

STICHTING MRPI® GENERAL PROGRAM INSTRUCTIONS



January 2026

5.0.

**Overview, scope and process
for program operator
Stichting MRPI®**



GENERAL PROGRAMME INSTRUCTIONS MRPI®-EPD 2026

January 2026 5.0.



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Tracking the versions of these General Instructions for the MRPI EPD programme

Version	Comments	Effect
4.0	Revision to include changes in standards	October 2021
5.0	Fundamental revision and extension	January 2026

1. Introduction

This document constitutes the General Programme Instructions of Stichting MRPI. This document is the main technical document of MRPI and forms the basis of the overall administration and operation of the MRPI programme for type III environmental declarations according to ISO 14025ⁱ and EN 15804ⁱⁱ.

MRPI is developing a program for broader type III environmental declarations according to ISO 14025 and for example EN 50693:2019. If case of program extension the GPI will be adopted accordingly.

1.1. EN 15804 amendment +A2

In November 2019 Amendment +A2 for EN 15804 was officially published. This new version differs significantly from the EN 15804 with Amendment +A1. One of the major updates is the introduction of a new methodology for the impact assessment. Particularly the use of fundamentally different indicators for some impact categories cause that Environmental Product Declarations (EPD's) under the new standard cannot be compared to those developed using the old standard.

In order to harmonize their approach and facilitate the transition to EN 15804 + A2, the EPD Program Operators (PO's) organized in the ECO Platform have agreed that PO's can continue to verify and publish EPD's following EN 15804 + A1 as long as the market requires it (and the standard is in force). PO's will constantly observe the market and coordinate sunset clauses for EN 15804 + A1.

Currently, the A2 standard has been widely adopted. Only the Dutch Environmental Database (NMD), for the moment, still requires results of environmental impact categories in accordance with the A1 impact assessment, supplemented with four additional toxicity indicators, in addition to the A2 impact indicators. The exact requirements are detailed in the "Bepalingsmethode"ⁱⁱⁱ. Specifically for the Dutch market and the NMD, Stichting MRPI continues to publish results according to both EN 15804 + A1 and EN 15804 + A2.

1.2. Types of MRPI certificates

Partly due to the various changes in EN 15804 and the "Bepalingsmethode", stichting MRPI issues four types of EPD certificates:

- MRPI EPD certificate;
- MRPI EPD+ certificate;
- MRPI NMD EPD certificate;
- MRPI customized certificate.

In chapter Declaration types4.1 the main attributes and differences of the various types of EPD are detailed. In the rest of this document these certificates are referred to as "the MRPI-certificate" and the

methodology as "EN 15804". When necessary the differences are explained. These program instructions are updated regularly to ensure market stability and also following the latest developments in standardization, LCA methodology etc.

Other documents related to these General Programme Instructions are:

- MRPI®-EPD verification protocol for signature, version 1.0 05-2025^{iv} This document contains the requirements for the verification of MRPI®-EPDs.
- MRPI Checklist Verification Report, version 04-2025^v
- MRPI®-EPD verification explanation, version 05-2025^{vi}
- Template-sjabloon MRPI®-EPD certificaat^{vii}. This is a spreadsheet that the LCA specialist fills out based on the LCA study. With the spreadsheet, MRPI® creates the EPD that is reviewed in draft form by the verifier and the manufacturer. Once everyone agrees, the EPD is published.
- Application form Recognized Verifier MRPI®, version 3.1^{viii}. This is the form to register as a recognized verifier at MRPI®.
- Recognition Scheme Verifiers MRPI® (RS), version 4.0^{ix}

1.3. Objective of the MRPI-EPD programme

Stichting MRPI has as a main objective to help organizations communicate the environmental performance of their building materials and products, in a credible, reliable, and understandable way. To do so, it offers a complete, LCA-based programme that allows companies and manufacturers to create and independently verified Type III Environmental Product Declarations (EPD's) for construction products and building-related products, in line with EN 15804.

With this, Stichting MRPI not only aims to support the construction industry in the documentation and declaration of the environmental sustainability of products according to legislation. This also assists purchasers and users with making informed comparisons between products, encourages improvement of environmental performance, and provides information for assessing the environmental impacts of products over their life cycle.

Stichting MRPI helps organizations/companies or manufacturers to broaden their market by providing EPD's according to international ECO Platform standards for an international market.

1.4. Scope and audience

The scope of an MRPI-EPD certificate can be both for the product of a single company or as the average product of companies in a specific sector within the Dutch manufacturing industry and geographical area: a "Sector MRPI-EPD certificate". Another aspect of the MRPI-EPD programme is simplicity and practical usefulness still complying with the requirements in EN 15804.

MRPI-EPD certificates are used as a means to communicate unambiguously and reliably environmental information on materials and products. Manufacturers communicate the information with an

environmental product declaration for building products, in fact an MRPI-EPD certificate. The MRPI-EPD certificate is an Environmental Product Declaration type III.

"EN 15804" uses a modular approach in communicating environmental product information. Three options for the scope of the declaration are possible:

1. Cradle-to-gate: scope is the production stage and the information Modules A1-A3 are declared. This is the minimum scope for the MRPI-EPD certificate;
2. Cradle-to-gate with options: information Modules A1-A3 are declared and 1 or more information Modules from the Construction Process stage (A4-A5), Use Stage (B1-B7), End-of-Life (C1-C4) and/or Module D;
3. Cradle-to-Grave: this is the most extensive scope where all modules are declared.

The target audience of MRPI-EPD certificates is business-to-business (B-to-B) communication as defined by the ECO Platform and EN 15942^x.

1.5. Identification of the programme operator

History Stichting MRPI

In the context of a sustainable built environment, the need for quantitative information on the environmental performance of construction products is becoming increasingly important. To fulfil this demand, the Dutch organization for the suppliers to the construction industry (NVTB) established the Stichting Milieu Relevante Product Informatie (MRPI) in 1999. Since that year, the organization worked on the MRPI system with support from the former Dutch government. Its goal has been to use MRPI as a means to communicate unambiguous and reliable environmental information on building materials and building products. Manufacturers communicate the information with an Environmental Product Declaration (EPD) for building products, in fact an MRPI certificate. The MRPI certificate is the common Dutch standard of an EPD type III.

ECO Platform

The objective of the ECO Platform is the development of verified environmental information of construction products and capital goods, in particular type III declarations. The ECO Platform coordinates the development of consistent EPD programs and stimulates the use of a common EPD methodology worldwide which will lead to mutual recognition between EPD programs^{xi}. MRPI is a Netherlands-based, world-wide operating program operator and member of the ECO Platform. A company interested in using the EPD across national borders may - for better recognition and acceptance – use the ECO EPD verified logo on the MRPI certificate.

Stichting MRPI is based in Amsterdam (Netherlands).

2. Involvement of interested parties

2.1. Structure of the MRPI-EPD organization

The MRPI-EPD system has an organizational structure that includes several parties all having separate and related tasks and responsibilities (see Figure 1). Important output of the whole process is the objective and unambiguous MRPI-EPD certificate.

