

# EFI Program

EFI Environmental Product Declarations Program General Instructions



ENVIRONMENTAL FOOTPRINT INSTITUTE

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This is a direct translation of the original EFI Program Instructions in Spanish "Instrucciones generales del Programa EFI de declaraciones ambientales de product" rev 3, nov 2024. In case of discrepancy, the Spanish version will prevail.

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## **1. INTRODUCTION**

The Environmental Footprint Institute has launched its Environmental Footprint Declarations Program, called the "EFI Program" to ease and encourage objective assessment and transparent communication of the environmental impacts associated with the life cycle of products and services.

Life cycle assessment is a powerful tool for environmental improvement because: it makes the detection of critical points in production systems easier, and it also allows an objective assessment of the effectiveness of environmental improvement measures carried out by organizations.

The EFI Program Instructions list and describe the steps to be followed for the preparation of Environmental Product Declarations, or any other environmental assessment report, to be registered and verified under the EFI Program.

## **2. PROGRAM OBJECTIVES AND SCOPE**

The main objective of the Environmental Footprint Institute's EFI Program is to promote the analysis and dissemination of environmental information, calculated in an objective and verified way, of the products created by any organization. This objective contributes both to the global recognition of the importance of reducing environmental impacts, and to the creation of policies to mitigate these impacts, improving the competitiveness of products participating in the program.

To do so, the EFI Program provides organizations with the instructions to develop Environmental Product Declarations through this voluntary program of Type III environmental declarations according to the international standard ISO 14025, through the application of Life Cycle Assessment according to ISO 14040 and ISO 14044 standards and following the recommendations of the European Commission's ILCD system.

The Scope of this program includes all sectors of activity, as well as any type of product or service, with no geographical limitations. Any organization can transparently report about the environmental impacts of its products or services by following these General Instructions of the EFI Program.

All the Environmental Declarations developed within this program will be publicly available, both through the web sites of the Environmental Footprint Institute, as well as through other means of dissemination. Therefore, there is no possibility of making Environmental Declarations with a confidential scope, since the main objective of the program is the dissemination of the environmental impacts of the products and services registered.

Environmental Declarations within this program are based on Product Category Rules. The method of creating these Category Rules is detailed later in these Instructions.

### **3. PROGRAM MANAGEMENT**

#### **3.1. Overview**

The Environmental Footprint Institute acts as Program Administrator and Verifier, as defined in the ISO 14025 Standard.

The Environmental Footprint Institute does not prepare Environmental Declarations, nor does it perform consulting work on Life Cycle Assessment or other environmental impacts if this work is intended for the development of an Environmental Declaration to be included in this Program.

