



ERG's Environmental Product Declaration Requirements (Version 1.0)

Eastern Research Group, Inc.

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RECORD OF CHANGES

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CONTENTS

INTRODUCTION	4
REQUIREMENTS	4
LIST OF ABBREVIATIONS	7
TERMINOLOGY	8
REFERENCES.....	9

Introduction

This document outlines the specific requirements that ERG will use to evaluate EPDs under its quality program. The list below leverages International Organization for Standardization (ISO) standards, American Center for Life Cycle Assessment (ACLCA) standards, and the U.S. Environmental Protection Agency’s (EPA’s) Draft EPD Criteria released in December 2024. Any standards, guidance, or other references used to construct the requirements are documented in the “Reference/Rationale” column. For references to EPA’s PCR Criteria, baseline criteria are denoted with a “(B),” while leadership criteria are denoted with an “(L).”

Requirements

Criterion	Specific Requirement	Reference/Rationale
1.	The EPD shall be made in accordance with ISO 14025 and should disclose the version of ISO 14025 within the document.	ISO 14025:2006
2.	The EPD shall provide sufficient information to identify which type of EPD it represents with respect to data specificity. Type of EPD shall be mapped to the following nomenclature, if not already disclosed on the EPD: <ul style="list-style-type: none"> • Manufacturer-average and product-average EPD • Manufacturer-average and product-specific EPD • Facility-specific and product-average EPD • Facility-specific and product-specific EPD 	<i>ACLCA Guidance for Determining EPD Types and Calculating and Communicating Data Specificity Through the Supply Chain (2025)</i>
3.	The EPD shall identify the product(s) that it covers.	ISO 14025:2006, Clause 7.2.1.C; ISO 21930:2017, Clause 9.2.C
4.	The EPD shall include a description of each product that clearly outlines material and performance characteristics to distinguish each named product on the EPD from similar products.	ISO 14025:2006, Clause 7.2.1.B; ISO 21930:2017, Clause 9.2.B

Criterion	Specific Requirement	Reference/Rationale
5.	The EPD shall provide the unit of measure associated with the EPD (i.e., a declared unit or a functional unit, depending on the scope).	ISO 21930:2017, Clause 9.3; PCR Criteria 1.1.B (B)
6.	If an EPD is using a functional unit, it shall list the service life of the product.	ISO 21930:2017, Clause 7.1.4; PCR Criteria 1.1.B (B)
7.	The EPD shall include a description of the main product components or materials that make up the product being declared.	ISO 14025:2006, Clause 7.2.1.B; ISO 21930:2017, Clause 9.2.D
8.	The EPD shall provide the facility name(s) and address(es) associated with the facility or facilities at which the product is produced (i.e., the corporate office address of the parent company cannot be the sole address).	ISO 14025:2006, Clause 7.2.1.A; ISO 21930:2017, Clause 9.2.A
9.	The EPD shall provide the EPD holder's (e.g., manufacturer, association, service provider) name.	ISO 14025:2006, Clause 7.2.1.A; ISO 21930:2017, Clause 9.2.A
10.	The EPD shall provide the name of the program operator.	ISO 14025:2006, Clause 7.2.1.D; ISO 21930:2017, Clause 9.2.F
11.	The EPD shall list the name of the entity that developed it.	ISO 14025:2006, Clause 7.2.1.D; ISO 21930:2017, Clause 9.2.F
12.	The EPD shall include an indication of covered LCA information modules, including a minimum of A1 (extraction and upstream production), A2 (transport to factory), and A3 (manufacturing) modules. Results shall be disaggregated by life cycle stage.	ISO 21930:2017, Clause 5.2.1, 5.2.2; PCR Criteria 1.1.C (B), 1.1.G (B)
13.	The EPD shall report environmental impact categories.	ISO 21930:2017, Clause 7.3, Table 5; PCR Criteria 2.1.D (B)

