

Core changes in the EPD Hub rules

Table of content

1. PCR - Allocation	2
2. PCR - Biogenic carbon	3
3. Background LCA report - Data quality (DQ) reporting	3
5. EPD and Background report - system boundary table	5
6. GPI - Annex I Clarification in EPDs of Multiple products and Multiple Manufacturing sites.	5
7. GPI - Updated rules on type of EPDs	5
8. GPI - Mass conversion tables, scaling tables and extrapolation rules	5
9. GPI - Rules on aggregating EPDs - Scaling table	6
10. PCR - Rules on Electricity and biogas	7
● EXAMPLE 1	7
● EXAMPLE 2	8
● EXAMPLE 3	8

1. PCR - Allocation

1.1. General allocation rules: editorial change to align with EN 15804+A2, namely no recommendation to avoid economic allocation.

1.2. Allocation procedures for processes producing co-products used in cement and concrete and other construction products

- steel production and granulated blast-furnace slag or crystallised basic oxygen furnace slag;
- coal fired electricity generation, fly ash and artificial gypsum, and other processes producing artificial gypsum;
- silicon metal and ferro-silicon alloys and silica fume and
- aluminium-oxide-containing sources arising from aluminium and alumina production.

For these co-products, economic allocation shall be used even if their contribution to the overall revenue of the process is very low (below 1%), to understand the impact, even if small, connected to these co-products.

Economic allocation should use market prices, averaged over a period in time as defined in ISO 14044 Amd2:2020 (chapter D4.3).

When assessing the impact of the high value co-products such as steel, electricity, silicon etc, economic allocation to these low value co-products used in cement and concrete can be omitted as a conservative choice. Other forms of allocation, for example, physical partitioning, system expansion or physical allocation, shall not be used to assign impacts to these low value co-products used in cement and concrete when assessing these high value co-products for use in ECO EPDs.

2. PCR - Biogenic carbon

Balancing for materials and processes which do not contain actual biogenic carbon is not needed, as well in situations where emissions are related to emissions of CO and CH₄.

Balancing approach for packaging materials:

- If the mass of biogenic carbon containing materials in the product is less than 5 % of the mass of the packaging - **optional** to declare
A5 in scope - balance in A5
A5 not in scope - balance in A3 or A1-A3
- If the mass of biogenic carbon containing materials in the product is more than 5% of the mass of the packaging - **mandatory** to declare
A5 in scope - balance in A5
A5 not in scope - in A3 or A1-A3 (when aggregated) + statement *"balancing-out reporting" approach was followed*

3. Background LCA report - Data quality (DQ) reporting

Per Table E.2 from EN 15804+A2. This table is currently available on the BR but is not datapoint-specific. Rules from EN 15941 should be followed. DQR can be in BGR but sentences that summarise results should be also in the EPD report. If there is any poor or very poor data it should be mentioned or if over 30% of fair data are used it should be mentioned too. Also use of specific EPDs should be stated. (source: Eco platform checklist, EN15941 Annex C, Example II)

Summary sentence example to be used in EPD:

*This is an Industry Association declaration which uses manufacturing data covering **98 %** of production from the three member companies of the Ambrosian Widget Association. It is based on data covering the year **2019** from factories in Ambrosia. The **end-of-life stage** is also representative for Ambrosia. Widgets are made **by mixing X and Y** in a mould and heating under pressure. Background data was sourced from the ZZZ 2019 **database** and the Ambrosian sector **EPD for Y was also used**. Data quality according to EN 15804:2012+A2:2019, Annex E, only E.2 was assessed, and the use of **poor and very poor relevant data is provided** in Table C.1, together with fair data with more than 30 % of impact.*

Table C.1 — data quality information for Example 2

Data set	Criteria	Data Quality Level	Reason for Level	Reason for using	Relevance
X	Geo	Poor	Data for another region	No other data available	30 % of GWP, 10 % to 20 % of other core impacts
Ambrosian Electricity	Time	Poor	Grid mix from 2010	More recent data not available in the database	35 % of GWP, 20 % to 30 % of other core impact indicators.

