

ECO PLATFORM

Tool Verification Guidelines

(formerly known as “Verification Guidelines for Automated Software Systems (Tools) for generating and verifying EPDs”)

Version 1.1 (June 2024)



Table 1: Version of this document

| Version Number | Date | Summary of changes |
|----------------|------------|---|
| V 01 | 20.12.2023 | Implementation of former TEWOG N15 document as part of ECO Platform Standards (formerly Technical Guidelines) |
| V1.1 | 20.06.2024 | <ul style="list-style-type: none"> • Editorial update incl. new version numbering and update of ECO Platform documents • Clarification: definition “EPD owner vs. holder” |
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1 INTRODUCTION

This document deals with verification requirements for EPD generated through a partially automated LCA underlying the EPD. The application of these calculation tools leads to a simplified verification process because certain elements of the LCA cannot be further influenced by those developing the EPD and verification of these elements is needed only once. However, the simplification of the EPD verification requires proper tool verification before the EPD can be verified.

1.1 Scope

Verification of automated software systems (tools) for generating and verifying EPDs shall ensure that the tool is in compliance with referenced ECO Platform standards (see “ECO Platform Standards – General Remarks” for a list of all standards).

There are two types of tools, (a) the LCA tool and (b) the EPD tool. The calculation provisions delivering Model-EPD or worst case EPD are not considered a tool. They also lead to a simplified verification of EPD. The verification rules for this kind of EPD are dealt with in the “Verification Guidelines for ECO EPD Programme Operators”.

It is recommended to engage the PO early in the development of tools leading to simplified verification.

1.2 Description of an LCA tool and where it is applied

The LCA tool uses a LCA model which is created based on EN 15804. The LCA model is parameterized for the bill of potential materials in a way which allows the user of the tool to modify a pre-defined selection of input data in order to produce a specific EPD. The LCA model cannot be changed by the user. The output of the LCA tool is a list of indicator results required for an EPD. The EPD itself is then created by the user of the tool. This kind of tool is used by associations or companies thereby creating specific EPD of different products all having the same or similar production processes.

A simplified LCA tool is used for EPD of products all having the same or very similar production processes and which differ in pre-described physical characteristics e.g. in density. The indicator results are declared for one product and the additional products can be calculated from these results by a simple equation considering e.g. the density which can be declared in the EPD as well or provided on the manufacturer’s website.

The following table shows examples of who can be the owner and/or the user of an LCA tool:

| Owner of the tool | User of the tool, |
|---|--|
| Associations | Association members, (manufacturers) |
| Software providers | Manufacturers |
| Manufacturers making similar products with differing bills of materials or differing physical characteristics e.g. density, volume etc. | Retailers selling products for building projects. |
| | Manufacturers using their own tool |
| EPD-creator/LCA-practitioner | EPD-Creator/ LCA-practitioners working for manufacturers |

Table 1: examples of owners and users of the LCA tool

1.3 Description of an EPD tool and where it is applied

The EPD tool uses an LCA model based on EN 15804. The LCA model is parameterised for the bill of a product’s potential components in a way which allows the user of the tool to select the components connected to a specific product from a pre-defined menu in order to produce a specific EPD. The LCA model nor the menu can be changed by the user. The selection in the menu of options and calculation of the indicator results leads directly to the specific EPD i.e. the output of the EPD tool is an automatically produced complete EPD.

This kind of tool is used by manufacturers with a large portfolio of different products based on a limited number of components.

The following table shows examples of who can be the owner and/or the user of an EPD tool:

| Owner of the tool | User of the tool |
|--|--|
| Associations | Members, (manufacturers) |
| Companies providing product-components for products made from components | Manufacturers using the product-components for the products they are responsible for |
| Companies providing building-components for building projects | Manufacturers installing building-components they are responsible for in building projects |
| Manufacturers making building-components they are responsible for | Manufacturers |
| EPD-creator/LCA-practitioner | EPD-Creator/ LCA-practitioners working for manufacturers |

Table 2: examples of owners and users of the EPD tool

1.4 Summary of tool types

The following table shows the different tool types and the scope of the verification depending on the outcome of the tool and the way data integrity is managed.

| | LCA Tool | | EPD Tool | |
|--|--|--|---|---|
| | with individual verification | fully integrated | with individual verification | fully integrated |
| Output | Results of LCA for product in question | | Full EPD document, not only LCA results | |
| Input | Quality of input data is not intrinsically ensured | Quality of input data is intrinsically ensured | Quality of input data is not intrinsically ensured | Quality of input data is intrinsically ensured |
| Scope of verification - individual EPD | 1. input data, consistency of input and output data (each individual EPD) 2. Format and content of EPD document | 1. sample check of input data, consistency of input and output data 2. Format and content of EPD document | 1. input data, consistency of input and output data (each individual EPD) | 1. sample check of input data, consistency of input and output data |

Table 3: Types of tools. The fully integrated LCA tool is greyed out because of its limited practical relevance.

