EPD POLAND · TYPE III ENVIRONMENTAL DECLARATIONS

General Programme Instructions

Rules and procedures governing the EPD Poland Programme — a national programme of Type III environmental product declarations in accordance with EN ISO 14025.

VERSION
6.0

ISSUED
2026-08-28

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Version 5.0 of 2024-12-02

STANDARD
EN ISO 14025
EN 15804+A2

Programme operator · Multicert Sp. z o.o. · ul. Mydlarska 47, 04-690 Warsaw

www.epdportal.org

Document control

The person who prepares this document does not approve it. The same separation of roles governs every declaration verified under the programme: the verifier is never the author of the life cycle assessment, and the person taking the certification decision is never the verifier of the same case.

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Prepared by	Grzegorz Suwara — Programme Director
Reviewed by	Mikołaj Junosza-Szaniawski — EPD Poland Programme Manager
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Revision history

VERSION	DATE	SUMMARY OF CHANGES
2.0	2024-03-01	Programme instructions covering scope, operator responsibilities, procedures, declaration types, software use, PCR development and programme administration.
5.0	2024-12-02	Restructured into six parts; document review, on-site inspection and certification decision separated; management system, impartiality and archiving requirements added; product categories, life cycle modules, PCR hierarchy and certification schemes tabulated.
6.0	2026-08-28	Registration numbering corrected to the format actually used in the public register and language editions defined. Governance bodies reconciled under a single name. Application dates of Regulation (EU) 2024/3110 restated from the Regulation itself and the effect of Article 95(3) explained. Approval block and revision history added. Operator address verified against the KRS register. Clause 1.4 added, stating why the programme remains on EN ISO 14025:2010 after publication of ISO 14025:2026.
6.0 corrigendum	2026-09-20	The English edition of Table 13 was aligned with Article 96 by adding the provisions that apply from 7 January 2025. No programme requirement was changed.

Foreword

This document constitutes the General Programme Instructions of the EPD Poland Programme, setting out the rules and procedures governing the operation of the national system of Type III environmental declarations in accordance with EN ISO 14025:2010.

The EPD Poland Programme is operated by Multicert Sp. z o.o. — a product and services certification body operating in accordance with the requirements of EN ISO/IEC 17065:2012. Verification of environmental declarations is carried out in accordance with EN ISO/IEC 17029:2019.

The EPD Poland Programme covers the following categories of products and services:

- construction products — in accordance with EN 15804:2012+A2:2019;
- electrical and electronic products — in accordance with EN 50693:2019;
- technical and industrial materials — in accordance with EN ISO 14025:2010;
- environmental and process-related services — in accordance with EN ISO 14025:2010;
- food and agricultural products — in accordance with the applicable PCR;
- packaging — in accordance with the applicable PCR;
- other product categories — in accordance with the applicable PCR approved by the programme operator.

This document is organised into six thematic parts:

- Part I: Programme fundamentals — scope, definitions, organisational structure;
- Part II: Operational procedures — review, on-site inspection, decision, publication;
- Part III: Quality management system — requirements of EN ISO/IEC 17065 and EN ISO/IEC 17029;
- Part IV: Product categories and scopes — life cycle modules;
- Part V: Product Category Rules (PCR) — hierarchy and requirements;
- Part VI: Documentation and forms — programme document templates.

Normative references

The following standards and normative documents are referenced in this document:

Core standards for environmental declarations:

- EN ISO 14025:2010 — Environmental labels and declarations — Type III environmental declarations — Principles and
- procedures
- EN ISO 14040:2006 — Environmental management — Life cycle assessment — Principles and framework
- EN ISO 14044:2006 — Environmental management — Life cycle assessment — Requirements and guidelines
- EN ISO 14021:2016 — Environmental labels and declarations — Self-declared environmental claims (Type II
- environmental labelling)

Standards for construction products:

- EN 15804:2012+A2:2019 — Sustainability of construction works — Environmental product declarations — Core rules for
- the product category of construction products
- EN 15978:2011 — Sustainability of construction works — Assessment of environmental performance of buildings —
- Calculation method
- EN ISO 21930:2017 — Sustainability in buildings and civil engineering works — Core rules for environmental product
- declarations of construction products and services

Standards for electrical and electronic products:

EN 50693:2019 — Product category rules for life cycle assessments of electronic and electrical products and systems

Standards for certification and verification:

EN ISO/IEC 17065:2012 — Conformity assessment — Requirements for bodies certifying products, processes and services EN ISO/IEC 17029:2019 — Conformity assessment — General principles and requirements for validation and verification bodies

Standards for environmental footprint:

EN ISO 14046:2016 — Environmental management — Water footprint — Principles, requirements and guidelines ISO 14064-1:2018 — Greenhouse gases — Part 1: Specification with guidance for quantification and reporting of emissions and removals

EN ISO 14067:2018 — Greenhouse gases — Carbon footprint of products — Requirements and guidelines for quantification GHG Protocol — Corporate Standard and Product Life Cycle Standard

