



# Sustainable Minds®

Sustainable  
development

Greenhouse  
gas

Climate  
change

CO<sub>2</sub>

## SM Transparency Report [EPD]<sup>™</sup> Framework

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# Governance and Program Rules

Version 4.0 | February 2026

## **Governance and program rules**

Version 4.0 | February 2026

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## Preface

### Introduction

A Sustainable Minds Transparency Report [EPD]™, also known as an environmental product declaration (EPD), is an ISO 14025:2006 Type III environmental declaration that communicates or discloses information about the environmental impacts associated with products, services, and systems based on life cycle assessment (LCA) promoting life cycle thinking. An EPD communicates verifiable, accurate, and non-misleading environmental information. Type III environmental declarations (EPDs) are transparent information disclosures that facilitate informed decision-making and support comparisons among competing products, services, or systems that fulfill the same function. Type III environmental declarations are guided by ISO 14025:2006 and are not the same as Type I third-party certified eco-logos or Type II self-declared single attribute environmental claims.

Parts A and B of the Sustainable Minds Transparency Report [EPD]™ Framework establish the principles and specify the procedures for developing an EPD. An EPD is created by following the general rules of Part A and often additionally the specific rules of Part B, the product group definition. Part A is based on several public standards and LCA best practices. It conforms to ISO 14040:2006, 14044:2006, ISO 14020:2000, and ISO 14025:2006, and it builds on a vast experience in and expertise of life cycle assessment and environmental product declaration programs around the world, particularly regarding the application of ISO 21930:2017.

Part A provides the general rules that apply to any product and is often used in conjunction with Part B to create a two-part PCR. It specifies the standards of LCA calculation rules as a prerequisite of EPDs as well as the requirements of the LCA background report. A product group consists of products that compete for/deliver the same function or purpose as defined in Part B.

The Sustainable Minds Transparency Report [EPD]™ Framework seeks to help manufacturers / organizations communicate the environmental performance of their products, services, and systems in a transparent and credible manner and aims to stimulate the potential for market-driven environmental improvement on a global scale.

## 1.0 General program rules

These rules represent generally accepted program instructions and are used in the operation of the Sustainable Minds Transparency Report [EPD]™ Framework with the intent to maintain and develop the framework used in the production and publication of EPDs for any product or service. These instructions meet the requirements of ISO 14025:2006 *Environmental labels and declarations – Type III environmental declarations – Principles and Procedures* and ISO/TS 14027:2017 *Environmental labels and declarations — Development of product category rules*. The Sustainable Minds Transparency Report [EPD]™ Framework is comprehensive and supports manufacturers / organizations in the communication of the environmental performance of their products, services, and systems on the basis of predetermined parameters in a uniform, fair, and transparent manner.

### 1.1 Scope of the program

The Sustainable Minds Transparency Report [EPD]™ Framework covers the maintenance of Part A, the development of Part Bs, and the administration of Type III environmental declarations for any product or service in business-to-business or business-to-consumer communications. The aim is to stimulate market-driven continuous improvement. EPDs are used for a variety of market applications but are not intended for comparative assertions. This program intends to perform these activities primarily in the North American market but is structured in a way that allows global application. The program covers

primarily building and construction products and services but is structured to cover other product types as well across the industrial sector. The program supports other Type III environmental declaration programs in North America and across the world and aims to harmonize Type III environmental declarations internationally.

## 1.2 Objectives of the program

The program's objective is to provide comprehensive environmental data through the development of product category rules (PCRs). The program ultimately aims to publish and communicate EPDs in a transparent, consistent, comparable, and credible manner ensuring a science-based approach that is independently verifiable and consistent with ISO 14025:2006. Aligned with this aim, the program strives to develop PCRs which conform to the American Center for Life Cycle Assessment (ACLCA) PCR Open Standard, version 1.0, published May 2022. Since verified EPDs contain verified and objective information, Sustainable Minds effectively aims to encourage the demand for products and services that cause less stress on the environment.

## 1.3 Program operator

Sustainable Minds is a software and services company whose mission is to operationalize environmental performance in mainstream product development and manufacturing.

As the program operator, Sustainable Minds will perform the following duties:

- Prepare, maintain, and communicate the general program rules;
- Ensure adherence to the program rules;
- Invite industry and LCA experts to participate in the development and maintenance of the Sustainable Minds Transparency Report [EPD]™ Framework on any level. The procedures will follow the requirements of ISO 14025:2006;
- Publish the list of organizations involved as interested parties in the PCR;
- Facilitate participation and involvement of interested parties;
- Ensure Type III environmental declaration requirements are followed (see section 7 for requirements);
- Establish a procedure to safeguard the consistency of data within the program (see Part A);
- Maintain publicly available lists and records of Part Bs and EPDs within the program (see section 3);
- Complete the applicable checklist(s) from the ACLCA PCR Open Standard v1.0 (available at <https://aclca.org/pcr/>) for each new PCR developed in conformance to the open standard and furnish the completed checklists to the PCR review panel;
- Publish Part Bs and EPDs within the program;
- Monitor changes in procedures and documents of related Type III environmental declaration programs and revise procedures and documents when necessary;
- Ensure the selection of competent independent verifiers and Technical Advisory Board (TAB) members (i.e., third-party advisory board for the framework's maintenance);
- Appoint the third-party verifiers for the review of LCA background reports and verification of EPDs to Part A and/or Part B;
- Establish a transparent procedure for the development and maintenance of the framework (see section 5);
- Establish procedures to avoid misuse of references to ISO 14025:2006, the Type III environmental declaration program, its EPDs and, where relevant, its logo (see section 9).