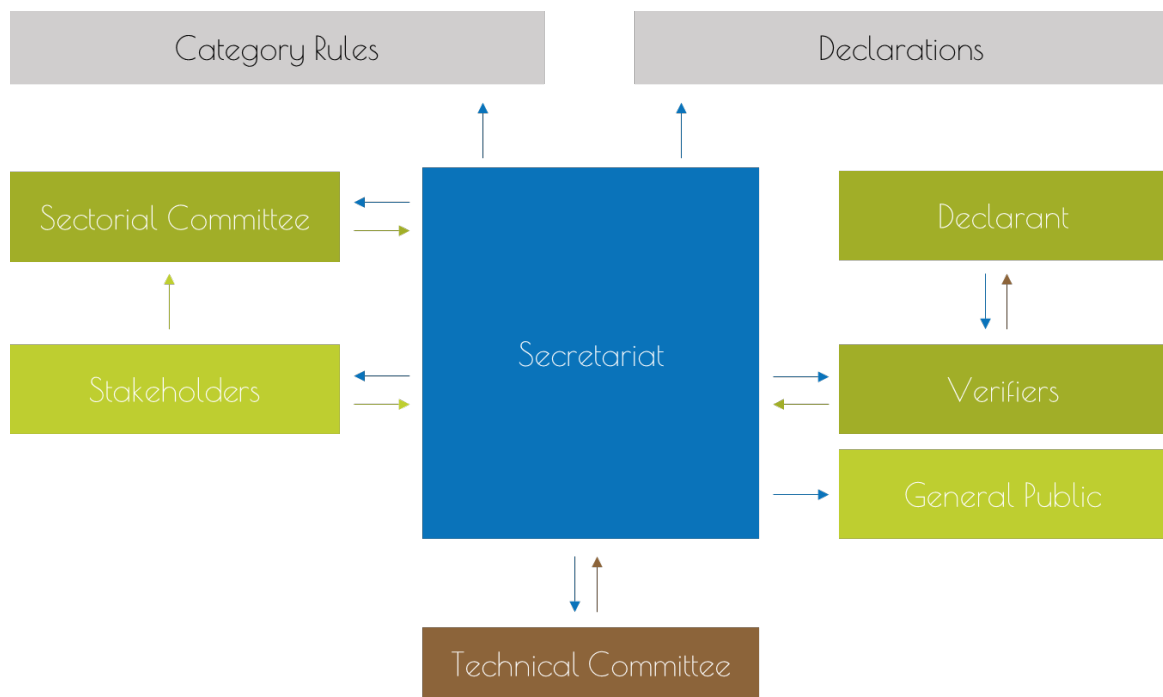


Figure 1 - General outline of participants in the Program

The EFI Program is open to the participation of any interested party, both in the development of Category Rules and in the creation of Environmental Declarations, in Sectoral Panels, or through participation in forums, discussions or any type of related activity proposed by the Environmental Footprint Institute. Likewise, the Environmental Footprint Institute is open to the participation of external Verifiers prepared to verify Declarations within this Program.

### 3.2. Secretariat and Technical Committee

The main tasks of the Environmental Footprint Institute, through its Secretariat and its Technical Committee, within the Program are:

- Propose and maintain the Program Instructions.
- Ensure that these Instructions are properly followed by all participating parties.
- Manage the creation of Product Category Rules, moderate stakeholder discussion before, during and after the creation of

each Rule, and publish or make available to any interested party the documents of each completed PCR.

- Review each PCR before its final publication,
- Make the harmonization of the existing Category Rules in the Program easier.
- Validate "additional environmental information" that may be included in the Product Category Rules.
- Decide on the need for external verifiers in the review of Declarations following these Program Instructions.
- Assign an internal or external verifier for the independent review of candidate declarations to be registered as an Environmental Footprint Declaration.
- Perform a periodic review of the requirements for verifiers validated in the Program.
- Develop communication and divulgation materials for the spreading and adequate use of the Declarations included in this Program.
- Expedite the certificates accrediting the registration of the Declarations within the Program.
- Manage and keep a registry of the products and services registered under the Program.
- Establish procedures for the management of the inappropriate use of the Program's name and image, as well as the Declarations registered and the Category Rules that belong to the Program.

### 3.3. Sectoral Committees

The role of the **Sectoral Committees** is to develop, review and update the Product Category Rules.

Sectoral Committees shall be created at the initiative of the Environmental Footprint Institute or through a proposal by any interested party external to the Institute, when it is proven that there is a general or sectoral interest in the development of a Product Category Rule that does not already exist, or in updating or modifying one already valid.

Sectoral Committees shall not be permanent and shall have the necessary duration to carry out their work, and may be dissolved when the creation, revision or updating of a Category Rule has been completed.

The composition of each Sector Committee shall be as follows:

- A Coordinator, proposed by the Environmental Footprint Institute, whose task will be to manage the correct development or modification of each Category Rule according to the specifications of this Program. The Coordinator's tasks are to manage and file the documentation used and generated by the Committee, ensure compliance with the Program Instructions and the deadlines foreseen for the development of the Category Rules, resolve the technical queries raised by the Sector Committee regarding the operation of the Program and ensure the transparency of all the processes for the creation of Product Category Rules.
- A Technical Responsible, proposed by the entity that has initiated the proposal for the creation of the Category Rule to be developed, who must be an expert with proven experience in the subject matter to be dealt with. The Technical Manager must be approved by the Technical Committee of the Environmental Footprint Institute. The task of the Technical Responsible is to materialize the Category Rule under development, and to coordinate the interested parties, according to the Program Instructions, for the correct development of the document to be presented for public consultation, and to make the pertinent modifications after the public consultation phase, including the calling of meetings, creation of documents, technical methods of voting within the committee, and spreading the information generated among the members of the Sectoral Committee.
- Sectoral experts, proposed by the Coordinator, the Technical Responsible, or by external nominations. There is no minimum or maximum number of sectoral experts in each Sectoral Committee.

The sectoral experts must be physical individuals, and may act on behalf of sectoral groups, organizations or companies, with proven knowledge and experience in the sector of interest to the Sectoral Committee. Their task is to actively participate in the development of the Category Rule for which the Sector Committee to which they belong was created. Nominations for Sector Expert will be approved by the Coordinator and the Technical Manager. In the case of a tie, the Footprint Institute reserves the right to accept or reject each nomination.

The Technical Responsibles and Sector Experts shall participate in the Sector Committees on a voluntary basis and shall not receive any remuneration for their work within the Committee.

### 3.4. Stakeholders

The **Stakeholders** may be part of the Sector Committees through the mechanisms described in these Instructions with the objective of actively participating in the adequate development of the Product Category Rules within the Program.

### 3.5. Verifiers

The Program **Verifier** is the Environmental Footprint Institute, which will carry out the verification tasks through individual verifiers, through its own staff or external staff.

