



GENERAL PROGRAMME INSTRUCTIONS

Version 2.0

Issue date: 17.08.2021

EPD Programme - EPD Ireland
Programme Operator - Irish Green Building Council

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Revisions

Revisions to Version 1.0 – 29/06/2018 – Comprehensive changes to the fee structure in 6.3. This includes introduction of fee structure for multi variation EPD.

Version 2.0 -17/08/2021 - update to accommodate the publication of EN15804+A2:2019

1.0 Introduction

This document sets out how the EPD Ireland programme will be run in compliance with ISO 14025¹. It also intends to follow the requirements of the Eco Platform² audit checklist for EPD programme operators. The document sets out the procedures for the EPD Ireland programme, the process for developing EPD, independent review and verification of Environmental Product Declarations (EPDs), the independence and competencies of verifiers and other rules pertaining to the quality and independence of EPD, in line with the requirements of ISO 14025. This is a living document which may be developed further as the EPD Ireland evolves. The EPD Ireland programme has been developed with the financial support of the Environmental Protection Agency's (EPA) Green Enterprise programme.

The Irish Green Building Council (IGBC) is the operator of and secretariat for EPD Ireland. EPD Ireland is a programme and where it is referred to as providing a service or action, this should be taken as referring to its secretariat namely IGBC.

2.0 General programme overview

2.1. Scope of the EPD Ireland programme

The scope of the EPD Ireland programme is any products permanently installed in the construction, refurbishment, fit out of buildings, and in any built infrastructure, such as road, rail and waterworks. This may include products which may be outside the scope of I.S.EN 15804³ such as certain furniture and electrical equipment items which are installed within buildings.

2.2 Programme Objectives

The programme intends to encourage the development and use of Type III 3rd party verified EPD in the construction sector. The objectives of the programme are to:

- Create visibility for EPD in Ireland and increase the level of awareness around Life Cycle Assessment (LCA).
- Encourage architects, engineers and other construction professionals to specify products with transparent environmental declarations.
- Encourage the use of EPD in building level life cycle assessment to EN15978⁴ to support the reduction of environmental impacts at all stages of the building life cycle.
- Encourage suppliers to promote their transparent environmental declarations.
- Encourage manufacturers to carry out LCA on their products, develop transparent declarations, and innovate to reduce the environmental impacts of these products.
- Build the professional capacity within Ireland to carry out Life Cycle Assessment, verification of EPD, participation in national and international technical committees.

¹ ISO 14025 Environmental labels and declarations - Type III environmental declarations - Principles and procedures (ISO 14025:2006,IDT)

² Ecoplatform is a group of EPD programme operators seeking to harmonise the development of EPD in Europe. <http://www.eco-platform.org>

³ In this document, references to EN15804 without a version number indicate that the reference is valid for both I.S.EN15804+A1 and I.S.EN 15804+A2 until their respective expiry dates

⁴ EN 15978 Sustainability of construction works- Assessment of environmental performance of buildings- calculation method.

2.3 Programme Administration

2.3.1 Secretariat

The Irish Green Building Council (IGBC) will operate the programme, to be known as EPD Ireland and act as administrator. It will carry out the following duties.

- Develop and communicate the General programme instructions
- Ensure that the General programme instructions are adhered to.
- To put in place quality assurance procedures with its own staff to ensure consistency and conformity in the management of the programme.
- Monitor changes in procedure and documents and modify programme instructions as necessary.
- Ensure appropriate consultations with interested parties to maintain the credibility of the programme.
- Put in place a procedure to safeguard data handling.
- To guide and oversee the development of the Product Category Rules (PCR) documents
- To ensure the consistency in the verification of EPD by providing verification reports and checklists.
- To ensure consistent communication of EPD by providing a common template for use.
- To oversee the appointment of competent verifiers.
- To decide whether to accept an EPD for publication based on the verification, report and other documentation.
- To manage the day-to-day appointment of verifiers for verification of EPD when contacted by manufacturers.
- To manage payment system for registration of EPD
- To manage the website of the programme and database for EPD www.epdireland.org
- To manage the membership of the technical committee.
- To liaise with international organisations with common aims to improve the quality and comparability of Type 3 labels such as Eco Platform, the European organisation of EPD programme operators.

