



INIES programme rules: General Programme Instructions

December 2024

Applicable from 01/01/2025

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1. CONTEXT

The environment is a key issue for the European Union, and is systematically taken into account in all European sectoral policies. Environmental and sanitary declarations, which complement the technical characteristics of construction products defined by the Construction Products Regulation (CPR) 305/2011/EC (CE marking), are essential.

It has always been important for the construction industry to ensure that these declarations, with a view to their publication and dissemination to the professional public, are properly drawn up and verified by an independent third party. The programme, as defined by standard NF EN ISO 14025, was set up in 2006.

French regulations on environmental declarations for construction products are set out in the following texts:

- Decree no. 2021-1674 of 16 December 2021 on the environmental declaration of construction and decoration products and electrical, electronic and HVAC equipment
- Order of 14 December 2021 on the environmental declaration of products intended for use in building works and on the environmental declaration of products used to calculate the environmental performance of buildings
- Order of 20 October 2022 amending the order of 14 December 2021 on the environmental declaration of products intended for use in building works and on the environmental declaration of products used to calculate the environmental performance of buildings
- Order of 14 December 2021 on the verification by an independent third party of the environmental declarations of products intended for use in building works and of the environmental declarations of products used to calculate the environmental performance of buildings

To sum up, under these regulations, if a declarant does not want default environmental data for its product to be used in the regulatory calculation of a building's environmental performance, or if it wants to make an environmental claim about its product, it must draw up an environmental declaration, have it verified by an independent third party as part of a declaration programme, and register it in a database managed by the same declaration programme. These declaration programmes must have signed an agreement with the French State. To date, the INIES programme is the declaration programme that has signed an agreement with the French State for construction products.

In France, FDES contain an environmental section meeting regulatory requirements and a sanitary section not covered by the environmental declaration regulation but required by the INIES programme. The INIES database hosts this data.

This document contains the rules applicable to the declaration, verification and recording of all types of data accepted by the INIES programme (see chapter 3). It is updated regularly (at least once a year) and compiles the decisions taken by the INIES programme's governance bodies (see §2.4). Between publications, these decisions are made available to stakeholders (verifiers, declarants and LCA practitioners) by e-mail or on the website www.inies.fr. The FAQ on the www.inies.fr website may also contain useful information.



2. CHARACTERISTICS OF THE INIES PROGRAMME

2.1 General

The NF EN ISO 14025 standard states that "the overall objective of environmental labels and declarations is, through the communication of verifiable, accurate and non-misleading information on the environmental aspects of products, to encourage and satisfy demand for products that generate less environmental impact and thereby stimulate the potential for continual market-led environmental improvement"

The objectives of Type III environmental declarations are to:

- provide information based on LCA and additional information relating to the environmental aspects of products;
- help buyers and users make informed comparisons between products (these declarations are not in themselves comparative claims);
- encourage improvements in environmental performance;
- provide information for analysing the environmental aspects of products throughout their life cycle.

Reminder: All environmental labelling, including Type III environmental declarations, must comply with the general principles set out in standard NF EN ISO 14020 "Environmental labelling - General principles".

2.2 Scope of application

This programme applies to construction products as defined in AFNOR standards NF EN 15804+A2 and NF EN 15804+A2/CN. Its purpose is the verification and publication of an environmental declaration submitted to the programme operator by a declarant (see definitions below).

For reasons of sectoral or regulatory coherence, the INIES programme also accepts within its scope:

- Furnishing products, in particular those cited in the scope of the LCA of buildings required by the environmental regulation for buildings (RE2020)
- Products used for civil engineering works and urban planning (consistent with the urban and regional scales), which are excluded from the scope of the RE2020.
- Processes and raw materials used to manufacture products within the scope of the INIES programme. For these, only the ICV data type is accepted (see §3.3).

Compliance with the rules set out in this document and all its appendices is mandatory as part of the subscription to the INIES programme.

2.3 Applicable products category rules (PCR) and complements (c-PCR)

The product category rules (PCR) relating to construction products (as defined in standard NF EN ISO 14025) are the standards NF EN 15804+A2 and NF EN 15804+A2/CN. These rules have been validated by the members of the AFNOR P01E 'Sustainable development in construction' standardisation committee. The normative nature of standards NF EN 15804+A2 and NF EN 15804+A2/CN makes it



possible to meet the general requirements of NF EN ISO 14025 concerning procedures for PCR and PCR development. These rules are applicable to all products within the scope of the INIES programme.

Appendix J gathers rules validated by the INIES programme. Unless there is an explicit mention limiting the rule to certain product families, these rules apply to all products within the scope of the INIES programme.

Finally, the following table provides a list of c-PCR recognised to date by the INIES programme. These are documents published and considered applicable in addition to standard EN15804+A2 by CEN TC350. Many other texts are in preparation or under revision. This table will therefore be updated as and when they are published and recognised by CEN TC350.

CEN/TC	NSB of TC	WI	EN reference/ track	Title
229	AFNOR	229188	EN 16757	Sustainability of construction works – Environmental product declarations – Product Category Rules for concrete and concrete elements
51	NBN	51149	EN 16908/A1	Cement and building lime – Environmental product declarations – Product category rules complementary to EN 15804
165	DIN	165270	CEN/TR 16928	Guidance for the implementation of environmental aspects in product standards and system standards in the field of wastewater engineering
33	AFNOR	33542	EN 17610	Building hardware – Environmental Product Declarations – Product category rules for building hardware

In the event of a conflict between a c-PCR requirement and the regulations, the regulatory requirement takes precedence.



2.4 Governance of the INIES programme and relations with its stakeholders

2.4.1 The steering committee (COPIL)°

To ensure that the programme runs smoothly, the COPIL ensures that all stakeholders are involved.