The Secretariat and the Technical Committee shall be responsible for qualifying individuals or external entities as authorized verifiers of the EFI Program.

Candidates for external verifier shall submit their curriculum vitae to the Environmental Footprint Institute, proving their training in the field of life cycle assessment and its reference ISO standards, knowledge of ISO 14020, ISO 14025 and ISO/TS 14071, and previous work as an expert consultant or verifier of environmental declarations or life cycle assessments.



Either the Secretariat or the Technical Committee may request a personal interview with the candidate before making a decision on the candidate's qualification as an authorized external verifier.

The tasks of the verifier are to verify the correct performance of the LCA from which the Environmental Declaration has been developed, including a verification of the data collection and processing system and the suitability of the decisions taken during the assessment, to ensure suitable compliance with the Program Instructions, and to issue a report on the results of the verification, which may be favorable or unfavorable.

The verifying individual may not have any economic dependence or relationship with the declarant, nor have participated in the performance of the Life Cycle Assessment.

### **3.6. Declarant**

The Declarant is the individual or organization that prepares and submits an Environmental Product Declaration under the Program, and may use the Program's label as provided for in the Program once it has registered each Environmental Product Declaration.

In order for the Declarant to register its Environmental Declaration in the Program and use the Label awarded by the Environmental Footprint Institute, it must expressly accept each and every one of the points of the Program and its Instructions, including:

- Allow verifiers and the Environmental Footprint Institute access, within the terms of confidentiality, to the activity data used to perform Life Cycle Assessments.
- Fulfill the requirements for the use of the Label granted by the Environmental Footprint Institute.
- Use the Registered Environmental Statement only during its validity period.
- Inform the Environmental Footprint Institute if changes have been made in its production processes that could alter the results of the registered Declaration while it is within the period of effectiveness.

To be responsible for the payment of the Program's registration, verification and/or maintenance fees.

It is the Declarant's responsibility to fulfill the regulations of their country and/or place of application of the legislation they must fulfill, in addition to what is described in these Instructions.

### 3.7. General Public

The results of the Environmental Declarations arising within the scope of the Program will be available to the **General Public**, considering this as any person (natural or legal), group, organization or entity of any kind and any location that has an interest in knowing the results.

### 3.8. Transparency and external involvement

Transparency is a fundamental pillar of the EFI Program. Therefore, the Environmental Declarations registered in the program are public and accessible both from the digital media of the Environmental Footprint Institute, such as its website, as well as by express request through the means of contact available and published on the Institute's website. Likewise, the Product Category Rules are also available to interested stakeholders, who may participate in their preparation as described in the Program Instructions.

The General Public is able to contact the Environmental Footprint Institute to request information about the operation of the Environmental Footprint Institute, submit inquiries, comments or complaints about either the operation of the Program or published Environmental Footprint Declarations or Product Category Rules. All complaints or claims sent to the Environmental Footprint Institute should include a clear description of the scope and nature of the complaint or claim, should not be anonymous, and should include the necessary references to the Program Instructions, ISO 14025 or any other methodology, standard or reference document on which the complaint or claim is based.

The Footprint Institute, through the Program Secretariat, will respond to complaints and claims as soon as possible. If necessary, based on these complaints and claims, corrective actions may be taken to solve the identified issues, including withdrawing published Declarations, modifying Category Rules or planning revisions to the Program Instructions themselves.

## **4. PRODUCT CATEGORY RULE DEFINITION PROCESS**

### **4.1. General Considerations**

As defined in ISO 14025, Product Category Rules (PCR) are a set of specific rules, requirements and guidelines for the development of Type III environmental declarations for one or more product categories, which are understood as groups of different products, but with comparable intended use and functional characteristics.

Each Product Category Rule is a document that expands on the requirements of the program and details certain aspects of carrying out the Life Cycle Assessment of the product of a specific sector, such as calculation rules, scope or content of the Declaration to be developed. Category Rules improve comparability between products of the same category.

For the development and publication of any Environmental Product Declaration such as those developed within the EFI Program, it is essential to follow the Program Instructions, ISO 14040 and ISO 14044, as well as the specific instructions described in the Product Category Rule corresponding to the nature of the declared product.

As a general rule, and barring the exceptions included in the Program Instructions, the development of new Product Category Rules within the Program shall be performed following the specifications of ISO/TS 14027:2017 or such ISO standard that may replace it.

PCRs may be developed in Spanish or English.

The Environmental Footprint Institute will be the owner of each PCR developed under this program and will ensure that the PCRs will be monitored and made available to any interested party for the duration of the program.