5. EPD and Background report - system boundary table

-Has new format, including Geography, Specific data, Variation-products and Variation-sites

	Product stage			Construction process stage		Use stage							End of life stage				Resource recovery stage
	Raw material supply	Transport	Manufacturing	Transport	Construction installation	Use	Maintenance	Repair	Replacement	Refurbishment	Operational energy use	Operational water use	De-construction demolition	Transport	Waste processing	Disposal	Reuse-Recovery-Recycling-potential
Module	A1	A2	A3	A4	A5	B1	B2	B3	B4	B5	B6	B7	C1	C2	C3	C4	D
Modules declared																	
Geography																	
Specific data used						-	-	-	-	-	-	-	-	-	-	-	-
Variation – products						-	-	-	-	-	-	-	-	-	-	-	-
Variation – sites						-	-	-	-	-	-	-	-	-	-	-	-

6. GPI - Annex I Clarification in EPDs of Multiple products and Multiple Manufacturing sites.

6.1. Declared format of GWP fossil variation: *“If this difference is less than 10%, it may be reported as “<10%”. Alternatively, the variation can be expressed as the difference between the declared result and the lowest and highest results, respectively (e.g. -5%/+12%).”*

6.2. Requirements for creating EPDs of multiple products - 3 types of aggregation of multiple products EPDs

7. GPI - Updated rules on type of EPDs

- **Project EPD:** (1) no limit on GWP fossil A1-A3, but exceedance of 50% shall be justified; (2) validity changed from 3 to 5 years
- **White-label EPDs:** (1) have identical results as parent EPD; (2) for EPD owners who are traders (e.g., retailers, wholesalers), including module A4 is required. This module shall, at minimum, cover transport to a central warehouse or the market boundary of the EPD scope.

8. GPI - Mass conversion tables, scaling tables and extrapolation rules

Clarification of appendix content is verified and also ban on extrapolation tables for different performance ratings.

9. GPI - Rules on EPDs of multiple products and manufacturing sites + Scaling table

9.1. Mandatory statement of the type of grouping

“EPD of multiple products, based on the average results of the product group”, “EPD of multiple products, based on a representative product”, or “EPD of multiple products, based on worst-case results”.

9.2. Examples of scaling tables

- Templates for scaling tables to be included in the Annex of the EPD document are provided below.
- For EN 15804+A2-compliant EPDs, only GWP indicators are permitted. However, additional core indicators may be included in CML or TRACI result tables that are relevant for the products markets.

Impact category		Unit	A1-A3	A1-A3
Product Thickness (optional)		mm	40	60
Product Weight		kg/DU	1	1.5
EN 15804+A2, PEF	GWP – total	kg CO ₂ e	-	-
	GWP – fossil	kg CO ₂ e	-	-
	GWP – biogenic	kg CO ₂ e	-	-
	GWP – luluc	kg CO ₂ e	-	-

- EPDs can have scaling tables in an Annex for GWP data only. If other indicators are used, it shall be justified in the LCA report. Other impact categories (in case of EN15804+A2 compliant EPDs) or life cycle stages (A-C) within a single scaling table are allowed only in specific cases where national requirements apply. Example template for scaling table for these situations is below:

Impact category		Unit	A-C	A-C	A-C
Product Thickness (optional)		mm	40	60	80
Product Weight		kg/DU	1	2	3
EN 15804+A2, PEF	GWP – total	kg CO ₂ e	-	-	-
	GWP – fossil	kg CO ₂ e	-	-	-
	GWP – biogenic	kg CO ₂ e	-	-	-
	GWP – LULUC	kg CO ₂ e	-	-	-
	Ozone depletion pot.	kg CFC-11e	-	-	-
	Acidification potential	mol H ⁺ e	-	-	-
	EP-freshwater	kg P e	-	-	-
	EP-marine	kg N e	-	-	-
	EP-terrestrial	mol N e	-	-	-
	POCP (“smog”)	kg NMVOC e	-	-	-
	ADP-minerals & metals	kg Sb e	-	-	-
	ADP-fossil resources	MJ	-	-	-
	Water use	m ³ e depr.	-	-	-

10. PCR - Rules on Electricity and biogas

Examples¹: Electricity from the grid (EN 15941 E.2.2.2) as referred in the ECO Platform standards.

- **EXAMPLE 1**

A manufacturer buys electricity from the grid in a region where a registry for renewable electricity with GO exists and also cancels GO to cover the electricity supplied. The manufacturer will use data sets to represent the type of generation covered by the GO to model the electricity used in the factory.

