

ECO PLATFORM

Quality Management Guidelines for ECO EPD Programme Operators

(hereafter: QM Guidelines)

Version 2.0 (December 2024)

Table 1: Version of this document

Version Number	Date	Summary of changes
V1.0	20.06.2024	First version of ECO Platform Quality Management Guidelines after separation of "Audit and Verification Guidelines V6" into separate documents
V2.0	20.12.2024	Second version, incorporating requirements for independence and impartiality of PO, complaint procedure and document control

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1 SCOPE

The ECO Platform is committed to keeping its quality promise and ensuring compliance with the applicable ECO Platform rules and requirements defined in the “ECO Platform Standards”. The enforcement of these rules and requirements is crucial to protect ECO Platform’s reputation as well as the credibility of the ECO EPDs.

The “Quality Management Guidelines for ECO EPD Programme Operators” hereafter called QM Guidelines provide the requirements concerning required quality management processes at ECO EPD Programme Operators (POs). The QM Guidelines comprise an overall requirements document which sets out the minimum quality management framework required at ECO EPD POs.

Quality management processes at ECO EPD POs should follow a systematic approach that reflects the familiar “plan-do-check-act” structure of formal QM systems. For each theme, there must be a stated objective or requirement, one or more defined practical actions that enable the objective to be reached, a mechanism to monitor progress towards the objective and periodic review of progress.

The Audit Teams’ requirements and checklists to check the PO compliance regarding the individual subjects can be found in the latest version of the **ECO Platform Audit Requirements**.

All **ECO Platform Standard documents** can be found on the ECO Platform website under the following link:

<https://www.eco-platform.org/our-relevant-documents.html>

2 INDEPENDENCE & IMPARTIALITY

2.1 Impartiality and independence of POs

Impartiality is interpreted as the presence of objectivity (following ISO 17029). This means that decisions of the PO shall be based on objective evidence, and that conflicts of interest do not exist or are resolved so as not to adversely influence the PO's activities and decisions.

Programme Operators and their personnel must be impartial, and be perceived as impartial. Risks to impartiality include bias that may arise from:

- a) self-interest (e.g. overdependence on a contract, or fear of losing the client or fear of becoming unemployed to an extent that adversely affects impartiality);
- b) self-review (e.g. the PO evaluates the results of other services it has already provided, such as consultancy or EPD development);
- c) advocacy (e.g. the PO or its personnel acting in support of, or in opposition to, a particular company which is at the same time its client);
- d) over-familiarity, i.e. risks that arise from a PO or its personnel, contractors or appointed agents being overly familiar or too trusting, instead of seeking evidence on which to base decisions (in the context of EPD Programme operation and EPD verification, this risk is both important and difficult to manage because the need for personnel with very specific expertise often limits the availability of suitably-qualified personnel);
- e) intimidation (e.g. the PO or its personnel can be deterred from acting impartially by risks from, or fear of, a client or other interested party);
- f) competition (e.g. between the client and a contracted person).

Requirements for Impartiality & independence

Top management of the PO understands the importance of impartiality; its commitment to impartiality is visible in policies or equivalent documents.

The top management and all employees of a PO are under an obligation to ensure impartiality in all activities.

The PO must implement a mechanism for safeguarding its impartiality. The mechanism shall provide input on the following:

- a) *the policies and principles relating to the impartiality of its activities;*
- b) *any tendency on the part of a programme operator to allow commercial or other considerations to prevent the consistent impartial operation of the Programme, including PCR development, EPD verification and publication;*
- c) *matters affecting impartiality and confidence in certification, including openness.*

The mechanism shall address at least the following critical factors (adapted from ISO17065:2013):

- *Financial ownership of the institution; direct & indirect*
- *Top management selection and structure*
- *Relationships with external organisations (commercial and non-commercial)*
- *Provision of consultancy*
- *Advocacy activities*

Note: If the PO is a Verification/Validation Body accredited by a recognized Conformity Assessment Body, the fundamental principles on impartiality, independence and competence are considered to be met (see also Audit Requirements), as long as the verification/validation activities are carried out in accordance with EN ISO/IEC 17029 and ISO 14065, or ISO 17065.

2.2 Independence of verification

Verifiers, regardless of whether they are internal or external to the organization, shall not have been engaged in conducting the LCA or crafting the declaration, and must be devoid of conflicts of interest stemming from their organizational position (see ISO 14025, 8.2.1).

This in particular includes the following:

Technical and Managerial Independence:

The verifier responsible for Life Cycle Assessment (LCA) and Environmental Product Declaration (EPD) verification shall maintain complete independence from the LCA practitioner and the manufacturer/group of manufacturers/clients. This independence ensures unbiased evaluation and decision-making throughout the verification process.

