

## APPENDIX N – VERIFICATION AND REGISTRATION PROCEDURE FOR CONFIGURATORS AND CONFIGURED DECLARATIONS

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**This document is a translation of the French version of INIES programme rules. Only the original French version is authentic and official.**

This procedure has been approved by the INIES database Technical Committee and Steering Committee. All the elements of appendix P (informative) of the national complement NF EN15804+A2/CN which do not contradict this appendix may be used.

It is applicable and mandatory for all new requests to register a configurator and configured declarations in the INIES programme.

### APPENDIX N - PROCEDURE FOR VERIFYING AND REGISTERING A CONFIGURATOR AND CONFIGURED DECLARATIONS

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## 1. INTRODUCTION

Opening a declarant account in INIES (see Appendix M) is a prerequisite for registering a configurator or configured declarations in the INIES programme.

In the remainder of this document, registration refers to the procedure for registering a declaration or configurator in the INIES programme. This registration involves entering information in the INIES database and/or transmitting information to the INIES programme. It is accompanied by the issue of a programme registration number. It is distinct from the verification processes that lead to the production of the verification report. Verification certificates are produced after verification and require registration numbers.

Throughout this document, the term "regulations" refers to the regulatory texts cited in §1 of the INIES programme regulations.

The document distinguishes between ownership of the configurator, ownership of reference templates and ownership of configured declarations. The owner of the configurator is not necessarily the owner of the reference templates and configured declarations.

## 2. DEFINING A CONFIGURATOR

Based on appendix P (informative) of standard NF EN15804+A2/CN, for the INIES programme, a configurator is a tool that enables environmental declarations to be generated easily from a reference template. A configurator can provide several reference templates.

A reference template is specific to a declarant or a group of declarants. It relates to one or more given applications and a given material (respectively level 3 and level 4 of the INIES nomenclature). A reference template cannot relate to a "material" alone. A reference template may relate to a family of multi-material products.

A reference template comprises all the data, calculation procedures and document templates required to produce an environmental declaration configured for a given product family. The reference template therefore takes the form of:

- One or more reference or "mother" declaration corresponding to the concept of a configurable declaration in the regulations,
- A set of variable parameters and calculation procedures used to adapt the reference declaration to generate a configured declaration
- A configured declaration template, which may comprise an automatically generated part and a part open to input by the configurator user.

The reference declaration can exist before the configurator. However, it must correspond to a particular configuration of the configurator and must therefore be able to be re-generated by the configurator using it as a reference declaration. A tolerance may be granted, particularly if the background database has been updated. For the climate change indicator, this tolerance may not exceed 1%. Beyond this, it is recommended that the reference model be updated. This reference declaration is an essential element in the registration of a configurator and the traceability of configured declarations.

### 3. DESCRIPTION OF THE DIFFERENT TYPES OF CONFIGURATORS

The configurator can be collective or individual:

- Collective: the configurator is owned by several declarants,
- Individual: the configurator is the property of a single declarant.

A declarant may be collective or individual:

- Collective: the declarant represents several marketers,
- Individual: the declarant is the only person marketing the product.

An environmental declaration may be the property of one or more declarants. An environmental declaration is the responsibility of the declarant(s).

A configurator can be internal or external:

- Internal: if its use is restricted to declarants who own the configured declarations,
- External: if its use is open to any type of user (whether or not they are a declarant).

Users of an external configurator may therefore not be the owners of the configured declarations. Consequently, in the case of an external configurator, a declarant (within the meaning of the regulations), whether individual or collective, must take responsibility for the environmental declarations configured. All environmental declarations must identify the declarant and therefore its owner. For an external configurator, this may not be the user of the configurator if he is not a declarant (or his representative) within the meaning of the regulations.

Finally, the configurators differ in the way in which the generated declarations are made available for use. A configurator that generates declarations that will all be recorded in the INIES database will be called a generator-only configurator. A configurator that generates declarations that are not all recorded in the INIES database will be called a generator and distributor or distributor.

The same configurator (tool) can be partially internal and partially external. The INIES programme is responsible for verifying all the operating modes of the configurators.