European regulations:

Regulation (EU) 2024/3110 (CPR) — Construction Products Regulation Directive 2022/2464 (CSRD) — Corporate Sustainability Reporting Directive Regulation (EU) 2020/852 — EU Taxonomy Regulation Directive (EU) 2024/825 (ECGT) — Empowering Consumers for the Green Transition

Standards for carbon neutrality and circularity:

EN ISO 14068-1:2023 — Climate change management — Transition to net zero — Part 1: Carbon neutrality ISO 59004:2024 — Circular economy — Vocabulary, principles and guidance for implementation

ISO 59020:2024 — Circular economy — Measuring and assessing circularity performance

Terms and definitions

For the purposes of this document, the following terms and definitions apply:

3.1 environmental product declaration (EPD) — a quantified environmental declaration for a product, based on life cycle

assessment and verified by a third party in accordance with EN ISO 14025:2010.

3.2 life cycle assessment (LCA) — compilation and evaluation of the inputs, outputs and potential environmental impacts of a

product system throughout its life cycle, in accordance with EN ISO 14040:2006.

3.3 certification body — a body carrying out certification in accordance with EN ISO/IEC 17065:2012.

3.4 verification — third-party confirmation of the conformity of an environmental declaration with the programme

requirements, carried out in accordance with EN ISO/IEC 17029:2019.

3.5 product category rules (PCR) — a set of specific rules, requirements and guidelines for the development of Type III

environmental declarations for a defined product category.

3.6 programme operator — the body administering the Type III environmental declaration programme in accordance with

clause 6.3 of EN ISO 14025:2010.

3.7 functional unit — quantified performance of a product system for use as a reference unit in the life cycle assessment.

3.8 information module — a defined life cycle stage of a product covered by the environmental declaration in accordance with

EN 15804:2012+A2:2019.

3.9 primary data — data obtained directly from the product manufacturing processes, collected by the manufacturer.

3.10 secondary data — data derived from LCA databases or literature, used where primary data are unavailable.

3.11 Type I observation — a remark concerning conformity that does not affect the validity of the declaration.

3.12 Type II observation — a remark concerning conformity that requires correction before publication.

3.13 critical observation — a material non-conformity preventing publication of the declaration without thorough revision.

Compliance with ISO 14025

The EPD Poland Programme meets the requirements of EN ISO 14025:2010 with regard to:

the principles of a Type III declaration programme (clause 5); the responsibilities of the programme operator (clause 6.3) and the general programme instructions (clause 6.4); the procedure for defining product categories (clause 6.6) and for developing PCR (clause 6.7); the comparability of declarations (clause 6.7.2);

the content of the environmental declaration (clause 7.2) and its updating (clause 7.3); the review and independent verification procedure (clause 8.1), including review of PCR by a third-party panel (clause 8.1.2) and independent verification of the data (clause 8.1.3); the independence and competence of verifiers (clause 8.2); confidentiality of data (clause 8.3).

Environmental declarations developed within the EPD Poland Programme are comparable only within the same product category and where the same PCR has been applied, in accordance with clause 6.7.2 of EN ISO 14025:2010.

Part I · Programme Fundamentals

1. The EPD Poland Programme

1.1. Programme scope

The EPD Poland Programme is a national Type III environmental declaration programme operated in accordance with EN ISO 14025:2010. The programme enables the development, verification and publication of environmental product declarations for a broad spectrum of product and service categories.

The substantive scope of the programme covers the following categories of products and services:

- construction products (concrete, precast elements, steel, timber, insulation, glass, ceramics, roofing, joinery) — in
- accordance with EN 15804:2012+A2:2019;
- electrical and electronic products (household appliances, consumer electronics, lighting, cables, transformers,
- installations) — in accordance with EN 50693:2019;
- technical and industrial materials (plastics, coatings, adhesives, construction chemicals, paints);
- equipment and infrastructure components (HVAC equipment, pumps, fittings, control systems);
- environmental and process-related services (transport, waste management, facility maintenance, construction services);
- food and agricultural products (processed food, beverages, agricultural products);
- packaging (plastic, paper, metal and glass packaging);
- other product categories — in accordance with the applicable PCR approved by the operator.

The programme also offers group and sector declarations as well as Digital EPDs integrated with BIM systems.

1.2. Programme objectives

The principal objectives of the EPD Poland Programme are to:

- provide credible, comparable and verified environmental information about products;
- support informed purchasing decisions based on environmental data;
- facilitate compliance with regulatory requirements (CPR, CSRD, EU Taxonomy, Level(s));
- promote sustainable development in industry;
- enable participation in Green Public Procurement (GPP).

1.3. Legal and normative basis

The EPD Poland Programme operates on the following normative basis:

- EN ISO 14025:2010 — as the base standard for Type III declarations;
- EN 15804:2012+A2:2019 — as the core PCR standard for construction products;
- EN 50693:2019 — as the core PCR standard for electrical and electronic products;

- EN ISO/IEC 17065:2012 — as the basis for the product certification system;
- EN ISO/IEC 17029:2019 — as the basis for the verification process.

