

APPENDIX J – INIES specific programme rules

Appendix version	December 2024
Previous version	December 2023

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

This chapter groups together the main decisions of the Steering Committee (at the date of updating of these rules) concerning the application of the programme's rules, whether they result from the interpretation or the need to specify the requirements of the standards or from the definition of operating rules specific to the programme.

J.1 Calculation rules relating to Module D (based in particular on COPIL decision N113)

The declaration of module D is mandatory for all FDES whose verification certificate is after 10/31/2022. The declaration of module D is mandatory for all FDES from 1/1/2025.

FD CEN/TR 16970 "Contribution of construction works to sustainable development - Guidelines for the application of EN 15804" mentions in §5.2.2 that "contributions to module D can only come from modules A4-C4". The requirement of standard NF EN 15804 "the costs and benefits associated with A1-A3 do not appear in module D" should therefore always be applied.

The verifier may accept a deviation from the "general rule", provided that he ensures that this tolerance relates to an issue limited to a few percent of the mass of the UF and that the assumption thus made is genuinely conservative (i.e. that it has the effect of slightly increasing the impacts of the FDES).

Clarification of definitions

Pre- and post-consumer material

In the context of standard NF EN15804+A2, taking into account the definitions in standard EN 45557, any material resulting from the recovery of a waste generated in modules A4 to C4 must be considered as a post-consumer material.

Based on the same standard, waste generated by a product system process (in A1-A3) cannot be considered as pre-consumer materials for this same product system. Consequently, a pre-consumer material from a product system cannot be taken into account in the calculation of the "use of secondary material" flow for this product system; it can, however, be included in the calculation of this flow for a different product system.

Standard NF EN15804+A2 (§6.3.5.2) considers that certain flows that have reached end-of-waste status are methodologically considered as co-products and others as recovered waste. It thus introduces a difference in the way post-consumer and pre-consumer materials are taken into account. Unless justified, pre-consumer materials must be considered as co-products of the product system that generates them, whereas post-consumer materials are considered as materials resulting from the recovery of a waste product. This paragraph seems to contradict the definition of co-product given by the standard (§3.8) since only waste should not be considered as a co-product. Waste that has reached end-of-waste status is, by definition, no longer waste and should therefore be considered a co-product.

For example, scrap wood from the prefabrication of a timber-framed wall in A3 is methodologically considered, in the current application of the standard, as a co-product and will be allocated part of the impacts of the production of the timber-framed wall. The same scrap generated on a building site (in A5) is considered as recovered waste, and will not be allocated any impact from the production of the timber-frame wall. Of course, these two flows can be managed differently (selective collection or mixed collection) but they can also be managed in the same way.

The INIES programme considers that clarification is needed on the definition of co-products and that it is not possible to provide this clarification without introducing into the rules of the INIES programme a significant deviation from standard NF EN15804+A2.

Outputs

The NF EN ISO 14044 standard defines the notion of output as being any flow that leaves a product system, whatever it may be. A co-product is therefore an output (or outflow) within the meaning of this standard. Paragraph 6.4.3.3 of standard NF EN15804+A2 indicates that the module D is calculated using the difference between the outgoing flow and the incoming flow (net flow) of the same material or secondary fuel. But this is only true if the outgoing flow does not come from A1-A3. The NF EN15804+A2 standard therefore considers that a co-product is sometimes an outgoing flow and sometimes not, for the purposes of calculating the D module.

For the INIES programme, this seems to mean that if a product system considers one of these flows as a co-product, then it can no longer consider it as an outgoing flow within the meaning of standard NF EN15804+A2 for the calculation of module D.

In the absence of clarification of the concept of co-product, the INIES programme proposes to clarify standard NF EN15804+A2 by considering that the outgoing flows are the outgoing flows (material or energy) from modules A4 to C4 contributing to the calculation of the "information describing the outgoing flows" within the meaning of standard NF EN15804+A2 (table 8, §7.2.4.4 of standard NF EN15804+A2).

