Kiwa-Ecobility Experts

Program operator, including in cooperation
with the notified bodies of the Kiwa Group

Program EE 1201, R. 4.0 (18.12.2025)

General Programme Instructions

“Product Level”

The Program EE 1201, R. 4.0 (18.12.2025) comprises 36 pages including 2 appendices.

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Versions of this document

Version number	Date	Summary of changes
R.1	21.01.2022	
R.2	26.02.2025	Inclusion of ISO 17029 Adaption of wording PCR A becomes Programm Appendix B1
R.3	03.06.2025	Formal Corrections
R.4	18.12.2025	Restructuring of chapters Precision of processes, in particular validation/verification requirements depending on LCA/environmental information tool Information of program version and program history

Vision:

We play a leading role in transforming businesses towards a global sustainable future.

Kiwa GmbH, Ecobility Experts, 2025

Mission:

We are the Kiwa Sustainability Team in Berlin, a group of experienced professionals navigating our customers through a fast-changing business environment. As a trusted service provider, we deliver efficient solutions and guidance that help to achieve an outstanding sustainability performance.

Kiwa GmbH, Ecobility Experts, 2025

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Note:

ISO and EN standards are named in this document. For reasons of better readability, only the abbreviation (EN xxxxx, ISO xxxxx) is mentioned in the running text. For the German market, the national editions apply. The current issue levels are listed in appende A. In the case of new editions, the changes are checked by the Kiwa-Ecobility Experts and, if relevant, changes are made to the main document. Purely editorial changes to the standards do not lead to a change in the main document, but are only updated in appendex A. The published version applies.

For the other documents that apply, the output stock from appendex A applies.

List of abbreviations

Abbreviation	English
AGB	Terms and Conditions
AVS	Assessment and Verificationsystem
CPR	Construction Products Regulation
DAkkS	German Accreditation Body
DoPC	Declaration of performance and conformity
EEPS	Electrical products and systems
EPD	Environmental Product Declaration in accordance with EN 15804
EAD	European assessment document
EOTA	European Organisation for Technical Assessment
ETA	European Technical Approval
hEN	harmonized european standard
ITT	Initial type test
LCA	Life Cycle Assessment
Kiwa-EE	Kiwa-Ecobility Experts, program operator of the Kiwa Group in accordance with ISO 14025
NB	Notifed Body
PCR	Product Category Rules= specific product category rules and in accordance with EN 15804
PSR	Product Specific Rules= specific product category rules in accordance with EN 50693
PEFCR	Rules for the category “Ecological Footprint of Products” in the sense of the Product Environmental Footprint (PEF) according to the COMMISSION RECOMMENDATION (EU) 2021/2279 of 15 December 2021 on the application of the methodologies for calculating the environmental footprint to measure and disclose the environmental performance of products and organisations along their life cycle.
SVA	Advisory Board (Sachverständigenausschuss)
VV	Validator & Verifier

0 Nomenclature

0.1 Terms - Environmental Information

Environmental information	Environmental information can be statements/claims regarding greenhouse gas emissions at the organization, project level (e.g., see ISO 14064-1/-2), environmental footprints (e.g., see ISO 14067 for a product's carbon footprints, ISO 14046 for water footprints, and ISO 14044 for LCA information), or environmental reports (e.g., see ISO 14016) (see ISO 14065). In the present case, e.g. the environmental information: • Environmental information or environmental product declarations according to ISO 14025 (including the life cycle assessment dataset and the project report), • Validation reports on environmental sustainability according to CPR [2], • PEF studies [3].
Environmental information programme	This is a programme that specifies product sector-specific rules and procedures for the production of product-related environmental information. The regulations for reporting are also shown. The general programme instructions presented here are to be used in combination with the respective environmental information programme (= programme rules).
Validation report on the Environmental sustainability according to CPR [2]	The Validation Report the environmental sustainability includes the quantified environmental information according to CPR [2]. It is based on a life cycle assessment and essentially consists of a product description, the objective and scope of the life cycle assessment, life cycle assessment results and the associated evidence. Environmental sustainability is described by defined essential environmental characteristics in connection with the life cycle assessment of a construction product, in detail: a) Climate change – total b) Climate change – fossil fuels c) Climate change – biogenic d) Climate change – land use and land use change e) Ozone Depletion f) Acidification Potential g) Eutrophication aquatic freshwater h) Eutrophication aquatic marine i) Eutrophication terrestrial j) Photochemical Ozone k) Abiotic Depletion -minerals and metals l) Abiotic Depletion -fossil fuels m) Water use n) Particulate matter o) Ionising radiation, human health p) Ecotoxicity, freshwater q) Human toxicity, cancer r) Human toxicity, non-cancer s) Land-use related impacts For detailed implementation, it is expected that further related delegated acts of the European Commission will be integrated, including the introduction of environmental indicators. The validation report documents and evaluates the calculation of environmental sustainability in terms of the CPR [2] (Appendix IX, AVS 3+) by a body notified in this context in the future. In the future, this will be explicitly included in the Declaration of performance and conformity of the economic operator (see CPR [2]), the environmental characteristics are shown here. The environmental characteristics mentioned a) – s) are identical to the core environmental indicators and the additional indicators for environmental impacts according to EN 15804.

Life Cycle Assessment Dataset	A life cycle assessment dataset is a product-specific dataset that describes the assumptions and the modelling in digital form. Modelling includes, for example, the information about materials, energies, emissions, waste, and transportation associated with a product in the life cycle under consideration.

0.2 Terms - Personnel and Organization

Customer	A customer is a client who commissions Kiwa-Ecobility Experts within the framework of a contractual relationship (engagement) to receive environmental information in accordance with these general programme instructions. This can be the manufacturer of a product. As far as it makes sense, however, the term can be transferred to services, etc.
LCA-Practitioner	Person, who carry out life cycle assessments and provide the environmental information, the life cycle assessment data set or the project report (in draft).
VV	Short therm for Validator & Verifier. In general validation and verification is done by the same personal.
Validator	The validator confirms the environmental information by verifying the objective evidence against the requirements for a specific intended future use or application.
Verifier	The verifier confirms the environmental information by verifying the objective evidence against the requirements for a specific real use or application.
Evaluator	The evaluator takes over the environmental information documents provided, the validation/verification documentation (plan) and the associated objective evidence/co-applicable documents and subjects them to a summary and independent assessment.
Decision maker	The decision-maker confirms that the environmental information is essentially correct.
User	A user in this case is a person who uses a software tool to carry out a specific LCA and Environmental information activity as defined in these General Programme Instructions. This tool can be a computer program, a web application, or an app. The special rights of the users (e.g. LCA practitioners, validators, etc.) are tied to the roles.

0.3 Terms - Validation / Verification (product-related)

Category	Subgroup of a product sector A product category is products with similar features and functionalities. Within the framework of product category rules, uniform requirements are set for the calculation and evaluation methods and reporting, e.g. concrete, external thermal insulation composite systems.
Product sector	Higher-level area in which products are classified, e.g. construction products according to EN 15804 / ISO 21930, electronic and electrotechnical equipment according to EN 50693
Product Category Rules (short: PCR)	Product category rules are product group-specific rules and complement general programme instructions and associated programmes. They are intended to contribute to increased methodological harmonization, specification, relevance and reproducibility within a product category.
Product group	Subgroup of a product category – technologically or functionally similar products
Product	Any goods or service within the meaning of ISO 14044
Objective evidence	Objective evidence is data that confirms the existence or truth of environmental information. They can be provided by observation, measurement, testing or other means. In the context of an inspection, objective evidence usually consists of records, findings of fact, or other information that is relevant to the inspection criteria. They

	allow an inspector to verify the conformity of the statement on the basis of the documents alone.
Validation	Process for assessing the adequacy of the assumptions, constraints and procedures that support an environmental information of the outcome of future activities.
Verification	Process of assessing an environmental information against historical data and information to determine whether the declaration is substantially accurate and meets the criteria.
Validation / Verification Body (short: VV-body)	Body that carries out the process of validation/verification. e.g. as an organisational unit of the Kiwa-Ecobility Experts program.
Validation / Verification assessment	The validation/verification assessment confirms (process according to ISO/IEC 17029): a) that all environmental information validation/verification activities have been completed in accordance with the agreement and the program, b) that the evidence is sufficient and suitable to substantiate the decision, c) whether significant findings have been identified, clarified and documented.
Validation / Verification secision	The validation/verification decision confirms or does not confirm the environmental information in the sense of the validation/verification statement by the validation/verification body (process according to ISO/IEC 17029).
Validation / Verification statement	The validation/verification statement explains the results of the process of a validation / verification (validation/verification body). The statement is based on the validation / verification decision.