2.3.2 Technical committee

A technical committee (TC) will be made up of at least 3 EPD/LCA experts to advise the secretariat on the technical aspects of the programme. A chair will be chosen by the membership of the technical committee. EPD Ireland will maintain the level of expertise by encouraging all available expertise in Ireland to participate. It will ensure the independence of the TC by ensuring a mix of organisations are represented on the TC. If necessary international expertise will be included. The technical committee will be open to any experts in LCA or EPD verification who may apply for inclusion on the committee directly to EPD Ireland. As expertise develops in Ireland EPD Ireland may limit the numbers participating in the Technical committee based on level of expertise, but will ensure rotation of membership whilst maintaining continuity. This may include setting a time limit on membership of between 3 and 5 years.

2.3.3 Verifier Approval Committee.

The Verifier Approval Committee (VAC) is a sub-committee of the Technical Committee and will comprise of at least two LCA experts and a chair from the EPD Ireland secretariat. The LCA experts are not required to be verifiers but are qualified to assess the competency of applicants.

The VAC will assess the competencies of the applicant based on the criteria set out in Section 4.2 Competencies of verifiers and PCR reviewers – of this document. They will complete the Annex D– Verifier application form and assessment sheet and submit a recommendation to the Secretariat.

2.3.3 Programme compliance standards

The programme is designed to comply with the following standards:

- ISO 14025 Environmental labels and declarations - Type III environmental declarations - Principles and procedures (ISO 14025:2006, IDT)
- ISO 14027⁵ Environmental labels and declarations — Development of product category rules
- I.S.EN 15804:2012+A1⁶ - Sustainability of construction works - Environmental product declarations - Core rules for the product category of construction products, until its validity expires
- I.S.EN15804:2019+A2⁷ - Sustainability of construction works - Environmental product declarations - Core rules for the product category of construction products
- Irish Standard Recommendation S.R. CEN/TR 16970:2016⁸ - Sustainability of construction works Guidance for the implementation of I.S. EN 15804:2012+A1

2.3.4 Quality Assurance procedures for programme

IGBC sets out the overall quality assurance standards, procedures and practices for its certification and verification programmes, in its Staff handbook – Annex A – Procedures for Quality Assurance of Certification & Verification programmes. This is intended to ensure that all employees of IGBC are familiar with the procedures and are aware of all the documents and procedures relevant to the different programmes. This sets out:

1. Quality assurance and review periods
2. Help desks, recording of queries and clarifications
3. Role of Technical Committees
4. Role of checklists and Audit procedures – Including version control of key documents
5. Role of external Auditing bodies
6. Quality control of assessors and verifiers
7. Complaints and Appeals

⁵ ISO 14027⁵ Environmental labels and declarations — Development of product category rules

⁶ I.S.EN 15804:2012+A1⁶ - Sustainability of construction works - Environmental product declarations - Core rules for the product category of construction products

⁷ I.S.EN15804:2019+A2 - Sustainability of construction works - Environmental product declarations - Core rules for the product category of construction products

⁸ Irish Standard Recommendation S.R. CEN/TR 16970:2016⁸ - Sustainability of construction works Guidance for the implementation of EN 15804

2.4 Legal liability for EPD.

Notwithstanding all of the above and the verification of an EPD by the EPD Ireland programme, the manufacturer remains the sole owner of the EPD and remains fully liable and responsible for the EPD and all statements and data therein. This is in accordance with I.S. EN 15804⁹ clause 5.5

2.5 General Programme Instructions – Revision period.

The General programme instructions will be reviewed every two years or whenever a changes are required to remain current with changes to relevant ISO and EN standards.. The latest General Programme Instructions will always be published on the EPD Ireland website, with the version number and date.

3.0 Process for Developing an EPD

3.1 Process for the manufacturer

A company can develop an EPD by itself, if it has sufficient internal expertise, otherwise an LCA/EPD expert should be used.

Companies that wish to prepare an EPD for registration and publication shall:

- collect LCA data and other relevant environmental information according to the general programme instructions and relevant PCR document.
- process LCA information that will be needed for EPD.
- prepare an LCA report to be provided to the EPD Ireland programme verifier which will remains confidential.
- notify EPD Ireland of their intent to have the report verified as an EPD.
- pay the prescribed fee to the independent verifier appointed by EPD Ireland before verification concludes and irrespective of verification outcome.
- have independent verifier prepare a verification report in accordance with the EPD Ireland template, completed the prescribed verification checklist, and submit with verified EPD prepared in accordance with the EPD Ireland template, to EPD Ireland programme.
- pay the EPD Ireland registration and publication fee to have EPD Ireland published on EPD Ireland platform. www.epdireland.org
- give notice to EPD Ireland of withdrawal or modifications to the EPD.
- Will give notice of technical changes to production which may impact on the EPD, eg changes of technology, changes of electricity certification or supplier, change of supplier where their EPD has been used.