The COPIL defines the general policy for the content of the INIES programme by

- overseeing:
 - the ethics and professional conduct of the programme,
 - the maintenance of the programme's compliance with changes in the various regulations and standards relating to environmental and sanitary declarations,
 - the development of the procedures needed to verify all the data required to assess the environmental and sanitary performance of buildings,
 - the integration of the programme into European and international networks.
- approving:
 - communication initiatives,
 - any changes to be made to the operation of the programme and to the INIES programme rules,
- referring the matter to the INIES database bodies or public authorities as and when necessary.

As part of its mission, the COPIL may refer matters to the INIES database bodies or the public authorities as necessary.

Technical issues relating to the INIES programme are dealt with by the Technical Committee (CTIB), which advises the COPIL.

The Alliance HQE-GBC chairs and acts as secretary to the COPIL.

The Steering Committee meets as often as necessary, and at least four times a year.

To fulfil its mission :

- The COPIL may request a meeting of the CTIB if necessary.
- The COPIL may also be asked by the CTIB to provide arbitration or detailed decisions.
- The COPIL may call on the advice of qualified personalities to obtain objective and detailed opinions whenever methodological, scientific or ethical problems arise.

In order to lighten the agendas of plenary meetings and facilitate deliberations, the COPIL may create WGs devoted to specific subjects. COPIL members' participation in the WGs is voluntary. The COPIL secretary ensures that all members who so wish can take part in the WGs. He/she provides the WG secretariat. The WGs do not have decision-making powers; they submit proposals to the COPIL.

COPIL members are bound by confidentiality.

2.4.2 Declarants

Declarants refer to the owners of environmental and sanitary declarations for construction products (FDES, FDES Configurators or LCI). These may be manufacturers, trade unions or federations representing manufacturers of construction and decoration products.



2.4.3 The INIES programme operator

The HQE-GBC Alliance is the operator of the INIES programme. The programme operator is responsible for signing the agreement with the French State and ensuring that it is properly implemented.

The programme operator shall ensure that the requirements of the Order of 14 December 2021 on the independent third-party verification of environmental declarations for products intended for use in building works and environmental declarations for products used to calculate the environmental performance of buildings are implemented

As the operator, the Alliance HQE-GBC ensures that the tasks it has delegated to the manager of the verifier accreditation system are carried out properly. It is also responsible for the protection of logos acknowledging registration with the Programme ("FDES vérifiée INIES", "ICV vérifié INIES", etc) and chairs the Steering Committee of the INIES Programme.

2.4.4 The manager of the verifier accreditation system

AFNOR has been delegated by the INIES programme operator to manage the verifier accreditation system (initial accreditation and renewals). The manager receives applications for accreditation (initial or renewal) and validates their admissibility. The manager organises sessions of the accreditation examining board. It convenes the examining board and the candidates. The manager also organises the peer audit scheduled for the renewal of accreditations. It forwards the examining board's decisions to the Steering Committee. The manager also collects the verifiers' annual activity reports and forwards them to the programme operator. Verifiers accreditation is described in more detail in Chapter 6 of this document.

The manager of the accreditation system shall ensure that the requirements for validating the skills of verifiers specified in the Order of 14 December 2021 on the independent third-party verification of the environmental declarations of products intended for use in building works and of the environmental declarations of products used to calculate the environmental performance of buildings are implemented.

The manager of the accreditation system is responsible for ensuring the impartiality and independence of the accreditation process. It also ensures that the information gathered is confidential, that there are no conflicts of interest and that complaints are properly managed.

2.4.5 The verifiers

The verifier is the independent third party required by article R171-18 of the French Construction and Housing Code to carry out the mandatory regulatory verification of an environmental declaration. Verifiers are accredited under the INIES programme by the Steering Committee on the proposal of the examining board convened by the accreditation system manager (see 2.3.4 and chapter 6).

Standard NF EN ISO 14025 defines the role and responsibility of the verifier. This role is supplemented by various information contained in standard NF EN 15804+A2.

- NF EN ISO 14025: articles 3.8 / 3.9 / 5.7 / 8 / 9.4
- NF EN 15804+A2: article 9



To ensure that the programme runs smoothly, an up-to-date list of accredited verifiers is available on the INIES website (www.inies.fr).

2.4.6 Verifiers' Advisory Group

All verifiers accredited by the INIES programme are members of the Verifiers Advisory Group (GCV). The role of this group is to provide expert advice. It may concern the interpretation of regulatory texts or programme rules, the revision of programme rules, the operation of the programme, etc.

The GCV derives its legitimacy from the technical expertise of its members. Its opinions, comments and proposals will therefore be guided primarily by a technical interpretation of the requirements relating to the environmental assessment of construction products, and will not be concerned with purely individual issues.

The opinions, comments and proposals formulated by the GCV are advisory only and do not replace the regulations or the rules of the programme. They will be circulated between the bodies and the verifiers, and are not intended to be published as such, but may be used as a basis for changes to the INIES programme, once approved by the Steering Committee.

The GCV is one of the entry points for programme bodies to consult the verifiers on defined subjects. The Advisory Group will also be able to identify subjects to be dealt with spontaneously.

The GCV is led and convened by the secretary of the Steering Committee. The GCV may appoint several verifiers from among its members to act as GCV secretariat and liaise with the programme bodies.

In order to optimise the time of GCV members, consultations are mainly carried out by correspondence (using an electronic committee meeting or other means). However, depending on requirements, consultation meetings hosted by the programme bodies may be held to deal with subjects requiring strong interaction between members of the GCV. The GCV will meet at least once a year. Attendance at GCV meetings is not mandatory.

The existing annual verifier' meeting will be used to draw up the annual GCV review. An annual summary can be drawn up on this occasion. This annual meeting of verifiers remains mandatory.

2.5 Links between the INIES programme and the INIES database

Each declarant in the INIES programme must register their declarations (FDES), life cycle inventories (LCI) or configurators in the INIES database (see chapters 3 and 7 in particular).

The operator of the INIES Programme is an ex officio member of the INIES Database Supervisory Board (CSIB).