Components for re-use	kg
Materials for recycling	kg
Materials for energy recovery	kg
Energy supplied externally	MJ per energy carrier

Similarly, for the INIES programme, incoming flows are the flows (material or energy) entering modules A1 to C4 which contribute to the calculation of information describing the following incoming flows (extract from table 6, §7.2.4.2 of standard NF EN15804+A2).

Use of secondary materials	kg
Use of renewable secondary fuels	MJ, net calorific value
Use of non-renewable secondary fuels	MJ, net calorific value

This clarification confirms the asymmetry between outgoing flows (A4-C4) and incoming flows (A1-C4) introduced by standard NF EN15804+A2, which must be taken into account when calculating net flows.

Clarification of the concept of net flows leaving the system or net outflows

For the calculation of module D, standard NF EN15804+A2 refers to the calculation of net flows leaving the system (§6.3.5.6), net outflows (§6.4.3.3 or D3.4) and net impacts (§6.4.3.3). For a given flow, its net flow corresponds to the difference between the outgoing quantity of this flow contributing to the calculation of the "information describing the outgoing flow" and the incoming quantity of this flow contributing to the calculation of the parameters describing the resources (table 6, §7.2.4.2 of standard NF EN15804+A2). The INIES programme proposes that a net flow is considered to be outgoing (or leaving the system) if the net flow is positive.

Calculation of Module D for FDES "A1" (EN15804+A1 FDES)

The Steering Committee considers that the preparation of FDES "A1", for which the verification certificate was issued prior to 01/11/2022 and which do not declare module D, has not necessarily made it possible to collect the information required to calculate module D.

Considering that these FDES will reach the end of their validity by 31/12/2025 at the latest, the Steering Committee authorises the declarants of these FDES to declare zero values in their module D. All these FDES will be authorised to carry out a minor update in the INIES database to complete the database without further verification. Modifying the PDF file of the FDES to add module D null is optional.

Since the declaration of a Module D with non-zero values must be verified, this declaration must accompany a major update of the FDES in A2 format and follow the requirements described below.

Clarification and details of the rules for calculating Module D for FDES "A2" (EN15804+A2 FDES)

Rule 1 - Calculation of the contribution of net flows to Module D

The contribution to module D is calculated systematically for positive net flows (corresponding to the notion of net flows leaving the system or net outflows). For negative or zero net flows, the contribution to module D can be either calculated or declared as zero.

Rule 2 - Introduction of a cut-off rule for packaging contributions to Module D

With regard to net outgoing flows relating to packaging, if these represent less than 1% of the mass of the reference flow (main product + additional products), the INIES programme authorises declarants to consider that these outgoing flows relating to packaging make a zero contribution to module D. The other cut-off rules defined in standard NF EN15804+A2 and its national supplement apply to module D.

Application date and update

This decision was submitted to the AFNOR P01E standardisation committee for clarification. Following this consultation, rule 1 was amended. With regard to the other points of clarification, the committee decided to address the questions to CEN TC350. This procedure may therefore be updated once the INIES programme has received a response from the standards bodies.

This decision is applicable from 15/11/2023 and the rules mentioned will be added to the INIES programme regulations.

J.2 Biogenic carbon

"Biogenic" carbon is the carbon that makes up plant matter, derived from the process of photosynthesis from CO₂ in the air. Under the RE2020 environmental regulations, this StockC indicator must be included in the FDES for the products concerned, and is expressed in **kgC/UF**.

J.3 Rules to use for declaring the end of life of wood products

For FDES for products incorporating wood, the rules and scenarios published by CODIFAB, in their updated version for use with standard EN15804+A2 and its national complement, must be used. Any other methodology or scenario considered must be justified in the FDES.

J.4 Phase B7

Some FDES include water used during implementation in phase B7, while others do not (e.g. piping). This accounting can be done in this way if the scenarios are clearly explained in the FDES.