3.2 The EPD Verification Procedure

The verification of EPD is the verification of LCA based data, additional environmental information and the information given in a single EPD according to the General programme instructions and a valid reference PCR. The verification must be carried out by a recognised verifier appointed by the EPD Ireland Programme. The scope of EPD Ireland is construction products and all EPD must comply with I.S. EN 15804. It is mandatory to use the verification checklist /report template available in Annex B

⁹ In this document, references to EN15804 without a version number indicate that the reference is valid for both I.S.EN15804+A1 and I.S.EN 15804+A2 until their respective expiry dates

3.3 Rules for data confidentiality

EPD Ireland recognises the importance of data confidentiality to protect intellectual property rights, and competitiveness of the manufacturer. Confidential data is not made public. The declaration only provides data aggregated over the full or relevant parts of the life cycle. Data that is identified as confidential that is provided during the verification process shall be kept confidential. Verifiers shall not disseminate or retain for use any information disclosed to them during the course of the verification other than for the purpose of maintaining the EPD.

IGBC has an internal policy for data confidentiality that is accessible at the following link:
<https://www.igbc.ie/privacy-policy/>.

IGBC has updated its internal procedures to comply with the General Data Protection Regulation which came into force on 25th May 2018. This will ensure that all data retained from the programme will be secure and protected.

3.4 Validity period of EPD

The period of validity for an EPD is set in the PCR. This is set at five years for construction products compliant with I.S. EN 15804 after which the EPD should be revised and reissued. If there is no significant change to the underlying data, then the EPD does not need to be re-calculated, but should be reissued. A significant change is deemed as a change in the underlying data for any of the parameters of the EPD of greater than +/-10%

3.5 Corrections or amendments to existing EPDs

An organisation may need to correct or amend information in its EPD during the period of validity. This may be due to a change in the technical properties of the product or input data, which would substantially affect the results of the EPD. In such cases new inventories and calculations must be provided.

The EPD owner should provide notice to EPD Ireland of the intention to modify the EPD. The original verifier if available will carry out a check on the changed information for an agreed time-based fee. A notification of changes in the declaration will be issued by the verifier to EPD Ireland. A revision number will be given for the revised EPD. All changes from the previous version of the EPD will be noted and explained in the revised EPD.

3.6 Use of pre-verified tools

Pre-verified tools are often developed by trade organisations to assist their members to develop their own EPD and usually include a standard template for the product type. These reduce the time needed to develop EPD from scratch as most of the inputs are already verified and only require specific inputs related to the producers' own data. These usually reduce verification time considerably. Where the tools have already been verified within Europe by an ECO Platform member programme, in principle these will be accepted for use on a case by case basis provided there is proof of verification through a programme. However the EPD produced using the tool must still be verified with the verification fee based on the time needed for the verification based on the hourly rate assuming that there is greatly reduced time to verify.

4.0 Procedure for review and independent verification

For an EPD to be credible, it must be verified by an independent and competent verifier with no direct connection to the producer who is creating the EPD.

4.1. Independence of verifier

The verifier will remain fully independent from both the party commissioning the EPD and their LCA practitioner. The verifier will be competent to verify the EPD. Verifiers are not employees of EPD Ireland. EPD Ireland will appoint a verifier from a pool of verifiers on a rotation basis or based on specialised competencies. The EPD Ireland programme will ensure independence by the following measures:

- Verifier should state any previous relationship with the manufacturer before appointment. Based on this information EPD Ireland may choose to confirm appointment or proceed to appoint alternative verifier.
- A verifier may choose not to accept appointment if they are not available or where they do not have the technical qualifications to assess the particular product. In this case the next verifier on the rotation list may be appointed.
- The manufacturer will pay the appointed verifier based on EPD Ireland scale of fees in advance of completion of verification.
- The scale of fees is agreed with all verifiers working for the EPD Ireland programme. This is to prevent negotiation of fees between manufacturer and verifier and avoid risk of financial pressure by the manufacturer on the verifier.
- All verifiers are required to report back to EPD Ireland secretariat where conflicts arise with the manufacturer or their LCA consultant.
- EPD Ireland will refer technical issues to the Technical Committee and will provide mediation in all other conflicts.
- Where a pre-verified tool is used for the creation of an EPD the verifier should be independent of the EPD tool provider.

