

EPD Australasia Technical Advisory Group Guidance Note December 2020.

GUIDANCE ON THE REVISED CONSTRUCTION PRODUCTS PCR

1. KEY POINTS

- A new Core PCR for Construction Products has been released by The International Environmental Produce Declaration System (IEPDS) which must also be followed for EPDs registered with EPD Australasia.
- The original guidance was that the old and new PCRs would coexist until 2020-09-01, **however, given the technical nature of these changes IEPDS have extended the transition period until 2021-12-31**. Please check the EPD Australasia website for current updates.
- The new PCR includes some significant changes, including some changes to the environmental impact assessment methods. This makes some indicators incomparable between 'old' and 'new' EPDs.
- EPD Australasia recommends that EPDs published to the new PCR also include the old indicators for backwards compatibility, until 2027-01-01¹, given that:
 - The purpose of an EPD is to enable comparability;
 - There are thousands of EPDs published using the 'old' PCR; and
 - There are existing LCA tools (e.g. the ISCA Materials Calculator) designed to use results following the 'old PCR', which may not be able to use the 'new' PCR by this transition date.

¹ To allow a five (5) year period that is inline with the validity period of new EPDs published following the new PCR requirements.

2. PURPOSE

The standard EN 15804 “*Sustainability of construction works. Environmental product declarations. Core rules for the product category of construction products*” has been updated to EN 15804:2012+A2:2019 which has triggered the update of EPD program documents that refer to that standard.

This new standard only relates to Construction Products and Construction Services.

The International EPD System (IEPDS) has notified EPD owners, producers, and users of the transition period to adapt to the new standard which is now until 2021-12-31 (please check the EPD Australasia website for any further changes to the transition period).

The purpose of this guidance is to provide further information on the transition of EPD Australasia to adopt this revised standard.

3. GUIDANCE

The standard EN 15804 “*Sustainability of construction works. Environmental product declarations. Core rules for the product category of construction products*” has been updated to version EN 15804:2012+A2:2019.

This version of EN 15804 has significant changes to the requirements of EPDs. A summary of these changes and links for further information are provided in the sections following.

As a result of these changes, the IEPDS has produced the following new documents to align with the new EN 15804:2012+A2:2019 standard:

- IEPDS Construction Products Product Category Rules (PCR) 2019-12-20 (PCR 2019:14 v1.0)
- IEPDS General Program Instructions (GPI) has been updated to v3.01
- IEPDS EPD template - Construction products, PCR 2019:14 (EN 15804:A2)
- IEPDS EPD Verification Template - Verification report, PCR 2019:14 (EN 15804:A2)

EN 15804:2012+A2:2019

The International EPD System describes the change to EN 15804 on its website² in the article “*How does the International EPD[®] System relate to EN 15804?*” which has been reproduced below:

² International EPD System. (2020). How does the International EPD[®] System relate to EN 15804?
<https://www.environdec.com/contact/FAQ/How-does-the-International-EPD-System-relate-to-EN-15804/>

- *EN 15804[:2019] refers to the European standard EN 15804:2012+A2:2019, “Sustainability of construction works - Environmental product declarations - Core rules for the product category of construction products”.*
- *This standard was developed to function as a “Core PCR” to harmonise environmental declarations across programme operators. The European standard is complementary to ISO 14025[:2010], which provides rules on how to operate a programme for type III environmental declarations.*
- *The International EPD[®] System is actively working towards complying with this standard, through the General Programme Instructions and the relevant PCRs. As the International EPD[®] System has both a geographical scope and scope of product categories that is larger than construction products in Europe, the compliance with the standard is defined on a case-to-case basis for PCRs.*
- *EPDs and PCRs for construction products shall state their compliance or non-compliance with EN 15804[:2019].*
- *There are three types of PCRs currently available for construction products:*
 - *PCR 2019:14 for Construction products. This document is the main option for EPDs compliant with the present version of EN 15804 [:2019].*
 - *Using this document, any construction product may be declared using a declared unit and any system boundaries except “cradle to grave and module D”.*
 - *A complementary PCR (c-PCR) shall be used if a functional unit is to be used.*
 - *Under the transition period, PCR 2012:01 may instead be used, which complies with the old version of EN 15804 (EN 15804:2012+A1:2013). [Given the technical nature of these changes EPD Australasia and IEPDS are currently discussing extending the transition period. Please check the EPD Australasia website for updates.]*
 - *Stand-alone PCRs, compliant with EN 15804.*
 - *PCRs that are independent from PCR 2019:14 or PCR 2012:01, but aligned with EN 15804.*