## 1.4 Audience of the program

The audience of the Sustainable Minds Transparency Report [EPD]™ Framework is both business-to-business and business-to-consumer.

## 1.5 Involvement of interested parties and funding disclosure

Sustainable Minds is responsible for soliciting and inviting the involvement of interested parties in the development and maintenance of this governance document and PCRs developed in the framework and will facilitate their participation in an open consultation process. The organizations involved as interested parties in the development of these general program instructions include Sustainable Minds.

The process to develop and maintain the PCRs will be open to all parties, including but not limited to product manufacturers, material suppliers, trade associations, purchaser, end-users, consumers, product specifiers, consumer organizations, governmental and public bodies, verifying agencies, independent agencies, and non-governmental organizations. Sustainable Minds will actively reach out to interested parties to ensure that each PCR Committee is composed of independent members, making sure that the interests of one party do not dominate the Part B development process. No single interested party category (at individual, organizational, or sectoral levels) should dominate the membership of a PCR Committee.

Sustainable Minds will request names and affiliations associated with comments submitted during the PCR open consultation process. The date(s) of the open consultation announcement and communication channel(s), open consultation dates, comments received, and associated commentors and affiliations will be made available to the Part B review panel upon request.

Sustainable Minds will disclose funding sources for development of a Part B to participating parties, including any external funding. This disclosure must be documented via email, formal statement, or meeting minutes of the working group. Such documentation must be provided to the Part B review panel upon request. If Sustainable Minds determines that funding sources might cause conflicts of interest, it will address potential conflicts by implementing specific process modifications (e.g., role definitions and/or separation of duties). Each Part B will include an attestation that this policy was followed during its development.

Sustainable Minds will ensure that reasonable balance among the members of the review panel is achieved and that potential conflicts of interests are identified (see Section 6). Sustainable Minds will also ensure that the appropriate parties are included in the Part B creation process in order to ensure the credibility and transparency of the program operation and to ensure a broad acceptance and reproducibility of the LCA calculation rules.

## 1.6 Product group

EPDs shall only be developed for products which are within the scope of the applicable PCR(s).

EPDs for building and construction products and services shall also conform to ISO 21930:2017. In cases where no applicable PCR exists for building and construction products and services, EPDs may be published in conformance to Part A and ISO 21930:2017. Justification for publishing without a Part B shall be stated in the background LCA report. Examples of construction products are goods, assemblies, and systems that are semi-permanently or permanently incorporated into buildings, civil engineering projects, or other assets, such as products used for structural, envelope, interior, mechanical, and infrastructure applications.

For products outside of this definition (i.e., non-construction products), a product group will be defined within Part B. EPDs may be published to Part A in combination with an existing Part B for the applicable product category.

## 1.7 Conformance to relevant standards

EPDs developed under this program will conform to the applicable PCR(s) which conform to the relevant international standards (see Section 15), especially ISO 14025:2006.

As part of the development of new Part B PCRs, each Part B working group will be responsible for determining whether the new Part B will conform to the ACLCA PCR Open Standard v1.0, and if so, completing the ACLCA PCR Open Standard v1.0 PCR Committee checklist and documenting the associated supporting information. The working group will complete the checklist and documentation according to the use case goal determined by the working group. The completed checklist and documentation must be provided to the PCR review panel.

## 2.0 Procedure for the definition of product groups

The product groups will be defined pursuant to the rules outlined in Part B. Part B will use recognized product category code naming conventions as applicable, such as the CSI MasterFormat® ([www.csiresources.org](http://www.csiresources.org)), UNSPSC ([www.unspsc.org](http://www.unspsc.org)), or GS1 ([www.gs1us.org](http://www.gs1us.org)).

## 3.0 Management of data and documentation

Sustainable Minds will manage data and documentation in accordance with its internal procedure for the control and maintenance of documents, which is aligned with ISO 14001:2004 Clause 4.4.5, Control of Documents.

Sustainable Minds will maintain a publicly available list of completed Part Bs, Part A, and supporting documentation as required by ISO 14025:2006. These documents will be available at the Sustainable Minds website at <http://www.sustainableminds.com/>.

Sustainable Minds will maintain a publicly available list of EPDs. These documents will be available upon request or at <http://www.transparencycatalog.com/>. EPDs may also be made publicly available by the manufacturer.