### 4. STEPS FOR VERIFYING CONFIGURED DECLARATIONS

A configured declaration is a declaration based on a configurable declaration within the meaning of the regulations. Verification of a configured declaration comprises 3 stages:

- Verification of reference templates and declarations, including verification of the configurable declaration (Chapter 5)
- Verifying the configurator (Chapter 6)
- Additional verification (if necessary; chapter 7))

**For a generator-only configurator**, the verification of configured declarations follows the normal verification and registration procedure like any other declaration. The **optional** prior verification of the configurator and reference templates can simplify the procedure for verifying configured declarations. In all cases, each declaration has an INIES programme registration number and its own verification certificate.

## 5. VERIFYING REFERENCE TEMPLATES AND STATEMENTS

Verification of a reference template must be requested by one of its owners. This includes verifying the reference declaration corresponding to this template. The same reference template, in the same way as a collective declaration, can be the property of several declarants and can be used by several configurators. Verification of a reference declaration must be requested by one of its owners. After publication, any declaration can become the mother declaration of a configurator. The reference template must then allow the configurator to re-generate this mother declaration.

Verification of a reference declaration follows all the rules of the INIES programme. Verification of a reference template includes verification of other elements of that template. Verification of the reference template therefore includes verifying the relevance of the reference declaration parameters and the accuracy of the calculation rules used to obtain the configured declaration from the reference declaration and the variable parameters.

Lastly, verification of the reference template covers the format and content of the configured declarations and, for example, the presence of the information required by the INIES programme (including non-LCA information) and the traceability of product parameters (thickness, composition, etc.) in the configurable parts of the declaration.

In addition to the usual information, the verification certificate for the mother declaration indicates for which configurator this declaration constitutes a configurable declaration. If the declaration has not previously been verified and registered as a reference declaration, it must undergo further verification of the reference template and be registered again, and its certificate must be updated.

The report on the verification of the declaration and the reference template must conclude whether further verification of each configured declaration is required. This conclusion must include:

- A list of variable parameters that can be selected or entered manually by the user of a configurator
- For each parameter, a description of the values that can be entered and the controls applied automatically
- Where applicable, a list of parameters requiring an additional check as part of an additional verification of the configured declaration. In this case, the verifier must specify whether the additional verification requires the skills of a verifier accredited by the INIES programme. If this is not the case, the declarant shall specify the skills required for the additional verification after consultation with the verifier and the programme operator.

## 6. VERIFYING A CONFIGURATOR

The verification of a configurator may be carried out by a different verifier from the one who carried out the verification of a reference template.

For an individual configurator, this procedure must be requested by the configurator owner. For a collective configurator, this procedure must be requested by one of the declarants who owns the configurator (whether this owner is a collective or individual declarant).

**This procedure is optional for a generator-only configurator, as each declaration is registered in the INIES programme and has its own verification certificate. However, this procedure makes it easier to verify the declarations generated by the configurator. It is also useful if the generator-only configurator is used by several declarants who want to use several different verifiers for additional verifications.**

#### Requirements common to all types of configurators

A configurator is verified for:

- The functionalities of the IT tool relating to compliance with regulations on environmental declarations
  - Restricting use to valid reference templates
  - Identification of the declarants responsible for declarations, as all declarants must be registered with the INIES programme (see registration of declarants)
  - The regulatory documents (declaration, verification certificate, verification report) for each configured declaration are made available to the market control authorities; some of these elements may be common to several configured declarations, particularly in the absence of additional verification
  - Compliance with configurator database specifications (storage of configured declarations and information on declarants and users)
    - Traceability of environmental declarations issued via a unique identifier, traceability of input data and management of updates
    - Compliance with archiving and retention rules: the configurator (or the owner of the configured declarations) must ensure that all configured declarations generated are retained for at least 5 years.
  - Preserving the integrity of reference templates:
    - Implementation of the calculation rules set out in the reference template
    - Parameter blocking functions (what cannot be configured must not be modifiable by the user) and validity of parameter variation ranges
    - Checking the input data (numerical value, min-max restriction, etc.)
    - Parameters taken into account in the information contained in the declarations

The verification of a configurator also includes sample tests on

- Diversity of applications (reference templates)
- Calculation algorithms and their applicability to all the configuration possibilities of the various reference templates
- Checking non-environmental data and its applicability to all configuration options: for example, validating the health aspects covered in the configured declarations, given the range of declarations that can be edited by the configurator.
- Reconstituting a calculation of key indicators for a series of products

#### Requirements specific to distributor generators (optional for other configurators)

Verifying the tool's IT functionality also includes validating the file formats generated and checking that the tags in the xml files have been filled in. To carry out this work, verifiers should refer to the best practice guide for filling in xml files with configured data, which is available on the [Carbon Data page: EHDS, PEP, DED, flat-rate packages](#) of the RT RE building website. This page contains the XSD format of the files to be generated.

