General Program Instructions for Environmental Product Declarations (EPDs)

Prepared by FPInnovations
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(This version replaces January, 2011 Version)

<table>
<thead>
<tr>
<th>Version No</th>
<th>Amendments</th>
<th>Date Issued</th>
</tr>
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<tbody>
<tr>
<td>January 2011</td>
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<td>January 17, 2011</td>
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<tr>
<td>March 2013</td>
<td>Expanded the program scope to include additional wood products and materials, pulp and paper products, biofuels, and non-wood building products.</td>
<td>April 12, 2013</td>
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Program Scope
The scope of the program is to develop and publish Type III environmental product declarations ("EPDs") for major product groups stated below.

- Wood construction products and materials
  Construction products and materials made of wood and other forest-based components including, but not limited to, siding, decking, flooring, shingles, doors and windows, millwork, such as door and window frames and base boards, lumber and other board-type products and panel-type products.

- Other wood products
  Wooden furniture such as seating, storage, kitchen cabinets, and pallets.

- Complementary non-wood products and materials
  In collaboration with other material sectors as appropriate and as desired by those sectors, products that are complementary to wood materials. Examples include fasteners (e.g., nails), materials that afford fire protection (e.g., gypsum boards and gypsum panel products), and products that are a wood/non-wood hybrid or bio-composite.

- Pulp and paper products
  Pulp, tissue, paper and paper products, including packaging; printed matter and related articles; pulp fibre-reinforced composites; lignin, etc.

- Cellulosic biomaterials
  Cellulose derived biomaterials such as nanocrystalline cellulose (NCC), cellulose filaments, cellulose gels.

- Bioproducts
  Furfural, PHA (polyhydroxyalkanoates), PHB (polyhydroxybutyrate), PLA (polylactic acid or polylactide), thermoplastic starch and green adhesives.

- Biofuels
  All types of biofuels, including all hog fuels, pellets, cellulosic methanol, ethanol and butanol, biodiesel, syngas (synthetic natural gas), and biogas.

Compliance with relevant standards
EPDs developed under this program will comply with and take into consideration recommendations in international standards for Type III environmental product declarations, namely, ISO 14025 (Environmental labels and declarations – Type III environmental declarations – principles and procedures) and where applicable ISO 21930 (Sustainability in building construction — Environmental declaration of building products). LCA data for the EPDs will be calculated and documented in accordance with the ISO 14040 and ISO 14044 for environmental management and life cycle assessment (LCA).
Program Operator
FPInnovations is the program operator responsible for the preparation, maintenance, and communication of general program instructions governing the development of Product Category Rules (PCRs) and EPDs for the list of products mentioned under the program scope. FPInnovations helps the Canadian forest industry develop innovative solutions based on the unique attributes of Canada’s forest resources, with a focus on sustainable development and taking full advantage of the industry’s substantial scientific, technological and commercial capital. See http://www.fpinnovations.ca for more information.

FPInnovations is responsible for administration of the EPD program, which includes;
- Development of product category rules (PCRs) for the products stated in the program scope;
- Commissioning LCA studies;
- Developing EPD documentation; and,
- Establishing minimum requirements for competence of EPD verifiers and the PCR Review Panel
- Appointing a third party verifier to verify EPDs.

Program Objectives
The objective of this program is to establish and implement the necessary process(es) for developing credible, comparable and consistent EPDs, for both Business to Business (B-to-B) applications and Business to Consumer (B-to-C) communications. The EPDs will be intended to assist purchasers and users to make informed comparisons between products, however they will not represent environmental claims regarding the superiority or equivalence of one product versus a competing product that performs the same function.

