

EPD POLSKA PROGRAMME · OPERATED BY MULTICERT SP. Z O.O.

# General Programme Instructions

Rules for the preparation, independent verification and publication of Type III Environmental Product Declarations and product carbon footprints.

## **Version 2.0 — English translation**

Faithful translation of the official Polish "Ogólna instrukcja programu EPD Polska", v2.0 (issued 01.03.2024).

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## 1. Scope of the EPD Polska programme

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The EPD Polska programme, operated by Multicert Sp. z o.o., is an initiative focused on providing accurate information on the environmental impact of various products and services. The programme is based on international and European standards such as ISO 14025, EN 15804+A2, ISO 14067:2018 and EN 50693:2019, enabling comparable, scientifically grounded environmental declarations.

The programme operates within the current EU regulatory context: the Construction Products Regulation (Regulation (EU) 2024/3110) and its move toward mandatory environmental information for construction products; the Ecodesign for Sustainable Products Regulation (ESPR) and the Digital Product Passport; and the EU rules on environmental claims, for which independently verified EPDs and product carbon footprints provide substantiation.

A key strength of the programme is its flexibility, allowing adaptation to many sectors and product types — including construction products, electrical/electronic products and other goods and services. Supported by independent and objective assessment by Multicert, the programme is a key tool for organisations seeking to minimise their environmental impact and evidence the sustainability of their operations.

## 2. Purpose

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The main purpose of the EPD Polska programme is to increase the transparency of information and support informed stakeholder decisions, in particular:

- **Increasing environmental transparency** — disseminating accurate and reliable information on the environmental impact of products and services.
- **Development & scalability of EPD** — facilitating the preparation and verification of Type III Environmental Product Declarations to ISO 14025, to increase market uptake.

- **Quality & credibility of EPD** — applying rigorous verification and quality-control standards in line with international standards and regulations.
- **Global compliance & alignment** — enabling companies to support sustainable practices across industry sectors.

### 3. Multicert — National Programme Operator

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#### 3.1 Responsibilities of the operator

Multicert, as operator of the EPD Polska programme, plays a key role in managing and running the Type III environmental declaration programme. This responsibility requires not only adherence to the established standards and procedures, but also active engagement in developing and maintaining sustainability standards. The main areas of responsibility are:

- **Development & updating of guidelines** — preparing, maintaining and regularly updating the programme guidelines to keep them aligned with the latest environmental standards.
- **Transparency & availability of information** — managing and publishing current lists of involved organisations and programme documentation, including PCR documents and EPDs.
- **Ensuring compliance & credibility of declarations** — guaranteeing that all declarations comply with the defined criteria and standards, through scrupulous verification of the data.
- **Monitoring & updating of procedures** — monitoring changes in procedures and programme documents and introducing necessary updates.
- **Selection of verifiers** — selecting competent and independent verifiers and PCR-review members to ensure objective, reliable assessment.
- **Registration in EPD Polska** — registering and maintaining declarations on the EPD Polska portal.
- **Prevention of misuse** — implementing and enforcing procedures to prevent improper reference to the international standard, the EPD programme, its declarations and logo.
- **Training, promotion & education** — running regular training for producers, verifiers and stakeholders, and promoting the benefits of EPD certification.

#### 3.2 Operator team

- **Programme Manager** — supervises the entire EPD process from product application to publication; manages internal and external verifiers, analyses results and takes final verification decisions on behalf of the Multicert certification body within the EPD Polska programme, in accordance with ISO 14025 §6.3.
- **EPD Specialist** — prepares or assesses draft declarations, cooperates with producers and consultants, and monitors updates to the General Programme Instructions and PCR.
- **Data Coordinator** — gathers, analyses and manages the data required for LCA and declarations, and safeguards data security and confidentiality in line with ISO 14040 and ISO 14044.
- **EPD Portal Administrator** — manages the online platform for publishing declarations and communicates with portal users, in line with ISO 14025.
- **Technical Forum** — independent experts responsible for developing PCR (Product Category Rules) and general programme instructions, ensuring consistency and comparability across products and sectors per EN 15804+A2, EN 50693:2019, ISO 21930:2017 and EN ISO 14067:2018.
- **Impartiality Committee** — safeguards the independence of LCA and EPD assessment, ensuring objective evaluation free of conflicts of interest, in line with ISO 14025, EN 15804, EN 50693 and EN

ISO 14067 third-party verification principles.

## 4. Programme procedures

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Delivering a product environmental profile requires close cooperation between the client and Multicert as programme operator. To ensure clarity and effectiveness, Multicert applies a dedicated procedure covering all key steps.

### 4.1 Client application

The client (the product manufacturer) applies for EPD certification of their product via the form on [www.epd.org.pl](http://www.epd.org.pl) or directly through the Data Coordinator. Data required upon enquiry:

- Full product information: name, description, application and technical specification.
- Preliminary life-cycle data: raw materials, production processes, transport, use and disposal.
- Any earlier studies or analyses of the product's environmental impact.