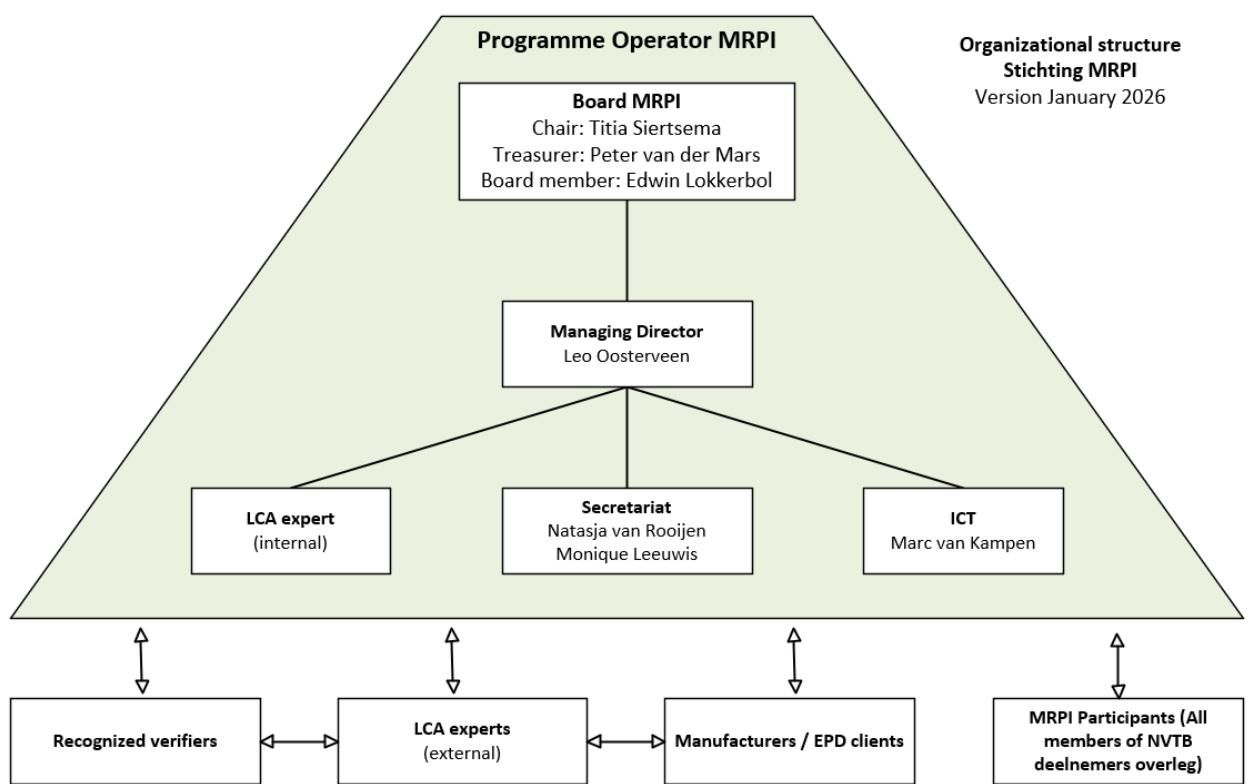


Figure 1 Organizational Structure Stichting MRPI with all parties involved.

The following paragraphs describe the roles of all parties involved.

2.2. Programme operator MRPI

Stichting MRPI is a non-profit organization based in Amsterdam (Netherlands) and is the Programme Operator. In the following paragraphs we explain the roles of the various internal parties.

MRPI Board

The board of Stichting MRPI consists of three or five members. Board members reflect, as much as possible, the material groups and stakeholders of the MRPI EPD Programme. New board members are appointed by the board itself. When a vacancy arises, the remaining board members appoint a successor by absolute majority within three months. A new board member takes the place of their predecessor in the rotation schedule for stepping down. The term of office is three years, with the possibility of reappointment. For the appointment, the board requests a non-binding nomination from the participants meeting.

The Board determines the policy and strategy of the Programme Operator. It approves the budget for Stichting MRPI and the Annual Program which describes all targets and activities for the upcoming year. The board determines the agenda for the yearly stakeholders meeting. All stakeholders (see also the paragraph about Other stakeholders

in chapter 2.3) involved in Stichting MRPI are invited for the meeting. In this meeting Stichting MRPI shows what has been done in the past year. The Board can also invite external parties if it wishes.

When LCA experts apply to become a "recognized verifier" the secretariat handles the application and presents the application to the Board. The board then decides if the application fulfils the demands and if the LCA expert can be appointed to act as "recognized verifier".

Managing Director

The Managing Director is appointed by the MRPI Board. Responsibilities include overall leadership, strategic direction, and effective operation of the EPD Program. This includes ensuring that program procedures, PCR development, EPD verification, and publication processes are carried out in accordance with applicable international standards and regulatory requirements.

The Managing Director oversees financial and business performance, maintains program accreditation and credibility, and ensures impartiality and transparency in all program activities. The role includes engagement with industry stakeholders, standards bodies, and regulatory organizations, representation of the program externally, and continuous improvement of systems, tools, and procedures. The Managing Director provides leadership to personnel, supports a culture of quality and integrity, and ensures risks related to compliance, data management, and environmental claims are appropriately managed.

LCA Expert

The internal LCA Expert ensures the smooth operation and quality of the EPD programme from a technical standpoint. The LCA Expert contributes to programme improvement by advising on workflows, templates, and guidance documents, and keeps the programme aligned, and up to date with developments in standards, regulations, and sector-specific requirements. Their work ensures the EPD programme delivers credible, standardized, and transparent environmental product declarations to all stakeholders.

Secretariat

The programme operator has a Secretariat for the overall management of the MRPI-EPD system. Tasks of the secretariat are:

- Programme maintenance:
 - to develop, prepare and communicate the General Programme Instructions;
 - to ensure that General Programme Instructions are followed;
 - to periodically review the General Programme Instructions, and monitor changes in procedures and documents and modify the programme and the General Programme Instructions if necessary;
 - to ensure appropriate consultations for maintaining credibility of the programme;
 - to ensure the consistency of transparent verification procedures for verification of LCA and verification of MRPI-EPD certificates;
 - to guide an organization in the selection procedure of competent independent verifiers (if requested);
 - to establish procedures to avoid misuse of the programme and information in the MRPI-EPD certificates.
- EPD publication and database maintenance:
 - to manage the website of the programme (www.mrpi.nl);
 - to publish all MRPI-EPD certificates registered in the programme;
- Stakeholder interactions:
 - to issue a newsletter on a regular basis and keep a list of subscribers to the newsletter;
 - to inform the public of any updates to the General Programme Instructions on the MRPI website;
 - to manage membership of the ECO Platform and implement latest procedures;
 - to organise a yearly meeting for all recognized verifiers to communicate latest developments of the programme;
 - to facilitate participation and involvement of interested parties.