## **4.2. Compatibility and Prevalence**

The EFI Program supports the use of Product Category Rules developed outside the program and which are compatible with it. Prior to the development of a new Category Rule, the Secretariat and the Technical Committee shall verify the existence of an equivalent Category Rule in other systems according to the following order of prevalence:

- Internationally recognized industry standards or requirements that act in practice as Category Rules, such as UNE-EN 15804 or ISO 21930.
- European Commission Environmental Footprint Program Category Rules (ECEFPCRs).
- Category Rules for other mutually recognized Environmental Claims Programs together with the Environmental Footprint Institute.

However, new PCRs may be developed to complement the existing ones in order to detail specific aspects of certain sectors.

## **4.3. General procedure**

Based on what is detailed in the ISO/TS 14027 technical standard, the development of a new PCR will include at least the following phases:

- Request for a new PCR
- Convening of the Sector Committee
- Development
- Public consultation
- Publication or rejection

### 4.3.1. Request for a new PCR

Any interested party may request the creation of a new PCR when it considers that a suitable one does not exist for the product for which an Environmental Declaration is to be developed.

To request the development of a new PCR, the applicant should contact the Program Secretariat through the means of contact published on the Program's web site or other means indicating:

- Description of the Product Category to be Covered
- UN CPC product code
- Motivation
- Proposal of Technical Responsible for the development of PCR

Only applications that include the proposal to prepare at least one Environmental Declaration according to the new PCR to be developed will be accepted.

The applicant may be the Environmental Footprint Institute itself.

Once the application is received, the Secretariat, the Technical Committee and the applicant will verify that there is not an existing PCR according to the prevalence rules of the Program Instructions. In case there is no existing PCR and the above requirements are met, the development of the PCR will be initiated by appointing a Technical Manager, as described in the Program Instructions (section 3).

### 4.3.2. Convening of the Sector Committee

The Technical Manager will be initially responsible for convening a Sector Committee as described in the Program Instructions (section 3). To call for a new committee, the Technical Committee and the Program Secretariat will collaborate in appointing a Coordinator and support the request for stakeholder participation. The deadlines for the development of the PCR will start from the formalization of the Sector Committee.

Once the Sector Committee has been set up, the general public will be informed of the start of the development of a new Product Category Rule, as well as the expected deadlines, necessary contact details and the means of participation open during the consultation phase.

### 4.3.3. Development

As with the rest of the program, the development of PCRs shall meet the requirements of ISO 14025 and ISO/TS 14027 specifications, in the most recent version available at the time of the PCR review.

In order to initiate the development of a PCR, it is necessary to previously fulfill the provisions of the previous sections of these Instructions, specifically with regard to the request for a new PCR, the appointment of a Technical Manager and Coordinator and the convening of the Sectorial Committee.

The Coordinator will initially establish:

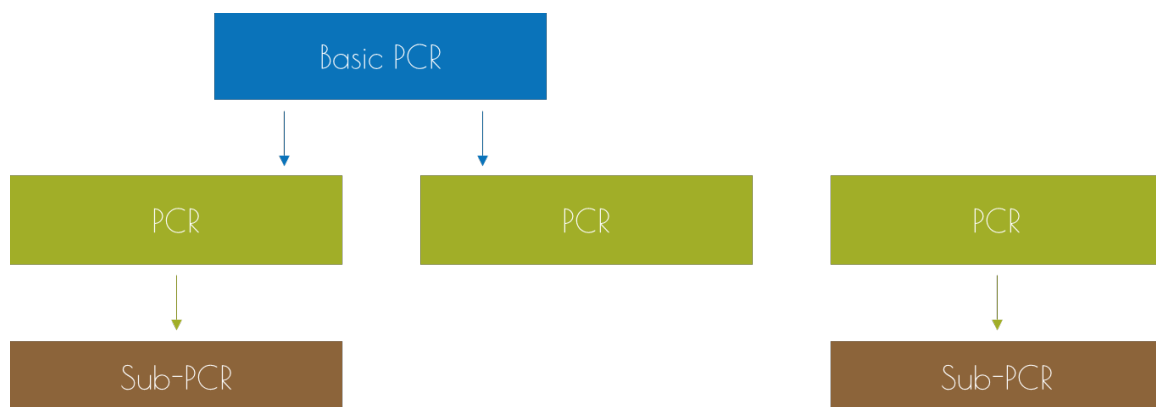
- Expected timeframes for the development of PCR
- Means of communication and participation of the different members of the Technical Committee, the Technical Manager and the Coordinator. These means may be face-to-face or on-line, but they must allow all members to participate on an equal basis.

The new PCRs shall be based on the application of the ISO 14040 and ISO 14044 standards on life cycle assessment, including any additional requirements considered necessary by the Sector Committee for the category. The new PCRs may add requirements, define scopes, boundaries, allocation rules, phases, data sources, etc., as long as these requirements do not contradict what is described in the applicable ISO standards (ISO 14025, ISO/TS 14027, ISO 14040 and ISO 14044).

Product Category Rules may be of the following types:

- Product Category Rule: General PCR, referring to a specific product category.

