Japan EPD Program by SuMPO

System Certification Rules
(General Rules, Requirements, and Procedures)

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Sustainable Management Promotion Organization

Revision history

Version	Date	Page	Details
04	April 1, 2022	-	Modifications due to changes in the program operator.
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02	February 16, 2018	20	Move terms and definitions in Appendix B to the General Program Instructions
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These rules specify certification of the Japan EPD Program by SuMPO System (the “System”), one of the verification methods within the Japan EPD Program by SuMPO (the “Program”) operated and administered by the Sustainable Management Promotion Organization (“SuMPO”).

Section 1 General Rules

1.1 System Certification Method Overview

Organizations that wish to make a declaration using the system certification method in the Program must obtain certification through a system certification body registered with SuMPO.

Application for registration and publication of declaration through internal verification conducted within the organization is permitted once the applicable system is certified and registered on the Program's website.

1.2 Requirements

Requirements for systems within the system certification method are set forth in “System Certification Requirements” of Section 2 of these rules. Other supplementary requirements are to be set forth separately by the system certification body.

1.3 Criteria

System certification criteria are set forth in “JR-09S System Certification Criteria”. Other supplementary evaluation criteria are to be set forth separately by the system certification body.

1.4 Procedures

The procedures for system certification are set forth in “System Certification Procedures “ in Section 3 of these rules. Other supplementary procedures are to be set forth separately by the system certification body.

1.5 Assurance Level

The verification assurance level should be “limited assurance level” based on the nature of life cycle assessment (LCA). Assurance level is a term originally used in accounting audits, and is classified into “absolute,” “reasonable,” and “limited” assurance levels. Absolute assurance level is when an auditor works with a business to check whether its operations conform to specifications and standards to guarantee its complete conformity; however, such a guarantee is not realistic in this Program.

Reasonable assurance is the level of assurance generally applied when an accounting firm audits an organization's annual financial statements. The auditing firm tracks the data sources, etc., that serve as the basis for financial statements and other documents submitted by the business to extent that such tracking is possible. Verifying such documents requires a considerable amount of verification work, as they require accurate disclosure of corporate information and may impact stock prices as well. The greenhouse gas (GHG) credit system requires this level of assurance because the value is converted into money.

Limited assurance level means that data verification is conducted with limited information and materials provided by a business, and its level of assurance is therefore limited. The nature of LCA makes providing a reasonable assurance level for all data impossible, since data from outside the company (supply chain) is used and there are cases in which secondary data is obtained even for in-house data because primary data is unobtainable, meaning that data verification at a reasonable

assurance level is not always suitable for actual conditions. Meanwhile, it is of course necessary to check data on environmental impact factors carefully even at a limited level of assurance, as these account for a large portion of the ratio.

1.6 System Certification Audit

Whether a system established within an organization wishing to certify the system conforms with the requirements is determined after an audit by the certification body and confirmation by a SuMPO review panel.

1.7 Period of Validity of System Certification

The period of validity of system certification shall be three years. However, it is valid as long as the extension procedures in 1.8 are carried out during the validity period. If the business wishes to continue its certification within the period of validity, it can apply to the system certification body for renewal.

1.8 Maintenance Audit

The system certification body must conduct a maintenance audit to confirm the validity of the certified system.

1.9 Observations by SuMPO

SuMPO may request to observe system audits when deemed necessary.

1.10 Revocation of Certification

The Program secretariat and system certification body may revoke certification granted to a business if any violation is discovered.

Section 2 System Certification Body Requirements

0.1 Introduction

Establishing and operating the System in accordance with these requirements is expected to bring the organization the following benefits compared to the product-by-product verification method.

- Quantification, verification, and publication can be performed in a shorter period of time.
- The procedures up until registration of declaration can be made regardless of the timing of the application.
- Multiple products can be declared at a lower cost.
- Systems for evaluating environmental impact can be established within the organization, enabling a variety of internal applications.

These requirements were also developed to allow for the establishment of a management system integrated with other management systems, such as environmental management systems and quality management systems. This means organizations that have already established another management system can use that system as a basis for establishing a system that conforms to these requirements.

The structure of the requirements is shown in Figure 1. The requirements are broadly classified into: “Planning” for declaration, “Quantification” for the collection and quantification of life cycle data, “Publication” for disclosure/revision after verification, and “System Foundation” that serves as the foundation for the overall system.