If a Programme Operator wishes to verify a tool that does not fall into the definition of tool types above, the PO may submit a proposal to the ECO Platform’s TEWOG to update the list of tools accordingly.

1.5 General Principles of tool verification

The qualified tools are verified based on the tool project report (see chapter 1.5.1), the EPD project report (see chapter 1.5.2) and the EPD verification report (see chapter 1.5.4) from the first EPD calculated by the tool. The tool project report is provided by the developer of the tool. The EPD project report is usually generated by the tool. The EPD verification report is provided by the verifier of the tool. The following figure describes the sequence of actions and documents for tool verification:

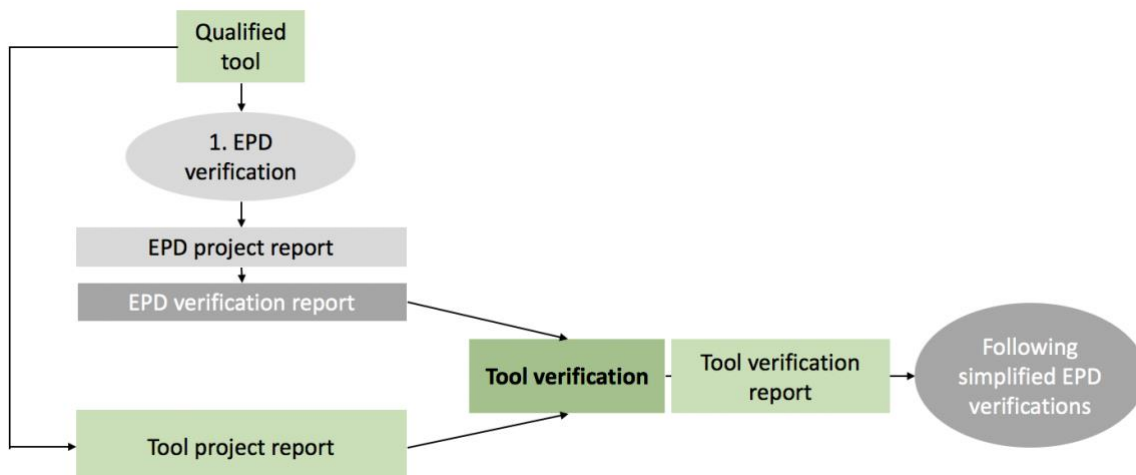


Fig 1: Description of the sequence of actions and documents for the tool verification

No tools shall be applied without tool verification. Declarations from tools without tool verification are not considered as EPD. Tools shall not be changed after verification. Changes in tools relating to the LCA results shall provoke a new tool verification. The owner of the tool shall keep track of any changes, describe them, and make them available to the PO and the verifier. Each tool is valid for a defined PCR or group of PCRs.

Note: the verification of an individual EPD according to ECO Platform's Verification Guidelines is always possible, independent of the means of developing the EPD.

1.5.1 Tool Project Report

The owner of the LCA tool is responsible for the proper verification of the tool organised by a PO, member of the ECO Platform.

For verification the tool shall be provided to the verifier together with the **Tool Project Report** which shall document the following:

- ownership of the tool (legal entity)
- identification of the tool including the version number
- applicable PCR or range of PCR including the PCR version
- description of the LCA model of the tool,
- assumptions on which the model is based,
- sensitivity assessment of the variable parameters
- description of the data quality
- conditions under which the tool is to be used and
- information for the project report of the EPD if needed.

The tool project report is confidential and only provided to the verifier.

1.5.2 EPD Project Report

The **EPD Project Report** is generally automatically produced by the tool for each EPD calculated by the tool. It includes all information necessary for the verification of the first and following simplified EPD, that is the reference to the tool version and, in case the verifier needs it, to the tool project report. Further a description and explanation of the variable input data and the main drivers for the indicator results should be provided as well as the description of the data quality of the variable input data.

The EPD project report is confidential and only provided to the verifier.

