

PROGRAM RULES OF THE EAA EPD PROGRAM

Version of 30 January 2013 (i.e. update of version of 14th November 2005)

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1 GENERAL

1.1. Scope of the program

The EAA EPD business-to-business program supports the development and publication of Type III environmental product declarations (EPD) for building products containing

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aluminium as one of the main raw materials, e.g. aluminium windows, aluminium curtain walls, coated aluminium sheets and aluminium composite panels for cladding and roofing. This EAA EPD program aims at facilitating the development of EPD for aluminium building products in Europe by using:

- A European approach: Many manufacturers of aluminium building products operate several plants located in various European countries while their aluminium material supply usually comes from variable origins within or outside Europe. Hence, in most cases, a European approach is the most relevant for developing EPD on aluminium building products used in Europe.
- An EPD software tool: Many aluminium products, e.g. windows and curtain walls, are dimensioned according to the building requirements. Hence, this program allows the production of EPD from a verified EPD software on basis of specific parameters supplied by authorised users. The EAA EPD software tool is a pre-verified software.
- Consolidated EPD: A building project often requires several customised aluminium products. In order to facilitate the B2B use and communication, consolidated EPD regrouping a set of aluminium products can also be produced through this program.

As a result, the program further supports EPD software for generating dynamically EPD according to the PCR. The EPD software owner shall be the program operator or any company being member of the Building Group of the European Aluminium Association. The list of EAA Building Group members is available on request (EPD@eaa.be).

The EAA EPD program also allows the production of consolidated EPD in accordance to the additional requirements reported in the PCR.

EPD from this program are not intended for comparative assertions. The program organisation is reported in Fig.1

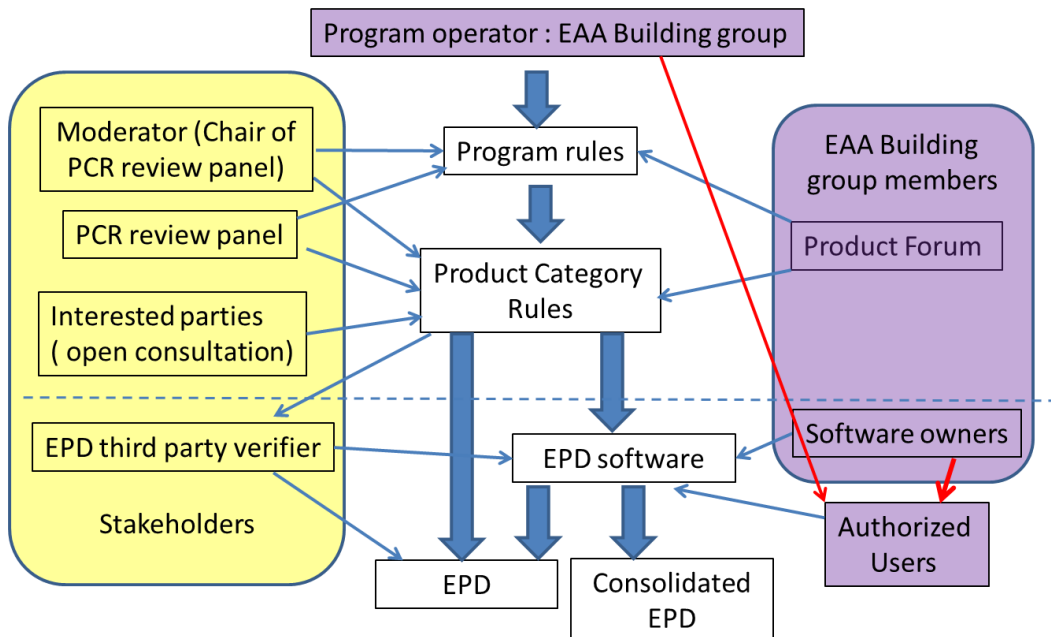


Fig. 1 EAA EPD program organisation

1.2. Objectives of the program

The objective is to develop credible, robust and consistent EPD for business to business communication. EAA members will be supported in developing EPD of their products.

