RULES FOR THE VERIFICATION OF THE ENVIRONMENTAL PRODUCT DECLARATION

Valid from July 2022

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CHAPTER 1 – GENERAL

1.1 SCOPE

This Regulation defines the procedures applied by RINA Services S.p.A. (hereinafter RINA only) for the verification or pre-certification of the Environmental Product Declaration (hereinafter EPD) and the procedures for requesting, obtaining, maintaining and using, as well as the possible suspension and revocation of such validation in accordance with the rules established by EPD International AB.

RINA validates EPDs based on a Life Cycle Assessment (hereinafter LCA) in compliance with the requirements specified in the ISO 14040 and ISO 14044 standards.

The EPD can be developed for any type of product and must not contain comparative statements between products. Similar product groups or service types can be included in the same EPD. Products / services are considered "similar":

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

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

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

Access to certification is open to all organisations and is not affected by their membership or lack thereof to any association or group.

For the certification activity, RINA applies its current tariffs, guaranteeing fairness and uniformity of application.

RINA can legitimately not accept certification requests concerning organisations subjected to, or whose production or activities are subjected, to restrictive, suspensive or interdictory measures by a public authority.

As part of the application of this Regulations, RINA does not provide consulting services to the Organisations.

1.2 OVERALL

The verification system provided for in this Regulation constitutes an application of the ISO 14025 standard for type III environmental declarations and evaluates:

- the conformity of the LCA of a well-defined product, made in identified production sites and with a specific production process, to the Product Category Rules (hereinafter PCR) of reference, to the EPD International document "General Program Instructions for the International EPD System (hereinafter GPI)"[1] and to the ISO 14040 and ISO 14044 standards.
- compliance of the EPD, based in turn on the results of the LCA, with the requirements set out in the GPI document and in ISO 14025 for the purpose of issuing the validation itself.

The verification of an Environmental Product Declaration takes place according to the paths described below:

- VERIFICATION of the EPD: may be requested by an organization if the PCRs relating to the product / service have already been approved and registered by the Competent Authority (EPD International), in accordance with the GPI document.
  The EPD verification presupposes subsequent surveillance activities, usually on an annual basis, which guarantee the maintenance of the conditions that allowed the initial release of the validation.

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

- PRE-CERTIFICATION of the EPD: it can be requested from RINA by an organization in the event that the PCRs do not exist or are being processed.

  The pre-certification has a limited duration in time and a maximum of one year. Subsequently and once the related PCRs have been approved by the Competent Authority, the Organization can request RINA to verify the already pre-certified EPD.

  In the case of pre-certification, these verification activities are carried out by RINA in the absence of PCR or possibly taking into account PCRs that have not yet been approved and registered, as long as they comply with the requirements specified in the EPD International GPI document.

  Therefore, in the case of pre-certification, the verification methods may differ from the general validation process in terms, for example, of the required documentation, of the requirements that the LCA study must meet, etc.

- EPD Process Certification: it can be requested from RINA by an organization in the event that it wishes to verify an internal organisational process aimed to develop EPDs based on the GPI and valid PCRs covered under the scope of certification.

1.3 INTERVENTION OF ACCREDITATION BODIES

The body that guarantees the certifications issued by RINA (Accreditation Body) may request the participation of its observers in the audits carried out by RINA itself, in order to ascertain that the evaluation procedures adopted by RINA comply with the rules applicable to it, for the certifications subject to accreditation. The participation of these observers is previously agreed between RINA and the Organisation. If the Organisation does not grant its approval to the aforementioned participation, the validity of the certificate is suspended.

1.4 DEFINITIONS

The terminology used in this document conforms to that reported in the standards: ISO 14001, ISO 14020, ISO 14025, ISO 14040, ISO 14044, EN 15804, ISO 14050, EPD International document GPI.

Impact category: categories useful for aggregating the results of the inventory phase of an LCA and expressing them in terms of potential environmental impact.

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

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

Product system: Elementary set of process units connected to each other as regards matter and energy, which pursue one or more defined functions. The term "product" used alone includes not only product systems but can also include service systems.

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

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

Life cycle impact assessment: Phase of the life cycle assessment aimed at understanding and estimating the extent and importance of the potential environmental impacts of a product system.