## 4.0 Data confidentiality management

When developing Part Bs and publishing EPDs, Sustainable Minds will not disclose without a Company's prior written consent and will keep confidential any information supplied to it by a Company about the Company and its Product(s) such as life cycle inventory (LCI) and life cycle impact assessment (LCIA) data. Sustainable Minds will release the information only to those persons or agencies authorized or required by law to receive such information such as LCA practitioners appointed by Sustainable Minds or third-party verifiers who in turn will keep this data confidential. Confidentiality does not apply to any information known to Sustainable Minds independently, generally available to the public, or obtained by Sustainable Minds from a third party under no obligation to the Company not to disclose said information. Life cycle impact assessment data and additional information are published in the EPD according to the requirements of Part A and Part B.

## 5.0 Development and maintenance of framework and LCA methodology

### 5.1 Content of the framework

Sustainable Minds prepares the drafts of the documents of the framework in collaboration with interested parties. Sustainable Minds will ensure that the development of the contents of the framework documents is in conformance with ISO 14025:2006, Clause 6.7. The content of PCRs developed using this framework can be found in Sustainable Minds Part A and the Sustainable Minds Part B form available on the Sustainable Minds website.

### 5.2 Period of validity

**Part A will be reviewed and updated as needed on an annual basis.** Requested changes may be brought to the attention of the TAB by any interested party at any time throughout the year. The TAB will review the proposed changes and either correct errors in PCRs immediately when they are discovered, or issue amendments for other suggestions. A list of amendments will be kept by Sustainable Minds. These amendments can be used, but they are not required to be used in the production of new EPDs during that year. Existing EPDs do not lose their validity due to amendments. Updating an EPD to incorporate these amendments is voluntary. The amendments will be fully incorporated into Part A during the annual review.

**Part Bs are valid for a period not to exceed five (5) years.** Prior to the expiration, proposed changes will be reviewed by the TAB and a consultative process will take place.

### 5.3 Monitoring related Type III environmental declaration programs and their respective PCRs

Sustainable Minds, as the program operator, strives to keep up to date about PCRs and general rules of programs. The intention is to make EPDs of the same product group (i.e., belonging to the same Part B) as comparable and consistent as possible. When it improves comparability and consistency, without compromising the data quality, EPDs from different programs using the same PCR should be aligned. Consistency of Type III environmental declarations from different program operators in order to align common elements is encouraged by Sustainable Minds.

### 5.4 Application of LCA methodology

The quantified environmental information in EPDs is based on ISO 14040 series conformant LCIA and LCA results.

### 5.5 Selection procedure for predetermined parameters in LCA

Predetermined parameters for the reporting of LCA data are outlined in the PCR to ensure uniformity and consistency. The foregoing can be further modified in consultation with the TAB and other interested parties to support practical and consistent data acquisition, as well as a fair and complete selection of environmental aspects to be addressed in the calculations behind the production of EPDs. Predetermined parameters may be identified from one or more LCAs performed in accordance with the ISO 14040 series of standards or from an information module developed in support of a Type III environmental declaration.

As indicated in ISO 14025:2006, the following parameters resulting from LCA or from information modules may be considered as predetermined parameters:

- A set of impact category indicator results
- A set of inventory results that are elementary flows (e.g., iron ore, CO<sub>2</sub>)
- A set of data that do not represent elementary flows (e.g., waste)

## 5.6 Assessing data quality

If desired to achieve “Procurement” or “Data Source” level conformation with the ACLCA PCR Open Standard v1.0, Sustainable Minds will follow the recommendations of the ACLCA PCR Open Standard addendum “Assessing Data Quality of Background Life Cycle Inventory Datasets” during the development of new Part Bs. Sustainable Minds will:

- Adopt the Enhanced Pedigree Matrix as described in the addendum
- In consultation with the Part B working group, identify and prescribe background LCI data sets
- In consultation with the Part B working group, identify and prescribe inventory data for fossil fuels, transport, equipment, and electricity as described in the addendum
- Candidly describe data gaps and avoid data gaps, to the extent practicable, by developing inventory data to fill significant gaps
- Document justification of deviations from the above procedures in the Part B

## 6.0 Third-party verification of the framework including stakeholder consultation

A third-party Technical Advisory Board (TAB) maintains the framework. As the program operator, Sustainable Minds will ensure a reasonable mix of interested parties’ perspectives and competencies.

### 6.1 TAB membership

There is an open application process for TAB membership. Members of the TAB may have different competencies and backgrounds and may represent different types of organizations:

- Members of industrial sectors
- Members of governmental institutions
- Members of academic institutions
- Members of NGOs
- Members of national trade organizations
- General background of industrial sectors, products, and products-related environmental aspects
- Expertise in LCA and methodology for LCA work
- Awareness of relevant standards in the fields of environmental labelling and declarations and life cycle assessment
- Knowledge of regulatory framework within the scope of the framework and other PCRs
- Knowledge of the program for Type III environmental declarations

The TAB consists of an uneven number of members with a minimum of four members and a chairperson. The board will have as a minimum two LCA experts, one manufacturing industry representative, and one representative from a verifying body. Members can be appointed by a majority committee vote for a two-year period and can be re-appointed for a 2<sup>nd</sup> term. Members can appoint a chair and vice-chair amongst themselves. The chair and vice-chair can be appointed by a majority committee vote for a two-year period and can be re-appointed for a 2<sup>nd</sup> term.