1.4. ISO 14025:2026 and the basis on which this programme operates

ISO published the second edition of the base standard — ISO 14025:2026, *Environmental statements and programmes for products — Environmental product declarations (EPDs)* — in June 2026, superseding ISO 14025:2006. This programme continues to operate on EN ISO 14025:2010, deliberately and for two reasons.

- EN 15804:2012+A2:2019, the core product category rules for construction products, makes a **dated** reference to EN ISO 14025:2010. For construction products the basis therefore does not change when a new ISO edition is published; it changes when EN 15804 is revised or its reference withdrawn.
- No Polish equivalent of the 2026 edition has been established, so PN-EN ISO 14025:2010 remains the Polish Standard in force.

Before declarations are issued on the new basis, the programme will carry out a documented analysis of the differences and revise at least these instructions, the verification procedure, the product category rules, the declaration template, the requirements for the LCA report and the register. Transition rules for declarations already published will be issued with that revision. Publication of the 2026 edition does not by itself shorten the period of validity of a declaration issued under clause 6.1.

> **Terminology.** The 2026 edition deprecates the terms “Type III environmental declaration” and “Type III environmental declaration programme” in favour of “environmental product declaration (EPD)” and “EPD programme”. This document uses EPD throughout and keeps the earlier wording only where it names the dated basis on which the programme currently operates.

2. Programme operator

2.1. Role and responsibilities of the operator

Multicert Sp. z o.o. acts as the national operator of the EPD Poland Programme in accordance with clause 6.3 of EN ISO 14025:2010, and this document is the general programme instructions required by clause 6.4 of that standard. Multicert is a product and services certification body operating in accordance with the requirements of EN

ISO/IEC 17065:2012.

Note on accreditation. Multicert Sp. z o.o. is a certification body accredited by the Polish Centre for Accreditation (PCA), accreditation No. AC 210, in the field of certification of construction products (EN ISO/IEC 17065). The operation of the EPD Poland Programme as a Type III environmental declaration programme is conducted in accordance with EN ISO 14025 and EN ISO/IEC 17029; like comparable programme operators internationally (e.g. EPD International, IBU, PEP ecopassport), the programme-operator role is not itself subject to accreditation. That accreditation covers the certification of construction products and says nothing about the programme-operator role or about verification to EN ISO/IEC 17029.

The responsibilities of the programme operator include:

managing and updating the programme procedures; maintaining the register of published environmental declarations; overseeing the verification process in accordance with EN ISO/IEC 17029:2019; publishing approved EPDs on the programme website; managing the competence of verifiers and inspectors;

cooperating with other EPD programme operators; handling appeals and complaints.

2.2. Operator details

TABLE 1 — PROGRAMME OPERATOR DETAILS

PARAMETER	VALUE
Name	Multicert Sp. z o.o.
Status	Operator of the EPD Poland Programme; product and services certification body
Registered address	ul. Mydlarska 47, 04-690 Warsaw, Poland
Email	biuro@multicert.pl
Programme website	www.epd.org.pl / www.epdportal.org
Quality management system	In accordance with EN ISO/IEC 17065:2012; PCA accreditation No. AC 210 (construction products)
Verification	In accordance with EN ISO/IEC 17029:2019

2.3. Organisational structure

TABLE 2 — PROGRAMME ORGANISATIONAL STRUCTURE

BODY / FUNCTION	ROLE	NORMATIVE BASIS
Programme operator	Management, register, publication	EN ISO 14025, cl. 6.3
Technical Committee	Product category rules, programme changes, strategic oversight	EN ISO 14025, cl. 6.5
Technical Committee	Development of PCR, technical guidance	EN ISO 14025, cl. 6.7
Verifiers	Review of LCA and EPD documents	EN ISO/IEC 17029
Inspectors	On-site inspections (extended schemes)	EN ISO/IEC 17065
Impartiality Committee	Oversight of conflicts of interest	EN ISO/IEC 17065, cl. 5.2

Part II · Operational Procedures

3. Document review

3.1. Scope of review

The document review is carried out in accordance with clause 8.1.3 of EN ISO 14025:2010 and with EN ISO/IEC 17029:2019. The verifier assesses the completeness and correctness of the submitted documentation.

3.2. Required documentation

The applicant submits the following documentation:

- the application for registration of the declaration;
- LCA report compliant with EN ISO 14040/14044;
- draft environmental declaration (EPD);
- life cycle inventory (LCI) data on the programme LCI data form;
- documentation evidencing conformity with the applicable PCR;
- a declaration of no conflict of interest.

3.3. Stages of document review

The document review comprises the following stages:

- verification of the completeness of the application and annexes;
- assessment of conformity of the LCA report with the requirements of EN ISO 14040/14044;
- verification of conformity with the applicable PCR (EN 15804+A2, EN 50693 or other);
- checking the correctness of calculations and environmental indicators;
- assessment of data consistency between the LCA report and the draft EPD;
- preparation of the review report.