Non-compliance for EPDs for each topic, complete EPDs and sector EPDs:

- the total absence of consideration of one or more prescriptions of the reference PCR;
- the total absence of consideration of one or more requirements of the EPD International regulatory document;

- the total absence of consideration of one or more prescriptions of the ISO 14040 and ISO 14044 standards;
- a situation that could cause:
- failure to comply with the mandatory regulations for the product;
- failure to comply with one or more requirements of the RINA Regulation for the validation of the EPD;
- a serious deficiency, in the opinion of the GVI on the basis of its experience, in the implementation of the LCA study and / or in the truthfulness of the information contained in the EPD

Major non-compliance 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 control;
- The total absence of one or more requirements of the reference regulatory document of EPD International;
- the total absence of consideration of one or more prescriptions of the ISO 14040 and ISO 14044 standards of the sampled EPDs;
- a situation that could cause:
- failure to comply with the mandatory standards for the product of the sampled EPDs;
- failure to comply with one or more requirements of the RINA Regulation for the validation of the EPD;
- a serious deficiency, in the opinion of the GVI on the basis of its experience, in carrying out the LCA study and / or in the truthfulness of the information contained in the sampled EPD;
- a serious deficiency within the system for creating and issuing EPDs.

Minor non-compliance for EPD process certification:

- a temporary and unsystematic fall of the system for creating and issuing EPDs,
- a situation such as to cause a minor deficiency in the applicable Management System,
- a situation such as to cause a minor deficiency that does not in any case reduce the ability to ensure control of the process and / or product.

Organisation: company, operator, factory, firm, body or association, legally recognised or not, public or private, which has its own functions and administration.

Applicant: the Organisation that requires RINA to issue the Certificate of Conformity.

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

RINA: RINA Services S.p.A.

For any other term used in this Regulation, the definitions of the Standards ISO 14001, ISO 14020, ISO 14025, ISO 14040, ISO 14044, EN 15804, ISO 14050, GPI document, in current editions.

The term product hereinafter means any good or service, regardless of their use or positioning in the production chain.

CHAPTER 2 – CONTRACT REVIEW

2.1 REQUEST

Organizations wishing to obtain the verification or pre-certification of the EPD for one or more certain products / sites, must provide RINA with the essential data of their Organization and related activities and the location of the Site / s, by sending the appropriate form "Informative Questionnaire" compiled in its entirety, available on the website www.rina.org on the basis of which an economic offer is formulated by RINA.

In particular, the Organisation must communicate to RINA:

- 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[2];
- 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).

This information is requested in order to verify, in advance, the application of some requirements of the regulatory document and/or the specific technical reference and to prepare an appropriate economic offer.

Upon receipt of the completed informative questionnaire, RINA carries out a preliminary assessment aimed at preparing the offer:

- check any points of the informative questionnaire not completed or to be clarified with the customer;
- verifies the purpose of the certification with reference to RINA accreditation;
- verifies the expiry of the validity of the reference PCR, if present;
- check the PCR and the corresponding CPC-basic module code, the sites and countries in which the organization operates;
- verifies the type of EPD subject to audit and the number of EPDs and products subject to validation;
- defines an EPD sampling plan in the case of the application of the EPD Process Certification;
- verifies the need for control of the applicable environmental legislation, in the absence of a certified EMS / EMAS;
- check if it is a validation transfer;
- verifies the existence of the resources and skills necessary to carry out the checks on schedule.

2.2 CONTRACT

The Organisations, in case of acceptance of the economic offer, formalize the certification request by sending to RINA the specific form attached to the offer, indicating the normative document and / or the specific technical reference and, if necessary, another normative document of reference, according to which certification is required.

Upon receipt of the certification request and the relative attachments, and after their preliminary examination to verify completeness of the documentation, RINA sends to the Organisation in writing confirmation of acceptance of the request.

The Organisation's request, in which the present Regulation is explicitly referred to, and the relative acceptance by RINA contractually formalize the relationship between RINA and the Organisation and the applicability of these Regulations.

The contract stipulated between RINA and the Organisation includes:

- the initial audit and the issue of the certificate;
- subsequent surveillance and recertification audits.