### 6.2 TAB roles

1. Based on international technical rules, the committee of experts draws up evaluation and declaration guidelines that are to be observed when determining the environmental comparability of a product or component and monitors environmental declarations, frameworks, and product group-specific rules.
2. The board can issue rulings on functional units that are product group-specific which then get reflected in Part Bs.
3. The board can advise Sustainable Minds to make changes to the framework.
4. The board operates to agreed guidelines.
5. The board has the right to propose the dismissal and appointment of its members.
6. The board can elect a chairman and vice-chairman from among its members.

### 6.3 TAB guidelines

The TAB acts as a third party and reviews the proposed rulings to the framework, including Part Bs. As a neutral body, it addresses conflicts of interests. When checking the proposed rulings, members guarantee their completeness in regards to the most significant environmental effects of the respective product groups. The key role is to maintain consistencies between Part Bs. Rulings are checked for completeness, plausibility, and the fulfilment of the demands on data quality. The check takes place by member(s) of the TAB and/or by experts who are called in. Sustainable Minds provides coordination support to the committee.

The TAB aims for unanimous decisions but could make decisions based on a majority vote. When the proposed rulings are not accepted by the TAB and after two rounds of communication in good faith, the TAB can request a technical paper/presentation be provided in order to further the deliberations and reach a majority vote.

A member will recuse themselves from voting if a conflict of interest arises. The conflict of interest may arise if a member belongs to or is economically dependent on a manufacturer / organization which produces a significant part of or contributes significantly to the product's performance to which a decision is being deliberated.

### 7.0 Independent review of PCRs

Sustainable Minds will ensure that a transparent independent review of PCRs is performed and that public consultation takes place in accordance with ISO 14025:2006, Clause 8.1.2. After an update to the 'Part A: LCA calculation rules and report requirements', or after a new or updated Part B is developed, it is open for public comment for a period of at least 30 days. The PCR review panel will prepare comments, and any public comments received as well as all responses to comments and recommendations made will be made available to the PCR review panel. The review will ensure that:

- The framework supports credible, comparable, and consistent EPDs
- The rules of ISO 14040 are followed, especially the provisions defining scope and goal of an LCA study. Care should be taken that the provisions (e.g., functional or declared unit – allocation and calculation rules are adequate for the product group)
- The selection of predetermined parameters to be reported is adequate for the product group under study (e.g., no relevant information is missing)
- Part B is based on experience with LCA studies carried out in conformance with ISO 14040-44
- The additional information is based on scientifically sound methodology
- Review panel comments on new Part B PCRs conformant to ACLCA PCR Open Standard v1.0 are received within a 90-day period; the period will be documented in the PCR review panel comments

Competence of PCR review panel members and verifiers will be determined in conformance with ISO 14025:2006, Clause 8.2, Independence and competencies of verifiers and PCR review panel.

## 8.0 Independent verification of EPDs

Sustainable Minds will publish EPDs based on the applicable PCR(s). Verified EPDs will conform to the relevant standards for Type III environmental declarations in that they have undergone a third-party review in conformance with the PCR in order to ensure the highest standard of credibility.

Independent review of the EPD and underlying data will be performed in accordance with ISO 14025:2006, Clause 8.1.3, Independent verification of data and ISO 14025:2006, Clause 8.1.4, Independent verification of the of the Type III environmental declaration.

Competence of the independent verifiers will be determined in conformance with ISO 14025:2006, Clause 8.2, Independence and competencies of verifiers and PCR review panel.

Verification will be transparent. The independent verifier will document the verification process, while adhering to his/her obligations for data confidentiality. The independent verifier cannot be the same entity that performed the LCA. These reports will be available to any person upon request. The verification procedure will confirm whether the information given in the EPD accurately reflects the information in the documents on which declaration is based (i.e., LCA and other documentation). The verification process will also confirm whether this information is valid and scientifically sound. Third-party independent verification of data from LCA, LCI and information modules, and additional environmental information and/or claims that are not traditionally covered in the LCA but included within the EPD will at minimum confirm:

- Conformance to the PCR(s) (conformance with relevant process- and product-related information and environmental considerations)
- Conformance to the ISO 14040 series of standards
- Conformance to the EPD general program rules
- Plausibility, quality, accuracy, and completeness of the LCA-based data
- Quality and accuracy of additional environmental information

Sustainable Minds appoints the verifier(s). Members of the TAB can also act as verifiers of the LCA background report and EPDs if and only if they are not financially dependent on the LCA provider completing the study or the manufacturer / organization producing the EPD. Sustainable Minds will arrange for sample checks of the EPDs and the LCA background report (see Part A) to be used by the verifiers.