On receipt, the Data Coordinator performs a preliminary assessment and contacts the client to confirm the application. The client and Multicert sign an agreement defining the declaration categories, product type(s), timelines, costs and mutual obligations.

### 4.2 Data collection & preliminary analysis

The Data Coordinator collects detailed product information (technical documentation, raw-material specifications, production-process descriptions) and verifies all data for completeness, consistency and accuracy; any discrepancies are returned to the client for correction. A preliminary analysis identifies key environmental aspects and the appropriate PCR category. The client may engage independent specialists or external consultants to carry out the LCA, ensuring objectivity. The process follows international LCA standards ISO 14040 and ISO 14044.

### 4.3 Data verification & draft EPD

On completion of the LCA study, an independent verification is initiated, covering the LCA data, life-cycle inventory (LCI), information modules and additional environmental data. It is performed by carefully selected verifiers whose competence and independence meet documented requirements (ISO 14066) and are independently certified to EN ISO/IEC 17024 through ERCA (European Register of Certificated Auditors), co-founded and operated by Multicert as ERCA Poland, with impartiality safeguarded by the Impartiality Committee and by the separation of preparation from verification. Where an EPD is assessed, LCA and EPD verification are carried out together. Verification follows the checklist in Annex 2 and confirms conformity with §8.1.2 of PN-EN ISO 14025. Based on the accepted LCA, the independent EPD Specialist prepares or supervises the draft EPD per the PCR; the draft is consulted with the client, corrected, finalised and prepared for external verification.

### 4.4 External EPD verification

To ensure objectivity and credibility, Multicert relies on independent external verifiers, selected on the basis of experience, qualifications and product/LCA specialisation (Annex 1). The EPD Specialist or client provides the draft EPD and all related documents to the verifiers, who analyse the materials against the applicable standards, raise questions, document findings and prepare a final verification report (Annex 2) confirming the EPD's conformity and credibility. Results are communicated to the client.

#### 4.5 Publication on the EPD Polska portal

On a positive verification report, the Portal Administrator prepares the EPD for publication, enters it into the EPD Polska system with metadata (product category, manufacturer, verification date, validity term) and informs the client of the planned publication date. After official publication the EPD is available to all portal users. A verified, published EPD may use the EPD POLSKA logo and the verified-EPD logo in accordance with the relevant PCR (e.g. PN-EN ISO 14025, PN-EN 15804 / EN 50693 / EN 14067; EN and ISO editions are permitted as alternatives).

#### 4.6 Monitoring & updating

After publication the Portal Administrator monitors activity and user feedback. An annual review checks changes in production, availability of new data and user comments. Where significant changes are identified, the EPD is updated (re-LCA, data correction, external verification) and the new version replaces the previous one; registered users who downloaded the earlier version are notified. Previous versions are archived, not deleted. **Each EPD has a defined validity period — standardly 5 years**, after which it loses validity and may not be used for marketing, certification or other purposes until renewed.

### 5. EPD types & product classification

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The programme allows both individual producers and groups of producers (e.g. industry associations) to declare the environmental impact of their products. It distinguishes individual and group declarations, and several declaration types:

EPD type	Description
<b>Specific EPD</b>	Declaration for one specific product from one production site; detailed environmental information for a single product.
<b>Average EPD</b>	Averaged impact for a product or product series across several production sites or similar products.
<b>Representative EPD</b>	Based on a product typical of a given product class, with the impact deemed representative of the whole group (must be duly justified).
<b>Model EPD</b>	Refers to the product with the highest potential environmental impact ("worst case"); serves as a conservative benchmark.

All of the above may be treated as non-public (confidential) EPDs — third-party-verified declarations not published in public registers, for companies that for strategic/competitive reasons keep impact information confidential. Group (sector / association) declarations allow products to be declared collectively; producers and product names included in the LCA must be listed in the EPD background report. Producers may customise group declarations (limited or extended personalisation) under defined conditions, with model-based personalised EPDs subject to a simplified verification.

#### 5A. Product carbon footprint (ISO 14067)

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Alongside full Type III EPDs, the programme issues independently verified **product carbon footprints (PCF)**. A PCF is quantified to **ISO 14067:2018**, with the underlying life-cycle assessment to **ISO 14040/14044**; it is climate-focused (a single impact category) rather than a full multi-indicator EPD.

