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TEWOG conclusion on the applicability of data based on the Together for Sustainability Guideline for EPDs

Technical Working Group (TEWOG)

Background and Purpose

ECO Platform's Technical Working Group (TEWOG) has been asked regarding the understanding of compatibility of the *Product Carbon Footprint Guideline for the Chemical Industry, Version 2.1 – February 2024*¹ (referred to as *TfS Guideline* in this document) of the Together for Sustainability (TfS) initiative² with the Environmental Product Declaration (EPD) scheme as it is represented by ECO Platform.

TEWOG Conclusions

TEWOG concluded in the meeting of April 25th, 2024 that:

- The calculation rules for the development of EPDs are governed by a set of International and European standards, specifically EN 15804, and supplemented by the specific rules of EPD Program Operators, in their General Program Instructions, Product Category Rules, and supplemental documentation.
- The TfS Guideline provides rules for the calculation of Product Carbon Footprint (PCF), while the EPD scheme is based on a multi-indicator Life Cycle Assessment, as defined in EN 15804 and the additional documentation.
- Any data used for the development of EPDs must support the calculation of all indicators required by the rules that are applicable for EPDs. As such, data developed based on the TfS Guideline as a document governing the calculation of Product Carbon Footprints only, is not applicable for use in the EPD development process.
- It should be noted that it is not the explicit intention of the TfS Guideline to provide guidance on delivering data for developing EPDs.
- Also, the calculation rules established in the TfS Guideline are not completely coherent to the requirements set forth in EN 15804. This applies to a range of aspects, including, among others:
 - o The description of the life cycle and the modular breakdown of information is not coherent with EN 15804,
 - o Deviating definitions regarding the end-of-life of products and use of secondary resources,
 - o Etc.
- The TfS Guideline explicitly permits the use of mass balance calculations as an acceptable means of attributing certain input parameters to products. It needs to be noted that, in the absence of clear guidance in standardization, ECO Platform decided that the use of mass balance is not acceptable for any EPDs within the scope of ECO Platform³.

Based on these findings, TEWOG concluded that data that are developed based on the TfS Guideline do not qualify as input information for the development of EPD without securing consistency with EN 15804 and the subsequent documentation.

¹ See https://www.tfs-initiative.com/app/uploads/2024/03/TfS_PCF_guidelines_2024_EN_pages-low.pdf

² See <https://www.tfs-initiative.com/>

³ See https://www.eco-platform.org/files/download/statements/ECO_2023-01-31_Statement_MBA.pdf and https://www.eco-platform.org/files/download/statements/ECO_2023.12.12_revised-Statement_MBA%2BG00s.pdf