J.5 Green electricity

The rules of the ISO 14067 standard: 2018 *Greenhouse gases - Carbon footprint of products - Requirements and guidelines for quantification* (§ 6.4.9.4 Electricity) must be used if green electricity is used in a project.

J.6 Prohibition of “Mass Balance Credits” and “Book and Claim” allocation principles

The use of different principles for allocating inventory flows to a product as part of a life cycle assessment is the subject of numerous discussions in European (in particular CEN TC350) and international standardization works. The allocation principles discussed are today strongly correlated with the principles of traceability of flows and the chains of custody put in place to guarantee this traceability. The ISO 22095:2020 standard describes different principles of chains of custody. The European Ecoplatform association, which brings together 24 major declaration programme operators, published two positions in February 2023 and December 2023 prohibiting, for the production of environmental product declarations, the use of allocation methods based on models of chain of custody known as “mass balance credits” and “Book and Claim” (see also appendix E). The use of these methods is not currently considered consensual. These positions reinforce the ban formulated by the INIES programme for several years. In order to remove any ambiguity, the INIES programme specifies that the “mass balance – rolling average percentage method” is authorized. The ban on “mass balance credits” and “Book and Claim” methods would be lifted if their use became consensual through the adoption of European or international standards on LCA or environmental product declarations in the field of construction.

J.7 Specific rules for producing FDES on non-collective wastewater treatment systems

All the rules specific to LCA of non-collective wastewater treatment systems are available in the ATEP guide "Methodological recommendations for carrying out LCA of non-collective wastewater treatment

systems " (<https://atep-france.fr/fr/recommandations-methodologiques-pour-la-realisation-des-acv-des-systemes-d-assainissement-non-collectif/>). Only the rules specific to FDES and non-collective wastewater treatment systems are set out here.

The functional unit can be formulated as follows: "To treat the pollution load of domestic wastewater received over the 50-year reference period by a non-collective wastewater treatment system with a nominal capacity of x Equivalent.Inhabitant". As a reminder, the volume of water treated is conventionally taken to be 2400m³ of water per Equivalent.Inhabitant (48m³ of water/inhabitant/year). The reference service life of a non-collective wastewater treatment system is 50 years.

The FDES can then be used for any pollution load less than or equal to the nominal capacity of x Equivalent.Inhabitant of the system.

The elements of the non-collective wastewater treatment system taken into account are: tanks, components, filter media and accessories (see the appendix to the ATEP guide for a detailed list, by type of system). These elements include some of the pipes upstream and downstream of the device. A length of pipe 5 m upstream and downstream of the device is included in the scope of the FDES.

In phase A5, a specific scenario concerning excavation work to install the device is proposed. To avoid any double counting at building level, the title of the EHDS must specify whether or not this work has been included in the FDES.

In the use phase, the consumables required for water treatment and the treatment of wastewater treatment residues (faecal matter) are considered to be taken into account by the environmental service declaration relating to the wastewater treatment service conventionally-defined by the State provided for a non-collective waste water treatment system. However, emptying the equipment and transporting the sludge to a treatment site should be included in the scope of the FDES. The environmental impacts relating to direct emissions from the wastewater treatment process and to the emission of water treated by the non-collective wastewater treatment system are not included in the scope of the FDES because they are also taken into account in the environmental service declaration relating to the wastewater treatment service conventionally-defined by the State.

For modules B2 to B5, the default service life of the device components are given in the ATEP guide (table 8). It is possible to use a lower service life than these default values, without justification, and higher service life with justification.

Module C covers the end-of-life of the components of the non-collective wastewater treatment system and includes a dismantling stage calculated in the same way as the installation stage.

The rules described above and in the ATEP guide are likely to change depending on the scope of environmental service declaration relating to the wastewater treatment service conventionally-defined by the State for the RE2020.

J.8 Use of specific data sets for raw materials sourcing

When a declarant wants to claim raw material supplies from specific suppliers, it is authorised to use data specific to that supplier (such as life cycle inventory, specific formulation, etc.). This supplier must be the issuer of this data set and the declarant must provide the verifier with:

- a signed statement justifying its specific supply and the stability of its supply during the validity period of the environmental declaration (see appendix K).
- proof from the supplier for the data set concerned (e.g. environmental declaration, LCA report, certificate of composition).