0.4 Definitions - notified body with involvement of environmental sustainability according to CPR [2]

Economic operators	"Economic operators" means manufacturers, agents, importers, distributors and fulfilment service providers or any other natural or legal person subject to the CPR in relation to the manufacture or reprocessing of products, including used products, or their making available on the market.
Harmonised technical specifications	The harmonized technical specifications are standards and technical rules developed at the European level to evaluate and describe the performance and conformity of construction products. The harmonised standards (hEN) and the European Assessment Documents (EEAS) are the two main types of these specifications (published in the Official Journal of the European Union). They define the methods for testing, calculating and evaluating the performance of construction products. Products evaluated according to these specifications can bear the CE mark, confirming their conformity with European regulations.
Declaration of Performance and Conformity (DoPC)	Declaration by the above-mentioned economic operator in which he assumes responsibility for the product in terms of performance and conformity. The declaration indicates the performance of the products, inter alia, on the essential characteristics of these products in accordance with the relevant harmonised European standards or European assessment documents. The statement refers to the validation report and the applicable system for ensuring constancy of performance and compliance (AVS).
Certification of constancy of performance and conformity	The certificate must be issued, restricted, suspended or withdrawn by the notified body, depending on the AVS determined, as follows: AVS1+, 1: Certification of the constancy of performance and conformity of the product AVS 2+: Certificate of conformity of the factory's own production control AVS 3: Certificate of constancy of performance and conformity of the product (ITT) The Environmental Sustainability Validation Report (AVS 3+) is not part of the certificate. The notified body decides on the issue, restriction, suspension or withdrawal of the certificate on a specific basis (= evaluation). The

	certificate is part of the economic operator's declaration of performance and conformity.
Assessment of constancy of performance and of conformity	The Constancy of performance and conformity assessment is a process that ensures that construction products comply with harmonised technical specifications or European assessment documents and provides reliable information on their performance. The basis is the certificate of constancy of performance and conformity.
Assessment and Review System (AVS)	The CPR [2] specifies in Appendix IX the assessment and verification systems that define the responsibilities for the economic operators/notified bodies on a product-by-product basis. AVS 3+ is explicitly defined for the performance characteristics for the ecological sustainability of a building product.

1 General

The general programme instructions form the basis for the program operator of the Kiwa-Ecobility Experts (Kiwa-EE for short) for the preparation of environmental information, such as environmental informations at the product level and validation reports on environmental sustainability in the sense of the CPR [2].

Quantitative information on the potential environmental impacts of a product's life cycle is becoming increasingly important. Reliable environmental information on products is crucial for environmental decisions of many economic operators and is essential for making sustainable decisions at the product level, assessing the environmental impact of products and shaping the transformation to a climate-neutral world.

The product level also includes goods and services.

The environmental information is based on a life cycle assessment. This is usually an examination of the environmental impact of a product over its entire life cycle – from production to disposal or recycling.

The environmental information can be classified as Type III according to ISO 14025.

The general programme instructions take into account the normative regulations but must be subordinate if further legal requirements apply to a specific product sector.

Kiwa-EE continues to produce environmental information at the organisational level. However, these are not part of these general programme instructions. They are organised separately at Kiwa-EE.

2 Scope

The general programme instructions define the generally applicable administrative and operational procedures of program operator for the production of environmental information at the product level, which are transparent to the outside world. These include the processes of validation/verification of environmental information based on ISO/IEC 17029 and, if necessary, the publication of this environmental information.

The general programme instructions cover the minimum requirements of the individual programmes included here, and in some cases the maximum requirements of the individual programmes are declared to be generally valid. The environmental information programmes are based on these general programme instructions.

The following environmental information programmes are available:

- Environmental information programme in accordance with EN 15804 / ISO 21930,
- Programme for environmental information according to EN 50693,
- Programme for Environmental information in accordance with COMMISSION RECOMMENDATION (EU) 2021/2279 of 15 December 2021 on the application of environmental footprint calculation methodologies for measuring and disclosing the environmental performance of products and organisations along their life cycle [3].

The scope of these general programme instructions or the programme for environmental information according to EN 15804 / ISO 21930 (see Appendix 2) is extended to the preparation of validation reports on environmental sustainability, i.e. the associated documentation and evaluation of the calculation in the sense of Appendix IX, AVS 3+ of the CPR [2].

The assumptions and the modelling as well as the reviews are carried out on a comparable basis as is customary for environmental informations according to EN 15804 / ISO 21930. In the present sense, the validation report is comparable in essential areas to an environmental information and the associated project report according to EN 15804. It differs essentially in the type of reporting.

The aim is to give the product manufacturer the opportunity to demonstrate the performance characteristics of environmental sustainability for the construction products in an independent, transparent and systematic way. Product manufacturers will in future be required to include the validation report and the certificate of performance stability and conformity in their declaration of performance and conformity.

For this purpose, the Kiwa Group uses a system of notified bodies. The competence to prepare validation reports on environmental sustainability will be integrated into the program operator (= Kiwa-EE). In a period until the CPR [2] is fully implemented, Kiwa will create a transitional system here.

All individual programmes refer to these general programme instructions.

The list of applicable documents (Appendix A) and environmental information programmes (Appendix B) will be updated. This does not involve an automatic revision of the general programme instructions (main document).

Specific provisions for the programmes are:

- For the application, the general programme instructions and the respective applicable programme are to be used as complete requirements.
- The general programme instructions and the environmental information programmes are regularly reviewed for updates in order to adapt the implementation of the programme to current developments in the field of standardisation, life cycle assessment methodology, etc. In the event of relevant changes in the standards on which the environmental information programmes are based, an assessment is made with regard to the need for content or editorial adjustments in the programmes. The revision of the programmes will be published.

The provisions of these general programme instructions apply in principle to all programmes, unless special cases and deviations are expressly specified.

The basic calculation rules are based on ISO 14040 and ISO 14044.

Environmental information is produced by Kiwa-EE in various sectors.

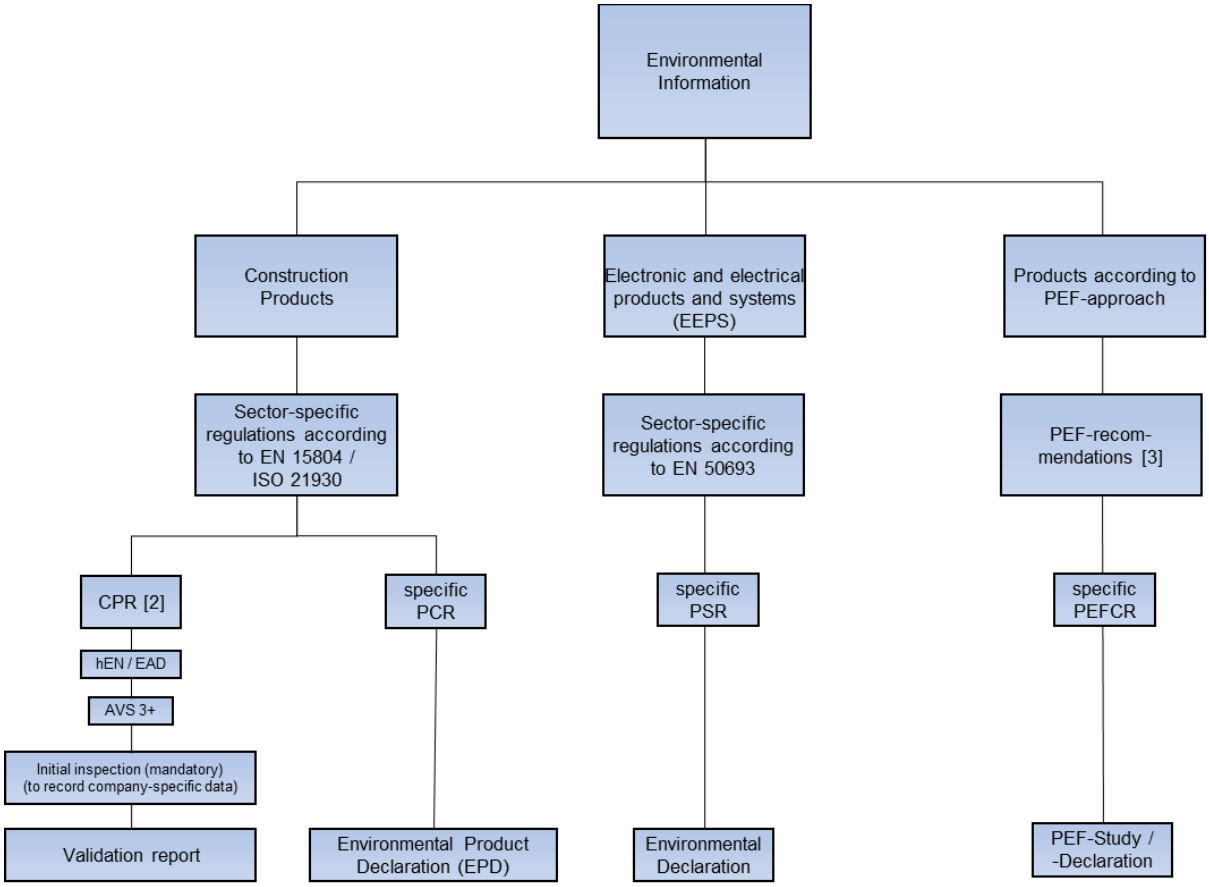

Illustration 1 Schematic representation of the Product sector-specific environmental information (Kiwa-EE)