Criterion	Specific Requirement	Reference/Rationale
14.	The EPD shall disclose the life cycle impact assessment (LCIA) method being used for each indicator category provided.	ISO 21930:2017, Clause 7.3, Table 5; PCR Criteria 2.1.D (B)
15.	The EPD shall clearly disclose limitations to comparability, including but not limited to items such as energy attribute certificates (EACs), biogenic carbon impacts, recycling allocation, book and claim systems, and mass balance approaches, as well as any relevant accounting methodology that support such impact disclosures.	ISO 14025:2006, Clauses 5.6 and 6.7.2; ISO 21930:2017, Clause 9.2J; PCR Criteria 2.1.N (B), 1.1.I (L)
16.	The EPD shall list the dates of validity (for no more than a five-year period).	ISO 14025:2006, Clause 6.7.1.K, 7.2.1.F; ISO 21930:2017, Clauses 7.1.9, 9.2.H, 9.2.I, 11;
17.	The EPD shall list the relevant valid PCR(s) and PCR version number(s) with which the EPD complies at the time of publishing.	ISO 14025:2006, Clause 7.2.1.E; ISO 21930:2017, Clause 9.2.G;
18.	The EPD shall be verified by an independent third party and provide the third-party verifier's name.	ISO 14025:2006, Clause 7.2.1, 9.4 ISO 21930: 2017, Clause 9.2; PCR Criteria 1.1.E (B)
19.	The EPD shall (when applicable) list the EPD generator tool and version number.	Listing this information will improve EPD comparability.
20.	The EPD shall (when applicable) list the LCA software name and/or model and version number.	Listing this information will improve EPD comparability.

List of Abbreviations

Abbreviation	Full Term
ACLCA	American Center for Life Cycle Assessment
EAC	energy attribute certificate
EPA	U.S. Environmental Protection Agency
EPD	environmental product declaration
ISO	International Organization for Standardization
LCA	life cycle assessment
LCI	life cycle inventory
LCIA	life cycle impact assessment
PCR	product category rule

Terminology

Biogenic carbon: Carbon derived from biomass. This definition is consistent with the one in ISO 21930:2017.

Biomass: Material of biological origin, excluding material embedded in geological formations or transformed into fossilized material, and excluding peat. Biomass includes organic material (both living and dead) from above and below ground; e.g., trees, crops, grasses, tree litter, algae, animals, and waste of biological origin such as manure. This definition is consistent with the one in ISO 21930:2017.

Book and claim model: A chain-of-custody model in which the administrative record flow is not necessarily connected to the physical flow of material or product throughout the supply chain. This chain of custody model is also referred to as “certificate trading model” or “credit trading.” This definition is consistent with the one in ISO 22095:2020.

Declared unit: Quantity of a construction material used as a reference unit in an EPD based on an LCA to express environmental information needed in information modules. This definition is based on the one in ISO 21930:2017.

Environmental product declaration (EPD): An environmental claim providing quantified environmental data using predetermined parameters and, where relevant, additional environmental information. An EPD also includes additional product and company information. This definition is consistent with the one in ISO 14025:2006.

Environmental product declaration generator (EPD generator): When referring to software, a tool that “generates” EPDs using input from manufacturers and an LCA template. EPD consultants can also generate EPDs without software generator tools.

Functional unit: The unit of comparison that ensures that the products being compared provide an equivalent level of function or service.

Life cycle assessment (LCA): The compilation and evaluation of the inputs, outputs, and potential environmental impacts of a product system throughout its life cycle. This definition is consistent with the one in ISO 14044:2006.

Product category rules (PCRs): A set of specific rules, requirements, and guidelines for developing EPDs for one or more product categories. This definition is consistent with the one in ISO 14025:2006.

References

- a) ACLCA (American Center for Life Cycle Assessment). (2025). Guidance for determining EPD types and calculating and communicating data specificity through the supply chain. 2022 ACLCA PCR Open Standard—Process and methods toolkit. https://cdn.prod.website-files.com/685abecf52079050b589879c/685abecf52079050b58988f5_EPD%20Classifications%20Addendum%20Final%202025.pdf
- b) EPA (U.S. Environmental Protection Agency). (2024). U.S. EPA criteria for product category rules (PCRs) to support the label program for low embodied carbon construction materials (EPA's PCR criteria) (Version 1—2024). EPA-740-R-24-009. Office of Chemical Safety and Pollution Prevention. <https://nepis.epa.gov/Exe/ZyPDF.cgi?Dockkey=P101BDR2.PDF>
- c) ISO (International Organization for Standardization). (2006). ISO 14025:2006: Environmental labels and declarations—Type III environmental declarations—Principles and procedures. <https://www.iso.org/standard/38131.html>
- d) ISO (International Organization for Standardization). (2006). ISO 14044:2006: Environmental management—Life cycle assessment—Requirements and guidelines. <https://www.iso.org/standard/38498.html>
- e) ISO (International Organization for Standardization). (2017). ISO 21930:2017: Sustainability in buildings and civil engineering works—Core rules for environmental product declarations of construction products and services. <https://www.iso.org/standard/61694.html>
- f) ISO (International Organization for Standardization). (2020). ISO 22095:2020: Chain of custody—General terminology and models. <https://www.iso.org/standard/72532.html>