- Product Category Basic Rule: Document referring to a group of similar categories, and defining the General Rules to be followed by PCRs for specific categories within the common group. The Basic Rules may not be used to create Environmental Declarations, their purpose is to serve as a basis for creating new PCRs, maintaining consistency between similar categories. The development of a general PCR does not require the existence of a Basic Rule.
- Product Category Sub-Rule: A PCR for a product category or subcategory that details specific issues for a product category included in a PCR. Sub-PCRs do not incorporate all the information required to develop an Environmental Declaration, so they should be used in combination with the PCR from which they are derived. All Sub-PCRs shall clearly indicate the PCR from which they are derived.



*Figure 2 - Diagram of relationships between PCR typologies*

In addition to the provisions of ISO 14025 and ISO/TS 14027, PCRs may include additional information such as:

- Recommended computer support tools (in no case mandatory).
- Databases for default values or specific default values.
- Prevalent information sources.

- Impacts and impact assessment methods to be used for the declaration.
- Additional information to be included in the declaration in a mandatory or optional way, as well as the evaluation and reporting methods in case this additional information is considered to be of an environmental nature.

The PCR should include all environmental impacts and additional information that are relevant to the product category, based on related literature, technical studies and other proven technical and/or scientific sources of information, but also taking into consideration social demand for information on certain impacts. The PCR should include information justifying the selection of impacts and additional environmental information.

Work on the development of a PCR will be formalized in a public draft document.

Both the Secretariat and the Technical Committee shall review the quality of the draft of each PCR. If they consider that the draft is not of sufficient quality, it will be returned to the Sector Committee for revision. Once the quality of the draft has been validated by the Secretariat and the Technical Committee, the document will go out for public consultation prior to publication.

#### 4.3.4. Public consultation

The draft PCR document shall be made available to the public for review, sharing and transparency of the process. The Coordinator will be responsible for the materialization of the public consultation.

The public consultation will have two scopes:

- Open consultation: The draft document will be available for the general public through the digital media of the Environmental Footprint Institute. Any interested person or entity should be able to access the document and send comments on it to the Sector



Committee. Comments can be sent through a predetermined form accessible through the Program's digital media, or by direct communication with the Environmental Footprint Institute. The Secretariat will be responsible for forwarding to the Sector Committee the direct communications received within the open consultation period. The Open Consultation is a mandatory process prior to the publication of the PCR.

- Sector Consultation: The Sector Committee and Technical Committee may invite interested parties from the PCR sector to review the draft prior to public consultation. The Secretariat shall approve invitations to the sector consultation to ensure that there is no bias and that the sector is adequately represented. Sector consultation is optional in the process.

The coordinator will keep a record of the comments received and their resolution during the process.

The consultation process must be open for at least 14 calendar days before proceeding with the review of the draft.

Once the consultation process is completed, the Sector Committee will have a minimum of 7 calendar days to respond to all comments received during the process. Once the consultations have been solved, the Sector Committee will prepare a final draft, which will be sent to the Technical Committee for validation and publication, or for rejection.

#### 4.3.5. Publication or rejection

The EFI Program Technical Committee shall review the final draft to ensure that all requirements of the relevant international standards and Program Instructions are met and that the process has been transparent and representative. If any member of the Technical Committee has participated in the Sector Committee, they may not participate in the validation process.

In the case that the Technical Committee gives a negative evaluation of the final draft, it will be rejected and the entire process will have to be restarted.

In the case that the Technical Committee gives a positive assessment of the final draft, it will be validated and the final document will be generated and made available to the general public.

The final PCR will be freely accessible through the program's digital media or by direct request through the contact channels opened by the EFI Program and the Environmental Footprint Institute.

Once the validity period of the PCR has expired, it may continue to be available to the public, but clearly indicating that it cannot be used to develop new Environmental Declarations within the program.

The validity period of the PCRs is 5 years from their publication. All PCRs may be updated during or after their validity period. The process of revising a PCR is the same as that of creating a new one, but with the original PCR as a basis, which may be partially reused when the changes in the update are minor.

## **5. ENVIRONMENTAL DECLARATION DEVELOPMENT PROCESS**

The development of an Environmental Declaration within the EFI Program involves the following steps:

- Development of a product life cycle assessment in agreement with ISO 14040 and ISO 14044 standards as described in the corresponding PCR.
- Drafting of the Environmental Declaration as described in the PCR.
- Declaration Verification.
- Program registration and Publication.

The EFI Program does not admit the development of Environmental Declarations that are not publicly available through the Program's website.

