Conformity assessment programme

Tracking of the versions

Version	Comment	As of
1.0	Introduction of version numbers, revision and/or extension to meet requirements for an accredited body according to ISO 17065.	2022-04-20
2.0	Now 1-2 verifier teams, written approval from the customer, V-PCR no longer signs	2023-09-20

The path to the EPD as a process flow (according to ISO 17065, chapter 7, referring to ISO 14025):

7.1 General information

Bau EPD GmbH operates a conformity assessment programme in accordance with ISO 17065 and ISO 14025 for verifying EPDs (environmental product declarations). EPDs are issued and verified according to general standards for life cycle assessment (ISO 14040 and 14044) and specific standards, for construction products according to EN 15804 and ISO 21930 and further product category rules and guides. Details on programme operation, the implementing bodies as well as detailed LCA calculation rules are provided in the Management System Handbook (MS-HB) of Bau EPD GmbH with reference to all pertinent applicable documents (M-Docs).

7.2 Application

Interested customers must submit an application for the verification of their EPD documents, see M-Doc 27-1 “Application for EPD verification”, this form must be completed and signed by the customers and submitted.

7.3 Application evaluation, PCR creation

The evaluation of the application is carried out by the head of the conformity assessment body (HCAB) or the programme management of the EPD programme (PrM-EPD) directly in the application form M-Doc 27.

When creating an EPD, there are basically two technical document parts that form the framework of the EPD programme (product category rules/PCR according to ISO 14025):

General product category rules specify the contents of EN 15804 and describe the requirements for the project report and the calculation rules for the life cycle assessment when creating an EPD. The general product category rules apply to all products and must be observed.

In the specific PCR-B guidelines, product-specific specifications are made which, in a defined scope, are to be applied to all products. There is a list of technical features which must be declared and which documentation is required on aspects of environmental and health protection. Likewise, very detailed calculation rules can be used.

When evaluating the application, it will be determined whether a product-specific product category rule (PCR-B) exists or needs to be established for the named products. In accordance with ISO 14025, a Product Group Forum (PGF) is convened when new PCRs are created or existing PCRs are extended. The PGF is composed of industry representatives and LCA experts from the independent PCR committee. All interested parties and stakeholders are involved in the creation of such rules before they are released and published. This creates the greatest possible transparency, comparability and thus legal certainty with regard to EPDs. A PCR-B also serves as a format template for the EPD document.

When preparing LCAs, all product-related PCRs must be fully implemented.

In case of a positive evaluation of the application for EPD verification, Bau EPD GmbH will submit an offer to the customer according to M-Doc 03 “Contract verification and participation in EPD programme Bau EPD”.

After commissioning, Bau EPD GmbH evaluates the submitted EPD documents.

Note 1: EPD customers can either prepare and submit the LCAs and EPDs themselves (in-house) or commission external LCA specialists to do so. Parts of the texts of the EPD such as product descriptions can be formulated by the manufacturer. For the modelling of the LCA, interpretation of the data as well as the preparation of the project report on the LCA study, special software and basic databases as well as very specific and detailed knowledge are required.

Note 2: The activities carried out by the PGF to prepare a PCR can and should be done in parallel with the LCA preparation process.

7.4 Evaluation (verification)

The evaluation plan includes the comparison of the submitted documents with the related standards and regulations according to which they must be prepared.

Verifiers are selected according to ISO 14025 based on clear qualification criteria.

Evaluation is performed by one verifier or teams of two verifiers and based on agreed standards and general and specific PCR documents, as well as reporting templates and checklists.

Applicants are required to submit to Bau EPD GmbH the data entry form of the life cycle inventory analysis, the project report and the EPD document. The list of files is complete with the filled-in M-Doc 08, an Excel template for feeding EPD data into digital databases. If these documents are prepared by external service providers ("LCA-practitioners"), Bau EPD GmbH requires written approval from the applicant regarding the latest status of the documents to be transmitted before the verification process can begin in M-Dok M27-2.