ICT

Stichting MRPI is in the process to significantly change the current process for requesting and generating Environmental Product Declarations (EPD's). By streamlining and (partially) automating the process, significant time savings can be achieved and data quality can be improved. As such, the role of the ICT department will grow to be of more importance than it was in the past.

The ICT department supports the programme operator by ensuring all digital systems used to create, verify, and publish EPD's run smoothly and securely. This includes:

- managing the MRPI platform for requesting, generating, and publishing EPD's,
- ensuring compliance with (digital) requirements
- maintaining accurate and traceable information flows
- protecting sensitive data through strong cybersecurity measures
- providing technical support to staff, verifiers, and clients.

By maintaining reliable and efficient digital infrastructure, the ICT department will enable the timely and credible publication of high-quality EPDs. For more information on the functionalities, data security etc. see chapter 5.

Impartiality & independence

Both the MRPI Board and the secretariat understand the importance of and are committed to impartiality in all activities. To ensure impartiality and independence the following is implemented:

- Financial ownership: Stichting MRPI is a non-profit organization and as such has no commercial incentives that could prevent the consistent impartial operation of the Programme.
- Top management selection and structure: See the paragraph about the MRPI Board.
- Relationships with external organisations: All relationships follow the principles and preconditions as described in these General Program Guidelines.

Consultancy and advocacy: All MRPI activities are focused on the advocacy and communication of unambiguous and reliable environmental information on products. No commercial consultancy services are provided.

2.3. Other stakeholders

Recognized Verifiers

Only Recognized Verifiers may carry out MRPI-EPD verification. Stichting MRPI provides an up-to-date list at www.mrpi.nl with all recognized verifiers. For the procedure on how to become a Recognized Verifier, please see chapter 6.1.

LCA experts

LCA Experts play a central role in supporting the EPD program by conducting Life Cycle Assessments (LCA's) for products, ensuring compliance with all relevant standards. The LCA study forms the basis for every EPD, with the resulting EPD certificate derived from and prepared using the data from the LCA report. In larger organizations, LCA studies may be conducted by specialized departments, but in most cases, they are performed by experienced external LCA Experts.

These experts provide technical guidance on methodological choices, data quality, impact assessment, and allocation. They are expected to have strong knowledge of LCA methodology and software, experience with product-specific EPD's, and the ability to interpret and communicate results clearly to Manufacturers/EPD clients, Recognized Verifiers, and MRPI as Programme Operator. External LCA Experts also advise the MRPI Board on technical matters and participate in regular meetings with the VLCA to stay updated on legislation, regulations, and developments relevant to LCA practice.

All MRPI Recognized Verifiers have extensive experience conducting LCA studies and can perform an LCA study on request, with the resulting study always reviewed by another verifier to ensure accuracy and compliance.

The VLCA (Association for LCA's in Construction) is the professional association for LCA Experts specializing in construction products. Its members have extensive experience in conducting LCA studies and, in some cases, also act as Recognized Verifiers for MRPI. For a complete overview of LCA Experts in the Netherlands, it is recommended to visit the [VLCA¹ website](#).

Manufacturers / EPD Clients

The client can be an organization/producer or manufacturer and shall carry out the following tasks:

- choose to develop a MRPI-EPD+ certificate, an MRPI-EPD certificate, an MRPI NMD EPD certificate, or a MRPI customized certificate;
- collect LCA information and compile a dossier for the recognized verifier;
- the dossier consists of an LCA project report and the MRPI-EPD certificate of choice;
- the LCA project report contains at least the elements stated in EN 15804 chapter 8.2;
- choose a MRPI recognized verifier from the list provided by Stichting MRPI at www.mrpi.nl;
- accept the terms and conditions of Stichting MRPI;
- timely pay registration and annual fees.

See Chapter 4.1 of this document for an explanation in detail of the differences between a MRPI-EPD+ certificate and an MRPI-EPD certificate.

MRPI Participants

The participants consist of all members of the NVTB participants meeting. NVTB is the Dutch organization for the suppliers to the construction industry. In the participants meetings there is coordination with sector organizations in the building materials supply chain. These involve the organizations for steel, concrete, wood etc. Also, in a yearly congress and hackathon, the participants discuss the development of the Programme and strategy, as well as developments in the field with Stichting MRPI.

2.4. Updates and communication

These program instructions are updated regularly to ensure market stability and also following the latest developments in standardization, the general Life Cycle Assessment (LCA) methodology etc. Also, to ensure the quality of the MRPI EPD's, changes of requirements defined in the ECO Platform Standards, and the "Bepalingsmethode" are incorporated in the MRPI documents and procedures in a timely manner. Twice per year checks are performed on updates to be incorporated. New versions of the ECO Platform Standards are implemented in the MRPI documents within six months of the date of

¹ The "Vereniging voor LCA's in de bouw", visit <https://www.vlca.nl/> for more information.

release. No later than twelve months after the date of release of a new version, new MRPI EPD's shall adhere to the new version of the ECO Platform Standards.

Any changes are communicated to all stakeholders, including the recognized verifiers. Modes of communication used are:

- the MRPI website (www.mrpi.nl);
- a newsletter;
- a meeting for all recognized verifiers, twice per year;
- participants meetings, twice per year;
- a yearly congress, (see the [MRPI YouTube channel](#) for the video).

3. PCR (Product Category Rules)

A PCR (Product Category Rules) document defines the specific technical conditions, requirements and calculation rules which are to be applied when preparing an Environmental Product Declaration for a product. Stichting MRPI refers to three types of PCR documents:

1. Core PCR: EN 15804 - "Sustainability of construction works - Environmental product declarations - Core rules for the product category of construction products".
2. The "Bepalingsmethode", the Dutch PCR based on the EN 15804, and published by the Nationale Milieudatabase (NMD), including any valid amendments.
3. Complementary PCR (cPCR) documents for product categories.

All EPD's published through Stichting MRPI shall comply with the requirements in EN 15804. If a relevant CEN cPCR exists, it is mandatory to use this, in the development of an EPD. If a relevant NL PCR exists and the EPD must comply with the "bepalingsmethode" it is also mandatory to use this. It is however not mandatory to use a cPCR from partners with whom there is a mutual recognition (MR) agreement, or other cPCR's that meet the rules and procedures of Stichting MRPI. It is recommended to support modelling decisions, if they are not in conflict with the rules and procedures of Stichting MRPI as described in these General Programme Instructions and technical rules and guidelines. Therefore, the verifiers may request a brief explanation of the reason why a relevant cPCR from the MR has not been used.

If there is no cPCR available, EPD's for construction products are developed only according to EN 15804. An EPD shall always state according to which standards, PCR and cPCR the EPD was made.

Future complementary PCR documentation that will be developed under a different core PCR has to follow the procedures as explained in 3.3.

3.1. The "Bepalingsmethode"

For the Dutch market the methodology used is the "Bepalingsmethode", including any valid amendments. The "Bepalingsmethode" is based on EN15804 but contains some specific rules. In addition to EN 15804, the "Bepalingsmethode" specifies:

- requirements for establishing standard scenarios where possible and necessary for the Dutch context;
- requirements for establishing standard values of background processes where possible and necessary for the Dutch context;
- requirements for determining the reference life span;
- requirements for preparing the project file for the assessment procedure.

