Product-Category Rules (PCR)

for Preparing an Environmental Product Declaration (EPD) for

Paints

PCR 2012:1.0

UFON NANO-CHEMICAL CORP.

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1. General Information

This document is to be used as the product category rules (PCR) for the manufacturing of paints ("product"). This PCR is applicable to paints with the HS Codes of 3208, 3209, 3210, including paints, conductive paints (containing copper powder, silver powder or nickel powder only), other paints (including powder coating), varnishes, water-based pigments for leather processing and other paints. The requirements specified in this PCR are intended to be used for EPDs certified in accordance with ISO 14025 standard. This document shall be valid until December 31st, 2015.

This PCR was prepared by the UFON NANO-CHEMICAL CORP. Representatives from major Taiwanese manufacturers of similar products and stakeholders were invited to the open consultation meeting on October 29th, 2012, to participate in the discussion and review of this PCR. The Environment and Development Foundation (EDF) then reviewed and approved this PCR.

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2. Company and product description

The EPD shall include information about the manufacturing company/organization. The information may include manufacturing process related information, and environmental related information, such as the environmental management system information. The information may also include special issues which the company/organization would like to emphasize, such as the products meeting certain environmental criteria, or environmental safety and health related information.

This PCR is applicable to both business-to-consumer/customer (B2C) or business-to-business (B2B) communications. While conducting certification of environmental impact assessment, the inventory of products also includes the raw materials and packaging materials.

2.1 Product group function

The paint is a liquid, paste or powder form product that can form a film when applied to the substrate, and can exhibit the protective, decorative and other special properties as follows:

- 1. Protective: the film on the substrate can form a protective layer with anti-corrosion, waterproof, anti-oil, anti-chemical, lightproof, and temperature resistance properties; and can prevent or delay metal corrosion, wood rotting, or cement weathering damage, to extend the useful life of the coated materials.
- 2. Decorative features: with the application of paints onto the substrate, the substrate's color, luster, pattern, and smoothness can be enhanced.
- 3. Other features: The paints can also offer marking, stain resistant, insulation, fire protection and other special functions (e.g., anti-bacterial, mold resistant, heat insulation, heat dissipation, and biocidal) to the coated substrate.

2.2 Product components

The paints' main components/constituents include:

- Main materials: binders (e.g., natural resins, alkyd resins, acrylic resins, chlorinated rubber resins, epoxy resins, polyester-based resins, acrylic, vinyl polymers, other synthetic polymers, or chemically modified natural polymers), solvents (e.g., water-based solvent, non-water-based solvents, etc.), pigments, fillers.
- Secondary materials: additives (e.g., defoamers, wetting agents, plasticizers, fungicides, preservatives, water-based additives).
- Packaging materials: plastic barrels, metal pails, storage tanks, high pressure vessels, interior bags, labels, shrink-wrap film, cardboard boxes, tapes, wraps, etc.

The data quality requirements for the main components/materials are described in Section 9 on calculation rules and data quality requirements. The EPD shall also include the secondary materials and packaging materials of the product, but their data quality requirements are different from those of the main components/constituents.

2.3 Product technical description

The product technical description part of the EPD may include but not limited to the following information:

- Product name and color
- Product ingredients/constituents
- Capacity
- Shelf life
- Applications
- Application methods

3. List of materials and chemical substances

The contents of the following materials and substances in the product shall be declared:

- All materials of the product (excluding packaging material) with weight ratio (material weight/product weight (excluding packaging)) ≥ 1%;
- All materials of the packaging with weight ratio (material weight/packaging weight) $\geq 1\%$;
- All substances/materials in the product restricted/regulated by legal, customer and environmental requirements, for example, VOCs, formaldehyde, heavy metals, indoor air quality.