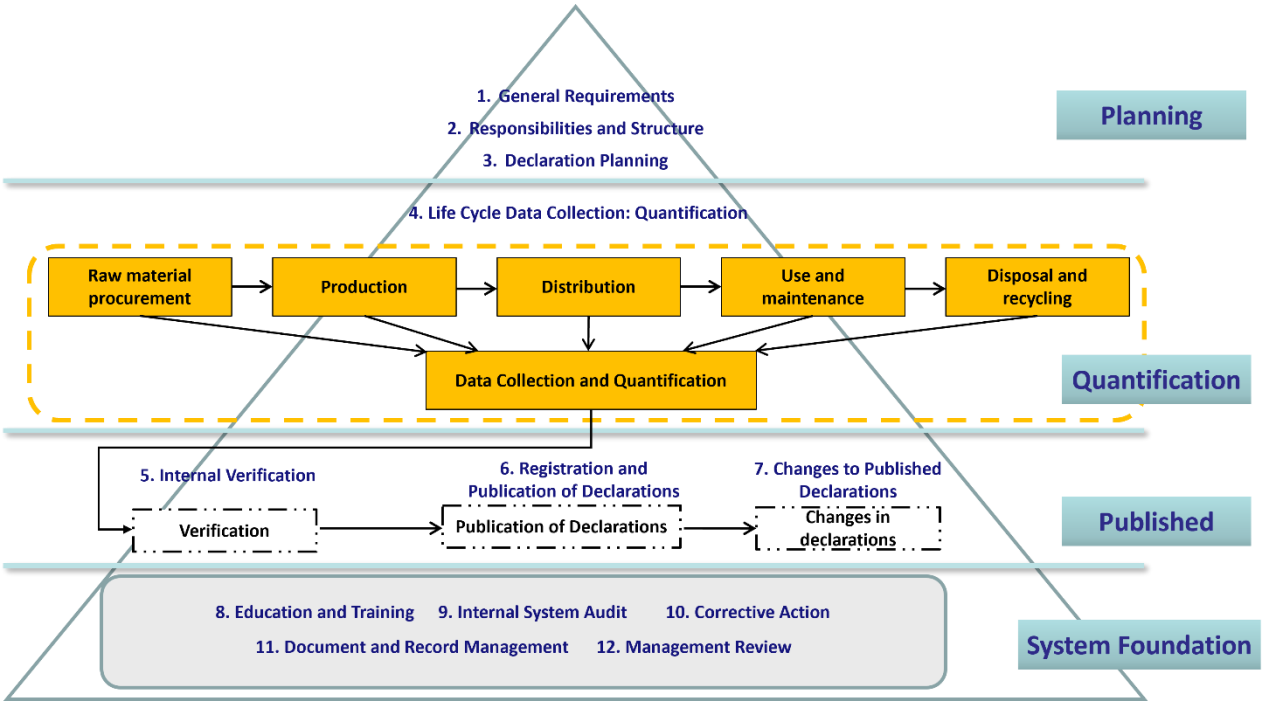

Figure 1. Structure of requirements

0.2 Scope

These requirements apply to any organization with PCR participating in the Program regardless of type, style, scale, product, or service.

These requirements are not intended to establish standards or criteria based on laws or regulations.

0.3 Cited Standards and Guidelines

The documents listed below form part of these requirements when cited therein.

a) General Program Instructions
b) Quantification and Declaration Rules
c) PCR of target products
d) Verification Criteria
e) Rules for Registration and Publication of Declarations, and Usage of Marks
f) Registered Reviewer/Internal Verifier Registration and Evaluation Rules

1. General Requirements

The organization must establish, document, implement, and maintain the System in accordance with these requirements. The system must comply with and ensure implementation of the applicable PCR requirements. When applying, the organization must fulfill the following:

- The organization has a track record of successfully passing product-by-product verification for the type of declaration it is applying for (EcoLeaf or CFP).
- The scope of the system is clearly stipulated, and the target PCRs have already been certified.
- The organization clarifies the scope of application of the system (target product groups and organizations) based on eligible products and applicable PCR.

The system may be established independently or incorporated into another management system.

2. Responsibilities and Structure

The organization must define in writing the roles, responsibilities, jurisdiction, and implementation system for performing quantifications and declarations, including the following items.

