GENERAL PROGRAM INSTRUCTIONS

For Environmental Product Declarations (EPDs)

NSSGA

NATIONAL STONE, SAND & GRAVEL ASSOCIATION

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1. Introduction

1.1. Purpose of the Program

The purpose of the general program (referred to as "Program") instructions is to guide the development, verification, and publishing of Product Category Rules (PCRs) and Type III Environmental Product Declarations (EPDs) by the National Stone, Sand & Gravel Association (NSSGA). These instructions meet the requirements of ISO 14025-2006 *Environmental labels and declarations —Type III environmental declarations —Principles and procedures.*

1.2. Scope and Objectives

The scope of the Program covers the development and administration of PCRs and EPDs and is primarily intended for the North American market. The focus of the Program will be to provide comprehensive, transparent, and verified materials to the Intended Audience as described through the Program consistent with ISO 14025.

The objectives covered by this Program that the program operator will be responsible for are:

- Establishing, maintaining, and publishing all PCRs generated under this Program
- Verifying, updating and publishing all EPDs generated under this Program
- Administering the formation of and work of the PCR Committee for all PCR development and update activities
- Collaborate, when possible, with downstream program operators and PCR Committees
- Establishing the procedure for selecting the PCR Committee interested parties, members and third-party verifiers for both PCRs and EPDs
- Ensure all aspects of the Program and subsequent PCRs and EPDs meet the required Reference Documents (including but not limited to LCAs)
- Monitor for changes in reference standards and procedures related to PCRs and EPDs, and updating the Program or PCR as needed

1.3. Program Operator

The NSSGA was established in 2000 as the trade association responsible for advocating for the aggregates industry. NSSGA is based in Alexandria, VA and is a 501 (c) (6) non-profit organization. Its members – stone, sand and gravel producers and the equipment manufacturers and service providers who support them – produce the essential raw materials found in homes, buildings, roads, bridges and public works projects. NSSGA also provides technical assistance and educational material for members related to best practices within the aggregate industry related to operational efficiencies, environmental stewardship, and community outreach. NSSGA represents more than 90 percent of the crushed stone and 70 percent of the sand and gravel produced annually in the United States. As the Program

Operator, NSSGA will maintain and adhere to all requirements set forth within these general program instructions.

1.4. Intended Audience

The intended audience of this Program is business-to-business (B2B) and business-to-consumer (B2C). Typical examples of B2B audience members include professional, commercial, or procurement stakeholders, especially in downstream material products (concrete, asphalt mixtures, etc.). B2C audiences may also apply to the program as EPDs developed under the program can be made available to the general public for purchasing decisions or use. EPDs developed for B2C audiences should meet the additional requirements of ISO 14025 Clause 9.

PCRs developed under the Program shall clearly identify the intended audience and the corresponding verification process in accordance with ISO 14025.

2. Definitions, References and Key Concepts

2.1. Product Category

Product categories are groups of products that may fulfill similar or equivalent functions. All PCRs shall, when possible, use recognized naming conventions such as UNSPSC (United National Standard Products and Service Code), UNCPC (United Nations Central Product Classification System), or NAICS (North American Industry Classification System). All PCRs shall define the appropriate product category within the Scope of the PCR.

2.2. Key Terms

Key terms used throughout this program are identified and described below:

- Environmental product declaration (Type III environmental declaration): quantification of environmental data and impacts for the life cycle of a product using predetermined parameters. Environmental product declarations are comprehensive, transparent, and independently verified disclosures.
- Life cycle assessment: the compilation, quantification, and analysis of the potential environmental impacts of a product, based on the inputs and outputs throughout the life cycle of the product.
- Life cycle inventory: the stage of the life cycle assessment that captures the necessary inputs and outputs associated with the product life cycle.
- Life cycle impact assessment: the phase of a life cycle assessment that evaluates the magnitude and significance of potential environmental impacts of a product system throughout its entire life cycle, from raw material acquisition to final disposal

- Product category rule: a verified set of requirements and guidelines for developing EPDs for one or more product categories
- Program operator: the organization or body that oversees the PCR development, update, and verification process.