3 Program Operator (Kiwa-EE)

3.1 General

The financial and human resources for the operator to produce environmental information at product level are provided by the Kiwa Group. Kiwa-EE is part of the Kiwa Group, a world-leading specialist in the areas of quality testing, monitoring, product and system certification, training and environmental protection services.

The Kiwa Group operates in various market segments, from construction and energy supply to drinking water, healthcare, food, feed and agriculture, and consumer goods. With 12,000 employees, Kiwa is a strong international partner in over 40 countries. The aim is to holistically combine product and system certifications with sustainability aspects for the customer. This also includes the circular economy / reuse of products with sustainable and economical use of materials and energy.

Kiwa-EE in Berlin serves as the program operator for the validation / verification and publication of environmental information, e.g. environmental informations according to Type III of ISO 14025, in the Kiwa Group.

Kiwa-EE cooperates with the ISO/IEC 17065 accredited certification body of the Kiwa Group.

3.2 Objectives of the program operator

The main objective of the program operator is to provide companies (including product manufacturers) as well as associations and organisations with the transmission of uniform environmental information on a harmonised, scientific basis throughout Europe. This environmental information goes through a set validation/verification process.

The program is open to all companies, associations and organisations on a non-discriminatory basis.

The validated/verified environmental information can be intended for communication between the above-mentioned stakeholders as well as between stakeholders and consumers.

3.3 Task of program operator

Kiwa-EE acts as a program operator and manages all administrative and organizational tasks that are the responsibility of an ISO 14025 environmental information programme.

This includes the processes of validation/verification based on ISO/IEC 17029 and, if necessary, the publication of environmental information in the program operator.

These tasks are listed below:

- Provision and publication of the general programme instructions,
- Defining the program procedures and adapting the program procedures to current developments in standardisation, life cycle assessment methodology, etc.,
- Ensuring that the requirements for the Type III Environmental information are complied with,
- Establishment and involvement of interested parties (LCA Expert Panel),
- Providing and maintaining a process that ensures data consistency within the program,
- Organisation of the Advisory Board (SVA),
- Competence and independence monitoring of the pool of validation and verification personnel,
- Organization of a transparent procedure for the creation of specific product category rules,
- Development of procedures to prevent the misuse of Type III environmental informations,
- Publication of environmental informations in relevant databases,
- Follow-up of changes after the issue of the environmental informations, adaptation if necessary,
- Cooperation with the notified bodies of the Kiwa Group for the preparation of validation reports on environmental sustainability according to CPR [2],
- Cooperation with the Technical Assessment Body of the Kiwa Group for implementation environmental sustainability in the EADs according to CPR [2].

4 Organisation of Kiwa-EE

4.1 Staff (general)

The entire staff of Kiwa-EE is contractually bound.

In principle, personnel are employed who meet the competence requirements for the specific processes. For this purpose, Kiwa-EE also has a pool of highly qualified validation/verification personnel and personnel who can perform the tasks of operational control over the entire process.

To qualify, the competency requirements for the relevant tasks must be met, such as professional experience with the product sectors, the relevant industry and the associated specifications. The employees at Kiwa-EE go through an appointment procedure including an annual examination by the SVA. The fulfilment of the competence requirements is subject to a monitoring process.

Kiwa-EE maintains a validation/verification body designed for specific sectors.

The Kiwa Group draws on broad expertise in the field of testing, monitoring and certification activities at the respective product level. The broad technical expertise of the staff can also be included in the validation / verification activities (e.g. in the sense of process understanding, product-specific laboratory analysis of the reference service life, etc.).

The staff and management of Kiwa-EE are committed to upholding the principles of confidentiality and ensuring impartiality. Not only the management staff of Kiwa-EE and the other service areas, but also the employees themselves, are subject to regular training and review on the topics of anti-corruption, anti-bribery, etc.

Contracted external personnel are screened through a third-party due diligence process prior to signing the contract. It checks whether unethical behaviour, such as lack of independence or participation in bribery, is known. If incidents are documented, contract will not be signed. As a result, the business partners sign a declaration of conformity.

The validation/verification personnel appointed for the customer's specific projects are independent third parties whose qualifications are checked in advance by Kiwa-EE entities. Their appointment/recognition is valid and were not involved in the previous determination of the results or partial results of the specific product-related life cycle assessments.

4.2 LCA-Expert Panel

Specific LCA expert panel ensure the involvement of interested parties.

Depending on the issue, Kiwa-EE actively calls for membership in specific LCA expert committees. The Kiwa-EE website indicates how interested parties can register and add themselves on a program newsletter.

The LCA Expert Panel will be involved in the further development of the programs by:

- contribute their expertise to the development of product category rules,
- inform interested organisations about the environmental information programmes or about the creation of specific product rules, and
- Provide feedback on ongoing program activities.

The LCA expert panel thus contribute to the continuous improvement of the programs.

Depending on the question, Kiwa-EE will put together an LCA expert committee for the development of the necessary product category rules. The entire product category-related expert knowledge is to be included here. The LCA expert panel usually includes representatives from industry, planners, academics, institutions as well as representatives of consumer and environmental interests. Participation is open to all interested parties.

4.3 Advisory Board (SVA, German: Sachverständigenausschuss)

The Advisory Board has the task of monitoring the guarantee of impartiality and neutrality in the implementation of the program work.

The following tasks are carried out by the SVA of Kiwa-EE:

- general advice to program operator,
- the examination and approval of the respective program bases and verification of conformity and the associated rules,
- technical supervision of the use of environmental information programmes for type III environmental information in accordance with ISO 14025,
- the review and approval of the development and review procedures for the methodological and editorial product category rules applied by Kiwa-EE,
- checking the quality of environmental information and related documents,
- the annual review of validation/verification personnel based on competence monitoring,
- exchanging information with Kiwa-EE on the latest findings, research and activities in the field of sustainability to ensure that the programmes are always up to date,
- Decisions and resolution of disputes regarding non-compliance with programme rules,
- Handling of complaints in case of appeals.

The SVA works independently and sets out its tasks, organisation and working methods in its rules of procedure. The Head of the Program Operator shall ensure that the qualifications of each SVA member meet the minimum requirements of ISO 14025, chapter 8.2.2.

4.4 Validation / Verification Body (VV-body)

The validation/verification body organises the validation/verification process and issues the validation/verification statement for an environmental information based on all necessary objective evidence.

The Validation / Verification Body / Program Operator also develops and publishes any necessary product category rules in cooperation with a specific LCA expert panel.

The environmental information owner is liable for the underlying information and evidence. The program operator is not liable for customer data, life cycle assessment data and objective evidence.

4.5 Technical Assessment Body – Kiwa (TAB)

The Kiwa Group has a TAB according to CPR [1] [2] and is a direct member of EOTA. EOTA is an organisation responsible for coordinating the European Technical Assessment (ETA) process, providing a means to CE marking for non-standard construction products. The evaluations are based on tests, investigations and technical reports. The Kiwa Group accompanies these processes and also has a wide range of experience, including in the tests that may be required, in the various product categories.

In this context, Kiwa undertakes to integrate ecological sustainability with the defined environmental characteristics of a product into the European Assessment Documents (EAD) or ETAs. For this purpose, a procedure by the CPR [1] [2] considered.

In addition, after a thorough examination, the TAB issues "TAB-expert opinions" within the meaning of the Muster-Verwaltungsvorschrift Technische Baubestimmungen, Teil D 3 [7] and thus building a bridge to the compliance of national building requirements in Germany for specific products.