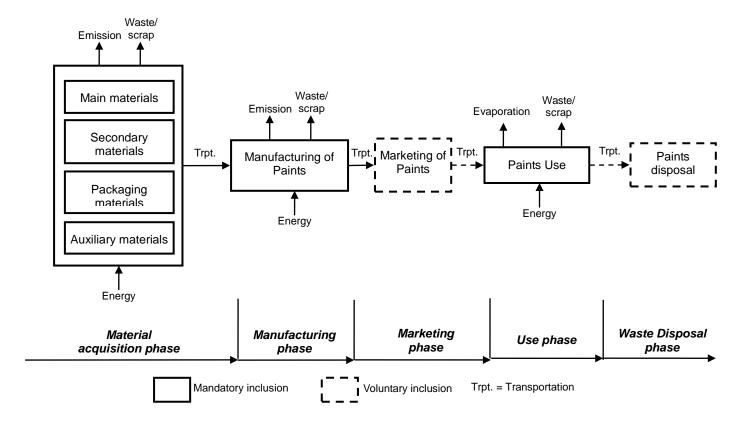
The declaration of no heavy metals or hazardous substances may only be made when appropriate evidences are available (for example, test reports from accredited laboratories/testing facilities). The following organizations may provide accreditation for testing facilities: Taiwan Accreditation Foundation (TAF), (Asia Pacific Laboratory Accreditation Cooperation (APLAC), International Laboratory Accreditation Cooperation (ILAC) or ILAC Mutual Recognition Arrangement (ILAC MRA). For definitions of testing methodology and confirmations of regulated hazardous substances based on the accredited laboratories' product testing methods, please refer to IEC 62321 Standard.

4. Declared unit

The declared unit is one (1) unit of products as marketed on the market (e.g., one can, one pail, one bucket, one set), with the indication of product volume (e.g., gal, ml, l) or product weight (e.g., g, kg, tonne).

5. System boundaries

The main system boundaries for the declared product system are presented as follows:



Note: Auxiliary materials mean materials which are in contact with the product during the manufacturing process, but do not appear in the product as product components/ingredients. For example, chemical reagents, solvent wipe.

Figure 1 System boundary of the product system

As noted in Figure 1 above, the life cycle of the product covers five life cycle stages: raw material acquisition, product manufacturing, distribution, product use and waste disposal. The data quality requirements for the main materials are described in Section 9 on calculation rules and data quality requirements.

Raw Materials Acquisition Stage

The LCA shall include information for the following unit processes:

- Relevant processes for the manufacturing of main materials;
- Relevant processes for the manufacturing of secondary materials;
- Relevant processes for the manufacturing of packaging materials;
- Relevant processes for the manufacturing of auxiliary materials;
- Transportation of the above materials to the product manufacturing plant.

Reporting of information regarding the transportation of raw materials is optional (voluntary).

Manufacturing Stage

The LCA shall include information for the following unit processes:

- Inputs of energy/resource, pollutant emissions and waste generation during the product manufacturing processes;
- Transportation of process waste to the treatment/recycling plant and waste disposal processes;
- In-plant transportation of finished and semi-finished products.

Distribution and Marketing Stage

The LCA shall include information for the following unit processes:

- Reporting of information regarding transportation of products from the manufacturing plant to the downstream manufacturers or distributors/retailers' sites;
- Generation of waste packaging at the distributors/retailers' sites; if the packaging will be recycled, only the transportation to the recyclers will be considered;
- Transportation from the distributors/retailers to the consumers, and energy/resource inputs during the marketing/sales processes are not included.

Use Stage

The LCA shall include information for the following unit processes:

- Energy/resource inputs (e.g., solvents, heating of powder coating) required for the applications of product, and evaporation of solvents.

Recycling/end-of-life Stage

Reporting of information regarding the treatment/disposal of products or consumerables during this stage is optional (voluntary).

5.1 Specification of different boundary settings

Boundary in time

The validity period for the LCA results presented in the LCA report shall be defined.

Boundary towards nature

If the manufacturing processes are located within Taiwan, the solid waste categories as defined in Taiwan's Waste Disposal Act shall be adopted. If the processes are located in other countries, equivalent legal requirements shall be considered.

The natural boundary of the system shall describe the boundary where the materials and energy

resources flow from nature into the system, and where the water and air emissions and waste are released out of the system.

Only the quantity of the disposed waste needs to be considered; landfilling process does not need to be considered. If the waste is generated through wastewater treatment or incineration process, such waste should be included into the wastewater treatment or incineration process.

Boundaries in the life cycle

The boundaries in the product life cycle are described in Figure 1. The construction of the site and infrastructure, as well as the production of manufacturing equipment do not need to be included.