2 With reference to the construction products sector, report the presence of the conformity to the standard EN 15804 and if it's present of the sub-PCR specific for the construction product subject of analysis, besides the PCR basic module, specific for the construction sector.

CHAPTER 3 - SELECTION AND COMMUNICATION OF THE TEAM

RINA selects the team that performs the activities and the personnel who will carry out the independent technical review, based on the knowledge, skills and competences necessary, taking into account the criteria/requirements of the agreed scheme and each additional element indicated by the supervisory body of the scheme, by the accreditation body/the Competent Authority.

The team is completely independent of all aspects concerning the verification and has not participated in any way to the design of any part of it, in accordance with the procedures approved by the Committee for the Safeguarding of Impartiality.

RINA communicates to the Organisation the name of the technical staff responsible for carrying out the necessary checks for carrying out the necessary verification for the purpose of verifying the EPD; the Organisation can object to the appointment of such technicians, justifying the reasons.

CHAPTER 4 - INITIAL CERTIFICATION

4.1 EXAMINATION OF DOCUMENTS

The Organisation must make available to RINA:

- 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 published is to be sent or (just in case of application of the GPI 2.5), 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);
- copy or brief report of the LCA relative to the product concerned by the EPD;
- copy of the reference PCR (for EPD validation) approved and registered by the Competent Body;
- internal procedures (viewable also during the on site visit) 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;
- procedures (viewable also during the on site visit) 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);
- list of procedures implemented to maintain EPD process certification (only for EPD process certification);
- list of EPD subject to internal validation from which RINA can select some EPDs for spot checks to ensure they comply with the EPD rules (only for EPD process certification);
- list of production sites from which the average data, included in the Sector EPD, have been obtained (only for Sector EPD).

RINA may request, at its discretion, for examinations and other documents, in support of the information previously received, considered important for the certification of the product in question.

The documentation attached to the application is examined to verify compliance with the provisions of this Regulation and the normative documents.

In the event that the documentation is incomplete or not compliant in some part or its attachment, the Organisation is informed.

Any non-conformities found in the documentation must be resolved by the Organization, to the satisfaction of RINA, before continuing the verification process.

In general, the documentary analysis will have to verify:

- that the EPD document and the LCA study are in compliance with the requirements of the GPI and corresponding PCR, including:

- the data used for LCA calculations,
- the way in which the calculations based on LCA were carried out and their compliance with the calculation rules,
- the presentation of the environmental performance in the declaration,
- the submission of further environmental, social and economic information, e
- or any other information contained in the declaration;

- the procedures established for updating the information in the LCA and in the EPD;
- the procedures established for the assessment of compliance with environmental legislation applicable to all relevant processes and to the product (only in the case of a company not certified to ISO 14001 and / or EMAS).

These procedures can also be verified during the on-site inspection.

In particular, for the EPD, it will be verified that:

- the information is presented in a transparent and understandable way;
- the presentation is credible and neutral;
- the format of the declaration follows the ay-out required by the Competent Authority;
- Information and guidance on where to find additional explanatory materials is provided.

In particular, also for the LCA, it will be verified that the data are presented in compliance with the provisions of the GPI.

Following the positive outcome of the evaluation of the documentation, the timing and procedures for the checks to be carried out on the production site for the release of the validation of the EPD will be agreed with the applicant.

4.2 AUDIT ACTIVITY

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

To assess the compliance of the product with the information contained in the LCA and EPD, the correct evaluation and definition of:

- 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.

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 audit.

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

The Organization, where it is not already ISO 14001 and / or EMAS certified, must 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 organization is required to ensure access to documents, products and sites for conformity assessment, including any subcontractors.

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

- an initial meeting with the Organization's technicians to agree on the purposes and methods of the visit itself;
- an inspection of the production site (s) where the product covered by the EPD is manufactured;
- the assessment of the compliance of the product with the contents of the LCA (s) and of the EPD (s) in question;
- the assessment of the environmental legislation applicable in the case of companies that are not ISO 14001 and / or EMAS certified.
- a final meeting to illustrate the outcome of the exam.