2.1 Top Management

a) Prepare resources essential for system operation. Resources include human resources, professional skills, technology, and funds.
b) Set and enforce policy, including commitments on the objectives of the Program and the credibility of its human resources, etc.
c) Appoint a manager and give this manager the roles, responsibilities, and authority listed in “2.2 Manager” below.

2.2 Managers

a) The manager shall establish, implement, and maintain the System in accordance with these requirements.
b) The manager will report system status to top management.

3. The manager shall promote understanding of the Program among all employees involved in the scope of the System, regardless of whether they are part of the organization. The manager should also strive to increase understanding of the Program among data providers and consumers. Declaration Planning

The organization must, when conducting individual quantifications, draft a plan to clarify the target of the quantification. The organization should revise this plan as needed to reflect any changes.

a) Target products
b) Applicable PCR

4. Life Cycle Data Collection: Quantification

4.1 General

The organization must clarify what data will be collected during each stage of the life cycle as well as establish, document, and implement procedures that allow for the collection and quantification of reliable data based on applicable PCR.

The organization must prepare the following, including clarifications, to ensure reliable quantification.

a) Components (raw materials, parts, etc.), and materials of the target product
b) A life cycle flow chart that clarifies the life cycle stages of the target product and the process for collecting data
c) Specific conditions and rules for each stage required for quantification
d) Application for use of available data

The organization should establish processes to enable the collection of necessary data at each stage.

4.2 Request for Data Collection

The quantifier must ensure the following when requesting data collection.

a) When requesting data collection from relative departments within an organization or data providers outside the organization, the quantifier shall provide a written document on the scope and accuracy requirements for data collection. The quantifier shall provide explanations or take other measures as necessary to ensure the collection of data.
b) The validity of requested items shall be confirmed before the request is made to a data provider.

This may be omitted if a process for continuous data collection is established.

4.3 Data Collection and Provision

The data provider must implement the following when providing data:

a) Collect the necessary data based on request and provide it without delay in written form (paper or electronic) to the quantifier.
b) Inquire with the quantifier immediately should any questions arise to clarify the content of the work.
c) Reconfirm validity and receive approval from the person in charge, and then provide data with the person in charge clearly written to the quantifier.
d) Be able to explain the accuracy and validity of the data (including validity of the instruments used).

The quantifier must take care to provide the necessary time and information when the data provider is outside the organization to ensure that the data provider performs the items listed above.

4.4 Quantification

The quantifier shall confirm validity and quantify the collected data.

The quantifier must also ensure the following when performing quantification.

a) Create the necessary documents for internal verification.
b) Organize and manage evidence for data related to quantification.

4.5 Creating Declarations and Marks

The organization must create the appropriate documents for the verification application in accordance with the applicable PCR and “Quantification and Declaration Rules” based on the quantification results.

5. Internal Verification

When making a registration and publication of declaration, the organization shall conduct an internal verification using an internal verifier to show that the contents of the verification application meet the following items a) through c).

a) Conforms to the appropriate version of the applicable PCR.
b) Conforms to the appropriate versions of the “General Program Instructions” and “Quantification and Declaration Rules”, which serve as the rules of the Program.
c) The data collection and quantification have been conducted according to established processes based on “4. Collection and Quantification of Life Cycle Data” of these rules.

The organization shall ensure the following when conducting internal verification.

d) The internal verifier is someone registered with SuMPO in accordance with the “Registered Reviewer/Internal Verifier Registration and Evaluation Rules”.
e) The internal verifier has knowledge of LCA and this Program and has the competence to conduct data collection and quantification.
f) The internal verifier understands the “Quantification and Declaration Rules” and “Verification Rules”, which are rules of the Program.
g) The internal verifier is independent of the data provider, quantifier, and entity who created application for verification of the product in question.
h) The internal verifier records verification results as a Verification Results Report. The records are available to trace evidence of products and collected data.
i) The verification results are reported to the manager.
j) The responsibility for the verification results lies with the organization, even when verification has been outsourced.

6. Registration and Publication of Declarations and Usage of Marks

When publishing the declaration outside the organization, the organization must agree to the rules on preventing unauthorized use of the Mark and obtain permission for the registration and publication of declaration.

In applying for registration and publication of declaration, the organization must clarify the procedures, roles, responsibilities, and authority of the application.