The core process in the flow of the verification process is the identification of non-conformities with the agreed regulations and their careful documentation. The customer will be informed when non-conformities need to be resolved and additional evaluation tasks need to be performed.

7.5 Assessment

The evaluation results are assessed by the head of the conformity assessment body (HCAB) or the programme management of the EPD programme (PrM-EPD) based on the verification reports compiled by the verification team. The assessment covers the completeness of the verification reports, the presence of the signatures and whether all items on the checklist have been assessed as positive. The positive assessment is documented with the signature in the EPD documents.

7.6 Decision on issuance of the declaration (decision on certification)

The decision on certification is made by the HCAB on the basis of the verification reports, the EPD document and following random checks of the M-Doc 08.

The decision and the reasons for it are communicated to the customer.

7.7 Documentation and ownership rights

The verification reports, the project report, the life cycle inventory analyses and the EPD documents serve as documentation. The positive decision is documented with the signature in the EPD documents.

The documents are signed by:

1. the head of the conformity assessment body (HCAB),
2. the two verifiers of the project.

When signed, the EPD document is the declaration certificate and is officially awarded to the declaration holder.

Any and all ownership rights to the declaration remain with Bau EPD GmbH. In case of violations of the contractually agreed rules and obligations arising from the MS-HB and the pertinent applicable documents, the declaration certificate may be withdrawn.

The usage agreements for declaration documents, marks and logos according to the MS-HB, M-Doc 03 and M-Docs 04 and 04a apply.

7.8 Directory of certified products, publication of EPD documents

A directory of EPDs can be found in the content management system on the www.bau-epd.atwebsite. Here both valid and expired EPDs can be found.

The publications include the EPD document and its annexes and additional information released by the declaration holder. The life cycle inventory analysis of the production plants, the project report and other evidence do not form part of public communication.

7.9 Surveillance

Surveillance is not provided in principle, the validity of the declaration according to EN 15804 expires after 5 years. Renewal/re-issuance requires a new application. Subject-related surveillance only takes place if, for example, annual proof of energy consumption data must be provided, i.e. the customer declares an electricity mix that is better than the national average electricity mix.

7.10 Changes that affect certification

Any changes that do not come from the sphere of the declaration holder (changes to the standards EN 15804, ISO 21930 or ISO 14045 or subordinate PCR documents) will be communicated to the client by Bau EPD GmbH as soon as the regulations are published. An adjustment is necessary when the validity of the EPD expires.

For changes from the sphere of the declaration holder that affect any indicator by more than 10%, there is an overview of the obligation to report in M-Doc 03. This may concern production processes, raw material mixes or energy consumption data, among other things, and make re-issuance necessary.

7.11 Termination, restriction, suspension or withdrawal of certification

An EPD loses its validity over time, i.e. when the data becomes obsolete. Likewise, it loses its validity if any changes occur as described above. After 5 years at the latest, the validity ends, with obsolete data repeatedly being used in the market to a limited extent as long as there are no updates or alternative specific data. Publishing in the “invalid EPDs” section on websites and databases makes sense for users for several reasons (they are frequently still more appropriate than generic data). A restriction of the validity can also arise with regard to the geographical representativeness (delivery radius changes).
A longer-term suspension due to changes is tantamount to a withdrawal of the declaration, which requires re-issuance on a new data basis. Withdrawal can occur, among other things, if the reporting obligations regarding changes in operation are not made in a timely manner, the energy consumption data are not regularly transmitted or the agreed fees are not paid.

In the event of a withdrawal, the EPD will be given an expiration date and moved to the “invalid EPDs” section, and the declaration holder will be obliged to adjust further communication to this fact.

7.12 Records

Confidential retention of records is governed by the MS-HB. In particular, the verification reports including checklists, the signed EPD documents as well as annual proofs of energy consumption agreements must be stored by the programme operator for at least 10 years.

7.13 Complaints and appeals

The procedure is regulated in M-Doc 35 “Management of appeals and complaints”.