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

4.3 AUDIT REPORT

At the end of the on-site visit, a copy of the audit report is delivered to the Organization, on which, among other things, any non-conformities and / or recommendations found are reported. The Organization may raise any reservations or observations on the non-conformities or findings expressed by RINA technicians.

4.4 MANAGEMENT OF NON-CONFORMITIES

The Organization, after analysing the causes of any non-conformities reported in the above report, must propose to RINA, by the date indicated on the report itself (where present), the necessary treatments of the non-conformities (and / or deviations, where foreseen) as well as the necessary corrective actions and the times foreseen for their implementation.

The acceptance of these proposals and the expected timeframe for their implementation is communicated in writing by RINA to the Organization.

For the continuation of the EPD verification process for each topic, complete and sector, it is necessary that all non-conformities found are positively resolved by the organization and accepted by the Team Leader of the verification group.

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

The findings regarding the Environmental Product Declaration document, regardless of whether they are classified as non-conformities and / or recommendations, must still be resolved by the Organization for the continuation of the validation or pre-certification process.

In the event of non-compliance with the reference standards, the verification process is suspended.

In such cases, an additional check must be carried out within 6 months in order to ascertain the correct application of the proposed corrective actions; upon successful completion of this verification, the EPD validation process is resumed.

If the 6-month deadline is exceeded without it being possible to have feedback on the application of the proposed corrective actions, the LCA and the EPD will be subjected to a complete review within a period of 12 months from the date of the survey.

After the aforementioned 12-month period without a 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 Organization that wishes to continue with RINA certification will have to repeat the entire validation process by submitting a new request.

All expenses related to any additional audits resulting from deficiencies in the System / Process / Product covered by certification are to be considered borne by the Organization.

4.5 INDEPENDENT TECHNICAL REVIEW

In caso di esito positivo della verifica, la documentazione prodotta dal gruppo di verifica viene sottoposta ad una verifica tecnica indipendente. Il tecnico incaricato di effettuare tale verifica finale sulla documentazione predisposta dal gruppo di verifica può sollevare ulteriori richieste di chiarimento o modificare la classificazione di uno o più rilievi individuati dai verificatori.

La conferma dell'approvazione da parte di RINA della EPD è inviata per iscritto all'Organizzazione.

Nel caso di eventuale decisione di non convalida della EPD, RINA provvede a darne comunicazione scritta all'Organizzazione indicando le relative ragioni. L'Organizzazione è tenuta al pagamento delle attività di verifica previste da offerta accettata, anche in caso di esito negativo dell'iter certificativo.

4.6 FINAL PROVISIONS

At the end of the independent technical review, RINA will issue a final verification report in English to the organization. A single verification report can be used for multiple EPDs verified together on the basis of the same PCR.

The Verification Report must be dated and signed by the independent reviewer and documents the verification process in compliance with the data confidentiality rules.

The verification report must be submitted during the EPD registration and be available to anyone who requests it. The date of the audit report (the "approval date") forms the basis for the validity period of the EPD.

Further certificates or certificates resulting from national or international agreements of RINA with other certification bodies may also be issued, at the customer's request, for the purpose of mutual recognition of the EPD validation.

Following the validation or pre-certification of the EPD by RINA, the Organization will be responsible for directly requesting its registration with EPD International and its subsequent publication on the website www.environdec.com.

Organizations certified under EPD process certification must submit an audit report based on the evaluation of the EPD document during EPD registration. The verification report must allow identification of the pre-verified tool and provide the version of the tool if used for EPD development.

CHAPTER 5 - MAINTENANCE OF THE EPD

5.1 OVERALL

During the period of validity (five years) of the EPD, the Organization must maintain unchanged the conditions that allowed the granting of the validation itself.

In particular, the validity of the registration is subject to the fact that the organization keeps under control, according to procedures previously examined by RINA, the various parameters that formed the basis of the LCA and of the EPD process certification (the latter only in the case of EPD process certification).

During the period of validity of the EPD, RINA periodically carries out surveillance checks, in order to ascertain continued compliance with the requirements that led to the issue of the validation itself.

The surveillance could be carried out on a documentary basis or in the form of an on-site audit, or as a mix of both activities. In the event that the organization does not provide the necessary documentary evidence required by the GVI to carry out the assessment or in the event that the

organization notifies RINA significant changes to the production process, an audit will certainly be carried out on the organization's website.

