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Details

Date: **January 31, 2013**

Verifier/Reviewer: **Carl-Otto Nevén, chairman**

Purpose: **Validation and Approval of EAA EPD Program Rules and PCR documents**

Object of validation: **Program Rules of the EAA EPD Program version of January 30th 2013
(Based on version of November 14th 2005)**

and

**Product Category Rules (PCR) for Aluminium Building Products of January
30th 2013 (Based on version of March 14th 2007)**

Area: Building Products

**File: 13-01-30-EAA EPD Program rules - Final Version
13-01-30-EAA PCR on EN 15804 - Final Version**

Advisory Board: James Smith, Wintech; Birgit Grahl, Integrahl; Eva Schmincke PE-International;
Rutger Gyllenram, Kobilde & Partners

PCR: **N/A**

Commissioner: **European Aluminium Association (EAA)**

Practitioner: **European Aluminium Association (EAA)**

Verification statement: **N/A**

Validation statement

Purpose

The purpose of this validation was to examine if EAA's two updated requirement documents on their EAA EPD system and software fulfils the demands given in the standards ISO 14025 together with ISO 14040/14044, ISO 21930 and fulfils EN 15804 and amendment 1 and thereby making them appropriate to serve as requirement documents for the EAA EPD System and Software.

Background

The reason for updating the two documents was to make them compliant with current development and to make their content comply with the new standard EN15804 together with amendment 1.

Both new documents are based upon earlier reviewed versions of General Rules and PCR documents and no conceptual or intellectual changes has been made to the content of the older documents in the two new documents.

About the new documents

The new General Rules for the EAA EPD Program document is updated and modernized by EAA and was scrutinized by the Advisory Board. No significant changes of content, compared to the earlier version of that document, have been made.

The new EAA PCR document is updated and modernized by EAA and was scrutinized by the Advisory Board. It is based on a direct reference to the CEN standard EN 15804 with identical structure as that standard document except for the addition of two new annexes C (Informative) on 'the consideration of recycling aspects of aluminium building products' and D (Normative) on 'additional rules for a consolidated EPD covering a set of products' that have been amended to the structure of EN15804 after the bibliography. An extra clause 7.4.3 on 'other additional information' which does not exist in EN 15804 has also been amended to the PCR structure.

Where the EAA PCR in any way deviates from the standard text in EN 15804, that deviation is explicitly noted in the EAA PCR document as additional or more specific requirements. Those additional or more specific requirements are taken from the earlier reviewed version of the EAA PCR. Transcription of the earlier PCR text has been made to make it fit into the framework and intention of EN 15804 without any change of meaning of the standard. To read the full text the reader therefore shall have both documents at hand; a) the CEN standard EN15804 with amendment 1 and b) the new updated EAA PCR document. The new PCR uses the same requirements as given in EN 15804 with amendment 1 and no intellectual change has been made with respect to EN 15804. The new PCR document is therefore based upon an internationally recognised European CEN standard document finally acknowledged in a voting procedure during 2011.

The two new annexes is a response to the Advisory Board requesting more clarification on the calculation of Module D and more transparency to the life cycle calculation in combination with better examples than given in the earlier version of the PCR. More information in annex C has been provided regarding the quality of the recycled aluminium metal and how it fits into the recycling loop with explanatory figures. Annex D gives normative requirements for complex, consolidated (aggregated), products.

Procedure

The EAA EPD Advisory Board has examined the documents in accordance with ISO 14040, ISO 14044, ISO 14025 and ISO 21930 together with EN 15804 with amendment 1.

The EAA EPD Advisory Board held three two hour long Web/Phone-meetings on:

11.12.2012, 12.12.2012, 13.12.2012. It was decided to finalise the Advisory Board's work in January 2013 via email correspondence.

The Advisory Board comments were compiled and processed by the chairman and sent to EAA for response. The final response from EAA came back to the chairman 30.01.2013 and the Advisory Board was sent the final versions of the two documents later the same day 30.01.2013. On those final documents the Advisory Board members was urged to write their reservations. On the 30th of January it came in one late comment from Advisory Board member Rutger Gyllenram which in the end lead to a reservation on the final outcome of the PCR document. (See Reservations).

Regarding The PCR document: All questions and comments from the Advisory Board have been responded to by EAA in a due manner.

Regarding The General Rules document: All questions and comments from the Advisory Board have been responded to by EAA in a due manner.

The Advisory Board has set up a detailed list of comments, EAA responses and Advisory Board conclusions on both documents. This list is a separate document and is not included in this statement, but this validation statement is based upon that detailed list of comments.