Avoidance of Financial Pressure:

The PO is committed to preventing any financial pressures that could compromise the independence or impartiality of the verifier. Measures shall be in place to mitigate such pressures, ensuring that verification outcomes are solely based on merit and compliance with established standards.

Preservation of Independence for Unbiased Outcomes:

Recognizing the significance of independence in upholding the integrity of verification results, any influence on the verification process or outcomes shall be strictly avoided. This independence safeguards the credibility and reliability of the verification services, providing stakeholders with assurance in the accuracy of the information presented.

3 VERIFIER APPROVAL & COMPETENCE

3.1 Verifier approval and appointment

In line with ISO 14025, an appointment and registration procedure for verifiers shall be part of the ECO EPD PO's programme rules.

3.2 Verifier Competence

Competence requirements for verifiers shall be established in line with ISO 14025, 8.2.2. The appointment & registration procedure shall include an arbitration procedure in case of complaints.

The PO must ensure that the knowledge and experience of the verifier or verification team is available and up to date at the time of verification.

3.3 Communication of updates

To ensure the quality of the ECO EPDs, changes of requirements defined in the ECO Platform Standards must be incorporated in the PO's documents/procedures in a timely manner and subsequently communicated to all stakeholders to ensure a high quality of EPD verification based on the most recent requirements.

At a minimum, the PO is required to establish a process to disseminate information regarding new developments in the ECO Platform Standards to its verifiers. This entails establishing a mechanism for sharing updates on the general Life Cycle Assessment (LCA) methodology as set out in the ECO Platform LCA Calculation Rules.

The timeline, including implementation periods, is detailed in the ECO Platform General Remarks document.

4 GPI & PCR DEVELOPMENT AND MAINTENANCE

4.1 Procedures for development, maintenance and review of GPI

As manager of a Type III environmental declaration programme, the ECO EPD PO shall:

- prepare, maintain and communicate general programme instructions (GPI) that include the information specified in ISO 14025, 6.3a, 6.4
- periodically review the GPI to ensure continued relevance and to take account of new developments, including developments in related Type III environmental declaration programmes (see ISO 14025, 6.4i)

4.2 Procedures for development, maintenance and review of PCR

The ECO EPD shall also develop and implement:

- within the scope of the GPI, a procedure for development and maintenance of PCR (see ISO 14025, 6.4i)

- a transparent procedure for PCR review in line with the requirements of ISO14025 8.1.2, including the scope and details of the review and how the PCR review panel is constituted (see ISO 14025, 5.7)
- a procedure for the adequate selection of PCR review panel members (see ISO 14025, 6.3h)
- establish minimum requirements for competence of the PCR review panel (see ISO 14025, 8.2.3)
- procedures to ensure that new developments are included in the PCR

5 INVOLVEMENT OF INTERESTED PARTIES

5.1 GPI & PCR Development

The PO shall organise appropriate consultations to ensure credibility and transparency in the operation of the programme (see ISO14025, 5.5). The scope of consultations shall include PCR development and rules for the development and verification of EPD, as specified in ISO14025 6.5.

The names of organisations involved in programme development as interested parties shall be published (ISO 14025 6.3.b).

5.2 Complaint procedure / feedback handling

The PO shall establish and implement a procedure to handle comments, questions, and complaints from stakeholders (verifier, LCA practitioner, competitor, user of EPD, etc.). This procedure shall include procedures for follow-up, resolution and management review of complaints to inform improvement and a mechanism for arbitration in the event of disputes. A procedure and timeline for suspension and withdrawal of non-compliant EPD shall be determined.

Explanatory note

Management review of complaints is particularly important to ensure that the number of (similar) justified complaints reduces over time. It implicitly requires classification of complaints, for example by PCR and by product type, by verifier, by the nature of the claimed non-compliance, etc. - so that the underlying causes can be found and addressed. Complaints can also refer to room of interpretation in standards – such a need for harmonization shall be brought forward to ECO Platform.

6 DOCUMENTATION

6.1 Data confidentiality management

As part of the GPI, the PO shall ensure that procedures for data confidentiality management are established and implemented (see ISO 14025 6.4h).

6.2 Document control and accessibility

PO shall have a procedure in place for issue, approval, registration and update of documents relating to the correct operation of the EPD programme.

6.3 Data consistency

The ECO EPD PO shall also establish and implement procedures to safeguard the consistency of data within the programme (see ISO14025, 6.3d).