2.3. References

The Program and NSSGA will refer to and meet the requirements, when necessary, of the following standards:

- ISO 14020 *Environmental labels and declarations—General principles*
- ISO 14025:2006 *Environmental labels and declarations —Type III environmental declarations —Principles and procedures*
- ISO 14040 *Environmental management—Life cycle assessment—Principles and framework*
- ISO 14044 *Environmental management—Life cycle assessment—Requirements and guidelines*
- ISO 21930:2017 *Sustainability in building construction — Environmental declaration of building products*
- ACLCA 2022 *PCR Guidance— Process and Method Toolkit*
- *ACLCA 2022 Guidance for Assessing Data Quality of Background Life Cycle Inventory (LCI) Datasets*
- U.S. EPA *Criteria for Product Category Rules (PCRs) to Support the Label Program for Low Embodied Carbon Construction Materials (EPA's PCR Criteria)*

3. Program Governance

3.1. Roles and Responsibilities of the Program Operator

The program operator (NSSGA) will be responsible for meeting all of the objectives set forth in the Program (see Section 1.2). In addition, the program operator will be the technical point of contact for questions, updates, and comments regarding the Program and PCRs developed under the program. The program operator will act as an independent facilitator and administer the Program (including PCR development, PCR Committee selection, and updates) with the best science-based approaches and practices, while also considering industry experiences and expertise. The program operator will have no voting power or decision-making power within the PCR Committee and serve in an advisory and administrative capacity only.

3.2. Transparency and Impartiality Considerations

For the Program and PCRs developed under the Program, transparency is essential to ensure that EPDs can be correctly interpreted by any interested party. The program operator (NSSGA) is responsible for ensuring transparency in the Program and for making the general program instructions available. Transparent procedures are required for the definition of product categories and for PCR review. The intent of all PCRs developed under the Program is that all are open, transparent, and developed using a collaborative process, involving interested parties through consultation. The program operator ensures the PCR development remains impartial, organized, and meets the requirements of relevant standards.

All interested parties serving in various capacities within the Program (PCR Committee, PCR Review Panel, EPD verifier, etc.) are to conduct business ethically and without conflicts of interest. Impartiality is critical to the long-term success of the Program and as best possible, be moderated by the program operator.

3.3. Decision-Making Procedures

The decision-making process within the Program should be consensus-based, and rely on the best available science, while reflecting practical realities and industry needs.

4. Development of Product Category Rules (PCRs)

4.1. Process for Developing PCRs

PCRs covered by the Program will be developed under the following steps and procedures in accordance with ISO 14025 and ACLCA (American Center for Life Cycle Assessment) *2022 PCR Guidance.* PCRs developed under the Program will have the option of using ISO 21930 as the default Part A or, if needed, develop a unique Part A based on ISO 21930. Part B of PCRs developed under the Program should be specific to the product category and note which Part A option is to be followed and any other deviations from ISO 21930. It is important to note that, while other interested parties are involved in the PCR development process, EPDs can only be developed by respective producers and manufacturers of the product category.

4.1.1. Determination of Need

The need to develop a new PCR for a specific product category or to provide necessary updates to the existing PCR can be made by any interested party. These requests should come to the program operator (NSSGA) and can come from any interested party (ex. industry, academia, downstream program operators, etc.). Previous or standing PCR Committee may be consulted to consider if the determination of need is met.

4.1.2. Review of Existing PCRs

If the interested party is requesting a new PCR be developed, the program operator and the PCR Committee will review existing PCRs to determine if a readily available PCR already exists

within the same product category. Existing PCRs that need to be modified can be done in collaboration with the existing program operator, in accordance with ISO 14025 Clause 6.7.1. If no existing PCRs are found, a new PCR shall be developed.

4.1.3. Formation of the PCR Committee

The program operator will establish/maintain the PCR Committee, a formal group of interested parties. The PCR Committee will be responsible for developing or revising the PCR content, with the program operator serving as the administrator of the Committee

4.1.4. Collection of Background Information

The PCR development process shall include at least one underlying or reference LCA, conducted in accordance with the ISO 14040/44 standards, to provide information to the PCR Committee regarding model assumptions, life cycle inventories, data gaps, additional environmental information, and other factors that should be included in the PCR. At least one LCA used for underlying discussions with the Committee may need to be critically reviewed by an independent third-party.