2.6 Compliance of the programme with standard NF EN ISO 14025

The INIES programme for construction products is based on the general procedures described in standards NF EN ISO 14025, NF EN 15804+A2 and NF EN 15804+A2/CN.

In addition, in relation to the general specifications of standard NF EN ISO 14025, it is specified that:

- the consultation of interested parties provided for by standard NF EN ISO 14025 concerning the development of rules relating to product categories [PCR] is deemed to have been carried out since they were the subject of a public enquiry meeting the requirements of the 2009 decree¹ on standardisation;
- the AFNOR/P01E "Sustainable development in construction" standardisation committee is in charge of work on standard NF EN 15804. It brings together professional federations and unions, laboratories, technical centres, consumer organisations, government departments, manufacturers, etc.;
- environmental and sanitary declarations are currently mainly intended for professionals, as specified in standards NF EN 15804+A2 and NF EN 15804+A2/CN, although the general public may be interested in them and consult them;
- in the case of declarations intended for the general public, NF EN ISO 14025 article 9.4 requires verification by an independent third party whose competence has been established. The independent audit implied by membership of this programme is deemed to satisfy this requirement;
- this programme is regularly revised to incorporate changes to standards NF EN 15804+A2 and NF EN 15804+A2/CN. In 2018, LCIs and product configurators have been integrated into this document.

¹ Decree no. 2009-697 of 16 June 2009 on standardisation



3. DATA ELIGIBLE FOR THE INIES PROGRAMME

3.1 Environmental and Sanitary Declaration Sheets (Fiches de declaration Environnementale et sanitaire - FDES)

There are no geographical restrictions for this programme. However, FDES for construction products must comply with the acceptance conditions, which specify that the declarations must respect the format of standard NF EN 15804+A2 and the national supplement NF EN 15804+A2/CN, as well as the following French regulations:

- Environmental declarations
 - Decree no. 2021-1674 of 16 December 2021 on the environmental declaration of construction and decoration products and electrical, electronic and HVAC equipment
 - Order of 14 December 2021 on the environmental declaration of products intended for use in building works and on the environmental declaration of products used to calculate the environmental performance of buildings
 - Order of 20 October 2022 amending the order of 14 December 2021 on the environmental declaration of products intended for use in building works and on the environmental declaration of products used to calculate the environmental performance of buildings
- Those on VOC emissions for the products concerned: Decree No. 2011-321 and Order of 19 April 2011 on the labelling of construction products or wall or floor coverings and paints and varnishes on their emissions of volatile pollutants and Order of 20 February 2012 amending the Order of 19 April 2011),
- As well as the one on independent third-party verification: Order of 14 December 2021 on the verification by an independent third party of the environmental declarations of products intended for use in building works and of the environmental declarations of products used to calculate the environmental performance of buildings

An FDES is a cradle-to-grave environmental declaration within the meaning of standard NF EN15804+A2. It therefore covers the entire life cycle (modules A to C of this standard) and contains a module D.

Declarants can produce individual or collective FDES in-house or externally.

The FDES must be in French so that it can be read by users on the French market. In addition, registration with the INIES Programme does not take charge of any translation of FDES.

The template form given in standard NF EN15804+A2/CN has been used for this programme (see Appendix B). This template must be used. The declaration may use a graphic charter specific to the declarants, except for INIES logos and trademarks. The procedure for submitting FDES to the INIES database is explained in chapter 7.

3.2 Configurators and configurable declarations

Configurable declarations within the meaning of the regulations cited in §1 and configurators (tools used to generate and configure configurable declarations) must be checked and registered in the INIES programme in accordance with the rules in appendix N.



3.3 Life Cycle Information module (ICV)

For the purposes of the INIES programme, a life cycle information module (ICV) is a dataset containing the values of the environmental performance indicators of standard EN15804, calculated only for stages A1-A3 of the life cycle. A ICV is therefore not an environmental declaration that complies with the regulations, as it does not contain all the information required.

A ICV can be registered with the INIES programme and published in the INIES database for a given product:

- if there is also an environmental product declaration published in the INIES database to support an environmental claim for the product (see note below),
- or if no environmental claim has been made for the product (attestation on the declarant's honour)
- or if this product is not a construction or decoration product within the meaning of the regulations on the environmental declaration of construction and decoration products and its LCI can be used to produce the environmental product declaration for a construction product.

The ICV cannot be used to justify the product's environmental performance in the context of the RE2020 (building environmental regulation). The ICV may be communicated to third parties to produce environmental declarations in compliance with the regulations on environmental declarations for construction and decoration products.

Note: For a construction product A meeting the first two exemption conditions of §5.2 of standard NF EN15804+A2, it will be possible to use the environmental product declaration of a product B, using product A in its composition (and using the LCI of A as the source data for calculating the environmental product declaration of product B), as an environmental product declaration to justify an environmental claim on product A. The declarant of product B will have to give his agreement to the declarant of the LCI of product A.

3.4 General requirements applicable to information contained in FDES and ICV

The clarity, transparency and justification of the information contained in an FDES or ICV are key requirements of the INIES programme. All the information contained in an FDES or ICV must be justified or objectified by the content of :

- the document itself
- the report accompanying the document (accessible to the verifier and market control authorities),
- public documentation relating to the products covered by the FDES or ICV,
- the documentation required by the verifier during the verification process (accessible to the verifier and the market control authorities)
- any other document required by the market control authorities.

In addition, an FDES or ICV must not contain any value judgements and the information must be written as neutrally, objectively and factually as possible.

4. DATA CONFIDENTIALITY

4.1 Declarations

Declarations are provided voluntarily by a declarant, who is responsible for submitting them to the admission and registration procedure. This procedure, which is regularly updated by the governance of the INIES programme, is the preferred means used to improve the quality of the information provided and its relevance to the context.

This information is the property of the declarant, who makes it available to the INIES database free of charge under the conditions set out below.