Major issues discussed by the Advisory Board

The General Rules document

On the necessity of Involvement of interested parties in these updated versions of documents:

The Advisory Board/review Panel had a long discussion regarding the need of an involvement of interested parties due to changes in this new PCR in relation to the old PCR.

The Advisory Board/Review Panel concluded that a review panel of interested parties is not needed in this case since the new PCR is not intellectually different from the old PCR, and it is now a requirement that the new PCR shall reference EN 15804 as a background document. Thus the structure and value choices of the new EAA PCR is given by the standard and is not open for changes by interested parties. However if in the future new program rules or a new PCR should be developed to cover a new product group, interested parties shall be involved.

Please note that due to the reference to EN 15804 and ISO 14025, 14040/44, 21930, etc. changes will automatically occur when the referenced documents are reviewed or updated. Such changes have to be closely followed and discussed by EAA, also in relation to the issue of calling in interested parties. In such cases the Advisory Board/Review Panel shall be informed.

On the safety of manipulation of the EAA EPD system and software:

With background in that the EAA EPD software is a pre-verified software the question of manipulation safety of the system on a whole was assessed as crucial. EAA convinced the Advisory Board by in a discussion and by the writings in the General rules document that the software is sufficiently manipulation safe.

The EAA PCR document

Data quality requirements → EAA inserted one new additional reference; the EAA Environmental profile report.

Additional information → Run offs by rain from aluminium alloys was discussed. This was mainly about chromium run offs. → EAA presented two at the moment confidential reports on the subject reflecting the fact that this was not a major problem.

Calculation of net water consumption → The issue was thoroughly discussed but for the moment decided to be left out since there is a lack of methodology in the standard. → The comment from the Advisory Board was that EAA missed a chance to be one step ahead in the net water consumption discussion.

Handling of scrap calculations in Life Cycle Module C and Life Cycle Module D → This is described in new Annex C.

Better examples and clarification of the calculation of Module D → This is described in the new Annex C.

In the new informative Annex C the figure C5 was under discussion. → It was mainly the pedagogical dimension in the recycling rates that was discussed. During the review several extra figures were drawn to better facilitate the readers understanding. However none of these figures were in the end considered useful. This situation has lead to a reservation from the Advisory Board member Rutger Gyllenram indicating that if no one of the new possible figures were amended to Annex C also figure C5 should be deleted. The rest of the advisory board members finally after very long discussion concluded that Fig C5 shall stay in the document and no other figures will be used for explanation.

The reflection of a potential environmental benefit versus an overall environmental benefit was discussed → Module D is characterised in EN 15804 as recycling potential. This is a very important aspect and may lead to confusion in the discussion with interested parties. Therefore the meaning of module D should be very clear in the PCR. Recycling potential means, the benefit may occur, if the processes modelled in module D actually take place. In case of aluminium building products this is true in the future. In other cases incineration of plastic or cardboard may be modelled in D but it is not sure if the material will not end up in a landfill because the product is sold to a country with low-level waste management. Therefore it is a good idea in EN 15804 not to merge the numbers of A1-A3 with D but to declare them separately to reach transparency. For that reason it is not an overall benefit and not a credit. It is a calculation result of a scenario indicating a potential. In this sense module D should be communicated to avoid confusion and to facilitate the discussion with some

interested parties. → EAA did not fully agree on this but new text was provided and old text was deleted and/or changed in new informative Annex C chapter 6.

Conclusion

Based on its validation procedure the EAA EPD Advisory Board concludes that the two documents:

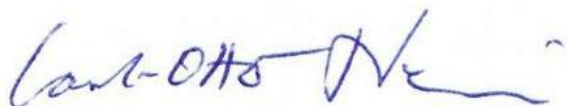
‘Program Rules of the EAA EPD Program’

and

‘Product Category Rules (PCR) for Aluminium Building Products’

appear to be appropriate and have been approved by the EAA EPD Advisory Board to fulfil their purpose for the EAA EPD System.

Sincerely,



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Reservations

From Rutger Gyllenram:

The EAA EPD Advisory Board member Rutger Gyllenram makes a reservation regarding Product Category Rules (PCR) for Aluminium Building Products, figure C5 in informative Annex C. Figure C5 should be deleted since the mass flow in the indicated loop is difficult to understand without further information on the conditions for the closed loop calculation from 90% totally available scrap metal mass to the actually recycled 40% scrap metal mass. At this end the possibly additional suggested clarifying figures unfortunately have been rejected by the Advisory Board.