4.2 Competencies of verifiers and PCR reviewers

IGBC shall only use verifiers and PCR reviewers who demonstrate competence to the Verifier Approval Committee (VAC). See section 2.3.3 Verifier Approval Committee of this document.

IGBC may invite candidates to submit on an annual rotation an application to VAC to be registered as a national verifier under the EPD Ireland programme. The intention is that there should be a panel of at least 5 verifiers.

Acceptance as an EPD verifier under the EPD Ireland programme will be based on the following criteria.:

- knowledge of relevant standards in the fields of LCA (ISO 14040-14044) and EPD (ISO 14025, I.S. EN 15804 +A1, EN15804 +A2 , CEN/TR16970, ISO 21930)
- knowledge of the relevant regulatory framework
- knowledge of relevant construction sector, product and product-related environmental aspects
- process and product knowledge of the product category
- knowledge of the program rules of the EPD Ireland programme.

- Practical experience in LCA (ISO 14040-14044)¹⁰¹¹, EPD (ISO14025, I.S. EN 15804, ISO 21930¹²) and of construction branch and products / industry.
- Academic qualifications in a relevant discipline.
- Documented experience of carrying out review of published EPD.
- Mutual recognition through other recognised ECOplatform EPD programme.
- Successful completion of a number of published EPD.

Additional experience.

- Experience of auditing.
- Processes for managing confidential data and the verification process.

EPD verifiers will be expected to maintain competence by

- Maintaining communication with the EPD Ireland programme and attending any online meetings regarding updates to the programme or the relevant international standards.

Where the programme accepts verifiers who do not have experience carrying out EPD verification their first two EPD verifications shall be reviewed by an experienced verifier.

IGBC shall maintain and update the list of verifiers on the EPD Ireland platform. Any expert who wishes to be included on this list will apply to the EPD Ireland Programme. An application form is provided in Annex D. This also includes the form to be completed by the Verifier Approval Committee for each candidate.

4.3 Consistency of EPD verification

All EPD verifiers are subject to peer review. This is to improve consistency in verification and use of report templates and checklists.

To ensure the consistency of EPD the first EPD verifications in the programme will be reviewed by technical committee, another verifier or experienced verifier mentor. The mentor verifier will also be appointed by IGBC. This ensures that verification expertise is built in the local market.

All verifiers on EPD Ireland must agree to attend one online meeting per annum to ensure changes in the programme are communicated and to raise any issues with the consistency of the verifications, or changes to standards

4.4 Communication of changes in PCR to verifiers.

IGBC will communicate new developments in EPD standards to verifiers and ensure that new developments are included in program rules and PCRs. All updated PCRs will be located on the EPD Ireland platform. Communication will be by email or communicated in online meetings.

4.5 Removal as EPD verifier from programme

VAC may remove verifiers from the programme for a number of reasons such as the following:

¹⁰ ISO 14040:2006 - Environmental management - Life cycle assessment - Principles and framework.

¹¹ ISO 14044 :2006 - Environmental management — Life cycle assessment — Requirements and guidelines

¹² ISO 21930:2007 – Sustainability in building Construction- Environmental declaration of building products

- Where the verifier is no longer active and has neither verified or published any new EPD in any programme in the previous 12 months.
- Where the verifier is not deemed sufficiently competent following audit or review of work.
- Where the verifier is guilty of gross professional misconduct.

VAC will notify the verifier in writing of the intention to remove them from the panel in advance of the removal, and provide a reason for the removal.

The appeal process for verifiers who are notified of an intention to be removed from the panel of verifiers, will be based on the overall policy for complaints and dispute resolution.

4.6 Complaints and dispute resolution procedure

In cases of dispute between the manufacturer, their LCA practitioner, and verifier during the verification process or thereafter they shall notify EPD Ireland. EPD Ireland shall attempt to resolve this informally, between the parties. If the party still wishes to make a formal complaint or seek formal resolution, they shall notify EPD Ireland of this intention. EPD Ireland will inform them of the process, and on receipt of formal written notification of the complaint will inform the complainant of the proposed action and seek to resolve the dispute within a reasonable period.