The declarant accepts that this information will be subject:

- to provision to third parties for free consultation on the INIES database website (<http://www.inies.fr>);
- to use within the framework of chargeable functionalities of the webservice type or equivalent services, intended for third parties (software publishers for example) duly approved by the Supervisory Board of the INIES Database (CSIB). The income from these paid accesses is exclusively allocated to the operation and development of the INIES database.

Any plans to market the data, other than those referred to in this article, are subject to the prior agreement of the declarants.

The conditions of use of the information by the various users and the procedures for controlling the use of the data will be defined by the Supervisory Board (CSIB) on the advice of the Technical Committee of the INIES database (CTIB).

The declarant is also responsible for transmitting updated information to the database administrator.

If the declarant decides to withdraw the information made available, it shall submit a request to the Database administrator and to the Programme operator. In this case, the information concerned is removed from the area accessible to the public. However, it is kept in the database in order to ensure traceability of the database's contents. The CSIB and the CTIB can obtain access to this non-public part of the database on request from the HQE-GBC Alliance, which owns the database.

4.2 Other documents

Other documents can be placed in the declaration area with an associated FDES:

- Mandatory and public: the verification certificate
- Mandatory and not made public: the verification report
- Optional and public: product images, other advisory documents (eg: Initial EPD)
- Optional or mandatory (in certain cases, see chapter 8) and not made public: proof of performance, various supporting documents



5. PROCESS OF THE INIES PROGRAMME

5.1 General

The NF EN ISO 14025 standard requires the operator of a type III environmental declaration programme to establish transparent procedures for independent verification.

This paragraph proposes a procedure for verifying the environmental and sanitary declarations themselves and the supporting documents for these declarations, in particular the life cycle assessments.

For the contract relating to the application of the verification procedure (or the estimate associated with the service), the INIES programme does not provide a template, but gives recommendations on the content.

To guarantee the independence of the verification procedure, the INIES programme rules specify that the contract must contain:

- information on the duration and costs of the verification procedure;
- elements relating to payment conditions, which must specify that the verifier must be paid even if the result of the verification process is negative (data not provided to the verifier or verifier's comments not taken into account).

The checklist common to all Eco Platform members (see appendix E) serves as the basis for the verification procedure.

Subcontracting the verification of the FDES by the FDES producer is strictly forbidden. The verifier contract must be drawn up between the declarant and the verifier.

It is accepted that a verifier may subcontract or co-contract part of the verification. In this case, the two verifiers are mentioned in the verification report, the verification certificate and the FDES.

5.2 The verification: principles and required content

The verification should enhance the credibility of the work carried out by the issuer of the declaration. It is not intended to reproduce all the analyses, nor to be confused with a consultancy or advisory role. It is essentially documentary in nature: the aim is to check that the information provided is justified in a relevant and appropriate manner.

5.3 Confidentiality and provision of information

After confidentiality agreement, the applicant who provides the declaration must make available to the verifier the accompanying report in French provided for in article 8 of standard NF EN 15804. At the verifier's request, he or she may be asked to provide other supporting documents. If the verifier agrees, the accompanying report may be in another language with which he/she is familiar (usually English).

The verification report can be in either English or French. However, if the verification report is in English, its summary and conclusion must also be translated into French.

5.4 Verification points

The points to be examined by the verifier are listed below:

- Verification of formal compliance with standards requirements:



- Inventory
 - Impact assessment
 - Health and comfort characteristics
- Verification of technical and scientific validity,
 - Verification of communication aspects (see requirements in the NF ISO 14020 series of standards).

The checklist (see Appendix E) lists the minimum requirements to be verified by the verifier. This list is not exhaustive, but the verifier must justify, in the verification report (Template in Appendix D), that all the points in the checklist were checked during the verification process. The use of this checklist is the basis of the mutual recognition process between Eco-platform member declaration programmes.

It is the verifier's responsibility to ask precise, factual questions to encourage the most informed discussion possible with the verification sponsor.

The producer and/or the sponsor responds in writing to the verifier's questions on:

- minor errors or omissions;
- responses that required further investigation into data sources, justification of assumptions or calculations, etc.

These responses and comments may be considered acceptable, given their context, by the verifier or may lead the verifier to ask written questions of the producer and the sponsor.

5.5 Verification findings

The verifier includes in his/her verification report:

- his/her conclusions on the answers to the questions asked;
- highlighting sensitive points, which should not, however, be such as to call into question a positive conclusion of the verification, but which should be improved when the FDES, configurator or LCI is revised;
- his/her general conclusion of acceptance or refusal, sanctioned by the verification certificate (which is attached to the declaration in question).

If the verifier so wishes, he/she can include in his/her verification report an exhaustive record of the questions asked by the verifier and the answers given by the declarant.

It must be possible to distribute the verification report to verifiers asked to carry out a verification as part of the renewal of an accreditation. The declarant can then conceal the confidential information contained in the verification report.

5.6 Complaints and sanctions

Any organisation or individual may submit questions, comments or complaints to the INIES programme operator on:

- the INIES programme
- a FDES
- a configurator
- a ICV
- the result of an accreditation examination



- the result of a verification
- misuse of the "INIES-verified FDES" and "INIES-verified LCI" logos

Questions, comments and complaints can be sent to the programme operator:

- to the following e-mail address: Inies@hgegbc.org
- via the [INIES database website](#) (contacts section)

5.6.1 Questions put to the INIES programme operator

When the INIES programme operator receives questions, it answers them in accordance with the decisions taken by the Steering Committee. If it is unable to answer a question or if it does not know whether the answer is in line with the Steering Committee's decisions, it passes them on to the Steering Committee. The Steering Committee may, if necessary, ask the CTIB for an opinion or, in the case of regulatory issues, the DHUP. The responses, approved by the Steering Committee, are then sent to the people concerned by the INIES programme operator.