3.2. Complementary PCR (cPCR)

MRPI keeps an overview of (under development) European PCR's. The overview includes both European determined PCR's, and in initiatives for standard development within CEN/TC 350/WG 3 for information purposes.

The "Bepalingsmethode" also refers to normative NL c-PCR. The owner of the "Bepalingsmethode" has set rules for these NL cPCR and is also responsible for publication. For the preparation and management of a cPCR, the NMD Foundation has developed a Protocol with which an initiator is guided and the NMD Foundation provides clarity about the criteria for declaring cPCR's applicable. This protocol monitors the mutual consistency within and between the cPCR's for different material and product groups.

3.3. Procedure for development and maintenance of PCR

The international standard ISO 14025 defines the basic procedural requirements for the development of a PCR document and the carrying out of a PCR review. Complementary PCR documents are developed by a PCR group of relevant parties from the industry and LCA specialists.

Product subcategories are defined by MRPI, and basically, they will be in accordance with the harmonised technical specifications (harmonised standards and European Assessment Documents) under the Construction Products Regulation ((EU) 2024/3110) for the scope of the 15804 PCR. Future cPCR that can be developed under other PCR will also comply with the ISO 14025 standard and therefore follow the same procedure.

Throughout the Product Category Rules (PCR) development stage MRPI will strive to achieve consensus in the process. MRPI shall ensure that the development of PCR is open for consultation for interested parties including industry, government agencies, trade organisations, manufacturers, LCA consultants, sustainability experts and academic organisations. The period of consultation shall not be

less than two months. Relevant documents will be published on at least the MRPI website and interested parties will be notified.

Industry or other group seeking development of PCR will notify MRPI of intent to develop a PCR, and will provide clear reasons as to why existing PCR cannot be used. MRPI will assess the need for the PCR in consultation with international programmes including Eco Platform. If agreed that new PCR is required, MRPI appoint a moderator who will ensure adequate LCA technical expertise available within the PCR group. The PCR group is registered and published by MRPI, stating the expected dates for the open consultation procedure and publication, respectively.

The cPCR is developed according to the ISO 14040 series and ISO supplemented with a relevant scope Core PCR, such as EN 15804 for construction products.

The cPCR complies with these General Programme Instructions and Technical Rules and Guidelines.

The LCA based data, together with additional environmental information prescribed by the cPCR, give a description of significant product-related environmental considerations. The final draft cPCR is reviewed by the MRPI review panel that consists of a changing selection of three MRPI verifiers. For the review a protocol will be made available by MRPI². The final, approved, cPCR document is published at MRPI.

An approved complementary PCR document is valid for 5 years. Hereafter the PCR group shall re-evaluate the document and decide on revisions, if any, of the document.

It is the responsibility of MRPI to address the necessary revisions of a complementary PCR document during its period of validity. Necessary revisions include updates in case of discrepancies with the ECO Platform standards, that are expected to be revised annually. The PCR group is responsible for the necessary revision, before publication the document has to be approved by the MRPI review panel.

4. Development of EPD's

To be able to fulfil high market expectations for a number of practical applications EPD certificates have to comply with specific and strict methodological prerequisites. Depending on the specific type of EPD, the EPD certificate shall be in compliance with EN 15804 (procedural and methodological) and the EPD certificate shall reflect the underlying LCA report, thus ensuring a minimum control on validity and plausibility of LCI-data and technical scenarios. An EPD certificate includes the mandatory subjects stated in EN 15804.

² At the moment no cPCR request have been in procedure so no MRPI specific protocol is available.

An EPD certificate may include additional information, as defined in ISO 14025 and EN 15804, based on national requirements or specific market needs. Additional information shall also be verified if included in the EPD certificates.

4.1. Declaration types

There are four types of MRPI certificates:

- MRPI-EPD certificate: A certificate for the European market in accordance with ECO Platform guidelines.
- MRPI-EPD+ certificate: A certificate for the Dutch market in accordance with the Nationale Milieudatabase (NMD) PCR, which also complies with ECO Platform guidelines.
- MRPI-NMD EPD certificate: Solely publish a certificate in accordance with the NMD PCR.
- MRPI customized certificate: Other types of standards can be followed e.g. non-construction products. This constitutes the creation of a tailor-made EPD, for which the reviewer bears responsibility that any applicable standard is adhered to, including the layout and content of the EPD.

The main attributes of the MRPI-EPD+ and MRPI-NMD certificates are:

- The data of the MRPI-EPD+ and MRPI-NMD EPD certificates can be included in the Dutch Environmental Database, although this is not required;
- The MRPI-EPD+ and MRPI-NMD EPD certificates can only be verified by a reviewer that is also an appointed reviewer at Stichting NMD;
- The MRPI-EPD+ and MRPI-NMD EPD certificates shall be in alignment with the currently applicable version of the "Bepalingsmethode", the Dutch PCR published by the Nationale Milieudatabase (NMD), including any valid amendments;
- The MRPI-EPD+ and MRPI-NMD EPD certificates contain both the A2 and A1 environmental impact assessment indicators, the latter set supplemented with four additional toxicity indicators (HTP, FAETP, MAETP, TETP);
- The MRPI-EPD+ and MRPI-NMD EPD certificates include a table declaring the environmental impacts per functional or declared unit, which shall also show the Environmental Cost Indicator based on the A1 indicators and the indicator ADPF (= Abiotic Depletion Potential for fossil resources) expressed in kg Sb-eq.

The validity of the MRPI-EPD certificate is 5 years from publication.

4.2. The MRPI EPD Production process

For the production of MRPI EPD's the following process is followed:

Flow diagram MRPI EPD production Process
Version 26 January 2026

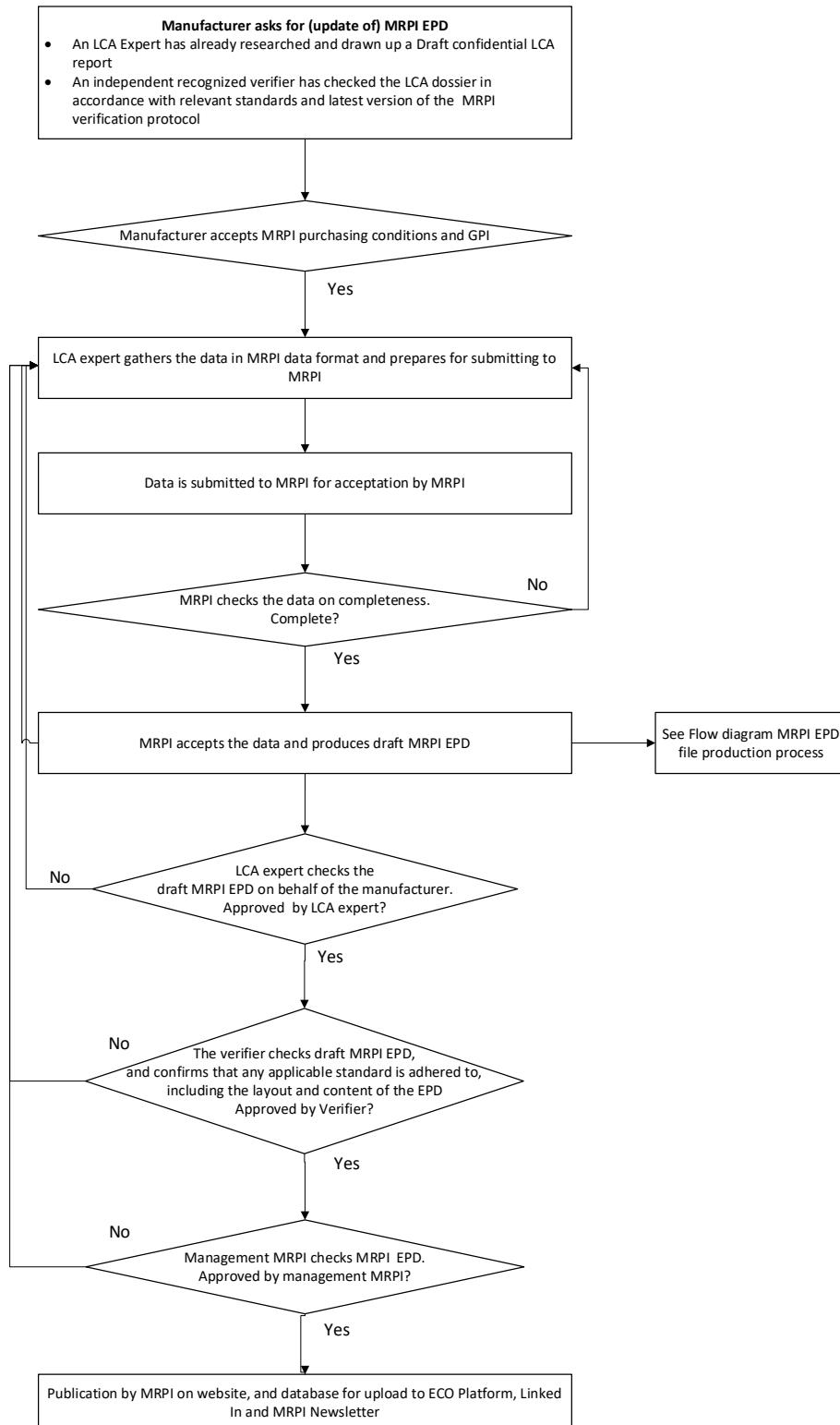


Figure 2 The MRPI EPD Production process

In the current situation, the processes regarding MRPI EPD's consist of several manual steps with limited automatic data validation. Stichting MRPI plans to significantly change the current process for requesting and generating Environmental Product Declarations (EPD's). By streamlining and (partially) automating the process, significant time savings can be achieved and data quality can be improved.

The future situation is described in the following paragraphs.

4.3. Future situation

MRPI intends to develop a customized application, the "MRPI platform", for requesting, generating, and publishing EPD's. The new software application should be capable of processing large numbers of EPD's annually.

The application will broadly offer the following functionalities:

- An online form for registering new EPD applications
- Modifying existing EPD applications
- Automatic validation of EPD applications
- Generating EPD certificates (PDF documents)
- Reviewing and approving/rejecting EPD certificates
- Publishing EPD certificates on the website
- Publishing EPD data via API
- Automated processing of EPD applications via API

To realize this, the following is being developed.

DTAP (Development, Test, Acceptance, Production)

Two environments will be set-up for the application: a test environment and a production environment. Each environment is linked to its own container hosted in a secure cloud. Each container has its own resources (internal memory, storage, CPU) that are completely isolated from other environments.

Data Storage and Backups

Each application environment has its own database and file system. The location of the database depends on the cloud region to which the environment is linked. Backups of the database and files are automatically created daily (nightly) and can be requested at any time by application administrators in the software Portal. Backups are always stored in two separate locations.

Access to the database is only possible via the application front-end or the software client API's. For external applications that need access to the database, datasets can be published via an API. These datasets can then be retrieved over the internet.

Authentication

Users log in with a local account, meaning an account that exists only within the application. The username is always their email address, and the user can choose their own password when registering a new account. Existing users can reset their password on the login page. Logging in is done via two-step verification (MFA).

Data Security

Access to data in the platform is determined firstly by the user's role and secondly by the company to which the user is associated. The user's role determines the Create, Read, Update, and Delete permissions. This way, a user only sees customer-specific data associated with the company linked to their account.

The platform will go live in the course of 2026. At that point, a new EPD production process will be followed. See Figure 3.

Flow diagram MRPI EPD production Process – future situation
Version 26 January 2026