Boundaries towards other technical systems

Boundaries towards other technical systems describe the inputs of material and other components towards other systems, as well as outputs of materials towards other systems. For the inputs of recycled materials and energy towards the product manufacturing stage, the transportation between the recycling process and use of recycled materials shall be included in the data set. For the production of recyclable products during the manufacturing stage, the transportation towards the recycling process shall be included.

(Note: Further explanations are provided in Section 7 on open-loop recycling)

Boundaries regarding geographical coverage

The manufacturing stage may cover manufacturing processes located on any sites around the world. For processes located in a specific region, the data used should be representative of the region. The data for the main constituents shall be the specific regional data for the region where the process takes place (see Section 9). For ease of comparison, no matter where the emissions are generated, the same environmental impact parameters should be used for life cycle impact assessment (see Section 10).

6. Cut-off rules

For any impact category, if the sum of various impacts from a specific process/activity is less than 1% of the impact equivalent in that category, such a process/activity may be neglected during the inventory analysis. Nonetheless, the accumulated impact of neglected process/activity may not exceed 5%. Components and materials omitted from the LCA shall be documented.

(Note: This judgment for this "1% Rule" is based on the environment relevance assessment of material input to the system, and does not consider special and exceptional environmental impacts.)

7. Allocation rules

The main allocation rules shall be valid for the entire product system. For other secondary processes, other allocation rules may be defined; however, the use of these rules should be justified. Product-specific information should be preferentially collected in order to avoid the need for allocation. While selecting allocation rules, the following principles are recommended.

- <u>Multi-output</u>: The allocations are based on the changes in the resource consumption and pollutant emissions (for example, adopted quantity allocation for some main component, or surface

allocation for some components), following the changes in the studied system's output product or function or economical relationship.

- <u>Multi-input:</u> The allocation is based on actual relationship. For example, the manufacturing process's emissions may be affected by the change in waste flow input.
- Open loop recycling: For the input of recycled materials or energy during the manufacturing stage
 of the product system, the transportation between the recycling process and the recycling to
 material use shall be included in the dataset. For the product which shall be recycled during the
 manufacturing stage, the transportation towards the recycling process shall be included.

Notes:

- Allocation may be avoided through avoidance of dividing processes, for example as described in Section 6.3 of ISO/TR 14049; or through expansion of system boundary (for example as described in Section 6.4), so that the amended system shares the same product exchanges as the original system.

8. Units

The base units and derived units of the International System of Units (SI, Système International d'unités) shall be used preferentially.

Power & energy units:

power unit: Wenergy unit: J

Specification units:

length unit: m
capacity unit: m³
area unit: m²
weight unit: kg

If necessary, prefixes may be used before the SI units.

 10^9 = giga, symbol "G" 10^6 = mega, symbol "M" 10^3 = kilo, symbol "k" 10^{-2} = centi, symbol "c" 10^{-3} = milli, symbol "m" 10^{-6} = micro, symbol "µ" 10^{-9} = nano, symbol "n"

9. Calculation rules and data quality requirements

Data quality requirements for the raw material acquisition stage

- Site specific data shall be used for the manufacturing of main materials of the product. If other types of information are used, description of the information and rationale for using the information shall be provided. Regarding the site-specific data for the main materials, if a single raw material is sourced from multiple suppliers, data from the supplier which supplies over 50% of that material or the largest supplier of that material shall be used as representative data.

- Generic data may be used for the manufacturing of other materials (including secondary materials, additives and packaging materials) for the products. Please refer to Appendix I for the common sources of generic data.

Data quality requirements for the manufacturing stage

- Site specific data (for example, specific data for manufacturing plant) shall be used for the manufacturing and processing stage. If other types of information are used, description of the information and rationale for using the information shall be provided.
- Generic data may also be used when suppliers refuse to provide specific data, or when even if generic data are used in place of specific data, there is only minor impact to the results. The general rule is that if generic data are used in place of specific data, their combined contribution for all life cycle stages shall not be greater than 20% of total impacts for each impact category. But there may be certain exception to specific products, and such exceptions shall be explained.
- If the GHG emissions from the manufacturing stage operated or controlled processes are less than 10% of the emissions from the raw materials stage, then site-specific data of the raw materials stage shall be collected until the GHG emissions of the manufacturing stage and upstream suppliers is greater than 10% of the raw materials stage GHG emissions.
- When generic data are used, the equivalence between the chemical and/or physical process, as well as the technology and system boundaries of the referred generic system with the declared product system shall be considered. Moreover, it is also recommended to consider the date or geographic aspects of the data quality when feasible.
- The data shall be representative for the average of a specific year. If the average data for a specific year cannot be obtained, the average data for a specific time period may be used, the data shall be representative, and the reason for using such data shall be provided.
- The electricity mix for the manufacturing stage should be site specific data. If site specific data cannot be obtained, the official electricity mix for the country where the site is located may be used as approximate value. The electricity mix should be documented.
- For the definition of hazardous waste, the definition as defined in Taiwan's Waste Disposal Act shall be used for sites located in Taiwan. For sites located outside Taiwan, legal requirements for the host country shall be observed.
- For the transportation of main components/constituents to the manufacturing plant, the actual transportation modes used and distance traveled shall be considered.