As far as possible, the INIES programme operator submits the most technical questions, that it is unable to answer, to stakeholders (verifiers (through the advisory group) and declarants (through their representatives in the governance bodies)). The results of this consultation are then shared with the Technical Committee. The latter is responsible for formulating a proposal to the COPIL. The COPIL is then responsible for validating this proposal.

To respond to a possible dispute, resolve a question raised by an interested party or propose harmonisation of verification procedures, the Steering Committee may ask the group of verifiers for an opinion or set up an ad hoc committee which may draw on the expertise of the member bodies of the AFNOR/P01E standardisation committee. Decisions will be managed and officially published on the INIES website, particularly when these regulations are updated.

5.6.2 Complaints - market surveillance

Any complaints should be sent to the INIES programme operator at the following e-mail address inies@hgegbc.org. The confidentiality of the natural or legal person submitting the complaint is guaranteed.

The INIES programme operator must record and process all complaints. It assesses their admissibility within the limits of its competence and may ask the Steering Committee for help in assessing their admissibility.

"Suspected" anomalies

Complaints relating to the content of a verified FDES, ICV or configurator are known as "suspected anomalies". Barring exceptional circumstances, the programme operator will investigate a suspected anomaly within one month of receiving it.

This investigation consists of :

- assessing the admissibility and significance of the suspected anomaly. The anomaly is classified as minor, moderate or major. An anomaly is considered significant if it influences the result of the calculation of indicators subject to regulatory requirements or if it potentially creates a significant distortion of competition,
- transferring on any suspected anomalies deemed admissible to the declarant and the verifier concerned.



If no other deadline is set by the programme operator, the registrant must provide the programme operator with a justified response within 30 days and submit a timetable for correcting any anomalies found. The INIES programme operator (with a decision from the COPIL if necessary) decides on the responses provided. If necessary, it may request corrective action from the registrant and validate the proposed correction schedule. If the decisions of the INIES programme operator or the COPIL are not applied, or the expected response is not satisfactory, the COPIL may decide to apply a sanction: archiving or withdrawal for the FDES or ICV; warning, suspension or withdrawal for the verifier.

In the event of a proven major anomaly, the programme operator may decide to preventively withdraw the FDES or ICV from the INIES database.

As part of its quality commitments to the INIES database, the programme operator ensures that all proven anomalies are resolved (investigation and correction) within 6 months of receipt of the presumed anomaly.

Since 1 January 2019, a robot, managed by the INIES database administrator, has been in place. It is used during the admissions phase. It detects abnormally low or high values (as well as 0 and negative values) and performs a consistency calculation between the values per life cycle phase and the total. It generates suspected anomalies that can be corrected during the admission phase. These presumed anomalies are managed by the INIES database administrator in coordination with the programme operator.

Maintenance of unfavourable values (based on the CR of the COPIL of 11 June 2024)

Anomalies identified in a declaration may be unfavourable to the declarant (unfavourable environmental indicator values). Updating and verifying an environmental declaration can be time-consuming and costly. Declarants would sometimes prefer to continue penalising themselves in order to avoid this update. Maintaining unfavourable environmental indicator values in a declaration is therefore authorised by the INIES programme, whatever the indicator concerned. However, for the global warming indicator, if the value is more than 10% unfavourable, an update is required within a maximum of one year of the notification. Presumed anomalies involving unfavourable values are therefore now reported to the declarant, but no longer subject to systematic requests for correction.

5.7 Cost of registration in the INIES programme

Full details of the cost of registering in the INIES programme are provided in Appendix A.

5.8 Identification for the INIES programme

Declarants of FDES or ICV verified by the INIES programme have the right to use the following logos in accordance with the terms and conditions defined in appendix G.



5.9 Summary of the configurator verification procedure

See appendix N

5.10 Validity period and updating of Declarations (FDES, LCI, etc.)

The start of the validity period of the FDES and LCIs corresponds to the date of verification mentioned in the verification certificate.

The validity end date is 31 December of the year of verification plus 5 years. For example, a declaration verified in 2018 is valid until 31 December 2023.

During this validity period, declarations may be updated, some of which may modify the validity period (see below).

There are two types of data update:

- minor update,
- major update.

The table in §5.10.3 summarises the different types of update.

5.10.1 Minor update

The programme considers an update to be minor as long as neither the definition of the UF nor any of the indicator values in the results table are modified. This mainly concerns editorial changes (typing errors, correction of spelling mistakes, postal address, illustrations, name, etc.). The product is not modified. The validity date of the FDES remains unchanged. Errors in digitising the PDF file in the INIES database are considered to be minor updates.

The filing of the modified document with the INIES programme is not subject to verification by a verifier accredited by the programme. As no verifier is involved, the declarant bears full responsibility for the minor nature of the update. In order to ensure traceability, the declarant must produce and record in the INIES database (in the "comments" section) a description of the modifications made.

5.10.2 Major update

The verifier must be asked to validate the changes. In the event of a major modification, the version of the FDES is modified. In particular, an update is considered to be major if one or more indicator values in the results table is/are modified.

The following are examples of major updates:

- Five-yearly review, starting again from a new 5-year period (with verification including a check on the age of the data taken into account in the update);
- Major update (which modifies the value of the indicators) during the validity period:
 - This update is carried out with verification but without changing the validity date of the FDES, with a number that traces this revision and therefore without registration costs. The declarant must register the FDES again at the end of the initial period of validity and update it again as for a five-yearly revision.
 - If all the data is updated, the declarant must be able to choose between starting again on a 5-year cycle by re-registering its FDES or continuing its initial period and, at the end of this period, finding itself under the obligation to perform a five-yearly revision.

If the update concerns a new product name, it is a minor update.

Any change to an indicator of $\pm 10\%$ is a major modification.

Any changes to products (commercial references covered, place of manufacture, etc.) must be verified again.

Any update to an FDES resulting in a change to its "vintage" must be justified in terms of the requirements of standard NF EN 15804+A2, and in particular the age of the data used and the validity of the scenarios declared.