## 5.1. Development of the Life Cycle Assessment

The objective of an Environmental Declaration within the EFI Program is to evaluate and publicly display, in a transparent and verified way, the environmental performance of a product or service throughout its life cycle, with two possible scopes: **from cradle to gate** (from the obtaining of raw materials until the finished product leaves the manufacturer's facilities), or **from cradle to grave** (it includes the complete life cycle, i.e. cradle-to-gate scope plus all downstream processes, including end-of-life and recovery, reuse or recycling of the product and its complements). Additionally, it is possible to develop Environmental Declarations in a **cradle-to-gate scope with options**, which would correspond to a cradle-to-gate scope to which phases of particular environmental, operational or functional relevance are added, provided that this is permitted by the relevant PCR.

The Life Cycle Assessment should be carried out according to everything described in ISO 14040 and ISO 14044 and the corresponding PCR, in addition to following the EFI Program Instructions.

Therefore, the first step in developing the Life Cycle Assessment is to select the appropriate PCR from those available in the EFI Program. The Technical Committee should advise anyone interested in developing an Environmental Declaration within the EFI Program in selecting the most appropriate PCR for the product or service for which the Environmental Declaration will be developed.

In the case that a suitable PCR does not exist, the Technical Committee will encourage the interested party to develop a PCR simultaneously with the development of the Life Cycle Assessment of the product or service and the drafting of the Environmental Statement. If the Environmental Declaration is finished before the publication of the corresponding PCR,

the Environmental Declaration will not be verified and will be published with the status "**Pending verification**" clearly indicated in the Declaration.

An Environmental Declaration cannot remain in "Pending Verification" status for more than one year after its publication. Within this period, the corresponding PCR must be completed, and the final verification of the Declaration must be carried out. The validity of the Declaration since its definitive publication will be the one described by default in the Program Instructions or the PCR, subtracting the time it remained in "Pending verification" status. If, after one year from the initial publication, the Declaration is not verified, either because the PCR is not published or for any other reason, the Declaration process must be started again, and the Declaration will be withdrawn from the Program.

The Life Cycle Assessment shall be performed by the interested party or a third party. The Environmental Footprint Institute will not be able to participate in the making of Life Cycle Assessments formalized in an Environmental Declaration within the Program.

## **5.2. Drafting of the Environmental Declaration**

The results of the Life Cycle Assessment, as well as all additional information required by the Product Category Rule, shall be described in a document in conformity with the EFI Program Instructions and the corresponding PCR.

The Environmental Declaration shall be written in Spanish or English, in a free format, as long as all the information described in the corresponding PCR is included, the information is clear, and there is no confusion as to its purpose, its interpretation and the role of the declarant, the EFI Program and the Environmental Footprint Institute. The Secretariat and the Technical Committee may reject any Declaration that is considered not to meet these criteria.

The Environmental Declaration must be drafted by the interested party or a third party. The Environmental Footprint Institute may not participate in the drafting of an Environmental Declaration within the Program, although it may resolve queries through its secretariat or technical committee.

### 5.3. Multiple products or services in one Environmental Product Declaration

Each Environmental Product Declaration shall refer to a product or service clearly specified within the declaration document, including its commercial name, functionality, description and technical characteristics.

It is possible to include several products within one environmental declaration, in one of the following two ways:

- Sectoral Environmental Declaration: An Environmental Declaration involving different manufacturers within a common geographical area and referring to a product with similar functionality and technical characteristics. In this type of declaration, the activity data used as a source to develop the intrinsic life cycle analysis will come from each of the manufacturers participating in the declaration, and the results of the declared environmental impacts will be a single set of results indicating the weighted average in production of each manufacturer according to the declared unit. In this type of Declaration, the maximum variation between the analysed products of the different manufacturers must be indicated in percentage ( $\pm X\%$ ), of at least the total GWP100a impact, although it is recommended to indicate this variation for all the impacts and results included in the declaration. This type of declaration must clearly include in the declaration, preferably on the cover page, that it is a Sectoral Declaration.
- Product Group Environmental Declaration: An Environmental Declaration for a set of similar products manufactured by a single manufacturer. Similar products are understood to be products with the same function and a similar production process between them. The declaration will include a single set of results, which will be reported in a unit applicable to all products (e.g. per tonne, per m<sup>2</sup>, etc.), and will represent the production-weighted average of functional or declared units for all products included in the

declaration. In this type of Declaration, the maximum variation between the analysed products from the different manufacturers, of at least the total GWP100a impact, must be indicated in percentage ( $\pm X\%$ ), although it is recommended to indicate this variation for all impacts and results included in the declaration. Different products cannot be grouped within the same Declaration if the result represents a variation of  $\pm 10\%$  in the total GWP100a impact, and/or a variation of  $\pm 25\%$  in more than three different GWP100a impacts. Such statements should clearly state on the statement, preferably on the cover page, that the statement covers a group of products.