7. Changes to Published Declarations

The organization must monitor the need for changes to the content of the registration and publication of declarations, perform verification and other procedures as necessary, and notify SuMPO of any changes and the reasons for them. The criteria and procedures for changes shall

follow the Registration and Publication Rules.

8. Education and Training

Personnel directly engaged in systems (quantifiers and internal verifiers) and internal system auditors must have the competence to perform their tasks. To ensure competence of personnel, the organization must provide appropriate education and training on the Program and LCA or provide personnel certification internally based on their experience.

The organization should provide the necessary education to data providers on the Program in general and LCA data collection methods.

9. Internal System Audit

In order to maintain this system, the organization must conduct internal system audits using internal system auditors at predetermined intervals to show that the following items a) to c) have been met.

a) The organization's system conforms to these requirements.
b) It conforms to the SuMPO Environmental Labeling Program System Manual (the "Manual") established by the organization.
c) The system has been implemented and maintained in a systematic manner.

The organization must meet the following requirements when planning and implementing internal system audits.

a) The internal system auditor has knowledge of this Program and has the competence to conduct a system audit.
b) It ensures objectivity and impartiality in the audit process when selecting internal system auditors and conducting audits.
c) The internal system auditor is not auditing their own work.
d) The internal system auditor records the results of the audit.
e) The audit results are reported to the manager and to top management.
f) The responsibility for the audit results lies with the organization, even when the internal system audit has been outsourced.

10. Corrective Action

If a nonconformity is discovered through internal verification, an internal system audit, or a system certification audit by a system certification body, or after registration and publication of declaration, the organization shall identify and correct the nonconformity, and then take action to eliminate its cause.

The organization must review the efficacy of the corrective actions taken. The results of corrective actions must also be recorded.

11. Document and Record Management

11.1 Management of Documents

The organization shall create, maintain, and manage the documents necessary for structuring these requirements. The organization shall ensure that the appropriate version of these documents is used.

When creating and maintaining documents, the organization shall refer to the appropriate version

of the necessary documents listed below.

a) General Program Instructions
b) Quantification and Declaration Rules
c) System Certification Rules
d) Rules for Registration and Publication of Declarations, and Usage of Marks
e) Registered Reviewer/Internal Verifier Registration and Evaluation Rules
f) Other Program-related documents
g) Application documents
h) Applicable PCR

11.2 Management of Records

The organization shall create records that include the following items as evidence of conformity with requirements and accuracy of their declaration, and these records must be stored for an appropriate period of time in a state that is easily retrievable.

a) Declaration planning documents
b) Quantification preparation documents
c) Application documents
d) Data collection results at each stage
e) Data collection evidence
f) Internal verification results
g) Internal system audit results
h) Education and training records
i) Corrective action records
j) Instrumentation management documents
k) Management review records

12. Management Review

Top management shall review the system at predetermined intervals to ensure that the system continues to be appropriate, valid, and functioning effectively.

Input to the management review should include the following items.

a) State of quantification implementation and registration and publication of declaration
b) Declaration Planning
c) Audit results
d) State of communication with stakeholders (e.g., feedback)
e) State of corrective action
f) Follow-up on the results of the last management review
g) Change in impact category indicators
h) State of changing circumstances
i) Improvement proposals

Output from the management review shall include decisions on policy and the necessity of system changes.

13. Extended Scheme System

Systems that have received prior certification from the auditing agency as having an appropriate

operation and management system (13.2) may add new organizations at any time within the organizational scope of the system if the following conditions (13.1) are met. This method is called an Extended Scheme System.

13.1 Requirements

The following requirements must be met in order to receive Extended Scheme System certification.

a) It conforms to the items specified in these requirements up to 12.
b) The organizations to be added are systematically organized and ascertainable.

13.2 Operation and Management

The Extended Scheme System shall be operated and managed in the following manner.

a) The organization shall be operated and managed by someone with systems that can operate and manage the organization properly (the “Operation Manager”).
b) The Operation Manager shall record and manage information on the organization’s declarations as needed to conduct declarations appropriately and smoothly.
c) The Operation Manager shall establish procedures to verify that the requirements in 13.1 of this section are met, verify that systems of organizations added conform to 13.1 of this section, and add organizations confirmed to be in conformity with the system.