4.6 Notified bodies of Kiwa or the Kiwa Group (NB)

The Kiwa Group has over 20 notified bodies worldwide and thus conformity assessment bodies. These can be viewed via https://webgate.ec.europa.eu/single-market-compliance-space/#/notified-bodies, among other places.

In Germany, according to the CPR [1], six Kiwa bodies have issued a product-related notification. The notifications are stored at the sites or via a multi-site approach through the necessary accreditations according to ISO/IEC 17025 (tests), ISO/IEC 17020 (inspections) . ISO/IEC 17065 (certifications) and follow the established assessment and verification procedure of the above-mentioned CPR and the harmonized product specifications that are also applicable.

In the future, the conformity assessment bodies will have an expanded field of responsibility. Among other things, the ecological sustainability performance of products is also included in various product sectors. In this sense, Kiwa-EE acts as Kiwa's program operator and becomes the sole NB. It will be implemented in the near future with the introduction of CPR [2], the notification will be extended for the Kiwa Group.

5 General principles

5.1 Principles to the Validation / Verification Body

5.1.1 Competence

Kiwa-EE personnel have the necessary knowledge, skills, experience, training, supporting infrastructure and capacities to effectively carry out the validation/verification activities.

Competence requirements are defined for the various activities, which are used both for the recruitment of new personnel and for the further development of employees for certain activities. The maintenance of competence is continuously monitored.

5.1.2 Responsibility

Kiwa-EE fully assumes its responsibility with regard to its activities.

The Validation / Verification Authority shall be responsible for ensuring that its validation/verification statement is based on sufficient and appropriate objective evidence. The management and employees of Kiwa-EE are aware of their responsibility to carry out their activities as a validation / verification body conscientiously and on the basis of evidence.

Kiwa-EE uses methodologies that leads to reliable and verifiable conclusions of validation/verification and which are based on sufficient and appropriate objective evidence.

The validation/verification process is documented by the validator / verifier. For the program, this creates the basis for the conclusion and decision regarding the conformity of the claim with the established requirements.

Activities, findings, conclusions and statements in the context of a validation / verification are truthfully and carefully documented. This includes significant obstacles during the process, as well as unresolved differences between the validator / verification body and the customer.

5.1.3 Impartiality

Kiwa-EE ensures impartiality within the meaning of ISO/IEC 17029, chapter 4.3.1.

All work is carried out impartially. All employees worldwide are committed to acting with integrity and impartiality in accordance with the Kiwa Group's Code of Conduct and Compliance. The management staff of Kiwa-EE and the other service areas, but also the employees themselves, are subject to regular training and review on topics such as anti-corruption, anti-bribery, etc.

For this purpose, monitoring is carried out by the Kiwa Group.

A special program of the Kiwa Group enables all employees to point out grievances, dangers, bribery or inappropriate handling, anonymously if desired. The staff and management of Kiwa-EE commit themselves to complying with the principles by signing the confidentiality and impartiality declaration. In order to avoid conflicts of interest with regard to impartiality, the work order requires external (contractually bound) personnel to confirm this on the specific assignment.

5.1.4 Openness

Kiwa-EE publishes necessary information on the procedures of the validation/verification process on its website. General programme information is provided on the website The databases can also be accessed via the website.

The email address “DE.Ecobility.Experts@kiwa.com” can also be used for direct contact.

5.1.5 Risk-based approach

Overall, Kiwa-EE follows the risk-based approach. All employees make every effort to record and evaluate risks from the various process steps and from the entire context of the activity as a validation/verification body in order to ensure that processing is as consistent and impartial as possible. This includes all processing phases, all communication with customers and interested parties, and consideration of the legal and regulatory environment.

All Kiwa-EE employees are explicitly requested to identify and name the potential for improvement in the process flows. A risk analysis is planned.

5.1.6 Confidential handling of information

The project reports on the environmental informations and the validation reports according to CPR [2] often contain in-house, company-secret and non-publicly accessible investment data. This information is confidential and will only be made available to selected validators/verification personnel who have contractually agreed to confidentiality for the purpose of verifying the environmental information. In certain cases, this data may also be submitted to the SVA for examination upon request, whereby its members are also obliged to maintain confidentiality.

In addition, reference is made to the general data protection rules of the Kiwa Group, including the website:

https://www.kiwa.com/de/en/privacy-statement/

In addition, Kiwa-EE must ensure that third party audits, e.g. by DAkkS or representatives of the ECO PLATFORM, are guaranteed access to specific documentation or access to customers.

5.1.7 Professional scepticism

Kiwa-EE work with care and the evidence. Already in the project map, the possible risks due to false (in the worst case fraudulent) information, materiality and planning to collect the evidence is taken into account. The validity and authenticity of the evidence is questioned, if there is any doubt about the reliability of information and documents, the customer is informed and clarification is requested (e.g. by inspecting original documents or direct on-site inspection by the team).

5.1.8 Openness to complaints / arbitration procedures

The parties interested in validation/verification have the opportunity to file complaints. These complaints are treated and resolved appropriately. Openness to complaints is necessary to demonstrate integrity and credibility to all users of validation/verification results.

Kiwa-EE or Kiwa operates a complaints procedure for all conformity assessment activities.

In the event of complaints that cannot be resolved between Kiwa-EE and the client, the client or the chairman of the SVA may initiate mediation proceedings in accordance with the mediation rules of the *German Institution of Arbitration e.V.* (DIS), the implementation of which must be agreed by the parties. In this procedure, the parties involved try to resolve all problems amicably. If it is not possible to resolve the differences amicably within 60 days of the request for the initiation of a conciliation procedure, they may take legal actions. The same applies if negotiations are not started within 30 days of receipt of the application.

5.2 Principles for the validation/verification process

5.2.1 General

The validation/verification process is based on ISO/IEC 17029 and follows the evidence-based approach to decision-making, documenting all relevant data and bases, and ensuring a truthful and careful reflection of all findings, conclusions and statements about a life cycle assessment. The process of calculating a life cycle assessment consists of the 4 phases:

- Defining the objective and scope of the study,
- Life Cycle Assessment,
- Impact assessment,
- Interpretation of the results,

in accordance with ISO 14040 / 14044.

Kiwa-EE works according to the following principles:

- **Prioritization of the scientific approach**:
  Scientific findings from e.g. physics, chemistry, biology or approaches from international conventions should preferably be used in the decision-making process.

- **Completeness**:
  All relevant environmental impacts must be taken into account, including raw material extraction, production, use and disposal.
- **Accuracy**:
  The data should be as accurate as possible to achieve reliable results. This requires careful data collection and validation/verification.
- **Transparency**:
  The sources of the data are clearly documented to ensure traceability/trust.
- **Consistency**:
  The data is based on internationally recognised methods (comparability, see chapter 5.2.4).
- **Coherence**:
  The methods, standards and guidance documents that are already internationally recognised and adopted for such product categories are applied.
- **Relevance**:
  The data must be specific to the product under study and reflect the actual life cycle
- **Conservativeness**:
  When evaluating comparable alternatives,
  the cautiously moderate alternative is preferred.

The quality of the data influences the reliability of environmental information.

5.2.2 Types of environmental information

The environmental information must clearly indicate the type of environmental information involved.

The following table contains a detailed description of the different types (= classification) for the preparation of environmental information, such as EPDs.

Table 1 Classification of types of environmental information (product/manufacturing plant-related) based on EN 15941

Specific product	Environmental information on a specific product, e.g. from a single manufacturing plant (1 product, 1 manufacturing plant)	e.g. for a specific concrete mixture produced in a single ready-mix concrete plant of a manufacturer
	Environmental information of a specific product as an average of e.g. several manufacturing plants of the product manufacturer (1 product, > 1 manufacturing plant)	e.g. for a specific concrete mixture produced in several (or all) plants of a manufacturer This can include different locations of a company with the same manufacturing processes.
Average product	Environmental information of an average product from e.g. one manufacturing plant (average product, 1 manufacturing plant)	e.g. the average concrete (or a group of concretes) produced in a single ready-mix concrete plant of a manufacturer.
	Environmental information of an average product from e.g. average of several plants of the product manufacturer. (average product, > 1 manufacturing plant)	e.g. for average concrete mix (or a group of concretes) produced in several (or all) plants of a manufacturer. This can include different locations with different manufacturing processes.
Representative product	Environmental information on the impact of a representative product (not an average product) to represent the impact of a product group from a plant of the product manufacturer. (representative product, 1 manufacturing unit)	A (typical) product can be selected that is representative of a specific product group and declare the environmental impacts for that product to be representative of the entire product group. The choice of the representative product must be justified.
	Environmental information of the impact of a representative product (not an average product) to represent the impact of a product group from several plants of the product manufacturer. (representative product, > 1 manufacturing unit)	A (typical) product can be selected that is representative of a specific product group and declare the environmental impacts for that product to be representative of the entire product group (representative environmental information). The choice of the representative product must be justified.