## 5.4. Partial Environmental Declarations

Within the EFI Program, it is possible to register and publish environmental declarations with a limited set of impacts. These declarations are called Partial Environmental Declarations and can be of the following two types:

- Water Footprint Declaration: The way to develop this type of declaration is similar to that of full environmental declarations but limited to information on the environmental impacts associated with consumption, scarcity, management and impacts on water. These declarations must additionally follow recognized methodologies and standards related to this kind of declarations, such as ISO 14046 or the Water Footprint Network.
- Carbon Footprint Declaration: The way to develop this type of declaration is similar to that of full environmental declaration but limited to information on environmental impacts associated with global warming potential (GWP). These declarations must additionally follow recognized methodologies and standards related to this kind of declarations such as ISO 14067 or GHG Protocol - Product Life Cycle Accounting and Reporting Standard.

## 5.5. Verification

Verification of the Environmental Declaration ensures the validity and veracity, within reasonable limits, of the information included in it.

Within the EFI Program, verification will be carried out by experts selected by the Environmental Footprint Institute, who may be either internal or external verifiers, according to the suitability and selection criteria described in these instructions.

The verifiers must be independent of the reporting person or organization, of the person or organization that has performed the life cycle assessment, and of the person or organization that has drafted the Declaration to be verified. Therefore, the verifier cannot be selected by the declarant and will be proposed by the Environmental Footprint Institute.

The verifier shall report to the Environmental Footprint Institute any pressure received by the declarant or the persons and organizations in charge of developing the Life Cycle Assessment or the Declaration.

The following elements will be verified:

- The definition of the functional or declared unit and the boundaries of the system.
- The activity data used for the calculations, including their origin and traceability.
- Assignment rules, assumptions and estimations made.
- The calculation method used.
- Databases and default values used.
- The implementation of impact methods.
- Additional information included in the declaration.
- Conformity with the requirements of the PCR and the Program Instructions.

The verifier may decide, in the case of declarations with a large volume of data, to carry out a sample verification, always within the requirements of the applicable standards. The verification method shall be detailed in the verification report.

The verification will be based on two pillars:

- **Document review** of the information used for the development of the life cycle assessment and the life cycle declaration.
- **Replication of the LCA**, as a whole or in part, provided that the time and means spent by the verifier for this task are reasonable.

During the verification process, the verifier will check the validity and accuracy of the information contained in the Declaration and its corresponding LCA.

For a satisfactory verification, the declarant must be committed to provide all information requested by the verifier, including visits to production sites and offices of the declarant, provided that they are relevant to verify the Declaration.

At the end of the verification process, the verifier will write a report including his overall favorable or unfavorable validation of the declaration, as well as the steps carried out during the verification process, information on the activity data and documentation reviewed and its management by the declarant, information on the validity and accuracy of the calculation methods used, and the errors, deviations and problems found, if any.

In the case that the verifier finds rectifiable incidents in the LCA and/or the declaration, the declarant may make the appropriate modifications, which must be validated by the verifier. The verifier may inform the declarant of the detected incidences before the final report is drafted, and the corrections shall be reflected in the report.

If the verifier, finally, issues an unfavorable report, the Declaration will not be registered in the Program.

When the verifier issues a favorable report, the Declaration shall be dated with the same date of the verification report. This will be the reference for the validity period of the declaration.



## 5.6. Publication

Once the favorable verification report has been obtained, the following information shall be added to the Declaration document:

- Unique reference code. Assigned by the Secretariat before the final publication.
- Verification date.
- Verifier's signature.
- Validity date of the declaration.

With this information, the Secretariat will publish the Declaration on the program's website and make it available to the public.

Additionally, the declarant will be given the CALCULATED ENVIRONMENTAL FOOTPRINT label, granted by the Environmental Footprint Institute, which must be used as described in the Rules for the use of the Environmental Footprint seal.

## 5.7. Declarations update

Within the validity period, published declarations shall be updated and verified if the processes, raw materials or technology have changed substantially regarding those evaluated in the life cycle assessment that gave rise to the declaration. Substantial variations are considered to be those that result in variations of  $\pm 10\%$  in any environmental impact included in the declaration, or changes in the ownership of the Declaration.

When registering a product in the EFI Program, the declarant is committed to inform the Secretariat when the following changes take place.

If these substantial variations have taken place and the Declaration has not been updated, the Secretariat will remove the Declaration from the website and it will be registered as canceled.

## **5.8. Confidentiality**

Published Declarations may not include data considered confidential by the declarant or third parties. However, the declarant may not rely on confidentiality to hide relevant environmental data that must be included in the Declaration in terms of the PCR and the Program Instructions.

