Program Operator Manual

Type III Environmental Declaration Program

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1 Introduction

(1.1) Neutral Third Party. SCS is a neutral third-party certification body and standards developer specializing in the assessment of environmental, safety, sourcing, and quality performance claims.

(1.2) This Manual. This manual provides the general program instructions for use in the operation of the SCS Type III Environmental Declaration Program. These Instructions were developed in accordance with the requirements of ISO 14025 Environmental labels and declarations – Type III environmental declarations – Principles and Procedures, ISO 14040 Environmental management – Life cycle assessment – Principles and framework, and ISO 14044 Life cycle assessment – Requirements and guidelines.

(1.3) Sole Party. SCS is the sole party responsible for the development and administration of this program.

2 References

(2.1) Normative References. Normative references include:

- ISO/IEC 17065:2012 Conformity assessment – Requirements for bodies certifying products, processes and services
- ISO 14020:2022 Environmental statements and programmes for products — Principles and general requirements
- ISO 14021:2016 Environmental labels and declarations – Self-declared environmental claims (Type II environmental labelling)
- ISO 14024:2018 Environmental labels and declarations – Type I environmental labelling – Principles and procedures
- ISO 14025:2006 Environmental labels and declarations – Type III environmental declarations – Principles and procedures
- ISO 14040:2006 Environmental management – Life cycle assessment – Principles and framework
- ISO 14044:2006/Amd1:2017/Amd2:2020 Environmental management – Life cycled assessment – Requirements and guidelines
- ISO 14071:2014 Environmental management – Life cycle assessment – Critical review process and reviewer competencies: Additional requirements and guidelines to ISO 14044:2006

In addition, for following standards are normative for EPDs based on PCRs using these standards:

- ISO 21930:2017 Sustainability in building construction – Environmental declaration of building products
- EN 15804+A2:2019 Sustainability of construction works – Environmental product declarations - Core rules for the product category of construction products

3 Scope of the Program

(3.1) Coverage. This Program covers the establishment of product category rules (PCRs) and the development and administration of environmental product declarations (EPDs). The program is applicable to any product, service or system evaluated using life cycle assessment (LCA) conducted in accordance with ISO 14044. The program includes verification of EPD using PCR developed by SCS, as well as EPD verification using PCR from other program operators.

(3.2) Intended Applicant. Applicants are those seeking the following services individually or combined: PCR establishment; conduct LCA, critically review LCA, verify EPD, and/or issue EPD.

(3.3) Intended Market. The Program is intended for use in any market in which SCS provides services globally.

(3.4) Intended Audience. The intended audience for the EPDs generated under this Program are businesses, government agencies, institutions, consumers, environmental advocacy organizations, and other stakeholders interested in making informed decisions about products and systems based on their environmental performance.

4 Program Development

(4.1) The Program Operator invited the involvement of interested parties, representative of a cross-section of diverse interests, to participate and provide input on this manual. Input received from interested parties was incorporated into this manual. Stakeholders contacted, and the interests represented by the stakeholder, are shown in the table below.

Stakeholder	Interests Represented
American Institute of Steel Construction	Trade association
California Department of General Services (DGS)	Public Agency
FSC	Environmental
Greenwash Action	Consumer
HNI Corporation	Manufacturer
Nucraft	Manufacturer
Steel Market Development Institute (SMDI)	Trade Association
WAP Sustainability Consulting	LCA Practitioner

(4.2) The Program Operator received no external funding for the development of this Type III Program.

5 Program Objectives

(5.1) Objectives. The Program has been established to promote scientifically sound transparency about the environmental and human health impacts of products, based on life cycle assessment conducted in

accordance with ISO 14044; and, to generate Environmental Declarations for products and systems in accordance with ISO 14025 and the applicable PCRs.

The Environmental Product Declaration (EPD) Program has been established to support manufactures' efforts in communicating a product's third-party verified environmental performance in accordance with ISO 14025 and applicable PCRs. EPDs are based on life cycle assessments conducted in accordance with ISO 14044 based on transparent and relevant research for environmental, human and health impacts.