The periodic surveillance activities, both of a documentary nature and possibly verification on the site, are established in the opinion of RINA on the basis of the type of product and are mainly aimed at verifying:

- the effective application of the procedures relevant to the EPD system / EPD process certification;
- the correct acquisition and updating of data;
- the assessment of the main environmental aspects as part of the LCA calculations;
- the continuous compliance of the product with the information contained in the EPD.

The manner and frequency with which the surveillance activities will be carried out, as well as the documentation that the Organization must make available upon request, will be detailed to the Organization together with the communication of the validation of the EPD.

In the presence of the data collection and updating procedure that allows to guarantee the updating of the data on an annual basis in order to identify any changes such as to entail the need to reissue the EPD document during the period of validity of the document itself, the Organization may opt to have RINA carry out the surveillance checks "on call", or RINA will carry out the inspection check only in the event that the company, in carrying out the annual update, on the basis of its data collection and updating procedure , you find the need to reissue the EPD document and therefore contact RINA to carry out the verification.

Therefore, it is the organization's responsibility to apply its data collection and update procedure and act accordingly during the period of validity of the EPD document.

The customer can choose this option by filling in the appropriate "customer request" form, upon acceptance of the offer.

For this option to be valid and become operational, the procedure must be verified and approved by RINA during the EPD validation check.

In the case of audits performed "on call" during the period of validity of the EPD, the organization is required to pay only the amount of the audits carried out.

No updated EPD document can be issued without RINA's approval.

The "on call" verification option is not applicable to EPD process certification.

For the purposes of carrying out the controls described, RINA technicians must be guaranteed free access, during normal working hours, to the premises and archives of the production site (s) of the product subject to the EPD.

The names of the qualified technicians appointed to carry out the audit are previously communicated by RINA to the Organization, which may object to their appointment, justifying the reasons.

5.2 MAINTENANCE AUDIT

The procedures for carrying out the maintenance audit follow those provided for the verification.

The organization has 3 months to take charge of the NC. In case of no reply within the aforementioned term, the validity of the EPD is suspended.

Upon successful completion of the independent technical review, RINA notifies the company of the successful outcome of the surveillance activity, and in case of need to reissue the EPD document, it reissues, revalidates and sends the EPD document to the organization.

The request for publication of the updated version of the EPD document on the EPD International website to replace the previous one is the responsibility of the organization.

During the surveillance phase, RINA also reserves the right to request further documentation useful for carrying out the necessary investigations.

If the Organization is equipped with an Environmental Management System, certified by RINA according to ISO 14001 and / or EMAS and valid, the above checks may take place simultaneously with the periodic checks carried out on the Management System.

The Organization must also keep a record of any complaints received regarding the product and the environmental impacts associated with it and other events that could potentially have negative effects on the environment, as well as any observations or reports received from the national or local authorities in charge. control and related corrective actions undertaken by the organization and must keep these records available to RINA.

On the occasion of the audits, RINA may request, for its archive, an extract of the aforementioned documentation in order to have evidence of the document structure in force at the time of the audit.

5.3 AUDIT REPORT

For the methods of communicating the audit outcome, please refer to the previous point 4.3 AUDIT REPORT.

5.4 MANAGEMENT OF NON CONFORMITIES

In addition to the cases of suspension provided for in the general conditions of the contract, in the event of non-compliance, the company has 3 months to respond to such non-conformities by sending the relevant documentation revised documentation, in case of no response within the aforementioned term, the validity of the EPD will be suspended.

5.5 ADDITIONAL CHECKS

RINA also reserves the right to carry out additional inspections following reports received from the parties concerned to RINA and considered particularly significant in relation to the failure to comply with the criteria set out in the reference standard and / or these Regulations.

In case of refusal, without valid reasons, by the Organization, RINA can start the process of suspension of the validation.

If the complaints and reports are deemed justified by RINA, the cost of carrying out the additional audit is borne by the Organization.

The Organization must keep records of any complaints relating to the products covered by the certification and the related corrective actions taken, and must make them available to RINA together with the corrective actions taken during the periodic audits, where and as applicable.