When classifying a specific product / average product / representative product, the worst-case approach is still possible. This takes into account the applicable data that lead to the highest environmental impact.

For the purposes of the validation report documenting and evaluating the environmental sustainability calculation in accordance with Appendix IX [2] (AVS 3+) by Kiwa-EE, a worst-case approach must be used in relation to the information module, which uses the environmental indicators (environmental characteristics) with the highest environmental impacts of all input data to be modelled, e.g. raw material supply, transport and production. The worst-case approach thus covers the worst-case scenario for the product.

5.2.3 Quality

The data is categorized as follows:

- **Company-specific data** (also referred to as "primary data"):

  This is data that is collected in the manufacturing plant. These include process-specific information as well as actual data from different phases of the life cycle. This includes site-specific information on product manufacturing, power generation by contracted suppliers and transport data such as distances, means of transport, capacity utilisation and fuel consumption of the contracted transport companies.

- **generic data** (also referred to as "secondary data"):

  These are selected generic data, e.g. commercial databases and free databases) that meet the prescribed data quality criteria for accuracy, completeness and representativeness.

In principle, specific data for a specific product or process should be used to prepare a life cycle assessment. If such specific data is not available, information from other sources, such as generic data.

Generic data can then serve as a substitute for specific data. However, generic data should never replace specific data when the latter are available. It is important to use the best possible information to create an accurate and meaningful life cycle assessment.

The generic data shall be indicated by stating the the background database and the reference year of the database. Data quality information must include at least the following elements:

- time-related coverage,
- geographical coverage,
- Technology coverage.

5.2.4 Comparability

Kiwa-EE ensures the comparability of environmental information in accordance with ISO 14025 and the other specifications of the individual programs. In particular, the following aspects must be taken into account for the assessment of comparability: product category rules used, functional or declared unit, geographical reference, definition of the system boundary, declared modules, data selection (primary or secondary data, background database, data quality), scenarios used for the use and disposal phases and the life cycle assessment (data collection, calculation methods, allocations, general requirements for validation/verification process).

6 Approval of individual validators/verifiers

6.1 Purpose

This procedure defines the process for assessing, approving, and maintaining the competence of individual Validators/Verifiers (VV) within Kiwa-EE.

It ensures that all appointed validators/verifiers possess the education, experience, and independence necessary to perform validation/verification activities in accordance with the applicable internal programme instructions and the requirements of the Kiwa-EE Quality Management System (QMS).

6.2 Approval Process

Approval as a Validators/Verifiers follows a three-level qualification pathway, ensuring that competence, experience, and technical understanding are demonstrated and documented at each stage.

6.2.1 Level 1 – Formal Qualification and Induction

a) Applicants shall submit:
   - A CV using the Kiwa-EE template, documenting education, relevant experience, and sector knowledge
   - An application form specifying total years of professional experience in LCA, validation/verification, and auditing.

b) The program operator evaluates the documents against the competence criteria defined in an evaluation matrix.

c) If any criteria are partially unmet, the program operator prepares an induction plan to address identified gaps before progression.

d) At this level, the applicant shall demonstrate understanding of:
   - Kiwa-EE QMS regulations and programme instructions,
   - Rules and procedures for validation/verification at both product and organizational levels,
   - Relevant standards, PCRs, and guidance applicable to the candidate's intended sector,
   - Product- and sector-specific knowledge developed through internal or self-study.

e) Applicants with extensive auditing or LCA experience may be partially exempted from the induction requirements at the discretion of the Program Operator.

6.2.2 Level 2 – Support and training phase

a) If an applicant does not reach the threshold of the evaluation matrix following Level 1, they may enter an support and training phase (= shadowing programme) under the guidance of an experienced VV (mentor).

b) The shadowing programme shall include:
   - Observation of full validation/verification activities, including planning, review, and dialogue between LCA-practitioner and validator/verifier,
   - Guided participation in defined steps of the validation/verification process,
   - Documented feedback from the mentor covering technical performance, communication, and adherence to Kiwa-EE procedures.

c) All training documentation and feedback must be archived in the candidate's training record. This is done for at least 2 project cases.

d) A consolidated training report shall be reviewed by the Program Operator, who may adjust subsequent training requirements based on performance results.

6.2.3 Level 3 – Witness Audit and Qualification

a) After successful completion of Level 1 (and Level 2 if applicable), the applicant shall undergo a witness audit.

b) The applicant performs an independent validation/verification while being observed by a qualified Validators/Verifiers. The supervising Validators/Verifiers prepares a witness audit report evaluating technical competence, conformity with procedures and professional conduct.

c) If the result is positive, the program operator will:

- issues sector-specific approval,
- and enter the validator/verifier in the official Kiwa EE register.

d) For any extension of scope, a new or shortened induction, and if necessary an additional witness audit, shall be completed depending on sector similarity.

6.3 Maintaining Competence

a) Approved Validators/Verifiers must maintain professional competence through continuous professional development and regular participation in validation/verification activities.

b) Each Validators/Verifiers shall annually:

- perform at least one validation/verification within Kiwa-EE or a recognized Type III programme, or
- conduct one LCA contributing to an environmental information, or
- Moderate or review one Product Category Rule (PCR).

c) Validators/Verifiers shall:

- participate in Kiwa-EE or related validator/verifier meetings (or review the recordings),
- submit annual evidence of activity and competence to the Program Operator,
- maintain up-to-date contact and availability information.

d) Inactive Validators/Verifiers will be removed from the active registry until re-evaluation and re-approval are completed.

7 Process of Validation / Verification

The process is the basis for all environmental information programmes that Kiwa-EE operates.

7.1 Pre-engagement

A prerequisite for the activities of the validation/verification body is a targeted analysis of the relevant known facts regarding organizational and/or operational data of the customer or manufacturer, external requirements in the industry and specific goals of the manufacturer is required in advance. This phase (preliminary engagement or inquiry/application review) also serves to carry out the preliminary check and to determine the scope of the study.

After a preliminary check (technical and formal), the offer can then be formulated and sent to the customer. The commissioning of the service must relate to the offer (offer number/date). For extensions that only arise after the start of the project, the same procedure will be followed, a supplementary offer will be prepared. The terms and conditions of Kiwa GmbH apply.

For the professional preparation of the offer, all information on the customer name, the manufacturing plant, objectives and the scope of application must be available or made available on request. To do this, the customer creates an application, for which he can request an application form or from the Kiwa download area.

7.2 Engagement

The process step of engagement requires the commissioning of the service, according to the offer prepared by Kiwa -EE. If the basics, goals and performance parameters have changed in the meantime, the offer must be adapted and ultimately commissioned in writing by the customer.

The services commissioned by the customer are then transferred to the planning process.

7.3 Planning

The services commissioned by the customer are planned according to the scope decided during the engagement phase.

For this purpose, a strategic analysis and a risk analysis must be carried out by the VV-body. On the basis of this, a plan for recording evidence must be created. Furthermore, it may be necessary to plan on-site audits. As a result of the planning steps, the customer receives a validation / verification plan (project map) with the essential information.

If changes are necessary during the execution, the customer must be informed with the reasons. The revisions to the planning must be documented in the project map.

Provided that no deviations or increased risks are identified in the results of the analyses, the VV-body selects a validator/verifier suitable for the project in the next step. Lastly, the assigned verifier/validator must sign the project plan and confirm that they are independent for the assigned project and that they are not aware of any conflicts of interest.

Note: Environmental product declarations that are to be published as ECO EPDs within the framework of the ECO PLATFORM do not have to undergo the planning process of strategic analysis, risk assessment and on-site audits.

7.4 Execution – Validation / Verification

Only the environmental information that comply with the Kiwa-EE program rules (General Programme Instructions, Specific Product Category Rules) will be validated / verified.

The further regulations on the assumptions and modelling in the harmonised technical specifications, such as the harmonised standards and the European assessment documents, are to be prioritised.

The course of the process is updated in the project map agreed with the customer. Communication to clarify open questions between LCA practitioners and validators/verifiers is conducted transparently and iteratively.