6 Definitions

(6.1) Normative Definitions. Definitions contained in ISO 14025, ISO 14040, and ISO 14044 apply as relevant.

(6.2) Additional Definitions. In addition, the following definitions apply:

1. **Applicant**: An entity that applies for an EPD.
2. **Audit**: A third-party verification of the Client-reported information, conducted as required by the PCR.
3. **Client**: An entity that has agreed to receive the services of the SCS program. This entity may be a new applicant or an existing certified or verified operation.
4. **Decision Maker**: The EPD Reviewer is authorized and responsible for the issuance of EPDs.
5. **Desk Audit**: A Desk Audit may involve a review of documents, test data, and/or other evidence used to verify Client-reported information.
6. **Environmental Product Declaration (EPD)**: This term is often used interchangeably with "environmental declaration", as defined in ISO 14025. In this Program, an Environmental Product Declaration can be issued for specific product system, an industrial system, or service depending on the scope of the assessment.
7. **Internal Audit**: A systematic periodic review and assessment of the objectives and performance undertaken by SCS of a program operated by SCS.
8. **International Organization for Standardisation (ISO)**: An international non-governmental organization that develops and publishes international standards. The organization is comprised of a network of the national standards institutes of 159 countries, with a Central Secretariat in Geneva, Switzerland.
9. **Product Category Rule (PCR).** Set of specific rules, requirements and guidelines for developing Type III environmental declarations for one or more product categories. A PCR can stand for a System Category Rule, in this Program.
10. **Program**: The overall process by which an operation or product is evaluated under a life cycle assessment (LCA) and issued an EPD.
11. **Program Marks:** Program Trademarks (e.g., verification logo) licensed for use to the client by the Program Operator upon issuance of the EPD.
12. **Program Operator**: The body that conducts a Type III Environmental Declaration Program. SCS is herein referred to as the Program Operator.

13. **Quality System**: Documented procedures that are established, implemented and periodically audited to assure that production, handling, management, certification, and other systems meet specified requirements at all levels of the Program Operator.
14. **Records**: Completed forms, journals, reports and minutes that have been completed or created for specific purposes. Incomplete forms or templates are not considered to be records.
15. **Renewal Assessment**: EPDs are valid for a specified time period and the renewal assessment occurs when an EPD has or is about to exceed the validity period. The renewal assessment shall include an update of information in the EPD, if warranted.
16. **Standards**: The normative standards referenced in this document.
17. **Surveillance**: Annual assessment of Client's EPD information to determine whether significant changes have occurred and, if so, to determine if an update to the EPD is warranted.
18. **Suspension**: The temporary removal of an EPD by Program Operator through administration action.
19. **Third Party:** A person or entity that is recognized as being independent of the parties involved as concerns the issue in question.
20. **Termination**: Cancellation of the EPD contract by the Program Operator.
21. **Verified**: Status earned by a client when verification is complete so that marks and logos are granted in accordance with the SCS program.
22. **Withdrawal**: Cancellation of the EPD verification by the Client according to contractual arrangements.

7 Responsibilities of the Program Operator

(7.1) Program Operator Responsibilities. SCS Global Services (SCS) is the Program Operator for the Type III Environmental Declaration Program and shall be responsible for fulfilling the following responsibilities:

- Prepare, maintain and communicate general program instructions (this document in its entirety);
- Publish the names of the organizations involved as interested parties in the program development;
- Ensure that Type III environmental declaration requirements are followed (ISO 14025 Clause 7);
- Implement procedures to safeguard the consistency of data;
- Maintain publicly available lists and records of PCR documents and Type III environmental declarations (www.scsglobalservices.com);
- Adopt existing PCRs and/or publish PCR documents and Type III environmental declarations;
- Monitor changes in procedures and documents of related Type III environmental declaration programs, and revise procedures and documents when necessary;
- Ensure the selection of competent independent verifiers and PCR review panel members;

- Implement a transparent procedure for the PCR review, including the scope of the review, details of the review and constitution of the PCR review panel;
- Implement procedures to avoid misuse of references to ISO 14025, the SCS Type III Environmental Declaration Program, SCS-issued Type III Environmental Declarations and, where relevant, the SCS Program Marks.