13.3 Application and Audit

The following procedures for application and audit of the Extended Scheme System shall be followed.

a) The application for Extended Scheme System certification and the application for the registration and publication of the declaration shall be made by the Operation Manager based on the consent of the organizations that comprise system.
b) When applying for Extended Scheme System certification, documents describing in detail the methods in 13.2 to be implemented by the Operation Manager and typical organizations (at least one) eligible for the system shall be audited by the audit body.
c) Organizations added shall receive confirmation as to the validity of their added by the certification body during the nearest audit (maintenance or renewal) after the addition.

Section 3 System Certification Procedures

1. System Certification (New Application)

1-1. System Certification Audit

(1) An organization wishing to make a declaration under the system certification method (the “Applicant”) must, after establishing and operating a system, submit a system certification audit application to a system certification body registered by SuMPO and undergo an audit.

(2) The system certification body shall send the system certification audit application received from the applicant to SuMPO, verify the content of the application, and, if an audit is possible, discuss the audit procedures, etc. with the applicant.

(3) The system certification body shall create an audit plan based on the discussions with the applicant and send it to the applicant and SuMPO.

(4) The system certification body shall conduct a stage 1 and stage 2 audit and create an audit report.

Stage 1 audit

- **Document audit** in which manuals and other documents created by the applicant organization are reviewed in advance
- **In-person audit** in which manuals and system establishment status are verified

Stage 2 audit

Verifies whether the applicant organization is operating the system according to the manual.

- The **main audit**, in which the validity of the internal verification of declarations quantified using the system is verified
- **Site audit** at sites collecting primary data

(5) The system certification body conducts an internal review based on the audit report and creates a report based on the results of this internal review.

(6) The system certification body shall send the following documents to SuMPO, and SuMPO shall verify them at a Review Panel established by SuMPO:

- ✓ System certification audit application
- ✓ Audit report
- ✓ Review results report
- ✓ System certification criteria conformity checklist

(7) The system certification body shall make a decision on certification or re-auditing based on the results of (6) and notify the applicant.

(8) The system certification body shall issue the certification document in the case specified in (7).

1-2. System Registration

(1) Upon issuance of the system certification document, the applicant shall submit to SuMPO a copy of the certification document and the system registration application containing the following information.

a) Name of the system certification body that received the audit
b) Date of system certification
c) Period of validity of the system

d) System certification number

(2) SuMPO shall review the application for system registration, and if SuMPO deems that the applicant meets the requirements for registration, it will notify the applicant of its system registration number and post it on the Program website.

(3) The applicant shall perform procedures for quantification, verification, and publication of registration based on the system registered.