5.6 EXTRAORDINARY INFORMATION FROM 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:

- modifications of the product (design, materials, dimensions, etc.) and consequent variation of the environmental impacts even of a single category;
- changes in the process (characteristics of the production process, technologies used, internal to the Organization or a supplier) with consequent variation of the environmental impacts even 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 Organization undertakes to promptly notify RINA of these changes in writing, together with the necessary considerations and assessments of the Organization on any changes in the environmental impact of the product for each category defined in the GPI document of EPD International and possibly in the reference PCRs .

The Organization must assess the influence that such modifications may have on the LCA of the product previously carried out and consequently on the contents of the validated EPD, and must communicate this information to RINA.

The organization is required to always comply with the requirements for validating the EPD even in the event of changes communicated to RINA.

In particular, the EPD document must be reissued in the event that one of the environmental indicators has worsened by more than 10% compared to the data currently published.

RINA reserves the right to ask the customer for more information that can prove how the Organization has reacted in relation to the above and any further additions.

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

5.7 REISSUE OF DOCUMENTS

In case of cancellation of a new EPD document, the differences with respect to the previous version of the EPD document must be indicated.

In particular, an EPD must always be updated and re-checked during its validity period in the event that there are changes in technology or in other circumstances that lead to:

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

If these changes have occurred without the EPD having been updated, the organization will have to contact the Secretariat of the International EPD System to have the EPD de-registered.

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

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

This verification can 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 verification of the issue of the EPD document, even if the PCR has expired, the revised EPD will maintain its original period of validity;
- If the verification is conducted on the current version of the GPI and corresponding current and valid reference PCR, the verification will have to 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 changes made, RINA reserves the right to request a revision of the LCA and the EPD related to it and to carry out additional visits which may be documentary and/or at the Organization, aimed at verifying whether the conditions for the maintaining the validation of the EPD.

If these conditions do not exist, RINA will inform the Organization in writing about the need for a new issue of the revised EPD (s).

A copy of the documentation relating to each revision of the LCA, of the EPD and of the procedures prepared for updating the information and for the implementation and maintenance of the EPD process certification must be made available to RINA for examination during the audit.

The Organization is required to communicate to RINA its intention to renounce validation or to proceed as an alternative to its renewal in accordance with the provisions of CHAPTER 6 – RENEWAL OF THE EPD.

RINA will notify the company of the revocation of the validation.

CHAPTER 6 – RENEWAL OF THE EPD

6.1 OVERALL

The registration of the EPD has a predetermined duration, called the "review period", at the end of which the EPD must undergo a renewal validation process. The review period always lasts up to a maximum of 5 years for EPDs.

At the expiry of the validation, the Organization must communicate, approximately three months before the expiry date itself, its intention or not to renew the validation of the EPD, following the procedure described in CHAPTER 4 - INITIAL VERIFICATION and attach to the the documentation mentioned therein is requested, limited to the variations that have occurred with respect to the one presented for the previous validation.

In any case, it must be sent to RINA:

- the final and updated report of the new LCA (s);
- copy of the new EPD (s) to be verified;
- procedures established to assess compliance with the environmental legislation applicable to the product and the relevant production processes (only in the case of a company not certified ISO 14001 and / or EMAS), also verifiable on site.

6.2 RECERTIFICATION AUDIT

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 of a verification visit to be carried out, as a rule, with the same criteria as the first validation visit.

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

Upon successful completion of the document review, a new visit to the production site will be carried out with the same criteria indicated in chapter 4.2 AUDIT ACTIVITY, in order to verify, among other things:

- the correctness in general of the information contained and updated in the LCA and in the EPD;
- the application of the procedures set up for updating the data used for the LCA and for carrying out the revision of the EPD;
- the conformity of the characteristics of the product to what is declared by the Organization in the EPD;
- the presence of any significant variations concerning the product or the production process of the product covered by the EPD;
- the assessment of the environmental legislation applicable in the case of a company that is not ISO 14001 or EMAS certified.

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

The dates for carrying out the verification visits will be agreed with the Organization well in advance and officially confirmed to it at least one week before the visit itself.