1.3. Program operator

The program operator is the Building Group of the European Aluminium Association. The program operator prepares, maintains and communicates the general program rules. The program operator is responsible for setting up and inviting the product forum for the PCR development as well as the third party PCR review panel. The program operator also appoints the third party verifier for the verification of the EPD.

1.4. Product forum

The program operator invites the members of the product forum. The Product forum is mainly composed of internal experts issued from the EAA members of the Building group. The product forum includes the “moderator” and can also include external experts. It shall not be composed of more than 20 participants. The product forum prepares the draft documents for any revision of program rules or PCR.

1.5. PCR review panel

The PCR review panel is composed of at least 3 independent EPD experts, i.e. two members and the moderator. It shall not include any expert having economic interest or any link with the aluminium industry. The program operator in agreement with the moderator shall ensure a reasonable mix of interested party perspectives and competencies. The moderator coordinates the activity of the PCR review panel. When needed, the program operator may facilitate the work of the PCR review panel, e.g. meeting or conference call facilitation. With the exception of the moderator, members of PCR review panel shall not be remunerated by the program operator. The program operator may only cover operating costs (e.g. travel cost) directly imputable to the participation in the review panel.

The combined competencies of the PCR review panel should include:

- General background knowledge of relevant sector, product and product-related environmental aspects;
- Expertise in LCA and methodology for LCA work;
- Awareness of relevant standards in the fields of environmental labelling and declarations and LCA;
- Knowledge of the regulatory framework within the scope of the PCR;
- Knowledge of the program for Type III environmental declarations.

1.6. Moderator

The moderator shall act as the coordinator between the product forum and the PCR review panel. The moderator participates in the product forum. The moderator provides to the PCR review panel the program rules and/or PCR prepared by the product forum, possibly with a preliminary review statement. The moderator coordinates and consolidates the review statements expressed by the various members of the PCR review panel. The moderator prepares accordingly an amended document which shall be agreed by each member of the reviewing panel. If requested by a member of the panel, the moderator shall also collect the comments of the PCR review panel and should include them as annex of the final document.

The moderator shall also verify and secure the respect of the open consultation process and procedure by the program operator. The comments expressed by interested parties during this open consultation shall be addressed by the PCR review panel in its review statement and its final version of the document.

1.7. Involvement of interested parties

The program operator is responsible for inviting the interested parties and facilitating their participation via an open consultation. This open consultation can be organised via electronic media, e.g. web, and/or via meetings. This open consultation shall take place at the start of the EPD program establishment, when the scope of the program is amended or when a new PCR covering a new category of products is developed. When the program rules or PCR are updated, the PCR review panel shall inform the program operator if this update requires the organisation of an open consultation. The review statement regarding this open consultation requirement shall be included in the review report. Interested parties are invited then to comment the draft documents. The PCR review panel shall address these comments in its review statements and its final version of the document.

1.8. Definition of product categories

The product forum defines which product category is covered by a PCR document. The product forum decides if a new PCR shall be developed to cover a new product category.

1.9. Compliance with relevant standards

As illustrated in Fig.2, EPD developed under this program shall comply with

- ISO 14025 Environmental labels - declarations – Type III environmental declarations – principles and procedures,
- ISO 14040 series of standards, Environmental management — Life cycle assessment
- ISO 21930, Buildings and constructed assets “Sustainability in building construction— Environmental declaration of building products”. EPD data shall be calculated and documented in accordance with
- ISO 15686-1 Buildings and constructed assets -- Service life planning -- Part 1: General principles and ISO 15686-8 Buildings and constructed assets -- Service life planning -- Part 8: Reference service life.
- EN15804:2012 Sustainability of construction works - Environmental product declarations - Core rules for the product category of construction products, with amendment.