5.10.3 Summary

Type of update	Conditions	Need verification	Registration number	Validity end date
Minor	Editorial changes, the products and sites covered are unchanged, the data and scenarios are unchanged, the indicators are unchanged (e.g. change of product name without change of manufacture, change of manufacturer's name or trademark, change of address, change of photo, logo, etc.)	No	Unchanged	Unchanged
Major incomplete	Add a reference/range or Add a manufacturing site or Add a manufacturer for collective FDES based on a finite number of members or Modification of data or methods resulting in a change to the LCI or indicators or Modification of declared performance for products + the update is <u>not sufficiently complete</u> to justify a new 5-year period	Yes (updated certificate of conformity only)	Modified (addition of R1 for example)	Unchanged

Major complete	Add a reference/range or Add a manufacturing site or Add a manufacturer for collective FDES based on a finite number of members or Modification of data or methods resulting in a change to the LCI or indicators or Modification of declared performance for products + the update is <u>sufficiently complete</u> to justify a new 5-year period	Yes (new certificate of conformity)	New	New
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5.10.4 Updating verification certificates

Major updates require validation by the verifier and therefore an update of the verification certificate. In the case of major incomplete updates, the verification certificate will be updated and not a new verification certificate issued.

In particular, when verifying the correction of anomalies in data produced in accordance with standard NF EN15804+A1, it is permitted to update and publish a verification certificate of compliance with standard NF EN15804+A1, even though this type of certificate can no longer be issued for new FDES/LCI modules or configurators since November 2022.

5.10.5 Request to extend the validity of a declaration

This paragraph is based on COPIL decision N115 dated 30/06/2023.

It is the responsibility of declarants to anticipate the end of validity of their environmental declarations.

However, as the number of authorised verifiers is limited and waiting times can be long, the INIES programme has introduced a procedure for requesting an extension of the validity of an environmental declaration when the verification process delays the updating of the declaration. Declarants may be authorised to extend the validity of their declarations if they meet the following two conditions:

- Have a contract with a verifier at least six months before the date on which the declarations are due to expire; the contract must indicate a provisional date for the end of the verification process,
- Send the environmental declarations to the verifier at least 3 months before their expiry date, certifying on honour that these are the versions subject to verification.

Requests for extension of the validity of a declaration must be sent to inies@hgegb.org with supporting documents at least three months before the expiry date.

Depending on the state of the verification market, in the event of misuse by declarants or in the event of a change in regulations, the INIES programme reserves the right to modify this procedure without prior notice.

5.11 Retroactive application of programme rules

Certain programme rules adopted by the Steering Committee apply not only to new environmental declarations but also to declarations that have already been verified and registered. They are applied retroactively. In the interests of fairness, all declarations must comply with the new regulations. When the Steering Committee decides to apply this type of rule, it provides an update deadline for FDES that



have already been verified and registered. This period may not be less than 3 months. If the rule does not mention retroactivity, then by default it only applies to new declarations.

When the new rules have an impact on LCA results and the values of environmental indicators and parameters, compliance can be achieved in one of two ways:

- Updating the declaration using the new rules
- Submission of proof that the new rules:
 - o do not change the above-mentioned values by more than 10% (compliance with the principles of article R171-17 paragraph 16 of the Code de la Construction et de l'Habitation)
 - o or are more favourable than the rules currently used in the declaration (in which case the declarant agrees to penalise itself by not updating its declaration).

6. PROCEDURE FOR ACCREDITATION OF VERIFIERS

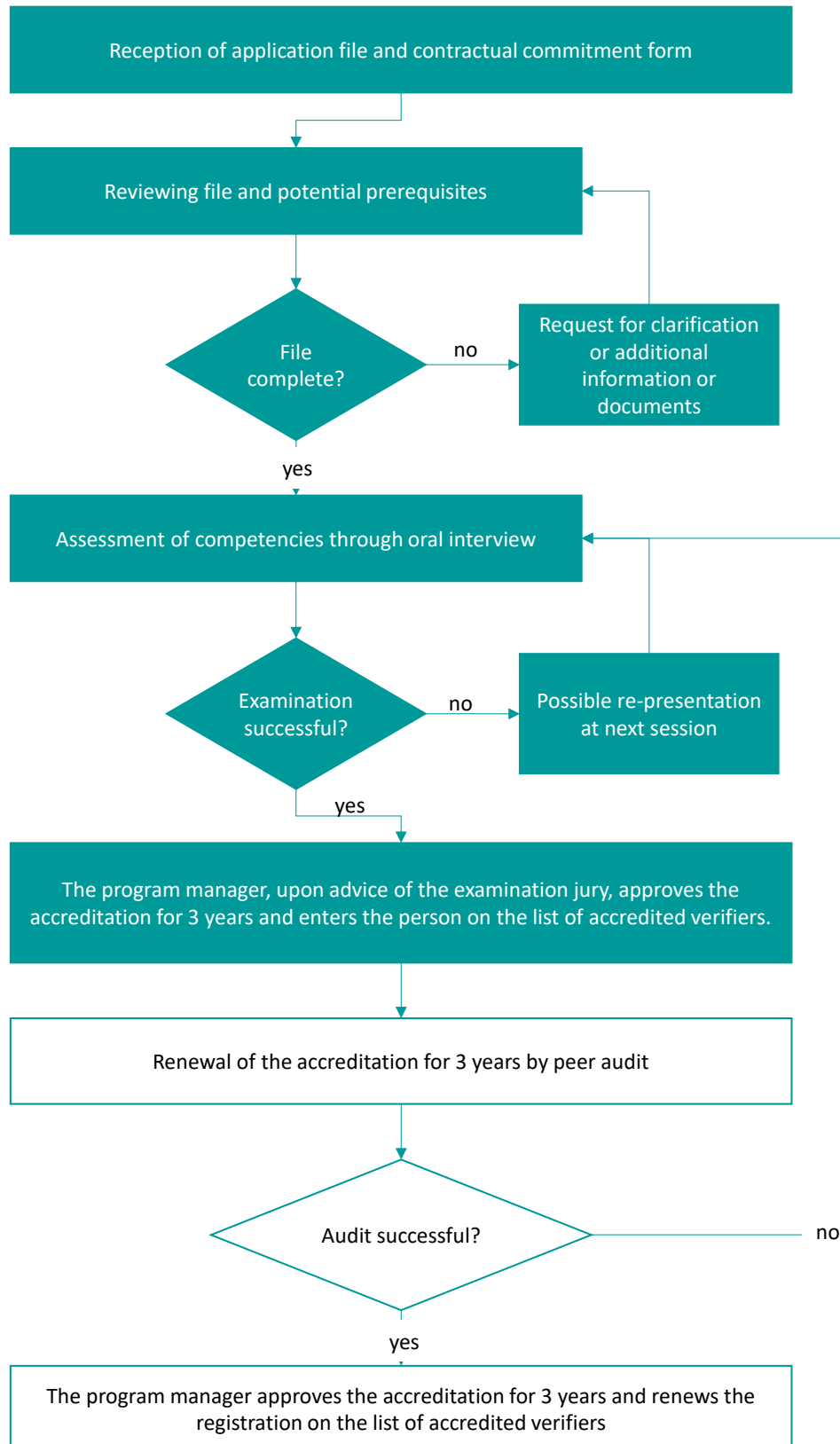
The role of the accredited verifiers is to check, in accordance with the procedures laid down by the INIES Programme, that the FDES comply with the NF EN 15804 standard and its national supplement, the decree and various orders in force, and the regulations of the programme.