[By the end of the transition period, EN 15804:2019 should be considered to be the key standard to follow, and thus PCR 2019:14. If you are using a PCR that is not aligned with the main standard and PCR, then any guidance from that PCR that is not in line with the new rules should be considered out-of-date.]

- *Stand-alone PCRs, NOT compliant with EN 15804. These are often legacy PCRs intended to be updated or de-registered after they have expired.*
[Check the best approach with the Secretariat if you encounter one of these.]

WHAT ARE THE MAIN CHANGES TO EN 15804:2019?

The TAG recommends that all consultants and verifiers purchase the new standard and familiarise themselves with the new requirements.

There are broadly five changes to EN15804 that are summarised below³:

1. Cradle-to-gate plus end-of-life

EPDs of construction products and materials must now include modules A1-A3, C1-C4 and D. There are some specific exceptions where cradle-to-gate scope can be used, however, to three specific criteria must all be met to be a valid exception. These criteria are that the product must be physically integrated with other products during installation such that they can no longer be physically identifiable; nor separable at the end-of-life. In addition, the product must not contain any biogenic carbon.

The benefits of recycling at the end-of-life must also be modelled using a formula that is based on the Product Environmental Footprint (PEF) methodology. The EPD Australasia TAG intends to distribute additional guidance when additional information is available.

2. Biogenic carbon content and additional climate change indicators

The biogenic carbon content of construction products leaving the factory gate must be declared for both the product and packaging where it is >5% respectively.

There are also an expanded set of climate change indicators that include biogenic carbon. The climate change indicator has now been divided into several indicators:

- Climate change – total
- Climate change – fossil
- Climate change – biogenic
- Climate change – land use and land use change

3. Expanded and additional environmental indicators

Reporting has been expanded for some indicators:

- Climate change is reported for total, fossil, biogenic, land use and land use change

³ Note that changes to the standard are highlighted within the standard itself – using A1 flags for deletions and A2 flags for additions – to make it easier to follow what changes have been made.

- Eutrophication has been divided into fresh water, marine and terrestrial
- Water use is now reported as deprivation-weighted water consumption - water deprivation potential (WDP). WDP is in addition to the net use of fresh water resource parameter that was already required under EN15804+A1:2013.

Additional indicators have been added:

- Particulate matter emissions
- Ionising radiation, human health
- Eco-toxicity (freshwater)
- Human toxicity (cancer)
- Human toxicity, non-cancer effects
- Land use related impacts/soil quality

Several of the additional indicators must also be published with specific disclaimers for their use.

EPD Australasia recommends that indicators from EN 15804+A1:2013 and EN 15804+A2:2019 are also included in an EPD of construction products for the foreseeable future, to accommodate the users of EPD data (e.g. GBCA, ISCA).

4. Updated characterisation factors

The characterisation factors that must be used for reporting have been revised and updated. Please refer to the standards to see all of the changes.

5. Data format requirements

The updated standard now includes a requirement that the *“documentation format and data sets for the LC inventory data used in the LCA modelling shall use the current ILCD format and nomenclature...”* as defined in the ILCD Handbook.

This requirement has significant implications for LCA software and database providers. Clarification on this requirement is being sought from IEPDS.

WHAT IS THE LIST OF STANDARDS THAT NEED TO BE MET TO COMPLY WITH EN 15804:2012+A2:2019?