(7.2) SCS Quality System. The Program Operator follows procedures consistent with the SCS Quality System. Consistent with the SCS Quality Manual (SCS internal document), Section 4.7, "SCS is solely responsible for its decisions relating to the granting, maintaining, extending, limiting, suspending and withdrawing of certification, validation or verification status under its certification and assessment programs. SCS does not delegate authority for granting, maintaining, extending, suspending or withdrawing certification, validation or verification to an outside person or body."

(7.3) Periodic Review of Instructions. SCS shall conduct a periodic review of these General Program Instructions at least every three years, and make updates as necessary.

(7.4) Resources for Program Development and Operation. As Program Operator, SCS provides funding to support initial and ongoing program development and operation activities. No fees are charged by SCS to interested parties to participate in the open consultation stage of PCR development, to participate on PCR Review Panel, or to comment on a draft PCR document.

8 Program Personnel

(8.1) SCS Program Personnel. Program personnel are part of SCS' Environmental Certification Services division. The department's operations concerning personnel are consistent with SCS Human Resources policies.

(8.2) Program Manager. The Program Manager is responsible for ensuring that the Program is operated in accordance with the applicable standards.

(8.3) SCS LCA Practitioner. The LCA practitioner is responsible for conducting LCAs and generating LCA Reports and EPDs. The LCA practitioner must be familiar with the requirements of ISO 14044 and ISO 14025, competent to perform life cycle assessments consistent with the relevant PCR, and capable of making technical judgments, writing reports, and conducting Client-related communications and other job duties and responsibilities. Terms of reference and/or job descriptions outlining duties and responsibilities are provided to all program personnel. All job descriptions are maintained by the SCS Human Resources. Minimum required competencies for LCA Practitioners include:

- expertise in LCA and methodology for LCA work;
- a degree in a scientific or engineering discipline**;**
- familiarity with relevant standards in the fields of environmental labeling and declarations and LCA (e.g., ISO 14020, ISO 14044, ISO 14025, ISO 21930, EN15804);

- familiarity with the regulatory framework relevant to the Type III environmental declarations (e.g., FTC GreenGuide); and
- knowledge of the SCS Type III Environmental Declarations Program.

Expertise in LCA and methodology for LCA may be demonstrated through experience leading at least 1 critically reviewed LCA/EPD or through 10 hours of LCA-specific training by an LCA Practitioner or Program Manager, followed by a short exam to be prepared by the Program Manager.

(8.4) LCA Practitioners not affiliated with SCS. In some situations, an applicant will have an already completed LCA report by an LCA Practitioner not affiliated with SCS. The LCA Practitioner shall be competent to perform life cycle assessments consistent with the relevant PCR, and capable of making technical judgments, writing reports, and conducting Client-related communications and other job duties and responsibilities. LCA Practitioners shall have led at least 1 critically reviewed LCA/EPD and possess a degree in a scientific or engineering discipline**.** SCS shall request a copy of the resume or CV of the LCA Practitioner to document the Practitioner's qualifications.

(8.5) LCA Critical Reviewers. Critical reviewers of reports of LCAs to ISO 14044 shall be LCA Practitioners. Critical Reviews shall follow the requirements of ISO 14071.

(8.6) EPD Reviewer. The EPD Reviewer is responsible for a final EPD review decision that occurs after the EPD has been verified, but prior to EPD publication. The EPD Reviewer shall not have been involved with any aspects of conducting the LCA, preparing the EPD, or verification of the EPD.