The accreditation of verifiers is based on the recommendations of ISO 14025 and takes into account best professional practice. The aim of this procedure is to qualify the skills required to ensure the quality and independence of the verifications of FDES submitted to the INIES Programme compliance procedure.

To carry out the verification of environmental and sanitary declarations, verifiers must be able to prove their competence in accordance with the dedicated accreditation system (public reference), which is deemed to comply with the specifications of standards NF EN ISO 14025, NF EN 15804 and NF EN 15804+A2/CN.

It should be noted that the accreditation exam is conducted in French. INIES programme verifiers are accredited for a period of 3 years.

6.1 Flow chart of the accreditation process





6.2 Submitting applications

Verifier accreditation sessions are organised according to an annual schedule, with at least one session per year.

It determines the registration, eligibility and admission dates for candidates.

A registration pack is available for candidates wishing to register for an accreditation session. This file consists of the following documents:

- A general information leaflet.
- Registration terms and conditions.
- A registration form.
- A list of the official texts you need to master for the oral interview.
- A list of documents to be provided for each accreditation (initial, renewal).

These documents are available on the INIES website.

The file is studied by the examining board to validate the candidate's prerequisites for taking the exam.

Note: You can only become a verifier as an individual, not as a legal entity.

6.2.1 Information on eligibility criteria for initial accreditation and renewal of accreditation of verifiers

6.2.1.1 Initial accreditation

Language	Fluency in French	
Initial training (Cf. Note 1)	Baccalaureate or equivalent	Baccalaureate and above (university diploma or training leading to qualifications)
Professional Experience (Cf. Note 2)	5 years	4 years
	Experience including the practice of life cycle assessment in the field of construction products and having produced at least 2 FDES available on the INIES database (and therefore verified) for different product families (see note 3) over the last 2 years. The corresponding verifications must have been carried out by at least two separate verifiers (see note 4).	
Environmental domain	2 professional experiences related to the environment.	
Construction sector	2 years' experience in construction and construction products.	
Specific knowledge	<p>Familiarity with the standards on environmental declarations (NF EN ISO 14020, NF EN ISO 14021 and NF EN ISO 14025), the standards on life cycle analyses (NF EN 14040 and following) and the principles of NF EN ISO 19011 applicable to independent verification.</p> <p>It is also essential to be familiar with standard NF EN 15804 (and its amendments) and standard NF EN 15804+A2/CN for construction products and the INIES programme rules.</p>	



Explanatory notes

(1) Including diplomas and certificates recognised as equivalent according to the official nomenclature of training levels.

(2) ICAE or ACAE certified auditors with proven experience in the field of construction and FDES will be considered as meeting this prerequisite.

(3) Concerning the notion of product families, these are not families as defined in the INIES database nomenclature. Here we're talking about the major materials "sectors" (wood, concrete, steel, terracotta, etc.). Failing this, the application will remain admissible, but the Steering Committee may limit accreditation to a probationary year during which the applicant must verify at least one FDES from a different family.

(4) Failing this, the application will remain admissible, but the COPIL may limit accreditation to a probationary year, during which the applicant must have at least one FDES that it has produced verified by another verifier. The aim of this requirement is to encourage cross-fertilisation between FDES makers and verifiers in order to better guarantee the independence of the verification.

The examination consists of an oral interview.

The oral interview comprises three distinct phases:

- a phase in which the candidate prepares for the interview on a subject (case study) proposed by the examining board;
- a phase in which the candidate presents his/her subject to the examining board;
- a phase of free discussion between the examining board and the candidate in the form of a question and answer session.

In the event of failure, candidates may re-sit as many times as they wish at subsequent sessions, provided they can demonstrate:

- compliance with eligibility requirements;
- mastery of sensitive points identified during the previous exam.

6.2.1.2 Renewal of accreditation

Renewal of the accreditation after 3 years is based on monitoring of the accredited person's activity as a verifier and on a peer audit.

Activity monitoring

To renew their accreditation, accredited persons must demonstrate that, during the 3 years of their accreditation, they have improved their skills and knowledge, in particular:

- by following training courses,
- by taking part in seminars, conferences and expert symposia,
- by attending verifiers' meetings (at least once a year)
- by demonstrating actual activity in terms of verifying FDES, critical reviews as defined in standard NF EN ISO 14040 or carrying out LCA,
- by having carried out at least 2 verifications of FDES and LCI in the last 3 years.