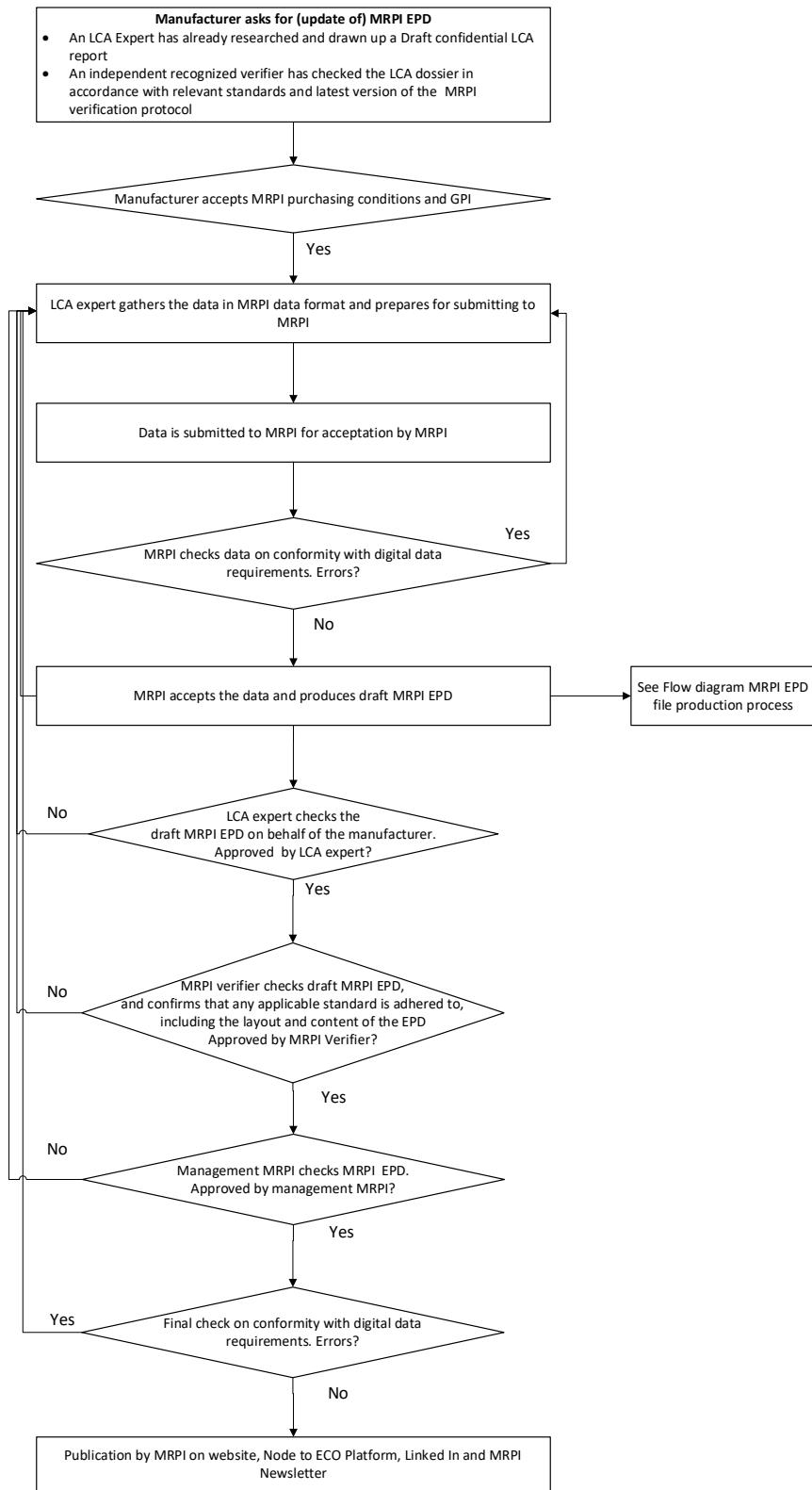


Figure 3 The MRPI EPD Production process - future situation

5. Data management and confidentiality

5.1. Document control

Documents relating to the correct operation of the EPD programme shall, of course, be controlled. To this end procedures are established, implemented, and maintained with respect to the documents related to the MRPI Programme, and the documents related to the MRPI EPD's:

- a. To approve documents for adequacy before they are issued;
- b. To review and, if necessary, update documents, and re-approve them (also see the MRPI EPD Production process as described in chapter 4.2);
- c. To ensure that changes and the current revision status of documents are identified;
- d. To ensure that relevant versions of the applicable documents are available;
- e. To ensure that documents remain legible and easily identifiable;
- f. To prevent the inadvertent use of expired documents and apply appropriate identification when they are retained for any reason.

All normative documents are subject to periodic revisions, which may lead to overlaps between expiry of an old version and publication of the new revision, i.e. overlaps between two published versions. This is however strived to be avoided by Stichting MRPI internally. Implementation periods of changes in specific documents are stated in the documents, respectively.

5.2. Management of EPD data and documentation

The organization/producer or manufacturer compiles a project dossier which exists of a LCA project report and the MRPI-EPD certificate. The manufacturer has to store this dossier at least 1 year after the validity of the MRPI-EPD certificate has ended. In total a minimum of $5 + 1 = 6$ years. The project dossier stays with the manufacturer and shall be available for inspection by an independent third party appointed by Stichting MRPI.

5.3. Data confidentiality

Business data could be of confidential nature because of competitive business aspects, intellectual property rights or similar legal restrictions. Such confidential data is not made public as the declaration typically only provides data aggregated over full or relevant portions of the life cycle. Therefore, business data identified as confidential and provided during verification process shall be kept confidential. Hence, MRPI recognized verifiers shall not disseminate or otherwise retain for use, without the permission of the organization, any information disclosed to them during the course of the review work.

Stichting MRPI receives the project dossier with the LCA report and the MRPI-EPD certificate. Further the MRPI recognized verifier provides Stichting MRPI the signed Verification checklist (Part A and Part

B). Stichting MRPI publishes the MRPI-EPD certificate and the other documents stay confidential. Only in case of an appeal Procedure information can be disclosed or when the manufacturer agrees.

6. Independent verification

6.1. Becoming a recognized verifier

The document "Recognition Scheme Verifiers MRPI®"³ explains the exact procedure on how to become a recognized verifier. The MRPI Recognized Verifier shall have the following competencies:

- knowledge of the guidelines and standards referred to in the Recognition Scheme (Clause 1);
- knowledge of Dutch building practice and the production of building materials;
- Three years at the minimum of experience as LCA practitioner OR have at least completed 3 LCA studies for (building) products, building elements, installations, buildings and/or GWW works;
- If experience is missing the agency shall inform Stichting MRPI that the LCA practitioner has coaching or supervision by a more experienced LCA practitioner in the company;
- The appointed MRPI Recognized Verifiers by the company shall attend the verifiers meeting at Stichting MRPI held twice per year, to get knowledge on the latest developments in LCA standards and guidelines.

The application for becoming a recognized verifier has to be delivered to the Secretariat. When the application is complete the Board will decide if the applicant can become a recognized verifier. In case of complaints regarding the appointment en registration procedure or the outcome of this process, arbitration is possible. Please see chapter 7.

6.2. Verification of an EPD

The MRPI Verifier shall be independent of the party for which it carries out the assessment. The MRPI Verifier shall not be involved in the execution of the LCA study that the verifier has to assess. Further it is not allowed that the MRPI verifier and the executor, of the LCA study under assessment, are in the same company.

Independent verifiers shall review MRPI-EPD certificates based on a dossier from the organization/producer/manufacturer. The dossier consists of:

- the LCA project report;
- the MRPI-EPD certificate.

The verifier shall fill in the latest version of the "Checklist Verification Report" and submits this together with the MRPI-EPD certificate to the Programme Operator. However, if the programme operator

³ Visit <https://www.mrpi.nl/epd-certificaten/documenten-toetsers/> for the most recent version.

determines, based on the verification report, that the data supporting the Type III environmental declaration are inadequate, the declaration shall not be published.

The document "MRPI® -EPD verification protocol for signature"⁴ explains the procedure for verifying MRPI-EPD certificates in detail and provides the "Checklist Verification Report" and the form for a blank MRPI-EPD certificate. Also see Figure 2.

7. Feedback or complaints & continuous improvement

This chapter outlines the complaint procedure for the MRPI program, in accordance with the requirements for an EPD Programme Operator under ECO Platform. This procedure ensures that all complaints, comments, and questions from stakeholders (verifiers, LCA practitioners, competitors, users of EPDs, etc.) are handled in a transparent, fair, and timely manner.

This procedure applies to all complaints, comments, and questions related to MRPI's Environmental Product Declarations (EPDs), verification processes, and general programme operations.

7.1. Submission of complaints

Complaints can be submitted in writing via email, by filling in the form on the MRPI website, or by phone. The complaint shall include:

- Name and contact details of the complainant.
- Type of complaint: EPD content, MRPI official statements and documents, MRPI procedures and invoices, LCA experts, Verifiers or Other.
- Clear description of the issue:
 - Complaint about EPD Content:
 - EPD number
 - Description of type (method error, layout, false claim, etc.)
 - Description of how this violates relevant standards
 - Official Documents (MRPI verification protocol, GPI, website, etc.)
 - Reference to the document, section or page number
 - Possibly reference to violation of relevant standards
 - Other types of complaints: Include a careful description of the complaint's content with concrete examples and relevant supporting documentation.
- Expected resolution (if applicable).