IGBC sets out its policy and procedures for managing complaints and appeals in its *Internal Staff Handbook Annex A – Quality assurance procedures for managing verification and certification programmes*.

5.0 Product Category rules (PCR)

Product category rules are the compilation of specific rules, requirements, and guidelines to be used to create an Environmental Product Declaration (EPD). The EPD Ireland programme divides PCR into two parts: A and B.

- Part A contains the life cycle assessment calculation rules for all product subgroups, which are developed and maintained by EPD Ireland programme Technical Committee. As the scope of this programme is construction products, I.S.EN 15804:2012+A1, I.S. EN 15804:2019+A2 and S.R. CEN/TR 16970:2016 with national parameters addendum form the overarching PCR. See Section 5.3.1 and annex A
- Part B regulates specific product subgroup requirements. These are only developed when there is a requirement by a manufacturer or trade group for more specific rules for a particular product type. EPD Ireland will moderate the development of these PCR if these are deemed to be necessary.

5.1 Interested parties and Involvement of Interested parties

Throughout the Product Category Rules (PCR) development stage EPD Ireland will strive to achieve consensus in the process.

IGBC shall ensure that the development of PCR is open for consultation for interested parties including industry, government agencies, trade organisations, manufacturers, LCA consultants, sustainability experts and academic organisations. The period of consultation shall not be less than two months. Relevant documents will be published on the IGBC / EPD Ireland website and interested parties will be notified.

Those who wish to be included on a list of interested parties should contact EPD Ireland directly so that they can be notified of consultations by email or other means.

5.2 Development of PCRs -PCR Expert review panel

The following procedures shall be used in developing PCR:

- Industry or other group seeking development of PCR will notify IGBC/EPD Ireland of intent to develop a PCR, and will provide clear reasons as to why existing PCR cannot be used.
- EPD Ireland will assess the need for the PCR in consultation with international programmes including Eco Platform.
- If agreed that new PCR is required, IGBC/EPD will appoint a moderator who will ensure adequate LCA technical expertise available within the PCR development committee
- Notify as many interested parties of the intent to develop the PCR
- Ensure a review of existing PCR already on the Eco platform register is carried out.
- Moderator will seek to achieve consensus on a draft PCR
- Moderator and secretariat will develop and check the draft for consultation and invite any external technical expertise where there is deemed to be lack of sufficient expertise in the committee on any particular issue.
- The draft PCR will be published on the EPD Ireland website for a minimum of two months and submissions will be invited from interested parties.
- PCR committee will review comments from consultation and agree to incorporate where appropriate and create a final draft PCR to undergo a formal PCR review process.
- EPD Ireland will establish an expert PCR review panel to review the final PCR draft. This will comprise of at minimum 2 experts and one chair also an expert. They must meet all the standard of competence set out in section 4.2 and may include representatives from international programmes.
- The PCR review panel will provide comments on the PCR documents, which will be reviewed by the PCR committee.
- The final PCR document with amendments, will include a page signed by the chair of the PCR expert group with any additional comments or recommendations.
- This final document will be published on the EPD Ireland website.

5.3 Product Category Rules in detail

5.3.1 PCR Part A – Core Rules

The core PCR part A requires EPD under the EPD Ireland programme to comply with I.S. EN 15804 and SR Cen tr 16970 – 2016 which sets out further guidance for the adaptation of I.S. EN 15804 at a National level. A short addendum to this document: "*Annex A: Product Category Rules: Part A, Implementation and use of I.S.EN15804and CEN TR 16970:2016 in Ireland*", provides additional requirements, particularly concerning the following aspects:

1. Environmental impact categories that are mandatory for use in the environmental impacts in the Environmental Product Declarations (EPD).
2. Resource use categories that are mandatory for inclusion in the EPDs.
3. Types of EPD that may be published in the EPD Ireland programme
4. Life cycle stage modules that are mandatory for inclusion in the different types of EPD.
5. Default values for use in calculations for particular modules

5.3.2 PCR Part B

If a PCR Part B for a product subgroup is needed, it should be first established whether there is already an existing EN 15804-compliant PCR for this sector through CEN Product TCs or through another international programme. A list of specific PCR developed by CEN Product Technical Committees can be downloaded at this link -

http://portailgroupe.afnor.fr/public_espacenormalisation/centc350/interpretations.html

The Hierarchy for deciding which PCR should be used should be in this order, moving to the next if not available in the first:

1. PCR developed by CEN Product Technical Committees compliant with the version of EN15804 with which the EPD will be compliant
2. PCR developed by CEN Product Technical Committees compliant with a different version of EN15804
3. PCR on Eco platform register of PCR compliant with EN15804 (when available)
4. PCR from other Programme Operators Eco platform members compliant with EN15804

IGBC shall consult with European Programme Operators who are members of Eco Platform before agreeing to development of new PCR. This is intended to reduce unnecessary duplication of PCR, which creates problems with harmonisation of EPD across Europe.