In order to ensure these objectives are achieved, the process will include;
- Selection of an existing suitable PCR where one exists, and adaptation as required to create specific PCRs for the products under consideration;
- Establishment of a transparent procedure for the development and review of new PCRs, including details of the review processes and how the PCR review panels are constituted;
- Commissioning or undertaking LCAs to develop and prepare EPD documents;
- Ensuring the selection of competent independent verifiers and PCR review panel members;
- Publishing Type III environmental declarations within the program;
- Maintaining publicly available lists and records of PCR documents and Type III environmental declarations within the program; and
- Implementing changes in procedures related to the program, and revising and reissuing the program and documents when necessary.

Intended Audience
The intended audience for the EPDs is business-to-business (B-to-B) or business-to-consumer (B-to-C) depending on the specific product group and appropriate to the intended application.
Procedure for Definition of Product Categories

Each of the major product groups listed under the Program Scope contain variety of products that can be grouped into more specific product categories and subcategories. More specific subcategories for the main product categories may be defined considering similar functions or similar technical specifications. Assigning a group of products under those major product categories to a more specific subcategory shall be on the basis that the same functional or where applicable declared unit can be applied. Assignment of building products into different product categories will be done based on their similarities in building applications and uses and the functions they perform in buildings.

Products will be classified in accordance with the UN Central Product Classification System (CPC)\(^1\) and cross-classified with other systems, such as the Harmonized System Commodity Description and Coding (HS), the Construction Specification Institute (CSI) system, and Global Product Classification (GPC), as appropriate or required.

Involvement of Interested Parties

Interested parties will be identified for review and consultation on PCRs from the stakeholder groups listed in ISO14025 for B-to-B or B-to-C applications, as applicable. Those with adequate knowledge of the products and their life cycle environmental stresses will be selected, and FPInnovations will publish the names of the organizations or individuals.

PCR Review

FPInnovations will set up a PCR Review panel that consists of a Chair and two or more invited members for the PCR consultation process. For each PCR developed, a unique panel with relevant experience and technical knowledge will be assembled. The Chair will provide adequate time for the review and make reasonable efforts to reach consensus throughout. The Chair will also make sure that the PCR Review Panel members receive responses to their comments within a reasonable time.

FPInnovations will ensure that there is a reasonable mix of perspectives and competencies on the review panel while ensuring that it neither consists solely of members from the product manufacturing sectors nor persons dependent on the product sectors. The combined competencies of the review panel shall include the following:

- General background knowledge of the product sector under consideration and related environmental aspects; and
- Expertise in LCA methodology and knowledge of EPD principles and procedures defined in ISO 14025 and ISO 21930.

The reviewers will verify that the PCRs are developed in accordance with the requirements and guidelines stated in ISO 14025 and if relevant ISO 21930 as well, and support credible, and consistent EPDs. In addition, the review process shall confirm that PCRs will meet the following criteria:

• PCRs shall be consistent with the rules defined under the ISO 14040 and ISO 14044 for goal and scoping of LCA studies;
• Functional units and allocation and calculation rules are adequate for the product categories; and
• The selection of life cycle impact assessment (LCIA) indicators and additional information to be reported is done in accordance with the requirements and guidelines stated in ISO 14025 or ISO 21930 as appropriate.
• The LCA-based data, together with the additional environmental information prescribed by the PCR, give a description of the significant environmental aspects of the product.

**Data Confidentiality Management**

Any data or information supplied by or on behalf of parties seeking an EPD will not be used for any purpose other than in connection with the generation of EPDs in accordance with FPInnovations’ EPD Program.

1. All data will be kept strictly confidential, except for data and information that is required to be published in the EPD in accordance with the applicable PCR.
2. FPInnovations will prevent access by unauthorized persons to confidential information and its employees, subcontractors and stakeholder experts will have entered into confidentiality agreements prior to having access to any such confidential information.
3. All electronic and hardcopy data will be archived for any future communication with the client in a secure format and location when the EPD has been formally issued.
4. FPInnovations will return, upon request, all hardcopy or electronic documents, records, notebooks, computer media or other stored information containing confidential information in its possession or control.

**Procedure for development and maintenance of PCR**

FPInnovations will prepare draft PCRs for relevant products and then finalize them based on the comments and recommendations received during the consultation with the PCR Review Panel.