4.1.5. Develop PCR Content

The PCR Committee is responsible for developing the content of the PCR and drafting all specific rules, requirements, and guidelines. For construction materials, all PCR Content should meet the requirements of ISO 21930 (whether as the default Part A or a unique Part A based on 21930), as well as consider the ACLCA (American Center for Life Cycle Assessment) *2022 PCR Guidance* and U.S. EPA *Criteria for Product Category Rules (PCRs) to Support the Label Program for Low Embodied Carbon Construction Materials (EPA's PCR Criteria)* documents for adoption of best practices. When possible, the PCR Committee will make efforts to harmonize the PCR with up and downstream product categories' PCRs.

4.1.6. Public Comment Period

The PCR draft shall be made available for public comment and solicited to interested parties by the program operator. The length of the public comment period shall be at least 30 days but can be extended as determined by the program operator and the PCR Committee prior to solicitation. All returned comments must be considered by the program operator and PCR Committee Chair to bring forward for Committee consideration.

4.1.7. PCR Review and Verification

PCR review and verification can be done in parallel with the public comment period, however any major changes brought forth by the public comment period may require additional review by the PCR Review Panel. The PCR Review Panel will review and verify that the draft PCR meets

all ISO 14040, ISO 14025, and ISO 21930 requirements. The results and comments of this review should be considered for the final version of the PCR. The sign off of the final version of the PCR, when returned by the PCR Review Panel, shall be signed off by the PCR Committee to ensure industry compliance and support.

4.1.8. Publication

Following the PCR Review Panel review and verification, the PCR document will be published by the program operator on the NSSGA website. Any differences between updated and previous versions of the PCR shall be listed on the NSSGA website as a summary of changes.

All related documents as part of the PCR development and review process, including but not limited to reference LCA, LCA review letter, public comments and responses, and third-part review feedback will also be published to ensure transparency in the Program.

4.1.9. Maintenance and Renewal

The PCR will be maintained by the program operator and mid-cycle (prior to the period of validity ending) updates can be requested by an interested party at any time. Renewal of an existing PCR shall fall under the period of validity (five years) for the PCR. Note, an extension of one year may be allowed. Any proposed changes to the PCR or its' Appendixes that change how the document is interpreted or implemented must follow the standard PCR development process.

Minor changes, editorial in nature can be made without involvement of the PCR Committee, pending approval by the PCR Review Panel. These maintenance-related items include misspellings, formatting changes, or other changes that do not change how the PCR is interpreted or implemented.

4.2. Period of Validity

PCRs developed under the Program shall be valid for a period not to exceed five years. Prior to the expiration of the PCR, the PCR Committee will be formed/reformed to review the document for any necessary revisions. The program operator (NSSGA) will oversee for the formation or reconvening of the PCR Committee. During the review process, if necessary, the PCR may be extended for an additional year.

Validity of EPDs developed under PCRs within the Program should mirror the period of validity of the PCR. Any deviation of the period of validity shall be disclosed within the individual EPD.

Considerations to update the PCR can be made by the PCR Committee at any time and can be initiated by either the program operator or by an interested party if relevant information is provided.

4.3. Interested Parties

The PCR development process described in the Program shall be open to all interested parties (ex. industry, academia, downstream program operators, etc.). The program operator will solicit involvement of interested parties for the PCR Committee membership and for the required public comment period. Interest parties may include, but not be limited to, producers, consumers, consultants, federal and state-level agency personnel, LCA practitioners/experts, non-government organizations, and academic or research institutions. Membership of the PCR Committee will require an application to be submitted by all interested parties.

4.4. PCR Committee Criteria

The PCR Committee will be selected by the program operator based on the qualifications of the applicants. All PCR Committee activities shall be conducted under NSSGA's anti-trust policy. The PCR Committee shall be directed by the Committee Chair who shall be nominated by and approved by the Committee. The Committee Chair will be responsible for working with NSSGA to develop meeting agendas, meeting minutes, and administering the meeting's proceedings. All official Committee activities (call to order, approval of agenda, approval of minutes, PCR guidance decisions, and meeting adjournment) require a simple majority vote. 50% of the voting Committee roster must be present for quorum, and voting can be done virtually using polls. Non-voting status can be issued to certain interested parties as needed and determined by the program operator and/or PCR Committee Chair.