J.9 Specific rules for taking into account Blast Furnace Slags (BFS)

Cast iron and blast furnace slags are two co-products of the same manufacturing process. Following the Steering Committee decision of 23 June 2022, the impacts of the manufacturing process must be allocated on an economic basis. Any rule extending the system is prohibited. The value to be used for this allocation is 1.4% of the impacts allocated to blast furnace slags for the French market. To calculate impacts, generic life cycle inventories or specific data on the manufacturing process can be used. The allocation of impacts should remain 1.4% to blast furnace slag and 98.6% to cast iron.

Any further processing of blast furnace slags required for their use as a raw material in a construction product is allocated to blast furnace slags (transport, granulation, etc.).

The INIES programme also accepts the principle of taking into account the recarbonation of BFS in certain applications. The declarant must submit the necessary supporting documents and the calculation method used to the verifier.

J.10 Rules for producing FDES on green roofs

There are 3 possible approaches to environmental declarations for green roof systems:

- Declaration of one or more system elements only (drainage layer, filter, substrate, etc.)
- Declaration of a complete green roof complex without vegetation (drainage layer+filter+substrate, for example)
- Declaration of a complete green roof complex with vegetation (drainage layer+filter+substrate+plants, for example)

In the last two cases, the title of the FDES must clearly state whether or not vegetation has been taken into account.

Finally, where vegetation is taken into account, the type of vegetation must be clearly described in the FDES and all the stages in the life cycle of the plant must also be taken into account. Carbon storage cannot be taken into account if the rest of the plant's life cycle is not taken into account.

J.11 Use of set of JRC EF3.1 characterisation factors

Section 6.5.2 of standard EN15804+A2 states that the JRC characterisation factors must be used for all the indicators mentioned in its Appendix C, i.e. the EF3.1 set from the beginning of 2023. The characterisation method referenced in Appendix C of standard EN15804+A2 for climate change is not the same (IPCC 2013 instead of IPCC 2021) as that used in the EF3.1 set of factors. This method was used in the EF3.0 set. The difference mainly, if not solely, concerns methane emissions. The 3.0 set is therefore more unfavourable.

The INIES programme therefore recommends the use of factor set 3.1 and nevertheless tolerates the use of factor set 3.0 for all declarations subject to verification until 31/12/2023.

J.12 Harmonisation of the UF used for products used to form a liquid or gaseous fluid transport network (extract from Steering Committee document N112 approved on 30 June 2023)

The components of liquid or gaseous fluid transport networks can be declared:

- Separately (tubes, pipes, ducts, valves, taps, special tubes (L-shaped, T-shaped), junction boxes, etc.)
- In the form of a typical complete installation.

In the first case, the scope of the products covered must be clearly explained (diameters, shapes, etc.) as well as the possible applications for the product. In the case of range FDES, the range must be clearly explained and the rules applicable to range FDES must be complied with. The recommended functional units are the linear metre for pipes, and a number of parts for singular elements in the network.

In the second case, it is appropriate to use a functional unit based on the average linear metre of the network. The description of the UF must then indicate for which application the FDES can be used (water supply, gas supply, drainage, etc.) and for which type of structure (detached house, collective housing (small/large), tertiary office, etc.). The physical description of the UF must describe all the elements integrated into the average linear metre. It is recommended that all the information necessary for the correct selection and use of the FDES in the work be specified. In particular, the FDES must specify whether or not the elements used to attach the network to the building are taken into account, and the boundary between this network and the equipment connected to it. If a typical structure is mentioned, the conditions for using the FDES for other typical structures must be specified. These conditions of use must comply with the rules set out in the range's FDES.

This decision applies to all major updates or new FDES from 01/09/2023. For existing FDES, the Steering Committee recommends that declarants carry out a minor update to complete the required descriptive information.