### Verification certificate for a configurator

This configurator verification stage provides an overall validation of the configurator's ability to issue declarations that comply with the regulations if it is supplied with reference templates that themselves comply with the regulations. The verification certificate for a configurator is valid for 5 years. A configurator that no longer has a valid verification certificate can no longer generate valid declarations. On the other hand, a configured declaration generated by a configurator with a valid certificate remains valid even if the configurator subsequently no longer has a valid certificate.

## **7. ADDITIONAL VERIFICATIONS**

As a general rule, a configured declaration is considered to be verified when the configurator which generates it, the reference template and the reference declaration on which it is based have been verified. However, if a configurator allows a parameter (influential or not) to be entered manually without a consistency check or without limiting this parameter to a list of values provided in the calculation algorithm, the configured declaration must be subject to an additional verification. If the configurator also allows manual modification of non-environmental information contained in the declaration, additional verification is required (see appendix P of standard NF EN15804+A2/CN).

Example 1: If a configurator allows the composition of a product to be entered freely (without a consistency or plausibility check), this particular composition must be subject to an additional verification.

Example 2: If a parameter can take on unrestricted values, the plausibility of the value entered must be further verified.

It is the verifier of a reference template who determines whether configured declarations generated from this reference template should be subject to additional verification. Additional verification must be requested by the owner of a configured declaration. This means that for an external configurator, a declarant must take responsibility for additional verifications on declarations generated by users who do not own the configured declarations.

The additional verification must follow the procedure described by the reference template verifier. This additional verification may be carried out by a different verifier from the one or ones who carried out the verification of the configurator and the reference template.

If no further verification is required, the verification certificate for the reference declaration is used as the verification certificate for the configured declaration. In the event of additional verification, the certificate of verification of the configured declaration always mentions the configurator and reference template used. The declaration verification certificate also mentions the additional verification. Certification templates are provided in appendix F of the INIES programme regulations.

## **8. VERIFICATION BY SAMPLING**

Configurators can be used to generate a wide range of declarations. The verification certificate for the configurator and that for the reference template mean that the verification of each of the configured environmental declarations generated can be simplified (or even avoided in most cases).

For configured environmental declarations for which additional verification is required, the INIES programme may, exceptionally, authorise verification by sampling. The procedure must be validated by an INIES programme-accredited verifier and by the INIES programme Steering Committee. These last decide in particular whether it can be carried out by an independent third party not accredited to the INIES programme. To do this, it must be limited to parameters that are accessible and controllable by non-experts in LCA.

A sampling verification procedure is specific to a configurator and a declarant. It must be carried out annually. It leads to the production of a sampling verification report co-signed by the person carrying out the verification and an INIES programme-accredited verifier (when the additional verification is not carried out by an accredited verifier). This report is submitted to the programme operator by 31 January of year N+1 at the latest. The report includes a list of all the declarations verified by this procedure, together with their registration number in the INIES programme or in the configurator. This does not just refer to the sample of declarations verified, but to all the declarations covered by the sample. The verification certificate indicates the year for which the sample verification was carried out, the declarant and the mother declarations concerned. It therefore covers all the declarations generated by a declarant on the basis of the mother declarations mentioned for the year in question.

The procedure for verification by sampling must specify the action to be taken if anomalies are detected in the declarations generated during the year.

## 9. REGISTRATION OF DECLARANTS

All declarants owning declarations verified by the INIES programme must be registered with the INIES programme, whether or not the declarations originate from a configurator. For declarants filing declarations in the INIES database, this registration is a prerequisite for filing their declarations. In the case of declarants who use distributor configurators, they must be registered at the same time as the configurator. Declarant registration is mandatory, whether or not the declarant is responsible for declaring a reference template in a configurator (see Appendix M of the programme rules for details of declarant registration).

As with the dashboards for declarants who are not users of distributor configurators, the declarant area for users of distributor configurators contains a dashboard for declaring the reference templates used and storing the annual sample verification certificates if applicable.

## 10. REGISTRATION OF MODELS AND REFERENCE DECLARATIONS

Each reference template must be identified by one or more reference declarations registered in the INIES programme and filed in the INIES database. Each reference template has an identifier in each configurator that uses it. This identifier is specific to the configurator. Each configurator keeps an up-

to-date list of the reference templates it uses, with their internal identifier and the INIES programme registration number of the corresponding reference declaration.