For complaints and inquiries, please contact: **MRPI Programme Secretariat**

Email: contact@mrpi.nl

Phone: +31 (0)30-7509983

Website: www.mrpi.nl

⁴ Visit <https://www.mrpi.nl/epd-certificaten/documenten/> for the most recent version.

7.2. Complaint handling process

Acknowledgment:

- MRPI will acknowledge receipt of the complaint within 5 business days, outside of vacation periods.
- The complainant will be informed about the process and estimated resolution time.

Investigation and follow-up:

- The complaint will be reviewed by the MRPI Programme Secretariat and relevant experts within 15 business days.
- Additional information may be requested from the complainant.
- The EPD owner is contacted and informed about any discrepancies with authoritative or technical documents.
- If necessary, an independent technical review will be conducted.

Resolution:

- A resolution will be proposed within 30 business days of receipt of the complaint.
- The complainant will receive a written response, including the decision, actions taken, and rationale.

Dispute resolution and arbitration:

- If the complainant disagrees with the resolution, they may request a review by the MRPI Appeals Committee. The size and composition of the Appeals Committee may vary from case to case, depending on the expertise required. The members of the Appeals Committee shall not have been involved in taking the decision against which the appeal is being brought.
- The Committee's decision is final and binding.

For a schematic overview of the MRPI complaint handling process, see Figure 4 on the next page.

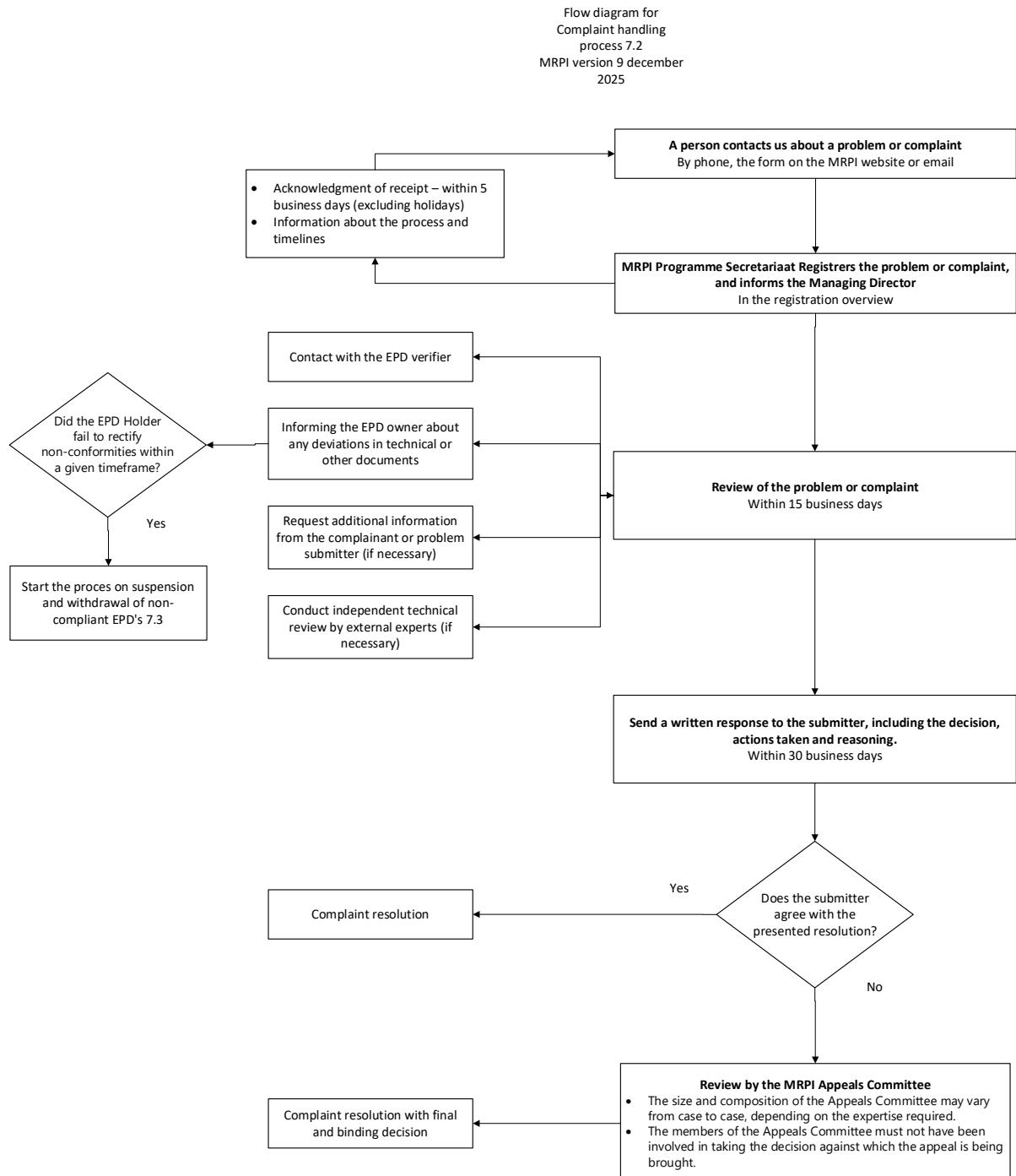


Figure 4 The MRPI complaint handling process

7.3. Suspension and withdrawal of Non-Compliant EPD's

An EPD may be subject to suspension or withdrawal if:

- It is found to contain false or misleading information.
- The verification process did not meet MRPI and ECO Platform standards.
- The holder fails to rectify non-conformities within a given timeframe.

Procedure for Suspension:

- A notice of suspension will be issued, and the EPD holder will be given 30 days to correct non-conformities.
- The EPD will be temporarily removed from the MRPI database if the issue is not resolved.

Procedure for Withdrawal:

- If the non-conformity is not corrected within 60 days, the EPD will be permanently withdrawn.
- The EPD holder will be notified in writing, with reasons for withdrawal.
- The withdrawal decision can be appealed following the dispute resolution procedure.

Please Figure 5 on the next page for a schematic overview of the MRPI process for suspension and withdrawal of Non-Compliant EPD's.