Here are a few examples:

"A two-point valve with an inlet/outlet diameter of 20 mm for a water supply network with a service life of 20 years."

"One linear metre of 150mm diameter black water drainage pipe with a service life of 50 years. The FDES covers the length of the pipe and does not include the other elements of the network. It applies to our entire range of pipes with internal diameters from 80 to 150 mm."

"1 average linear metre of a methane supply network sized for a 110 m² detached house with a service life of 50 years. This FDES can be used without modification for any residential building with a habitable surface area of less than 200m². The standard work includes fixing the network to the building." The description of the UF should also include elements such as "The installation includes 1 tap-closed draw-off point per 10 linear metres of pipework. It does not include the pipes used to connect equipment to the network (hob, boiler, etc.). It includes 20 ml of pipe, 2 valves, x clamps and fixing lugs and y screws."

J.13 Best practice for drawing up an environmental declaration for a reused product

A reused product is a product that has already had a 1st life in use. As a result, this excludes products/surpluses from construction sites, end-of-stock items, etc.

Justifying the use of a declaration of a reused product: to be able to use the declaration, it will be necessary to justify the correct correspondence between the product covered by the declaration and the reused product used: proof of reuse, traceability to the worksite, performance after repackaging of the product, justification of the service life.

How do you prove that the product has been re-used? You have to prove the source of the product and its traceability. The waste diagnosis carried out during the deconstruction/renovation of a building can be used as proof.

Rules for calculating an FDES for a reused product**A1-A3:**

- The A1 module is conventionally taken to be zero. Any additional products required are counted in A3
- A2: If the temporary storage site and the reconditioning site are different, transport from the dismantling/renovation/maintenance site to the temporary storage site is considered to be part of the 1st life cycle, and transport from the temporary storage site to the reconditioning site is considered to be part of the 2nd life cycle. If the temporary storage site and the reconditioning site are identical, transport from the worksite to this single site is considered to be attributed to the 1st life cycle (justification must be provided). Attribution to the 1st life cycle results in zero impact for the reused product. It is also possible for the product to be transported from the removal/deconstruction site directly to the new construction site. In this second case, the average transport between 2 sites must be allocated to the 2nd life cycle, from which the C2 transport from the 1st life cycle (new product) is deducted. If this deduction results in a negative value, the impact is considered to be zero.
- A3 - Product reconditioning: by "reconditioning" we mean all the actions/processing required to give the product a second life. Module A3 includes: the treatments required for a second life in use (e.g. relacquering, cutting a wooden beam to length, sandblasting, cutting, welding, shot blasting, replacing/repairing a component, etc.), as well as the packaging required for reconditioning.

A4-A5:

- A4: Transport from the reconditioning site to the construction site is taken into account (for the second life in use).
- A5: Handling equipment (e.g. lifting cranes), consideration of auxiliary products for implementation, end-of-life treatment of off-cuts on site and packaging. Identical to the new product, or different in the case of a justified reduction in impact.

B1-B7:

Where the environmental declaration for the new product exists, the same scenario as that used in the declaration is used. The new product and the reused product must be similar and have the same technical performance. A different scenario may be used if different data are available. Justification must be provided.

If there is no environmental declaration for a new product, the same methodology should be used as would be applied for a new product.

C1-C4:

Where the environmental declaration for the new product exists, the same scenario as that used in the declaration is used. The new product and the reused product must be similar and have the same technical performance. A different scenario may be used if different data are available. Justification must be provided.

If there is no environmental declaration for a new product, the same methodology should be used as would be applied for a new product.

D:

Module D is calculated as for a new product, in line with the scenarios used in modules C1-C4.

J.14 Taking into account complementary products for installation

Taking into account the different wording proposed in the NF EN15804+A2 standard and its national supplement, the INIES programme considers that taking into account complementary products is not mandatory. If the complementary products are not included in the scope of the FDES and if complementary products are essential for implementation, then the title of the FDES must explicitly state that the complementary products are not included and the FDES must mention (for example in its fitness for use section) the type of complementary products necessary. The mention “hors produits complémentaires de mise en oeuvre” can for example be used to complete the title of the FDES. This rule applies retroactively.