If it is necessary to create a Part B PCR, EPD Ireland will follow ISO 14027 for the creation of Product category rules, moderate its development and convene an Expert Review Panel, to review the PCR.

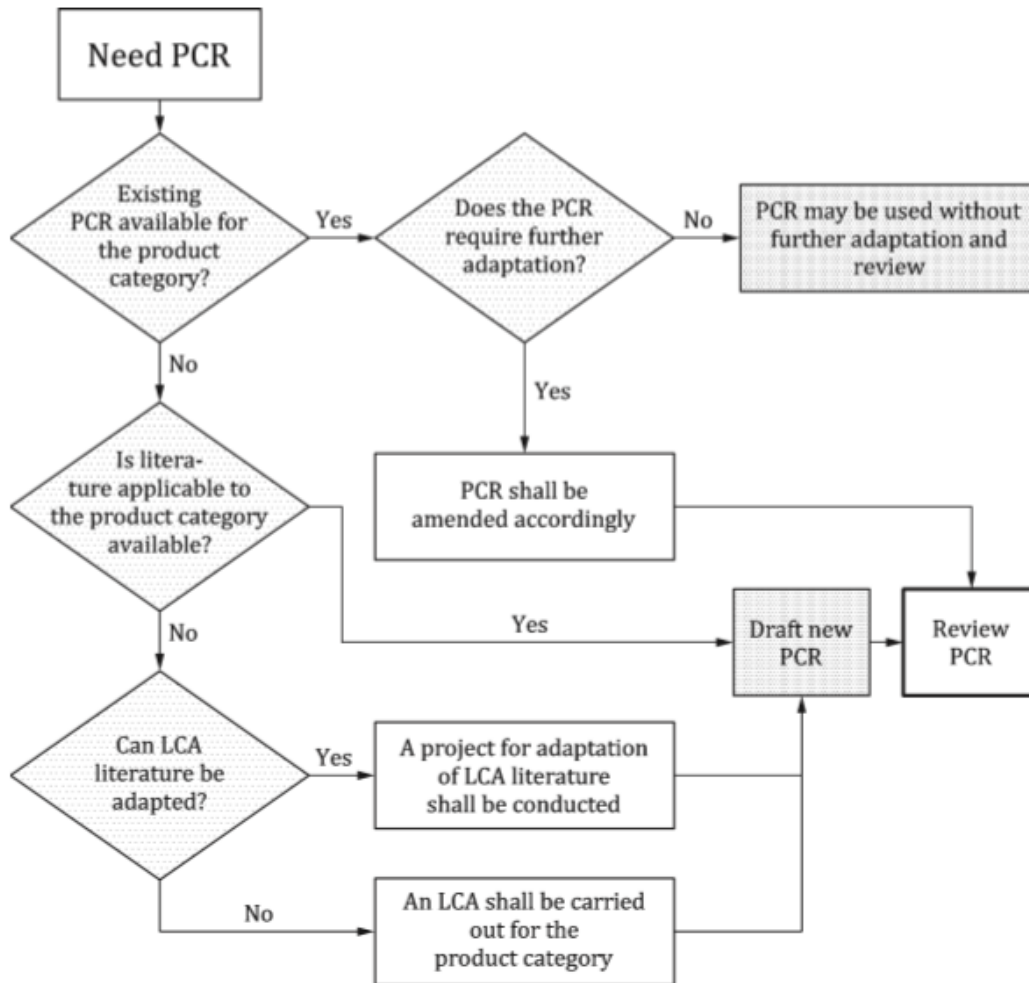


Figure 1. Guidance on the development of PCR – ISO 14027

5.3.3 PCR register

IGBC shall maintain an updated register of any PCRs that are created by the EPD Ireland programme or are adapted from other programmes on the EPD Ireland platform.

