

EPD Australasia Technical Advisory Group Mar 2023.

GUIDANCE ON EPDS OF SIMILAR PRODUCTS

1. PURPOSE

The purpose of this document is to provide clarification on EPDs of similar products.

2. BACKGROUND

To ensure that EPDs maintain their technical credibility while providing flexibility, practicality, cost-effectiveness of application¹, EPDs registered within the Australasian region have always been able to contain several sets of results tables, for similar products², within the same EPD document. Currently more than 80% of EPD PDF documents registered with EPDA contain multiple sets of results tables for similar products. Multiple sets of results tables have previously been included for both Product Specific³ EPDs and Average EPDs⁵. This also allows EPD documents to be a reasonable number of pages for the intended audience and use⁴.

The revised versions of the IEPDS General Programme Instructions (v4.0) and the IEPDS Construction Products PCR2019:14 (v1.2.5) both currently remove the option to include several sets of results tables, for similar products, within the same EPD— preferring that EPDs of multiple products are instead separated into individual EPDs or represented with one set of results as an Average EPD⁵.

¹ as required by the overarching principles and requirement of ISO 14025:2010

² Similar products are defined in PCR2019:14 as being those products that are:

- covered by the same PCR, and
- manufactured by the same company, and
- from a single or multiple manufacturing sites, and
- manufactured with the same major steps in the core processes.

³ Product-specific EPDs are referred to in:

- PCR2019:14 v1.11, 4.6.1 as “A product-specific EPD is valid for a defined declared product”
- PCR2019:14 v1.2.5 uses the terms “product-specific” and “specific product” but neither term are defined.
- EN15804:2012+A2:2021 refers to ‘declared product’ and ‘specific product’ but the terms are not defined.
- ISO 21930 as both “product-specific” and “an EPD describing a specific product”. The terms are used but not specifically defined.

⁴ As per IEPDS General Programme Instructions (GPI) v3.01 and v4.0

⁵ Average EPDs are referred to in:

- PCR2019:14 v1.11, 4.6.1 defines Average EPDs as “When the EPD is instead based on an average or representative composition of products”. Sections 4.6.2 and 4.6.3 are also relevant for Average EPDs.
- PCR2019:14 v1.2.5, 4.6.1 does not define the term but indirectly refers to them as being an EPD based on “grouped” results or “an EPD of multiple products based on average results”.
- EN15804:2012+A2:2021 uses the term “product group” and “average product” however they are not explicitly defined. It allows for data to be representative of “a product, product group or construction service provided by one or more suppliers” and “The product group or construction service can contain similar products or construction services”.

EPDA recognise that Average EPDs are important at the early stages of planning of a construction project, however there is need for product-specific EPDs for the selection/sourcing of particular products⁶. The updated PCR2019:14 (v1.2.5) guidelines for grouping or averaging of similar or identical products exceed the requirements outlined in both EN15804:2012+A2:2021 and ISO21930, making it impractical to group similar products. EPDA have identified a need to provide some continuity for EPD owners in our region who still need to efficiently present EPD data for similar products in PDF document form.

EPDA have prepared some specific guidance below on managing these changes.

3. GUIDANCE

- EPDs published by EPD Australasia will need to meet the new requirements of the IEPDS General Programme Instructions (v4.0) and the IEPDS Construction Products PCR2019:14 (currently v1.2.5), except where this guidance note applies.
- EPDA will continue to accept multiple sets of results tables for similar products in a single EPD⁷ document. The results tables may contain product-specific results or results based on averages in line with the construction product PCR2019:14 v1.11 (see below).

Each similar product and corresponding results included in a PDF document for publication, will require a separate EPD registration number. The registration number for each similar product is to be clearly identified; as part of a list of products included in the EPD, and included with the results tables (in the body of the tables and/or in the table captions).

- For average or representative product EPDs, EPDA will also allow the previous guidance in PCR2019:14 v1.11 section 4.6.1 to be followed⁷. This allows the results to be presented for a product group or assortment where the results for A1-A3 (A1-A5 for services) do not differ by more than $\pm 10\%$ for the GWP-GHG indicator. Please refer to PCR2019:14 v1.11 section 4.6.1 for further context and guidance.
- EPDs which include multiple results tables will still comply with the construction products standard EN15804:2012+A2:2019

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- ISO21930:2017, 5.3 as “EPDs derived for similar products from one or more sites of one company or multiple companies using data specific to that product. Average EPDs may also be developed for groups of similar products using averaged environmental performance data”. Further information is provided on Average EPDs in ISO21930:2017 Annex B – Examples of average EPDs.

⁶ As per ISO 21930:2017

⁷ The definitions of types of EPD need to be further clarified, simplified and aligned between relevant standards to ensure they can be clearly communicated.

4. REFERENCES

- IEPDS. 2022. 'PCR 2019:14 Construction Products (EN 15804:A2) (v1.2.5) 2022-11-01'. version 1.2.5. Sweden: The International EPD System. <https://environdec.com/pcr-library/with-documents>.
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