J.15 FDES of systems whose components have different lifespans

The use of an FDES relating to a system made up of components with different lifespans can lead to differences in results (compared to the results obtained by considering the FDES of the components separately) when applying the simplified dynamic method of the RE2020. It is therefore recommended not to carry out this type of FDES. If an FDES is carried out on this type of system, the declarant must ensure that the RE2020 calculation carried out with this system FDES leads to a conservative result compared to carrying out this same calculation with FDES taken separately for each component.

J.16 General principles on the choice of background datasets

When multiple background datasets are available to perform an FDES, there may be disagreement between the declarant and verifier on which dataset to use.

The following requirements should only apply if the choice of dataset leads to a significant difference (10%) in the results of the main environmental indicators and in particular the indicator on climate change.

The declarant and the verifier must jointly carry out a quantitative data quality assessment of the different datasets. The dataset with the best quality should be preferred. In the event of disagreement on this assessment or no difference in the level of quality of the datasets, the INIES programme prioritizes preferences for the use of the datasets:

- A specific dataset (from the market) is preferable to a generic dataset if this specific dataset does not include a major methodological deviation with the NF EN15804+A2 standard and its national complement. The INIES programme considers that the use of specific data only prevails if this data complies with the methodological requirements of these standards.
- Between generic datasets, the most conservative dataset is preferable.

J.17 Use of an FDES from declarant A by declarant B (extract from Steering Committee document N087 approved on 7 October 2022)

Context

Declarant A manufactures a product P_A for itself and a product P_B identical or very similar to P_A on behalf of declarant B, which distributes P_B under its own trademark. Declarant A has produced the FDES for product P_A . Under what conditions can declarant B use the FDES for product P_A for product P_B ? (P_A and P_B can be completely identical)

This case covers, for example, the marketing of products manufactured by third parties under private label and the marketing by an importer/distributor specific to the French market of products not

marketed in France by their manufacturers. In both cases, declarants often do not want the manufacturer's name to appear on the declaration.

Decision

The INIES programme authorises declarant B to use the declaration made by declarant A as the basis for the declaration of the P_B product under the following conditions:

- Declarant A must have a certificate of compliance with French regulations for the environmental declaration of the P_A product
- Declarant A must be informed of the use of its declaration and all or part of the supporting documents used (for P_A) by declarant B in the declaration of the P_B product
- Declarant B must draw up its own regulatory declaration and carry out its own publication procedure in INIES
- Declarant B must have its own declaration verified by an independent third party:
 - a. an authorisation from declarant A for the use of the declaration of product A and any other supporting documents used for the declaration of product A
 - b. a certificate proving that the manufacture of P_B is identical or very similar (impacts varying by less than 10% on A1-A3) to that of P_A
 - c. a study proving that the scenarios used for P_B from A4 are identical to those used for P_A or do not lead to differences in impacts of more than 10% over the total life cycle.
 - d. Ideally, proof of suitability for use, performance, sanitary information or contribution to various comforts should be specific to P_B. Otherwise, see point a).
- The documents mentioned in points a) to d) above must be available for consultation on request by the INIES programme operator and by the market supervisory authorities. As such, the documents mentioned in points a) to c) must be deposited in INIES as documents accompanying the FDES (as an "verification report" so that they are not publicly available).
- The verification procedure may be simplified and relate solely to the documents mentioned in points a) to d) above.
- The verification report must mention the checking of the parts mentioned in points a) to d) and must clearly mention the verification certificate for the P_A product.
- Declarant B must indicate in its declaration the place(s) of manufacture (address of site(s)) of its product; the name of manufacturer A is optional)

J.18 FDES produced by the importer or distributor of the product rather than by the manufacturer

The importer or distributor may make the environmental declaration for a product in place of the manufacturer. The FDES must comply with the same requirements whether it is produced by the manufacturer or another player in the value chain. In particular, the structuring of the lifecycle into modules must be maintained. A3 remains the module covering the manufacture of the product and module A4 its distribution. Module A3 must comply with specific data requirements. The use of specific data in A4 by a distributor declarant does not replace the obligation to use specific data also in A3.