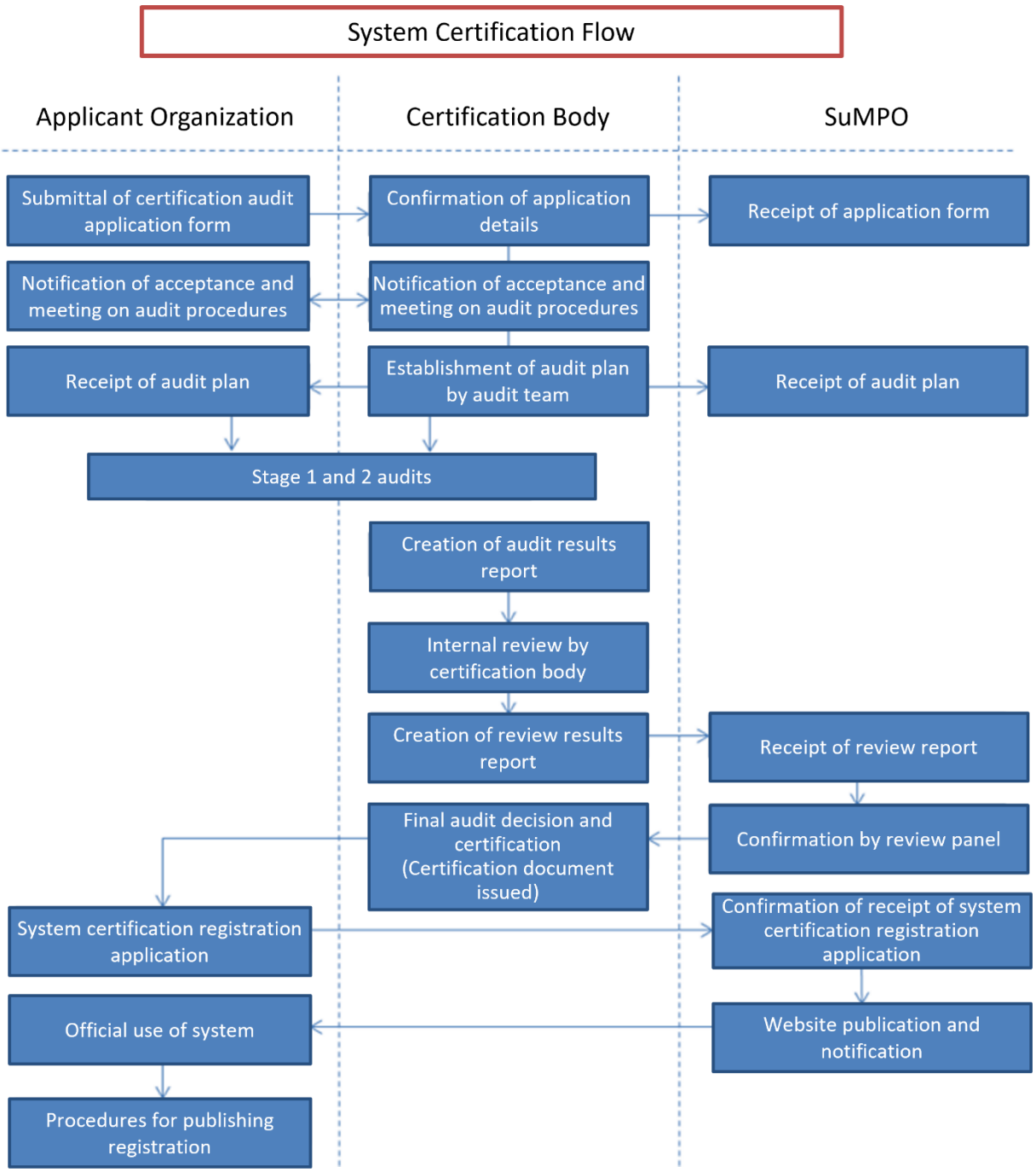

Figure 2. System certification flow

2. Post-Registration Procedures

2.1 Renewal Audit

(1) System registrants who wish to continue their registration must submit a system renewal application to the system certification body and complete the renewal procedures during the period of validity of the system. The system certification body shall send SuMPO the system renewal application received from the registrant.
   - ✓ The system renewal application may be submitted six months prior to the end of the period of validity of the system.

(2) The system certification body shall perform the same procedures as the initial audit (1-1, (2) to(7)), and, when the system is certified, issue a certification document.
   - ✓ The date of the certification in such cases shall be the date of certification for the renewal audit, and the validity period of certification shall be three years from the existing deadline.

(3) The system registrant who received certification in the renewal audit shall submit a copy of the certification document and the renewal application to SuMPO.

(4) SuMPO shall change the validity period of the system on the Program website based on the application.

2-2. Change Audit

(1) System registrants who wish to change the scope of application for the system (change or add a target product, type of declaration, or organization, etc.) shall submit a system change application to the system certification body and undergo procedures for change. The system certification body shall send SuMPO the system change application received from the registrant.

System changes may be made during system maintenance audits or renewal audits.

(2) The system certification body shall perform the same procedures as the initial audit (1-1, (2) to(7)) on the changed portions, send a notification of the results, and, when the system is certified, issue a certification document with the changed portions added.
   - ✓ The certification period shall remain the same as the existing certification period in such cases.

(3) The system registrant certified during the change audit shall submit to SuMPO an application for change of registration and a copy of the certification document.

(4) SuMPO shall publish the change to the system on the Program website based on the application.

2-3. Maintenance Audit

(1) The system certification body shall conduct a maintenance audit on organizations granted certification during a period specified by the system certification body.

(2) The system certification body shall conduct a maintenance audit that is at least equivalent to the main audit.

(3) The system certification body shall submit the results of the maintenance audit to SuMPO during maintenance/renewal of the certification body in a maintenance audit report.

Appendix A: (Reference) User's Guide

The additional information presented in this appendix is for reference only and is intended to prevent misinterpretation of these requirements. Although this information corresponds and conforms to the numbers of these requirements, it is not intended to add to, delete from, or in any way change the requirements.