1.5.3 Tool Verification Report

The tool verification shall be documented in a **Tool Verification Report** which is made available to the Programme operator (PO). The tool verification report shall include the verification of the LCA according to the core checklist for verification in the "Verification Guidelines for ECO EPD Programme Operators" (chapter 2). Additional requirements for tool verification are described in the following clauses of this document.

1.5.4 EPD Verification Report

The **EPD Verification Report** shall report all verification actions of the simplified EPD verification and reference the tool verification report. The reference shall allow identification of the tool (e.g. in case of a revision of the verification) and provide the version of the tool and the PCR it relates to. The tool shall also be identified in the EPD including the tool version number.

It is useful to add comments in the EPD verification report how the tool could be improved.

1.6 Changes to the Tool

1.6.1 Changes to the LCA model or background data

The most straightforward way to assure that the tool is not manipulated after verification is to lock it.

Any change to the tool, (e.g. to the LCA model) after tool verification by the owner of a locked tool shall result in a new version of the LCA tool. Only verified versions of the tool can be applied.

However other procedures of prohibiting such manipulation can be applied. In the case of unlocked LCA tool the version number is only changed when the tool is changed, not with each integrity check.

1.6.2 Changes due to updates

It is the tool owner's responsibility to update the tool if conditions have changed within the time of the tool validity. It is the PO's responsibility to inform the owner of the tool about relevant changes of the PO's program rules, e.g. changes in the PCR. Updated versions need to be verified.

1.7 Validity of the Tools

All tools shall be valid for at maximum 5 years. After 5 years a tool shall be verified again. The effort of this verification will depend on the severity of changes (e.g. LCA model, underlying background data, change in components of the product). The validity period starts after the verification of the tool.

The tools shall be archived for the validity period of the last EPD created with the tool. The owner of the tool shall be responsible for archiving the tool versions. Only verified versions of the tool can be applied.

2 LCA TOOL VERIFICATION

2.1 Definition and Characteristics

The tool only allows the user to change a number of pre-determined input parameters.

The simplified LCA tool is used for EPD of products having the same or very similar production processes and differing in pre-described physical characteristics e.g. in density or mass of the material driving the results. The tool is valid for a defined PCR.

2.2 Changes to the LCA Tool

Next to locking the tool, other procedures of prohibiting its manipulation can be applied. In the case of an unlocked LCA tool, each application shall be preceded by a check of the tool's integrity. This may be done e.g. in a (web-)meeting between the verifier and the user, where the verifier runs the tool with specified values (e.g. with input parameters set to 1) which will result in known indicator results. In the case of unlocked LCA tool, the version number is only changed when the tool is changed, not with each integrity check. Any generated contents of an EPD from the simplified LCA tool which are not individually verified shall not be considered as part of the verified EPD.

2.3 LCA Tool Qualification

It is recommended check the tool, before the more time-consuming actual process of verification of the tool is started. The tool owner, supported by the developer of the tool, should provide a description or presentation of the tool to the PO organising the verification and if possible to the tool verifier. The tool owner could provide several confidential, independent reference data sets (not simple scale-ups) to the user from which the verifier may select data sets to test the tool.

The tool owner shall demonstrate how manipulation of the tool is avoided after verification. Locking the tool is the most straightforward way, but not the only way of avoiding manipulation.

After this first check-up the tool is qualified for verification.

2.4 LCA Tool Verification

The tool verifier shall receive the tool and guidance on its application in order to test the tool.

For the LCA part, e.g. the LCA model and its assumptions, allocation rules and system boundaries, as well as for the EPD, e.g. the obligatory content, SVHC declaration, the core checklist of the "Verification Guidelines for ECO EPD Programme Operators" shall apply. All verification actions are documented in the tool verification report.

2.4.1 First EPD of an LCA tool

“First EPD verification” shall be part of the LCA tool verification. For the LCA tool verification an EPD of a real product or of a fictive product calculated by the tool shall be provided as a test.

The verification of this first EPD shall be done according to the ECO Platform core verification checklist. The tool project report should support the writing of the EPD project report for this first EPD. The project report of the EPD shall contain all information needed to satisfy the core verification checklist. The intention is that all following EPD project reports shall use this first project report as a template.

2.4.2 Verification process of the second and following EPD

Each EPD is verified individually according to the verification checklist. However, all items dealing with the modelling of the processes and the fixed content of the EPD can be accepted based on the verification of the LCA tool and the first EPD verification. This means as a rule only the variable input data and the respective results of the EPD need to be checked for plausibility.