The minimum competency requirements for the verifiers are the following:

- Minimum three years of expertise in LCA and methodology for LCA work
- General background of industrial sectors, products, and products-related environmental aspects
- Process and product knowledge of the product group
- Knowledge of the relevant standards in the field of environmental labelling and declarations and life cycle assessment
- Knowledge of the regulatory framework within the scope of the framework and other PCRs
- Knowledge of the program for Type III environmental declarations

## 9.0 Process for the development of PCRs and EPDs

A manufacturer or industry association of a product or product category often take the initiative to establish the rules needed to develop an EPD, which begins with the identification, update, or creation of

a PCR. Once a sponsor has initiated this decision process, the first step is to look for an existing valid North American PCR relevant to the product(s). Sustainable Minds will determine whether to create a new Part B or, if an existing PCR is reaching its expiration date, reach out to the program operator to determine next steps. If the sponsor is looking to modify an existing PCR relevant to the product, Sustainable Minds will engage the program operator for that PCR to reconvene the PCR Committee for an update. If a new Part B is developed, a justification will be documented in the new Part B, including existing PCRs considered, the supporting LCA used to develop the new Part B, and a description of adapted elements from other PCRs as applicable. If there is no relevant PCR, a Part B request can also be submitted by the sponsor to [TAB@sustainableminds.com](mailto:TAB@sustainableminds.com).

#### **Part B creation process:**

- a. **Initiation, public call for participation, and PCR Committee formation:** Sustainable Minds receives a request for a new or updated PCR, or a sponsor sends an email to the TAB that a Part B request has been initiated.

A public notice is posted on the Sustainable Minds website, through relevant industry and trade publications and/or news services, and through centralized notification mechanisms. Such notices will include Sustainable Minds' contact information. The relevant dates and methods of communication will be documented in the Part B.

A PCR Committee is formed (minimum three members) for the development of Part Bs. Sustainable Minds will invite participants with relevant expertise if not on the TAB and ensure that the committee chair demonstrates sufficient knowledge of and proficiency in LCA Type III environmental declarations and footprint communications according to ISO 14044, ISO 14025, ISO 14046, and ISO/TS 14067. Sustainable Minds will ensure that the committee chair promotes collaboration between PCR committee members and seeks contributions from them, recording the PCR Committee's decisions in the published Part B.

If desired to achieve "Data source" level of conformance with the ACLCA PCR Open Standard v1.0, the working group will identify and evaluate relevant upstream and downstream PCRs in the value chain and consider alignment with those PCRs. Such alignment efforts and outcomes will be documented in the Part B, including differences in allocation rules, potential conflicts or inconsistencies, and how such differences were resolved.

- b. **Drafting:** The PCR Committee develops content for each section of the Part B. For updates to PCRs, when the previous version of the PCR was managed by another program operator, the PCR Committee first imports the PCR content into the Sustainable Minds Part B form and then makes changes and additions as needed. The same process can be applied for adaptations of PCRs from other geographical regions, with the addition that Sustainable Minds will inform the program operator of the adaptation if not already done as part of harmonization efforts.
- c. **Review:** The draft Part B is reviewed by a technical review panel. At least three individuals, from the TAB or external if deemed appropriate, will form the review panel to verify that the Part B meets the desired requirements, in accordance with relevant LCA-based claim standards, framework governance, specifications, and guidelines, and ensure that it supports the creation of credible and consistent claims.

Each member of the review panel will complete the Sustainable Minds conflict of interest form and provide the completed form to Sustainable Minds. If the Part B seeks conformance to the ACLCA PCR Open Standard v1.0, then the review panel will also review the completed Program Operator and PCR Committee checklists and verify conformance to the appropriate level of EPD

use, and they will complete the PCR Review Panel checklist and sign-off and/or list deviations from the ACLCA Open Standard v1.0 requirements. If applicable, the review panel will confirm the Part B meets relevant EPD-related federal and/or state procurement requirements (e.g., Buy Clean legislation) that are specifically referenced in the Part B.

The review panel will generate and compile their comments in a review report. The PCR Committee will generate responses to the technical review and make updates to the draft Part B as necessary.

The draft Part B is posted on the Sustainable Minds website for a public consultation period of at least 30 days and includes instructions for how to submit comments. An email notification is sent to interested parties and relevant stakeholders announcing the consultation period. The PCR Committee will generate responses to comments received during public consultation and make updates to the Part B as necessary.

- d. **Approve & publish:** Once all comments received from the technical review panel and during public consultation have been addressed, the Sustainable Minds Transparency Report [EPD]™ Framework coordinator provides the final Part B document to the PCR Committee and publishes it on the Sustainable Minds website. If the Part B seeks conformance to the ACLCA PCR Open Standard v1.0, then the supporting documentation is also published alongside the Part B.