The declarant who owns the reference template registers and registers the corresponding mother declaration. A reference declaration is a configurable declaration within the meaning of the regulations.

If the configurator is collective, the mother declarations can be collective. By default, a collective mother declaration registered and filed by a collective declarant indicates a reference template that can be used by the entity that this declarant represents.

If the collective configurator is also an external configurator, a reference template submitted by a collective declarant indicates by default a reference template which can be used by all users (whether or not they are declarants).

By default, a mother declaration registered and filed by an individual declarant indicates a reference template valid for that declarant only. Conversely, if a reference template is only valid for a particular declarant, then that declarant is responsible for registering it in the programme and for registering it in the INIES database.

## 11.CONFIGURATOR REGISTRATION

**This step is optional for a generator-only configurator.** For such a configurator, the owner of the configurator and those of the reference models deposit in INIES the information they wish the INIES database to store and ensure traceability of the verifications already carried out for the verifiers of the updates of the configurator and of the configured declarations when an additional verification is required.

The configurator is registered with the programme and the information is entered in the INIES database. The configurator can be registered by sending a document to the INIES database administrator as long as a dedicated interface is not available on the INIES database website. Otherwise, this information is stored in the configurator's database.

The following information must be provided for the configurator:

- Name
- Owners
- Information on the configurator specialist (Surname, First Name, EMail, Telephone if not a manager or user of a declarant account already declared)
- Name of verifier
- Configurator verification certificate
- Verification report
- Date last verified
- Validity end date
- An example of a configured declaration generated by this mode (PDF and xml files)
- The configurator's logbook including:



- The list of valid reference templates, their identification number in the configurator, the INIES registration number of the corresponding mother declarations and their validity end date
- For each valid reference template, whether or not the configured declarations should be subject to additional verification, and if so, the additional verification protocol (see registration of configured declarations)
- For each valid reference template, a list of configurator users who can use this template (by default, all if there are no restrictions)
- Traceability of IT changes to the configurator

This information, and in particular the configurator's logbook, is updated as often as necessary, and at least each time a reference template is added. The database (INIES and/or that of the configurator) must be updated at the same time.

Once this has been done, the configurator is given a programme registration number.

#### Validation of distributor configurators for RE2020

Recognition of a configurator that can be used as an RE2020 configurator follows the [procedure reconnaissance configurateur re2020 octobre 2023.pdf](#), available on the RT-RE Building website. The INIES programme registration procedure and the RE2020 recognition procedure have been merged to simplify the process for declarants.

Once the configurator and "mother" declarations have been registered, **configurator distributors** can receive their identification number for RE2020 supplied by the State, which corresponds to the *ConfiguratorCode* tag in the xml files generated.

## 12. REGISTRATION OF CONFIGURED DECLARATIONS IN THE INIES PROGRAMME AND REGISTRATION IN THE INIES DATABASE

**For a distributor configurator** registration and submission of configured declarations is not mandatory. If a declaration has to be filed in INIES, it is the declarant who is legally responsible for the configured declarations who registers them.

When registering a configured declaration in the programme, the verification certificate for the configurator and the reference declaration must be submitted with the other documents required for registration.

**For a generator-only configurator** each declaration has its own verification certificate with a registration number generated by the INIES programme.

**For a distributor configurator** each configured declaration has its own verification certificate. In the absence of additional verification, it is the verification certificate for the reference declaration from which it is derived. In the event of additional verification, the certificate of additional verification includes the configurator's registration number in the INIES programme, the registration number of the mother declaration in the programme and the unique identification number of the configured declaration, generated by the configurator. Any configured declaration recorded in INIES will also have an INIES programme registration number. For each reference or configured declaration filed in INIES, the declarant can request the creation of a link to the configurator.

The request to create this link is optional and must be made to [admin.inies@cstb.fr](mailto:admin.inies@cstb.fr) by sending the following information:

- List of declarations affiliated to the configurator for which you want this link to be present.
- URL address to which the link must refer to access your configurator
- Configurator name.
- The fee for creating the link is provided in appendix A of the INIES programme regulations.

### 13. IDENTIFICATION AND TRACEABILITY OF CONFIGURED DECLARATIONS

The INIES programme and the INIES database ensure the traceability of valid configurators and reference templates.

**For a generator-only configurator** the traceability of configured declarations is ensured by the INIES programme and the INIES database.