3.4. Assessment criteria

The verifier assesses the documentation with regard to:

- conformity with the requirements of the applicable PCR;
- methodological correctness of the LCA study;
- data representativeness (geographical, technological, temporal);
- completeness of the declared environmental indicators;
- correctness of the functional unit and system boundaries;
- data consistency between the LCA report and the draft EPD.

3.5. Document review report

The verifier prepares a document review report containing:

- a summary of the scope of the review;

- an assessment of conformity with the PCR requirements;
- a list of identified observations (Type I, Type II, critical);
- a recommendation on further action;
- a deadline for resolving observations (where applicable).

3.6. Handling of observations

3.6.1 Type I observations — remarks concerning minor non-conformities that do not affect the validity of the declaration. The applicant should address them at the next EPD update. They do not suspend the publication process.

3.6.2 Type II observations — remarks requiring correction before publication. The applicant has 14 working days to make corrections and submit the revised documentation.

3.6.3 Critical observations — material non-conformities preventing publication. They require thorough revision of the documentation. The verification process restarts upon submission of corrected documentation.

3.7. Review timeline

The document review is carried out within 15 working days of receipt of complete documentation. Where documentation requires particular analysis, the period may be extended to 25 working days.

4. On-site inspection

4.1. Scope of inspection

On-site inspection is carried out in accordance with EN ISO/IEC 17065:2012, as part of the evaluation of the product. EN ISO 14025 does not require an inspection; the programme applies one in the schemes listed below in order to verify the primary data at source. Inspection is required for the following schemes:

EPD+ Extended Assurance; EPD+ CPR Ready; EPD+ CPR Extended; EPD+ Verified Circularity;

EPD+ Net Zero; OEF (Organisational Environmental Footprint).

4.2. Conditions for conducting an inspection

a positive document review outcome (no critical observations); agreement of the inspection date with the applicant (at least 5 working days in advance); provision by the applicant of access to the production facility;

presence of competent applicant personnel during the inspection.

4.3. Purpose of inspection

The purpose of the inspection is to verify:

the conformity of actual production processes with the data presented in the LCA report; the manufacturer's environmental data management system; the traceability of primary data and the sources of secondary data;

the factory production control (FPC) system insofar as it affects environmental data.

4.4. Conduct of the inspection

4.4.1 Opening meeting — presentation of the purpose and scope of the inspection, agreement of the schedule, identification of key personnel. 4.4.2 Review of production processes — facility visit, observation of processes, verification of conformity with the description in the LCA report. 4.4.3 Data verification — examination of source documentation, purchase invoices, production reports, energy and utility consumption measurements. 4.4.4 Closing meeting — discussion of preliminary findings, identification of any non-conformities, agreement on further action.

4.5. Inspection report

The inspector prepares an inspection report in accordance with EN ISO/IEC 17065:2012, containing:

the scope and date of the inspection; identification of the facility and product; the results of the verification of processes and data;

any non-conformities identified; a recommendation on certification.

4.6. Handling of non-conformities

minor non-conformities — the applicant has 30 days to take corrective action; major non-conformities — a re-inspection is required after corrections;

critical non-conformities — the certification process is suspended.

5. Certification decision and publication

5.1. Basis of the decision

The certification decision is taken in accordance with clause 7.6 of EN ISO/IEC 17065:2012 on the basis of:

the document review results; the on-site inspection results (for extended schemes);

the recommendation of the verifier/inspector.

5.2. Types of decision

approval of the EPD for publication — all requirements met; conditional approval — minor corrections required before publication (7-day deadline); deferral of decision — supplementary documentation or additional inspection required;

refusal of approval — material non-conformities preventing certification.

5.3. Approval process

review of the complete documentation by the decision-maker; verification of the decision-maker's independence from the verification process; issuance of the certification decision; notification of the applicant of the decision.

5.4. Publication of the EPD

The approved environmental declaration is published in the programme register at www.epd.org.pl within 5 working days of the decision date. The EPD is assigned a unique registration number in accordance with

the programme numbering system.

Publication includes:

the EPD document in PDF format; data in digital format (ILCD+EPD, JSON) for Digital EPD schemes;

product and manufacturer metadata; information on the period of validity and the date of the next review.

6. Updating and surveillance

6.1. Period of validity of the EPD

The standard period of validity of an environmental declaration is 5 years. For construction products EN 15804+A2 clause 9 runs that period from the date of issue of the declaration; the programme applies the same rule to every category. EN ISO 14025 fixes no period of validity; it requires in clause 7.3 that declarations be updated. For extended schemes the period of validity may be reduced to 3 years. Project EPDs are valid for 36 months and Design Phase EPDs for 18 months.

6.2. Periodic surveillance

For extended schemes the operator conducts periodic surveillance comprising:

annual review of data currency (desk review);

surveillance inspections every 2 years (for EPD+ Extended Assurance); verification of changes in the production process; data updates in the event of material changes (>10% of environmental impact).