The program operator will provide administration support to the PCR Committee meetings and activities but not hold a vote. No more than one vote may be held by a single organization or company and the make up of the committee should strive to meet the following categories and balances (see below). At least one member shall be comprised of each Committee Roster Category.

Committee Roster Category	**Approximate Percentage of Committee (%)**
Industry*	40
User	20
LCA Consultants	10
General Interest	10
Academia/ NGO	10
Agency	10

*Must be in good standing with the National Stone, Sand & Gravel Association.

Subcommittees may be necessary during the PCR Committee process and will require a Subcommittee Chair to be nominated and approved by the subcommittee. After the

completion and publication of the PCR, the PCR Committee will be required to remain in standing to resolve determination of needs, updates, and required mid-cycle reviews.

5. Data Collection & LCA Methodology

5.1. Guidance for Life Cycle Inventory Data

The data collection process and LCA methodology will be outlined within the PCR document. The PCR Committee should utilize the underlying ISO 14040/14044 compliant LCAs to evaluate the typical life cycle inventory of the product category and make recommendations. Factors to consider include, but are not limited to:

- A listing of unit processes within the system boundary (ex. extraction, transport, processing, etc.)
- All flows of material and energy that enter the system boundary and all product, co-product and waste flows that exit the system boundary Characterization of all flows between unit processes in the system boundary with application of mass and energy balance as appropriate.
- All background and generic LCI used (from both public and private data sources)

5.2. Predetermine parameters

The PCR Committee will use the underlying ISO 14040 compliant LCAs conducted as background information to assist in assigning the predetermined parameters for the PCR. The specific environmental information may include, but not be limited to:

- Terms and definitions relevant to the product category
- Goal, scope, functional units, and system boundaries for EPDs
- Exclusion and inclusion criteria
- Period of validity for inventory data
- Recommending prescriptive datasets for background data
- Specification of foreground data with an established data collection protocol
- Defining data quality thresholds and data gaps
- Allocation of co-products and waste
- Impact assessment methods to be used
- Impact category results

5.3. Data Confidentiality

As practical and possible, the program operator (NSSGA) will consider all provided primary data as confidential, unless explicitly stated by the provider. If required, NSSGA will participate in a

confidentiality agreement with the provider to secure information relevant to the PCR development activities. All information will be stored in electronic form only and will be deleted upon the request of the provider.

5.4. Standards for Data Quality and Consistency

Data quality methodology and thresholds shall be specified for secondary/background data within PCRs under the Program. The PCR Committee should consider and make recommendations on the best practices (see ACLCA *2022 Guidance for Assessing Data Quality of Background Life Cycle Inventory (LCI) Datasets)* and industry limitations to provide quality and consistent data to LCAs conducted under ISO 14040 and 14044. Data factors to consider include, but are not limited to:

- Time period of the data collection
- Geographical considerations
- Precision of the reporting data
- Completeness of the input streams and corresponding data sources
- Representation across the product category
- Reproducibility of the data sources
- Accessibility to public and private data sources
- Uncertainty in the data sources

6. Verification & Certification Process PCR and EPD

6.1. PCR Third-Party Verification Requirements

The PCR developed by the PCR Committee under the Program must be reviewed by a third-party, independent panel. The PCR Review Panel should be made up of at least three members and include at least one certified professional LCA practitioner (or equivalent expertise) and at least one industry expert. The PCR Review Panel members may not be PCR Committee members or interested parties that participated in the PCR development process. The Review Panel will review the PCR to ensure that all requirements from ISO 14040, ISO 14025, and ISO 21930 are met, and that the general program instruction were followed. All reviewed components of the PCR and comments from the Panel shall be documented and provided to the PCR Committee.

The reference LCA used to inform the PCR development process should also be reviewed by the PCR Review Panel, along with documents and methodology related to the LCA. The model provided to the PCR Review Panel should reflect the requirements of the PCR and relevant and referenced standards.

If a pre-verified tool, web-based application, or other automated EPD s being used, the PCR Review Panel shall ensure that the underlying LCA model directly reflect the PCR. All LCA models included in any pre-verification process should include documentation of all variables and relationships and ensure results conform to the PCR.

