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Procedure for the development and adoption of PSRs – Product Specific Rules

Extending the "**PCR - Product Category Rules**" reference document to specific product families may involve the definition of additional requirements called "PSR - Product Specific Rules". These sector-based application rules are intended to supplement or specify, where necessary, for a given family of products, the common PEP ecopassport® Program rules laid down in the "**PCR - Product Category Rules**".

In conformance with the ISO 14025:2006 standard, the process used to develop the "**PCR - Product Category Rules**" and therefore the new PSRs, includes participatory consultation that is open to all interested parties: e.g.: professional organisations, companies, users, and institutions, within the framework of the PEP ecopassport® Program.

This document defines the "PSR – Product Specific Rules" development and adoption procedure and sets the guidelines for making them easier to compile and ensuring that they are consistent. The full procedure is explained in detail in the step-by-step logic diagram in section 3 of this document.

1. PSR development and adoption procedures

Phase 1: Suitability and feasibility study

Any professional organisation or interested company - hereinafter called the "interested organisation" - that may be interested in creating a PSR or wishes to become involved in the initiative to extend the scope of the PCR and create a PSR should submit its project to the General Secretary of the P.E.P. Association.

- The interested organisation explains its reasons, the scope of the products involved and the resources it intends to use.
- The Technical Committee decides whether the project is suitable and feasible on the basis of the Program Instructions and by checking that their scope of application is consistent with the PCR - common rules and existing PSRs.
- The Technical Committee's opinion is submitted for approval by the Steering Committee which determines the action to be taken in response to the request from the interested organisation.



Phase 2: PSR project creation

After the Steering Committee has given its approval, the interested organisation draws up its new PSR proposal and keeps the Technical Committee informed about how its work is progressing, according to a timetable agreed between the parties.

When the PSR proposal is finalised, it is submitted by the interested professional organisation for the prior approval of the Technical Committee, which asks for the opinion of any interested parties, where this is required.

Note: the PSR proposal can be in English or French.

The Technical Committee makes a consensus decision as to whether the PSR proposal conforms to the PEP ecopassport® Program reference documents by assessing the quality of the interested organisation's responses to the comments it expressed.

Phase 3: Critical review

When the Technical Committee has made its decision, the PSR proposal is submitted to an independent third-party organisation to be checked as part of a Critical review in conformance with the requirements of NF ISO 14025:2006. This organisation, which must be independent of the PSR creation process:

- Checks that the PSR complies with the ISO 14025:2006, ISO 14040 and ISO 14044:2010 international reference standards,
- Ensures that it is consistent with the requirements of the "PCR – Product Category Rules" of the PEP ecopassport® Program,
- Issues a Critical review report and a declaration of conformity.

The Critical review report and the declaration of conformity remain valid, without a specific date limit, until the PCR, or the normative reference texts to which they refer, are modified.

Note: the cost of the Critical review is paid either by the professional organisation or by the company proposing to create the PSR. If the latter is a member of the P.E.P. Association, it can ask the Association to fund all or part of the cost of the Critical review, up to the amount set by the Steering Committee.

Phase 4 : Adoption et enregistrement du PSR

Phase 4: PSR adoption and registration

At the end of the Critical review, the interested organisation provides the Technical Committee with the Critical review report, the declaration of conformity and the finalised PSR project (Word and pdf files in English or French).

- The Technical Committee determines the conformity of the PSR on the basis of the result of the Critical review and makes a recommendation to the Program Steering Committee.

Note: the Critical review report can be consulted upon simple request to the General Secretary of the P.E.P. Association.

- The Steering Committee decides whether or not to accept the document as a new PEP ecopassport® Program PSR. If it is rejected, the Steering Committee explains its decision to the interested organisation.
- If it is accepted, the Steering Committee asks the General Secretary to assign a registration number to the new PSR, in the format PSR-XXXX-edX-EN-YYYYMMDD, and officially issues it.
- The PSR issuer provides the General Secretary with the Word and pdf files of the French and English versions of the PSR identified and in the format of the attached template within a maximum of three months from the date of its acceptance by the Steering Committee, together with the Critical review reports, for filing and publication on the website.

Application date

The requirements defined in the new PSR apply within a maximum of 6 months from the date of publication. To be registered in the PEP ecopassport® program, PEPs must comply with the requirements specified by the PSR, as the products covered by the PEP are governed by the PSR.

Validity period and modification procedure

Under the PCR validity rules defined in the general instructions for the program, the PSR remains valid with no particular date limit, until the PEP ecopassport® program considers that modifications are necessary in order to take account of:

- Modifications to the "PCR – Product Category Rules" or normative reference documents to which the PSR refers,
- A justified request from the interested organisation from which the PSR originated or any other interested party to update the PSR.

If the PSR modification request is accepted by the Technical Committee, the drafting and adoption procedure is the same as the PSR creation procedure described in this document.

2. PSR drafting guidelines

The PSRs - Product Specific Rules - provide the details and additions to the common rules of the "PCR - Product Category Rules" that are necessary to establish PEPs on an objective and consistent basis. All these rules play an important part in ensuring the comparability of the PEP environmental data.

These sector-based application PSRs cannot modify or contradict the common rules of the "PCR - Product Category Rules" and the ISO 14025:2006, ISO 14040 and ISO 14044:2010 reference standards. They are drawn up as part of the procedures specified by the PEP ecopassport® program.