7.4.1 Submission of data

The Data provision includes the essential activities for performing the analyses and modelling required for life cycle assessment. The environmental information is first compiled in draft form. In addition, the life cycle assessment data set and the project report are presented as drafts.

The project report contains the information based on the LCA and, if necessary, additional information provided to meet the requirements of the relevant specifications.

The result is a draft statement on specific environmental information.

The documents and data to be verified must be sent by the LCA practitioner directly to the assigned verifier.

The method of data transfer depends on whether the tool used is integrative and whether it allows the verifier access. An overview of these tools can be found in chapter 6.2. In practice, different tools are used to generate environmental information. The characteristics of the tools influence how the validation and verification process shall be carried out.

In practice, there are three common tool approaches:

1. Environmental information generated with a LCA tool,
2. Environmental information generated with environmental information tool,
3. Environmental information generated with fully integrated tool.

Table 1: Overview of LCA and Environmental information tools (using the example of the EPD)

	Individual LCA tool	Individual environmental information tool	Fully integrated environmental information tool
Product specific (PCR)	no	no	yes
Programm operator (specific)	no	yes	yes
Input data quality	Quality of input data is not intrinsically ensured.	Quality of input data is not intrinsically ensured.	Quality of input data is intrinsically ensured.
Output	Results of LCA, individual generation of EPD & project report	Full EPD document results & project report, data set in ILCD+EPD format	automatically generated full EPD document (on demand) results & project report, data set in ILCD+EPD format
Tool verification (validity period: max 5 years)	General Tool verification by third party	In addition to General tool verification by third party: • log function for data and report generation • Data Integrity Checks	In addition to General tool verification by third party: • recording all changes (e.g., new data, formula modifications, background data updates, expansion to PCRs, output format changes). • Include date of modification and version numbering • log function for data and report generation • Data Integrity Checks
Validation / Verification on individual environmental information	1. Input data, consistency of input and output 2. Format and content of EPD document	1. Input data, consistency of input and output	1. First EPD: Input data, consistency of input and output 2. Further EPD: no further detailed check, but sample check of input data, consistency of input und output data

In all cases, when checking environmental information, it is required that the tool verification for the tool to be used is in accordance with the ECO PLATFORM guidelines [4]. The validation/verification body decides on the recognition of the tool based on tool verification reports. Furthermore, interfaces can be established with the operator of environmental information tools, which allows:

- allow validators/verifiers to access the tool to check specific calculations,
- enable validated/verified environmental information (e.g. EPDs) to be sent directly to Kiwa-EE as digital datasets for further processing and publication.

Details of the verification processes for the above cases are presented in chapter 7.4.2.

Special case: Environmental sustainability according to CPR [2]

The notified body must, as part of its activities in the AVS 3+ of the CPR [2] carry out an initial inspection of the product manufacturer or the specific manufacturing plant in order to collect company-specific data. A checklist is used for this purpose.

If necessary, the inspection is carried out as part of the activities of AVS 1, 1+ (certification of constancy of performance and conformity of the product) or AVS 2+ (certificate of conformity of factory production control).

Objective evidence is collected in the manufacturing plant, e.g. for the following parameters:

- logistics,
- type of packaging,

- suppliers (e.g. logistics chain),
- BOM / Component BOM,
- energy mix, which is used, for example, for production processes,
- technological changes in manufacturing processes.

In accordance with the responsibility for the declaration of performance and conformity, the product manufacturer is obliged to notify Kiwa-EE about critical changes that deviate from the declared environmental impacts. In the event of modifications to the product that result in a deterioration in performance environmental sustainability the validation report must be limited (see chapter 8.1.5), to suspend or withdraw.

Kiwa-EE must or can arrange for a new initial inspection of the manufacturing plant to verify the changed company-specific data.

In general, pragmatic ways should be found to provide the objective evidence in the sense of the validation/verification between the manufacturer and Kiwa-EE in the event of changes to the company-specific data.

Validation Report

The process includes the essential activities to verify the product manufacturer's required analysis and modeling. There will be a validation report in draft. This validation report also includes the LCA-based information and any additional information provided to meet the requirements of the relevant hENs/EADs.

7.4.2 Validation / verification procedures

7.4.2.1 Procedures via LCA tool and environmental information tool with individual Validation/Verification

The LCA and environmental information Tool – Individual Validation/Verification are the standard procedure for validating/verifying environmental information applies to all environmental information that is not covered by the chapters 7.4.2.2 For performance and conformity assessments of environmental sustainability performance in the sense of a notified body, the further provisions according to chapter 7.4.2.4.

The procedure contains the following individual points to be documented:

- Data delivery,
- declaration information,
- Product Description, Scope of Application,
- System boundaries (modular structure),
- Energy (falls relevant),
- Criteria for the exclusion of inputs and outputs,
- Data collection, selection of background data,
- Verification of the validity of the data,
- Development of product-level scenarios in the life phases,
- allocation, information on life cycle modelling,
- Parameters of the life cycle assessment and impact assessment,
- Interpretation / Interpretation,
- General information is complete and in accordance with the project report,
- Conclusion of the data review.

It is explicitly pointed out that the content of the environmental information, the format and the presentation of the reporting meet the requirements of Kiwa-EE.

For the environmental information tool with individual verification, the LCA background report (project report) and environmental information are automatically generated by the tool.

An iterative validation / verification approach is used. This approach contributes to the consistency of the outcome documents. As a result, necessary analyses and calculations can be carried out and conformity to the requirements can be assessed, especially when considering the individual phases of the life cycle assessment.

When there is a large number of products to evaluate, not every piece of environmental information is considered individually. A simplified procedure can be used to apply the validation/verification requirements. In this case, Kiwa-EE uses the procedures via LCA-Tool / Environmental Information-Tool.

7.4.2.2 Procedures via Environmental Information Tool - Fully integrated Validation/Verification

The general programme instructions take into account the validation/verification procedures via environmental information tools. Changes to the general programme instructions or the specific product category rules must be adapted by the user within 6 months in the software tools. An update of the respective environmental information must be ensured by the user. For these tools, Annual check of the tool shall be performed; along with the sapling of environmental information.

In order to create environmental information via environmental information tools, the environmental information tool requires specific approval by Kiwa-EE. This is a tool with fixed calculation and evaluation methods that cannot be changed by the user. The result of the tool is the output of specific, automatically generated environmental information, e.g. a product-related environmental information / a validation report according to CPR [2]. A tool project report documents the tool identification including the tool release, the product category rules applied, the LCA model and the environmental information output documents.

The assumptions and the input data are made by the user of the tool. A tool approval also includes the 1st environmental information (= master data set). Significant tool changes will result in a renewed tool approval and an evaluation of the 1st master data set by Kiwa-EE, and after 5 years at the latest, a new tool approval by Kiwa-EE must take place.

Any further environmental information created using the results of the approved environmental information tool will be validated/verified via a shortened procedure. However, all points dealing with process modelling and the fixed content of the environmental information will be accepted on the basis of the approval of the tool and the first environmental information validation/verification. This means that as a rule, only the variable input data and respective results as well as the form of the environmental information are checked for plausibility.

7.4.2.3 Program for environmental information - Process Certification (Product Level, ISO 14025)

Environmental information on the program for process certification (Program EE 1202 [6]) serves as an alternative and is used in particular when the products / product groups and thus the specific product category rules are diverse and can only be implemented in standardized validation / verification processes with a high administrative effort. This procedure includes an initial assessment (process monitoring + random sample/product group) followed by regular inspections (process monitoring + random inspection/product group, under the requirements of the Kiwa-EE requirements). An annual evaluation of the process is carried out by Kiwa-EE.

This procedure is required for the Validation Report on environmental sustainability [2] currently excluded.

7.4.2.4 Performance and conformity assessment of environmental sustainability in the sense of a notified body

The procedures described in chapter 7.4.2.1 and 7.4.2.2 can be used to prepare product-related validation reports on the environmental sustainability of performance consistency and conformity in accordance with the CPR [2].

Environmental sustainability is part of a complete list of essential characteristics specified in the harmonized technical specification for the product for which the product manufacturer declares performance. Kiwa-EE systematically checks the input data relating to the products, assumptions, and modeling. This includes assessing the correct use of the relevant software. Company-specific data must be collected through inspections and, if necessary, verified (AVS 3+) in accordance with the CPR [2]).