6.3. EPD updates

An EPD update is required in the event of:

a material change in the production process (>10% impact on indicators); a change in product composition;

a change in the applicable PCR; expiry of the period of validity; a request by the applicant.

6.4. Update procedure

The applicant submits an application for an update together with documentation justifying the scope of changes. The operator decides on the scope of verification required:

document review — for minor changes; full verification — for material changes; supplementary inspection — for changes in the production process.

Part III · Quality Management System

7. Management system requirements

7.1. Basis of the system

The quality management system of the EPD Poland Programme complies with the requirements of:

- EN ISO/IEC 17065:2012 — for the certification of products and services;
- EN ISO/IEC 17029:2019 — for the verification of environmental declarations.

7.2. System documentation

- the EPD Poland Programme Quality Manual;
- the Programme Instructions (this document);
- operational procedures;
- forms and document templates;
- records of certification activities.

7.3. Separation of functions

In accordance with EN ISO/IEC 17065:2012, the following functions may not be performed concurrently by the same person:

TABLE 2A — SEPARATION OF FUNCTIONS

FUNCTION A	FUNCTION B (NOT PERMITTED)	BASIS
EPD verifier	Author of the LCA report for the same declaration	EN ISO/IEC 17029, cl. 5.3.9
EPD verifier	Provider of consultancy on the same declaration, for 2 years	EN ISO/IEC 17029, cl. 7.2.5; the period is set by this programme
Inspector	Adviser to the client on the same case, for 2 years	Programme rule, adopted under EN ISO/IEC 17065, cl. 4.2
Decision-maker	Verifier or inspector of the same case	EN ISO/IEC 17065, cl. 7.6.2
Composition of the impartiality mechanism	Domination by any single interest, including the operator’s own personnel	EN ISO/IEC 17065, cl. 5.2

8. Safeguarding impartiality

8.1. Impartiality Committee

The impartiality of the EPD Poland Programme is overseen through the application of EN ISO/IEC 17065:2012. Multicert Sp. z o.o. holds Polish Centre for Accreditation accreditation No. AC 210 (construction products), which constitutes independent confirmation of compliance with impartiality

requirements at the certification-body level. The Impartiality Committee operates in accordance with clause 5.2 of EN ISO/IEC 17065:2012. Its responsibilities include:

- overseeing the programme's impartiality policy;
- reviewing potential conflicts of interest;
- handling appeals and complaints;
- approving the principles for remunerating personnel.

8.2. Impartiality principles

separation of the verification function from advisory functions;

rotation of verifiers (maximum 3 consecutive certifications for the same client); declarations of no conflict of interest; financial independence from certification outcomes; review of impartiality by the Committee.

9. Change management and archiving

9.1. Change management

identification of the need for change (internal or external); development of the draft change by the Technical Committee; consultation with interested parties (minimum 30 days);

approval of the change by the Technical Committee; publication and communication of the change.

9.2. Document archiving

TABLE 3 — DOCUMENT RETENTION PERIODS

DOCUMENT TYPE	RETENTION PERIOD
Certification documentation (applications, reports)	10 years from expiry of EPD validity
Inspection reports	10 years from the inspection date
Certification decisions	15 years from the decision date
Appeals and complaints documentation	10 years from case closure
Internal audit records	5 years

9.3. Appeals procedure

The applicant has the right to appeal against a certification decision within 14 days of receipt. The appeal is considered by the Impartiality Committee within 30 days. The Committee's decision is final.

10. Technical Committee

10.1. Composition and competence

The Technical Committee comprises representatives of interested parties and operates in accordance with clauses 6.5 and 8.1.2 of EN ISO 14025:2010. A PCR review panel consists of a chair and at least two members, as required by clause 8.1.2. The Committee approves:

new PCR and changes to existing PCR;

changes to programme procedures; the strategic direction of the programme; cooperation with other EPD programmes.

10.2. ISO 14025 requirements

The EPD Poland Programme meets the following requirements of EN ISO 14025:2010:

independence and competence of verifiers and of the PCR review panel (cl. 8.2); consultation with interested parties when developing PCR (cl. 6.5 and 6.7); publicly available lists and records of PCR documents and declarations, published in the register at www.epd.org.pl (cl. 6.3 e and 6.3 f);

a procedure for defining product categories (cl. 6.6) and for developing PCR (cl. 6.7); requirements for the comparability of declarations (cl. 6.7.2); updating of declarations (cl. 7.3); confidentiality of client data (cl. 8.3). Complaints and appeals are handled under clause 7.13 of EN ISO/IEC 17065:2012, which EN ISO 14025 does not itself govern.