To ensure that the "PCR - Product Category Rules" are consistent and to make it easier to apply and update them, the PSRs must:

- Clearly define the product family or families covered by the PSRs, on the basis of the international and European standards specific to these products;
- Indicate the paragraph in the "PCR - Product Category Rules" to which the details or additional requirement refer, taking its structure into account and using the same terminology;

- For each of the product families covered, determine the minimum additions to the common rules required for:
 - The functional unit
 - The reference life time
 - The use scenario
 - The reference flow elements to be taken into account or that can be ignored;
- Justify and document the recommended requirements and accepted assumptions: normative or regulatory sources, study results, sector-based convention or anything else that substantiates their relevance;
- Identify the organisation that performed the Critical review, as well as the date it was carried out;
- Be written according to the model of PSR realisation – see document « PSR-modele-ed1-EN »
- If applicable, the PSR can specify:
 - the organisations involved in drafting the PSR: companies, interested parties, Technical Committee members, etc.
 - any items to be recorded in the accompanying report
 - the additional editorial rules to be mentioned on the PEP
 - the extrapolation rules allowing users to use environmental data for other products covered by the PEP than the reference product for which the PEP itself was compiled. In this case, the choice of extrapolation rules to be used will be justified in the PSR.

3. PSR adoption logic diagram

| PSR adoption logic diagram: | | | | | | |
|-----------------------------|----|--|---|---|--|--|
| PHASE | | WHO? | WHAT? | DELIVERABLES | TIMING | COMMENTS |
| Phase 1: Suitability | 1 | Any interested organisation or company | Proposal for a new PSR for a category of products | Project presentation to the Steering Committee: reasons, scope of the products concerned, resources mobilised | 15 days before 1st SteerCom | Presentation to SteerCom, via general secretary |
| | 2 | Steering Committee on Technical Committee's recommendation | Decision on the admissibility and feasibility of a new PSR | Reasoned decision by Steering Committee | At the latest, 3 months after submission of the dossier | Via general secretary |
| | 3 | Technical Committee | Information to the Accredited Verifier Club of the PSR project | Provision of information concerning the project of PSR (scope, planning, contact) | After validation of the project by the SteerCom | Through chairman of Accredited Verifier Club |
| Phase 2: Creation | 4 | Organisation(s) | PSR proposal | PSR project V1 (Word) | 1st TechCom | Presentation of PSR to TechCom by the organisation |
| | 5 | Technical Committee | Proposition of PSR to the Accredited Verifier Club sending First opinion on the conformity of the PSR project: - requirements of the PEP ecopassport Program and conformity with ISO 14025 - consistency with existing PSRs | First documented reasoned opinion, with comments from TechCom members (on Excel doc template) | 15 days before 2nd TechCom | Approx. 2 weeks for detailed feedback to TechCom |
| | 6 | Organisation(s) | PSR proposal | PSR project V2 (Word) + Response to TechCom's comments (Excel) | 2nd TechCom (or +) | Optional step (1) that can be repeated as often as necessary (2), depending on whether the feedback at the previous step is positive (1) or negative (2). |
| | 7 | Technical Committee | Technical Committee approval | Go-ahead from the Technical Committee to progress the PSR Project to the Critical review stage | 2nd TechCom (or +) | - |
| Phase 3: Critical review | 8 | Technical Committee | Public consultation | Public consultation through "News" space on www.pep-ecopassport.org website | After validation of the PSR by TechCom | This step can be concomitant with the step of third part critical review |
| | 9 | Technical Committee | Selection of the independent organisation that will carry out the Critical review | Specifications and estimate in conformance with the recommendations of the PEP ecopassport program | On the organisation's proposal, with the approval of the Technical Committee | Third party not involved in creating the PSR (PEP Association provides a non-exhaustive list of organisations for the Critical review; any organisation not included in this list will be assessed by the PEP Association) |
| | 10 | Independent organisation responsible for the Critical review | Critical review of the PSR proposal with respect to: - conformity with ISO 14025, 14040 and 14044 - conformity with PCR | Critical review report + declaration of conformity | After 2nd TechCom | According to prior approval by TechCom |
| | 11 | Organisation(s) | PSR proposal | PSR Project V3 finalised (Word) + Response to TechCom's comments (Excel) + Response to comments in the third-party critical review + Final notice of compliance by third party | 8 days before 3rd TechCom | - |
| Phase 4: Registration | 12 | Organisation(s) | List of main points relevant for the verification of PEPs | List of main points relevant for the verification of PEPs | Before the registration of the document | List sent to Accredited Verifiers, through the chairman of the Club |
| | 13 | Technical Committee | Decision: * OK * NOK | * OK: notice of compliance sent to StCom * NOK: reasons for NOK | 3rd TechCom | Via Technical Committee chairman |
| | 14 | Organisation(s) | Document finalised Translation of the document initiated (into English and French as a minimum) | Translated PSR to be sent to the Technical and Steering Committees of the PEP Association | 8 days before 2nd StCom | Via TechCom chairman. The English version of the PSR can be made available within three months of registration of the French version of the PSR (the translation must not delay the registration of the PSR). |
| | 15 | Steering committee | Final approval | Assignment of a registration number to the new PSR Registration of the new PSR Publication of the new PSR | 2nd StCom (After 3rd TechCom) | give the files to general secretary |