During the verification processes, the verifier may need access to certain confidential data. The verifier shall keep such confidential data at all times, and shall not divulge by any means or retain for further use any confidential data to which it has had access, without the express permission of the owner of the confidential data. In any case, the declarant and the verifier may sign a confidentiality agreement allowing the verification of the declaration to be carried out without disclosing the confidential data. The signing of a confidentiality agreement shall not entail a financial cost for the verifier and/or the Environmental Footprint Institute

## **6. INSTRUCTIONS REVIEW**

The EFI Program Instructions will be reviewed every 5 years, or sooner if the Secretariat or the Technical Committee finds elements that need to be added, deleted or modified.

The general public may contact the Environmental Footprint Institute at any time and by the usual means of communication to suggest modifications to the Instructions. The Secretariat and the Technical Committee should assess the relevance and feasibility of all proposed modifications, and whether there is a need to modify the Instructions before the 5-year period foreseen.

Revisions may not lead to changes in the instructions.

## **7. USE OF THE EFI PROGRAM BRAND AND THE INSTITUTE'S IMAGE ENVIRONMENTAL FOOTPRINT**

The "EFI Program" and "Calculated Environmental Footprint" trademarks and labels of the EFI Program are owned by the Environmental Footprint Institute.

The Environmental Footprint Institute manages and oversees these trademarks and labels, and will sign license agreements with the declarants who have registered their products or services in the EFI Program.

Only the "EFI Program" and "Calculated Environmental Footprint" labels may be used on documents, products and other information authorized by the Environmental Footprint Institute, in fulfillment of what is described in the Program Instructions.

### **7.1. Obtaining the rights to use the labels "Calculated Environmental Footprint", "Calculated Carbon Footprint" and "Calculated Water Footprint"**

Individuals and organizations who wish to use the EFI Program's labels "Calculated Environmental Footprint", "Calculated Carbon Footprint" or "Calculated Water Footprint" must:

1. Have followed the entire process described in the EFI Program instructions up to the satisfactory registration of the corresponding Declaration in the EFI Program.
2. Accept the brand usage rules described in the EFI Program Instructions.
3. Pay the established registration and maintenance fees.

Once these requirements have been met, the Environmental Footprint Institute will grant the Declarant authorization to use the label, according to the conditions of use described in the EFI Program Instructions. This authorization shall remain in effect for the period established in the

Program Instructions for each of the Declarations registered by a Declarant and that remain in effect, and for the Declarant as long as it has at least one Declaration registered in effect, and within the conditions established in these Instructions.



*Figure 3 - CALCULATED ENVIRONMENTAL FOOTPRINT label. Example of use.*

## **7.2. Conditions of use**

The EFI Program's labels can only be used by authorized organizations or individuals, under the specific conditions and in the specific way set forth in such authorization and for authorized products. The specific terms of this authorization will be provided to the licensee after obtaining the right to use the label and will be interpreted in a restrictive way.

Organizations or individuals that have not obtained the "Calculated Environmental Footprint", "Calculated Carbon Footprint" or "Calculated Water Footprint" labels from the EFI Program for any of their products or services are not authorized to use the label, except for a description of the label itself, the EFI Program, or the Environmental Footprint Institute and

provided that the label is visibly accompanied by a text indicating that the organization or individual has not obtained the "Calculated Environmental Footprint", "Calculated Carbon Footprint" or "Calculated Water Footprint" label.

The label may be used in its Spanish or English language version, and shall always be used by licensees in a way that is clearly associated with the name or logo of the organization, individual or product licensee, in such a way that there is no confusion as to the owner and licensee of the label, and accompanied by the reference number to the corresponding Declaration, as shown as an example in Image 3 of these Instructions, and in such a way as to avoid associating the label with products not covered by the Declaration.

The trademark may be used by the licensee on the product, its packaging or associated documentation, in printed or digital media, and in corporate information as long as it is clearly and expressly indicated to which product or service it refers, and in all cases it is recommended to be accompanied by the reference number of the corresponding Declaration.

The person authorized to use the label may not alter the image of the label unless expressly authorized by the Environmental Footprint Institute.

The Environmental Footprint Institute may unilaterally revoke a declarant's authorization to use the label when the corresponding Declaration is not in effect, when the provisions of the Program Instructions are not fulfilled, or when the declarant has misused the label.



*Figure 4 - CALCULATED ENVIRONMENTAL FOOTPRINT label, English version. Example of use.*

## **8. FEES AND FUNDING SOURCES**

The functioning of the EFI Program is possible thanks to the financing through the Environmental Footprint Institute's own funds and the contributions of the declarants through the fee structure for registration and program maintenance.

These fees may be a one-time payment or recurring or periodic payments for maintenance, publication and diffusion of the program and its declarations.

Fees may be invoiced to the declarant, or to the person or organization explicitly indicated by the declarant, the authorization to use the label being granted to the declarant, and not to the invoice receiver in case of being different.

Program fees are available to the general public upon request.

At the time of publication of these instructions, there is no additional funding for the EFI Program.



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