9 Application and Assessment Process

(9.1) Initial Application Documents. Applicants are provided access to an application form on the SCS website.

(9.2) Processing of Application. Once an application is received (by email, phone, etc.), the Program Manager ensures the following:

- ✓ That SCS has the capability to complete the work, the location of the operation and any special requirements such as language used by the applicant;
- ✓ That the Applicant is eligible to receive services of SCS;
- ✓ That the Applicant's product or system is within the scope of the relevant PCR;
- ✓ That the requirements for receiving an EPD have been clearly defined, documented and understood; and
- ✓ That any difference(s) in understanding is resolved prior to project initiation.
- ✓ That SCS undertakes all precautions to ensure conflict of interests are avoided.

Upon completion of the application review, the Program Manager, or designee, shall contact the client to confirm the project scope. This could be in the form of an email, work order, or proposal.

SCS will not accept an application if during the above review it is concluded that SCS does not have capability required to complete the work. The applicant will be informed of such a decision and justification will be provided.

(9.3) Fees. When the designated staff member receives the Application, certification expenses and specific scope of work are determined, and a proposal is sent to the Applicant. ***Fees are not contingent on the results of the LCA conducted or the publication of the EPD.***

(9.4) Project Scoping. Project scoping is completed by the Program Manager, or their designee.

(9.5) Work Order. Once a proposal is accepted by the Applicant and SCS, a Work Order clearly defining the scope of work and the product or system to be assessed and SCS Professional Services Agreement are sent to the Applicant for review and signature.

(9.6) Staff Assignment. Once a signed Work Order is received back from the Client, SCS staff shall be assigned to the project and the first Invoice is sent to the client.

(9.7) Project Commencement. The SCS staff assigned to the project will begin work on the necessary tasks outlined in the sections below according to the type of project procured by the Client.

10 Procedures to Define and Develop Product Category Rules (PCRs)

(10.1) Applicable PCRs. SCS shall conduct LCAs and prepare and issue EPDs in accordance with one or more of the following:

- Privately developed PCRs established by a recognized program operator in accordance with ISO 14025 rules;
- PCRs developed by SCS in accordance with the ISO 14025 rules as described in Section 8;
- ISO 21930:2017 for building and construction products and services in the North American or International market, where no applicable PCR exists;
- EN 15804+A2 for products in the European market, where no applicable PCR exists

(10.2) Open Consultation Process. SCS shall solicit the involvement of interested parties and facilitate their participation in an open consultation process in the development of any PCR, consistent with the requirements of ISO 14025, Clause 6.5. The resources and time required to achieve this consultation goal shall be provided by SCS. Among other procedures:

- Interested parties shall be given at least 30 days to review and access details and sources of information used.
- Interested parties who provide comments shall receive responses to their comments within a reasonable timeframe, generally no more than 60-90 days.

(10.3) Product Categories. Product categories shall be determined in accordance with the procedures of the applicable PCR. For PCRs generated by SCS, product categories shall be defined using industry-recognized parameters.

(10.4) Development and Maintenance of PCRs

- **Contents of PCR.** Each SCS PCR conforms to the content requirements in ISO 14025 and ISO 14044. All PCRs developed by SCS for product categories of building and construction-related products shall follow the LCA methodological requirements of ISO 14044 and the current version of ISO 21930.
- **ACLCA Open Standard.** Upon convening of a committee for a new or updated SCS PCR, each SCS PCR committee will determine the applicability of the ACLCA Open Standard to the PCR in development. As SCS is a global program operator and acknowledges that PCRs may be outside the scope of the ACLCA Open Standard, SCS permits flexibility in the conformance to the ACLCA Open Standard for the development of its PCRs.
- **Period of Validity.** PCRs are valid for five years, unless otherwise specified.