5.3.4 Validity period of Product Category Rules.

The Validity period of Product Category Rules is set out in I.S. EN 15804.

6.0 Publishing of EPD

6.1 EPD Ireland Platform

All verified EPD developed under the EPD Ireland programme will be published on the EPD Ireland platform located at the domain name www.epdireland.org as PDFs. This platform will comprise information pages on the programme and a freely searchable EPD database. The programme is transitioning to a cloud based platform for verification and publication. This will allow a digital ILCD +EPD format EPD to be simultaneously generated and published from the same template as the PDF. The digital EPD will automatically be published on the ECO Portal of the ECO Platform. This is to assist the integration of the data into tools such as Building Level LCA calculators or other analysis tools.

The EPD Ireland platform may continue to allow manufacturers and suppliers of construction products in Ireland to upload verified EPD from other programme operators in PDF format. These will be checked by IGBC to confirm that they are genuine 3rd party verified EPD created under a recognised programme. It will serve as the central reference resource for EPDs for construction products used in the Irish construction industry.

The platform allows the user to search for EPD using various filters under different product sub groups, programme operator, manufacturer, compliance with EN 15804 etc. A new filter will be added for EN15804 +A2 EPD.

EPD Ireland reserves the right in the future to restrict the platform to EPD from mutually recognised programmes.

6.2 EPD template

EPD Ireland will provide a branded template that must be used in the creation of the EPD under the Irish EPD programme. This follows the requirements of the relevant version of I.S. EN 15804 and is based on the Eco Platform best practice template. It sets out the order in which the information must be provided and this must be strictly adhered to. This includes requirements on how the LCA results are displayed, declaration of modules etc. The EPD template instructions provide guidance on the completion of the EPD. See Annex C.

The template is provided in Word and InDesign format. To ensure the quality of the final published EPD the final version must be published in a InDesign or similar format. The LCA consultant can provide the final version of the EPD in either format. If provided in Word template then EPD Ireland will convert to the Indesign format free of charge. However any changes required to this will be at the cost of making the changes. Therefore any issues to do with text, logos, branding etc must be agreed between the LCA consultant and the manufacturer.

Where there is mutual recognition between EPD Ireland and other programme providers, EPD can be republished using the EPD Ireland template. Where the EPD is already registered and published under another programme this fee will cover the cost of checking the reformatting.

6.3 Fees

The manufacturer should allow for the following fees when assessing the full costs of developing and publishing EPD under the programme.

- 1) **LCA consultant** – these are fees paid to the manufacturer’s own consultant – These are not set by EPD Ireland and need to be negotiated by manufacturer.

- 2) **Verifier Fees**- set fees for verification of the LCA report to be paid directly to the verifier appointed by EPD Ireland.
- 3) **Publication fees** – Set fees set by EPD Ireland – to be paid directly to EPD Ireland/IGBC to create EPD from the LCA report.
- 4) **ECO Platform fees** – These are annual fees paid by manufacturer to EPD Ireland/IGBC to be registered on ECO Platform and to carry ECO Platform logo. It is not mandatory to register the EPD as ECO Platform EPD. It is recommended particularly for those exporting products to European markets.

6.3.1 EPD Verification fees

The producer of the EPD will pay the designated fee to the verifier appointed by IGBC for verification based on the scale of fees set by the programme.

Where a pre-verified tool is used to create the EPD the reduced time for the verifier will be reflected in the verification fee. This will be agreed in advance based on the projected hourly rate for verification.

All fees exclude VAT

Single variation EPD

1 EPD	2 EPD	3 EPD	Additional EPD
€1700.00	€1,850.00	€2000.00	+ €100.00

Example - [Single variation EPD](#)

Multi variation EPD

Where manufacturer wishes to include variations eg. density, thickness within the same EPD rather than creating separate EPD for each one and is declaring a full set of LCA tables for each, there is a small charge for each table. This is to cover the time of the verifier to check each of the tables.

Single variation EPD	2 variations	3 variations	Each additional variation
€1700.00	€1,800.00	€1,900	+ €75.00

Example: [Multi variation EPD](#)

The fee scale applies to standard construction products and assumes that additional EPD are from the same product group and based on the same LCA report, requiring only minor changes to the EPD text and changing the data in the LCA tables.