- **Example GO electricity model in France²:**

Hydro	50.05%	4.71%	<i>Electricity, high voltage {FR} electricity production, hydro, pumped storage Cut-off, U</i>
		7.25%	<i>Electricity, high voltage {FR} electricity production, hydro, reservoir, alpine region Cut-off, U</i>
		38.09%	<i>Electricity, high voltage {FR} electricity production, hydro, run-of-river Cut-off, U</i>
Wind	42.84%	2.58%	<i>Electricity, high voltage {FR} electricity production, wind, <1MW turbine, onshore Cut-off, U</i>
		0.17%	<i>Electricity, high voltage {FR} electricity production, wind, >3MW turbine, onshore Cut-off, U</i>
		0.02%	<i>Electricity, high voltage {FR} electricity production, wind, 1-3MW turbine, offshore Cut-off, U</i>
		40.08%	<i>Electricity, high voltage {FR} electricity production, wind, 1-3MW turbine, onshore Cut-off, U</i>
Biomass	4.70%	3.78%	<i>Electricity, high voltage {FR} heat and power co-generation, wood chips, 6667 kW, state-of-the-art 2014 Cut-off, U</i>
		0.93%	<i>Electricity, high voltage {FR} heat and power co-generation, biogas, gas engine Cut-off, U</i>
Solar	2.40%	0.99%	<i>Electricity, low voltage {FR} electricity production, photovoltaic, 3kWp slanted-roof installation, multi-Si, panel, mounted Cut-off, U</i>
		0.80%	<i>Electricity, low voltage {FR} electricity production, photovoltaic, 3kWp slanted-roof installation, single-Si, panel, mounted Cut-off, U</i>
		0.62%	<i>Electricity, low voltage {FR} electricity production, photovoltaic, 570kWp open ground installation, multi-Si Cut-off, U</i>

¹ The shared examples are used to illustrate modeling scenarios; alternative approaches that are justifiable can also be considered.

² The percentages have been extracted from consumption mix data of France in Elv3.10.

- **EXAMPLE 2³**

A manufacturer buys electricity from the grid in a region where a registry for renewable electricity with GO exists, but neither the manufacturer nor the supplier use or cancel any GO to cover the electricity supplied. The manufacturer will use the residual mix for the region to model the electricity used in the factory.

- [Example residual mix electricity model in France:](#)

Electricity, medium voltage, residual mix (Reference product: electricity, medium voltage)

- **EXAMPLE 3**

A manufacturer buys electricity from the grid in a region where no registry for renewable electricity with GO exists. The manufacturer will use the consumption mix for the region to model the electricity used in the factory.

- [Example consumption mix electricity model in France:](#)

Market for electricity, medium voltage (Reference product: electricity, medium voltage)

Note 1: Transformation, transmission and distribution losses shall be considered when applicable (LCA Calculation rules v2.0, 2.5.1).

³ The shared examples are used to illustrate modeling scenarios; alternative approaches that are justifiable can also be considered.

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Table 2 Requirements for use of market-based or location-based approaches

	Situation regarding contractual instruments for the market-based approach	Foreground data [see Note 1]	
		Market-based approach – foreground data	Location-based approach – foreground data
Case 1a) Manufacturer produces energy on site and uses it	No contractual instruments have been sold	Own generation mix	Own generation mix
	Contractual instruments have been sold	Residual mix	
Case 1b) Manufacturer produces electricity on site and exports it	Renewable electricity is exported with or without contractual instruments	Account for consumed electricity as for Case 1a) above. Any imports to have residual mix, unless contractual instruments have been purchased in which case, contractual instrument mix	Account for consumed electricity using own generation mix, imports to have consumption mix
Case 1c) Direct connection	with contractual instruments	Contractual instrument mix [direct connection mix]	Direct connection mix
	without contractual instruments, no contractual instruments sold	Direct connection mix	
	Contractual instruments sold to others	Residual mix	
Case 2 National state with mandatory electricity labelling, e.g. Austria, Switzerland		Supplier mix, see Note 2	
Case 3a) National state or region with single registry and published residual mix, e.g. EU, UK	with contractual instruments	Contractual instrument mix	Consumption mix
	without contractual instruments	Residual mix	
Case 3b) National state or region with a “single reliable and transparent book and claim registry” outside EU, with no published residual mix	with contractual instruments	Contractual instrument mix	Consumption mix
	without contractual instruments	Consumption mix minus all renewables [conservative]	

The image above displays a table with a selection of LCA calculation rules for electricity modelling from the ECO Platform. For further information, please refer to the complete document.