Data quality requirements for the distribution and marketing stage

- For the transportation of products to the distribution sites or retailer sites, the actual mode of transportation and distance traveled shall be considered.

Date quality requirements for the use stage

- The product usage scenario assumed for this stage shall consider the solvents and energy used during product applications, and generic data may be used for this purpose.

Date quality requirements for the recycling/waste disposal stage

- Inclusion of information for this stage is optional. For transportation of end-of-life products to the processors/recyclers, the data from national, industry or consumer surveys can be used. When such data cannot be obtained, evaluation based on assumed scenario can be made, and the

assumptions for such a scenario shall be reported in the EPD.

10. Parameters to be declared in the EPD

The following parameters shall be declared in the EPD:

Energy use

- The energy consumption during each product life cycle stage shall be declared. If the product is intended for end-users, the power consumption during the use stage shall also be declared.
- The following units shall be used preferentially:

kW or W for power; J or MJ for energy.

Resource use

The information on resource input during the product life cycle stages shall be declared.

Impact equivalents expressed as potential environmental impacts

-Global warming kg CO2 equivalent
-Acidification kg SO2 equivalent
-Photochemical oxidant formation
-Eutrophication kg PO₄³⁻ equivalent
-Ozone depletion kg CFC-11 equivalent

Note: For characterization factors of each impact category, please refer to *EPD Supporting Annexes*, Version 1.0 (2008-02-29), The International EPD Cooperation, downloadable from www.environdec.com.

Additional information

- Recyclable materials (optional)
- Information on secondary materials (optional)
- Waste (classification):
 - Hazardous waste as defined in Taiwan's Waste Disposal Act. Follow host countries' laws for sites outside Taiwan.
 - Other waste.
- Plastic parts marking: Where technologically possible, plastic parts of the vehicle weighing ≥ 25 g shall be marked in accordance with the ISO 11469 and ISO 1043 Part 1/2/3/4, SPI or other international standard label to facilitate their identification and recovery at the end of life.
- Plastic packaging material marking: The Plastic packaging materials shall be labeled on the parts with SPI or other international standards for ease of sorting.

11. Recycling information

If practical, information for the constituents which can not be recycled and therefore should be disposed of properly during the end-of-life stage may also be included.

12. Other environmental information (Optional)

The EPD may cover information including technology adopted, site of product manufacturing and assembly, as well as information on other working environment, health and risk-related aspects.

If this PCR is to be used for product carbon footprint declaration purpose, in the declaration, information regarding commitment on GHG reduction should be included and shall ensure that the commitment is measurable, reportable and verifiable. The organization may also list environmental and energy management related information, such as awards, commendations and system certifications (e.g., ISO 14001, ISO 14064-1, IECQ HSPM) etc.

13. Information about the certification

The information on PCR review, EPD verification and verification organization shall be included.

EPD Certification is valid until 20XX	X			
According to the Requirements for the international EPD system. General Programme Instructions, Version 1				
(2008) – www.environdec.com				
The PCR review for	(PCR <mark>201X</mark> :) was administered by the Environment and		
Development Foundation and carried	l out by an LCA ex	pert panel chaired by Dr. Ning Yu (ningyu@edf.org.tw).		
Independent verification of the declaration, according to ISO 14025:2006				
	□ Internal	■ External		
Third party verifier: Environment Accredited by: Name: Title: Organization: Name: Title:	and Developmer	Signature:		
Organization:		Signature:		
Name: Title: Organization:		Signature:		
Environmental declarations from different programmes may not be comparable.				