The normative references required to achieve compliance to the EN 15804:2012+A2:2019 standard have been updated to include:

- ISO 21930:2017
- ISO 14067:2018
- ISO 14044:2006
- EN ISO 14025:2010
- ISO 15686-8:2008
- ISO 15686-7
- ISO 15686-1
- EN 15978
- EN 15942
- ISO 15686-2
- CEN/TR 15941

4. TREATMENT OF EPDS UNDER DEVELOPMENT

- If an EPD for construction products and services is under development, it can follow the transitional PCR 2012:01 v2.33 or the updated PCR 2019:14 v1.0. Make sure that the EPD is approved and published before the end of the transition period.
- If the EPD for construction products and services is published after the end of the transition period, the EPD shall follow the updated PCR 2019:14 v1.0.
 - a. EPD Australasia recommends that until 2027-01-01⁴, any EPD that follows EN 15804:2012+A2:2019 and PCR 2019:14 also publishes the results according to EN 15804:2012+A1:2013 and PCR 2012:01 under “Other environmental information” in the EPD. This will allow the EPD to be of use to GBCA, ISCA and other stakeholders that cannot easily switch to the new LCIA methodology.

Many of the Sub-PCRs (also referred to as c-PCRs) have been developed or updated to follow the revised version of the core PCR and EN 15804:2019. These c-PCRs can be found on the IEPDS website here: <https://www.environdec.com/PCR/Detail/?Pcr=+14759>

5. TREATMENT OF PUBLISHED EPDS

- *The publication of the new version of the EN 15804 standard, PCRs and/or GPI does not affect the validity of already-published EPDs, which will remain published with the same*

⁴ To allow a five (5) year period that is in line with the validity period of new EPDs published following the new PCR requirements.

validity date as before. Surveillance of EPDs during their validity is based on the same version of the PCR and GPI that was used for the verification of the current valid EPD.⁵

6. FURTHER INFORMATION

For further information and background please refer to:

- How does the International EPD[®] System relate to EN 15804?, International EPD System, <https://www.environdec.com/contact/FAQ/How-does-the-International-EPD-System-relate-to-EN-15804/>
- The International EPD System document Differences between new and old versions of EN 15804, <https://www.environdec.com/contentassets/d4473640b3864211b870bf208c950ec2/differences-between-new-and-old-versions-of-en-15804.pdf>
- The International EPD System news page, <https://www.environdec.com/News-archive/>

EN 15804:2012+A2:2019

- European Standard. 2019. 'EN 15804:2012+A2:2019, Sustainability of construction works - Environmental product declarations - Core rules for the product category of construction products', https://infostore.saiglobal.com/en-us/Standards/EN-15804-2012-A2-2019-337631_SAIG_CEN_CEN_2780524/

THE INTERNATIONAL EPD SYSTEM

- The International EPD System. 2019. 'General Programme Instructions (GPI)'. Version 3.01. Sweden, <https://www.environdec.com/The-International-EPD-System/General-Programme-Instructions/>
- The International EPD System. 2019. 'Construction Products Product Category Rules (PCR) 2019-12-20', (PCR 2019:14 v1.0), <https://www.environdec.com/PCR/Detail/?Pcr=+14759>
- The International EPD System. 2019. 'Construction Products Product Category Rules (PCR) 2012:01', (PCR 2012:01 v2.31), <https://www.environdec.com/PCR/Detail/?Pcr=%208098>
- The International EPD System. 2019. 'EPD template - Construction products, PCR 2019:14 (EN 15804:A2)', <https://www.environdec.com/Creating-EPDs/>

⁵ <https://www.environdec.com/The-International-EPD-System/General-Programme-Instructions/>

- The International EPD System. 2019. 'Mandatory EPD Verification Template for Construction Products - Verification report, PCR 2019:14 (EN 15804:A2)', <https://www.environdec.com/Creating-EPDs/>