(10.5) PCR Review Panel. A third-party PCR Review panel, made up of a minimum of three subject matter and LCA experts, shall review PCRs developed by SCS. SCS shall ensure reasonable balance among the members of the PCR Review Panel is achieved and potential conflicts of interest are identified. This panel consists of a chair and two additional members. Competence of the PCR verifiers and of the PCR Review Panel is determined in compliance with ISO 14025:2006, Clause 8.2, and includes:

- General background knowledge of the relevant sector, product and product-related environmental aspects;
- Expertise in LCA and methodology for LCA work;
- Familiarity with relevant standards in the fields of environmental labeling, environmental declarations, and LCA;
- Knowledge of the regulatory framework relevant to the scope of the PCR; and
- Knowledge of the program for Type III environmental declarations.

(10.6) Content of PCR Review. The PCR review shall include the following steps:

- ✓ An evaluation of compliance with ISO 14040 and 14044, and ISO 14025;
- ✓ An evaluation of compliance with these general program requirements; and
- ✓ An inclusion of all environmental issues relevant to the product category.
- ✓ The PCR Review Panel shall determine whether substantive revisions are needed, and a new version shall be issued as necessary.
- ✓ The final PCR document includes or incorporates the PCR Review Panel findings, comments and recommendations.

(10.7) Adapting PCRs based on EN 15804 to North America. Some PCRs have been developed based on EN 15804. EN 15804 is a European standard for development of PCRs for construction products in Europe.

ISO 14025, section 6.7.1, encourages Program Operators to facilitate the harmonization of PCRs. In an effort to facilitate harmonization with PCRs based in EN 15804, SCS provides PCR guidance in the form of an Addendum to the original PCR.

The intent of the PCR Addendum is to document additional requirements to the PCR for adapting its use to North America. These PCRs Addendums aim to create consistency and transparency with adapting EN 15804 PCRs for use in North America. This guidance may include use of LCIA metrics and performance standards applicable to North America. These PCR Addendums shall be made publicly available through the SCS website.

Prior to making the PCR Addendum publicly available, it shall be subject to one round of independent review by an external LCA expert.

(10.8) Subsequent Changes to PCRs. Any stakeholder may raise issues at any time for consideration, and changes may be made to the PCR before the validity period has expired if deemed necessary.

(10.9) Public Postings. SCS maintains a publicly available list of completed PCRs and supporting documents as required by ISO 14025. These documents are available through SCS' website, www.scsglobalservices.com. SCS shall request the posting of completed PCRs in applicable publicly available PCR repositories as well.

11 Process to Develop an EPD

(11.1) LCA Study. The LCA Practitioner will conduct an LCA study in conformance with the requirements of the relevant PCR. If an on-site audit was conducted, the LCA practitioner will incorporate the findings of that audit. All LCAs developed by SCS shall follow the LCA methodological requirements of ISO 14044.

(11.2) Default Cut-Off Rules. Unless specified by the PCR, a cut off rule of 1% on either an energy or mass-basis, shall be applied. Any deviations from this requirement shall be justified.

(11.3) Default Estimate Service Life of Construction Works. Unless specified by the PCR, an Estimated Service Life (ESL) of 75-years shall be used for the Use phase of the construction work in a cradle-to-grave LCA.

(11.3) Default LCIA Methodology. The PCR will typically specify the LCIA methodology to be used for reporting of Life Cycle Impact Assessment (LCIA) results. In cases where the PCR does not specify a LCIA methodology, the default LCIA methodology shall following the requirements of the most recent version of ISO 21930. In North America, the default LCIA method is TRACI and in Europe the method prescribed by EN 15804 shall be used. ISO 21930 also provides default LCIA methods for use internationally. More than one LCIA method may be used for reporting in an EPD depending on the intended market for the EPD.

Regardless of the LCIA method used for reporting of results in the EPD, the name of the LCIA method shall be clearly stated in the EPD.

(11.5) LCA Report. A report on the outcome of the LCA (LCA Report) will be prepared by the LCA Practitioner.