A. 1. General Requirements

The organization must document established systems in a way that anyone can understand them. Such documents should clearly state how the organization fulfills the requirements. The documents may use flow charts, diagrams, etc., in addition to text, and does not need to be compiled into a single document. The degree of documentation may differ according to the types of activities, complexity of processes, competence of personnel, etc., and as such should be determined appropriately by the organization or business.

When defining a scope of a system, the organization should consider its target product prescribed in the PCR and the enterprise itself.

When the organization operates other management systems, such as ISO 9001 and ISO 14001, it may establish and operate an integrated system by adding the processes required by these regulations to the management system by referring to Appendix B, etc.

A. 2. Responsibilities and Structure

Establishing implementation systems and clarifying roles, responsibilities, and authority is crucial for the success of the system. For implementation systems, the organization should consider a top management team, managers, quantifiers, data providers, internal verifiers, internal system auditors, etc.

The commitment made by the top management team is particularly important. To express this commitment, the organization should create a policy for the declaration and disclose it internally and externally. Top management should consist of senior executives within the scope of the system.

It is also a good idea for top management to appoint a specific manager with defined responsibilities and authority to implement the declaration as part of this commitment. For large-scale or complex organizations, more than one manager may be appointed.

The manager should manage the system as a whole and strive to deepen understanding of the Program inside and outside the organization, as well as communicate with top management about the declaration as needed (e.g., 12. Management Review).

A. 3. Declaration Planning

Creating an appropriate plan before conducting quantification for the declaration is required to promote the declaration effectively and efficiently.

The level of description for this plan may differ according to the scale of the organization, the number of products, etc. For example, whether a detailed plan for requesting data collection, gathering and compiling data or conducting internal verification is required can be written at a level the organization deems effective and efficient.

A. 4. Life Cycle Data Collection: Quantification

A.4.1 General

Life cycle data collection and quantification is the most important, central procedure in this system. That is why it is important to establish and document the procedures for life cycle data collection and quantification that are most appropriate for the organization.

Life cycle data collection and quantification procedures usually include procedures for data collection requests, data collection and provision, quantification, and creating declarations and marks.

Also, to perform life cycle data collection and quantification procedures efficiently, considering details prior to implementing procedures, such as clarifying the components of the target product, creating a life cycle flow diagram, applying for available data, etc., and clarifying implementation policy for ambiguities makes it possible to mitigate the occurrence of reworking and perform correct quantification efficiently.

Processes that make it easy to collect and use production control or design data as needed should be established to make data collection efficient and regular.

A.4.2 Request for Data Collection

Conveying relevant information whenever possible to the data provider is important for obtaining the necessary data. Consideration should be given toward helping the data provider perform their work efficiently and details such as the data collection period, range, sampling method, and criteria for instruments used in actual measurement should be provided.

A.4.3 Data Collection and Provision

The data provider, whether internal or external, should collect data without delay based on the data collection request; however, when ambiguity arises, the data provider should refrain from making a decision alone and instead confirm it with the data quantifier. Clarifying the provider's request and the quality of data they seek allows the provider to provide appropriate data, helping prevent the need to perform extra work, such as collecting data again.

During verification, it is also important to clarify where the responsibility for the provided data lies, since verification may be based on data collected and provided by the data provider.

It may not be possible to make a direct request to the data provider, especially when the data provider is outside the organization. In such cases, the data quantifier should take responsibility for maintaining close communication with the data provider to ensure the equivalent level of data collection as would be provided by an internal data provider.

A.4.4 Quantification

This is the stage that environmental impact results are calculated based on collected data according to the PCR and "Quantification and Declaration Rules", and then compiled into an application or other document. It is a good idea to first check the validity of collected data, such as whether the values were significantly different from estimated values. The validity of quantified values can be judged by checking the calculation results or comparing with the quantification results of a similar product.

Evidence must also be organized and stored in preparation for data verification. Since the data may contain confidential information, it is a good idea to have an appropriate management system

to prevent external leaks and other inappropriate handling of data.

A.4.5 Creating Declarations and Marks

Clarify specifications for marks and declarations based on the applicable PCR and the Rules for Registration and Publication of Declarations, and Usage of Marks. The declaration and mark will also be verified during the system certification audit. Keep in mind when creating these that they need to be readily understood by consumers and not lead to misunderstandings.

A. 5. Internal Verification

Internal verification is important in checking the appropriateness of quantification values and declarations. For this reason, the internal verifier should be knowledgeable on LCA, the Program, and the target products and production process, and should be in a position to conduct verification in a fair, objective manner.