7.5 Execution – Evaluation

Evaluation according to the agreed project map (Quality check)

The specifically qualified assessment staff of the VV-body commissioned in the project (not yet involved in the process - second person/four-eyes principle) takes over the documents and data provided and subjects them to a summary and independent evaluation and conduct a review referring to three objectives (Internally, this process is called a quality check):

1. Project registration (by Kiwa-EE)
2. Environmental information content check (by Kiwa-EE team or internal verifier)
    a) General formal check,
    b) Content check of sensitive LCA issues / common mistakes,
    c) Conformity assessment of the content with regard to the normative requirements.

All relevant records / evidence of the project will be made available for the evaluation.

Result of the evaluation:

The result of the evaluation must confirm that:

- all validation/verification activities have been completed in accordance with the agreement with the Client and the requirements of the Program,
- the evidence is sufficient and suitable for a decision,
- all key findings have been identified and documented, and all open questions about the project have been clarified with the relevant project managers.

All relevant records/evidence and the assessment will be provided for the validation/verification decision.

7.6 Execution – Decision

Issue of the validation/verification statement

The validation/verification decision to create the validation/verification statement is based on the assessment and is only made by an independent third party. Minimum information is mandatory for issue, in accordance with the environmental information programmes. This allows the environmental information to be issued.

The documentation is usually in English but can also be published in other languages at the customer's request. Translated versions may be published in addition to the English version, but the English version will prevail in the event of any discrepancies.

If an issue is not possible based on the assessment, the validation / verification will be cancelled, and the customer will be informed.

Note: For verifications of Scope environmental declarations according to ISO 14025 (eg. EPDs) the documentation of decision is not necessary. After a successful quality check, the environmental information can be registered and published immediately.

New facts after issue of the validation/verification statement

For various reasons, new facts / information (e.g. change of power mix) may become known after the statement has been issued. Then it is necessary to evaluate the relevance of the facts and their influence on the validity of the statement together with the customer. If these facts have a relevant influence on the statement, a revision of the statement, if necessary. with repetition of relevant process steps or withdrawal required.

7.7 Special case: Validation report on environmental sustainability according to CPR [2]

The CPR [2] takes similar approach for validation / verification. The basis for this is the data collection for input data, assumptions and modelling and the establishment of an in-house production control system of the product manufacturer.

Kiwa-EE issues the Validation Report on Environmental Sustainability, commenting in detail on the following points:

- verification of input data, underlying assumptions and compliance with applicable generic or product category-specific regulations,
- verification of the manufacturer's rating,
- verification of the procedure used to prepare this assessment,
- verification of the correct use of the appropriate software for the assessment.

For this special case, the regulations are applied as far as it makes sense.

8 Issue and publication of environmental information

8.1 Environmental information

8.1.1 Issue

The environmental information is issued by Kiwa-EE.

The layout of the environmental information reporting is specified by Kiwa-EE. In principle, the content is presented in a comprehensible manner, the environmental information or the project report meet the requirements of ISO 14025 or the requirements of the specific environmental information programmes. The environmental information do not contain any evaluative or comparative statements.

Each environmental information must include have the following contents:

- Information on the environmental information programme (logo, indication of the underlying product category rules, registration number, publication date, indication of validity, indication of the year of operation taken into account, geographical scope),
- Product-related information (clear description of the product, information on the manufacturer including address, indication of the manufacturing plant for which the declaration is representative, description of the application, technical description including indication of technical characteristics, indication of basic and auxiliary materials, declared or functional unit and, if applicable, the expected reference life of the product, brief explanation of the life cycle assessment data),
- Life cycle assessment calculation rules: description of the data, data quality, background data and designation of the applied performance rules,
- Submission of the impact assessment,
- Documentation of the life cycle analysis in the project report,
- Interpretation of the impact assessment,
- References,
- Description of the validation/verification procedure,
- if applicable, evidence or calculation aids for users (e.g. scaling the impact assessment),
- Notes on comparability.

The environmental information is released by the signature of the management staff of Kiwa-EE and the validation/verification body of Kiwa-EE. Validity is regulated by the environmental information programmes (see Appendix B).

Products which have similar characteristics and are manufactured in one or more factories subject to the same product category rules may be included in an environmental information, provided that they are manufactured by the same product manufacturer using the same processes.

Environmental information for forthcoming products shall include, at the cover page and in the product information section, one of the disclaimers, “Product not yet on the market – Results of this Environmental information shall be used with care as the LCI data is not yet based on 1 year of production which may result in increased uncertainty.“

The verification of forthcoming products shall be done according to the principles and procedures as per Kiwa-EE.

An environmental information of a product not yet on the market shall have the same validity periods as regular environmental information but shall be updated and re-verified when there is data available from one year of production. Once such data is available, an update and re-verification shall be done within six months, otherwise the environmental information shall be depublished. The contract with the validator/verifier shall ensure the validator/verifier takes part in the follow-up activities during the environmental information validity period.

If it is known that the product will not be produced, the environmental information shall be depublished.

8.1.2 Publication

The publication of the environmental information is carried out by Kiwa-EE. The publication of the project report is the sole responsibility of the customer.

Kiwa-EE aims to publish the information of customers and other interested parties is always sought by. The environmental informations created and valid within the framework of the environmental information programmes are published by Kiwa-EE in Kiwa-EE's own database with the consent of the declaration owner. Further publications in relevant databases etc. are offered by Kiwa-EE but are only carried out with the consent of the declaration owner.

For further details see the corresponding Programm (Appendix B).

8.1.3 Use of marks

The customer may affix the mark to the product in accordance with the environmental information programme if the environmental information has been published in accordance with the terms of these general program instructions and the associated environmental information programme. The customer is entitled to publicly announce that he is the owner of the environmental information.

Products without valid environmental information may not be labelled with a Kiwa identifying mark. The customer is obliged to remove any markings that have already been applied.

8.1.4 Handling of objections and complaints

Kiwa-EE records objections against decisions and handles them according to an internal process. Complaints are also recorded and processed according to a complaints procedure. Both objections and complaints are intended to contribute to the improvement of the overall process.

8.1.5 Revision, restriction, suspension, withdrawal and transfer

The Program Operator sends annual email notifications to the declaration owner to inform them about the opportunity to update their environmental information. Notifications are also issued when an environmental information is approaching its expiry date or has already expired. The declaration owner may provide updated information during this notification period or may contact the Program Operator at any time during the validity of the environmental information to request updates or revisions.

8.1.5.1 Revision

A revision of an existing environmental information will only take place under the following conditions:

- Correction due to technical or formal defects,
- if the change in the content or status of an environmental information results as a direct consequence of the result of a change notification. For this purpose, an annual query is made to the declaration owner.

A revised environmental information is differentiated by a newly assigned registration number. This ensures traceability.

The validity period of the declaration remains valid.

8.1.5.2 Restriction / Extension

An environmental information may be restricted in terms of content at the written request of the customer or in the event of non-conformity of the product or process of parts of the product range and/or products.

In order to clearly inform the customer about the limited scope of application, a new environmental information will be issued and, if necessary, published. The old environmental information is withdrawn.

The environmental information is issued with a newly assigned registration number.

The validity of the declaration remains valid.

8.1.5.3 Suspension

An environmental information is suspended in the following cases:

- if it can be proved that the assumptions on which the validation/verification decision is based can no longer be complied with,
- if the customer has voluntarily requested the suspension.

An environmental information can usually be suspended for 6 months or until the expiry of the environmental information (whichever is earlier).

A voluntary suspension ("dormant environmental information") can take place if a production stop (product) takes place (max. limited to 12 months). The publication is withdrawn.

In principle, the following applies during the suspension of the Environmental information:

- Customer shall make any necessary changes to public information.
- A written notification of the suspension of the environmental information will be sent to Kiwa-EE.
- The declaration owner may not change the product or the underlying assumptions leading to validation/verification during the suspension period.
- As soon as an environmental information is suspended, the status in the databases as well as in the public information sources must be updated by Kiwa-EE.

Termination of suspension:

- The suspension will be terminated by notification to Kiwa-EE.
- Termination of a voluntary suspension ("dormant environmental information"):

The customer provides written proof by means of suitable documents to Kiwa-EE that the assumptions on which the decision is based are again fully valid.

8.1.5.4 Withdrawal

The environmental information is withdrawn if the conditions for the issue of the environmental information are no longer met. The declaration owner can contact Kiwa-EE in writing to cancel the registration of the environmental information. A de-registered environmental information may no longer be used, and the assigned registration number may not be reused.

Reasons for the withdrawal of the environmental information can be:

- contractual conditions are no longer met, e.g.