(11.6) Production of EPD. The EPD shall be produced based on study results in accordance with the SCS approved EPD template, or at a minimum, in accordance with ISO 14025 requirements Clause 6.7.1. and disclosure requirements of the relevant PCR.

(11.7) Technical Review. The LCA report and EPD go through an internal technical review by the program manager or other senior practitioner before the formal critical review and verification process.

(11.8) Critical Review. The LCA will be critically reviewed by an independent practitioner (see section 12).

(11.9) EPD Verification. The EPD will be verified by an independent verifier (see section 12).

(11.10) Validity Period for EPD. The PCR will typically state the validity period for a verified EPD- in these situations the validity period stated in the PCR shall be used. For EPD produced using a PCR without a specific validity period, the EPD shall be valid for five years.

12 Procedure for EPD Verification

(12.1) Review Required. Each LCA report shall be independently reviewed for conformance to ISO 14044 and any other appropriate ISO standard or PCR in accordance with the requirements of ISO 14071. Each EPD shall be independently reviewed in accordance with the requirements of ISO 14025 and the applicable PCR.

(12.2) Critical Reviewer. Any SCS employee, independent contractor, or outsourced service provider may serve as the Critical Reviewer, provided that s/he: 1) has not been involved in the execution of the LCA or the development of the declaration; 2) does not have a conflict of interest either in terms of his/her employment position or in terms of ownership or brokerage interest in the company whose products are being evaluated; and 3) possesses the required knowledge as defined below, Clause 8.2.2. This includes:

- expertise in LCA and methodology for LCA work;
- a degree in a scientific or engineering discipline**;**
- familiarity with relevant standards in the fields of environmental labeling and declarations and LCA (e.g., ISO 14020, ISO 14044, ISO 14025, ISO 14071, ISO 21930, EN15804);
- familiarity with the regulatory framework relevant to the Type III environmental declarations (e.g., FTC GreenGuide); and
- knowledge of the SCS Type III Environmental Declarations Program.

Expertise in LCA and methodology for LCA may be demonstrated through experience leading at least 1 critically reviewed LCA/EPD or through 10 hours of LCA-specific training by an LCA Practitioner or Program Manager, followed by a short exam to be prepared by the Program Manager.

(12.3) Critical Review. Critical review shall include an assessment of conformance of the LCA report to all applicable criteria from ISO 14044 and additional applicable PCR, following ISO 14071. The SCS critical review checklist templates shall be used.

(12.4) Response to Reviewer Comments. The review statement, comments of the practitioner and responses to all recommendations made by the reviewer shall be included in the LCA report.

(12.5) Independent Verifier. An SCS employee, an independent contractor, or an outsourced service provider may serve as the independent EPD Verifier, provided that s/he: 1) has not been involved in the execution of the LCA or the development of the declaration; 2) does not have a conflict of interest either in terms of his/her employment position or in terms of ownership or brokerage interest in the company whose products are being evaluated; 3) possesses the ability to perform the tasks as defined in ISO 14025, Clause 8.1.4; and 4) possesses the required knowledge as defined below:

- expertise in LCA and methodology for LCA work;
- a degree in a scientific or engineering discipline;
- familiarity with relevant standards in the fields of environmental labeling and declarations and LCA (e.g., ISO 14020, ISO 14044, ISO 14025, ISO 21930, EN15804);
- familiarity with the regulatory framework relevant to the Type III environmental declarations (e.g., FTC GreenGuide); and
- knowledge of the SCS Type III Environmental Declarations Program.

Expertise in LCA and methodology for LCA may be demonstrated through experience leading at least 1 critically reviewed LCA/EPD or through 10 hours of LCA-specific training by an LCA Practitioner or Program Manager, followed by a short exam to be prepared by the Program Manager.