The person must provide the means of proof to justify the actions they mention.

He/she must draw up an activity report covering all these elements and submit it to AFNOR at least 2 months before the session date.



Verifiers are also asked to provide an activity report on the verifications carried out each year, following the format requested by the INIES programme.

Peer audit

The peer audit consists of a review, by two accredited verifiers, of an FDES verified by the verifier to be renewed. The purpose of the exercise is to validate the professional skills required to carry out an verification, to help the verifier under review to improve his or her skills, to adopt best practices and to comply with established standards and principles. It is an exchange of views between two parties on an equal footing. This review gives rise to two audit reports. If at least one of the two audit reports is negative, the verifier must retake the entrance exam before the examining board. The decision to renew accreditation is taken by the Steering Committee on the recommendation of the examining board.

Only verifiers who have verified at least 1 FDES during their accreditation period may take part in the peer audit. Each accredited verifier fulfilling the above condition is obliged to audit one of his/her colleagues at least twice between each of his/her renewals.

The selection of verifiers must respect the rules of independence between verifiers and auditees.

6.3 Composition of the examining board

The examining board is made up of at least three examiners:

- a representative of the declarants,
- a representative of FDES users
- an expert third party.

The accreditation programme manager and a representative of the program operator may take part in the examining board. The composition of the examining board is established in advance and validated by the steering committee. The examining board proposes its decisions on initial accreditation or renewal. Decisions are ratified by the Steering Committee.

6.4 Maintaining skills - Annual verifiers' meeting

To help maintain the skills of verifiers, meetings are organised with all accredited verifiers and Steering Committee members who wish to attend, to disseminate information and discuss:

- updating standards;
- updating regulations;
- modifying programme rules;
- harmonisation of verification procedures.

These meetings are organised as often as necessary, with a minimum of one meeting per year.

These meetings are mandatory for all verifiers. After 2 missed meetings, the verifier will be obliged to retake the initial examination if he/she wishes to continue to be accredited.



6.5 Accreditation and verification start dates

Following the initial accreditation or renewal, verifiers receive a letter from COPIL stating the period of validity of their accreditation. This period corresponds to the period during which the verifier may begin a verification. Thus, the absence of renewal of an accreditation cannot render null and void a verification started during the accreditation period but concluded outside this period. Consequently, the verification certificate (or its update) and the verification report must include the verification start date.

The verification start date is the date on which the verifier acknowledges receipt of the documents to be verified. The documents submitted must be complete and the verifier must assess whether they are ready to be verified. In the event of a dispute, this acknowledgement of receipt and the original documents submitted for verification must be available to the INIES programme or the market control authorities.

6.6 Complaints and sanctions

In the event of a complaint highlighting proven shortcomings or non-compliance with the provisions laid down, the INIES programme will take proportionate and graduated measures, which may go as far as suspending or withdrawing the INIES verifier's accreditation, particularly in the case of:

- Insufficient skills or knowledge
- Unsatisfactory verifications
- Non-compliance with obligations to update skills.

The same procedure as for market surveillance explained in section 5.6.2 of the regulation will be applied.

7. PROCEDURES FOR REGISTRATION AND ADMISSION TO THE INIES DATABASE

7.1 Environmental declaration (FDES)

See appendix L.

7.2 Life cycle information module (ICV)

See appendix O.

7.3 Configurator

See appendix N.

8. EUROPEAN COOPERATION

8.1 Principle of mutual recognition

The INIES programme follows the work of the ECO PLATFORM association. ECO-PLATFORM is not a programme operator but a European association whose aim is to bring together all European programmes to facilitate the recognition of EN 15804 environmental declarations throughout Europe.



The INIES programme complies with the quality and harmonisation rules for verifying environmental declarations compatible with the regulations referred to in §1. In this context, any verification within the INIES programme must use the checklist in appendix E.

In order to facilitate the recognition of environmental declarations, the INIES programme is developing mutual recognition agreements with other European or international programmes. In all cases, an environmental declaration from another programme wishing to be registered in the INIES programme must meet the requirements of the INIES programme. The purpose of the mutual recognition agreements is to make the general instructions specific to each of the programmes more transparent in order to facilitate the preparation of environmental declarations that comply with different programmes or to facilitate their adaptation to each of the programmes. The agreements will also aim to develop a common pool of verifiers in order to reduce verification costs. Finally, in the long term, the agreements will aim to harmonise the rules between programmes, as far as possible and in compliance with regulatory requirements.

To be included in the INIES programme, the EPD must be drawn up for a given functional unit (application and performance specified) for a product sold on the French market. Only EPD covering the entire life cycle are accepted in INIES. In addition, health and comfort information is required in the INIES programme.

It is also important to ensure that end-of-life and transport are appropriate for the use of the product on the French market. These points are parts of the verification work by an INIES-accredited verifier.

The environmental declaration adapted to the French context must be in French. The declaration already registered in another programme may be attached to this declaration when registering for the INIES Programme.

At this date, a mutual recognition agreement exists between the INIES programme and the DAP Construcción programme (Spain). Appendix Z gives details of each of the agreements signed. Agreements are currently being negotiated with the BauEPD (Austria) and IBU (Germany) programmes.

8.2 FDES translation

It is possible to have an FDES translated and retain the "FDES vérifiée INIES" logo on the translated document. The translated FDES must include the statement (in French and in the language of translation) on the first page:

« Cette FDES a été traduite sous la responsabilité de XXXX. Seule la version française fait foi pour la conformité à la réglementation française Cette version traduite ne suffit pas à revendiquer la conformité à un autre programme de déclaration que le programme INIES. »

"This FDES has been translated under the responsibility of XXXX. Only the French version is authentic for compliance with French regulations. This translated version is not sufficient to claim compliance with a declaration programme other than the INIES programme."

The translated version can also be attached to the original FDES in the INIES database in the "documents" section of the FDES.