The verification may be restricted to the following aspects:

- plausibility of input and output data,
- additional information,
- formal aspects if applicable.

The EPD verification report shall report the following at minimum:

- the results of applying in a simplified way the core checklist for verification in the “Verification Guidelines for ECO EPD Programme Operators”(chapter 2),
- the variable input data used in the EPD and identification of the inputs driving the indicator results in relation to the project report of the tool verification,
- verification action for any additional information e.g. non LCA indicator results
- reference to the tool version and the tool verification report.

If the inputs are always the same, average EPD calculated with an LCA tool may only need a verification once.

3 EPD TOOL VERIFICATION WITH INDIVIDUAL VERIFICATION OF EACH EPD

3.1 Definition and Characteristics

The EPD tool allows the user to change pre-determined input data that can be modified to fit a specific product. Such modification is limited to the options in a pre-defined menu connected to that specific product, e.g. the selection of specific components of the product. After verification the tool shall not be modified with respect to the menu nor its underlying data. The most straightforward way to assure that the tool is not manipulated after verification is to lock it. However other procedures of prohibiting such manipulation can be applied. The tool is valid for a defined PCR.

3.2 Changes to the EPD Tool

Next to locking the tool other procedures of prohibiting its manipulation can be applied. In the case of an unlocked EPD tool, each application shall be preceded by a check of the tool's integrity. This may be done e.g. in a (web-)meeting between the verifier and the user, where the verifier runs the tool with a set of specified components (e.g. with all available components in the menu) which will result in known indicator results. In the case of unlocked LCA tool the version number is only changed when the tool is changed, not with each integrity check.

3.3 EPD Tool Qualification and Approval of the Tool

It is recommended check the tool, before the more time-consuming actual process of verification of the tool is started. The tool owner, usually represented by the developer of the tool, should provide a description or presentation of the tool to the PO organising the verification and, if possible, to the tool verifier. The tool owner could provide several confidential, independent reference data sets (not simple scale-ups) to the user from which the verifier may select data sets to test the tool.

The tool owner shall demonstrate how manipulation of the tool is avoided after verification. Locking the tool is the most straightforward way, but not the only way of avoiding manipulation.

After this first check-up the tool is approved for verification.

3.4 EPD Tool Verification

For the tool verification all rules and the checklist for EPD verification shall apply.

The data and LCA model which cannot be changed shall be identified in the tool verification report.

Any variations in the menus governing the input data shall be limited to what is pre-defined in the tool.

EPD tool verification shall include the verification of a real product or a fictive product as a first EPD verification, see chapter 2.4.

3.5 First EPD of an EPD Tool

“First EPD verification” shall be part of the EPD tool verification. For the LCA tool verification an EPD of a real product or of a fictive product calculated by the tool shall be provided as a test.

The verification of this first EPD shall be done according to the ECO Platform core verification checklist. The tool project report should support the writing of the EPD project report for this first EPD. The project report of the EPD shall contain all information needed to satisfy the core verification checklist. The intention is that all following EPD project reports shall use this first project report as a template.

3.6 Verification process of the second and following EPD

Each EPD is verified individually according to the core verification checklist of the Verification Guidelines for ECO EPD Programme Operators. However, all items dealing with the modelling of the processes and the fixed content of the EPD can be accepted based on the verification of the LCA tool and the first EPD verification. This means as a rule only the input data governed by the menu and the respective results of the EPD need to be checked for plausibility.

The verification may be restricted to the following aspects:

- plausibility of input and output data,
- additional information,
- formal aspects if applicable.

The EPD verification report shall report the following at minimum:

- the results of applying in a simplified way the core checklist for verification in the “Verification Guidelines for ECO EPD Programme Operators” (chapter 2),
- the variable input data used in the EPD and identification of the inputs driving the indicator results in relation to the project report of the tool verification,
- verification action for any additional information e.g. non LCA indicator results
- reference to the tool version and the tool verification report.

If the inputs are always the same, average EPD calculated with an EPD tool may only need a verification once.

4 INTEGRATED EPD/LCA TOOL

4.1 Definition and Characteristics

This chapter refers to EPD and LCA tools that are integrated in electronic or administrative management systems to a degree that integrity of input data is ensured to a level comparable to that of traditional third-party verification. The software tools are similar to the tools described in chapter 2 and 3, but contain intrinsic or external safeguards to ensure said data integrity. The output of the tool can be either an LCA or (which is more often the case) a complete EPD (see Table 3).