**For a configurator that generates and distributes** the traceability of configured declarations is ensured by the configurator or the owners of the configured declarations. The owners of the configurator or of the configured declarations manage the database of configured declarations. Each declaration has a unique identifier. The traceability system must be able to manage the archiving and end of availability of obsolete or erroneous reference models. The owner of the configurator must inform users of the configurator of any errors detected in a reference model or certain configured FDES.

### 14. VALIDITY DATE OF CONFIGURATORS, REFERENCE TEMPLATES AND CONFIGURED FDES

The verification certificate for a configurator is valid for 5 years and must be renewed periodically. In the absence of any major IT changes or the implementation of new reference templates, the periodic verification will focus in particular on the keeping of the configurator's logbook. If the configurator undergoes substantial modifications before the 5-year period, such as a declaration, this update must be verified (see table of configurator modifications).

The verification certificate for a mother declaration states the validity end date for this declaration. This is calculated in the same way as for any other declaration. The validity end date of the reference template carried by this mother declaration in the various configurators which use it corresponds to the validity end date of this mother declaration.

The verification certificate for a configured declaration indicates the validity end date of the declaration. This is the validity end date of the mother declaration.

### 15. VERIFICATION OF CHANGES TO CONFIGURATORS

The table below provides a non-exhaustive list of modifications that can be made to a configurator. It does not concern modifications to reference templates, which are subject to the rules for updating any environmental declaration (see programme regulations §5.10).

Any major modification (complete or otherwise) must be verified and the verification certificate updated. If there is a version numbering system for the tool, we recommend that you change the main version number of the configurator (e.g. from 2.4 to 3.0).

For a minor modification, the configurator's logbook must be completed. If a version numbering system exists for the tool, we recommend that you change the secondary or tertiary version number of the configurator (e.g. from 2.4 to 2.5 or from 2.4.1 to 2.4.2, depending on the extent of the change).

As with an environmental declaration, verifying complete major modifications to a configurator means that the configurator's 5-year validity period can be restarted at zero.

Type of modification	Extent of the modification (minor, major, complete major)
Correction of an error or bug without any change to calculations or functionality	Minor
Editorial modification of configuration (modification of labels, tooltips, order of settings, etc.)	Minor
Editorial modification of the PDF template for configured declarations (graphic charter, updated contacts, etc.)	Minor
Modification of the XML file for configured declarations required by regulations	Minor
Significant modification of the configuration settings (addition or deletion of a parameter, modification of the possible values of each parameter, etc.)	Major
Significant modification of the PDF template for configured declarations (addition of a co-declarant, modification of a section, addition of a section, addition of new editable sections/information, etc.)	Major
Significant changes to the configurator's functions	Complete major
Correction of an error or bug involving modification of the calculation code (coding error in the algorithm derived from a reference template, for example)	Major

## 16.SUMMARY OF CERTIFICATES AND DOCUMENTS

Document	Contents (non-exhaustive)	Role	Comment
Verification certificate for a mother declaration (= reference declaration)	Declaration name Name of declarant Declaration registration number Validity end date Name of the configurator(s) using this declaration as the mother declaration Possible users (single declarant/anybody/collective of declarants)	Certify that the mother declaration complies with regulations Serve as a basis for validating a reference template for a configurator Identify the possible users of this reference template	The mother declarations and the reference template are the cornerstones of this procedure.
Certificate of verification by sampling	Configurator name Name of declarant Registration number for mother declarations Configurator identifiers for the configured declarations concerned Year concerned	Certify compliance of configured declarations requiring additional verification	Procedure to be defined on a case-by-case basis with the verifier and the programme operator
Verification certificate for a configured declaration	Configurator name and registration number Registration number of the mother declaration INIES programme registration number if relevant Validity end date	Certify the regulatory compliance of a configured declaration requiring additional verification	
Configurator verification certificate	Configurator name Configurator owner Configurator registration number	Confirm that the configurator complies with the INIES programme	
Configurator logbook	Correspondence table between the registration numbers of the mother declarations in the programme and the reference template numbers in the configurator Correspondence table between reference templates and additional verification Correspondence table between reference templates and declarants List of major (mandatory) and minor (recommended) modifications to the configurator	Ensure traceability of changes to the configurator	
Declarants dashboard (distributor configurator users)	All relevant certificates Reference templates that can be used		

## 17.SUMMARY DIAGRAM OF THE PROCEDURE