**Calculation basis.** The result is expressed as global-warming potential in **kg CO<sub>2</sub>e per declared unit** (e.g. 1 piece, 1 t, 1 m<sup>2</sup>), characterised using **IPCC GWP-100** factors (AR6). Where a **PCR or c-PCR** exists for the product, its carbon-relevant calculation rules apply (the same core rules as EN 15804+A2:2019+A1:2021 and any sector c-PCR used in the EPD programme); where none exists, the system boundary is set per ISO 14067 and these Instructions. Reported life-cycle modules are typically cradle-to-gate (**A1–A3**) with optional distribution (**A4**); **biogenic carbon is reported separately** and is not netted into the fossil GWP-total. Cut-off and allocation rules follow the LCA standards and the applicable PCR.

**Data.** Primary data is supplied by the manufacturer (raw materials, inbound transport, production energy and waste, and optionally distribution); background emission factors are taken from recognised life-cycle-inventory databases for the stated reference year. Data quality is assessed for technological, geographical and temporal representativeness.

**Verification.** The PCF is independently verified to **ISO 14064-3**, by verifiers meeting the competence requirements of **ISO 14066**; preparation and verification are performed by separate parties to ensure impartiality. Two routes are available: (a) *verification* of a client-prepared calculation, and (b) *report & verification*, where the programme prepares the LCA and, by separated teams, verifies it.

**Outputs.** A carbon footprint report (the full study) and a verification certificate, published with a QR-verifiable entry in the public register; validity is five years, subject to monitoring and re-verification on any significant change. A PCF may subsequently be extended to a full EPD using the same life-cycle model.

## 6. Use of EPD software

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Producers may use advanced IT tools to create EPDs, automating preparation and verification — particularly helpful for broad product ranges and associations. Such software is developed by LCA specialists and technical advisers and offers functions that users cannot modify. The **software owner** commissions its development (a producer or association); the **tool operator** uses it to generate EPDs. Software types: **LCA software** (partial manual data entry, calculating EPD indicators) and **EPD software** (fully automated EPD generation combining company product data with LCA data). EPDs generated automatically are subject to random checks; EPD-generation software must be approved by the programme operator.

## 7. Software validation

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Validation of EPD-generation software follows several stages: **(1) tool approval** — analysis and assessment by accredited verification bodies of technical and methodological requirements; **(2) functionality testing** — confirming correct calculation of environmental indicators per LCA standards and that users cannot modify calculation/assessment functions; **(3) pilot EPD verification** — a pilot EPD is generated and assessed for conformity with EPD protocols, including how the tool integrates product-specific data; **(4) random EPD checks** — after approval, automatically generated EPDs are randomly checked by the verification body; **(5) updates & maintenance** — any tool updates must be re-approved by EPD Polska, and the operator must keep the tool compliant and report changes.

## 8. Verification & stakeholder engagement

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The programme provides third-party verification in accordance with ISO 14025, for a defined fee. EPD verifier independence is guaranteed by selecting experts not involved in the LCI/LCA. LCI data quality is verified by a FPC (factory production control) or ISO auditor, and the whole EPD process is part of a quality-management system supervised by the Technical Forum and the Impartiality Committee. The programme structure includes a Technical Council and an Impartiality Council ensuring stakeholder engagement.

The programme is open to all products within its scope and treats all clients equally. Services are delivered within Multicert's quality-management system (PN-EN ISO 9001, PN-ISO/IEC 27001). Multicert additionally holds PCA accreditation to PN-EN ISO/IEC 17065 for construction-product certification — a separate scope from this voluntary EPD programme. ISO 14025 third-party verification compliance includes: guaranteed verifier independence; LCI data-quality verification via on-site production audit or documentation; a conflict-of-interest resolution procedure; inclusion of the EPD process in the QMS under the Impartiality Council; external verification for a fee; openness to all in-scope construction, electronic and industrial products; equal client treatment. For business-to-business declarations, third-party verification is optional; for business-to-consumer declarations it is required.

## 9. Product category definition (PCR)

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Multicert develops Product Category Rules (PCR) using an integrated procedure covering a broad range of products — from construction materials, through electrical and electronic equipment, to other categories. Two key elements: **General PCR EPD Polska**, based on standards such as EN 15804+A2:2019, ISO 21930:2017, EN ISO 14067:2018 and EN 50693:2019; and **specific PCR**, developed for particular product categories. Multicert is open to accepting PCR developed by CEN Technical Committees or other bodies, subject to verification and approval. The EPD issuer is always ultimately responsible for the accuracy and credibility of the declaration. Where a PCR or reference standard provides precise guidance (c-PCR), conformity may be confirmed by an official statement. Each verifier acting for Multicert has full authority to request any information necessary for accurate assessment.

### 9.1 PCR development & maintenance

1. **Defining PCR scope & objective** — by the Multicert expert team with producers and stakeholders, considering current regulation, technology and market.
2. **Developing PCR content** — per EN 15804+A2, EN 50693:2019 and EN ISO 14025, covering LCA methodology, allocation rules, environmental indicators and EPD format/content.
3. **Stakeholder consultation** — meetings and workshops where producers, experts and end users comment on the draft.
4. **Review & approval** — by the Multicert expert team and independent reviewers, checking conformity, completeness and consistency; approved PCR are formally adopted and published.
5. **Validity & updating** — each PCR is valid for a maximum of 5 years.
6. **Parameter selection** — standard parameters per product category; modifications require justification and approval by the relevant technical committee.