#### **PCR update process:**

For updates to existing PCRs, in addition to the above, Sustainable Minds will confirm that the required steps have been followed:

1. Notify the original PCR Committee members and original technical review panel.
2. Consult ISO/TS 14027:2017 to confirm the reason to update is valid.
3. If PCR seeks conformance to the ACLCA PCR Open Standard v1.0, then create or update the ACLCA PCR Open Standard v1.0 Checklists.
4. Open consultation to interested parties.
5. Update the PCR.
6. Obtain sign-off by PCR review panel.
7. Republish an updated version and include a change log.
8. Announce the updated version.
9. Update the ACLCA PCR Repository.

#### **Sustainable Minds Part B renewal consideration process:**

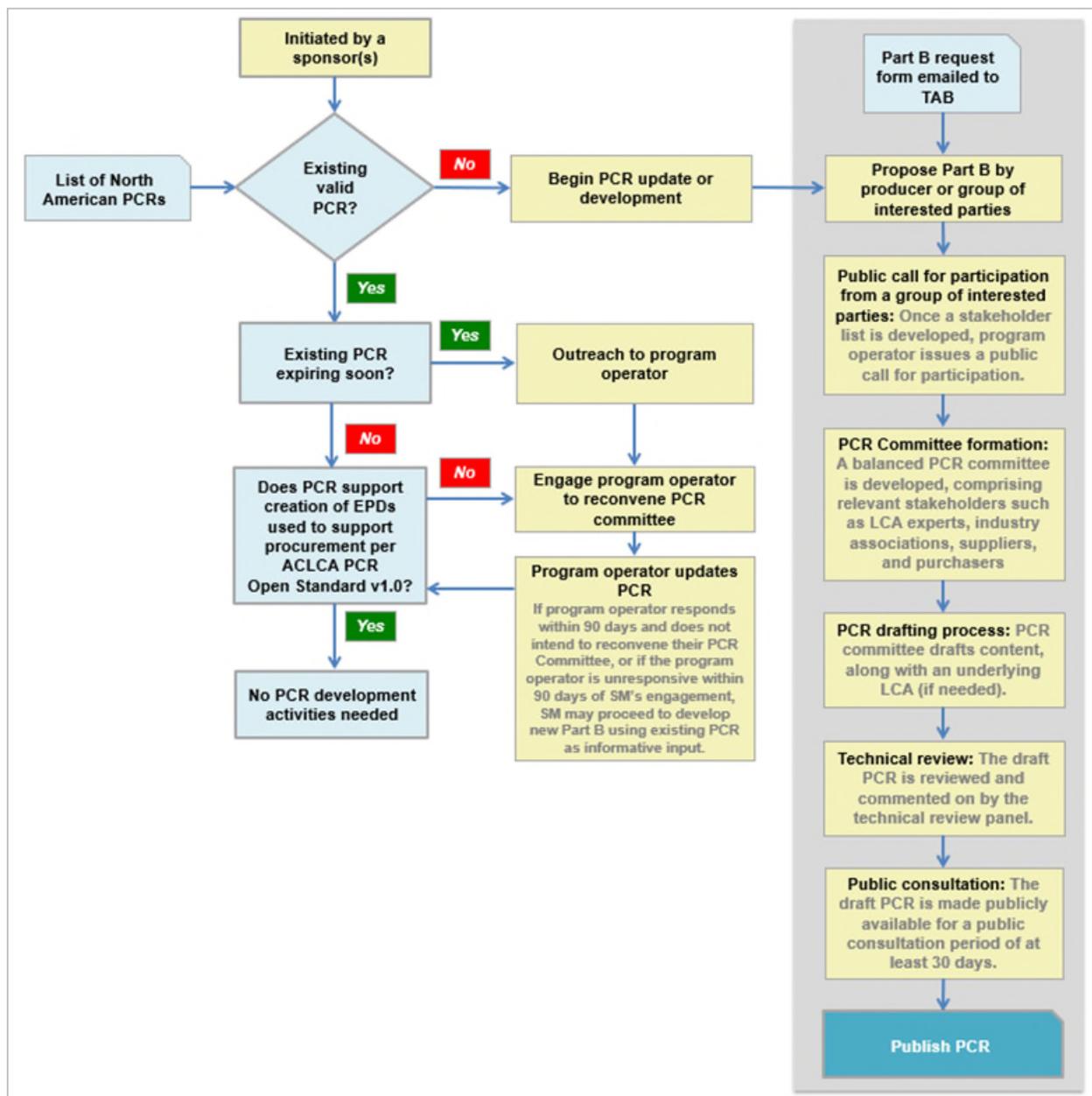
1. At least four months prior to a Part B's scheduled expiration, Sustainable Minds will reach out to the previous PCR Committee members as well as post a public notification on its website. The notification will communicate Sustainable Minds' intention to update, extend, or allow the expiration of the Part B and information on how to participate in a working group if an update is intended.
2. Sustainable Minds will maintain a URL address for all Part Bs that are approaching expiration and expected next steps.