Part IV · Product Categories And Scopes

11. Product categories

11.1. Classification under ISO 14025

The EPD Poland Programme defines product categories in accordance with clause 6.6 of EN ISO 14025:2010. The category codes below classify declarations by product category; they do not form part of the registration number defined in clause 16. The table below presents the main product categories covered by the programme:

TABLE 4 — PRODUCT CATEGORIES IN THE EPD POLAND PROGRAMME

CATEGORY CODE	CATEGORY NAME	CORE PCR STANDARD
CONC	Concrete and mortars	EN 15804+A2, EN 16757
STEE	Steel products	EN 15804+A2
WOOD	Timber and wood products	EN 15804+A2, EN 16485
INSU	Insulation materials	EN 15804+A2
GLAS	Glass and glass products	EN 15804+A2
CERA	Ceramic products	EN 15804+A2
ROOF	Roofing	EN 15804+A2
ELEC	Electrical and electronic products	EN 50693
CHEM	Construction chemicals	EN 15804+A2
HVAC	HVAC equipment	EN 15804+A2, EN 50693
FOOD	Food products	ISO 14025 + applicable PCR
PACK	Packaging	ISO 14025 + applicable PCR
SERV	Services	ISO 14025 + applicable PCR
OTHR	Other categories	ISO 14025 + applicable PCR

12. Life cycle modules

12.1. Module structure for construction products

For construction products (in accordance with EN 15804+A2) the following structure of information modules applies:

TABLE 5 — LIFE CYCLE MODULES FOR CONSTRUCTION PRODUCTS

MODULE	STAGE	DESCRIPTION	STATUS
A1	Production	Raw material extraction and processing	Mandatory
Module	Stage	Description	Status
A2	Production	Transport to manufacturer	Mandatory
A3	Production	Manufacturing	Mandatory
A4	Construction	Transport to site	Optional
A5	Construction	Installation/assembly	Optional
B1	Use	Use	Optional
B2	Use	Maintenance	Optional
B3	Use	Repair	Optional
B4	Use	Replacement	Optional
B5	Use	Refurbishment	Optional
B6	Use	Operational energy use	Optional
B7	Use	Operational water use	Optional
C1	End of life	Deconstruction	Mandatory
C2	End of life	Waste transport	Mandatory
C3	End of life	Waste processing	Mandatory
C4	End of life	Disposal	Mandatory
D	Beyond system boundary	Recycling and energy recovery potential	Mandatory

12.2. Module requirements by scheme

The table below states the modules for the base schemes. A scheme that extends another — EPD+ Extended Assurance, EPD+ CPR Extended, EPD+ Verified Circularity — requires the modules of the scheme it extends, together with the additional assessment that defines it. Project, Design Phase, Sector and Digital declarations follow the modules of the applicable product category rules.

TABLE 6 — REQUIRED MODULES BY BASE SCHEME

SCHEME	REQUIRED MODULES
EPD Standard	A1-A3 (minimum)
EPD Construction	A1-A3, C1-C4, D (mandatory)
EPD+ CPR Ready	A1-A3, C1-C4, D + A4-A5, B1-B7 (where relevant)
EPD Electrical	Full life cycle in accordance with EN 50693
EPD+ Net Zero	Full life cycle A1-D + carbon neutrality per ISO 14068-1 (reductions prioritised over offsetting)

Part V · Product Category Rules (Pcr)

13. PCR hierarchy

13.1. Three-tier structure

The EPD Poland Programme applies a three-tier hierarchy of product category rules:

Tier 1 — Core PCR (cPCR), normative: European standards constituting the core product category rules for specific sectors. These are mandatory documents whose use does not require additional approval by the operator.

TABLE 7 — NORMATIVE CPCR (TIER 1)

STANDARD	SCOPE	PRODUCT CATEGORIES
EN 15804+A2	Construction products (general)	All construction products
EN 50693	Electrical and electronic products	Appliances, electronics, lighting, cables
EN 16908	Cement and building lime	Cements, lime
EN 16757	Concrete products	Precast elements, structural components
EN 16485	Round and sawn timber	Structural timber

Tier 2 — EPD Poland programme cPCR: Documents developed by the programme operator for product categories not covered by European standards. Subject to approval by the Technical Committee.

TABLE 8 — EPD POLAND PROGRAMME CPCR (TIER 2)

REFERENCE	SCOPE	STATUS
cPCR-PL-FOOD-001	Food products	In development
cPCR-PL-PACK-001	Packaging	In development
cPCR-PL-SIGN-001	Vertical road signs	In force
cPCR-PL-AGGR-001	Natural aggregates	In force

Tier 3 — Detailed sub-PCR: Documents specifying cPCR requirements for narrow product categories. Developed at the request of interested parties.

13.2. Procedure for developing a new cPCR

notification of the need to develop a cPCR by an interested party;

appointment of a working group by the Technical Committee; development of the draft cPCR; public consultation (minimum 60 days); consideration of comments and development of the final version; approval by the Technical Committee;

publication and implementation.

14. PCR requirements by scheme

The table below states the product category rules for the base schemes. Every other scheme applies the product category rules of the scheme it extends or, where none applies, programme cPCR approved for the category.