(12.6) Independent Verification of EPD. The independent verifier shall perform verification of data from LCA, LCI and information modules, and additional sources. The verification process shall at a minimum confirm the following:

- conformance with ISO 14020;
- conformance with the PCR;
- conformance with ISO 14040 and ISO 14044;
- conformance with the SCS Type III Environmental Declaration Program Operator manual;
- that data evaluation includes coverage, precision, completeness, representativeness, consistency, reproducibility, data sources, and uncertainty;
- the plausibility, quality, and accuracy of the LCA-based data;

- the quality and accuracy of additional environmental information including verification of any Type 1 or Type 2 claims;
- the quality and accuracy of supporting information.

At the end of the verification process, the EPD Verifier will produce an EPD Verification Report, assessing whether the EPD was prepared in accordance with the PCR and ISO 14025 standard. EPD Verification Reports are available to anyone upon request. EPD Verification Reports shall not include confidential business information.

(12.7) Signature. The EPD must be signed by the EPD Verifier to be considered verified. This may be done electronically.

(12.8) Public Postings. SCS also maintains a publicly available list of verified EPDs and EPD Verification Reports. These documents are available through SCS' website, www.scsglobalservices.com. EPD Verification Reports are available to anyone upon request. The verified EPDs may also be made publicly available by the manufacturer.

13 Mutual Recognition with Other Program Operators

(13.1) Mutual Recognition Agreement. The SCS EPD Program may enter into a Mutual Recognition Agreement (MRA) with other Type III EPD Program Operators to mutually recognize EPDs verified under each other's Program. A necessary step prior to agreement of mutual recognition is for an independent expert to conduct a technical review of the administrative routines, verification procedures, normative standards and other processes and procedures for each Program to ensure that each Programs respective verification procedure for review of LCA results and EPDs are of equivalent quality.

(13.2) Mutual Recognition of Verification. Once a Mutual Recognition Agreement is established, EPDs verified by another EPD Program with a Mutual Recognition Agreement with SCS will be recognized by SCS as also meeting the SCS EPD verification requirements and is eligible for dual-registration of the EPD, following the terms established under the MRA.

14 EPD Updates and Renewal

(14.1) EPD Surveillance. Annual assessment of Client information to determine whether changes to the EPD and renewal are warranted.

(14.2) EPD Renewal. In order for a Client to continue to use an EPD beyond the period of validity data verification will be required. Verification will include documentation updates and analysis. Verification may include on-site surveillance auditing, depending on the nature of information being updated.

(14.3) EPD Updates. The holder of a verified EPD is responsible for informing SCS EPD Program Manager of any significant changes to the information used to generate the EPD. Significant changes include, but are not limited to, changes in EPD LCIA results >5%, or changes to any verified information such as 3rd

party certifications. A revised EPD may be required, necessitating verification of the new information, including a new EPD verification review and preparation of a new EPD verification report. If changes to the EPD require an update to the LCA report, the LCA report may also require a new critical review. Changes of an editorial nature, with the aim to clarify rather than update or change the information, may be made to the EPD without verification if approved by the Program Manager.

15 Publication of Final EPD

(15.1) Publication Permission. Finalized EPDs shall be published with the Client's permission. Permission to publish the EPD may be communicated to SCS by email confirmation, or in writing. EPDs shall not be published until the SCS Professional Services Agreement has been executed. Finalized EPDs shall be posted to the SCS website.

(15.2) Authority. SCS shall not delegate authority for issuing, maintaining, extending, suspending or withdrawing an EPD to an outside person or body.

16 Changes in Program Requirements

(16.1) Program Changes. In the event of changes to program requirements, SCS Program staff will notify affected Clients and personnel within 30 days of the approved changes.

For Program changes relevant to Clients, the Program Manager (or designee) will send an e-mail message within 30 days to all Clients alerting them of the modifications and actions necessary of the approved changes. For all changes, a directive will be sent via e-mail to all relevant program staff alerting them of the modifications along with instructions for implementation as it pertains to their work.

(16.2) Posting on Website. Up-to-date versions of program requirements will also be maintained on the SCS website, www.scsglobalservices.com.