14. References

The EPD shall make reference to the following documents:

- EPD General Program Instructions, Version 1.0 (2008-02-29), The International EPD Cooperation, downloadable from http://www.environdec.com/;
- Relevant PCR documents:
 The International EPD System, Product Category Rules, Paints, Varnishes and Related Products, Version 1.0, 2010-11-17.
- The underlying LCA report
- ISO 14040, "Environmental management Life cycle assessment Principles and framework", second edition, 2006-07-01.
- ISO 14044, "Environmental management Life cycle assessment Requirements and guidelines", first edition, 2006-07-01.
- CNS 15433: Technical Terms for Paints, November 18, 2010.
- Resource Recycling and Reuse Act, ROC Government (Revised Jan. 21, 2009)

When available, the following documents shall also be referenced:

- Other documents and recycling instructions which verify and complement the EPD.

Appendix I – Generic Data Sources to Refer to

For processes located within Taiwan, Taiwan generic data or the data published by the commercial, industrial and energy competent authorities of the Republic of China (ROC) government, may be used. However, for other regions (such as EU), if there are more relevant generic data available, these data should be used instead. When data from the following generic databases are used, the most current and updated data should be used.

Material	Database		
Packing materials, transport, Waste treatments	BUWAL 250		
Steel, Primary copper, Copper products, Electricity, Fuels, Aluminum, Chemicals, Transports, Waste management	ELCD		
	EIME (Environmental Information and Management Explorer) EcoBilan		
Plastics	PE Plastics Europe (Association of Plastics Manufacturers in Europe)		
	ELCD EIME (Environmental Information and Management Explorer) EcoBilan		
General Database	Ecoinvent		
	The Boustead Model		
	PE-GaBi		
	DoITPro (Taiwan)		

Appendix II – Reporting Format for the EPD

This appendix provides guidance information for the titles of sections, types of data and required information to be reported in the mandatory reporting part of the EPD. As a generic reporting template, the following titles and sub-titles are recommended:

(Refer to the PCR manual for the section numbering, the information in Italics are the recommended data/information for inclusion)

Introductory part

Each EPD should have an introduction part on the top part of the EPD which includes the following information:

- Company/organization name
- Product name
- EPD registration number

Description of the company/organization and product/service

Company/Organization

- Description of company/organization
- Description of overall working environment, existing quality system and environmental management system

Product and services (see Section 2)

- Product's main applications
- Description of product specification, manufacturing process, manufacturing sites (if there are several sites)
- $For \ product's \ environmental \ performance \ aspects, \ characteristics \ which \ may \ improve \ the \ usefulness \ of \ product$
- Other types of relevant information, for example, special manufacturing processes with special advantages to the environment

List of materials and chemical substances

- Content declaration (see Section 3)

Presentation of the environmental performance

- Outline of the LCA methodology, for example, period of LCA, declared units, system boundaries (graphical presentation), cut-off and allocation rules, and data sources.

Manufacturing stage (see Section 10)

Use stage (see Section 10)

- -Geographical region for product delivery
- -Transportation data
- -End-of-life information

Information about Company and Certification Organization

Recycling information (see Section 11)

Other environmental information (see Section 12)

Information regarding certification (see Section 13)

- Names of certification and verification organizations
- Validity of certification certificates
- Compliance with legal and relevant requirements

References (see Section 14)

- relevant PCR documents
- EPD General Program Instructions, Version 1.0 (2008-02-29)
- underlying LCA study
- other supporting documents for LCA information
- other relevant documents regarding company/organization's environmental activities

Appendix III Abbreviations

Acronym	Common Name
APLAC	Asia Laboratory Accreditation Cooperation
CFP	Carbon Footprint of Product
EPD	Environmental Product Declaration
ErP	Energy Related Product
ILAC	International Laboratory Accreditation Cooperation
ILAC MAR	International Laboratory Accreditation Cooperation
	Mutual Recognition Arrangement
ISO	International Organization for Standardization
LCA	Life Cycle Assessment
PCR	Product Category Rule
RoHS	The Restriction of the use of certain Hazardous Substances in electrical and electronic equipment
SPI	Society of the Plastics Industry
TAF	Taiwan Accreditation Foundation
TEC	Typical Energy Consumption
Trpt	Transportation