6.2. EPD Third-Party Verification Requirements

EPDs developed under the Program shall be reviewed by an external verifier in accordance with ISO 14025 Clause 8.1.3. The external verifier shall not have participated in either the LCA or EPD being verified, but may be a member of the PCR Review Panel. Verification will ensure that the EPD developed meets all ISO 14025 requirements, specially those in Clause 8, and that requirements set forth by the Program and the PCR are also met. All reviewed components of the EPD and comments from the external verifier shall be documented. This verification report shall be made available upon request.

For EPDs developed for business-to-consumer communication, third-party verification is required in accordance with ISO 14025. However, some EPDs may within a business-to-business context, where third-party verification is not mandatory. Instead, independent verification – either internal or external – is required.

For a pre-verified tool, web-based application, or other automated EPD products, the third-party verification requirements and procedures shall also be followed. The external verifier should work with the PCR Review Panel to ensure the LCA model being used by the tool has also been verified. The verifier will be responsible for, and can collaborate with the software developer, testing the tool to confirm the software returns the same outputs for a given set of inputs that would be expected of the model. The verifier can also develop additional sets of input checks to catch any errors in the code. Any errors, or outputs from the tool not that do not conform with the PCR/LCA model will result in failure of pre-verification of the tool.

7. Communication & Publication

7.1. Format and Presentation of EPDs

It will be the responsibility of the program operator to publish verified EPDs and relevant PCR documents related to the program. The publication of EPDs on a public platforms shall be determined by specific PCR guidance and the option to be made available upon request can be used if determined appropriate by the PCR Committee. The format of the EPDs can be determined by the individual organization preparing the EPD, as either “hard copy” (ex. .pdf) or digital format (ex. OpenEPD). Any specific EPD formatting and data structure requirements should be covered by the PCR. The program operator should make attempts, when possible, to harmonize EPD formats to the acceptable format of downstream EPD development.

All EPDs developed under this program will include the NSSGA logo and address on the cover page, but not on the individual product page of the EPD. The product page is defined as the portion of the EPD that is unique to the product and facility for which the EPD is communicating relevant data. NSSGA reserves any and all rights it may have to initiate legal action in the event of, or to prevent, any misuse or misrepresentation of the NSSGA logo.

7.2. Requirements for Transparency and Accessibility

The program operator (NSSGA) will be responsible for making all documents relevant to the Program publicly available for review and reference. This is includes, but is not limited to: the General Program Instructions, the Product Category Rules, and explanatory material. Examples of some explanatory materials include underlying/reference LCA reports, public comments and responses from public review periods, comments and responses from PCR Review Panel, industry benchmarking reports and industry average EPDs.

Transparent procedures are to be established and maintained by NSSGA and will cover, but not be limited to, the PCR Review process, independent verification process, data management process including how confidential data is managed, and comments/results from interested parties. These procedures will be publicly available and all communications relevant to the Program and interested parties will be made available upon request.

All verified EPDs will be published by NSSGA in accordance to the PCR's guidance on public availability. No EPDs will be published by the program operator (NSSGA) if the verification report and supporting data are found to be inadequate of the Program and ISO 21930.

8. Program Maintenance & Continuous Improvement

8.1. Periodic GPI Review and Updates

The general program instructions will be reviewed and updated by the program operator (NSSGA) at least once every five years. NSSGA may, or not, include interested parties, other program operators, similar stakeholders, or other third-party experts in the Program's review and revision process.

8.2. Program Fees/Funding Sources

The Program is operated through a combination of funding through NSSGA's operating budget and fees from the Program. Program fees maybe be variable and, when possible, will be publicly available and updated on NSSGA's website. NSSGA may also seek funding opportunities from outside sources.

8.3. Feedback Mechanism for Stakeholders

Interested parties and stakeholders can provide feedback on the Program and PCRs developed under the Program at any time. Feedback forms should be made available on the NSSGA website, but can also be made directly via email to NSSGA staff.

8.4. Innovation and Adaptation to Emerging Standards

The program operator will be responsible for participating, where possible, in the development of relevant standards, guidelines, and other PCRs. NSSGA will provide the best practices and updates of these relevant documents to the PCR Committee for consideration during the development process or update.