Failure to periodically validate the EPD will be notified in writing by RINA by registered letter to the Organization and sent for information to the accreditation body and to EPD International, for the resolutions of their competence.

If the product has obtained the EPD validation by another accredited Certification Body, and requires subsequent validation from RINA, the transfer of the validation will be possible as long as the following conditions are met:

- the Organization interested in obtaining recognition of the validation by RINA must have sent the information questionnaire for the purpose of drafting the economic offer for the transfer;
- the validation of the Organization is issued by an accredited body for the EPD or EPD verifier recognized 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 / s / service / s covered by the EPD document fall within the accredited scope of RINA, as well as the type of EPD (complete EPD, for each topic, sector, EPD process certification).

In particular, the Organization must provide RINA with a copy of the validated EPD (s) and complete the Validation Request form and the Information Questionnaire as indicated in chapter 2.1 REQUEST of these Regulations.

If these conditions are met, the EPD validation is transferred while maintaining the expiry of validity of the EPD document or certificate (in the case of the EPD process certification) provided for by the previous certification body and with it the annual surveillance.

Organizations in possession of EPD validations not covered by the accreditation and / or the above prerequisites must be treated as new customers following the validation process provided for in CHAPTER 4 - INITIAL CERTIFICATION.

6.3 AUDIT REPORT

For the methods of communicating the outcome of the audit, refer to the previous point 4.3 AUDIT REPORT.

6.4 MANAGEMENT OF NON-CONFORMITIES

For the procedures for managing the findings, please refer to the previous chapter 4.4 MANAGEMENT OF NON-CONFORMITIES.

6.5 INDEPENDENT TECHNICAL REVIEW

For the methods of carrying out the independent technical review, please refer to the previous chapter 4.5 INDEPENDENT TECHNICAL REVIEW.

CHAPTER 7 - MODIFICATION OR WAIVER OF EPD REGISTRATION

The Organization, which intends to renounce the EPD, must notify RINA in writing of its intention not to renew the registration of the EPD or that of the EPD process certification.

The Organization may request a modification or an extension or reduction of the scope of the EPD by submitting a new validation request. RINA reserves the right to examine the requests on a case-by-case basis and decide on the evaluation methods for the purpose of issuing a new audit.

The changes communicated by the organization can be checked by means of additional checks which can only be documentary or on site or by means of new validations. In particular, in the event of changes to production processes or extension to new product groups, an on-site inspection will be carried out. The organization has 3 months to take charge of any NCs that may have emerged following these checks. In case of no reply within the aforementioned term, the validity of the EPD is suspended.

The outcome of these checks is reviewed for approval by an independent technical reviewer for the EPD. Upon successful completion of the assessment, the EPD document is revalidated and reissued. The Organization will have it republished on the EPD International website, replacing the previous one.

With the exception of the case in which RINA carries out the surveillance verification activity "on call" by the company, if the organization does not carry out the activities for maintaining the EPD validation (CHAPTER 5 - MAINTENANCE OF THE EPD of the these regulations) and consequently RINA is unable to carry out the surveillance activities, the procedure for revoking the validation will be started.

The Organization will receive a letter of notice of the start of the revocation process and subsequently the letter of revocation of the validity of the validation.

The revocation of the validation makes it impossible for the Organization to use the EPD logo and to advertise its product as the holder of the EPD validation.

RINA will communicate to EPD International and to the accreditation body the information relating to the previous points for the resolutions of their competence.

CHAPTER 8 – TYPES OF EPD VERIFICATION

8.1 PRE-CERTIFICATION

An Organization that wants to access the EPD validation scheme for a product category for which the reference PCRs have not yet been created and registered with EPD International, can request RINA to access the so-called "pre-certification" according to what provided for by the GPI.

The main purposes of the pre-certification are:

- facilitate the preparation process of the PCRs themselves;
- facilitate the process of involving interested parties;
- provide the Organization with a first communication and marketing tool regarding the environmental performance of its product.

The activities carried out by RINA aimed at issuing the pre-certification follow the procedure described above for EPD validation, except as otherwise specified below.