Sustainable Minds will harmonize PCR activities with other EPD programs to avoid unnecessary duplication and proliferation of similar PCRs. EPDs may be published by other program operators in their own formats using a Sustainable Minds PCR. In the case that an existing PCR from another program operator does not meet the requirements for creating EPDs for public or private procurement purposes, Sustainable Minds will make an effort to first engage the program operator of the PCR to reconvene the PCR Committee in order to make the required updates. If the program operator responds within 90 days and does not intend to reconvene their PCR Committee, or if the program operator is unresponsive within 90 days of Sustainable Minds' engagement, then Sustainable Minds may proceed to develop a new Part

B using the existing PCR as an informative input document. If the program operator responds within 90 days stating intent to reconvene their PCR Committee, then Sustainable Minds will explore PCR harmonization opportunities with the program operator to expedite PCR creation and avoid unnecessary duplication and proliferation of similar PCRs (e.g., joint development, committee participation, or providing public comment).

In the case that a Part B is substantially updated such that the results of an EPD would be significantly impacted, Sustainable Minds will contact EPD owners in the Sustainable Minds program that have used the previous version of the Part B as well as other program operators to bring attention to the changes and encourage an optional update to existing EPDs (NOTE: the validity periods of the existing EPDs would not be affected by the updated Part B). Sustainable Minds will document the dates of contact to each relevant party and provide the documentation to the Part B review panel upon request.

The PCR update or development procedure is presented in Figure 1.

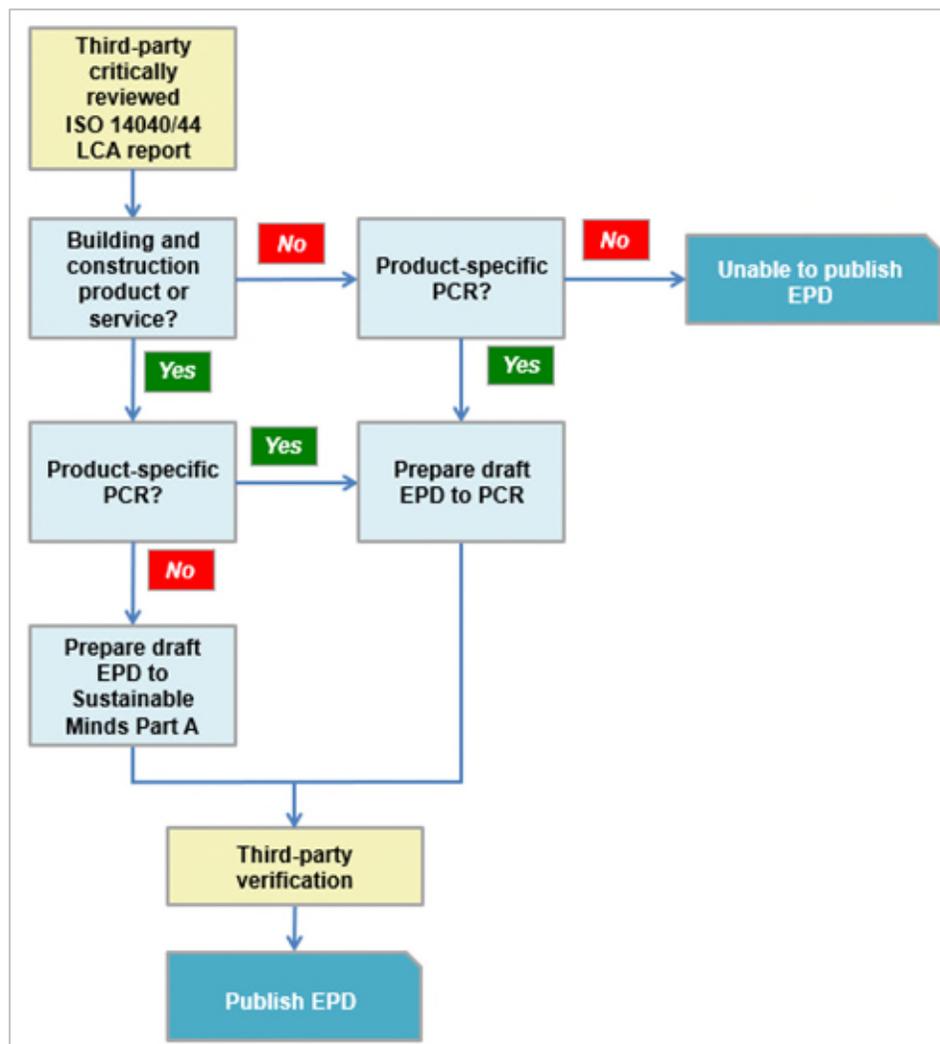


**Figure 1.** PCR update or development procedure

The first step of EPD development is identifying the applicable PCR. If there is a product-specific PCR, the draft EPD is prepared according to that PCR. If the LCA is for a building and construction product or service but there is no product-specific PCR, the draft EPD is prepared according to Sustainable Minds Part A. If the LCA is not for a building and construction product or service, and there is no product-specific PCR, an EPD is not able to be published. Once the draft EPD is complete, it is sent to a third-party verifier. A list of approved third-party verifiers is maintained by Sustainable Minds. After verification is complete, the EPD can be published by Sustainable Minds in the Transparency Catalog: <http://www.transparencycatalog.com/>.