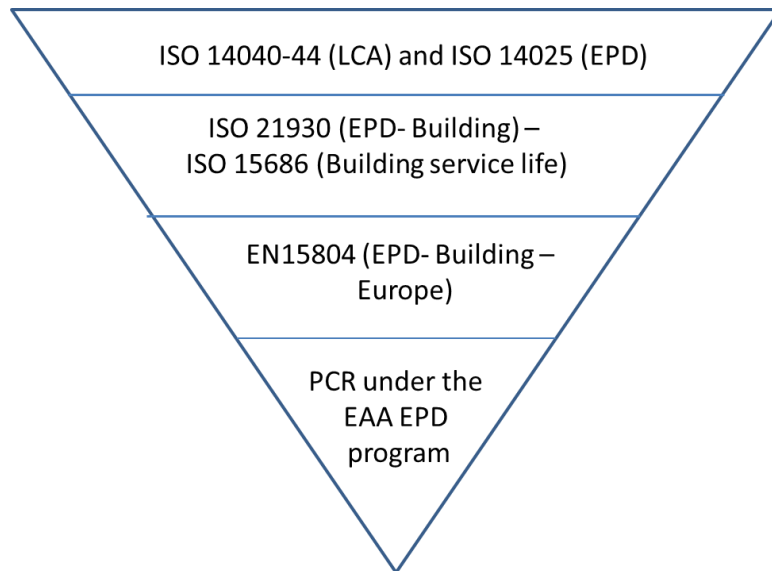


Fig. 2 ISO and EN standards governing the EAA EPD program

1.7 Data confidentiality management

Specific LC-Inventory data and LC-Impact Assessment data for the LCA underlying an EPD is developed and maintained by EAA or on behalf of EAA. In principle, this data is confidential. It shall however be made available to the third party verifier of the EPD who in turn shall keep this data confidential. Life Cycle Impact Assessment data and additional information is published in the EPD according to the selected parameters listed in the PCR document.

2 PROCEDURE FOR DEVELOPMENT, REVIEW AND MAINTENANCE OF PCR

The product forum decides when a new PCR document should be developed under the EPD program. The product forum prepares then a new draft PCR document. The product forum also prepares the draft PCR documents for any revision or update. The moderator provides the draft PCR document to the PCR review panel, possibly with a preliminary review statement. The review statement may also be prepared in its entirety by the PCR review panel. The review statement, comments of the members of the review panel and any response from the product forum to recommendations made by the reviewers, shall be included in the PCR document.

In particular, the PCR review shall ensure that

- The PCR support credible and consistent EPD;
- The PCR are in conformity with the standards listed in point 1.6
- The additional information is based on scientifically sound methodology.

The PCR review panel reviews and requires accordingly an update of the PCR document. The final version of the PCR shall be agreed by each member of the PCR review panel. In the final version, comments from panel review members can be added as annex when requested. The final version of the PCR is published on the EAA website.

3 MAINTAINING A PUBLICLY AVAILABLE LIST OF PCR

The program operator maintains a publicly available list of PCR documents issued by the program. The list and PCR documents are accessible via the web-site (www.alubuild.eu and/or www.alueurope.eu).

4 MONITORING CHANGES IN RELATION TO NEW STANDARDS

Once new or updated ISO or EN standards affecting PCR or EPD of building products are published, the program operator should organise an update of the program rules and PCR in order to align the EPD program to these new standards.

5 ADDITIONAL PROVISION FOR EPD SOFTWARE AND CONSOLIDATED EPD

As illustrated in Fig.1, EPD software may be used within the EAA EPD program to generate dynamically verified EPDs, e.g. EPD calculated on basis of product parameters provided by a user through a user interface.

In addition to the usual verification of EPDs, specific provisions shall be included into the PCR in order to allow the verification of EPD software and the verification of consolidated EPD, i.e. EPD for a set of aluminium products.

Regarding the EPD software, the software owner shall be the program operator or any company being member of the Building Group of the European Aluminium Association.