Where EPD are for more complex products such as HVAC equipment are to be verified, these fees may be higher. In this case EPD Ireland will agree a fee scale with the manufacturer and the verifier.

The verification fees assume that the Life Cycle Assessment consultant presents all of the required information in the correct format. The LCA consultant must be fully familiar with both EN 15804 and CEN TR 16970: 2016, and the EPD Ireland PCR. They should also use the verifier checklist to ensure that they have met all the mandatory requirements of the verification prior to submitting the LCA report. This avoids iteration during the verification.

The information may be acceptable to be verified in two stages

- a) The LCA report.

b) EPD can be submitted to be checked based on verified EPD.

Where LCA consultant continually fails to meet the requirements set out in the standards and in the verifier checklist requiring excessive iteration of the verification then additional fees may be applied based on an hourly rate of €100.

These may only be applied in agreement with the EPD Ireland.

6.3.2 EPD Registration and publishing fees

A publication and registration fee will be charged for the processing and publishing of the verified EPD on the EPD Ireland Platform. This includes the cost of appointing the verifier and overseeing the verification process, processing the EPD into a the standard EPD Ireland graphic design format, hosting the EPD and the proper administration of the EPD Ireland programme.

This fee is paid directly to IGBC. The fees are per product group reflecting the fact that the EPD may be identical in all respects apart from density or thickness of product and assumes minor changes between EPD.

IGBC may choose to offer discounted rates for IGBC members based on their level of membership.

These are set as follows:

Number of EPD registered at same time	1 st time Registration fee once off	Annual charge. Not currently charged.
1	€1400.00	€0.00
2	€1700.00	€0.00
3	€2000.00	€0.00
4	€2300.00	€0.00
	Add €200 for each additional EPD	
Inclusion of additional product variations tables within same EPD*	€50 per variation	

This covers the additional graphic design time in including additional variations.

ECO Platform EPD fees



It is now required that all EPD issued by ECO Platform programme operators now carry the ECO Platform logo. The additional costs are now integrated into the fee structure and there is no longer an additional charge for using the logo

6.4 Mutual recognition of EPD from other programme providers.

IGBC will seek to gain mutual recognition with other programme providers of the EPD provided under EPD Ireland. This is intended to reduce the cost for manufacturers and suppliers of publishing EPD under different programmes.

7.0 Auditing of EPD Ireland programme

IGBC is a member of ECO Platform the organisation of European EPD programme providers. To ensure quality and harmonisation of EPD programmes, Eco platform carries out audits on its members' programmes before they can use the Eco Platform label. IGBC successfully passed the first audit by ECO Platform in 2018 and is recognised as an Established ECO EPD Programme and is entitled to use the logo "ECO EPD" in accordance with the settled rules.

8.0 Use of EPD data in building level assessment.

EPD are normally published as PDF documents. To make the data more useable all EPD will be published in digital ILCD +EPD format from early to mid 2021. This allows the integration of EPD into a database that can then be accessed by tools carrying out Building Level life cycle assessment to EN 15978.

IGBC intends to work with ECO Platform on harmonisation of digital EPD for use in Building Information Modelling (BIM) tools.

9.0 References

1. ISO 14025 Environmental labels and declarations - Type III environmental declarations - Principles and procedures (ISO 14025:2006, IDT)
2. Ecoplatform are the organisation of EPD programme operators in Europe seeking to harmonise the development of EPD. <http://www.eco-platform.org>
3. EN 15978 -Sustainability of construction works- Assessment of environmental performance of buildings- calculation method.
4. ISO 14027 Environmental labels and declarations — Development of product category rules
5. I.S. EN 15804:2012+A1 - Sustainability of construction works - Environmental product declarations - Core rules for the product category of construction products
6. I.S. EN15804:2019+A2 - Sustainability of construction works - Environmental product declarations - Core rules for the product category of construction products
7. Irish Standard Recommendation S.R. CEN/TR 16970:2016 - Sustainability of construction works Guidance for the implementation of EN 15804
8. ISO 14040:2006 -Environmental management- Life cycle assessment- Principles and framework.
9. ISO 14044 :2006 -Environmental management — Life cycle assessment — Requirements and guideline
10. ISO 21930:2007 – Sustainability in building Construction- Environmental declaration of building products.

Annex

Annex A – Core PCR Part A

Annex B – Verification Report and Checklist

Annex C- EPD Ireland template

Annex D– Verifier application form and assessment sheet