## 10. Programme management procedures

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### 10.1 Document & data retention

Multicert uses an advanced document-management system (DMS) ensuring secure storage and integrity of all EPD-programme documents and data. Documents are kept in secured premises protected from fire, water and unauthorised access; digital data is encrypted and regularly archived externally. Confidential client information is marked and accessible only to authorised persons, per data-protection and trade-secret law. Each document has a defined life cycle (creation, verification, approval, publication, archiving, deletion). Access is strictly controlled by individual permissions, with regular internal and external audits.

### 10.2 Confidentiality of client data

Multicert applies a detailed privacy policy defining what data is collected, how it is processed, stored and protected, and clients' rights. Technical safeguards include firewalls, intrusion detection/prevention and regular vulnerability scanning; data transmitted over the internet is SSL-encrypted. All staff undergo regular data-protection training. Every client signs a confidentiality agreement; incident-response procedures apply on any irregularity. Procedures are regularly reviewed and updated.

### 10.3 Process oversight & standards compliance

The Project Manager oversees the entire EPD creation, verification and publication process, ensuring all stages follow the established procedures and international standards. Multicert performs regular internal audits, provides ongoing staff training, cooperates with independent external experts, and regularly reviews and updates its procedures based on client feedback, audit findings and changes in international EPD standards. Any non-conformity is immediately reported to the Project Manager and corrective action is taken.

### 10.4 Complaints & appeals

Multicert recognises the importance of transparency and fairness in handling complaints and appeals. Clients, partners and stakeholders may submit complaints directly to Multicert via a dedicated form on the EPD Polska portal, concerning either the EPD process or the declaration content. Within 48 hours of receipt the complainant receives acknowledgement and an expected resolution date. Complaints are examined by an independent **Complaints & Appeals Committee** of EPD experts and construction-sector representatives. The complainant is kept informed and receives an official letter with the outcome and any corrective action (which may include declaration correction, additional team training or changes to internal procedures). If the complainant disagrees with the Committee's decision, they have the right to appeal to a higher body within Multicert for a final assessment.

## 11. Legal & financial status of Multicert

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Although Multicert Sp. z o.o. is a commercial organisation, it places great importance on full independence and objectivity in creating and verifying EPDs. Through strict procedures and ethical rules, Multicert is not financially tied to any producer in a way that could influence declaration results. Multicert is a company registered in Poland, operating under Polish law, generating revenue mainly from fees for EPD creation and verification services.

## 12. Periodic update of programme documents

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Programme documents (these General Programme Instructions, PCR, verifier-competence and impartiality requirements, checklists) are reviewed and updated periodically to keep them aligned with current normative references and best practice. Updates are recorded in the version history (§15).

## 13. Annexes

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- Annex 1 — Verifier competence requirements and impartiality.
- Annex 2 — Verification checklist (LCA / EPD).
- Annex 3 — Operator workflow diagram (§4.7).

## 14. Normative references

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- ISO 14025:2006 — Environmental labels and declarations — Type III environmental declarations.
- EN 15804+A2:2019+A1:2021 — Sustainability of construction works — Environmental product declarations — Core rules.
- ISO 14040 / ISO 14044 — Life-cycle assessment — principles, framework and requirements.
- EN ISO 14067:2018 — Greenhouse gases — Carbon footprint of products.
- EN 50693:2019 — PCR for electronic and electrical products and systems.
- ISO 21930:2017 — Core rules for environmental declarations of construction products and services.
- ISO 14064-3:2019 — Verification and validation of greenhouse gas assertions.
- ISO 14071:2024 — Critical review processes and reviewer competencies.
- ISO 14066:2011 — Greenhouse gases — Competence requirements for greenhouse-gas validation and verification teams.
- EN ISO/IEC 17024 — Conformity assessment — Requirements for bodies operating certification of persons.
- Quality framework: PN-EN ISO 9001, PN-ISO/IEC 27001, PN-EN ISO/IEC 17025, PN-EN ISO/IEC 17021.

## 15. Version history

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Version	Description
1.0	Base version (construction products only).
2.0	Transformation into a general programme; scope extended to further product categories. Issued 01.03.2024.
2.0 (EN)	English translation of v2.0 for international use.

## Approval & document control

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Role	Name / body	Date
Prepared by	Grzegorz Suwara — Programme Director	1 March 2025
Reviewed by	EPD Polska Technical Forum	1 March 2025
Approved by	Grzegorz Suwara — Programme Director	1 March 2025

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