.org web site.

Failure to fulfil the above conditions within the established time limit will lead to revocation of the Certificate of Conformity.

Revocation of the Certificate of Conformity may be decided in accordance with the "GENERAL CONTRACT CONDITIONS GOVERNING SYSTEM, PRODUCT AND PERSONNEL CERTIFICATION" and in the following specific cases:

- when circumstances, such as those mentioned for suspension, occur and are judged to be particularly serious;
- if the organisation suspends its activities or services covered by the certified management system for a period generally exceeding six months;
- if the organisation does not accept the new contractual conditions;
- in the case of a multi-site organisation, if the headquarters or one of the sites does not comply with the criteria required to maintain the certificate;
- for any other serious reason, in the judgement of RINA, such as, for example, but not limited to, proven inability of the system to pursue its objectives of compliance with legislative or contractual constraints or product safety.

Revocation of the Certificate of Compliance is notified in writing to the organisation (PEC or equivalent method) and is made public by RINA.

If the organisation wishes to be re-certified after revocation, it must submit a new application following the entire procedure.

7.6 Renunciation of EPD Process certification

The certified organisation may send a formal communication of relinquishment of certification to RINA, before the expiry date of the Certificate, including the case in which the organisation does not wish to or cannot comply with the new instructions issued by RINA.

On receipt of this communication, RINA initiates the procedure to render the certificate invalid.

In general, within one month from the date of the communication, RINA updates the validity status of the certificate.

7.7 Extraordinary information by the certified company

During the period of validity of the EPD registration, if significant changes occur (e.g. increase in environmental impact values by more than 10%) to the production process and/or product such as

- changes in the product (design, materials, dimensions, etc.) and consequent change in environmental impacts even of a single category;
- changes in the process (characteristics of the production process, technologies used, within the organisation or by a supplier) with consequent variation of the environmental impacts also of a single category;
- any other change that causes or triggers a significant variation (more than 10%) in environmental impacts, even in a single category;

the organisation undertakes to promptly communicate these changes in writing to RINA, together with the necessary considerations and evaluations of the organisation on any variations in the environmental impacts of the product for each category defined in the GPI document of EPD International and, if applicable, in the reference PCRs.

The organisation must assess the influence these changes may have on the LCA of the product previously performed and consequently on the contents of the validated EPD and must communicate this information to RINA.

The organisation is bound to always respect the requirements for the validation of the EPD also in the case of modifications communicated to RINA.

In particular, the EPD document must be reissued if one of the environmental indicators has worsened by more

than 10% compared to the currently published data.

RINA reserves the right to request further information from the client that can demonstrate how the organisation has reacted to the above and any further additions.

If this information proves to be insufficient or ambiguous, RINA may consider an extra audit or suspension of the validation.

7.8 Reissue of documents

In case of reissue of a new EPD document, differences from the previous version of the EPD document must be indicated.

In particular, an EPD must always be updated and reissued during its period of validity if there are changes in technology or other circumstances that lead to:

- an increase of 10% or more in the environmental indicators declared in the EPD,
- errors in the declared information, or
- significant changes to the declared product information, content declaration or additional environmental information.

If such changes have occurred without the EPD being updated, the organisation shall contact the Secretariat of the International EPD System to have the EPD de-registered.

More generally, the organisation may choose to make changes or corrections to an EPD during its period of validity.

For changes affecting any of the data verified in the EPD (e.g. environmental performance indicators), a verification must be carried out.

This verification may be based on one of the following options:

- If the verification is conducted on the same version of the GPI and corresponding reference PCR used in the EPD issuance verification, even if the PCR has expired, the revised EPD will retain its original validity period;
- If the verification is conducted on the current version of the GPI and corresponding current valid reference PCR, the verification shall be conducted as a new validation and a new validity period will be defined based on the new approval date.

In relation to the type of modifications made, RINA reserves the right to request a review of the LCA and the related EPD and to perform additional audits which may be documental and/or at the organisation's site, aimed at verifying whether the conditions for maintaining the validation of the EPD still exist.

If these conditions are not met, RINA will inform the organisation in writing of the need to re-issue the revised EPD(s).

A copy of the documentation related to each review of the LCA, the EPD and the procedures prepared for updating the information and for implementing and maintaining the EPD process certification must be kept at RINA's disposal for review during the audit.

The organisation is to inform RINA of its intention to relinquish validation or alternatively to proceed with its renewal as described in the previous chapters.

RINA will notify the organisation of the revocation of validation.

CHAPTER 8 - COMPLAINTS AND APPEALS MANAGEMENT

The General Rules for validation and verification activities of information declared in claims apply

CHAPTER 9 - CONTRACTUAL CONDITIONS

The General Rules for validation and verification activities of information declared in claims apply

CHAPTER 10 - AGREED-UPON PROCEDURES (AUP)

RINA may perform an AUP engagement provided that the intended user agrees on the evidence collection activities and assumes responsibility for these procedures.

Should the organisation request, as a result of the service provided, a report on the results of the verification

activity without indicating an opinion, RINA will explicitly agree at contractual level with the client, in the offer and in the contract:

- the procedures to be performed;
- the elements to be verified;
- the criteria for collecting evidence;
- the criteria to be used to determine the results;
- the minimum elements to be stated on the report.

If the intended user intends to disclose the results of the agreed procedure to a wider audience (e.g. public statement), any limitations on the disclosure of the information contained in the report should be specified both in the agreement signed with the intended user and in the report itself.