The EPD software owner shall demonstrate to the verifier that the EPD software has been designed to avoid any manipulation for generating biased EPD. The Program operator in agreement with the software owner shall establish a list of authorised users (See section 7). Any EPD generated by an authorised user of the pre-verified EPD software shall be considered as a verified EPD under the EAA EPD program, provided that it has received an ID code by the program operator. The list of ID codes and EPD producers shall be accessible via internet. The EAA program operator shall keep track of all the ID-numbered EPD generated within the program and shall be able upon request to provide any of these EPDs.

6 PROCEDURE FOR THIRD PARTY VERIFICATION OF EPD

The program operator appoints the third party experts(s) for the verification of an EPD. The appointed EPD expert(s), i.e. the verifier(s), shall be independent, i.e. without any economic interests or any other link to the aluminium industry. Members of the PCR review panel can also act as verifiers for the EPD.

The requirements for the verifiers in terms of competence are the following:

- Knowledge of relevant industry, product and product-related environmental matters;
- Process and product knowledge of the product category;
- Expertise on LCA and methodology for LCA work;
- Knowledge of the relevant standards in the field of environmental labelling and declarations, and life cycle assessment;
- Knowledge of the regulatory framework in which requirements for environmental declarations have been prepared;
- Knowledge of the program for Type III environmental declarations.

At least one verifier shall verify the EPD document(s) on basis of the confidential LCA report and the PCR document.

For the verification of EPD software, the verifier(s) shall get access to the software and to several representative EPD samples generated with the software. In addition, a software manual may be provided to the verifier(s) to facilitate the software testing and verification.

The verification procedure shall be transparent. The verifier(s) shall generate a report documenting the verification process, while adhering to the obligations for data confidentiality. This report shall be available upon request.

The verification procedure shall confirm whether the information given in EPD accurately reflects the information in the documents on which the declaration is based. The verification procedure shall also confirm whether this information is valid and scientifically sound. The verification shall at minimum confirm:

- Conformance with the PCR and EN15804
- Conformance with ISO 14040 series of standards;
- Conformance with the EAA program rules, plausibility, quality, accuracy and completeness of the LCA-based data;
- Quality and accuracy of additional environmental information;
- Quality and accuracy of the supporting information.

7 MAINTAINING A PUBLICLY AVAILABLE LIST OF VERIFIED EPD, VERIFIED EPD SOFTWARE AND THEIR AUTHORIZED USERS

The program operator shall maintain a publicly available list of EPDs verified within this EAA EPD program. For EPD software, the program operator shall maintain the list of verified EPD software. This list shall include the name and address of the EPD software owner as well as the EPD samples which have been used for the verification. For each of the verified EPD software, the program operator shall maintain a list of authorised users. This list of authorised users shall include

- - The name and address of the authorised user
- - At least one representative EPD sample(s) produced by the authorised user

An authorized user shall be a company member of the EAA building group or a company using products produced by the members of the EAA building group.

Only EPD produced by authorized users shall be considered as part of the EAA EPD program. These lists are accessible via the EAA website (see www.alubuild.eu or www.alueurope.eu).

8 ESTABLISHING PROCEDURES TO AVOID MISUSE OF REFERENCES TO THE PROGRAM, ITS EPD SOFTWARE AND ITS LOGO

The general legal requirements in Belgian legislation for the protection of rights on intellectual property apply.

The program operator develops a procedure to follow up misuse of references to the program and its logo as well as of the EPD software.

The program operator agrees on the list of authorised users of the software.



The program operator may decide to remove from the list of authorised users, any user who does not properly use the software or who generates inappropriate or misleading EPDs.

The program operator should take any reasonable measure to avoid any use of verified EPD software by unauthorised users.

9 FURTHER INFORMATION

For any further information, please contact EPD@eaa.be or the Building Group of the European Aluminium Association, 12 Avenue de Broqueville, 1150 Brussels, tel: +32 2 775 63 50.