- Task of production,
- The customer ceases its business operations (usually immediate withdrawal possible without prior suspension, if necessary with advance notice and setting a deadline),

- Result of an unlifted suspension
- Misuse of the Environmental information mark,
- Amendment of the legal basis,
- Significant change of raw materials / production process,
- Product specification has been changed.

8.1.5.5 Rewriting of environmental information

The paraphrasing of a declaration requires an application.

A distinction is made between:

- Change - product name in the declaration,
- Change - Name of the declaration owner.
- Modification of content (requires validator/verifier consent)
- Editorial changes / corrections

The validity of the declaration remains valid.

8.1.5.6 Special case: Transfer of environmental information

The transfer of a declaration to another declaration owner requires an application.

A distinction is made between:

Case 1: **Distributor or secondary environmental information (Initial Environmental information by the Validation / Verification Body (Kiwa-EE))**

- The customer obtains the products from the manufacturing plant and resells them under his own company and product name ("dealer or second certificate").
- The manufacturer has an initial environmental information from Kiwa-EE for these products.

Case 2: **Distributor or secondary environmental information (Initial Environmental information) not by the Validation / Verification Body (Kiwa-EE)**

- The customer obtains the products from the manufacturing plant and resells them under his own company and product name (distributor or second environmental information).
- The manufacturer has an initial environmental information for these products from another program operator.

If the review process for the transfer does not raise doubts about the integrity of the existing environmental information, Kiwa-EE can issue an environmental information without additional (evaluating) measures. In case 2, a new validation / verification is usually carried out.

The validation/verification decision will be carried out in accordance with the normal decision-making process and will be based on the information gathered in advance during the transfer review, as well as the results of the additional evaluation measures (if applicable).

The images used in the declaration, especially images on the front page, should be replaced if necessary. The validity of the declaration still applies.

8.2 Special case: Validation report on environmental sustainability [2]

The following aspects must be taken into account for the preparation and submission of the validation report:

- The validation report is prepared according to a template that meets the requirements of the CPR [2],

- The validation report is not published, the report is handed over to the economic operator for us,
- When transferring the validation reports, the regulations of Chapter 8.1.5.6 can be applied.

For this special case, the regulations under 6, 7 and 8, as far as it makes sense.

9 Monitoring of environmental information

Environmental information

Monitoring involves checking that the process and input data and facts are representative and up to date. The environmental information programmes leave open a review during the validity period. Monitoring measures between Kiwa-EE and the environmental information owner are recommended. This is where the comparison between the initial situation and the current situation is made (preferably once a year).

The comparison focuses on the parameters that, in Kiwa-EE's opinion, can lead to relevant changes in the results.

The following parameters are relevant here, for example:

- bill of materials / component bill of materials, energy mix used for manufacturing processes, changes in packaging,
- changes in suppliers (materials/geography),
- changes in logistics,
- relevant technological changes in the processes in the situation.

The monitoring check can take place in the form of a documentation check and/or on-site inspections. The relevance of the change must be assessed and if a new issue is required, relevant steps of the process must be repeated.

In accordance with the programmes (Appendix B), arrangements for changes or updating of environmental information are envisaged.

Special case: Validation report on environmental sustainability [2]

If the economic operator needs a modification of the DoPC in terms of environmental sustainability, the process of validation (see chapter 6) via Kiwa-EE is required.

Kiwa-EE decides whether the evidence for validation will be collected in the form of a document review and/or on-site inspections. The comparison between the initial situation and the current situation is made. The comparison focuses on the parameters that, in Kiwa-EE's opinion, could lead to relevant changes in the results.

After completion of the verification, a revision of the validation report is issued and handed over to the customer or economic operator within the meaning of the CPR.

10 Calculation rules

The calculation rules according to the individual programs apply, according to Appendix B.

To prepare the environmental sustainability validation reports [2] the general principles presented here on the calculation rules and the Program for Environmental information according to EN 15804 / ISO 21930, until further notice. In the future, product-specific harmonised technical specifications (hEN, EEAS), which will be published in the Official Journal of the European Union, will provide further calculation rules. These will then always have priority.

To ensure better handling and updating, these Appendixes should be revised independently of these general programme instructions.

Product Category Rules

In addition to the product sector-specific regulations (see environmental information programmes according to Appendix B), specific product category rules (PCR, PSR, PEFCR) form the basis for any environmental

information relevant here. Together, they h describe the requirements for the life cycle assessment In doing so, basic rules and minimum quality standards are defined for the respective product categories.

Some of these specific product category rules also have a normative European character.

It is possible to use multiple PCRs/PSRs with clear labelling for environmental information.

Kiwa-EE supports the standardization of product category rules by reviewing the adoption of easily accessible PCR/PSR documents for the same product category and from a comparable market region. In this context, cooperation with other program operators should be sought.

Third party PCRs / PSRs go through a defined recognition procedure at Kiwa-EE.

Appendix A: Applicable documents

Specifications

ISO 14025	Environmental labels and declarations - Type III environmental declararations - Principles and procedures (ISO 14025:2006); German and English version: EN ISO 14025:2011
ISO 14040	Environmental Management - Life Cycle Assessment - Principles and Frameworks (ISO 14040:2006 + Amd 1:2020); German version: EN ISO 14040:2006 + A1:2020
ISO 14044	Environmental Management - Life Cycle Assessment - Requirements and Guidelines (ISO 14044:2006 + Amd 1:2017 + Amd 2:2020); German version: EN ISO 14044:2006 + A1:2018 + A2:2020
ISO 14065	General principles and requirements for validation and verification bodies of environmental declarations (ISO 14065:2020); German version: EN ISO 14065:2021
ISO 14067	Greenhouse gases - Carbon footprint of products - Requirements and guidelines for quantification (ISO 14067:2018); German and English version: EN ISO 14067:2018
EN 15804	Sustainability of Construction works - Environmental Product Declarations - Basic Rules for the Product Category Construction Products; German version: EN 15804:2012+A2:2019 + AC:2021
EN 50693	Methods for quantitative, environmentally sound product design through life cycle assessments and environmental declarations by means of product category rules for electronic and electrotechnical equipment; German version: EN 50693:2019
EN 15941	Sustainability of buildings – data quality for the assessment of the environmental quality of products and structures – selection and application of data; German and English version: prEN 15941:2022
ISO/IEC 17020	Conformity assessment - requirements for the operation of different types of bodies carrying out inspections (ISO/IEC 17020:2012); German and English version: EN ISO/IEC 17020:2012
ISO/IEC 17025	General requirements for the competence of testing and calibration laboratories (ISO/IEC 17025:2017); German and English version: EN ISO/IEC 17025:2017
ISO/IEC 17029	Conformity assessment - General principles and requirements for validation and verification bodies (ISO/IEC 17029:2019); German and English version EN ISO/IEC 17029:2019
ISO/IEC 17065	Conformity assessment - Requirements for bodies certifying products, processes and services (ISO/IEC 17065:2012); German and English version: EN ISO/IEC 17065:2012

Other applicable documents

[1] REGULATION (EU) No 305/2011 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 9 March 2011 laying down harmonised conditions for the marketing of construction products and repealing Council Directive 89/106/EEC

[2] REGULATION (EU) 2024/3110 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 27 November 2024 laying down harmonised rules for the marketing of construction products and repealing Regulation (EU) No 305/2011

[3] COMMISSION RECOMMENDATION (EU) 2021/2279 of 15 December 2021 on the application of environmental footprint calculation methodologies for measuring and disclosing the environmental performance of products and organisations along their life cycle,
here: PEF Recommendations

[4] ECO PLATFORM - Tool Verification Guidelines (Version 1.1 (June 2024))

[5] ECO PLATFORM - Verification Guidelines for ECO EPD Programme Operators
(Version 8.0 (December 2024))

[6] Program EE 1202 of Kiwa-EE – Process Certification of Environmental Information
((Product level according to ISO 14025) Rev. 01)

[7] Muster-Verwaltungsvorschrift Technische Baubestimmungen (MVV TB) 2024/1 (350 pages)
Issue 2024/1; Official Announcements 2024/2 (Issue: 28 August 2024)

Appendix B: Overview of the environmental information programmes

The following programmes are listed under these general programme instructions.

Programme	normative or legal basis	status quo	Issue
Environmental Information Programme according to EN 15804 / ISO 21930	EN 15804 / ISO 21930	Rev. 01	18.12.2025
Environmental Information Programme according to EN 50693	EN 50693	in preparation	
Environmental Information Programme according to the PEF Recommendations	PEF recommendations [3]	in preparation	