Flow diagram for the proces on
suspension and withdrawal of non-
compliant EPD's 7.3
MRPI version 9 december 2025

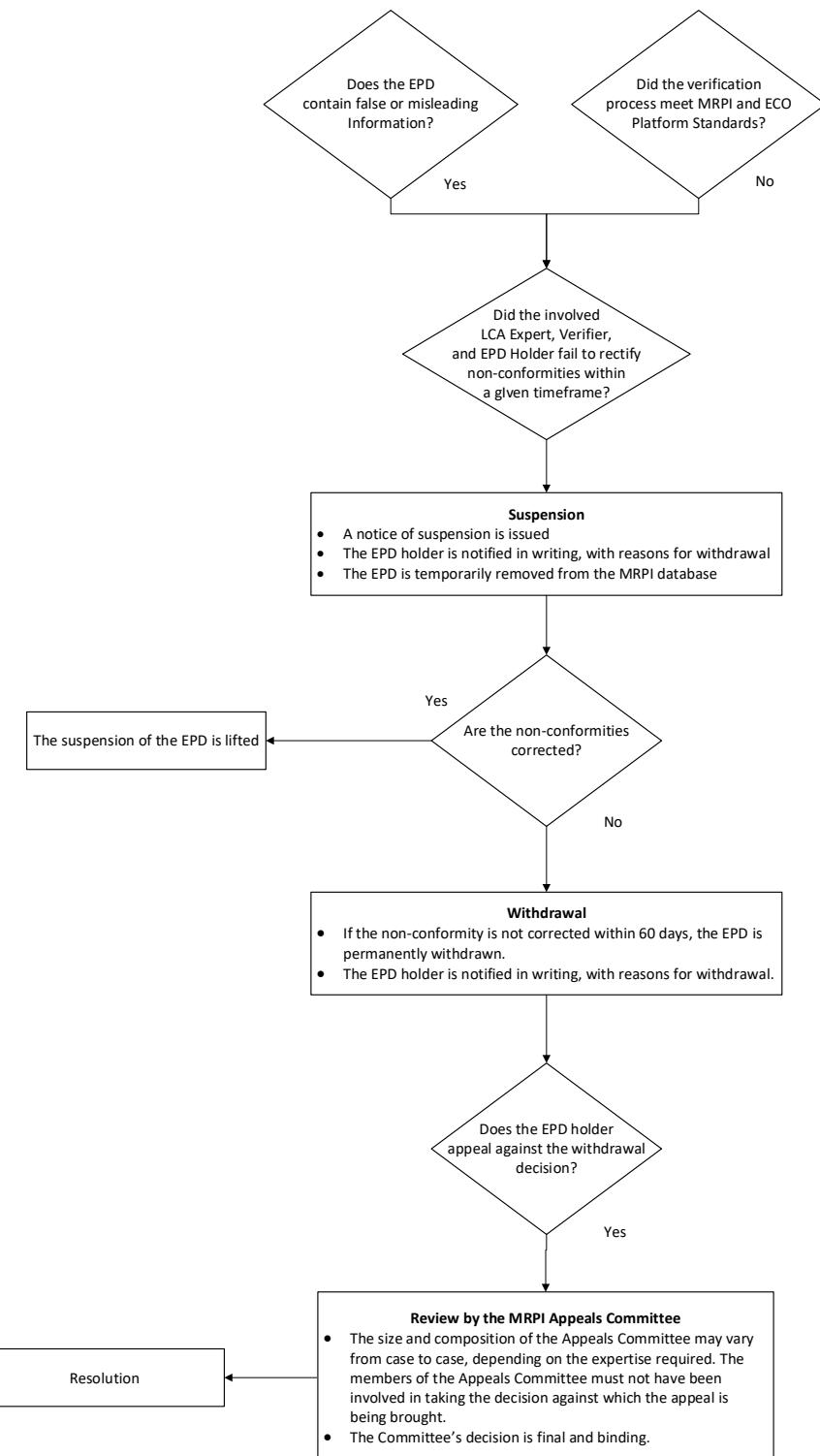


Figure 5 The MRPI process for suspension and withdrawal of Non-Compliant EPD's

7.4. Management review and continuous improvement

All complaints are reviewed annually by the MRPI Management Board. Lessons learned are used to improve MRPI processes and policies.

As part of the continuous improvement efforts, an internal audit is conducted twice a year. This audit periodically assesses whether all procedures are being followed and have the desired effect or whether MRPI processes and policies need improvement. Also, these program instructions are updated regularly to ensure market stability and also following the latest developments in standardization, LCA methodology, and any updates in the ECO Platform guidelines etc.

8. Resources and fees

Stichting MRPI is a non-profit organization and has no commercial intentions. The resources for programme development and operation programme are provided by the stakeholders who support a solid MRPI-EPD programme for the Dutch building industry. Other financing comes from the yearly contribution of the holders of MRPI-EPD certificates and from new developed MRPI-EPD certificates. Recognized verifiers also pay an annual fee to Stichting MRPI.

The up-to-date fees for becoming a stakeholder, yearly contributions for certificates and development of new certificates are published at www.mrpi.nl.

9. Abbreviations

ADPF	Abiotic Depletion Potential for fossil resources
API	Application Programming Interface
B-to-B	Business-to-business: Communication between organisations and/or professional actors.
B-to-C	Business-to-consumer: Communication between an organisation or professional actor and a consumer.
cPCR	Complementary PCR: A PCR that provides further rules and guidance for products on specific subcategories
CPU	Central Processing Unit
DTAP	Development, Test, Acceptance, Production
EPD	Environmental Product Declaration
FAETP	Freshwater aquatic ecotoxicity potential
HTP	Human toxicity potential
LCA	(Environmental) Life Cycle Assessment
LCI	Life Cycle Inventory (analysis)
MAETP	Marine aquatic ecotoxicity potential
MFA	Multi factor Authentication
MR	mutual recognition

MRPI	Milieu Relevante Product Informatie
NMD	Nationale Milieu Database
PCR	Product Category Rules: specific product category rules and in accordance with EN 15804
PO	Program Operator
TETP	Terrestrial ecotoxicity potential
VLCA	Vereniging voor LCA's in de bouw

10. References

ⁱ NEN-EN-ISO 14025:2010, environmental labels and declarations - Type III environmental declarations - Principles and procedures

ⁱⁱ NEN-EN 15804:2012+A2:2019, Sustainability of construction works - Environmental product declarations - Core rules for the product category of construction products, NEN Delft, 2019.

ⁱⁱⁱ Bepalingsmethode "Milieuprestatie Gebouwen en GWW-Bouwwerken" Versie 2.01.2 November Januari 20142025. Stichting Nationale Milieudatabase, Den Haag 2025.

^{iv} MRPI®-EPD Verification Protocol. Stichting MRPI® Den Haag, <https://www.mrpi.nl/epd-certificaten/documenten/>

^v MRPI Checklist Verification Report, version 04-2025, <https://www.mrpi.nl/epd-certificaten/documenten/>

^{vi} MRPI®-EPD verification explanation, version 05-2025, <https://www.mrpi.nl/epd-certificaten/documenten/>

^{vii} Template-sjabloon MRPI®-EPD certificaat, for the latest version, see <https://www.mrpi.nl/epd-certificaten/documenten/>

^{viii} Application form Recognized Verifier MRPI®, version 3.1, <https://www.mrpi.nl/epd-certificaten/documenten/>

^{ix} Recognition Scheme Verifiers MRPI®. Stichting MRPI® Den Haag, <https://www.mrpi.nl/epd-certificaten/documenten-toetsers/>

^x NEN-EN 15942:2021 Sustainability of construction works - Environmental product declarations Communication format business-to-business. NEN Delft, 2021

^{xi} <https://www.eco-platform.org/>