The verification of these tools follows the same principles as those discussed in the other chapters. The key difference is that the mechanisms to ensure data integrity shifts verification requirements further from individual EPDs or LCA studies to the tool and the management process it is embedded in.

The management process can take a wide range of different shapes from traditional systems based on human checks and interactions to widely automated systems with e.g. automatic data transfer from control systems in the production process.

4.2 Changes to the Tool

After verification, changes to the tool shall be limited to varying the user-defined input parameters. The most straightforward way to assure that the tool is not manipulated after verification is to lock it. However other procedures of prohibiting such manipulation can be applied.

The tool is valid for defined PCRs. To extend the scope of the tool to other PCRs, it must first be verified against these PCRs.

Any change to the tool beyond the variation of user-defined input parameters shall be communicated to the Programme Operator. All changes that will likely affect numeric results of the LCA or may potentially jeopardize fulfilment of formal requirements to the final document require a re-verification of the tool; the programme operator may limit the re-verification process to the parts of the tool that were modified. Only verified versions of the tool can be applied. Older versions of the tool shall be kept for the validity date of the last EPD generated using the tool.

4.3 Verification of Integrated Tools

For the tool verification all rules and the checklist for EPD verification shall apply.

The data and LCA model which cannot be changed shall be identified in the tool verification report.

Any variations in the menus governing the input data shall be limited to what is pre-defined in the tool.

EPD tool verification shall include the verification of a real product or a fictive product as a first EPD verification, see chapter 2.4.1.

For the verification of the LCA model including background data as well as for the verification of the final documents generated by the tool (if applicable) the same rules as for non-integrated tools apply.

In order to respond to the special characteristics of integrated tools the following requirements need to be met:

- Log function for the tool: The tool shall have a log function that records all changes made to the EPD tool, including but not restricted to new data, modification of formulae and algorithms, modification of background data, expansion to additional PCRs, changes to format and content of output. The log function also needs to record the date of any modification made; a clear and easy-to-understand numbering of versions of the tool is recommended.
- Log function for EPDs: The tool has to provide a log function that records for all EPDs generated at least the following information:
 - Name and number of the EPD,
 - Date of generation,
 - Name of user who generated the EPD,
 - All user-defined input parameters.

An alternative solution for the name of the user and the user defined input parameters is to store them in separate reports that need to be kept in accordance with the rules for background reports.

- The verifier has to check the credibility of results. As there is a wide range of solutions the following points may not cover all options and may have to be adjusted and expanded over time:
 - Overall management procedure: Is the overall management procedure adequate for the complexity and degree of freedom of the tool in question? This should particularly include
 - Definition of roles and processes
 - Training and guidance for users and reviewers, where applicable
 - Maintenance and update of the tool
 - Data integrity: Depending on the type of tool this will typically include:
 - Assessment of the quality control process for manual data input; this should typically include an internal review (four eyes principle) of data before generating EPD.
Note: If all variable input data are reported in the EPD (e.g. in configurator-type tools for windows, wall systems etc.) no additional quality control measures on input data are required.
 - Automatic data input (e.g. via interface from process control or accounting systems): Assessment of evidence that the source of data as well as the transfer process are reasonably safe against manipulation, be it intentional or accidental. In this context the following sources of data can be considered to fulfil this requirement unless case-specific circumstances indicate otherwise:

- Systems to control production processes;
- Accounting systems;
- Other data management systems that feed directly into accounting processes.

In all other cases additional evidence needs to be provided.

4.4 Pilot EPD(s) of the Tool

“Pilot EPD verification” shall be part of the EPD tool verification. For the tool verification at least one EPD of a real product or of a fictive product calculated by the tool shall be provided as a test.

The verification of this pilot EPD shall be done according to the ECO Platform core verification checklist. The tool project report should support the writing of the EPD project report for this pilot EPD. The project report of the EPD shall contain all information needed to satisfy the core verification checklist.

The "pilot EPD(s)" may be a test EPD, the actual first generated EPD, or a larger sample of generated EPDs” .

4.5 EPDs generated during operation and annual check-ups of the Tool

For the second and the following EPDs an individual verification is not needed.