Having the verifier be someone other than the data provider or quantifier of the product undergoing verification can prove the independence of the verifier.

While internal verification may be outsourced when there is a lack of resources in the organization, the responsibility for the verification results ultimately lies with the organization.

The “appropriate version” refers to be the latest version unless there is a specific reason to use a different version. However, when the work in “7. Change of Published Declaration” in these rules is performed on data quantified and published in the past, reverification based on the PCR from when the quantification was made may be necessary. In such cases, use the appropriate PCR rather than the latest version.

A. 6. Registration and Publication of Declarations and Usage of Marks

The applicant must first agree to the rules for preventing the improper use of the mark, then apply for the registration and publication of declaration before publishing the declaration on its website or on a product (for details, see Rules for Registration and Publication of Declarations, and Usage of Marks.)

It is a good idea to clarify procedures for applying for registration and publication of declarations, the criteria for publication (what conditions are required for application) and the division of roles (who performs the application work, who attaches the mark, who makes the final decision on the application, etc.).

A. 7. Changes to Published Declarations

There may be differences between published declarations and actual values, meaning it is a good idea to establish criteria and systems for changing declarations (procedures for finding discrepancies through monitoring, determining whether correction is necessary, and making corrections). Items to be changed must include all aspects of labeling, including the added information.

A. 8. Education and Training

Of everyone involved in a system, quantifiers, internal verifiers, and internal system auditors in particular require competence to perform their work. Competence criteria should be set based on experience and training in this Program and LCA as well as on qualifications as an internal auditor

for management systems such as ISO 14001 and other related work experience.

A. 9. Internal System Audit

Internal system audits are needed in order to regularly check the establishment and operational status of organizational systems to meet these requirements. That is why it is a good idea to check the results of internal verifications already implemented when auditing processes in internal verification for internal system audits.

Internal system auditors need to have not only knowledge of this Program but competence in management systems as well. Having ISO 9001 or 14001 internal auditor qualifications ensures competence in management systems.

Having the internal system auditor be someone other than top management or the manager and not allowing quantifiers to conduct internal audits on products that they themselves have quantified can demonstrate the independence of the internal system auditor.

While internal system audits may be outsourced when there is a lack of resources in the organization or when the organization upgrades its internal system audits, the responsibility for the system audits ultimately lies with the organization.

A. 10. Corrective Action

Nonconformities may occur within systems, quantified values, and declarations.

Eliminating the cause of the nonconformity and establishing systems to prevent its recurrence is effective in preventing the same mistake from happening again. However, this does not necessarily mean establishing a system that requires time and effort.

For example, effective and efficient methods such as adding recurrence prevention measures for nonconformities to a checklist or placing warnings in speech bubbles in the life cycle flow chart created in 4.1 b) to share information among the people involved could be considered.

A. 11. Document and Record Management

A.11.1 Management of Documents

The minimum documentation that must be created for these requirements is the manual (refer to “1. General Requirements”) and the life cycle data collection and quantification procedures (see “4. Life Cycle Data Collection and Quantification, 4.1 General”). Manual here refers to a document that describes the outline and procedures for the system established by an organization based on these requirements. Procedures refer to a document that prescribes details of certain work procedures (who, when, how, etc.). Procedures include data collection sheets, quantification sheets, emission factor lists generated in-house, quantification criteria, etc. Organizations may create other procedures when deemed necessary. When creating documents, it is a good idea to refer to the relevant external documentation listed as requirements in 11.1 Document Management. The “Rules of Operation” in d) refers to documents that define the rules of the Program as described on the Program website.

These documents need to be managed properly to prevent mistaken use of the wrong version.

The “appropriate version” refers to be the latest version unless there is a specific reason to use a different version; however, as long as there are products on the market with declarations made based on past documents, past documents must be maintained for accountability purposes.

A.11.2 Management of Records

It is a good idea to create records proving conformity to these requirements and records on quantification, such as the data used in quantification and their basis. These records should be organized and stored in a way that is readily accessible, as they are required for internal verification and internal system audits.

The storage period should be determined in consideration of the system certification renewal period.

A. 12. Management Review

The management review should include clarifications of information input to top management and the indications from top management regarding the system (output). The management review should also be used as a place of internal communication regarding top management's commitment. The management review can also be used for the organization to collect and share information for using the declaration strategically.

End of document.