The PCRs will contain:
• The intended application;
• Product category definition and description;
• Goal and scope of the LCA-based information for the product category;
• Reference service life in accordance with ISO 15686-1 Buildings and constructed assets- Service life planning, when relevant;
• Rules on producing the additional environmental information;
• Details on the life-cycle stages (information modules) to be included;
• Procedure for inventory analysis;
• The parameters to be covered;
• The way in which the parameters are collated and reported; and,
• Period of validity.

Period of validity will be determined based on the information on technological development trends in resource extraction and manufacturing sectors (collected from the manufacturers or
relevant associations) as well as changes that may affect the use and end of life phases, and comments received during consultations.

**Development/Availability of LCA-based Information for EPDs**
FPInnovations will ensure that LCAs are performed in accordance with the finalized PCRs for the product categories under consideration through critical review.

**Procedure for Verification of EPDs**
As per ISO 14025, FPInnovations will ensure that independent third party verifiers review and verify all B-to-C EPDs published under this programme. B-to-B EPDs will be subjected to independent review; however, it is not mandatory for these to be verified by third party verifiers, according to ISO 14025.

The verifier may be an individual or verification body with knowledge of the product category under consideration and related environmental aspects, with process and product knowledge of the product category, and be an expert in LCA and methodology. The verifier shall be competent in relevant standards in the fields of environmental labeling and declarations, the regulatory framework within which requirements for Type III environmental declarations have been prepared, and the Type III environmental declarations program.

The chosen verifier shall as a minimum confirm the following:

a) conformance with the PCR;

b) conformance with the ISO 14040 series of standards;

c) conformance with general program instructions for the Type III Environmental Product Declaration;

d) that data evaluation includes coverage, precision, completeness, representativeness, consistency, reproducibility, sources and uncertainty;

e) the plausibility, quality and accuracy of the LCA-based data;

f) the quality and accuracy of additional environmental information;

g) the quality and accuracy of the supporting information.

The program operator may define additional tasks for the verifier. With regard to EPDs based on previously peer-reviewed LCA, the verifier will perform a background document analysis of the LCA documents to check if the peer-review has been carried out in accordance with the ISO guidelines and ensure that the LCA is in conformance with the PCR.

**Periodic Review of Program Instructions**
FPInnovations will review the program rules at least every three years to ensure the document is up-to-date.

**Maintaining Publicly Available Lists and Records of PCR Documents and EPDs**
FPInnovations will maintain a publicly available list of all PCRs and valid EPDs completed within the program and make that list available to the public via the internet. EPDs are considered to be the property of the manufacturers (or relevant associations, or organizations seeking the EPD). B-to-C EPDs developed under this program will be made publicly available as required by ISO 14025.
**Funding Sources and Other Resources**
Funding sources for FPInnovations’ EPD program development will be made available on request.

**Misuse of the EPD and EPD Program Logo**
PCRs and EPDs developed by FPInnovations on behalf of its clients or for its own use as a Program Operator are subject to standard legal protection as intellectual property. Misuse or misrepresentation, either in part or in whole, of the content of a document developed by FPInnovations, the standards and other documents referenced by a document or program created by FPInnovations, or the FPInnovations program or logo may be subject to legal action.
**Organizations Participated in the Consultation Process**
- BC Forestry Innovation and Investment
- Canadian Forest Service, Natural Resources Canada
- Canadian Manufacturers and Exporters
- Canadian Wood Council
- Centre for Biocomposites and Biomaterials Processing, Faculty of Forestry, University of Toronto
- Cloverdale Fuel Ltd.
- Christine Burow Consulting
- Faculty of Environmental Design, University of Calgary
- Forest Products Association of Canada
- Gypsum Association
- Ingredion Incorporated
- Mercer International
- National Research Council Canada
- Natureworks Inc
- Nexterra Systems Corporation
- Sustainability Edge Solutions
- The Engineered Wood Association