- At least once a year a check-up of the tool shall be performed; exceptions can be made if it can be proven that since the previous check-up the number of generated EPDs from the tool is below a threshold defined by the programme operator (e.g. if the accumulated number of EPD is ≤ 3)

This check-up shall include at the minimum:

- A thorough review of the log files for both the tool and the EPDs generated.
- The definition of a reasonable sample of EPDs generated since the last verification.
- The verification of these EPDs. The scope of those verifications may be restricted to the following aspects:
 - plausibility of input and output data,
 - additional information,
 - formal aspects if applicable

The EPD verification report should include the following at minimum:

- , the number of EPDs developed and generated with the tool since the last check-up”,
- the description of the sample and how it was determined,
- the results of applying in a simplified way the core checklist for verification in the “Verification Guidelines for ECO EPD Programme Operators” (chapter 2),
- the variable input data used in the EPD and identification of the inputs driving the indicator results in relation to the project report of the tool verification,
- verification action for any additional information e.g. non LCA indicator results
- reference to the tool version and the tool verification report.

Note: Individual EPDs can be published before the check-up for the corresponding period has been performed. Programme operators should define a process for dealing with identified non-conformities that may affect already published EPDs.

4.6 Validity of the Tool

Without changes to the EPD tool, a renewed approval shall be done after a given number of years according to the PO's rules not exceeding 5 years. It is the tool-owner's responsibility to update the tool if conditions have changed, e.g. if the data quality requirements are no longer fulfilled due to aging. It is the PO's responsibility to inform the owner of the tool about relevant changes, e.g. changes in the PCR.

5 ANNEXES

5.1 Table of a list of roles for EPD/LCA tools, integrated in management systems

Table of a list of roles for EPD/LCA tools, integrated in management systems and types of organisation/personnel who may perform each role.

| Role | Type of organisation(s), personnel |
|--|--|
| Manufacturer | (As for normal EPDs) |
| EPD developer | (As for normal EPDs) |
| EPD/LCA tool owner | (As for normal EPDs) |
| EPD/LCA tool administrator (<i>ensuring that the tool is locked and cannot be changed by the tool users</i>) | Can be the tool owner or someone mandated by the tool owner |
| EPD/LCA tool user | Personnel fulfilling the competence requirements as approved by external independent verifier |
| Internal independent verifier of EPD | Personnel fulfilling the competence requirements as approved by external independent verifier |
| External independent verifier of EPD/LCA tool integrated in management system (third-party) | <p>As set in the General Programme Instructions, for example any of the following (or a combination of):</p> <ul style="list-style-type: none"> • Programme Operator • Verifier approved by Programme Operator • Accredited certification body <p>The party shall fulfil the following minimum requirements:</p> <ul style="list-style-type: none"> • Independent • Competence in LCA and EPD • Competence in process verification |

5.2 Glossary

| | |
|-------------------------------|---|
| Data integrity | In the context of tools, data integrity is a broad concept to describe that input data (and correspondingly outputs) of particularly fully integrated tools have a level of reliability and trustworthiness that is comparable to that in EPDs that undergo the full verification process for individual verifications. Data integrity goes beyond data quality in that it also encompasses the way primary data are selected and entered into the tool (e.g. measures to avoid accidental or deliberate data manipulation). |
| Developed EPD | EPD that are ready to be generated by the tool, but not yet a physical document |
| Generated document or EPD | Physical document (also an EPD) that the user of the tool can use for its aims. The generated EPD are usually published by the PO. |
| PCR – Product Category Rules | Set of specific rules, requirements and guidelines for developing Type III environmental declarations (3.2) for one or more product categories (3.12) |
| Pilot EPD | An EPD of a real or fictive product that is developed in order to demonstrate the functioning of the tool in the tool verification process. Please note that the terminology may differ from PO to PO. |
| Programme Operator (PO) | The manager of the EPD program, as defined by ISO 14025 |
| Tool | Verified and qualified calculation algorithm, which implements an LCA model to develop and generate an EPD |
| User-defined input parameters | Data and text that the user of the tool enters. The corresponding fields are not locked (or otherwise protected). In fact, they define the theoretical scope of the tool. In terms of LCA-related data, the user-defined input parameters typically include primary data (e.g., bill of materials or list of components, consumption of energy and auxiliary materials, transportation distances), but depending on the tool and the measures taken to ensure <i>data integrity</i> the list may be longer or shorter. As for non-LCA-related data, they may include product names and descriptions, technical data, and other information. |
| Verification | (In the context of tools) The process of confirming by a third party that a given tool complies with the requirements of a PO as laid down in Programme Instructions, PCRs and (where applicable) other relevant documentation. Please note that the terminology may differ from PO to PO. |