17 Appeals, Complaints and Disputes

(17.1) Appeals, Complaints and Disputes Process. The Program Manager is responsible for following up on all appeals, complaints and disputes in accordance with SCS Corporate Appeal, Complaint and Dispute Investigation Procedure. The Program Manager will notify SCS Quality Assurance Manager of the received appeal, complaint or dispute.

(17.2) Appeals, Complaints and Disputes under Mutual Recognition. For all appeals, complaints and disputes arising for an EPD verified by another Program Operator, the Program Manager is responsible for following up in accordance with SCS Corporate Appeal, Complaint and Dispute Investigation Procedure.

18 Use of Trademarks

(18.1) Trademarks. SCS and SCS' logos are registered trademarks of SCS. No entity shall apply or use the logos in connection with a product or EPD, or represent in any way that the EPD is independently verified by SCS, unless authorized in writing by SCS. SCS and Client shall abide by all relevant provisions as specified by the SCS Professional Services Agreement.

(18.2) Monitoring Misuse of Trademarks. The SCS EPD Program Manager, or designee, is responsible for monitoring and documenting the misuse of EPD Program Marks. Misuse of Program Marks include premature use, incorrect use, false use, unauthorized use after termination, etc. Monitoring of misuse will follow the SCS Corporate Procedure 7, *Logo and Language Usage Procedure*.

(18.3) Mutual Recognition Agreement and Use of Trademarks. EPDs which are verified under a Mutual Recognition Agreement with another Program Operator may be eligible to use the SCS EPD logo. In order to be granted use of the SCS logos, the EPD Declaration Holder shall sign a copy of the SCS Professional Services Agreement, and abide by all relevant provisions. SCS will also provide a copy of the Logo Use Guidelines to the Declaration holder.

19 Records

(19.1) Management of Data and Documentation. SCS manages data and documentation in accordance with the SCS Quality System and internal corporate procedures for Document Control and Record-keeping. All documents and records are stored electronically for at least ten (10) years on SCS' secure server.

(19.2) Managing Data Confidentiality. Client data may include confidential information, including, but not limited to, information which is confidential due to competitive business aspects or intellectual property. Confidential information is not to be made public through the EPD or other means. Any data provided by the client and identified as confidential and provided as part of the LCA or EPD verification process shall not be made publicly available. Verifiers shall not disseminate any information disclosed to them during the review without the permission of the disclosing organization.

SCS safeguards the confidentiality of trade secrets, intellectual property and other proprietary information of its clients obtained in the course of the assessment and verification process through a signed Confidentiality Agreement.

To safeguard the confidentiality of client information, access to project folders are restricted to only individuals involved with the program, including program manager, LCA staff, account managers, and the program director. Restriction to access folders is achieved through the establishment of permission controls on the SCS server. The SCS program manager is responsible for determining who can access these folders so that client information may be protected.

In addition, all personnel employed by SCS, including contracted services, are required to sign a Confidentiality Agreement before gaining access to confidential business or proprietary information pertaining to SCS and its clients. Signed Agreements are kept in the appropriate HR files.

(19.3) Record-Keeping. Accurate, complete, up-to-date and legible records of the following are maintained by SCS.

Personnel records include the following:

- **SCS personnel**: (e.g., staff, contractors, practitioners, peer-reviewers, verifiers): CVs, qualifications, job description (SCS staff, only), training, performance reviews, authorizations, confidentiality agreements (or subcontractor agreements for contract personnel), and declarations of potential conflicts of interest;

Records for outsourced services include the following:

- Contracts, including provisions for conflict of interest and confidentiality, with outsourced service providers;
- Qualifications, which may include records of work experience, applicable training(s), and/or examples of prior work completed.

Client contract records include the following:

- Evaluation and certification Work Orders and Invoices;
- Client SCS Professional Services Agreement (PSA).

Assessment records include the following:

- Data Request Form (DRF);
- Practitioner notes and worksheets;
- LCA Critical Review Report;
- Verification Report.