

## Briefing Document: ISO 14025:2006 - Type III Environmental Declarations

**Subject:** Review of ISO 14025:2006 - Type III Environmental Declarations

### Executive Summary:

ISO 14025:2006 provides principles and procedures for developing Type III environmental declaration programmes and the declarations themselves. These declarations, primarily intended for business-to-business communication, provide quantified environmental information on the life cycle of products based on independently verified data, allowing for comparisons between products fulfilling the same function. Key aspects covered include the voluntary nature of these declarations, the crucial role of a life cycle basis, the need for modularity in data, the importance of interested party involvement, the requirement for comparability, and the necessity of verification. The standard outlines the responsibilities of a "programme operator" who administers the declaration program and details the content and requirements for both the program and the individual declarations, including specific provisions for business-to-consumer communication.

### Main Themes and Important Ideas/Facts:

#### 1. Purpose and Scope of Type III Environmental Declarations:

**Goal:** To "encourage the demand for, and supply of, those products that cause less stress on the environment, through communication of verifiable and accurate information that is not misleading, thereby stimulating the potential for market-driven continuous environmental improvement."

**Objectives:** Provide LCA-based and additional environmental information.

Assist purchasers and users in making informed comparisons between products (though they are *not* comparative assertions in themselves).

Encourage improvement of environmental performance.

Provide information for assessing environmental impacts over a product's life cycle.

**Audience:** Primarily for business-to-business communication but use in business-to-consumer communication is permitted under certain conditions (see section 5 below).

**Voluntary Nature:** The development and use of these programs and declarations are voluntary.

**Legally Required Information:** This standard does not override or change legally required environmental information.

#### 2. Foundation in Life Cycle Assessment (LCA):

**Life Cycle Basis:** Type III environmental declarations *must* consider all relevant environmental aspects throughout the product's life cycle. If all stages are not covered, this must be stated and justified.

**Use of ISO 14040 Series:** The data used for these declarations must be generated using the principles, framework, methodologies, and practices established by the ISO 14040 series of standards (ISO 14040 and ISO 14044).

**Methodological Options:** Two main options for developing declarations are based on LCA studies:

**Option A:** Includes all phases of LCA (goal and scope, inventory analysis (LCI), impact assessment (LCIA), interpretation).

**Option B:** Includes goal and scope, inventory analysis (LCI), and interpretation.

**Additional Environmental Information:** Relevant environmental aspects not covered by LCA should be addressed using other appropriate methods and included as additional information.

### 3. Programme and Declaration Requirements:

**Programme Operator:** A body (company, industry sector, public authority, etc.) that administers the Type III environmental declaration program.

**General Programme Instructions:** The programme operator must prepare and maintain instructions describing the program's operation, including scope, objectives, interested party involvement, procedures for PCR development, verification, data management, and more. These instructions must be publicly available.

**Product Category Rules (PCR):** A "set of specific rules, requirements and guidelines for developing Type III environmental declarations... for one or more product categories."

PCR must be developed through an established consultation process including interested parties.

PCR define the product category, goal and scope of the LCA, inventory analysis requirements, impact category selection (if applicable), predetermined parameters for reporting, additional environmental information requirements, and instructions for generating and presenting the declaration.

**Declaration Content:** Each Type III environmental declaration must include specific information:

Identification of the organization and product.

Programme and programme operator details.

PCR identification, publication date, and validity period.

Quantified data from LCA, LCI, or information modules (separated into LCI data, LCIA indicator results if applicable, and other data like waste).

Additional environmental information, clearly separated from LCA/LCI/information module data.

Content declaration covering materials and substances of environmental significance.

Information on any life cycle stages not considered.

A statement that environmental declarations from different programmes may not be comparable.

Information on where explanatory material can be obtained.

**Modularity:** LCA-based data for materials, parts, and inputs ("information modules") can be used to contribute to declarations for other products, provided they are adjusted according to the PCR.

### 4. Verification and Transparency:

**Verification is Crucial:** To ensure credibility and accuracy, Type III environmental declarations and the data they are based on must be independently verified.

**Verification Procedures:** The programme operator must establish transparent procedures for:

PCR review (by a third-party panel).

Independent verification of the LCA, LCI, information modules, and additional environmental information.

Independent verification of the Type III environmental declaration itself.

**Independence and Competence:** Verifiers and PCR review panel members must be independent and possess specific competencies related to the sector, LCA, relevant standards, and the regulatory framework.

**Transparency:** Programme operators must ensure the availability of general programme instructions, PCR documents, a list of published PCR and declarations, and explanatory material.

**Data Confidentiality:** While declarations contain aggregated data, confidential business data used for verification is not required to be made public and must be kept confidential.

## **5. Business-to-Consumer (B-to-C) Communication:**

**Additional Requirements:** When declarations are intended for or likely to be used by consumers, additional requirements apply.

**Content:** The full content required by the PCR must be included; no part shall be omitted or simplified.

**Life Cycle Coverage:** Declarations for B-to-C must be based on the full life cycle, unless specific stages are unavailable or environmentally insignificant (with justification). Reasonable scenarios for specific stages should not be excluded.

**Availability:** Declarations for B-to-C must be available to the consumer at the point of purchase.

**Explanatory Material:** The organization making the declaration must provide explanatory material to facilitate consumer understanding.

**Interested Party Involvement:** B-to-C programs/declarations must include representatives of consumer and environmental interests in the interested party process.

**Third-Party Verification:** Verification for B-to-C declarations *must* be carried out by a third party. This must be clearly stated in the declaration.

## **6. Comparability:**

**Intended for Comparison:** Type III environmental declarations are intended to allow comparison of environmental performance of products fulfilling the same function.

**Conditions for Comparability:** Comparability is deemed achieved when several conditions are met, primarily revolving around the identical nature of the product category definition, functional unit, criteria for inclusion, units, impact category selection and calculation rules, and predetermined parameters. Equivalence is required for system boundary, data description and quality, inventory analysis methods, allocation procedures, requirements for additional environmental information, materials and substances declared, and instructions for data production and declaration content/format.

**Limitations:** Comparability can be limited if declarations are not based on a full life cycle LCA or are based on different PCRs. This limitation should be transparently stated

## **Conclusion:**

ISO 14025:2006 provides a comprehensive framework for developing and using Type III environmental declarations. By standardizing the process, requiring a life cycle approach, emphasizing transparency and verification, and outlining specific requirements for different communication contexts, it aims to provide reliable and comparable environmental information about products to support market-driven environmental improvement. The standard highlights the essential role of the programme operator and the importance of involving interested parties throughout the process.