TABLE 9 — PCR REQUIREMENTS BY BASE SCHEME

SCHEME	REQUIRED PCR	NOTES
EPD Standard	ISO 14025 + applicable cPCR	Requires category definition
EPD Construction	EN 15804+A2 + sub-PCR	Modules A1-A3, C, D mandatory
EPD Electrical	EN 50693 + sub-PCR	Full life cycle
EPD+ CPR Ready	EN 15804+A2 + CPR requirements	Additional CPR requirements
Other categories	Programme cPCR or recognised PCR	Requires approval

Part VI · Documentation And Forms

15. Programme documents and forms

15.1. The programme document set

These General Programme Instructions are the top-level document of the programme, required by clause 6.4 of EN ISO 14025:2010. They are issued together with the annexes and the product category rules document listed below, all of which are published on www.epd.org.pl.

TABLE 10 — PROGRAMME DOCUMENTS

DOCUMENT	TITLE	EDITION
GPI-EPD-PL-001	General Programme Instructions (this document)	6.0 · 2026-08-28
Annex 1 to the GPI	Verifier competence requirements and impartiality	01/01/2024
Annex 2 to the GPI	LCA (A) and EPD (B) checklist	01/02/2024
—	Core product category rules for the EPD Poland Programme	2.0 · 2024-03-01

15.2. Forms in use

The forms below are the templates currently issued by the programme. Records for which no separate form is issued are kept in the certification file for the case.

TABLE 10A — PROGRAMME FORMS

REFERENCE	FORM NAME	EDITION	USE
FOR-EPD-PLUS-01	Application	2.1	Initiating the process under the EPD+ schemes
FOR-EPD-PLUS-02	Checklist	3.0	Documenting the review under the EPD+ schemes
—	LCI data form, EPD Poland Programme	current	Submission of life cycle inventory data
W1	Application for approval of a verifier	current	Admitting a verifier to the panel
F-ZMIANA	Application to change the scope of certification	current	Reporting changes to a certified product

15.3. Control of forms

Forms are issued and withdrawn by the programme operator. The edition in force is the one published or issued to the client at the time the case is opened; a change of edition during a case does not invalidate records already made on the previous edition. Annex 2 to these instructions is the checklist against which the verifier records the review.

16. EPD numbering system

16.1. Number structure

Every declaration published under the programme is assigned a registration number of the following structure:

```
EPD-P NN.MM.YYYY
```

where:

- EPD-P — programme prefix, followed by a single space;
- NN — sequential number of the declaration within the month of registration (two digits);
- MM — month of registration (two digits);
- YYYY — year of registration (four digits), the three separated by full stops.

The number is assigned with the certification decision and does not change for the period of validity of the declaration. The number as printed on the declaration is the number of record; it is repeated in the public register and on the verification certificate. The month and year in the number are those of registration; the date of publication of the declaration may fall later.

> **The number is not a file name.** Where a document file name, an index entry or a register field shows the prefix joined by a hyphen or an underscore, or the date components separated by hyphens, that is a naming convention for storage and not the registration number. The number of record is the one printed on the declaration.

16.2. Language editions

Where the same declaration is published in more than one language, the editions share the base number and the edition in a language other than English carries the ISO 639-1 language code as a suffix, separated by a hyphen:

```
EPD-P 02.05.2026 · EPD-P 02.05.2026-PL
```

Language editions are not separate declarations. They cover the same product, the same life cycle assessment and the same verification, and they expire on the same date. Declarations issued before the language suffix was introduced may show the base number in every edition, and some carry the suffix joined by an underscore; those numbers are not reissued. The public register displays the base number for every edition, so two entries under one number are two editions of one declaration, not two declarations.

16.3. Examples of registration numbers

- EPD-P 01.11.2025 — first declaration registered in November 2025;
- EPD-P 03.06.2025 — third declaration registered in June 2025;
- EPD-P 02.05.2026-PL — Polish edition of declaration EPD-P 02.05.2026.

17. Certification schemes

17.1. Overview of schemes

TABLE 11 — PRODUCT DECLARATION SCHEMES

SCHEME	DESCRIPTION	NORMATIVE BASIS
EPD Standard	Basic environmental declaration	EN ISO 14025
EPD Construction	EPD for construction products	EN 15804+A2
EPD Electrical	EPD for electrical products	EN 50693
EPD+ Extended Assurance	EPD with on-site inspection	EN ISO/IEC 17065
EPD+ CPR Ready	EPD covering the Annex II environmental characteristics, with on-site inspection, for manufacturers preparing for the CPR	CPR 2024/3110, EN ISO/IEC 17065
EPD+ CPR Extended	As above, with surveillance over the period of validity	CPR 2024/3110, EN ISO/IEC 17065
EPD+ Verified Circularity	EPD with circularity performance assessment	EN ISO 14025, ISO 59020:2024
EPD+ Net Zero	EPD with carbon neutrality verification	EN ISO 14068-1:2023
Project EPD	Declaration for a specific construction project; valid 36 months	EN ISO 14025
Design Phase EPD	Declaration for a product at the design stage; valid 18 months	EN ISO 14025
Sector EPD	Sector environmental declaration	EN ISO 14025
Digital EPD	Digital EPD integrated with BIM	EN ISO 14025, ILCD+