J.19 FDES for modular buildings

Systems considered as buildings that must meet the requirements of the RE2020 are not within the scope of the INIES programme.

J.20 Ban on extrapolation tables (decision N114 of the COPIL of 06/30/23)

The INIES programme recognizes individual FDES relating to a product or a range of products and collective FDES. Range FDES meet similar requirements to collective FDES and must include a validity framework. This validity framework does not provide for the extrapolation of the declared values to other products in the range. The INIES programme does not provide any verification rules for extrapolation rules for any environmental declaration whatsoever.

An FDES cannot therefore include any rule for extrapolation to other products. Tables containing values to extrapolate the environmental indicators of a product from the FDES of another product are therefore prohibited in the FDES.

Configurators can help meet the need to quickly create a FDES for different products in a range. A declarant can also produce several FDES to cover each of the products in a range or section it in order to cover each section with an “majorating” FDES.

This decision applies retroactively; updating the PDF files of the FDES concerned may be required.

J.21 Primary data collect

Special case of innovative products (based on COPIL decision N123 of 29/09/2023)

In order not to block the production of environmental product declarations for products newly placed on the market, declarants have asked the INIES programme if it was possible to derogate from the rule on the need to have primary data covering at least one year of production in order to produce an environmental declaration.

The NF EN15941 standard enables such an exemption. The COPIL INIES therefore authorises declarants to derogate from the rule:

- Production data must cover at least 6 months of production,
- The validity of the declaration will be limited to 2 years. At the end of this period, the declaration must be updated with production data covering at least one year of production.

This decision applies to products newly placed on the market, whether they are new products or changes to existing products (changes in composition or process). This decision does not replace the obligation for the declarant to update his declaration in the event of a significant change in environmental performance (standard NF EN15804+A2, §9).

Special case of non-continuous production

Some products are not produced continuously (production only at certain times of the year, production on demand). Standard NF EN15804+A2 specifies (§6.3.8.2) that datasets must be based on data averaged over one year. The INIES programme therefore considers that it is possible, while remaining compliant with standard NF EN15804+A2, to average data from non-continuous production over one year. In these situations, the declarant must prove that the production conditions are controlled and stable over time.

J.22 Additional information content in a FDES (optional item described in appendix K of standard NF EN15804+A2/CN)

By decision of the COPIL of 21/03/2024, the following information is not authorised in the additional information:

- the value of a global warming indicator calculated using the simplified dynamic method of the RE2020, as this could lead to misuse of the data and calculation discrepancies at building level
- biogenic carbon content which is already reported elsewhere in the declaration and for which reporting is not optional
- duration of biogenic carbon storage, since this corresponds to the reference lifetime of the product already declared elsewhere,
- tables of values for other products in the same range: if the FDES is an individual FDES for a range, then the declared value already covers the entire range, otherwise these tables are considered to be tables extrapolating the FDES to other products, tables already prohibited by COPIL decision N114.
- by extension, any value of an environmental or flow indicator not provided for in the product category rules.

J.23 Use of data provided by the INIES programme on the environmental impacts of the end-of-life packaging

Since October 2024, the INIES programme provide data on the environmental impacts of the end-of-life of the main packaging materials. This data can be accessed on request from the INIES programme inies@hgegb.org, accompanied by the signed conditions of use (available in the resources section of the www.inies.fr website). These datasets can be used to produce FDES and configurators that comply with the INIES programme rules. They are valid only for the French market. They can be used as default data for the packaging concerned. The rules for the correct use of these data are specified in the accompanying methodological report. Their use is neither compulsory nor essential for compliance with the INIES programme rules; its sole purpose is to simplify the process of producing and verifying FDES.