If the Organization requires pre-certification, the following conditions apply:

- the pre-certification is issued to those product categories for which the reference PCRs have not been developed and registered;
- it is valid for one year only, not renewable;
- for the purpose of obtaining pre-certification, the Organization must produce an LCA in the manner prescribed by the GPI document in force;

The contents and format of the pre-certified EPD follow those established for the validated EPD; in addition to the pre-certified EPD the following information must be present:

Additional information on the LCA methodology and data used, including:

- functional unit or declared unit;
- system boundaries;
- cut-off rules;
- allocation rules;
- sources of data;
- an explanatory statement regarding pre-certification.

The period of validity of the pre-certification is agreed between RINA and the Organization and cannot in any case exceed the duration of one year.

For anything not specified above regarding obtaining the pre-certification, please refer to the provisions of the GPI of the EPD International.

8.2 SINGLE THEMATIC EPD

In the case of the EPD for each topic, it is necessary to send RINA the information provided for in chapter 4.1 EXAMINATION OF DOCUMENTS.

The EPD for each topic is an environmental product declaration focused on only one of the environmental impact categories that is indicated within a complete EPD. (e.g. EPD which shows only the indication of the impact relating to the greenhouse effect - climate declaration).

The EPD for each topic can only be created in the presence of a published EPD and must contain at least the following information:

- information about the product;
- information about the organization;
- declaration of the environmental impact for the chosen content relating to the impact category for the various stages of the life cycle;
- mandatory declarations referred to in section 9 of the GPI.
- information on how to obtain information on the complete environmental impact of the declared product
- the declaration provided for in paragraph 6.4.2 of the GPI.

8.3 EPD PROCESS CERTIFICATION

In the case of EPD process certification, it is necessary to send the information referred to in chapter 4.1 EXAMINATION OF DOCUMENTS to RINA. From the list of EPDs validated internally by the company, RINA will sample some EPDs and will request the submission of the documentation relating to the LCA studies and the EPD documents of the selected products. The certification lasts five years, with renewal at the end of the fifth year.

The on-site verification will be aimed not only at what is provided for in chapter 4.2 AUDIT ACTIVITY for what concerns the EPDs selected on a sample, but also at verifying the correct and effective application of the procedures implemented by the company for maintaining the validation process. of the EPDs created in accordance with the provisions of the GPI document of the EPD International. The verifications in the case of EPD process certification always include an on-site inspection at the head office and at the operational site (s) of the EPDs sampled.

8.4 SECTOR EPD

For the validation of the sector EPD, RINA will view a representative sample of the production sites from which the average values of the data used to carry out the LCA study were calculated. This sample will take into account any significant process differences between production sites.

CHAPTER 9 - ADVERTISING - USE OF THE EPD REGISTRATION LOGOTYPE

The methods of use of the EPD, of the related logo are governed by a specific agreement between the Organization and the EPD International.

In general, the following applies:

- the EPD must not be used and disclosed before its approval and registration by the Competent Body;
- the advertising carried out by the Organization must be truthful and must not give rise to doubts or false interpretations on the type, category, characteristics and environmental performance of the product concerned;
- it must also be drafted in such a way as to avoid misunderstandings between products to which the EPD validation has been issued and the others;

- the EPD must be used by the Organization exclusively for the type of product for which the validation was issued;
- any use of the EPD or the EPD logo that could generate confusion with other type I labelling systems (ref. ISO 14024) is prohibited;
- the EPD logo can be used on the products covered by the EPD and / or on their packaging as long as together with the website www.environdec.com, the registration number and possibly the CPC code of the product or with an explanation of what the EPD is;
- the EPD logo can be used on information material indicating that the information is taken from the EPD and using the EPD logo together with the registration number and website (www.environdec.com) for more information. It may also be useful to refer to the CPC code of the product or an explanation of what the EPD is.

More generally, the organization is required to comply with the requirements set out within the GPI.

RINA will check the above during the periodic visits.

CHAPTER 10 – CONTRACTUAL CONDITIONS

For anything not provided for in this document, refer to the "GENERAL CONDITIONS OF CONTRACT FOR THE CERTIFICATION OF SYSTEMS, PRODUCTS AND PERSONNEL", available on the website www.rina.org.

Publication: RC/C 03
English Edition

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Technical Rules