TABLE 12 — ORGANISATIONAL SCHEMES AND ANALYTICAL SERVICES

SCHEME	DESCRIPTION	NORMATIVE BASIS
OEF	Organisation environmental footprint	ISO 14072:2024
CFP Organisation	Organisation carbon footprint	GHG Protocol, ISO 14064-1:2018
CSRD Ready	Verified data for reporting under CSRD and ESRS	ESRS E1-E5
LCA Study	Full LCA study	ISO 14040/14044
Carbon Footprint	Product carbon footprint	ISO 14067
Water Footprint	Product water footprint	ISO 14046

18. European regulations

18.1. Where declarations from this programme are used

Declarations issued under the EPD Poland Programme are used as a source of verified life cycle data in the following European frameworks. In none of them does a declaration by itself establish conformity; it supplies data that the manufacturer or the reporting entity then uses.

Regulation (EU) 2024/3110 (CPR). Article 15(2) requires the declaration of performance and conformity to cover the environmental sustainability performance of the product over its whole life cycle against the pre-determined environmental essential characteristics listed in Annex II. Annex II sets out nineteen such characteristics, lettered (a) to (s) — the same indicator set as EN 15804+A2 — and recital 7 states that the Commission is to make available the characterisation factors applicable in accordance with the European standard EN 15804 or future applicable standards.

> **What this means for a declaration issued under this programme.** Article 15(2) also requires that those environmental performance values be calculated using the latest version of the software made available free of charge on the Commission's website, and that a software update becomes mandatory one year after its publication. An environmental product declaration verified under this programme is therefore a source of verified life cycle data and evidence of the underlying primary data; it does not replace the declaration of performance and conformity, and its indicator values are not automatically the values to be entered there. Preparing the declaration of performance and conformity, and calculating its environmental characteristics with the Commission's software, remain the manufacturer's responsibility.

Directive (EU) 2022/2464 (CSRD). Verified product data are used in reporting under ESRS E1–E5, in particular for value chain emissions.

Regulation (EU) 2020/852 (EU Taxonomy). Declarations serve as a data source when assessing technical screening criteria and do not, on their own, evidence that an activity is taxonomy-aligned.

Level(s). Declarations for construction products supply data for the indicators of the European framework for sustainable buildings.

18.2. Dates set by the Construction Products Regulation

The dates below are those of Regulation (EU) 2024/3110 itself. The programme does not set them and does not shorten them.

TABLE 13 — APPLICATION OF REGULATION (EU) 2024/3110

WHAT APPLIES	FROM
Articles 1–4; Article 5(1)–(7); Article 7(1); Articles 9 and 10; the first subparagraph of Article 12(1); Article 16(3); Article 37(4); Article 63; Articles 89 and 90; and Annexes I–IV, VII, IX and X	7 January 2025
The remaining provisions of the Regulation, other than Article 92	8 January 2026
Annex II characteristics (a)–(d): climate change — total, fossil, biogenic, land use and land use change	8 January 2026
Penalties under Article 92	8 January 2027
Annex II characteristics (e)–(m): ozone depletion, acidification, eutrophication, photochemical ozone formation, resource use, water use	9 January 2030
Annex II characteristics (n)–(s): particulate matter, ionising radiation, ecotoxicity, human toxicity, land-related indicators	9 January 2032

Those dates do not mean that every construction product falls under the new obligations at once. Article 95(9) provides that the requirements and obligations of Chapters I, II and III apply to a given product family or product category one year after the adoption of the implementing act under Article 5(8) that makes a harmonised standard mandatory, or after the adoption of the act under Article 6(1) covering that family, unless the implementing act sets a later date. Until then, under Article 95(3) the harmonised standards referenced under Regulation (EU) No 305/2011 and in force on 8 January 2026 remain valid under that Regulation until the Commission withdraws them, and under Article 95(8) the corresponding provisions of Regulation (EU) No 305/2011 continue to apply to products covered by them.

Article 95(9) also allows economic operators to apply a new harmonised technical specification from the date it enters into force, ahead of the one-year period, by carrying out the procedure leading to a declaration of performance and conformity. A manufacturer who wants the life cycle data in place before the obligation reaches its product family can therefore act early, which is what the CPR-oriented schemes of this programme are intended to support.

18.3. What the programme does in response

- declarations covering the Annex II characteristics are prepared to EN 15804+A2, so the indicator set matches the one the Regulation refers to;
- the EPD+ CPR Ready and EPD+ CPR Extended schemes are offered for manufacturers who need the life cycle data before the harmonised specification for their product applies;
- the programme monitors the CPR work plan and the adoption of harmonised technical specifications, and updates the applicable PCR accordingly.

END OF DOCUMENT GPI-EPD-PL-001, VERSION 6.0