Draft EPDs which have been prepared using a generator tool follow this same procedure.

The EPD development procedure is presented in Figure 2.



**Figure 2.** EPD development procedure

In cases where twelve consecutive months of production data is not yet available due to a new production line, such as with new product development or innovations in technology, a prospective EPD may be provisionally published at the discretion of Sustainable Minds upon a case-by-case review of the product and the available data. Prospective EPDs are valid for only one year, and once annual production data becomes available, they shall be updated following regular EPD development procedures (i.e., a prospective EPD cannot be re-issued without annual production data).

## 10.0 Appeals process

To ensure prompt and impartial handling of procedural complaints regarding any action or inaction of a PCR Committee, PCR Review Panel, or Sustainable Minds, the following appeals process will be followed.

1. Notice of complaint is received by an employee of Sustainable Minds or a TAB member. Such complaint must be promptly forwarded to the Sustainable Minds Technical Services Director.
2. The Technical Services Director will promptly review the complaint and determine whether to escalate or delegate specific tasks which may resolve the complaint.
3. Depending on the nature of the complaint, the Director (or designee) will engage the complainant, the TAB, and/or other interested parties to identify and discuss options for resolving the complaint. Resolutions may range from no action, updates to a Part B or EPD, or re-review or delisting of a Part B or EPD. In some cases, the complainant may be responsible for additional effort and cost to update or review a Part B or EPD.
4. The Technical Services Director will be responsible for executing the agreed resolution or, in the case of no agreement, identifying next steps and escalating to the Sustainable Minds CEO.

## 11.0 Fees and resources for program development and operation

As the program operator, Sustainable Minds may seek funding from organizations to support program development and operation activities. Information about the program operation fee can be requested from Sustainable Minds. No participation fees are charged by Sustainable Minds to interested parties for participation in development of the framework or for commenting on draft documents in the framework.

## 12.0 Procedures to avoid misuse of references to the program and its logo

The general legal requirements for the protection of rights on intellectual property apply. Sustainable Minds and the Sustainable Minds logos are registered trademarks of Sustainable Minds. No manufacturer or person will apply or use the logos in connection with a product or EPD, or represent in any way that the EPD is independently verified by Sustainable Minds, until receipt of written authorization from Sustainable Minds or any of its partners. Sustainable Minds will not be expected to keep track of all applications of the EPDs developed under its program. Sustainable Minds may pursue legal recourse if the logo or references of the framework are misused.

## 13.0 Periodic review of general program rules

Sustainable Minds will ensure that the general program rules are reviewed at least every five years and updated as needed.

## 14.0 Symbols and abbreviations

EPD	Environmental product declaration
ISO	International Organization for Standardization
LCA	Life cycle assessment
LCI	Life cycle inventory
LCIA	Life cycle inventory assessment
PCR	Product category rules
TR	Transparency Report [EPD] <sup>TM</sup>

## 15.0 Terms and definitions

A more comprehensive list of terms and definitions can be found in Part A.

### **Type III environmental declaration**

A claim which indicates the environmental aspects of a product or service. It provides quantified environmental data using predetermined parameters and, where relevant, additional environmental information [ISO 14025:2006]

### **Program operator**

Body or bodies that conduct a Type III environmental declaration program [ISO 14025:2006]

### **Product category rules (PCR)**

Set of specific rules and guidelines for developing Type III environmental declarations for one or more product categories [ISO 14025:2006]

### **Verification**

Confirmation, through the provision of objective evidence, that specified requirements have been fulfilled [ISO 14025:2006]

### **Comparative assertion**

Environmental claim regarding the superiority or equivalence of one product versus a competing product that performs the same function [ISO 14025:2006]

### **Life cycle**

Consecutive and interlinked stages of a product system, from raw material acquisition or generation from natural resources to final disposal [ISO 14025:2006]

## 16.0 Reference documents

The following documents are referenced as requirements of these rules:

ISO 14020:2001	Environmental labels and declarations — General principles
ISO 14025:2006	Environmental labels and declarations — Type III environmental declaration – Principles and procedures
ISO 14040:2006	Environmental management — Life cycle assessment — Principles and framework
ISO/TS 14027:2017	Environmental labels and declarations — Development of product category rules
ISO 14044:2006	Environmental management — Life cycle assessment — Requirements and guidelines
ISO 21930:2017	Sustainability in buildings and civil engineering works — Core rules for environmental product declarations of construction products and services